# PUBLIC DISCLOSURE

January 8, 2018

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The State Bank and Trust Company RSSD #614313

401 Clinton Street Defiance, Ohio 43512

Federal Reserve Bank of Cleveland P.O. Box 6387 Cleveland, Ohio 44101-1387

NOTE:

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

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#### INSTITUTION'S CRA RATING

#### INSTITUTION'S CRA RATING: "Satisfactory"

The following table indicates the performance level of The State Bank and Trust Company with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	THE STATE BANK AND TRUST COMPANY PERFORMANCE TESTS						
	Lending Test*	Investment Test	Service Test				
Outstanding							
High Satisfactory		X					
Low Satisfactory	X		X				
Needs to Improve							
Substantial Noncompliance							

\* Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors supporting the institution's rating include:

- An adequate responsiveness to credit needs;
- A good geographic distribution of loans throughout the assessment areas;
- A good distribution of loans among borrowers of different income levels and a good distribution of loans to businesses and farms of different revenue sizes;
- An adequate level of community development loans;
- A significant level of qualified community development investments and grants;
- Retail delivery systems are not reasonably accessible to portions of geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- An adequate level of community development services.

#### **Previous Performance Evaluation**

The previous CRA examination conducted August 24, 2015 resulted in a "Needs to Improve" performance rating as a result of a substantive UDAP finding. Although the lending test was rated "High Satisfactory," the investment test was rated "Outstanding" and the service test was rated "Low Satisfactory."

#### **DESCRIPTION OF INSTITUTION**

#### **Overview**

The State Bank & Trust Company (SB&T) is headquartered and has its main office in Defiance, Ohio and is a wholly-owned subsidiary of SB Financial Group, Inc. SB&T primarily operates in Northwest Ohio and eastern Indiana. As of September 30, 2017, SB&T reported total assets of \$859.3 million.

SB&T operates 18 retail banking offices (including the main office) throughout Ohio and Indiana. SB&T also has a presence in Michigan with a loan production office (LPO) in Lambertville. ATMs are offered at 16 of the 18 retail banking offices. There are also seven additional stand-alone ATMs located in Ohio (Defiance, West Unity, and Oakwood).

Since the previous exam, LPOs have been opened in Lambertville, Michigan; Toledo and Bowling Green, Ohio; and Warsaw, Indiana. The Bowling Green LPO was converted to a full-service branch in 2016. Existing LPOs are located in Franklin County, Ohio (New Albany – Dublin converted to a full-service branch in 2015), Seneca County, Ohio (Tiffin) and Steuben County, Indiana (Angola). The existing LPOs primarily offer mortgage loans. SB&T signed a lease to open a loan production office in Westlake, Ohio in October 2017, which will also offer commercial/SBA loans.

#### Non-bank Subsidiaries

Trust and other financial services are offered through SB&T's Reliance Financial Services subsidiary. SB&T also has a non-banking affiliate, Rurbanc Data Services, Inc. (RDSI), which has historically provided item processing services to SB&T and several other institutions. However, RDSI no longer provides item processing services to SB&T. DCM, a subsidiary of RDSI, provides item processing and statement printing to 15 other banks.

#### **Business Lines**

SB&T is primarily a retail lender, offering a variety of consumer, commercial, and agricultural deposit and credit products. SB&T also offers trust services. Loan products offered include fixed- and variable-rate mortgage loans, construction loans, home equity lines of credit, secured and unsecured consumer loans, and a variety of commercial and agricultural loan products. Loans represented approximately 77.0% of SB&T's average assets as of September 30, 2017.

#### Assessment Areas

SB&T's designated assessment areas include the geographies in which its main office, branches, and deposit-taking ATMs are located, as well as the surrounding geographies in which SB&T originates or purchases a substantial portion of its loans. The following summarizes SB&T's assessment areas for this CRA performance evaluation.

#### Ohio

- Columbus OH MSA#18140
  - This assessment area consists of the entirety of Delaware, Franklin, Madison, and Union Counties.
- Lima OH MSA#3062
  - This assessment area consists of the entirety of Allen County.
- Non-metropolitan Ohio
  - This assessment area consists of the entirety of Defiance, Hancock, Henry, Paulding, Putnam, Van Wert, and Williams Counties in Ohio and one contiguous tract located Hillsdale County, Michigan. There are no branch offices in Hillsdale County.
- *Toledo OH MSA #45780* 
  - This assessment area consists of the entirety of Fulton, Lucas, and Wood Counties in Ohio and two contiguous census tracts located in Lenawee County, Michigan. There are no branch offices in Lenawee County.

#### Indiana

- Fort Wayne IN MSA#23060
  - This assessment area consists of the entirety of Allen and DeKalb Counties.

A detailed description of each assessment area is presented in subsequent sections of this performance evaluation and assessment area maps can be found in Appendix C.

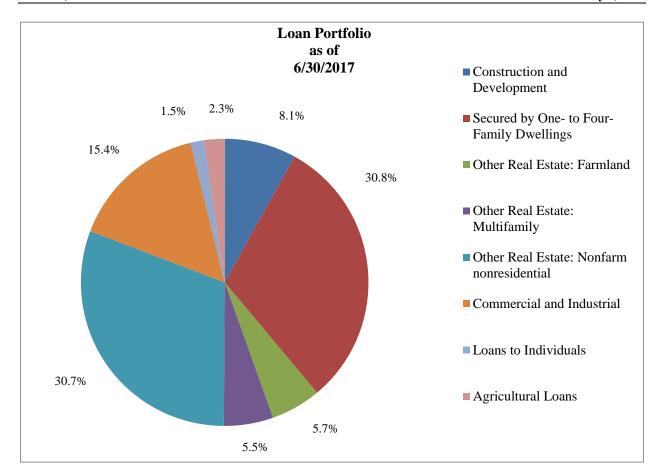
#### **Financial Overview**

SB&T offers a wide variety of consumer, residential real estate, commercial, and agricultural loan products to fulfill the credit needs of the residents and businesses in its assessment areas. Consumer loan products include auto loans, personal lines of credit, installment loans, home equity loans, mortgage loans, and credit cards. SB&T also offers construction lending and commercial loan products, including loans, lines of credit, and Small Business Administration (SBA) loans.

The following charts display SB&T's loan portfolio composition as of June 30, 2017.

COMPOSITION OF LOAN PORTFOLIO								
	6/30/20	017	12/31/2	016	12/31/2015			
Loan Type	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent		
Construction and Development	52,841	8.1%	51,419	8.0%	46,961	8.4%		
Secured by One- to Four- Family Dwellin	201,753	30.8%	194,032	30.2%	182,571	32.6%		
Other Real Estate: Farmland	36,991	5.7%	37,964	5.9%	29,556	5.3%		
Other Real Estate: Multifamily	36,113	5.5%	37,282	5.8%	39,382	7.0%		
Other Real Estate: Nonfarm nonresidentia	200,933	30.7%	195,257	30.4%	157,268	28.1%		
Commercial and Industrial	100,656	15.4%	102,269	15.9%	82,054	14.6%		
Loans to Individuals	9,974	1.5%	9,299	1.4%	8,283	1.5%		
Agricultural Loans	15,118	2.3%	14,511	2.3%	14,279	2.5%		
Total	\$654,379	100.00%	\$642,033	100.00%	\$560,354	100.00%		

<sup>\*</sup> This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.



SB&T's investment portfolio as of June 30, 2017 was \$115.2 million, which represented 15.0% of total assets. Investments in U.S. Treasuries and Agency Securities accounted for 57.6% of investments, while Municipal Securities accounted for 12.9%. The remaining percentage of investments consisted of Mortgage Backed Securities and other investments.

No known legal impediments exist that would restrain SB&T from meeting the credit needs of its assessment areas.

#### **SCOPE OF EXAMINATION**

SB&T is considered an intermediate small bank for the purposes of Regulation BB; however, management elected for SB&T's performance to be evaluated using the standards required for large banks. SB&T is subject to the Home Mortgage Disclosure Act (HMDA) and submits Community Reinvestment Act (CRA) loan data to the Federal Reserve Board of Governors annually. Due to SB&T having one branch in Fort Wayne, Indiana, it is subject to Section 109 of the Riegle-Neal Interstate Banking and Branching Efficiency Act.

For the purpose of this evaluation, SB&T had a total of five CRA assessment areas across two states. SB&T is an interstate bank; therefore, the scope of this evaluation includes a full-scope review of at least one assessment area in each state where SB&T has branches. Each assessment area was reviewed for lending, investment, and service performance utilizing either full- or limited-scope examination procedures. Three assessment areas were chosen for full-scope review. Criteria used to select full-scope assessment areas include the volume of HMDA-reportable and CRA small business lending by number of loans and dollar amount as a percentage of statewide lending activity, deposit market share, number of branches, percentage of deposits, amount of community development activity, and other non-financial considerations. Full-scope assessment areas represent the most active markets in each state based on these criteria.

The following assessment areas received full-scope reviews:

• Ohio: Columbus and Non-metropolitan Ohio

• *Indiana:* Fort Wayne

Limited-scope reviews were completed for the remaining assessment areas.

Ohio's assessment areas had the highest number of branches and largest concentration of lending and deposit activity. This area represented more than three quarters of SB&T's banking centers, ATMs, lending activity, and market share of deposits in this evaluation period. As a result, performance in these areas received the greatest weight in determining the overall rating for each test and the institution overall.

#### **Examination Evaluation Period and Products Reviewed**

This evaluation included an analysis of HMDA-reportable loans and CRA-reportable small business loans originated between January 1, 2015 and December 31, 2016. HMDA-reportable home purchase and home refinance loans and CRA-reportable small business and small farm loans were the major lending products reviewed in this evaluation. HMDA-reportable home improvement and multi-family loans were not considered in the overall evaluation due to low activity levels. Additionally, due to low activity levels, small business and small farm loans could not be evaluated in all assessment areas.

Community development loans and investments funded between August 24, 2015 and January 8, 2018 were reviewed as part of the lending and investment tests, respectively. Also, investments with community development as a primary purpose that were funded during a prior evaluation period, but still outstanding as of January 8, 2018, were also considered. Finally, community development services that occurred during the evaluation period were included in the service test evaluation.

Refer to Appendix A for a summary of the scope of the examination.

#### **Examination Analysis**

In all assessment areas, home purchase loans received the most weight based on dollar amount and volume of total loans. Refinance and small business loans received the next greatest weight based on the volume and dollar amount; however, there were insufficient numbers of small business and refinance loans to conduct a meaningful analysis in all assessment areas. Small farm lending received the least weight, as there were insufficient numbers of small farm loans to conduct a meaningful analysis in all assessment areas. Additionally, there was an insufficient volume of home improvement and multi-family to conduct meaningful analyses for these loan products during this evaluation period.

The distribution of lending to borrowers of different income levels and businesses of different revenue sizes and the geographic distribution of lending were relatively equal for low- and moderate-income census tracts and were therefore weighted equally. Columbus and Nonmetropolitan Ohio received the greatest weight due to their percentage of deposit share and loan volume concentrations. The following table illustrates the branch, deposit, and lending distribution for each assessment area.

Assessment Area	Number of	Percent of	Deposit	Loan Share	Loan Share
	Branches	Branches	Share	#	\$
Columbus MSA	1	5.3%	6.0%	45.9%	55.3%
Non-metropolitan Ohio	8	42.1%	4.5%	33.4%	25.1%
Toledo MSA	8	42.1%	58.0%	14.5%	13.8%
Fort Wayne MSA	1	5.3%	4.5%	3.9%	3.8%
Lima MSA	1	5.3%	27.0%	2.3%	2.0%
Totals	19	100.0%	100.0%	100.0%	100.0%

This evaluation of SB&T's lending record in individual assessment areas includes the utilization of and comparison to demographic characteristics. The primary sources for demographic data are the 2010 U.S. Census. Demographic characteristics of a particular assessment area are useful in analyzing a financial institution's lending record, since they provide a means of estimating loan demand and identifying lending opportunities. The data, and information about housing and economic conditions, is used to establish performance context and evaluate SB&T accordingly.

Loans are evaluated to determine the lending activity inside and outside SB&T's assessment areas. In addition, loans inside the assessment area are evaluated based on the geographic and borrower income distribution for each assessment area. The geographic distribution of HMDA loan products is assessed by comparing the percentage of loans made in each geography type (low-, moderate-, middle-, and upper-income) to the percentage of owner-occupied units in each geography type. Small business loans are compared to the percentage of small businesses within each geographic income category.

The distribution of HMDA loan products by borrower income is assessed by comparing the percentage of loans made to borrowers in each income category (low-, moderate-, middle-, and upper-income) to the percentage of families in each income category. The distribution of small business loans by borrower income is assessed by comparing the percentage of loans made to businesses in each revenue category (less than or equal to \$1 million and greater than \$1 million) to the percentage of total businesses in each revenue category.

SB&T's lending performance was also compared to the performance of aggregate lenders in 2015 and 2016; due to the timing of this evaluation, only 2015 and 2016 aggregate lending data was available. Aggregate lenders include all lenders required to report HMDA-reportable and CRA small business lending data within the respective assessment areas. Lending market share is also discussed to give a better understanding of where SB&T ranks within the respective areas. For retail services, an analysis of SB&T's branch distribution was conducted using data as of October 31, 2017.

Community development activities were reviewed to determine whether they have community development as a primary purpose and meet the geographic requirements of CRA. The eligibility of a loan, investment, or service is based on demographic information available to SB&T at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to better understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, aggregate comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area.

Finally, six community contact interviews were utilized with representatives from affordable housing, economic development, and governmental organizations operating inside SB&T's assessment areas. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the assessment area. Information obtained from these interviews helped establish a context for the communities in which SB&T operates and to gather information on its performance. Details from these interviews are presented in subsequent sections of this evaluation.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

#### **Lending Test**

SB&T's overall lending test performance is rated "Low Satisfactory." Lending performance is adequate in Ohio and the Columbus, Toledo, and Lima MSAs and good in the Nonmetropolitan Ohio assessment area. The geographic distribution of loans is good in the Nonmetropolitan Ohio assessment area and considered adequate in Ohio. The penetration of loans among borrowers of different income levels and the distribution of loans to businesses of different sizes are considered good in Ohio. Additionally, SB&T makes a relatively high level of community development loans in Ohio. Community development lending was outstanding in the Columbus and Toledo MSAs and Non-metropolitan Ohio and was adequate in the Lima MSA. As discussed earlier, SB&T's performance in Ohio had the greatest impact on its overall lending performance. Lending performance is adequate in Indiana, as is the geographic distribution of loans. The penetration of loans among borrowers of different income levels is good in Indiana. While SB&T makes a relatively high level of community development loans in Ohio, it made none in Indiana. Lending performance and the geographic distribution of loans are adequate in the Fort Wayne MSA. The penetration of loans among borrowers of different income levels is good in Fort Wayne.

While SB&T's lending distribution by geography and borrower income is referenced throughout this report, detailed information about HMDA-reportable and CRA small business loans can be found in Appendix D for full-scope and limited-scope assessment areas, respectively. In some product discussions, specific numbers are quoted from these tables to support relevant points; otherwise, general references are made about performance and the reader should refer to the appendices for specific data.

#### Lending Activity

SB&T demonstrated an adequate responsiveness to the credit needs of its assessment area, taking into consideration the institutions strategic objectives, economic conditions and competitive factors. Some communities in SB&T's assessment area continue to be impacted by challenging economic times, but are experiencing some recovery. Although SB&T operates in a highly competitive market, it was among the major HMDA lenders in Ohio; however, SB&T did not rank among the largest CRA reporters in its footprint.

The following table summarizes SB&T's lending activity. As the data shows, SB&T originated more home purchase loans than refinance loans by both number and dollar amount and originated more refinance loans than small business loans by both number and dollar amount. Due to the higher percentage of loans by number and dollar amount, HMDA-related lending typically had a greater impact on lending ratings. Lending was considered responsive to credit needs in Ohio, but SB&T exhibits a poor responsiveness to the credit needs in Indiana. Lending in Ohio was generally commensurate with deposits in Ohio; however, in the Toledo and Lima MSAs and Non-metropolitan Ohio, the percentage of deposits was more than the percentage of loans by the assessment area. For Indiana, SB&T, as a percentage, had more deposits than loans.

Of the three full-scope assessment areas, significant gaps in lending were noted in the Columbus and Fort Wayne MSAs and limited gaps were noted in Non-metropolitan Ohio. Gaps in lending can be attributed, in part, to the location of the sole branch in the Columbus and Fort Wayne MSAs.

Detailed information about lending activity can be found in the state sections of this report.

Summary of Lending Activity								
Loan Type - Description	#	%	\$(000s)	%				
Home Purchase - Conventional	1,766		327,531					
Home Purchase - FHA	376		49,962					
Home Purchase - VA	67		12,429					
Total Home Purchase	2209		389,922					
Refinancing	855		161,837					
Home Improvement	36	1	4,870					
Multi-Family Housing	7		2,933					
Total HMDA related	3,107	84.9%	559,562	84.7%				
Small Business	417		86,461					
Small Bus Secured by Real Estate	14		1,607					
Total Small Bus. related	431	11.8%	88,068	13.3%				
Small Farm	122		12,832					
Total Small Farm related	122	3.3%	12,832	1.9%				
TOTAL LOANS	3,660	100	660,462	100				

#### Assessment Area Concentration

The following table shows the number and percentage of loans located inside and outside of SB&T's assessment areas by loan type. As indicated below, SB&T originated a majority of the loans to borrowers and businesses located within its assessment areas.

#### Lending Inside and Outside the Assessment Area

#### Exam: State Bank, Defiance 2018

Loan Type - Description		Ins	side		Outside				Total		
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	\$(000s)	
CV - Home Purchase - Conventional	1,766	79.7	327,531	78.2	451	20.3	91,317	21.8	2,217	418,848	
FH - Home Purchase - FHA	376	80.2	49,962	79.6	93	19.8	12,805	20.4	469	62,767	
HI - Home Improvement	36	83.7	4,870	82.5	7	16.3	1,031	17.5	43	5,901	
MF - Multi-Family Housing	7	77.8	2,933	73.5	2	22.2	1,060	26.5	9	3,993	
RF - Refinancing	855	82.2	161,837	80.3	185	17.8	39,672	19.7	1,040	201,509	
VH - Home Purchase - VA	67	68.4	12,429	66.0	31	31.6	6,391	34.0	98	18,820	
Total HMDA related	3,107	80.2	559,562	78.6	769	19.8	152,276	21.4	3,876	711,838	
SB - Small Business	417	90.7	86,461	90.3	43	9.3	9,293	9.7	460	95,754	
SR - Small Bus Secured by Real Estate	14	93.3	1,607	94.1	1	6.7	100	5.9	15	1,707	
Total Small Bus. related	431	90.7	88,068	90.4	44	9.3	9,393	9.6	475	97,461	
SF - Small Farm	122	99.2	12,832	99.6	1	0.8	50	0.4	123	12,882	
Total Small Farm related	122	99.2	12,832	99.6	1	0.8	50	0.4	123	12,882	
TOTAL LOANS	3,660	81.8	660,462	80.3	814	18.2	161,719	19.7	4,474	822,181	

SB&T originated 80.2% of HMDA-related loans by volume and 78.6% by dollar amount and 90.7% of small business loans by volume and 90.4% by dollar amount to businesses located inside its assessment areas. This indicates SB&T's willingness to originate loans that meet the credit needs of its delineated assessment areas.

#### Distribution of Lending by Geography, Borrower Income and Business Revenue Size

Borrower and geographic distribution were equally weighted based on the overall assessment areas percentage of low- and moderate-income population at 29.1% compared to the percentage of low- and moderate-income geographies at 36.8%.

The overall geographic distribution of HMDA and small business lending reflects an adequate penetration in low- and moderate-income geographies, whereas Non-metropolitan Ohio was considered good.

The overall distribution of loans among borrowers of different income levels and to businesses of different revenue sizes is good; however, the Toledo MSA's distribution of loans among borrowers of different income levels and to businesses of different revenue sizes is adequate. HMDA-reportable lending to borrowers of different income levels is good.

HMDA-reportable and small business lending analyses within each assessment area are discussed in detail later in this report.

#### Community Development Lending

During this review period, SB&T originated 18 community development loans totaling \$12.2 million, which is considered to be an adequate level of community development loans. All 18 loans were originated in Ohio, resulting in a relatively high level of community development lending activity in Ohio. There were 11 loans originated in the Toledo MSA, which resulted in an outstanding level of community development lending activity for this area. The Columbus MSA and Non-metropolitan Ohio assessment areas also made an outstanding level of community development lending activity for these areas. One small community development loan was made in the Lima MSA that resulted in an adequate level of community development activity for this area. SB&T also originated two community development loans in Ohio, but outside of its assessment area. These two loans totaled \$980,000 with an affordable housing purpose. Finally, no community development loans were originated in Fort Wayne. The majority of the overall community development loans supported affordable housing to low- and moderate-income individuals and families, followed by community services targeted to low- and moderate-income individuals and families and revitalization efforts in low- and moderate-income areas.

Refer to the respective assessment area analyses for further details regarding community development lending.

#### Flexible Lending Programs

In addition to traditional bank products, SB&T offers and participates in flexible lending programs, such as SBA loans to small businesses, which are more complex to originate; USDA Rural Housing loans, Federal Housing Administration (FHA) and Veterans Administration (VA) loans; and Welcome Home Grants (a program that provides grant money (\$5,000 per household) to low- or moderate-income applicants to use for down payment and closing cost assistance). In addition, SB&T offers Home Possible Advantage, a conventional program requiring only a 3.0% down payment for qualified borrowers. In addition, SB&T developed an internal product, Community Home Loan, which is a special financing opportunity with no Private Mortgage Insurance (PMI) requirement if the borrower meets certain criteria, such as evidencing participation in a home ownership counseling program and contributing \$500.00 of their own funds in the transaction. These types of programs allow financial institutions to address credit needs of low- and moderate-income borrowers in a safe and sound manner and have augmented SB&T's performance within its assessment area.

More information on individual flexible lending programs can be found in the full-scope assessment area sections of this report.

#### **Investment Test**

SB&T made a significant level of qualified community development investments during the evaluation period. SB&T had excellence performance in the Columbus MSA and the highest volume of qualified community development investments were in Ohio.

Qualified investments during the current evaluation period totaled approximately \$2.8 million, with the majority supporting affordable housing through state housing fund bonds and mortgage backed securities (GNMA/FNMA). Two investments were in school district bonds, wherein more than 50% of the students receive free or reduced lunches.

Qualified investments also took the form of contributions, grants, and donations (approximately 2.8% of total investments). SB&T partners with a wide array of organizations and non-profits to fund outreach activities, educational programs, and initiatives aimed at responding to community needs, improving the financial stability of individuals and families, and revitalizing underserved communities. These contributions help to support a multitude of priority needs such as youth education, homelessness, affordable housing, small business development, financial services and education, and community services targeting low- and moderate-income individuals and communities.

Refer to the respective assessment area analysis for further details.

#### **Service Test**

Overall, SB&T's performance under the service test is rated "Low Satisfactory." In Ohio, which received the greatest weight, service performance is considered "Low Satisfactory." SB&T's service performance in Indiana is also "Low Satisfactory."

#### Retail Services

Retail delivery systems to geographic and individuals of different income levels are reasonably accessible in Non-metropolitan Ohio and the Lima MSA and not reasonably accessible in the Columbus, Toledo, and Fort Wayne MSAs. These areas include low-income and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes. The distribution of bank branches and market competition in the Columbus, Toledo, and Fort Wayne MSAs could make it difficult for SB&T to fully reach all portions of the assessment areas.

SB&T has a total of 19 branches and 25 ATMs. During the evaluation period, two LPOs were converted into branches; the Columbus MSA LPO converted to a branch in September 2015 and one Toledo MSA LPO converted to a branch in November 2017. No branches were closed. Overall, SB&T's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or low- and moderate-income individuals. A geographic distribution of SB&T's branches and ATMs as of February 27, 2017 is in Appendix E.

Banking services and business hours do not vary in a way that inconveniences any portion of SB&T's assessment area. Banking centers are generally open six days a week, with full days Monday through Friday and half days on Saturday. SB&T also operates seven LPOs, two of which are within its assessment areas in the Columbus and Toledo MSAs. The five LPOs operated outside of SB&T's assessment area are located in Lambertville, MI, Angola, IN, Warsaw, IN, Tiffin, OH, and Westlake, OH. The LPOs primarily offer mortgage, commercial, and SBA loans. SB&T also provides services through Internet banking, mobile banking, and telephone banking.

#### Community Development Services

SB&T provided an adequate level of community development services in the Columbus, Lima, and Fort Wayne MSAs. SB&T provided a relatively high level of community development services in the Toledo MSA and in Non-metropolitan Ohio. SB&T's directors, officers, and staff members provided their financial expertise to the community by engaging in activities that promoted or facilitated affordable housing, services for low- and moderate- income individuals, and economic development.

Community development services included, but were not limited to, the following:

#### Financial Education

SB&T provided financial education through partnerships with local schools, organizations, government agencies, and businesses. Examples of topics taught were financial literacy, deposit account opening, investing, risk management, and the loan application process.

#### **Board and Committee Memberships**

SB&T's employees provided financial expertise through their involvement with community development organizations throughout the assessment areas. Examples of board and committee membership positions held include directors, presidents, vice presidents, treasurers, trustees, and members.

#### Technical Assistance

The institution's employees provided technical assistance to community development and non-profit organizations. Examples of technical assistance included tax preparation, economic development, and providing financial literacy training.

#### Fair Lending or Other Illegal Credit Practices Review

A substantive violation of Section 5(a) of the Federal Trade Commission Act involving an unfair practicewas identified in the concurrent Consumer Affairs examination. The violation did not cause the CRA rating to be adjusted. The violation occurred due to a lack of oversight and insufficient compliance monitoring and testing. SB&T's management is committed to correcting the

#### STATE OF OHIO

CRA RATING FOR Ohio: "Satisfactory"
The Lending Test is rated: "Low Satisfactory"
The Investment Test is rated: "High Satisfactory"
The Service Test is rated: "Low Satisfactory"

The major factors supporting this rating include:

- An adequate responsiveness to the credit needs of the community;
- An adequate geographic distribution of loans throughout the assessment area;
- A good distribution among borrowers of different income levels and a good distribution to businesses of different revenue sizes;
- An adequate level of lending activity
- A relatively high level in making community development loans;
- A significant level of qualified community development investments and grants;
- Retail delivery systems that are not reasonably accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- An adequate level of community development services.

#### SCOPE OF EXAMINATION

Full-scope reviews were conducted for Non-metropolitan Ohio and the Columbus MSA. Limited-scope reviews were conducted for the Lima and Toledo MSAs. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the institution section of this report.

The Columbus MSA received greater weight in determining the CRA rating for Ohio. The Non-metropolitan Ohio assessment area received the next greatest weight, while the Columbus MSA had the largest lending volume. The Non-metropolitan Ohio assessment area had the largest share of deposits and number of banking centers during the evaluation period. Lastly, the Columbus MSA area represented 5.3% of banking centers, 6.0% of deposits, and 45.9% of lending in Ohio, whereas the Non-metropolitan Ohio area represented 42.1% of banking centers, 58.0% of deposits, and 33.4% of lending in Ohio.

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN OHIO

Lending activity accounted for 96.1% of SB&T's total lending activity, while deposits accounted for 95.5% of SB&T's total deposits. HMDA-reportable lending in Ohio represented 96.4% of SB&T's HMDA lending, while CRA-reportable lending represented 94.4% of SB&T's total CRA lending. As of June 30, 2017, SB&T ranked thirty-fifth among 223 insured institutions and has a deposit market share of 0.2%. As of December 31, 2017 there were 18 banking center locations within Ohio.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

#### **Lending Test**

SB&T's performance under the lending test within the assessment areas located in Ohio is rated "Low Satisfactory." SB&T's lending reflects an adequate responsiveness in the Columbus MSA, a good responsiveness to the credit needs in Non-metropolitan Ohio, and adequate responsiveness in the limited-scope assessment areas.

#### Lending Activity

SB&T originated 2,996 HMDA loans and 522 small business loans during the evaluation period in Ohio. This represents 96.1% of SB&T's total lending and is slightly less than the percentage of total deposits at 95.5% for Ohio.

Lending activity in Ohio is considered adequate. Non-metropolitan Ohio's lending activity is considered good, while the Toledo MSA's lending activity is considered poor. Lending activity in the Columbus and Lima MSAs is considered adequate.

#### Borrower and Geographic Distribution

Overall, the distribution of loans among borrowers of different income levels and to businesses of different revenue sizes is good. Distribution to borrowers of different income levels is good in the Columbus and Lima MSAs and Non-metropolitan Ohio, but adequate in the Toledo MSA.

Overall, the distribution of loans among geographies is adequate. Geographic distribution is good in Non-metropolitan Ohio, with no significant gaps identified. Geographic distribution is adequate in the Columbus and Toledo MSAs, where significant gaps were identified. Geographic distribution is adequate in the Lima MSA, with moderate gaps identified. Overall, gaps in lending may also be attributed to lower owner-occupancy rates, lower percentage of families, higher percentage of families below poverty and higher percentage of rental and vacant units, especially in low- and moderate-income areas. It is expected that lending penetration will improve as time elapses in these markets.

A detailed analysis for the borrower and geographic distribution is provided with the analysis for each assessment area.

#### Community Development Loans

In Ohio, SB&T originated 16 community development loans totaling \$11.2 million, which represented 92.0% of SB&T's community development lending by dollar volume. SB&T is a leader in making community development loans in the Columbus and Toledo MSAs and Nonmetropolitan Ohio and makes an adequate level of community development loans in the Lima MSA. Overall, SB&T makes a relatively high level of community development loans in Ohio.

#### Flexible Lending

Overall, SB&T makes extensive use of flexible lending practices within assessment areas located in Ohio.

#### **Investment Test**

SB&T's performance under the investment test within the assessment areas located in Ohio is rated "High Satisfactory." SB&T funded \$2.6 million in qualified community development investments and donations in Ohio during the evaluation period, consisting of \$1.0 million obtained from new investments made during the current review period and \$1.5 million from prior period investments. The majority of investments were mortgage backed securities (GNMA and FNMA), a New Market Tax Credit, Ohio Housing Financing Funds and school bonds. The remaining \$72,875 was from smaller dollar donations. SB&T's level of qualified investments is excellent for the Columbus MSA, significant for Non-metropolitan Ohio and the Toledo MSA, and poor for the Lima MSA.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

#### **Service Test**

SB&T's performance under the service test with the assessment areas located in Ohio is rated "Low Satisfactory." SB&T's performance was good in the Non-metropolitan Ohio assessment area and adequate in the Columbus, Toledo and Lima MSAs.

#### Retail Services

Retail delivery systems are accessible in the Lima MSA and Non-metropolitan Ohio assessment area, but not reasonably accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in the Columbus and Toledo MSAs.

SB&T's record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. SB&T converted two loan production offices to branches in Ohio since the last examination; both were in middle-income tracts and no branches were closed since the last examination.

Banking services and business hours do not vary in a way that inconveniences any portions of SB&T's assessment areas and are consistent with the services and hours discussed in the institution assessment.

#### Community Development Services

SB&T provides an adequate level of community development services in Ohio. SB&T's performance is relatively high in Non-metropolitan Ohio and the Toledo MSA and is adequate in the Columbus and Lima MSAs. In Ohio, 130 board members and staff provided 125 services.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

#### **METROPOLITAN AREAS**

(Full-scope review)

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN COLUMBUS, OHIO MSA 18140

The Columbus MSA consists of Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Morrow, Perry, Pickaway, and Union counties. SB&T's assessment area only includes the entirety of Franklin and portions of Delaware, Madison, and Union counties. This assessment area consists of a total of 317 census tracts comprised of 60 low-income census tracts (19.0%), 76 moderate-income census tracts (24.1%), 81 middle-income tracts (25.7%), and 98 upper-income tracts (31.1%). There are two tracts with unknown income; one tract contains The Ohio State University and the other contains the John Glenn Columbus International Airport. SB&T has one branch in this assessment area, located in a middle-income tract. SB&T also operates a loan production office in a middle-income tract.

Delaware County is located in central Ohio, with Marion and Morrow to the north, Knox and Licking to the east, Franklin to the south, and Union to the west. Delaware City is the largest city and county seat. The county had a population of 174,214, according to the 2010 U.S. Census, and is a mixture of cropland, forest, and developed areas.

Franklin County is located south of Delaware County. Licking and Fairfield counties border Franklin County to the east. Franklin County is bordered by Pickaway County to the south and Madison and Union counties border to the west. As of the 2010 U.S. Census, the population was 1,163,414. Its county seat is Columbus, the state capital and second-most populous city in Ohio.

Madison County is located southwest of Delaware County. Union County border Madison County to the north. Madison County is bordered by Franklin and Pickaway to the east, Fayette to the south, and Champaign and Clark to the west. London is the largest city and the county seat. The county had a population of 43,435, according to the 2010 U.S. Census, and is primarily cropland.

Union County is located west of Delaware County and consists of cropland, developed areas, forest, and pasture areas. Hardin and Marion counties border to the north, Union County is bordered by Marion and Delaware to the east, Franklin and Madison to the south, and Champaign and Logan to the west. Marysville is the largest city and county seat. The county had a population of 52,300, according to the 2010 U.S. Census.

According to the June 30, 2017 FDIC Deposit Market Share Report, SB&T ranked 29<sup>th</sup> out of 38 institutions in the market with a deposit share of 0.07% in the assessment area.<sup>1</sup> As shown in the following table, the top four largest institutions were The Huntington National Bank, JPMorgan Chase Bank, National Association, PNC Bank, National Association, and Fifth Third Bank with 36.9%, 23.0%, 9.5%, and 8.2% of the market share, respectively. Deposits in this assessment area accounted for 6.0% of SB&T's total deposits. This assessment area was the third largest in the percentage of deposits within SB&T's CRA footprint.

#	Financial Institution	Deposit Market Share
1	The Huntington National Bank	36.86%
2	JPMorgan Chase Bank, National Association	23.04%
3	PNC Bank, National Association	9.48%
4	Fifth Third Bank	8.16%
5	Nationwide Bank	7.70%
6	KeyBank National Association	2.56%
7	U.S. Bank National Association	2.04%
8	Wells Fargo Bank, National Association	1.35%
9	First Commonwealth Bank	1.09%
10	First Merchants Bank	1.03%

SB&T originated 1,613 HMDA loans (1,183 home purchase loans, 417 home refinance loans, 14 home improvement loans, and 2 multi-family) and 66 CRA loans (all were small business), which represented 51.9% and 11.9% of the total loans originated during the evaluation period, respectively. This was the largest HMDA market and third largest CRA market for loans originated during the evaluation period.

In 2016, SB&T ranked 14<sup>th</sup> among 494 HMDA reporters in the assessment area. The top four HMDA lenders in the assessment area were Union Savings Bank, Huntington National Bank, Wells Fargo Bank, and JPMorgan Chase Bank. SB&T is ranked 30<sup>th</sup> of 120 CRA reporters in the assessment area in 2016. The top four CRA lenders in the assessment area were PNC Bank, American Express Bank, Chase Bank USA and Citibank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

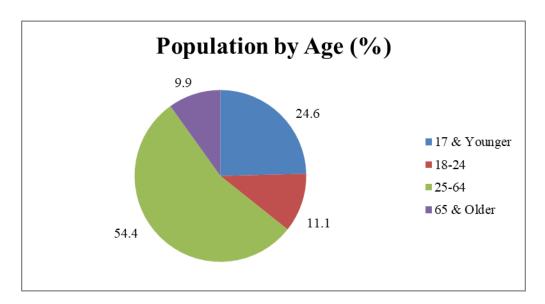
Two community contact interview were conducted to provide additional information regarding the assessment area. The first contact, representing a non-profit, community-based organization focused on social services for low- and middle-income individuals in Delaware, Madison and Union counties. This contact stated that obtaining affordable housing is a problem in all three counties served and that there are opportunities for financial institutions to receive CRA credit to provide financing for affordable housing. The contact further stated that there are many opportunities for financial institutions to provide non-traditional financial services to the low-and moderate-income individuals in these counties.

<sup>1</sup> http://www2.fdic.gov/sod/sodMarketBank.asp

The second contact, representing an economic development non-profit organization, stated that there are many opportunities for financial institutions to provide donations and operational support to aid in the organization being able to provide technical and financial assistance to start-up and existing businesses that may have difficulties qualifying for traditional bank financing.

#### **Population Characteristics**

According to the 2010 U.S. Census, the total population in the assessment area was 1,433,363. Approximately, 13.6% of the assessment area's population resides in low-income tracts and 20.4% resides in moderate-income tracts, while 28.8% reside in middle-income tracts, 36.6% in upper-income tracts, and 0.6% in the unknown income tracts. As shown in the chart below, 75.4% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 65.5% of the population is between the ages of 18 and 64 and more likely to have credit needs.



As depicted in the following table, the population in the Columbus MSA has increased. The table shows the population in the assessment area by county for 2010 and 2016<sup>2</sup> with the percentage of the population increase or decrease.

County	2010 Population	2016 Population	Population Percent Change
Delaware	174,214	196,463	12.8%
Franklin	1,163,414	1,264,518	8.7%
Madison	43,435	43,419	0.0%
Union	52,300	55,457	6.0%
Total	1,433,363	1,559,857	8.8%

The population in Madison County is relatively stable, while the population in the other three counties has increased, especially in Delaware County.

2 Population data is derived from the U.S. Census Data 2015 Statistical Abstract (enter state, county, town or zip code): https://factfinder.census.gov/faces/nav/jsf/pages/community\_facts.xhtml#

#### **Income Characteristics**

According to data from the U.S. Department of Housing and Urban Development (HUD), the 2010 median family income levels for the assessment area was \$66,518. The Columbus MSA estimated median family income levels decreased from 2015 to 2016, as detailed in the following table.<sup>3</sup>

#### Borrower Income Levels Columbus, Ohio - MSA

HUD Es tima te d Me dian Family Income			L	.ow	Moderate		Middle			Upper			
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2015	\$71,000	0	-	\$35,499	\$35,500	-	\$56,799	\$56,800	-	\$85,199	\$85,200	-	& above
2016	\$69,100	0	-	\$34,549	\$34,550	-	\$55,279	\$55,280	-	\$82,919	\$82,920	-	& above

The assessment area contains 516,227 households, of which 315,829 (61.2%) are designated as families. Low- and moderate-income families represent 21.6% and 16.3% of all families in this assessment area, respectively. Additionally, 10.8% of families live below the poverty level, compared to Ohio at 10.3%.

Based on data from the U.S. Census Bureau's Small Area Income and Poverty Estimates (SAIPE),<sup>4</sup> household poverty rates for the counties in the assessment area are as follows:

County	2014 Poverty Rate	2015 Poverty Rate
Delaware	4.80%	4.40%
Franklin	17.30%	17.10%
Madison	12.60%	9.30%
Union	7.70%	7.60%
Ohio	18.00%	14.80%
<b>United States</b>	15.50%	14.70%

All counties, with the exception of Franklin, have poverty rates that are lower than the state and nation. Franklin County's poverty rate exceeds the state and nation. The areas with relatively high poverty rates may be an indication that individuals, especially those that are low- or moderate-income, may have difficulty in having sufficient financial resources to obtain loans.

<sup>3</sup> http://www.huduser.org/portal/datasets/il/il13/index.html

<sup>4</sup> U.S. Department of Commerce: <a href="https://www.census.gov/programs-surveys/saipe.html">https://www.census.gov/programs-surveys/saipe.html</a>

#### Labor, Employment and Economic Characteristics

The following table identifies the primary employment sectors by number of employees and major employers in this assessment area, according to the Ohio Development Services Agency:<sup>5</sup>

County	Primary Employment Sectors	Major Employers
Delaware	Provessional and Business Services; Trade, Transportation and Utilities; Leisure and Hospitality; Education and Helath Services; Local Government	Delaware City School' Emerson/Liebert; JP Morgan Chase & Co; Kroger Co; McGraw Hill Companies; Mettler-Toledo International; Ohio Wesleyan University; OhioHealth/Grady Memorial Hospital; Olentangy Local Schools; PPG Industries Inc.; Showa Corp/American Showa; State of Ohio
Franklin	Trade Transportation and utilities; Professional and Business Services; Education and Health Services; Leisure and Hospitality; Financial Services	Abbott Labortories; American Electric Power Co; Battelle Memorial Institute; Cardinal Health Inc.; Huntington Bankchares Inc.; JP Morgan Chase & Co; L. Brands Inc.; Nationwide Mutual Insurance Co; Ohio State University; OhioHealth; Schottenstien Stores Corp; State of Ohio; and The Wendy's Company
Madison	Trade, Transportation and Utilities; Manufacturing; Local Government; State Government; Professional and Business Services	Battelle Memorial Institute; Kelhin Thermal Technology; Kellogg Co; G-Tekt/Jefferson Industries; London City Schools; Madison County Hospital; Nissen Chemitec; Restoration Hardware; Stanely Electric U S Co Inc; Staples Inc; State of Ohio; Target Corp
Union	Manufacturing; Professional and Business Services; Trade, Trasporation and Utilities; Local Government; Leisure and Hospitality	Honda Motor Co LTD; Marysville Exempted Village Schools; Memorial Hospital of Union County; Nestle R&D Parker Hannifin Corp; Scotts Miracle-Gro Co; State of Ohio; Union County Government; Contitech AG/Veyance Technologies Inc.

The following table illustrates the average annual unemployment rates for 2015 and 2016 for the Columbus MSA, the state and nation.

Unemployment Rates State Bank: Columbus, OH - MSA

Area	Years - Annualized				
Aita	2015	2016			
Delaware Co.	3.4	3.4			
Franklin Co.	3.8	3.8			
Madison Co.	3.7	3.7			
Union Co.	3.6	3.7			
Columbus, OH MSA	3.9	3.9			
Ohio	4.7	4.8			
National	4.8	4.5			

Not Seasonally Adjusted, Data Extracted on October 26, 2017

Unemployment rates in Union County increased slightly, while unemployment rates remained steady in the other three counties over the two-year period and all counties are below the state and national rates.

<sup>5</sup> Ohio County Profiles, Ohio Development Services Agency: <a href="https://development.ohio.gov/reports/reports\_countytrends\_map.htm">https://development.ohio.gov/reports/reports\_countytrends\_map.htm</a>

#### **Housing Characteristics**

Based on the 2010 U.S. Census, there are 585,329 housing units and 315,829 families in this assessment area. From an income perspective, 15.8% of housing units, 22.8% of owner-occupied units, and 11.0% of families are located in low-income tracts and 21.7% of housing units, 42.9% of owner-occupied units, and 20.1% of families are located in moderate-income tracts. Over half of the housing units in the low- and moderate-income census tracts are either rental or vacant (77.2% and 57.1%, respectfully). The higher number of rental and vacant units compared to the number of families in these tracts suggests there is a limited opportunity for mortgage credit in low- and moderate-income geographies.

The median age of housing stock was 36 years, according to the 2010 U.S. Census, with 17.0% of housing built prior to 1950. Within the assessment area, the median age of housing stock was 53 years in low-income tracts and 45 in moderate-income tracts. Older homes are typically more likely to require repairs and rehabilitation; therefore, this assessment area's aging housing stock could represent opportunities for SB&T to provide home improvement and rehabilitation loans in low- or moderate-income areas.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$166,298 with an affordability ratio of 31.4%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Further, based on the 2016 median family income for the Columbus MSA (\$69,100), approximately 31.0% of the homes valued up to \$126,645 in the assessment area would be considered affordable for low-income individuals and 72.5% of the homes valued up to \$202,633 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed-rate, 30-year loan.

The table below shows the median home values and associated appreciation over the prior year for the assessment area. This information obtained from Sperling's Best Places.<sup>6</sup>

County	Median Home Values	Appreciation (over prior year)
Delaware	\$271,400	4.5%
Franklin	\$139,600	4.2%
Madison	\$138,900	2.6%
Union	\$176,500	1.8%

According to the 2010 U.S. Census, the median gross rent in the assessment area was \$766, with 5.3% of the rental units having rents of less than \$350 a month. The majority of rents (59.7%) in this assessment area were greater than \$700 per month, while 7.0% of rents were \$350 to \$499 and 25.7% of rents were \$500 to \$699 per month. Approximately 35.0% of all housing units in the assessment area are rental units. Additionally, 45.8% of renters have rent costs greater than 30.0% of their income.

<sup>6</sup> Sperling's Best Places, <u>www.bestplaces.net</u>

According to Realtytrac,<sup>7</sup> an online database that tracks and provides foreclosure statistics, Delaware, Madison, and Union counties had foreclosure rates lower than the state and nation. Franklin County had foreclosure rates higher than the nation, but lower than the state. The following table shows the foreclosure filings in the assessment area, state, and nation.

County	Ratio of Properties Receiving Foreclosure Filings in October 2017
Delaware	1:2,948
Franklin	1:1,774
Madison	1:2,584
Union	1:2,969
Ohio	1:1,376
United States	1:1,903

The following table illustrates the demographics in the Columbus MSA.

<sup>7</sup> www.realtytrac.net

# **Combined Demographics Report**

Assessment Area(s): Columbus, OH MSA 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%		#	%	Families by	1ract %	#	%
Low-income	60	18.9		34,762	11	12,810	36.9	68,231	21.6
Moderate-income	76	24		63,382	20.1	11,127	17.6	51,579	16.3
Middle-income	81	25.6		91,580	29	6,935	7.6	62,053	19.6
Upper-income	98	30.9		126,105	39.9	3,279	2.6	133,966	42.4
Unknown-income	2			0	0	0	0	0	
Total Assessment Area	317	100.0	3	15,829	100.0	34,151	10.8	315,829	100.0
	Housing				Hous	ing Types by T	ract		
	Units by	C	) wner-	Occupie	d	Rental	Vacant		
	Tract		#	%	%	#	%	#	%
Low-income	92,270	2	21,027	6.7	22.8	49,612	53.8	21,631	23.4
Moderate-income	126,896		54,480	17.5	42.9	53,569	42.2	18,847	14.9
Middle-income	172,605	g	94,638	30.4	54.8	62,301	36.1	15,666	9.1
Upper-income	193,485	14	41,480	45.4	73.1	39,047	20.2	12,958	6.7
Unknown-income	73		0	0	0	73	100	0	0
Total Assessment Area	585,329	31	1,625	100.0	53.2	204,602	35.0	69,102	11.8
	Total Busines	sses by			Busines	inesses by Tract & Revenue Size			
	Tract		Less Than or =		Over \$1		Revenue Not		
	#	ul o		\$1 Million		Million # %		Reported # %	
Low-income	5,746	9.3		4,955	9	757	12.8	34	% 6.6
Moderate-income	11,134	18		9,859	17.8	1,151	19.4	124	23.9
Middle-income	16,385	26.5		14,747	26.7	1,537	25.9	101	19.5
Upper-income	28,257	45.8		25,570	46.2	2,430	41	257	49.5
Unknown-income	228	0.4		170	0.3	2,430	0.9	3	0.6
Total Assessment Area	61,750	100.0		55,301	100.0	5,930	100.0	519	100.0
Total Historian Historian	Percentage of		lusines		89.6	2,550	9.6		.8
	Total Farms by Tract			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Farms by Tract & Revenue Size				
				Less Than or = Over \$ \$1 Million Million		1 Revenue Not			
	#	%		#	%	#	%	#	%
Low-income	24	4.3		23	4.2	1	7.1	0	0
Moderate-income	32	5.7		29	5.3	3	21.4	0	0
Middle-income	199	35.7		193	35.5	6	42.9	0	0
Upper-income	301	54		297	54.7	4		0	0
Unknown-income	1	0.2		1	0.2	0	0	0	0
Total Assessment Area	557	100.0		543	100.0	14	100.0	0	.0
	Percentage of		arms:		97.5		2.5		.0

2016 FFIEC Census Data and 2016 D&B Information

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBUS OH MSA #18140

#### **Lending Test**

Lending performance in the Columbus MSA is rated "Low Satisfactory." SB&T demonstrated an adequate responsiveness to the credit needs of the community. In addition, SB&T is a leader in making community development loans. One loan was made totaling \$1.0 million in this assessment area. SB&T had an adequate geographic distribution of loans, but significant gaps in lending in low- and moderate-income tracts were identified. However, with only one branch located in a middle-income tract in the assessment area, which is some distance from the majority of low- and moderate-income tracts in the area and given banking competition in the assessment area, this could contribute to these noted gaps. SB&T has a good distribution among borrowers of different income levels and a good distribution to businesses of different revenue sizes. SB&T exhibits an adequate record of serving the credit needs of low-income individuals and businesses with gross annual revenues of \$1 million or less. SB&T made use of flexible lending programs, which augmented performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending based on overall volume, followed by refinance and small business lending. There was not enough home improvement, multi-family, or small farm loans to conduct a meaningful analysis. Further, geographic distribution received slightly more consideration to borrower distribution based on the level of low- and moderate-income tracts (42.9%) and the percentage of low- and moderate-income families (34.1%) in the assessment area.

SB&T's lending performance was compared to the 2016 aggregate performance of all lenders required to report HMDA and CRA data within the respective assessment areas. Details of SB&T's residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix D.

#### **Lending Activity**

Lending activity reflects an adequate responsiveness to the credit needs within the assessment area. SB&T originated 1,613 HMDA loans (1,183 home purchase, 417 refinance, 14 home improvement and 2 multi-family) and 66 CRA loans (all to small businesses). This represents 45.9.2% of SB&T's total lending, which is greater than the percentage of total deposits at 6.0% in this area.

#### Geographic Distribution of Lending

SB&T's overall distribution of lending among geographies is adequate. Home purchase and small business loans is considered adequate, while performance for refinance lending was poor. Significant levels of lending gaps were identified, especially in low- and moderate-income tracts as shown in the following table:

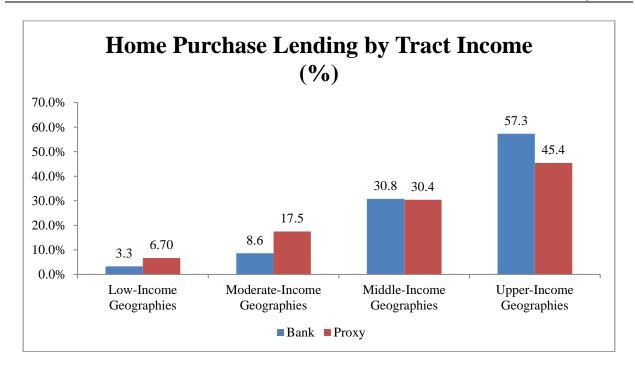
<b>Tract Income Levels</b>	Number of Tracts	Tracts with No Loans	Penetration
Low	60	36	40.0%
Moderate	76	33	56.6%
Middle	81	7	91.4%
Upper	98	0	100.0%
Unknown	2	2	0.0%
Total	317	76	75.4%

SB&T made loans in 24 out of 60 low-income census tracts (40.0%), 24 of the 76 moderate-income census tracts (56.6%), 74 of the 81 middle-income census tracts (91.4%), and in all 98 upper-income census tracts (100.0%). Overall SB&T made loans in 239 of 317 census tracts (75.4%) in the assessment area, which is considered adequate.

According to 2010 U.S. Census data, 11.0% of families reside in 60 low-income tracts in this assessment area, while 20.1% of families reside in moderate-income tracts. Families living below the poverty level comprise 37.5% of low- and 32.6% of moderate-income tracts. Further, 15.8% of all housing units are in low-income tracts and 21.7% are in moderate-income tracts. Of these units, 22.8% in low-income and 42.9% in moderate-income tracts are owner-occupied, which was lower than the overall owner-occupancy rate for the assessment area (53.2%). In addition, 77.1% of these units are rental and vacant in low-income and 57.1% are rental or vacant in moderate-income tracts. The low percentage of families residing in low- and moderate-income tracts and a lower percentage of owner-occupied housing and higher percentage of rental and vacant units could limit lending opportunities for residential mortgage loans.

#### Home Purchase Lending

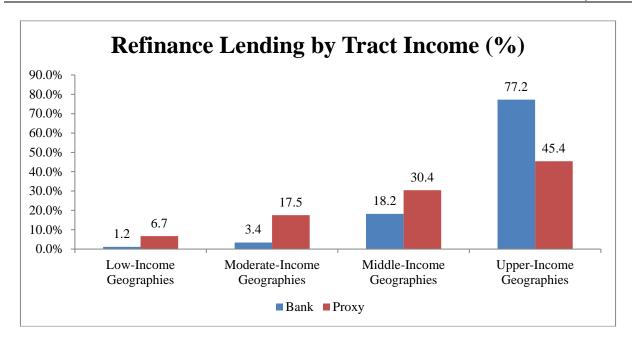
SB&T's home purchase lending was well below the percentage of owner-occupied units (proxy) in low- and moderate-income tracts. The geographic distribution of home purchase loans is considered adequate.



SB&T originated 39 home purchase loans in low-income tracts and 102 in moderate-income tracts. Although aggregate banks outperformed SB&T, SB&T's home purchase lending in low-income tracts is good in comparison with the aggregate. Home purchase lending in moderate-income tracts was well below proxy for SB&T. Although aggregate banks outperformed SB&T, SB&T's home purchase lending in moderate-income tracts is adequate in comparison with aggregate. The lack of owner-occupied units in low- and moderate-income tracts and low percentage of families could impact home purchase lending in low-income tracts. The geographic distribution for home purchase loans is considered adequate.

#### Refinance Lending

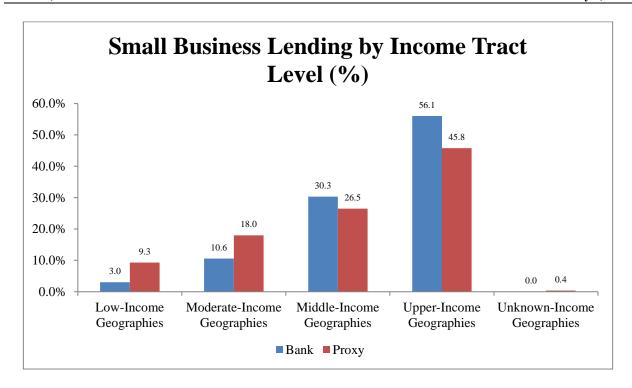
SB&T's refinance lending was significantly below the percentage of owner-occupied units (proxy) in low- and moderate-income tracts. The geographic distribution of home purchase loans is considered poor.



SB&T originated five refinance loans in low-income tracts and 14 in moderate-income tracts. Refinance lending in low- and moderate-income tracts was well below proxy for SB&T. SB&T's refinance lending in low- and moderate-income tracts compared to aggregate is poor; however, SB&T was closer to aggregate than proxy in both low- and moderate-income tracts. The lack of owner-occupied units in low- and moderate-income tracts and low percentage of families could impact refinance lending in low-income tracts. The geographic distribution for refinance loans is considered poor.

#### Small Business Lending

Small business lending was well below the percentage of small businesses located in low-income tracts and below proxy in moderate-income tracts. Overall, the geographic distribution of small business lending is poor.



SB&T originated 66 small business loans of which two were in low-income tracts and seven in moderate-income tracts. Small business lending in low-income tracts was well below proxy and considered poor. Small business lending in moderate-income tracts was below proxy in moderate-income tracts, but considered adequate. SB&T's small business lending in low- and moderate-income tracts compared to aggregate is poor. 89.6% of business in the assessment area are small businesses (< \$1 million). Of the 9.3% of total businesses in low-income tracts, 9.0% are small businesses. Of the 18.0% of total businesses in moderate-income tracts, 17.8% are small businesses. The geographic distribution for small business loans is considered poor.

#### Borrower Distribution of Lending

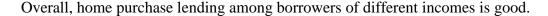
Overall, the distribution of loans is good based on borrower income and good for businesses of different revenue sizes. Borrower distribution is good for home purchase and small business with revenues less than or equal to \$1 million and adequate for refinance lending.

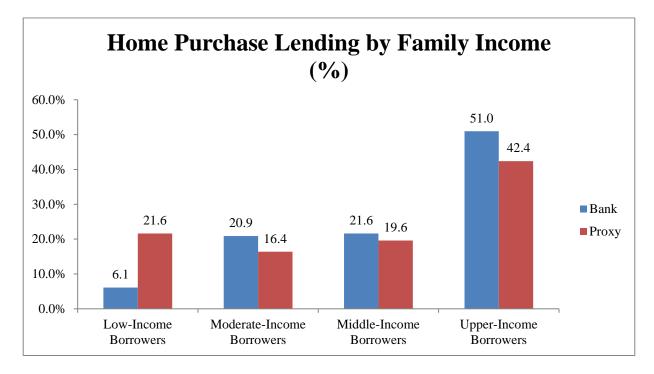
As mentioned previously, based on the 2016 median family income for the MSA, approximately 31.0% of the homes valued up to \$126,645 in the assessment area would be considered affordable for low-income individuals and 72.5% of the homes valued up to \$202,633 would be considered affordable for moderate-income individuals. Rental and vacant units make up 46.8% of the housing units in the assessment area. Low- and moderate-income families make up 34.1% of the families living in assessment area with 10.8% of families below the poverty level. These factors can limit opportunities to originate residential mortgage loans.

#### Home Purchase Lending

SB&T's performance was compared to the income levels of families in the assessment area (proxy) that are HMDA reporters. As shown in the chart below, SB&T's home purchase lending was well below proxy for low-income borrowers but above proxy for moderate-income borrowers. SB&T's lending to middle- and upper-income was also above proxy.

While SB&T originated 72 (6.1%) home purchase loans to low-income borrowers compared to the percentage (21.6%) of low-income families in the assessment area, which was considered a poor performance, SB&T's performance was good when compared with aggregate. Further, with the median housing value of \$166,298 the affordability of housing for low-income families is limited based on an affordability ratio of 31.4%. Based on this affordability ratio, only 31.0% of housing would be available to low-income borrowers up to a value of \$126,645, which is less than the median housing value. Additionally, 7.5% of the assessment area's labor force is unemployed; having high unemployment means fewer will qualify for a loan.



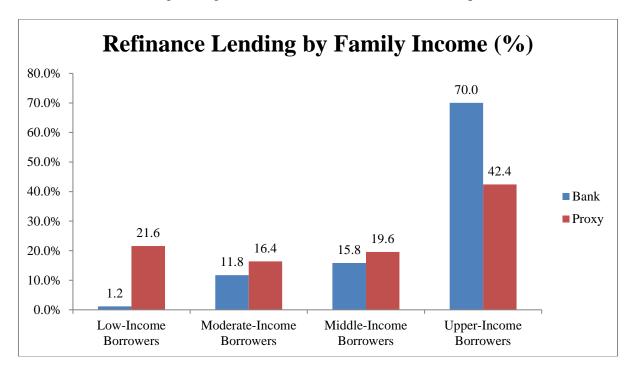


#### Refinance Lending

As shown in the chart below, SB&T's refinance lending was significantly below proxy for low-income borrowers. SB&T's refinance lending was below proxy for moderate- and slightly below for middle income borrowers. SB&T's lending was well above proxy for upper-income borrowers. SB&T's lending to low-income borrowers, while still poor, compared more favorable when compared with aggregate. SB&T's lending to moderate-income borrowers was excellent when compared with aggregate.

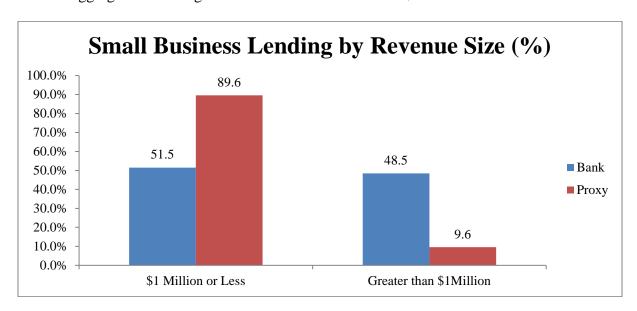
Based on the assessment area's affordability ratio (31.4%), only 31.0% of housing would be available to low-income borrowers up to a value of \$126,645, which is less than the median housing value of \$166,298.

Overall, refinance lending among borrowers of different incomes is adequate.

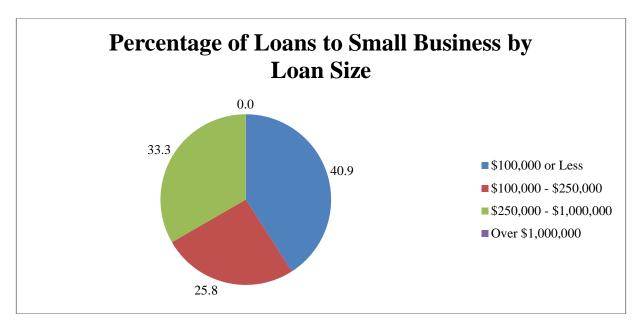


#### Small Business Lending

As depicted in the graph below, SB&T's lending to businesses with revenue of \$1 million or less is below the percentage of such businesses in the assessment area (proxy). SB&T significantly exceeded aggregate in lending to businesses with revenues of \$1 million or less.



Further analysis of small business lending shows that 40.9% of SB&T's small business loans were made for \$100,000 or less. Typically, the extent to which a bank is willing to extend loans in amounts of \$100,000 or less is reviewed because smaller businesses often have a greater need for small-dollar loans. The distribution of loans based on small business lending to businesses based on revenue size is considered good.



#### Community Development Loans

SB&T originated one community development loan in the assessment area totaling \$1.0 million. Community development lending in this assessment area represented 8.2% of the total dollar volume of community development loans originated by SB&T and represented 0.1% of SB&T's total deposits. The one loan made supported affordable housing efforts. One community contact indicated a need for affordable housing in this assessment area. SB&T faces significant competition in this assessment area; SB&T is ranked 29<sup>th</sup> out of 38 financial institutions with 0.07% of deposit market share. Overall, SB&T is a leader in making community development loans in this assessment area.

#### Flexible Lending Programs

In addition to traditional bank products, SB&T originates loans through flexible lending programs such as: the Small Business Administration (SBA) (loans to small businesses which are more complex to originate); USDA Rural Housing loans, Federal Housing Administration (FHA) and Veterans Administration (VA) loans; Welcome Home Grants (a program that provides grant money (\$5,000 per household) to low- or moderate-income applicants to use for down payment and closing cost assistance). In addition SB&T offers Home Possible Advantage, a conventional program requiring 3.0% down payment for qualified borrowers.

In addition, SB&T developed an internal product, Community Home Loan, which is a special financing opportunity with no PMI if the borrower meets certain criteria, such as evidencing participation in a home ownership counseling program and the borrower(s) must contribute \$500.00 of their own funds in the transaction. These types of programs allow financial institutions to address credit needs of low- and moderate-income borrowers in a safe and sound manner and have augmented SB&T's performance within its assessment area. SB&T worked with realtors and potential borrowers in this assessment area to educate them on these flexible lending programs.

#### **Investment Test**

SB&T made three investments totaling \$1.7 million and contributed 2 donations totaling \$2,400. The one new investment was for affordable housing. In addition, two prior period investments remain outstanding at the end of the evaluation period, with a book value of \$903,302. Of these, one was mortgage backed securities totaling \$551,294 and one was a local school district bond in the amount of \$352,008. The donations of \$2,400 were smaller dollar supporting community services including providing emotional, behavioral and mental health services for children, young adults, and low- and moderate-income families. Community development investments and donations for this assessment area represented 57.6% of the total dollar volume of community development and donations originated by SB&T, which is above the percentage of total deposits of 6.0% for this assessment area. Overall, SB&T exhibits an excellent level of qualified community development investments and donations.

#### **Service Test**

#### Retail Services

The distribution of branches is very poor in the Columbus MSA and is not reasonably accessible. SB&T does not have any branches in low-income tracts. There are 60 low-income census tracts and the percentage of families in these tracts is 11.0%. SB&T does not have any branches in moderate-income tracts. There are 76 moderate-income census tracts and the percentage of families in these tracts is 20.1%. SB&T was able to penetrate 40.0% of low- and 56.6% of moderate-income tracts. The percentage of branches in low- and moderate-income geographies did not exceeded the percentage of families residing in those geographies. SB&T did not open or close any branches in this assessment area during the evaluation period.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or families and are consistent with the services and hours discussed in the institutional assessment.

SB&T has one banking center in a middle-income tract. The proximity to low- and moderate-income tracts from this banking center may contribute to SB&Ts gaps in penetrating low- and moderate-income geographies. SB&T's one banking center in this assessment area represents 5.3% of all SB&T's banking centers overall. SB&T had one full service ATM in a middle-income census tract.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the percentage of tracts and the percentage of families living in those tracts.

Tract Income Category	Percentage of Banking Centers	Percentage of ATMs	Percentage of Tracts*	Percentage of Families in Tracts
Low	0.0%	0.0%	18.9%	11.0%
Moderate	0.0%	0.0%	24.0%	20.1%
Middle	100.0%	100.0%	25.6%	29.0%
Upper	0.0%	0.0%	30.9%	39.9%

<sup>\*</sup>The percentage of tracts includes the two unknown tracts. For analysis of lending data, unknown tracts were removed.

The branch/ATM distribution reflects a very poor dispersion within this assessment area.

### **Community Development Services**

SB&T provided an adequate level of community development services in this assessment area. Fifteen members of the board, management and staff provided community development services including serving on the board committees of 10 different organizations. These 15 employees provided 20 different services to these 10 organizations over the review period. The services made included participation in economic development efforts, providing financial services to low- and moderate income individuals, and serving on a the board of a non-profit affordable housing entity.

#### NONMETROPOLITAN STATEWIDE AREAS

(Full-scope review)

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NON-METROPOLITAN OHIO AREA

The Non-metropolitan Ohio assessment area consists of the following Ohio counties in their entireties: Defiance, Hancock, Henry, Paulding, Putnam, Van Wert, and Williams Counties, plus one tract in Hillsdale County, Michigan (non-metropolitan). SB&T does not have any branches in Hillsdale County, but the branch in Williams County is close to the Michigan state line. The assessment area was expanded to include Hancock County in February 2015. There are no low-income census tracts in this assessment area. This assessment area consists of 60 census tracts comprised of six moderate-income census tracts (10.0%), 36 middle-income tracts (60.0%), and 18 upper-income tracts (30.0%). SB&T's main office and one branch are located in the city of Defiance (Defiance County). SB&T also operates one branch in Hancock County (Findley), two branches in Paulding County (Paulding and Oakwood), and three branches in Williams County (Bryan, Montpelier, and Pioneer). The Montpelier branch is located in a moderate-income tract. The Clinton Street branch in Defiance and the Bryan branch are both located in upper-income tracts. All other branches in this assessment area are in middle-income tracts.

Defiance County is located in northeastern Ohio with Williams County to the north, Henry to the east, Paulding and Putnam to the south, and DeKalb County in Indiana to the east. Defiance is the largest city and county seat. The county had a population of 39,037, according to the 2010 U.S. Census, and is a mixture of cropland, forest, and developed areas.

Williams County is located north of Defiance County. Williams County is bordered by Hillsdale County in Michigan to the north, Fulton and Henry Counties to the east, and Steuben and DeKalb Counties in Indiana to the west. Bryan is the largest city and county seat. The county had a population of 37,642, according to the 2010 U.S. Census, and is a mixture of cropland, forest, and developed areas.

Henry County is located east of Defiance County. Henry County is bordered by Fulton County to the north, Wood County to the east, and Putnam County to the south. Napoleon is the largest city and county seat. The county had a population of 28,215, according to the 2010 U.S. Census, and is a mixture of cropland, forest, and developed areas.

Hancock County is located east of Putnam and Allen Counties and southeast of Defiance County. Hancock County is bordered by Wood County to the north, Seneca and Wyandot to the east, and Hardin to the south. Findlay is the largest city and county seat. The county had a population of 74,782, according to the 2010 U.S. Census, and is a mixture of cropland, forest, and developed areas.

Putnam County is located southeast of Defiance County. Putnam County is bordered by Henry County to the north, Hancock County to the east, Allen County to the south and Paulding and Van Wert to the west. Ottawa is the largest city and county seat. The county had a population of 34,499, according to the 2010 U.S. Census, and is a mixture of cropland, forest, and developed areas.

Van Wert County is located south of Paulding County, which is south of Defiance County. Van Wert is bordered by Putnam and Allen Counties to the east, Mercer County to the south, and Adams and Allen Counties in Indiana to the west. Van Wert is the largest city and county seat. The county had a population of 28,744, according to the 2010 U.S. Census, and is a mixture of cropland, forest, and developed areas.

Paulding County is located south of Defiance County. Paulding County is bordered by Putnam County to the east, Van Wert to the south, and Allen County in Indiana to the west. Paulding is the largest city and county seat. The county had a population of 19,614, according to the 2010 U.S. Census, and is a mixture of cropland, forest, and developed areas.

Hillsdale County in Michigan is located north of Williams County, which is north of Defiance County. Hillsdale County is bordered by Jackson County in Michigan to the north, Lenawee County in Michigan to the east, and Branch County in Michigan and Steuben County in Indiana to the west. Hillsdale is the largest city and county seat. The county had a population of 46,688, according to the 2010 U.S. Census, and is a mixture of cropland, forest, and developed areas.

According to the June 30, 2017 FDIC Deposit Market Share Report, SB&T ranked fifth out of 33 institutions in the market with a deposit share of 5.6% in the assessment area. As shown in the table below, the top four largest institutions were Wells Fargo Bank, First Federal Bank of the Midwest, The Huntington National Bank, and Fifth Third Bank with 27.8%, 14.4%, 7.8% and 6.4% of the market share, respectively. Deposits in this assessment area accounted for 58.0% of SB&T's total deposits. This assessment area was the largest in the percentage of deposits within SB&T's CRA footprint.

#	Financial Institution	Deposit Market Share
1	Wells Fargo Bank, National Association	27.78%
2	First Federal Bank of the Midwest	14.43%
3	The Huntington National Bank	7.77%
4	Fifth Third Bank	6.39%
5	The State Bank and Trust Company	5.58%
6	The Farmers & Merchants SB&T	4.01%
7	Hillsdale County National Bank	3.63%

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<sup>8</sup> http://www2.fdic.gov/sod/sodMarketBank.asp

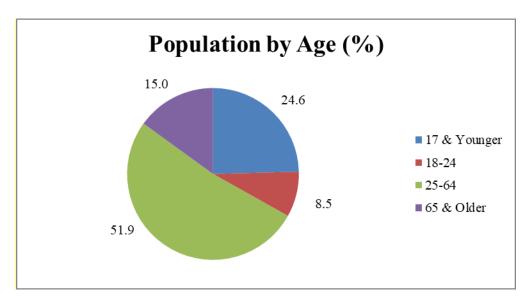
SB&T originated 929 HMDA loans (672 home purchase loans, 243 home refinance loans, and 14 home improvement loans) and 295 CRA loans (187 small business, seven small business real estate secured, and seven small farm), which represented 29.9% and 53.3% of the total loans originated during the evaluation period, respectively. This was the second-largest HMDA market and the largest CRA market for loans originated during the evaluation period.

In 2016, SB&T ranked second among 494 HMDA reporters in the assessment area. The top four HMDA lenders in the assessment area besides SB&T were First Federal Bank of the Midwest, MYCU Mortgage and Huntington National Bank. SB&T ranked 13<sup>th</sup> of 68 CRA reporters in the assessment area in 2016. The top four CRA lenders in the assessment area were Farmers & Merchant SB&T, First Federal Bank of the Midwest, American Express Bank, and Citibank.

One community contact interview was conducted to provide additional information regarding the assessment area. This contact represented a non-profit economic development organization focused on attraction and retention of businesses by being a premier reference and resource center for all businesses. The contact stated that businesses are able to obtain needed financing if they have adequate credit and cash flow, but there is a gap for the entrepreneur/startup companies that do not always have the established credit needed to qualify for financing through a traditional financial institution. The contact further stated that the area is adding jobs to its market as a result of new businesses entering the market.

#### **Population Characteristics**

According to the 2010 U.S. Census, the total population in the assessment area was 309,221. There are no low-income tracts in this assessment area. Approximately, 9.3% of the assessment area's population resides in moderate-income tracts, while 55.9% reside in middle-income tracts and 34.7% in upper-income tracts. As shown in the chart below, 75.4% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 60.4% of the population is between the ages of 18 and 64 and more likely to have credit needs.



As depicted in the following table, the population in Non-metropolitan Ohio has decreased. The table shows the population in the assessment area by county for 2010 and 2016,9 with the percentage of the population increase or decrease.

County	2010 Population	2016 Population	Population Percent Change
Hillsdale (MI)	46,688	45,774	-2.0%
Definace (OH)	39,037	38,158	-2.3%
Hancock (OH)	74,782	75,872	1.5%
Henry (OH)	28,215	27,629	-2.1%
Paulding (OH)	19,614	18,865	-3.8%
Putnam (OH)	34,499	34,056	-1.3%
Van Wert (OH)	28,744	28,362	-1.3%
Williams (OH)	37,642	37,017	-1.7%
Total	309,221	305,733	-1.1%

All counties in Non-metropolitan Ohio have had population declines.

#### **Income Characteristics**

According to data from the United States Department of Housing and Urban Development (HUD), the 2010 median family income levels for the assessment area was \$55,400. Non-metropolitan Ohio's estimated median family income levels decreased from 2015 to 2016, as detailed in the following table. <sup>10</sup>

#### Borrower Income Levels Ohio State Non-Metro

HUD Est	timated Median		L	ow	M	ode	rate	N	Mido	lle	1	Uppe	er
Fan	nily Income	0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2015	\$56,900	0	-	\$28,449	\$28,450	-	\$45,519	\$45,520	-	\$68,279	\$68,280	-	& above
2016	\$55,400	0	-	\$27,699	\$27,700	-	\$44,319	\$44,320	-	\$66,479	\$66,480	-	& above

The assessment area contains 105,340 households, of which 73,994 (70.2%) are designated as families. Low- and moderate-income families represent 15.4% and 17.1% of all families in this assessment area, respectively. Additionally, 8.4% of families live below the poverty level, compared to Ohio at 10.3%.

Based on data from the U.S. Census Bureau's Small Area Income and Poverty Estimates (SAIPE)<sup>11</sup>, household poverty rates for the counties in the assessment area are as follows:

<sup>9</sup> Population data is derived from the U.S. Census Data 2015 Statistical Abstract (enter state, county, town or zip code): <a href="https://factfinder.census.gov/faces/nav/jsf/pages/community\_facts.xhtml#">https://factfinder.census.gov/faces/nav/jsf/pages/community\_facts.xhtml#</a>

<sup>10</sup> http://www.huduser.org/portal/datasets/il/il13/index.html

<sup>10</sup> http://www.nuduser.org/portar/datasets/n/nr3/mdex.ntmi

County	2014 Poverty Rate	2015 Poverty Rate
Defiance County, OH	11.7%	10.2%
Hancock County, OH	12.7%	10.6%
Henry County, OH	10.2%	9.4%
Paulding County, OH	12.3%	10.9%
Putnam County, OH	7.8%	7.2%
Van Wert County, OH	10.1%	11.2%
Williams County, OH	14.2%	12.0%
Hillsdale County, MI	16.6%	16.6%
ОНЮ	18.0%	14.8%
MICHIGAN	16.2%	15.7%
United States	15.5%	14.7%

All counties in the Ohio portion of Non-metropolitan Ohio have poverty rates lower than the state and nation. Hillsdale County, Michigan's poverty rate is slightly higher than the state and nation and the poverty rate in Hillsdale County is higher than the other counties in Non-metropolitan Ohio. The poverty rates have declined or remained the same in all counties in Non-metropolitan Ohio from 2014 to 2015, with the exception of Van Wert County in Ohio. The areas with relatively high poverty rates may be an indication that individuals, especially those that are low- or moderate-income, may have difficulty in having sufficient financial resources to obtain loans.

### **Labor, Employment and Economic Characteristics**

The following table identifies the primary employment sectors by number of employees and major employers in this assessment area, according to the Ohio Development Services Agency: 12

<sup>12</sup> Ohio County Profiles, Ohio Development Services Agency: <a href="https://development.ohio.gov/reports/reports\_countytrends\_map.htm">https://development.ohio.gov/reports/reports\_countytrends\_map.htm</a>

County	Primary Employment Sectors	Major Employers		
Hillsdale (MI)	Manufacturing; Transportation & Warehousing; Finance and Insurance; Health Care, Social Assistance	Hillsdale College; Hillsdale Hospital; Hillsdale County Medical Care Facility; Hillsdale County; Hillsdale Community School; Bob Evans Farms Inc.; Kroger; Hillsdale Intermediate School District; City/BPU; County National Bank		
Definace (OH)	Manufacturing; Trade, Transportation and Utilities; Education and Health Servies; Local Government; Leisure and Hospitality	Definance City Schools; Mercy Definance Clinic; Defiance College; Definance Metal Products Co; Definance Regional Medical Center; General Motors Company; Johns Manville Corp; Meijer Inc; Parker Hannifin Corp		
Hancock (OH)	Manufacturing; Trade, Transportation and Utilities; Education and Health Services; Professional and Business Services; Education and Health Services; Leisure and Hospitality	Blanchard Valley Health Systesm; Consolidated Biscuit Co/Hearthside Food; Cooper Tire & Rubber Co; Findlay City Schools; Kohl's Corp; Lowe's Companies Inc; Marathon Petroleum Co LLC; Nissin Brake Ohio; Sanoh America Inc; University of Findlay; Whirlpool Corp		
Henry (OH)	Manufacturing; Local Government; Trade, Transportation and Utilities; Education and Health Services; Leisure and Hospitality	Alex Products; Campbell Soup Co; Filling Memorial Home of Mercy; Henry County Hospital; Liberty Center Schools; Lutheran Home at Napoleon; Napoleon Area City Schools; Silgan Holdings, Inc; T enneco Inc; Wal-Mart Stores Inc		
Paulding (OH)	Manufacturing; Local Government; Trade, Transportation and Utilities; Natural Resources and Mining; Education and Health Services	Alex Products Inc; Cooper Farms Inc; H E Orr Co.; InSource Technoligies; LaFarge SA; Paulding County Hospital; Paulding Exempted Village Schools; Polyone/Spartech Corp; Tem- Pace/Paragon Tempered Glass; Wayne Trace Local Schools		
Putnam (OH)	Manufacturing; Trade, Transportation and Utilities; Local Government; Education and Health Servies; Leisure and Hospitality	Kalida Manufacturing Inc; Midway Products/Progessive Stamping; Ottawa-Glandorf Local Schools; Mars Inc./Iams Co; Pro-Tec Coating Co Inc; Putnam County Government; Schnipke Engraving Co Inc; Silgan Plastics Corp; Unverferth Manufacturing Co Inc; Wal- Mart Stores Inc; Whirlpool Corp		
Van Wert (OH)	Manufacturing: Trade, Transportation and Utilities; Education and Health Services; Local Government; Leisure and Hospitality	Braun Industries Inc; Central Mutual Insurance Co; Cooper Farms Inc; Eaton Corp; Federal-Mogul Corp; Greif Inc; Toledo Molding & Die; Van Wert City Schools; Van Wert County Hospital Association; Wal-Mart Stores Inc.		
Williams (OH)	Manufacturing; Trade, Transportation and Utilities; Local Government; Education and Health Servies; Leisure and Hospitality	Allied Moulded Products; Bryan City Schools; Chase Brass & Copper; Community Hospital; ITW/Tomco Plastics; Johnson Controls Interior; Kumi Kasei/KAMCO Industries; Letts Industries/Powers & Sons; Ohio Art Co; Spangler Candy Co; Titan Tire Corp; Wal-Mart Stores Inc		

The following table illustrates the average annual unemployment rates for 2015 and 2016 for Non-metropolitan Ohio, the state, and nation.

## Unemployment Rates State Bank: Non MSA Ohio

Area	Years - A	Annualized
Area	2015	2016
Defiance Co.	4.8	4.3
Hancock Co.	3.5	3.6
Henry Co.	5.5	5.5
Paulding Co.	4.5	4.3
Putnam Co.	3.8	3.6
VanWert Co.	3.8	4.0
Williams Co.	4.1	4.1
Ohio	4.7	4.8
*Hillsdale Co.	4.1	4.2
*Michigan	4.4	4.5
National	4.8	4.5

Not Seasonally Adjusted

Data extracted on October 26, 2017

Unemployment rates in Defiance, Paulding, and Putnam Counties declined, while unemployment rates remained steady in Henry and Williams Counties. Unemployment rates in Hancock, Van Wert, and Hillsdale increased. Unemployment rates in Henry County were higher than the state and nation. The unemployment rate in Hillsdale County is lower than the state and nation. The higher percentage of unemployment rates in this area may indicate that individuals, especially those that are low- or moderate-income, may have difficulty in having sufficient financial resources to obtain loans.

## **Housing Characteristics**

Based on the 2010 U.S. Census, there are 115,257 housing units and 73,994 families in this assessment area. From an income perspective, 10.1% of housing units, 49.7% of owner-occupied units, and 8.4% of families are located in moderate-income tracts. Over half of the housing units in the moderate-income census tracts are either rental or vacant (37.6% and 12.7%, respectively). The higher number of rental and vacant units compared to the number of families in these tracts suggests there is a limited opportunity for mortgage credit in low- and moderate-income geographies.

The median age of housing stock was 47 years, according to the 2010 U.S. Census, with 35.0% of housing built prior to 1950. Within the assessment area, the median age of housing stock was 52 years in moderate-income tracts. Older homes are typically more likely to require repairs and rehabilitation; therefore, this assessment areas aging housing stock could represent opportunities for SB&T to provide home improvement and rehabilitation loans in low- or moderate-income areas.

<sup>\*</sup>Non MSA County and State, but part of this AA for this exam only

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$113,391 with an affordability ratio of 41.7%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Further, based on the 2016 median family income for Non-metropolitan Ohio (\$55,400), approximately 42.7% of the homes valued up to \$101,536 in the assessment area would be considered affordable for low-income individuals and 72.9% of the homes valued up to \$162,458 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed-rate, 30-year loan.

The table below shows the median home values and associated appreciation over the prior year for the assessment area. This information obtained from Sperling's Best Places. 13

County	Median Home Values	Appreciation (over prior year)
Defiance	\$102,000	-0.3%
Hancock	\$122,000	2.0%
Henry	\$105,100	0.8%
Paulding	\$90,100	12.5%
Putnam	\$127,600	3.9%
Van Wert	\$85,500	6.4%
Williams	\$91,400	4.2%
Hillsdale	\$103,000	2.5%

According to the 2010 U.S. Census, the median gross rent in the assessment area was \$594, with 8.5% of the rental units having rents of less than \$350 a month. The majority of rents (31.9%) in this assessment area were between \$500 to \$699 per month, while 19.3% of rents were \$350 to \$499 and 30.5% of rents were greater than \$700 per month. Approximately 20.4% of all housing units in the assessment area are rental units. Additionally, 38.1% of renters have rent costs greater than 30.0% of their income.

According to Realtytrac, 14 an online database that tracks and provides foreclosure statistics, Defiance, Putnam had foreclosure rates lower than the state. For October 2017, there were no foreclosures recorded for Henry, Paulding and Williams Counties. The foreclosure rate for Putnam County is lower than the nation. The following table shows the foreclosure filings in the assessment area, state and nation.

<sup>13</sup> Sperling's Best Places, www.bestplaces.net

<sup>14</sup> www.realtytrac.net

Geography Name	Ratio of Properties Receiving Foreclosure Filings in October 2017
Defiance, OH	1:1,879
Hancock, OH	1:1,356
Henry, OH	NA
Paulding, OH	NA
Putnam, OH	1:4,409
Van Wert, OH	1:556
Williams, OH	NA
Ohio	1:1,376
Hillsdale, MI	1:1,289
Michigan	1:3,306
United States	1:1,903

The following table illustrates the demographics in Non-metropolitan Ohio:

# **Combined Demographics Report**

Assessment Area(s): Non MSA OH 2016

Income Categories	Tract Distribut	Tract Distribution		Families ract Inco	-	Families < P Level as % Families by	6 of	Families by Family Income	
	#	%		#	%	#	%	#	%
Low-income	0	0		0	0	0	0	11,372	15.4
Moderate-income	6	10		6,235	8.4	1,224	19.6	12,664	17.1
Middle-income	36	60		41,323	55.8	3,436	8.3	16,984	23
Upper-income	18	30		26,436	35.7	1,551	5.9	32,974	44.6
Unknown-income	0	0		0	0	0	0	0	0
Total Assessment Area	60	100.0		73,994	100.0	6,211	8.4	73,994	100.0
	Housing				Hous	ing Types by T	Tract		
	Units by	C	) wner-	Occupie	d	Rental		Vacant	ţ
	Tract		#	%	%	#	%	#	%
Low-income	0		0	0	0	0	0	0	0
Moderate-income	11,585		5,759	7	49.7	4,356	37.6	1,470	12.7
Middle-income	65,831	4	46,780	57.2	71.1	12,852	19.5	6,199	9.4
Upper-income	37,841		29,258	35.8	77.3	6,335	16.7	2,248	5.9
Unknown-income	0		0	0	0	0	0	0	0
Total Assessment Area	115,257	8	1,797	100.0	71.0	23,543	20.4	9,917	8.6
	Total Busines	sses by				sses by Tract &			
	Tract			ss Than \$1 Millio	n	O ver \$1 Million	ı	Revenue l Reporte	d
	#	%		#	%	#	%	#	%
Low-income	0	0		0	0	0	0	0	0
Moderate-income	1,018	10.5		856	10.1	142	14.3	20	8.9
Middle-income	5,261	54.2		4,605	54.3	528	53.1	128	56.9
Upper-income	3,426	35.3		3,024	35.6	325	32.7	77	34.2
Unknown-income	0	0		0	0	0	0	0	0
Total Assessment Area	9,705	100.0	<u> </u>	8,485	100.0	995	100.0	225	100.0
	Percentage of		usine	sses:	87.4		10.3		2.3
	Total Farm	s by				s by Tract & I			
	Tract			ss Than \$1 Millio	n	O ver \$1 Million	ı	Revenue l Reporte	d
	#	%		#	%	#	%	#	%
Low-income	0	0		0	0	0	0	0	0
Moderate-income	16	1		15	0.9	1	8.3	0	0
Middle-income	915	56.8		908	56.8	7	58.3	0	0
Upper-income	680	42.2		676	42.3	4	33.3	0	0
Unknown-income	0	0		0	0		0	0	0
Total Assessment Area	1,611	100.0		1,599	100.0	12	100.0	0	.0
	Percentage of	Total F	arms:		99.3		.7		.0

2016 FFIEC Census Data and 2016 D&B Information

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NON-METROPOLITAN OHIO AREA

#### **Lending Test**

Lending performance in Non-metropolitan Ohio is rated "High Satisfactory." SB&T demonstrated a good responsiveness to the credit needs of the community. In addition, SB&T is a leader in making community development loans in the assessment area; three loans were made totaling \$3.7 million in this assessment area. SB&T had a good geographic distribution of loans with limited gaps in lending in moderate-income tracts. There is only one branch located in a moderate-income tract; SB&T's seven other branches in Non-metropolitan Ohio are located in middle- and upper-income tracts. There are six (10%) moderate-income tracts in Non-metropolitan Ohio. SB&T has a good distribution among borrowers of different income levels and a good distribution to businesses of different revenue sizes. SB&T exhibits a good record of serving the credit needs of low-income individuals, and businesses with gross annual revenues of \$1 million or less. SB&T made use of flexible lending programs, which augmented performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending based on overall volume, followed by refinance, small business, and small farm lending. There was not enough home improvement or multi-family loans to conduct a meaningful analysis. Further, borrower distribution received slightly more consideration to geographic distribution based on the level of moderate-income tracts (10.0%) and the percentage of low-and moderate-income families (32.5%) in the assessment area.

SB&T's lending performance was compared to 2016 aggregate performance of all lenders required to report HMDA and CRA data within the respective assessment areas. Details of SB&T's residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix D.

#### **Lending Activity**

Lending activity reflects a good responsiveness to the credit needs within the assessment area. SB&T originated 929 HMDA loans (672 home purchase, 243 refinance, and 14 home improvement) and 295 CRA loans (187 small business, seven small business real estate secured, and 101 small farm). This represents 33.4% of SB&T's total lending, which is less than the percentage of total deposits at 58.0% in this area.

### Geographic Distribution of Lending

SB&T's overall distribution of lending among geographies is good. Home purchase and small business loans is considered good and refinance was excellent, while performance for small farm lending was poor. Limited levels of lending gaps were identified in moderate-income tracts as shown in the following table:

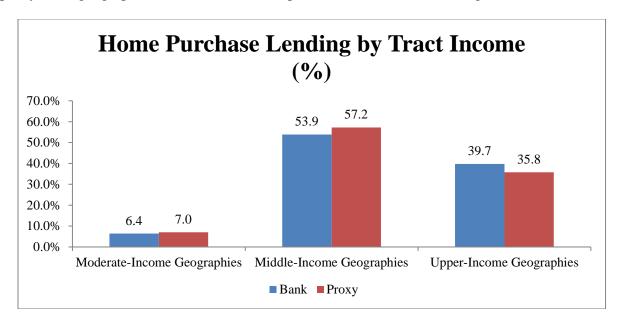
<b>Tract Income Levels</b>	Number of Tracts	Tracts with No Loans	Penetration
Low	0	NA	NA
Moderate	10	1	83.3%
Middle	36	3	91.7%
Upper	18	0	100.0%
Total	60	76	75.4%

SB&T made loans in nine out of 10 moderate-income census tracts (83.3%), 33 of the 36 middle-income census tracts (91.7%), and in all 18 upper-income census tracts (100.0%). Overall, SB&T made loans in 56 of 60 census tracts (93.3%) in the assessment area, which is considered good.

Based on 2010 U.S. Census data, housing and assessment area characteristics and assessment area include the following facts: There are no low-income tracts in this assessment area. There are 8.4% of families who reside in moderate-income tracts. Families living below the poverty level make up 19.7% of moderate-income tracts. Further, 10.1% of all housing units are in moderate-income tracts. Of these units, 49.79% in moderate-income tracts are owner-occupied, which was lower than the overall owner-occupancy rate for the assessment area (70.92%). In addition, 50.3% are rental and vacant in moderate-income tracts. The low percentage of families residing in moderate-income tracts and a lower percentage of owner-occupied housing and higher percentage of rental and vacant units could limit lending opportunities for residential mortgage loans.

#### Home Purchase Lending

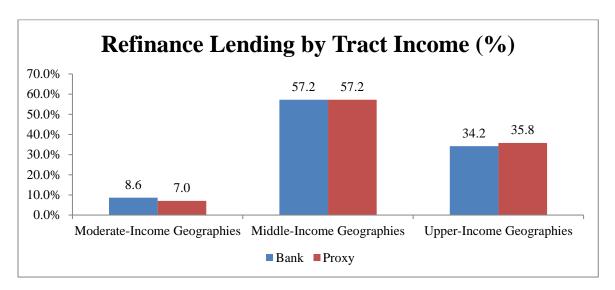
SB&T's home purchase lending was slightly below the percentage of owner-occupied units (proxy) in moderate-income tracts. SB&T's home purchase lending in middle-income tracts was slightly below proxy, while home purchase lending in upper-income tracts was slightly above proxy. The geographic distribution of home purchase loans is considered good.



SB&T originated 43 home purchase loans in moderate-income tracts. Although aggregate banks outperformed SB&T, SB&T's home purchase lending in moderate-income tracts is good in comparison with the aggregate. SB&T is a leader in HMDA lending, ranking second out of 238 HMDA market peers. The unemployment rate in all counties, but Henry is lower than the rate for the state and nation. However, the lack of owner-occupied units in moderate-income tracts and the low percentage of families could impact home purchase lending in moderate-income tracts. The geographic distribution for home purchase loans is considered good.

#### Refinance Lending

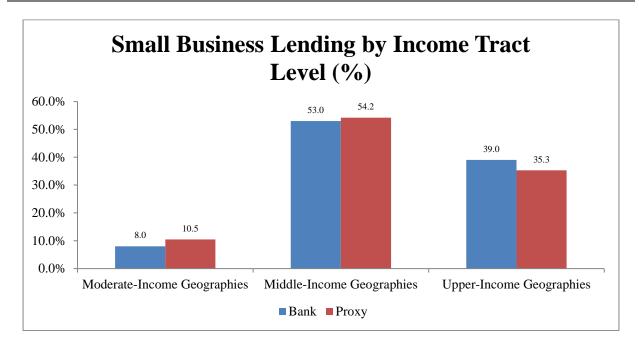
SB&T's refinance lending was above the percentage of owner-occupied units (proxy) in moderate-income tracts. SB&T's refinance lending was equivalent to proxy in middle-income tracts, but slightly below proxy in upper-income tracts. The geographic distribution of refinance loans is considered excellent.



SB&T originated 21 refinance loans in moderate-income tracts. Refinance lending in moderate-and middle-income tracts was slightly above aggregate. When compared with the aggregate, refinance lending in upper-income tracts, while considered good, was below proxy. The unemployment rate for the moderate-income tracts is 12.7% which is higher than the unemployment rate in the state (11.5% in Michigan and 8.6% in Ohio). The lack of owner-occupied units in low- and moderate-income tracts and low percentage of families could impact refinance lending in low-income tracts. The geographic distribution for refinance loans is considered excellent.

#### Small Business Lending

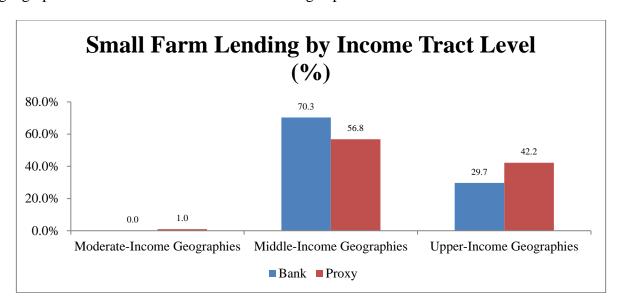
Small business lending was slightly below the percentage of small businesses (proxy) located in moderate-income tracts. Small business lending in middle-income tracts was also slightly below proxy, while small business lending in upper-income tracts was slightly above proxy. Overall, the geographic distribution of small farm lending is good.



SB&T originated 187 small business loans, of which 15 were in moderate-income tracts. Small farm lending in moderate-income tracts was slightly below proxy and considered good. SB&T's small business lending in moderate-income tracts compared to aggregate is good, as 87.4% of the businesses in the assessment area are small businesses of less than \$1 million. Of the 10.5% of total businesses in moderate-income tracts, 10.1% are small businesses. The geographic distribution for small farm loans is considered good.

#### Small Farm Lending

Small farm lending was significantly below the percentage of small farms (proxy) located in moderate-income tracts. Small farm lending in middle-income tracts was also slightly above proxy, while small farm lending in upper-income tracts was below proxy. Overall, the geographic distribution of small business lending is poor.



SB&T did not originate any small farm loans in moderate-income tracts. Small farm lending in moderate-income tracts was significantly below proxy and considered poor. SB&T's small business lending in moderate-income tracts compared to the aggregate is also poor, as 99.3% of farms in the assessment area are small farms of less than \$1 million. Of the 1.0% of total farms in moderate-income tracts, 0.9% are small farms. In Van Wert County, 87.0% of the land is cropland. There are two moderate-income tracts in Van Wert County. There is one moderate-income tract in Williams County with 59.5% cropland. The two moderate-income tracts in Hancock and one in Defiance County do not appear to contain farm land. The geographic distribution for small business loans is considered poor.

#### Borrower Distribution of Lending

Overall, the distribution of loans is good based on borrower income and good for businesses of different revenue sizes. Borrower distribution is considered good for home purchase, small business, and small farms with revenues less than or equal to \$1 million and considered adequate for refinance lending.

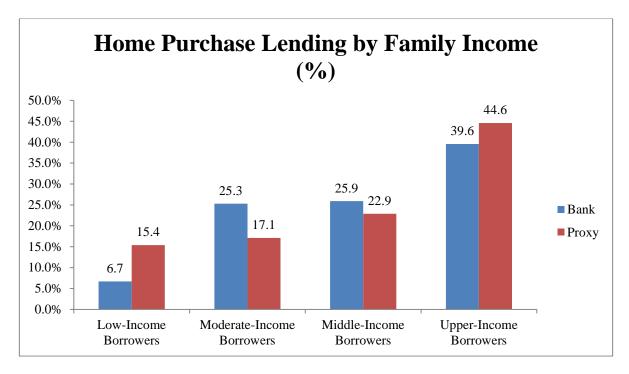
As mentioned previously, based on the 2016 median family income for Non-metropolitan Ohio, approximately 42.7% of the homes valued up to \$101,536 in the assessment area would be considered affordable for low-income individuals and 72.9% of the homes valued up to \$162,458 would be considered affordable for moderate-income individuals. Rental and vacant units make up 29.0% of the housing units in the assessment area. Low- and moderate-income families make up 32.5% of the families living in assessment area, with 8.4% of families below the poverty level. These factors can limit opportunities to originate residential mortgage loans.

#### Home Purchase Lending

SB&T's performance was compared to the income levels of families in the assessment area (proxy) that are HMDA reporters. As shown in the following chart, SB&T's home purchase lending was well below proxy for low-income borrowers, but above proxy for moderate-income borrowers. SB&T's lending to middle-income borrowers was also excellent, while lending to upper-income borrowers was good.

While SB&T originated 45 (6.7%) home purchase loans to low-income borrowers compared to the percentage (15.4%) of low-income families in the assessment area, which was considered a poor performance, SB&T's performance was excellent when compared with the aggregate. SB&T originated 170 home purchase loans to moderate-income borrowers compared to the percentage (17.1%) of moderate-income families in the assessment area, which is excellent. SB&T's performance to moderate-income borrowers when compared with the aggregate was also excellent. The median housing value is \$113,391. The affordability of housing for low-income families is limited based on an affordability ratio of 31.4%. Based on this affordability ratio, only 42.7% of housing would be available to low-income borrowers up to a value of \$101,536, which is less than the median housing value. Additionally, as 8.1% of the assessment area's labor force is unemployed, the high unemployment percentage means that fewer individuals will qualify for a loan.

Overall, home purchase lending among borrowers of different incomes is good.

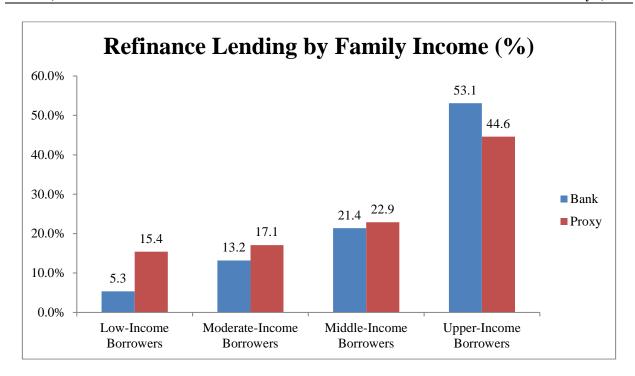


## Refinance Lending

As shown in the following chart, SB&T's refinance lending was well below proxy for low-income borrowers. SB&T's refinance lending was below proxy for moderate-income borrowers. Refinance lending to middle-income borrowers was good and was excellent for upper-income borrowers.

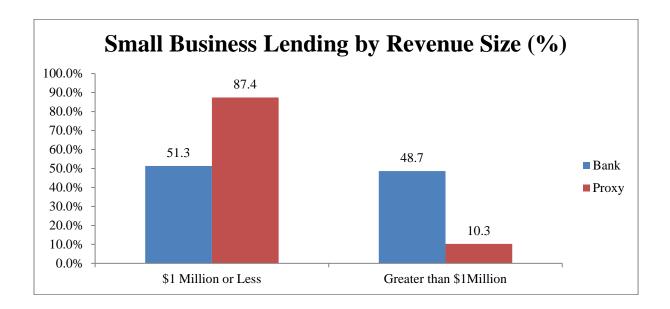
SB&T's refinance lending to low-income borrowers when compared with the aggregate was good. SB&T's refinance lending to moderate-income borrowers when compared with the aggregate was adequate. SB&T's refinance lending to middle-income borrowers when compared with the aggregate was excellent. Based on the assessment area's affordability ratio of 41.7%, only 42.7% of housing would be available to low-income borrowers up to a value of \$101,536, which is less than the median housing value of \$113,391.

Overall, refinance lending among borrowers of different incomes is adequate.

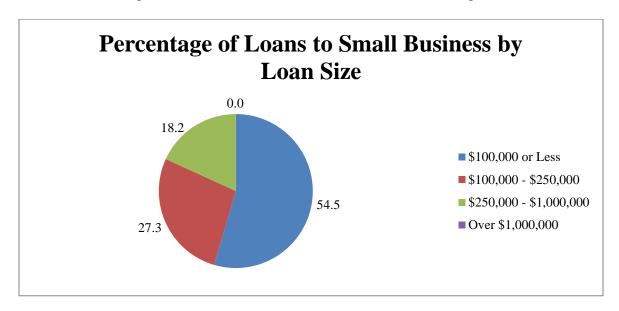


Small Business Lending

As depicted in the graph below, SB&T's lending to businesses with revenue of \$1 million or less is below the percentage of such businesses in the assessment area (proxy). SB&T exceeded the aggregate in lending to businesses with revenues of \$1 million or less.

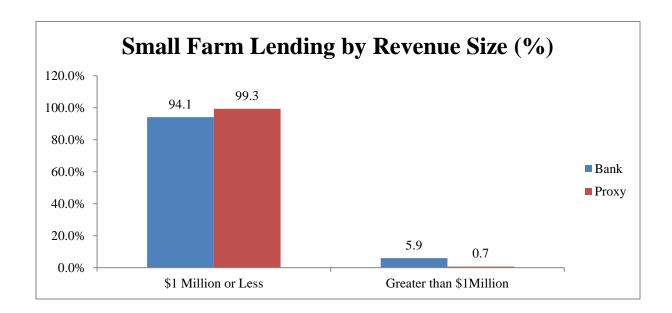


Further analysis of small business lending shows that 54.5% of SB&T's small business loans were made for \$100,000 or less, as depicted in the chart below. Typically, the extent to which a bank is willing to extend loans in amounts of \$100,000 or less is reviewed because smaller businesses often have a greater need for small-dollar loans. The distribution of loans based on small business lending to businesses based on revenue size is considered good.

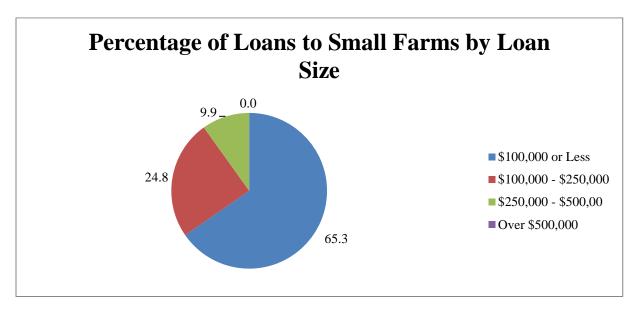


### Small Farm Lending

As depicted in the following graph, SB&T's lending to farms with revenue of \$1 million or less is slightly below the percentage of such farms in the assessment area (proxy). SB&T exceeded aggregate in lending to farms with revenues of \$1 million or less.



Further analysis of small farm lending shows that 65.3% of SB&T's small farm loans were made for \$100,000 or less, as depicted in the chart below. Typically, the extent to which a bank is willing to extend loans in amounts of \$100,000 or less is reviewed because smaller farms often have a greater need for small-dollar loans. The distribution of loans based on small farm lending to farms based on revenue size is considered good.



#### Community Development Loans

SB&T originated three community development loans totaling \$3.7 million in the assessment area. Community development lending in this assessment area represented 30.5% of the total dollar volume of community development loans originated by SB&T and 0.5% of SB&T's total deposits. One loan supported revitalization in a moderate-income geography and two loans provided services to low- and moderate-income individuals. SB&T faces some competition in this assessment area, as SB&T is ranked fifth out of 33 financial institutions, but only has 5.6% of the deposit market share. Overall, SB&T is a leader in making community development loans in this assessment area.

#### Flexible Lending Programs

In addition to traditional bank products, SB&T originates loans through flexible lending programs such as SBA loans to small businesses, which are more complex to originate; USDA Rural Housing loans, Federal Housing Administration (FHA) and Veterans Administration (VA) loans; and Welcome Home Grants (a program that provides grant money (\$5,000 per household) to low- or moderate-income applicants to use for down payment and closing cost assistance). In addition, SB&T offers Home Possible Advantage, a conventional program requiring 3.0% down payment for qualified borrowers. In addition, SB&T developed an internal product, Community Home Loan, which is a special financing opportunity with no PMI if the borrower meets certain criteria, such as evidencing participation in a home ownership counseling program and contributing \$500.00 of their own funds in the transaction.

These types of programs allow financial institutions to address credit needs of low- and moderate-income borrowers in a safe and sound manner and have augmented SB&T's performance within its assessment area.

#### **Investment Test**

SB&T made one investment totaling \$324,828 and contributed 25 donations totaling \$57,440. There were no new investments in this assessment area during this review period. The prior period investment was called on June 1, 2016 and had a book value of \$324,828. The investment was for a local school district bond. The donations of \$57,550 were smaller dollar donations supporting community services, including providing emotional, behavioral, and mental health services for children, young adults, and low- and moderate-income families. Community development investments and donations for this assessment area represented 13.2% of the total dollar volume of community development and donations originated by SB&T, which is below the percentage of total deposits of 58.0% for this assessment area. Overall, SB&T exhibits a significant level of qualified community development investments and donations.

#### **Service Test**

#### Retail Services

The distribution of branches is excellent in Non-metropolitan Ohio and the branches are reasonably accessible. There are no low-income tracts in this assessment area. SB&T has one branch in a moderate-income tract. There are six (10.0%) moderate-income census tracts and the percentage of families in these tracts is 8.4%. SB&T was able to penetrate 83.3% of moderate-income tracts. The percentage of branches in moderate-income geographies (12.5%) exceeded the percentage of families residing in those geographies. SB&T did not open or close any branches in this assessment area during the evaluation period.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or families, and are consistent with the services and hours discussed in the institutional assessment.

SB&T has one banking center in a moderate-income tract, five in middle- and two in upper-income tracts. Banking centers in this assessment area represent 42.1% of all SB&T's banking centers overall. SB&T had two full-service ATMs in moderate-income census tracts, nine in middle-, and four in upper-income census tract.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the percentage of tracts and the percentage of families living in those tracts.

Tract Income Category	Percentage of Banking Centers	Percentage of ATMs	Percentage of Tracts	Percentage of Families in Tracts
Moderate	12.5%	13.3%	10.0%	8.4%
Middle	62.5%	60.0%	60.0%	55.9%
Upper	25.0%	26.7%	30.0%	35.7%

The branch/ATM distribution reflects an excellent dispersion within this assessment area.

## Community Development Services

SB&T provided a relatively high level of community development services in this assessment area, as 61 members of the board, management, and staff provided community development services including serving on board committees of 23 different organizations. These 61 employees provided 61 different services to these 23 organizations over the review period, including participation in economic development efforts, providing financial services to low- and moderate-income individuals, and serving on a the board of a non-profit affordable housing entity.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LIMA, OHIO MSA #30620

(Limited-scope Review)

The Lima MSA consists of Allen County, Ohio. Of the 33 census tracts in the Lima MSA, five are low- (15.2%), six are moderate- (18.2%), 16 are middle- (48.5%), and six are upper-income (18.2%).

SB&T operates one branch in the assessment area, representing 5.3% of SB&T's total branches and 5.6% of its branches in Ohio. SB&T also operates one ATM in the Lima MSA. Both the branch and the ATM are located in a low-income tract.

As of June 30, 2017, SB&T had \$32.1 million in deposits in this assessment area, representing a market share of 1.7% and 4.5% of its statewide deposits. SB&T is ranked 10<sup>th</sup> out of 11 institutions in the Lima MSA.

Between January 1, 2015 and December 31, 2016, SB&T originated 67 HMDA loans, 18 small business loans, and one community development loan in the Lima MSA. Based on SB&T's lending volume, a limited-scope review was conducted in this assessment area.

Details of SB&T's residential mortgage and small business lending and lending by peers can be found in Appendix D.

# **Combined Demographics Report**

Assessment Area(s): Lima, OH MSA 2016

Income Categories	Tract Distribut			-	Families < P Level as % Families by	6 of	Families Family Inc				
	#	%		#	%	#	%	#	%		
Low-income	5	15.2	15.2 2,373		8.5	923	38.9	5,960	21.5		
Moderate-income	6	18.2		3,434	12.4	882	25.7	4,848	17.5		
Middle-income	16	48.5		13,728	49.4	1,270	9.3	6,217	22.4		
Upper-income	6	18.2		8,234	29.7	269	3.3	10,744	38.7		
Unknown-income	0	0		0	0	0	0	0	0		
Total Assessment Area	33	100.0		27,769	100.0	3,344	12.0	27,769	100.0		
	Housing				Hous	ing Types by T	Tract				
	Units by	C	wner-	Occupie	d	Rental		Vacant			
	Tract		#	%	%	#	%	#	%		
Low-income	4,765		1,622	5.6	34	2,151	45.1	992	20.8		
Moderate-income	6,812		3,024	10.4	44.4	2,634	38.7	1,154	16.9		
Middle-income	22,008	14,870		51.3	67.6	5,283	24	1,855	8.4		
Upper-income	11,504		9,470		82.3	1,665	14.5	369	3.2		
Unknown-income	0	0		0	0	0	0	0	0		
Total Assessment Area	45,089	2	8,986	100.0	64.3	11,733	26.0	4,370	9.7		
	Total Busines	Total Businesses by			·						
	Tract			ss Than \$1 Millio		O ver \$1 Million		Revenue l Reporte			
	#	%		#	%	#	%	#	%		
Low-income	571	14.9		481	14.2	86	21.1	4	10.3		
Moderate-income	422	11		351	10.4	68	16.7	3	7.7		
Middle-income	1,828	47.8		1,633	48.4	169	41.4	26	66.7		
Upper-income	1,003	26.2		912	27	85	20.8	6	15.4		
Unknown-income	0	0		0	0	0	0	0	0		
Total Assessment Area	3,824	100.0		3,377	100.0	408	100.0	39	100.0		
	Percentage of	Total B	usine	inesses: 88.3 10.7					1.0		
	Total Farm	s by		Farms by Tract & Revenue Size							
	Tract		-	ss Than \$1 Millio	-	Over \$1 Million		Revenue l Reporte			
	#	%		#	%	#	%	#	%		
Low-income	0	0	(		0	0	0	0	0		
Moderate-income	1	0.4		1	0.4	0	0	0	0		
Middle-income	205	83.3	203		83.2	2	100	0	0		
Upper-income	40	16.3		40	16.4		0	0	0		
Unknown-income	0	0		0	0	0	0	0	0		
Total Assessment Area	246	100.0		244	100.0	2	100.0	0	.0		
	Percentage of	Total F	arms:		99.2		.8		.0		

2016 FFIEC Census Data and 2016 D&B Information

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LIMA, OHIO MSA #30620

Through the use of available facts and data, including performance and demographic information, the Lima MSA's performance was evaluated and compared with SB&T's performance in the state. The conclusions regarding performance are provided in the tables below.

Assessment Area	<b>Lending Test</b>	<b>Investment Test</b>	Service Test
Lima OH MSA	Consistent	Below	Above

For the lending test, SB&T received a "Low Satisfactory" rating in Ohio. Performance in the Lima MSA limited-scope area was consistent with SB&T's performance for the state.

Lending levels were adequate for geographic distribution of loans and good for borrower distribution of loans in this area. SB&T made an adequate level of community development loans in the Lima MSA. Overall, gaps in lending were not significant. SB&T's penetration rate in the Lima MSA was 84.8%; however, 20.0% of low- and 33.3% of moderate-income tracts were not penetrated.

Although SB&T originated one community development loan, it did not make any community development investments, but made a few donations, resulting in the investment test being below the performance of SB&T's overall state performance. SB&T provided an adequate level of community development services in the Lima MSA. The Lima MSA's overall service test is good as a result of SB&T having its branch accessible to low- and moderate-income individuals by being located in a low-income tract.

The Lima MSA has five low-income census tracts (15.2%). In the low-income census tracts, 45.1% of the housing units are rental and 20.8% are vacant. There are six moderate-income census tracts (18.2%) in the Lima MSA, of which 38.7% of the housing are rentals and 16.9% are vacant. The percentage of households below the poverty level in the Lima MSA (14.6%) is higher than the state (13.7%) and the percentage of families below the poverty level in the Lima MSA (12.0%) is also higher than the state (10.3%). The unemployment rate in the Lima MSA is 10.1%, which is higher than the state unemployment rate of 8.6% and can limit opportunities to originate residential mortgage loans.

The performance in the Lima MSA limited-scope assessment area did not change the overall state rating.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TOLEDO, OHIO MSA #45780

(Limited-scope Review)

The Toledo MSA assessment area consists of the entire Toledo, Ohio MSA, which includes Fulton, Lucas, and Wood counties, plus two tracts in Lenawee County, Michigan (non-metropolitan). SB&T does not have any branches in Lenawee County, but the branch in Fulton County is close to the Michigan state line. Of the 167 census tracts in the Toledo MSA, there are 27 low- (16.2%), 30 moderate- (18.0%), 72 middle- (43.1%) and 36 high-income census tracts (21.6%) in the assessment area. There are also two unknown-income tracts (1.2%) that include Bowling Green University and Lake Erie.

SB&T operates eight branches in the assessment area, representing 42.1% of SB&T's total branches and 44.4% of its branches in Ohio. There are three branches in Fulton County, four branches in Wood County, and one branch in Lucas County. SB&T also operates seven ATMs in the Toledo MSA, six located in middle-income census tracts and one located in an upper-income census tract. SB&T opened two loan production offices within the Toledo MSA since the prior examination. An LPO was opened in Toledo (Lucas County) in June 2016 and another was opened in Bowling Green (Wood County) in August 2016 that was converted to a full-service branch in November 2017. In the Toledo MSA, none of SB&T's branches are located in a low- or moderate-income census tract. Seven branches are in middle-income tracts and one is in an upper-income tract. The LPO in the city of Toledo is located in a low-income tract.

As of June 30, 2017, SB&T had \$192.0 million in deposits in this assessment area, representing a market share of 1.7% and accounting for 15.0% of its statewide deposits. SB&T is ranked 11<sup>th</sup> out of 26 institutions in the Toledo MSA.

Between January 1, 2015 and December 31, 2016, SB&T originated 387 HMDA loans (12.5% of SB&T's total HMDA loans), 143 small business loans (25.9% of SB&T's total small business loans), and 11 community development loans (61.1% of SB&T's total community development loans) in the Toledo MSA. Based on SB&T's lending volume, a limited-scope review was conducted in this assessment area.

Details of SB&T's residential mortgage and small business lending and lending by peers can be found in Appendix D.

# **Combined Demographics Report**

Assessment Area(s): Toledo OH MSA 2016

Income Categories	Tract Distribut				-	Families < P Level as % Families by	6 of	of Family Income		
	#	%	% #		%	#	%	#	%	
Low-income	27	16.2	13,612		8.7	5,839	42.9	34,017	21.8	
Moderate-income	30	18		22,795	14.6	4,869	21.4	26,514	17	
Middle-income	72	43.1		73,207	46.9	6,201	8.5	32,024	20.5	
Upper-income	36	21.6		46,344	29.7	1,800	3.9	63,412	40.7	
Unknown-income	2	1.2		9	0	9	100	0	0	
Total Assessment Area	167	100.0	1	55,967	100.0	18,718	12.0	155,967	100.0	
	Housing				Hous	ing Types by T	Tract			
	Units by	C	) wner-	Occupie	d	Rental		Vacant	ţ	
	Tract		#	%	%	#	%	#	%	
Low-income	29,729		9,428	5.7	31.7	14,002	47.1	6,299	21.2	
Moderate-income	50,186	2	20,988	12.7	41.8	21,748	43.3	7,450	14.8	
Middle-income	126,707	8	82,152	49.6	64.8	33,423	26.4	11,132	8.8	
Upper-income	69,199	,	52,928	32	76.5	11,902	17.2	4,369	6.3	
Unknown-income	129	0 0		0	110	85.3	19	14.7		
Total Assessment Area	275,950	16	5,496	100.0	60.0	81,185	29.4	29,269	10.6	
	Total Busines	Total Businesses by			Businesses by Tract & Revenue Size					
	Tract			ss Than \$1 Millio		O ver \$1 Million		Revenue l Reporte		
	#	%		#	%	#	%	#	%	
Low-income	1,423	6.3		1,206	6.1	211	8.6	6	2.7	
Moderate-income	3,050	13.5		2,631	13.2	399	16.2	20	9	
Middle-income	10,314	45.8		9,097	45.8	1,096	44.5	121	54.8	
Upper-income	7,732	34.3		6,907	34.8	752	30.6	73	33	
Unknown-income	21	0.1		17	0.1	3	0.1	1	0.5	
Total Assessment Area	22,540	100.0		19,858	100.0	2,461	100.0	221	100.0	
		Percentage of Total Businesses:				88.1 10.9				
	Total Farm	s by				s by Tract & I				
	Tract			ss Than \$1 Millio	n	O ver \$1 Million	ı	Revenue l Reporte	d	
	#	%		#	%	#	%	#	%	
Low-income	2	0.3		1	0.1	1	6.3	0	0	
Moderate-income	9	1.3		7	1	2	12.5	0	0	
Middle-income	518	72.9		508	73.1	10	62.5	0	0	
Upper-income	182	25.6		179	25.8	3	18.8	0	0	
Unknown-income	0	0		0	0	0	0	0	0	
Total Assessment Area	711	100.0		695	100.0	16	100.0	0	.0	
	Percentage of	Total F	arms:		97.7		2.3		.0	

2016 FFIEC Census Data and 2016 D&B Information

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TOLEDO, OHIO MSA #45780

Through the use of available facts and data, including performance and demographic information, the Toledo MSA's performance was evaluated and compared with SB&T's performance in the state. The conclusions regarding performance are provided in the tables below.

Assessment Area	<b>Lending Test</b>	<b>Investment Test</b>	Service Test
Toledo OH MSA	Consistent	Consistent	Consistent

For the lending test, SB&T received a "Low Satisfactory" rating in Ohio. Performance in the Toledo MSA limited-scope area was consistent with SB&T's performance for the state.

Lending levels were adequate for geographic distribution of loans and borrower distribution of loans in this area. SB&T is a leader in making community development loans in the Toledo MSA. However, gaps in lending were significant. SB&T's penetration rate in the Toledo MSA was 67.9%; however, 66.7% of low- and 63.3% of moderate-income tracts were not penetrated.

In addition to the 11 community development loans, SB&T made three community development investments and nine donations, resulting in the investment test being consistent with the performance of SB&T's overall state performance. SB&T provided a relatively high level of community development services in the Toledo MSA, but the Toledo MSA overall service test is consistent with SB&T's overall service test rating because the percentage of low- and moderate-income tracts greatly exceeded the percentage of SB&T's branches in low- and moderate-income tracts. SB&T had no branches in low- or moderate-income tracts, yet 34.2% of the census tracts in the assessment area are low- or moderate-income.

The Toledo MSA has 13 low-income census tracts (16.2%). In the low-income census tracts, 47.1% of the housing units are rental and 21.2% are vacant. There are 30 moderate-income census tracts (18.2%) in the Toledo MSA, of which 43.3% of the housing units are rentals and 14.8% are vacant. The percentage of households below the poverty level in the Toledo MSA (16.3%) is higher than the state (13.7%) and the percentage of families below the poverty level in the Toledo MSA (12.0%) is higher than the state (10.3%). The unemployment rate in the Toledo MSA is 11.4%, which is higher than the state unemployment rate of 8.6% and can limit opportunities to originate residential mortgage loans.

The performance in the Toledo MSA limited-scope assessment area did not change the overall state rating.

### STATE OF INDIANA

CRA RATING FOR Indiana: "Satisfactory"
The Lending Test is rated: "Low Satisfactory"
The Investment Test is rated: "Low Satisfactory"
The Service Test is rated: "Low Satisfactory"

The major factors supporting this rating include:

- An adequate responsiveness to the credit needs of the community;
- An adequate geographic distribution of loans throughout the assessment area;
- A good distribution among borrowers of different income levels and a good distribution to businesses of different revenue sizes;
- A poor level of lending activity
- Makes few, if any, community development loans;
- An adequate level of qualified community development investments and grants;
- Retail delivery systems that are not reasonably accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- An adequate level of community development services.

#### SCOPE OF EXAMINATION

A full-scope review was conducted for the Fort Wayne MSA, which represents SB&T's entire banking operations in Indiana. Thus, the results in the Fort Wayne MSA will be used in determining the CRA rating for the state. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the institution section of this report.

#### **METROPOLITAN AREAS**

(Full-scope review)

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FORT WAYNE, INDIANA MSA #23060

The Fort Wayne MSA consists of Allen, Wells, and Whitley Counties. SB&T's assessment area includes the entirety of Allen County. DeKalb County, which is a non-metropolitan county contiguous to the Fort Wayne MSA, is also included in the assessment area. These counties are located in the northeastern portion of Indiana. SB&T has one branch office located in the city of Fort Wayne and no branch offices located in DeKalb County. The assessment area has 105 census tracts, of which 13 are low- (12.4%), 28 are moderate- (26.7%), 38 are middle- (36.2%), 25 are upper-income tracts (23.8%), and one income tract is unknown (1.0%). The unknown-income tract includes Indiana University–Purdue University Fort Wayne.

Allen County is located in northeastern Indiana with DeKalb County to the north, Paulding County in Ohio to the east, Adams and Wells Counties to the south, and Whitley and Huntington Counties to the west. Fort Wayne is the largest city and county seat. The county has a population of 355,329, according to the 2010 U.S. Census, and is a mixture of cropland, forest, and developed areas.

DeKalb County is located north of Allen County. Williams and Defiance counties in Ohio border DeKalb County to the east; DeKalb County is bordered by Steuben County to the north and Noble County to the west. Auburn is the largest city and county seat. As of the 2010 U.S. Census, the population was 42,223, and is a mixture of cropland, forest, and developed areas.

According to the June 30, 2017 FDIC Deposit Market Share Report, SB&T ranked 19<sup>th</sup> out of 26 institutions in the market with a deposit share of 0.44% in the assessment area. <sup>15</sup> As shown in the table below, the top four largest institutions were Wells Fargo Bank, JPMorgan Chase Bank, Lake City Bank and PNC Bank with 26.2%, 15.7%, 10.3% and 9.7% of the market share, respectively. Deposits in this assessment area accounted for 4.5% of SB&T's total deposits. This assessment area was second smallest in the percentage of deposits within SB&T's CRA footprint.

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<sup>15</sup> http://www2.fdic.gov/sod/sodMarketBank.asp

#	Financial Institution	Deposit Market Share
1	Wells Fargo Bank, National Association	26.24%
2	JPMorgan Chase Bank, National Association	15.67%
3	Lake City Bank	10.32%
4	PNC Bank, National Association	9.66%
5	IAB Financial Bank	8.02%
6	Old National Bank	6.70%
7	STAR Financial Bank	4.89%
8	1st Source Bank	4.03%
9	Fifth Third Bank	3.23%
10	The Garrett SB&T	2.57%

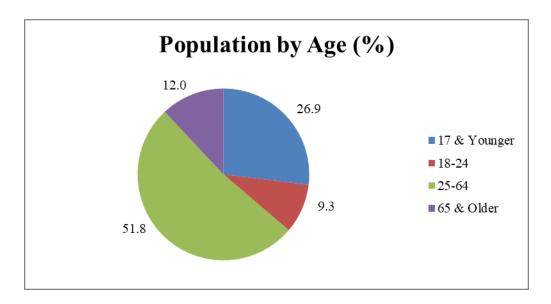
SB&T originated 111 HMDA loans (66 home purchase loans, 42 home refinance loans, and three home improvement loans) and 31 CRA loans (26 small business and five small farm), which represented 3.6% and 5.6% of the total loans originated during the evaluation period, respectively. This was the fourth-largest HMDA market and fourth-largest CRA market for loans originated during the evaluation period.

In 2016, SB&T ranked 43<sup>rd</sup> among 289 HMDA reporters in the assessment area. The top four HMDA lenders in the assessment area were Ruoff Mortgage Company, Wells Fargo Bank, Three Rivers FCU and Hallmark Home Mortgage LLC. SB&T is ranked 31<sup>st</sup> of 73 CRA reporters in the assessment area in 2016. The top four CRA lenders in the assessment area were Citibank, American Express FSB, Chase Bank and PNC Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

One community contact interview was conducted to provide additional information regarding the assessment area. The contact represented a non-profit, community-based organization focused on economic growth and prosperity by providing alternative financing options to new and existing small business owners. This contact stated that the Fort Wayne market is saturated with financial institutions and as a result, business owners benefit as the financial institutions compete to get the lending activity. The community contact further stated that the small, local institutions were more apt to work with their organization when alternative financing is needed for a small business. The contact also noted that the smaller, local financial institutions really take the time to get to know the client/business in order to provide the best fitting options.

#### **Population Characteristics**

According to the 2010 U.S. Census, the total population in the assessment area was 397,552. Approximately, 8.1% of the assessment area's population resides in low-income tracts and 23.8% resides in moderate-income tracts, while 38.4% reside in middle-income tracts, 29.5% in upper-income tracts, and 0.2% in the unknown-income tracts. As shown in the chart below, 73.1% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 61.1% of the population is between the ages of 18 and 64 and more likely to have credit needs.



As depicted in the following table, the population in the Fort Wayne MSA has increased, and the table below shows the population in the assessment area by county for 2010 and 2016, <sup>16</sup> with the percentage of the population increase or decrease.

County	2010 Population	2016 Population	Population Percent Change
Allen	355,329	370,404	4.2%
DeKalb	42,223	42,746	1.2%
Total	397,552	413,150	3.9%

The population both Allen and DeKalb counties increased, although the increase was more significant in Allen County.

#### **Income Characteristics**

According to data from the United States Department of Housing and Urban Development (HUD), the 2010 median family income levels for the assessment area was \$58,300. The Fort Wayne MSA estimated median family income levels decreased from 2015 to 2016, as detailed in the following table. <sup>17</sup>

Borrower Income Levels Fort Wayne, Indiana - MSA

HUD Est	tima te d Me dian		L	.ow	M	ode	ate	1	Viidd	ile	Ţ	Jppe	er
Fam	ily Income	0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2015	\$61,800	0	-	\$30,899	\$30,900	-	\$49,439	\$49,440	-	\$74,159	\$74,160	-	& above
2016	\$58,300	0	-	\$29,149	\$29,150	-	\$46,639	\$46,640	-	\$69,959	\$69,960	-	& above

<sup>16</sup> Population data is derived from the U.S. Census Data 2015 Statistical Abstract (enter state, county, town or zip code): <a href="https://factfinder.census.gov/faces/nav/jsf/pages/community\_facts.xhtml#">https://factfinder.census.gov/faces/nav/jsf/pages/community\_facts.xhtml#</a>

<sup>17</sup> http://www.huduser.org/portal/datasets/il/il13/index.html

The assessment area contains 151,737 households, of which 101,215 (66.7%) are designated as families. Low- and moderate-income families represent 18.9% and 18.8% of all families in this assessment area, respectively. Additionally, 8.8% of families live below the poverty level, compared to the state at 9.5%.

Based on data from the U.S. Census Bureau's Small Area Income and Poverty Estimates (SAIPE)<sup>18</sup>, household poverty rates for the counties in the assessment area are as follows:

County	2014 Poverty Rate	2015 Poverty Rate	Change
Allen County, IN	15.2%	14.6%	-3.9%
DeKalb County, IN	10.1%	10.5%	4.0%
INDIANA	15.2%	14.4%	-5.3%
United States	15.5%	14.7%	-5.2%

The poverty rate in DeKalb County is lower than the state and nation. The poverty rate in Allen County is higher than the state, but slightly lower than the nation. The areas with relatively high poverty rates may be an indication that individuals, especially those that are low- or moderate-income, may have difficulty in having sufficient financial resources to obtain loans.

### **Labor, Employment and Economic Characteristics**

The following table identifies the primary employment sectors by number of employees and major employers in this assessment area, according to the Stats America Agency: <sup>19</sup>

County	Primary Employment Sectors	Major Employers			
		Parview Health Systems; Lutheran Health Network; General			
Allen	Health Care, Social Assistance; Manufacturing; Finance &	Motors; Fort Wayne Community Schools; City of Fort Wayne;			
Alleli	Insurance; Transportation & Warehousing	Lincoln Financial Group; BFGoodrich; Frontier Communications;			
		Allen County Government; IPFW			
		Cooper-standard (Auburn); Walmart Distribution Ctr (Auburn);			
DeKalb	Manufacturing; Health Care, Social Assistance; Transportation	Therma-tru Corp (Butler); Steel Dynamics Flat Roll Div (Butler);			
Dekaib	& Wharehousing; Finance and Insurance	Carlex Glass Of Indiana Inc (Auburn); Iron Dynamics (Butler); De			
		Kalb Hospital Home Care (Auburn); Walmart Supercenter (Auburn)			
		Tower Automotive (Auburn); Csx Transportation (Garrett)			

The following table illustrates the average annual unemployment rates for 2015 and 2016 for the Fort Wayne MSA, the state and nation.

19 Stats America County Profiles:

http://www.statsamerica.org

<sup>18</sup> U.S. Department of Commerce: <a href="https://www.census.gov/programs-surveys/saipe.html">https://www.census.gov/programs-surveys/saipe.html</a>

# Unemployment Rates State Bank: Fort Wayne, IN - MSA

Area	Years - A	Annualized
Alta	2015	2016
Allen Co.	4.4	3.8
*DeKalb Co.	3.9	3.5
Fort Wayne, IN MSA	4.3	3.7
Indiana	4.6	4
National	4.8	4.5

Not Seasonally Adjusted, Data Extracted on October 26, 2017

Unemployment rates in both counties have declined from 2015 to 2016. However, the unemployment rate in Allen County is higher than the Fort Wayne MSA. The unemployment rates for both Allen and DeKalb Counties are lower than the state and nation. The higher percentage of unemployment rates in Allen County may indicate that individuals, especially those that are low- or moderate-income, may have difficulty in having sufficient financial resources to obtain loans.

#### **Housing Characteristics**

Based on the 2010 U.S. Census, there are 151,737 housing units and 101,215 families in this assessment area. From an income perspective, 7.9% of housing units, 33.8% of owner-occupied units, and 7.1% of families are located in low-income tracts and 26.1% of housing units, 46.3% of owner-occupied units, and 21.5% of families are located in moderate-income tracts. Over half of the housing units in the low- and moderate-income census tracts are either rental or vacant (66.2% and 53.6%, respectfully). The higher number of rental and vacant units compared to the number of families in these tracts suggests there is a limited opportunity for mortgage credit in low- and moderate-income geographies.

The median age of housing stock was 42 years, according to the 2010 U.S. Census, with 24.3% of housing built prior to 1950. Within the assessment area, the median age of housing stock was 61 years in low-income tracts and 47 in moderate-income tracts. Older homes are typically more likely to require repairs and rehabilitation; therefore, this assessment areas aging housing stock could represent opportunities for SB&T to provide home improvement and rehabilitation loans in low- or moderate-income areas.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$113,097 with an affordability ratio of 42.8%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Further, based on the 2016 median family income for the Fort Wayne MSA (\$58,300), approximately 46.1% of the homes valued up to \$106,851 in the assessment area would be considered affordable for low-income individuals and 76.3% of the homes valued up to \$170,962 would be considered affordable for moderate-income individuals.

<sup>\*</sup>Non MSA County, but part of this AA for this exam only

These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed-rate, 30-year loan. The table below shows the median home values and associated appreciation over the prior year for the assessment area. This information obtained from Sperling's Best Places.<sup>20</sup>

County	Median Home Values	Appreciation (over prior year)
Allen	\$110,500	5.0%
DeKalb	\$111,800	3.1%

According to the 2010 U.S. Census, the median gross rent in the assessment area was \$626, with 7.0% of the rental units having rents of less than \$350 a month. The majority of rents (36.1%) in this assessment area were \$500 to 699, while 16.7% of rents were \$350 to\$499 and 35.1% of rents were greater than \$700 per month. Approximately 25.5% of all housing units in the assessment area are rental units. Additionally, 38.9% of renters have rent costs greater than 30.0% of their income.

According to Realtytrac,<sup>21</sup> an online database that tracks and provides foreclosure statistics, Allen and DeKalb counties had foreclosure rates higher than the state and nation. DeKalb County's rate was roughly two times that of the state and more than two times the rate for the nation. The following table shows the foreclosure filings in the assessment area, state and nation.

Geography Name	Ratio of Properties Receiving Foreclosure Filings in October 2017
Allen	1:1,164
DeKalb	1:721
Indiana	1:1,439
<b>United States</b>	1:1,903

The following table illustrates the demographics in the Fort Wayne MSA.

<sup>20</sup> Sperling's Best Places, www.bestplaces.net

<sup>21</sup> www.realtytrac.net

# **Combined Demographics Report**

Assessment Area(s): Fort Wayne, IN MSA 2016

Income Categories	Tract Distribut	ion		Families ract Inco	-	Families < P Level as % Families by	6 of	Families Family Inc	
	#	%		#	%	#	%	#	%
Low-income	13	12.4		7,141	7.1	2,499	35	19,098	18.9
Moderate-income	28	26.7		21,707	21.4	3,335	15.4	19,002	18.8
Middle-income	38	36.2		40,312	39.8	2,396	5.9	22,879	22.6
Upper-income	25	23.8		32,055	31.7	722	2.3	40,236	39.8
Unknown-income	1	1		0	0	0	0	0	0
Total Assessment Area	105	100.0	1	01,215	100.0	8,952	8.8	101,215	100.0
	Housing				Hous	ing Types by T	Tract	•	
	Units by	C	) wner-	Occupie	d	Rental		Vacant	
	Tract		#	%	%	#	%	#	%
Low-income	15,659		5,298	4.9	33.8	6,678	42.6	3,683	23.5
Moderate-income	45,540	2	21,023	19.3	46.2	18,527	40.7	5,990	13.2
Middle-income	64,806	4	46,158	42.5	71.2	13,192	20.4	5,456	8.4
Upper-income	42,944		36,187	33.3	84.3	4,599	10.7	2,158	5
Unknown-income	75		0	0	0	75	100	0	0
Total Assessment Area	169,024	10	8,666	100.0	64.3	43,071	25.5	17,287	10.2
	Total Busines	sses by			Busines	sses by Tract &	& Reven	ue Size	
	Tract			ss Than \$1 Millio		O ver \$1 Million		Revenue l Reporte	
	#	%		#	%	#	%	#	%
Low-income	1,448	9.1		1,175	8.4	266	15.2	7	4.7
Moderate-income	3,437	21.7		2,928	21	473	27	36	24.2
Middle-income	5,943	37.5		5,218	37.4	675	38.5	50	33.6
Upper-income	4,991	31.5		4,603	33	332	18.9	56	37.6
Unknown-income	47	0.3		40	0.3	7	0.4	0	0
Total Assessment Area	15,866	100.0		13,964	100.0	1,753	100.0	149	100.0
	Percentage of	Total B	usine	sses:	88.0		11.0		.9
	Total Farm	s by			Farm	s by Tract & 1	Revenue	Size	
	Tract			ss Than \$1 Millio		O ver \$1 Million		Revenue l Reporte	
	#	%		#	%	#	%	#	%
Low-income	1	0.2		1	0.2	0	0	0	0
Moderate-income	18	3.4		18	3.5	0	0	0	0
Middle-income	304	58		301	57.8	3	100	0	0
Upper-income	201	38.4		201	38.6	0	0	0	0
Unknown-income	0	0		0	0	0	0	0	0
Total Assessment Area	524	100.0		521	100.0	3	100.0	0	.0
	Percentage of	Total F	arms:		99.4		.6		.0

2016 FFIEC Census Data and 2016 D&B Information

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FORT WAYNE IN MSA #23060

#### **Lending Test**

Lending performance in the Fort Wayne MSA is rated "Low Satisfactory." SB&T demonstrated an adequate responsiveness to the credit needs of the community. However, SB&T provides few, if any, community development loans. There were no qualifying community development loans made in this assessment area for this review period. SB&T had an adequate geographic distribution of loans, but significant gaps in lending in low- and moderate-income tracts were identified. However, having only one branch located in an upper-income tract in the assessment area, which is some distance from the majority of low- and moderate-income tracts in the area, could contribute to these noted gaps. SB&T has a good distribution among borrowers of different incomes. SB&T exhibits an adequate record of serving the credit needs of low-income individuals, and businesses with gross annual revenues of \$1 million or less. SB&T made use of flexible lending programs, which augmented performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending based on overall volume, followed by refinance. There was not enough home improvement, multi-family, small business or small farm loans to conduct a meaningful analysis. Further, geographic and borrower distribution received equal weighting based on the level of low- and moderate-income tracts (39.1%) and the percentage of low-and moderate-income families (37.7%) in the assessment area.

SB&T's lending performance was compared to 2016 aggregate performance of all lenders required to report HMDA and CRA data within the respective assessment areas. Details of SB&T's residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix D.

#### **Lending Activity**

Lending activity reflects a poor responsiveness to the credit needs within the assessment area. SB&T originated 111 HMDA loans (66 home purchase, 42 refinance, and three home improvement) and 31 CRA loans (26 small business and five small farm). This represents 3.92% of SB&T's total lending, which is less than the percentage of total deposits at 4.5% in this area. Further, significant lending gaps were identified. The penetration rate, overall, was 51.4%, with only 7.7% of low- and 21.4% of moderate-income tract penetrated.

#### Geographic Distribution of Lending

SB&T's overall distribution of lending among geographies is adequate. Home purchase and refinance loans is considered adequate. Significant levels of lending gaps were identified, especially in low- and moderate-income tracts as shown in the following table.

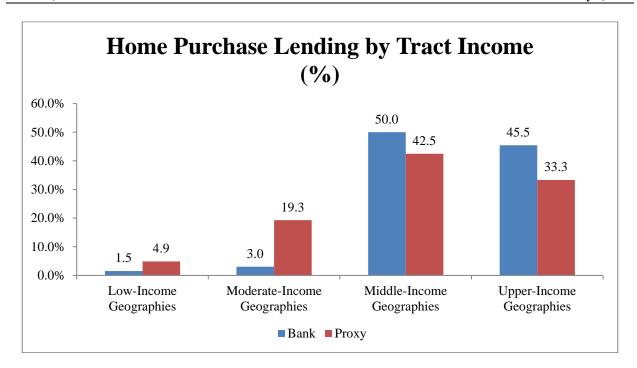
Tract Income	Number of Tracts	Tracts with No Loans	Penetration
Levels			
Low	13	12	7.7%
Moderate	28	22	78.6%
Middle	38	12	31.6%
Upper	25	4	16%
Unknown	1	1	0.0%
Total	105	51	51.4%

SB&T made loans in one out of 13 low-income census tracts (7.7%), six of the 28 moderate-income census tracts (21.4%), 26 of the 38 middle-income census tracts (68.4%), and in 21 of the 25 upper-income census tracts (84.0%). Overall, SB&T made loans in 54 of 105 census tracts (51.4%) in the assessment area, which is considered adequate.

Based on 2010 U.S. Census data, there are 13 low- and 28 moderate-income tracts in this assessment area, with 7.1% of families residing here and 21.5% of the families residing in moderate-income tracts. Families living below poverty comprise 27.9% of low- and 37.3% of moderate-income tracts. Further, 9.3% of all housing units are in low-income tracts and 26.9% are in moderate-income tracts. Of these units, 33.8% in low- and 46.2% in moderate-income tracts are owner-occupied, which was lower than the overall owner-occupancy rate for the assessment area (64.3%). In addition, 66.2% are rental and vacant in low- and 53.8% are rental or vacant in moderate-income tracts. The low percentage of families residing in low- and moderate-income tracts and a lower percentage of owner-occupied housing and higher percentage of rental and vacant units could limit lending opportunities for residential mortgage loans.

#### Home Purchase Lending

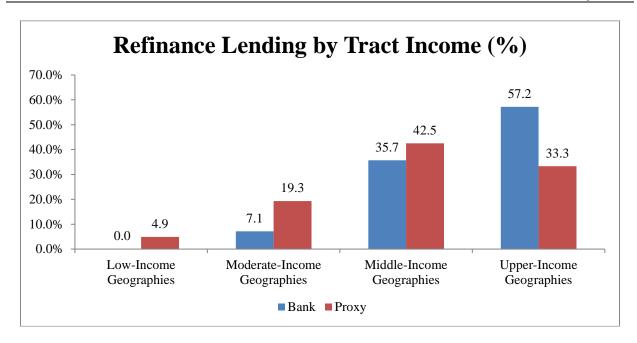
SB&T's home purchase lending was well below the percentage of owner-occupied units (proxy) in low- and significantly below in moderate-income tracts. The geographic distribution of home purchase loans is considered adequate.



SB&T originated one (1.5%) home purchase loan in low-income tracts and two (3.0%) in moderate-income tracts. Although proxy outperformed SB&T in low-income tracts, SB&T outperformed the aggregate and is considered excellent in comparison with the aggregate. SB&T's home purchase lending in moderate-income tracts was significantly below proxy and aggregate. The lack of owner-occupied units in low- and moderate-income tracts and low percentage of families could impact home purchase lending in low-income tracts. The geographic distribution for home purchase loans is considered adequate.

#### Refinance Lending

SB&T's refinance lending was significantly below the percentage of owner-occupied units (proxy) in low- and well below in moderate-income tracts. The geographic distribution of home purchase loans is considered adequate.



SB&T originated no refinance loans in low-income tracts and five in moderate-income tracts. Refinance lending in low- and moderate-income tracts was also significantly below aggregate in low-income tracts, but was adequate in moderate income tracts. The lack of owner-occupied units in low- and moderate-income tracts and low percentage of families could impact refinance lending in low-income tracts. The geographic distribution for refinance loans is considered poor.

#### Borrower Distribution of Lending

Overall, the distribution of loans is good based on borrower income. Borrower distribution is excellent for home purchase and good for refinance lending.

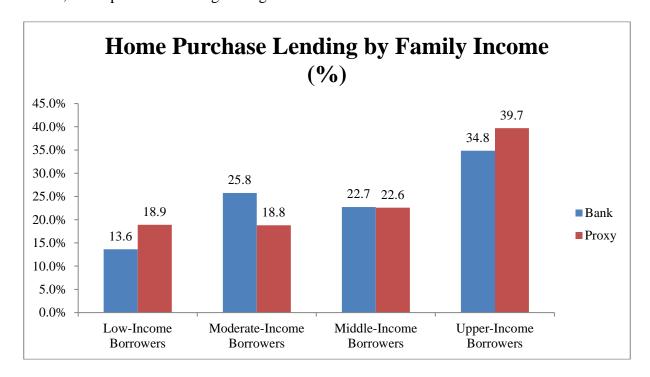
As mentioned previously, based on the 2016 median family income for the MSA, approximately 46.1% of the homes valued up to \$106,851 in the assessment area would be considered affordable for low-income individuals and 76.3% of the homes valued up to \$170,962 would be considered affordable for moderate-income individuals. Rental and vacant units make up 34.7% of the housing units in the assessment area. Low- and moderate-income families make up 37.7% of the families living in assessment area with 11.1% of families below the poverty level. These factors can limit opportunities to originate residential mortgage loans.

#### Home Purchase Lending

SB&T's performance was compared to the income levels of families in the assessment area (proxy) that are HMDA reporters. As shown in the following chart, SB&T's home purchase lending was below proxy for low-income borrowers but above proxy for moderate-income borrowers. SB&T's lending was also above proxy to middle-income borrowers, but was slightly below to upper-income borrowers.

While SB&T originated nine (13.6%) home purchase loans to low-income borrowers compared to the percentage (18.9%) of low-income families in the assessment area, which was considered an adequate performance, SB&T's performance was excellent when compared with the aggregate. SB&T originated 17 (25.8%) home purchase loans to moderate-income borrowers compared to the percentage (18.8%) of moderate-income families in the assessment area, which was considered an excellent performance. SB&T home purchase lending to moderate-income borrowers when compared to aggregate was also excellent. Further, with the median housing value of \$113,098, the affordability of housing for low-income families is limited, based on an affordability ratio of 42.8%. Based on this affordability ratio, only 46.1% of housing would be available to low-income borrowers up to a value of \$106,851, which is less than the median housing value. Additionally, 8.5% of the assessment area's labor force is unemployed; having high unemployment means fewer will qualify for a loan.



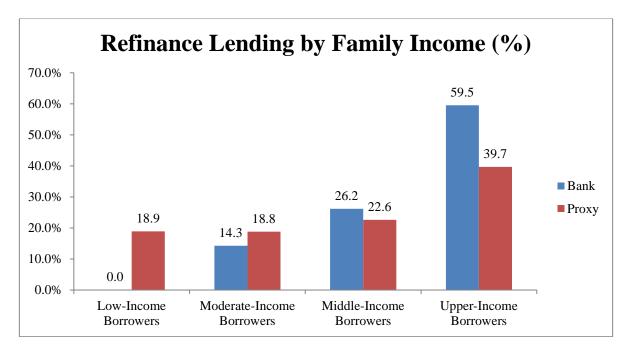


#### Refinance Lending

As shown in the chart below, SB&T's refinance lending was significantly below proxy for low-income borrowers. SB&T's refinance lending was slightly below proxy for moderate-income borrowers, but was above proxy for middle- and upper-income borrowers.

SB&T's lending to low-income borrowers, when compared with aggregate was still poor. SB&T's lending to moderate-income borrowers was excellent when compared with the aggregate. Based on the assessment area's affordability ratio (42.8%), only 46.1% of housing would be available to low-income borrowers up to a value of \$106,851, which is less than the median housing value of \$113,097.

Overall, refinance lending among borrowers of different incomes is good.



### Community Development Loans

SB&T did not originate any community development loans in this assessment area. SB&T is ranked 19<sup>th</sup> out of 26 financial institutions with 0.44% of the deposit market share. As noted by the community contact, SB&T faces significant competition in the Fort Wayne MSA, especially from large regional banks; therefore, making community development loans may be difficult. However, SB&T's performance is very poor.

#### Flexible Lending Programs

In addition to traditional bank products, SB&T originates loans through flexible lending programs such as: the Small Business Administration (SBA) (loans to small businesses which are more complex to originate); USDA Rural Housing loans, Federal Housing Administration (FHA) and Veterans Administration (VA) loans; Welcome Home Grants (a program that provides grant money (\$5,000 per household) to low- or moderate-income applicants to use for down payment and closing cost assistance). In addition SB&T offers Home Possible Advantage, a conventional program requiring 3% down payment for qualified borrowers. In addition, SB&T developed an internal product, Community Home Loan, which is a special financing opportunity with no PMI if the borrower meets certain criteria, such as evidencing participation in a home ownership counseling program and the borrower(s) must contribute \$500.00 of their own funds in the transaction. These types of programs allow financial institutions to address credit needs of low- and moderate-income borrowers in a safe and sound manner and have augmented SB&T's performance within its assessment area

#### **Investment Test**

SB&T made one investment totaling \$259,542 and contributed three donations totaling \$7,300. The investment was for affordable housing and was from a prior period. The donations of \$7,300 were smaller-dollar supporting community services including providing emotional, behavioral, and mental health services for children, young adults, and low- and moderate-income families. Community development investments and donations for this assessment area represented 9.2% of the total dollar volume of community development and donations originated by SB&T, which is above the percentage of total deposits of 4.5% for this assessment area. Overall, SB&T exhibits an adequate level of qualified community development investments and donations.

#### **Service Test**

#### Retail Services

The distribution of branches is very poor in the Fort Wayne MSA and is not reasonably accessible. SB&T does not have any branches in low-income tracts. There are 13 low-income census tracts and the percentage of families in these tracts is 18.9%. SB&T does not have any branches in moderate-income tracts. There are 28 moderate-income census tracts and the percentage of families in these tracts is 18.8%. SB&T was able to penetrate only 7.7% of low-and 21.4% of moderate-income tracts. Since there were no branches in low- or moderate-income geographies, the percentage of branches in low- and moderate-income geographies did not exceed the percentage of families residing in those geographies. SB&T did not open or close any branches in this assessment area during the evaluation period.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or families and are consistent with the services and hours discussed in the institutional assessment.

SB&T has one banking center in an upper-income tract in the assessment area. The proximity to low- and moderate-income tracts from this banking center may contribute to SB&Ts gaps in penetrating low- and moderate-income geographies. The banking center in this assessment area represent 5.3% of all SB&T's banking centers overall. SB&T has one full-service ATM in an upper-income census tract in the assessment area.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the percentage of tracts and the percentage of families living in those tracts.

Tract Income Category	Percentage of Banking Centers	Percentage of ATMs	Percentage of Tracts*	Percentage of Families in Tracts
Low	0.0%	0.0%	12.4%	7.1%
Moderate	0.0%	0.0%	26.7%	21.4%
Middle	0.0%	0.0%	36.2%	39.8%
Upper	100.0%	100.0%	23.8%	31.7%

<sup>\*</sup>The percentage of tracts includes the two unknown tracts. For analysis of lending data, unknown tracts were removed.

The branch/ATM distribution reflects a very poor dispersion within this assessment area.

#### Community Development Services

SB&T provided an adequate level of community development services in this assessment area. Thirteen members of the board, management, and staff provided community development services including serving on the board committees of three different organizations. These 13 employees provided 10 different services to these three organizations over the review period. The services made included participation in economic development efforts, providing financial services to low- and moderate income individuals, and serving on a the board of a non-profit affordable housing entity.

# APPENDIX A SCOPE OF EXAMINATION TABLE

TIME PERIOD REVIEWED	January 1, 2015 through	gh December 31, 2016	
FINANCIAL INSTITUTION  The State Bank and Trust Co.			PRODUCTS REVIEWED  HMDA Reportable CRA Reportable
Defiance, Ohio			CKA Reportable
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED -
None	None		None

ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED
INDIANA  • Fort Wayne MSA 23060	Full-scope review	None
OHIO – full-scope reviews  Columbus MSA 18140 Non-metropolitan Ohio Ohio – limited scope review Lima MSA 30620 Toledo MSA 45780	Full-scope reviews  Limited-scope reviews	None

# APPENDIX B

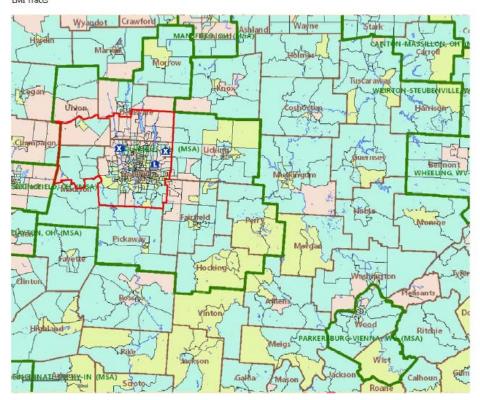
# SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS

Institution Rating	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Institution	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State MSA Ratings				
State of Indiana	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Ohio	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

#### **APPENDIX C**

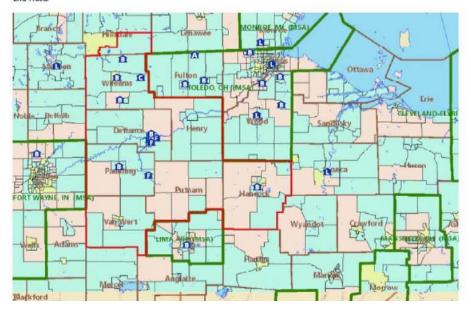
#### ASSESSMENT AREA MAPS

# Assessment Area: 2016 Columbus OH, MSA



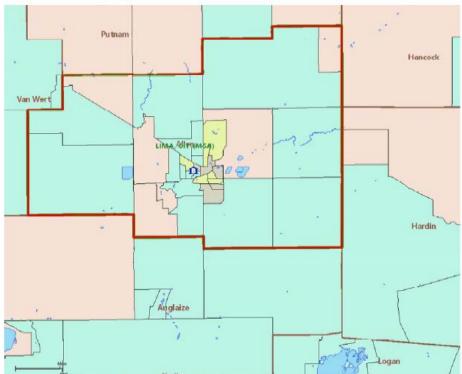


# Assessment Area: 2016 Non MSA OH LMI Tracts





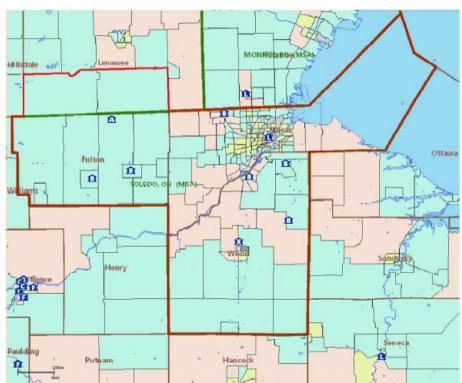
# Assessment Area: 2016 Lima, OH MSA LMI Tracts





#### Assessment Area: Toledo, OH MSA

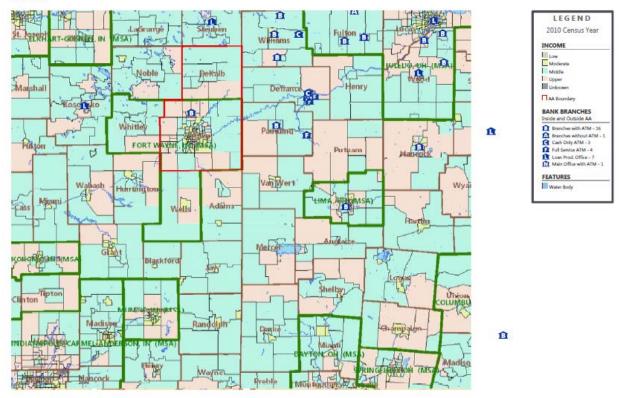
LMI Tracts





### Assessment Area: 2016 Fort Wayne, IN MSA

LMI Tracts



# APPENDIX D

# LENDING TABLES

# **COLUMBUS MSA**

#### **HMDA Loan Distribution Table**

Exam: State Bank, Defiance 2018

Assessment Area/Group: Columbus MSA 2015 and 2016

				HM	TDA .			
		By Trac					ver Income	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	39	3.3%	5,092	2.0%	Purchase 72	6.1%	6,842	2.7%
Moderate	102	8.6%	13,172	5.3%	247	20.9%	32,811	13.2%
Low/Moderate Total	141		18,264	7.3%	319	27.0%	39,653	15.2%
Middle  Middle	364	11.9% 30.8%	54,765	22.0%	256	21.6%	42,831	17.2%
			ŕ				, ,	
Upper	678	57.3%	176,219	70.7%	603	51.0%	165,004	66.2%
Unknown	0	0.0%	0	0.0%	5	0.4%	1,760	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,183	100.0%	249,248	100.0%	1,183	100.0%	249,248	100.0%
Low	5	1.2%	1,113	Ref ii 1.2%	nance 5	1.2%	438	0.5%
Moderate	14	3.4%	1,632	1.7%	49	11.8%		7.1%
Low/Moderate Total	19	4.6%	2,745	2.9%	49 54		6,818	7.1%
						12.9%	7,256	
Middle	76	18.2%	12,244	12.8%	66	15.8%	10,797	11.3%
Upper	322	77.2%	80,554	84.3%	292	70.0%	76,326	79.9%
Unknown	0	0.0%	0	0.0%	5	1.2%	1,164	1.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	417	100.0%	95,543	100.0%	417	100.0%	95,543	100.0%
_		1	l _		provement	1	1 -	1
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	9.1%	192	10.3%	1	9.1%	109	5.8%
Low/Moderate Total	1	9.1%	192	10.3%	1	9.1%	109	5.8%
Middle	3	27.3%	333	17.8%	3	27.3%	418	22.3%
Upper	7	63.6%	1,348	72.0%	7	63.6%	1,346	71.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	1,873	100.0%	11	100.0%	1,873	100.0%
		1	•	i	Family	· •	I	1
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	1,000	57.8%	0	0.0%	0	0.0%
Low/Moderate Total	1	50.0%	1,000	57.8%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	50.0%	730	42.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	1,730	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	1,730	100.0%	2	100.0%	1,730	100.0%
		1	· 1		Totals		· 1	1
Low	44	2.7%	6,205	1.8%	77	4.8%	7,280	2.1%
Moderate	118	7.3%	15,996	4.6%	297	18.4%	39,738	11.4%
Low/Moderate Total	162	10.0%	22,201	6.4%	374	23.2%	47,018	13.5%
Middle	443	27.5%	67,342	19.3%	325	20.1%	54,046	15.5%
Upper	1,008	62.5%	258,851	74.3%	902	55.9%	242,676	69.7%
Unknown	0	0.0%	0	0.0%	12	0.7%	4,654	1.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,613	100.0%	348,394	100.0%	1,613	100.0%	348,394	100.0%

<sup>\*</sup>Information based on 2010 ACS data

#### **CRA Loan Distribution Table**

Exam: State Bank, Defiance 2018

Assessment Area/Group: Columbus MSA 2015 and 2016

		SMALL E	USINESS			SMALL	FARM		SMALL BU	JS. SECURI	ED BY REAL ES	TATE
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
						By Tract	Income					
Low	2	3.0%	1,700	10.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	7	10.6%	1,337	7.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	9	13.6%	3,037	18.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	20	30.3%	4,321	25.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	37	56.1%	9,553	56.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	66	100.0%	16,911	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
				•		By Rev	enue					•
Total \$1 Million or Less	34	51.5%	6,544	38.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	32	48.5%	10,367	61.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	66	100.0%	16,911	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
						By Loa	n Size					
\$100,000 or less	27	40.9%	2,182	12.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	17	25.8%	2,780	16.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	22	33.3%	11,949	70.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	66	100.0%	16,911	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
					By Loan	Size and Rever	nue \$1 Million or	Less				
\$100,000 or less	16	47.1%	1,276	19.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	12	35.3%	2,004	30.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	17.6%	3,264	49.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	34	100.0%	6,544	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

<sup>\*</sup>Information based on 2010 ACS data

Selected Year: 2016

# **Peer Group HMDA Loan Distribution Table**

Exam ID: State Bank, Defiance 2018

Columbus, OH MSA 2016

				HM	MDA			
		By Tra	act Income			By Borro	wer Income	
	#	%	\$(000s)	%	#	%	\$(000s)	%
_		1			Purchase	1 1		1
Low	1,248	4.07%	150,477	2.5%	2,020	6.59%	193,193	3.2%
Moderate	4,473	14.59%	530,414	8.8%	5,550	18.1%	721,830	11.97%
Low/Moderate Total	5,721	18.66%	680,891	11.29%	7,570	24.69%	915,023	15.18%
Middle	9,500	30.98%	1,465,231	24.3%	5,602	18.27%	950,755	15.77%
Upper	15,445	50.37%	3,883,259	64.41%	12,132	39.56%	3,256,887	54.02%
Unknown	0	0.0%	0	0.0%	5,362	17.49%	906,716	15.04%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30,666	100.0%	6,029,381	100.0%	30,666	100.0%	6,029,381	100.0%
			i e		nance			
Low	561	2.73%	56,821	1.42%	813	3.95%	78,093	1.95%
Moderate	2,133	10.36%	222,678	5.55%	2,163	10.51%	239,782	5.98%
Low/Moderate Total	2,694	13.09%	279,499	6.96%	2,976	14.46%	317,875	7.92%
Middle	5,552	26.97%	807,601	20.12%	3,386	16.45%	495,820	12.36%
Upper	12,337	59.94%	2,925,940	72.91%	10,343	50.25%	2,514,521	62.66%
Unknown	0	0.0%	0	0.0%	3,878	18.84%	684,824	17.06%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20,583	100.0%	4,013,040	100.0%	20,583	100.0%	4,013,040	100.0%
				Home Im	provement			
Low	98	4.89%	7,056	2.67%	109	5.44%	6,397	2.42%
Moderate	229	11.43%	14,867	5.63%	263	13.12%	16,428	6.23%
Low/Moderate Total	327	16.32%	21,923	8.31%	372	18.56%	22,825	8.65%
Middle	525	26.2%	51,064	19.35%	399	19.91%	37,859	14.35%
Upper	1,152	57.49%	190,912	72.34%	1,128	56.29%	184,874	70.05%
Unknown	0	0.0%	0	0.0%	105	5.24%	18,341	6.95%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,004	100.0%	263,899	100.0%	2,004	100.0%	263,899	100.0%
		!	•	Multi	-Family		•	
Low	45	26.95%	113,772	11.59%	0	0.0%	0	0.0%
Moderate	40	23.95%	206,889	21.07%	0	0.0%	0	0.0%
Low/Moderate Total	85	50.9%	320,661	32.66%	0	0.0%	0	0.0%
Middle	46	27.54%	389,328	39.65%	0	0.0%	0	0.0%
Upper	35	20.96%	257,340	26.21%	0	0.0%	0	0.0%
Unknown	1	0.6%	14,506	1.48%	167	100.0%	981,835	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	167	100.0%	981,835	100.0%	167	100.0%	981,835	100.0%
10.00	107	100.070	701,022		A Totals	100.070	,01,022	100.070
Low	1,952	3.65%	328,126	2.91%	2,942	5.51%	277,683	2.46%
Moderate	6,875	12.87%	974,848	8.64%	7,976	14.93%	978,040	8.66%
Low/Moderate Total	8,827	16.52%	1,302,974	11.54%	10,918	20.44%	1,255,723	11.12%
Middle	15,623	29.25%	2,713,224	24.04%	9,387	17.57%	1,484,434	13.15%
Upper	28,969	54.23%	7,257,451	64.29%	23,603	44.18%	5,956,282	52.77%
Unknown	1	0.0%	14,506	0.13%	9,512	17.81%	2,591,716	22.96%
Tract Unknown	0	0.0%	14,506	0.13%	9,512	0.0%	2,591,716	0.0%
Tract Unknown Total	53,420	100.0%	11,288,155	100.0%	53,420	100.0%	11,288,155	100.0%
10141	33,420	100.0%	11,200,133	100.0%	33,420	100.0%	11,200,133	100.0%

#### Peer Group CRA Loan Distribution Table

Exam ID: State Bank, Defiance 2018

Selected Year: 2016

#### Columbus, OH MSA 2016

		SMALL	BUSINESS			SMAI	L FARM		SMALL I	BUS. SECU	RED BY REAL ES	TATE
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
		By Tra	ct Income			By Tra	act Income			By Tr	act Income	
Low	2,167	8.11%	137,383	10.43%	5	3.88%	99	1.89%	0	0.0%	0	0.0%
Moderate	5,840	21.86%	342,317	25.99%	4	3.1%	28	0.53%	0	0.0%	0	0.0%
Low/Moderate Income	8,007	29.97%	479,700	36.42%	9	6.98%	127	2.42%	0	0.0%	0	0.0%
Middle	6,130	22.94%	267,318	20.3%	47	36.43%	2,246	42.88%	0	0.0%	0	0.0%
Upper	12,364	46.27%	558,768	42.43%	73	56.59%	2,865	54.7%	0	0.0%	0	0.0%
Unknown	85	0.32%	8,480	0.64%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	134	0.5%	2,778	0.21%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26,720	100%	1,317,044	100%	129	100%	5,238	100%	0	0.0%	0	0.0%
		By I	Revenue			By I	Revenue			By	Revenue	
Total \$1 Million or Less	9,853	36.88%	320,420	24.33%	73	56.59%	3,644	69.57%	0	0.0%	0	0.0%
		By L	oan Size	•	-'	By L	oan Size			By I	Loan Size	•
\$100,000 or Less	24,129	90.3%	411,916	31.28%	118	91.47%	3,019	57.64%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1,295	4.85%	220,759	16.76%	9	6.98%	1,465	27.97%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1,296	4.85%	684,369	51.96%	2	1.55%	754	14.39%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26,720	100%	1,317,044	100%	129	100%	5,238	100%	0	0.0%	0	0.0%

# **NON-METROPOLITAN OHIO**

#### **HMDA Loan Distribution Table**

Exam: State Bank, Defiance 2018

Assessment Area/Group: Non MSA OH 2015 and 2016

				HM	/IDA			
	"	By Trac		0.4	,,,		ver Income	0.4
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	0	0.0%	0	0.0%	Purchase 45	6.7%	3,051	3.5%
Moderate	43	6.4%	3,958	4.6%	170	25.3%	14,616	16.8%
Low/Moderate Total	43	6.4%	3,958	4.6%	215	32.0%	17,667	20.4%
Middle	362	53.9%	40,030	46.1%	174	25.9%	19,097	22.0%
Upper	267	39.7%	42,795	49.3%	266	39.6%	47,953	55.3%
Unknown	0	0.0%	0	0.0%	17	2.5%	2,066	2.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	672	100.0%	86,783	100.0%	672	100.0%	86,783	100.0%
10111	0,2	100.070	00,700		nance	100.070	00,705	100.070
Low	0	0.0%	0	0.0%	13	5.3%	613	1.8%
Moderate	21	8.6%	2,066	6.0%	32	13.2%	2,332	6.8%
Low/Moderate Total	21	8.6%	2,066	6.0%	45	18.5%	2,945	8.6%
Middle	139	57.2%	16,774	49.0%	52	21.4%	5,407	15.8%
Upper	83	34.2%	15,392	45.0%	129	53.1%	22,103	64.6%
Unknown	0	0.0%	0	0.0%	17	7.0%	3,777	11.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	243	100.0%	34,232	100.0%	243	100.0%	34,232	100.0%
				Home Im	provement			
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	3	21.4%	169	14.3%
Low/Moderate Total	0	0.0%	0	0.0%	3	21.4%	169	14.3%
Middle	7	50.0%	546	46.2%	5	35.7%	535	45.3%
Upper	7	50.0%	635	53.8%	4	28.6%	383	32.4%
Unknown	0	0.0%	0	0.0%	2	14.3%	94	8.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	1,181	100.0%	14	100.0%	1,181	100.0%
		1	1	1	Family		1	
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
T		0.00/	1 0		A Totals	L 6 200	2.664	2.00/
Low	0	0.0%	0	0.0%	58	6.2%	3,664	3.0%
Moderate Low/Moderate Total	64	6.9%	6,024	4.9%	205	22.1%	17,117	14.0%
Low/Moderate Total		6.9%	6,024		263	28.3%	20,781	17.0%
Middle	508	54.7%	57,350	46.9%	231 399	24.9%	25,039	20.5%
Upper	357	38.4%	58,822	48.1%		42.9%	70,439	57.6%
Unknown	0	0.0%	0	0.0%	36	3.9%	5,937	4.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	929	100.0%	122,196	100.0%	929	100.0%	122,196	100.0%

<sup>\*</sup>Information based on 2010 ACS data

#### **CRA Loan Distribution Table**

Exam: State Bank, Defiance 2018

Assessment Area/Group: Non MSA OH 2015 and 2016

Income Categories	STATE	ED BY REAL EST	S. SECURE	SMALL BU		FARM	SMALL			USINESS	SMALL B		
Low   Down   D	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%	#	Income Categories
Moderate						Income							
Low/Moderate Total	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	Low
Middle	0.0%	0	0.0%	0	0.0%	0	0.0%	0	7.1%	2,259	8.0%	15	Moderate
Upper	0.0%	0	0.0%	0	0.0%	0	0.0%	0	7.1%	2,259	8.0%	15	Low/Moderate Total
Unknown         0         0.0%         388           Total SI Million or Less         96         51.3%         10,624         33.3%         95         94.1%         9.821         89.5%         7         100.0%         388           Over \$1 Million         91         48.7%         21,296         66.7%         6         5.9%         1,158         10.5%         0         0.0%         0         0.0%         0         0.0%         0         0.0% <td>27.3%</td> <td>106</td> <td>28.6%</td> <td>2</td> <td>69.3%</td> <td>7,612</td> <td>70.3%</td> <td>71</td> <td>54.8%</td> <td>17,490</td> <td>52.9%</td> <td>99</td> <td>Middle</td>	27.3%	106	28.6%	2	69.3%	7,612	70.3%	71	54.8%	17,490	52.9%	99	Middle
Tract Unknown         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         388           By Revenue           By Revenue           Total SI Million or Less         96         51.3%         10,624         33.3%         95         94.1%         9.821         89.5%         7         100.0%         388           Over \$1 Million         91         48.7%         21.296         66.7%         6         5.9%         1,158         10.5%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%         0         0.0%	72.7%	282	71.4%	5	30.7%	3,367	29.7%	30	38.1%	12,171	39.0%	73	Upper
Total 187 100.0% 31,920 100.0% 101 100.0% 10,979 100.0% 7 100.0% 388    Total St Million or Less   96   51.3% 10,624   33.3% 95   94.1% 9,821   89.5% 7 100.0% 388   Over \$1 Million   91   48.7%   21,296   66.7%   6   5.9% 1,158   10.5%   0   0.0%   0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	Unknown
Total \$1 Million or Less   96   51.3%   10.624   33.3%   95   94.1%   9.821   89.5%   7   100.0%   388	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	Tract Unknown
Total \$1 Million or Less   96   51.3%   10.624   33.3%   95   94.1%   9,821   89.5%   7   100.0%   388	100.0%	388	100.0%	7	100.0%	10,979	100.0%	101	100.0%	31,920	100.0%	187	Total
Over \$1 Million         91         48.7%         21,296         66.7%         6         5.9%         1,158         10.5%         0         0.0%         0           Not Known         0         0.0%         388         88           \$100,000 or less         \$102         \$4.5%         \$5,212         \$16.3%         66         65.5%         3,142         28.6%         7         \$100.0%         388           \$100,001 - \$250,000         \$51         27.3%         9,091         28.5%         25         24.8%         4,323         39.4%<						enue	By Rev						
Not Known         0         0.0%         388           \$100,000 or less         \$102         \$4.5%         \$5,212         \$16.3%         66         65.3%         \$3,142         \$28.6%         7         \$100.0%         388           \$100,001 - \$250,000         \$51         \$27.3%         \$9,091         \$28.5%         25         \$24.8%         \$4,323         \$39.4%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%         0         \$0.0%	100.0%	388	100.0%	7	89.5%	9,821	94.1%	95	33.3%	10,624	51.3%	96	Total \$1 Million or Less
Total 187 100.0% 31,920 100.0% 101 100.0% 10,979 100.0% 7 100.0% 388  \$100,000 or less 102 54.5% 5,212 16.3% 66 65.3% 3,142 28.6% 7 100.0% 388  \$100,001 - \$250,000 51 27.3% 9,091 28.5% 25 24.8% 4,323 39.4% 0 0.0% 0  \$250,001 - \$\$1 17,617 55.2% 10 9.9% 3,514 32.0% 0 0.0% 0  \$0 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0  \$0 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0  \$0 0 0.0% 101 100.0% 10,979 100.0% 7 100.0% 388  \$\$\$By Loan Six and Revenue \$1 Million or Less	0.0%	0	0.0%	0	10.5%	1,158	5.9%	6	66.7%	21,296	48.7%	91	Over \$1 Million
S100,000 or less   102   54.5%   5,212   16.3%   66   65.3%   3,142   28.6%   7   100.0%   388	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	Not Known
\$100,000 or less	100.0%	388	100.0%	7	100.0%	10,979	100.0%	101	100.0%	31,920	100.0%	187	Total
\$100,001 - \$250,000						n Size	By Loai						
\$250,001 - \$1 Million (Bus)-\$500k (Farm) 34 18.2% 17,617 55.2% 10 9.9% 3,514 32.0% 0 0.0% 0  Over \$1 Million (Bus)-\$500k (Farm) 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0  Total 187 100.0% 31,920 100.0% 101 100.0% 10,979 100.0% 7 100.0% 388  By Loan Siæ and Revenue \$1 Million or Less	100.0%	388	100.0%	7	28.6%	3,142	65.3%	66	16.3%	5,212	54.5%	102	\$100,000 or less
Over \$1 Million (Bus) \$500k (Farm)         0         0.0%         0         0         0.0% </td <td>0.0%</td> <td>0</td> <td>0.0%</td> <td>0</td> <td>39.4%</td> <td>4,323</td> <td>24.8%</td> <td>25</td> <td>28.5%</td> <td>9,091</td> <td>27.3%</td> <td>51</td> <td>\$100,001 - \$250,000</td>	0.0%	0	0.0%	0	39.4%	4,323	24.8%	25	28.5%	9,091	27.3%	51	\$100,001 - \$250,000
Total 187 100.0% 31,920 100.0% 101 100.0% 10,979 100.0% 7 100.0% 388  By Loan Siæ and Revenue \$1 Million or Less	0.0%	0	0.0%	0	32.0%	3,514	9.9%	10	55.2%	17,617	18.2%	34	\$250,001 - \$1 Million (Bus)-\$500k (Farm)
By Loan Size and Revenue \$1 Million or Less	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	Over \$1 Million (Bus)-\$500k (Farm)
	100.0%	388	100.0%	7	100.0%	10,979	100.0%	101	100.0%	31,920	100.0%	187	Total
\$100,000 or less					Less	ue \$1 Million or	Size and Reven	By Loan					
0.00,000 d. less	100.0%	388	100.0%	7	30.2%	2,963	67.4%	64	25.6%	2,723	67.7%	65	\$100,000 or less
\$100,001 - \$250,000	0.0%	0	0.0%	0	38.1%	3,744	23.2%	22	35.3%	3,746	22.9%	22	\$100,001 - \$250,000
\$250,001 - \$1 Million (Bus)-\$500k (Farm) 9 9.4% 4,155 39.1% 9 9.5% 3,114 31.7% 0 0.0% 0	0.0%	0	0.0%	0	31.7%	3,114	9.5%	9	39.1%	4,155	9.4%	9	\$250,001 - \$1 Million (Bus)-\$500k (Farm)
Over \$1 Million (Bus)-\$5500k (Farm) 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	Over \$1 Million (Bus)-\$500k (Farm)
Total 96 100.0% 10,624 100.0% 95 100.0% 9,821 100.0% 7 100.0% 388	100.0%	388	100.0%	7	100.0%	9,821	100.0%	95	100.0%	10,624	100.0%	96	Total

<sup>\*</sup>Information based on 2010 ACS data

Selected Year: 2016

# **Peer Group HMDA Loan Distribution Table**

Exam ID: State Bank, Defiance 2018

Non MSA OH 2016

				H	MDA			
		By Tra	act Income	_		By Borrov	wer Income	_
	#	%	\$(000s)	%	#	%	\$(000s)	%
		1			Purchase	1		1
Low	0	0.0%	0	0.0%	196	5.32%	13,305	2.98%
Moderate	292	7.92%	25,254	5.66%	873	23.69%	77,031	17.25%
Low/Moderate Total	292	7.92%	25,254	5.66%	1,069	29.01%	90,336	20.23%
Middle	1,962	53.24%	208,269	46.64%	812	22.04%	92,243	20.66%
Upper	1,425	38.67%	212,327	47.55%	1,143	31.02%	200,742	44.96%
Unknown	6	0.16%	681	0.15%	661	17.94%	63,210	14.16%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,685	100.0%	446,531	100.0%	3,685	100.0%	446,531	100.0%
				Refi	nance			
Low	0	0.0%	0	0.0%	138	5.92%	8,101	2.76%
Moderate	146	6.26%	12,221	4.16%	413	17.7%	34,497	11.74%
Low/Moderate Total	146	6.26%	12,221	4.16%	551	23.62%	42,598	14.49%
Middle	1,206	51.69%	134,255	45.67%	477	20.45%	47,737	16.24%
Upper	979	41.96%	147,125	50.05%	1,054	45.18%	170,079	57.86%
Unknown	2	0.09%	362	0.12%	251	10.76%	33,549	11.41%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,333	100.0%	293,963	100.0%	2,333	100.0%	293,963	100.0%
				Home In	provement			_
Low	0	0.0%	0	0.0%	26	6.9%	427	2.12%
Moderate	18	4.77%	606	3.0%	89	23.61%	3,065	15.19%
Low/Moderate Total	18	4.77%	606	3.0%	115	30.5%	3,492	17.31%
Middle	217	57.56%	10,708	53.08%	94	24.93%	4,295	21.29%
Upper	142	37.67%	8,859	43.92%	147	38.99%	11,595	57.48%
Unknown	0	0.0%	0	0.0%	21	5.57%	791	3.92%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	377	100.0%	20,173	100.0%	377	100.0%	20,173	100.0%
					-Family			
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	33.33%	15,783	51.11%	0	0.0%	0	0.0%
Low/Moderate Total	4	33.33%	15,783	51.11%	0	0.0%	0	0.0%
Middle	5	41.67%	1,941	6.29%	0	0.0%	0	0.0%
Upper	3	25.0%	13,158	42.61%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	12	100.0%	30,882	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	30,882	100.0%	12	100.0%	30,882	100.0%
	- 12	100.070	20,002		A Totals	100.070	50,002	100.070
Low	0	0.0%	0	0.0%	360	5.62%	21,833	2.76%
Moderate	460	7.18%	53,864	6.8%	1,375	21.46%	114,593	14.48%
Low/Moderate Total	460	7.18%	53,864	6.8%	1,735	27.08%	136,426	17.24%
Middle	3,390	52.91%	355,173	44.87%	1,383	21.59%	144,275	18.23%
Upper	2,549	39.78%	381,469	48.19%	2,344	36.58%	382,416	48.31%
Unknown	8	0.12%	1,043	0.13%	945	14.75%	128,432	16.23%
Tract Unknown	0	0.12%	0	0.0%	0	0.0%	0	0.0%
Total	6,407	100.0%	791,549	100.0%	6,407	100.0%	791,549	100.0%
10101	0,40/	100.070	171,347	100.070	0,407	100.070	171,347	100.070

#### Peer Group CRA Loan Distribution Table

Exam ID: State Bank, Defiance 2018

Selected Year: 2016

#### Non MSA OH 2016

		SMALL	BUSINESS			SMAI	LL FARM		SMALL	BUS. SECU	RED BY REAL ES	TATE
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
		By Tra	ct Income			By Tr	act Income			By Tr	act Income	
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	310	9.7%	26,144	13.0%	3	0.39%	22	0.03%	0	0.0%	0	0.0%
Low/Moderate Income	310	9.7%	26,144	13.0%	3	0.39%	22	0.03%	0	0.0%	0	0.0%
Middle	1,660	51.96%	95,886	47.67%	443	57.98%	36,887	53.91%	0	0.0%	0	0.0%
Upper	1,163	36.4%	77,583	38.57%	317	41.49%	31,446	45.96%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	62	1.94%	1,529	0.76%	1	0.13%	66	0.1%	0	0.0%	0	0.0%
Total	3, 195	100%	201,142	100%	764	100%	68,421	100%	0	0.0%	0	0.0%
		By I	tevenue			By I	Revenue			By	Revenue	
Total \$1 Million or Less	1,335	41.78%	66,737	33.18%	505	66.1%	56,463	82.52%	0	0.0%	0	0.0%
		By L	oan Size	-	•	By L	oan Size	•	•	By I	Loan Size	
\$100,000 or Less	2,781	87.04%	51,815	25.76%	547	71.6%	18,440	26.95%	0	0.0%	0	0.0%
\$100,001 - \$250,000	204	6.38%	35,497	17.65%	156	20.42%	27,280	39.87%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	210	6.57%	113,830	56.59%	61	7.98%	22,701	33.18%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3.195	100%	201.142	100%	764	100%	68.421	100%	0	0.0%	0	0.0%

#### **LIMA MSA**

# **HMDA Loan Distribution Table**

Exam: State Bank, Defiance 2018

Assessment Area/Group: Lima MSA 2015 and 2016

				HM	DA			
		By Trac	1			By Borrow		
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
		1		Home P		1 1	242	1
Low	1	1.8%	68	0.9%	4	7.3%	242	3.2%
Moderate	2	3.6%	104	1.4%	9	16.4%	914	12.2%
Low/Moderate Total	3	5.5%	172	2.3%	13	23.6%	1,156	15.4%
Middle	30	54.5%	3,890	51.9%	15	27.3%	1,826	24.4%
Upper	22	40.0%	3,428	45.8%	26	47.3%	4,408	58.9%
Unknown	0	0.0%	0	0.0%	1	1.8%	100	1.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	55	100.0%	7,490	100.0%	55	100.0%	7,490	100.0%
		1	ı	Refin		1 1		•
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	10.0%	88	5.5%	1	10.0%	88	5.5%
Low/Moderate Total	1	10.0%	88	5.5%	1	10.0%	88	5.5%
Middle	4	40.0%	644	40.1%	1	10.0%	44	2.7%
Upper	5	50.0%	872	54.4%	8	80.0%	1,472	91.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	1,604	100.0%	10	100.0%	1,604	100.0%
				Home Imp	provement			
Low	0	0.0%	0	0.0%	1	50.0%	75	36.4%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	50.0%	75	36.4%
Middle	2	100.0%	206	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	131	63.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	206	100.0%	2	100.0%	206	100.0%
				Multi-l	Family			•
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
				HMDA	Totals	!		
Low	1	1.5%	68	0.7%	5	7.5%	317	3.4%
Moderate	3	4.5%	192	2.1%	10	14.9%	1,002	10.8%
Low/Moderate Total	4	6.0%	260	2.8%	15	22.4%	1,319	14.2%
Middle	36	53.7%	4,740	51.0%	16	23.9%	1,870	20.1%
Upper	27	40.3%	4,300	46.2%	35	52.2%	6,011	64.6%
Unknown	0	0.0%	0	0.0%	1	1.5%	100	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	67	100.0%	9,300	100.0%	67	100.0%	9,300	100.0%

<sup>\*</sup>Information based on 2010 ACS data

#### **CRA Loan Distribution Table**

Exam: State Bank, Defiance 2018

Assessment Area/Group: Lima MSA 2015 and 2016

		SMALL E	USINESS			SMALL	FARM		SMALL BU	JS. SECURI	ED BY REAL ES	TATE
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
						By Tract						
Low	5	29.4%	1,766	49.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	17.6%	406	11.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	8	47.1%	2,172	60.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	4	23.5%	982	27.5%	1	100.0%	150	100.0%	0	0.0%	0	0.0%
Upper	5	29.4%	422	11.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	3,576	100.0%	1	100.0%	150	100.0%	0	0.0%	0	0.0%
			•		•	By Rev	enue		•		•	
Total \$1 Million or Less	9	52.9%	1,762	49.3%	1	100.0%	150	100.0%	0	0.0%	0	0.0%
Over \$1 Million	8	47.1%	1,814	50.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	3,576	100.0%	1	100.0%	150	100.0%	0	0.0%	0	0.0%
						By Loan	n Size					
\$100,000 or less	6	35.3%	453	12.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	8	47.1%	1,681	47.0%	1	100.0%	150	100.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	17.6%	1,442	40.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	3,576	100.0%	1	100.0%	150	100.0%	0	0.0%	0	0.0%
					By Loan	Size and Rever	ue \$1 Million or	Less				
\$100,000 or less	5	55.6%	372	21.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	33.3%	590	33.5%	1	100.0%	150	100.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	11.1%	800	45.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	1,762	100.0%	1	100.0%	150	100.0%	0	0.0%	0	0.0%

<sup>\*</sup>Information based on 2010 ACS data

Selected Year: 2016

# **Peer Group HMDA Loan Distribution Table**

Exam ID: State Bank, Defiance 2018

Lima, OH MSA 2016

				HM	MDA			
		By Tra	act Income		ĺ	By Borro	wer Income	
	#	%	\$(000s)	%	#	%	\$(000s)	%
					Purchase			
Low	31	2.17%	1,497	0.93%	112	7.84%	6,721	4.16%
Moderate	103	7.21%	6,405	3.96%	340	23.81%	30,371	18.78%
Low/Moderate Total	134	9.38%	7,902	4.89%	452	31.65%	37,092	22.94%
Middle	760	53.22%	78,221	48.38%	326	22.83%	37,786	23.37%
Upper	534	37.39%	75,573	46.74%	343	24.02%	58,179	35.98%
Unknown	0	0.0%	0	0.0%	307	21.5%	28,639	17.71%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,428	100.0%	161,696	100.0%	1,428	100.0%	161,696	100.0%
					nance			
Low	18	2.06%	840	0.81%	60	6.86%	3,590	3.47%
Moderate	54	6.17%	3,190	3.09%	135	15.43%	11,249	10.89%
Low/Moderate Total	72	8.23%	4,030	3.9%	195	22.29%	14,839	14.36%
Middle	464	53.03%	52,880	51.19%	204	23.31%	20,674	20.01%
Upper	339	38.74%	46,400	44.91%	286	32.69%	43,652	42.25%
Unknown	0	0.0%	0	0.0%	190	21.71%	24,145	23.37%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	875	100.0%	103,310	100.0%	875	100.0%	103,310	100.0%
				Home Im	provement			_
Low	2	1.67%	36	0.53%	17	14.17%	270	3.96%
Moderate	12	10.0%	281	4.12%	20	16.67%	702	10.29%
Low/Moderate Total	14	11.67%	317	4.65%	37	30.83%	972	14.25%
Middle	73	60.83%	3,557	52.14%	29	24.17%	1,424	20.87%
Upper	33	27.5%	2,948	43.21%	46	38.33%	4,204	61.62%
Unknown	0	0.0%	0	0.0%	8	6.67%	222	3.25%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	120	100.0%	6,822	100.0%	120	100.0%	6,822	100.0%
				Multi	-Family			•
Low	2	16.67%	2,648	37.62%	0	0.0%	0	0.0%
Moderate	3	25.0%	623	8.85%	0	0.0%	0	0.0%
Low/Moderate Total	5	41.67%	3,271	46.47%	0	0.0%	0	0.0%
Middle	5	41.67%	3,468	49.27%	0	0.0%	0	0.0%
Upper	2	16.67%	300	4.26%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	12	100.0%	7,039	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	7,039	100.0%	12	100.0%	7,039	100.0%
		,	·	HMD	A Totals		·	
Low	53	2.18%	5,021	1.8%	189	7.76%	10,581	3.79%
Moderate	172	7.06%	10,499	3.76%	495	20.33%	42,322	15.18%
Low/Moderate Total	225	9.24%	15,520	5.57%	684	28.09%	52,903	18.97%
Middle	1,302	53.47%	138,126	49.53%	559	22.96%	59,884	21.47%
Upper	908	37.29%	125,221	44.9%	675	27.72%	106,035	38.02%
Unknown	0	0.0%	0	0.0%	517	21.23%	60,045	21.53%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,435	100.0%	278,867	100.0%	2,435	100.0%	278,867	100.0%
20100	2,733	100.070	270,007	100.070	2,733	100.070	270,007	100.070

#### Peer Group CRA Loan Distribution Table

Exam ID: State Bank, Defiance 2018

Selected Year: 2016

#### Lima, OH MSA 2016

		SMALL BUSINESS SMALL FARM SMALL BUS, SECURED BY REAL										
	1	SMALL	BUSINESS		1	SMAI	LL FARM		SMALL I	BUS. SECU	RED BY REAL ES	TATE
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
		By Tra	ct Income			By Tr	act Income			By Tr	act Income	
Low	135	12.25%	13,813	19.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	89	8.08%	5,265	7.55%	1	0.81%	66	0.47%	0	0.0%	0	0.0%
Low/Moderate Income	224	20.33%	19,078	27.34%	1	0.81%	66	0.47%	0	0.0%	0	0.0%
Middle	536	48.64%	32,917	47.17%	104	83.87%	11,075	79.15%	0	0.0%	0	0.0%
Upper	325	29.49%	17,357	24.87%	19	15.32%	2,852	20.38%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	17	1.54%	425	0.61%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,102	100%	69,777	100%	124	100%	13,993	100%	0	0.0%	0	0.0%
		By F	Revenue			By I	Revenue			Ву	Revenue	
Total \$1 Million or Less	362	32.85%	16,573	23.75%	88	70.97%	10,255	73.29%	0	0.0%	0	0.0%
		By L	oan Size	-	•	By L	oan Size	•	-	By I	Loan Size	
\$100,000 or Less	959	87.02%	16,083	23.05%	81	65.32%	3,432	24.53%	0	0.0%	0	0.0%
\$100,001 - \$250,000	77	6.99%	14,278	20.46%	26	20.97%	4,128	29.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	66	5.99%	39,416	56.49%	17	13.71%	6,433	45.97%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,102	100%	69,777	100%	124	100%	13,993	100%	0	0.0%	0	0.0%

# **TOLEDO MSA**

#### **HMDA Loan Distribution Table**

Exam: State Bank, Defiance 2018

Assessment Area/Group: Toledo MSA 2015 and 2016

				HN	1DA			
		By Trac					wer Income	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	1	0.4%	28	0.1%	Purchase 16	6.9%	1,206	3.3%
Moderate	8	3.4%	576	1.6%	43	18.5%	4,185	11.5%
Low/Moderate Total	9	3.9%	604	1.7%	59	25.3%	5,391	14.8%
Middle	144	61.8%	17,706	48.8%	61	26.2%	8,091	22.3%
Upper	80	34.3%	18,004	49.6%	107	45.9%	22,312	61.4%
Unknown	0	0.0%	0	0.0%	6	2.6%	520	1.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	233	100.0%	36,314	100.0%	233	100.0%	36,314	100.0%
Total	233	100.070	30,314		nance	100.070	30,314	100.070
Low	0	0.0%	0	0.0%	2	1.4%	99	0.5%
Moderate	3	2.1%	82	0.4%	30	21.0%	2,584	11.8%
Low/Moderate Total	3	2.1%	82	0.4%	32	22.4%	2,683	12.2%
Middle	95	66.4%	11,959	54.5%	19	13.3%	2,375	10.8%
Upper	45	31.5%	9,891	45.1%	85	59.4%	15,937	72.7%
Unknown	0	0.0%	0	0.0%	7	4.9%	937	4.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	143	100.0%	21,932	100.0%	143	100.0%	21,932	100.0%
					provement		,	
Low	0	0.0%	0	0.0%	1	16.7%	6	0.5%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	16.7%	6	0.5%
Middle	3	50.0%	534	46.1%	1	16.7%	176	15.2%
Upper	3	50.0%	624	53.9%	3	50.0%	776	67.0%
Unknown	0	0.0%	0	0.0%	1	16.7%	200	17.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	1,158	100.0%	6	100.0%	1,158	100.0%
				Multi-	Family			
Low	3	60.0%	422	35.1%	0	0.0%	0	0.0%
Moderate	1	20.0%	231	19.2%	0	0.0%	0	0.0%
Low/Moderate Total	4	80.0%	653	54.3%	0	0.0%	0	0.0%
Middle	1	20.0%	550	45.7%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	5	100.0%	1,203	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	1,203	100.0%	5	100.0%	1,203	100.0%
				HMDA	Totals			
Low	4	1.0%	450	0.7%	19	4.9%	1,311	2.2%
Moderate	12	3.1%	889	1.5%	73	18.9%	6,769	11.2%
Low/Moderate Total	16	4.1%	1,339	2.2%	92	23.8%	8,080	13.3%
Middle	243	62.8%	30,749	50.7%	81	20.9%	10,642	17.6%
Upper	128	33.1%	28,519	47.1%	195	50.4%	39,025	64.4%
Unknown	0	0.0%	0	0.0%	19	4.9%	2,860	4.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	387	100.0%	60,607	100.0%	387	100.0%	60,607	100.0%
								_

<sup>\*</sup>Information based on 2010 ACS data

#### **CRA Loan Distribution Table**

Exam: State Bank, Defiance 2018

Assessment Area/Group: Toledo MSA 2015 and 2016

		SMALL E	USINESS			SMALL	FARM		SMALL BU	US. SECURI	ED BY REAL ES	TATE
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
						By Tract						
Low	14	11.6%	2,212	7.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	11	9.1%	3,340	11.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	25	20.7%	5,552	19.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	47	38.8%	10,619	37.7%	13	86.7%	1,141	73.9%	3	42.9%	587	48.2%
Upper	49	40.5%	11,959	42.5%	2	13.3%	404	26.1%	4	57.1%	632	51.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	121	100.0%	28,130	100.0%	15	100.0%	1,545	100.0%	7	100.0%	1,219	100.0%
						By Rev	enue					
Total \$1 Million or Less	53	43.8%	8,358	29.7%	13	86.7%	1,207	78.1%	6	85.7%	969	79.5%
Over \$1 Million	68	56.2%	19,772	70.3%	2	13.3%	338	21.9%	1	14.3%	250	20.5%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	121	100.0%	28,130	100.0%	15	100.0%	1,545	100.0%	7	100.0%	1,219	100.0%
						By Loan	n Size					
\$100,000 or less	52	43.0%	2,998	10.7%	9	60.0%	404	26.1%	3	42.9%	202	16.6%
\$100,001 - \$250,000	36	29.8%	6,439	22.9%	5	33.3%	853	55.2%	3	42.9%	717	58.8%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	33	27.3%	18,693	66.5%	1	6.7%	288	18.6%	1	14.3%	300	24.6%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	121	100.0%	28,130	100.0%	15	100.0%	1,545	100.0%	7	100.0%	1,219	100.0%
					By Loan	Size and Rever	ue \$1 Million or	Less				_
\$100,000 or less	31	58.5%	1,632	19.5%	8	61.5%	354	29.3%	3	50.0%	202	20.8%
\$100,001 - \$250,000	14	26.4%	2,551	30.5%	5	38.5%	853	70.7%	2	33.3%	467	48.2%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	15.1%	4,175	50.0%	0	0.0%	0	0.0%	1	16.7%	300	31.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	53	100.0%	8,358	100.0%	13	100.0%	1,207	100.0%	6	100.0%	969	100.0%

<sup>\*</sup>Information based on 2010 ACS data

Selected Year: 2016

# **Peer Group HMDA Loan Distribution Table**

Exam ID: State Bank, Defiance 2018

Toledo OH MSA 2016

				H	MDA			
		By Tr	act Income		ľ	By Borro	ower Income	
	#	%	\$(000s)	%	#	%	\$(000s)	%
				Home	Purchase			
Low	86	0.99%	6,884	0.56%	668	7.71%	47,233	3.85%
Moderate	589	6.8%	46,514	3.79%	1,766	20.39%	166,806	13.6%
Low/Moderate Total	675	7.79%	53,398	4.35%	2,434	28.1%	214,039	17.46%
Middle	4,272	49.31%	479,381	39.1%	2,146	24.77%	272,112	22.19%
Upper	3,716	42.9%	693,377	56.55%	3,021	34.87%	602,416	49.13%
Unknown	0	0.0%	0	0.0%	1,062	12.26%	137,589	11.22%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8,663	100.0%	1,226,156	100.0%	8,663	100.0%	1,226,156	100.0%
		•	•	Refi	nance			
Low	53	1.0%	3,607	0.49%	307	5.78%	22,279	3.04%
Moderate	337	6.34%	26,375	3.6%	663	12.48%	58,398	7.97%
Low/Moderate Total	390	7.34%	29,982	4.09%	970	18.26%	80,677	11.01%
Middle	2,456	46.23%	274,823	37.52%	1,084	20.4%	118,348	16.16%
Upper	2,467	46.43%	427,676	58.39%	2,387	44.93%	410,872	56.09%
Unknown	0	0.0%	0	0.0%	872	16.41%	122,584	16.74%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5,313	100.0%	732,481	100.0%	5,313	100.0%	732,481	100.0%
		_		Home In	provement			-
Low	38	4.2%	423	0.88%	95	10.5%	2,069	4.31%
Moderate	98	10.83%	2,316	4.83%	180	19.89%	4,926	10.27%
Low/Moderate Total	136	15.03%	2,739	5.71%	275	30.39%	6,995	14.58%
Middle	469	51.82%	21,288	44.36%	242	26.74%	9,861	20.55%
Upper	300	33.15%	23,959	49.93%	344	38.01%	27,733	57.79%
Unknown	0	0.0%	0	0.0%	44	4.86%	3,397	7.08%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	905	100.0%	47,986	100.0%	905	100.0%	47,986	100.0%
				Multi	-Family			
Low	11	10.89%	25,476	19.08%	0	0.0%	0	0.0%
Moderate	27	26.73%	17,213	12.89%	0	0.0%	0	0.0%
Low/Moderate Total	38	37.62%	42,689	31.98%	0	0.0%	0	0.0%
Middle	44	43.56%	65,117	48.78%	0	0.0%	0	0.0%
Upper	19	18.81%	25,687	19.24%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	101	100.0%	133,493	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	101	100.0%	133,493	100.0%	101	100.0%	133,493	100.0%
			i	HMD	A Totals			
Low	188	1.25%	36,390	1.7%	1,070	7.14%	71,581	3.34%
Moderate	1,051	7.02%	92,418	4.32%	2,609	17.41%	230,130	10.75%
Low/Moderate Total	1,239	8.27%	128,808	6.02%	3,679	24.56%	301,711	14.1%
Middle	7,241	48.33%	840,609	39.28%	3,472	23.17%	400,321	18.71%
Upper	6,502	43.4%	1,170,699	54.7%	5,752	38.39%	1,041,021	48.64%
Unknown	0	0.0%	0	0.0%	2,079	13.88%	397,063	18.55%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14,982	100.0%	2,140,116	100.0%	14,982	100.0%	2,140,116	100.0%

#### Peer Group CRA Loan Distribution Table

Exam ID: State Bank, Defiance 2018

Selected Year: 2016

#### Toledo OH MSA 2016

		SMALL	BUSINESS			SMAI	LL FARM		SMALL I	BUS. SECU	RED BY REAL ES	TATE
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
		By Tra	ct Income			By Tr	act Income			By Tr	act Income	
Low	393	4.47%	25,341	6.23%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	922	10.49%	48,719	11.98%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Income	1,315	14.96%	74,060	18.21%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3,781	43.01%	189,645	46.64%	362	82.46%	40,733	84.09%	0	0.0%	0	0.0%
Upper	3,590	40.83%	141,238	34.74%	77	17.54%	7,705	15.91%	0	0.0%	0	0.0%
Unknown	1	0.01%	4	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	105	1.19%	1,647	0.41%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8,792	100%	406, 594	100%	439	100%	48,438	100%	0	0.0%	0	0.0%
		By I	Revenue			By	Revenue			Ву	Revenue	
Total \$1 Million or Less	3,883	44.17%	136,095	33.47%	317	72.21%	37,134	76.66%	0	0.0%	0	0.0%
		By L	oan Size	•	•	By I	oan Size	•	<u>-</u> '	By I	Loan Size	
\$100,000 or Less	8,023	91.25%	135,416	33.3%	285	64.92%	10,670	22.03%	0	0.0%	0	0.0%
\$100,001 - \$250,000	407	4.63%	72,241	17.77%	96	21.87%	16,464	33.99%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	362	4.12%	198,937	48.93%	58	13.21%	21,304	43.98%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8,792	100%	406,594	100%	439	100%	48,438	100%	0	0.0%	0	0.0%

# **FORT WAYNE MSA**

#### **HMDA Loan Distribution Table**

Exam: State Bank, Defiance 2018

Assessment Area/Group : Fort Wayne MSA 2015 and 2016

				HM	IDA			
			t Income				ver Income	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
Y	1	1.5%	l 66	0.7%	Purchase	13.6%	692	6.9%
Low Moderate	2	3.0%	66 350	3.5%	17	25.8%	1,825	18.1%
Low/Moderate Total	3	4.5%	416	4.1%	26	39.4%	2,517	25.0%
Middle	33	50.0%	3,676	36.4%	15	22.7%	2,179	21.6%
Upper	30	45.5%	5,995	59.4%	23	34.8%	5,231	51.9%
Unknown	0	0.0%	0	0.0%	2	3.0%	160	1.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	66	100.0%	10,087	100.0%	66	100.0%	10,087	100.0%
Low	0	0.0%	I 0	0.0%	nance 0	0.0%	0	0.0%
			-		-			
Moderate	3	7.1%	266	3.1%	6	14.3%	768	9.0%
Low/Moderate Total		7.1%	266	3.1%	6	14.3%	768	9.0%
Middle	15	35.7%	3,038	35.6%	11	26.2%	1,522	17.9%
Upper	24	57.1%	5,222	61.2%	25	59.5%	6,236	73.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	42	100.0%	8,526	100.0%	42	100.0%	8,526	100.0%
T	0	0.0%	0	Home Im 0.0%	provement 0	0.0%	0	1 0.00/
Low								0.0%
Moderate	1	33.3%	50	11.1%	0	0.0%	0	0.0%
Low/Moderate Total	1	33.3%	50	11.1%	0	0.0%	0	0.0%
Middle	2	66.7%	402	88.9%	1	33.3%	50	11.1%
Upper	0	0.0%	0	0.0%	2	66.7%	402	88.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	452	100.0%	3	100.0%	452	100.0%
-		1	I ^	Multi-		1	1 ^	1
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate		0.0%		0.0%		0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low	1	0.00/	l 66	HMDA	•	0 10/	602	2.00
Low	1	0.9%	66	0.3%	9	8.1%	692	3.6%
Moderate	6	5.4%	666	3.5%	23	20.7%	2,593	13.6%
Low/Moderate Total	7	6.3%	732	3.8%	32	28.8%	3,285	17.2%
Middle	50	45.0%	7,116	37.3%	27	24.3%	3,751	19.7%
Upper	54	48.6%	11,217	58.8%	50	45.0%	11,869	62.3%
Unknown	0	0.0%	0	0.0%	2	1.8%	160	0.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	111	100.0%	19,065	100.0%	111	100.0%	19,065	100.0%

<sup>\*</sup>Information based on 2010 ACS data

#### **CRA Loan Distribution Table**

#### Exam: State Bank, Defiance 2018

Assessment Area/Group: Fort Wayne MSA 2015 and 2016

		SMALL I	BUSINESS			SMALL	FARM		SMALL BU	JS. SECURI	ED BY REAL ES	TATE
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
						By Tract	Income					
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	3.8%	25	0.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	1	3.8%	25	0.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	7	26.9%	1,180	19.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	18	69.2%	4,719	79.7%	5	100.0%	158	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	5,924	100.0%	5	100.0%	158	100.0%	0	0.0%	0	0.0%
						By Rev	enue					-
Total \$1 Million or Less	17	65.4%	3,563	60.1%	5	100.0%	158	100.0%	0	0.0%	0	0.0%
Over \$1 Million	9	34.6%	2,361	39.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	5,924	100.0%	5	100.0%	158	100.0%	0	0.0%	0	0.0%
						By Loa	n Size					
\$100,000 or less	11	42.3%	686	11.6%	5	100.0%	158	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	5	19.2%	794	13.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	10	38.5%	4,444	75.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	5,924	100.0%	5	100.0%	158	100.0%	0	0.0%	0	0.0%
			-		By Loan	Size and Rever	ue \$1 Million or	Less				
\$100,000 or less	6	35.3%	416	11.7%	5	100.0%	158	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	5	29.4%	794	22.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	35.3%	2,353	66.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	3,563	100.0%	5	100.0%	158	100.0%	0	0.0%	0	0.0%

<sup>\*</sup>Information based on 2010 ACS data

Selected Year: 2016

# **Peer Group HMDA Loan Distribution Table**

Exam ID: State Bank, Defiance 2018

Fort Wayne, IN MSA 2016

		HMDA									
		By Tra	act Income			By Borro	ower Income				
	#	%	\$(000s)	%	#	%	\$(000s)	%			
T	112	Home Purchase									
Low				0.56%	859	1	65,716	5.13%			
Moderate	1,255	13.95%	103,945	8.11%	1,974	21.95%	201,829	15.75%			
Low/Moderate Total Middle	1,367	15.2%	111,072	8.67%	2,833	31.5%	267,545	20.88%			
	3,762	41.83%	436,756	34.09%	1,851	20.58%	250,364	19.54%			
Upper	3,865	42.97%	733,475	57.24%	2,786	30.98%	579,606	45.24%			
Unknown	0	0.0%	0	0.0%	1,524	16.94%	183,788	14.34%			
Tract Unknown	0	0.0%	0	0.0%	0 8.994	0.0%	0	0.0%			
Total	8,994	8,994 100.0%		1,281,303 100.0%		100.0%	1,281,303	100.0%			
		1		nance							
Low	54	1.04%	8,374	1.17%	310	5.97%	21,603	3.02%			
Moderate	603	11.61%	51,202	7.17%	714	13.75%	60,971	8.53%			
Low/Moderate Total	657	12.65%	59,576	8.34%	1,024	19.72%	82,574	11.56%			
Middle	2,074	39.94%	231,813	32.44%	975	18.78%	109,253	15.29%			
Upper	2,462	47.41%	423,123	59.22%	2,056	39.59%	364,061	50.95%			
Unknown	0	0.0%	0	0.0%	1,138	21.91%	158,624	22.2%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	5,193	100.0%	714,512	100.0%	5,193	100.0%	714,512	100.0%			
		Home Improvement									
Low	31	3.41%	497	0.95%	72	7.92%	1,874	3.59%			
Moderate	144	15.84%	4,471	8.56%	210	23.1%	7,560	14.47%			
Low/Moderate Total	175	19.25%	4,968	9.51%	282	31.02%	9,434	18.06%			
Middle	396	43.56%	18,893	36.17%	225	24.75%	11,234	21.51%			
Upper	337	37.07%	28,362	54.3%	373	41.03%	29,643	56.75%			
Unknown	1	0.11%	13	0.02%	29	3.19%	1,925	3.69%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	909	909 100.0%		100.0%	100.0% 909		52,236	100.0%			
	909 100.0% 52,236 100.0% 909 100.0% 52,236 100.  Multi-Family										
Low	1	5.88%	5,269	10.29%	0	0.0%	0	0.0%			
Moderate	5	29.41%	20,514	40.07%	0	0.0%	0	0.0%			
Low/Moderate Total	6	35.29%	25,783	50.36%	0	0.0%	0	0.0%			
Middle	8	47.06%	4,435	8.66%	0	0.0%	0	0.0%			
Upper	3	17.65%	20,980	40.98%	0	0.0%	0	0.0%			
Unknown	0	0.0%	0	0.0%	17	100.0%	51,198	100.0%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	17	100.0%	51,198	100.0%	17	100.0%	51,198	100.0%			
		HMDA Totals									
Low	198	1.31%	21,267	1.01%	1,241	8.21%	89,193	4.25%			
Moderate	2,007	13.28%	180,132	8.58%	2,898	19.18%	270,360	12.88%			
Low/Moderate Total	2,205	14.59%	201,399	9.59%	4,139	27.39%	359,553	17.13%			
Middle	6,240	41.29%	691,897	32.96%	3,051	20.19%	370,851	17.67%			
Upper	6,667	44.11%	1,205,940	57.45%	5,215	34.51%	973,310	46.36%			
Unknown	1	0.01%	13	0.0%	2,708	17.92%	395,535	18.84%			
Tract Unknown	0	0.01%	0	0.0%	0	0.0%	0	0.0%			
Total	15,113	100.0%	2,099,249	100.0%	15,113	100.0%	2,099,249	100.0%			

#### Peer Group CRA Loan Distribution Table

Exam ID: State Bank, Defiance 2018

Selected Year: 2016

#### Fort Wayne, IN MSA 2016

		SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%	
	By Tract Income				By Tract Income				By Tract Income				
Low	573	8.63%	43,091	11.72%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	1,328	19.99%	77,135	20.98%	2	0.99%	46	0.25%	0	0.0%	0	0.0%	
Low/Moderate Income	1,901	28.62%	120,226	32.7%	2	0.99%	46	0.25%	0	0.0%	0	0.0%	
Middle	2,405	36.2%	138,968	37.79%	127	62.56%	12,972	71.43%	0	0.0%	0	0.0%	
Upper	2,246	33.81%	106,154	28.87%	73	35.96%	5,138	28.29%	0	0.0%	0	0.0%	
Unknown	20	0.3%	1,188	0.32%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Tract Unknown	71	1.07%	1,158	0.31%	1	0.49%	5	0.03%	0	0.0%	0	0.0%	
Total	6,643	100%	367,694	100%	203	100%	18,161	100%	0	0.0%	0	0.0%	
		By Revenue				By I	Revenue	By Revenue					
Total \$1 Million or Less	2,747	41.35%	106,551	28.98%	141	69.46%	13,992	77.04%	0	0.0%	0	0.0%	
	By Loan Size				By Loan Size				By Loan Size				
\$100,000 or Less	5,926	89.21%	105,244	28.62%	152	74.88%	5,126	28.23%	0	0.0%	0	0.0%	
\$100,001 - \$250,000	346	5.21%	61,180	16.64%	33	16.26%	6,321	34.81%	0	0.0%	0	0.0%	
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	371	5.58%	201,270	54.74%	18	8.87%	6,714	36.97%	0	0.0%	0	0.0%	
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	6,643	100%	367,694	100%	203	100%	18,161	100%	0	0.0%	0	0.0%	

### **APPENDIX E**

# **COLUMBUS MSA**

# **BRANCH DISTRIBUTION**

#### Geographic Distribution of Branches

Analysis Year: 2016

Exam: State Bank, Defiance 2018

Assessment Area(s): Columbus, OH MSA 2016

				BRA	NCHES					DEMOC	FRAPHICS		
Tract Income Levels	То	otal Bran	ches	Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census	Tracts	Households	Total Businesses	
		#	%	#	#	#	#	#	#	%		%	
	Total	0	0.0%	0	0	0	0	0					
Low	DTO	0		0	0	0			60	18.9%	13.7%	9.3%	
	LS	0		0	0			L					
	Total	0	0.0%	0	0	0	0	0					
Moderate	DTO	0		0	0	0			76	24.0%	20.9%	18.0%	
	LS	0		0	0								
	Total	1	100.0%	1	0	0	0	0					
Middle	DTO	0		0	0	0			81	25.6%	30.4%	26.5%	
	LS	0		0	0								
	Total	0	0.0%	0	0	0	0	0					
Upper	DTO	0		0	0	0			98	30.9%	35.0%	45.8%	
	LS	0		0	0								
	Total	0	0.0%	0	0	0	0	0					
Unknown	DTO	0		0	0	0			2	0.6%	0.0%	0.4%	
	LS	0		0	0				2				
	Total	1	100.0%	1	0	0	0	0					
Totals	DTO	0		0	0	0			317	100.0%	6 100.0%	100.0%	
	LS	0		0	0								

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows \*Closed branches are only included in the \*Closed\* columns and are not included in any other totals

LPOs not included in totals.

Exam: State Bank, Defiance 2018 Analysis Year: 2016

Assessment Area(s): Columbus, OH MSA 2016

						ATMS							DEMO	GRAPHICS	
Tract Income Levels	Tot	tal ATMS			Full S	Service	,		Casl	h Only	,	Census	Tracts	GRAPHICS Households  96 13.7% 20.9% 30.4% 35.0%	Total Businesses
		Total	%	Total	%	Opened	Closed	Total	%	Opened	Closed	#	%	%	%
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	60	18.9%	13.7%	9.3%
Low	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	76	24.0%	20.9%	18.0%
Moderate	Stand Alone	0		0		0	0	0		0	0				
	Total	1	100.0%	1	100.0%	1	0	0	0.0%	0	0	81	25.6%	30.4%	26.5%
Middle	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	98	30.9%	35.0%	45.8%
Upper	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	2	0.6%	0.0%	0.4%
Unknown	Stand Alone	0		0		0	0	0		0	0				
	Total	1	100.0%	1	100.0%	1	0	0	0.0%	0	0	317	100.0%	100.0%	100.0%
Totals	Stand Alone	0		0		0	0	0		0	0				

# **NON-METROPOLITAN OHIO**

# Geographic Distribution of Branches

Analysis Year: 2016

Exam: State Bank, Defiance 2018

Assessment Area(s): Non MSA OH 2016

				BRA	ANCHES					DEMOC	GRAPHICS	
Tract Income Levels	То	otal Bran	ches	Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census	s Tracts	Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
	Total	0	0.0%	0	0	0	0	0				
Low	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
	Total	1	12.5%	0	0	0	0	0				
Moderate	DTO	0		0	0	0			6	10.0%	9.6%	10.5%
	LS	0		0	0							
	Total	5	62.5%	0	0	0	0	0				
Middle	DTO	0		0	0	0			36	60.0%	56.6%	54.2%
	LS	0		0	0							
	Total	2	25.0%	0	0	0	0	0				
Upper	DTO	0		0	0	0			18	30.0%	33.8%	35.3%
	LS	0		0	0							
	Total	0	0.0%	0	0	0	0	0				
Unknown	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
	Total	8	100.0%	0	0	0	0	0				
Totals	DTO	0		0	0	0			60	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

<sup>\*</sup>Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

Exam: State Bank, Defiance 2018 Analysis Year: 2016

Assessment Area(s): Non MSA OH 2016

						ATMS							DEMO	GRAPHICS	
Tract Income Levels	Tot	tal ATMS			Full S	Service			Casl	h Only	,	Census	Tracts	GRAPHICS  Households  96  0.0%  9.6%  56.6%  33.8%  0.0%	Total Businesses
		Total	%	Total	%	Opened	Closed	Total	%	Opened	Closed	#	%	%	%
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
Low	Stand Alone	0		0		0	0	0		0	0				
	Total	2	13.3%	2	16.7%	0	0	0	0.0%	0	0	6	10.0%	9.6%	10.5%
Moderate	Stand Alone	1		1		0	0	0		0	0				
	Total	9	60.0%	7	58.3%	0	0	2	66.7%	0	0	36	60.0%	56.6%	54.2%
Middle	Stand Alone	4		2		0	0	2		0	0				
	Total	4	26.7%	3	25.0%	0	0	1	33.3%	0	0	18	30.0%	33.8%	35.3%
Upper	Stand Alone	2		1		0	0	1		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
Unknown	Stand Alone	0		0		0	0	0		0	0				
	Total	15	100.0%	12	100.0%	0	0	3	100.0%	0	0	60	100.0%	100.0%	100.0%
Totals	Stand Alone	7		4		0	0	3		0	0				

# **LIMA MSA**

# Geographic Distribution of Branches

Analysis Year: 2016

Exam: State Bank, Defiance 2018

Assessment Area(s): Lima, OHMSA 2016

				BRA	NCHES					DEMO	GRAPHICS	
Tract Income Levels  Low  Moderate  Middle  Upper  Unknown	То	tal Bran	ches	Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census	s Tracts	Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
	Total	1	100.0%	0	0	0	0	0				
Low	DTO	0		0	0	0			5	15.2%	9.3%	14.9%
	LS	0		0	0							
	Total	0	0.0%	0	0	0	0	0				
Moderate	DTO	0		0	0	0			6	18.2%	13.9%	11.0%
	LS	0		0	0							
	Total	0	0.0%	0	0	0	0	0				
Middle	DTO	0		0	0	0			16	48.5%	49.5%	47.8%
	LS	0		0	0							
	Total	0	0.0%	0	0	0	0	0				
Upper	DTO	0		0	0	0			6	18.2%	27.3%	26.2%
	LS	0		0	0							
	Total	0	0.0%	0	0	0	0	0				
Unknown	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
	Total	1	100.0%	0	0	0	0	0				
Totals	DTO	0		0	0	0			33	100.0%	100.0%	100.0%
	LS	0		0	0						9.3% 9.3% 13.9% 49.5% 27.3%	

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

<sup>\*</sup>Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

Exam: State Bank, Defiance 2018 Analysis Year: 2016

Assessment Area(s): Lima, OHMSA 2016

						ATMS							DEMO	GRAPHICS	
Tract Income Levels	То	tal ATMS			Full S	Service			Casl	h Only	,	Census	Tracts	Households	Total Businesses
		Total	%	Total	%	Opened	Closed	Total	%	Opened	Closed	#	%	%	%
	Total	1	100.0%	1	100.0%	0	0	0	0.0%	0	0	5	15.2%	9.3%	14.9%
Low	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	6	18.2%	13.9%	11.0%
Moderate	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	16	48.5%	49.5%	47.8%
Middle	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	6	18.2%	27.3%	26.2%
Upper	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
Unknown	Stand Alone	0		0		0	0	0		0	0				
	Total	1	100.0%	1	100.0%	0	0	0	0.0%	0	0	33	100.0%	100.0%	100.0%
Totals	Stand Alone	0		0		0	0	0		0	0				

### **TOLEDO MSA**

# Geographic Distribution of Branches

Analysis Year: 2016

Exam: State Bank, Defiance 2018

Assessment Area(s): Toledo OH MSA 2016

				BRA	ANCHES					DEMOC	GRAPHICS	
Tract Income Levels	To	otal Brand	ches	Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census	s Tracts	Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
	Total	0	0.0%	0	0	0	0	0				
Low	DTO	0		0	0	0			27	16.2%	9.5%	6.3%
	LS	0		0	0							
	Total	0	0.0%	0	0	0	0	0				
Moderate	DTO	0		0	0	0			30	18.0%	17.3%	13.5%
	LS	0		0	0							
	Total	7	87.5%	1	0	0	0	0				
Middle	DTO	0		0	0	0			72	43.1%	46.9%	45.8%
	LS	0		0	0							
	Total	1	12.5%	0	0	0	0	0				
Upper	DTO	0		0	0	0			36	21.6%	26.3%	34.3%
	LS	0		0	0							
	Total	0	0.0%	0	0	0	0	0				
Unknown	DTO	0		0	0	0			2	1.2%	0.0%	0.1%
	LS	0		0	0							
	Total	8	100.0%	1	0	0	0	0				
Totals	DTO	0		0	0	0			167	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only

\*Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

Exam: State Bank, Defiance 2018 Analysis Year: 2016

Assessment Area(s): Toledo OH MSA 2016

						ATMS							DEMO	GRAPHICS	
Tract Income Levels	То	tal ATMS			Full S	Service			Casl	h Only	,	Census	Tracts	Households	Total Businesses
		Total	%	Total	%	Opened	Closed	Total	%	Opened	Closed	#	%	%	%
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	27	16.2%	9.5%	6.3%
Low	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	30	18.0%	17.3%	13.5%
Moderate	Stand Alone	0		0		0	0	0		0	0				
	Total	6	85.7%	6	85.7%	1	0	0	0.0%	0	0	72	43.1%	46.9%	45.8%
Middle	Stand Alone	0		0		0	0	0		0	0				
	Total	1	14.3%	1	14.3%	0	0	0	0.0%	0	0	36	21.6%	26.3%	34.3%
Upper	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	2	1.2%	0.0%	0.1%
Unknown	Stand Alone	0		0		0	0	0		0	0				
	Total	7	100.0%	7	100.0%	1	0	0	0.0%	0	0	167	100.0%	100.0%	100.0%
Totals	Stand Alone	0		0		0	0	0		0	0				

# **FORT WAYNE MSA**

# Geographic Distribution of Branches

Analysis Year: 2016

Exam: State Bank, Defiance 2018

Assessment Area(s): Fort Wayne, IN MSA 2016

				BRA	ANCHES					DEMOC	GRAPHICS	
Tract Income Levels	То	otal Bran	ches	Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census	s Tracts	Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
	Total	0	0.0%	0	0	0	0	0				
Low	DTO	0		0	0	0			13	12.4%	7.9%	9.1%
	LS	0		0	0							
	Total	0	0.0%	0	0	0	0	0				
Moderate	DTO	0		0	0	0			28	26.7%	26.1%	21.7%
	LS	0		0	0							
	Total	0	0.0%	0	0	0	0	0				
Middle	DTO	0		0	0	0			38	36.2%	39.1%	37.5%
	LS	0		0	0							
	Total	1	100.0%	0	0	0	0	0				
Upper	DTO	0		0	0	0			25	23.8%	26.9%	31.5%
	LS	0		0	0							
	Total	0	0.0%	0	0	0	0	0				
Unknown	DTO	0		0	0	0			1	1.0%	0.0%	0.3%
	LS	0		0	0							
	Total	1	100.0%	0	0	0	0	0				
Totals	DTO	0		0	0	0			105	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

\*Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

Exam: State Bank, Defiance 2018 Analysis Year: 2016

Assessment Area(s): Fort Wayne, IN MSA 2016

						ATMS							DEMO	GRAPHICS	
Tract Income Levels	То	tal ATMS			Full S	Service	i		Casl	n Only		Census	Tracts	Households	Total Businesses
		Total	%	Total	%	Opened	Closed	Total	%	Opened	Closed	#	%	%	%
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	13	12.4%	7.9%	9.1%
Low	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	28	26.7%	26.1%	21.7%
Moderate	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	38	36.2%	39.1%	37.5%
Middle	Stand Alone	0		0		0	0	0		0	0				
	Total	1	100.0%	1	100.0%	0	0	0	0.0%	0	0	25	23.8%	26.9%	31.5%
Upper	Stand Alone	0		0		0	0	0		0	0				
	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	1.0%	0.0%	0.3%
Unknown	Stand Alone	0		0		0	0	0		0	0				
	Total	1	100.0%	1	100.0%	0	0	0	0.0%	0	0	105	100.0%	100.0%	100.0%
Totals	Stand Alone	0		0		0	0	0		0	0				

#### **APPENDIX F**

#### **GLOSSARY OF TERMS**

**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: All Agencies have adopted the following language. 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.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or,
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

**Full-scope review:** Performance under the Lending, Investment, and Service Tests 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 refinancing's 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 under the Lending, Investment, and Service Tests 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.

**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) and the Thrift Financial Reporting (TFR) 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 Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**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.