



PUBLIC DISCLOSURE

July 25, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

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

1 Home Loan Plaza, Suite 3, Warwick, RI 02886

Office of the Comptroller of the Currency

99 Summer Street, Suite 1400, Boston, MA 02110

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it 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.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The major factors supporting the institution's Community Reinvestment Act (CRA) rating are:

- Home Loan Investment Bank's level of lending, as reflected in its loan-to-deposit ratio, is more than reasonable.
- The distribution of loans reflects reasonable penetration among borrowers of different income levels.
- The geographic distribution of loans reflects reasonable dispersion in low- and moderate-income census tracts.
- Lending in the supplemental areas reflects reasonable penetration among borrowers of different income levels and reasonable dispersion in low- and moderate-income census tracts.

Scope of Examination

Home Loan Investment Bank ("Home Loan" or "the Bank") was evaluated using Small Bank examination procedures, which consists of a Lending Test. The Lending Test evaluates the Bank's record of meeting the credit needs of its assessment area (AA) through its lending activities. The evaluation period for the Lending Test covers the Bank's performance from January 1, 2014, through December 31, 2015, which is representative of the Bank's activities since the prior CRA evaluation.

The Bank's primary loan product, based on originations during the evaluation period, is residential mortgages, including home purchase, home refinance, and home improvement loans. Residential loans represent 41 percent of the Bank's originations by number and 85 percent by dollar volume during the evaluation period. During the evaluation period, Home Loan originated 385 home purchase loans, 126 home refinance loans, and 207 home improvement loans within its AA.

The Bank reports data under the requirements of the Home Mortgage Disclosure Act (HMDA). As part of our evaluation, we tested the Bank's HMDA data for residential real estate loans originated and purchased and found that the data was reliable. All residential mortgage loans originated during the evaluation period were included in our analysis of the Bank's lending. Our primary comparator was the aggregate performance of lenders in the area subject to HMDA reporting requirements.

A full scope review was performed on the AA, which includes the entire Providence-New Bedford-Fall River, MA-RI Metropolitan Statistical Area (MSA). The AA consists of the Rhode Island counties of Bristol, Kent, Newport, Providence, and Washington, and the Massachusetts county of Bristol. Although this is a multi-state MSA, the Bank is not given separate state ratings, as all of their branches are located in RI. Additionally,

consideration was given to two supplemental AAs, as Home Loan is a national lender of Federal Housing Association (FHA) Title I Home Improvement Loans.

Description of Institution

Home Loan is a privately held, federal stock savings bank wholly owned by Prospect Financial Corporation. As of March 31, 2016, the Bank had total assets of \$226 million and tier 1 capital of \$24 million. Home Loan offers a standard array of traditional loan and deposit products for consumer and business customers. The Bank focuses on residential and consumer loans. Management noted expansion in the automobile lending portfolio, but residential lending remains the primary loan product as evidenced by the concentration by dollar volume. The Bank offers other services including online banking, mobile banking, direct deposit, and wire transfer services. The Bank's website, www.homeloanbank.com, provides descriptions of available lending and deposit product offerings.

The Bank is a nationwide lender headquartered in Warwick, RI. In addition to the headquarters office in Warwick, Home Loan has one retail branch office located in Warwick and one in Providence. The Providence branch is located in a moderate-income tract. The two Warwick locations are located in middle-income tracts. Branch hours are typically 9:00 am to 5:00 pm, Monday through Friday, while the headquarters is open 8:30 am to 5:30 pm on weekdays. The Warwick branch is also open 9:00 am to 1:00 pm on Saturdays. No branches were open or closed during the evaluation period. Home Loan is part of the Allpoint automated teller machine (ATM) network, which provides free ATM withdrawals from over 55,000 Allpoint network ATMs for checking account customers.

As of March 31, 2016, the Bank's loan portfolio totaled \$193 million, or 85 percent of total assets. The following table provides a summary of the loan mix.

Loan Portfolio Summary by Loan Product March 31, 2016	
Loan Category	% of Gross Loans and Leases
1-4 Family Residential Mortgage – Closed End	63%
Consumer	21%
Commercial Real Estate	16%
Commercial & Industrial	<1%

Source: FDIC Call Report as of March 31, 2016.

The Bank has no financial or legal impediments to meeting the credit needs of the community. The Bank was rated "Satisfactory" using small bank procedures at the last CRA review dated April 18, 2011.

Description of Assessment Area

The CRA requires a bank to define the AA in which it will be evaluated. Home Loan has delineated one AA that includes all branches, as well as the contiguous towns/cities around these offices. The Bank's AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income tracts. The AA consists of the Rhode Island Counties of Bristol, Kent, Newport, Providence, and Washington, and the Massachusetts County of Bristol. These counties comprise the entire Providence-New Bedford-Fall River, MA-RI Metropolitan Statistical Area (MSA) #39300. The MSA contains 368 census tracts including 47 low-income tracts (13 percent), 77 moderate-income tracts (21 percent), 137 middle-income tracts (37 percent), and 104 high-income tracts (28 percent). There are three tracts (1 percent) whose populations are very small and therefore do not have any income information. None of the geographies are distressed or underserved.

The following table contains demographic information for the AA based on 2010 U.S. Census data:

Demographic Information for Home Loan Investment Bank's AA						
Income Level	Total #	% Low	% Moderate	% Middle	% Upper	%NA*
Geographies (Census Tracts)	368	13%	21%	37%	28%	1%
Population by Geography	1,600,852	10%	19%	39%	32%	0%
Owner-Occupied Housing by Geography	391,560	4%	13%	45%	38%	0%
Business by Geography	103,910	9%	16%	40%	35%	0%
Family Distribution by Income Level	400,698	23%	17%	20%	40%	0%
2010 Census Median Family Income (MFI)		\$70,496	Median Housing Value		\$301,214	
HUD Updated MFI: 2015		\$74,400	Households Below Poverty Level		13%	
			Providence County Unemployment Rate**		5.7%	

Source: 2010 U.S. Census and 2015 updated MFI

*The NA Category consists of geographies that have not been assigned an income classification

**Data from US Bureau of Labor Statistics as of May 2016

According to 2010 U.S. Census data, 40 percent of the families in the assessment area are classified as low-to-moderate income (LMI), with 13 percent of families reporting income below the poverty level. As of May 2016, the unemployment rate in Providence County was 5.7 percent. The local unemployment rate is above the national and state unemployment rates of 4.7 percent and 5.3 percent, respectively.

According to the Moody's economic indicators as of May 2016, the Providence-Warwick area remains in a recovery stage of the business cycle. The key economic drivers include the state capital, medical centers, and financial centers. The state of RI is spending more on education, which is an advantage for Providence as it houses several universities. Additionally, there is a tax-credit program that assists college graduates in repaying student loans if they stay in the state, which will slow the outflow of educated potential workers.

Home Loan operates in a highly competitive market. The Federal Deposit Insurance Corporation's (FDIC) Institutions Deposit Market Share Report as of June 30, 2015, indicates that 31 institutions operate in the Providence-Warwick RI-MA MSA, which comprises the Bank's AA. Home Loan ranks 20th, with a deposit market share of less than one percent. Citizens Bank N.A., Bank of America N.A., and Santander Bank N.A. are the top three ranked banks in deposit market share, with 63 percent of deposits. Local competitors include, but are not limited to, The Washington Trust Company of Westerly, Bank Rhode Island, Bristol County Savings Bank, Webster Bank, and BankNewport. Other larger nationwide institutions that provide further competition include The Bank of New York Mellon and TD Bank N.A.

Competition for residential loans, the Bank's primary product, is also high within the AA. The 2014 Peer Mortgage Data indicates that there are 442 lenders competing within Home Loan's AA. Home Loan ranks 34th, with less than one percent market share. The Bank competes with large and small local banks as well as other institutions such as mortgage brokerage firms, finance companies, and credit unions. Top lenders in the AA include Wells Fargo Bank N.A., Citizens Bank N.A., Quicken Loans, Navigant Credit Union, Bank of America N.A., Pawtucket Credit Union, and JP Morgan Chase Bank N.A.

During our evaluation, we contacted the Executive Director of a community organization in Providence to discuss the area's primary credit needs and identify opportunities for financial institutions to assist in the community. The organization has programs focused on affordable housing, economic development, income/wealth building programs, early childcare and learning facilities, and community safety. The contact discussed the need for affordable housing, given the current housing market and the state of the local economy. It was noted that funding is limited, particularly federal funding, as RI receives the state minimum given its size, so participation from financial institutions is important. The contact explained that while there are always opportunities for further involvement, local institutions are adequately involved in meeting the community's credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

The Bank's performance under the lending test is satisfactory. Home Loan's loan-to-deposit ratio is more than reasonable. The distribution of loans reflects reasonable penetration among individuals of different income levels. The geographic distribution of loans reflects reasonable dispersion in the low- and moderate-income census tracts.

The majority of loans are originated outside the Bank's AA, as the Bank participates in a national lending program for FHA Title I Home Improvement loans. Consequently, according to regulatory guidance, CRA credit will be considered for national loans to low- and/or moderate-income groups provided that the institution adequately addresses the needs of those borrowers within their AA. As Home Loan adequately addresses the needs of its AA, consideration was given to two supplemental AAs. These MSAs were identified as having among the highest number of FHA Title I Home Improvement loans originated nationwide. In the two supplemental AAs, the distribution of home improvement loans among borrowers of different income levels and the geographic distribution of loans in low- and moderate-income tracts are reasonable. Refer to the Conclusions With Respect to Performance Tests in Supplemental Areas section of this Performance Evaluation.

Loan-to-Deposit Ratio

Home Loan's net loan-to-deposit ratio is more than reasonable given the Bank's size, financial condition, and AA credit needs. The Bank's quarterly net loan-to-deposit ratio has averaged 92 percent over the last 19 quarters since the previous CRA review dated April 18, 2011. Over this period, the loan-to-deposit ratio ranged from a quarterly low of 80 percent to a high of 97 percent. Home Loan's loan-to-deposit ratio is consistently above the national peer group, which averaged 81 percent over the same period.

Lending in Assessment Area

A substantial majority of the Bank's home loans were originated outside of its assessment area. The Bank originated 22 percent by number and 42 percent by dollar amount of home loans inside the AA. The Bank does not meet the standard for satisfactory performance under this criteria; however, as previously noted, Home Loan is a national lender, which explains the low concentration of loans made within the AA. The lending assessment was expanded by a review of lending in supplemental areas outside the AA.

The following table details the Bank's lending within the AA by number and dollar amount of loans.

Table 1 – Lending in Home Loan’s AA (000s)										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	385	52%	349	48%	734	83,878	49%	87,657	51%	\$171,535
Home Refinance	126	42%	174	58%	300	29,533	41%	41,861	59%	\$71,394
Home Improvement	207	9%	2,072	91%	2,279	3,938	10%	35,323	90%	\$39,261
Total Home Loans	718	22%	2,595	78%	3,313	117,349	42%	164,842	58%	\$282,190

Source: HMDA-reported data from 1/1/2014-12/31/2015.

Lending to Borrowers of Different Incomes

The distribution of home loans originated in the Bank’s AA reflects reasonable penetration among borrowers of different income levels.

Home purchase loans represent a significant portion of overall originations made by the Bank during the Lending Test period. The percent of home purchase loans made to low-income borrowers is equal to the percent of peer aggregate lending data, which is our primary comparator, but is significantly below the percent of low-income families in the AA. The percent of home purchase loans made to moderate-income borrowers exceeds the aggregate lending data and significantly exceeds the percent of moderate-income families in the AA.

The percent of home refinance loans made to low-income borrowers is below the aggregate lending data and is significantly below the percent of low-income families in the AA. The percent of home refinance loans made to moderate-income families exceeds both the aggregate lending data and the percent of moderate-income families in the AA.

The Bank did not make home improvement loans to low-income borrowers during the evaluation period. The percent of home improvement loans made to moderate-income borrowers is below both the aggregate lending data and the percent of moderate-income families in the AA.

The Bank’s performance for home loans made to borrowers of different income levels within the AA is considered satisfactory, given the housing prices within the AA, the percentage of families living below the poverty level, and the level of market competition. The median housing price within the AA remains high relative to the U.S. Department of Housing and Urban Development (HUD) adjusted median family income. According to the 2010 U.S. Census Data, the average median home price in the AA is \$301 thousand. The 2015 HUD adjusted median family income is \$74,400, which means the maximum income that is considered low-income is \$37,200. Therefore, low-income borrowers would have difficulty qualifying for home loans in the AA.

The following tables show the Bank's distribution of home loan products among borrowers of different income levels as compared to aggregate lending data and the percent of families in each income category.

Table 2A – Borrower Distribution of Residential Real Estate Loans in the AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans
Home Purchase	7%	7%	24%	29%	28%	32%	41%	32%
Home Improvement	8%	0%	19%	12%	27%	36%	46%	52%
Home Refinance	8%	3%	18%	21%	27%	21%	47%	55%

Source: HMDA-reported data from 1/1/2014-12/31/2015.

Table 2B – Borrower Distribution of Residential Real Estate Loans in the AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Loans	% of AA Families	% of Loans	% of AA Families	% of Loans	% of AA Families	% of Loans
Home Purchase	23%	7%	17%	29%	20%	32%	40%	32%
Home Improvement	23%	0%	17%	12%	20%	36%	40%	52%
Home Refinance	23%	3%	17%	21%	20%	21%	40%	55%

Source: HMDA-reported data from 1/1/2014-12/31/2015.

Geographic Distribution of Loans

The geographic distribution of home loans originated in the Bank's AA reflects reasonable dispersion in low- and moderate-income census tracts. We found no conspicuous gaps or areas of low penetration in the Bank's lending patterns.

The percent of home purchase loans made in low-income geographies is near to both the aggregate lending data and the percent of owner-occupied units in the AA. The percent of home purchase loans made in moderate-income geographies is below both the aggregate lending data and the percent of owner-occupied units in the AA.

The percent of home refinance loans made in low-income geographies is near to both the aggregate lending data and the percent of owner-occupied units in the AA. The percent of home refinance loans made in moderate-income geographies is below both the aggregate lending data and the percent of owner-occupied units in the AA.

The percent of home improvement loans made in low-income geographies is near to both the aggregate lending data and the percent of owner-occupied units in the AA. The percent of home improvement loans made in moderate-income geographies exceeds both the aggregate lending data and the percent of moderate-income families in the AA.

The Bank’s geographic distribution of loans is considered satisfactory, given the high cost of housing and the strong market competition for home loans. According to 2014 Mortgage Market Share data, 442 lenders compete in the Bank’s AA. Mortgage lending in the AA is dominated by larger institutions, with the top ten institutions holding 32 percent of the market share. Additionally, the percent of owner-occupied housing in the low-income geographies is low at 4 percent, limiting the opportunities for home ownership in these areas.

The following tables show the Bank’s distribution of home loan products among census tract income levels as compared to aggregate lending data and the percent of owner-occupied housing units for each income category.

Table 3A – Geographic Distribution of Residential Real Estate Loans in the AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans
Home Purchase	4%	2%	13%	10%	44%	52%	39%	36%
Home Improvement	4%	2%	12%	15%	44%	50%	40%	33%
Home Refinance	4%	2%	12%	8%	43%	40%	41%	50%

Source: HMDA-reported data from 1/1/2014-12/31/2015.

Table 3B – Geographic Distribution of Residential Real Estate Loans in the AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of Owner Occupied	% of Loans	% of Owner Occupied	% of Loans	% of Owner Occupied	% of Loans	% of Owner Occupied	% of Loans
Home Purchase	4%	2%	13%	10%	45%	52%	38%	36%
Home Improvement	4%	2%	13%	15%	45%	50%	38%	33%
Home Refinance	4%	2%	13%	8%	45%	40%	38%	50%

Source: HMDA-reported data from 1/1/2014-12/31/2015.

Response to Complaints

The Bank did not receive any complaints during the evaluation period related to its performance helping to meet the credit needs within the AA.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 CFR 195.28(c), in determining a federal savings association's (FSA) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the FSA, or in any assessment area by an affiliate whose loans have been considered as part of the FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SUPPLEMENTAL AREAS

Because the Bank is a national lender, we conducted an analysis to capture Home Loan's performance outside their AA; two supplemental AAs were selected. The two supplemental AAs are the MSAs that had the highest number of FHA Title I Home Improvement loans originated by the Bank nationwide. We assessed the distribution of home improvement loans among borrowers of different income levels and the geographic distribution of home loans in the low- and moderate-income census tracts in these AAs.

In the supplemental areas, the distribution of home improvement loans among borrowers of different income levels and geographic distribution of home improvement loans in both low- and moderate-income tracts is reasonable.

Peer Mortgage 2014 Market Share data shows that Home Loan ranked fourth in the nation by count, making 1,049 FHA Title I Home Improvement loans. Nationwide, Home Loan ranked third in making home improvement loans available to low- and moderate-income borrowers. The Bank ranked fourth in making these loans in low- and moderate-income census tracts. This performance provides further support, showing that distribution of home improvement loans among borrowers of different income levels and within low- and moderate-income census tracts outside the Bank's AA is reasonable.

The following table details the two supplemental areas and the number of loans made.

Supplemental Areas – FHA Title I Home Improvement Loans	
MSA	# of Loans
New York-Newark-Jersey City, New York-New Jersey-Pennsylvania MSA	119
Chicago-Naperville-Elgin, Illinois-Indiana-Wisconsin MSA	130

Source: HMDA reported data from 1/1/2014-12/31/2015; 2010 U.S. Census data.

New York-Newark-Jersey City, New York-New Jersey-Pennsylvania MSA

The distribution of loans among borrowers of different income levels and the geographic distribution of loans in low- and moderate-income census tracts is reasonable.

Lending to Borrowers of Different Incomes

The distribution of home improvement loans in the NY-NJ-PA supplemental AA reflects reasonable penetration among borrowers of different income levels. The percent of home improvement loans made to low-income borrowers is below the percent of aggregate lending data, our primary comparator, and is also significantly below the percent of low-income families in the AA. The percent of home improvement loans made to moderate-income borrowers exceeds the percent of aggregate lending data and is near to the percent of moderate-income families in the AA.

The first table below shows the Bank’s distribution of home improvement loans in this supplemental AA among borrowers of different income levels as compared to aggregate lending data for HMDA reporters within this AA. The second table compares the Bank’s distribution to the percent of families in each income category.

Aggregate Lending Data for Borrower Distribution in the NY-NJ-PA MSA Supplemental AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans
Home Improvement	7%	1%	13%	14%	21%	23%	59%	62%

Source: HMDA reported data from 1/1/2014-12/31/2015; 2010 U.S. Census data.

Borrower Distribution of Residential Real Estate Loans in the NY-NJ-PA MSA Supplemental AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Families	% of Loans	% of Families	% of Loans	% of Families	% of Loans	% of Families	% of Loans
Home Improvement	24%	1%	16%	14%	18%	23%	42%	62%

Source: HMDA reported data from 1/1/2014-12/31/2015; 2010 U.S. Census data.

Geographic Distribution of Loans

The geographic distribution of home improvement loans originated in this AA represents reasonable dispersion in low- and moderate-income census tracts. The percent of home improvement loans originated in the NY-NJ-PA supplemental AA exceeds the percent of aggregate lending data for both low- and moderate-income geographies. Additionally, the percent of home improvement loans made for both low- and moderate-income geographies exceeds the percent of owner occupied housing in both low- and moderate-income geographies.

The following tables detail the aggregate lending data for all HMDA reporters within this AA, as well as the Bank’s performance compared to the percent of owner occupied housing units in each census tract income level.

Aggregate Lending Data for Geographic Distribution in the NY-NJ-PA MSA Supplemental AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans
Home Improvement	2%	4%	12%	15%	33%	37%	53%	44%

Source: HMDA reported data from 1/1/2014-12/31/2015; 2010 U.S. Census data

Geographic Distribution of Residential Real Estate Loans in the NY-NJ-PA MSA Supplemental AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Owner Occupied	% of Loans	% of Owner Occupied	% of Loans	% of Owner Occupied	% of Loans	% of Owner Occupied	% of Loans
Home Improvement	2%	4%	14%	15%	36%	37%	48%	44%

Source: HMDA reported data from 1/1/2014-12/31/2015; 2010 U.S. Census data

Chicago-Naperville-Elgin, Illinois-Indiana-Wisconsin MSA

The distribution of loans among borrowers of different income levels and the geographic distribution of loans in low- and moderate-income tracts is reasonable.

Lending to Borrowers of Different Incomes

The distribution of home improvement loans in the IL-IN-WI supplemental AA reflects reasonable penetration among borrowers of different income levels. The percent of home improvement loans made to low-income borrowers is significantly below both the aggregate lending data, the primary comparator, and the percent of low-income families in the AA. The percent of home improvement loans made to moderate-income borrowers exceeds both the aggregate lending data and the percent of moderate-income families in the AA.

The first table below shows the Bank’s distribution of home improvement loans in this supplemental AA among borrowers of different income levels as compared to aggregate lending data for HMDA reporters within this AA. The second table compares the Bank’s distribution to the percent of families in each income category.

Aggregate Lending Data for Borrower Distribution in the IL-IN-WI MSA Supplemental AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans
Home Improvement	11%	2%	18%	19%	24%	33%	47%	46%

Source: HMDA reported data from 1/1/2014-12/31/2015; 2010 U.S. Census data.

Borrower Distribution of Residential Real Estate Loans in the IL-IN-WI MSA Supplemental AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Families	% of Loans	% of Families	% of Loans	% of Families	% of Loans	% of Families	% of Loans
Home Improvement	22%	2%	17%	19%	20%	33%	41%	46%

Source: HMDA reported data from 1/1/2014-12/31/2015; 2010 U.S. Census data.

Geographic Distribution of Loans

The geographic distribution of home improvement loans originated in the IL-IN-WI supplemental AA represents reasonable dispersion in low- and moderate-income census tracts. The percent of home improvement loans originated in low-income geographies exceeds both the percent of aggregate lending data and the percent of owner occupied housing in low-income geographies. The percent of home improvement loans made in moderate-income geographies significantly exceeds both the percent of aggregate lending data and the percent of owner occupied housing in moderate-income geographies.

The following tables detail the aggregate lending data for all HMDA reporters within this AA as well as the Bank’s performance compared to the percent of owner occupied housing units in each census tract income level.

Aggregate Lending Data for Geographic Distribution in the IL-IN-WI MSA Supplemental AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans	% of Aggregate	% of Loans
Home Improvement	4%	6%	16%	22%	41%	46%	39%	26%

Source: HMDA reported data from 1/1/2014-12/31/2015; 2010 U.S. Census data.

Geographic Distribution of Residential Real Estate Loans in the IL-IN-WI MSA Supplemental AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Owner Occupied	% of Loans	% of Owner Occupied	% of Loans	% of Owner Occupied	% of Loans	% of Owner Occupied	% of Loans
Home Improvement	4%	6%	17%	22%	40%	46%	39%	26%

Source: HMDA reported data from 1/1/2014-12/31/2015; 2010 U.S. Census data.