



PUBLIC DISCLOSURE

March 28, 2022

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

**Auto Club Trust, FSB
Charter Number: 715850
1 Auto Club Drive
Dearborn, MI 48126**

Office of the Comptroller of the Currency
200 Public Square Suite 1610
Cleveland, OH 44114-2301

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.....	2
Description of Institution.....	3
Scope of the Evaluation.....	4
Discriminatory or Other Illegal Credit Practices Review.....	5
State Rating.....	6
State of Michigan.....	6
Community Development Test	10
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	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 Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the reasonable distribution of home mortgage loans and consumer loans among borrowers of different incomes, reasonable geographic distribution of home mortgages and consumer loans, and a reasonable loan-to-deposit (LTD) ratio. The bank's lending is consistent with their business model directed to AAA members.
- The Community Development (CD) Test rating is based on an adequate responsiveness to community needs through qualified CD loans, investments, and services given the bank's capacity and the need and availability of such opportunities in the bank's assessment area (AA).
- The bank did not receive any complaints pertaining to CRA during the evaluation period.

Loan-to-Deposit Ratio

Auto Club Trust, FSB's (ACT or bank) LTD ratio is reasonable given the bank's size, financial condition, and credit needs of its AA. The LTD ratio is calculated on a bank-wide basis and meets the standard for satisfactory performance. During the evaluation period of January 1, 2019, through December 31, 2021, the bank's average quarterly LTD ratio was 76.12 percent, with quarterly ratios ranging from 70.97 percent to 83.25 percent. In comparison, the average quarterly LTD ratios for two similarly situated institutions in the bank's AA were 78.5 percent and 109.4 percent, respectively.

Lending in Assessment Area

A substantial majority of ACT's reportable home mortgage and consumer loans were made outside of its AA. This low percentage of loans inside the AA correlates with ACT's regional home mortgage and auto lending business model. The bank's business model and strategic focus is reliant upon delivering banking products electronically to AAA members in fourteen states and two territories. As a result, the low percentage of lending in the AA had a neutral impact on our lending test conclusion.

During the evaluation period, the bank originated and purchased 10.2 percent by number and 6.8 percent by dollar amount of its total loans inside the bank's AA. This analysis is performed at the bank level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - 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										
2019	13	22.8	44	77.2	57	1,616	19.6	6,623	80.4	8,239
2020	21	7.3	268	92.7	289	4,031	6.1	62,007	93.9	66,038
2021	45	7.4	562	92.6	607	6,624	5.8	106,988	94.2	113,612
Subtotal	79	8.3	874	91.7	953	12,271	6.5	175,617	93.5	187,888
Auto Loans	29	28.7	72	71.3	101	653	29.3	1,579	70.7	2,232
Subtotal	29	28.7	72	71.3	101	653	29.3	1,579	70.7	2,232
Total	108	10.2	946	89.8	1054	12,924	6.8	177,196	93.2	190,120
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

Auto Club Trust, FSB is a full-service intrastate, federally chartered thrift institution headquartered in Dearborn, MI. ACT is a wholly owned subsidiary of Auto Club Insurance Association (ACIA) and Auto Club Service, Inc. which own 80.4 and 19.6 percent, respectively. Auto Club Service, Inc. is 100 percent owned by The Auto Club Group (ACG), a Michigan nonprofit membership organization, servicing AAA members in fourteen states and two territories. ACIA, ACG, and Auto Club Services, Inc. all operate under the American Automobile Association (AAA) brand.

As of December 31, 2021, the bank's assets totaled \$579.5 million, and tier one capital totaled \$53.5 million or 9.1 percent of total assets. The bank's one assessment area (AA) serves all of Wayne County, Michigan. ACT only has one branch office located at its headquarters in Dearborn, Michigan, which is not easily visible from the exterior of the building. This is a full-service branch with an ATM but no drive-up, and it is located in an upper-income census-tract (CT).

ACT's primary loan products are residential real estate loans and consumer loans. From January 1, 2019, to December 31, 2021, the bank's loan portfolio decreased 20.3 percent to \$282.9 million. As of December 31, 2021, the loan portfolio was comprised of real estate loans (\$104.5 million or 36.9 percent) and consumer loans (\$178.4 million or 63.1 percent).

ACT's strategy is to be a direct/digital, branch-lite bank which provides a full range of AAA-branded banking products to AAA members. Management has implemented a technological core platform that has substantially transformed into full digital banking business offerings. ACT offers banking services for deposits, auto lending, mortgages, credit cards, and trust and investments. ACT's deposit offerings consist of checking, savings and time accounts. Deposit account features include a mobile application, online account opening, remote deposit capture, bill pay, account transfers, and account alerts. Auto lending includes online auto shopping and consumer education, and full-service financing for new/used auto loans with a variety of term structures. The online mortgage loan origination platform allows contactless origination and servicing. It also provides education tools for members to better understand the borrowing process and find a home and product. Products are primarily conforming conventional loans with a fixed-

rate structure, which are originated and sold via correspondent relationships. The bank also offers credit cards through a co-branded program with US Bank. Trust and Investment services includes investment services, individual retirement accounts, financial planning, and trust and estate administration.

There are no legal, financial, or other factors impeding ACT's ability to help meet the credit needs of the AA during the evaluation period. The bank received a "Satisfactory" rating on their previous CRA performance evaluation dated March 18, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses ACT's record of meeting the credit needs of its AA. We performed this review using Intermediate-Small Bank CRA procedures, which included a lending test and a CD test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities and uses home mortgage loans reported by the bank under the Home Mortgage Disclosure Act (HMDA) and a sample of consumer (auto) loans. The CD test evaluates the bank's responsiveness to CD needs in its AA through qualified lending, investments, donations, and services. The evaluation period for both lending and CD activity covers January 1, 2019, to December 31, 2021. Based on the bank's internal reports for lending activity and discussions with senior management, we determined that the bank's primary lending focus during the evaluation period was home mortgage and consumer loans. The bank does not offer non-residential real estate, commercial, or agricultural loans.

We also used other supporting information while evaluating ACT's CRA performance, including 2010 U.S. Census data, 2015 American Community Survey (ACS) census data, internal bank records, deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AA. We also considered information from community contacts to help assess the needs of the bank's AA and opportunities for financial institutions to lend and provide CD services within these areas.

Selection of Areas for Full-Scope Review

ACT has one AA in Wayne County, Michigan and we performed a full-scope review of the AA. Please refer to *Appendix A, Scope of Examination*, for more information.

Ratings

The bank's overall rating is based on performance within the bank's only AA. In reaching our conclusion, we considered information from the following performance criteria when analyzing the bank's primary lending products: LTD ratio, lending within the AA, lending to borrowers of different incomes, and the geographic distribution of loans.

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 Michigan

CRA rating for the State of Michigan: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's distribution of home mortgage loans and consumer loans to borrowers of different income levels is reasonable.
- The bank's geographic distribution of home mortgage loans and consumer loans is reasonable.
- The bank's LTD ratio is reasonable.
- The bank made an adequate level of CD loans and investments.
- The bank did not receive any complaints regarding its performance in helping meet the credit needs within its AA during the evaluation period.

Description of Institution's Operations in Michigan

ACT's AA within the state of Michigan consists of Wayne County. Wayne County is a part of the Detroit-Dearborn-Livonia, MI Metropolitan Division (MD) within the Detroit-Warren- Dearborn, MI MSA. The AA does not arbitrarily exclude any low- or moderate-income CTs. The AA is located in southeastern Michigan and includes both urban and suburban neighborhoods. Detroit is the primary city within the AA and contains most of the AA's low- and moderate-income CT's. Based on the 2015 ACS, the AA consists of 611 CTs, including 126 low-income CTs, 174 moderate-income CTs, 121 middle-income CTs and 173 upper-income CTs. Seventeen CTs have no income designation.

According to the 2015 ACS, the AA contains approximately 17.8 percent of the state's population, which equates to 1,778,969 persons and 416,796 families. In aggregate, 41.1 percent of families in the AA were designated low- or moderate-income, and 19.9 percent of families lived below the poverty level. Living below poverty creates a barrier for home ownership, making it especially difficult for this segment of the population to afford and maintain a home. See the tables below for additional detail on the percentage of families in each income level within the AA. The number of owner-occupied housing units in the AA was 420,777. The percentage of owner-occupied housing units in the AA's low- and moderate-income CT's was 10.0 percent and 21.5 percent, respectively. The median income was \$52,733 based on the 2015 ACS.

Better opportunities for mortgage lending exist in the middle- and upper-income CTs within this AA, as those geographies contained over 68.2 percent of the owner-occupied housing units in the AA during the evaluation period. Conversely, the greatest percentages of rental and vacant housing units are in low- and moderate-income CTs. Furthermore, households considered to be below the poverty level are primarily located within the low- and moderate- income CTs of the AA.

Economic conditions in the AA prior to the COVID-19 Pandemic lagged slightly behind the state of Michigan. According to the U.S. Bureau of Labor Statistics, Wayne County’s unadjusted unemployment rate was 5.8 percent at the start of 2019 compared to 4.9 percent for the state of Michigan. The AA was significantly impacted by the COVID-19 Pandemic. At its peak, the AA’s unemployment rate was 27.4 percent, and then declined over the rest of the evaluation period. As of December 31, 2021, the AA’s unemployment rate fell to 5.4 percent but still exceeded the state unemployment rate of 4.2 percent. The major employers in the AA include Ford Motor Company, Beaumont Health, Johnson Controls, U.S Steel Dearborn Public Schools, and Henry Ford Health System.

Significant competition for loans exists in the AA. According to the June 30, 2021, FDIC Deposit Market Share Report, there are 19 institutions with 278 offices serving the county. ACT has the 9th largest deposit market share with 0.43 percent. JPMorgan Chase, Comerica, Huntington National Bank, Bank of America, and PNC are the top five institutions in terms of market share, controlling 92.4 percent of deposits in the AA and operating 191 offices. The 2020 peer mortgage data shows 510 lenders (including non-depository institutions) that originated or purchased loans within the AA. The top five lenders accounted for 34.4 percent of the number of loans originated or purchased. ACT is ranked 186th with 0.03 percent of the mortgage loan market share.

We considered information obtained from two community organizations within the AA to gain an understanding of the CD needs and credit opportunities of the AA. Both were affordable housing organizations that identified funds and grants for maintenance and rehabilitation of housing, flexible and creative small mortgages, and general operating funds as opportunities for assistance with the credit needs of the AA. Other opportunities include investment in the operation of affordable housing organizations, providing support for emergency utility assistance, and funding homeownership counseling and financial education programs.

Wayne County AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: ACT - Wayne County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	611	20.6	28.5	19.8	28.3	2.8
Population by Geography	1,778,969	16.0	26.5	22.6	34.4	0.5
Housing Units by Geography	817,593	18.6	28.0	21.5	31.1	0.8
Owner-Occupied Units by Geography	420,277	10.0	21.5	24.6	43.6	0.3
Occupied Rental Units by Geography	246,998	24.3	32.0	21.0	21.7	1.0
Vacant Units by Geography	150,318	33.0	39.9	13.6	11.9	1.6
Businesses by Geography	125,740	12.4	21.1	21.2	44.5	0.9
Farms by Geography	2,022	8.4	18.3	23.9	49.0	0.4
Family Distribution by Income Level	416,796	25.9	15.2	16.4	42.5	0.0
Household Distribution by Income Level	667,275	27.4	14.3	15.3	43.0	0.0
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI		\$52,733	Median Housing Value			\$88,250
			Median Gross Rent			\$803

	Families Below Poverty Level	19.9%
<i>Source: 2015 ACS and 2021 D&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 Michigan

This analysis reflects a full-scope review of the one AA in Michigan, Wayne County AA, from 2019-2021. To develop our conclusions, we gave consideration to factors within the Wayne County community profile that would impact the bank's ability to lend within AA. We also considered the number of home mortgage loans originated or purchased by ACT and auto loans originated during the review period. Refer to *Appendix A - Scope of Examination*, for more information on this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

The bank's performance under the Lending Test in Michigan is rated Satisfactory.

In determining our rating, we weighed demographic factors in the AA that could affect the bank's ability to lend. These factors include the bank's business model, competition from large institutions, the number of low- and moderate-income CTs, branch presence, area demographics, and the location of most owner-occupied housing. We also considered the bank's market share in low- and moderate-income CTs.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Michigan is reasonable.

Distribution of Loans by Income Level of the Geography

ACT exhibits reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in the state of Michigan section of *Appendix D* for the facts and data used to evaluate ACT's geographic distribution of home mortgage loan originations and purchases.

The bank's distribution of home mortgage loans among geographies of different income levels in the AA is reasonable. The bank's percentage of home mortgage loans among geographies of low-income CTs in the AA was 3.8 percent. This is below the 10.0 percent of the AA owner-occupied housing units in low-income CTs geographies but exceeds the 2.1 percent of aggregate bank lending. The bank's percentage of home mortgage loans among geographies of moderate-income CTs in the AA was 13.9 percent. This is below the 21.5 percent of the AA owner-occupied housing units in moderate-income geographies but significantly above the 6.7 percent of aggregate bank lending.

Consumer Loans

Refer to Table U in the state of Michigan section of *Appendix D* for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The bank's distribution of consumer loans among geographies of different income levels is reasonable. The bank's percentage of consumer loans in low-income CTs in the AA was 3.5 percent. This is below the 15.3 percent of the AA households in the low-income CTs geographies. The bank's percentage of consumer loans among geographies of moderate-income CTs in the AA was 13.8 percent. This is below the 25.4 percent of the AA households in moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank and the bank's capacity to lend.

Home Mortgage Loans

Refer to Table P in the state of Michigan section of *Appendix D* for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The bank's distribution of home mortgage loans to borrowers of different income levels in the AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 5.2 percent. This is significantly below the 25.9 percent of low-income families living in the AA, but above the 3.4 percent aggregate bank lending. The bank's percentage of home mortgage loans to moderate-income borrowers is excellent at 25.3 percent, which is significantly above the 15.2 percent of moderate-income families living in the AA, and the 12.6 percent aggregate bank lending.

Consumer Loans

Refer to Table V in the state of Michigan section of *Appendix D* for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The bank's distribution of consumer loans to borrowers of different income levels in the AA is reasonable. The bank's percentage of consumer loans to low-income borrowers was 3.5 percent. This is significantly below the 27.4 percent of low-income households in the AA. The bank's percentage of consumer loans to moderate-income borrowers is excellent at 34.5 percent, which is significantly above the 14.3 percent of moderate-income households in the AA.

Responses to Complaints

ACT did not receive any complaints pertaining to the Community Reinvestment Act during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Michigan is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for CD in the bank’s AA.

Number and Amount of Community Development Loans

Refer to the CD Loan table below for the facts and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, ACT made a relatively low level of CD loans which had a neutral impact on its overall lending performance in the AA. ACT originated one qualifying CD loan totaling \$350,000. The loan was for a consortium providing affordable home mortgages to LMI borrowers in the AA.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Wayne County AA	1	100	\$350	100

Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, sets forth the information and data used to evaluate the bank’s level of CD investments.

During the evaluation period, ACT made a relatively low level of CD investments which had a neutral impact on its overall lending performance in the AA. The bank made one qualified investment totaling approximately \$1.1 million. ACT also made \$127,000 in aggregate donations within the AA.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Wayne County AA	0	0	8	\$1,225	8	100	\$1,225	100	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Extent to Which the Bank Provides Community Development Services

ACT's overall performance in providing qualified CD services is adequate. ACT only has one branch office located at its headquarters in Dearborn, Michigan, which is not visible outside of the building. It is a full-service branch with an ATM but no drive-up. The bank has a unique customer base due to the bank's strategy to be a direct/digital, branch-lite bank which provides a full range of AAA-branded banking products to AAA members. The bank has implemented a leading technological core platform and has substantially transformed into a full digital banking business offering.

Community Development Services

During the evaluation period, ACT provide a relatively low level of CD services which had a neutral impact on its overall lending performance in the AA. ACT originated 19 qualifying CD services totaling 48.5 hours. The services were for financial education for first time homebuyers and students in the AA. When determining the adequacy of CD services, we considered the impact of the COVID-19 pandemic which limited the opportunity for CD service hours.

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 MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	(01/01/19 to 12/31/21)	
Bank Products Reviewed:	Home mortgage and consumer loans Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State		
Michigan		
-Wayne County	Full-Scope	Part of the Detroit-Warren-Dearborn, MI MSA

Appendix B: Summary of MMSA and State Ratings

RATINGS Auto Club Trust, FSB			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Auto Club Trust, FSB	Satisfactory	Satisfactory	Satisfactory
State: Michigan	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

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

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

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

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

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

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

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

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

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

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

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

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2019-21

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
ACT - Wayne County AA	79	12,271	100.0	60,987	10.0	3.8	2.1	21.5	13.9	6.7	24.6	27.8	22.0	43.6	54.4	69.1	0.3	0.0	0.1
Total	79	12,271	100.0	60,987	10.0	3.8	2.1	21.5	13.9	6.7	24.6	27.8	22.0	43.6	54.4	69.1	0.3	0.0	0.1

Source: 2015 ACS Census ; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2019-21

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
ACT - Wayne County AA	79	12,271	100.0	60,987	25.9	5.2	3.4	15.2	25.3	12.6	16.4	17.7	19.6	42.5	49.4	48.3	0.0	4.5	16.2
Total	79	12,271	100.0	60,987	25.9	5.2	3.4	15.2	25.3	12.6	16.4	17.7	19.6	42.5	49.4	48.3	0.0	4.5	16.2

Source: 2015 ACS Census ; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-21	
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	
ACT - Wayne County AA	29	653	100	15.3	3.5	25.4	13.8	23.3	17.2	35.5	65.5	0.6	0.0	
<i>Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-21	
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	
ACT - Wayne County AA	29	653	100	27.4	3.5	14.3	34.5	15.3	24.1	43.0	37.9	0.0	0.0	
Total	29	653	100	27.4	3.5	14.3	34.5	15.3	24.1	43.0	37.9	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%</i>														