

# **PUBLIC DISCLOSURE**

August 5, 2019

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Interstate Federal Savings and Loan Association of McGregor Charter Number 703560

154 Main St. McGregor, IA 52157

Office of the Comptroller of the Currency

Omaha Field Office 13710 FNB Parkway Suite 110 Omaha, NE 68154

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 Outstanding.

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on the bank's one assessment area (AA).
- The loan to deposit (LTD) ratio is more than reasonable when considering the bank's size, financial condition, and the credit needs of its AA.
- Management originates a substantial majority of its loans by number and dollar to customers located inside the bank's AA.
- The income distribution of borrowers of different income tracts reflects excellent penetration compared to AA demographics.
- The geographic distribution of borrowers from different census tracts reflects excellent dispersion compared to census tract income levels.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable.

The bank's LTD ratio averaged 104.20 percent over the last 20 quarters with a low of 92.56 percent and a high of 117.97 percent. The bank's LTD ratio was compared to four banks that operated in the same area as Interstate Federal Savings and Loan Association of McGregor (Interstate). The four banks are significantly bigger than Interstate because there are no banks of a comparable size that operated in the AA. The peer banks' average LTD was 89.44 percent and ranged from 86.54 percent to 93.24 percent.

### **Lending in Assessment Area**

A substantial majority of the bank's loans are inside its AA.

The bank originated and purchased 85 percent of its total loans inside the bank's AAs during the evaluation period.

Lending Inside and	Outside of tl	ie Asses	sment Are	a		Lending Inside and Outside of the Assessment Area														
		Number	of Loans			Dollar .	000s)													
Loan Category	Ins	ide	Outs	ide	Total	Insid	e	Outsi	Total											
	#	%	#	%	#	\$ %		\$	%	\$(000s)										
Home Mortgage	17	85%	3	15%	20	\$795,011	72%	\$304,625	28%	\$1,099,636										
Total	17	85%	3	15%	20	\$795,011	72%	\$304,625	28%	\$1,099,636										

### **Description of Institution**

Interstate is a single branch institution in McGregor, Iowa. As of June 30, 2019, the bank had \$7.9 million in total assets. The bank has one AA. The bank's loan and deposit products are primarily 1-4 family residential mortgages and certificates of deposit. As of June 30, 2018, the FDIC deposit market share report shows that the bank ranks last in market share with \$6 million in local deposits. The bank has no non-local deposits.

The bank has no legal or financial impediments preventing it from meeting the credit needs of its community. The bank was rated "outstanding" at the last CRA examination dated April 8, 2014.

### **Scope of the Evaluation**

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

The bank's compliance with CRA was evaluated from January 1, 2016 to December 31, 2018. The primary product evaluated was 1-4 family residential real estate mortgages. One-to-four family residential real estate mortgages account for 85 percent of loans originated by the bank.

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

The bank has one AA. A full-scope review was performed for this AA.

#### **Ratings**

The overall rating is based on the bank's one AA, which consists of portions of Allamakee and Clayton counties in Iowa.

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

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

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

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

### **State Rating**

### State of Iowa

**CRA** rating for the State of Iowa: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The LTD ratio is more than reasonable when considering the bank's size, financial condition, and the credit needs of its AA.
- Management originates a substantial majority of its loans by number and dollar to customers located inside the bank's AA.
- The income distribution of borrowers of different income tracts reflects excellent penetration compared to AA demographics.
- The geographic distribution of borrowers from different census tracts reflects excellent dispersion compared to census tract income levels.

### **Description of Institution's Operations in Iowa**

Interstate is a single branch institution in McGregor, Iowa. As of June 30, 2019, the bank had \$7.9 million in total assets. The bank has one AA. The bank's loan and deposit products are primarily 1-4 family residential mortgages and certificates of deposit respectively. As of June 30, 2018, the FDIC deposit market share report shows that the bank ranks last in market share with \$6 million in local deposits. The bank has no non-local deposits.

A representative from the City of McGregor was contacted by phone to discuss needs of the local economy. The representative stated that the city is a small town with 871 people and categorized the income class of the city to be low-to-moderate. The representative believes that the needs of the community include more housing as much of the existing housing is pre-1950s. The representative stated that the community needs more senior housing and apartments as well as more downtown housing. Empty second floor space downtown is available that could be used for apartments or housing. The representative stated that the local banks have invested in the community "quite a bit", and that local banks are willing to further invest in the community. The representative stated that opportunities for banks to invest in the community include downtown development and financing small subdivisions.

# Allamakee-Clayton 2016

Table A – Der	Table A – Demographic Information of the Assessment Area														
Assessment Area: 2016 Allamakee-Clayton															
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #									
Geographies (Census Tracts)	7	0.0	0.0	100.0	0.0	0.0									
Population by Geography	22,111	0.0	0.0	100.0	0.0	0.0									
Housing Units by Geography	11,580	0.0	0.0	100.0	0.0	0.0									

Owner-Occupied Units by Geography	7,253	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	2,314	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	2,013	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,814	0.0	0.0	100.0	0.0	0.0
Farms by Geography	444	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	6,216	16.6	18.1	28.2	37.0	0.0
Household Distribution by Income Level	9,567	19.9	18.1	20.4	41.6	0.0
Median Family Income Non-MSAs - IA		\$56,190	Median Hous	ing Value		\$99,645
			Median Gross	Rent		\$476
			Families Belo	w Poverty Le	vel	7.5%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

# Allamakee-Clayton 2017-2018

Table A – Den	nographic I	nformation	of the Assessn	nent Area		
Assessi	nent Area:	2017-18 All	amakee-Clayt	on		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	14.3	85.7	0.0	0.0
Population by Geography	21,702	0.0	14.4	85.6	0.0	0.0
Housing Units by Geography	11,568	0.0	11.5	88.5	0.0	0.0
Owner-Occupied Units by Geography	7,326	0.0	10.7	89.3	0.0	0.0
Occupied Rental Units by Geography	2,164	0.0	19.0	81.0	0.0	0.0
Vacant Units by Geography	2,078	0.0	6.2	93.8	0.0	0.0
Businesses by Geography	1,769	0.0	12.4	87.6	0.0	0.0
Farms by Geography	384	0.0	12.0	88.0	0.0	0.0
Family Distribution by Income Level	6,064	20.3	21.2	22.5	36.0	0.0
Household Distribution by Income Level	9,490	23.4	20.3	18.6	37.7	0.0
Median Family Income Non-MSAs - IA		\$61,934	Median Housi	ng Value		\$111,208
			Median Gross	Rent		\$577
			Families Belo	w Poverty Le	vel	7.5%

Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

### **Scope of Evaluation in Iowa**

The bank has one AA that is in the southern half of Allamakee County and the northern half of Clayton County in Iowa. The AA includes the geographies where the bank has its only office. This AA received a full-scope review.

#### LENDING TEST

The bank's performance under the Lending Test in Iowa is rated Outstanding.

Based on the full-scope review, the bank's lending performance in the state of Iowa is excellent.

Loan data collected from the bank showed that the bank's primary product was 1-4 family residential real estate loans which accounted for 85 percent of total loans by number and 82 percent of total loans by dollar. The bank originated a minimal number of small business, small farm, and consumer loans and an analysis of those product types is not meaningful.

### Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans.

#### Home Mortgage Loans

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

During the assessment period, 100 percent of 1-4 family residential loans sampled were made to middle income tracts. One census tract in the AA became moderate income in 2017. The bank did not originate any loans to this census tract during the assessment period from 2016 to 2018. This includes the year before the tract became a middle-income tract. The census tract is primarily agricultural land and includes the northern part of Postville. The bank does not originate many agricultural loans and historically the bank has had very little loan activity in Postville. Additionally, this census tract is geographically far from the bank.

### Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

### Home Mortgage Loans

Refer to Table P in the state of Iowa section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. The distribution of 1-4 family residential loans to borrowers of different income levels is strong and reflects excellent penetrations of the AA demographics. The percentage by number of loan originations is higher than census data for both 2016 and combined 2017 and 2018. Less weight is given to the percentage of loans by dollar value because lower income borrowers often originate smaller dollar value loans.

In 2016, 58 percent of loans by number and 59 percent of loans by dollar were originated to low- and moderate-income borrowers. This compares to 36 percent of families in the AA being low-to-moderate income.

In 2017 and 2018, 55 percent of loans by number and 32 percent of loans by dollar were originated to low- and moderate-income borrowers. This compares to 41 percent of families in the AA being low to moderate income.

### **Responses to Complaints**

There were no complaints relating to the bank's CRA performance during the assessment 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 statistical areas (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:	01/01/16 to 12/31/18	
Bank Products Reviewed:	Home mortgage loans	
List of Assessment Areas and Typ	e of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
Iowa		
Allamakee-Clayton	Full-scope	Portions of Allamakee and Clayton counties

# **Appendix B: Summary of State Ratings**

RATINGS	Interstate FS&LA of McGregor
Overall Bank:	Lending Test Rating
Interstate FS&LA of McGregor	Outstanding
State:	
Iowa	Outstanding

# **Appendix C: Definitions and Common Abbreviations**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

# **Appendix D: Tables of Performance Data**

### **Content of Standardized Tables**

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 AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this performance evaluation.

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 AA. The table also presents aggregate peer data for the years the data is available.

Table O:	Assessment Area	Distribution of H	ome Mortgage	Loans by	<b>Income Category</b>	of the Geography
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2016

	Total Home Mortgage Loans Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts						
Assessment Area:	#	\$		Overall Market			Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate
2016 Allama kee- Clayton	19	1,238,530	100.0	460	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0%	0.0	0.0	0%	0.0
Total	19	1,238,530	100.0	460	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0%	0.0	0.0	0%	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

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

2017-18

	Total Home Mortgage Loans Low-Income Tracts			Tracts	Moderate-Income Tracts			Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts					
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate			Aggregate
2017-18 All amakee- Clay ton	20	1,262,723	100.0	405	0.0	0.0	0.0	10.7	0.0	10.9	89.3	100.0	89.1	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	1,262,723	100.0	405	0.0	0.0	0.0	10.7	0.0	10.9	89.3	100.0	89.1	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table P:	Assessment Area	Distribution of	of Home	Mortgage l	Loans by	Income (	Category (	of the Borrower
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2016

	Total Home Mortgage Loans			Loans	Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-I	ncome l	Borrowers	Not Available-Income Borrowers		
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2016 Allamake e-Clayton		1,238,530	100.0	460	16.6	11.0	10.2	18.1	47.0	20.2	28.3	16.0	20.9	37.1	26.3	39.6	0.0	0.0	9.1
Total	19	1,238,530	100.0	460	16.6	10.5	10.2	18.1	47.4	20.2	28.3	15.8	20.9	37.1	26.3	39.6	0.0	0.0	9.1

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

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

2017-18

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2017-18 Allam akee- Clayton	20	1,262,723	100.0	405	20.3	10.0	8.6	21.2	45.0	21.5	22.5	10.0	26.2	36.0	35.0	33.8	0.0	0.0	9.9
Total	20	1,262,723	100.0	405	20.3	10.0	8.6	21.2	45.0	21.5	22.5	10.0	26.2	36.0	35.0	33.8	0.0	0.0	9.9

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Due to rounding, totals may not equal 100.0