

PUBLIC DISCLOSURE

January 7, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Central FS & LA Charter Number 701567

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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: SATISFACTORY	3
DEFINITIONS AND COMMON ABBREVIATIONS	4
DESCRIPTION OF INSTITUTION	8
SCOPE OF THE EVALUATION	9
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	11
LENDING TEST	11
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

Overall CRA Rating: Satisfactory

The Lending Test is rated: <u>Satisfactory</u>.

The major factors supporting the rating for Central Federal Savings and Loan Association (CFSL) include:

- CFSL's loan-to-deposit ratio (LTD) is reasonable;
- CFSL originates a majority of their primary loan products within its AA;
- CSFL's record of lending reflects reasonable distribution to borrowers of different incomes; and
- The distribution of home mortgage loans originated or purchased by the bank in low- and moderate-income census tracts is reasonable.

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/assessment area.

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 the U.S. Department of Housing and Urban Development (HUD) Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the Office of the Comptroller of the Currency (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 CT delineated by the U.S. Census Bureau 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 metropolitan area/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. 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 (MSA): An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The MSA 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 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

Central Federal Savings and Loan Association (CFSL) is a nationally chartered intrastate financial institution headquartered in Cicero, Illinois (IL). The bank does not have a holding company nor any subsidiaries or affiliates. CFSL operates three branches in the Chicagoland area. The main branch is located in Cicero, IL with two other branches in Berwyn, and LaGrange Park, IL. All branches provide full banking services including automated teller machines (ATMs) and drive-up capabilities. The bank does not have any stand-alone ATM locations.

The bank's strategic focus is to meet the deposit and credit needs of its customers and the communities it serves. The bank offers home mortgages that are retained in its portfolio. CFSL is primarily active in providing fixed rate loans secured by one-to four-family dwellings and, to a lesser extent, loans secured by multifamily dwellings.

The bank has one assessment area (AA) which consists of 1,319 geographies encompassing all of Cook County, IL in the Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area (MSA).

As of September 30, 2018, CFSL reported total assets of \$177 million and a loan portfolio of \$111 million, or 62 percent of total assets. The loan portfolio consists of \$109 million (98 percent) in residential mortgages, \$2 million (1 percent) in commercial loans, and \$66,000 (less than 1 percent) in consumer and other loans. Total deposits as of September 30, 2018 were \$149 million and tier 1 capital totaled \$18 million.

As of the June 30, 2018 FDIC Market Share Report, CFSL had approximately 0.05 percent (\$148.3 million) market share of total FDIC insured deposits in the AA. CFSL ranked 78 out of the 113 total institutions in the AA, where a ranking of 113 equals the lowest market share. CFSL's major competitors consist of primarily of other community size financial institutions in the surrounding area, in addition to large national and regional competitors such as JP Morgan Chase, BMO Harris, Bank of America, and Fifth Third Bank.

There are no legal or financial impediments limiting CFSL's ability to help meet the credit needs of the local community, including those of low- and moderate-income families. The bank received a rating of Satisfactory at the last CRA evaluation, dated December 9, 2013.

Scope of the Evaluation

The Office of the Comptroller of the Currency evaluated CFSL's CRA performance under the Small Bank CRA examination procedures. This includes an evaluation of the bank's record of meeting the credit needs of its AA based on the following five criteria:

- LTD Ratio;
- Lending inside the AA;
- Lending to borrowers of different incomes;
- Geographic distribution of lending; and
- · Responsiveness to complaints.

Evaluation Period/Products Evaluated

For this performance evaluation, we used loan data from January 1, 2015 through December 31, 2017. The bank's primary loan type originated during the evaluation period was one-to four-family home mortgages. The bank originated and purchased 215 home mortgage loans totaling \$74 million during this period. This lending activity was the basis for our analysis. The bank did not originate any small business or small farm loans to be included in our sample.

We evaluated lending to borrowers of different incomes in addition to the geographic distribution of loans, as the AA is very large and includes all 1,319 census tracts in Cook County, IL and the MSA.

The evaluation of data was completed using two separate analysis periods due to demographic changes from the American Community Survey (ACS), which occurred in 2015. Loans originated in 2015 and 2016 were analyzed using 2010 census data and the bank's performance was compared to 2016 aggregate peer data. Loan data from 2017 was analyzed using 2015 ACS data, and we compared bank performance to 2016 aggregate peer data. Weight was split evenly among all three years, as activity was relatively consistent over the review period aside from a large purchase of loans occurring in 2016.

We generated a quarterly average of the bank's LTD ratio since the prior CRA evaluation. The average spanned twenty quarters from December 2013 through September 2018. More weight was given to the most recent nine quarters as the ratio has improved significantly in recent years.

The reported FDIC annual deposit market share information was used to determine the bank's market share and presence within its AA. The most recent deposit market share report was dated June 30, 2018.

We also considered the bank's responsiveness to community lending needs within the AA, and to any complaints received during the evaluation period.

Data Integrity

The bank is a HMDA reporter, and conducts a small review of loans each year prior to filing, but no formal reports were issued to rely on as part of our Data Integrity review. Thus, we selected a sample of home loans originated by the bank in years 2015, 2016, and 2017 to perform lending tests. We verified data in selected loan files to the data reported on the HMDA Loan Application Register (LAR) for each year.

Our review of loans from 2015 and 2016 determined the data to be reliable for use in this evaluation. The data from 2017 was determined to be unreliable given a significant level in reporting errors. The level of errors was due to a change in loan origination systems in May 2017. The bank performed their own review of 2017 data and corrected all errors prior to this evaluation. As such, the data used to arrive at our conclusions in this review is reliable and accurate.

Selection of Areas for Full-Scope Review

The bank only has one AA, which received a full-scope review.

Ratings

The bank's overall rating is based primarily on the AA that received the full-scope review.

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 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

CFSL's performance under the lending test is Satisfactory. The LTD ratio is reasonable and a majority of the loans were originated within the AA. Overall, distribution of credit within the assessment area is reasonable. Bank performance in lending to borrowers of different income levels reflects reasonable distribution. CFSL's complaint response process is appropriate.

LENDING TEST

Loan-to-Deposit Ratio

CFSL's quarterly average LTD ratio is reasonable based on its size, financial condition, and local credit needs and competition. The LTD ratio averaged 60 percent over the past 20 quarters, with significant improvement in the ratio over the last two years. We gave more weight to the LTD ratios from the last eight guarters as the bank had modified their lending strategy and the ratio has improved significantly over the last two years.

Over the past twenty quarters, the bank's highest LTD ratio was 74 percent and the lowest was 46 percent. The ratios of other banks in the AA ranged from 15 percent to 120 percent over the same review period.

Lending in Assessment Area

Table 1 - Lending Inside and Outside of the Assessment Area														
Nu	ımber (of Loa	ns	Total	Dollar	ns								
Insi	ide	Out	side		Insid	e	Outsio	Total						
# % # %				#	\$	%	\$	%	\$(000s)					
122	56.7%	93	43.3%	215	22,139	30%	51,630	70%	73,769					
122	56.7%	93	43.3%	215	22,139	30%	51,630	70%	73,769					
	# 122 122	Inside # % 122 56.7%	Inside Out # % # 122 56.7% 93 122 56.7% 93	# % # % 122 56.7% 93 43.3% 122 56.7% 93 43.3%	Inside Outside Total # % # % # 122 56.7% 93 43.3% 215 122 56.7% 93 43.3% 215	Number of Loans Inside Outside Total Inside # % # % # 122 56.7% 93 43.3% 215 22,139	Number of Loans \$(00	Number of Loans \$(000s)	Sign Sign					

Source: HMDA loans reported between 01/01/2015-12/31/2017

Due to rounding, totals may not equal 100.0

CFSL originated or purchased a majority of their primary product loans inside the AA. Our sample showed 57 percent of the total number of loans was originated or purchased within the AA.

Our conclusion is based on the total number of loans originated and purchased, however, the dollar volume of loans outside of the assessment area is significantly larger than the dollar volume of loans inside the assessment area. This is due to the bank's purchase of jumbo loans in 2016 and 2017 as part of the business strategy.

Lending to Borrowers of Different Incomes

Overall, the bank's record of lending reflects reasonable distribution to borrowers of different income levels.

For data discussed below, please refer to Table P in Appendix C.

Home Mortgage Lending 2015-2016

CFSL's performance in originating or purchasing one-to four-family mortgages during 2015 and 2016 was satisfactory.

Bank originations of home mortgage loans in 2015 and 2016 to low-income borrowers reflected reasonable penetration. The proportion of bank lending to low-income borrowers was above peer originations, but is below the percentage of low-income families within the AA. Borrowers in the low-income category have maximum incomes of \$38,100 and a median home value in the AA of \$291,818, almost eight times the annual income. As a result, homeownership for low-income individuals is difficult within the AA.

The bank's level of one-to four-family mortgage loan originations to moderate-income borrowers during the same timeframe was excellent. Lending to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was almost double the level of peer originations.

Home Mortgage Lending 2017

CFSL's performance in originating or purchasing one-to four-family mortgages during 2017 was consistent with performance for 2015-2016, showing reasonable penetration in the AA. The proportion of lending to low-income borrowers was in line with peer, but below the percentage of low-income families within the AA. In 2017, borrowers in the low-income category had maximum incomes of \$38,750 and a median home value in the AA of \$245,250, about six times the annual income, which indicates that homeownership for low-income individuals is difficult within the AA.

The bank's level of one-to four-family mortgage loan originations to moderate-income borrowers in 2017 was excellent. Lending to moderate-income borrowers exceeded the percentage of moderate-income borrowers in the AA and exceeded peer.

Geographic Distribution of Loans

For data discussed below, please refer to Table O in Appendix C.

CFSL's geographic distribution of home mortgage lending reflects reasonable distribution of loans to different income tracts throughout the AA. We compared the bank's lending in low- and moderate-income census tracts to aggregate HMDA loans in

those tracts as well as to percent of owner-occupied housing units in each income tract category. The bank did not make any loans to low-income tracts in 2015 and 2016; however, this is reasonable given lending in low-income tracts is limited due to economic constraints in the AA, and a large number of rental units available in the area. In 2017, the bank was in line with peer for loans made to low-income tracts, but still below the level of owner-occupied housing.

In contrast to poor dispersion in low-income tracts, the analysis shows excellent distribution to moderate-income tracts. Loans in moderate-income census tracts exceed the level of owner-occupied housing in the area and exceeded peer for all three years.

Responses to Complaints

The bank has not received any complaints regarding its CRA performance during the performance 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 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").

Time Period Reviewed	Lending Test (excludes CD	D loans): (1/1/15 to 12/31/17)						
Financial Institution		Products Reviewed						
Central FS & LA Cicero, IL		Residential Mortgage Loans						
Affiliate(s)	Affiliate Relationship	Products Reviewed						
N/A	N/A	N/A						
List of Assessment Areas and Ty	pe of Examination							
Assessment Area	Type of Exam	Other Information						
Cook County, IL Chicago-Naperville-Elgin, IL-IN-WI MSA Chicago-Naperville-Arlington Heights MD (#16974)	Full Scope	1,319 CTs encompassing all of Cook County						

Appendix B: Community Profiles for Full-Scope Areas

Demographic I	nformation o	of the Assessi	ment Area – 20	015 & 2016		
	Assessment A	Area: Cook (County, IL			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,318	17.7	27.5	29.6	25.0	0.3
Population by Geography	5,194,675	12.9	28.5	32.7	25.9	0.0
Housing Units by Geography	2,173,433	13.3	26.5	32.5	27.7	0.0
Owner-Occupied Units by Geography	1,169,991	6.0	22.4	37.9	33.7	0.0
Occupied Rental Units by Geography	766,490	20.6	31.7	27.2	20.6	0.0
Vacant Units by Geography	236,952	25.5	30.3	23.3	20.9	0.0
Businesses by Geography	274,455	6.4	18.6	31.0	43.7	0.2
Farms by Geography	2,915	5.1	18.9	35.9	40.1	0.0
Family Distribution by Income Level	1,203,421	26.8	17.8	18.7	36.7	0.0
Household Distribution by Income Level	1,936,481	28.4	16.5	17.7	37.4	0.0
Median Family Income MSA- 16974 Chicago-Naperville-Arlington Heights, IL MD		\$72,196	Median Housi	ng Value		\$291,818
	•		Median Gross	Rent		\$934
			Families Belov	w Poverty Le	vel	11.9%

Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0

^(*) The NA category consists of geographies that have not been assigned an income classification.

Demograph	ic Informat	ion of the As	sessment Area	ı - 2017		
A	Assessment A	Area: Cook (County, IL			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,319	19.3	28.8	24.2	26.7	1.0
Population by Geography	5,236,393	14.6	29.8	27.2	28.0	0.4
Housing Units by Geography	2,176,549	14.6	27.9	26.5	30.5	0.5
Owner-Occupied Units by Geography	1,107,485	7.0	24.1	32.3	36.4	0.2
Occupied Rental Units by Geography	835,474	21.0	32.1	21.0	25.0	0.9
Vacant Units by Geography	233,590	27.8	30.3	19.2	22.1	0.6
Businesses by Geography	282,658	7.0	20.4	26.6	45.3	0.8
Farms by Geography	3,054	5.8	21.8	31.9	40.4	0.1
Family Distribution by Income Level	1,184,857	28.0	17.0	17.7	37.2	0.0
Household Distribution by Income Level	1,942,959	29.2	15.8	16.7	38.2	0.0
Median Family Income MSA- 16974 Chicago-Naperville-Arlington Heights, IL MD		\$75,350	Median Housi	ng Value		\$245,250

	Median Gross Rent	\$1,038
	Families Below Poverty Level	13.2%
Source: 2015 ACS Census and 2017 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 cla	essification.	

CFSL has one assessment area (AA) where a majority of the institution's loans and deposits are generated. The AA includes 1,319 geographies within the Chicago-Naperville-Elgin, IL Metropolitan Statistical Area (MSA), which constitutes all of Cook County. The AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude low- or moderate-income geographies. CFSL's AA changed minimally from 1,318 to 1,319 geographies since the previous evaluation in 2013.

The bank operates three branches in the Chicagoland area. The main branch is located in Cicero, IL and the other two branches are located in Berwyn and La Grange Park, IL. Each branch location offers full banking services including drive-up services and ATMs. The bank does not have any stand-alone ATM locations.

The local economy has stabilized since the Great Recession, despite a slower-than-normal recovery. Current economic conditions continue to improve and unemployment levels remain low. Real estate sales and prices in the local area remain stable.

Examiners reached out to two community contacts during the course of the examination to gain perspective regarding the local area and economy immediately surrounding the bank. One community contact explained that the economy has stabilized but took longer to recover from the recession as the demographic of the town skews towards elderly and low-income families. This contact also stated that there has been an increase in the number of younger residents moving into the area over the last few years to take advantage of the economic opportunity available. As a result, housing prices have started to increase after years of decline and stagnation.

Both contacts indicated that CFSL is active in the community and in local charities to assist families in need. One contact noted that the number of banks in the area has decreased over the years, but the level of service provided by banks to the community remains high.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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 of each year. Tables without data are not included in this PE. 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.

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

2015-16

	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	00 0	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	
CFSL AA Cook County 2016	78	14,636	100.0	158,980	6.0	0.0	4.2	22.4	47.4	16.8	37.9	28.2	35.2	33.7	24.4	43.7	0.0	0.0	0.0	
Total	78	14,636	100.0	158,980	6.0	0.0	4.2	22.4	47.4	16.8	37.9	28.2	35.2	33.7	24.4	43.7	0.0	0.0	0.0	

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data,

Due to rounding, totals may not equal 100.0

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

2017

	Total Home Mortgage Loans			e Loans	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units		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		Aggregate	
CFSL	44	7,503	100.0	135,518	7.0	4.5	5.5	24.1	34.1	20.9	32.3	29.5	31.0	36.4	31.8	42.4	0.2	0.0	0.2	
AA Cook Co 2017																				
Total	44	7,503	100.0	135,518	7.0	4.5	5.5	24.1	34.1	20.9	32.3	29.5	31.0	36.4	31.8	42.4	0.2	0.0	0.2	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data,

Due to rounding, totals may not equal 100.0

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

2015-16

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-I1	ncome B	orrowers	Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
CFSL AA Cook Co 2016	78	14,636	100.0	158,980	26.8	9.0	5.1	17.8	20.5	13.3	18.7	24.4	19.4	36.7	30.8	47.5	0.0	15.4	14.8
Total	78	14,636	100.0	158,980	26.8	9.0	5.1	17.8	20.5	13.3	18.7	24.4	19.4	36.7	30.8	47.5	0.0	15.4	14.8

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data,

Due to rounding, totals may not equal 100.0

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

2017

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-In	ncome B	orrowers	Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
CFSL AA Cook Co 2017	44	7,503	100.0	135,518	28.0	4.5	5.5	17.0	27.3	15.9	17.7	20.5	20.3	37.2	38.6	42.5	0.0	9.1	15.8
Total	44	7,503	100.0	135,518	28.0	4.5	5.5	17.0	27.3	15.9	17.7	20.5	20.3	37.2	38.6	42.5	0.0	9.1	15.8

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data,

Due to rounding, totals may not equal 100.0