

# PUBLIC DISCLOSURE

April 1, 1997

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank: Fifth Third Bank of Southern Ohio  
#04396535  
100 South High Street  
Hillsboro, Ohio 45133

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

NOTE: 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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## **I. GENERAL INFORMATION**

The Community Reinvestment Act ("CRA") requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act ("CRA") performance of Fifth Third Bank of Southern Ohio prepared by the Federal Reserve Bank of Cleveland, the institution's supervisory agency, as of April 1, 1997. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include visits to some, but not necessarily all, of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A of 12 CFR Part 228.



## II. DESCRIPTION OF INSTITUTION

Fifth Third Bank of Southern Ohio (FTBSO), Hillsboro, Ohio, is a subsidiary of Fifth Third Bancorp, Cincinnati, Ohio. Other subsidiaries of Fifth Third Bancorp include banks in Ohio, Indiana, Kentucky, and Florida; Fifth Third Community Development Corporation; Fifth Third Investment Company; Fountain Square Insurance Company; and Money Station, an ATM network. Fifth Third Bancorp had total assets of \$20 billion as of December 31, 1996. FTBSO had total assets of \$502 million as of December 31, 1996, which comprised 2.5% of the Bancorp's total assets.

FTBSO is a full-service financial institution with a primary business focus on real estate, commercial, and consumer lending. Table 1 presents several key financial ratios for FTBSO.

<b>Return on Average Assets</b>	1.89%
<b>Net Loans &amp; Leases to Average Assets</b>	56.87%
<b>Investments to Average Assets</b>	39.07%
<b>Total Deposits to Average Assets</b>	74.29%
<b>Net Loans &amp; Leases to Total Deposits</b>	77.29%
<b>1-4 Family Residential Loans to Average Loans</b>	28.74%
<b>Consumer Loans* to Average Loans</b>	26.22%
<b>Commercial Loans** to Average Loans</b>	29.49%
<b>Agricultural Loans to Average Loans</b>	10.19%
<b>Lease Financing Receivables to Average Loans</b>	4.99%

\* Includes loans to individuals and credit card loans.

\*\* Includes commercial & industrial loans, commercial real estate loans, and construction & development loans

FTBSO's asset size and financial condition indicate it has the ability to meet the credit needs of its assessment areas. There are no legal or other impediments which would hamper FTBSO's ability to meet the community's credit needs.



### III. DESCRIPTION OF ASSESSMENT AREA

FTBSO has defined one assessment area which includes Adams, Brown, Clinton, Fayette, Highland, Ross, and Scioto Counties. The assessment area complies with the requirements of the Community Reinvestment Act and does not arbitrarily exclude low- or moderate-income geographies (i.e., census tracts or block numbering areas).

Tables 2 and 3 present relevant demographic information for the assessment area. The median family income for the assessment area is \$29,580.

<b>Type of Geography*</b>	<b># and % of Geographies</b>	<b># and % of Population</b>	<b># and % of Families</b>	<b># and % of O-O** Units</b>
<b>Low-Income</b>	1 1%	2,741 1%	517 1%	342 1%
<b>Moderate-Income</b>	35 48%	141,868 46%	39,146 46%	36,197 45%
<b>Middle-Income</b>	37 50%	159,695 52%	43,498 51%	41,451 52%
<b>Upper-Income</b>	1 1%	4,299 1%	1,303 2%	1,173 2%
<b>Total</b>	74	308,603	84,464	79,163

\* Geographies are classified as follows: low-income geographies have median family incomes less than 50% of the area median family income, moderate-income geographies have median family income from 50% to less than 80% of the area median family income, middle-income geographies have median family income from 80% to less than 120% of the area median family income, and upper-income geographies have median family income equal to or greater than 120% of the area median family income.

\*\* Owner-occupied units.

<b>Table 3 Demographic Data by Income Level</b>		
<b>Family Income Level*</b>	<b>Number of Families</b>	<b>% of Families</b>
<b>Low-Income</b>	23,796	28%
<b>Moderate-Income</b>	16,385	20%
<b>Middle-Income</b>	18,887	22%
<b>Upper-Income</b>	25,396	30%
<b>Below Poverty Level**</b>	13,781	16%

\* Family income levels are classified as follows: low-income families have median family incomes less than 50% of the area median family income, moderate-income families have median family income from 50% to less than 80% of the area median family income, middle-income families have median family income from 80% to less than 120% of the area median family income, and upper-income families have median family income equal to or greater than 120% of the area median family income.

\*\* Subset of low-income families.

The assessment area has 121,936 housing units, of which 65% are owner-occupied, 27% are rental units, and 8% are vacant. One- to four-family units comprise 79% of the housing stock, while multi-family units of five or more comprise 6% and mobile homes comprise 14% of the remaining housing stock. The median housing value is \$48,824 and the median gross rent is \$327 per month. The median housing age is 28 years, with 37% of the housing stock built prior to 1950.

The manufacturing, retail, and service industries employ the largest number of employees. The area's major employers include General Electric Company, Cincinnati Milacron, U.S. Shoe, Airborne Express, Weastec, Inc., Mead Corporation, and Martin Marietta Energy. Of the 7,214 establishments operating in the assessment area, the majority are small businesses, with 95% employing less than 50 employees, 5% employing between 50 and 499 employees, and a negligible number employing 500 or more employees.

The local economies are good but have experienced little growth in employment. The unemployment rates in the counties comprising the assessment area range from 3.7% to 12.0%, with an average unemployment rate of 7.1%. This rate is notably higher than the average unemployment rate for the State of Ohio of 4.8%. Table 4 details the



unemployment rates by county as compared with the state and national averages for December 1996.

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<b>Table 4 Unemployment Rates as of December 1996</b>	
<b>State of Ohio</b>	4.8%
<b>Adams County</b>	12.0%
<b>Scioto County</b>	10.1%
<b>Ross County</b>	6.0%
<b>Brown County</b>	5.8%
<b>Fayette County</b>	4.9%
<b>Clinton County</b>	3.7%
<b>Highland County</b>	7.3%
<b>United States</b>	5.0%

Four community contacts were conducted in conjunction with the examination. The community contacts included meetings with:

- a representative from one local chamber of commerce,
- a community development coordinator,
- a local government official, and
- an agricultural/community development extension agent.

The primary needs identified as a result of these contacts included financing affordable housing development, providing flexible mortgage loans, providing loans for building rehabilitation, and financing for women-owned businesses.

#### IV. INSTITUTION RATING

This institution's CRA performance is rated satisfactory.

The major factors and criteria contributing to this rating include:

- ! Good responsiveness to assessment area credit needs
- ! High percentage of loans inside assessment area
- ! Good penetration of assessment area geographies
- ! Good distribution of loans throughout the assessment area
- ! Excellent penetration of loans among retail customers of different income levels and business customers of different sizes
- ! Good record of serving the credit needs of economically disadvantaged areas
- ! High level of community development loans
- ! Good use of innovative and flexible lending practices
- ! Delivery systems accessible to essentially all of the assessment area
- ! Acceptable level of qualified community development investments
- ! Adequate responsiveness to credit and community economic development needs
- ! Absence of innovative and/or complex investments

Table 5 indicates the performance level of FTBSO with respect to the lending, investment, and service test.

<b>Table 5</b>			
<b>FIFTH THIRD BANK OF SOUTHERN OHIO PERFORMANCE TESTS</b>			
<b>PERFORMANCE LEVELS</b>	<b>LENDING TEST*</b>	<b>INVESTMENT TEST</b>	<b>SERVICE TEST</b>
<b>Outstanding</b>			
<b>High Satisfactory</b>	X		X

Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### Lending Test

#### *Lending Activity*

FTBSO originated more than 8,322 loans totaling more than \$140.6 million within its assessment area since the previous examination. The majority of the lending activity is related to home purchase and refinance, small business, small farm, home equity, and motor vehicles and reflects a high level of responsiveness to the assessment area's credit needs.

Table 6 shows the number and amount of the bank's lending inside its assessment area by loan product.

<b>Table 6</b>				
<b>Lending Within Assessment Area by Loan Product</b>				
<b>Loan Type</b>	<b>Number of Loans</b>	<b>% of Total Loans</b>	<b>Amount of Loans *</b>	<b>% of Total Loans</b>
Home Improvement	169	95%	\$1,607	95%
Home Purchase	527	89%	\$28,121	89%
Multi-Family	1	100%	\$280	100%
Home Refinance	449	94%	\$24,020	90%
Motor Vehicle	3,632	83%	\$28,667	77%
Other Unsecured	1,297	93%	\$3,819	91%

<b>Home Equity</b>	875	93%	\$21,159	92%
<b>Other Secured</b>	1,084	92%	\$11,171	90%
<b>Small Business</b>	159	89%	\$15,603	75%
<b>Small Farm</b>	129	95%	\$6,137	92%
<b>Total</b>	8,322	88%	\$140,584	85%

\* In thousands.

This table shows that a substantial majority of loans are within FTBSO's assessment area.

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### ***Geographic Distribution***

FTBSO originated loans in all of the 74 geographies within its assessment area. Therefore, FTBSO is considered to have excellent penetration of geographies within its assessment area.

Table 7 shows the number and amount of the bank's mortgage lending in each category of geography as a percentage of the number and amount of total mortgage lending. Home purchase, refinance, and home improvement loans are compared to the percentage of owner-occupied units in each geography, while multi-family loans are compared to the percentage of multi-family units in each geography.

<b>Table 7 Distribution of Mortgage Loans by Geography</b>				
<b>Type of Loan</b>	<b>Low- Income</b>	<b>Moderate- Income</b>	<b>Low- Income</b>	<b>Upper- Income</b>
<b>Home Purchase Loans *</b>	.5% .5%	49% 43%	50% 56%	.5% .5%
<b>Home Refinance Loans *</b>	1% 1%	54% 50%	45% 49%	0% 0%
<b>Home Improvement Loans *</b>	0% 0%	67% 68%	33% 32%	0% 0%
<b>Owner-Occupied</b>				

<b>Units **</b>	1%	45%	52%	2%
<b>Multi-Family Loans *</b>	0% 0%	100% 100%	0% 0%	0% 0%
<b>Multi-Family Units **</b>	9%	36%	51%	4%

\* Number and amount of mortgage loans as a percentage of total mortgage loans  
 \*\* Percentage of total units

This table shows that FTBSO's geographic distribution of mortgage lending approximates, and in some instances exceeds, the geographic distribution of owner-occupied and multi-family housing units in the assessment area.

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Table 8 shows the number and amount of the bank's small business and small farm lending in each category of geography as a percentage of the number and amount of total small business and small farm lending.

<b>Table 8 Distribution of Small Business and Small Farm Loans by Geography</b>				
<b>Type of Loan</b>	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>
<b>Small Business, Real Estate *</b>	4% 4%	84% 68%	12% 29%	0% 0%
<b>Small Business, Other *</b>	1% 3%	48% 48%	51% 49%	0% 0%
<b>Small Farm *</b>	0% 0%	27% 17%	73% 83%	0% 0%

\* Number and amount of small business and small farm loans as a percentage of total small business loans

This table shows a reasonable distribution of small business and small farm loans among low- and moderate-income geographies compared with middle- and upper-income geographies.

Table 9 shows the number and amount of the bank's consumer lending in each category of geography as a percentage of the number and amount of total consumer lending. Motor vehicle, other secured, and other unsecured loans are compared to the percentage of population in each geography, while home equity lines of credit are compared to the percentage of owner-occupied units in each geography.

<b>Table 9 Distribution of Consumer Loans by Geography</b>				
<b>Type of Loan</b>	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>
<b>Motor Vehicle Loans *</b>	.5% .5%	58% 53%	42% 47%	0% 0%
<b>Other Secured Loans *</b>	.5% .5%	59% 57%	41% 42%	0% 1%
<b>Other Unsecured Loans *</b>	.5% .5%	63% 57%	36% 42%	.5% .5%
<b>Population **</b>	1%	46%	52%	1%
<b>Home Equity Lines of Credit *</b>	0% 0%	50% 48%	48% 50%	2% 2%
<b>Owner-Occupied Units **</b>	1%	45%	52%	2%

\* Number and amount of consumer loans as a percentage of total consumer loans

\*\* Percentage of total population or owner-occupied units

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Table 9 shows that FTBSO's geographic distribution of consumer loans approximates or exceeds the geographic distribution of population and owner-occupied units in low- and moderate-income geographies.

FTBSO's geographic distribution of loans reflects good penetration throughout the assessment area.

***Borrower Distribution***

Table 10 shows the number and amount of the bank's mortgage and consumer lending in each category of borrower income as a percentage of the number and amount of total mortgage and consumer lending. Lending percentages are compared to the percentage of population in each income category.

<b>Table 10</b>
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<b>Distribution of Mortgage and Consumer Loans by Borrower Income</b>				
<b>Type of Loan</b>	<b>Low- Income</b>	<b>Moderate- Income</b>	<b>Middle- Income</b>	<b>Upper- Income</b>
<b>Home Purchase Loans *</b>	9% 3%	20% 13%	30% 28%	42% 56%
<b>Home Refinance Loans *</b>	7% 4%	22% 16%	32% 29%	39% 52%
<b>Home Improvement Loans *</b>	21% 10%	28% 16%	26% 30%	25% 43%
<b>Motor Vehicle Loans *</b>	37% 42%	37% 39%	14% 14%	12% 6%
<b>Other Secured Loans *</b>	19% 18%	33% 16%	19% 26%	30% 41%
<b>Other Unsecured Loans</b>	18% 8%	38% 27%	29% 33%	16% 32%
<b>Home Equity Lines of Credit *</b>	3% 1%	8% 4%	26% 22%	64% 73%
<b>Population **</b>	28%	20%	22%	30%

\* Number and amount of mortgage and consumer loans as a percentage of total mortgage and consumer loans

\*\* Percentage of total population

This table shows that FTBSO's borrower income distribution of mortgage and consumer lending is consistent with the income distribution in the assessment area. The level of loans in home purchase and home refinance categories made to low-income individuals appears low considering that 19.4% of the total population is below the poverty level.

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Lending to moderate-income borrowers exceeds the percentage of population in almost all loan categories. Unsecured lending to low-income borrowers is almost double the percentage of population. FTBSO's distribution of borrowers reflects excellent penetration among retail customers of different income levels.

Table 11 shows the number and amount of small business and small farm loans to businesses with less than \$1 million in annual revenues and the respective percentage of total small business and small farm loans.

<p><b>Table 11</b> <b>Small Business and Small Farm Loans With Revenues Less Than \$1</b></p>
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Million				
Type of Loan	Number of Loans	% of Total Loans	Amount of Loans*	% of Total Amount
Small Business	93	69%	\$8,204	60%
Small Farm	128	99%	\$6,077	99%

\* In thousands

This table shows that the majority of FTBSO's small business and small farm loans are to businesses and farms with less than \$1 million in annual revenues. FTBSO's distribution of borrowers reflects excellent penetration among business customers of different revenue sizes.

Table 12 shows the number and amount of small business and small farm loans by loan amount as a percentage of total small business and small farm loans.

Table 12 Small Business and Small Farm Loans by Loan Amount at Origination			
Type of Loan	Loan Amount ≤ \$100,000	Loan Amount > \$100,000 ≤ \$250,000	Loan Amount > \$250,000
Small Business	75%	15%	10%
	25%	25%	50%
Small Farm	89%	9%	2%
	49%	30%	21%

This table shows that FTBSO makes small business and small farm loans in varying amounts, with a concentration of loans less than \$100,000.

### ***Community Development Loans***

FTBSO has originated a relatively high level of community development loans. The bank originated \$34.2 million in community development loans since the previous examination. Table 13 shows the distribution of the number and amount of community development loans as a percentage by geography.



<b>Table 13 Distribution of Community Development Loans by Geography</b>		
<b>Type of Geography</b>	<b>Number of Loans (%)</b>	<b>Amount of Loans (%)</b>
<b>Low-Income</b>	0%	0%
<b>Moderate-Income</b>	79%	35%
<b>Middle-Income</b>	21%	65%
<b>Upper-Income</b>	0%	0%
<b>Multi-Geography*</b>	0%	0%

\* Community development loans benefiting more than one type of geography

This table shows that the majority of FTBSO's community development loans benefit moderate-income geographies in addition to benefiting low- and moderate-income individuals as evidenced in Table 10.

FTBSO's community development lending has resulted in more than 22 new or rehabilitated affordable housing units. The following is a partial listing of community development loans:

- ! Permanent and construction financing for the purpose of purchasing 20 lots and constructing 20 single-family houses which will have U.S. Department of Housing and Urban Development permanent financing.
- ! Construction and permanent financing of a medical office building for the Brown County Board of Alcohol, Drug Addiction, and Mental Health Services.
- ! Financing for the expansion and rehabilitation of a long-term care facility
- ! Financing for the purchase and renovation of a building to be used by the Highland County Social Services agency.
- ! Construction financing of a housing unit for Highland County senior citizens.

***Innovative/Flexible Lending Criteria***

FTBSO uses a number of innovative and flexible lending criteria to enhance its ability to meet the credit needs within its assessment area.

The following is a listing of these innovative and/or flexible lending programs. Several of these loan programs have been recently implemented by the bank and had not generated any loan volume as of the examination date. However, the lending volume of the established programs indicates the successful use of these programs.

- ! The Ohio Housing Finance Agency's Down payment Assistance Program provides low- and moderate- income home buyers with a \$2,500 loan for nine years at no interest. The loan proceeds are to be used for downpayment and closing costs. Funds for the 1996 program were depleted in mid-1996. The 1997 program is scheduled to begin in midsummer.
- ! Subsidized second mortgages originated in conjunction with the United States Department of Agriculture's Rural Housing Service under the Section 502 Single-Family Loan Program are designed to meet the needs of low-income rural borrowers who are unable to qualify for conventional mortgages. These loans were first offered in the fourth quarter of 1996. As of the examination date, four loans were originated totaling more than \$46,000.
- ! The Greenfield Buyer Assistance Program was designed to provide downpayment/closing cost assistance to residents of Greenfield, Ohio, whose income is at or below 80% of the area median income as determined by the Department of Housing and Urban Development. The program provides up to 5% of the mortgage amount as a downpayment and up to \$2,000 in closing costs. FTBSO implemented this program at the time of the examination (March 1997).
- ! Loans to low- to moderate-income individuals seeking to become business owners are offered by the bank in conjunction with the City of Chillicothe's First Capital Microenterprise Program. FTBSO originates these loans using favorable terms. The loans are then guaranteed by the First Capital Microenterprise Program. The bank implemented this program in April 1997.

- ! The bank originates government-assisted business loans in conjunction with the Small Business Administration's (SBA) guaranteed loan

programs, State of Ohio's Agriculture Linked Deposit loan program, State of Ohio's First Time Home Buyer's Program, and the Farmers Home Administration ("FmHA"). Since the previous examination, three SBA loans were originated totaling more than \$870,000, two Ohio Agriculture Linked Deposit loans were originated totaling more than \$200,000, two First Time Home Buyer loans were originated (amounts unknown), and two FmHA-guaranteed loans were originated totaling more than \$364,000.

### **Investment Test**

FTBSO makes investments and grants primarily through the Fifth Third Foundation and the Fifth Third Community Development Corporation (ACDC®), a subsidiary of Fifth Third Bancorp. CDC makes investments through low-income housing tax credits and small business venture capital equity funds.

The Foundation Office is a department of the Fifth Third Investment Advisors, a division of Fifth Third Bank of Cincinnati. The Foundation Office manages the Cincinnati bank's charitable trust established from profits of the bank for the purpose of providing grants and contributions to community and neighborhood, health and human services, educational, and cultural organizations.

Grants and contributions were made to organizations that provide money management education to young adults; homebuyer education and counseling; youth mentoring services; community services; job skills and training; affordable housing; and small business development and incubator services.

FTBSO has a satisfactory level of qualified community development investments and grants and has used innovative and complex investments to support community development initiatives.

### **Service Test**

#### ***Retail Banking Services***

FTBSO's retail banking and alternative delivery systems are accessible to essentially all geographies within the bank's assessment area. Table 14 shows the bank's distribution of branches and off-site ATMs by geography.

<b>Type of Geography</b>	<b># of Branches</b>	<b>% of Branches</b>	<b># of Off-Site ATMs</b>	<b>% of Off-Site ATMs</b>	<b>% of Total Population</b>	<b>% of Total Geographies</b>
<b>Low-Income</b>	0	0%	0	0%	1%	1%
<b>Moderate-Income</b>	8	53%	5	50%	46%	47%
<b>Middle-Income</b>	7	47%	5	50%	52%	50%
<b>Upper-Income</b>	0	0%	0	0%	1%	1%

This table shows that more than 53% of the bank's branches are located in low- and moderate-income geographies compared to a corresponding population of 47% and geographies of 48%. The maps in Appendix C show that additional branches located in middle- and upper-income geographies are conveniently located to low- and moderate-income geographies.

The table also shows that 50% of the bank's off-site ATMs are located in low- and moderate-income geographies, which compares favorably to the percentage of population and geographies. Additionally, the bank operates one mobile ATM which has been made available at community events including the Portsmouth River Days Festival, Brown County Fair, Clinton County Corn Festival, and the Brown County Tobacco Festival.

Stand-alone branches offer business hours Monday through Saturday. In addition, the bank operates a 24-hour, seven-day-a-week Customer Service Call Center and Jeanie Telephone Banking Center which allows customers to open deposit accounts, apply for loans, make account inquiries, and pay bills. Customers also have the opportunity to open deposit accounts and apply for loans through advertisements, direct mailings, and **Take-one** brochure displays. Business hours and services are reasonable and do not vary in ways that inconvenience certain portions of the assessment area.

Table 15 shows FTBSO's record of opening and closing branches since the previous examination.

<b>Table 15 Record of Opening and Closing Branches by Geography</b>		
<b>Type of Geography</b>	<b># of Branches Closed</b>	<b># of Branches Opened</b>
<b>Low-Income</b>	0	0
<b>Moderate-Income</b>	0	1
<b>Middle-Income</b>	0	3
<b>Upper-Income</b>	0	0

This table shows that the number of branches in low- and moderate-income geographies increased by one. The bank's record of opening branches has not adversely affected the accessibility of its delivery systems.

### ***Community Development Services***

FTBSO provides community development services including education and savings programs for school students, technical assistance and educational services to small businesses, and homeownership counseling and seminars. The following is a partial list of FTBSO's activities in providing these services:

- ! In conjunction with the Down Payment Assistance Program, FTBSO offers a comprehensive educational program to help potential low- and moderate-income homebuyers learn how to choose a home, how to prepare and apply for a mortgage, etc. The bank's mortgage loan officers work directly with the credit applicant to cover the educational material.
- ! A school savings program and seminars on lending, investments, and other banking services are provided by the branch manager of the Russellville Banking Center to the Eastern-Brown Local School District. This program benefits approximately 43 kindergarten students while the

seminars benefit approximately 120 students.

## Appendix A

### SCOPE OF THE EXAMINATION

Time Period Reviewed: 12/31/94 TO 04/01/97

Financial Institution: Fifth Third Bank of Southern Ohio, Hillsboro, Ohio

Products Reviewed:      Home Improvement  
                                 Home Purchase  
                                 Multi-Family  
                                 Home Refinance  
                                 Motor Vehicle  
                                 Other Unsecured  
                                 Home Equity  
                                 Other Secured  
                                 Small Business  
                                 Small Farm

Assessment Area: Fifth Third Bank of Southern Ohio has defined one assessment area which includes Adams, Brown, Clinton, Fayette, Highland, Ross, and Scioto Counties. The assessment area includes PMSA 1640 - Brown. The entire assessment area was reviewed and evaluated on-site.





