



## **PUBLIC DISCLOSURE**

October 21, 2019

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Kentland FS&LA  
Charter Number 702228

116 N 3rd St  
Kentland, IN 47951-1212

Office of the Comptroller of the Currency  
8777 Purdue Road  
Suite 105  
Indianapolis, IN 46268

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**Institution’s CRA Rating:** Kentland FS&LA (Kentland or association) is rated Satisfactory.

**The Lending Test is rated:** Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on Kentland’s sole assessment area (AA), located in the state of Indiana.
- Kentland’s loan-to-deposit (LTD) ratio is more than reasonable.
- A majority of Kentland’s loans were originated inside its AA.

### Loan-to-Deposit Ratio

Kentland’s LTD ratio is more than reasonable given its small asset size, financial condition, and considering the credit needs of the AA.

Kentland’s quarterly LTD ratio averaged 109.2 percent. This was calculated since the last examination using 14 quarters of LTD ratios from June 30, 2015, to December 31, 2018. The LTD ratio fluctuated from a low of 96.4 percent, at March 31, 2016, to a high of 130.8 percent, at December 31, 2018. We compared Kentland’s LTD ratio to four other banks that are similarly situated, with assets ranging from \$59.5 million to \$417.5 million. These banks’ LTD ratios averaged between 60.0 percent and 84.6 percent.

### Lending in Assessment Area

A majority of Kentland’s loans are inside its AA.

The association originated 77.3 percent of its total loans inside its AA during the evaluation period.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	17	77.3	5	22.7	22	1,088	56.2	850	43.9	1,938
Total	17	77.3	5	22.7	22	1,088	56.2	850	43.9	1,938

## Description of Institution

Kentland is a federally chartered, mutual savings association operating a single office in Kentland, Indiana, with no affiliates or subsidiaries. Kentland's products are limited to savings accounts, certificates of deposit, single-family residential loans and business loans. Kentland does not have automated teller machines.

The AA consists of Newton County, where the association's office is located. Newton County is one of four counties that make up the Gary, Indiana Metropolitan Division (MD). The AA is made up of four census tracts (CTs).

According to the June 30, 2018 FDIC Market Share Report, Kentland had \$3.4 million in deposits, for a market share of 1.0 percent, ranking sixth out of the six institutions operating in the AA. Kentland is by far, the smallest institution among the six. Kentland Bank and Community State Bank ranked first and second, respectively, for deposit market share with 54.0 percent and 14.0 percent of deposits.

At December 31, 2018, Kentland had \$4.3 million in total assets and \$584,000 in tier 1 capital. The loan portfolio totaled \$4.1 million and represented 93.9 percent of total assets. The table below shows the loan portfolio composition:

<b>Loan Portfolio Composition</b>			
<b>Loan Category</b>	<b>Amount (\$000s)</b>	<b>Percent of Total Loans</b>	<b>Percent of Total Assets</b>
Home Mortgage	4,052	99.3	93.3
Business	27	0.7	0.6
Total	\$ 4,079	100.0%	93.9%

Source: Call Report for December 31, 2018

Factors that limit Kentland's ability to help meet the credit needs of the assessment area include its small asset size, limited loan products and significant local competition. Kentland received a "Satisfactory" rating at its previous CRA evaluation, dated May 21, 2015.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated Kentland using the Small Bank CRA procedures to assess its record of meeting the credit needs of its community. Small Bank CRA procedures include an evaluation of:

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

The evaluation period for this review is from October 1, 2014, through December 31, 2018. Based on the number and dollar volume of lending, Kentland's primary lending product is home mortgage loans. Home mortgage loans include home purchase, home refinance, and home improvement loans. Kentland is not subject to CRA loan reporting requirements. We evaluated all 22 home mortgage loans originations from April 1, 2015, through December 31, 2018.

We performed two separate analyses, one for 2015 through 2016 loan originations and one for 2017 through 2018 originations. This is due to the changes instituted by the 2015 American Community Survey (ACS), which updated population and housing information. The ACS also resulted in changes to the income designations of some CTs. Kentland did not change its lending strategy during the two analysis periods. For 2016, we used the 2010 U.S. Census for comparison purposes.

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

Kentland has one AA, consisting of Newton County in the state of Indiana, which was the focus of our review. As noted above, Newton County is one of four counties that makeup the Gary, Indiana MD. The AA is made up of four CTs. This AA received a full-scope review.

### **Ratings**

Kentland's overall rating is based on performance in its AA of Newton County. The 2017 through 2018 analysis period received more weight than the 2015 through 2016 analysis period, as this represented the majority of the evaluation period.

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

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 Indiana

**CRA rating for the state of Indiana:** Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- A reasonable geographic distribution of loans.
- A reasonable distribution of loans to individuals of different income levels.

### Description of Institution's Operations in Indiana

Kentland operates a single office in the northwestern part of Central Indiana. Please refer to the *Description of Institution* section for additional details. The association has one AA, Newton County in the Gary, Indiana MD, which had a population of 14,244 according to the 2010 U.S. Census. Based on the 2015 ACS, the population remained stable, totaling 14,857. The AA includes four CTs. The 2015 ACS resulted in an income designation change to one CT in the AA. For loans originated in 2015-2016, income designation comparisons are based on the 2010 U.S. Census, which identified all CTs as middle-income. For loans originated in 2017-2018, income designation comparisons are based on the 2015 ACS. After this change, the AA consisted of one moderate-income and three middle-income CTs.

During the evaluation period, families living below the poverty level increased from 4.9 percent to 9.7 percent. The median housing value increased from \$110,331 to \$111,745, and the median gross rent increased from \$637 to \$692, making housing less affordable. Owner-occupied housing units decreased from 73.9 percent to 67.3 percent, while occupied rental units increased from 16.3 percent to 22.2 percent. Vacant units remained fairly stable overall. The average annual unemployment rate in Newton County was above the state of Indiana at December 31, 2018, according to the Bureau of Labor Statistics. The average annual unemployment rate for Newton County was 4.3 percent, compared to the state of Indiana's average annual unemployment rate of 3.4 percent.

Competition for home mortgage loans in the association's AA is strong. Based on 2018 Peer Mortgage Data, the top lenders were Community State Bank, with 10.6 percent, and Wells Fargo Bank, with 5.9 percent. Both institutions are significantly larger than Kentland. Kentland was not a HMDA reporter, therefore not listed on the Peer Mortgage Data report.

One new community contact was performed for this evaluation and one community contact performed in 2018 pertinent to the association's AA was reviewed. The contacts noted local banks have been very involved in supporting lending for small farms and homeowners and did not note unmet credit needs.

**Gary, Indiana MD 2015-2016**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Kentland</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	4	0.0	0.0	100.0	0.0	0.0
Population by Geography	14,244	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	6,041	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	4,462	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	984	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	595	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	781	0.0	0.0	100.0	0.0	0.0
Farms by Geography	117	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,943	16.1	22.6	27.9	33.4	0.0
Household Distribution by Income Level	5,446	20.1	19.7	20.8	39.4	0.0
Median Family Income MSA - 23844 Gary, IN MD		\$62,512	Median Housing Value			\$109,049
			Median Gross Rent			\$637
			Families Below Poverty Level			4.8%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Gary, Indiana MD 2017-2018

Table A – Demographic Information of the Assessment Area						
Assessment Area: Kentland						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	25.0	75.0	0.0	0.0
Population by Geography	14,057	0.0	21.6	78.4	0.0	0.0
Housing Units by Geography	6,040	0.0	23.6	76.4	0.0	0.0
Owner-Occupied Units by Geography	4,062	0.0	22.0	78.0	0.0	0.0
Occupied Rental Units by Geography	1,339	0.0	24.1	75.9	0.0	0.0
Vacant Units by Geography	639	0.0	32.2	67.8	0.0	0.0
Businesses by Geography	769	0.0	25.6	74.4	0.0	0.0
Farms by Geography	120	0.0	29.2	70.8	0.0	0.0
Family Distribution by Income Level	3,739	22.4	24.6	24.3	28.7	0.0
Household Distribution by Income Level	5,401	24.3	20.4	20.4	34.9	0.0
Median Family Income MSA - 23844 Gary, IN MD		\$64,075	Median Housing Value			\$108,280
			Median Gross Rent			\$692
			Families Below Poverty Level			9.7%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Indiana

The association has only one AA, Newton County in the Gary, Indiana MD. We performed a full-scope review of the AA.

Refer to the table in Appendix A: Scope of Examination for additional information.

## LENDING TEST

Kentland's performance under the Lending Test in Indiana is rated Satisfactory.

Based on a full-scope review, the association's lending performance in the state of Indiana is reasonable. The geographic distribution of home mortgage loans is reasonable. The borrower distribution of home mortgage loans is reasonable. We did not identify any conspicuous lending gaps.

## Distribution of Loans by Income Level of the Geography

The association exhibits reasonable geographic distribution of loans in the AA based on the strong level of competition within the area for these loans and the increased poverty level as noted in the *Description of Institution's Operations in Indiana* section.



### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans is considered reasonable.

The association's percentage of loans in the moderate-income CT was below the percentage of owner-occupied housing units and aggregate lending in 2017-2018. AA loans in 2017-2018 were made in the two CTs nearest to the association's office. Kentland's small size, limited resources and lack of branches makes it more difficult to reach borrowers in the moderate CT, which is located farther away from its office. In 2015-2016, all CTs were designated as middle-income, so no further analysis was performed.

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

### ***Lending Gap Analysis***

We reviewed summary reports and maps and analyzed Kentland's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

The association exhibits a reasonable distribution of loans to individuals of different income levels, given the limited products offered by the association.

### ***Home Mortgage Loans***

Overall, the borrower distribution of home mortgage loans is reasonable.

The borrower distribution of home mortgage loans in 2017-2018 was reasonable. The distribution of the association's lending to low-income borrowers was below the percentage of low-income families but above the aggregate lending. The distribution of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and aggregate lending. The borrower distribution of home mortgage loans in 2016 was inconsistent with the performance in 2017-2018. The percentage of loans to low-income borrowers was below the percentage of low-income families and slightly below aggregate lending. The distribution of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was near the aggregate lending percentage.

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

### **Responses to Complaints**

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

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	04/01/2015 to 12/31/2018	
<b>Bank Products Reviewed:</b>	Home mortgage	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
State of Indiana		
Gary, IN MD	Full-scope	Newton County

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS</b>	<b>Kentland FS&amp;LA</b>
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
Kentland FS&LA	Satisfactory
<b>State:</b>	
Indiana	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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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 (MD):** 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 (MSA):** 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

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### 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 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.



<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2017-18</b>		
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		
Kentland	7	218	100.0	423	0.0	0.0	0.0	22.0	0.0	22.2	78.0	100.0	77.8	0.0	0.0	0.0	0.0	0.0	0.0		
<b>Total</b>	<b>7</b>	<b>218</b>	<b>100.0</b>	<b>423</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>22.0</b>	<b>0.0</b>	<b>22.2</b>	<b>78.0</b>	<b>100.0</b>	<b>77.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2015-16</b>	
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	
Kentland	10	870	100	479	16.1	10.3	11.7	22.6	24.7	25.5	27.9	27.0	22.3	33.4	37.9	19.6	0.0	0.0	20.9	
<b>Total</b>	<b>10</b>	<b>870</b>	<b>100</b>	<b>479</b>	<b>16.1</b>	<b>10.3</b>	<b>11.7</b>	<b>22.6</b>	<b>24.7</b>	<b>25.5</b>	<b>27.9</b>	<b>27.0</b>	<b>22.3</b>	<b>33.4</b>	<b>37.9</b>	<b>19.6</b>	<b>0.0</b>	<b>0.0</b>	<b>20.9</b>	

*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*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017-18</b>	
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	
Kentland	7	218	100	423	22.4	19.4	16.3	24.6	45.3	22.7	24.3	35.2	25.3	28.7	0.0	18.2	0.0	0.0	17.5	
<b>Total</b>	<b>7</b>	<b>218</b>	<b>100</b>	<b>423</b>	<b>22.4</b>	<b>19.4</b>	<b>16.3</b>	<b>24.6</b>	<b>45.3</b>	<b>22.7</b>	<b>24.3</b>	<b>35.2</b>	<b>25.3</b>	<b>28.7</b>	<b>0.0</b>	<b>18.2</b>	<b>0.0</b>	<b>0.0</b>	<b>17.5</b>	

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