



## **PUBLIC DISCLOSURE**

October 28, 2019

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

Home Loan Investment Bank, F.S.B.  
Charter Number 712504

1 Home Loan Plaza  
Suite 3  
Warwick, RI 02886

Office of the Comptroller of the Currency

99 Summer Street  
Suite 1400  
Boston, MA 02110

**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 ..... 4**  
**DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW ..... 6**  
**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS ..... 7**  
    *Lending Test.....7*  
    *Lending to Borrowers of Different Incomes.....8*  
    *Geographic Distribution of Loans .....10*  
**APPENDIX A: SCOPE OF EXAMINATION..... A-1**  
**APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS..... B-1**  
**APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS..... C-1**  
**APPENDIX D: TABLES OF PERFORMANCE DATA ..... D-1**

## Overall CRA Rating

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

**The lending test is rated: Satisfactory.**

The major factors that support this rating include:

- Home Loan Investment Bank, FSB's level of lending, as reflected by the loan-to-deposit (LTD) ratio, is considered more than reasonable
- A majority of the Bank's primary lending product, residential home mortgages by total dollar amount, were originated and/or purchased within the delineated assessment area (AA) while a majority of consumer automobile loans were originated outside of the bank's delineated AA.
- Overall, the distribution of home mortgage and consumer automobile loans within the delineated AA reflects reasonable distribution to borrowers of different income levels, given performance context.
- Overall, the distribution of home mortgage and consumer automobile loans within the delineated AA reflects reasonable distribution across geographies of different income levels, given performance context.
- There were no CRA-related complaints received by the Bank or the OCC during the evaluation period of January 1, 2016 through December 31, 2018.

## Description of Institution

Home Loan Investment Bank, FSB (HLIB, or “the Bank”) is a federally chartered stock savings association, headquartered in Warwick, Rhode Island (RI). The Bank is wholly owned by Prospect Financial Corporation, a holding company with minimal other assets or operations. As of December 31, 2018, the Bank had total assets of approximately \$302 million and Tier 1 Capital of \$28 million. The Bank operates in a single AA, the Providence-Warwick RI-MA multi-state metropolitan statistical area (MMSA), and all branches and automated teller machines (ATMs) are located within Rhode Island. The Bank offers a standard array of traditional loan and deposit products for consumer and business customers with a focus on residential and consumer loans. The automobile lending portfolio has expanded in recent years, but residential lending remains the primary loan product as demonstrated by the Bank’s asset mix and loan originations. The Bank offers other services including online banking, mobile banking, direct deposit, and wire transfer services. The Bank’s website, [www.homeloanbank.com](http://www.homeloanbank.com), provides descriptions of available lending and deposit product offerings.

The Bank has three branches, one of which is its headquarters in Warwick, RI. One retail branch is also located in Warwick, RI and the other in Providence, RI. The Providence branch is located in a moderate-income tract, the Warwick branch is located in a middle-income tract, and the headquarters is located in an upper-income tract. Branch hours are 9:00 AM to 5:00 PM, Monday through Friday, while the headquarters is open 8:30 AM to 5:30 PM on weekdays. The Warwick and Providence branches are also open 9:00 AM to 1:00 PM on Saturdays. No branches were opened or closed during the evaluation period. HLIB is part of the Allpoint ATM network, which provides free ATM withdrawals from over 55,000 Allpoint network ATMs for checking account customers.

The Bank is primarily a residential mortgage and consumer automobile lender. The Bank offers traditional home purchase mortgage loans, home equity loans, and home improvement loans. The Bank also originates a substantial number of FHA Title 1 Property Improvement loans nationwide. These loans are guaranteed by the Department of Housing and Urban Development (HUD). Additionally, the Bank originates consumer automobile loans nationwide.

HLIB’s single AA, the Providence-Warwick RI- MMSA contains 370 census tracts, of which 53 are low-income, 69 are moderate-income, 129 are middle-income, 112 are upper-income, and seven have no income information.

As of December 31, 2018, the loan portfolio totaled approximately \$270 million, or 89 percent of total assets. The distribution of the Bank’s loan portfolio is provided in the table below:

<b>Table 1 - Loan Portfolio Summary by Loan Product December 31, 2018</b>	
<b>Loan Category</b>	<b>% of Gross Loans and Leases</b>
1-4 Family Residential Mortgage – Closed End	58%
Consumer	30%
Commercial Real Estate	12%
Commercial & Industrial	<1%
<b>Total</b>	<b>100</b>

Source: Federal Deposit Insurance Corporation Call Report, December 31, 2018.

The Bank has no financial or legal impediments in meeting the credit needs of the AA. The Bank was rated "Satisfactory" using Small Bank (SB) procedures during the previous CRA evaluation dated July 25, 2016.

## Scope of the Evaluation

HLIB was evaluated using SB examination procedures, which consists of the Lending Test. The Lending Test evaluates the Bank's record of meeting the credit needs of its AA through its lending activities.

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test covers the Bank's performance from January 1, 2016 through December 31, 2018, which is representative of the Bank's activities since the prior CRA evaluation. Due to updates made to demographic information during the evaluation period, we evaluated the Bank's 2016 performance independent of 2017 and 2018 performance metrics. For year 2016, performance was compared to the 2010 U.S. Census data as well as 2016 Dun & Bradstreet (D&B) data. For years 2017 and 2018, performance was compared to 2015 American Community Survey (ACS) census data and 2018 D&B data.

The Bank's primary lending products, based on originations during the evaluation period, were residential home mortgage and improvement loans and consumer automobile loans. Residential home mortgage loans, including home purchase, home improvement, and home refinance loans account for approximately 31 percent by number and 68 percent by dollar amount of all loans originated and/or purchased during the evaluation period. Auto loans accounted for 68 percent of all loans originated or purchased by number and 21 percent by dollar amount.

When evaluating HLIB's lending performance, we gave equal weight to both home mortgage lending and consumer automobile lending. During the evaluation period, HLIB originated more than 14,000 consumer automobile loans with an average balance of \$11,210 compared to almost 7,000 home mortgage and home improvement loans with an average balance of \$79,000.

More emphasis was given to residential home mortgage loans originated in 2017 and 2018 compared to home mortgage loans originated in 2016 as there were more loans originated in 2017 and 2018 than 2016. For consumer automobile loans, equal weight was placed on loans originated in 2016 and those originated in 2017 and 2018.

### Selection of Areas for Full-Scope Review

The CRA requires an institution to define its AA in which it will be evaluated. HLIB has delineated their AA to meet the requirements of the regulation. The Bank's AA is comprised of part of the Providence-Warwick RI-MA MMSA. The AA consists of wholly-contiguous political subdivisions and does not arbitrarily exclude any low- or moderate-income (LMI) geographies. Specifically, the Bank's AA includes the RI counties of Bristol, Kent, Newport, Providence, and Washington, and the Massachusetts county of Bristol.

## **Ratings**

The Bank's overall rating is based on HLIB's single delineated AA which received a full-scope review. As previously discussed, the Bank's performance during the 2017-2018 evaluation period was more heavily weighted for home mortgage loans, while equal weight was given to all three years for auto loans. Seventy-seven percent of consumer automobile loans and 66 percent of residential mortgage loans originated during the full evaluation period of January 1, 2016 to December 31, 2018 were originated during calendar years 2017 and 2018.

Please refer to the "Selection of Areas for Full-Scope Review" and the "Scope of the Evaluation" sections above for further discussion regarding primary product determination, AA designations, and overall rate weighting.

## **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 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**

### **Lending Test**

HLIB's performance under the LT is rated "Satisfactory." HLIB's net LTD ratio is considered more than reasonable given the institution's size, financial condition, and AA competition and credit needs. A majority of home mortgage loans, by dollar amount, were originated inside of the delineated AA, while a substantial majority of consumer automobile loans were originated outside of the AA. Overall, the distribution of home loans within the delineated AA reflects reasonable distribution to borrowers of different income levels and reasonable distribution across geographies of different income levels, given performance context. Lastly, there were no CRA-related complaints received by the Bank or the OCC during the evaluation period.

### **Loan-to-Deposit Ratio**

The Bank's LTD ratio is considered more than reasonable given the size, financial condition, and AA competition and credit needs. HLIB's quarterly net LTD ratio averaged approximately 102 percent over the last 11 quarters since the previous evaluation dated July 25, 2016. During the 11 preceding quarters, June 30, 2016 to December 31, 2018, the LTD ranged from a quarterly low of 97 percent to a quarterly high of 110 percent. We compared the Bank's LTD ratio to the nine local competitors, with total asset sizes ranging from \$65 million to \$1.9 billion. The quarterly average LTD ratio for the peer group during the same period was 90 percent, with a quarterly average low of 88 percent and a high of 94 percent. Among single institutions within the peer group, the highest average LTD ratio was 105 percent and the lowest average was 68 percent.

### **Lending in Assessment Area**

A substantial majority of the Bank's home mortgage loans were originated outside of its AA when evaluating by the number of loans. By total dollar amount, a majority of the Bank's home mortgage loans were originated inside its AA. HLIB originated approximately 25 percent by number and 57 percent by dollar amount of loans within the AA from January 1, 2016 to December 31, 2018. This results from the Bank's unique business model as a national FHA Title 1 Property Improvement loan lender. FHA Title 1 loans are federally guaranteed by HUD. Title 1 loans have a maximum balance at origination of \$25,000 and frequently less than \$7,500. Title 1 loans have no loan-to-value maximum and are used to renovate, refurbish, or repair housing that may otherwise be ineligible for traditional home improvement loans. Although by count the majority of HLIB's loans were originated outside of the AA, as HLIB is supporting HUD's mission of providing safe and sanitary housing in the United States by providing Title 1 loans nationwide, the Bank's record of lending in its AA is considered satisfactory.

The following table details the Bank's level of home mortgage lending within the AA by number and dollar amount of originated/purchased loans:

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	525	28.2	1,340	71.9	1,865	100,726	55.4	81,066	44.6	181,792
2017	606	23.0	2,026	77.0	2,632	114,586	59.0	79,497	41.0	194,083
2018	423	25.8	1,215	74.2	1,638	87,328	57.7	64,120	42.3	151,448
<b>Subtotal</b>	<b>1,554</b>	<b>25.3</b>	<b>4,581</b>	<b>74.7</b>	<b>6,135</b>	<b>302,640</b>	<b>57.4</b>	<b>224,683</b>	<b>42.6</b>	<b>527,323</b>
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2018 HMDA Bank Data Due to rounding, totals may not equal 100.0</i>										

Based on a random sample of 20 loans, a substantial majority of consumer automobile loans, by both count and dollar amount were originated outside of its delineated AA. HLIB is a national automobile lender and this is consistent with its business practice of making automobile loans nationwide.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Consumer										
2016 - 2018	7	35.0	13	65.0	20	48	26.0	138	74.0	186
<b>Subtotal</b>	<b>7</b>	<b>35.0</b>	<b>13</b>	<b>65.0</b>	<b>20</b>	<b>48</b>	<b>25.8</b>	<b>138</b>	<b>74.2</b>	<b>186</b>
<b>Total</b>	<b>7</b>	<b>35.0</b>	<b>13</b>	<b>65.0</b>	<b>20</b>	<b>48</b>	<b>25.8</b>	<b>138</b>	<b>74.2</b>	<b>186</b>
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data, sample of 20 loans. Due to rounding, totals may not equal 100.0</i>										

## Lending to Borrowers of Different Incomes

Overall, HLIB's distribution of home mortgage and consumer automobile loans within their delineated AA for the full evaluation period of January 1, 2016 to December 31, 2018 reflects a reasonable distribution to borrowers of different income levels, given performance context. The level of home mortgage lending was compared to aggregate peer data, our primary comparator for home mortgage loans. The level of consumer automobile lending was compared to demographic data, our primary comparator for consumer loans.

### Home Loans 2016

The overall distribution of home mortgage lending during the 2016 evaluation period reflects reasonable distribution to borrowers of different income levels given AA demographic characteristics

and significant market competition. The percentage of home loans made to low-income borrowers is near to peer aggregate lending data. The percentage of home loans made to moderate-income borrowers exceeds aggregate peer data.

#### *Home Loans 2017-2018*

The overall distribution of home mortgage lending during the 2017-2018 evaluation period reflects reasonable distribution to borrowers of different income levels given AA demographic characteristics and significant market competition. The percentage of home loans made to low-income borrowers is well below aggregate lending data. The percentage of home loans made to moderate-income borrowers exceeds aggregate peer data.

The Bank's performance for the 2017-2018 evaluation period is considered satisfactory given the significant local market competition for home loans and the lack of affordable housing for low- and moderate-income groups within the AA. According to the 2018 Peer Mortgage Market Share data, amongst all home mortgage lending to low-income borrowers, HLIB ranked 49<sup>th</sup> out of 184 lenders in the market with less than one percent market share representing 14 total loans originated. Furthermore, for home mortgage loans, the top ten lenders in the AA account for more than 46 percent of all mortgages originated to low-income borrowers. Top lenders to low-income borrowers include Citizens Bank, N.A., Navigant Credit Union, Santander Bank, N.A., Quicken Loans, and Pawtucket Credit Union. Market share for these lenders ranged from 13.99 percent to 4.11 percent. Performance among all borrowers is similar, with the top ten lenders originating more than 37 percent of total loans in 2018. Similarly, HLIB originated less than one percent of total home mortgage loans during 2018 and ranked 37<sup>th</sup> out of 481 total lenders.

Further, a lack of affordable housing limits lending opportunities for LMI borrowers. According to the 2015 ACS, during the 2017-2018 evaluation period, the median housing value within the AA was \$258,088. Low-income borrowers and households have incomes equal to or less than \$38,428, or half of the median family income for the AA, which makes homeownership unaffordable for many low-income borrowers. Of the 93,426 low-income households within the AA, 87,580 are living below the poverty level, further limiting lending opportunities to low-income borrowers. Affordability is a concern throughout the AA, even for middle- and upper-income census tracts, as 42 percent of homeowners in middle-income census tracts and 38 percent of homeowners in upper-income census tracts have housing costs exceeding 30 percent of household income.

#### *Auto Loans 2016*

The overall distribution of consumer automobile lending during the 2016 evaluation period reflects excellent distribution to borrowers of different income levels given AA demographic characteristics. The percentage of consumer automobile loans made to low- and moderate-income borrowers exceeds the percentage of low- and moderate-income households residing within the AA.

#### *Auto Loans 2017-2018*

The overall distribution of consumer automobile lending during the 2016 evaluation period reflects reasonable distribution to borrowers of different income levels given AA demographic characteristics. The percentage of consumer automobile loans made to moderate-income borrowers exceeds the percentage of moderate-income households residing within the AA.

To assess consumer automobile lending performance to low- and moderate-income borrowers, we selected a random sample of automobile loans. The random sample for 2017-2018 did not include any loans to low-income borrowers upon which to conclude. Given the limited sample size, to assess the Bank's performance lending to low-income borrowers, we are relying on performance in 2016.

## **Geographic Distribution of Loans**

Overall, HLIB's distribution of home mortgage and consumer automobile loans within their delineated AA for the full evaluation period of January 1, 2016 to December 31, 2018, reflects a reasonable distribution across geographies of different income levels, given performance context. The level of home mortgage lending was compared to aggregate peer data while the level of consumer automobile lending was compared to the percentage of households in low- and moderate-income tracts.

### *Home Loans 2016*

The overall distribution of home mortgage lending during the 2016 evaluation period reflects reasonable distribution amongst the low- and moderate-income census tracts, given performance context. The Bank's percentage of home mortgage loans originated within both low- and moderate-income census tracts is below peer aggregate lending data.

Lending within low- and moderate-income census tracts is considered reasonable due to the limited level of owner-occupied housing units within the census tracts and significant competition in the census tracts for LMI borrowers. Opportunities to lend in low- and moderate-income census tracts within the AA are limited. Per the 2010 census, rental properties comprise the majority of housing units within the AA in both low- and moderate-income census tracts. Within low-income census tracts, there are 65,276 households and 55,002 rental units, leaving only 10,274 housing units, or 16 percent, available for owner-occupancy. Prospects for owner-occupancy within moderate-income census tracts is less dire, but still challenging, with 116,959 households and 72,495 rental units. Owner-occupied units total 44,464, or 38 percent of total housing within the moderate-income census tracts. This level of owner-occupied homes in low- and moderate-income census tracts does not compare favorably to middle- and upper-income census tracts, where owner-occupied properties represent 67 percent and 88 percent, respectively, of available properties.

Additionally, competition from banks, non-bank lenders, and credit unions for mortgage loans within low- and moderate-income census tracts is high. In 2016, there were 277 active lenders within the low- and moderate-income census tracts in the AA. HLIB ranked 41<sup>st</sup> among these lenders, with less than one percent of loans by both count and dollar amount. The top ten lenders within these census tracts accounted for 34 percent of total loans originated by loan count and 30 percent of loans by dollar amount. Each of the top lenders originated more than two percent of the total number of loans originated within the AA during 2016. Top lenders within the AA included Wells Fargo Bank, N.A., First Home Mortgage, Residential Mortgage Services, Pennymac Loan Services, LLC, and Coastway Community Bank.

### *Home Loans 2017-2018*

The overall distribution of home mortgage lending during the 2017-2018 evaluation period reflects reasonable distribution across low- and moderate-income census tracts, given performance context. The Bank's percentage of home mortgage loans originated within both low- and moderate-income census tracts is below peer aggregate lending data.

Opportunities to lend in low- and moderate-income census tracts within the AA are limited. Per the 2015 ACS, rental properties comprise the majority of housing units within the AA in both low- and moderate-income census tracts. Within low-income census tracts, there are 72,102 households and 61,025 rental units, leaving only 11,077 housing units, or 15 percent, available for owner-occupancy. Opportunities for owner-occupancy in moderate-income tracts worsened in 2018, compared to 2016, with 108,977 households and 71,234 rental units. Owner-occupied units total 37,743 or 35 percent of total housing within the moderate-income census tracts. This level of owner-occupied homes in low- and moderate-income census tracts continues to compare unfavorably to middle- and upper-income census tracts, where owner-occupied properties represent 65 percent and 77 percent, respectively, of available properties.

Competition from banks, non-bank lenders, and credit unions for mortgage loans within low- and moderate-income census tracts remained high in 2018. There were 297 active lenders within the low- and moderate-income census tracts in the AA. HLIB ranked 39th among these lenders, with less than one percent of loans by both count and dollar amount. The top ten lenders within these census tracts accounted for 34 percent of total number of loans originated and 26 percent by dollar amount. Top lenders within the AA during 2018 included Citizen's Bank, N.A., Residential Mortgage Services, Navigant Credit Union, Wells Fargo Bank, N.A., and Pennymac Loan Services, LLC. Each of the top five lenders originated more than three percent of the total number of loans originated within the LMI census tracts in the AA during 2018.

### *Auto Loans 2016*

The overall distribution of consumer automobile lending during the 2016 evaluation period reflects excellent distribution across low- and moderate-income census tracts. The Bank's percentage of consumer automobile loans originated within both low- and moderate-income census tracts exceeds the percentage of households living within those geographies.

### *Auto Loans 2017-2018*

The overall distribution of consumer automobile lending during the 2017-2018 evaluation period reflects reasonable distribution across low- and moderate-income census tracts. The Bank's percentage of consumer automobile loans originated in moderate-income census tracts exceeds, the percentage of households living within those geographies.

To assess consumer automobile lending performance to low- and moderate-income borrowers, we selected a random sample of 20 automobile loans. The random sample for 2017-2018 did not include any loans to borrowers within low-income census tracts upon which to conclude. For automobile loans to low-income borrowers, we are relying on performance in 2016.

## **Responses to Complaints**

There were no CRA-related complaints received by the Bank or the OCC 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 MMSAs that received a comprehensive review, designated by the term “full-scope.”

<b>Time Period Reviewed:</b>	01/01/2016 – 12/31/2018	
<b>Bank Products Reviewed:</b>	Home Mortgage Loans, Consumer Automobile Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None reviewed		
<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>
<b>MMSA(s)</b>		
Providence-Warwick, RI-MA MMSA	Full-Scope	<ul style="list-style-type: none"> <li>• Providence-Warwick, RI-MA MMSA (#9100) <ul style="list-style-type: none"> <li>○ Rhode Island Counties <ul style="list-style-type: none"> <li>▪ <i>Bristol, Kent, Newport, Providence, Washington</i></li> </ul> </li> <li>○ Massachusetts Counties <ul style="list-style-type: none"> <li>▪ <i>Bristol</i></li> </ul> </li> </ul> </li> </ul>

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

The CRA requires a bank to define the AA in which it will be evaluated. HLIB has one AA that includes all branches as well as the contiguous towns, cities, and counties around these offices. The Bank’s AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income census tracts.

### Full-Scope Assessment Area

HLIB’s full-scope AA consists of part of the Providence-Warwick RI-MA MMSA. Specifically, the Bank’s AA includes the Rhode Island counties of Bristol, Kent, Newport, Providence, and Washington, and the Massachusetts county of Bristol.

In 2016, the AA consisted of 368 geographies, of which 47 were low-income, 77 moderate-income, 137 middle-income, 104 upper-income, and three had no income information. The weighted average median family income for the AA was \$73,225. The median housing value for the AA per 2010 US Census data was \$301,214.

The following table illustrates the demographic information of the full-scope AA during 2016:

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	368	12.8	20.9	37.2	28.3	0.8
Population by Geography	1,600,852	10.4	19.2	38.8	31.6	0.0
Housing Units by Geography	690,006	11.2	19.1	39.8	30.0	0.0
Owner-Occupied Units by Geography	391,560	4.0	12.9	44.7	38.3	0.0
Occupied Rental Units by Geography	229,534	21.6	28.9	33.7	15.8	0.0
Vacant Units by Geography	68,912	17.2	21.6	31.8	29.4	0.0
Businesses by Geography	95,251	9.0	16.5	39.7	34.7	0.1
Farms by Geography	2,587	3.5	8.2	38.1	50.2	0.0
Family Distribution by Income Level	400,698	22.6	16.9	20.1	40.5	0.0
Household Distribution by Income Level	621,094	26.1	14.8	16.7	42.4	0.0
Median Family Income MMSA - 39300 Providence-Warwick, RI-MA MMSA		\$70,496	Median Housing Value			\$301,214
			Median Gross Rent			\$854
			Families Below Poverty Level			8.512.5%

*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.*



In 2018, the AA consisted of 370 geographies, of which 53 were low-income, 69 moderate-income, 129 middle-income, 112 upper-income, and seven had no income information. The weighted average median family income for the AA was \$76,857. The median housing value for the AA per the 2015 ACS Census was \$258,088.

The following table illustrates the demographic information of the full-scope AA during 2018:

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	370	14.3	18.6	34.9	30.3	1.9
Population by Geography	1,606,424	11.8	16.8	35.9	34.8	0.6
Housing Units by Geography	693,886	12.1	17.5	36.4	33.5	0.4
Owner-Occupied Units by Geography	378,517	4.3	11.2	41.5	42.8	0.2
Occupied Rental Units by Geography	244,114	22.9	27.3	31.0	18.1	0.7
Vacant Units by Geography	71,255	16.9	17.8	28.1	36.8	0.4
Businesses by Geography	100,669	9.8	15.3	35.6	38.6	0.7
Farms by Geography	2,836	3.7	8.4	32.6	55.3	0.1
Family Distribution by Income Level	396,417	23.6	16.4	19.2	40.8	0.0
Household Distribution by Income Level	622,631	26.4	14.7	16.0	42.9	0.0
Median Family Income MMSA - 39300 Providence-Warwick, RI-MA MMSA		\$76,857	Median Housing Value			\$258,088
			Median Gross Rent			\$897
			Families Below Poverty Level			9.9%

*Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.*

HLIB operates in a competitive market with competition from large banks, regional commercial banks, regional credit unions, and other savings banks. The Federal Deposit Insurance Corporation's (FDIC) Deposit Share Report for June 30, 2018, indicates that 30 financial institutions operate within the Providence-Warwick RI-MA MMSA AA. HLIB ranked 20<sup>th</sup> of the 30 deposit taking institutions in the AA, controlling 0.51 percent of the market share. The top five local competitors include Bank of America, N.A., Citizens Bank, N.A., Santander Bank, N.A., the Washington Trust Company of Westerly, and the Bank of Rhode Island. Together, these five institutions control over 75 percent of total deposits within the AA.

The Bank also has heavy competition for residential loans in the AA, which is the Bank's primary product. The 2018 Peer Mortgage Data shows that there are 481 lenders within the AA. HLIB ranks 37<sup>th</sup>, with less than one percent of the market share. Competitors include large national institutions, local and regional banks, and other institutions such as brokerage firms,

credit unions and finance companies. The top lenders in the AA are Citizens Bank, Navigant Credit Union, Pawtucket Credit Union, Wells Fargo, and Residential Mortgage Services. Other large lenders in the area include Santander, Quicken Loans, Bank of America and JP Morgan Chase.

According to Moody's Analytics economic factors as of September 2019, Providence and the entire state of Rhode Island are in the late expansion phase of the business cycle. Unemployment continues to decline, with the unemployment rate for Providence and the state at 4.1 percent in 2018, compared to 9.1 percent in 2013 and 5.1 percent in 2016. Per the Bureau of Labor Statistics, unemployment in Rhode Island had declined to a seasonally adjusted level of 3.5 percent in December 2019. Employment gains have occurred largely in defense, healthcare, and construction. Rhode Island has led all states in the Northeast in job growth over the past six months and 12-month job growth matches the US average. Costs and slow population growth remain a concern. Top employers in the region include Lifespan, Care New England, CVS Health Corp, Citizens Financial Group, and General Dynamics.

In assessing the Bank's performance, we reached out to several community contacts to better determine the credit needs of the AA. We made contact with one local organization who provides housing for low- and moderate-income individuals. This organization had a significant list of applicants waiting for affordable housing, which is consistent with our findings regarding the lack of affordable housing available within the AA. This organization routinely has a zero percent vacancy rate with several hundred qualified applicants on its waiting list. The executive director stated that financial institutions within the AA were able to meet credit needs and the largest impediment was borrower income compared to housing costs.

## 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 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.
- 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.



<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2016</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
MMSA AA	525	100,726	100.0	4.0	2.7	4.0	12.9	9.1	12.0	44.7	43.8	43.7	38.3	44.4	40.3	0.0	0.0	0.0	
<b>Total</b>	<b>525</b>	<b>100,726</b>	<b>100.0</b>	<b>4.0</b>	<b>2.7</b>	<b>4.0</b>	<b>12.9</b>	<b>9.1</b>	<b>12.0</b>	<b>44.7</b>	<b>43.8</b>	<b>43.7</b>	<b>38.3</b>	<b>44.4</b>	<b>40.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2017-2018</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
MMSA AA	1,029	201,914	100.0	4.3	4.1	5.3	11.2	9.3	11.9	41.5	46.6	40.2	42.8	39.8	42.4	0.2	0.1	0.2	
<b>Total</b>	<b>1,029</b>	<b>201,914</b>	<b>100.0</b>	<b>4.3</b>	<b>4.1</b>	<b>5.3</b>	<b>11.2</b>	<b>9.3</b>	<b>11.9</b>	<b>41.5</b>	<b>46.6</b>	<b>40.2</b>	<b>42.8</b>	<b>39.8</b>	<b>42.4</b>	<b>0.2</b>	<b>0.1</b>	<b>0.2</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>2016</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
MMSA AA	525	100,726	100.0	22.6	3.6	4.2	16.9	21.3	15.8	20.1	28.4	22.5	40.5	45.7	39.9	0.0	1.0	17.5	
<b>Total</b>	<b>525</b>	<b>100,726</b>	<b>100.0</b>	<b>22.6</b>	<b>3.6</b>	<b>4.2</b>	<b>16.9</b>	<b>21.3</b>	<b>15.8</b>	<b>20.1</b>	<b>28.4</b>	<b>22.5</b>	<b>40.5</b>	<b>45.7</b>	<b>39.9</b>	<b>0.0</b>	<b>1.0</b>	<b>17.5</b>	

*Source: 20X10 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2017-2018</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
MMSA AA	1,029	201,914	100.0	23.6	2.7	6.1	16.4	21.9	19.9	19.2	31.8	24.4	40.8	43.4	36.4	0.0	0.2	13.2	
<b>Total</b>	<b>1,029</b>	<b>201,914</b>	<b>100.0</b>	<b>23.6</b>	<b>2.7</b>	<b>6.1</b>	<b>16.4</b>	<b>21.9</b>	<b>19.9</b>	<b>19.2</b>	<b>31.8</b>	<b>24.4</b>	<b>40.8</b>	<b>43.4</b>	<b>36.4</b>	<b>0.0</b>	<b>0.2</b>	<b>13.2</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 U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>												<b>2016</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
MMSA AA	20	157	0.0	10.5	15.0	18.8	25.0	40.6	40.0	30.0	20.0	0.0	0.0

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data sample of 20 loans.  
Due to rounding, totals may not equal 100.0*

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>												<b>2017-2018</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
MMSA AA	21	162	0.0	11.6	0.0	17.5	19.0	37.4	28.6	33.2	52.4	0.4	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data sample of 21 loans.  
Due to rounding, totals may not equal 100.0*

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2016</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
MMSA AA	20	157	100.0	26.1	35.0	14.8	30.0	16.7	30.0	42.4	5.0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>157</b>	<b>100.0</b>	<b>26.1</b>	<b>35.0</b>	<b>14.8</b>	<b>30.0</b>	<b>16.7</b>	<b>30.0</b>	<b>42.4</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data sample of 20 loans.  
Due to rounding, totals may not equal 100.0*

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2017-2018</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
MMSA AA	21	162	100.0	26.4	19.0	14.7	42.9	16.0	28.6	42.9	9.5	0.0	0.0	
<b>Total</b>	<b>21</b>	<b>162</b>	<b>100.0</b>	<b>26.4</b>	<b>19.0</b>	<b>14.7</b>	<b>42.9</b>	<b>16.0</b>	<b>28.6</b>	<b>42.9</b>	<b>9.5</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data sample of 21 loans.  
Due to rounding, totals may not equal 100.0*