



PUBLIC DISCLOSURE

December 3, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

County Savings Bank
Charter Number 703136

410 Wanamaker Ave
Essington, PA 19029

Office of the Comptroller of the Currency

1150 Northbrook Drive
Suite 303
Trevese, PA 19053

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 Satisfactory.

The Lending Test is rated: Satisfactory

Major factors that support this rating are:

- The quarterly average loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated in its assessment area.
- The bank's distribution of home mortgage loans reflects reasonable penetration among borrowers of different income levels.
- The geographic distribution of home mortgage loans in the AA reflects a reasonable dispersion in low- and moderate-income geographies.
- The bank had no consumer complaints regarding its community reinvestment performance.

Definitions and Common Abbreviations

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

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

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

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

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

Geography: A 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

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

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

Metropolitan Statistical Area: 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the 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 One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

County Savings Bank (CSB) is an intrastate mutual thrift institution founded in 1920. The institution, headquartered in Essington, PA, is located in Delaware County. CSB is located in a middle-income geography in Tincum Township. Tincum Township is included in the Philadelphia, PA MSA.

The bank has two branches, one in Tincum Township and another in Ridley Township, PA. CSB offers a drive-thru facility at the Tincum Township branch. CSB offers a full range of banking services including checking accounts, savings programs, money-market accounts, certificates of deposit, residential mortgages, and consumer loans. The institution's public website offers information on banking hours as well as products and services offered.

As of September 30, 2018, CSB had \$84 million in total assets, \$38.6 million in net loans and \$77.8 million in total deposits. Net loans represent 46 percent of total assets. The bank's primary loan product is 1-4 family mortgage loans, which represent 76.7 percent of total loans.

CSB's last Public Evaluation (PE) was dated July 1, 2014, and the institution received a satisfactory rating. Since the previous PE, CSB has changed its strategic initiatives. CSB has not opened or closed any branches since the prior CRA Exam. There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We performed a full scope evaluation of CSB using the Small Bank CRA examination procedures, which only includes a lending test. The current evaluation period covered lending activity from January 1, 2015 to December 31, 2017. We used two evaluation periods for the examination. In 2017, the Office of Management and Budget revised the 2010 U.S. Census data. The changes resulted in differences to the MSA/MD, census tract, and income designations. The first evaluation period covers the bank's lending performance from January 1, 2015 to December 31, 2016. To reflect the census changes, the second evaluation period covered lending performance from January 1, 2017 to December 31, 2017. Our lending performance review focused on home mortgage loans. This is the bank's primary loan product representing 84.7 percent of total loans.

Data Integrity

CSB reports data under the requirements of the Home Mortgage Disclosure Act (HMDA). Prior to this examination, we tested the accuracy of CSB's HMDA data. The results of testing indicated the data was reasonably accurate and reliable. Therefore, we used HMDA data from January 1, 2015 to December 31, 2017 for this evaluation.

Selection of Areas for Full-Scope Review

CSB has one AA that includes the majority of Delaware County, PA, where CSB is headquartered. CSB has identified 112 census tracts (CTs) across Delaware County that comprise its AA. The AA has not changed since the last PE was published. It continues to meet regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies. We performed a full-scope review of the bank's sole AA. Refer to the table in Appendix B for demographic information on the AA.

In 2015-2016, the AA consisted of 112 CTs. Based on the 2010 Census data used for 2015-2016, there were three (3 percent of AA) low-income tracts, 19 (17 percent of AA) moderate-income tracts, 32 (29 percent of AA) middle-income tracts, and 58 (51 percent of AA) upper-income tracts.

The census data change in 2017 altered the income designations of several CTs in the bank's AA. The bank maintained the same 112 CTs in the AA. Based on the 2015 ACS Census data effective as of 2017, there were three (3 percent of AA) low-income tracts, 23 (20.5 percent of AA) moderate-income tracts, 23 (20.5 percent of AA) middle-income tracts, and 63 (56 percent of AA) upper-income tracts.

Ratings

The bank's overall rating is based on the full scope review of the AA described above. The only applicable performance test is the lending test.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

CSB's performance under the Lending Test is Satisfactory. CSB's quarterly average loan-to-deposit ratio is reasonable. A majority of CSB's home mortgage loans were originated within the bank's AA. CSB's mortgage loan distribution reflects reasonable penetration among borrowers of different income levels. CSB's geographic distribution of mortgage loans reflects reasonable dispersion throughout geographies of different income levels.

Loan-to-Deposit Ratio

CSB's quarterly average net loan-to-deposit ratio is reasonable. The bank's quarterly average net loan-to-deposit ratio over the 18 quarters since the last CRA examination was 56.32 percent. During this period, the ratio ranged from a quarterly low of 49.00 percent to a quarterly high of 65.41 percent. CSB's quarterly average net loan-to-deposit ratio is somewhat lower than that of a custom peer group of other Pennsylvania institutions of similar size. The custom peer group consisted of seven thrifts located in Pennsylvania with assets under \$200 million. The quarterly average of these banks over the same 18 quarters was 67.35 percent. While the bank's quarterly average net loan-to-deposit ratio is somewhat lower than the custom peer group, it is reasonable when taking into consideration the bank's small size, lending market share, and strong competition for loans within the AA.

Lending in Assessment Area

A majority of the home mortgage loans originated during the evaluation period were within the bank's AA. Table D below shows the comparison of mortgages extended inside and outside of the assessment area:

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$000s
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2015	14	60.9	9	39.1	23	1,515	43.6	1,963	56.4	3,478
2016	38	86.4	6	13.6	44	3,342	72.7	1,254	27.3	4,596
2017	14	58.3	10	41.7	24	1,306	49.5	1,332	50.5	2,638
Subtotal	66	72.5	25	27.5	91	6,163	57.5	4,549	42.5	10,712
Total	66	72.5	25	27.5	91	6,163	57.5	4,549	42.5	10,712

Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data Due to rounding, totals may not equal 100.0

For mortgage loans originated from 2015-2016, management originated 77 percent by number and 60.2 percent by dollar value within the AA. In 2017, management originated 58.3 percent by number and 49.5 percent by dollar value within the AA. In aggregate, management originated 72.5 percent of loans by number and 57.5 percent by dollar value within the AA.

Lending to Borrowers of Different Incomes

Based on Appendix C, Tables P1 and P2, CSB's distribution of mortgage loans reflects reasonable penetration among borrowers of different income levels. The borrower distribution of mortgage loans in 2015-2016 is reasonable, while the borrower distribution of mortgage loans in 2017 is excellent.

The distribution of mortgage loans during the 2015-2016 evaluation period reflects reasonable penetration among borrowers of different income levels. The percentage of loans made to low-income borrowers was below the percentage of low-income families in the AA. However, the bank's performance with low-income borrowers significantly exceeded the aggregated percentage of peer loans made to low-income borrowers during the period. The percentage of home mortgage loans made to moderate-income borrowers was below the percentage of moderate-income families in the AA. However, the bank's performance with moderate-income borrowers exceeded the aggregated percentage of peer loans made to moderate-income borrowers.

The distribution of mortgage loans in 2017 reflects excellent penetration among borrowers of different income levels. The percentage of loans made to low-income borrowers was below the percentage of low-income families in the AA. However, the

bank's performance with low-income borrowers significantly exceeded the aggregated percentage of peer loans made to low-income borrowers in 2017. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. CSB also exceeded the aggregated percentage of peer loans made to moderate-income borrowers in 2017.

Geographic Distribution of Loans

Based on Tables O1 and O2 in Appendix C, the geographic distribution of loans reflects reasonable dispersion throughout geographies of different income levels. The geographic distribution of mortgage loans in 2015-2016 was excellent. The geographic distribution of mortgage loans in 2017 was reasonable.

During the 2015-2016 evaluation period, the percentage of home mortgage loans made in low-income geographies exceeded the percentage of owner-occupied housing in those geographies. The percentage of home mortgage loans made in moderate-income geographies was near to the percentage of owner-occupied housing within moderate-income geographies. In addition, CSB exceeded the aggregated percentage of peer loans made within both low- and moderate-income geographies during the 2015-2016 evaluation period.

During the 2017 evaluation period, CSB made no mortgage loans within low-income geographies. However, opportunities to lend in the low-income CTs are limited. There are only 1,071 owner-occupied units in these tracts. A large number of institutions (357) compete for mortgage loans in this market. The percentage of mortgage loans CSB made within moderate-income geographies was near to the percentage of owner-occupied housing within those geographies. CSB's performance was also comparable to the aggregate percentage of peer loans made within moderate-income geographies during 2017.

Responses to Complaints

The bank has not received any CRA-related consumer complaints since the last CRA examination.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): (1/01/2015 to 12/31/2017) Investment and Service Tests and CD Loans: NA	
Financial Institution	Products Reviewed	
County Savings Bank (CSB) Essington, PA	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
No Affiliates	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
County Savings Bank AA	Full Scope Review	For the period from January 1, 2015 through December 31, 2016, the data from the 2010 U.S. Census was used in our analysis. For the period from January 1, 2017 through December 31, 2017, data from the 2010 U.S. Census was also used in our analysis but was modified to include 2017 Office of Management and Budget census updates.

Appendix B: Community Profiles for Full-Scope Areas

County Savings Bank AA 2015 - 2016

Table A - Demographic Information of the Assessment Area 2015-2016

Assessment Area: CSB's AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	112	2.7	17.0	28.6	51.8	0.0
Population by Geography	411,900	1.6	17.0	24.3	57.0	0.0
Housing Units by Geography	169,101	2.1	16.5	25.8	55.6	0.0
Owner-Occupied Units by Geography	107,110	1.0	10.2	23.5	65.3	0.0
Occupied Rental Units by Geography	48,436	3.4	26.3	30.8	39.5	0.0
Vacant Units by Geography	13,555	5.9	31.7	26.4	36.0	0.0
Businesses by Geography	25,427	1.5	12.3	25.2	61.1	0.0
Farms by Geography	427	0.5	6.3	16.6	76.6	0.0
Family Distribution by Income Level	102,005	14.7	13.9	17.4	54.0	0.0
Household Distribution by Income Level	155,546	16.8	12.8	15.7	54.7	0.0
Median Family Income MSA - 37964 Philadelphia, PA MD		\$54,139	Median Housing Value			\$193,057
			Median Gross Rent			\$864
			Families Below Poverty Level			8.6%

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

Due to rounding, totals may not equal 100.0

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

Based on data from the 2010 U.S. Census, the weighted average median cost of housing in the AA was \$193,057. The FFIEC adjusted median family income for 2016 was \$55,400. The percentage of households below the poverty level in 2010 in the AA was 10.46 percent. The population for the AA was comprised of 102,005 families. The unemployment rate across the AA was 5.37 percent, which compares favorably to the 8.0 percent unemployment rate for the Commonwealth of Pennsylvania in 2010. The family income distribution details that 14.7 percent were low-income, 13.9 percent were moderate-income, 17.4 percent were middle-income, and 54.0 percent were upper-income.

According to 2016 Peer Deposit Data, CSB's is ranked 20th out of 24 institutions in the AA with a market deposit share of 0.84 percent of total deposits. The primary competitors within the AA are: TD Bank, NA (ten offices, 18.35 percent market share), Wells Fargo Bank, NA (thirteen offices, 13.89 percent market share), Citizens Bank (fourteen offices, 11.73 percent market share), PNC Bank, NA (eight offices, 11.30 percent market share), and Franklin Mint Federal Credit Union (one office, 10.76 percent market share).

Competition for loans in the AA is strong. According to 2016 Peer Mortgage Data, CSB's ranked 70th out of 357 mortgage lenders in the AA, with a market share of 0.36 percent of mortgage loans. CSB's major competitors in 2016 were: Wells Fargo Bank, NA (13.49 percent market share), Freedom Mortgage Corporation (5.17 percent market share), Quicken Loans (3.70 percent market share), Pennymac Loan Services, LLC (3.09 percent market share), and Franklin Mint Federal Credit Union (3.06 percent market share).

The economy is stable. The major employment sectors in Delaware County are health care and social assistance, retail trade, education services, and accommodation and food services. The major employers are The Boeing Company, Prospect CCMC LLC, United Parcel Service Inc., Delaware County, AmeriHealth Mercy Services LLC, and Wawa, Inc.

County Savings Bank AA 2017

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	112	2.7	20.5	20.5	56.3	0.0
Population by Geography	413,647	1.7	18.7	20.3	59.4	0.0
Housing Units by Geography	168,114	1.9	18.8	20.0	59.2	0.0
Owner-Occupied Units by Geography	101,655	0.8	10.8	18.6	69.9	0.0
Occupied Rental Units by Geography	50,621	3.8	29.3	22.7	44.2	0.0
Vacant Units by Geography	15,838	3.8	37.2	20.2	38.8	0.0
Businesses by Geography	25,395	0.8	15.6	18.6	65.0	0.0
Farms by Geography	443	0.5	7.0	15.1	77.4	0.0
Family Distribution by Income Level	100,593	15.8	13.6	17.1	53.5	0.0
Household Distribution by Income Level	152,276	17.6	12.9	15.5	54.0	0.0
Median Family Income MSA - 37964 Philadelphia, PA MD		\$56,411	Median Housing Value			\$186,142
			Median Gross Rent			\$963
			Families Below Poverty Level			9.4%

*Source: 2015 ACS Census and 2017 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

Based on data from the 2015 ACS Census, the weighted average median cost of housing in the AA was \$186,142. The FFIEC adjusted family income for 2017 is \$57,400. The percentage of households below the poverty level in the AA is 11.80 percent. The population for the AA is comprised of 100,593 families. The unemployment rate across the AA is 6.04 percent, which slightly exceeds the 5.2 percent unemployment rate for the Commonwealth of Pennsylvania in 2015. The family

income distribution details that 15.8 percent are low-income, 13.6 percent are moderate-income, 17.1 percent are middle-income, and 53.5 percent are upper-income.

The 2017 Peer Deposit Data indicates that CSB ranked 18th out of 26 institutions in the AA with a deposit market share of 1.02 percent of total deposits. CSB's primary competitors are: TD Bank, NA (ten offices, 20.77 percent market share), Wells Fargo Bank, NA (thirteen offices, 15.23 percent market share), Citizens Bank (fifteen offices, 13.45 percent market share), PNC Bank, NA (eight offices, 12.73 percent market share), and Sun East Federal Credit Union (one office, 6.50 percent market share).

Competition for loans in the AA is strong. According to 2017 Peer Mortgage Data, CSB's ranked 117th out of 352 mortgage lenders in the AA, with a market share of 0.14 percent of mortgage loans. CSB's major competitors in 2017 were: Wells Fargo Bank, NA (11.8 percent market share), Quicken Loans (3.84 percent of market share), Freedom Mortgage Corporation (3.70 percent of market share), Pennymac Loan Services, LLC (3.46 percent of market share), and JP Morgan Chase Bank, NA (3.42 percent of market share)

Community Contact

We reviewed the OCC Community Contact Database during this examination to determine local community needs. We reviewed an interview of a local community organization performed by the OCC in 2017. The organization provides home buyer assistance, personal financial counseling, and business planning assistance. The contact stated the local community credit needs include loans to renovate aging and vacant homes, loans to small businesses, and financial counseling for borrowers.

Appendix C: Tables of Performance Data

Content of Standardized Tables

For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which result from how they are generated in supervisory analytical systems.

The following is a listing and brief description of the tables included:

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents aggregate peer data for the years the data is available.

Table O1 : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
County Savings AA	52	4,857	100.0	10,671	1.0	5.8	0.2	10.2	9.6	5.6	23.5	34.6	20.9	65.3	50.0	73.2	0.0	0.0	0.0
Total	52	4,857	100.0	10,671	1.0	5.8	0.2	10.2	9.6	5.6	23.5	34.6	20.9	65.3	50.0	73.2	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O2 : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
County Savings AA	14	1,306	100.0	9,919	0.8	0.0	0.3	10.8	7.1	7.2	18.6	50.0	17.8	69.9	42.9	74.7	0.0	0.0	0.0
Total	14	1,306	100.0	9,919	0.8	0.0	0.3	10.8	7.1	7.2	18.6	50.0	17.8	69.9	42.9	74.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P1: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2015-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
County Savings AA	52	4,857	100.0	10,671	14.7	5.8	2.1	13.9	1.9	9.8	17.4	19.2	16.9	54.0	67.3	47.8	0.0	5.8	23.4
Total	52	4,857	100.0	10,671	14.7	5.8	2.1	13.9	1.9	9.8	17.4	19.2	16.9	54.0	67.3	47.8	0.0	5.8	23.4

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P2: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
County Savings AA	14	1,306	100.0	9,919	15.8	7.1	2.9	13.6	14.3	10.9	17.1	7.1	18.5	53.5	64.3	48.3	0.0	7.1	19.4
Total	14	1,306	100.0	9,919	15.8	7.1	2.9	13.6	14.3	10.9	17.1	7.1	18.5	53.5	64.3	48.3	0.0	7.1	19.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0