

# **PUBLIC DISCLOSURE**

March 14, 2016

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Main Street Bank  
RSSD# 3351440

31780 Telegraph Road  
Bingham Farms, Michigan 48025

Federal Reserve Bank of Chicago

230 South LaSalle Street  
Chicago, Illinois 60604-1413

**NOTE:** This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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## BANK'S CRA RATING

Main Street Bank is rated Satisfactory.

Main Street Bank provides credit consistent with its size, location, and the local economic conditions within the assessment area. The loan-to-deposit ratio is more than reasonable. The majority of home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small business loans are in the assessment area. The geographic distribution of loans reflects reasonable dispersion throughout the assessment area, and the bank displays reasonable distribution among individuals of different income levels, including low-and moderate-income, and businesses of different sizes. There were no CRA-related complaints received by the institution or by this Reserve Bank regarding the institution's CRA performance.

## SCOPE OF EXAMINATION

Main Street Bank's performance was evaluated using the Federal Financial Institutions Examination Council's Small Institution CRA Examination Procedures. The CRA performance evaluation assesses the bank's responsiveness and effectiveness in meeting the credit and community development needs of its assessment areas. Performance was evaluated within the context of information about asset size, financial condition, and competitive factors as well as consideration of the economic and demographic characteristics of bank's assessment areas. Lending activity for HMDA-reportable loans and loans to small business was analyzed for Macomb and Oakland Counties in Michigan, both part of the Warren-Troy-Farmington Hills, Michigan Metropolitan Division (MD) #47664. Performance in the assessment area was evaluated using the streamlined assessment method for small banks based on the following performance criteria:

- ***Loan-to-Deposit Ratio*** – A 16-quarter average loan-to-deposit ratio was calculated beginning December 31, 2011 and ending September 30, 2015 for the bank and compared to a sample of local competitors.
- ***Lending in the Assessment Area*** – The bank's Home Mortgage Disclosure Act (HMDA)-reportable loans originated from January 1, 2012 to December 31, 2014 and small business loans originated from July 1, 2014 to December 31, 2014 were reviewed to determine the percentage of loans originated in the assessment area.
- ***Geographic Distribution of Lending in the Assessment Area*** – The bank's HMDA-reportable loans originated in the assessment area from January 1, 2012 to December 31, 2014 were analyzed to determine the extent to which the bank is making loans in geographies of different income levels, particularly those designated as low-and moderate-income. Loans to small

businesses from July 1, 2014 to December 31, 2014 were analyzed to determine the extent to which the bank is making loans in geographies of different income levels, particularly those designated as low- or moderate income.

- *Lending to Borrowers of Different Incomes and to Businesses of Different Sizes* – The bank’s HMDA-reportable loans originated in the assessment area, from January 1, 2012 to December 31, 2014, were reviewed to determine the distribution among borrowers of different income levels. Loans to small businesses originated in the assessment area from July 1, 2014 to December 31, 2014 were reviewed to determine the distribution among businesses with different revenue sizes.
- *Response to Substantiated Complaints* – Neither Main Street Bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

## DESCRIPTION OF INSTITUTION

Main Street Bank is a subsidiary of North Star Financial Holdings, a one-bank holding company located in Bingham Farms, Michigan. As of September 30, 2015, the bank had total assets of \$196.2 million. The bank’s main office is located in Bingham Farms, Michigan (Oakland County), and there is a full service branch facility in Troy, Michigan (Oakland County) that was opened in October of 2013 and includes a full-service automated teller machine (ATM). In addition, the bank has loan production offices (LPO) located in Rochester (Oakland County), Clinton Township (Macomb County), and Northville (Wayne County), Michigan. The Clinton Township office also contains a cash-only ATM.

The bank offers standard deposit and credit products to meet the banking needs of consumers and businesses operating in the assessment area. Deposit products include regular checking, non-profit checking, business checking, premium business account checking, savings, money market, certificate of deposits, Keough accounts, and individual retirement accounts. The bank recently added the Kasasa checking and savings offerings to its product lines. Credit products include secured and unsecured consumer loans and lines of credit; home purchase, refinance, home improvement loans including the Urban Home Rehabilitation Program, home equity loans, lines of credit, construction loans, and bridge loans. In addition, the bank provides mortgages through the Michigan State Housing Development Authority (MSHDA), Federal Housing Administration (FHA), Veterans Administration Loans (VA), and portfolio adjustable rate mortgages. Commercial loans include secured and unsecured lines of credit for working capital, machinery and equipment loans, acquisition loans, letters of credit, SBA loans, owner-occupied and investment property construction permanent financing. The bank offers full banking services through the main office and bank branch, as well as loan origination services through its loan production offices. The bank



also offers 24-hour automated telephone banking services, maintains internet social media presence, and provides information on loan and deposit products and access to online banking through its webpage.

As reflected in the following table, commercial lending by dollar comprises the majority (65.6 percent) of the bank's outstanding loans. The commercial numbers include non-farm, non-residential real estate secured and commercial loans. Residential real estate experienced a significant increase in activity, now representing 34.0 percent of the bank's overall loan portfolio, in comparison to the 19.7 percent exhibited during the review period for the previous performance evaluation.

Loan Portfolio Composition as of Sept 30, 2015		
Loan Type	Dollar Volume (\$ in 000s)	% of Portfolio
Commercial	115,509	65.5
Residential Real Estate	60,077	34.0
Consumer	879	0.5
<b>Total</b>	<b>176,465</b>	<b>100.0</b>
<i>Note: Percentages may not add to 100.0 percent due to rounding.</i>		
<i>Consolidated Reports of Condition and Income, September 30, 2015</i>		

There are no known legal, financial or other factors impeding the bank's ability to help meet the credit needs in its communities.

The bank was rated Satisfactory under the CRA at its previous evaluation conducted on November 28, 2011.

## DESCRIPTION OF ASSESSMENT AREA

Main Street Bank delineated Macomb and Oakland Counties in their entirety, as its assessment area. Both counties are located in the Warren-Troy-Farmington Hills, Michigan Metropolitan Division (MD) #47664, which also includes the counties of Lapeer, Livingston, and St. Clair. The MD number was changed by the Office of Management and Budget in February 2013 from #47644 to #47664; however there were no changes in the counties that comprised the MD. The Warren-Troy-Farmington Hills MD is part of the Detroit-Warren-Dearborn, Michigan Metropolitan Statistical Area (MSA) #19820. In addition to the Warren-Troy-Farmington Hills MD, the Detroit-Warren-Dearborn MSA includes the Detroit-Livonia-Dearborn, Michigan MD #19804 which is comprised of Wayne County in its entirety.

The current performance evaluation includes the bank's submitted delineated assessment area of Macomb and Oakland counties. The previous evaluation dated November 28, 2011 had also included Wayne County due to significant loan originations during the calendar year of 2010.

The two-county assessment area is composed of 555 census tracts; Oakland County contains the largest number of census tracts with 338 (or 60.9 percent) while Macomb County has 217 (or 39.1 percent). Of the 555 census tracts, 5.6 percent are designated as low-income, and 20.9 percent are designated as moderate-income. The bank's main office, sole deposit-taking branch facility, and one loan production office are located in Macomb County. The remaining two loan production offices are located in Oakland and Wayne Counties. No branch or loan production offices are located in either a low- or moderate-income census tract.

The Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report dated June 30, 2015, ranks Main Street Bank 19<sup>th</sup> out of 36 FDIC-insured institutions operating in the assessment area. The bank has a 0.3 percent market share, compared to the market leader Bank of America N.A. which has 17.1 percent of the assessment area's FDIC-insured deposits. The bank ranked 18<sup>th</sup> out of 501 HMDA-reporters in loan originations and purchases in its assessment area, based on 2014 aggregate lending data.

Select demographics of the assessment area in 2014 are presented in the following table. Demographics of the assessment area in 2012 and 2013 are available in the appendix.

Assessment Area: 2014 Warren-Troy-Farmington Hills, MI 47664 MD								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	31	5.6	21,297	3.9	5,892	27.7	108,178	20.0
Moderate-income	116	20.9	101,539	18.8	12,480	12.3	96,429	17.9
Middle-income	239	43.1	239,084	44.3	13,250	5.5	113,025	20.9
Upper-income	163	29.4	177,772	32.9	4,242	2.4	222,088	41.1
Unknown-income	6	1.1	28	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>555</b>	<b>100.0</b>	<b>539,720</b>	<b>100.0</b>	<b>35,864</b>	<b>6.6</b>	<b>539,720</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	47,275	16,933	2.7	35.8	22,495	47.6	7,847	16.6
Moderate-income	191,627	113,875	18.4	59.4	59,348	31.0	18,404	9.6
Middle-income	394,344	283,214	45.7	71.8	82,053	20.8	29,077	7.4
Upper-income	248,571	205,884	33.2	82.8	27,520	11.1	15,167	6.1
Unknown-income	403	9	0.0	2.2	31	7.7	363	90.1
<b>Total Assessment Area</b>	<b>882,220</b>	<b>619,915</b>	<b>100.0</b>	<b>70.3</b>	<b>191,447</b>	<b>21.7</b>	<b>70,858</b>	<b>8.0</b>
	Total Businesses Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	4,646	4.2	3,736	3.8	719	7.7	191	5.7
Moderate-income	20,486	18.5	17,479	17.8	2,384	25.7	623	18.5
Middle-income	44,443	40.1	39,821	40.6	3,242	34.9	1,380	41.0
Upper-income	40,815	36.8	36,878	37.6	2,781	29.9	1,156	34.4
Unknown-income	438	0.4	257	0.3	166	1.8	15	0.4
<b>Total Assessment Area</b>	<b>110,828</b>	<b>100.0</b>	<b>98,171</b>	<b>100.0</b>	<b>9,292</b>	<b>100.0</b>	<b>3,365</b>	<b>100.0</b>
	Percentage of Total Businesses:			88.6		8.4		3.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	3	0.5	3	0.5	0	0.0	0	0.0
Moderate-income	60	10.6	59	10.7	1	8.3	0	0.0
Middle-income	284	50.4	281	51.0	3	25.0	0	0.0
Upper-income	217	38.5	208	37.7	8	66.7	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>564</b>	<b>100.0</b>	<b>551</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
	Percentage of Total Farms:			97.7		2.1		0.2

2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS

Note: Percentages may not add to 100.0 percent due to rounding

## Population Characteristics

According to the 2010 U.S. Census Bureau, both counties within the assessment area experienced an increase in population from 2000 to 2010. The assessment area experienced an increase in population of 3.1 percent, comparable to the Warren-Troy-Farmington Hills MD which had an overall increase of 3.5 percent in population during the same period. In comparison, the state of Michigan, as a whole, had a slight decrease in population of 0.6 percent. Of the two counties in the assessment area, Macomb County had the greater population increase at 6.7 percent; however, Oakland County's population by number was far greater, with 1.2 million residents as of 2010. A community representative in Oakland County indicated that the population increases have been nominal with the migration of new residents being offset by residents leaving the area.

Population Change 2000 and 2010			
Area	2000 Population	2010 Population	Percentage Change (%)
Assessment Area	1,982,305	2,043,340	3.1
Macomb County	788,149	840,978	6.7
Oakland County	1,194,156	1,202,362	0.7
Warren-Troy-Farmington Hills, MI MD 47664	2,391,395	2,475,666	3.5
State of Michigan	9,938,444	9,883,640	-0.6
<i>Source: 2000—U.S. Census Bureau: Decennial Census                      2010—U.S. Census Bureau: Decennial Census</i>			

## Income Characteristics

According to the 2010 U.S. Census Bureau, both counties within the assessment area experienced an increase in median family income from 2000 to 2010. Oakland County experienced the greatest increase in median family income at 12.2 percent, while Macomb County only experienced an increase of 7.3 percent; however, both counties were outperformed by the state of Michigan with a median family increase of 12.9 percent. Overall, the median family income among the counties in the assessment area remains higher than the aggregate state of Michigan at \$60,341.

Of the 539,720 families living in the assessment area, 20.0 percent are designated as low-income and 17.9 percent area designated as moderate-income, with 6.6 percent living below poverty. Macomb County has a higher concentration of low- and moderate-income families than Oakland County. While the income demographic composition of the assessment area is generally consistent with the state of Michigan, there is a higher concentration of families living below poverty at the state level at 10.6 percent.

Median Family Income Change 2000 and 2010			
Area	2000 Median Family Income (\$)	2006-2010 Median Family Income (\$)	Percentage Change (%)
Assessment Area	NA	76,427	NA
Macomb County	62,816	67,423	7.3
Oakland County	75,540	84,783	12.2
Warren-Troy-Farmington Hills, MI MD 47664	NA	75,314	NA
State of Michigan	53,457	60,341	12.9

*Source: 2000—U.S. Census Bureau: Decennial Census  
2006-2010—U.S. Census Bureau: American Community Survey*

### Bankruptcy Characteristics

Each of the two counties displayed decreases in the number of personal bankruptcy filings, according to the Administrative Office of the U.S. Courts. From the beginning of 2010 through the end of 2013, Macomb County’s personal bankruptcy filings decreased from 9.4 to 5.3 per 1,000 in population. Oakland County declined from 7.5 to 4.1 during the same period. In comparison the, state of Michigan declined from 6.7 to 4.2. Overall, the personal bankruptcy rate in Macomb County remains higher than that of Oakland County or the state of Michigan. However, both Oakland and Macomb Counties experienced a greater rate of decrease than the state of Michigan between 2010 and 2013.

### Housing Costs

According to the 2010 U.S. Census Bureau, both counties within the assessment area experienced an increase in median housing value and median gross rent from 2000 to 2010. As of 2010, Oakland County had the highest median housing value in the assessment area at \$204,300. Similarly, Oakland County also had the highest rate of increase in median housing value between 2000 and 2010 in the assessment area; however, the state of Michigan outperformed both Oakland and Macomb Counties with a median housing value increase of 30.7 percent. Oakland County had the highest median gross rent in 2010 at \$871, surpassing both Macomb County and the state of Michigan. The rate of increase in median gross rent was comparable in both counties; however, it was surpassed by the state of Michigan that experienced a 32.4 percent increase in median gross rent between 2000 and 2010.

There are a total of 882,220 housing units in the assessment area, of which 2.7 percent are located in low-income census tracts and 18.4 percent are located in moderate-income census tracts. Nearly half, 47.6 percent, of housing units in low-income census tracts are rental units. The majority, 59.4 percent, of housing units in moderate-income census tracts are owner-occupied units. Although low- and moderate-income census tracts represent 21.1 percent of the total housing units, they also contain 37.0 percent of the number of vacant units across the assessment area.

A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix C. A higher ratio supports more affordable housing opportunities. Based on the 2006-2010 American Community Survey data, the affordability ratio for the assessment area is 0.34, which is consistent with the state of Michigan.

Housing Costs Change							
Area	Median Housing Value			Median Gross Rent			Affordability Ratio
	2000 (\$)	2006-2010 (\$)	% Change	2000 (\$)	2006-2010 (\$)	% Change	2006-2010
Assessment Area	--	177,563	NA	--	823	N/A	0.34
Macomb County, MI	134,900	157,000	16.4	603	752	24.7	0.34
Oakland County, MI	173,800	204,300	17.5	707	871	23.2	0.32
Warren-Troy-Farmington Hills, MI MD 47664	--	177,745	NA	--	812	N/A	0.34
State of Michigan	110,300	144,200	30.7	546	723	32.4	0.34

*Source: 2000—U.S. Census Bureau: Decennial Census; 2006-2010—U.S. Census Bureau: American Community Survey*

### Foreclosure Characteristics

According to a study conducted by the Federal Reserve Bank of Chicago, foreclosure inventory rates are decreasing in both the state of Michigan and across the assessment area. The foreclosure inventory rate measures the number of residential properties in some phase of foreclosure. It excludes properties that have completed the foreclosure cycle. From the period of January of 2012 through December of 2014 the rate at the state level decreased from 2.2 percent to 0.6 percent. Macomb and Oakland Counties had rates below the state at the end of 2014 with 0.5 and 0.3 percent, respectively.

### Employment Conditions

The assessment area, along with the state of Michigan, has shown steady improvement with regard to unemployment. In 2010, Michigan, with a 12.7 percent unemployment rate, ranked 49<sup>th</sup> among the 50 states in unemployment having the second highest unemployment rate behind Nevada at 13.5 percent. Between 2010 and 2013, the state unemployment rate declined to 8.8 percent. The counties of Macomb and Oakland each showed improvement in 2013 with unemployment rates of 9.1 and 8.1 percent respectively. A community representative from Oakland County attributed the declining unemployment rates in recent years to dynamic changes in the automobile industry. The implementation of new technologies led to creation of highly technical positions in the area as well as aerospace spinoffs.



Unemployment Rates (%)				
Region	2010	2011	2012	2013
Macomb County	13.9	11.5	10.4	9.1
Oakland County	12.4	10.0	9.1	8.1
Warren-Troy-Farmington Hills, MI MD 47664	13.3	10.8	9.8	8.7
State of Michigan	12.7	10.3	9.1	8.8

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

## Industry Characteristics

The following table presents the largest employers operating in the counties comprising the assessment area. According to location quotients developed by the U.S. Bureau of Labor Statistics, the assessment area contains a highly diverse employment base but is most heavily impacted by the industries of manufacturing, medical care, good-producing, and financial activities. Hospitals and manufacturing have become the primary major employers within the assessment area. Three of the four largest employers in Macomb and Oakland Counties are transportation related, reflecting the increase in motor vehicle production which went from 8.7 million in 2011 to 11.7 million in 2014.

Largest Employers in the Assessment Area			
Company	Number of Employees	Industry	County
General Motors Technical Center	17,096	Financing-Automotive	Macomb
Beaumont Hospital	14,950	Hospitals	Oakland
Delphi Thermal Systems	11,000	Automobile Radiator-Manufacturers	Oakland
US Army Tank Automotive Command	3,480	Federal Government-National Security	Macomb
TTI Global	1,849	Automobile Repairing & Service	Oakland
St. John Macomb-Oakland Hospital	1,800	Hospitals	Macomb
St. Joseph Mercy Oakland Hospital	1,500	Hospitals	Oakland
Palace Sports & Entertainment	1,500	Entertainment Bureaus	Oakland
Technical Training Inc.	1,350	Writers	Oakland
Shore Mortgage	1,200	Real Estate Loans	Oakland

Source: Info USA

## Community Representatives

Community representative information was received from local contacts who are familiar with the housing and business activities in each of the counties. There is a general consensus that the economic climate has greatly improved over the last few years in the assessment area. Although there has been new job creation and a decline in unemployment, none of the areas have seen indications of upward wage pressure. There has been increased investment from both domestic and foreign sources, and a skill gap is developing especially with engineering and information technology positions. Although still not at the pre-2007 values, housing costs have been trending upward, and residential construction has been increasing in Macomb County due to land

availability. Residential building permits have increased from 2009 to 2014. Concerns were expressed with respect to small business lending and the need for financial institutions to offer micro loans for start-up, expansion, and working capital purposes.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### LENDING TEST

Main Street Bank's performance with regard to the lending test is rated Satisfactory. The bank's loan-to-deposit ratio is more than reasonable, given the bank's size, financial condition, and assessment area credit needs. The majority of home mortgage loans reported under HMDA and small business loans are originated within the assessment area. The geographic distribution of loans reflects reasonable dispersion throughout the assessment area, and the bank displays reasonable distribution among individuals of different income levels, including low- and moderate-income, and businesses of different sizes.

### Loan-to-Deposit Ratio

In comparison to a sample of local competitors, Main Street Bank's average loan-to-deposit ratio (LTD) is more than reasonable, given the bank's size, financial condition, and the assessment area credit needs. The bank's most recent LTD ratio was 107.5 percent, with a 16-quarter average of 98.7 percent ending September 30, 2015. Overall, the bank's LTD ratio has generally increased during the 16-quarter time frame. The bank's LTD is also above the performance of local competitors, two of which are multi-branch organizations and two that are single bank branch entities.

The following table illustrates the bank's LTD ratio for the 16 quarters since the previous evaluation dated November 28, 2011. The table also compares this data with similar data for local competitors.

	Loan-to-Deposit Ratio (%)
	16 – Quarter Average
Main Street Bank	98.7
<b>Competitors</b>	
Bank of Birmingham	92.8
Bank of Michigan	86.4
Level One Bank	87.4
Talmer Bank & Trust Co.	80.1



## Assessment Area Concentration

The following table summarizes the bank's lending inside and outside its assessment area by product. Overall, a majority of loans were originated within the bank's assessment area. HMDA-reportable loans accounted for 98.9 percent of the originations within the assessment area for the review period. Of the 4,412 HMDA-reportable loans originated during the evaluation period, 76.5 percent were originated inside the assessment area by number and 76.4 percent by dollar. The majority of HMDA-reportable loans originated within the assessment area were refinance and home purchase loans. Similarly, of the 55 small business loans originated during the evaluation period, 67.3 percent were originated in the assessment area by number and 72.4 percent by dollar.

<b>Lending Inside and Outside the Assessment Area</b>								
<b>HDMA-Reportable Loans Originated January 1, 2012 to December 31, 2014</b>								
<b>Small Business Loans Originated July 1, 2014 to December 31, 2014</b>								
LOAN TYPE	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	68	77.3	13,765	73.4	20	22.7	4,987	26.6
Home Purchase Conventional	1,312	77.1	269,784	76.6	389	22.9	82,470	23.4
Home Purchase FHA	622	76.5	86,903	79.2	191	23.5	22,865	20.8
Multi-Family Housing	12	85.7	6,006	89.4	2	14.3	713	10.6
Refinancing	1,360	75.7	293,462	75.4	436	24.3	95,899	24.6
<b>Total HMDA-reportable</b>	<b>3,374</b>	<b>76.5</b>	<b>669,920</b>	<b>76.4</b>	<b>1,038</b>	<b>23.5</b>	<b>206,934</b>	<b>23.6</b>
<b>Total Small Business</b>	<b>37</b>	<b>67.3</b>	<b>6,949</b>	<b>72.4</b>	<b>18</b>	<b>32.7</b>	<b>2,649</b>	<b>27.6</b>
<b>Total Loans</b>	<b>3,411</b>	<b>76.4</b>	<b>676,869</b>	<b>76.4</b>	<b>1,056</b>	<b>23.6</b>	<b>209,583</b>	<b>23.6</b>

*Note: Percentages may not total to 100 percent due to rounding.*

## Geographic Distribution of Loans

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.

### HMDA-Reportable Loans

Geographic distribution of HMDA-reportable loans reflects reasonable dispersion throughout the assessment area. In 2014, the bank originated HMDA-reportable loans in 68.5 percent of the census tracts in the assessment area, including 56.0 percent of the moderate-income census tracts within the assessment area. However, the bank only originated HMDA-reportable loans in 8.4 percent of the low-income census tracts within the assessment area. In 2013, the bank originated HMDA-reportable loans in 67.7 percent of the census tracts in the assessment area, including 6.5 percent of low-income census tracts and 51.7 percent of moderate-income census tracts. In 2012, the bank originated HMDA-reportable loans in 67.7 percent of the census tracts in the assessment

area, including 9.7 percent of low-income census tracts and 41.4 percent of moderate-income census tracts. Overall, the bank has exhibited a positive trend in its ability to penetrate the low- and moderate-income census tracts within its assessment area between 2012 and 2014.

#### *Home Purchase*

Home purchase loans represented 73.6 percent of the bank's total HMDA-reportable loans in 2014. The bank originated 0.7 percent of its home purchase loans in low-income census tracts, consistent with the aggregate of lenders at 1.0 percent and the percentage of owner-occupied units in low-income census tracts at 2.7 percent. The bank originated 13.7 percent of its home purchase loans in moderate-income census tracts, consistent with the aggregate of lenders at 13.8 percent, but slightly below the percentage of owner-occupied in moderate-income census tracts at 18.4 percent. The majority (45.7 percent) of the bank's home purchase loans were originated in middle-income census tracts, consistent with the aggregate of lenders at 47.1 percent as well as the percentage of owner-occupied units in middle-income census tracts at 45.7 percent. Lastly, the bank originated 39.9 of its home purchase loans in upper-income census tracts, consistent with the aggregate of lenders at 38.1 percent and slightly above the percentage of owner-occupied units at 33.2 percent. Overall, the geographic distribution of home purchase loan volume by dollar was consistent with the respective percentages of loan volume by number.

The bank's home purchase lending patterns in 2013 and 2012 are generally consistent with the lending patterns of 2014 by both number and dollar volume. In both years, the bank performed consistently with the aggregate of lenders. Notably, there has been a slight increase in the percentage of lending in both low- and moderate-income census tracts from 2012 through 2014.

#### *Refinance*

Refinance loans represented 23.6 percent of the bank's total HMDA-reportable loans in 2014. The bank originated 0.5 percent of its refinancing loans in low-income census tracts, consistent with the aggregate of lenders at 1.0 percent and the percentage of owner-occupied units in low-income census tracts at 2.7 percent. The bank originated 6.4 percent of its refinance loans in moderate-income census tracts, performing below the aggregate of lenders at 11.5 percent and the percentage of owner-occupied in moderate-income census tracts at 18.4 percent. The bank originated 38.6 percent of its refinance loans in middle-income census tracts, performing below the aggregate of lenders at 44.3 percent and the percentage of owner-occupied units in middle-income census tracts at 45.7 percent. The majority of the bank's refinance loans were originated in upper-income census tracts at 54.5 percent, outperforming the aggregate of lenders at 44.3 percent and the percentage of owner-occupied units at 33.2 percent. Overall, the geographic distribution of refinance loan volume by dollar was consistent with the respective percentages of loan volume by number; however, a slightly lower percentage of refinance loan dollars were lent in moderate-income census tracts at 2.9 percent when compared to the percentage by number at 6.4 percent.

The bank's refinance lending patterns in 2012 and 2013 are generally consistent with the lending patterns of 2014 by both number and dollar volume. In both years, the bank performed consistently with the aggregate of lenders, with the exception of lending in moderate-income census tract in which the bank was outperformed by the aggregate for both years. However, similar to home purchase lending, there has been a slight increase in the percentage of refinance lending in both low- and moderate-income census tracts from 2012 through 2014.

#### *Home Improvement*

Home improvement loans represented 1.9 percent of the bank's total HMDA-reportable loans in 2014; therefore, minimal weight is attributed to this category. The bank did not originate any home improvement loans in low-income census tracts in 2014, slightly below the aggregate of lenders at 1.4 percent and the percentage of owner-occupied units in low-income census tracts at 2.7 percent. The bank originated 5.6 percent of its home improvement loans in moderate-income census tracts, also below the aggregate of lenders at 15.7 percent and the percentage of owner-occupied in moderate-income census tracts at 18.4 percent. The bank originated 22.2 percent of its home improvement loans in middle-income census tracts, also below the aggregate of lenders at 44.7 percent and the percentage of owner-occupied units in middle-income census tracts at 45.7 percent. The majority of the bank's home improvement loans were originated in upper-income census tracts at 72.2 percent, outperforming both the aggregate of lenders at 38.2 percent and the percentage of owner-occupied units at 33.2 percent. Overall, the geographic distribution of home improvement loan volume by dollar was consistent with the respective percentages of loan volume by number.

The bank's home improvement lending patterns in 2012 and 2013 are generally consistent with the lending patterns of 2014 by both number and dollar volume. In both years the bank fell below the aggregate of lenders in home improvement loans in low- and moderate-income census tracts, with the majority of these loans being originated in upper-income census tracts.

#### *Multi-Family*

Multi-family loans represented less than one percent (0.9 percent) of the bank's total HMDA-reportable loans in 2014; therefore, minimal weight is attributed to this category. The bank did not originate any multi-family loans in low-income census tracts in 2014, slightly below the aggregate of lenders at 4.7 percent and the percentage of multi-family units in low-income census tracts at 12.2 percent. The bank originated 12.5 percent of its multi-family loans in moderate-income census tracts, also below the aggregate of lenders at 24.4 percent and the percentage of multi-family units in moderate-income census tracts at 28.2 percent. The bank originated 75.0 percent of its multi-family loans in middle-income census tracts, outperforming the aggregate of lenders at 55.8 percent and the percentage of multi-family units in middle-income census tracts at 45.1 percent. Lastly, the bank originated 12.5 percent of its multi-family units in upper-income census tracts, consistent with the aggregate of lenders at 15.1 percent and the percentage of multi-family units in

upper-income census tracts at 14.3 percent. Overall, the geographic distribution of multi-family loan volume by dollar was consistent with the respective percentages of loan volume by number.

The bank's multi-family lending patterns in 2012 and 2013 are generally consistent with the lending patterns of 2014 by both number and dollar volume. Loan volume in both years was lower than that of 2014, with only one loan originated in 2012 and three loans originated in 2013. Only one multi-family loan in 2013 was originated in a moderate-income census tract.

The following table presents the bank's 2014 HMDA-reportable lending compared to the aggregated and selected demographic data. The bank's 2012 and 2013 HMDA-reportable lending is included in tables in the appendix.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2014 Warren-Troy-Farmington Hills, MI 47664 MD								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2014			Dollar			
		Count		Agg	Bank			Agg
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	5	0.7	1.0	360	0.3	0.4	2.7
	Moderate	94	13.7	13.8	10,494	8.1	7.8	18.4
	Middle	313	45.7	47.1	51,496	39.5	38.8	45.7
	Upper	273	39.9	38.1	67,879	52.1	53.0	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>685</b>	<b>100.0</b>	<b>100.0</b>	<b>130,229</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	1	0.5	1.0	100	0.2	0.4	2.7
	Moderate	14	6.4	11.5	1,485	2.9	6.6	18.4
	Middle	85	38.6	44.3	14,610	28.6	36.1	45.7
	Upper	120	54.5	43.3	34,967	68.3	56.8	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>220</b>	<b>100.0</b>	<b>100.0</b>	<b>51,162</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	1.4	0	0.0	0.3	2.7
	Moderate	1	5.6	15.7	132	3.6	6.0	18.4
	Middle	4	22.2	44.7	607	16.5	33.5	45.7
	Upper	13	72.2	38.2	2,942	79.9	60.2	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>3,681</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	4.7	0	0.0	4.1	12.2
	Moderate	1	12.5	24.4	250	6.3	17.2	28.2
	Middle	6	75.0	55.8	3,115	77.9	51.3	45.1
	Upper	1	12.5	15.1	635	15.9	27.4	14.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.1
	<b>Total</b>		<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>4,000</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	6	0.6	1.0	460	0.2	0.5	2.7
	Moderate	110	11.8	12.9	12,361	6.5	7.6	18.4
	Middle	408	43.8	45.8	69,828	36.9	38.0	45.7
	Upper	407	43.7	40.3	106,423	56.3	53.8	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>931</b>	<b>100.0</b>	<b>100.0</b>	<b>189,072</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2014 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Loans

Main Street Bank’s geographic distribution of small business loans reflects reasonable distribution throughout the assessment area. In 2014, the bank did not originate any small business loans in low-income census tracts; however, minimal opportunity is present in those geographies as only 4.2 percent of businesses operate in low-income census tracts. The bank originated 16.2 percent of its small business loans in moderate-income census tracts which was comparable to the total businesses operating in those geographies at 18.5 percent. The majority of the bank’s small business loans were originated in middle- and upper-income census tracts, at 40.5 and 43.2 percent, respectively. This is consistent with the majority of businesses operating in the assessment area being located in middle- and upper-income census tracts at 40.1 and 36.8 percent, respectively. Overall, the bank’s small business lending was comparable to total businesses by census tract within the assessment area.

The following table presents the bank’s geographic distribution of small business loans from July 1, 2014 through December 31, 2014 compared to selected demographic data.

<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: 2014 Warren-Troy-Farmington Hills, MI 47664 MD</b>						
	Tract Income Levels	Bank & Demographic Comparison				
		2014		2014		Total Businesses
		Count Bank	Dollar Bank	Dollar Bank	Total Businesses	
#	%	\$ 000s	\$ %	%		
Small Business	Low	0	0.0	0	0.0	4.2
	Moderate	6	16.2	1,354	19.5	18.5
	Middle	15	40.5	3,138	45.2	40.1
	Upper	16	43.2	2,458	35.4	36.8
	Unknown	0	0.0	0	0.0	0.4
	<b>Total</b>	<b>37</b>	<b>100.0</b>	<b>6,949</b>	<b>100.0</b>	<b>100.0</b>

2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

**Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes**

Main Street Bank’s record of lending demonstrates a reasonable distribution among individuals of different income levels and businesses of different sizes. The bank serves low- and moderate-income borrowers and small businesses with reasonable responsiveness to the credit needs within the assessment area.



## HMDA-Reportable Loans

### *Home Purchase*

Home purchase loans represented 73.6 percent of the bank's total HMDA-reportable loans in 2014. The bank originated 13.7 percent of its home purchase loans to low-income borrowers, outperforming the aggregate of lenders at 10.9 percent, but below the percentage of low-income families in the assessment area at 20.0 percent. The bank originated 21.5 percent of its home purchase loans to moderate-income borrowers, consistent with the aggregate of lenders at 21.8 percent and outperforming the percentage of moderate-income families in the assessment area at 17.9 percent. The bank originated 23.6 percent of its home purchase loans to middle-income borrowers, consistent with both the aggregate of lenders at 21.4 percent and the percentage of middle-income families at 20.9 percent. The majority of the bank's home purchase loans were originated to upper-income borrowers at 40.7 percent, outperforming the aggregate of lenders at 33.2 percent, but consistent with the percentage of upper-income families at 41.1 percent. Lastly, the bank originated 0.4 percent of its home purchase loans to unknown-income borrowers, below the aggregate of lenders at 12.7 percent. Overall, the borrower distribution of home purchase loan volume by dollar is consistent with the respective percentages of loan volume by number.

The bank's home purchase lending patterns in 2012 and 2013 are consistent with the lending patterns of 2014 by both number and dollar volume.

### *Refinance*

Refinance loans represented 23.6 percent of the bank's total HMDA-reportable loans in 2014. The bank originated 5.0 percent of its home purchase loans to low-income borrowers, slightly below the aggregate of lenders at 8.5 percent and significantly below the percentage of low-income families in the assessment area at 20.0 percent. The bank originated 15.9 percent of its refinance loans to moderate-income borrowers, consistent with the aggregate of lenders at 16.5 percent and the percentage of moderate-income families in the assessment area at 17.9 percent. The bank originated 22.3 percent of its refinance loans to middle-income borrowers, consistent with both the aggregate of lenders at 20.9 percent and the percentage of middle-income families at 20.9 percent. The majority of the bank's refinance loans were originated to upper-income borrowers at 56.4 percent, outperforming the aggregate of lenders at 41.5 percent and the percentage of upper-income families at 41.1 percent. Lastly, the bank originated 0.5 percent of its refinance loans to unknown-income borrowers, significantly below the aggregate of lenders at 12.6 percent. Overall, the borrower distribution of home purchase loan volume by dollar is consistent with the respective percentages of loan volume by number; however, slightly fewer dollars were lent to low- and moderate-income borrowers than the percentages by number.

The bank's refinance lending patterns in 2012 and 2013 are consistent with the lending patterns of 2014 by both number and dollar volume.

#### *Home Improvement*

Home improvement loans represented 1.9 percent of the bank's total HMDA-reportable loans in 2014; therefore, minimal weight is attributed to this category. The bank originated 5.6 percent of its home improvement loans to low-income borrowers, significantly below both the aggregate of lenders at 11.9 percent and the percentage of low-income families in the assessment area at 20.0 percent. The bank also originated 5.6 percent of its home improvement loans to moderate-income borrowers, significantly below both the aggregate of lenders at 19.3 percent and the percentage of moderate-income families in the assessment area at 17.9 percent. The bank originated 38.9 percent of its home improvement loans to middle-income borrowers, outperforming both the aggregate of lenders at 24.0 percent and the percentage of middle-income families at 20.9 percent. The majority of the bank's home improvement loans were originated to upper-income borrowers at 50.0 percent, outperforming both the aggregate of lenders at 39.1 percent and the percentage of upper-income families at 41.1 percent. Overall, the borrower distribution of home purchase loan volume by dollar is consistent with the respective percentages of loan volume by number; however, slightly fewer dollars were lent to low- and moderate-income borrowers than the percentages by number.

The bank's home improvement lending patterns in 2012 and 2013 are consistent with the lending patterns of 2014 by both number and dollar volume.

#### *Multi-family*

Multi-family loans represented less than one percent of the bank's total HMDA-reportable loans in 2014; therefore, minimal weight is attributed to this category. The bank did not originate any multi-family loans to low-, moderate-, middle-, or upper-income borrowers in 2014. All eight multi-family loans were originated to unknown-income borrowers, consistent with the aggregate of lenders that also originated 100.0 percent of its multi-family loans to unknown-income borrowers.

The bank's multi-family lending patterns in 2012 and 2013 are consistent with the lending patterns of 2014 by both number and dollar volume, as all multi-family loans were originated to unknown-income borrowers.

The following table presents the bank's 2014 HMDA-reportable lending compared to the aggregated and selected demographic data. The bank's 2012 and 2013 HMDA-reportable lending is included in tables in the appendix.



<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2014 Warren-Troy-Farmington Hills, MI 47664 MD</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2014						
		Count		Dollar				
		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank \$ %	Agg \$ %	
Home Purchase	Low	94	13.7	10.9	7,614	5.8	5.0	20.0
	Moderate	147	21.5	21.8	19,516	15.0	14.8	17.9
	Middle	162	23.6	21.4	29,223	22.4	19.6	20.9
	Upper	279	40.7	33.2	73,227	56.2	48.7	41.1
	Unknown	3	0.4	12.7	649	0.5	11.9	0.0
	<b>Total</b>	<b>685</b>	<b>100.0</b>	<b>100.0</b>	<b>130,229</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	11	5.0	8.5	993	1.9	4.3	20.0
	Moderate	35	15.9	16.5	4,905	9.6	10.8	17.9
	Middle	49	22.3	20.9	8,899	17.4	17.5	20.9
	Upper	124	56.4	41.5	36,145	70.6	55.1	41.1
	Unknown	1	0.5	12.6	220	0.4	12.2	0.0
	<b>Total</b>	<b>220</b>	<b>100.0</b>	<b>100.0</b>	<b>51,162</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	1	5.6	11.9	70	1.9	4.0	20.0
	Moderate	1	5.6	19.3	150	4.1	12.8	17.9
	Middle	7	38.9	24.0	1,202	32.7	22.4	20.9
	Upper	9	50.0	39.1	2,259	61.4	56.7	41.1
	Unknown	0	0.0	5.7	0	0.0	4.1	0.0
	<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>3,681</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.0
	Moderate	0	0.0	0.0	0	0.0	0.0	17.9
	Middle	0	0.0	0.0	0	0.0	0.0	20.9
	Upper	0	0.0	0.0	0	0.0	0.0	41.1
	Unknown	8	100.0	100.0	4,000	100.0	100.0	0.0
	<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>4,000</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	106	11.4	9.9	8,677	4.6	4.6	20.0
	Moderate	183	19.7	19.4	24,571	13.0	12.6	17.9
	Middle	218	23.4	21.2	39,324	20.8	18.1	20.9
	Upper	412	44.3	37.0	111,631	59.0	49.9	41.1
	Unknown	12	1.3	12.5	4,869	2.6	14.8	0.0
	<b>Total</b>	<b>931</b>	<b>100.0</b>	<b>100.0</b>	<b>189,072</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2014 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

### Small Business Loans

Main Street Bank demonstrated a reasonable borrower distribution of small business lending. For CRA purposes, small businesses are considered entities with annual revenue of \$1 million or less. Within this category, the bank originated 56.8 percent by number and 46.7 percent by dollar of its commercial loans to small businesses. Although this is less than the 88.6 percentage of small businesses located in the assessment area, it is still determined to be reasonable as a majority of the bank's commercial loans were originated to small businesses. Additionally, the volume of small business originations has decreased since the previous performance evaluation as the bank has placed more emphasis on residential lending initiatives. Of total loans originated to small businesses, 61.9 percent were originated in amounts of \$100,000 or less, which are considered the types of loans that are most beneficial to small businesses.

The following table shows the bank's borrower distribution of small business loans from July 1, 2014 through December 31, 2014.

<b>Small Business Lending By Revenue &amp; Loan Size</b>						
<b>Assessment Area: 2014 Warren-Troy-Farmington Hills, MI 47664 MD</b>						
Product Type		Bank & Demographic Comparison				
		2014		2014		Total Businesses %
		Count Bank		Dollar Bank		
		#	%	\$ 000s	\$ %	
Revenue	\$1 Million or Less	21	56.8	3,244	46.7	88.6
	Over \$1 Million or Unknown	16	43.2	3,705	53.3	11.4
	<b>Total</b>	<b>37</b>	<b>100.0</b>	<b>6,949</b>	<b>100.0</b>	<b>100.0</b>
Loan Size	\$100,000 or Less	20	54.1	1,319	19.0	
	\$100,001 - \$250,000	8	21.6	1,352	19.5	
	\$250,001 - \$1 Million	9	24.3	4,278	61.6	
	<b>Total</b>	<b>37</b>	<b>100.0</b>	<b>6,949</b>	<b>100.0</b>	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	13	61.9	988	30.5	
	\$100,001 - \$250,000	5	23.8	781	24.1	
	\$250,001 - \$1 Million	3	14.3	1,475	45.5	
	<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>3,244</b>	<b>100.0</b>	
Originations & Purchases						
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

### Response to Complaints

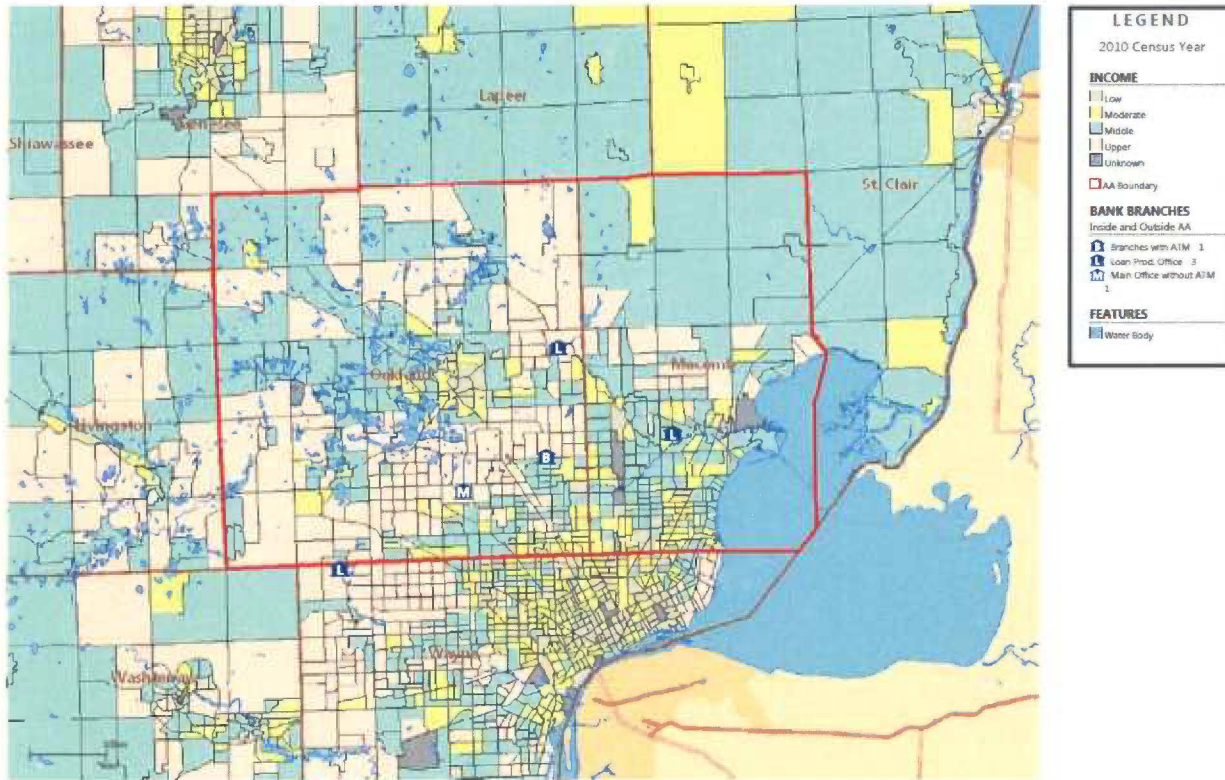
Main Street Bank or this Reserve Bank has not received any CRA-related complaints since the previous examination.

## FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

During the Consumer Compliance examination conducted concurrent with this CRA evaluation, an isolated violation of Section 5 of the Federal Trade Commission Act ("FTC Act"), which prohibits deceptive conduct, was found. At the time of the violation, internal controls and policies and procedures were insufficient to prevent the violation from occurring. Subsequent to this evaluation, management began taking action to address the violation and implemented controls and policies and procedures to prevent such a violation in the future.

### APPENDIX A – Map of Assessment Area

**Main Street Bank 3351440**  
Warren-Troy-Farmington Hills, MI MD 47664



**APPENDIX B – Scope of Examination**

SCOPE OF EXAMINATION			
<b>TIME PERIOD REVIEWED</b>	HMDA activity was reviewed for calendar years 2012 through 2014. Small Business was reviewed from July 1, 2014 through December 31, 2014.		
<b>FINANCIAL INSTITUTION</b>			<b>PRODUCTS REVIEWED</b>
Main Street Bank			First Mortgages & Small Business Loans
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b>
None	N/A		N/A
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAMINATION</b>	<b>BRANCHES VISITED</b>	<b>OTHER INFORMATION</b>
Michigan Macomb and Oakland Counties	Full	None	N/A

## APPENDIX C – Glossary

**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.

**Affordability ratio:** To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

**Aggregate lending:** The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

**Census tract:** Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. They usually have between 2,500 and 8,000 persons, and 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.

**Consumer loan:** A loan 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 of loans: motor vehicle, credit card, home equity, other secured loan, and other unsecured loan.

**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).

**Fair market rent:** Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to permit a selection of units and neighborhoods and low enough to serve as many low-income



families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

**Geography:** A census tract or a block numbering area delineated by the U.S. Bureau of the Census in the most recent decennial census.

**Home mortgage loans:** Include home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**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.

**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 lenders in the MSA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) 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:** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs. A metropolitan statistical area that crosses into two or more bordering states is called a multistate metropolitan statistical area (MMSA). Performance within

each MMSA is analyzed separately as a full-scope review and receives its own ratings under the Lending, Investment and Service Tests provided the financial institution has its main office, branch, or deposit-taking ATM located in each applicable state making up the MMSA.

**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.

**Small loans to business:** A loan included in “loans to small businesses” as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

**Small loans to farms:** 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 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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



**APPENDIX D – Additional Demographic and HMDA-Reportable Loan Data**

Assessment Area: 2013 Warren-Troy-Farmington Hills, MI 47644 MD

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	31	5.6	21,297	3.9	5,892	27.7	108,178	20.0
Moderate-income	116	20.9	101,539	18.8	12,480	12.3	96,429	17.9
Middle-income	239	43.1	239,084	44.3	13,250	5.5	113,025	20.9
Upper-income	163	29.4	177,772	32.9	4,242	2.4	222,088	41.1
Unknown-income	6	1.1	28	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>555</b>	<b>100.0</b>	<b>539,720</b>	<b>100.0</b>	<b>35,864</b>	<b>6.6</b>	<b>539,720</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	47,275	16,933	2.7	35.8	22,495	47.6	7,847	16.6
Moderate-income	191,627	113,875	18.4	59.4	59,348	31.0	18,404	9.6
Middle-income	394,344	283,214	45.7	71.8	82,053	20.8	29,077	7.4
Upper-income	248,571	205,884	33.2	82.8	27,520	11.1	15,167	6.1
Unknown-income	403	9	0.0	2.2	31	7.7	363	90.1
<b>Total Assessment Area</b>	<b>882,220</b>	<b>619,915</b>	<b>100.0</b>	<b>70.3</b>	<b>191,447</b>	<b>21.7</b>	<b>70,858</b>	<b>8.0</b>
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	5,223	4.3	4,294	3.9	698	7.6	231	6.0
Moderate-income	22,612	18.6	19,510	17.9	2,346	25.7	756	19.5
Middle-income	49,019	40.3	44,246	40.7	3,201	35.0	1,572	40.6
Upper-income	44,450	36.5	40,424	37.2	2,734	29.9	1,292	33.4
Unknown-income	474	0.4	296	0.3	160	1.8	18	0.5
<b>Total Assessment Area</b>	<b>121,778</b>	<b>100.0</b>	<b>108,770</b>	<b>100.0</b>	<b>9,139</b>	<b>100.0</b>	<b>3,869</b>	<b>100.0</b>
	Percentage of Total Businesses:			89.3		7.5		3.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	4	0.6	4	0.6	0	0.0	0	0.0
Moderate-income	64	10.0	63	10.0	1	10.0	0	0.0
Middle-income	328	51.3	325	51.6	3	30.0	0	0.0
Upper-income	244	38.1	238	37.8	6	60.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>640</b>	<b>100.0</b>	<b>630</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
	Percentage of Total Farms:			98.4		1.6		0.0

2013 FFIEC Census Data & 2013 Dun & Bradstreet information according to 2010 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2013 Warren-Troy-Farmington Hills, MI 47644 MD								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2013			Dollar			
		Count		Agg	Bank			Agg
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	3	0.4	0.8	276	0.2	0.3	2.7
	Moderate	79	11.4	13.1	7,959	6.2	7.2	18.4
	Middle	293	42.5	46.0	43,280	33.6	37.1	45.7
	Upper	315	45.7	40.2	77,154	60.0	55.4	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>690</b>	<b>100.0</b>	<b>100.0</b>	<b>128,669</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	1	0.3	1.0	101	0.1	0.5	2.7
	Moderate	21	5.4	11.7	2,922	3.6	9.2	18.4
	Middle	141	36.5	43.4	24,311	30.1	37.0	45.7
	Upper	223	57.8	43.9	53,407	66.1	53.2	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>386</b>	<b>100.0</b>	<b>100.0</b>	<b>80,741</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	1.3	0	0.0	0.2	2.7
	Moderate	2	6.5	14.6	273	4.4	5.3	18.4
	Middle	12	38.7	43.6	1,450	23.6	33.0	45.7
	Upper	17	54.8	40.5	4,421	72.0	61.6	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>6,144</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	14.6	0	0.0	12.6	12.2
	Moderate	1	33.3	25.8	1,350	73.1	22.4	28.2
	Middle	2	66.7	44.9	498	26.9	50.4	45.1
	Upper	0	0.0	14.6	0	0.0	14.6	14.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.1
	<b>Total</b>		<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,848</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	4	0.4	1.0	377	0.2	0.8	2.7
	Moderate	103	9.3	12.3	12,504	5.8	8.9	18.4
	Middle	448	40.4	44.3	69,539	32.0	37.4	45.7
	Upper	555	50.0	42.5	134,982	62.1	53.0	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>1,110</b>	<b>100.0</b>	<b>100.0</b>	<b>217,402</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2013 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2013 Warren-Troy-Farmington Hills, MI 47644 MD</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2013						
		Count		Dollar				
		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank \$ %	Agg \$ %	
Home Purchase	Low	92	13.3	12.2	8,109	6.3	5.6	20.0
	Moderate	143	20.7	20.0	18,578	14.4	13.8	17.9
	Middle	163	23.6	22.5	27,068	21.0	20.6	20.9
	Upper	291	42.2	32.9	74,804	58.1	48.6	41.1
	Unknown	1	0.1	12.3	110	0.1	11.3	0.0
	<b>Total</b>	<b>690</b>	<b>100.0</b>	<b>100.0</b>	<b>128,669</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	13	3.4	8.9	1,299	1.6	4.9	20.0
	Moderate	48	12.4	14.4	6,068	7.5	9.4	17.9
	Middle	87	22.5	21.9	15,459	19.1	17.2	20.9
	Upper	232	60.1	42.4	57,087	70.7	50.6	41.1
	Unknown	6	1.6	12.3	828	1.0	18.0	0.0
	<b>Total</b>	<b>386</b>	<b>100.0</b>	<b>100.0</b>	<b>80,741</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	4	12.9	14.0	339	5.5	4.7	20.0
	Moderate	2	6.5	20.5	343	5.6	10.6	17.9
	Middle	6	19.4	23.3	831	13.5	20.3	20.9
	Upper	19	61.3	39.8	4,631	75.4	59.8	41.1
	Unknown	0	0.0	2.4	0	0.0	4.6	0.0
	<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>6,144</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.0
	Moderate	0	0.0	0.0	0	0.0	0.0	17.9
	Middle	0	0.0	0.0	0	0.0	0.0	20.9
	Upper	0	0.0	0.0	0	0.0	0.0	41.1
	Unknown	3	100.0	100.0	1,848	100.0	100.0	0.0
	<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,848</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	109	9.8	10.2	9,747	4.5	5.0	20.0
	Moderate	193	17.4	16.5	24,989	11.5	10.7	17.9
	Middle	256	23.1	22.1	43,358	19.9	18.0	20.9
	Upper	542	48.8	39.0	136,522	62.8	48.6	41.1
	Unknown	10	0.9	12.1	2,786	1.3	17.7	0.0
	<b>Total</b>	<b>1,110</b>	<b>100.0</b>	<b>100.0</b>	<b>217,402</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2013 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Assessment Area: 2012 Detroit-Livonia-Dearborn, MI 19804 MD								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	107	17.5	49,601	11.2	23,040	46.5	108,456	24.6
Moderate-income	174	28.5	113,026	25.6	31,247	27.6	69,943	15.8
Middle-income	144	23.6	115,733	26.2	12,915	11.2	78,019	17.7
Upper-income	176	28.8	163,138	37.0	6,731	4.1	185,088	41.9
Unknown-income	10	1.6	8	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>611</b>	<b>100.0</b>	<b>441,506</b>	<b>100.0</b>	<b>73,933</b>	<b>16.7</b>	<b>441,506</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	124,179	34,403	7.4	27.7	52,130	42.0	37,646	30.3
Moderate-income	235,170	101,457	21.8	43.1	79,002	33.6	54,711	23.3
Middle-income	212,189	132,431	28.5	62.4	53,743	25.3	26,015	12.3
Upper-income	254,622	196,268	42.2	77.1	41,436	16.3	16,918	6.6
Unknown-income	168	44	0.0	26.2	29	17.3	95	56.5
<b>Total Assessment Area</b>	<b>826,328</b>	<b>464,603</b>	<b>100.0</b>	<b>56.2</b>	<b>226,340</b>	<b>27.4</b>	<b>135,385</b>	<b>16.4</b>
	<b>Total Businesses Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	9,176	11.2	7,992	10.8	677	14.5	507	15.3
Moderate-income	17,792	21.7	16,147	21.8	848	18.2	797	24.0
Middle-income	22,004	26.8	19,739	26.7	1,352	29.0	913	27.5
Upper-income	32,782	40.0	29,962	40.5	1,739	37.3	1,081	32.6
Unknown-income	289	0.4	221	0.3	50	1.1	18	0.5
<b>Total Assessment Area</b>	<b>82,043</b>	<b>100.0</b>	<b>74,061</b>	<b>100.0</b>	<b>4,666</b>	<b>100.0</b>	<b>3,316</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>90.3</b>		<b>5.7</b>		<b>4.0</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	18	7.1	17	7.0	1	12.5	0	0.0
Moderate-income	38	15.1	37	15.2	1	12.5	0	0.0
Middle-income	64	25.4	62	25.4	2	25.0	0	0.0
Upper-income	132	52.4	128	52.5	4	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>252</b>	<b>100.0</b>	<b>244</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
	<b>Percentage of Total Businesses:</b>			<b>96.8</b>		<b>3.2</b>		<b>0.0</b>
2012 FFIEC Census Data & 2012 Dun & Bradstreet information according to 2010 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2012 Warren-Troy-Farmington Hills, MI 47644 MD								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2012						
		Count		Agg	Dollar			Agg
		Bank			Bank	Agg		
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	2	0.4	0.7	195	0.2	0.3	2.7
	Moderate	54	9.7	12.3	4,690	4.8	6.7	18.4
	Middle	232	41.5	45.7	33,106	33.9	36.6	45.7
	Upper	271	48.5	41.3	59,798	61.2	56.4	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>559</b>	<b>100.0</b>	<b>100.0</b>	<b>97,789</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	3	0.4	0.8	193	0.1	0.4	2.7
	Moderate	23	3.1	9.9	2,747	1.7	6.2	18.4
	Middle	237	31.4	42.1	38,474	23.8	35.6	45.7
	Upper	491	65.1	47.2	120,145	74.4	57.7	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>754</b>	<b>100.0</b>	<b>100.0</b>	<b>161,559</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	1.4	0	0.0	0.3	2.7
	Moderate	0	0.0	15.4	0	0.0	4.3	18.4
	Middle	2	10.5	41.9	195	4.9	28.7	45.7
	Upper	17	89.5	41.2	3,745	95.1	66.7	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>3,940</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	5.4	0	0.0	7.1	12.2
	Moderate	0	0.0	25.0	0	0.0	21.6	28.2
	Middle	1	100.0	46.4	158	100.0	51.5	45.1
	Upper	0	0.0	23.2	0	0.0	19.9	14.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.1
	<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>158</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	5	0.4	0.8	388	0.1	0.5	2.7
	Moderate	77	5.8	10.6	7,437	2.8	6.6	18.4
	Middle	472	35.4	43.0	71,933	27.3	36.1	45.7
	Upper	779	58.4	45.5	183,688	69.7	56.8	33.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>1,333</b>	<b>100.0</b>	<b>100.0</b>	<b>263,446</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2012 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2012 Warren-Troy-Farmington Hills, MI 47644 MD</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2012			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	87	15.6	15.3	7,487	7.7	7.3	20.0
	Moderate	130	23.3	21.6	16,218	16.6	15.5	17.9
	Middle	121	21.6	21.6	20,487	21.0	20.8	20.9
	Upper	221	39.5	30.1	53,597	54.8	45.6	41.1
	Unknown	0	0.0	11.5	0	0.0	10.9	0.0
	<b>Total</b>		<b>559</b>	<b>100.0</b>	<b>100.0</b>	<b>97,789</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	31	4.1	8.2	3,106	1.9	4.9	20.0
	Moderate	71	9.4	13.5	9,805	6.1	9.4	17.9
	Middle	138	18.3	22.3	23,520	14.6	19.2	20.9
	Upper	479	63.5	43.1	119,505	74.0	53.3	41.1
	Unknown	35	4.6	12.8	5,623	3.5	13.1	0.0
	<b>Total</b>		<b>754</b>	<b>100.0</b>	<b>100.0</b>	<b>161,559</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	1	5.3	15.2	75	1.9	5.2	20.0
	Moderate	2	10.5	21.4	194	4.9	11.7	17.9
	Middle	1	5.3	23.7	192	4.9	20.6	20.9
	Upper	15	78.9	37.1	3,479	88.3	57.6	41.1
	Unknown	0	0.0	2.7	0	0.0	4.9	0.0
	<b>Total</b>		<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>3,940</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.0
	Moderate	0	0.0	0.0	0	0.0	0.0	17.9
	Middle	0	0.0	0.0	0	0.0	0.0	20.9
	Upper	0	0.0	0.0	0	0.0	0.0	41.1
	Unknown	1	100.0	100.0	158	100.0	100.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>158</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	119	8.9	10.2	10,668	4.0	5.4	20.0
	Moderate	203	15.2	15.7	26,217	10.0	10.8	17.9
	Middle	260	19.5	22.1	44,199	16.8	19.2	20.9
	Upper	715	53.6	39.6	176,581	67.0	50.5	41.1
	Unknown	36	2.7	12.4	5,781	2.2	14.1	0.0
	<b>Total</b>		<b>1,333</b>	<b>100.0</b>	<b>100.0</b>	<b>263,446</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2012 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								