



PUBLIC DISCLOSURE

October 30, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Kentland Federal Savings and Loan Association
Charter Number 702228

116 North 3rd Street
Kentland, Indiana 47951-1212

Office of the Comptroller of the Currency

Downers Grove Office
2001 Butterfield Road, Suite 400
Downers Grove, Illinois 60515

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Needs to Improve**.

The Lending Test is rated: Needs to Improve.

The Lending Test rating is based on Kentland Federal Savings and Loan Association (Kentland FSLA or bank) needs to improve performance in the State of Indiana. The major factors that support this rating include:

- A substantial majority of the bank's home mortgage loans were originated outside the assessment area (AA).
- Kentland FSLA did not originate a sufficient volume of loans to conduct a geographic or borrower distribution of home mortgage loans.
- Kentland FSLA's loan-to deposit ratio is more than reasonable.
- The bank did not receive any CRA-related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering Kentland FSLA's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is more than reasonable. The bank's quarterly loan-to-deposit ratio averaged 125.6 percent over the 12-quarter period ending December 31, 2021. Over this period, the bank's quarterly loan-to-deposit ratio ranged from a low of 100.1 percent to a high of 147.1 percent.

We analyzed the quarterly loan-to-deposit ratios of two peer banks headquartered within the bank's AA with assets of \$350 million or less. The combined average quarterly loan-to-deposit ratio for these peer banks was 73.9 percent over the same evaluation period. The peer banks' average quarterly loan-to-deposit ratios ranged between a low of 63.1 percent and a high of 84.8 percent. Kentland FSLA's total assets are the smallest in this group, and its loan-to-deposit ratio is the highest.

Lending in Assessment Area

A substantial majority of the bank's loans are outside its AA. Kentland FSLA originated and purchased only 33.3 percent of its total loans inside its AA during the evaluation period. This analysis is performed at the bank level rather than at 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 Loans	2	33.3	4	66.7	6	190	24.2	595	75.8	785

Source: Evaluation Period 1/1/2019-12/31/2021 Bank Data, Sample of 6 Home Mortgage Loans (100% of originations 2019-2021.)

Description of Institution

Kentland FSLA is a \$3 million federally chartered, mutual savings association operating a single office in Kentland, Indiana. Kentland FSLA offers limited products and services centered in single-family residential real estate loans, commercial real estate loans, certificates of deposit, and savings accounts. The bank has no automated teller machines (ATMs) and does not offer digital, mobile, or telephone banking. There were no changes to the AA during the evaluation period. The bank's AA consists of Newton County, within the Gary, Indiana Metropolitan Division (MD) of the Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area (MSA). The bank has no affiliates.

As of December 31, 2021, Kentland FSLA's loan portfolio totaled \$2.4 million, or 80.4 percent of total assets. The bank's loan portfolio mix was comprised of 98 percent residential real estate loans and 2 percent business loans. Tier 1 capital was \$471,000.

Kentland FSLA's business strategy is focused on residential mortgage lending. At the previous CRA evaluation dated October 21, 2019, the OCC assigned Kentland FSLA a "Satisfactory" rating under the small bank evaluation procedures. The bank's ability to meet the credits of the AA are impacted by its financial condition, small asset size, high loan-to-deposit ratio, limited loan and deposit products, and significant local competition.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation addresses Kentland FSLA's CRA performance from January 1, 2019, through December 31, 2021. The OCC evaluated the bank's CRA performance using Interagency Small Bank examination procedures, which evaluates the bank's record of meeting the credit needs of its AA through lending activities. Based on our review of loan origination data, Kentland FSLA's primary lending product was home mortgage loans. During the evaluation period, the bank did not originate a sufficient number of loans to provide meaningful analysis for the Lending Test. Please refer to the table in Appendix A for more information on the scope of the review.

Selection of Areas for Full-Scope Review

Kentland FSLA has one AA in the State of Indiana, and the OCC completed a full-scope review of that AA. A community profile for the AA is provided in the "Scope" section in the State of Indiana portion of this evaluation.

Ratings

Kentland FSLA's overall rating is based on the full-scope review of the AA in the State of Indiana. Under the interagency small bank CRA procedures, examiners assess the reasonableness of the bank's loan-to-deposit ratio and the bank's record of lending within its AA compared to lending outside of its AA. Within the full-scope review area, examiners assess the distribution of lending to geographies and to borrowers of different income levels. As Kentland FSLA did not originate or purchase a sufficient volume of loans to conduct a meaningful analysis of lending to geographies and to borrowers of different income levels, the bank's CRA rating is based on its loan-to-deposit ratio and record of lending in its AA compared to lending outside the AA, with consideration of performance context information.

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 CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the financial institution, or in any AA by an affiliate whose loans have been considered as part of the financial institution'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 Kentland FSLA (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State of Indiana

CRA rating for the State of Indiana: Needs to Improve.

The Lending Test is rated: Needs to Improve.

The major factors that support this rating include:

- Kentland FSLA did not originate a sufficient volume of loans to conduct a geographic or borrower distribution of home mortgage loans.
- The bank did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in Indiana

Kentland FSLA has one AA within the State of Indiana, which consists of the entirety of Newton County, within the Gary, Indiana MD #23844 of the Chicago-Naperville-Elgin, IL-IN-WI MSA #16980. Newton County is located in the northwest corner of the State of Indiana, along the border with the State of Illinois. The bank operates one branch in Kentland, Indiana, which is located in the southwest corner of Newton County approximately five miles from the Illinois state line, 44 miles northwest of Lafayette, Indiana, and 70 miles south of Gary, Indiana. Kentland is the county seat and largest town (population 1,641 in 2020) in Newton County. The bank's operating hours are limited to Monday through Friday from 8:00 a.m. to 3:00 p.m., and special appointments can be made upon request. The bank has no drive up facility or ATMs and does not offer transaction checking accounts. There were no branch openings or closings during the evaluation period.

The AA is comprised of one (25 percent) moderate-income census tract (CT) and three (75 percent) middle-income CTs. There are no low-income or upper-income CTs in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income geographies. The bank is located in a middle-income CT.

Competition

Competition for deposits in the AA is strong among five other significantly larger FDIC-insured financial institutions. According to the June 30, 2021 FDIC Deposit Market Share Report, Kentland FSLA's deposits in the AA totaled \$2.6 million. The bank ranked last out of six institutions in the AA, with a deposit market share of less than 1 percent. The three largest institutions for deposit market share in the AA were Kentland Bank (47.6 percent), Community State Bank (19 percent), and First Financial Bank (14.1 percent).

Competition for loans in the AA is also strong. Based on 2021 aggregate mortgage data, market share data for all Home Mortgage Disclosure Act (HMDA) reporting institutions in the AA shows there were 101 lending institutions that reported originating or purchasing 715 home mortgage loans in the AA. While Kentland FSLA is not subject to the reporting requirements of HMDA, its market share (one loan) was equivalent to less than 1 percent by number of loans originated or purchased. There were 35 other lending institutions that reported only originating or purchasing one home mortgage loan in the AA in 2021. The three competitors by market share were American Financial Network (10.4 percent), Wells Fargo Bank, N.A. (7.2 percent), and Quicken Loans LLC (6.1 percent). Between 2019 and 2021,

HMDA reporting institutions reported originating or purchasing 1,864 home mortgage loans totaling \$2.4 billion in Newton County, reflecting strong demand for home mortgage loans during the evaluation period.

Demographics

Table A – Demographic Information of the Assessment Area						
Assessment Area: Newton County 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	25.0	75.0	0.0	0.0
Population by Geography	14,057	0.0	21.6	78.4	0.0	0.0
Housing Units by Geography	6,040	0.0	23.6	76.4	0.0	0.0
Owner-Occupied Units by Geography	4,062	0.0	22.0	78.0	0.0	0.0
Occupied Rental Units by Geography	1,339	0.0	24.1	75.9	0.0	0.0
Vacant Units by Geography	639	0.0	32.2	67.8	0.0	0.0
Businesses by Geography	974	0.0	24.4	75.6	0.0	0.0
Farms by Geography	136	0.0	33.8	66.2	0.0	0.0
Family Distribution by Income Level	3,739	22.4	24.6	24.3	28.7	0.0
Household Distribution by Income Level	5,401	24.3	20.4	20.4	34.9	0.0
Weighted Average Median Family Income		\$53,106	Median Housing Value			\$108,280
			Median Gross Rent			\$692
			Families Below Poverty Level			9.7%

*Source: 2015 ACS and 2021 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.*

Population

According to the 2015 American Community Survey (ACS) U.S. Census data, the area population was 14,057. There were 3,739 families in the AA, of which 838 (22.4 percent) were low-income; 920 (24.6 percent) were moderate-income; 908 (24.3 percent) were middle-income; and 1,073 (28.7 percent) were upper-income. Median family income was \$53,106. The percentage of families in the AA living below the poverty level was 9.7 percent.

Housing

According to the 2015 ACS U.S. Census, there are 6,040 housing units in the AA. Of the housing units, 67.2 percent are owner-occupied, 22.1 percent are rentals, and 10.7 percent are vacant. The median monthly gross rent is \$692. The median age of housing units in the AA is 59 years with a median value of \$108,280. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. These factors add to the overall cost of homeownership and can have a negative impact on home affordability for low- and moderate-income families.

Based on the information in the table above, low-income families earn less than \$26,553, and moderate-income families earn less than \$42,485. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income. This calculated to a maximum monthly mortgage payment of \$663 for low-income borrowers and \$1,062 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the Newton County AA median housing value would have been \$581. Examiners took into consideration families living below the poverty level who often have difficulty qualifying for home mortgage products without flexible terms or reduced closing costs.

Employment and Economic Factors

Based on data from the U.S. Bureau of Labor Statistics, the annual unemployment rate in the AA was gradually improving until the COVID-19 pandemic that began in March 2020. The unemployment rate in the AA has improved since the peak unemployment rate in April 2020 and was slightly higher than the state average and lower than the national average on December 31, 2021.

Annual Unemployment Rates				
Area	2019	2020	2021	Peak
Newton County	4.1%	7.0%	4.1%	15.1%
State of Indiana	3.3%	7.3%	3.9%	16.4%
National	3.7%	8.1%	5.5%	14.7%

Source: U.S. Department of Labor, Bureau of Labor Statistics. Rates are not seasonally adjusted. Unemployment rates are as of December 31 of each year. Peak is as of April 30, 2021.

Industries driving the local economy include agriculture, manufacturing, retail trade, and healthcare and social assistance. The largest employers in Newton County are Republic C (environmental services), Adkev Inc., George Ade Memorial Health Care Center, and Newton County school districts.

Businesses in the AA include 84.5 percent small businesses with gross annual revenues of \$1 million or less, 3.4 percent businesses with gross annual revenues of over \$1 million, and 12.1 percent where businesses did not report revenue information. According to Dun and Bradstreet (D&B) data as of June 2021, 24.4 percent of businesses were located in the moderate-income CT.

Community Contact

Examiners performed a community contact interview with an economic development organization to determine general banking and credit needs within the AA and opportunities for local financial institutions to meet those needs. Identified credit needs include a need for affordable housing to support increased demand for housing related to new developments in the Newton County Opportunity Zone centered in CT 1007, where Kentland FSLA is located. The State of Indiana designated the Opportunity Zone in Newton County in 2019, and the County has been successful in attracting a lumber distribution company, dress shop, gift shop, restaurant, and intergenerational senior living facility. The contact noted a need for access to government guaranteed home loan programs to assist with affordable home financing for first time homeowners, new families moving to the community, and senior citizens

downsizing to smaller homes. In addition, the contact noted financial support for local economic development organizations is needed to fund ongoing community development and improvement projects, including a wellness center and child-care facility.

Scope of Evaluation in Indiana

Kentland FSLA has one AA in the state of Indiana, and we completed a full-scope review of this AA.

LENDING TEST

The bank's performance under the Lending Test in Indiana is rated Needs to Improve. The bank originated a nominal number of home mortgage loans in the AA during the three year evaluation period. Given the low volume of lending within the AA, examiners were unable to perform a meaningful analysis of the geographic and borrower distributions.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Examiners were unable to conclude on the Distribution of Loans by Income Level of the Geography. Please refer to Table O in Appendix D for the facts and data about the geographic distribution of the bank's home mortgage loans originations and purchases.

Lending Gap Analysis

Examiners were unable to perform a lending gap analysis based on the low volume of lending during the evaluation period.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Examiners were unable to conclude on the Distribution of Loans by Income Level of Borrower. Please refer to Table P in Appendix D for the facts and data about the borrower distribution of the bank's home mortgage loan originations and purchases.

Responses to Complaints

Kentland FSLA did not receive any complaints regarding its CRA performance during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope.”

Time Period Reviewed:	1/1/2019-12/31/2021	
Bank Products Reviewed:	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Indiana		
Newton County AA	Full-Scope	CTs: 1004, 1005, 1006, and 1007
		CT 1005 is designated moderate-income.

Appendix B: Summary of MMSA and State Ratings

RATINGS: Kentland Federal Savings and Loan Association	
Overall Bank:	Lending Test Rating
Kentland FSLA	Needs to Improve
State of Indiana	Needs to improve

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 of the area median income.

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 (please 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	# of Bank Loans	Bank Loans \$(000s)	% of Bank Total	Overall Market	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	
Newton County	2	190	100.0	715	0.0	0.0	0.0	22.0	0.0	22.8	78.0	100	77.2	0.0	0.0	0.0	0.0	0.0	0.0	

Source: 2015 ACS; 2019,2020, and 2021 HMDA LAR data, 2021 HMDA aggregate data, 01/01/2019 – 12/31/2021 bank data.
 Note: Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	# of Bank Loans	Bank Loans \$(000s)	% of Bank Total	Overall Market	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	
Newton County	2	190	100.0	715	22.4	0.0	11.6	24.6	50.0	23.5	24.3	0.0	20.7	28.7	50.0	21.0	0.0	0.0	23.2	

Source: 2015 ACS; 2019,2020, and 2021 HMDA LAR data, 2021 HMDA aggregate data., 01/01/2019 – 12/31/2021 bank data.
 Note: Due to rounding, totals may not equal 100.0%