

# **PUBLIC DISCLOSURE**

October 10, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The Ottoville Bank Company  
RSSD# 443625

161 W. Third Street  
Ottoville, OH 45876

Federal Reserve Bank of Cleveland

P.O. Box 6387  
Cleveland, OH 44101-1387

NOTE: This document is an evaluation of this bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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## INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING

The Ottoville Bank Company is rated "**Satisfactory.**"

This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment areas (AAs) credit needs.
- A majority of the bank's loans and other lending-related activities are originated in the AA.
- Lending reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income (LMI), and an excellent penetration among businesses and farms of different sizes.
- A reasonable dispersion of loans occurs throughout the AA.

## SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination Procedures for Small Institutions were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Lending performance was assessed within the bank's Nonmetropolitan Ohio AA. The following data was reviewed:

- The bank's 21-quarter average NLTD ratio,
- An analysis of residential real estate, small business, small farm, consumer loans originated from January 1, 2020, through December 31, 2022. Consumer loans consists of motor vehicle, other secured, and other unsecured loans combined. Due to limited volumes, lending for all years was combined for each loan product.
- Based on total volume and dollar amount residential real estate lending received the most weight, followed by small business, small farm, and consumer lending, respectively.

**DESCRIPTION OF INSTITUTION**

The Ottoville Bank Company (Ottoville) is a community bank headquartered in Ottoville, Ohio.

The bank’s characteristics include:

- Ottoville does not have a holding company or nonbank subsidiaries.
- The bank has total assets of \$86.8 million and total deposits of \$67.5 million as of March 31, 2023. This is an increase of 4.7% and 8.7%, respectively since the previous evaluation.
- Ottoville has a main office with a full-service ATM in Ottoville (Putnam County) in an upper income tract.
- Ottoville has not opened or closed any branches since the previous evaluation.
- The bank closed a loan production office in Delphos (Allen County) in an upper-income tract within its AA effective October 31, 2018.
- As shown in the table below, the bank’s primary business focus is residential real estate.

<b>Composition of Loan Portfolio as of March 31, 2023</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	191	0.5
Farmland	9,579	23.0
1-4 Family Residential Real Estate	9,824	23.6
Multifamily Residential Real Estate	5,279	12.7
Non-Farm Non-Residential Real Estate	9,728	23.4
Agricultural	901	2.2
Commercial and Industrial	4,532	10.9
Consumer	295	0.7
Other	1,300	3.1
<b>Gross Loans</b>	<b>41,629</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

Ottoville was rated “Satisfactory” under the CRA at its July 9, 2018, performance evaluation.

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

**DESCRIPTION OF ASSESSMENT AREA**

Ottoville has one delineated CRA AA in Nonmetropolitan Ohio. The AA consists of the entireties of Defiance, Henry, Paulding, Putnam, and Van Wert counties and three tracts in western Allen County. Allen County is the only county in the Lima, OH Metropolitan Statistical Area (MSA). Since there are no deposit-taking facilities in this county and the tracts are contiguous to the nonmetropolitan area, these tracts were included in the bank’s Nonmetropolitan Ohio AA.

In 2020 and 2021 the AA consisted of one tract in southwestern Paulding County, two tracts in western Putnam County, two tracts in northeastern Van Wert County, and three tracts in western Allen County. In 2022 Ottoville expanded its delineated AA by adding the entireties of Defiance and Henry counties and taking the entireties of Paulding, Putnam, and Van Wert counties. No changes were made in Allen County. Also, the Census Bureau released new size and population data from the 2020 Census on August 12, 2021. See Appendix A for an AA map and Appendix B for additional demographic data.

- Due to these changes, the AA was comprised of the following census tracts for this evaluation:

<b>Census Tract Designations</b>		
<b>Assessment Area: Nonmetropolitan Ohio</b>		
<b>Income Tract Level</b>	<b>2020-2021</b>	<b>2022</b>
Low	0	0
Moderate	0	5
Middle	5	28
Upper	3	8
Unknown	0	0
<b>Total</b>	<b>8</b>	<b>41</b>

- Between 2021 and 2022, the AA gained five moderate-, 23 middle-, and five upper-income tracts. The AA has no low- or unknown-income tracts.
- No middle-income tracts were designated by the regulatory agencies as underserved or distressed during the evaluation period.<sup>1</sup>
- Based on the June 30, 2022, Federal Deposit Insurance Corporation’s (FDIC) Deposit Market Share Report, Ottoville ranked 19<sup>th</sup> out of 26 financial institutions operating in the AA with 1.1% market share. Premier Bank, JP Morgan Chase Bank, National Association, and The Huntington National Bank hold the largest share of deposits in the market at 18.6%, 11.1%, and 10.2%, respectively.
- Two community contact interviews were conducted as part of this evaluation to provide supplemental information regarding the area’s credit needs and context to demographic and economic conditions of the local community.
  - The first interview was with a representative from a community action organization that helps LMI individuals and families secure safe and affordable housing and addresses fair housing issues and homeless prevention. The contact stated available housing is currently at a premium and the occupancy rate is around 98.0%. More than half of the workers in the community commute from longer distances due to the lack of reasonably priced housing options near employment locations. The community formed a housing coalition to help address the affordable housing

<sup>1</sup> [FFIEC Distressed and Underserved Tracts](#)

shortage. While the contact believes local banks are actively engaged in the community, mostly through donations and volunteerism; there are opportunities for banks to mitigate the area’s lack of affordable housing.

- The second interview was with a representative from a community action association that provides a wide range of services to LMI individuals and families, including but not limited to home weatherization and repair, financial literacy programs, and childcare services. The contact explained that existing affordable housing stock is limited, and new housing is not being constructed. This area also has large number of older homes that are dilapidated and in need of costly repairs and maintenance. It is not uncommon to find low-income seniors living in unsafe homes in need of costly structural repairs. The contact also highlighted the lack of available childcare and reliable transportation services for LMI individuals to get to work, access basic needs, and/or attend job training and workforce development programs. While public funding is available to help make childcare more affordable (defined as 7.0% of household income) for working LMI families, there is a shortage of available licensed childcare, especially in lower-income neighborhoods. These issues prevent people, especially lower-income individuals, from being fully engaged in the workforce. The contact said local banks are responsive to the credit needs of the community and were particularly responsive to small businesses’ needs during the COVID-19 emergency.

**Population Characteristics**

Population Change					
Assessment Area: Nonmetropolitan Ohio					
Area	2015 Population	2020 Population	Percent Change – 2015 to 2020	2022 Population	Percent Change – 2020 to 2022
Allen County	105,196	102,206	-2.8%	101,115	-1.1%
Defiance County	38,669	38,286	-1.0%	38,187	-0.3%
Henry County	28,015	27,662	-1.3%	27,512	-0.5%
Paulding County	19,165	18,806	-1.9%	18,757	-0.3%
Putnam County	34,184	34,451	0.8%	34,334	-0.3%
Van Wert County	28,576	28,931	1.2%	28,769	-0.6%
Ohio	11,575,977	11,799,448	1.9%	11,756,058	-0.4%

Source: 2011-2015 U.S. Census Bureau: American Community  
2020 U.S. Census Bureau Decennial Census  
U.S. Census Bureau Vintage 2022 Population Estimates for the United States and States

- The AA experienced a 2.0% decline in population between 2015 and 2022.
- 76.5% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- 18.2% of the population in the AA was age 65 and over, compared to 16.9% in Ohio.
- AA population is aging and decreasing resulting in a shrinking working population or lack of labor supply and increasing demand for leisure and healthcare services.

Population Change - Municipalities Assessment Area: Nonmetropolitan Ohio				
Area	Municipality	2010 Population	2020 Population	Percent Change - 2010 to 2020
Defiance County	Defiance city	16,494	17,066	3.5%
Henry County	Napoleon city	8,749	8,862	1.3%
Paulding County	Paulding village	3,605	3,555	-1.4%
Putnam County	Ottawa village	4,460	4,456	-0.1%
Van Wert County	Van Wert city	10,846	11,092	2.3%

Source: 2020 U.S. Census Bureau Decennial Census

- Defiance experienced the largest increase in population at 3.5% while Paulding experienced a decrease in population of 1.4% between 2010 and 2020.

**Income Characteristics**

Borrower Income Levels Assessment Area: Nonmetropolitan Ohio										
FFIEC Estimated Median Family Income			Low		Moderate		Middle		Upper	
Year	\$	% Change	0	49.9%	50%	79.9%	80%	119.9%	120%	& above
2020	\$63,400		0	\$31,699	\$31,700	\$50,719	\$50,720	\$76,079	\$76,080	& above
2021	\$64,700	2.1	0	\$32,349	\$32,350	\$51,759	\$51,760	\$77,639	\$77,640	& above
2022	\$74,900	15.8	0	\$37,449	\$37,450	\$59,919	\$59,920	\$89,879	\$89,880	& above

Source: 2020-2022 FFIEC Census Data

- From 2020 through 2022, median family income (MFI) in the AA increased by 18.1%.
- In 2015 MFI in the AA was \$59,366, so the MFI increased by 9.0% from 2015 through 2021.
- According to 2020 U.S. Census data, AA MFI at \$73,004 is 1.9% less than Ohio MFI at \$74,391.
- Ohio minimum wage for 2023 is \$10.10 per hour or \$21,008 annually. Prior to 2023, minimum wage was \$7.25 per hour.

Poverty Rates Assessment Area: Nonmetropolitan Ohio			
Area	2019	2020	2021
Allen County	12.9	12.9	15.3
Defiance County	8.8	8.5	10.1
Henry County	7.5	8.0	8.9
Paulding County	9.8	9.3	10.3
Putnam County	7.2	6.5	7.1
Van Wert County	8.5	7.4	8.9
Ohio	13.0	12.6	13.3
United States	12.3	11.9	12.8

Source: U.S. Census Bureau Small Area Income and Poverty Estimates Program

- Except for Allen County, poverty rates across the AA were below poverty rates in Ohio and the United States.

- Of the 44,763 families in the AA, 31.8% are designated as LMI with 6.7% living below the poverty level, which is less 38.8% of families designated as LMI and 9.6% of families living below poverty in Ohio.
- Of the 63,732 households in the AA, 9.0% are below the poverty level, and 1.5% receive public assistance.
- Supplemental Nutrition Assistance Program (SNAP)<sup>2</sup> helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

<b>SNAP Assistance</b>	
<b>Assessment Area: Nonmetropolitan Ohio</b>	
<b>Area</b>	<b>2022</b>
Allen County	13.6
Defiance County	9.6
Henry County	5.4
Paulding County	9.9
Putnam County	5.3
Van Wert County	8.0
Ohio	13.1

*Source: Federal Reserve Economic Data (FRED) | Federal Reserve Bank of St. Louis*

- Between 2020 through 2022, Allen, Paulding, and Defiance counties had the highest poverty rates, which corresponds with the percentages of SNAP recipients.

**Housing Characteristics**

<b>Housing Cost Change</b>						
<b>Assessment Area: Nonmetropolitan Ohio</b>						
<b>Area</b>	<b>Median Housing Value</b>			<b>Median Gross Rent</b>		
	<b>2015</b>	<b>2021</b>	<b>Percent Change</b>	<b>2015</b>	<b>2021</b>	<b>Percent Change</b>
Allen County	\$105,400	\$126,900	20.4%	\$639	\$758	18.6%
Defiance County	\$108,900	\$131,400	20.7%	\$664	\$756	13.9%
Henry County	\$111,000	\$138,100	24.4%	\$686	\$785	14.4%
Paulding County	\$91,900	\$107,700	17.2%	\$587	\$704	19.9%
Putnam County	\$138,900	\$158,300	14.0%	\$684	\$754	10.2%
Van Wert County	\$95,800	\$112,300	17.2%	\$635	\$721	13.5%
Ohio	\$129,900	\$159,900	23.1%	\$730	\$870	19.2%

*Source: 2011-2015 U.S. Census Bureau: American Community Survey  
2017-2021 U.S. Census Bureau: American Community Survey*

- The cost of homes and rents across the AA outpaced MFI from 2015 to 2021. Home prices and rents rose on average about 16.5%, while MFI rose only 9.0% during this period.

<sup>2</sup> [FRED – SNAP Benefit Recipients](#)



- The rise in median gross rents indicates the need for more affordable housing. According to 2020 Census data, 33.9% of all renters have rental costs that are at least 30.0% of their income.
- According to the U.S. Department of Housing and Urban Development's (HUD)'s 2021 Fair Market Rents data,<sup>3</sup> the average rent for a two-bedroom unit is \$739 a month (requiring a minimum annual salary of \$29,550).
- With Ohio's minimum wage at \$10.10, renters across the state can only afford \$525 in monthly rent. They typical minimum wage worker cannot afford rent for a FRM two-bedroom apartment in this AA.
- According to the National Low Income Housing Coalition,<sup>4</sup> full-time workers must earn at least \$19 an hour (\$39,520 annual salary) in Ohio, which is nearly double the minimum wage. Rents continue to increase nationwide; currently the national average rent is \$1,486 a month, which requires workers to earn a minimum wage of \$28.58 (\$59,445 annual salary).
- There are 69,369 housing units in the AA, of which 72.4% are owner occupied, 19.5% are rentals, and 8.1% are vacant.
- There are 6,280 housing units in moderate-income tracts, of which 50.3% are owner occupied, 41.0% are rentals, and 8.7% are vacant.
- With nearly 50.0% of housing units in moderate income tracts being either rental or vacant, there may be limited opportunities to originate residential real estate loans in these five tracts.
- The median housing age of housing stock in the AA is 61 years old, and 34.6% of housing units were built prior to 1950. The age of the housing stock across the AA demonstrates a potential need for home improvement lending and refinance or home improvement loans to remove lead-based paint that was commonly used on houses and apartments built before 1978.<sup>5</sup>

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<sup>3</sup> [HUD's Fair Market Rents \(2021\)](#)

<sup>4</sup> [National Low Income Housing Coalition \(2023\)](#)

<sup>5</sup> [Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning](#)

Housing Cost Burden						
Assessment Area: Nonmetropolitan Ohio						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Allen County	71.3%	22.6%	40.5%	54.4%	22.8%	14.0%
Defiance County	71.6%	13.1%	33.1%	53.6%	19.3%	11.7%
Henry County	68.2%	10.0%	26.9%	56.9%	23.8%	14.1%
Paulding County	67.2%	19.8%	32.3%	53.7%	12.7%	13.0%
Putnam County	61.5%	4.9%	26.4%	40.7%	14.8%	10.2%
Van Wert County	78.7%	10.3%	37.9%	60.9%	21.5%	13.8%
Assessment Area	56.6%	22.3%	14.2%	74.2%	16.4%	35.4%
Ohio	59.3%	26.5%	16.7%	71.5%	24.1%	39.7%

*Cost Burden is housing cost that equals 30 percent or more of household income*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy*

- 74.2% of low-income homeowners and 56.6% of low-income renters across the AA are cost burdened, compared to 16.4% of moderate-income homeowners and 22.3% of moderate-income renters in the county.
- 14.2% of all homeowners across the AA are cost burdened which is less than all homeowners in Ohio at 16.7%.
- 35.4% of all renters across the AA are cost burdened which is less than all renters in Ohio at 39.7%.
- This data shows that cost burden disproportionately affects renter-occupied households, particularly low-income renters as well as low-income homeowners.
- Cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

**Labor, Employment and Economic Characteristics**

Unemployment Rates			
Assessment Area: Nonmetropolitan Ohio			
Area	2019	2020	2021
Allen County	4.1%	8.6%	5.7%
Defiance County	4.3%	8.2%	4.7%
Henry County	4.7%	8.1%	5.2%
Paulding County	3.9%	7.5%	4.3%
Putnam County	3.1%	5.6%	3.4%
Van Wert County	3.3%	7.0%	3.9%
Ohio	4.2%	8.2%	5.1%

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- During this time period, unemployment rates in Allen, Defiance, and Henry counties generally exceeded Ohio.
- In 2020, the unemployment rate increased substantially in response to the COVID-19

pandemic. While the unemployment rate decreased in 2021, they have not fully rebounded to pre-COVID-19 levels.

- Unemployment rates in Putman County were consistently the lowest in the AA and below Ohio during this time period.
- As reported by the Ohio Office of Research:<sup>6</sup>
  - Land use across the AA is primarily rural or unusable with less than 10.0% available for urban (i.e., residential, commercial, industrial, or recreational) development.
- The leading industries across the AA are manufacturing; trade, transportation, and utilities; local government; and education and health services. The average weekly wage for the private sector is \$786 which indicates that employed persons can afford the median rent of \$746.
- Online job advertisements by county provide one aspect of the labor market and labor demand within the county. According to data from the Ohio Labor Market Information,<sup>7</sup> Promedica and ShiftMed are top employers with the most online job ads across the AA. Other top employers in the AA include but are not limited to Midway Products Group, Gainwell, Campbell's Soup Company, Lippert Components Manufacturing, FIS Global, First Federal Bank, Amazon, and Nationwide.
- According to U.S. Census data, an estimated 91.3% of households in the AA have a computer, which is marginally below the national average of 93.1%. On average, 84.0% of households in the AA have a broadband internet subscription, compared to 87.0% of all U.S. households.<sup>8</sup> Paulding County had the lowest percentage of broadband internet subscriptions at 77.0%.
- According to BroadbandOhio,<sup>9</sup> an estimated 86.2% of the population and 48.8% of households in the AA do not have access to a reasonable minimum standard for broadband.
- A Federal Reserve Bank of Cleveland report, *Access to Broadband is Essential for Positive Economic Outcomes*,<sup>10</sup> found that employment rates differed markedly for those with and without broadband in both urban and rural counties. Nationally, those with access to a broadband-enabled computer are employed at a higher rate in urban and rural counties.

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<sup>6</sup> [Ohio Department of Development - Ohio County Trends](#)

<sup>7</sup> [Ohio Labor Market Information – Online Job Postings](#)

<sup>8</sup> [United States Census Bureau – QuickFacts](#)

<sup>9</sup> [BroadbandOhio – Availability Gaps \(by county\)](#)

<sup>10</sup> [FRB Cleveland – Access to Broadband](#)

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison, to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based asset size, product offerings, market share, area where they are located. Given the bank’s size, financial condition, and AA credit needs Ottoville’s NLTD ratio is reasonable.

Loan-to-Deposit Ratios							
The Ottoville Bank Company, Ottoville, Ohio				The Corn City State Bank, Deshler, OH	The Hamler State Bank, Hamler, OH	The Sherwood State Bank, Sherwood, OH	CUSTOM PEER RATIO
As of Date	Net Loans \$(000s)	Total Deposits \$(000s)	Bank Ratio	Peer 1 Ratio	Peer 2 Ratio	Peer 3 Ratio	Custom Peer Ratio
March 31, 2023	40,595	67,478	60.2	54.1	80.0	85.3	73.1
December 31, 2022	42,902	68,628	62.5	56.5	90.2	83.0	76.5
September 30, 2022	42,393	69,526	61.0	58.0	84.1	78.5	73.5
June 30, 2022	43,063	72,227	59.6	55.5	79.2	72.1	68.9
March 31, 2022	43,913	72,497	60.6	50.8	78.2	70.3	66.4
December 31, 2021	41,467	67,878	61.1	53.9	85.9	70.3	70.0
September 30, 2021	40,014	68,868	58.1	56.4	84.5	72.2	71.0
June 30, 2021	40,146	68,399	58.7	55.4	83.9	75.4	71.6
March 31, 2021	39,897	67,547	59.1	55.6	83.8	77.0	72.1
December 31, 2020	40,494	65,931	61.4	57.8	86.2	79.9	74.6
September 30, 2020	40,965	64,043	64.0	58.6	88.6	82.1	76.4
June 30, 2020	40,128	62,349	64.4	58.4	89.1	85.2	77.5
March 31, 2020	44,331	60,944	72.7	58.8	86.4	87.0	77.4
December 31, 2019	44,651	55,491	80.5	60.9	85.0	86.6	77.5
September 30, 2019	45,546	56,608	80.5	63.4	82.5	87.0	77.6
June 30, 2019	46,467	58,089	80.0	62.6	82.0	87.6	77.4
March 31, 2019	46,758	59,392	78.7	60.3	82.5	84.2	75.7
December 31, 2018	46,806	59,671	78.4	63.0	85.0	86.1	78.1
September 30, 2018	47,860	60,428	79.2	62.7	81.0	79.1	74.3
June 30, 2018	47,394	60,003	79.0	63.3	78.3	79.6	73.7
March 31, 2018	47,880	65,108	73.5	61.0	78.1	72.7	70.6
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation			68.2	58.4	83.5	80.1	74.0

Ottoville’s NLTD ratio averaged 68.2% compared to custom peer group average of 74.0%. Bank management indicated there has been an increase in deposits (starting 2Q 2020) due to direct payments to consumers and small businesses from various economic stimulus programs in response to the COVID-19 pandemic. Fluctuations in deposits and loan demand can be attributed to competition and rising interest rates. However, long-term stability is the result of having a loyal customer base and strong core deposits. Given these factors, Ottoville’s NLTD ratio is considered reasonable given the bank’s size, financial condition, and AA credit needs.

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. A majority of loans and other lending-related activities are in the AA.

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Motor Vehicle	9	75.0	74	53.0	3	25.0	65	47.0
Other – Secured	8	66.7	163	72.6	4	33.3	62	27.4
Other - Unsecured	5	100.0	24	100.0	0	0.0	0	0.0
<b>Total Consumer related</b>	<b>22</b>	<b>75.9</b>	<b>260</b>	<b>67.3</b>	<b>7</b>	<b>24.1</b>	<b>127</b>	<b>32.7</b>
Home Equity	3	100.0	77	100.0	0	0.0	0	0.0
Residential	29	58.0	4,946	54.3	21	42.0	4,168	45.7
<b>Total Residential Real Estate related</b>	<b>32</b>	<b>60.4</b>	<b>5,023</b>	<b>54.6</b>	<b>21</b>	<b>39.6</b>	<b>4,168</b>	<b>45.4</b>
Small Business	27	44.3	4,858	17.7	34	55.7	22,524	82.3
<b>Total Small Business related</b>	<b>27</b>	<b>44.3</b>	<b>4,858</b>	<b>17.7</b>	<b>34</b>	<b>55.7</b>	<b>22,524</b>	<b>82.3</b>
Small Farm	21	72.4	3,123	46.5	8	27.6	3,591	53.5
<b>Total Small Farm related</b>	<b>21</b>	<b>72.4</b>	<b>3,123</b>	<b>46.5</b>	<b>8</b>	<b>27.6</b>	<b>3,591</b>	<b>53.5</b>
<b>Total Loans</b>	<b>102</b>	<b>59.3</b>	<b>13,264</b>	<b>30.4</b>	<b>70</b>	<b>40.7</b>	<b>30,410</b>	<b>69.6</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

During the evaluation period, 59.3% of total loans by volume and 30.4% by dollar amount were made inside the AA. The majority of total consumer- and residential real estate-related loans by volume and dollar amount were made inside the AA.

The total dollar amount of small business-related lending outside the AA is skewed by one large loan (\$10.0 million) made in the excluded portion of Van Wert County in 2021. The entirety of Van Wert County was added to the AA in 2022. If this loan had been originated in 2022, the percentage of small business-related lending by dollar amount inside the AA would have been 53.3% versus 17.7%.

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

Borrower distribution received more weight than geographic distribution based on the percentage of LMI families (31.8%) compared to percentage of LMI geographies (12.2%) in the AA.

Ottoville’s lending has a reasonable distribution among individuals of different income levels and excellent among businesses and farms of different sizes. Residential real estate has a poor borrower distribution and consumer lending has an excellent borrower distribution. The penetration among businesses and farms of different sizes is excellent.

**Residential Real Estate Lending**

- Ottoville originated 29 residential real estate loans totaling \$5.0 million during the evaluation period.
- Ottoville originated five (17.2%) residential real estate loans to borrowers with unknown-income designations.
- Ottoville’s performance was compared to the percentage of families (proxy).

Distribution of 2020-2022 of Residential Real Estate Loans by Borrower Income Level					
Assessment Area: Nonmetropolitan Ohio					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	%	
Low	1	3.4	110	2.2	14.5
Moderate	1	3.4	49	1.0	17.3
Middle	9	31.0	1,290	26.1	23.2
Upper	13	44.8	2,833	57.3	44.9
Unknown	5	17.2	664	13.4	0.0
<b>Total</b>	<b>29</b>	<b>100.0</b>	<b>4,946</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020-2022 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

- Ottoville originated one (3.4%) residential real estate loan low-income borrowers and one (3.4%) loan to moderate-income borrowers, which fell significantly below the percentage of families at 14.5% and 17.3%, respectively.
- While this appears to be a very poor penetration, Ottoville has a limited presence in this competitive market and a low volume of loans. Therefore, the borrower distribution of residential real estate loans to LMI individuals is poor.

**Small Business Lending**

- Ottoville 27 business loans totaling \$4.9 million during the evaluation period.
- Ottoville originated three (11.1%) small business loans to businesses with unknown revenue.
- Ottoville’s performance was compared to the percentage of businesses (proxy).

Distribution of 2020-2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Nonmetropolitan Ohio					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	23	85.2	2,629	54.1	87.8
<b>Over \$1 Million</b>	1	3.7	1,500	30.9	9.4
<b>Revenue Unknown</b>	3	11.1	729	15.0	2.7
<b>Total</b>	27	100.0	4,858	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	18	66.7	905	18.6	
<b>\$100,001 - \$250,000</b>	3	11.1	602	12.4	
<b>\$250,001 - \$1 Million</b>	5	18.5	1,851	38.1	
<b>Total</b>	27	100.0	4,858	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	17	73.9	866	32.9	
<b>\$100,001 - \$250,000</b>	2	8.7	352	13.4	
<b>\$250,001 - \$1 Million</b>	4	17.4	1,411	53.7	
<b>Total</b>	23	100.0	2,629	100.0	
<i>Source: 2020-2022 FFIEC Census Data 2022 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

- Ottoville originated 23 (85.2%) loans to businesses with revenues of \$1.0 million or less, which was comparable the percentage of small businesses at 87.8%.
- In addition, Ottoville originated 66.7% of loans to businesses in amounts of \$100,000 or less.
- Ottoville’s willingness to lend in smaller amounts exhibits an adequate responsiveness to credit needs of small businesses in the AA, since small dollar loans tend to represent amounts typically requested by small businesses. Therefore, the distribution among businesses of different sizes is excellent.

### **Small Farm Lending**

- Ottoville originated 21 farm loans totaling \$3.1 million during the evaluation period.
- Ottoville originated one (4.8%) small farm loan to a farm with unknown revenue.
- Ottoville’s performance was compared to the percentage of farms (proxy).

Distribution of 2020-2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Nonmetropolitan Ohio					
	Bank Loans				Total Farms %
	#	#%	\$(000)	%	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	20	95.2	3,073	98.4	98.4
<b>Over \$1 Million</b>	0	0.0	0	0.0	1.1
<b>Revenue Unknown</b>	1	4.8	50	1.6	0.5
<b>Total</b>	21	100.0	3,123	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	13	61.9	728	23.3	
<b>\$100,001 - \$250,000</b>	3	14.3	405	13.0	
<b>\$250,001 - \$500,000</b>	4	19.0	1,482	47.5	
<b>Total</b>	21	100.0	3,123	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	12	60.0	678	22.1	
<b>\$100,001 - \$250,000</b>	3	15.0	405	13.2	
<b>\$250,001 - \$500,000</b>	4	20.0	1,482	48.2	
<b>Total</b>	20	100.0	3,073	100.0	
<i>Source: 2020-2022 FFIEC Census Data 2022 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

- Ottoville originated 20 (95.2%) loans to farms with revenues of \$1.0 million or less, which was comparable the percentage of small farms at 98.4%.
- In addition, Ottoville originated 61.9% of loans to farms in amounts of \$100,000 or less. Ottoville’s willingness to lend in smaller amounts exhibits an adequate responsiveness to credit needs of small farms in the AA, since small dollar loans tend to represent amounts typically requested by small farms. Therefore, the distribution among farms of different sizes is excellent.

**Consumer Lending**

- Ottoville originated 22 consumer loans totaling \$260,000 during the evaluation period.
- Ottoville originated one (4.5%) consumer loan to borrowers with unknown income designations.
- Ottoville’s performance was compared to the percentage of households (proxy).



Distribution of 2020-2022 Consumer Loans By Borrower Income Level Assessment Area: Nonmetropolitan Ohio					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	%	\$(000)	\$%	
Low	4	18.2	22	8.4	17.6
Moderate	7	31.8	102	39.1	15.4
Middle	8	36.4	110	42.1	19.6
Upper	2	9.1	25	10.0	47.4
Unknown	1	4.5	1	0.4	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>260</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020-2022 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

- Ottoville originated four (18.2%) consumer loans to low-income borrowers and seven (31.8%) loans to moderate-income borrowers, which exceeded the percentage of families at 17.6% to low-income borrowers and substantially exceeded proxy at 15.4% to moderate income borrowers. Therefore, borrower distribution of consumer loans to LMI individuals is excellent.

### Geographic Distribution of Loans

Ottoville’s geographic distribution of loans reflects a reasonable dispersion throughout the AA. Residential real estate, small farm, and consumer lending have a reasonable geographic distribution and small business has an excellent geographic distribution. There is a significant level of lending gaps in the AA.

Percentage of Lending Penetration			
Tract Income Level	2020	2021	2022
Low	N/A	N/A	N/A
Moderate	N/A	N/A	20.0%
Middle	80.0%	60.0%	28.6%
Upper	100.0%	100.0%	37.5%
<b>Total</b>	<b>87.5%</b>	<b>75.0%</b>	<b>29.3%</b>

Ottoville penetrated 64.0% of its tracts during the evaluation period, which is a significant level of lending gaps. While the gaps in lending are substantial in moderate-income tracts, the AA gained the five moderate-income tracts in 2022 because of changes to the AA and 2020 Census data. There is one moderate-income tract in Defiance County, one in Henry County, and three in Van Wert County. Ottoville’s main office is at least 12 to 33 miles away from four of these tracts and four miles away from the closest moderate-income tract. Based on the limited time these tracts have been in AA and the distance from the main office, there appears to be limited opportunities for Ottoville to originate loans in these tracts.

**Residential Real Estate Lending**

- Ottoville originated 29 residential real estate loans totaling \$5.0 million during the evaluation period.
- Ottoville’s performance was compared to the percentage of owner-occupied units (proxy).

Distribution of 2020-2022 Residential Real Estate Loans by Income Level of Geography					
Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	#%	\$(000)	\$%	
Moderate	0	0.0	0	0.0	6.3
Middle	15	51.7	2,524	51.0	70.4
Upper	14	48.3	2,422	49.0	23.3
<b>Total</b>	<b>29</b>	<b>100.0</b>	<b>4,946</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020-2022 FFIEC Census Data  
 2016-2020 U.S. Census Bureau: American Community Survey  
 Note: Percentages may not total 100.0 percent due to rounding.

- Ottoville originated no residential real estate loans in moderate income tracts, compared to the percentage of owner-occupied units at 6.3%.
- While this appears to be a very poor distribution, the AA only gained the five moderate-income tracts in 2022. Ottoville’s main office is at least 12 to 33 miles away from four of these tracts and four miles away from the closest moderate-income tract. Based on the limited time these tracts have been in AA and the distance from the main office, the geographic distribution of residential real estate loans in moderate-income tracts is reasonable.

**Small Business Lending**

- Ottoville originated 27 small business loans totaling \$4.9 million during the evaluation period.
- Ottoville’s performance was compared to the percentage of total businesses (proxy).

Distribution of 2020-2022 Small Business Lending By Income Level of Geography					
Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Moderate	3	11.1	364	7.5	11.1
Middle	14	51.9	1,895	39.0	67.0
Upper	10	37.0	2,599	53.5	21.9
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>4,858</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020-2022 FFIEC Census Data  
 2022 Dun & Bradstreet Data  
 2016-2020 U.S. Census Bureau: American Community Survey  
 Note: Percentages may not total 100.0 percent due to rounding.

- Ottoville originated three (11.1%) small business loans in moderate-income tracts, which is comparable to the percentage of businesses at 11.1%. Therefore, the geographic distribution of small business loans in moderate-income tracts is excellent.

**Small Farm Lending**

- Ottoville originated 21 small farm loans totaling \$3.1 million during the evaluation period.
- Ottoville’s performance was compared to the percentage of total farms (proxy).

Distribution of 2020-2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
Moderate	0	0.0	0	0.0	0.6
Middle	8	38.1	1,074	34.4	68.0
Upper	13	61.9	2,049	65.6	31.3
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>3,123</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020-2022 FFIEC Census Data  
 2022 Dun & Bradstreet Data  
 2016-2020 U.S. Census Bureau: American Community Survey  
 Note: Percentages may not total 100.0 percent due to rounding.

- Ottoville originated no small farm loans in moderate-income tracts, compared to the percentage of farms at 0.6%.
- While this appears to be a very poor distribution, the proxy at 0.6% shows there are few farms in the AA’s five moderate-income tracts. Based on the limited number of moderate-income tracts and farms in those tracts, the geographic distribution of small farm loans in moderate-income tracts is reasonable.

**Consumer Lending**

- Ottoville originated 22 consumer loans totaling \$260,000 during the evaluation period.
- Ottoville’s performance was compared to the percentage of households (proxy).

<b>Distribution of 2020-2022 Consumer Loans By Income Level of Geography</b>					
<b>Assessment Area: Nonmetropolitan Ohio</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Households %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Moderate</b>	0	0.0	0	0.0	9.0
<b>Middle</b>	11	50.0	127	48.8	69.8
<b>Upper</b>	11	50.0	133	51.2	21.2
<b>Total</b>	22	100.0	260	100.0	100.0

*Source: 2020-2022 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey*

*Note: Percentages may not total 100.0 percent due to rounding.*

- Ottoville originated no consumer loans in moderate income tracts, compared to the percentage of households at 9.0%.
- While this appears to be a very poor distribution, the AA only gained the five moderate-income tracts in 2022. Ottoville’s main office is at least 12 to 33 miles away from four of these tracts and four miles away from the closest moderate-income tract. Based on the limited time these tracts have been in AA and the distance from the main office, the geographic distribution of consumer loans in moderate-income tracts is reasonable.

**Response to Complaints**

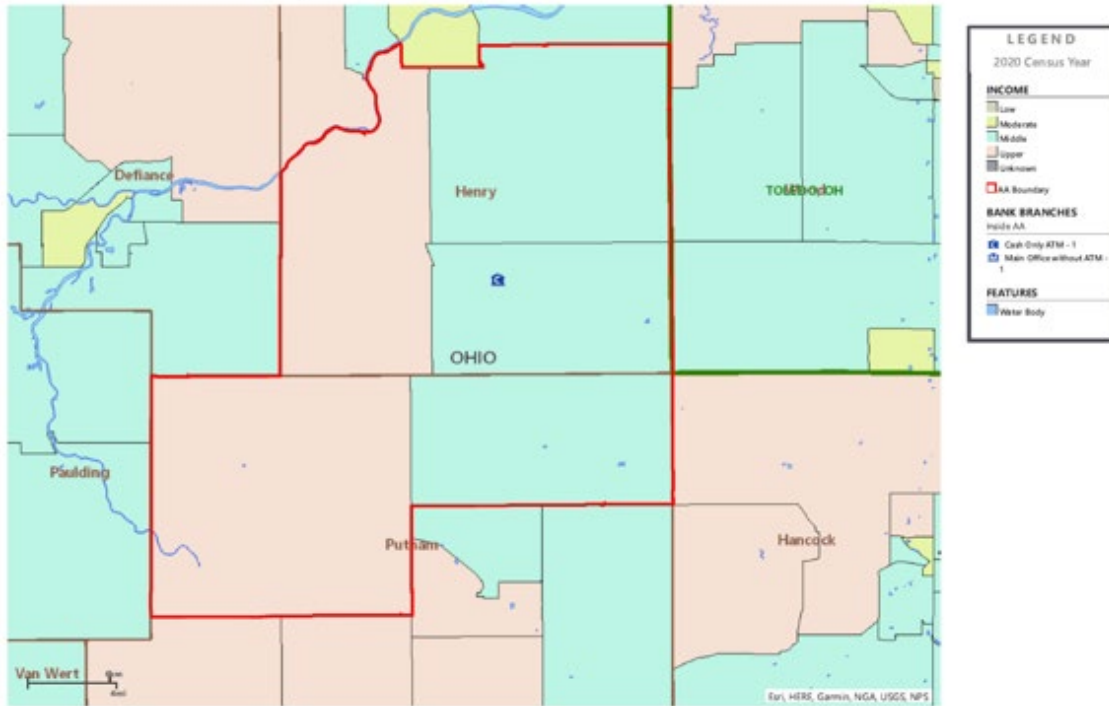
Neither Ottoville nor the Federal Reserve Bank of Cleveland received any CRA-related complaints since the previous evaluation.

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

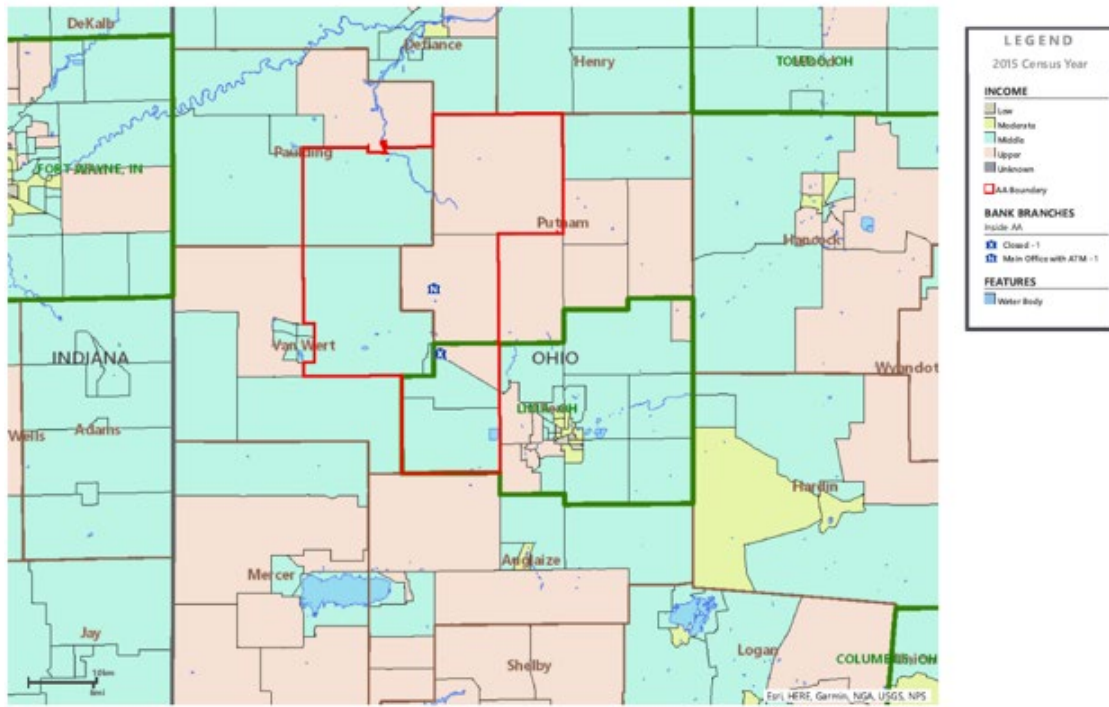
Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

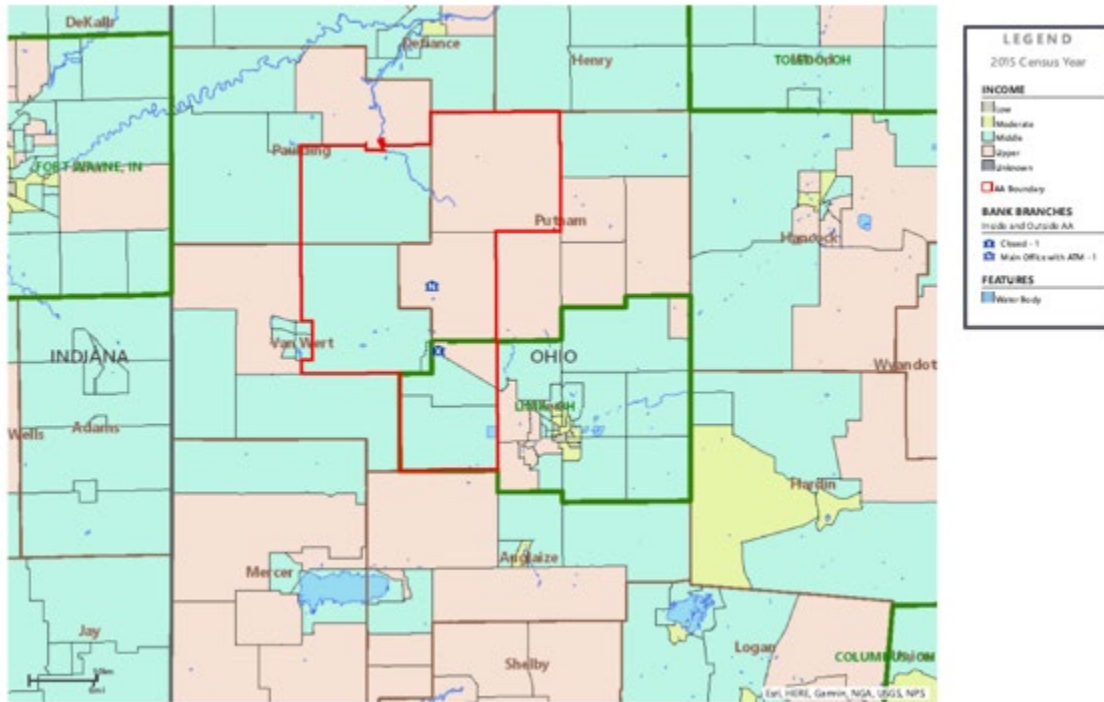
Assessment Area: 2022 Nonmetropolitan Ohio



Assessment Area: 2021 Nonmetropolitan Ohio



Assessment Area: 2020 Nonmetropolitan Ohio



APPENDIX B – DEMOGRAPHIC INFORMATION

2022 NONMETROPOLITAN OHIO AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	6,477	14.5
Moderate	5	12.2	3,480	7.8	601	17.3	7,761	17.3
Middle	28	68.3	31,527	70.4	1,958	6.2	10,407	23.2
Upper	8	19.5	9,756	21.8	462	4.7	20,118	44.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>41</b>	<b>100.0</b>	<b>44,763</b>	<b>100.0</b>	<b>3,021</b>	<b>6.7</b>	<b>44,763</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	6,280	3,158	6.3	50.3	2,574	41.0	548	8.7
Middle	48,676	35,378	70.4	72.7	9,114	18.7	4,184	8.6
Upper	14,413	11,682	23.3	81.1	1,826	12.7	905	6.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>69,369</b>	<b>50,218</b>	<b>100.0</b>	<b>72.4</b>	<b>13,514</b>	<b>19.5</b>	<b>5,637</b>	<b>8.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	642	11.1	550	10.9	80	14.8	12	7.6
Middle	3,859	67.0	3,427	67.7	330	60.9	102	64.6
Upper	1,260	21.9	1,084	21.4	132	24.4	44	27.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>5,761</b>	<b>100.0</b>	<b>5,061</b>	<b>100.0</b>	<b>542</b>	<b>100.0</b>	<b>158</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>					<b>87.8</b>		<b>9.4</b>	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	6	0.6	6	0.7	0	0.0	0	0.0
Middle	632	68.0	625	68.4	5	50.0	2	40.0
Upper	291	31.3	283	31.0	5	50.0	3	60.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>929</b>	<b>100.0</b>	<b>914</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>					<b>98.4</b>		<b>1.1</b>	
<i>Source: 2022 FFIEC Census Data 2022 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

2021 NONMETROPOLITAN OHIO AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,106	11.7
Moderate	0	0.0	0	0.0	0	0.0	1,593	16.8
Middle	5	62.5	5,456	57.6	370	6.8	2,278	24.0
Upper	3	37.5	4,021	42.4	150	3.7	4,500	47.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>8</b>	<b>100.0</b>	<b>9,477</b>	<b>100.0</b>	<b>520</b>	<b>5.5</b>	<b>9,477</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	8,140	5,944	56.2	73.0	1,428	17.5	768	9.4
Upper	5,552	4,625	43.8	83.3	689	12.4	238	4.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>13,692</b>	<b>10,569</b>	<b>100.0</b>	<b>77.2</b>	<b>2,117</b>	<b>15.5</b>	<b>1,006</b>	<b>7.3</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	661	53.7	602	55.1	45	43.3	14	41.2
Upper	570	46.3	491	44.9	59	56.7	20	58.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,231</b>	<b>100.0</b>	<b>1,093</b>	<b>100.0</b>	<b>104</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.8</b>		<b>8.4</b>		<b>2.8</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	130	51.0	129	51.8	1	20.0	0	0.0
Upper	125	49.0	120	48.2	4	80.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>255</b>	<b>100.0</b>	<b>249</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>97.6</b>		<b>2.0</b>		<b>0.4</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



2020 NONMETROPOLITAN OHIO AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,106	11.7
Moderate	0	0.0	0	0.0	0	0.0	1,593	16.8
Middle	5	62.5	5,456	57.6	370	6.8	2,278	24.0
Upper	3	37.5	4,021	42.4	150	3.7	4,500	47.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>8</b>	<b>100.0</b>	<b>9,477</b>	<b>100.0</b>	<b>520</b>	<b>5.5</b>	<b>9,477</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	8,140	5,944	56.2	73.0	1,428	17.5	768	9.4
Upper	5,552	4,625	43.8	83.3	689	12.4	238	4.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>13,692</b>	<b>10,569</b>	<b>100.0</b>	<b>77.2</b>	<b>2,117</b>	<b>15.5</b>	<b>1,006</b>	<b>7.3</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	651	52.9	590	54.0	48	44.4	13	43.3
Upper	580	47.1	503	46.0	60	55.6	17	56.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,231</b>	<b>100.0</b>	<b>1,093</b>	<b>100.0</b>	<b>108</b>	<b>100.0</b>	<b>30</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.8</b>		<b>8.8</b>		<b>2.4</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	134	50.4	133	51.0	1	25.0	0	0.0
Upper	132	49.6	128	49.0	3	75.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>266</b>	<b>100.0</b>	<b>261</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.1</b>		<b>1.5</b>		<b>0.4</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

## APPENDIX C – GLOSSARY

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

**Census tract:** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

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

**Full-scope review:** Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

**Limited-scope review:** Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

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

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

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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