

Fair Lending Peer Review
Townstone Financial, Inc.
HMDA DATA 2014-2016
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CrossCheckCompliance



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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

Greater Chicago Area MSA – The combined Chicago-Joliet-Naperville, Illinois MSA (16974), Lake-Kenosha, Illinois MSA (29404), Elgin, Illinois MSA (20994), and the Gary, Indiana MSA (23844).

Chicago -Joliet-Naperville MSA – The Chicago-Joliet-Naperville, Illinois MSA (16974).

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.

Review Period – The entirety of 2014, 2015, and 2016.

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								
Year	2014		2015		2016		Total	
Loan Type	#	%	#	%	#	%	#	%
Conventional	569	84.80	598	83.75	793	90.42	1,960	86.65
FHA	91	13.56	101	14.15	67	7.64	259	11.45
VA	11	1.64	15	2.10	17	1.94	43	1.90
FSA/RHS	0	0.00	0	0.00	0	0.00	0	0.00
Property Type	#	%	#	%	#	%	#	%
One to Four Family	671	100.00	714	100.00	875	99.77	2,260	99.91
Manufactured Housing	0	0.00	0	0.00	1	0.11	1	0.04
Multifamily	0	0.00	0	0.00	1	0.11	1	0.04
Loan Purpose	#	%	#	%	#	%	#	%
Home Purchase	211	31.45	112	15.69	133	15.17	456	20.16
Home Improvement	0	0.00	0	0.00	1	0.11	1	0.04
Refinancing	460	68.55	602	84.31	743	84.72	1,805	79.80
Occupancy	#	%	#	%	#	%	#	%
Owner-Occupied	620	92.40	682	95.52	825	94.07	2,127	94.03
Not Owner-Occupied	49	7.30	28	3.92	37	4.22	114	5.04
Not Applicable	2	0.30	4	0.56	15	1.71	21	0.93
Lien Status	#	%	#	%	#	%	#	%
First Lien	670	99.85	711	99.58	876	99.89	2,257	99.78
Junior Lien	1	0.15	1	0.14	0	0.00	2	0.09
Not Lien Secured	0	0.00	0	0.00	0	0.00	0	0.00
Not Applicable	0	0.00	2	0.28	1	0.11	3	0.13
Rate Spread	#	%	#	%	#	%	#	%
Greater than 1.5% on First Lien	22	3.28	15	2.10	3	0.34	40	1.77
Greater than 3.5% on Second Lien	0	0.00	0	0.00	0	0.00	0	0.00
Not Applicable	649	96.72	699	97.90	874	99.66	2,222	98.23

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.

Counsel Peers				
Lender Name	Headquarters	2014	2015	2016
Peer 3	Oaklawn, IL	565	670	718
Peer 5	West Des Moines, IA	5,985	12,118	15,957
Peer 6	Merrillville, IN	506	703	728
Peer 8	Bloomington, IL	4,918	3,876	4,277
Peer 9	Lombard, IL	0	838	2,891
Peer 10	San Francisco, CA	6,739	13,373	15,065
Peer 11	Chicago, IL	4,356	7,188	11,988
Peer 13	Westchester, IL	322	395	629

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

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					
Applications					
Lender Name	Total Applications	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	2262	205	9.06%	43	1.90%
Peer 1	32748	8229	25.13%	3819	11.66%
Peer 2	7927	679	8.57%	197	2.49%
Peer 3	1953	247	12.65%	139	7.12%
Peer 4	13660	1160	8.49%	410	3.00%
Peer 5	34060	2460	7.22%	638	1.87%
Peer 6	1937	170	8.78%	42	2.17%
Peer 7	12019	2525	21.01%	1010	8.40%
Peer 8	13071	737	5.64%	300	2.30%
Peer 9	3729	754	20.22%	568	15.23%
Peer 10	35177	8037	22.85%	4044	11.50%

All MSAs - 2014, 2015, 2016					
Applications					
Lender Name	Total Applications	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Peer 11	23532	2840	12.07%	817	3.47%
Peer 12	3584	465	12.97%	135	3.77%
Peer 13	1346	109	8.10%	16	1.19%
Total Peers*	184743	28412	15.38%	12135	6.57%

*Total Peers does not include Townstone Financial

All MSAs - 2014					
Applications					
Lender Name	Total Applications	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	671	70	10.43%	15	2.24%
Peer 1	12171	2907	23.88%	1276	10.48%
Peer 2	1925	158	8.21%	56	2.91%
Peer 3	565	90	15.93%	43	7.61%
Peer 4	3224	295	9.15%	93	2.88%
Peer 5	5985	400	6.68%	101	1.69%
Peer 6	506	40	7.91%	17	3.36%
Peer 7	1832	481	26.26%	222	12.12%
Peer 8	4918	316	6.43%	121	2.46%
Peer 9	-	-	-	-	-
Peer 10	6739	1852	27.48%	979	14.53%
Peer 11	4356	557	12.79%	154	3.54%
Peer 12	728	92	12.64%	29	3.98%
Peer 13	322	23	7.14%	7	2.17%
Total Peers*	43271	7211	16.66%	3098	7.16%

*Total Peers does not include Townstone Financial

All MSAs - 2015					
Applications					
Lender Name	Total Applications	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	714	57	7.98%	14	1.96%
Peer 1	11973	3000	25.06%	1465	12.24%
Peer 2	2692	228	8.47%	59	2.19%
Peer 3	670	76	11.34%	48	7.16%
Peer 4	5081	419	8.25%	164	3.23%

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All MSAs - 2015					
Applications					
Lender Name	Total Applications	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Peer 5	12118	794	6.55%	201	1.66%
Peer 6	703	74	10.53%	13	1.85%
Peer 7	3761	848	22.55%	370	9.84%
Peer 8	3876	198	5.11%	80	2.06%
Peer 9	838	179	21.36%	117	13.96%
Peer 10	13373	3086	23.08%	1588	11.87%
Peer 11	7188	838	11.66%	228	3.17%
Peer 12	1257	207	16.47%	62	4.93%
Peer 13	395	29	7.34%	3	0.76%
Total Peers*	63925	9976	15.61%	4398	6.88%

*Total Peers does not include Townstone Financial

All MSAs - 2016					
Applications					
Lender Name	Total Applications	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	877	78	8.89%	14	1.60%
Peer 1	8604	2322	26.99%	1078	12.53%
Peer 2	3310	293	8.85%	82	2.48%
Peer 3	718	81	11.28%	48	6.69%
Peer 4	5355	446	8.33%	153	2.86%
Peer 5	15957	1266	7.93%	336	2.11%
Peer 6	728	56	7.69%	12	1.65%
Peer 7	6426	1196	18.61%	418	6.50%
Peer 8	4277	223	5.21%	99	2.31%
Peer 9	2891	575	19.89%	451	15.60%
Peer 10	15065	3099	20.57%	1477	9.80%
Peer 11	11988	1445	12.05%	435	3.63%
Peer 12	1599	166	10.38%	44	2.75%
Peer 13	629	57	9.06%	6	0.95%
Total Peers*	77547	11225	14.48%	4639	5.98%

*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.

All MSAs - 2014, 2015, 2016					
Loans					
Lender Name	Total Loans	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	1549	134	8.65%	24	1.55%
Peer 1	25131	6340	25.23%	2810	11.18%
Peer 2	6852	563	8.22%	140	2.04%
Peer 3	1030	105	10.19%	30	2.91%
Peer 4	9881	823	8.33%	248	2.51%
Peer 5	26796	1795	6.70%	428	1.60%
Peer 6	1497	137	9.15%	22	1.47%
Peer 7	9358	2022	21.61%	772	8.25%
Peer 8	10276	527	5.13%	191	1.86%
Peer 9	2540	502	19.76%	326	12.83%
Peer 10	28753	6460	22.47%	3110	10.82%
Peer 11	17270	2014	11.66%	481	2.79%
Peer 12	2536	321	12.66%	65	2.56%
Peer 13	1346	109	8.10%	16	1.19%
Total Peers*	143266	21718	15.16%	8639	6.03%

*Total Peers does not include Townstone Financial

All MSAs - 2014					
Loans					
Lender Name	Total Loans	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	502	54	10.76%	9	1.79%
Peer 1	8815	2119	24.04%	866	9.82%
Peer 2	1624	128	7.88%	41	2.52%
Peer 3	272	39	14.34%	10	3.68%
Peer 4	2455	213	8.68%	60	2.44%
Peer 5	4994	316	6.33%	65	1.30%
Peer 6	374	29	7.75%	7	1.87%
Peer 7	1685	457	27.12%	197	11.69%
Peer 8	3624	202	5.57%	70	1.93%
Peer 9	-	-	-	-	-
Peer 10	5234	1404	26.82%	738	14.10%

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All MSAs - 2014					
Loans					
Lender Name	Total Loans	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Peer 11	3364	413	12.28%	102	3.03%
Peer 12	525	65	12.38%	15	2.86%
Peer 13	322	23	7.14%	7	2.17%
Total Peers*	33288	5408	16.25%	2178	6.54%

*Total Peers does not include Townstone Financial

All MSAs - 2015					
Loans					
Lender Name	Total Loans	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	574	40	6.97%	9	1.57%
Peer 1	9268	2331	25.15%	1068	11.52%
Peer 2	2296	190	8.28%	39	1.70%
Peer 3	352	29	8.24%	8	2.27%
Peer 4	3135	267	8.52%	82	2.62%
Peer 5	9448	563	5.96%	128	1.35%
Peer 6	514	59	11.48%	8	1.56%
Peer 7	3144	710	22.58%	291	9.26%
Peer 8	3181	160	5.03%	50	1.57%
Peer 9	414	89	21.50%	40	9.66%
Peer 10	10814	2477	22.91%	1207	11.16%
Peer 11	5541	626	11.30%	142	2.56%
Peer 12	864	145	16.78%	28	3.24%
Peer 13	395	29	7.34%	3	0.76%
Total Peers*	49366	7675	15.55%	3094	6.27%

*Total Peers does not include Townstone Financial

All MSAs - 2016					
Loans					
Lender Name	Total Loans	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	473	40	8.46%	6	1.27%
Peer 1	7048	1890	26.82%	876	12.43%
Peer 2	2932	245	8.36%	60	2.05%
Peer 3	406	37	9.11%	12	2.96%
Peer 4	4291	343	7.99%	106	2.47%
Peer 5	12354	916	7.41%	235	1.90%

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All MSAs - 2016					
Loans					
Lender Name	Total Loans	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Peer 6	609	49	8.05%	7	1.15%
Peer 7	4529	855	18.88%	284	6.27%
Peer 8	3471	165	4.75%	71	2.05%
Peer 9	2126	413	19.43%	286	13.45%
Peer 10	12705	2579	20.30%	1165	9.17%
Peer 11	8365	975	11.66%	237	2.83%
Peer 12	1147	111	9.68%	22	1.92%
Peer 13	629	57	9.06%	6	0.95%
Total Peers*	60612	8635	14.25%	3367	5.56%

*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					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	2075	245	11.81%	18	0.87%
Peer 1	2914	352	12.08%	13	0.45%
Peer 2	6242	842	13.49%	88	1.41%
Peer 3	1951	386	19.78%	80	4.10%
Peer 4	5495	1094	19.91%	64	1.16%
Peer 5	1103	185	16.77%	13	1.18%
Peer 6	1698	211	12.43%	5	0.29%
Peer 7	2658	403	15.16%	47	1.77%
Peer 8	3797	578	15.22%	50	1.32%
Peer 9	3551	1292	36.38%	143	4.03%
Peer 10	3408	469	13.76%	115	3.37%
Peer 11	18009	3109	17.26%	278	1.54%
Peer 12	942	143	15.18%	2	0.21%

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Greater Chicago Area MSA - 2014, 2015, 2016					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Peer 13	1182	119	10.07%	2	0.17%
Total Peers*	52950	9183	17.34%	900	1.70%

Greater Chicago Area MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Greater Chicago Area MSA	2215	947	42.75%	28.29%

*Total Peers does not include Townstone Financial

Greater Chicago Area MSA - 2014					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	614	83	13.52%	8	1.30%
Peer 1	904	100	11.06%	6	0.66%
Peer 2	1437	209	14.54%	21	1.46%
Peer 3	564	133	23.58%	24	4.26%
Peer 4	1276	263	20.61%	8	0.63%
Peer 5	-	-	-	-	-
Peer 6	442	56	12.67%	4	0.90%
Peer 7	341	59	17.30%	6	1.76%
Peer 8	1158	193	16.67%	20	1.73%
Peer 9	-	-	-	-	-
Peer 10	464	50	10.78%	2	0.43%
Peer 11	3314	588	17.74%	42	1.27%
Peer 12	249	40	16.06%	0	0.00%
Peer 13	276	28	10.14%	2	0.72%
Total Peers*	10425	1719	16.49%	135	1.29%

Greater Chicago Area MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Greater Chicago Area MSA	2215	947	42.75%	28.29%

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Greater Chicago Area MSA - 2015					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	667	71	10.64%	4	0.60%
Peer 1	1144	142	12.41%	3	0.26%
Peer 2	2129	279	13.10%	25	1.17%
Peer 3	670	124	18.51%	23	3.43%
Peer 4	2034	424	20.85%	33	1.62%
Peer 5	404	55	13.61%	3	0.74%
Peer 6	596	87	14.60%	0	0.00%
Peer 7	902	145	16.08%	13	1.44%
Peer 8	1167	178	15.25%	15	1.29%
Peer 9	742	289	38.95%	29	3.91%
Peer 10	1608	258	16.04%	76	4.73%
Peer 11	5726	949	16.57%	82	1.43%
Peer 12	392	74	18.88%	2	0.51%
Peer 13	335	29	8.66%	0	0.00%
Total Peers*	17849	3033	16.99%	304	1.70%
Greater Chicago Area MSA - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Greater Chicago Area MSA	2215	947	42.75%	28.29%	

*Total Peers does not include Townstone Financial

Greater Chicago Area MSA - 2016					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	794	91	11.46%	6	0.76%
Peer 1	866	110	12.70%	4	0.46%
Peer 2	2676	354	13.23%	42	1.57%
Peer 3	717	129	17.99%	33	4.60%
Peer 4	2185	407	18.63%	23	1.05%
Peer 5	699	130	18.60%	10	1.43%
Peer 6	660	68	10.30%	1	0.15%

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Greater Chicago Area MSA - 2016					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Peer 7	1415	199	14.06%	28	1.98%
Peer 8	1472	207	14.06%	15	1.02%
Peer 9	2809	1003	35.71%	114	4.06%
Peer 10	1336	161	12.05%	37	2.77%
Peer 11	8969	1572	17.53%	154	1.72%
Peer 12	301	29	9.63%	0	0.00%
Peer 13	571	62	10.86%	0	0.00%
Total Peers*	24676	4431	17.96%	461	1.87%

Greater Chicago Area MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Greater Chicago Area MSA	2215	947	42.75%	28.29%

*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					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	1440	156	10.83%	8	0.56%
Peer 1	2292	270	11.78%	6	0.26%
Peer 2	5458	672	12.31%	62	1.14%
Peer 3	1029	135	13.12%	22	2.14%
Peer 4	4170	745	17.87%	30	0.72%
Peer 5	827	129	15.60%	8	0.97%
Peer 6	1454	158	10.87%	3	0.21%
Peer 7	2133	300	14.06%	26	1.22%
Peer 8	2893	419	14.48%	29	1.00%

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Greater Chicago Area MSA - 2014, 2015, 2016					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Peer 9	2476	806	32.55%	80	3.23%
Peer 10	2889	349	12.08%	70	2.42%
Peer 11	13342	2146	16.08%	164	1.23%
Peer 12	746	116	15.55%	2	0.27%
Peer 13	1182	119	10.07%	2	0.17%
Total Peers*	40891	6364	15.56%	504	1.23%
Greater Chicago Area MSA - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Greater Chicago Area MSA	2215	947	42.75%	28.29%	

*Total Peers does not include Townstone Financial

Greater Chicago Area MSA - 2014					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	463	62	13.39%	3	0.65%
Peer 1	693	67	9.67%	1	0.14%
Peer 2	1218	165	13.55%	15	1.23%
Peer 3	272	49	18.01%	8	2.94%
Peer 4	990	192	19.39%	3	0.30%
Peer 5	-	-	-	-	-
Peer 6	365	35	9.59%	2	0.55%
Peer 7	320	56	17.50%	5	1.56%
Peer 8	841	124	14.74%	11	1.31%
Peer 9	-	-	-	-	-
Peer 10	395	38	9.62%	1	0.25%
Peer 11	2638	443	16.79%	29	1.10%
Peer 12	202	32	15.84%	0	0.00%
Peer 13	276	28	10.14%	2	0.72%
Total Peers*	8210	1229	14.97%	77	0.94%

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Greater Chicago Area MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Greater Chicago Area MSA	2215	947	42.75%	28.29%

*Total Peers does not include Townstone Financial

Greater Chicago Area MSA - 2015					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	538	49	9.11%	2	0.37%
Peer 1	906	113	12.47%	3	0.33%
Peer 2	1836	221	12.04%	20	1.09%
Peer 3	352	37	10.51%	4	1.14%
Peer 4	1428	250	17.51%	13	0.91%
Peer 5	300	39	13.00%	1	0.33%
Peer 6	498	67	13.45%	0	0.00%
Peer 7	772	116	15.03%	8	1.04%
Peer 8	896	134	14.96%	8	0.89%
Peer 9	401	123	30.67%	7	1.75%
Peer 10	1344	200	14.88%	57	4.24%
Peer 11	4451	684	15.37%	54	1.21%
Peer 12	302	58	19.21%	2	0.66%
Peer 13	335	29	8.66%	0	0.00%
Total Peers*	13821	2071	14.98%	177	1.28%

Greater Chicago Area MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Greater Chicago Area MSA	2215	947	42.75%	28.29%

*Total Peers does not include Townstone Financial

Greater Chicago Area MSA - 2016					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	439	45	10.25%	3	0.68%
Peer 1	693	90	12.99%	2	0.29%
Peer 2	2404	286	11.90%	27	1.12%
Peer 3	405	49	12.10%	10	2.47%
Peer 4	1752	303	17.29%	14	0.80%
Peer 5	527	90	17.08%	7	1.33%
Peer 6	591	56	9.48%	1	0.17%
Peer 7	1041	128	12.30%	13	1.25%
Peer 8	1156	161	13.93%	10	0.87%
Peer 9	2075	683	32.92%	73	3.52%
Peer 10	1150	111	9.65%	12	1.04%
Peer 11	6253	1019	16.30%	81	1.30%
Peer 12	242	26	10.74%	0	0.00%
Peer 13	571	62	10.86%	0	0.00%
Total Peers*	18860	3064	16.25%	250	1.33%

Greater Chicago Area MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Greater Chicago Area MSA	2215	947	42.75%	28.29%

*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.

Chicago-Joliet-Naperville MSA - 2014, 2015, 2016					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	1572	209	13.30%	18	1.15%
Peer 1	2383	330	13.85%	13	0.55%

Chicago-Joliet-Naperville MSA - 2014, 2015, 2016

Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Peer 2	5025	666	13.25%	88	1.75%
Peer 3	1790	357	19.94%	80	4.47%
Peer 4	1027	256	24.93%	64	6.23%
Peer 5	965	173	17.93%	13	1.35%
Peer 6	47	15	31.91%	5	10.64%
Peer 7	2203	372	16.89%	47	2.13%
Peer 8	3110	480	15.43%	50	1.61%
Peer 9	3128	1203	38.46%	143	4.57%
Peer 10	2870	452	15.75%	115	4.01%
Peer 11	15284	2874	18.80%	278	1.82%
Peer 12	793	124	15.64%	2	0.25%
Peer 13	1084	113	10.42%	2	0.18%
Total Peers*	39709	7415	18.67%	900	2.27%

Chicago-Joliet-Naperville MSA - Market Demographics

Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Chicago-Joliet-Naperville MSA	1759	808	45.94%	30.75%

*Total Peers does not include Townstone Financial

Chicago-Joliet-Naperville MSA - 2014

Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	478	73	15.27%	8	1.67%
Peer 1	738	95	12.87%	6	0.81%
Peer 2	1168	170	14.55%	21	1.80%
Peer 3	517	123	23.79%	24	4.64%
Peer 4	156	39	25.00%	8	5.13%
Peer 5	-	-	-	-	-
Peer 6	21	10	47.62%	4	19.05%
Peer 7	273	53	19.41%	6	2.20%

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Chicago-Joliet-Naperville MSA - 2014					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Peer 8	921	153	16.61%	20	2.17%
Peer 9	-	-	-	-	-
Peer 10	377	45	11.94%	2	0.53%
Peer 11	2891	541	18.71%	42	1.45%
Peer 12	204	35	17.16%	0	0.00%
Peer 13	247	26	10.53%	2	0.81%
Total Peers*	7513	1290	17.17%	135	1.80%
Chicago-Joliet-Naperville MSA - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Chicago-Joliet-Naperville MSA	1759	808	45.94%		30.75%

*Total Peers does not include Townstone Financial

Chicago-Joliet-Naperville MSA - 2015					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	495	60	12.12%	4	0.81%
Peer 1	942	129	13.69%	3	0.32%
Peer 2	1687	209	12.39%	25	1.48%
Peer 3	613	112	18.27%	23	3.75%
Peer 4	379	114	30.08%	33	8.71%
Peer 5	352	50	14.20%	3	0.85%
Peer 6	12	3	25.00%	0	0.00%
Peer 7	740	135	18.24%	13	1.76%
Peer 8	977	145	14.84%	15	1.54%
Peer 9	666	272	40.84%	29	4.35%
Peer 10	1345	250	18.59%	76	5.65%
Peer 11	4917	901	18.32%	82	1.67%
Peer 12	323	61	18.89%	2	0.62%
Peer 13	303	26	8.58%	0	0.00%
Total Peers*	13256	2407	18.16%	304	2.29%

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Chicago-Joliet-Naperville MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Chicago-Joliet-Naperville MSA	1759	808	45.94%	30.75%

*Total Peers does not include Townstone Financial

Chicago-Joliet-Naperville MSA - 2016					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	599	76	12.69%	6	1.00%
Peer 1	703	106	15.08%	4	0.57%
Peer 2	2170	287	13.23%	42	1.94%
Peer 3	660	122	18.48%	33	5.00%
Peer 4	492	103	20.93%	23	4.67%
Peer 5	613	123	20.07%	10	1.63%
Peer 6	14	2	14.29%	1	7.14%
Peer 7	1190	184	15.46%	28	2.35%
Peer 8	1212	182	15.02%	15	1.24%
Peer 9	2462	931	37.81%	114	4.63%
Peer 10	1148	157	13.68%	37	3.22%
Peer 11	7476	1432	19.15%	154	2.06%
Peer 12	266	28	10.53%	0	0.00%
Peer 13	534	61	11.42%	0	0.00%
Total Peers*	18940	3718	19.63%	461	2.43%

Chicago-Joliet-Naperville MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Chicago-Joliet-Naperville MSA	1759	808	45.94%	30.75%

*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. 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.

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Chicago-Joliet-Naperville MSA - 2014, 2015, 2016					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	1100	136	12.36%	8	0.73%
Peer 1	1867	252	13.50%	6	0.32%
Peer 2	4373	529	12.10%	62	1.42%
Peer 3	933	126	13.50%	22	2.36%
Peer 4	662	144	21.75%	30	4.53%
Peer 5	730	123	16.85%	8	1.10%
Peer 6	35	11	31.43%	3	8.57%
Peer 7	1767	279	15.79%	26	1.47%
Peer 8	2386	352	14.75%	29	1.22%
Peer 9	2160	754	34.91%	80	3.70%
Peer 10	2428	336	13.84%	70	2.88%
Peer 11	11360	1993	17.54%	164	1.44%
Peer 12	622	99	15.92%	2	0.32%
Peer 13	1084	113	10.42%	2	0.18%
Total Peers*	30407	5111	16.81%	504	1.66%

Chicago-Joliet-Naperville MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Chicago-Joliet-Naperville MSA	1759	808	45.94%	30.75%

*Total Peers does not include Townstone Financial

Chicago-Joliet-Naperville MSA - 2014					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	356	55	15.45%	3	0.84%
Peer 1	561	64	11.41%	1	0.18%
Peer 2	988	137	13.87%	15	1.52%
Peer 3	248	47	18.95%	8	3.23%
Peer 4	111	30	27.03%	3	2.70%
Peer 5	-	-	-	-	-
Peer 6	15	7	46.67%	2	13.33%

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Chicago-Joliet-Naperville MSA - 2014					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Peer 7	260	50	19.23%	5	1.92%
Peer 8	681	103	15.12%	11	1.62%
Peer 9	-	-	-	-	-
Peer 10	320	34	10.63%	1	0.31%
Peer 11	2298	408	17.75%	29	1.26%
Peer 12	164	27	16.46%	0	0.00%
Peer 13	247	26	10.53%	2	0.81%
Total Peers*	5893	933	15.83%	77	1.31%

Chicago-Joliet-Naperville MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Chicago-Joliet-Naperville MSA	1759	808	45.94%	30.75%

*Total Peers does not include Townstone Financial

Chicago-Joliet-Naperville MSA - 2015					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	399	41	10.28%	2	0.50%
Peer 1	740	100	13.51%	3	0.41%
Peer 2	1446	161	11.13%	20	1.38%
Peer 3	322	33	10.25%	4	1.24%
Peer 4	202	50	24.75%	13	6.44%
Peer 5	267	38	14.23%	1	0.37%
Peer 6	8	2	25.00%	0	0.00%
Peer 7	629	109	17.33%	8	1.27%
Peer 8	753	108	14.34%	8	1.06%
Peer 9	362	118	32.60%	7	1.93%
Peer 10	1127	195	17.30%	57	5.06%
Peer 11	3820	648	16.96%	54	1.41%
Peer 12	244	47	19.26%	2	0.82%
Peer 13	303	26	8.58%	0	0.00%
Total Peers*	10223	1635	15.99%	177	1.73%

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Chicago-Joliet-Naperville MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Chicago-Joliet-Naperville MSA	1759	808	45.94%	30.75%

*Total Peers does not include Townstone Financial

Chicago-Joliet-Naperville MSA - 2016					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	345	40	11.59%	3	0.87%
Peer 1	566	88	15.55%	2	0.35%
Peer 2	1939	231	11.91%	27	1.39%
Peer 3	363	46	12.67%	10	2.75%
Peer 4	349	64	18.34%	14	4.01%
Peer 5	463	85	18.36%	7	1.51%
Peer 6	12	2	16.67%	1	8.33%
Peer 7	878	120	13.67%	13	1.48%
Peer 8	952	141	14.81%	10	1.05%
Peer 9	1798	636	35.37%	73	4.06%
Peer 10	981	107	10.91%	12	1.22%
Peer 11	5242	937	17.87%	81	1.55%
Peer 12	214	25	11.68%	0	0.00%
Peer 13	534	61	11.42%	0	0.00%
Total Peers*	14291	2543	17.79%	250	1.75%

Chicago-Joliet-Naperville MSA - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Chicago-Joliet-Naperville MSA	1759	808	45.94%	30.75%

*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. 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.

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Cook County - 2014, 2015, 2016					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	916	170	18.56%	18	1.97%
Peer 1	1575	266	16.89%	13	0.83%
Peer 2	1305	409	31.34%	88	6.74%
Peer 3	1133	285	25.15%	80	7.06%
Peer 4	591	207	35.03%	64	10.83%
Peer 5	805	162	20.12%	13	1.61%
Peer 6	34	15	44.12%	5	14.71%
Peer 7	1202	294	24.46%	47	3.91%
Peer 8	1300	349	26.85%	50	3.85%
Peer 9	2032	1001	49.26%	143	7.04%
Peer 10	2105	395	18.76%	115	5.46%
Peer 11	11871	2641	22.25%	278	2.34%
Peer 12	481	89	18.50%	2	0.42%
Peer 13	759	103	13.57%	2	0.26%
Total Peers*	25193	6216	24.67%	900	3.57%
Cook County - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Cook County	1319	740	56.10%	40.66%	

*Total Peers does not include Townstone Financial

Cook County - 2014					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	296	64	21.62%	8	2.70%
Peer 1	492	80	16.26%	6	1.22%
Peer 2	302	114	37.75%	21	6.95%
Peer 3	329	97	29.48%	24	7.29%
Peer 4	103	37	35.92%	8	7.77%
Peer 5	-	-	-	-	-
Peer 6	16	10	62.50%	4	25.00%
Peer 7	157	45	28.66%	6	3.82%

Cook County - 2014					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Peer 8	373	113	30.29%	20	5.36%
Peer 9	-	-	-	-	-
Peer 10	250	31	12.40%	2	0.80%
Peer 11	2466	508	20.60%	42	1.70%
Peer 12	103	23	22.33%	0	0.00%
Peer 13	166	23	13.86%	2	1.20%
Total Peers*	4757	1081	22.72%	135	2.84%
Cook County - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Cook County	1319	740	56.10%		40.66%

*Total Peers does not include Townstone Financial

Cook County - 2015					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	303	47	15.51%	4	1.32%
Peer 1	622	103	16.56%	3	0.48%
Peer 2	455	126	27.69%	25	5.49%
Peer 3	392	90	22.96%	23	5.87%
Peer 4	211	89	42.18%	33	15.64%
Peer 5	295	46	15.59%	3	1.02%
Peer 6	7	3	42.86%	0	0.00%
Peer 7	370	99	26.76%	13	3.51%
Peer 8	392	101	25.77%	15	3.83%
Peer 9	430	217	50.47%	29	6.74%
Peer 10	992	222	22.38%	76	7.66%
Peer 11	3863	829	21.46%	82	2.12%
Peer 12	206	48	23.30%	2	0.97%
Peer 13	207	23	11.11%	0	0.00%
Total Peers*	8442	1996	23.64%	304	3.60%

Cook County - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Cook County	1319	740	56.10%	40.66%

*Total Peers does not include Townstone Financial

Cook County - 2016					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	317	59	18.61%	6	1.89%
Peer 1	461	83	18.00%	4	0.87%
Peer 2	548	169	30.84%	42	7.66%
Peer 3	412	98	23.79%	33	8.01%
Peer 4	277	81	29.24%	23	8.30%
Peer 5	510	116	22.75%	10	1.96%
Peer 6	11	2	18.18%	1	9.09%
Peer 7	675	150	22.22%	28	4.15%
Peer 8	535	135	25.23%	15	2.80%
Peer 9	1602	784	48.94%	114	7.12%
Peer 10	863	142	16.45%	37	4.29%
Peer 11	5542	1304	23.53%	154	2.78%
Peer 12	172	18	10.47%	0	0.00%
Peer 13	386	57	14.77%	0	0.00%
Total Peers*	11994	3139	26.17%	461	3.84%

Cook County - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Cook County	1319	740	56.10%	40.66%

*Total Peers does not include Townstone Financial

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

Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	650	110	16.92%	8	1.23%
Peer 1	1215	202	16.63%	6	0.49%
Peer 2	1086	316	29.10%	62	5.71%
Peer 3	563	97	17.23%	22	3.91%
Peer 4	389	123	31.62%	30	7.71%
Peer 5	609	118	19.38%	8	1.31%
Peer 6	26	11	42.31%	3	11.54%
Peer 7	955	211	22.09%	26	2.72%
Peer 8	960	249	25.94%	29	3.02%
Peer 9	1360	610	44.85%	80	5.88%
Peer 10	1761	290	16.47%	70	3.98%
Peer 11	8860	1831	20.67%	164	1.85%
Peer 12	368	68	18.48%	2	0.54%
Peer 13	759	103	13.57%	2	0.26%
Total Peers*	18911	4229	22.36%	504	2.67%

Cook County - Market Demographics

Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Cook County	1319	740	56.10%	40.66%

*Total Peers does not include Townstone Financial

Cook County - 2014

Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	224	47	20.98%	3	1.34%
Peer 1	360	52	14.44%	1	0.28%
Peer 2	244	89	36.48%	15	6.15%
Peer 3	157	34	21.66%	8	5.10%
Peer 4	72	28	38.89%	3	4.17%
Peer 5	-	-	-	-	-
Peer 6	11	7	63.64%	2	18.18%
Peer 7	149	42	28.19%	5	3.36%
Peer 8	265	74	27.92%	11	4.15%

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Cook County - 2014					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Peer 9	-	-	-	-	-
Peer 10	211	24	11.37%	1	0.47%
Peer 11	1956	386	19.73%	29	1.48%
Peer 12	81	16	19.75%	0	0.00%
Peer 13	166	23	13.86%	2	1.20%
Total Peers*	3672	775	21.11%	77	2.10%
Cook County - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Cook County	1319	740	56.10%		40.66%

*Total Peers does not include Townstone Financial

Cook County - 2015					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	238	31	13.03%	2	0.84%
Peer 1	487	79	16.22%	3	0.62%
Peer 2	372	93	25.00%	20	5.38%
Peer 3	192	26	13.54%	4	2.08%
Peer 4	111	42	37.84%	13	11.71%
Peer 5	222	35	15.77%	1	0.45%
Peer 6	5	2	40.00%	0	0.00%
Peer 7	308	77	25.00%	8	2.60%
Peer 8	293	74	25.26%	8	2.73%
Peer 9	220	80	36.36%	7	3.18%
Peer 10	822	171	20.80%	57	6.93%
Peer 11	2994	598	19.97%	54	1.80%
Peer 12	152	35	23.03%	2	1.32%
Peer 13	207	23	11.11%	0	0.00%
Total Peers*	6385	1335	20.91%	177	2.77%

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Cook County - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Cook County	1319	740	56.10%	40.66%

**Total Peers does not include Townstone Financial*

Cook County - 2016					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	188	32	17.02%	3	1.60%
Peer 1	368	71	19.29%	2	0.54%
Peer 2	470	134	28.51%	27	5.74%
Peer 3	214	37	17.29%	10	4.67%
Peer 4	206	53	25.73%	14	6.80%
Peer 5	387	83	21.45%	7	1.81%
Peer 6	10	2	20.00%	1	10.00%
Peer 7	498	92	18.47%	13	2.61%
Peer 8	402	101	25.12%	10	2.49%
Peer 9	1140	530	46.49%	73	6.40%
Peer 10	728	95	13.05%	12	1.65%
Peer 11	3910	847	21.66%	81	2.07%
Peer 12	135	17	12.59%	0	0.00%
Peer 13	386	57	14.77%	0	0.00%
Total Peers*	8854	2119	23.93%	250	2.82%

Cook County - Market Demographics				
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts
		Tract Count	% of Tracts	
Cook County	1319	740	56.10%	40.66%

**Total Peers does not include Townstone Financial*

Appendix A

South Chicago Majority African American Census Tracts

South Chicago Majority African American Census Tracts					
Census Tract	MSA/MD	State Code	County Code	Minority Population (%)	African American Population (%)
3406.00	16974	17	031	99.89	99.12
3501.00	16974	17	031	93.47	53.92
3504.00	16974	17	031	100	95.89
3510.00	16974	17	031	95.81	73.19
3511.00	16974	17	031	99.18	96.12
3514.00	16974	17	031	97.98	94.36
3515.00	16974	17	031	87.06	77.25
3602.00	16974	17	031	99.45	96.33
3801.00	16974	17	031	97.14	91.63
3802.00	16974	17	031	98.81	94.70
3805.00	16974	17	031	100	96.14
3807.00	16974	17	031	98.15	93.72
3812.00	16974	17	031	99.22	94.74
3814.00	16974	17	031	99.44	97.64
3815.00	16974	17	031	99.16	91.56
3818.00	16974	17	031	97.81	92.34
3819.00	16974	17	031	95.75	91.97
3901.00	16974	17	031	96.53	90.77
3902.00	16974	17	031	92.93	83.37
3903.00	16974	17	031	97.41	93.36
3904.00	16974	17	031	95.23	89.67
3905.00	16974	17	031	77.78	67.96
3907.00	16974	17	031	75.7	55.29
4003.00	16974	17	031	99.49	97.13
4004.00	16974	17	031	99.49	97.08
4005.00	16974	17	031	99.47	97.17
4008.00	16974	17	031	99.7	97.89
4101.00	16974	17	031	72.31	52.61
4105.00	16974	17	031	69.42	53.54
4201.00	16974	17	031	97.64	95.14
4202.00	16974	17	031	84.04	74.00
4204.00	16974	17	031	81.72	68.17
4205.00	16974	17	031	99.05	96.07
4206.00	16974	17	031	99.01	96.44
4207.00	16974	17	031	99.63	97.70
4208.00	16974	17	031	98.19	95.57

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South Chicago Majority African American Census Tracts					
Census Tract	MSA/MD	State Code	County Code	Minority Population (%)	African American Population (%)
4212.00	16974	17	031	99.78	97.90
4301.01	16974	17	031	99.05	96.88
4301.02	16974	17	031	98.62	94.53
4302.00	16974	17	031	98.03	93.68
4303.00	16974	17	031	99.4	93.84
4304.00	16974	17	031	99.27	96.06
4305.00	16974	17	031	99.45	96.64
4306.00	16974	17	031	97.72	94.47
4307.00	16974	17	031	96.33	90.36
4308.00	16974	17	031	98.98	96.03
4309.00	16974	17	031	99.78	95.59
4312.00	16974	17	031	99.09	95.26
4313.01	16974	17	031	98.93	94.36
4313.02	16974	17	031	98.92	96.62
4314.00	16974	17	031	97.74	93.72
4401.01	16974	17	031	99.71	97.22
4401.02	16974	17	031	99.87	97.70
4402.01	16974	17	031	99.82	97.45
4402.02	16974	17	031	99.7	97.00
4403.00	16974	17	031	99.43	96.72
4406.00	16974	17	031	99.66	97.40
4407.00	16974	17	031	99.42	98.06
4408.00	16974	17	031	99.61	97.50
4409.00	16974	17	031	99.73	97.13
4503.00	16974	17	031	99.5	96.15
4601.00	16974	17	031	96.21	74.07
4603.01	16974	17	031	97.83	67.22
4603.02	16974	17	031	98.82	90.48
4604.00	16974	17	031	99.11	95.09
4605.00	16974	17	031	99.22	95.70
4606.00	16974	17	031	98.39	76.50
4607.00	16974	17	031	98.31	52.38
4610.00	16974	17	031	96.79	60.76
4701.00	16974	17	031	99.35	97.70
4801.00	16974	17	031	99.61	96.90
4802.00	16974	17	031	99.76	96.66
4803.00	16974	17	031	99.32	95.98
4804.00	16974	17	031	99.3	96.29
4805.00	16974	17	031	98	83.34
4903.00	16974	17	031	99.56	97.59

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South Chicago Majority African American Census Tracts					
Census Tract	MSA/MD	State Code	County Code	Minority Population (%)	African American Population (%)
4904.00	16974	17	031	99.72	99.24
4905.00	16974	17	031	98.71	95.18
4906.00	16974	17	031	99.87	96.29
4907.00	16974	17	031	99.87	97.89
4908.00	16974	17	031	99.55	97.18
4909.01	16974	17	031	99.69	97.46
4909.02	16974	17	031	99.8	98.27
4910.00	16974	17	031	99.75	97.43
4911.00	16974	17	031	99.34	97.32
4912.00	16974	17	031	99.26	97.01
4913.00	16974	17	031	99.31	97.09
4914.00	16974	17	031	99.49	96.93
5001.00	16974	17	031	99.42	97.53
5002.00	16974	17	031	99.4	95.78
5102.00	16974	17	031	94.74	74.05
5103.00	16974	17	031	99.5	96.88
5302.00	16974	17	031	99.67	96.99
5303.00	16974	17	031	99.77	97.36
5304.00	16974	17	031	99.24	95.01
5305.01	16974	17	031	99.52	96.80
5305.02	16974	17	031	99.76	97.42
5305.03	16974	17	031	99.59	97.38
5306.00	16974	17	031	99.38	96.63
5401.01	16974	17	031	99.17	94.63
5401.02	16974	17	031	99.87	98.39
5602.00	16974	17	031	99.54	86.64
6110.00	16974	17	031	99	73.86
6116.00	16974	17	031	98.82	65.69
6117.00	16974	17	031	99.55	63.67
6118.00	16974	17	031	99.39	75.60
6119.00	16974	17	031	98.58	83.28
6120.00	16974	17	031	98.9	92.36
6121.00	16974	17	031	98.84	93.95
6606.00	16974	17	031	97.3	58.61
6607.00	16974	17	031	99.24	94.42
6608.00	16974	17	031	95.43	61.02
6609.00	16974	17	031	95.27	83.34
6610.00	16974	17	031	97.95	89.03
6701.00	16974	17	031	99.41	95.84
6702.00	16974	17	031	100	96.16

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South Chicago Majority African American Census Tracts					
Census Tract	MSA/MD	State Code	County Code	Minority Population (%)	African American Population (%)
6703.00	16974	17	031	99.01	93.34
6704.00	16974	17	031	99.69	92.48
6705.00	16974	17	031	99.62	93.57
6706.00	16974	17	031	100	97.15
6707.00	16974	17	031	99.53	95.37
6708.00	16974	17	031	99.88	97.37
6709.00	16974	17	031	99.78	97.41
6711.00	16974	17	031	99.52	96.98
6712.00	16974	17	031	99.52	97.84
6713.00	16974	17	031	99.63	96.99
6714.00	16974	17	031	99.81	95.80
6715.00	16974	17	031	99.5	96.74
6716.00	16974	17	031	99.56	97.39
6718.00	16974	17	031	99.65	96.20
6719.00	16974	17	031	99.78	97.46
6720.00	16974	17	031	99.87	96.57
6805.00	16974	17	031	99.39	97.50
6806.00	16974	17	031	99.93	98.39
6809.00	16974	17	031	99.43	96.32
6810.00	16974	17	031	99.8	97.46
6811.00	16974	17	031	99.72	97.21
6812.00	16974	17	031	99.63	97.83
6813.00	16974	17	031	99.9	98.33
6814.00	16974	17	031	99.75	98.21
6903.00	16974	17	031	99.22	96.90
6904.00	16974	17	031	99.68	97.14
6905.00	16974	17	031	99.32	97.83
6909.00	16974	17	031	99.76	96.99
6910.00	16974	17	031	99.48	97.27
6911.00	16974	17	031	99.6	97.15
6912.00	16974	17	031	99.54	98.03
6913.00	16974	17	031	99.67	96.73
6914.00	16974	17	031	98.78	95.93
6915.00	16974	17	031	99.74	95.49
7001.00	16974	17	031	94.22	59.88
7004.01	16974	17	031	89.73	55.11
7004.02	16974	17	031	88.25	63.44
7005.01	16974	17	031	95.58	89.88
7005.02	16974	17	031	92.98	87.35
7101.00	16974	17	031	99.14	95.92

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South Chicago Majority African American Census Tracts					
Census Tract	MSA/MD	State Code	County Code	Minority Population (%)	African American Population (%)
7102.00	16974	17	031	99.64	97.43
7103.00	16974	17	031	99.86	97.45
7104.00	16974	17	031	99.65	97.73
7105.00	16974	17	031	99.83	97.72
7106.00	16974	17	031	99.95	98.91
7107.00	16974	17	031	99.83	98.52
7108.00	16974	17	031	99.79	98.01
7109.00	16974	17	031	99.73	97.18
7110.00	16974	17	031	99.57	97.70
7111.00	16974	17	031	99.82	97.25
7112.00	16974	17	031	99.83	98.11
7113.00	16974	17	031	99.75	96.74
7114.00	16974	17	031	99.74	98.19
7115.00	16974	17	031	99.53	98.23
7202.00	16974	17	031	62.75	55.45
7207.00	16974	17	031	67.96	61.38
7301.00	16974	17	031	99.71	97.24
7302.01	16974	17	031	99.81	97.98
7302.02	16974	17	031	99.61	97.82
7303.00	16974	17	031	99.66	98.80
7304.00	16974	17	031	99.26	96.53
7305.00	16974	17	031	99.66	97.22
7306.00	16974	17	031	99.03	96.49
7307.00	16974	17	031	99.53	97.43
7501.00	16974	17	031	99.28	96.96
7502.00	16974	17	031	62.63	56.06
7505.00	16974	17	031	81.54	76.97
7506.00	16974	17	031	99.65	96.85
8214.01	16974	17	031	95.36	84.96
8214.02	16974	17	031	97.32	92.89
8215.00	16974	17	031	97.78	94.66
8243.00	16974	17	031	97.17	88.22
8249.00	16974	17	031	80.87	64.63
8255.01	16974	17	031	89.22	82.89
8256.00	16974	17	031	87.31	78.09
8257.00	16974	17	031	82.67	61.51
8258.01	16974	17	031	91.89	88.34
8258.02	16974	17	031	94.43	81.49
8258.03	16974	17	031	91.09	79.78
8259.00	16974	17	031	84.17	56.91

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South Chicago Majority African American Census Tracts					
Census Tract	MSA/MD	State Code	County Code	Minority Population (%)	African American Population (%)
8260.00	16974	17	031	89.44	59.60
8261.00	16974	17	031	78.67	53.09
8262.01	16974	17	031	88.04	81.95
8262.02	16974	17	031	78.78	62.23
8263.01	16974	17	031	90.24	81.83
8263.03	16974	17	031	93.75	89.28
8263.04	16974	17	031	95.29	91.45
8264.01	16974	17	031	96.54	92.71
8264.02	16974	17	031	94.68	90.43
8265.00	16974	17	031	93.83	88.70
8266.00	16974	17	031	95.49	92.06
8267.00	16974	17	031	96.32	93.55
8269.01	16974	17	031	99.16	89.44
8269.02	16974	17	031	99.57	96.23
8270.00	16974	17	031	96.91	91.14
8271.00	16974	17	031	97.68	89.62
8272.00	16974	17	031	93.38	71.21
8273.00	16974	17	031	97.52	79.74
8274.00	16974	17	031	97.44	92.58
8275.00	16974	17	031	93.18	54.12
8276.00	16974	17	031	99.36	95.44
8277.00	16974	17	031	86.73	76.02
8278.01	16974	17	031	68.49	59.30
8278.02	16974	17	031	86.65	78.43
8278.04	16974	17	031	83.4	76.72
8278.05	16974	17	031	81.4	74.63
8279.01	16974	17	031	88.87	84.18
8339.00	16974	17	031	98.42	50.37
8340.00	16974	17	031	99.86	97.77
8342.00	16974	17	031	99.6	96.34
8343.00	16974	17	031	99.04	95.51
8344.00	16974	17	031	95.78	89.69
8345.00	16974	17	031	99.53	97.42
8346.00	16974	17	031	99.31	97.17
8347.00	16974	17	031	99.76	96.15
8348.00	16974	17	031	99.85	96.98
8349.00	16974	17	031	99.21	96.88
8350.00	16974	17	031	97.91	62.25
8355.00	16974	17	031	97.61	93.20
8356.00	16974	17	031	99.42	90.74

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South Chicago Majority African American Census Tracts					
Census Tract	MSA/MD	State Code	County Code	Minority Population (%)	African American Population (%)
8358.00	16974	17	031	98.03	93.53
8359.00	16974	17	031	98.59	95.14
8360.00	16974	17	031	97.57	93.98
8361.00	16974	17	031	97.61	95.12
8363.00	16974	17	031	76.24	65.22
8364.00	16974	17	031	97.05	92.35
8365.00	16974	17	031	98.26	95.32
8388.00	16974	17	031	96.41	53.48
8392.00	16974	17	031	90.14	71.43
8395.00	16974	17	031	89.06	80.65
8396.00	16974	17	031	96.21	90.57
8410.00	16974	17	031	77.5	50.65
8418.00	16974	17	031	98.72	95.65
8424.00	16974	17	031	99.33	96.58
8425.00	16974	17	031	99.71	97.96
8436.00	16974	17	031	98.08	94.01
8438.00	16974	17	031	76.97	52.32
8439.00	16974	17	031	96.63	91.88

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.

All MSAs - 2017					
Applications					
Lender Name	Total Applications	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	700	79	11.29%	18	2.57%
Peer 1	-	-	-	-	-
Peer 2	2905	400	13.77%	121	4.17%
Peer 3	477	57	11.95%	31	6.50%
Peer 4	5614	629	11.20%	284	5.06%
Peer 5	14216	1390	9.78%	414	2.91%
Peer 6	593	60	10.12%	12	2.02%
Peer 7	5635	1139	20.21%	504	8.94%
Peer 8	3576	204	5.70%	89	2.49%
Peer 9	2242	496	22.12%	372	16.59%
Peer 10	11422	2559	22.40%	1219	10.67%
Peer 11	11269	1586	14.07%	665	5.90%
Peer 12	1524	201	13.19%	67	4.40%

All MSAs - 2017					
Applications					
Lender Name	Total Applications	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Peer 13	630	100	15.87%	28	4.44%
Total Peers*	60103	8821	14.68%	3806	6.33%

*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 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.

All MSAs - 2017					
Loans					
Lender Name	Total Loans	50% to less than 80% Minority Census Tracts		80% to 100% Minority Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	386	44	11.40%	9	2.33%
Peer 1	-	-	-	-	-
Peer 2	2469	319	12.92%	91	3.69%
Peer 3	329	40	12.16%	10	3.04%
Peer 4	4307	458	10.63%	185	4.30%
Peer 5	11018	978	8.88%	266	2.41%
Peer 6	472	50	10.59%	10	2.12%
Peer 7	3990	830	20.80%	307	7.69%
Peer 8	2846	146	5.13%	50	1.76%
Peer 9	1568	347	22.13%	240	15.31%
Peer 10	9322	2064	22.14%	943	10.12%
Peer 11	7463	1024	13.72%	358	4.80%
Peer 12	1003	127	12.66%	36	3.59%
Peer 13	489	76	15.54%	18	3.68%
Total Peers*	45276	6459	14.27%	2514	5.55%

*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.

Greater Chicago Area MSA - 2017					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	632	97	15.35%	8	1.27%
Peer 1	-	-	-	-	-
Peer 2	2438	474	19.44%	42	1.72%
Peer 3	477	88	18.45%	21	4.40%
Peer 4	2228	517	23.20%	39	1.75%
Peer 5	544	112	20.59%	11	2.02%
Peer 6	520	72	13.85%	0	0.00%
Peer 7	1071	218	20.35%	22	2.05%
Peer 8	1152	219	19.01%	16	1.39%
Peer 9	2175	858	39.45%	110	5.06%
Peer 10	780	133	17.05%	6	0.77%
Peer 11	7136	1575	22.07%	200	2.80%
Peer 12	192	21	10.94%	0	0.00%
Peer 13	588	127	21.60%	5	0.85%
Total Peers*	19301	4414	22.87%	472	2.45%
Greater Chicago Area MSA - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Greater Chicago Area MSA	2215	947	42.75%	28.29%	

*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.

Greater Chicago Area MSA - 2017					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	362	53	14.64%	4	1.10%
Peer 1	-	-	-	-	-
Peer 2	2105	370	17.58%	26	1.24%
Peer 3	329	50	15.20%	6	1.82%
Peer 4	1719	380	22.11%	22	1.28%
Peer 5	419	84	20.05%	5	1.19%
Peer 6	452	60	13.27%	0	0.00%
Peer 7	799	139	17.40%	9	1.13%
Peer 8	859	140	16.30%	4	0.47%
Peer 9	1522	578	37.98%	69	4.53%
Peer 10	667	106	15.89%	5	0.75%
Peer 11	4646	948	20.40%	97	2.09%
Peer 12	149	16	10.74%	0	0.00%
Peer 13	459	94	20.48%	3	0.65%
Total Peers*	14125	2965	20.99%	246	1.74%
Greater Chicago Area MSA - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Greater Chicago Area MSA	2215	947	42.75%	28.29%	

*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.

Chicago-Joliet-Naperville MSA - 2017					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	480	84	17.50%	8	1.67%
Peer 1	-	-	-	-	-
Peer 2	1953	409	20.94%	42	2.15%
Peer 3	432	83	19.21%	21	4.86%
Peer 4	547	166	30.35%	39	7.13%
Peer 5	451	105	23.28%	11	2.44%
Peer 6	11	4	36.36%	0	0.00%
Peer 7	902	198	21.95%	22	2.44%
Peer 8	925	194	20.97%	16	1.73%
Peer 9	1912	802	41.95%	110	5.75%
Peer 10	643	121	18.82%	6	0.93%
Peer 11	5985	1475	24.64%	200	3.34%
Peer 12	176	20	11.36%	0	0.00%
Peer 13	541	125	23.11%	5	0.92%
Total Peers*	14478	3702	25.57%	472	3.26%
Chicago-Joliet-Naperville MSA - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Chicago-Joliet-Naperville MSA	1759	808	45.94%	30.75%	

*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%.

Chicago-Joliet-Naperville MSA - 2017					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	273	47	17.22%	4	1.47%
Peer 1	-	-	-	-	-
Peer 2	1673	316	18.89%	26	1.55%
Peer 3	291	45	15.46%	6	2.06%
Peer 4	373	110	29.49%	22	5.90%
Peer 5	341	77	22.58%	5	1.47%
Peer 6	7	1	14.29%	0	0.00%
Peer 7	668	127	19.01%	9	1.35%
Peer 8	679	120	17.67%	4	0.59%
Peer 9	1324	537	40.56%	69	5.21%
Peer 10	550	96	17.45%	5	0.91%
Peer 11	3935	894	22.72%	97	2.47%
Peer 12	137	15	10.95%	0	0.00%
Peer 13	422	92	21.80%	3	0.71%
Total Peers*	10400	2430	23.37%	246	2.37%
Chicago-Joliet-Naperville MSA - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Chicago-Joliet-Naperville MSA	1759	808	45.94%	30.75%	

*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%.

Cook County - 2017					
Applications					
Lender Name	Total Applications	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Applications	% of Applications	Applications	% of Applications
Townstone Financial	256	65	25.39%	8	3.13%
Peer 1	-	-	-	-	-
Peer 2	654	241	36.85%	42	6.42%
Peer 3	249	62	24.90%	21	8.43%
Peer 4	303	141	46.53%	39	12.87%
Peer 5	354	97	27.40%	11	3.11%
Peer 6	9	4	44.44%	0	0.00%
Peer 7	507	149	29.39%	22	4.34%
Peer 8	455	150	32.97%	16	3.52%
Peer 9	1207	636	52.69%	110	9.11%
Peer 10	450	99	22.00%	6	1.33%
Peer 11	4390	1314	29.93%	200	4.56%
Peer 12	126	15	11.90%	0	0.00%
Peer 13	398	108	27.14%	5	1.26%
Total Peers*	9102	3016	33.14%	472	5.19%
Cook County - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-Occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Cook County	1319	740	56.10%	40.66%	

*Total Peers does not include Townstone Financial

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					
Loans					
Lender Name	Total Loans	Substantial Minority Census Tracts		South Chicago Majority African American Census Tracts	
		Loans	% of Loans	Loans	% of Loans
Townstone Financial	144	35	24.31%	4	2.78%
Peer 1	-	-	-	-	-
Peer 2	530	180	33.96%	26	4.91%
Peer 3	158	32	20.25%	6	3.80%
Peer 4	203	93	45.81%	22	10.84%
Peer 5	269	70	26.02%	5	1.86%
Peer 6	5	1	20.00%	0	0.00%
Peer 7	373	93	24.93%	9	2.41%
Peer 8	317	92	29.02%	4	1.26%
Peer 9	840	429	51.07%	69	8.21%
Peer 10	380	80	21.05%	5	1.32%
Peer 11	2906	796	27.39%	97	3.34%
Peer 12	98	11	11.22%	0	0.00%
Peer 13	305	77	25.25%	3	0.98%
Total Peers*	6384	1954	30.61%	246	3.85%
Cook County - Market Demographics					
Market Area	Total Census Tracts	Substantial Minority Census Tracts		% of Total Owner-occupied Housing Located in Substantial Minority Census Tracts	
		Tract Count	% of Tracts		
Cook County	1319	740	56.10%	40.66%	

*Total Peers does not include Townstone Financial
