



## **PUBLIC DISCLOSURE**

January 7, 2019

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

First Federal Savings & Loan Association  
Charter Number 702753

5 East Main Street  
Centerburg, Ohio 43011

Office of the Comptroller of the Currency

Central Ohio Field Office  
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

<b>OVERALL CRA RATING .....</b>	<b>1</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>2</b>
<b>DESCRIPTION OF INSTITUTION .....</b>	<b>6</b>
<b>SCOPE OF THE EVALUATION.....</b>	<b>7</b>
<b>DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>8</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....</b>	<b>9</b>
<b>LENDING TEST .....</b>	<b>9</b>
<b>APPENDIX A: SCOPE OF EXAMINATION.....</b>	<b>A-1</b>
<b>APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....</b>	<b>B-1</b>
<b>APPENDIX C: TABLES OF PERFORMANCE DATA .....</b>	<b>C-1</b>

## Overall CRA Rating

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

- First Federal Savings & Loan Association's (First Federal or the bank) lending performance reflects a satisfactory response to community credit needs.
- The loan-to-deposit (LTD) ratio is reasonable.
- The bank originated a majority of its loans inside its assessment area (AA).
- Lending to borrowers of different income levels reflects reasonable distribution.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

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

**Tier 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.

## Description of Institution

First Federal is a mutual savings and loan association. Its main and only office is located in Centerburg, Ohio, in an upper-income census tract. The bank reported total assets of \$23.2 million as of September 30, 2018. The bank has no holding company, nor does it have any affiliates. The bank offers home, farm and consumer loans, with lending focused heavily on home loans including 1-4 family residential mortgages, home improvement loans, and refinances. Deposit services are limited to savings and other time deposits. First Federal does not offer services through automated teller machines (ATMs). First Federal did not have any merger or acquisition activity during the evaluation period.

First Federal has designated one AA in a non-Metropolitan Statistical Area (MSA). This AA consists of two census tracts (one middle-income and one upper-income) in the southwestern corner of Knox County and one census tract (middle-income) in southeastern Morrow County. The census tract in Morrow County is located in the Columbus, OH MSA 18140. This census tract does not extend substantially beyond the non-MSA boundary of Knox County. Therefore, it was included in the non-MSA AA. The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- or moderate-income areas. Bank management selected this AA based on the bank's targeted lending territory and office location.

Competition in the AA is strong with many financial institutions including national banks, savings and loans, and branches of large financial institutions. According to the June 30, 2018 Deposit Market Share Report from the Federal Deposit Insurance Corporation (FDIC), First Federal had approximately a 1.7 percent deposit market share in Knox County and ranked 10<sup>th</sup> of 14 financial institutions.

The percentage of total assets represented by total loans is 65 percent. According to the September 30, 2018 call report, the loan portfolio consists of approximately 87.4 percent residential real estate loans, 10.9 percent agriculture loans, less than 1 percent commercial loans, and less than 1 percent consumer loans (broken down by dollar amount). Tier 1 capital is \$4.7 million.

First Federal's previous CRA evaluation was conducted as of April 21, 2014, and resulted in a Satisfactory rating. Presently, there are no legal or financial impediments to First Federal's ability to meet the credit needs in its AAs.



## **Scope of the Evaluation**

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

We conducted a full-scope CRA evaluation to assess the bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas. We used the small savings association CRA evaluation procedures to assess the bank's performance. We reviewed loan information for the Lending Test from 2016, 2017 and 2018 (lending evaluation period), and considered residential real estate because it is by far the primary product offered by the bank, making up 87.4 percent of the loan portfolio by dollar amount. For analysis purposes, we used the 2010 U.S. Census data for loans originated and purchased in 2016, and the 2015 American Community Survey (ACS) Census data for loans originated and purchased in 2017 – 2018.

### **Data Integrity**

The bank is not a HMDA or CRA loan data reporter. Therefore, we reviewed all 2018 residential real estate loans. We reviewed source documentation for each of the loans in our sample in comparison to the bank's tracking spreadsheets, and did not note any data integrity issues.

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

We completed a full-scope review of the bank's only AA, the non-MSA AA described within the Description of Institution section of this report.

### **Ratings**

The bank's overall rating is based on the review of the non-MSA AA.

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

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

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

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

Based on the criteria for the CRA lending test, this bank's lending performance is satisfactory.

#### Loan-to-Deposit Ratio

First Federal's LTD ratio is reasonable and meets the standards for satisfactory performance. The bank's LTD ratio during the evaluation period ranged from a high of 83 percent as of September 30, 2018, to a low of 62.6 percent as of March 30, 2014. First Federal had an average LTD ratio of 73.7 percent, calculated over a 19 quarter period from the 1<sup>st</sup> quarter of 2014 to the 3<sup>rd</sup> quarter of 2018. This is reasonable and similar to the average LTD ratio of its peer group (similarly sized central Ohio thrifts and banks), which was 74.9 percent.

#### Lending in Assessment Area

First Federal's record of lending within its AA is satisfactory with a majority of lending inside the AA. Table D details First Federal's lending activity during the evaluation period by the number of loans originated and dollar volume.

Table D - Lending in Knox County AA										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Residential RE										
2016	15	60%	10	40%	25	\$2,059	48%	\$2,268	52%	\$4,327
2017	11	50%	11	50%	22	\$1,152	43%	\$1,549	57%	\$2,701
2018	13	45%	16	55%	29	\$2,050	51%	\$1,980	49%	\$4,030
Totals	39	51%	37	49%	76	\$5,261	48%	\$5,797	52%	\$11,058

Source: Loan sample.

#### Lending to Borrowers of Different Incomes

First Federal's record of lending to borrowers of different income levels reflects reasonable distribution.

First Federal's home mortgage lending to low- and moderate-income borrowers in 2016 is overall reasonable. The bank's lending to low- and moderate-income borrowers is less than the percentage of low- and moderate-income families in the AA, but is considered reasonable. The bank originated 15 home mortgage loans inside the bank's

AA during this time period. Of these 15 loans, the bank originated one to a low-income borrower and two to moderate-income borrowers. We note that the 7.6 percent poverty rate for families below the poverty level may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards. Approximately 14.6 percent of the total housing units in the AA are occupied rental units. Additionally, the bank has only one office and it is located in an upper-income census tract.

We also considered the median price of housing in the AA in 2016 relative to the maximum income of borrowers in the low- and moderate-income category, which may demonstrate a barrier to homeownership. According to the 2010 U.S. Census data, the median housing value in the AA was \$158,567. Based on the 2016 median family income of \$55,400, low-income families make less than \$27,700 and moderate-income families make less than \$44,320. Overall median housing values are approximately 3.6 to 5.7 times the annual income of low- and moderate-income families in the AA, which may have a limiting effect on mortgage demand among low- and moderate-income families.

First Federal's home mortgage lending to low- and moderate-income borrowers in 2017 and 2018 is reasonable. The bank's lending to low-income borrowers is commensurate with aggregate data, but is less than the percentage of low-income families in the AA. First Federal's lending to moderate-income borrowers exceeds aggregate data and the percentage of moderate-income families in the AA. We note that the 8.2 percent poverty rate for families below the poverty level may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards.

We also considered the median price of housing in the AA in 2017 relative to the maximum income of borrowers in the low- and moderate-income category, which may demonstrate a barrier to homeownership. According to the 2015 U.S. Census data, the median housing value in the AA in 2017 was \$154,836. Based on the 2017 median family income of \$57,600, low-income families make less than \$28,800 and moderate-income families make less than \$46,080. Overall median housing values are approximately 3.4 to 5.4 times the annual income of low- and moderate-income families in the AA, which may have a limiting effect on mortgage demand among low- and moderate-income families.

Refer to Table P in appendix C for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

### **Geographic Distribution of Loans**

An analysis of geographic distribution was not meaningful because there are no low- or moderate-income census tracts within the AA. The lending analysis reflected lending in all census tracts, with no conspicuous gaps in lending.

Refer to Table O in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

### **Responses to Complaints**

First Federal did not receive any complaints about its performance in helping to meet AA credit needs during the evaluation period.

## 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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 1/1/2016 to 12/31/2018	
<b>Financial Institution:</b>		<b>Products Reviewed:</b>
First Federal Savings & Loan Association (First Federal) Centerburg, Ohio		Residential Real Estate
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Ohio Ohio non-MSA      #NA	Full Scope	Knox County

# Appendix B: Community Profiles for Full-Scope Areas

## First Federal Centerburg – Knox County AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Knox County AA- 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	66.7	33.3	0.0
Population by Geography	15,815	0.0	0.0	59.2	40.8	0.0
Housing Units by Geography	5,870	0.0	0.0	63.0	37.0	0.0
Owner-Occupied Units by Geography	4,782	0.0	0.0	64.6	35.4	0.0
Occupied Rental Units by Geography	855	0.0	0.0	60.6	39.4	0.0
Vacant Units by Geography	233	0.0	0.0	38.6	61.4	0.0
Businesses by Geography	844	0.0	0.0	57.6	42.4	0.0
Farms by Geography	117	0.0	0.0	53.0	47.0	0.0
Family Distribution by Income Level	4,298	17.0	17.9	21.4	43.7	0.0
Household Distribution by Income Level	5,637	16.5	12.8	18.6	52.1	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$69,100	Median Housing Value			\$158,567
Median Family Income Non-MSAs - OH		\$55,400	Median Gross Rent			\$694
			Families Below Poverty Level			7.6%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Knox County- 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	66.7	33.3	0.0
Population by Geography	16,004	0.0	0.0	60.3	39.7	0.0
Housing Units by Geography	6,066	0.0	0.0	60.1	39.9	0.0
Owner-Occupied Units by Geography	4,574	0.0	0.0	60.2	39.8	0.0
Occupied Rental Units by Geography	960	0.0	0.0	58.4	41.6	0.0
Vacant Units by Geography	532	0.0	0.0	62.4	37.6	0.0
Businesses by Geography	847	0.0	0.0	57.1	42.9	0.0
Farms by Geography	123	0.0	0.0	54.5	45.5	0.0
Family Distribution by Income Level	4,191	13.4	20.3	20.6	45.8	0.0
Household Distribution by Income Level	5,534	16.6	13.7	20.3	49.4	0.0

Median Family Income MSA - 18140 Columbus, OH MSA	\$73,900	Median Housing Value	\$154,836
Median Family Income Non-MSAs - OH	\$57,600	Median Gross Rent	\$686
		Families Below Poverty Level	8.2%
<i>Source: 2015 ACS Census and 2017 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>			

<b>Table B – Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>Columbus, OH MSA Median Family Income (18140)</b>				
2016 (\$69,100)	<\$34,550	\$34,550 to <\$55,280	\$55,280 to <\$82,920	≥\$82,920
<b>OH NA Median Family Income (99999)</b>				
2016 (\$55,400)	<\$27,700	\$27,700 to <\$44,320	\$44,320 to <\$66,480	≥\$66,480
<i>Source: FFIEC</i> <i>Due to rounding, totals may not equal 100.0</i>				

<b>Table B – Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>Columbus, OH MSA Median Family Income (18140)</b>				
2017 (\$73,900)	<\$36,950	\$36,950 to <\$59,120	\$59,120 to <\$88,680	≥\$88,680
<b>OH NA Median Family Income (99999)</b>				
2017 (\$57,600)	<\$28,800	\$28,800 to <\$46,080	\$46,080 to <\$69,120	≥\$69,120
<i>Source: FFIEC</i> <i>Due to rounding, totals may not equal 100.0</i>				

First Federal is a mutual savings and loan association, which has one location in Centerburg, Ohio. The bank operates in a single non-MSA AA and reported total assets of \$23.2 million as of September 30, 2018. First Federal has designated one AA in a non-MSA. Bank management selected this AA based on the bank's targeted lending territory and office location.

Knox County had an unemployment rate of 4.6 percent as of December 2018. While above the national unemployment rate of 3.8 percent, it is below the 4.8 percent unemployment rate for the state of Ohio. Major employers include Ariel Corporation, Knox Community Hospital, Kenyon College and Jeld-Wen, Inc.

Community contacts indicate that Knox County is primarily an agricultural area with heavy manufacturing. The local economy has weathered the recession well. There is available affordable housing, and a large housing market priced above \$350,000. However, there is lesser availability of housing priced at an intermediate level under \$350,000. One contact



stated that the area could benefit from additional affordable housing. Another contact stated that he feels each financial institution in the local area has its own niche within the community and they each serve that niche well. Contacts agreed that the financial institutions are active within the community, have a positive reputation, and serve the needs of the community well overall.

## Appendix C: 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 areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

- Table 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 MA/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>2016</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% 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
Knox County AA	15	2,059	100.0	--	0.0	0.0	--	0.0	0.0	--	64.6	20.0	--	35.4	80.0	--	0.0	--	--
<b>Total</b>	<b>15</b>	<b>2,059</b>	<b>100.0</b>	<b>--</b>	<b>0.0</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	<b>0.0</b>	<b>--</b>	<b>64.6</b>	<b>20.0</b>	<b>--</b>	<b>35.4</b>	<b>80.0</b>	<b>--</b>	<b>0.0</b>	<b>--</b>	<b>--</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>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% 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
Knox County AA	24	3,202	100.0	528	0.0	0.0	0.0	0.0	0.0	0.0	60.2	33.3	59.8	39.8	66.7	40.2	0.0	--	0.0
<b>Total</b>	<b>24</b>	<b>3,202</b>	<b>100.0</b>	<b>528</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>	<b>60.2</b>	<b>33.3</b>	<b>59.8</b>	<b>39.8</b>	<b>66.7</b>	<b>40.2</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 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>																		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$ (000s)	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Knox County AA	15	2,059	100.0	17.0	6.7	--	17.9	13.3	--	21.4	20.0	--	43.7	60.0	--	0.0	0.0	--
<b>Total</b>	<b>15</b>	<b>2,059</b>	<b>100.0</b>	<b>17.0</b>	<b>6.7</b>	<b>--</b>	<b>17.9</b>	<b>13.3</b>	<b>--</b>	<b>21.4</b>	<b>20.0</b>	<b>--</b>	<b>43.7</b>	<b>60.0</b>	<b>--</b>	<b>0.0</b>	<b>0.0</b>	<b>--</b>

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank 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>		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Knox County AA	24	3,202	100.0	528	13.4	4.2	4.2	20.3	20.8	15.5	20.6	12.5	28.2	45.8	62.5	39.6	0.0	0.0	12.5		
<b>Total</b>	<b>24</b>	<b>3,202</b>	<b>100.0</b>	<b>528</b>	<b>13.4</b>	<b>4.2</b>	<b>4.2</b>	<b>20.3</b>	<b>20.8</b>	<b>15.5</b>	<b>20.6</b>	<b>12.5</b>	<b>28.2</b>	<b>45.8</b>	<b>62.5</b>	<b>39.6</b>	<b>0.0</b>	<b>0.0</b>	<b>12.5</b>		

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