

PUBLIC DISCLOSURE

February 3, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The North Side Bank and Trust Company
RSSD #615217

4125 Hamilton Avenue
Cincinnati, Ohio 45223

Federal Reserve Bank of Cleveland
1455 E. 6th Street
Cleveland, Ohio 44114

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: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors and criteria contributing to this rating include:

- The loan-to-deposit ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs;
- A majority of loans and other lending-related activities are within the assessment area;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income individuals) and a reasonable penetration to businesses of different revenue sizes given the demographics of the assessment areas;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area;
- There were no CRA-related complaints filed against the bank since the previous CRA examination; and,
- The bank's community development performance demonstrates an excellent responsiveness to the community development needs of the assessment area, considering the bank's capacity, and the need and availability of such opportunities in the bank's assessment area.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination procedure for Intermediate Small Institutions was utilized to evaluate The North Side Bank and Trust Company's (North Side's) Community Reinvestment Act (CRA) performance under Regulation BB. The evaluation considered CRA performance context, including North Side's asset size, financial condition, business strategy and market competition, as well as assessment area demographic and economic characteristics, and credit needs. Under the lending test, lending performance was evaluated from January 1, 2016, through December 31, 2018, for closed end residential mortgage (home purchase, refinance, and home improvement) and was evaluated January 1, 2018, through December 31, 2018, for small business and consumer (motor vehicle, other secured, and unsecured) loans. Under the community development test, community development activities funded from June 6, 2016, through February 3, 2020, were evaluated.

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 amended the Home Mortgage Disclosure Act (HMDA) to add new data points. These changes were effective January

1, 2018, and included the reporting of home equity lines of credit for certain institutions, the addition of new loan purposes, and changes to the definitions of some existing fields. Due to the breadth of these changes, HMDA-reportable loans originated or purchased on or after January 1, 2018, are separated from loans made before that date.

The following table shows the volume and distribution of loans originated within North Side's assessment area during the evaluation period:

| Loan Type | Number of Loans | Dollar Amount of Loans (000s) |
|--------------------------|------------------------|------------------------------------------|
| Small Business | 404 | \$109,383 |
| Home Improvement | 152 | \$3,894 |
| Home Purchase | 107 | \$18,261 |
| Other Purpose Closed-End | 8 | \$511 |
| Refinance | 91 | \$12,481 |
| Motor Vehicle | 55 | \$854 |
| Other-Secured | 30 | \$503 |
| Other-Unsecured | 25 | \$226 |
| Total | 872 | \$146,113 |

In some cases, information for originated loans could not be provided by the bank. Therefore, the loan volumes used for borrower distribution are based on a sample of originated loans and are lower than the number of originated loans listed above.

Geographic and borrower distribution received equal weight in this evaluation primarily because the percentage of low- and moderate-income geographies was similar to the percentage of families by family income in the assessment area.

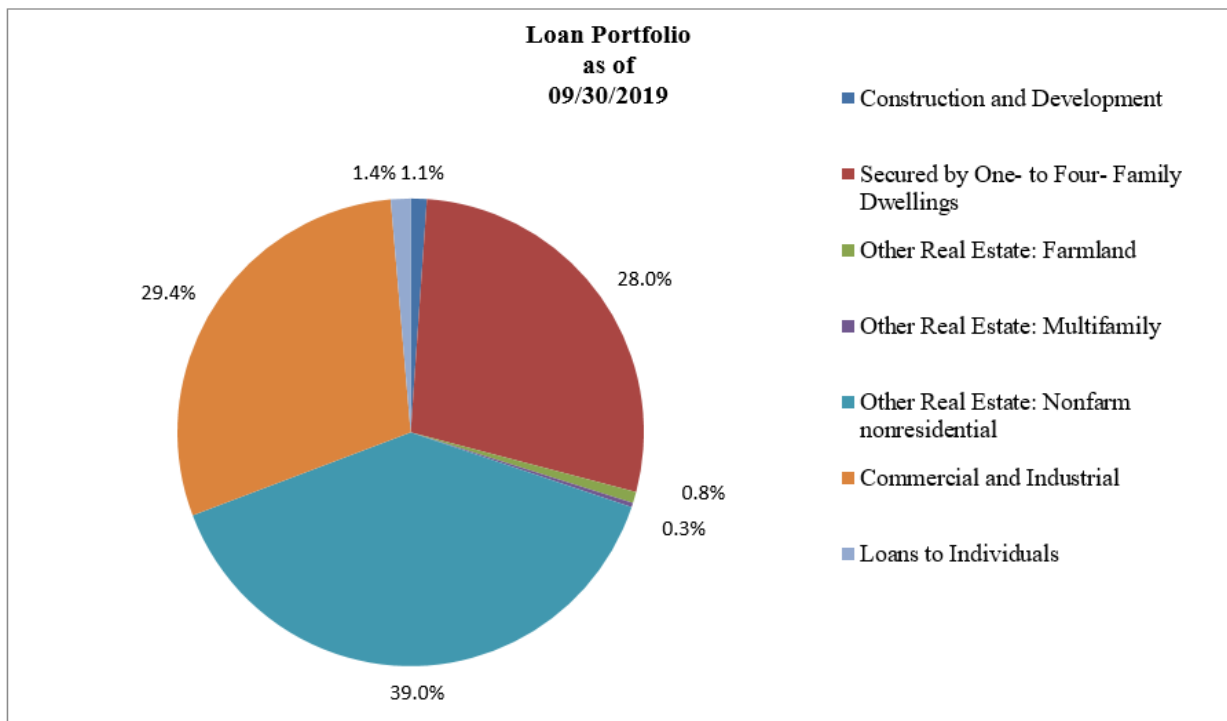
Based on the total loan volume by number and dollar amounts available, small business loans received the greatest weight in the geographic distribution, followed by HMDA (home purchase, home improvement, refinance), and consumer (motor vehicle, other secured, and other unsecured) loans. However, since revenues were not available for a majority of small business loans, including all of the commercial credit cards, small business loans were given little weight in the borrower distribution.

North Side's lending performance also was compared to the performance of aggregate of all lenders in 2016, 2017, and 2018. Aggregate of all lenders include all lenders required to report HMDA-reportable data in the respective assessment areas.

DESCRIPTION OF THE INSTITUTION

North Side is an independently-owned community bank headquartered in Cincinnati, Ohio, and has total assets of \$715 million as of September 30, 2019. In addition to its main office in Cincinnati, Ohio (Hamilton County), the bank has eight other branches. The main office and seven branches are in Hamilton County with one branch office in a moderate-income census tract. The remaining branch is in West Chester (Butler County), Ohio. Each branch has a full-service Automated Teller Machine (ATM). Since the previous evaluation, North Side has not closed any branch offices or ATMs. On July 5, 2016, North Side opened its ninth branch office. This office is located in Cincinnati's Mount Adams Community in Hamilton County.

| COMPOSITION OF LOAN PORTFOLIO | | | | | | |
|-------------------------------------------|------------------|----------------|------------------|----------------|------------------|----------------|
| Loan Type | 9/30/2019 | | 12/31/2018 | | 12/31/2017 | |
| | \$ (000s) | Percent | \$ (000s) | Percent | \$ (000s) | Percent |
| Construction and Development | 5,736 | 1.1% | 5,323 | 1.1% | 5,609 | 1.3% |
| Secured by One- to Four- Family Dwellings | 144,625 | 28.0% | 124,323 | 24.7% | 95,893 | 22.5% |
| Other Real Estate: Farmland | 3,998 | 0.8% | 4,100 | 0.8% | 4,186 | 1.0% |
| Other Real Estate: Multifamily | 1,555 | 0.3% | 1,651 | 0.3% | 2,248 | 0.5% |
| Other Real Estate: Nonfarm nonresidential | 201,570 | 39.0% | 199,210 | 39.6% | 174,135 | 40.9% |
| Commercial and Industrial | 151,918 | 29.4% | 161,662 | 32.2% | 137,336 | 32.3% |
| Loans to Individuals | 7,061 | 1.4% | 6,414 | 1.3% | 5,944 | 1.4% |
| Agricultural Loans | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| <i>Total</i> | <i>\$516,463</i> | <i>100.00%</i> | <i>\$502,683</i> | <i>100.00%</i> | <i>\$425,351</i> | <i>100.00%</i> |



North Side was rated “Satisfactory” at its previous CRA performance evaluation (June 6, 2016). The lending and community development tests were each rated “Satisfactory.”

North Side’s investment portfolio as of September 30, 2019, was \$167 million, which represented 23.4% of total assets. Investments in U.S. Treasuries and agencies account for 58.7% of investments, while municipal securities and bank balances and federal funds sold comprise 9.4% and 30.5% of investments, respectively.

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

DESCRIPTION OF THE ASSESSMENT AREA

North Side has one delineated CRA assessment area in Ohio that includes the entirety of Hamilton County and a portion of Butler County. These counties are in the Cincinnati OH-KY-IN Metropolitan Statistical Area (MSA). The MSA is comprised of Dearborn, Ohio, and Union counties in Indiana; Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton counties

in Kentucky; and Brown, Butler, Clermont, Hamilton, and Warren counties in Ohio. See Appendix A for an assessment area map for details.

Due to changes in median family income levels resulting from changes in U.S. Census data, the assessment area had an increase in low-income census tracts by four and an increase in moderate-income census tracts by one. The following table shows the composition of census tracts for this evaluation:

| Tract Income Level | 2016* | 2017/2018** |
|------------------------------------------------------------------------------------|--------------|--------------------|
| Low | 43 | 47 |
| Moderate | 68 | 69 |
| Middle | 87 | 76 |
| Upper | 70 | 73 |
| Unknown | 0 | 3 |
| Total | 268 | 268 |
| * Main Office and Springdale branches are located in moderate-income census tracts | | |
| **Springdale branch is located in a moderate-income census tract | | |

North Side operates in a highly competitive banking environment with competition from several large and regional community banks. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report,¹ as of June 30, 2019, North Side ranked 13th out of 62 institutions with 0.4% of the deposit market share. The top five banks in this assessment area are U.S Bank National Association with 52.5%, Fifth Third Bank with 26.6%, PNC Bank, National Association with 5.0%, First Financial Bank with 2.8%, and The Huntington National Bank with 2.5%, respectively.

Community Contacts

There were two community contacts conducted as part of this evaluation to provide additional information regarding the credit needs and to help give context to demographic and economic conditions of the local community. The first contact, a representative from an economic development agency, stated there is a lack of support to small business owners from large banks and that most assistance comes from smaller community banks and credit unions. The contact indicated more access to capital is needed to help fund community development projects. Typically, rehabilitation of dilapidated housing stock and commercial buildings is cost-prohibitive and a major cost of revitalizing an area. The contact stated that while local banks are involved in the community, there is still a need for them to provide more funding and lower interest rates to

¹ FDIC Deposit Market Share; www.fdic.gov/sod

support community development projects and provide small business owners with small dollar working capital loans needed to retain or expand their businesses.

The second contact, a representative from an affordable housing agency, explained while the neighborhood is experiencing revitalization, the area is also undergoing gentrification. As a result, affordable housing is a significant need in the community; the area’s Section 8 housing choice voucher program has over 1,000 families needing assistance with wait lists as long as two or three years. The housing choice voucher program is the federal government’s major program for assisting very low-income families to afford decent housing in the private market. The contact stated that unfortunately there appears to be little incentive for landlords to offer affordable rates when they are able to get market rates in higher-rent areas. The contact stated there is a need for banks to provide credit counseling to low- and moderate-income individuals. These individuals need a chance to build their credit scores and gain access to checking accounts and credit cards and realize there is an alternative to pay day lenders. Another need for lower income individuals is reliable transportation. While the area has regional transit, it does not serve all areas of the county. As smaller banks get acquired by large financial institutions, branches located in lower income communities may get closed or relocated. As a result, it can be challenging for people in these communities to go to a bank branch that may no longer be as accessible to public transportation. The contact stated there is a need for financial institutions to maintain a branch presence in lower income communities, because communities with banks tend to stimulate more local economic development and homeownership in their communities.

Population Characteristics

According to 2015 census data, the population in the assessment area was 1,041,857, of which 12.4% reside in low-income tracts and 23.8% reside in moderate-income tracts. As shown in the table below, the population in the assessment area continues to outpace population growth in Ohio with Butler County experiencing the greatest increase in population since 2010. In addition, 76.1% of the population was 18 years of age or older, the legal age to enter into a contract, and 62.5% of the population are between the ages of 18 and 64 and more likely to have credit needs. The population age 65 years and over in Hamilton (13.9%) and Butler (12.7%) counties was less than Ohio’s at 15.1%.

| Population Change | | | | | |
|-------------------|-------------------|-------------------|--------------------------------------|-------------------|--------------------------------------|
| Area | 2010 Population | 2015 Population | Percent Change Between 2010 and 2015 | 2018 Population | Percent Change Between 2015 and 2018 |
| Butler County | 368,130 | 375,702 | 2.1% | 382,378 | 1.8% |
| Hamilton County | 802,374 | 808,703 | 0.8% | 816,684 | 1.0% |
| Ohio | 11,536,504 | 11,609,756 | 0.6% | 11,689,442 | 0.7% |

Income Characteristics

The 2015 median family income (\$68,497) in the assessment area was more than Ohio’s (\$62,817). As shown below, the assessment area median family income increased in the Cincinnati MSA in 2016, 2017, and 2018.

Borrower Income Levels
Cincinnati, OH-KY-IN #17140 - MSA

| HUD Estimated Median Family Income | | Low | | | Moderate | | | Middle | | | Upper | | |
|------------------------------------|-----------------|-----|---|----------|----------|---|----------|----------|---|----------|----------|---|---------|
| | | 0 | - | 49.99% | 50% | - | 79.99% | 80% | - | 119.99% | 120% | - | & above |
| 2016 | \$68,800 | 0 | - | \$34,399 | \$34,400 | - | \$55,039 | \$55,040 | - | \$82,559 | \$82,560 | - | & above |
| 2017 | \$73,600 | 0 | - | \$36,799 | \$36,800 | - | \$58,879 | \$58,880 | - | \$88,319 | \$88,320 | - | & above |
| 2018 | \$77,000 | 0 | - | \$38,499 | \$38,500 | - | \$61,599 | \$61,600 | - | \$92,399 | \$92,400 | - | & above |

Between 2016 and 2017, poverty rates in the assessment area decreased in Butler County and remained stable in Hamilton County. Between 2017 and 2018, the poverty rates increased in Butler County and decreased in Hamilton County. Poverty rates in Hamilton County were above Ohio and national poverty rates all three years.

Poverty Rates

| Area | Years | | |
|-----------------|-------------|-------------|-------------|
| | 2016 | 2017 | 2018 |
| Butler County | 12.4 | 10.7 | 12.4 |
| Hamilton County | 16.0 | 16.2 | 15.4 |
| Ohio | 14.5 | 13.9 | 13.8 |
| National | 14.0 | 13.4 | 13.1 |

According to 2015 census data, of the 418,324 households in this assessment area, 16.1% are below the poverty level, 3.3% are receiving public assistance, and 47.1% have rent costs greater than 30.0% of their monthly income. Of the households that are families, 12.4% are below the poverty level. Low- and moderate-income families represent 40.9% of all families in the assessment area, and low- and moderate-income households represent 44.0% of all households in this assessment area.

Housing Characteristics

According to 2015 census data, there are 471,602 housing units and 255,835 families in the assessment area. From an income perspective, 14.7% of total housing units, 10.8% of total

families, and 5.8% of total owner-occupied units are located in low-income tracts; and 25.1% of total housing units, 21.7% of total families, and 19.3% of total owner-occupied units are located in moderate-income tracts. Of the housing units located in low-income tracts, 21.3% are owner-occupied, 55.2% are rentals, and 23.6% are vacant. Of the housing units located in moderate-income tracts, 41.6% are owner-occupied, 45.8% are rentals, and 12.6% are vacant. Therefore, based on the high percentage of rental and vacant units, there may appear to be limited credit-related opportunities for North Side to make residential mortgage loans and provide various aspects of affordable housing in these tracts.

The 2015 census data shows the median age of housing stock was 57 years old, and 29.9% of assessment area’s 471,602 housing units are at least 65 years old (built before 1950). This indicates there are opportunities to make home improvement loans.

As indicated in the table below, median housing values increased between 2015 and 2018 and housing became more affordable across the assessment area. The primary reason housing affordability increased throughout the assessment area is attributed to the increase in median family income, which rose more than housing costs between 2015 and 2018. Conversely, median gross rents increased across the assessment area particularly in Hamilton County.

| Housing Costs Change | | | | | |
|-----------------------------|-----------------------------|------------------|-----------------------|----------------------------|-------------|
| Area | Median Housing Value | | Percent Change | Affordability Ratio | |
| | 2015 | 2018 | | 2015 | 2018 |
| Butler County | \$157,200 | \$165,900 | 5.2% | 36.6 | 38.2 |
| Hamilton County | \$142,000 | \$149,300 | 4.9% | 34.5 | 36.8 |
| Ohio | \$129,900 | \$140,000 | 7.2% | 38.1 | 39.0 |

Source: U.S. Census Bureau: American Community Survey (ACS)

| Rental Costs Change | | | |
|----------------------------|-----------------------------|--------------|-----------------------|
| Area | Median Housing Rents | | Percent Change |
| | 2015 | 2018 | |
| Butler County | \$817 | \$863 | 5.3% |
| Hamilton County | \$709 | \$779 | 9.0% |
| Ohio | \$730 | \$788 | 7.4% |

Source: U.S. Census Bureau: American Community Survey (ACS)

According to 2015 census data, 52.1% of renters in the assessment area have rent costs more than \$700 a month and nearly 47.1% of units for rent (162,692) have renters who are considered to be cost burdened or have rent costs greater than 30.0% of their monthly income. Increasing rental costs may make it more difficult for potential first-time homebuyers to save enough to make a sufficient down payment in the rising interest rate environment.

The following table highlights building permits² within the assessment area, Cincinnati MSA, state, and nation. Between 2016 and 2017, permits substantially decreased in Butler County and substantially increased in Hamilton County, and the number of building permits also increased in the MSA, Ohio, and nation. The total number of building permits decreased in the assessment area between 2017 and 2018, with Hamilton County experiencing the largest decline. The MSA also experienced a decline in building permits between 2017 and 2018, while Ohio and the nation experienced an increase. Overall, the decrease in permits could indicate a decreasing demand for home purchase loans during this evaluation period.

| Building Permits | | | | | |
|---------------------------------|------------------|------------------|-----------------------------------------------------|------------------|-----------------------------------------------------|
| Area | 2016 | 2017 | Percent Change between 2016 and 2017 | 2018 | Percent Change between 2017 and 2018 |
| Butler County | 1,140 | 817 | -28.3% | 791 | -3.2% |
| Hamilton County | 1,340 | 1,618 | 20.7% | 1,473 | -9.0% |
| Cincinnati, OH-KY-IN MSA | 5,867 | 6,465 | 10.2% | 6,076 | -6.0% |
| Ohio | 22,816 | 23,917 | 4.8% | 24,221 | 1.3% |
| United States | 1,206,642 | 1,281,977 | 6.2% | 1,328,827 | 3.7% |

Labor, Employment, and Economic Characteristics

The unemployment rates across the assessment area either remained stable or declined between 2016 and 2018. Butler and Hamilton counties had unemployment rates consistently lower than the unemployment rates in Ohio.

² www.realtytrac.com

Unemployment Rates
Assessment Area: Cincinnati, OH-KY-IN MSA

| Area | Years - Annualized | | |
|---------------------------------|--------------------|------------|------------|
| | 2016 | 2017 | 2018 |
| Butler County | 4.5 | 4.4 | 4.1 |
| Hamilton County | 4.4 | 4.4 | 4.1 |
| Cincinnati, OH-KY-IN MSA | 4.4 | 4.3 | 4.0 |
| Ohio | 5.0 | 5.0 | 4.6 |
| National | 4.9 | 4.4 | 3.9 |

Not Seasonally Adjusted

Data extracted on October 22, 2019

According to Dun & Bradstreet, the majority of businesses (88.1%) in the assessment area have revenues under \$1 million, and approximately 580,300 paid employees working in either the private sector or government. By percentage of employees, the largest job category in the assessment area is trade/transportation/utilities, followed by education/health services, professional/business services, leisure/hospitality, and manufacturing, respectively. The highest paying industries in Hamilton County are information, financial services, manufacturing, federal government, and professional/business services, respectively. The highest paying industries in Butler County are financial services, manufacturing, federal government, construction, and state government, respectively.³

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

North Side’s performance under the lending test is “Satisfactory.” The loan-to-deposit ratio is more-than-reasonable. The bank made a majority of its loans inside its assessment area. The borrower distribution is reasonable to individuals of different income levels and reasonable to businesses of different sizes. The geographic distribution of lending is reasonable primarily because of a high level of lending gaps.

Details of the bank’s HMDA and small business lending can be found in the tables in Appendix C.

³ Ohio Development Services Agency: https://www.development.ohio.gov/reports/reports_countytrends_map.htm

Loan-to-Deposit Ratio

This performance criterion evaluates North Side’s average loan-to-deposit (LTD) ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the assessment area, and in comparison to similarly situated FDIC-insured institutions. The two similarly situated institutions were selected based on asset size, product offerings, market share, and the area where they are located (operating within a similar assessment area). North Side’s LTD ranged from 88.7% in December 31, 2017, to 100.8% in June 30, 2019. The average LTD ratio was 94.7%, which is comparable to the peer group’s average LTD ratio of 95.4%. As a result, North Side’s LTD ratio is more than reasonable.

| The North Side Bank and Trust Company Loan-to-Deposit Ratios | | | | |
|--------------------------------------------------------------------------------------|-----------------|--------------|------------------------|-------------|
| AS OF DATE | NORTH SIDE B&TC | CENTERBANK | GUARDIAN SVG BK FSB | CUSTOM PEER |
| September 30, 2019 | 91.5 | 103.8 | 85.9 | 94.8 |
| June 30, 2019 | 100.8 | 112.6 | 89.1 | 100.9 |
| March 31, 2019 | 99.7 | 108.5 | 93.0 | 100.8 |
| December 31, 2018 | 97.0 | 95.4 | 95.8 | 95.6 |
| September 30, 2018 | 96.4 | 99.3 | 94.8 | 97.1 |
| June 30, 2018 | 92.5 | 100.4 | 95.9 | 98.2 |
| March 31, 2018 | 90.5 | 102.0 | 98.1 | 100.1 |
| December 31, 2017 | 88.7 | 103.7 | 95.0 | 99.3 |
| September 30, 2017 | 94.2 | 98.7 | 95.3 | 97.0 |
| June 30, 2017 | 95.3 | 101.8 | 91.9 | 96.8 |
| March 31, 2017 | 92.5 | 96.7 | 79.5 | 88.1 |
| December 31, 2016 | 95.1 | 100.1 | 81.5 | 90.8 |
| September 30, 2016 | 94.6 | 97.1 | 84.8 | 90.9 |
| June 30, 2016 | 98.1 | 99.8 | 82.1 | 91.0 |
| March 31, 2016 | 93.9 | 97.4 | 80.7 | 89.1 |
| Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation | 94.7 | 101.1 | 89.6 | 95.4 |

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the assessment area. A majority of North Side’s loans, by number and dollar, are originated inside the assessment area.

Lending Inside and Outside the Assessment Area

Exam: North Side 2020 (2018 Lending Data)

| Loan Type - Description | Inside | | | | Outside | | | | Total | | | |
|-----------------------------------|------------|-------------|----------------|-------------|------------|-------------|---------------|-------------|------------|--------------|----------------|--------------|
| | # | % | \$(000s) | % | # | % | \$(000s) | % | # | % | \$(000s) | % |
| MV - Motor Vehicle | 55 | 85.9 | 854 | 83.7 | 9 | 14.1 | 167 | 16.3 | 64 | 100.0 | 1,021 | 100.0 |
| OS - Other - Secured | 30 | 83.3 | 503 | 57.7 | 6 | 16.7 | 369 | 42.3 | 36 | 100.0 | 871 | 100.0 |
| OU - Other - Unsecured | 25 | 83.3 | 226 | 79.8 | 5 | 16.7 | 57 | 20.2 | 30 | 100.0 | 283 | 100.0 |
| Total Consumer related | 110 | 84.6 | 1,583 | 72.8 | 20 | 15.4 | 592 | 27.2 | 130 | 100.0 | 2,175 | 100.0 |
| CV - Home Purchase - Conventional | 50 | 70.4 | 8,954 | 69.2 | 21 | 29.6 | 3,980 | 30.8 | 71 | 100.0 | 12,934 | 100.0 |
| HI - Home Improvement | 67 | 98.5 | 1,882 | 98.9 | 1 | 1.5 | 20 | 1.1 | 68 | 100.0 | 1,902 | 100.0 |
| OC - Other Purpose Closed-End | 8 | 100.0 | 511 | 100.0 | 0 | 0.0 | 0 | 0.0 | 8 | 100.0 | 511 | 100.0 |
| RF - Refinancing | 39 | 86.7 | 6,111 | 85.7 | 6 | 13.3 | 1,021 | 14.3 | 45 | 100.0 | 7,132 | 100.0 |
| Total HMDA related | 164 | 85.4 | 17,458 | 77.7 | 28 | 14.6 | 5,021 | 22.3 | 192 | 100.0 | 22,479 | 100.0 |
| SB - Small Business | 404 | 83.3 | 109,383 | 73.4 | 81 | 16.7 | 39,632 | 26.6 | 485 | 100.0 | 149,015 | 100.0 |
| Total Small Bus. related | 404 | 83.3 | 109,383 | 73.4 | 81 | 16.7 | 39,632 | 26.6 | 485 | 100.0 | 149,015 | 100.0 |
| TOTAL LOANS | 678 | 84.0 | 128,424 | 73.9 | 129 | 16.0 | 45,245 | 26.1 | 807 | 100.0 | 173,669 | 100.0 |

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

Based on the total loan volume by number and dollar amounts available, HMDA (home purchase, home improvement, refinance) loans received the most weight, followed by consumer (motor vehicle, other secured, and other unsecured) loans, and small business loans.

North Side's lending has an overall reasonable penetration among individuals of different income levels and a reasonable penetration among businesses of different sizes. Borrower distribution is reasonable for home purchase, refinance, and home improvement, and small business lending. Borrower distribution is also reasonable for other secured and other unsecured lending. Borrower distribution is excellent for motor vehicle lending.

North Side offers a number of lending programs targeted toward low- and moderate-income borrowers and small businesses that are considered to be responsive to credit needs in its assessment area.

- North Side Home Ownership Program – a mortgage product with alternative underwriting qualifications eligible to low- and moderate- income borrowers to assist in the purchase or refinancing of owner-occupied single family residences located with the bank's assessment area. The loan program offers a reduced closing cost program where the borrower only pays \$500 plus recording fees. Other typical closing costs such as an appraisal, credit report, and flood determination are paid for by the bank. During this evaluation period, North Side originated 12 loans totaling \$874,844.

- North Side's Credit Builder Program – a product that assists individuals that have a poor credit history to rebuild their credit score. The loan must be for a minimum of \$1,000 with a term of 15 months or more and is secured by a certificate of deposit/time deposit account (minus loan fees). During the evaluation period, North Side originated 12 loans totaling \$11.1 million. A community contact stressed the need for banks to help low- and moderate-income individuals rebuild their credit scores in order to gain access to credit.
- Welcome Home loan program through Freddie Mac - alternative underwriting standards for individuals seeking to purchase a home. *Refer to Community Development Investments for more details.*
- Re-energize Ohio Program – a small business incentive program created by the State of Ohio Treasurer to encourage economic growth by helping businesses improve energy efficiency. During the evaluation period, North Side originated one loan under this program totaling \$150,000.
- Small Business Administration (SBA) 504 loans - a government-funded program that provides financial assistance to small businesses. During this evaluation period, North Side originated six SBA 504 loans totaling \$4.3 million.

Home Purchase Lending

North Side made 50 home purchase loans in 2018, totaling \$9.0 million; this included two (4.0%) loans, totaling \$154,000, to borrowers with unknown-income designations. North Side made six (12.0%) home purchase loans, totaling \$398,000, to low-income borrowers, which was well below the percentage of families at 24.8%. However, the percentage of loans was slightly above the aggregate of all lenders, which made 10.5% of home purchase loans to low-income borrowers. Since North Side's performance fell well below proxy, yet it was slightly above the aggregate of all lenders, the consequent borrower distribution of home purchase loans to low-income borrowers is reasonable.

North Side made five (10.0%) home purchase loans in 2018, totaling \$530,000, to moderate-income borrowers, which was below the percentage of families at 16.1%. Further, the percentage of loans was well below the aggregate of all lenders, which made 22.3% of home purchase loans to moderate-income borrowers. North Side's performance was below proxy and the aggregate of all lenders, but additional performance context is this ratio of performance to proxy is within a reasonable band of expected activity; therefore, the borrower distribution of home purchase loans to moderate-income borrowers is reasonable.

North Side made nine (18.0%) home purchase loans in 2018, totaling \$1.0 million to middle-income borrowers, which was slightly below proxy and aggregate of all lenders at 18.4% and 19.0%, respectively. North Side made 28 (56.0%) home purchase loans totaling \$6.8 million to upper-income borrowers, which was above proxy and aggregate of all lenders at 40.7% and 34.2%, respectively.

North Side made 31 home purchase loans in 2017, totaling \$4.7 million. North Side made two (6.5%) home purchase loans, totaling \$122,000, to low-income borrowers, which was well below the percentage of families at 24.8%. The percentage of loans was also below the aggregate of all lenders, which made 9.9% of home purchase loans to low-income borrowers. North Side's performance fell well below proxy and was below the aggregate of all lenders, and the low number of loans demonstrates the challenge of lending in this geography; therefore, borrower distribution of home purchase loans to low-income borrowers is reasonable.

North Side made four (12.9%) home purchase loans in 2017, totaling \$226,000, to moderate-income borrowers, which was slightly below the percentage of families at 16.1%. Further, the percentage of loans was below the aggregate of all lenders, which made 20.6% of home purchase loans to moderate-income borrowers. North Side's performance was slightly below proxy and below the aggregate of all lenders; therefore, the borrower distribution of home purchase loans to moderate-income borrowers is reasonable.

North Side made seven (22.6%) home purchase loans in 2017, totaling \$546,000, to middle-income borrowers, which was slightly above proxy and aggregate of all lenders at 18.4% and 18.9%. North Side made 18 (58.1%) home purchase loans, totaling \$3.8 million, to upper-income borrowers, which was above proxy at 40.7% and significantly above aggregate of all lenders at 32.9%.

North Side made 26 home purchase loans in 2016, totaling \$4.5 million. North Side made two (7.7%) home purchase loans, totaling \$89,000, to low-income borrowers, which was well below the percentage of families at 22.6%. However, the percentage of loans was just below the aggregate of all lenders, which made 8.8% of home purchase loans to low-income borrowers. North Side's performance fell well below proxy and was slightly below the aggregate of all lenders; therefore, borrower distribution of home purchase loans to low-income borrowers is reasonable.

North Side made five (19.2%) home purchase loans in 2016, totaling \$442,000, to moderate-income borrowers, which was slightly above the percentage of families at 16.8%. However, the percentage of loans was slightly below the aggregate of all lenders, which made 20.4% of home purchase loans to moderate-income borrowers. North Side's performance was slightly above proxy, and it was slightly below the aggregate of all lenders; therefore, borrower distribution of

home purchase loans to moderate-income borrowers is excellent as the performance compared to the proxy was given the most consideration.

North Side made five (19.2%) home purchase loans in 2016, totaling \$587,000, to middle-income borrowers, which was slightly below proxy and slightly above aggregate of all lenders at 19.9% and 18.1%. North Side made 12 (46.2%) home purchase loans, totaling \$3.0 million, to upper-income borrowers, which was slightly above proxy at 40.7% and above aggregate of all lenders at 35.2%.

North Side's performance varied compared to proxy and the aggregate of all lenders, and it originated loans through its home ownership program targeted to low- and moderate- income borrowers to assist in the purchase of owner-occupied single family residences. Therefore, borrower distribution of home purchase lending is reasonable.

Refinance Lending

North Side made 39 refinance loans in 2018, totaling \$6.1 million, including three (7.7%) loans, totaling \$273,000, to borrowers with unknown-income designations. North Side made seven (17.9%) refinance loans, totaling \$510,000, to low-income borrowers, which was below the percentage of families at 24.8%. However, the percentage of loans was well above the aggregate of all lenders, which made 10.8% of refinance loans to low-income borrowers. North Side's performance fell below proxy, yet it was well above the aggregate of all lenders. Therefore, considering the aggregate performance, borrower distribution of refinance loans to low-income borrowers is excellent.

North Side made five (12.8%) refinance loan in 2018, totaling \$382,000, to moderate-income borrowers, which was slightly below the percentage of families at 16.1%. However, the percentage of loans was well below the aggregate of all lenders, which made 18.4% of refinance loans to moderate-income borrowers. North Side's performance fell slightly below proxy but well below the aggregate of all lenders. Therefore, borrower distribution of refinance mortgage loans to moderate-income borrowers is reasonable with emphasis on the relative performance to proxy.

North Side made six (15.4%) refinance mortgage loans in 2018, totaling \$637,000, to middle-income borrowers, which was slightly below the proxy and aggregate of all lenders at 18.4% and 21.5%. North Side made 18 (46.2%) refinance mortgage loans, totaling \$4.3 million, to upper-income borrowers, which was slightly above proxy and aggregate of all lenders at 40.7% and 40.0%.

North Side made 25 refinance loans in 2017, totaling \$3.2 million. North Side made four (16.0%) refinance loans, totaling \$328,000, to low-income borrowers, which was below the percentage of families at 24.8%. The aggregate of all lenders made 8.4% of refinance loans to low-income borrowers. North Side's performance fell below proxy, yet it was significantly above the aggregate of all lenders. Therefore, considering the aggregate of all lenders' performance, borrower distribution of refinance loans to low-income borrowers is excellent.

North Side made one (4.0%) refinance loan in 2017, totaling \$41,000, to a moderate-income borrower, which was significantly below the percentage of families at 16.1%. Further, the percentage of loans was significantly below the aggregate of all lenders, which made 16.4% of refinance loans to moderate-income borrowers. North Side's performance fell significantly below proxy and the aggregate of all lenders. Therefore, considering North Side's performance, borrower distribution of refinance mortgage loans to moderate-income borrowers is very poor.

North Side made eight (32.0%) refinance mortgage loans in 2017, totaling \$817,000, to middle-income borrowers, which was well above the proxy and aggregate of all lenders at 18.4% and 21.0%. North Side made 12 (48.0%) refinance mortgage loans, totaling \$2.0 million, to upper-income borrowers, which was slightly above proxy and aggregate of all lenders at 40.7% and 38.0%.

North Side made 27 refinance loans in 2016, totaling \$3.1 million. North Side made five (18.5%) refinance loans, totaling \$368,000, to low-income borrowers, which was slightly below the percentage of families at 22.6%. However, the percentage of loans was significantly above the aggregate of all lenders, which made 5.6% of refinance loans to low-income borrowers. North Side's performance fell slightly below proxy, yet it was significantly above the aggregate of all lenders. Therefore, the borrower distribution of refinance loans to low-income borrowers is excellent.

North Side made six (22.2%) refinance loans in 2016, totaling \$432,000, to moderate-income borrowers, which was above the percentage of families at 16.8%. However, the percentage of loans was significantly above the aggregate of all lenders, which made 12.1% of refinance loans to moderate-income borrowers. North Side's performance was above proxy and significantly above the aggregate of all lenders. Therefore, considering the aggregate of all lenders' performance, borrower distribution of refinance loans to moderate-income borrowers is excellent.

North Side made three (11.1%) refinance loans in 2016, totaling \$271,000, to middle-income borrowers, which was below proxy and below the aggregate of all lenders at 19.9% and 17.0%. North Side made 13 (48.1%) refinance loans, totaling \$2.0 million, to upper-income borrowers, which was slightly above proxy at 40.7% and slightly above the aggregate of all lenders at 47.3%.

While North Side's performance varied compared to the percentage of families, it was generally below proxy and mostly exceeded the aggregate of all lenders. In addition, North Side originated loans through its home ownership program that targeted low- and moderate- income borrowers to assist in the refinance of owner-occupied single family residences. Therefore, borrower distribution of refinance lending is reasonable.

Home Improvement Lending

North Side made 67 home improvement loans in 2018, totaling \$1.8 million, including one (1.5%) loan totaling \$2,000 to a borrower with an unknown-income designation. North Side made seven (10.4%) home improvement loans, totaling \$169,000, to low-income borrowers, which was well below the percentage of families at 24.8%. However, the percentage of loans was only slightly below the aggregate of all lenders, which made 11.5% of home improvement loans to low-income borrowers. North Side's performance fell well below proxy, but it was slightly below the aggregate of all lenders. Therefore, considering the aggregate of all lenders' performance, borrower distribution of home improvement loans to low-income borrowers is reasonable.

North Side made 13 (19.4%) home improvement loans in 2018, totaling \$159,000, to moderate-income borrowers, which was slightly above the percentage of families at 16.1%. The percentage of loans was also slightly above the aggregate of all lenders, which made 18.6% of home improvement loans to moderate-income borrowers. North Side's performance was slightly above both proxy and the aggregate of all lenders; therefore, considering the performance, borrower distribution of home improvement loans to moderate-income borrowers is excellent.

North Side made 16 (23.9%) home improvement loans in 2018, totaling \$487,000, to middle-income borrowers, which was above the proxy and aggregate of all lenders at 18.4% and 19.0%. North Side made 30 (44.8%) home improvement loans, totaling \$1.0 million, to upper-income borrowers, which was slightly above proxy and slightly below aggregate of all lenders at 40.7% and 46.5%.

North Side made 39 home improvement loans in 2017, totaling \$964,000. North Side made two (5.1%) home improvement loans, totaling \$8,000, to low-income borrowers, which was significantly below the percentage of families at 24.8%. The percentage of loans was also well below the aggregate of all lenders, which made 13.9% of home improvement loans to low-income borrowers. North Side's performance fell significantly below proxy and the aggregate. Therefore, considering the aggregate of all lenders' performance, borrower distribution of home improvement loans to low-income borrowers is poor.

North Side made three (7.7%) home improvement loans in 2017, totaling \$59,000, to moderate-income borrowers, which was well below the percentage of families at 16.1%. The percentage of loans was also well below the aggregate of all lenders, which made 19.2% of home improvement loans to moderate-income borrowers. North Side's performance fell well below proxy and the aggregate. Therefore, considering North Side's performance, borrower distribution of home improvement loans to moderate-income borrowers is poor.

North Side made nine (23.1%) home improvement loans in 2017, totaling \$137,000, to middle-income borrowers, which was above the proxy and slightly above the aggregate of all lenders at 18.4% and 22.8%. North Side made 25 (64.1%) home improvement loans, totaling \$760,000, to upper-income borrowers, which was well above proxy and aggregate of all lenders at 40.7% and 40.2%.

North Side made 46 home improvement loans in 2016, totaling \$1.0 million. North Side made 12 (26.5%) home improvement loans, totaling \$163,000, to low-income borrowers, which was slightly above the percentage of families at 22.6%. However, the percentage of loans was significantly above the aggregate of all lenders, which made just 7.4% of home improvement loans to low-income borrowers. North Side's performance was slightly above proxy and significantly above the aggregate of all lenders. Therefore, considering the aggregate of all lenders' performance, borrower distribution of home improvement loans to low-income borrowers is excellent.

North Side made four (8.7%) home improvement loans in 2016, totaling \$56,000, to moderate-income borrowers, which was below the percentage of families at 16.8%. The percentage of loans was also below the aggregate of all lenders, which made 16.0% of home improvement loans to moderate-income borrowers. North Side's performance was below proxy and the aggregate of all lenders. Therefore, considering the aggregate of all lenders' performance, borrower distribution of home improvement loans to moderate-income borrowers is reasonable.

North Side made six (13.0%) home improvement loans in 2016, totaling \$152,000, to middle-income borrowers, which was slightly below proxy and aggregate of all lenders at 19.9% and 20.5%. North Side made 24 (52.2%) home improvement loans, totaling \$677,000, to upper-income borrowers, which was above proxy at 40.7% and slightly above aggregate of all lenders at 50.4%.

North Side's performance varied compared to the percentage of families and aggregate of all lenders; therefore, the combined borrower distribution of home improvement lending is reasonable.

Motor Vehicle Lending

North Side made 55 motor vehicle loans, totaling \$854,000, including nine (16.4%) loans, totaling \$216,000, to borrowers with unknown-income designations. North Side made 12 (21.8%) motor vehicle loans, totaling \$115,000, to low-income borrowers, which was slightly below the percentage of households at 28.3%. Compared to proxy, the borrower distribution of motor vehicle loans to low-income borrowers is reasonable.

North Side made 12 (21.8%) motor vehicle loans, totaling \$150,000, to moderate-income borrowers, which is above the percentage of households at 15.7%. Compared to proxy, borrower distribution of motor vehicle loans to moderate-income borrowers is excellent.

North Side made nine (16.4%) motor vehicle loans, totaling \$92,000, to middle-income borrowers, which is slightly above proxy at 16.1%. North Side made 13 (23.6%) motor vehicle loans, totaling \$235,000, to upper-income borrowers, which was below the proxy at 39.9%.

While North Side's performance varied compared to proxy, a community contact stressed the need for reliable transportation, particularly for lower-income individuals; therefore, borrower distribution of motor vehicle lending is reasonable.

Other Secured Lending

North Side made 30 other secured loans, totaling \$503,000, including 11 (36.7%) loans, totaling \$249,000, to borrowers with unknown-income designations. North Side made six (20.0%) other secured loans, totaling \$10,000, to low-income borrowers, which was below the percentage of households at 28.3%. Compared to proxy, borrower distribution of other secured loans to low-income borrowers is reasonable.

North Side made five (16.7%) other secured loans, totaling \$6,000, to moderate-income borrowers, which is slightly above the percentage of households at 15.7%. Compared to proxy, borrower distribution of other secured loans to moderate-income borrowers is excellent.

North Side made three (10.0%) other secured loans, totaling \$25,000, to middle-income borrowers, which is below proxy at 16.1%. North Side made five (16.7%) other secured loans, totaling \$213,000, to upper-income borrowers, which was well below the proxy at 39.9%.

North Side performance varied compared to proxy; therefore, the combined performance for borrower distribution of other secured lending is reasonable.

Other Unsecured Lending

North Side made 25 other unsecured loans, totaling \$226,000, including five (20.0%) loans, totaling \$59,000, to borrowers with unknown-income designations. North Side made nine (36.0%) other unsecured loans, totaling \$44,000, to low-income borrowers, which was above the percentage of households at 28.3%. Compared to proxy, borrower distribution of other unsecured loans to low-income borrowers is excellent.

North Side made one (4.0%) other unsecured loan, totaling \$6,000, to a moderate-income borrower, which is well below the percentage of households at 15.7%. Compared to proxy, borrower distribution of other unsecured loans to moderate-income borrowers is poor.

North Side made seven (28.0%) other unsecured loans, totaling \$41,000, to middle-income borrowers, which is well above proxy at 16.1%. North Side made three (12.0%) other unsecured loans, totaling \$75,000, to upper-income borrowers, which was well below the proxy at 39.9%.

North Side's performance varied compared to proxy; therefore, the combined performance for borrower distribution of other unsecured lending is reasonable.

Small Business Lending

North Side made 404 small business loans, totaling \$109.4 million, in 2018, of which 33 (8.2%) were made to small businesses. Although lending to small business is substantially below the percentage of small businesses in the assessment area at 88.1%, the high percentage of loans with unknown revenue (81.9%) was taken into account when evaluating the performance. The large amount of small business loans with unknown revenues is due to two factors: 1) revenues were not collected or used for 77 of the small business loans; 2) revenues were not taken for the 254 business credit card loans because these loans were added after the data sampling process (i.e., the 33 small business loans made to small businesses did not include credit cards). Therefore, the number of loans to small businesses was compared to the 150 total of small business loans that were not credit cards. *See the table below for the composition of the small business loans by revenue and loan type.* North Side made 22.0% of non-credit card business loans to small businesses with revenues of \$1 million or less, which was still substantially below the percentage of small businesses in the assessment area; therefore, the borrower distribution of small business loans is poor.

| Revenue | Number of Loans | % | Total Loan Amount (\$000) | % |
|-----------------------------------------------------|-----------------|--------------|---------------------------|--------------|
| <i>Small Business Loans Other than Credit Cards</i> | | | | |
| \$1 Million or Less | 33 | 8.2 | 20,315 | 18.6 |
| Over \$1 Million | 40 | 9.9 | 23,203 | 21.2 |
| Revenue Not Available | 77 | 19.1 | 64,185 | 58.7 |
| <i>Total</i> | <i>150</i> | <i>37.1</i> | <i>107,703</i> | <i>98.5</i> |
| <i>Credit Cards</i> | | | | |
| Revenue Not Available | 254 | 62.9 | 1,680 | 1.5 |
| All Small Business Loans | 404 | 100.0 | 109,383 | 100.0 |

However, during the evaluation period, North Side made a good percentage (77.2%) of its small dollar loans in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts that tends to represent amounts typically requested by small businesses. In addition, a community contact indicated there is a need to provide small business owners with small dollar working capital loans, which are necessary to retain or expand their businesses. Lastly, North Side originated several SBA 504 loans, demonstrating lending support for small businesses.

Geographic Distribution of Loans

In the geographic distribution analysis, small business loans received the most weight, followed by HMDA (home purchase, home improvement, refinance) loans and consumer (motor vehicle, other secured, and other unsecured) loans.

North Side’s distribution of loans among different geographic income levels is excellent for small business, home purchase, home improvement, and other secured. In contrast, the distribution of loans is reasonable for refinance, motor vehicle, and other unsecured. North Side also had substantial gaps in originating loans in all census tracts in its assessment area during the evaluation period, but the overall performance for geographic distribution was still reasonable. The following gaps in lending were noted in the assessment area:

| Tract Income Level | Number of Tracts | Number of Tracts with Loans | % of Tracts with Loans |
|--------------------|------------------|-----------------------------|------------------------|
| 2016 | | | |
| Low | 43 | 5 | 11.6% |
| Moderate | 68 | 16 | 23.5% |
| Middle | 87 | 24 | 27.6% |
| Upper | 70 | 26 | 37.1% |
| Unknown | 0 | 0 | 0.0% |
| Total | 268 | 71 | 26.5% |
| 2017 | | | |
| Low | 47 | 3 | 6.4% |
| Moderate | 69 | 14 | 20.3% |
| Middle | 76 | 21 | 27.6% |
| Upper | 73 | 26 | 35.6% |
| Unknown | 3 | 0 | 0.0% |
| Total | 268 | 64 | 23.9% |
| 2018 | | | |
| Low | 47 | 20 | 42.6% |
| Moderate | 69 | 42 | 60.9% |
| Middle | 76 | 50 | 65.8% |
| Upper | 73 | 48 | 65.8% |
| Unknown | 3 | 0 | 0.0% |
| Total | 268 | 160 | 59.7% |

The higher number of gaps in 2016 and 2017 were primarily because the only lending evaluated for this time period were HMDA-reportable loans. North Side is primarily a commercial lender; 87.8% of loans made during the evaluation period were commercial loans. The number of gaps declined significantly in 2018 when commercial loans were included; however, there remains a significant number of gaps in low-income tracts and a moderate amount of gaps in moderate-income tracts. However, low-income tracts have owner-occupancy rates of less than 25.0% and rental/vacancy rates over 75.0%. While moderate-income tracts have much higher owner-occupancy rates, rental/vacancy rates are still over 50.0% in these tracts. These factors likely impacted North Side's ability to lend in these areas.

Small Business Lending

North Side made 404 small business loans, totaling \$109.4 million. North Side made 136 (33.7%) loans, totaling \$15.9 million, in low-income tracts, which was significantly above the percentage of businesses in these tracts at 9.3%. Given that North Side's performance was significantly above proxy, the geographic distribution of small business loans in low-income tracts is excellent.

North Side made 96 (23.8%) small business loans, totaling \$36.8 million, in moderate-income tracts, which was slightly above the percentage of businesses in these tracts at 21.7%. Given that North Side's performance was slightly above proxy, the geographic distribution of small business loans in moderate-income tracts is excellent.

North Side made 45 (11.1%) small business loans, totaling \$17.3 million, in middle-income tracts, which was well below the percentage of businesses in these tracts at 28.1%. North Side made 127 (31.4%) small business loans, totaling \$39.2 million, in upper-income tracts, which was slightly below proxy in these tracts at 39.8%.

North Side's performance exceeded proxy in this area; therefore, geographic distribution of small business lending is excellent.

Home Purchase Lending

North Side made 50 home purchase loans, totaling \$9.0 million, in 2018. North Side made five (10.0%) loans in low-income tracts, totaling \$353,000, which was well above the percentage of owner-occupied units in these tracts of 5.8%. The percentage of loans was also significantly above the aggregate of all lenders, which made 4.3% of loans in low-income tracts. Given that North Side's performance was well above proxy and significantly above the aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is excellent.

North Side made eight loans (16.0%) in moderate-income tracts, totaling \$811,000, which was slightly below the percentage of owner-occupied units in these tracts at 19.3%. The percentage of loans was also slightly below the aggregate of all lenders, which made 19.4% of loans in moderate-income tracts. Given that North Side's performance was slightly below proxy and the aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is reasonable.

North Side made 19 (38.0%) home purchase loans, totaling \$1.8 million, in middle-income tracts, which was slightly above the percentage of owner-occupied units in these tracts at 34.8%. The aggregate of all lenders made 37.0% of loans in middle-income tracts. North Side made 18 (36.0%)

home purchase loans, totaling \$5.9 million, in upper-income tracts, which was slightly below proxy in these tracts at 40.1%. The aggregate of all lenders made 39.2% of loans in upper-income tracts.

North Side made 31 home purchase loans, totaling \$4.7 million, in 2017. North Side made no loans in low-income tracts, while the percentage of owner-occupied units in these tracts is 5.8%. The aggregate of all lenders made 4.4% of loans in low-income tracts. Given that North Side's performance was significantly below proxy and aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is very poor.

North Side made four home purchase loans (12.9%) in moderate-income tracts, totaling \$321,000, which was below the percentage of owner-occupied units in these tracts at 19.3%. The percentage of loans was also below the aggregate of all lenders, which made 19.8% of loans in moderate-income tracts. While North Side's performance was below proxy and aggregate of all lenders, the low number of loans overall in this area impacts the analysis. Therefore, the geographic distribution of home purchase loans in moderate-income tracts is reasonable.

North Side made 14 (45.2%) home purchase loans, totaling \$1.7 million, in middle-income tracts, which was above the percentage of owner-occupied units in these tracts at 34.8%. The aggregate of all lenders made 36.5% of loans in middle-income tracts. North Side made 13 (41.9%) home purchase loans, totaling \$2.6 million, in upper-income tracts, which was slightly above proxy in these tracts at 40.1%. The aggregate of all lenders made 39.0% of loans in upper-income tracts.

North Side made 26 home purchase loans, totaling \$4.5 million, in 2016. North Side made one (3.8%) loan in low-income tracts, totaling \$46,000, which was slightly below the percentage of owner-occupied units in these tracts at 4.2%. However, the percentage of loans was slightly above the aggregate of all lenders, which made 3.2% of loans in low-income tracts. Given that North Side's performance was slightly below proxy and slightly above the aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is excellent.

North Side made six home purchase loans (23.1%) in moderate-income tracts, totaling \$643,000, which was above the percentage of owner-occupied units in these tracts of 18.4%. The percentage of loans was also above the aggregate of all lenders, which made 17.0% of loans in moderate-income tracts. Given that North Side's performance was above proxy and aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is excellent.

North Side made seven (26.9%) home purchase loans, totaling \$1.3 million, in middle-income tracts, which was below the percentage of owner-occupied units in these tracts at 38.1%. The aggregate of all lenders made 39.3% of loans in middle-income tracts. North Side made 12 (46.2%)

home purchase loans, totaling \$2.5 million, in upper-income tracts, which was slightly above proxy in these tracts at 39.3%. The aggregate of all lenders made 40.5% of loans in upper-income tracts.

North Side's performance sometimes exceeded proxy and aggregate of all lenders in a highly competitive landscape; therefore, geographic distribution of home purchase lending is excellent.

Refinance Lending

North Side made 39 refinance loans, totaling \$6.1 million, in 2018. North Side made no loans in low-income tracts, while the percentage of owner-occupied units in these tracts is 5.8%. The aggregate of all lenders made 4.2% of loans in low-income tracts. Given that North Side's performance was significantly below proxy and aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is very poor.

North Side made 10 refinance loans (25.6%) in moderate-income tracts, totaling \$935,000, which was above the percentage of owner-occupied units in these tracts at 19.3%. The percentage of loans was also well above the aggregate of all lenders, which made 15.8% of loans in moderate-income tracts. Given that North Side's performance was slightly above proxy and above the aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is excellent.

North Side made 13 (33.3%) refinance loans, totaling \$1.1 million, in middle-income tracts, which was slightly above the percentage of owner-occupied units in these tracts at 34.8%. The aggregate of all lenders made 34.1% of loans in middle-income tracts. North Side made 16 (41.0%) refinance loans, totaling \$3.9 million, in upper-income tracts, which was slightly below proxy in these tracts at 40.1%. The aggregate of all lenders made 45.8% of loans in upper-income tracts.

North Side made 25 refinance loans, totaling \$3.2 million, in 2017. North Side made no loans in low-income tracts, while the percentage of owner-occupied units in these tracts is 5.8%. The aggregate of all lenders made 4.5% of loans in low-income tracts. Given that North Side's performance was significantly below proxy and aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is very poor.

North Side made five refinance loans (20.0%) in moderate-income tracts, totaling \$593,000, which was slightly above the percentage of owner-occupied units in these tracts at 19.3%. The percentage of loans was also slightly above the aggregate of all lenders, which made 16.3% of loans in moderate-income tracts. Given that North Side's performance was slightly above the proxy and aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is excellent.

North Side made eight refinance loans (32.0%) in middle-income tracts, totaling \$725,000, which was slightly below the percentage of owner-occupied units in these tracts at 34.8%. The aggregate of all lenders made 34.7% of loans in middle-income tracts. North Side made 13 (48.0%) refinance loans, totaling \$1.9 million, in upper-income tracts, which was slightly above proxy in these tracts at 40.1%. The aggregate of all lenders made 44.3% of loans in upper-income tracts.

North Side made 27 refinance loans, totaling \$3.1 million, in 2016. North Side made one loan (3.7%) in a low-income tract, totaling \$98,000, which was slightly below the percentage of owner-occupied units in these tracts at 4.2%. However, the percentage of loans was well above the aggregate of all lenders, which made 2.4% of loans in low-income tracts. Given that North Side's performance was slightly below proxy and well above the aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is excellent.

North Side made five refinance loans (18.5%) in moderate-income tracts, totaling \$379,000, which was slightly above the percentage of owner-occupied units in these tracts at 18.4%. However, the percentage of loans was well above the aggregate of all lenders, which made 12.3% of loans in moderate-income tracts. Given that North Side's performance was slightly above proxy and notably above the aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is excellent.

North Side made ten (37.0%) refinance loans, totaling \$1.2 million, in middle-income tracts, which was slightly below the percentage of owner-occupied units in these tracts at 38.1%. The aggregate of all lenders made 33.4% of loans in middle-income tracts. North Side made 11 (40.7%) refinance loans, totaling \$1.3 million, in upper-income tracts, which was slightly above proxy in these tracts at 39.3%. The aggregate of all lenders made 51.9% of loans in upper-income tracts.

North Side's performance generally exceeded the proxy and aggregate of all lenders; therefore, geographic distribution of refinance lending is excellent.

Home Improvement Lending

North Side made 67 home improvement loans, totaling \$1.8 million, in 2018. North Side made ten (14.9%) home improvement loans in low-income tracts, totaling \$206,000, which was significantly above the percentage of owner-occupied units in these tracts at 5.8%. Further, the percentage of loans was significantly above the aggregate of all lenders, which made 7.1% of loans in low-income tracts. Given that North Side's performance was significantly above proxy and aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is excellent.

North Side made 14 home improvement loans (20.9%) in moderate-income tracts, totaling \$368,000, which was slightly above the percentage of owner-occupied units in these tracts at 19.3%. The percentage of loans was also above the aggregate of all lenders, which made 17.8% of loans in moderate-income tracts. Given that North Side's performance was slightly above proxy and notably above the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

North Side made 26 (38.8%) home improvement loans, totaling \$863,000, in middle-income tracts, which was slightly above the percentage of owner-occupied units in these tracts at 34.8%. The aggregate of all lenders made 30.4% of loans in middle-income tracts. North Side made 17 (25.4%) home improvement loans, totaling \$444,000, in upper-income tracts, which was below proxy in these tracts at 40.1%. The aggregate of all lenders made 44.6% of loans in upper-income tracts.

North Side made 39 home improvement loans, totaling \$964,000, in 2017. North Side made three loans (7.7%) in low-income tracts, which was above the percentage of owner-occupied units in these tracts at 5.8%. However, the percentage of loans was slightly below the aggregate of all lenders, which made 10.0% of loans in low-income tracts. Given that North Side's performance was slightly above proxy and slightly below aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is reasonable.

North Side made eight home improvement loans (11.9%) in moderate-income tracts, totaling \$179,000, which was slightly above the percentage of owner-occupied units in these tracts at 19.3%. However, the percentage of loans was slightly below the aggregate of all lenders, which made 24.9% of loans in moderate-income tracts. Given that North Side's performance was slightly above the proxy and slightly below the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is reasonable.

North Side made 17 home improvement loans (43.6%) in middle-income tracts, totaling \$484,000, while the percentage of owner-occupied units in these tracts is 34.8%. The aggregate of all lenders made 32.2% of loans in middle-income tracts. North Side made 11 (28.2%) home improvement loans, totaling \$255,000, in upper-income tracts, which was below proxy in these tracts at 40.1%. The aggregate of all lenders made 32.8% of loans in upper-income tracts.

North Side made 46 home improvement loans, totaling \$1.0 million, in 2016. North Side made three loans (6.5%) in low-income tracts, totaling \$52,000, which was well above the percentage of owner-occupied units in these tracts at 4.2%. Further, the percentage of loans was significantly above the aggregate of all lenders, which made 2.6% of loans in low-income tracts. Given that

North Side's performance was well above proxy and significantly above aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is excellent.

North Side made 12 home improvement loans (26.1%) in moderate-income tracts, totaling \$258,000, which was above the percentage of owner-occupied units in these tracts at 18.4%. Further, the percentage of loans was well above the aggregate of all lenders, which made 15.3% of loans in moderate-income tracts. Given that North Side's performance was above proxy and well above the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

North Side made 16 (34.8%) home improvement loans, totaling \$349,000, in middle-income tracts, which was slightly below the percentage of owner-occupied units in these tracts at 38.1%. The aggregate of all lenders made 33.4% of loans in middle-income tracts. North Side made 15 (32.6%) home improvement loans, totaling \$389,000, in upper-income tracts, which was slightly below proxy in these tracts at 39.3%. The aggregate of all lenders made 48.7% of loans in upper-income tracts.

North Side's performance generally exceeded proxy and aggregate of all lenders. In addition, a community contact indicated a need to fund rehabilitation of dilapidated housing stock (the majority of which is located in low- and moderate-income tracts), which can be cost-prohibitive and a major cost of revitalizing an area. North Side had excellent levels of home improvement loans, particularly in low- and moderate-income geographies. Therefore, geographic distribution of home improvement lending is excellent.

Motor Vehicle Lending

North Side made 55 motor vehicle loans, totaling \$854,000, in 2018. North Side made nine (16.4%) loans in tracts of unknown income designations. North Side made 12 (21.8%) loans, totaling \$115,000, in low-income tracts, which was slightly below the percentage of households in these tracts at 28.3%. Compared to proxy, geographic distribution of motor vehicle loans in low-income tracts is reasonable.

North Side made 12 (21.8%) motor vehicle loans, totaling \$150,000, in moderate-income tracts, which was significantly above the percentage of households in these tracts at 15.7%. Compared to proxy, geographic distribution of motor vehicle loans in moderate-income tracts is excellent.

North Side made nine (16.4%) motor vehicle loans, totaling \$92,000, in middle-income tracts, which was slightly above the percentage of households in these tracts at 16.1%. North Side made 13 (23.6%) motor vehicle loans in upper-income tracts, while the proxy in these tracts is 39.9%.

While North Side's performance for motor vehicle lending varied compared to proxy, lending performance was particularly strong in moderate-income tracts; therefore, geographic distribution of motor vehicle lending is excellent.

Other Secured Lending

North Side made 30 other secured loans, totaling \$503,000, in 2018. North Side made 11 (36.7%) loans in income tracts of unknown income designations. North Side made six (20.0%) loans, totaling \$10,000, in low-income tracts, which was below the percentage of households in these tracts at 28.3%. Compared to proxy, geographic distribution of other secured loans in low-income tracts is reasonable.

North Side made five (16.7%) other secured loans, totaling \$6,000, in moderate-income tracts, which was slightly above the percentage of households in these tracts at 15.7%. Compared to proxy, geographic distribution of other secured loans in moderate-income tracts is excellent.

North Side made three (10.0%) other secured loans, totaling \$25,000, in middle-income tracts, which was below the percentage of households in these tracts at 16.1%. North Side made five (16.7%) other secured loans in upper-income tracts, while the proxy in these tracts is 39.9%.

North Side's performance for other secured lending, was generally below but close to proxy; therefore, geographic distribution of other secured lending is reasonable.

Other Unsecured Lending

North Side made 25 other unsecured loans, totaling \$226,000, in 2018. North Side made five (20.0%) loans in income tracts of unknown income designations. North Side made nine (36.0%) loans, totaling \$44,000, in low-income tracts, which was slightly above the percentage of households in these tracts at 28.3%. Compared to proxy, geographic distribution of other unsecured loans in low-income tracts is excellent.

North Side made one (4.0%) other unsecured loan, totaling \$6,000, in moderate-income tracts, which was well below the percentage of households in these tracts at 15.7%. Compared to proxy, geographic distribution of other unsecured loans in moderate-income tracts is poor.

North Side made seven (28.0%) other unsecured loans, totaling \$41,000, in middle-income tracts, which was well above the percentage of households in these tracts at 16.1%. North Side made

three (12.0%) other unsecured loans in upper-income tracts, while the proxy in these tracts is 39.9%.

North Side's performance varied compared to proxy, and the low number of loans also contributed to each loan having a high percentage impact. Given the totality of the information, geographic distribution of other unsecured lending is reasonable.

Response to Complaints

No CRA-related complaints were received during this evaluation period.

Community Development Test

North Side's performance under the community development test is "Outstanding."

North Side's community development performance demonstrates an excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering North Side's capacity and the need and availability of such opportunities in the assessment area. In particular, North Side's affordable housing community development loans and variety of donations exhibits an excellent responsiveness to the needs in the community. The community development loans and donations provided support to the local economy for affordable housing, economic development, and community services, and it results in improved outcomes for low- and moderate-income individuals and families. Community contacts stressed the need for affordable housing, credit and homeownership counseling, and funding to support community development revitalization projects that rehabilitate dilapidated housing stock and commercial buildings.

Community Development Lending

North Side originated 77 community development loans, totaling approximately \$3.7 million, during the evaluation period. Details are shown in the table below.

| Purpose | # | \$ |
|-------------------------|-----------|--------------------|
| Affordable Housing | 71 | \$1,104,684 |
| Revitalize or Stabilize | 5 | \$2,397,500 |
| Community Service | 1 | \$240,000 |
| Total | 77 | \$3,742,184 |

The community development loans supported the following purposes:

- Majority of loans were participation loans with Habitat for Humanity supporting 71 single-family units of affordable housing
- Two participation loans with the Cincinnati Development Fund and City of Cincinnati Build Cincinnati Fund to help improve blighted and economic conditions within LMI neighborhoods
- Five loans to construct and revitalize housing stock for resale in low-income neighborhoods

These loans demonstrate responsiveness to needs in the community. Community contacts stressed the need for affordable housing, which these loans support, along with the need for funding for community development revitalization projects that rehabilitate dilapidated housing stock and commercial buildings.

Finally, consideration was given to 27 qualified community development loans, totaling \$435,604, that benefited five counties within Ohio, but they were outside North Side's delineated assessment area. These loans were participation loans with Habitat for Humanity supporting 27 single-family units of affordable housing.

Community Development Investments

North Side originated eight qualified community development investments, totaling approximately \$439,584, during the evaluation period.

| Purpose | # | \$ |
|--------------------|----------|------------------|
| Affordable Housing | 7 | \$221,876 |
| Community Service | 1 | \$217,708 |
| Total | 8 | \$439,584 |

The community service investment provided needed funds in the form of a municipal school bond supporting a school with a majority of the students eligible for the free- and reduced-lunch program. A single affordable housing investment also provided investment capital to a non-profit organization that constructs affordable housing. The remaining six affordable housing investments were in the form of Welcome Home Fund grants, totaling \$30,000. North Side worked with the Federal Home Loan Bank of Cincinnati to qualify six low- and moderate-income homebuyers for \$5,000 of assistance to fund either down payments or closing costs for new homes during this evaluation period. These investments demonstrate responsiveness to needs in the community. A community contact stressed the substantial need for affordable housing, which a majority of the qualified investments supports.

North Side also made 37 donations, totaling \$22,599, to various organizations during this evaluation period, as shown below:

| Purpose | # | \$ |
|-------------------------|-----------|-----------------|
| Affordable Housing | 3 | \$1,812 |
| Community Service | 32 | \$20,187 |
| Revitalize or Stabilize | 1 | \$250 |
| Economic Development | 1 | \$350 |
| Total | 37 | \$22,599 |

Donations primarily supported non-profits that provide a multitude of services to low- and moderate-income individuals and families, including, but not limited to, affordable housing, financial literacy, wrap-around services to low-income individuals and families, and training and support for entrepreneurs and small businesses. The donations that supported affordable housing, credit counseling, and support for small businesses, were all needs expressed by community contacts. North Side also participates in the Student Enterprise Program (STEP), which provides financial literacy training to low-income students and integrates financial literacy education into the curriculum. In addition, donations are also provided to a non-profit organization dedicated to meeting the critical needs of children and adults by identifying, developing, implementing and funding on-going community programs.

Community Development Services

During the evaluation period, 22 employees provided assistance to 15 different local organizations that provide a multitude of services throughout the assessment area and approximately 832 hours of qualified community development services; this represents 0.42 ANP.⁴

| Purpose | Hours |
|----------------------|--------------|
| Affordable Housing | 116 |
| Community Service | 653 |
| Economic Development | 63 |
| Total | 832 |

Employees provided financial expertise through leadership positions in several community organizations that provide services to low- and moderate-income individuals and families. These

⁴ Annualized Persons (ANP): Number CD qualified service hours divided by 50 working weeks in a year (2,000 hours)

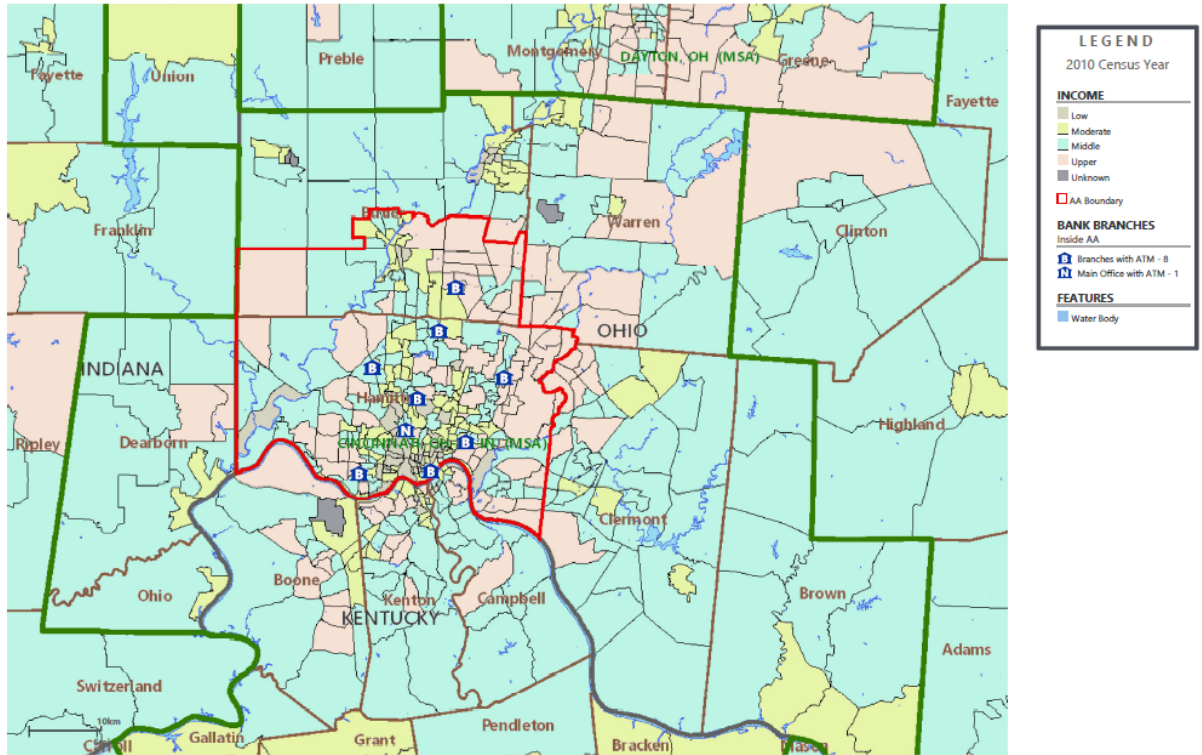
organization also promote affordable housing and community and economic development. Community development services include technical expertise, financial literacy education, and serving on boards and committees.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

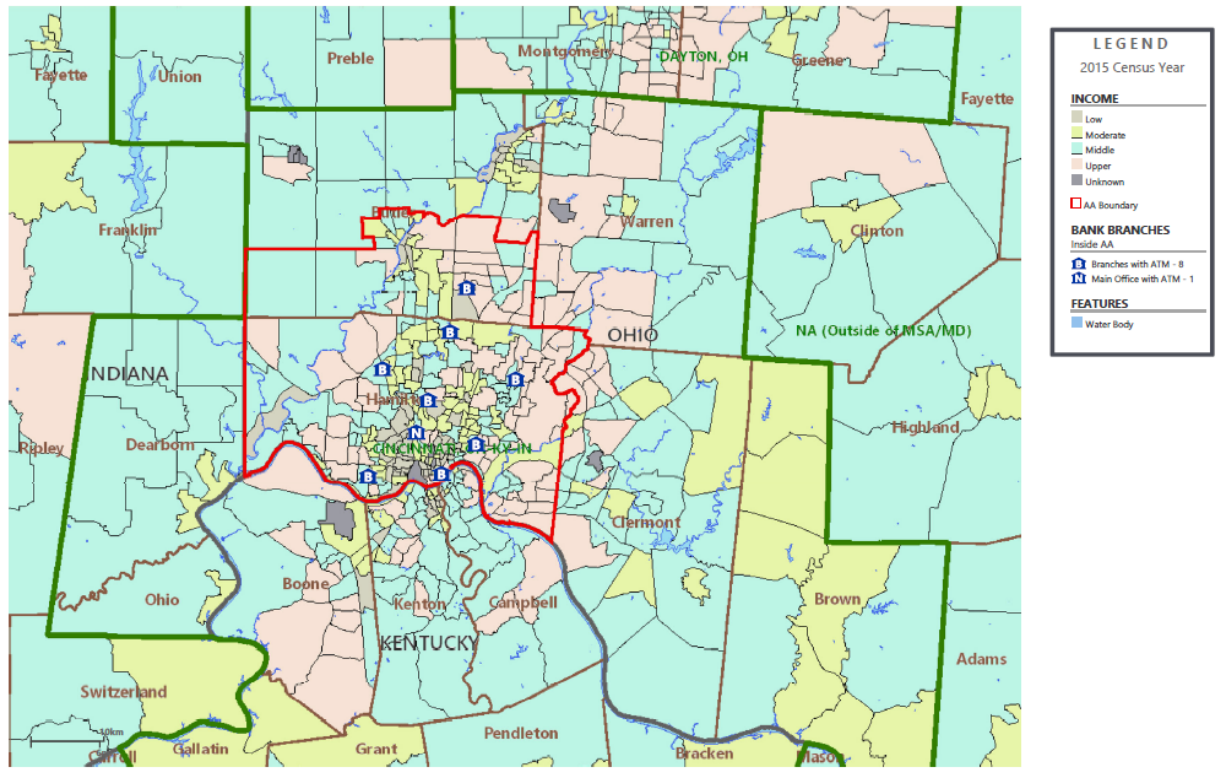
An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – MAP OF THE ASSESSMENT AREA

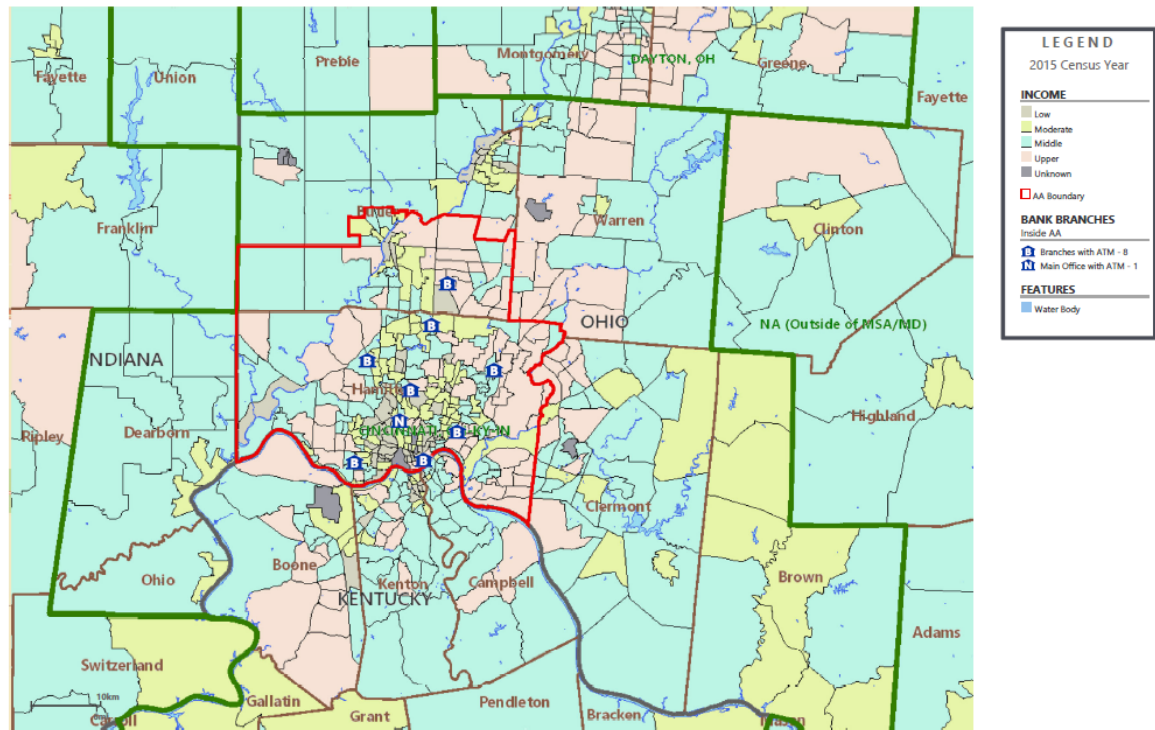
Assessment Area: 2016 Cincinnati, OH-KY-IN MSA



Assessment Area: 2017 Cincinnati, OH-KY-IN MSA



Assessment Area: 2018 Cincinnati, OH-KY-IN MSA



APPENDIX B – DEMOGRAPHICS INFORMATION

Combined Demographics Report

Assessment Area(s): North Side 2016

| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
|------------------------------|---------------------------------|------------------------------------|--------------------------|------------------|----------------------------------------------------|----------------------|---------------------------|--------------|
| | # | % | # | % | # | % | # | % |
| Low-income | 43 | 16.0 | 20,886 | 8.1 | 8,696 | 41.6 | 58,181 | 22.6 |
| Moderate-income | 68 | 25.4 | 53,798 | 20.9 | 9,034 | 16.8 | 43,260 | 16.8 |
| Middle-income | 87 | 32.5 | 92,466 | 35.9 | 6,451 | 7.0 | 51,232 | 19.9 |
| Upper-income | 70 | 26.1 | 90,166 | 35.0 | 2,298 | 2.5 | 104,643 | 40.7 |
| Unknown-income | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 268 | 100.0 | 257,316 | 100.0 | 26,479 | 10.3 | 257,316 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | Rental | | Vacant | | |
| | | # | % | % | # | % | # | % |
| Low-income | 57,643 | 10,976 | 4.2 | 19.0 | 29,636 | 51.4 | 17,031 | 29.5 |
| Moderate-income | 118,721 | 48,432 | 18.4 | 40.8 | 51,655 | 43.5 | 18,634 | 15.7 |
| Middle-income | 162,810 | 100,206 | 38.1 | 61.5 | 48,788 | 30.0 | 13,816 | 8.5 |
| Upper-income | 132,751 | 103,167 | 39.3 | 77.7 | 21,113 | 15.9 | 8,471 | 6.4 |
| Unknown-income | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 471,925 | 262,781 | 100.0 | 55.7 | 151,192 | 32.0 | 57,952 | 12.3 |
| | Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | |
| Low-income | 3,604 | 8.2 | 2,911 | 7.6 | 670 | 12.9 | 23 | 6.4 |
| Moderate-income | 10,040 | 22.8 | 8,419 | 21.9 | 1,544 | 29.6 | 77 | 21.6 |
| Middle-income | 14,307 | 32.5 | 12,567 | 32.7 | 1,639 | 31.4 | 101 | 28.3 |
| Upper-income | 16,010 | 36.4 | 14,493 | 37.8 | 1,361 | 26.1 | 156 | 43.7 |
| Unknown-income | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 43,961 | 100.0 | 38,390 | 100.0 | 5,214 | 100.0 | 357 | 100.0 |
| | Percentage of Total Businesses: | | | 87.3 | | 11.9 | | .8 |
| | Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | |
| Low-income | 9 | 3.9 | 7 | 3.1 | 2 | 28.6 | 0 | 0.0 |
| Moderate-income | 26 | 11.2 | 26 | 11.5 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 79 | 33.9 | 77 | 34.1 | 2 | 28.6 | 0 | 0.0 |
| Upper-income | 119 | 51.1 | 116 | 51.3 | 3 | 42.9 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 233 | 100.0 | 226 | 100.0 | 7 | 100.0 | 0 | .0 |
| | Percentage of Total Farms: | | | 97.0 | | 3.0 | | .0 |

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area(s): North Side 2017

| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
|---------------------------------|---------------------------|------------------------------------|--------------------------|------------------|----------------------------------------------------|----------------------|---------------------------|--------------|
| | # | % | # | % | # | % | # | % |
| Low-income | 47 | 17.5 | 27,729 | 10.8 | 11,879 | 42.8 | 63,535 | 24.8 |
| Moderate-income | 69 | 25.7 | 55,512 | 21.7 | 9,812 | 17.7 | 41,240 | 16.1 |
| Middle-income | 76 | 28.4 | 82,252 | 32.2 | 6,404 | 7.8 | 47,009 | 18.4 |
| Upper-income | 73 | 27.2 | 89,819 | 35.1 | 3,383 | 3.8 | 104,051 | 40.7 |
| Unknown-income | 3 | 1.1 | 523 | 0.2 | 271 | 51.8 | 0 | 0.0 |
| Total Assessment Area | 268 | 100.0 | 255,835 | 100.0 | 31,749 | 12.4 | 255,835 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 69,349 | 14,755 | 5.8 | 21.3 | 38,259 | 55.2 | 16,335 | 23.6 |
| Moderate-income | 118,382 | 49,287 | 19.3 | 41.6 | 54,161 | 45.8 | 14,934 | 12.6 |
| Middle-income | 143,699 | 88,885 | 34.8 | 61.9 | 41,512 | 28.9 | 13,302 | 9.3 |
| Upper-income | 138,429 | 102,407 | 40.1 | 74.0 | 27,823 | 20.1 | 8,199 | 5.9 |
| Unknown-income | 1,743 | 298 | 0.1 | 17.1 | 937 | 53.8 | 508 | 29.1 |
| Total Assessment Area | 471,602 | 255,632 | 100.0 | 54.2 | 162,692 | 34.5 | 53,278 | 11.3 |
| | Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | # |
| Low-income | 3,555 | 9.1 | 2,852 | 8.5 | 668 | 13.0 | 35 | 10.1 |
| Moderate-income | 8,352 | 21.3 | 6,951 | 20.6 | 1,354 | 26.4 | 47 | 13.6 |
| Middle-income | 10,896 | 27.8 | 9,668 | 28.7 | 1,149 | 22.4 | 79 | 22.9 |
| Upper-income | 15,926 | 40.7 | 13,908 | 41.3 | 1,838 | 35.8 | 180 | 52.2 |
| Unknown-income | 424 | 1.1 | 291 | 0.9 | 129 | 2.5 | 4 | 1.2 |
| Total Assessment Area | 39,153 | 100.0 | 33,670 | 100.0 | 5,138 | 100.0 | 345 | 100.0 |
| Percentage of Total Businesses: | | | 86.0 | | 13.1 | | .9 | |
| | Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | # |
| Low-income | 6 | 2.9 | 5 | 2.5 | 1 | 14.3 | 0 | 0.0 |
| Moderate-income | 23 | 11.2 | 22 | 11.1 | 1 | 14.3 | 0 | 0.0 |
| Middle-income | 83 | 40.5 | 79 | 39.9 | 4 | 57.1 | 0 | 0.0 |
| Upper-income | 92 | 44.9 | 91 | 46.0 | 1 | 14.3 | 0 | 0.0 |
| Unknown-income | 1 | 0.5 | 1 | 0.5 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 205 | 100.0 | 198 | 100.0 | 7 | 100.0 | 0 | .0 |
| Percentage of Total Farms: | | | 96.6 | | 3.4 | | .0 | |

Combined Demographics Report

Assessment Area(s): North Side 2018

| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
|----------------------------------------|---------------------------|------------------------------------|--------------------------|------------------|----------------------------------------------------|----------------------|---------------------------|--------------|
| | # | % | # | % | # | % | # | % |
| Low-income | 47 | 17.5 | 27,729 | 10.8 | 11,879 | 42.8 | 63,535 | 24.8 |
| Moderate-income | 69 | 25.7 | 55,512 | 21.7 | 9,812 | 17.7 | 41,240 | 16.1 |
| Middle-income | 76 | 28.4 | 82,252 | 32.2 | 6,404 | 7.8 | 47,009 | 18.4 |
| Upper-income | 73 | 27.2 | 89,819 | 35.1 | 3,383 | 3.8 | 104,051 | 40.7 |
| Unknown-income | 3 | 1.1 | 523 | 0.2 | 271 | 51.8 | 0 | 0.0 |
| Total Assessment Area | 268 | 100.0 | 255,835 | 100.0 | 31,749 | 12.4 | 255,835 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 69,349 | 14,755 | 5.8 | 21.3 | 38,259 | 55.2 | 16,335 | 23.6 |
| Moderate-income | 118,382 | 49,287 | 19.3 | 41.6 | 54,161 | 45.8 | 14,934 | 12.6 |
| Middle-income | 143,699 | 88,885 | 34.8 | 61.9 | 41,512 | 28.9 | 13,302 | 9.3 |
| Upper-income | 138,429 | 102,407 | 40.1 | 74.0 | 27,823 | 20.1 | 8,199 | 5.9 |
| Unknown-income | 1,743 | 298 | 0.1 | 17.1 | 937 | 53.8 | 508 | 29.1 |
| Total Assessment Area | 471,602 | 255,632 | 100.0 | 54.2 | 162,692 | 34.5 | 53,278 | 11.3 |
| | Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | # |
| Low-income | 4,470 | 9.3 | 3,760 | 8.9 | 655 | 12.7 | 55 | 10.1 |
| Moderate-income | 10,412 | 21.7 | 8,960 | 21.2 | 1,374 | 26.7 | 78 | 14.4 |
| Middle-income | 13,482 | 28.1 | 12,192 | 28.9 | 1,156 | 22.4 | 134 | 24.7 |
| Upper-income | 19,070 | 39.8 | 16,962 | 40.2 | 1,839 | 35.7 | 269 | 49.5 |
| Unknown-income | 506 | 1.1 | 371 | 0.9 | 128 | 2.5 | 7 | 1.3 |
| Total Assessment Area | 47,940 | 100.0 | 42,245 | 100.0 | 5,152 | 100.0 | 543 | 100.0 |
| Percentage of Total Businesses: | | | | 88.1 | | 10.7 | | 1.1 |
| | Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | # |
| Low-income | 14 | 5.1 | 12 | 4.6 | 1 | 12.5 | 1 | 50.0 |
| Moderate-income | 30 | 11.0 | 29 | 11.1 | 1 | 12.5 | 0 | 0.0 |
| Middle-income | 106 | 39.0 | 101 | 38.5 | 4 | 50.0 | 1 | 50.0 |
| Upper-income | 121 | 44.5 | 119 | 45.4 | 2 | 25.0 | 0 | 0.0 |
| Unknown-income | 1 | 0.4 | 1 | 0.4 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 272 | 100.0 | 262 | 100.0 | 8 | 100.0 | 2 | 100.0 |
| Percentage of Total Farms: | | | | 96.3 | | 2.9 | | .7 |

APPENDIX C – LOAN DISTRIBUTION TABLES

HMDA Loan Distribution Table

Exam: North Side 2020 (2016 & 2017 Lending Data)

| Assessment Area/Group North Side 2016 | | | | | | | | |
|---------------------------------------|-----------------|---------------|--------------|---------------|--------------------|---------------|--------------|---------------|
| Income Categories | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase | | | | | | | | |
| Low | 1 | 3.8% | 46 | 1.0% | 2 | 7.7% | 89 | 1.9% |
| Moderate | 6 | 23.1% | 643 | 14.0% | 5 | 19.2% | 442 | 9.7% |
| Low/Moderate Total | 7 | 26.9% | 689 | 15.1% | 7 | 26.9% | 531 | 11.6% |
| Middle | 7 | 26.9% | 1,348 | 29.5% | 5 | 19.2% | 587 | 12.8% |
| Upper | 12 | 46.2% | 2,540 | 55.5% | 12 | 46.2% | 3,085 | 67.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2 | 7.7% | 374 | 8.2% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 26 | 100.0% | 4,577 | 100.0% | 26 | 100.0% | 4,577 | 100.0% |
| Refinance | | | | | | | | |
| Low | 1 | 3.7% | 98 | 3.2% | 5 | 18.5% | 368 | 11.9% |
| Moderate | 5 | 18.5% | 379 | 12.2% | 6 | 22.2% | 432 | 13.9% |
| Low/Moderate Total | 6 | 22.2% | 477 | 15.4% | 11 | 40.7% | 800 | 25.8% |
| Middle | 10 | 37.0% | 1,271 | 41.0% | 3 | 11.1% | 271 | 8.7% |
| Upper | 11 | 40.7% | 1,354 | 43.6% | 13 | 48.1% | 2,031 | 65.5% |
| 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 | 27 | 100.0% | 3,102 | 100.0% | 27 | 100.0% | 3,102 | 100.0% |
| Home Improvement | | | | | | | | |
| Low | 3 | 6.5% | 52 | 5.0% | 12 | 26.1% | 163 | 15.6% |
| Moderate | 12 | 26.1% | 258 | 24.6% | 4 | 8.7% | 56 | 5.3% |
| Low/Moderate Total | 15 | 32.6% | 310 | 29.6% | 16 | 34.8% | 219 | 20.9% |
| Middle | 16 | 34.8% | 349 | 33.3% | 6 | 13.0% | 152 | 14.5% |
| Upper | 15 | 32.6% | 389 | 37.1% | 24 | 52.2% | 677 | 64.6% |
| 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 | 46 | 100.0% | 1,048 | 100.0% | 46 | 100.0% | 1,048 | 100.0% |
| Multi-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 | 5 | 5.1% | 196 | 2.2% | 19 | 19.2% | 620 | 7.1% |
| Moderate | 23 | 23.2% | 1,280 | 14.7% | 15 | 15.2% | 930 | 10.7% |
| Low/Moderate Total | 28 | 28.3% | 1,476 | 16.9% | 34 | 34.3% | 1,550 | 17.8% |
| Middle | 33 | 33.3% | 2,968 | 34.0% | 14 | 14.1% | 1,010 | 11.6% |
| Upper | 38 | 38.4% | 4,283 | 49.1% | 49 | 49.5% | 5,793 | 66.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2 | 2.0% | 374 | 4.3% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 99 | 100.0% | 8,727 | 100.0% | 99 | 100.0% | 8,727 | 100.0% |

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: North Side 2020 (2016 & 2017 Lending Data)

Assessment Area/Group: North Side 2017

| Income Categories | HMDA | | | | | | | |
|--------------------|-------------------------|--------|----------|--------|--------------------|--------|----------|--------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | Home Purchase | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2 | 6.5% | 122 | 2.6% |
| Moderate | 4 | 12.9% | 321 | 6.8% | 4 | 12.9% | 226 | 4.8% |
| Low/Moderate Total | 4 | 12.9% | 321 | 6.8% | 6 | 19.4% | 348 | 7.4% |
| Middle | 14 | 43.2% | 1,743 | 36.8% | 7 | 22.6% | 546 | 11.5% |
| Upper | 13 | 41.9% | 2,666 | 56.4% | 18 | 58.1% | 3,836 | 81.1% |
| 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 | 31 | 100.0% | 4,730 | 100.0% | 31 | 100.0% | 4,730 | 100.0% |
| | Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4 | 16.0% | 328 | 10.0% |
| Moderate | 5 | 20.0% | 593 | 18.1% | 1 | 4.0% | 41 | 1.3% |
| Low/Moderate Total | 5 | 20.0% | 593 | 18.1% | 5 | 20.0% | 369 | 11.3% |
| Middle | 8 | 32.0% | 725 | 22.2% | 8 | 32.0% | 817 | 25.0% |
| Upper | 12 | 48.0% | 1,950 | 59.7% | 12 | 48.0% | 2,082 | 63.7% |
| 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 | 25 | 100.0% | 3,268 | 100.0% | 25 | 100.0% | 3,268 | 100.0% |
| | Home Improvement | | | | | | | |
| Low | 3 | 7.7% | 46 | 4.8% | 2 | 5.1% | 8 | 0.8% |
| Moderate | 8 | 20.5% | 179 | 18.6% | 3 | 7.7% | 59 | 6.1% |
| Low/Moderate Total | 11 | 28.2% | 225 | 23.3% | 5 | 12.8% | 67 | 7.0% |
| Middle | 17 | 43.6% | 484 | 50.2% | 9 | 23.1% | 137 | 14.2% |
| Upper | 11 | 28.2% | 255 | 26.5% | 25 | 64.1% | 760 | 78.8% |
| 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 | 39 | 100.0% | 964 | 100.0% | 39 | 100.0% | 964 | 100.0% |
| | Multi-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 | 3 | 3.2% | 46 | 0.5% | 8 | 8.4% | 458 | 5.1% |
| Moderate | 17 | 17.9% | 1,093 | 12.2% | 8 | 8.4% | 326 | 3.6% |
| Low/Moderate Total | 20 | 21.1% | 1,139 | 12.7% | 16 | 16.8% | 784 | 8.7% |
| Middle | 39 | 41.1% | 2,952 | 32.9% | 24 | 25.3% | 1,500 | 16.7% |
| Upper | 36 | 37.9% | 4,871 | 54.4% | 55 | 57.9% | 6,678 | 74.5% |
| 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 | 95 | 100.0% | 8,962 | 100.0% | 95 | 100.0% | 8,962 | 100.0% |

*Information based on 2015 ACS data

HMDA Loan Distribution Table

Exam: North Side 2020 (2018 Lending Data)

Assessment Area/Group :North Side 2018

| Income Categories | HMDA | | | | | | | |
|--------------------|------------------------------------|--------|----------|--------|--------------------|--------|----------|--------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | Home Purchase | | | | | | | |
| Low | 5 | 10.0% | 353 | 3.9% | 6 | 12.0% | 398 | 4.4% |
| Moderate | 8 | 16.0% | 811 | 9.1% | 5 | 10.0% | 530 | 5.9% |
| Low/Moderate Total | 13 | 26.0% | 1,164 | 13.0% | 11 | 22.0% | 929 | 10.4% |
| Middle | 19 | 38.0% | 1,865 | 20.8% | 9 | 18.0% | 1,007 | 11.2% |
| Upper | 18 | 36.0% | 5,925 | 66.2% | 28 | 56.0% | 6,864 | 76.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2 | 4.0% | 154 | 1.7% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 50 | 100.0% | 8,954 | 100.0% | 50 | 100.0% | 8,954 | 100.0% |
| | Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 7 | 17.0% | 510 | 8.3% |
| Moderate | 10 | 25.6% | 935 | 15.3% | 5 | 12.8% | 382 | 6.3% |
| Low/Moderate Total | 10 | 25.6% | 935 | 15.3% | 12 | 30.8% | 892 | 14.6% |
| Middle | 13 | 33.3% | 1,186 | 19.4% | 6 | 15.4% | 637 | 10.4% |
| Upper | 16 | 41.0% | 3,990 | 65.3% | 18 | 46.2% | 4,309 | 70.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 3 | 7.7% | 273 | 4.5% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 39 | 100.0% | 6,111 | 100.0% | 39 | 100.0% | 6,111 | 100.0% |
| | Home Improvement | | | | | | | |
| Low | 10 | 14.9% | 206 | 11.0% | 7 | 10.4% | 169 | 9.0% |
| Moderate | 14 | 20.9% | 368 | 19.6% | 13 | 19.4% | 159 | 8.4% |
| Low/Moderate Total | 24 | 35.8% | 574 | 30.5% | 20 | 29.9% | 328 | 17.4% |
| Middle | 26 | 38.8% | 863 | 45.9% | 16 | 23.9% | 487 | 25.9% |
| Upper | 17 | 25.4% | 444 | 23.6% | 30 | 44.8% | 1,064 | 56.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1 | 1.5% | 2 | 0.1% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 67 | 100.0% | 1,882 | 100.0% | 67 | 100.0% | 1,882 | 100.0% |
| | Multi-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% |
| | Other Purpose LOC | | | | | | | |
| 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% |
| | Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 2 | 25.0% | 102 | 20.0% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 2 | 25.0% | 102 | 20.0% |
| Middle | 2 | 25.0% | 74 | 14.5% | 1 | 12.5% | 14 | 2.7% |
| Upper | 6 | 75.0% | 437 | 85.5% | 4 | 50.0% | 175 | 34.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1 | 12.5% | 220 | 43.1% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 8 | 100.0% | 511 | 100.0% | 8 | 100.0% | 511 | 100.0% |
| | Loan Purpose Not Applicable | | | | | | | |
| 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 Loan Distribution Table

Exam: North Side 2020 (2018 Lending Data)

Assessment Area/Group :North Side 2018

| Income Categories | HMDA | | | | | | | |
|--------------------|-----------------|--------|----------|--------|--------------------|--------|----------|--------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | HMDA Totals | | | | | | | |
| Low | 15 | 9.1% | 560 | 3.2% | 20 | 12.2% | 1,077 | 6.2% |
| Moderate | 32 | 19.5% | 2,114 | 12.1% | 25 | 15.2% | 1,174 | 6.7% |
| Low/Moderate Total | 47 | 28.7% | 2,673 | 15.3% | 45 | 27.4% | 2,251 | 12.9% |
| Middle | 60 | 36.6% | 3,988 | 22.8% | 32 | 19.5% | 2,145 | 12.3% |
| Upper | 57 | 34.8% | 10,796 | 61.8% | 80 | 48.8% | 12,413 | 71.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 7 | 4.3% | 649 | 3.7% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 164 | 100.0% | 17,458 | 100.0% | 164 | 100.0% | 17,458 | 100.0% |

*Information based on 2015 ACS data

Consumer Loan Distribution Table

Exam: North Side 2020 (2018 Lending Data)

Assessment Area/Group :North Side 2018

| | CONSUMER LOANS | | | | | | | |
|--------------------|-----------------------------|--------|----------|--------|--------------------|--------|----------|--------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | Motor Vehicle | | | | | | | |
| Low | 2 | 3.6% | 22 | 2.5% | 12 | 21.8% | 115 | 13.5% |
| Moderate | 15 | 27.3% | 157 | 18.3% | 12 | 21.8% | 150 | 17.6% |
| Low/Moderate Total | 17 | 30.9% | 179 | 20.9% | 24 | 43.6% | 266 | 31.1% |
| Middle | 25 | 45.5% | 386 | 45.2% | 9 | 16.4% | 92 | 10.8% |
| Upper | 13 | 23.6% | 290 | 33.9% | 13 | 23.6% | 235 | 27.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 9 | 16.4% | 261 | 30.5% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 55 | 100.0% | 854 | 100.0% | 55 | 100.0% | 854 | 100.0% |
| | Other - Secured | | | | | | | |
| Low | 6 | 20.0% | 117 | 23.3% | 6 | 20.0% | 10 | 1.9% |
| Moderate | 5 | 16.7% | 37 | 7.5% | 5 | 16.7% | 6 | 1.2% |
| Low/Moderate Total | 11 | 36.7% | 155 | 30.8% | 11 | 36.7% | 16 | 3.1% |
| Middle | 4 | 13.3% | 108 | 21.5% | 3 | 10.0% | 25 | 5.0% |
| Upper | 15 | 50.0% | 240 | 47.7% | 5 | 16.7% | 213 | 42.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 11 | 36.7% | 249 | 49.5% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 30 | 100.0% | 503 | 100.0% | 30 | 100.0% | 503 | 100.0% |
| | Other - Unsecured | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 9 | 36.0% | 44 | 19.5% |
| Moderate | 11 | 44.0% | 63 | 27.9% | 1 | 4.0% | 6 | 2.7% |
| Low/Moderate Total | 11 | 44.0% | 63 | 27.9% | 10 | 40.0% | 50 | 22.1% |
| Middle | 10 | 40.0% | 95 | 42.0% | 7 | 28.0% | 41 | 18.3% |
| Upper | 4 | 16.0% | 68 | 30.1% | 3 | 12.0% | 75 | 33.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 5 | 20.0% | 59 | 26.3% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 25 | 100.0% | 226 | 100.0% | 25 | 100.0% | 226 | 100.0% |
| | Consumer Loan Totals | | | | | | | |
| Low | 8 | 7.3% | 139 | 8.8% | 27 | 24.5% | 169 | 10.7% |
| Moderate | 31 | 28.2% | 257 | 16.2% | 18 | 16.4% | 162 | 10.3% |
| Low/Moderate Total | 39 | 35.5% | 396 | 25.0% | 45 | 40.9% | 331 | 20.9% |
| Middle | 39 | 35.5% | 589 | 37.2% | 19 | 17.3% | 159 | 10.0% |
| Upper | 32 | 29.1% | 598 | 37.8% | 21 | 19.1% | 523 | 33.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 25 | 22.7% | 569 | 36.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 110 | 100.0% | 1,583 | 100.0% | 110 | 100.0% | 1,583 | 100.0% |

CRA Loan Distribution Table

Exam: North Side 2020 (2018 Lending Data)

Assessment Area/Group: North Side 2018

| Income Categories | SMALL BUSINESS | | | | SMALL FARM | | | | SMALL BUS. SECURED BY REAL ESTATE | | | |
|---------------------------------------------|-----------------------------------------------------|--------|----------|--------|------------|------|----------|------|-----------------------------------|------|----------|------|
| | # | % | \$(000s) | % | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | By Tract Income | | | | | | | | | | | |
| Low | 136 | 33.7% | 15,915 | 14.5% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 96 | 23.8% | 36,878 | 33.7% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 232 | 57.4% | 52,793 | 48.3% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Middle | 45 | 11.1% | 17,351 | 15.9% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Upper | 127 | 31.4% | 39,239 | 35.9% | 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 | 404 | 100.0% | 109,383 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| | By Revenue | | | | | | | | | | | |
| Total \$1 Million or Less | 8 | 2.0% | 4,750 | 4.3% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million | 22 | 5.4% | 6,113 | 5.6% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Not Known | 374 | 92.6% | 98,520 | 90.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 404 | 100.0% | 109,383 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| | By Loan Size | | | | | | | | | | | |
| \$100,000 or less | 312 | 77.2% | 4,215 | 3.9% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 24 | 5.9% | 4,132 | 3.8% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 42 | 10.4% | 22,221 | 20.3% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 26 | 6.4% | 78,814 | 72.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 404 | 100.0% | 109,383 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| | By Loan Size and Revenue \$1 Million or Less | | | | | | | | | | | |
| \$100,000 or less | 2 | 25.0% | 100 | 2.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 1 | 12.5% | 150 | 3.2% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 4 | 50.0% | 2,500 | 52.6% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 1 | 12.5% | 2,000 | 42.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 8 | 100.0% | 4,750 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |

*Information based on Test data

Peer Group HMDA Loan Distribution Table

Exam ID: North Side 2020 (2016 & 2017 Lending Data)

Selected Year: 2016

North Side 2016

| | HMDA | | | | | | | |
|---------------------------|-------------------------|----------------|------------------|----------------|--------------------|----------------|------------------|----------------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | Home Purchase | | | | | | | |
| Low | 571 | 3.2 % | 82,874 | 2.6 % | 1,582 | 8.8 % | 136,279 | 4.3 % |
| Moderate | 3,065 | 17.0 % | 361,744 | 11.4 % | 3,680 | 20.4 % | 422,863 | 13.3 % |
| <i>Low/Moderate Total</i> | <i>3,636</i> | <i>20.1 %</i> | <i>444,618</i> | <i>14.0 %</i> | <i>5,262</i> | <i>29.1 %</i> | <i>559,142</i> | <i>17.6 %</i> |
| Middle | 7,104 | 39.3 % | 1,020,404 | 32.1 % | 3,263 | 18.1 % | 502,696 | 15.8 % |
| Upper | 7,323 | 40.5 % | 1,714,019 | 53.9 % | 6,357 | 35.2 % | 1,644,351 | 51.7 % |
| Unknown | 0 | 0.0 % | 0 | 0.0 % | 3,181 | 17.6 % | 472,852 | 14.9 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 18,063 | 100.0 % | 3,179,041 | 100.0 % | 18,063 | 100.0 % | 3,179,041 | 100.0 % |
| | Refinance | | | | | | | |
| Low | 313 | 2.4 % | 37,718 | 1.6 % | 735 | 5.6 % | 59,627 | 2.6 % |
| Moderate | 1,621 | 12.3 % | 181,376 | 7.8 % | 1,601 | 12.1 % | 166,752 | 7.1 % |
| <i>Low/Moderate Total</i> | <i>1,934</i> | <i>14.7 %</i> | <i>219,094</i> | <i>9.4 %</i> | <i>2,336</i> | <i>17.7 %</i> | <i>226,379</i> | <i>9.7 %</i> |
| Middle | 4,408 | 33.4 % | 598,248 | 25.6 % | 2,240 | 17.0 % | 294,691 | 12.6 % |
| Upper | 6,856 | 51.9 % | 1,520,093 | 65.0 % | 6,244 | 47.3 % | 1,442,504 | 61.7 % |
| Unknown | 0 | 0.0 % | 0 | 0.0 % | 2,378 | 18.0 % | 373,861 | 16.0 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 13,198 | 100.0 % | 2,337,435 | 100.0 % | 13,198 | 100.0 % | 2,337,435 | 100.0 % |
| | Home Improvement | | | | | | | |
| Low | 38 | 2.6 % | 5,449 | 3.3 % | 107 | 7.4 % | 4,076 | 2.5 % |
| Moderate | 222 | 15.3 % | 12,387 | 7.5 % | 233 | 16.0 % | 13,887 | 8.4 % |
| <i>Low/Moderate Total</i> | <i>260</i> | <i>17.9 %</i> | <i>17,836</i> | <i>10.7 %</i> | <i>340</i> | <i>23.4 %</i> | <i>17,963</i> | <i>10.8 %</i> |
| Middle | 485 | 33.4 % | 38,704 | 23.3 % | 297 | 20.5 % | 23,426 | 14.1 % |
| Upper | 707 | 48.7 % | 109,578 | 66.0 % | 732 | 50.4 % | 109,152 | 65.7 % |
| Unknown | 0 | 0.0 % | 0 | 0.0 % | 83 | 5.7 % | 15,577 | 9.4 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 1,452 | 100.0 % | 166,118 | 100.0 % | 1,452 | 100.0 % | 166,118 | 100.0 % |
| | Multi-Family | | | | | | | |
| Low | 39 | 19.3 % | 75,172 | 12.5 % | 0 | 0.0 % | 0 | 0.0 % |
| Moderate | 61 | 30.2 % | 246,058 | 40.8 % | 0 | 0.0 % | 0 | 0.0 % |
| <i>Low/Moderate Total</i> | <i>100</i> | <i>49.5 %</i> | <i>321,230</i> | <i>53.3 %</i> | <i>0</i> | <i>0.0 %</i> | <i>0</i> | <i>0.0 %</i> |
| Middle | 71 | 35.1 % | 226,870 | 37.6 % | 0 | 0.0 % | 0 | 0.0 % |
| Upper | 31 | 15.3 % | 54,787 | 9.1 % | 0 | 0.0 % | 0 | 0.0 % |
| Unknown | 0 | 0.0 % | 0 | 0.0 % | 202 | 100.0 % | 602,887 | 100.0 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 202 | 100.0 % | 602,887 | 100.0 % | 202 | 100.0 % | 602,887 | 100.0 % |
| | HMDA Totals | | | | | | | |
| Low | 961 | 2.9 % | 201,213 | 3.2 % | 2,424 | 7.4 % | 199,982 | 3.2 % |
| Moderate | 4,969 | 15.1 % | 801,565 | 12.8 % | 5,514 | 16.8 % | 603,502 | 9.6 % |
| <i>Low/Moderate Total</i> | <i>5,930</i> | <i>18.0 %</i> | <i>1,002,778</i> | <i>16.0 %</i> | <i>7,938</i> | <i>24.1 %</i> | <i>803,484</i> | <i>12.8 %</i> |
| Middle | 12,068 | 36.7 % | 1,884,226 | 30.0 % | 5,800 | 17.6 % | 820,813 | 13.1 % |
| Upper | 14,917 | 45.3 % | 3,398,477 | 54.1 % | 13,333 | 40.5 % | 3,196,007 | 50.8 % |
| Unknown | 0 | 0.0 % | 0 | 0.0 % | 5,844 | 17.8 % | 1,465,177 | 23.3 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 32,915 | 100.0 % | 6,285,481 | 100.0 % | 32,915 | 100.0 % | 6,285,481 | 100.0 % |

Peer Group HMDA Loan Distribution Table

Exam ID: North Side 2020 (2016 & 2017 Lending Data)

Selected Year: 2017

North Side 2017

| | HMDA | | | | | | | |
|---------------------------|-------------------------|----------------|------------------|----------------|--------------------|----------------|------------------|----------------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | Home Purchase | | | | | | | |
| Low | 850 | 4.4 % | 113,851 | 3.2 % | 1,915 | 9.9 % | 174,389 | 5.0 % |
| Moderate | 3,841 | 19.8 % | 431,200 | 12.2 % | 3,980 | 20.6 % | 492,729 | 14.0 % |
| <i>Low/Moderate Total</i> | <i>4,691</i> | <i>24.2 %</i> | <i>545,051</i> | <i>15.5 %</i> | <i>5,895</i> | <i>30.5 %</i> | <i>667,118</i> | <i>18.9 %</i> |
| Middle | 7,072 | 36.5 % | 1,078,511 | 30.6 % | 3,652 | 18.9 % | 595,716 | 16.9 % |
| Upper | 7,553 | 39.0 % | 1,893,499 | 53.8 % | 6,359 | 32.9 % | 1,731,038 | 49.2 % |
| Unknown | 35 | 0.2 % | 4,600 | 0.1 % | 3,445 | 17.8 % | 527,789 | 15.0 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 19,351 | 100.0 % | 3,521,661 | 100.0 % | 19,351 | 100.0 % | 3,521,661 | 100.0 % |
| | Refinance | | | | | | | |
| Low | 371 | 4.5 % | 41,808 | 3.0 % | 690 | 8.4 % | 54,020 | 3.9 % |
| Moderate | 1,346 | 16.3 % | 134,631 | 9.7 % | 1,356 | 16.4 % | 137,471 | 9.9 % |
| <i>Low/Moderate Total</i> | <i>1,717</i> | <i>20.8 %</i> | <i>176,439</i> | <i>12.8 %</i> | <i>2,046</i> | <i>24.8 %</i> | <i>191,491</i> | <i>13.8 %</i> |
| Middle | 2,866 | 34.7 % | 376,442 | 27.2 % | 1,735 | 21.0 % | 231,088 | 16.7 % |
| Upper | 3,650 | 44.3 % | 826,002 | 59.7 % | 3,132 | 38.0 % | 744,118 | 53.8 % |
| Unknown | 15 | 0.2 % | 4,164 | 0.3 % | 1,335 | 16.2 % | 216,350 | 15.6 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 8,248 | 100.0 % | 1,383,047 | 100.0 % | 8,248 | 100.0 % | 1,383,047 | 100.0 % |
| | Home Improvement | | | | | | | |
| Low | 188 | 10.0 % | 7,393 | 4.9 % | 262 | 13.9 % | 6,755 | 4.5 % |
| Moderate | 469 | 24.9 % | 17,748 | 11.8 % | 362 | 19.2 % | 13,890 | 9.2 % |
| <i>Low/Moderate Total</i> | <i>657</i> | <i>34.9 %</i> | <i>25,141</i> | <i>16.7 %</i> | <i>624</i> | <i>33.1 %</i> | <i>20,645</i> | <i>13.7 %</i> |
| Middle | 607 | 32.2 % | 37,515 | 24.9 % | 429 | 22.8 % | 27,019 | 17.9 % |
| Upper | 619 | 32.8 % | 87,764 | 58.3 % | 757 | 40.2 % | 90,787 | 60.3 % |
| Unknown | 2 | 0.1 % | 143 | 0.1 % | 75 | 4.0 % | 12,112 | 8.0 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 1,885 | 100.0 % | 150,563 | 100.0 % | 1,885 | 100.0 % | 150,563 | 100.0 % |
| | Multi-Family | | | | | | | |
| Low | 60 | 26.1 % | 108,376 | 18.4 % | 0 | 0.0 % | 0 | 0.0 % |
| Moderate | 77 | 33.5 % | 166,384 | 28.3 % | 0 | 0.0 % | 0 | 0.0 % |
| <i>Low/Moderate Total</i> | <i>137</i> | <i>59.6 %</i> | <i>274,760</i> | <i>46.7 %</i> | <i>0</i> | <i>0.0 %</i> | <i>0</i> | <i>0.0 %</i> |
| Middle | 56 | 24.3 % | 132,668 | 22.5 % | 0 | 0.0 % | 0 | 0.0 % |
| Upper | 37 | 16.1 % | 181,244 | 30.8 % | 0 | 0.0 % | 0 | 0.0 % |
| Unknown | 0 | 0.0 % | 0 | 0.0 % | 230 | 100.0 % | 588,672 | 100.0 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 230 | 100.0 % | 588,672 | 100.0 % | 230 | 100.0 % | 588,672 | 100.0 % |
| | HMDA Totals | | | | | | | |
| Low | 1,469 | 4.9 % | 271,428 | 4.8 % | 2,867 | 9.6 % | 235,164 | 4.2 % |
| Moderate | 5,733 | 19.3 % | 749,963 | 13.3 % | 5,698 | 19.2 % | 644,090 | 11.4 % |
| <i>Low/Moderate Total</i> | <i>7,202</i> | <i>24.2 %</i> | <i>1,021,391</i> | <i>18.1 %</i> | <i>8,565</i> | <i>28.8 %</i> | <i>879,254</i> | <i>15.6 %</i> |
| Middle | 10,601 | 35.7 % | 1,625,136 | 28.8 % | 5,816 | 19.6 % | 853,823 | 15.1 % |
| Upper | 11,859 | 39.9 % | 2,988,509 | 53.0 % | 10,248 | 34.5 % | 2,565,943 | 45.5 % |
| Unknown | 52 | 0.2 % | 8,907 | 0.2 % | 5,085 | 17.1 % | 1,344,923 | 23.8 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 29,714 | 100.0 % | 5,643,943 | 100.0 % | 29,714 | 100.0 % | 5,643,943 | 100.0 % |

Peer Group HMDA Loan Distribution Table

Exam ID: North Side 2020 (2018 Lending Data)

Selected Year: 2018

North Side 2018

| | HMDA | | | | | | | |
|---------------------------|------------------------------------|----------------|------------------|----------------|--------------------|----------------|------------------|----------------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | Home Purchase | | | | | | | |
| Low | 827 | 4.3 % | 111,379 | 3.0 % | 2,034 | 10.5 % | 200,580 | 5.5 % |
| Moderate | 3,743 | 19.4 % | 449,775 | 12.3 % | 4,300 | 22.3 % | 566,290 | 15.5 % |
| <i>Low/Moderate Total</i> | <i>4,570</i> | <i>23.7 %</i> | <i>561,154</i> | <i>15.4 %</i> | <i>6,334</i> | <i>32.8 %</i> | <i>766,870</i> | <i>21.0 %</i> |
| Middle | 7,134 | 37.0 % | 1,145,497 | 31.4 % | 3,668 | 19.0 % | 627,188 | 17.2 % |
| Upper | 7,576 | 39.2 % | 1,940,259 | 53.1 % | 6,594 | 34.2 % | 1,820,711 | 49.9 % |
| Unknown | 25 | 0.1 % | 5,238 | 0.1 % | 2,709 | 14.0 % | 437,379 | 12.0 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 19,305 | 100.0 % | 3,652,148 | 100.0 % | 19,305 | 100.0 % | 3,652,148 | 100.0 % |
| | Refinance | | | | | | | |
| Low | 333 | 4.2 % | 35,261 | 2.8 % | 861 | 10.8 % | 68,874 | 5.6 % |
| Moderate | 1,257 | 15.8 % | 129,537 | 10.4 % | 1,466 | 18.4 % | 151,860 | 12.2 % |
| <i>Low/Moderate Total</i> | <i>1,590</i> | <i>20.0 %</i> | <i>164,798</i> | <i>13.3 %</i> | <i>2,327</i> | <i>29.3 %</i> | <i>220,734</i> | <i>17.8 %</i> |
| Middle | 2,715 | 34.1 % | 340,992 | 27.5 % | 1,707 | 21.5 % | 215,337 | 17.4 % |
| Upper | 3,644 | 45.8 % | 733,232 | 59.1 % | 3,178 | 40.0 % | 685,311 | 55.3 % |
| Unknown | 5 | 0.1 % | 1,167 | 0.1 % | 742 | 9.3 % | 118,807 | 9.6 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 7,954 | 100.0 % | 1,240,189 | 100.0 % | 7,954 | 100.0 % | 1,240,189 | 100.0 % |
| | Home Improvement | | | | | | | |
| Low | 184 | 7.1 % | 5,340 | 3.4 % | 296 | 11.5 % | 8,332 | 5.3 % |
| Moderate | 459 | 17.8 % | 15,563 | 9.9 % | 481 | 18.6 % | 18,276 | 11.6 % |
| <i>Low/Moderate Total</i> | <i>643</i> | <i>24.9 %</i> | <i>20,903</i> | <i>13.3 %</i> | <i>777</i> | <i>30.1 %</i> | <i>26,608</i> | <i>16.9 %</i> |
| Middle | 785 | 30.4 % | 44,474 | 28.2 % | 490 | 19.0 % | 23,634 | 15.0 % |
| Upper | 1,152 | 44.6 % | 92,125 | 58.5 % | 1,200 | 46.5 % | 95,407 | 60.5 % |
| Unknown | 3 | 0.1 % | 79 | 0.1 % | 116 | 4.5 % | 11,932 | 7.6 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 2,583 | 100.0 % | 157,581 | 100.0 % | 2,583 | 100.0 % | 157,581 | 100.0 % |
| | Multi-Family | | | | | | | |
| Low | 51 | 20.7 % | 86,514 | 14.2 % | 1 | 0.4 % | 143 | 0.0 % |
| Moderate | 84 | 34.1 % | 163,050 | 26.9 % | 1 | 0.4 % | 200 | 0.0 % |
| <i>Low/Moderate Total</i> | <i>135</i> | <i>54.9 %</i> | <i>249,564</i> | <i>41.1 %</i> | <i>2</i> | <i>0.8 %</i> | <i>343</i> | <i>0.1 %</i> |
| Middle | 71 | 28.9 % | 228,158 | 37.6 % | 0 | 0.0 % | 0 | 0.0 % |
| Upper | 37 | 15.0 % | 122,963 | 20.3 % | 4 | 1.6 % | 1,884 | 0.3 % |
| Unknown | 3 | 1.2 % | 6,462 | 1.1 % | 240 | 97.6 % | 604,920 | 99.6 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 246 | 100.0 % | 607,147 | 100.0 % | 246 | 100.0 % | 607,147 | 100.0 % |
| | Other Purpose LOC | | | | | | | |
| Low | 45 | 2.9 % | 2,353 | 2.0 % | 141 | 9.2 % | 6,292 | 5.4 % |
| Moderate | 168 | 11.0 % | 7,842 | 6.7 % | 254 | 16.6 % | 12,696 | 10.8 % |
| <i>Low/Moderate Total</i> | <i>213</i> | <i>13.9 %</i> | <i>10,195</i> | <i>8.7 %</i> | <i>395</i> | <i>25.9 %</i> | <i>18,988</i> | <i>16.2 %</i> |
| Middle | 492 | 32.2 % | 29,225 | 24.9 % | 344 | 22.5 % | 20,973 | 17.9 % |
| Upper | 821 | 53.7 % | 77,708 | 66.2 % | 749 | 49.0 % | 74,413 | 63.4 % |
| Unknown | 2 | 0.1 % | 254 | 0.2 % | 40 | 2.6 % | 3,008 | 2.6 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 1,528 | 100.0 % | 117,382 | 100.0 % | 1,528 | 100.0 % | 117,382 | 100.0 % |
| | Other Purpose Closed/Exempt | | | | | | | |
| Low | 28 | 5.5 % | 2,249 | 3.8 % | 58 | 11.5 % | 2,861 | 4.8 % |
| Moderate | 79 | 15.6 % | 8,374 | 14.2 % | 97 | 19.2 % | 5,863 | 9.9 % |

| | | | | | | | | |
|---------------------------|---------------|----------------|------------------|----------------|---------------|----------------|------------------|----------------|
| <i>Low/Moderate Total</i> | 107 | 21.2 % | 10,623 | 18.0 % | 155 | 30.7 % | 8,724 | 14.8 % |
| Middle | 158 | 31.3 % | 12,494 | 21.1 % | 98 | 19.4 % | 12,098 | 20.5 % |
| Upper | 239 | 47.3 % | 35,942 | 60.8 % | 227 | 45.0 % | 34,761 | 58.8 % |
| Unknown | 1 | 0.2 % | 15 | 0.0 % | 25 | 5.0 % | 3,491 | 5.9 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 505 | 100.0 % | 59,074 | 100.0 % | 505 | 100.0 % | 59,074 | 100.0 % |
| NA Purpose | | | | | | | | |
| Low | 83 | 9.6 % | 7,002 | 7.3 % | 34 | 3.9 % | 2,161 | 2.2 % |
| Moderate | 261 | 30.1 % | 21,841 | 22.7 % | 12 | 1.4 % | 959 | 1.0 % |
| <i>Low/Moderate Total</i> | <i>344</i> | <i>39.7 %</i> | <i>28,843</i> | <i>29.9 %</i> | <i>46</i> | <i>5.3 %</i> | <i>3,120</i> | <i>3.2 %</i> |
| Middle | 282 | 32.5 % | 29,765 | 30.9 % | 10 | 1.2 % | 425 | 0.4 % |
| Upper | 241 | 27.8 % | 37,713 | 39.2 % | 15 | 1.7 % | 1,889 | 2.0 % |
| Unknown | 0 | 0.0 % | 0 | 0.0 % | 796 | 91.8 % | 90,887 | 94.4 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 867 | 100.0 % | 96,321 | 100.0 % | 867 | 100.0 % | 96,321 | 100.0 % |
| HMDA Totals | | | | | | | | |
| Low | 1,551 | 4.7 % | 250,098 | 4.2 % | 3,425 | 10.4 % | 289,243 | 4.9 % |
| Moderate | 6,051 | 18.3 % | 795,982 | 13.4 % | 6,611 | 20.0 % | 756,144 | 12.8 % |
| <i>Low/Moderate Total</i> | <i>7,602</i> | <i>23.0 %</i> | <i>1,046,080</i> | <i>17.6 %</i> | <i>10,036</i> | <i>30.4 %</i> | <i>1,045,387</i> | <i>17.6 %</i> |
| Middle | 11,637 | 35.3 % | 1,830,605 | 30.9 % | 6,317 | 19.1 % | 899,655 | 15.2 % |
| Upper | 13,710 | 41.6 % | 3,039,942 | 51.3 % | 11,967 | 36.3 % | 2,714,376 | 45.8 % |
| Unknown | 39 | 0.1 % | 13,215 | 0.2 % | 4,668 | 14.2 % | 1,270,424 | 21.4 % |
| Tract Unknown | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % | 0 | 0.0 % |
| Total | 32,988 | 100.0 % | 5,929,842 | 100.0 % | 32,988 | 100.0 % | 5,929,842 | 100.0 % |

APPENDIX D – GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate of all lenders 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) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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