Fair Lending Peer Review
Townstone Financial, Inc.
HMDA DATA 2014-2016
July 2019
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</tr>
<tr>
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<td>42</td>
</tr>
<tr>
<td>Greater Chicago Area MSA - Loans</td>
<td>43</td>
</tr>
<tr>
<td>Chicago-Joliet-Naperville, MSA - Applications</td>
<td>44</td>
</tr>
<tr>
<td>Chicago-Joliet-Naperville, MSA Loans</td>
<td>45</td>
</tr>
<tr>
<td>Cook County, Illinois - Applications</td>
<td>46</td>
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<tr>
<td>Cook County, Illinois - Loans</td>
<td>47</td>
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</table>
Engagement Objective and Scope

Garris Horn PLLC ("Garris Horn"), lead counsel for their client Townstone Financial, Inc. ("Townstone" or "Company"), jointly with the law firms of Mattingly Burke Cohen & Biederman ("MBCB") and the Sterbcow Law Group ("SLG") (hereinafter, Garris Horn, MBCB and SLG are collectively referred to as "Legal Counsel") engaged CrossCheck Compliance LLC ("CrossCheck" or "Consultant") to provide an objective review of Townstone’s lending activity based on Home Mortgage Disclosure Act ("HMDA") data from 2014, 2015, and 2016, to assist Legal Counsel with their representation and defense of Townstone in connection with a Civil Investigative Demand ("CID") it received from the Consumer Financial Protection Bureau ("CFPB") in June 2017. The 2014-2016 HMDA data would have been available to the CFPB when it issued the CID. This engagement is performed at the direction of Legal Counsel in accordance with their joint defense and common interests.

The review primarily focused on lending to majority minority census tracts within the Chicago Metropolitan Statistical Area ("MSA"). At Legal Counsel’s instruction, CrossCheck conducted a peer analysis using both potential peers identified by Legal Counsel and additional peers identified by CrossCheck.

Executive Summary

Peer analysis results indicated that Townstone was not an outlier, having applications/origination percentages within the ranges of the identified peers for both substantial minority areas and South Chicago Majority African American Census Tracts.

Peer analysis is conducted by identifying similarly situated lending companies. Considerations are made for structure of company, type of products offered, and lending footprint. As a non-delegated mortgage lender during the applicable time period, Townstone offered a variety of mortgage products that were available from a network of investors.

During the applicable time period, Townstone was a non-delegated correspondent lender. Townstone was generally not responsible for underwriting or the credit decision made on mortgage loan applications, which differentiates it from other institutions that are required to collect, record, and disclose data under the Home Mortgage Disclosure Act (HMDA). For this reason, during the peer review process, CrossCheck was unable to consider true similarly situated companies, as those with a similar business model to Townstone generally do not report data under HMDA. However, during the peer identification process CrossCheck relied on lending product, average yearly production, and lending footprint to identify those companies that were similarly situated to Townstone.

A review was completed of Townstone’s lending within the Chicago area MSAs as defined below. In addition, peer analysis was conducted using both peers identified by Legal Counsel and those identified by CrossCheck. Results of the analysis indicated that Townstone received 9.06% of its
applications from 50% to less than 80% minority census tracts and 1.90% from 80% to 100% minority census tracts.

**Definitions**


**South Chicago Majority African American Census Tracts** – A selection of census tracts located in Cook County, Illinois south of Interstate Highway 55 and north and east of Interstate Highways 94/294 with African American populations greater than 50% of the total census tract population. Please see Appendix A for the list of census tracts included.

**Substantial Minority Census Tract** – A census tract with greater than 50% of its population being Asian, African American, Hispanic, Pacific Islander, or American Indian.

**All MSAs** – Represents all census tracts where application and loan production are present.

**Cook County** – Cook County, Illinois (State code 17, County code 031).

**Counsel Peers** – Potential peer institutions identified by the Legal Counsel. Although this report uses the word “peers” when referring to these institutions, CrossCheck has not independently verified whether these institutions are, in fact, peers of Townstone.

**Additional Peers** – Peer institutions identified by CrossCheck Compliance.

Townstone Lending Overview

Townstone’s applications are primarily conventional, first lien, refinance mortgages. Over the Review Period, Townstone brokered 40 high-priced loans (2.58% of originated transactions) and no loans subject to the Home Ownership and Equity Protection Act (HOEPA). The Company is not considered a high-priced lender.

During the Review Period, Townstone Financial received 2,262 applications across its lending footprint. Most applications, 91.73%, were from the Greater Chicago Area MSA and 69.50% were from Cook County, Illinois where the Company was headquartered during the Review Period. Townstone received 2,075 applications from the Greater Chicago MSA from 2014 to 2016 representing 0.17% of all HMDA reported applications during the Review Period.

### Townstone Lending Summary

<table>
<thead>
<tr>
<th>Year</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loan Type</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Conventional</td>
<td>569</td>
<td>84.80</td>
<td>598</td>
<td>83.75</td>
</tr>
<tr>
<td>FHA</td>
<td>91</td>
<td>13.56</td>
<td>101</td>
<td>14.15</td>
</tr>
<tr>
<td>VA</td>
<td>11</td>
<td>1.64</td>
<td>15</td>
<td>2.10</td>
</tr>
<tr>
<td>FSA/RHS</td>
<td>0</td>
<td>0.00</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>Property Type</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>One to Four Family</td>
<td>671</td>
<td>100.00</td>
<td>714</td>
<td>100.00</td>
</tr>
<tr>
<td>Manufactured Housing</td>
<td>0</td>
<td>0.00</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>Multifamily</td>
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<td>0</td>
<td>0.00</td>
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<tr>
<td>Loan Purpose</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Home Purchase</td>
<td>211</td>
<td>31.45</td>
<td>112</td>
<td>15.69</td>
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<tr>
<td>Home Improvement</td>
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<td>0.00</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>Refinancing</td>
<td>460</td>
<td>68.55</td>
<td>602</td>
<td>84.31</td>
</tr>
<tr>
<td>Occupancy</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Owner-Occupied</td>
<td>620</td>
<td>92.40</td>
<td>682</td>
<td>95.52</td>
</tr>
<tr>
<td>Not Owner-Occupied</td>
<td>49</td>
<td>7.30</td>
<td>28</td>
<td>4.48</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>2</td>
<td>0.30</td>
<td>4</td>
<td>0.56</td>
</tr>
<tr>
<td>Lien Status</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>First Lien</td>
<td>670</td>
<td>99.85</td>
<td>711</td>
<td>99.58</td>
</tr>
<tr>
<td>Junior Lien</td>
<td>1</td>
<td>0.15</td>
<td>1</td>
<td>0.42</td>
</tr>
<tr>
<td>Not Lien Secured</td>
<td>0</td>
<td>0.00</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>0</td>
<td>0.00</td>
<td>2</td>
<td>0.28</td>
</tr>
<tr>
<td>Rate Spread</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Greater than 1.5% on First Lien</td>
<td>22</td>
<td>3.28</td>
<td>15</td>
<td>2.10</td>
</tr>
<tr>
<td>Greater than 3.5% on Second Lien</td>
<td>0</td>
<td>0.00</td>
<td>0</td>
<td>0.00</td>
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<tr>
<td>Not Applicable</td>
<td>649</td>
<td>96.72</td>
<td>699</td>
<td>97.90</td>
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</table>
Peer Analysis
CrossCheck began peer analysis by assessing Townstone’s market position and business model as well as determining the viability of the Counsel Peers. As the HMDA Loan Application Register (“LAR”) is the only comprehensive data source to assess mortgage lending performance, CrossCheck’s pool of peers was limited to HMDA LAR filers during the review period.

As noted in the Executive Summary identifying peers presented a challenge due to the Company’s non-delegated business model. Townstone did not underwrite loans during the Review Period, but rather acted as a non-delegated correspondent lender for investors. As such, the Company had a different business model than other companies that were required to submit a HMDA LAR for each year during the review period, as those other companies did underwrite and make the credit decision on their loans. As other mortgage brokers and non-delegated lenders generally do not report HMDA data, it was not possible using HMDA data, or other public data, to find any institutions who could be considered true peers in the market.

Given these limitations, it is CrossCheck’s assessment that there are no true peers within publicly available lending data available under HMDA or within the market. CrossCheck relied on lending product, average yearly production, and lending footprint to identify those companies that were closely situated to Townstone. In addition, analysis was completed on the Counsel Peers.

Peer Overview
Counsel Peers

The institutions listed below are potential peers identified by Legal Counsel.

<table>
<thead>
<tr>
<th>Counsel Peers</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Lender Name</strong></td>
</tr>
<tr>
<td>Peer 3</td>
</tr>
<tr>
<td>Peer 5</td>
</tr>
<tr>
<td>Peer 6</td>
</tr>
<tr>
<td>Peer 8</td>
</tr>
<tr>
<td>Peer 9</td>
</tr>
<tr>
<td>Peer 10</td>
</tr>
<tr>
<td>Peer 11</td>
</tr>
<tr>
<td>Peer 13</td>
</tr>
</tbody>
</table>

Additional Peers

As discussed earlier in this report, peer identification presented challenges based on the fact that true peer data is not publicly available. CrossCheck conducted a search for additional peers that was limited to independent mortgage companies with 50% to 200% of Townstone’s lending volume in Cook County, Illinois, for at least two of the three years included in the Review Period. High-priced lenders (those with a high-priced mortgage incident rate of greater than 15%) were excluded...
from consideration. To more accurately capture Townstone’s market position, the search focused on lenders with at least one physical location in the Greater Chicago area MSA and loan product mix of primarily conventional loans. The institutions listed below were considered the most similar to Townstone during the review period.

### Additional Peers

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Headquarters</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Peer 1</td>
<td>Lincolnshire, IL</td>
<td>12,171</td>
<td>11,973</td>
<td>8,604</td>
</tr>
<tr>
<td>Peer 2</td>
<td>Warrenville, IL</td>
<td>1,925</td>
<td>2,692</td>
<td>3,310</td>
</tr>
<tr>
<td>Peer 4</td>
<td>Gurnee, IL</td>
<td>3,224</td>
<td>5,081</td>
<td>5,355</td>
</tr>
<tr>
<td>Peer 7</td>
<td>Oak Brook, IL</td>
<td>1,832</td>
<td>3,761</td>
<td>6,426</td>
</tr>
<tr>
<td>Peer 12</td>
<td>Gilbert, AZ</td>
<td>728</td>
<td>1,257</td>
<td>1,599</td>
</tr>
</tbody>
</table>

### Overall Lending - Applications

The data in this section represents all HMDA reported records for the review period with no geographical restrictions. On average, the peers received 15.38% and 6.57% of their applications from 50% to less than 80% minority census tracts and 80% to 100% minority census tracts respectively. Over the same period, Townstone received 9.06% of their applications from 50% to less than 80% minority census tracts and 1.90% from 80% to 100% minority census tracts. While the percentage of Townstone’s applications from these majority minority market areas was less than that of their combined peers, they were not an outlier among their peers. The Company had a higher application percentage from 50% to less than 80% minority census tracts than six of the peers. For 80% to 100% minority census tracts, Townstone had a higher percentage of applications than two peers.

### All MSAs - 2014, 2015, 2016

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
<td>Applications</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>2262</td>
<td>205</td>
<td>9.06%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>32748</td>
<td>8229</td>
<td>25.13%</td>
</tr>
<tr>
<td>Peer 2</td>
<td>7927</td>
<td>679</td>
<td>8.57%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>1953</td>
<td>247</td>
<td>12.65%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>13660</td>
<td>1160</td>
<td>8.49%</td>
</tr>
<tr>
<td>Peer 5</td>
<td>34060</td>
<td>2460</td>
<td>7.22%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>1937</td>
<td>170</td>
<td>8.78%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>12019</td>
<td>2525</td>
<td>21.01%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>13071</td>
<td>737</td>
<td>5.64%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>3729</td>
<td>754</td>
<td>20.22%</td>
</tr>
<tr>
<td>Peer 10</td>
<td>35177</td>
<td>8037</td>
<td>22.85%</td>
</tr>
</tbody>
</table>
### All MSAs - 2014, 2015, 2016

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
<td>Applications</td>
</tr>
<tr>
<td>Peer 11</td>
<td>23532</td>
<td>2840</td>
<td>12.07%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>3584</td>
<td>465</td>
<td>12.97%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>1346</td>
<td>109</td>
<td>8.10%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>184743</td>
<td>28412</td>
<td>15.38%</td>
</tr>
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</table>

*Total Peers does not include Townstone Financial

### All MSAs - 2014

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
<td>Applications</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>671</td>
<td>70</td>
<td>10.43%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>12171</td>
<td>2907</td>
<td>23.88%</td>
</tr>
<tr>
<td>Peer 2</td>
<td>1925</td>
<td>158</td>
<td>8.21%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>565</td>
<td>90</td>
<td>15.93%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>3224</td>
<td>295</td>
<td>9.15%</td>
</tr>
<tr>
<td>Peer 5</td>
<td>5985</td>
<td>400</td>
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<tr>
<td>Peer 6</td>
<td>506</td>
<td>40</td>
<td>7.91%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>1832</td>
<td>481</td>
<td>26.26%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>4918</td>
<td>316</td>
<td>6.43%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>-</td>
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<td>-</td>
</tr>
<tr>
<td>Peer 10</td>
<td>6739</td>
<td>1852</td>
<td>27.48%</td>
</tr>
<tr>
<td>Peer 11</td>
<td>4356</td>
<td>557</td>
<td>12.79%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>728</td>
<td>92</td>
<td>12.64%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>322</td>
<td>23</td>
<td>7.14%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>43271</td>
<td>7211</td>
<td>16.66%</td>
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</table>

*Total Peers does not include Townstone Financial

### All MSAs - 2015

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
<td>Applications</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>714</td>
<td>57</td>
<td>7.98%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>11973</td>
<td>3000</td>
<td>25.06%</td>
</tr>
<tr>
<td>Peer 2</td>
<td>2692</td>
<td>228</td>
<td>8.47%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>670</td>
<td>76</td>
<td>11.34%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>5081</td>
<td>419</td>
<td>8.25%</td>
</tr>
</tbody>
</table>

Prepared for Legal Counsel by
CROSSCHECK COMPLIANCE LLC, 810 W. WASHINGTON BLVD., CHICAGO, IL 60607
### All MSAs - 2015

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
</tr>
<tr>
<td>Peer 5</td>
<td>12118</td>
<td>794</td>
<td>6.55%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>703</td>
<td>74</td>
<td>10.53%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>3761</td>
<td>848</td>
<td>22.55%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>3876</td>
<td>198</td>
<td>5.11%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>838</td>
<td>179</td>
<td>21.36%</td>
</tr>
<tr>
<td>Peer 10</td>
<td>13373</td>
<td>3086</td>
<td>23.08%</td>
</tr>
<tr>
<td>Peer 11</td>
<td>7188</td>
<td>838</td>
<td>11.66%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>1257</td>
<td>207</td>
<td>16.47%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>395</td>
<td>29</td>
<td>7.34%</td>
</tr>
<tr>
<td><strong>Total Peers</strong>*</td>
<td><strong>63925</strong></td>
<td><strong>9976</strong></td>
<td><strong>15.61%</strong></td>
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</tbody>
</table>

*Total Peers does not include Townstone Financial

### All MSAs - 2016

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
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</tr>
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<td>718</td>
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<td>15957</td>
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<td>2891</td>
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<td>1445</td>
<td>12.05%</td>
</tr>
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<td>1599</td>
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<td>629</td>
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<td>9.06%</td>
</tr>
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<td><strong>Total Peers</strong>*</td>
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<td><strong>14.48%</strong></td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

**Overall Lending - Loans**

The data in this section represents all HMDA reported originated transactions for the Review Period with no geographical restrictions. Townstone’s 8.65% of loans originating in 50% to less than 80% minority census tracts was lower than the combined peer’s 15.16% but was higher than five of
the peers identified. Within 80% to 100% minority census tracts, Townstone ranked higher than two of the peers at 1.55% of the Company’s total originations.

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
<tbody>
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<td></td>
<td></td>
<td>Loans</td>
<td>% of Loans</td>
</tr>
<tr>
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<td>1549</td>
<td>134</td>
<td>8.65%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>25131</td>
<td>6340</td>
<td>25.23%</td>
</tr>
<tr>
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<td>6852</td>
<td>563</td>
<td>8.22%</td>
</tr>
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<td>1030</td>
<td>105</td>
<td>10.19%</td>
</tr>
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<td>9881</td>
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<td>1795</td>
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<td>9358</td>
<td>2022</td>
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<td>10276</td>
<td>527</td>
<td>5.13%</td>
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<td>2540</td>
<td>502</td>
<td>19.76%</td>
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<td>Peer 10</td>
<td>28753</td>
<td>6460</td>
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<td>2014</td>
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<td>Peer 13</td>
<td>1346</td>
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</tr>
<tr>
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<td>21718</td>
<td>15.16%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

---

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Loans</td>
<td>% of Loans</td>
</tr>
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<td>Townstone Financial</td>
<td>502</td>
<td>54</td>
<td>10.76%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>8815</td>
<td>2119</td>
<td>24.04%</td>
</tr>
<tr>
<td>Peer 2</td>
<td>1624</td>
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<td>7.88%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>272</td>
<td>39</td>
<td>14.34%</td>
</tr>
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<td>Peer 4</td>
<td>2455</td>
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</tr>
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<td>Peer 5</td>
<td>4994</td>
<td>316</td>
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<td>202</td>
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</tr>
<tr>
<td>Peer 9</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Peer 10</td>
<td>5234</td>
<td>1404</td>
<td>26.82%</td>
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</table>
### All MSAs - 2014

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Loans</td>
<td>% of Loans</td>
</tr>
<tr>
<td>Peer 11</td>
<td>3364</td>
<td>413</td>
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</tr>
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<td>Peer 12</td>
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<td>65</td>
<td>12.38%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>322</td>
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<tr>
<td>Total Peers*</td>
<td>33288</td>
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<td>16.25%</td>
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</tbody>
</table>

*Total Peers does not include Townstone Financial

### All MSAs - 2015

<table>
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<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Loans</td>
<td>% of Loans</td>
</tr>
<tr>
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<td>6.97%</td>
</tr>
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</tr>
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<td>190</td>
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</tr>
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<td>8.24%</td>
</tr>
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</tr>
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</tr>
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<td>395</td>
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</tr>
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<td>49366</td>
<td>7675</td>
<td>15.55%</td>
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</tbody>
</table>

*Total Peers does not include Townstone Financial

### All MSAs - 2016

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<th>Total Loans</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
<tbody>
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<td>% of Loans</td>
</tr>
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</tr>
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<td>Peer 3</td>
<td>406</td>
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<td>9.11%</td>
</tr>
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<td>4291</td>
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<td>7.99%</td>
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<td>7.41%</td>
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All MSAs - 2016

<table>
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<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
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<td></td>
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</tr>
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<td>4529</td>
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<td>3471</td>
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<td>2126</td>
<td>413</td>
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</tr>
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<td>12705</td>
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<td>975</td>
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</tr>
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<td>629</td>
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<td>9.06%</td>
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<td>8635</td>
<td>14.25%</td>
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</tbody>
</table>

*Total Peers does not include Townstone Financial

Greater Chicago Area MSA - Applications

The data in this section represents all HMDA reported records for the Review Period within the Greater Chicago Area MSA. Townstone’s proportion of applications from substantial minority census tracts is higher than one of their peers. Within the South Chicago Majority African American Census Tracts, Townstone’s application percentage exceeded four of their peers.

Greater Chicago Area MSA - 2014, 2015, 2016

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
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<td>Applications</td>
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</tr>
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<td>245</td>
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<td>352</td>
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<td>6242</td>
<td>842</td>
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<td>1951</td>
<td>386</td>
<td>19.78%</td>
</tr>
<tr>
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<td>5495</td>
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<td>19.91%</td>
</tr>
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<td>1103</td>
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<td>16.77%</td>
</tr>
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<td>1698</td>
<td>211</td>
<td>12.43%</td>
</tr>
<tr>
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<td>2658</td>
<td>403</td>
<td>15.16%</td>
</tr>
<tr>
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<td>3797</td>
<td>578</td>
<td>15.22%</td>
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<td>1292</td>
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<td>18009</td>
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<td>15.18%</td>
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### Greater Chicago Area MSA - 2014, 2015, 2016

<table>
<thead>
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<th>Lender Name</th>
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<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>% of Applications</td>
<td>% of Applications</td>
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### Greater Chicago Area MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater Chicago Area MSA</td>
<td>2215</td>
<td>947</td>
<td>42.75%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

### Greater Chicago Area MSA - 2014

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>% of Applications</td>
<td>% of Applications</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>614</td>
<td>83</td>
<td>13.52%</td>
</tr>
<tr>
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<td>904</td>
<td>100</td>
<td>11.06%</td>
</tr>
<tr>
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</tr>
<tr>
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<td>564</td>
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<td>263</td>
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<td>59</td>
<td>17.30%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>1158</td>
<td>193</td>
<td>16.67%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
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</tr>
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<td>588</td>
<td>17.74%</td>
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<td>40</td>
<td>16.06%</td>
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<tr>
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<td>28</td>
<td>10.14%</td>
</tr>
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<td>16.49%</td>
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### Greater Chicago Area MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater Chicago Area MSA</td>
<td>2215</td>
<td>947</td>
<td>42.75%</td>
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</tbody>
</table>

*Total Peers does not include Townstone Financial*
### Greater Chicago Area MSA - 2015

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td>Applications</td>
<td>% of Applications</td>
</tr>
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<td>Townstone Financial</td>
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<td>71</td>
<td>10.64%</td>
</tr>
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<td>18.51%</td>
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<td>16.08%</td>
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<td>15.25%</td>
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<td>258</td>
<td>16.04%</td>
</tr>
<tr>
<td>Peer 11</td>
<td>5726</td>
<td>949</td>
<td>16.57%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>392</td>
<td>74</td>
<td>18.88%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>335</td>
<td>29</td>
<td>8.66%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>17849</td>
<td>3033</td>
<td>16.99%</td>
</tr>
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</table>

### Greater Chicago Area MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater Chicago Area MSA</td>
<td>2215</td>
<td>947</td>
<td>28.29%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

---

### Greater Chicago Area MSA - 2016

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>794</td>
<td>91</td>
<td>11.46%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>866</td>
<td>110</td>
<td>12.70%</td>
</tr>
<tr>
<td>Peer 2</td>
<td>2676</td>
<td>354</td>
<td>13.23%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>717</td>
<td>129</td>
<td>17.99%</td>
</tr>
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<td>Peer 4</td>
<td>2185</td>
<td>407</td>
<td>18.63%</td>
</tr>
<tr>
<td>Peer 5</td>
<td>699</td>
<td>130</td>
<td>18.60%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>660</td>
<td>68</td>
<td>10.30%</td>
</tr>
</tbody>
</table>
## Greater Chicago Area MSA - Applications

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
</tr>
<tr>
<td>Peer 7</td>
<td>1415</td>
<td>199</td>
<td>14.06%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>1472</td>
<td>207</td>
<td>14.06%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>2809</td>
<td>1003</td>
<td>35.71%</td>
</tr>
<tr>
<td>Peer 10</td>
<td>1336</td>
<td>161</td>
<td>12.05%</td>
</tr>
<tr>
<td>Peer 11</td>
<td>8969</td>
<td>1572</td>
<td>17.53%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>301</td>
<td>29</td>
<td>9.63%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>571</td>
<td>62</td>
<td>10.86%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>24676</td>
<td>4431</td>
<td>17.96%</td>
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</table>

## Greater Chicago Area MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater Chicago Area MSA</td>
<td>2215</td>
<td>947</td>
<td>42.75%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

## Greater Chicago Area MSA - Loans

The data in this section represents all HMDA reported originated transactions for the Review Period within the Greater Chicago Area MSA. All peers combined originated 15.56% and 1.23% of their loans in substantial minority census tracts and South Chicago Majority African American Census Tracts respectively. Townstone originated 10.83% and 0.56% of their loans from these census tracts, ranking above one and four peers respectively.

## Greater Chicago Area MSA - 2014, 2015, 2016

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Loans</td>
<td>% of Loans</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>1440</td>
<td>156</td>
<td>10.83%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>2292</td>
<td>270</td>
<td>11.78%</td>
</tr>
<tr>
<td>Peer 2</td>
<td>5458</td>
<td>672</td>
<td>12.31%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>1029</td>
<td>135</td>
<td>13.12%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>4170</td>
<td>745</td>
<td>17.87%</td>
</tr>
<tr>
<td>Peer 5</td>
<td>827</td>
<td>129</td>
<td>15.60%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>1454</td>
<td>158</td>
<td>10.87%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>2133</td>
<td>300</td>
<td>14.06%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>2893</td>
<td>419</td>
<td>14.48%</td>
</tr>
</tbody>
</table>

Prepared for Legal Counsel by
CROSSCHECK COMPLIANCE LLC, 810 W. WASHINGTON BLVD., CHICAGO, IL 60607
### Greater Chicago Area MSA - 2014, 2015, 2016

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Loans</td>
<td>% of Loans</td>
<td>Loans</td>
</tr>
<tr>
<td>Peer 9</td>
<td>2476</td>
<td>806</td>
<td>32.55%</td>
</tr>
<tr>
<td>Peer 10</td>
<td>2889</td>
<td>349</td>
<td>12.08%</td>
</tr>
<tr>
<td>Peer 11</td>
<td>13342</td>
<td>2146</td>
<td>16.08%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>746</td>
<td>116</td>
<td>15.55%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>1182</td>
<td>119</td>
<td>10.07%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>40891</td>
<td>6364</td>
<td>15.56%</td>
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</table>

### Greater Chicago Area MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Tract Count</td>
<td>% of Tracts</td>
<td></td>
</tr>
<tr>
<td>Greater Chicago Area MSA</td>
<td>2215</td>
<td>947</td>
<td>42.75%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

### Greater Chicago Area MSA - 2014

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Loans</td>
<td>% of Loans</td>
<td>Loans</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>463</td>
<td>62</td>
<td>13.39%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>693</td>
<td>67</td>
<td>9.67%</td>
</tr>
<tr>
<td>Peer 2</td>
<td>1218</td>
<td>165</td>
<td>13.55%</td>
</tr>
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<td>Peer 3</td>
<td>272</td>
<td>49</td>
<td>18.01%</td>
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<td>Peer 4</td>
<td>990</td>
<td>192</td>
<td>19.39%</td>
</tr>
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<td>Peer 5</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Peer 6</td>
<td>365</td>
<td>35</td>
<td>9.59%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>320</td>
<td>56</td>
<td>17.50%</td>
</tr>
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<td>Peer 8</td>
<td>841</td>
<td>124</td>
<td>14.74%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Peer 10</td>
<td>395</td>
<td>38</td>
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<td>443</td>
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<tr>
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<td>276</td>
<td>28</td>
<td>10.14%</td>
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<tr>
<td>Total Peers*</td>
<td>8210</td>
<td>1229</td>
<td>14.97%</td>
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### Greater Chicago Area MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater Chicago Area MSA</td>
<td>2215</td>
<td>947</td>
<td>42.75%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

### Greater Chicago Area MSA - 2015 Loans

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Loans</td>
<td>% of Loans</td>
<td>Loans</td>
</tr>
<tr>
<td>Townstone Financial</td>
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<td>9.11%</td>
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<td>906</td>
<td>113</td>
<td>12.47%</td>
</tr>
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<td>Peer 2</td>
<td>1836</td>
<td>221</td>
<td>12.04%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>352</td>
<td>37</td>
<td>10.51%</td>
</tr>
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<td>Peer 4</td>
<td>1428</td>
<td>250</td>
<td>17.51%</td>
</tr>
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<td>Peer 5</td>
<td>300</td>
<td>39</td>
<td>13.00%</td>
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<tr>
<td>Peer 6</td>
<td>498</td>
<td>67</td>
<td>13.45%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>772</td>
<td>116</td>
<td>15.03%</td>
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<td>Peer 8</td>
<td>896</td>
<td>134</td>
<td>14.96%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>401</td>
<td>123</td>
<td>30.67%</td>
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<tr>
<td>Peer 10</td>
<td>1344</td>
<td>200</td>
<td>14.88%</td>
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<td>Peer 11</td>
<td>4451</td>
<td>684</td>
<td>15.37%</td>
</tr>
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<td>302</td>
<td>58</td>
<td>19.21%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>335</td>
<td>29</td>
<td>8.66%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>13821</td>
<td>2071</td>
<td>14.98%</td>
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### Greater Chicago Area MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater Chicago Area MSA</td>
<td>2215</td>
<td>947</td>
<td>42.75%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial*
### Greater Chicago Area MSA - 2016

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Loans</td>
<td>% of Loans</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>439</td>
<td>45</td>
<td>10.25%</td>
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<tr>
<td>Peer 1</td>
<td>693</td>
<td>90</td>
<td>12.99%</td>
</tr>
<tr>
<td>Peer 2</td>
<td>2404</td>
<td>286</td>
<td>11.90%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>405</td>
<td>49</td>
<td>12.10%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>1752</td>
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</tr>
<tr>
<td>Peer 5</td>
<td>527</td>
<td>90</td>
<td>17.08%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>591</td>
<td>56</td>
<td>9.48%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>1041</td>
<td>128</td>
<td>12.30%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>1156</td>
<td>161</td>
<td>13.93%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>2075</td>
<td>683</td>
<td>32.92%</td>
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<tr>
<td>Peer 10</td>
<td>1150</td>
<td>111</td>
<td>9.65%</td>
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<tr>
<td>Peer 11</td>
<td>6253</td>
<td>1019</td>
<td>16.30%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>242</td>
<td>26</td>
<td>10.74%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>571</td>
<td>62</td>
<td>10.86%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>18860</td>
<td>3064</td>
<td>16.25%</td>
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### Greater Chicago Area MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Tract Count</td>
<td>% of Tracts</td>
</tr>
<tr>
<td>Greater Chicago Area MSA</td>
<td>2215</td>
<td>947</td>
<td>42.75%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

### Chicago-Joliet-Naperville, MSA - Applications

The data in this section represents all HMDA reported records for the Review Period within the Chicago-Joliet-Naperville, Illinois MSA. Townstone received 13.30% of their applications from substantial minority census tracts and 1.15% from South Chicago Majority African American Census Tracts, ranking above two and three of their peers respectively.


<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>1572</td>
<td>209</td>
<td>13.30%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>2383</td>
<td>330</td>
<td>13.85%</td>
</tr>
</tbody>
</table>

Prepared for Legal Counsel by
CROSSCHECK COMPLIANCE LLC, 810 W. WASHINGTON BLVD., CHICAGO, IL 60607

#### Applications

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
</tr>
<tr>
<td>Peer 2</td>
<td>5025</td>
<td>666</td>
<td>13.25%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>1790</td>
<td>357</td>
<td>19.94%</td>
</tr>
<tr>
<td>Peer 4</td>
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</tr>
<tr>
<td>Peer 5</td>
<td>965</td>
<td>173</td>
<td>17.93%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>47</td>
<td>15</td>
<td>31.91%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>2203</td>
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</tr>
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<td>Peer 8</td>
<td>3110</td>
<td>480</td>
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<tr>
<td>Peer 9</td>
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<td>1203</td>
<td>38.46%</td>
</tr>
<tr>
<td>Peer 10</td>
<td>2870</td>
<td>452</td>
<td>15.75%</td>
</tr>
<tr>
<td>Peer 11</td>
<td>15284</td>
<td>2874</td>
<td>18.80%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>793</td>
<td>124</td>
<td>15.64%</td>
</tr>
<tr>
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<td>1084</td>
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<tr>
<td>Total Peers*</td>
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<td>18.67%</td>
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#### Chicago-Joliet-Naperville MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Tract Count</td>
<td>% of Tracts</td>
</tr>
<tr>
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<td>808</td>
<td>45.94%</td>
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</tbody>
</table>

*Total Peers does not include Townstone Financial

### Chicago-Joliet-Naperville MSA - 2014

#### Applications

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
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<tr>
<td>Townstone Financial</td>
<td>478</td>
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<td>15.27%</td>
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<tr>
<td>Peer 1</td>
<td>738</td>
<td>95</td>
<td>12.87%</td>
</tr>
<tr>
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<td>10</td>
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<td>Peer 7</td>
<td>273</td>
<td>53</td>
<td>19.41%</td>
</tr>
</tbody>
</table>

**Prepared for Legal Counsel by**
CROSSCHECK COMPLIANCE LLC, 810 W. WASHINGTON BLVD., CHICAGO, IL 60607
## Chicago-Joliet-Naperville MSA - 2014

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
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<tbody>
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<td>% of Applications</td>
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## Chicago-Joliet-Naperville MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Tract Count</td>
<td>% of Tracts</td>
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<tr>
<td>Chicago-Joliet-Naperville MSA</td>
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<td>45.94%</td>
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</table>

*Total Peers does not include Townstone Financial

## Chicago-Joliet-Naperville MSA - 2015

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<th>Substantial Minority Census Tracts</th>
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<td>114</td>
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<td>50</td>
<td>14.20%</td>
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<td>4917</td>
<td>901</td>
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<td>18.89%</td>
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<tr>
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</tr>
<tr>
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<td>2407</td>
<td>18.16%</td>
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Chicago-Joliet-Naperville MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chicago-Joliet-Naperville MSA</td>
<td>1759</td>
<td>808</td>
<td>45.94%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

Chicago-Joliet-Naperville MSA - 2016

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
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</thead>
<tbody>
<tr>
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<td>% of Applications</td>
<td>Applications</td>
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<td>76</td>
<td>12.69%</td>
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<td>703</td>
<td>106</td>
<td>15.08%</td>
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<td>2170</td>
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<td>13.23%</td>
</tr>
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<td>Peer 3</td>
<td>660</td>
<td>122</td>
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</tr>
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<td>Peer 4</td>
<td>492</td>
<td>103</td>
<td>20.93%</td>
</tr>
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</tr>
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<td>7476</td>
<td>1432</td>
<td>19.15%</td>
</tr>
<tr>
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<td>266</td>
<td>28</td>
<td>10.53%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>534</td>
<td>61</td>
<td>11.42%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>18940</td>
<td>3718</td>
<td>19.63%</td>
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</table>

Chicago-Joliet-Naperville, MSA Loans

The data in this section represents all HMDA reported originated transactions for the review period within the Chicago-Joliet-Naperville, MSA. At 12.36% of originated transactions, Townstone ranked above two peers in lending to substantial minority census tracts. Within South Chicago majority African American census tracts, Townstone ranked above three peers and originated 0.73% of their loans from these census tracts.

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Loans % of Loans</td>
<td>Loans % of Loans</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>1100</td>
<td>136 12.36%</td>
<td>8 0.73%</td>
</tr>
<tr>
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<td>1867</td>
<td>252 13.50%</td>
<td>6 0.32%</td>
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<td>4373</td>
<td>529 12.10%</td>
<td>62 1.42%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>933</td>
<td>126 13.50%</td>
<td>22 2.36%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>662</td>
<td>144 21.75%</td>
<td>30 4.53%</td>
</tr>
<tr>
<td>Peer 5</td>
<td>730</td>
<td>123 16.85%</td>
<td>8 1.10%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>35</td>
<td>11 31.43%</td>
<td>3 8.57%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>1767</td>
<td>279 15.79%</td>
<td>26 1.47%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>2386</td>
<td>352 14.75%</td>
<td>29 1.22%</td>
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<tr>
<td>Peer 9</td>
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<td>754 34.91%</td>
<td>80 3.70%</td>
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<td>70 2.88%</td>
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<td>1993 17.54%</td>
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<td>2 0.32%</td>
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<td>2 0.18%</td>
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<tr>
<td>Total Peers*</td>
<td>30407</td>
<td>5111 16.81%</td>
<td>504 1.66%</td>
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### Chicago-Joliet-Naperville MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Tract Count</td>
<td>% of Tracts</td>
</tr>
<tr>
<td>Chicago-Joliet-Naperville MSA</td>
<td>1759</td>
<td>808 45.94%</td>
<td>30.75%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

---

### Chicago-Joliet-Naperville MSA - 2014

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td>Loans % of Loans</td>
<td>Loans % of Loans</td>
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<td>1 0.18%</td>
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<tr>
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<td>137 13.87%</td>
<td>15 1.52%</td>
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<tr>
<td>Peer 3</td>
<td>248</td>
<td>47 18.95%</td>
<td>8 3.23%</td>
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<tr>
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<td>111</td>
<td>30 27.03%</td>
<td>3 2.70%</td>
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<td>7 46.67%</td>
<td>2 13.33%</td>
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## Chicago-Joliet-Naperville MSA - 2014

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
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<td>% of Loans</td>
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<td>681</td>
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<td>-</td>
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<td>Peer 12</td>
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<td>27</td>
<td>16.46%</td>
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<tr>
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<tr>
<td>Total Peers*</td>
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## Chicago-Joliet-Naperville MSA - Market Demographics

<table>
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<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
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<tbody>
<tr>
<td>Chicago-Joliet-Naperville MSA</td>
<td>1759</td>
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*Total Peers does not include Townstone Financial

## Chicago-Joliet-Naperville MSA - 2015

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<td>14.34%</td>
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<td>16.96%</td>
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<tr>
<td>Total Peers*</td>
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### Chicago-Joliet-Naperville MSA - Market Demographics

<table>
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<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chicago-Joliet-Naperville MSA</td>
<td>1759</td>
<td>808</td>
<td>45.94%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial*

### Chicago-Joliet-Naperville MSA - 2016

<table>
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<th>Lender Name</th>
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<th>South Chicago Majority African American Census Tracts</th>
</tr>
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<td></td>
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<td>Loans</td>
</tr>
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<td>Townstone Financial</td>
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<td>3</td>
</tr>
<tr>
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<td>566</td>
<td>88</td>
<td>2</td>
</tr>
<tr>
<td>Peer 2</td>
<td>1939</td>
<td>231</td>
<td>27</td>
</tr>
<tr>
<td>Peer 3</td>
<td>363</td>
<td>46</td>
<td>10</td>
</tr>
<tr>
<td>Peer 4</td>
<td>349</td>
<td>64</td>
<td>14</td>
</tr>
<tr>
<td>Peer 5</td>
<td>463</td>
<td>85</td>
<td>7</td>
</tr>
<tr>
<td>Peer 6</td>
<td>12</td>
<td>2</td>
<td>1</td>
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<tr>
<td>Peer 7</td>
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<td>73</td>
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<td>107</td>
<td>12</td>
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<tr>
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<td>5242</td>
<td>937</td>
<td>81</td>
</tr>
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<td>Peer 12</td>
<td>214</td>
<td>25</td>
<td>0</td>
</tr>
<tr>
<td>Peer 13</td>
<td>534</td>
<td>61</td>
<td>0</td>
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<tr>
<td>Total Peers*</td>
<td>14291</td>
<td>2543</td>
<td>250</td>
</tr>
</tbody>
</table>

### Cook County, Illinois - Applications

The data in this section represents all HMDA reported records for the Review Period within Cook County, Illinois. Townstone had a higher percentage of applications from substantial minority census tracts than three of their peers. With 1.97% of their applications from South Chicago Majority African American Census Tracts, Townstone was higher than four of their peers.
### Cook County - 2014, 2015, 2016

#### Applications

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>916</td>
<td>170</td>
<td>18.56%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>1575</td>
<td>266</td>
<td>16.89%</td>
</tr>
<tr>
<td>Peer 2</td>
<td>1305</td>
<td>409</td>
<td>31.34%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>1133</td>
<td>285</td>
<td>25.15%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>591</td>
<td>207</td>
<td>35.03%</td>
</tr>
<tr>
<td>Peer 5</td>
<td>805</td>
<td>162</td>
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<td>759</td>
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#### Cook County - Market Demographics

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<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
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<tr>
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<td>Tract Count</td>
<td>% of Tracts</td>
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<td>740</td>
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*Total Peers does not include Townstone Financial

### Cook County - 2014

#### Applications

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### Cook County - 2014

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<td>-</td>
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<td>0</td>
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<tr>
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<td>166</td>
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### Cook County - Market Demographics

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<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
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<tbody>
<tr>
<td>Cook County</td>
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<td>740</td>
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</table>

*Total Peers does not include Townstone Financial

### Cook County - 2015

<table>
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<th>Substantial Minority Census Tracts</th>
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</tr>
</thead>
<tbody>
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<td>47</td>
<td>4</td>
</tr>
<tr>
<td>Peer 1</td>
<td>622</td>
<td>103</td>
<td>3</td>
</tr>
<tr>
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<td>455</td>
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<td>25</td>
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<td>Peer 3</td>
<td>392</td>
<td>90</td>
<td>23</td>
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<tr>
<td>Peer 4</td>
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<td>89</td>
<td>33</td>
</tr>
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<td>3</td>
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<tr>
<td>Peer 6</td>
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<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Peer 7</td>
<td>370</td>
<td>99</td>
<td>13</td>
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<tr>
<td>Peer 8</td>
<td>392</td>
<td>101</td>
<td>15</td>
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<td>Peer 9</td>
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<td>29</td>
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<td>Peer 10</td>
<td>992</td>
<td>222</td>
<td>76</td>
</tr>
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<td>Peer 11</td>
<td>3863</td>
<td>829</td>
<td>82</td>
</tr>
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<td>Peer 12</td>
<td>206</td>
<td>48</td>
<td>2</td>
</tr>
<tr>
<td>Peer 13</td>
<td>207</td>
<td>23</td>
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<tr>
<td>Total Peers*</td>
<td>8442</td>
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<td>304</td>
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"Prepared for Legal Counsel by CROSSCHECK COMPLIANCE LLC, 810 W. WASHINGTON BLVD., CHICAGO, IL 60607"
### Cook County - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Tract Count</td>
<td>% of Tracts</td>
<td></td>
</tr>
<tr>
<td>Cook County</td>
<td>1319</td>
<td>740</td>
<td>56.10%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

### Cook County - 2016

#### Applications

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
<td>Applications</td>
</tr>
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<td>317</td>
<td>59</td>
<td>18.61%</td>
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<tr>
<td>Peer 1</td>
<td>461</td>
<td>83</td>
<td>18.00%</td>
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<tr>
<td>Peer 2</td>
<td>548</td>
<td>169</td>
<td>30.84%</td>
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<td>Peer 3</td>
<td>412</td>
<td>98</td>
<td>23.79%</td>
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<td>277</td>
<td>81</td>
<td>29.24%</td>
</tr>
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<td>510</td>
<td>116</td>
<td>22.75%</td>
</tr>
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<td>Peer 6</td>
<td>11</td>
<td>2</td>
<td>18.18%</td>
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<td>675</td>
<td>150</td>
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<td>Peer 8</td>
<td>535</td>
<td>135</td>
<td>25.23%</td>
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<td>1602</td>
<td>784</td>
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<td>863</td>
<td>142</td>
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<td>Peer 11</td>
<td>5542</td>
<td>1304</td>
<td>23.53%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>172</td>
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</tr>
<tr>
<td>Peer 13</td>
<td>386</td>
<td>57</td>
<td>14.77%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>11994</td>
<td>3139</td>
<td>26.17%</td>
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</table>

### Cook County, Illinois - Loans

The data in this section represents all HMDA reported originated transactions for the Review Period within Cook County, Illinois. Three peers originated a lower percentage of their loans from substantial minority census tracts than Townstone at 16.92%. Within South Chicago Majority African American Census Tracts, Townstone’s 1.23% of originations ranked above three of their peers.
### Cook County - 2014, 2015, 2016

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Loans</td>
<td>% of Loans</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>110</td>
<td>16.92%</td>
<td>8</td>
</tr>
<tr>
<td>Peer 1</td>
<td>202</td>
<td>16.63%</td>
<td>6</td>
</tr>
<tr>
<td>Peer 2</td>
<td>316</td>
<td>29.10%</td>
<td>62</td>
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<tr>
<td>Peer 3</td>
<td>97</td>
<td>17.23%</td>
<td>22</td>
</tr>
<tr>
<td>Peer 4</td>
<td>123</td>
<td>31.62%</td>
<td>30</td>
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<tr>
<td>Peer 5</td>
<td>118</td>
<td>19.38%</td>
<td>8</td>
</tr>
<tr>
<td>Peer 6</td>
<td>11</td>
<td>42.31%</td>
<td>3</td>
</tr>
<tr>
<td>Peer 7</td>
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<td>Peer 8</td>
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<td>25.94%</td>
<td>29</td>
</tr>
<tr>
<td>Peer 9</td>
<td>610</td>
<td>44.85%</td>
<td>80</td>
</tr>
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<td>290</td>
<td>16.47%</td>
<td>70</td>
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<td>1831</td>
<td>20.67%</td>
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<td>Peer 12</td>
<td>68</td>
<td>18.48%</td>
<td>2</td>
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<tr>
<td>Peer 13</td>
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<td>13.57%</td>
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<td>Total Peers*</td>
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### Cook County - Market Demographics

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<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total Tract Count</td>
<td>% of Tracts</td>
<td></td>
</tr>
<tr>
<td>Cook County</td>
<td>1319</td>
<td>740</td>
<td>56.10%</td>
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</table>

*Total Peers does not include Townstone Financial

### Cook County - 2014

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
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<tbody>
<tr>
<td></td>
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<td>Loans</td>
<td>% of Loans</td>
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<td>20.98%</td>
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<td>52</td>
<td>14.44%</td>
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<td>Peer 3</td>
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<td>21.66%</td>
<td>8</td>
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<td>38.89%</td>
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<td>63.64%</td>
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<td>74</td>
<td>27.92%</td>
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## Cook County - 2014

### Loans

<table>
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<td>-</td>
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<td>Peer 10</td>
<td>211</td>
<td>24 (11.37%)</td>
<td>1 (0.47%)</td>
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<tr>
<td>Peer 11</td>
<td>1956</td>
<td>386 (19.73%)</td>
<td>29 (1.48%)</td>
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<td>Peer 12</td>
<td>81</td>
<td>16 (19.75%)</td>
<td>0 (0.00%)</td>
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<tr>
<td>Peer 13</td>
<td>166</td>
<td>23 (13.86%)</td>
<td>2 (1.20%)</td>
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<tr>
<td>Total Peers*</td>
<td>3672</td>
<td>775 (21.11%)</td>
<td>77 (2.10%)</td>
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## Cook County - Market Demographics

### Total Census Tracts

- **Cook County**: 1319, Substantial Minority Census Tracts: 740, % of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts: 56.10%, Total Tracts: 740, % of Tracts: 40.66%

*Total Peers does not include Townstone Financial*
## Cook County - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
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<tbody>
<tr>
<td>Cook County</td>
<td>1319</td>
<td>740</td>
<td>40.66%</td>
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</table>

*Total Peers does not include Townstone Financial

## Cook County - 2016

<table>
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<td>Loans</td>
<td>Loans</td>
</tr>
<tr>
<td></td>
<td></td>
<td>% of Loans</td>
<td>% of Loans</td>
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<td>92</td>
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<td>402</td>
<td>101</td>
<td>10</td>
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<td>17</td>
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</tr>
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## Cook County - Market Demographics

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<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cook County</td>
<td>1319</td>
<td>740</td>
<td>40.66%</td>
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</tbody>
</table>

*Total Peers does not include Townstone Financial
# Appendix A

## South Chicago Majority African American Census Tracts

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>MSA/MD</th>
<th>State Code</th>
<th>County Code</th>
<th>Minority Population (%)</th>
<th>African American Population (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>3406.00</td>
<td>16974</td>
<td>17</td>
<td>031</td>
<td>99.89</td>
<td>99.12</td>
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<td>3501.00</td>
<td>16974</td>
<td>17</td>
<td>031</td>
<td>93.47</td>
<td>53.92</td>
</tr>
<tr>
<td>3504.00</td>
<td>16974</td>
<td>17</td>
<td>031</td>
<td>100</td>
<td>95.89</td>
</tr>
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<td>3510.00</td>
<td>16974</td>
<td>17</td>
<td>031</td>
<td>95.81</td>
<td>73.19</td>
</tr>
<tr>
<td>3511.00</td>
<td>16974</td>
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<td>031</td>
<td>99.18</td>
<td>96.12</td>
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<td>97.98</td>
<td>94.36</td>
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<td>77.25</td>
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<td>031</td>
<td>99.45</td>
<td>96.33</td>
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CROSSCHECK COMPLIANCE LLC, 810 W. WASHINGTON BLVD., CHICAGO, IL 60607
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<td>96.34</td>
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<td>031</td>
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<tr>
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<td>95.78</td>
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<td>16974</td>
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<td>031</td>
<td>99.42</td>
<td>90.74</td>
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</tbody>
</table>
# South Chicago Majority African American Census Tracts

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>MSA/MD</th>
<th>State Code</th>
<th>County Code</th>
<th>Minority Population (%)</th>
<th>African American Population (%)</th>
</tr>
</thead>
<tbody>
<tr>
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<td>95.14</td>
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<td>031</td>
<td>97.57</td>
<td>93.98</td>
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<tr>
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<td>16974</td>
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<td>95.12</td>
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<td>65.22</td>
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<td>97.05</td>
<td>92.35</td>
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<td>96.21</td>
<td>90.57</td>
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<td>77.5</td>
<td>50.65</td>
</tr>
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<td>16974</td>
<td>17</td>
<td>031</td>
<td>98.72</td>
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<td>8424.00</td>
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<td>99.33</td>
<td>96.58</td>
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<td>031</td>
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<td>16974</td>
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<td>031</td>
<td>98.08</td>
<td>94.01</td>
</tr>
<tr>
<td>8438.00</td>
<td>16974</td>
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<td>031</td>
<td>76.97</td>
<td>52.32</td>
</tr>
<tr>
<td>8439.00</td>
<td>16974</td>
<td>17</td>
<td>031</td>
<td>96.63</td>
<td>91.88</td>
</tr>
</tbody>
</table>

********************
2017 Appendix

Engagement Objective and Scope
At the direction of Legal Counsel in accordance with their joint defense and common interests, CrossCheck also completed a review primarily focused on lending to majority minority census tracts within the Chicago MSA for the 2017 lending period. At Legal Counsel’s instruction, CrossCheck conducted a peer analysis using 2017 HMDA data and the same peers previously identified by Legal Counsel and the additional peers identified by CrossCheck for the 2014 through 2016 period.

Peer 1 did not have publicly available HMDA data in 2017.

Executive Summary
Peer analysis results indicated that Townstone was not an outlier, having applications/origination percentages within the ranges of the identified peers for both Substantial Minority areas and South Chicago Majority African American Census Tracts.

Peer Analysis
Overall Lending - Applications
The data in this section represents all HMDA reported records for the review period with no geographical restrictions. Within 50% to less than 80% Minority Census Tracts, Townstone’s 11.29% of applications ranked higher than four of their peers. At 2.57% of applications, Townstone ranked higher than two of their peers within 80% to 100% Minority Census Tracts.

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>50% to less than 80% Minority Census Tracts</th>
<th>80% to 100% Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
<td>Applications</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>700</td>
<td>79</td>
<td>11.29%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Peer 2</td>
<td>2905</td>
<td>400</td>
<td>13.77%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>477</td>
<td>57</td>
<td>11.95%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>5614</td>
<td>629</td>
<td>11.20%</td>
</tr>
<tr>
<td>Peer 5</td>
<td>14216</td>
<td>1390</td>
<td>9.78%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>593</td>
<td>60</td>
<td>10.12%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>5635</td>
<td>1139</td>
<td>20.21%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>3576</td>
<td>204</td>
<td>5.70%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>2242</td>
<td>496</td>
<td>22.12%</td>
</tr>
<tr>
<td>Peer 10</td>
<td>11422</td>
<td>2559</td>
<td>22.40%</td>
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<tr>
<td>Peer 11</td>
<td>11269</td>
<td>1586</td>
<td>14.07%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>1524</td>
<td>201</td>
<td>13.19%</td>
</tr>
</tbody>
</table>

Prepared for Legal Counsel by
CROSSCHECK COMPLIANCE LLC, 810 W. WASHINGTON BLVD., CHICAGO, IL 60607
Overall Lending - Loans

The data in this section represents all HMDA reported originated transactions for the Review Period with no geographical restrictions. Townstone’s 11.40% of loans from 50% to less than 80% Minority Census tracts ranked higher than four of their peers. Within 80% to 100% Minority Census Tracts, Townstone ranked higher than two of their peers with 2.33% come from these census tracts.

<table>
<thead>
<tr>
<th>All MSAs - 2017</th>
<th>Loans</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lender Name</td>
<td>Total Loans</td>
</tr>
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<td></td>
<td></td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>386</td>
</tr>
<tr>
<td>Peer 1</td>
<td>-</td>
</tr>
<tr>
<td>Peer 2</td>
<td>2469</td>
</tr>
<tr>
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<td>329</td>
</tr>
<tr>
<td>Peer 4</td>
<td>4307</td>
</tr>
<tr>
<td>Peer 5</td>
<td>11018</td>
</tr>
<tr>
<td>Peer 6</td>
<td>472</td>
</tr>
<tr>
<td>Peer 7</td>
<td>3990</td>
</tr>
<tr>
<td>Peer 8</td>
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<td>Peer 9</td>
<td>1568</td>
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<tr>
<td>Peer 10</td>
<td>9322</td>
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<td>Peer 11</td>
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<tr>
<td>Peer 12</td>
<td>1003</td>
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<tr>
<td>Peer 13</td>
<td>489</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>45276</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial
**Greater Chicago Area MSA - Applications**

The data in this section represents all HMDA reported records for the Review Period within the Greater Chicago Area MSA. Townstone’s 632 applications from this MSA represents 0.16% of all reported HMDA applications for 2017. Townstone had a higher percentage (15.35%) of applications from substantial minority census tracts than two peers. At 1.27% of all applications from the Greater Chicago Area, Townstone ranked higher than four of its peers.

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>632</td>
<td>97</td>
<td>15.35%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Peer 2</td>
<td>2438</td>
<td>474</td>
<td>19.44%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>477</td>
<td>88</td>
<td>18.45%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>2228</td>
<td>517</td>
<td>23.20%</td>
</tr>
<tr>
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<td>544</td>
<td>112</td>
<td>20.59%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>520</td>
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<td>13.85%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>1071</td>
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<td>20.35%</td>
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<tr>
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<td>Peer 9</td>
<td>2175</td>
<td>858</td>
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<tr>
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<td>133</td>
<td>17.05%</td>
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<tr>
<td>Peer 11</td>
<td>1175</td>
<td>1575</td>
<td>22.07%</td>
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<tr>
<td>Peer 12</td>
<td>192</td>
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<td>10.94%</td>
</tr>
<tr>
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<td>588</td>
<td>127</td>
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<tr>
<td>Total Peers*</td>
<td>19301</td>
<td>4414</td>
<td>22.87%</td>
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**Greater Chicago Area MSA - Market Demographics**

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<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Tract Count</td>
<td>% of Tracts</td>
</tr>
<tr>
<td>Greater Chicago Area MSA</td>
<td>2215</td>
<td>947</td>
<td>42.75%</td>
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</table>

*Total Peers does not include Townstone Financial
**Greater Chicago Area MSA - Loans**

The data in this section represents all HMDA reported originated transactions for the Review Period within the Greater Chicago Area MSA. Townstone, at 14.64% loans, ranked higher than two peers within Substantial Minority Census Tracts. For South Chicago Majority African American Census Tracts, Townstone ranked higher than five of their peers at 1.10% of loans.

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Loans</td>
<td>% of Loans</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>362</td>
<td>53</td>
<td>14.64%</td>
</tr>
<tr>
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<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
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<td>2105</td>
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</tr>
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<td>1719</td>
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<td>22.11%</td>
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<td>20.05%</td>
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<tr>
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<td>16.30%</td>
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<td>1522</td>
<td>578</td>
<td>37.98%</td>
</tr>
<tr>
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<td>667</td>
<td>106</td>
<td>15.89%</td>
</tr>
<tr>
<td>Peer 11</td>
<td>4646</td>
<td>948</td>
<td>20.40%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>149</td>
<td>16</td>
<td>10.74%</td>
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<tr>
<td>Peer 13</td>
<td>459</td>
<td>94</td>
<td>20.48%</td>
</tr>
<tr>
<td><strong>Total Peers</strong>*</td>
<td>14125</td>
<td>2965</td>
<td>20.99%</td>
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<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater Chicago Area MSA</td>
<td>2215</td>
<td>947</td>
<td>42.75%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial
Chicago-Joliet-Naperville, MSA - Applications

The data in this section represents all HMDA reported records for the Review Period within the Chicago-Joliet-Naperville, Illinois MSA. One peer had a lower percentage of applications from Substantial Minority Census Tracts and four peers had a lower percentage of applications from South Chicago Majority African American Census Tracts.

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
</tr>
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<td>480</td>
<td>84</td>
<td>17.50%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Peer 2</td>
<td>1953</td>
<td>409</td>
<td>20.94%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>432</td>
<td>83</td>
<td>19.21%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>547</td>
<td>166</td>
<td>30.35%</td>
</tr>
<tr>
<td>Peer 5</td>
<td>451</td>
<td>105</td>
<td>23.28%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>11</td>
<td>4</td>
<td>36.36%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>902</td>
<td>198</td>
<td>21.95%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>925</td>
<td>194</td>
<td>20.97%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>1912</td>
<td>802</td>
<td>41.95%</td>
</tr>
<tr>
<td>Peer 10</td>
<td>643</td>
<td>121</td>
<td>18.82%</td>
</tr>
<tr>
<td>Peer 11</td>
<td>5985</td>
<td>1475</td>
<td>24.64%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>176</td>
<td>20</td>
<td>11.36%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>541</td>
<td>125</td>
<td>23.11%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>14478</td>
<td>3702</td>
<td>25.57%</td>
</tr>
</tbody>
</table>

Chicago-Joliet-Naperville MSA - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chicago-Joliet-Naperville MSA</td>
<td>1759</td>
<td>808</td>
<td>45.94%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial
Chicago-Joliet-Naperville, MSA Loans

The data in this section represents all HMDA reported originated transactions for the review period within the Chicago-Joliet-Naperville, MSA. Townstone’s percent of loans from Substantial Minority Census Tracts and South Chicago Majority African American Census Tracts ranked higher than three and six of their peers respectively. Within South Chicago Majority African American Census Tracts, an additional peer was tied with Townstone at 1.47%.

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Loans % of Loans</td>
<td>Loans % of Loans</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>273</td>
<td>47 17.22%</td>
<td>4 1.47%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Peer 2</td>
<td>1673</td>
<td>316 18.89%</td>
<td>26 1.55%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>291</td>
<td>45 15.46%</td>
<td>6 2.06%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>373</td>
<td>110 29.49%</td>
<td>22 5.90%</td>
</tr>
<tr>
<td>Peer 5</td>
<td>341</td>
<td>77 22.58%</td>
<td>5 1.47%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>7</td>
<td>1 14.29%</td>
<td>0 0.00%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>668</td>
<td>127 19.01%</td>
<td>9 1.35%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>679</td>
<td>120 17.67%</td>
<td>4 0.59%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>1324</td>
<td>537 40.56%</td>
<td>69 5.21%</td>
</tr>
<tr>
<td>Peer 10</td>
<td>550</td>
<td>96 17.45%</td>
<td>5 0.91%</td>
</tr>
<tr>
<td>Peer 11</td>
<td>3935</td>
<td>894 22.72%</td>
<td>97 2.47%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>137</td>
<td>15 10.95%</td>
<td>0 0.00%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>422</td>
<td>92 21.80%</td>
<td>3 0.71%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>10400</td>
<td>2430 23.37%</td>
<td>246 2.37%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chicago-Joliet-Naperville MSA</td>
<td>1759</td>
<td>808 45.94%</td>
<td>30.75%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial
Cook County, Illinois - Applications

The data in this section represents all HMDA reported records for the Review Period within Cook County, Illinois. With 25.39% of its Cook County applications coming from Substantial Minority Census Tracts, Townstone ranked higher than three of its peers. Within South Chicago Majority African American Census Tracts, five peers were lower than Townstone’s 3.13%.

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Applications</th>
<th>Substantial Minority Census Tracts</th>
<th>South Chicago Majority African American Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applications</td>
<td>% of Applications</td>
<td>Applications</td>
</tr>
<tr>
<td>Townstone Financial</td>
<td>256</td>
<td>65</td>
<td>8</td>
</tr>
<tr>
<td>Peer 1</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Peer 2</td>
<td>654</td>
<td>241</td>
<td>42</td>
</tr>
<tr>
<td>Peer 3</td>
<td>249</td>
<td>62</td>
<td>21</td>
</tr>
<tr>
<td>Peer 4</td>
<td>303</td>
<td>141</td>
<td>39</td>
</tr>
<tr>
<td>Peer 5</td>
<td>354</td>
<td>97</td>
<td>11</td>
</tr>
<tr>
<td>Peer 6</td>
<td>9</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>Peer 7</td>
<td>507</td>
<td>149</td>
<td>22</td>
</tr>
<tr>
<td>Peer 8</td>
<td>455</td>
<td>150</td>
<td>16</td>
</tr>
<tr>
<td>Peer 9</td>
<td>1207</td>
<td>636</td>
<td>110</td>
</tr>
<tr>
<td>Peer 10</td>
<td>450</td>
<td>99</td>
<td>6</td>
</tr>
<tr>
<td>Peer 11</td>
<td>4390</td>
<td>1314</td>
<td>200</td>
</tr>
<tr>
<td>Peer 12</td>
<td>126</td>
<td>15</td>
<td>0</td>
</tr>
<tr>
<td>Peer 13</td>
<td>398</td>
<td>108</td>
<td>5</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>9102</td>
<td>3016</td>
<td>472</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Tract Count</td>
<td>% of Tracts</td>
</tr>
<tr>
<td>Cook County</td>
<td>1319</td>
<td>740</td>
<td>56.10%</td>
</tr>
</tbody>
</table>

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CROSSCHECK COMPLIANCE LLC, 810 W. WASHINGTON BLVD., CHICAGO, IL 60607
Cook County, Illinois - Loans

The data in this section represents all HMDA reported originated transactions for the Review Period within Cook County, Illinois. As a percent of loans for Substantial Minority Census Tracts, Townstone’s 24.31% ranked higher than four of their peers. Within South Chicago Majority African American Census Tracts, Townstone’s percentage of lending (2.78%) was higher than seven of their peers.

### Cook County - 2017

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Total Loans</th>
<th>Substantial Minority Census Tracts Loans</th>
<th>% of Loans</th>
<th>South Chicago Majority African American Census Tracts Loans</th>
<th>% of Loans</th>
</tr>
</thead>
<tbody>
<tr>
<td>Townstone Financial</td>
<td>144</td>
<td>35</td>
<td>24.31%</td>
<td>4</td>
<td>2.78%</td>
</tr>
<tr>
<td>Peer 1</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Peer 2</td>
<td>530</td>
<td>180</td>
<td>33.96%</td>
<td>26</td>
<td>4.91%</td>
</tr>
<tr>
<td>Peer 3</td>
<td>158</td>
<td>32</td>
<td>20.25%</td>
<td>6</td>
<td>3.80%</td>
</tr>
<tr>
<td>Peer 4</td>
<td>203</td>
<td>93</td>
<td>45.81%</td>
<td>22</td>
<td>10.84%</td>
</tr>
<tr>
<td>Peer 5</td>
<td>269</td>
<td>70</td>
<td>26.02%</td>
<td>5</td>
<td>1.86%</td>
</tr>
<tr>
<td>Peer 6</td>
<td>5</td>
<td>1</td>
<td>20.00%</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td>Peer 7</td>
<td>373</td>
<td>93</td>
<td>24.93%</td>
<td>9</td>
<td>2.41%</td>
</tr>
<tr>
<td>Peer 8</td>
<td>317</td>
<td>92</td>
<td>29.02%</td>
<td>4</td>
<td>1.26%</td>
</tr>
<tr>
<td>Peer 9</td>
<td>840</td>
<td>429</td>
<td>51.07%</td>
<td>69</td>
<td>8.21%</td>
</tr>
<tr>
<td>Peer 10</td>
<td>380</td>
<td>80</td>
<td>21.05%</td>
<td>5</td>
<td>1.32%</td>
</tr>
<tr>
<td>Peer 11</td>
<td>2906</td>
<td>796</td>
<td>27.39%</td>
<td>97</td>
<td>3.34%</td>
</tr>
<tr>
<td>Peer 12</td>
<td>98</td>
<td>11</td>
<td>11.22%</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td>Peer 13</td>
<td>305</td>
<td>77</td>
<td>25.25%</td>
<td>3</td>
<td>0.98%</td>
</tr>
<tr>
<td>Total Peers*</td>
<td>6384</td>
<td>1954</td>
<td>30.61%</td>
<td>246</td>
<td>3.85%</td>
</tr>
</tbody>
</table>

### Cook County - Market Demographics

<table>
<thead>
<tr>
<th>Market Area</th>
<th>Total Census Tracts</th>
<th>Substantial Minority Census Tracts</th>
<th>% of Total Owner-occupied Housing Located in Substantial Minority Census Tracts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cook County</td>
<td>1319</td>
<td>740</td>
<td>40.66%</td>
</tr>
</tbody>
</table>

*Total Peers does not include Townstone Financial

*--------------------*

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CROSSCHECK COMPLIANCE LLC, 810 W. WASHINGTON BLVD., CHICAGO, IL 60607