

PUBLIC DISCLOSURE

July 8, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Commercial and Savings Bank of Millersburg, Ohio
91 North Clay Street
Millersburg, Ohio

RSSD #189129

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

NOTE:

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

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INSTITUTION'S CRA RATING: This institution is rated Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors and criteria contribution to this rating include:

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs;
- A majority of loans and other lending-related activities are inside the assessment area;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income);
- The distribution of loans to businesses reflects a reasonable penetration among businesses of different revenue sizes given the demographics of the assessment area;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment areas;
- The community development activities demonstrate an adequate responsiveness to the community development needs of the assessment area, and;
- There were no CRA-related complaints filed against the bank since the previous CRA Evaluation.

The prior CRA evaluation conducted on August 22, 2016, resulted in a "Satisfactory" performance rating.

SCOPE OF EVALUATION

The Commercial Savings Bank of Millersburg, Ohio, Millersburg, Ohio (CSB) Community Reinvestment Act (CRA) performance is evaluated using the interagency intermediate small bank evaluation procedures under Regulation BB.

CSB's CRA Performance is evaluated based on lending data for the period January 1, 2016 through December 31, 2017 for Home Mortgage Disclosure Act (HMDA) loans and January 1, 2017 through December 31, 2017 for consumer, commercial, and small farm loans. Consumer loans are comprised of home equity, motor vehicle, other-secured, and other-unsecured loans. HMDA loans are comprised of purchase, refinance, and home-improvement loans.

Community development activities for the period August 22, 2016 to July 7, 2019 also were reviewed as part of this evaluation. Specifically, community development loans, investments, and services since the previous evaluation.

CSB's assessment area for CRA purposes is comprised of two assessment areas:

- Non-metropolitan Ohio – Full Scope Review
 - Coshocton County
 - Holmes County

- Tuscarawas County
- Wayne County
- Canton-Massillon, Ohio Metropolitan Statistical Area (MSA) #15940 – Limited Scope Review
 - Stark County

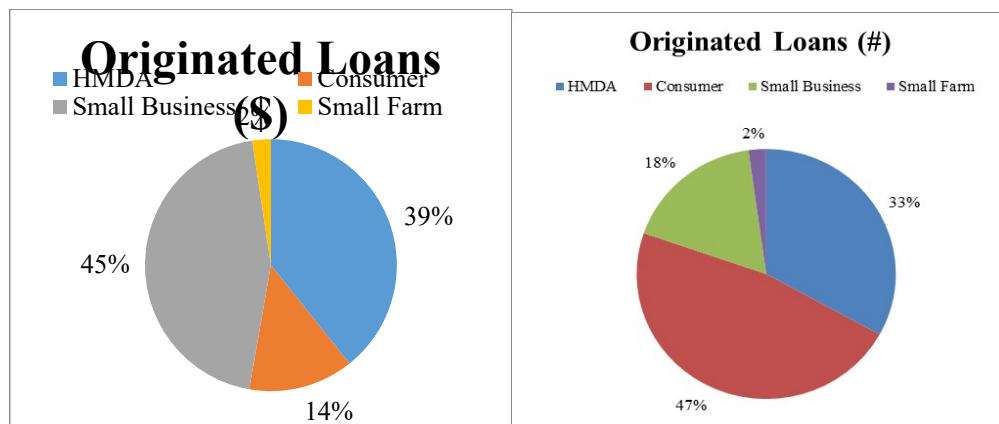
The evaluation scope for each area is based on the volume of lending and deposit share. CSB’s assessment area in the Non-metropolitan Ohio assessment area is given the greatest weight in this evaluation, as it contains the largest percentage of branches and originated the largest amount of loans by dollar and volume. CSB’s main office is in Non-metropolitan Ohio and, of the 15 offices in CSB’s delineated CRA footprint, 14 (93.3%) are in Non-metropolitan Ohio.

A detailed description of each assessment area is in subsequent sections of the performance evaluation.

One community contact interview was conducted to provide perspective on the credit needs of the assessment areas in which the bank operates. Details from this interview are presented in the full-scope assessment area of this evaluation.

The following table and charts illustrate the volume and distribution of loans originated in CSB’s assessment area during the evaluation period.

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
HMDA	676	95,789
Consumer	967	32,890
Small Business	358	109,407
Small Farm	45	5,803
Total	2,046	243,889



Based on total loan volume by number and the composition of the loan portfolio, consumer lending received the most weight, followed by HMDA, small business, and small farm lending. The bank originated too few construction and multi-family loans to perform a meaningful analysis; therefore,

those products are not discussed in this evaluation.

For the purpose of this evaluation, borrower distribution receives greater weight than geographic distribution given the limited number of low- and moderate-income tracts and zero distressed or underserved middle-income tracts.

The size and financial condition of the bank, lending opportunities in the assessment area, and competition with other institutions also were considered in the bank's performance context.

DESCRIPTION OF INSTITUTION

CSB is a state member bank headquartered in Millersburg, Ohio and is a wholly-owned subsidiary of CSB Bancorp, Inc. The bank operates primarily in Eastern Central Ohio. As of December 31, 2018, CSB reported total assets of \$731,579 million and total deposits of \$607,468 million. No changes have been made to CSB's assessment area since the previous evaluation.

CSB operates 14 full service branches and one limited service branch in its assessment areas (main office does not take deposits), 14 full-service automated teller machines (ATM), and four stand-alone ATMs. Of the 14 full service branch locations, only one is in the Canton-Massillon MSA. By tract category, branches and stand-alone ATMs are distributed as follows:

- Low-Income Tracts: None.
- Moderate-Income Tracts: Two branches with full service ATMs (New Philadelphia and Orrville, Ohio) and one stand-alone cash only ATM (Dover, Ohio).
- Middle-Income Tracts: Nine branches with full service ATMs and one limited service branch (Millersburg, Main Office). The nine branches with full service ATMs are located in: Berlin, Charm, Clinton Commons, Gnadenuhnten, Millersburg, Sugarcreek, Walnut Creek, Winesburg, and Wooster. In addition, there are three stand-alone cash only ATMs (two in Millersburg and one in Port Washington, Ohio).
- Upper-Income Tracts: Two branches with ATMs (one branch each in: Shreve and Wooster Milltown, Ohio).

Since the prior evaluation, one new branch was added in Orrville, Ohio. The new branch is at 119 West High Street and consolidated two branches in upper-income census tracts. The new branch is only 0.2 miles from the consolidated branch at 330 West High Street and 2.8 miles from the consolidated branch at 451 Wadsworth Road. In addition, a new banking center was officially opened in downtown Wooster, Ohio on June 4, 2019. The location of the new branch is 350 East Liberty Street and it is in a moderate-income tract. The opening of the new branch consolidated the original downtown Wooster branch that was in a middle-income tract. While the new Wooster Office opened prior to the evaluation period, it is not included in this analysis.

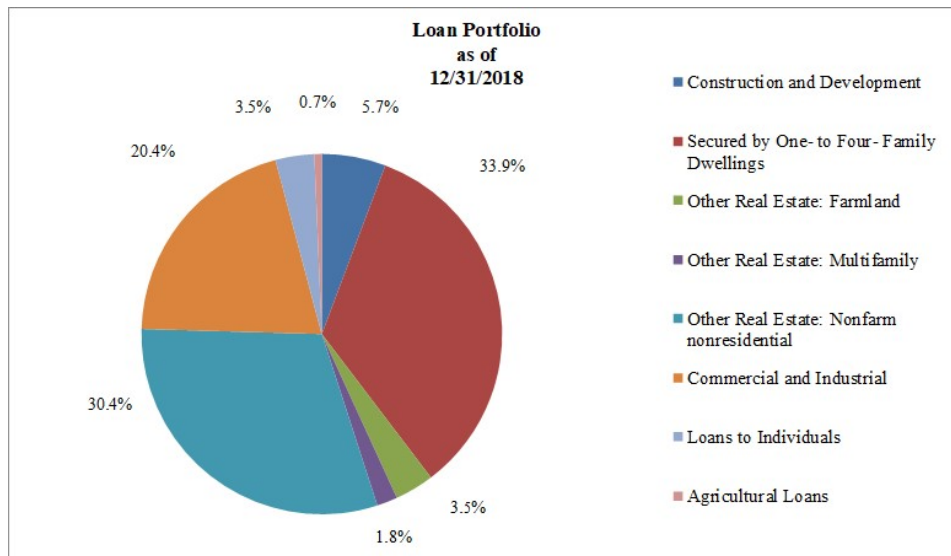
As of December 31, 2018, net loans and leases represent \$543.2 million or 74.2% of total assets. Net loans and leases increased 29.8% since the previous CRA evaluation due to organic growth. CSB is a full-service retail bank offering a variety of consumer, residential real estate, commercial, and a small number of agricultural loan products to fulfill the credit needs of the residents and businesses in the assessment areas. Consumer loan products include motor-vehicle and

recreational vehicle financing, other-secured, home equity, unsecured loans, credit cards, and mortgage loans. CSB also offers construction lending and commercial loan products including loans, lines of credit, business credit cards, and SBA loans.

The table/chart below illustrate CSB’s loan portfolio composition as of December 31, 2018.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2018		12/31/2017		12/31/2016	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	31,360	5.7%	22,646	4.4%	23,283	4.9%
Secured by One- to Four- Family Dwellings	185,757	33.9%	175,017	33.9%	164,334	34.7%
Other Real Estate: Farmland	19,253	3.5%	20,124	3.9%	19,758	4.2%
Other Real Estate: Multifamily	10,112	1.8%	10,758	2.1%	10,315	2.2%
Other Real Estate: Nonfarm nonresidential	166,671	30.4%	161,969	31.4%	142,033	30.0%
Commercial and Industrial	111,705	20.4%	105,881	20.5%	98,034	20.7%
Loans to Individuals	19,055	3.5%	16,353	3.2%	13,027	2.7%
Agricultural Loans	3,642	0.7%	3,773	0.7%	3,119	0.7%
Total	\$547,555	100.00%	\$516,521	100.00%	\$473,903	100.00%

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



There are no known legal or financial constraints preventing CSB from meeting the credit needs of the assessment area.

DESCRIPTION OF ASSESSMENT AREAS

The following summarizes CSB’s assessment areas evaluated as part of this evaluation:

- Non-metropolitan Ohio consisting of the entirety of Holmes and Tuscarawas counties and portions of Wayne and Coshocton counties.
- Canton-Massillon Ohio MSA #15940, consisting of the entirety of Stark County.

CSB’s assessment areas consist of 140 census tracts. Specifically, the assessment areas contain nine low-, 18 moderate-, 89 middle-, and 22 upper-income census tracts, and 2 unknown tracts. The main office and 14 branches are in Non-metropolitan Ohio. The Main office and 10 branches are in middle-income census tracts. Two branches are in moderate-income census tracts and two are in upper-income census tracts. None of the Non-metropolitan Ohio’s middle-income tracts are designated as distressed or underserved. CSB’s only branch in the Canton-Massillon Ohio MSA is in New Canton and is designated as middle-income tract.

Wayne County, with 116,038 people, has the largest population of all counties in Non-metropolitan Ohio, with Wooster as the county seat. Per the 2010 U.S. Census Bureau Report, the population in Wooster City was 26,119. The counties’ land use in Non-metropolitan Ohio is mainly forest, which could impact the level lending in the assessment area. Stark County, in the Canton-Massillon MSA, has the largest population of all counties in the assessment areas, with Canton City as the county seat. According to the 2010 U.S. Census Bureau Report, the population in Stark County was 372,542. The majority of Stark County is urban land use. Competition is high as several major regional banks operate in this area and CSB has only one full service branch in Stark County. The branch is in a middle-income tract in New Canton.

As of June 30, 2018, the Federal Deposit Insurance Corporation (FDIC) reported 27 insured financial institutions in Coshocton, Holmes, Stark, Tuscarawas, and Wayne counties. The FDIC’s market share report notes CSB ranked seventh with 5.1% of the market share of deposits.¹ The following table illustrates the deposit market share for the top 10 financial institutions in the counties.

#	Financial Institution	Deposit Market Share
1	The Huntington National Bank	28.6%
2	JPMorgan Chase Bank, National Association	12.2%
3	PNC Bank, National Association	9.0%
4	KeyBank National Association	5.7%
5	Citizens Bank, National Association	5.7%
6	First Commonwealth Bank	5.1%
7	The Commercial and Savings Bank of Millersburg, Ohio	5.1%
8	The Farmers National Bank of Canfield	4.2%
9	The Killbuck Savings Bank Company	3.4%
10	First Federal Community Bank, National Association	2.9%

¹ <https://www5.fdic.gov/sod>

Community Contact

A community contact interview was conducted with an affordable housing agency in the assessment area. The individual contacted has expertise in affordability housing and is familiar with the economic, social, and demographic characteristics and community development opportunities in the assessment area. Information obtained from this interview helped establish a context for the communities in which CSB operates and gather data on the bank's performance.

The community contact identified affordable housing and services tied to housing as a significant need in the community. While employment is at an all-time high in the assessment area, many jobs available do not provide enough income for residents to afford housing. In addition, there is a significant lack of affordable housing stock in the community due to the age of homes, causing significant barriers to lend as many are not up to safety codes. Further, landlords are less likely to rent properties at below-market rates given that the economy is doing well and available housing stock is low. More detailed information obtained from the community contact is in the "Description of the Institution's Operations" section of the full-scope assessment area evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

CSB's overall performance under the lending test is satisfactory. Lending performance in both assessment areas is reasonable.

Loan-to-Deposit Ratio

A financial institution's loan-to-deposit ratio (LTD) compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of the institution's lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing by the total number of quarters.

The following table illustrates CSB's quarterly LTD ratios since the previous evaluation, along with the average LTD ratios for three local peer banks for the same period. The customer peer LTD ratio is the combined aggregate LTD ratio for all three peer banks. This information is from the Deposit Market Share Report.²

² <https://www5.fdic.gov/sod>

COMMERCIAL & SVG BK	COMMERCIAL & SVG BK	KILLBUCK SVGS BK CO	WAYNE SVG CMNTY BK	FIRST FED CMNTY BK NA	CUSTOM PEER
As of Date	Bank Ratio	Peer 1 Ratio	Peer 2 Ratio	Peer 3 Ratio	Customer Peer Ratio
March 31, 2019	89.01	82.59	97.30	92.96	90.95
December 31, 2018	89.42	82.35	97.07	89.91	89.78
September 30, 2018	89.86	81.04	98.63	88.51	89.39
June 30, 2018	88.75	78.77	96.01	91.68	88.82
March 31, 2018	90.80	76.45	92.24	94.47	87.72
December 31, 2017	87.54	71.92	92.33	92.84	85.70
September 30, 2017	88.12	70.66	92.35	89.20	84.07
June 30, 2017	89.81	70.87	89.00	90.49	83.45
March 31, 2017	87.45	65.98	87.78	94.49	82.75
December 31, 2016	86.79	65.15	85.92	99.10	83.39
September 30, 2016	87.54	67.35	85.09	98.10	83.51
June 30, 2016	86.11	69.45	83.45	95.50	82.80
Deposit Ratio Average Since the	88.43	73.55	91.43	93.10	86.03

CSB’s average LTD ratio is 88.4% over the past 12 quarters. CSB’s LTD ratio is compared to three local peer banks: Killbuck Savings Bank Company in Killbuck, Ohio, Wayne Savings Community Bank in Wooster, Ohio and First Federal Community Bank in Dover, Ohio. CSB’s average LTD ratio is: slightly above the custom peer (86.0%), above Killbuck Savings Bank’s average LTD (73.5%), slightly below Wayne Savings LTD (91.4%), and below First Federal Community’s LTD (93.1%).

Lending in the Assessment Area

CSB’s consumer, HMDA, small business, and small farm lending was analyzed to determine the volume of lending inside and outside the assessment area. Of the total loans, 84.9% by volume and 83.0% by dollar amount were made inside the assessment area.

The following table shows the distribution of loans made inside and outside the assessment area.

Lending Inside and Outside the Assessment Area

Exhibit Commercial and Savings Bank

Loan Type - Description	Inside				Outside				Total	
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	\$(000s)
HE - Home Equity	264	95.3	21,812	95.9	13	4.7	943	4.1	277	22,755
MV - Motor Vehicle	285	92.3	3,615	93.6	24	7.7	248	6.4	310	3,863
OS - Other - Secured	132	51.6	2,614	45.5	124	48.4	3,129	54.5	256	5,743
OU - Other - Unsecured	118	95.2	511	96.5	6	4.8	19	3.5	124	530
Total Consumer related	800	82.7	28,652	86.8	167	17.3	4,339	13.2	967	32,990
CV - Home Purchase - Conventional	153	82.3	21,115	81.0	33	17.7	4,952	19.0	186	26,067
HI - Home Improvement	43	95.6	3,050	84.1	2	4.4	576	15.9	45	3,626
MF - Multi-Family Housing	2	100.0	372	100.0	0	0.0	0	0.0	2	372
RF - Refinancing	81	96.4	10,403	93.0	3	3.6	782	7.0	84	11,185
CV - Home Purchase - Conventional	146	80.2	22,148	76.2	36	19.8	6,925	23.8	182	29,073
FH - Home Purchase - FHA	2	100.0	208	100.0	0	0.0	0	0.0	2	208
HI - Home Improvement	42	85.7	2,864	65.1	7	14.3	1,534	34.9	49	4,398
MF - Multi-Family Housing	1	50.0	800	65.7	1	50.0	418	34.3	2	1,218
RF - Refinancing	108	87.1	15,860	80.7	16	12.9	3,782	19.3	124	19,642
Total HMDA related	578	85.5	76,820	80.2	98	14.5	18,969	19.8	676	95,789
SB - Small Business	316	88.3	92,811	84.8	42	11.7	16,596	15.2	358	109,407
Total Small Bus. related	316	88.3	92,811	84.8	42	11.7	16,596	15.2	358	109,407
SF - Small Farm	44	97.8	4,203	72.4	1	2.2	1,600	27.6	45	5,803
Total Small Farm related	44	97.8	4,203	72.4	1	2.2	1,600	27.6	45	5,803
TOTAL LOANS	1,738	84.9	202,385	83.0	308	15.1	41,803	17.0	2,046	243,889

Therefore, most of CSB’s loans by volume and dollar amount were made in the assessment area.

Borrower Distribution of Lending

CSB's lending to borrowers of different income levels and businesses of different revenue sizes is reasonable. Borrower distribution is reasonable in the Non-metropolitan Ohio and the Canton-Massillon Ohio MSA. Consumer lending, which receives the greatest weight, is reasonable as is HMDA lending. Small business lending and small farm lending is excellent. The respective analyses can be found in each assessment area discussion later in this evaluation.

Geographic Distribution of Lending

CSB's geographic distribution of lending is reasonable. Geographic distribution was weighted less than borrower distribution due to the lower number of low- and moderate-income tracts in the assessment areas. Geographic distribution is reasonable in the Non-metropolitan Ohio and the Canton-Massillon Ohio MSA. Consumer lending, which received the most weight, followed by HMDA lending, small business, and small farm lending were all rated reasonable. The respective analyses are included in each assessment area evaluation.

In addition to traditional bank products, CSB offers a number of programs to provide financing to a variety of borrowers, including:

- Home Possible Mortgages through Freddie Mac to low- and moderate-income potential borrowers. The program is designed to allow low- and moderate-income borrowers to gain access to mortgage credit by reducing the amount of down payment needed to obtain a secondary market loan. The loan program offers a 97.0% loan-to-value (LTV) for one unit and 95% LTV for 2-4 units and it is limited to primary residences and purchases or no-cash-out refinances. The loan program offers: fixed rates, reduced mortgage insurance coverage levels, flexible closing cost funding options, and no required reserves.
- Small Business Administration (SBA) 7(a) and express loan programs - These are primary programs for providing financial assistance to small businesses. In addition, the SBA Express program features an accelerated turnaround time for SBA review. Under this program the SBA will respond to an application within 36 hours.
- USDA Rural Business and Industry loan programs - This is a loan guarantee program designed to assist credit-worthy rural businesses obtain needed credit for most any legal business purpose. The intent of the program is to save and create jobs in rural America.

Response to Consumer Complaints

CSB has not received any CRA-related complaints since the prior evaluation.

Community Development Test

Community Development Loans

During this evaluation period, CSB originated nine community development loans totaling \$7,836,352 which is an excellent level of community development loans. Six loans were

originated in the Non-metropolitan Ohio assessment area totaling \$4,177,601.50 and three in the Canton-Massillon Ohio MSA totaling \$3,658,750.00. Details of the originated loans can be found in each of the assessment area's analysis.

Qualified Investments

CSB did not make any community development investments in the Non-metropolitan Ohio assessment area and the Canton-Massillon Ohio MSA. However, various donations were made throughout the assessment areas with 54 made in Non-Metropolitan Ohio totaling \$42,493 and six in the Canton-Massillon Ohio MSA for \$1,650. In addition, CSB had one investment that was previously qualified during the August 22, 2016 evaluation, with a book value of \$285,000. Overall, community development investments are poor.

Community Development Services

Overall, CSB provides an adequate level of community development services in the assessment areas. A variety of employees served at 20 different organizations for a total of 651 hours. Services in Non-metropolitan Ohio totaled 614 services hours to 11 agencies that provided affordable housing assistance and community services. Services in the Canton-Massillon Ohio MSA totaled 37 hours to two agencies that provided affordable housing assistance and community services. CSB's officers, directors, and staff provided their financial expertise to the community by engaging in activities that promoted or facilitated affordable housing and services for low- and moderate-income individuals.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discrimination or other illegal credit practices inconsistent with helping to meet community credit needs were identified.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE
NON-METROPOLITAN OHIO ASSESSMENT AREA**
(Full-scope Evaluation)

The Non-metropolitan Ohio assessment area includes the entireties of Holmes and Tuscarawas counties and portions of Coshocton and Wayne counties. The assessment area was changed slightly in 2017 to include two additional census tracts in Wayne County; however, the addition of these tracts does not have a substantial impact on the assessment area. The assessment area consist of 54 census tracts. The lending evaluation for 2016 is based on income information from the 2010 U.S Census Bureau, resulting in a different composition of census tracts in 2016 compared to 2017. The 2016 assessment area was composed of 52 census tracts, which included one low- (1.9%), eight moderate- (15.4%), 37 middle- (71.2%), and six upper-income census tracts. In 2017, the assessment area is comprised of 54 census tracts of which zero are low- (0.0%), seven are moderate- (13.0%), 37 middle- (68.5%), upper- 13.8% and one unknown-income tract. The 2017 assessment area is based on income from the 2015 U.S. Census Bureau's American Community Survey (ACS) which impacted the tract designations.

A majority of the banking centers (14 of 15) are in Non-metropolitan Ohio. None of the middle-income census tracts are listed on the Federal Financial Institutions Examinations Council's (FFIEC) list of distressed or underserved non-metropolitan middle-income geographies, as defined by the Community Development Financial Institutions for 2016 or 2017.

Coshocton County is directly south of Cleveland, Ohio. The county is a mixture of cropland (11.0%), forest areas (58.4%), and pasture (21.0%). Urban areas make up only a small percentage of land use at 6.6%. Coshocton is the largest city and the county seat. The county had a population of 36,901 according to the 2010 U.S. Census.

Holmes County is north of Coshocton County and south of Cleveland, Ohio. The county is a mixture of pasture (38.6%), forest areas (39.9%), and cropland (12.8%). Urban areas are limited to 6.7% of the land use in the county. The county seat is Millersburg Village and the largest city in Holmes County is Salt Creek Township. Holmes County had a population of 42,366 according to the 2010 U.S. Census. Holmes County also has a large Amish population with 227 church districts and 30,000 individuals. According to Amish America,³ Holmes County also contains the most diverse group of Amish in Ohio with 11 distinct affiliations. The Amish primarily live in the eastern half of Holmes county and comprise about half of the County's population. The Amish in Holmes County work in a variety of occupations. Farming has been in decline due to population growth and land scarcity. Thus, only a minority of Amish remain in dairy farming and a small percentage in crop cultivation. Instead, small business is popular among Amish in the Holmes County settlements, with many Amish furniture shops, manufacturers, and homebuilders operating out of the settlement. As a result of the large Amish population, the tourist industry is also significant in Holmes County.

Tuscarawas County is east of Holmes County and south of Cleveland, Ohio. The county is a mix of forest (53.2%), pasture (22.9%), cropland (8.3%), and urban areas (10.7%). The county seat is

³ <http://amishamerica.com/ohio-amish/>

New Philadelphia, which is the largest city in the county. According to the 2010 U.S. Census Bureau, the population of the county was 92,582. Similar to Holmes County, Tuscarawas is home to a significant number of Amish and is part of the Holmes County settlement which includes the counties of Holmes, Wayne, Tuscarawas, Coshocton, Stark, and Ashtabula. According to Amish America,⁴ the Holmes County settlement is an Amish community that is considered one of the most diverse. The settlement is composed of about 12 Amish affiliations ranging from the most conservative to the most progressive.

Wayne County is south of Cleveland Ohio and north of Coshocton, Tuscarawas, and Holmes counties. The county is a mix of cropland (39.5%), pasture (27.6%), forest (17.8%), and a small portion of urban areas (11.8%). Wooster is the county seat and largest city in the county. According to the 2010 U.S. Census Bureau, the population of Wayne County is 114,520 making it the largest county in this assessment area. Wayne County is also home to Wooster College, a private liberal arts college that has a total student population of 1,980.⁵ While Wooster College is in a census tract designated as “unknown,” the two census tracts directly south of Wooster College are moderate-income tracts that may impact the bank’s ability to originate HMDA loans due to the student population. Wayne County is also part of the Holmes County Amish Settlement.

According to the June 30, 2018 FDIC Market Share Report,⁶ CSB had 12.1% of the deposits and is ranked third of 21 institutions in this market. The FDIC market share report below illustrates the market share held by the top ten financial institutions in Non-Metropolitan Ohio.

#	Financial Institution	Deposit Market Share
1	PNC Bank, National Association	14.5%
2	The Huntington National Bank	12.8%
3	The Commercial and Savings Bank of Millersburg, Ohio	12.1%
4	JPMorgan Chase Bank, National Association	8.8%
5	The Farmers National Bank of Canfield	8.2%
6	The Killbuck Savings Bank Company	8.2%
7	First Federal Community Bank, National Association	6.9%
8	Wayne Savings Community Bank	5.8%
9	The First National Bank of Dennison	4.3%
10	The Park National Bank	3.2%

One community contact interview was conducted to provide information on the credit needs of the local community and context to the demographic and economic characteristics of the assessment area. The contact, representing an affordable housing agency, stated the assessment area is significantly lacking in affordable housing for low- and moderate-income individuals. In addition, a significant portion of the individuals seeking affordable housing are the aged population that no longer have the income to afford market rates. The housing stock of the assessment area is not conducive to rehabilitation as the housing available is older presenting significant challenges to

4 www.amishamerica.com/12-largest-amish-communities-2017

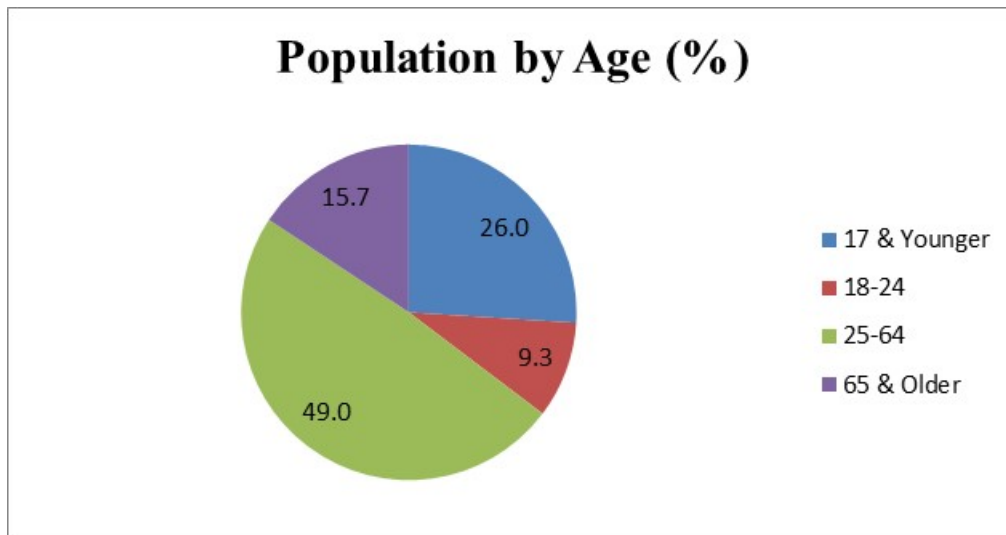
5 <https://www.collegedata.com/college/College-of-Wooster>

6 <https://www.fdic.gov/sod>

the bank to lend on the property due to safety concerns. In addition, there is not an appetite for landlords to offer renters an affordable rate, as the economy is doing well in the assessment area and landlords are able to rent housing at market rates. The community contact stated that there is a significant need for banks to develop a loan product that takes into account the challenges low- and moderate-income individuals when attempting to purchase a home. The community contact stated that they are working with CSB to begin offering a loan product to potential low- and moderate-income households that is subsidized by the community contact’s organization. It is noted that no loans have been originated; however, the community contact stated that the expectation is that there will be originations soon, as the product is fairly new. Lastly, the contact noted that if more banks in the area begin developing these types of loan products this would significantly reduce the need for affordable housing.

Population Characteristics

According to data from the Census Bureau’s 2015 ACS, the total population in the assessment area was 230,061. Approximately 10.8% of the assessment area’s population resides in moderate-income tracts, 74.9% in middle-income tracts, 13.8% reside in upper-income tracts, and 0.5% in an unknown income tract. There are no low-income tracts in the assessment area. As shown in the chart below, 74.0% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 58.3% of the population is between the ages of 18 and 64 and more likely to have credit needs.



The population in Non-metropolitan Ohio is decreasing overall, as depicted in the following table which shows the population change is from 2016 to 2017.

County	2016 Population	2017 Population	Population Percent Change
Coshocton	36,644	36,544	-0.3%
Holmes	43,832	43,957	0.3%
Tuscarawas	92,485	92,297	-0.2%
Wayne	116,422	116,038	-0.3%
Total	289,383	288,836	

Income Characteristics

The 2010 median family income (\$53,513) in the assessment area was below the median family income of the State of Ohio (\$59,680). As shown below, the assessment area median family income of \$53,513 increased to \$61,000 in 2016 and slightly decreased to \$60,800 in 2017 remaining above the 2010 median family income.

**Borrower Income Levels
 Ohio State Nonmetropolitan**

HUD Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2016	\$61,000	0	-	\$30,499	\$30,500	-	\$48,799	\$48,800	-	\$73,199	\$73,200	-	& above
2017	\$60,800	0	-	\$30,399	\$30,400	-	\$48,639	\$48,640	-	\$72,959	\$72,960	-	& above

Between 2016 and 2017, poverty rates in the assessment area increased in all counties except Holmes County. Coshocton County experienced the greatest increase. Coshocton’s rate was above the state and nation. The remaining counties were below state and national poverty rates.

County	2016 Poverty Rate	2017 Poverty Rate	Change
Coshocton	12.70%	15.70%	23.62%
Holmes	11.70%	9.00%	-23.08%
Tuscarawas	12.70%	12.80%	0.79%
Wayne	11.90%	12.90%	8.40%
Ohio	14.50%	13.90%	-4.14%
United States	14.00%	13.40%	-4.29%

According to the Census Bureau’s 2015 ACS, 13.2% of the 83,850 households in the assessment area are below the poverty level and 38.9% of renters have rent costs greater than 30.0% of their monthly income. Of the families that are households, 10.5% are below the poverty level. Low- and moderate-income families represent 36.5% of all families in the assessment area, while low- and moderate-income households represent 36.6% of all households in this assessment area.

Housing Characteristics

According to the Census Bureau's 2015 ACS, there are 90,588 housing units and 59,644 families in the assessment area. From an income perspective, 12.4% of the housing units and 9.6% of families are in the assessment area's moderate-income tracts. Also, 46.6% of the housing units in moderate-income tracts are owner-occupied and over half of the housing units are either rental (43.6%) or vacant (9.9%). In addition, 11.0% of housing units are multi-family with five or more units. Therefore, based on the limited number of moderate-income tracts, families and housing units and the percentage of rental/vacant/multi-family units, there may be limited credit-related opportunities for CSB to originate home mortgage loans.

The Census Bureau's 2015 ACS shows the median age of housing stock was 49 years old, and 29.0% of the assessment area's 90,588 housing units are at least 69 years old (built before 1950). This indicates there may be opportunities to make home improvement loans; however, based on information from the community contact interview, home improvement loans may be difficult to originate due to safety issues of the older housing. In addition, the median housing value in the assessment area was \$127,785 with an affordability ratio of 37.5%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a loan. Further, based on the 2017 median family income for the Non-metropolitan Ohio assessment area (\$57,785), approximately 34.4% of the homes valued up to \$87,000 would be considered affordable for low-income individuals and 61.9% valued up to \$139,000 would be considered affordable for moderate-income individuals.

According to Sperling's Best Places, the 2018 median home cost in Coshocton County was \$90,900 and appreciation of 6.6% over the past ten years.⁷ The 2018 median home cost in Holmes County was \$99,400, in the past 10 years housing appreciated 5.6%. The 2018 median home cost in Tuscarawas County was \$111,300, similar to Holmes County the home appreciation in the past 10 years was 5.7%. Wayne County's 2018 median home cost was \$148,200 and housing over the past 10 years appreciated 6.0%. The following table highlights foreclosure ratios⁸ in the Non-metropolitan Ohio assessment area. Holmes, Tuscarawas, and Wayne County all have foreclosure filings above the State of Ohio and the Nation. Only Coshocton County is below the State of Ohio and the Nation's foreclosure rate.

⁷ Sperling's Best Places, www.bestplaces.net

⁸ www.realtytrac.com

Geography Name	Foreclosed Properties in (June, 2019)	Ratio of Properties Receiving Foreclosure Filings in (June, 2019)
Coshocton County	4	1:3169
Holmes County	1	1:1235
Tuscarawas County	14	1:1670
Wayne County	34	1:1364
Ohio	2,500	1:2051
United States	50,000	1:2814

According to Census Bureau’s 2015 ACS, 38.2% of renters in the assessment area have rent costs greater than \$700 a month and nearly 38.9% of renters are considered to be cost burdened as they have rent costs greater than 30.0% of their monthly income. Higher rental costs may make it more difficult for potential first-time home buyers to save enough money to make a large enough down payment in the rising interest rate environment. In addition, the community contact stated that the need for affordable housing loan products is great, given the significant challenges of the age and disrepair of affordable housing stock.

Labor, Employment, and Economic Characteristics

The following table indicates the primary employment sectors (by number of persons employed in the county) and major employers for each of the counties in the assessment area.⁹

County	Primary Employment Sectors	Major Employers
Coshocton	Manufacturing; Trade, Transportation, & Utilities; Education & Health Services	AK Steel Holding Corp; American Electric Power Co; Amin & Co; Coshocton City Schools; Coshocton Regional Medical Center; Kraft Heinz Co; McWane Corp/Clow Water Systems; Riverview Local Schools; Wal-Mart Stores Inc
Holmes	Manufacturing; Construction; Trade, Transportation & Utilities; Education & Health Services; Leisure & Hospitality	Case Foods Inc; Centor Inc; East Holmes Local Schools; West Holmes Local Schools; International Automotive Components; Overhead Door/Wayne-Dalton; Pomerene Hospital; Sperry & Rice Mfg Co LLC; Weaver Leather Goods Inc
Tuscarawas	Manufacturing; Construction; Trade, Transportation & Utilities; Professional & Business Services; Education & Health Services; Leisure & Hospitality.	Allied Machine & Engineering; Dover Chemical Corporation; Dover City Schools; Gradall Industries; Lauren Manufacturing; Marlite, Inc; New Philadelphia City Schools; nuCamp RV; Union Hospital; Wal-Mart Stores Inc; Zimmer Orthopedic
Wayne	Manufacturing; Trade, Transportation, & Utilities; Leisure & Hospitality; Education & Health Services; Local Government	Artiflex Manufacturing; Frito-Lay Inc; Gerber Poultry; JM Smucker Co; Wooster Community Hospital; College of Wooster; Wooster City Schools; Schaeffler Transmission; State of Ohio; Will-Burt Co; Wooster Brush Co.

Tourism is also a large part of the economy in the assessment area. Holmes County has a large Amish population; of the county’s 40,000 people, about 18,000 are Amish. Millions of visitors explore Amish County yearly bringing in funds to the local economy via the service industry. However, jobs created from tourism are not typically higher paying and, thus, the tourism industry would not necessarily allow for much upward movement in the economy.

The following table illustrates land use in each county in the assessment area.¹⁰

9 http://development.ohio.gov/reports/reports_countytrends_map.htm

10 http://development.ohio.gov/reports/reports_countytrends_map.htm

County	Urban	Cropland	Pasture	Forest	Open Water	Bare Mines	Wetlands
Coshocton	6.60%	11.00%	21.00%	58.40%	1.00%	0.20%	0.90%
Holmes	6.70%	12.80%	38.60%	40.00%	0.40%	0.10%	1.10%
Tuscarawas	10.70%	8.30%	22.90%	53.20%	10.00%	0.40%	1.20%
Wayne	11.80%	39.50%	27.60%	17.80%	0.60%	0.10%	2.30%

Three of the four counties in the assessment area are mainly forest, followed by cropland and pasture. Wayne County is the exception with cropland being the predominant land use. All four counties indicate that less than 12.0% of the land is urban. The limited amount of urban land may provide fewer opportunities for CSB to originate all types of loans in the assessment area.

The table below depicts average unemployment rates for 2016 and 2017 in the assessment area.

Unemployment Rates
The Commercial and Savings Bank of Millersburg
Assessment Area: Nonmetropolitan Ohio

Area	Years - Annualized	
	2016	2017
Coshocton Co.	7.0	6.3
Holmes Co.	3.6	3.2
Tuscarawas Co.	5.4	4.7
Wayne Co.	4.1	3.8
Ohio	5.0	4.5
National	4.5	3.9

Not Seasonally Adjusted

Data extracted on February 21, 2019

The unemployment rates for all counties in the assessment area decreased between 2016 and 2017. Unemployment rates for the counties of Wayne and Holmes were below the State of Ohio and the Nation. Unemployment rates in Coshocton and Tuscarawas counties were above the State and Nation. While unemployment rates are decreasing in the assessment area, the community contact explained that wages from the employment are not conducive to meeting the income needs of the assessment area. Thus, CSB may find it difficult generating consumer and HMDA loans if the wages paid do not align with the cost of housing in the assessment area.

The following tables illustrate the demographics in the Non-metropolitan Ohio assessment area.

Combined Demographics Report

Assessment Area(s): Non Metropolitan Ohio 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0	0	0	0	0	10,208	17.1	
Moderate-income	7	13	5,729	9.6	1,080	18.9	11,591	19.4	
Middle-income	37	68.5	44,661	74.9	4,640	10.4	13,361	22.4	
Upper-income	9	16.7	9,241	15.5	550	6	24,484	41.1	
Unknown-income	1	1.9	13	0	0	0	0	0	
Total Assessment Area	54	100.0	59,644	100.0	6,270	10.5	59,644	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	11,249	5,240	8.7	46.6	4,899	43.6	1,110	9.9	
Middle-income	65,925	44,935	74.9	68.2	16,211	24.6	4,779	7.2	
Upper-income	13,324	9,823	16.4	73.7	2,674	20.1	827	6.2	
Unknown-income	90	30	0	33.3	38	42.2	22	24.4	
Total Assessment Area	90,588	60,028	100.0	66.3	23,822	26.3	6,738	7.4	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	1,028	12.2	868	11.9	148	15.4	12	7.7	
Middle-income	6,322	75	5,464	74.7	729	75.9	129	83.2	
Upper-income	1,076	12.8	982	13.4	80	8.3	14	9	
Unknown-income	5	0.1	2	0	3	0.3	0	0	
Total Assessment Area	8,431	100.0	7,316	100.0	960	100.0	155	100.0	
Percentage of Total Businesses:			86.8		11.4		1.8		
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	13	1.9	13	1.9	0	0	0	0	
Middle-income	552	81.3	543	81.3	9	81.8	0	0	
Upper-income	114	16.8	112	16.8	2	18.2	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	679	100.0	668	100.0	11	100.0	0	.0	
Percentage of Total Farms:			98.4		1.6		.0		

Combined Demographics Report

Assessment Area(s): Non Metropolitan Ohio 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	1.9	49	0.1	30	61.2	9,876	17.4
Moderate-income	8	15.4	7,041	12.4	1,192	16.9	10,565	18.6
Middle-income	37	71.2	43,346	76.3	3,721	8.6	13,122	23.1
Upper-income	6	11.5	6,401	11.3	330	5.2	23,274	40.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	52	100.0	56,837	100.0	5,273	9.3	56,837	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	99	19	0	19.2	50	50.5	30	30.3
Moderate-income	11,945	6,787	11.3	56.8	3,686	30.9	1,472	12.3
Middle-income	65,527	46,251	76.9	70.6	13,336	20.4	5,940	9.1
Upper-income	10,715	7,102	11.8	66.3	2,909	27.1	704	6.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	88,286	60,159	100.0	68.1	19,981	22.6	8,146	9.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5	0.1	2	0	3	0.3	0	0
Moderate-income	1,177	13.1	998	12.7	161	17.2	18	11.6
Middle-income	6,609	73.8	5,818	73.9	662	70.7	129	83.2
Upper-income	1,170	13.1	1,051	13.4	111	11.8	8	5.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	8,961	100.0	7,869	100.0	937	100.0	155	100.0
Percentage of Total Businesses:			87.8		10.5		1.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	40	5.6	40	5.7	0	0	0	0
Middle-income	629	88.1	620	88.1	9	90	0	0
Upper-income	45	6.3	44	6.3	1	10	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	714	100.0	704	100.0	10	100.0	0	.0
Percentage of Total Farms:			98.6		1.4		.0	

2016 FFIEC Census Data and 2016 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN OHIO

Lending Test

CSB's performance under the lending test in this assessment area is reasonable. CSB has reasonable distribution among borrowers of different income levels and the distribution to businesses and farms of different revenue sizes is excellent. There are moderate levels of lending gaps and a reasonable geographic distribution of loans. Therefore, CSB exhibits a reasonable record of serving the credit needs of low- and moderate-income individuals or businesses and small farms with gross annual revenues of \$1 million or less.

Borrower distribution received greater weight than geographic distribution based on the lower percentage of low and moderate-income geographies in the assessment area. Consumer loans were given the greatest weight in the evaluation (home equity, motor vehicle, other secured, and other unsecured) based on the overall volume of loans, followed by residential mortgage lending (home purchase, refinance, and home improvement), small business, and small farm lending. There were not enough consumer loans, small business loans, or small farm loans in 2016 to conduct a meaningful analysis, therefore, only 2017 data was evaluated for these products. In addition, CSB's residential lending performance was compared to 2016 and 2017 aggregate performance of all lenders required to report HMDA data in the respective assessment areas. Details of the consumer, residential mortgage, small business, and small farm lending and information regarding lending by peers is in Appendix B.

Borrower Distribution of Lending

CSB's overall distribution for borrowers of different income levels is reasonable and the borrower distribution of businesses and farms of different sizes is excellent. Borrower distribution is reasonable for consumer and HMDA and excellent for small business and small farm lending.

Consumer Lending

There were 730 consumer loans originated in the evaluation period (2017) of which 671 had borrower income. Of those loans, 13.0% were to low-, 34.4% to moderate-, 23.2% to middle- and 29.4% to upper-income borrowers. Consumer lending was compared to the income levels of households in the assessment area (proxy) for motor vehicle, other-secured, and other-unsecured loans and to income levels of families in the assessment area (proxy) for home equity loans.

Home Equity Lending

CSB's home equity lending to low-income borrowers was 5.6%, which was well below the proxy of 17.1%. Within the assessment area, the median family income is \$57,785; however, 39.7% of the housing stock is priced at \$150,000 and limits the available housing stock that would be affordable for low-income borrowers given that only 34.4% would be affordable based on the U.S. Census Bureau's 2010 median family income of \$53,513. In addition, of the 90,588 housing units in the assessment area, 26.3% are rental and 7.4% are vacant, thus limiting the ability to originate

home equity loans. Lending to moderate-income borrowers was 28.2%, which was above the proxy of 19.4%. CSB's lending to borrowers of middle-income was 25.8% or slightly above the proxy at 22.4%. Lastly, lending to upper-income borrowers of 36.3% was below the proxy of 41.1%.

CSB's home equity lending to low-income borrowers was lower than the percentage of families (proxy), but exceeded proxy for moderate-income borrowers and is reasonable.

Motor Vehicle Lending

CSB's motor vehicle lending to low-income borrowers was 15.5%, which was below the proxy of 20.9%. Within the assessment area, 20.9% of households are low-income and 13.2% are below poverty, which could limit the bank's ability to lend to low-income borrowers. In addition, 38.9% of renters in the assessment area have rent costs greater than 30% of their income, which could limit their ability to afford a motor vehicle loan. Lending to moderate-income borrowers of 35.4% significantly exceeded the proxy of 15.7%. Lending to borrowers of middle-income was 18.4% or slightly below the proxy of 19.3%. Lastly, lending to upper-income borrowers at 26.0% was below the proxy of 44.1%.

CSB's motor vehicle lending to low-income borrowers was below the percentage of households (proxy), but significantly exceeded the proxy for moderate-income borrowers and is reasonable.

Other-Secured Lending

CSB's other-secured lending to low-income borrowers was 10.5% or below the proxy. Lending to moderate-income borrowers at 31.6% significantly exceeded the proxy. Other-secured loans are usually smaller dollar loans that can have a significant impact on low- and moderate-income borrowers and may prevent them from seeking alternative lenders that may not have loan terms consistent with fair practices. Lending to middle-income borrowers at 20.0% was slightly above the proxy. Lending to upper-income borrowers was 18.9%, which was well below the proxy.

CSB's other-secured lending to low-income borrowers was below the percentage of households (proxy), but significantly exceeded the proxy for moderate-income borrowers and is reasonable.

Other-Unsecured Lending

CSB's other-unsecured lending to low-income borrowers at 18.2% was slightly below the proxy of 20.9%, whereas lending to moderate-income borrowers at 30.0% significantly exceeded the proxy. Unsecured loans are typically difficult to originate but can be extremely beneficial especially to low- and moderate-income borrowers who may not have access to substantial assets to secure a loan. Lending to middle-income borrowers at 20.0% was slightly above the proxy and lending to upper-income borrowers at 15.5% was well below the proxy.

CSB's other-unsecured lending to low-income borrowers was slightly lower than the percentage of households (proxy), but significantly exceeded the proxy for moderate-income borrowers and is excellent.

Consumer lending overall is reasonable.

HMDA Lending

Of the 507 HMDA loans made in the assessment area during the evaluation period (2016 and 2017), 471 had borrower income. Of the loans with income, 5.3% were to low-, 28.2% to moderate-, 28.7% to middle-, and 37.8% to upper-income borrowers. CSB's performance was compared to the income of families in the assessment area (proxy). To evaluate CSB's HMDA lending, loan activity was further analyzed by understanding the performance context of the assessment area. In the assessment area, 17.1% of families are low-income and 10.5% are below poverty. This may substantially impact the ability to originate loans to low-income borrowers. In addition, the average age of housing stock in the assessment area is 49 years, with 29.5% built before 1950. The aged housing stock, according to the community contact, may impede banks from making HMDA loans as the house may be unsafe and need large funds to bring the properties to code. Further, 26.3% of housing units in the assessment area are rentals, 7.4% are vacant, and 5.3% are multi-family, which further limits CSB's ability to originate HMDA loans.

Home Purchase Lending

In 2016, CSB made 135 home purchase loans, of which 5.2% were to low-income borrowers or well below proxy of 17.4% and slightly below the aggregate of 6.1%. Within the assessment area, 65.7% of the available housing units are valued at \$100,000 or greater and 38.0% of renters have a rent cost greater than 30.0% of their income. These two factors can severely limit the bank's ability to lend, as a higher rent costs may impact a person's ability to save for a home purchase and only 34.3% of the available housing is below \$100,000. Further, of the available housing stock, only 68.1% are owner-occupied units. Lending to moderate-income borrowers was 26.7%, which exceeded the proxy and aggregate at, 18.6% and 21.9%, respectively. Lending to middle-income borrowers of 26.7% exceeded the proxy of 23.1% and the aggregate at 25.3%. Lastly, lending to upper-income borrowers of 37.0% was slightly below the proxy of 40.9% and exceeded the aggregate of 31.0%.

In 2017, CSB made 129 home purchase loans of which 3.9% were made to low-income borrowers which was significantly below the proxy of 17.1%, and slightly below the aggregate of 4.4%. Lending to moderate-income borrowers was 28.7% which was above the proxy of 19.4% and the aggregate of 22.0%. Lending to middle-income borrowers was 31.0% which is above the proxy of 22.4% and aggregate of 23.6%. Lastly, lending to upper-income borrowers was 34.1% which was slightly below the proxy of 41.1%, but slightly above the aggregate of 31.3%.

CSB's distribution of borrowers at different income levels is reasonable for home purchase loans.

Refinance Lending

In 2016, CSB made 91 refinance loans of which 3.3% were made to low-income borrowers which was significantly below the proxy and below the aggregate at 5.6%. The median family income is \$53,513 and the median housing value for the assessment area is \$126,373 with an affordability

ratio of 35.0%. These factors can significantly the bank's ability to originate refinance loans to low-income borrowers within the assessment area. Lending to moderate-income borrowers at 22.0% is slightly above the proxy of 18.6% and above the aggregate of 16.0%. Lending to middle-income borrowers was 20.0% which was slightly below the proxy of 23.1% and the aggregate of 22.6%. Lastly, lending to upper-income borrowers was 38.5%, which was slightly below the proxy and slightly above the aggregate of 37.6%.

In 2017, CSB originated 73 refinance loans of which 2.7% were made to low-income borrowers which was significantly below the proxy of 17.1%, and well below the aggregate of 6.7%. Lending to moderate-income borrowers was 28.8% which was above the proxy of 19.4% and significantly above the aggregate of 16.0%. Lending to middle-income borrowers was 21.9% was slightly below the proxy of 22.4% and significantly above the aggregate of 25.3%. Lastly, lending to upper-income borrowers of 39.7% was slightly below the proxy of 41.1% and slightly above the aggregate of 37.1%.

CSB's distribution of borrowers at different income levels is reasonable for refinance loans.

Home Improvement Lending

In 2016, CSB originated 38 home improvement loans, of which 5.3% were made to low-income borrowers which was below the proxy of 17.4% and the aggregate of all lenders at 8.9%. It is noted that the homes that low-income borrowers can afford may not be appreciating in value as quickly as homes that higher-income borrower can afford. According to Sperling's best places home appreciation value over the past 10 years for the counties that comprise Non-metropolitan Ohio has ranged from 5.6% to 6.6%. Lending to moderate-income borrowers was 21.1% which exceeded the proxy of 18.6% and the aggregate of 16.9%. Lending to middle-income borrowers was 36.8% or above the proxy of 23.1% and the aggregate of 26.2%. Lending to upper-income borrowers was 26.3%, which was below the proxy of 64.3% and the aggregate of 43.6%.

In 2017, CSB originated 41 home improvement loans, of which 14.6% were to low-income borrowers which was slightly below the proxy of 17.1%, but significantly above the aggregate of 8.3%. Lending to moderate-income borrowers at 26.8% was above the proxy of 19.4% and the aggregate of all lenders at 19.5%. Lending to middle-income borrowers was 24.4% which was slightly above the proxy of 22.4% and was slightly below the aggregate of 28.9%. Lastly, lending to upper-income borrowers was 24.4%, which was below the proxy and aggregate.

CSB's distribution of borrowers at different income levels is reasonable overall for home improvement loans.

Small Business Lending

CSB's lending in the evaluation period (2017) to businesses with revenue of \$1 million or less (47.3%) is below the percentage of such businesses in the assessment area (86.8%), which is the proxy. Further analysis of small business lending shows 62.5% of CSB's small business loans were for \$100,000 or less. Typically, the extent to which a bank is willing to grant loans of

\$100,000 or less is reviewed because smaller businesses often have a greater need for small-dollar loans. Further, the assessment area has a significant Amish population. According to The Daily Record's article "Rapidly Growing Amish Population"¹¹, the Amish population is growing and, due to the limited availability of farm land, the Amish will be more likely to seek non-farm jobs. According to Business Insider¹² "Many Amish communities have low-interest loan programs to help young adults buy their own land and get their start in the business world. Community members with money contribute to these funds and don't ask for high payoffs in return." As the Amish begin exploring other employment through the opening of small businesses, CSB's ability to originate small business loans may be impacted as the bank may have difficulty competing with the Amish communities' low cost of funds. Therefore, the borrower distribution for small business lending is excellent.

Small Farm Lending

CSB's lending to farms in the evaluation period (2017) with revenue of \$1 million or less (72.1%) was below the proxy (98.4%). Further analysis of small farm lending shows 74.4% of CSB's small farm loans were for \$100,000 or less. Typically, the extent to which a bank is willing to grant loans of \$100,000 or less is reviewed because smaller farms often have a greater need for small dollar loans. In addition, as the assessment area's population is comprised of a large population of Amish, small farm loans may be difficult to originate given the community funding sources offering low-cost loans to members of the Amish community. The borrower distribution for small farm lending is excellent.

Geographic Distribution of Lending

Gaps in lending to different geographies in the assessment area are moderate. In 2016, CSB made loans in 82.7% of its geographies. The bank did not make any loans in low geographies and made 62.5% in moderate-, 91.9% in middle-, and 66.7% in upper-income geographies. In the assessment area, there were only 99 housing units in the single low-income tract in the bank's assessment area and, of those, only 19.2% were owner occupied. In addition, of the unemployed in the assessment area, 9.7% reside in the low-income geography. These factors limit the bank's ability to originate loans in the low-income tract. In 2017, the bank originated loans in 100.0% of the census tracts in the assessment area. In 2017, the bank did not have a low-income tract in its assessment area and two additional census tracts in Wayne County were added to the assessment area but the changes do not have a substantial impact on the assessment area overall.

Overall, CSB's distribution of lending among geographies is reasonable.

Consumer Lending

CSB originated 730 consumer loans in the assessment area during the evaluation period (2017) that were comprised of 248 (34.0%) home equity; 277 (37.9%) motor vehicle; 95 (13.0%) other-secured; and 110 (15.1%) other-unsecured loans. Of the 730 consumer loans, 19 were made in

¹¹ The Daily Record, "Rapidly Growing Amish Population"

¹² Business Insider "13 Money Secrets From the Amish"

moderate-, 658 in middle-, and 53 in upper-income census tracts. CSB's performance was compared to the number of households in the assessment area (proxy) for motor vehicle, other-secured, and other-unsecured loans, while the number of families in the assessment area was used for home equity.

In moderate-income tracts, CSB was significantly below the proxy for home equity loans, well below the proxy for motor vehicle loans, significantly below the proxy for other-secured loans and other-unsecured loans. While lending was below the proxy, demographic factors may have impacted the bank's ability to lend in moderate-income census tracts. Specifically, of the households residing in moderate-income tracts 19.3% are below the poverty level, 19.7% of households receive public assistance, and 25.4% of renters have rent costs greater than 30% of income. In addition, of the households that are families, only 9.6% reside in moderate-income tracts and 17.2% of these families are below the poverty level.

Overall, CSB's geographic distribution of consumer loans is reasonable.

Home Equity Lending

CSB originated 248 home equity loans in the assessment area during the evaluation period. Originations in moderate-income census tracts were at 2.0%, which is significantly below the proxy of 8.7%. As stated above, of the households that are families, only 9.6% reside in moderate-income tracts and 17.2% of the families are living below the poverty level. Thus, these demographics may have a significant impact on the bank's ability to originate home equity loans. Lending in middle-income tracts, at 88.3% is slightly above proxy at 74.9%. In upper-income tracts, lending at 9.7% was below the proxy at 59.1%.

CSB's geographic distribution of home equity loans, considering the demographics of the assessment area, is reasonable.

Motor Vehicle Lending

CSB originated 277 motor vehicle loans in the assessment area during the evaluation period. Motor vehicle lending in moderate-income census tracts of 3.2% was well below the proxy of 12.1%. Of the population in the assessment area that is unemployed, 8.7% reside in moderate-income tracts, which may limit the bank's ability to originate motor vehicle loans. In addition, in moderate-income tract 25.4% of renters have rent costs greater than 30.0% of their income, thus further reducing their disposable income to afford a motor vehicle loan. Lending in middle-income census tracts at 92.1% is above the proxy at 72.9% and lending in upper-income tracts at 4.7% was well below the proxy of 14.9%.

CSB's geographic distribution of motor vehicle loans, considering the demographics of the assessment area, is reasonable.

Other-Secured Lending

CSB originated 95 other-secured loans in the assessment area during the evaluation period. Other-

secured lending in moderate-income census tracts was 2.1%, which was significantly below the proxy at 12.1%. Household poverty levels in moderate-income census tracts are 19.3% which may limit the bank's ability to make other-secured loans. Lending in middle-income census tracts at 89.5% was slightly above the proxy of 72.9% and lending in upper-income tracts at 8.4% was below the proxy of 14.9%.

CSB's geographic distribution of other-secured loans is reasonable.

Other-Unsecured Lending

CSB originated 110 other-unsecured loans in the assessment area during the evaluation period. Other-unsecured lending in moderate income census tracts was 2.7% which was significantly below the proxy. In moderate-income census tracts, the percentage of unemployed is 8.7% which is above the average unemployment rate of 5.5% for the assessment area. Given that these loans are unsecured, this could have a significant impact on the bank's ability to generate other-unsecured loans in moderate-income tracts. Lending in middle-income tracts at 90.0% was slightly above the proxy. Lending in upper-income tracts of 7.3% was well below the proxy.

CSB's geographic distribution of other-unsecured loans is reasonable.

HMDA Lending

During the evaluation period (2016 and 2017), CSB originated 507 HMDA loans comprised of 264 home purchase (52.89%), 164 refinance (32.8%), and 79 home improvement (15.8%). CSB's performance was compared to the number of owner-occupied housing units in the assessment area (proxy) and the aggregate of all residential lenders (peer) in this market that are HMDA reporters.

Poverty levels, lack of affordability, and general economic conditions in the assessment area, which provide limited lending opportunities, were also considered as part of the evaluation. According to the 2010 Census Bureau (used for 2016 data), of the housing units in the assessment area, 19.2% were owner-occupied in low- and 56.8% in moderate-income tracts. Of the families residing in low- and moderate-income tracts, 0.6% and 22.6% are below poverty, respectively. Lastly, the of the available labor force in low- and moderate-income tracts 9.7% and 9.1% are unemployed in these tracts. According to the 2015 ACS (used for 2017 data), of the housing units in the assessment area, 46.6% were owner-occupied in moderate-income tracts. Of the families residing in moderate-income tracts, 17.2% are below poverty. In addition, of the available labor force in moderate-income tracts 8.7% are unemployed.

Lending in low and moderate-income tracts overall was below proxy and peer but, taking into context the demographics in low and moderate-income census tracts, HMDA lending is reasonable.

Home Purchase Lending

In 2016, CSB made 135 home purchase loans with none in the low-income census tract; however, the percentage of owner-occupied units in this tract was negligible. Of the 99 housing units in the

assessment area only 19 were owner-occupied and, given the poverty level and unemployment rates discussed above, it may be difficult to originate home purchase loans in the low-income tract. Lending in moderate-income tracts was 6.7%, which was below the proxy of 11.3% and below the aggregate of 11.1%. Lending in middle-income tracts at 84.4% was slightly above the proxy of 76.9% and aggregate of 71.3%. Lastly, lending in upper-income tracts was 8.9% or slightly below the proxy of 11.8% and below the aggregate of 17.5%.

In 2017, CSB made 6.2% of its loans in moderate-income tracts which was below the proxy of 8.7% and aggregate of 11.9%. In middle-income tracts 82.2% of loans were originated which were slightly above the proxy of 74.9% and aggregate of 66.7%. Lastly, lending in upper-income tracts was 10.9% which was below the proxy of 16.4% and the aggregate of 21.3%.

CSB's geographic distribution overall for home purchase loans is reasonable.

Refinance Lending

In 2016, CSB made 91 refinance loans with none made in its low-income tract, which was near the aggregate of 0.1%. Lending in moderate income tracts was 2.2% which was significantly below the proxy of 11.3% and the aggregate of 11.0%. Lending in middle-income tracts was 89.0% which was slightly above the proxy of 76.9% and aggregate at 71.3%. Lastly, lending in upper-income tracts at 8.8% was below the 11.8% proxy and well below the aggregate of 17.6%.

In 2017, CSB made 73 refinance loans. Of the loans made 6.8% were originated in moderate-income tracts which was slightly below the proxy of 8.7% and aggregate of 8.1%. Lending in middle-income tracts was 83.6% which was slightly above the proxy of 74.9% and aggregate of 69.8%. Lastly, lending in upper-income tracts was 9.6% which was below the proxy of 16.4% and well below the aggregate of 22.1%.

CSB's geographic distribution overall for refinance loans is reasonable.

Home Improvement Lending

In 2016, CSB made 38 home improvement loans. Of the 38 loans, CSB did not make any home improvement loans in its low-income tract, which was the same as the aggregate of lenders who also did not originate any home improvement loans. As stated previously, the demographics of the low-income tract negatively impact the bank's ability to originate HMDA loans. In moderate-income tracts the bank originated 5.3% of loans or well below the proxy of 11.3% but equal to the aggregate. In middle-income tracts the bank originated 94.7% of its loans which is slightly above the proxy of 76.9% and aggregate of 80.4%. Lastly, lending in upper-income tracts was 0.0% which was significantly below the proxy (11.8%) and aggregate (14.2%).

In 2017, CSB made 41 home improvement loans of which 7.3% were made in moderate-income tracts which was slightly below the proxy of 8.7% and aggregate of 7.9%. Lending in middle-income tracts at 82.9% was slightly above the proxy of 74.9% and aggregate of 72.6%. Lastly, lending in upper-income tracts of 9.8% was below the proxy of 16.4% and aggregate of 19.5%.

CSB's geographic distribution overall for home improvement is reasonable.

Small Business Lending

CSB originated 277 small business loans in the assessment area during the evaluation period (2017) of which 10 were in moderate-income census tracts (3.6%) which is well below the percentage of businesses in these tracts (12.2%). The assessment area includes a large Amish population (approximately 40,000 individuals). While the Amish have historically worked in the agricultural industry, small businesses are beginning to become popular among the Amish. According to Amish America¹³, "Small business is popular among Amish in [Holmes] settlement with many Amish owned furniture shops, manufacturers, and home builders operation out of the settlement. In addition, Amish America¹⁴ lists 31 Amish owned furniture businesses in the Holmes County area (comprised of the counties of Wayne, Tuscarawas, Coshocton and Holmes). As explained previously, the Amish community offers loans through the communities that are at a lower cost than traditional banks could offer. Thus, the significant Amish population may limit the bank's ability to originate small business loans. The bank originated 236 small business loans (85.2%) in middle-income census tracts, which was slightly above the proxy at 75.0%. For upper-income census tracts, the bank originated 31 small business loans (11.2%), which was slightly below the proxy of 12.8%.

Therefore, given the large population of Amish in the assessment area, geographic distribution of small business lending is reasonable.

Small Farm Lending

CSB originated 43 small farm loans in the assessment area during the evaluation period (2017) but none made in moderate-income tracts, which was below the proxy of 1.9%. In middle-income tracts, the bank originated 100.0% of its loans which was above the proxy of 81.3%. There was no small farm lending in upper-income census tracts. CSB is unique in that the bank's assessment area includes a large Amish population. The Amish's main employment is small farming; however, the Amish have access to other types of funding, such as Amish community funds that offer low-cost loans. In addition, according to The Daily Record, the inherent nature of the Amish lifestyle is agricultural, given that the basic mode of travel is horse and buggy. Typically, the Amish will buy land vacated by farmers in rural areas close to community services. According to Business Insider, farmland is increasingly expensive and, as a result, families divide the land among their children, with each receiving a specific amount of acreage. In addition, some Amish have turned to smaller-sized, intensive farming practices to combat the problem of expensive farmland. To assist the Amish, the communities themselves have low-interest loan programs to help young adults buy their own land. Wealthy community members contribute to these funds and are not seeking high return on investment. In addition, much of the land used for small farms in Wayne County is owned by the Ohio Agricultural Research and Development Center, an extension of The Ohio State University, which further limits the ability to originate small farm loans.

¹³ <http://amishamerica.com/ohio-amish/>

¹⁴ www.amishamerica.com/amish-furniture-ohio/

The geographic distribution of lending is reasonable when demographics of the assessment area are taken into consideration.

Community Development Test

CSB is rated satisfactory under the Community Development Test. CSB's community development performance reflects an adequate responsiveness to the community development needs of the assessment area through community development lending, qualified investments, and community development services, when considering the bank's capacity and the need and availability of such opportunities for community development in the assessment area.

Community Development Loans

CSB originated six community development loans in the assessment area totaling \$4,177,602 since the previous evaluation. Of the six community development loans, three were for community services, two for affordable housing, and one loan was made for economic development. The largest loan made in the assessment area for \$2 million was to finance a local community agency's affordable housing structure in Wooster, Ohio. This level of community development loans is excellent.

Community Development Investments

CSB did not originate any investments in the assessment area during the evaluation period. This represents a poor responsiveness to the needs of the assessment area.

CSB made qualified donations of \$42,942 to support organizations that provide community services targeted to low- and moderate-income individuals. The donations made in the assessment area supported a variety of organizations offering community services and affordable housing. The largest donation in the assessment area totaled \$5,000 to support a local community service organization in Orrville, Ohio.

Community Development Services

CSB demonstrated an adequate responsiveness to the community development service needs of the assessment area by working with 11 agencies and investing 614 hours to provide financial related services to the community. The 614 hours was served primarily by officers and staff member of CSB who held positions in the organizations of director and treasurer and provided needed financial expertise.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
CANTON – MASSILLON OHIO MSA #15940
(Limited-scope Evaluation)**

The Canton-Massillon Ohio MSA consists of the entirety of Stark County. Of the 86 tracts in the Canton-Massillon Ohio MSA, nine are low (10.5%), 11 are moderate (12.8%), 52 are middle (60.5%), 13 are upper-income (15.1%) and one tract's income is unknown (1.2%).

CSB operates one branch with an ATM in a middle-income census tract in the assessment area. This represents 7% of CSB's total branches.

As of June 30, 2018, CSB had \$582,886 in deposits in this assessment area, representing a market share of 0.2%. CSB is ranked 17th of 18 institutions in the Canton-Massillon Ohio MSA.

From January 1, 2017 through December 31, 2017, CSB originated 70 consumer loans and 39 small business loans. From January 1, 2016 through December 31, 2017, CSB originated 71 HMDA loans. Based on CSB's lending volume, a limited-scope review was conducted in the assessment area.

The following tables illustrate the demographics of the Canton-Massillon Ohio MSA.

Combined Demographics Report

Assessment Area(s): Canton-Massillon OH MSA #15940 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	10.5	5,830	5.9	2,669	45.8	19,264	19.5
Moderate-income	11	12.8	10,588	10.7	2,502	23.6	18,477	18.7
Middle-income	52	60.5	62,733	63.5	4,732	7.5	21,556	21.8
Upper-income	13	15.1	19,615	19.9	724	3.7	39,513	40
Unknown-income	1	1.2	44	0	21	47.7	0	0
Total Assessment Area	86	100.0	98,810	100.0	10,648	10.8	98,810	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	12,258	3,851	3.7	31.4	6,032	49.2	2,375	19.4
Moderate-income	20,383	9,183	8.9	45.1	8,500	41.7	2,700	13.2
Middle-income	104,080	69,706	67.3	67	25,992	25	8,382	8.1
Upper-income	27,833	20,832	20.1	74.8	5,624	20.2	1,377	4.9
Unknown-income	908	49	0	5.4	616	67.8	243	26.8
Total Assessment Area	165,462	103,621	100.0	62.6	46,764	28.3	15,077	9.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	746	5.9	592	5.3	149	11	5	3.7
Moderate-income	925	7.3	816	7.3	103	7.6	6	4.5
Middle-income	8,231	64.7	7,320	65.1	821	60.6	90	67.2
Upper-income	2,521	19.8	2,264	20.1	235	17.4	22	16.4
Unknown-income	302	2.4	245	2.2	46	3.4	11	8.2
Total Assessment Area	12,725	100.0	11,237	100.0	1,354	100.0	134	100.0
Percentage of Total Businesses:			88.3		10.6		1.1	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	3	1.2	3	1.2	0	0	0	0
Moderate-income	1	0.4	1	0.4	0	0	0	0
Middle-income	222	85.7	219	86.2	3	60	0	0
Upper-income	33	12.7	31	12.2	2	40	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	259	100.0	254	100.0	5	100.0	0	.0
Percentage of Total Farms:			98.1		1.9		.0	

2017 FFIEC Census Data and 2017 D&B Information

Combined Demographics Report

Assessment Area(s): Canton-Massillon OH MSA #15940 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	9.3	4,556	4.5	1,742	38.2	19,573	19.4
Moderate-income	12	14	11,263	11.2	2,474	22	18,902	18.7
Middle-income	46	53.5	56,340	55.8	4,616	8.2	21,664	21.5
Upper-income	20	23.3	28,815	28.5	804	2.8	40,835	40.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	86	100.0	100,974	100.0	9,636	9.5	100,974	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,265	3,599	3.4	35.1	4,783	46.6	1,883	18.3
Moderate-income	22,512	10,296	9.6	45.7	8,303	36.9	3,913	17.4
Middle-income	89,260	62,004	57.9	69.5	21,796	24.4	5,460	6.1
Upper-income	42,787	31,266	29.2	73.1	8,874	20.7	2,647	6.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	164,824	107,165	100.0	65.0	43,756	26.5	13,903	8.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	957	6.7	767	6	174	12.9	16	11.2
Moderate-income	1,296	9.1	1,153	9.1	136	10	7	4.9
Middle-income	7,014	49.4	6,329	49.9	609	45	76	53.1
Upper-income	4,924	34.7	4,445	35	435	32.1	44	30.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	14,191	100.0	12,694	100.0	1,354	100.0	143	100.0
Percentage of Total Businesses:			89.5		9.5		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.7	2	0.7	0	0	0	0
Moderate-income	4	1.3	4	1.3	0	0	0	0
Middle-income	230	74.9	228	75.2	2	50	0	0
Upper-income	71	23.1	69	22.8	2	50	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	307	100.0	303	100.0	4	100.0	0	.0
Percentage of Total Farms:			98.7		1.3		.0	

2016 FFIEC Census Data and 2016 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CANTON-MASSILLON OHIO MSA #15940

The Canton-Massillon Ohio MSA's performance was evaluated using available data, including performance and demographic information and compared with CSB's overall performance. To conduct meaningful analysis in the assessment area, all consumer products were combined as were all HMDA products. In addition, for 2016 data, only combined HMDA loans were evaluated due to limited amount of consumer and small business loans.

For the lending test, CSB received a satisfactory rating in the Canton-Massillon Ohio MSA. Performance in the limited-scope area was consistent with CSB's performance overall. Lending levels were reasonable for geographic distribution of loans and for borrower distribution of loans in this area. Overall, gaps in lending were substantial. CSB's penetration rate in the Canton-Massillon Ohio MSA was 30.2% in 2016 and 55.8% in 2017, with penetration in low- and moderate-income tracts at 0.0% and 16.7% in 2016 and 22.2% and 18.2% in 2017. CSB only operates one branch in the assessment area and competition is significant in the assessment area. This is demonstrated in CSB's deposit market share of 0.2%. Therefore, these factors may make it difficult to originate loans in this assessment area.

For the Community Development Test, CSB received a satisfactory rating. There were three community development loans in the Canton-Massillon Ohio MSA, which is excellent given the competition, location of CSB's branch, and the relative newness to CSB of incorporating all of Stark County in this assessment area. CSB made various donations in the assessment area to a variety of agencies; however, no investments were made, which is poor. In addition, a few community development services were provided, which is adequate.

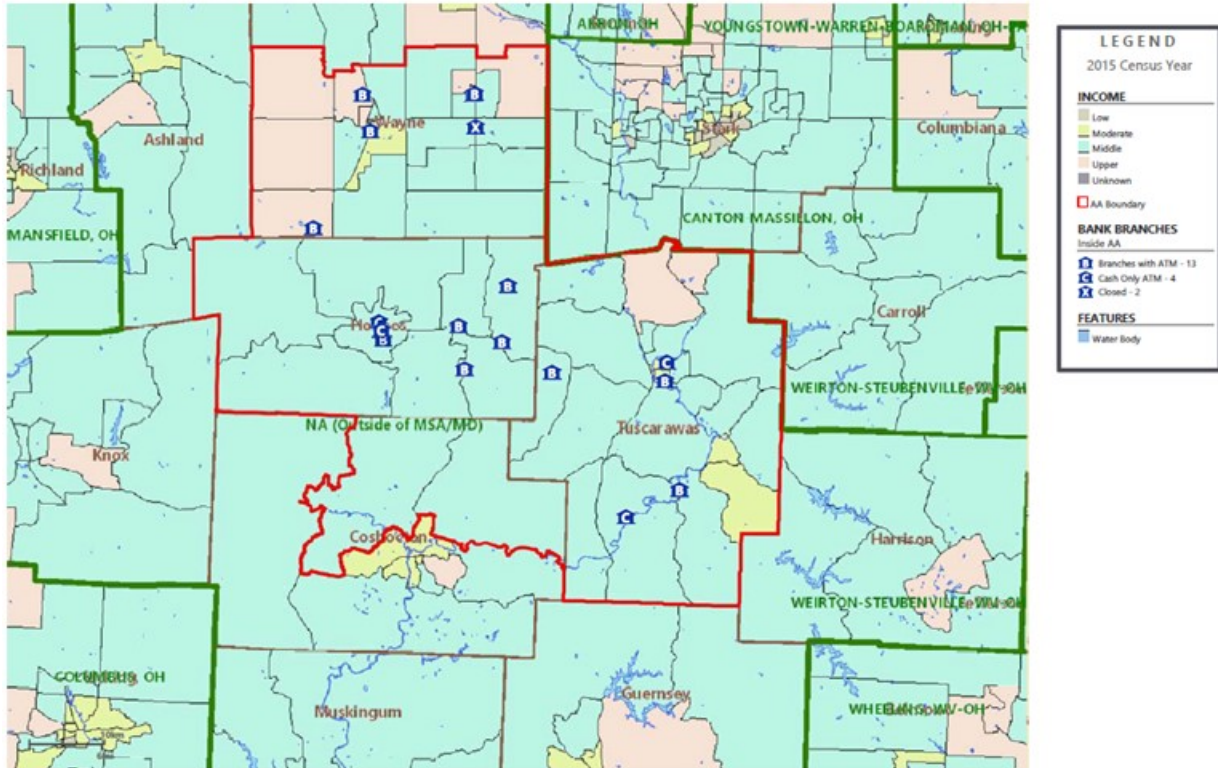
The Canton-Massillon Ohio MSA consists of the entirety of Stark County and is composed of nine low- (10.5% of total tracts) and 11 moderate-income census tracts (12.8% of total tracts). In the assessment area, 28.3% of the housing units are rentals, 9.1% are vacant, and 10.1% are multi-family. The percentage of households below the poverty level in the Canton-Massillon Ohio MSA (13.9%) is lower than the state (15.0%) and the percentage of families below the poverty level in the Canton-Massillon Ohio MSA (10.8%) is lower than the state (11.5%). The unemployment rate in the Canton-Massillon Ohio MSA is 20.9% in low- and 15.0% in moderate-income census tracts. These statistics, in addition to limited market share and branch presence, can limit opportunities to originate consumer, HMDA, and small business loans in the Canton-Massillon Ohio MSA.

Performance in the Canton-Massillon Ohio MSA did not result in a change to the overall rating.

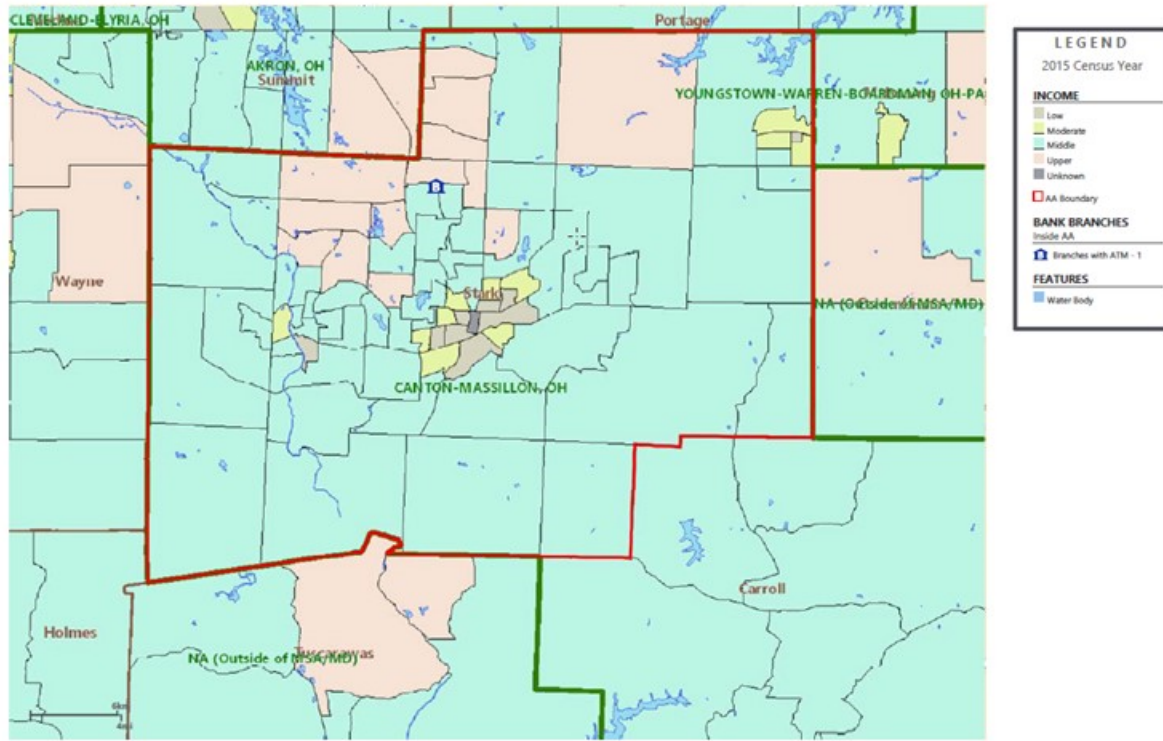
APPENDIX A

ASSESSMENT AREA MAPS

2017 Non Metropolitan Ohio



2017 Canton-Massillon, OH MSA



APPENDIX B

LENDING TABLES

Consumer Loan Distribution Table

Exam: Commercial and Savings Bank

Assessment Area/Group :Non Metropolitan Ohio 2017

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	14	5.6%	907	4.6%
Moderate	5	2.0%	450	2.3%	70	28.2%	4,881	24.5%
Low/Moderate Total	5	2.0%	450	2.3%	84	33.9%	5,788	29.1%
Middle	219	88.3%	17,558	88.2%	64	25.8%	4,360	21.9%
Upper	24	9.7%	1,891	9.5%	90	36.3%	9,138	45.9%
Unknown	0	0.0%	0	0.0%	10	4.0%	614	3.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	248	100.0%	19,899	100.0%	248	100.0%	19,899	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	43	15.5%	391	11.1%
Moderate	9	3.2%	59	1.7%	98	35.4%	1,008	28.5%
Low/Moderate Total	9	3.2%	59	1.7%	141	50.9%	1,399	39.6%
Middle	255	92.1%	3,237	91.5%	51	18.4%	739	20.9%
Upper	13	4.7%	240	6.8%	72	26.0%	1,216	34.4%
Unknown	0	0.0%	0	0.0%	13	4.7%	182	5.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	277	100.0%	3,536	100.0%	277	100.0%	3,536	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	10	10.5%	143	7.5%
Moderate	2	2.1%	6	0.3%	30	31.6%	485	25.6%
Low/Moderate Total	2	2.1%	6	0.3%	40	42.1%	628	33.1%
Middle	85	89.5%	1,688	89.0%	19	20.0%	317	16.7%
Upper	8	8.4%	203	10.7%	18	18.9%	714	37.6%
Unknown	0	0.0%	0	0.0%	18	18.9%	238	12.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	95	100.0%	1,897	100.0%	95	100.0%	1,897	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	20	18.2%	68	16.8%
Moderate	3	2.7%	12	2.9%	33	30.0%	114	28.0%
Low/Moderate Total	3	2.7%	12	2.9%	53	48.2%	183	44.7%
Middle	99	90.0%	379	92.8%	22	20.0%	120	29.4%
Upper	8	7.3%	17	4.2%	17	15.5%	89	21.7%
Unknown	0	0.0%	0	0.0%	18	16.4%	17	4.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	110	100.0%	409	100.0%	110	100.0%	409	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	87	11.9%	1,509	5.9%
Moderate	19	2.6%	527	2.0%	231	31.6%	6,489	25.2%
Low/Moderate Total	19	2.6%	527	2.0%	318	43.6%	7,998	31.1%
Middle	658	90.1%	22,863	88.8%	156	21.4%	5,536	21.5%
Upper	53	7.3%	2,351	9.1%	197	27.0%	11,156	43.3%
Unknown	0	0.0%	0	0.0%	59	8.1%	1,050	4.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	730	100.0%	25,741	100.0%	730	100.0%	25,741	100.0%

Consumer Loan Distribution Table

Exam: Commercial and Savings Bank

Assessment Area/Group : Canton-Massillon OH MSA #15940 2017

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	1	6.3%	30	1.6%
Moderate	1	6.3%	11	0.6%	2	12.5%	103	5.4%
Low/Moderate Total	1	6.3%	11	0.6%	3	18.8%	133	7.0%
Middle	10	62.5%	1,193	62.4%	4	25.0%	336	17.6%
Upper	5	31.3%	708	37.0%	8	50.0%	1,318	68.9%
Unknown	0	0.0%	0	0.0%	1	6.3%	125	6.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	1,913	100.0%	16	100.0%	1,913	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	2	22.2%	16	20.1%
Moderate	1	11.1%	7	9.1%	1	11.1%	6	8.1%
Low/Moderate Total	1	11.1%	7	9.1%	3	33.3%	22	28.3%
Middle	6	66.7%	51	64.5%	3	33.3%	31	38.7%
Upper	2	22.2%	21	26.4%	3	33.3%	26	33.0%
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	9	100.0%	79	100.0%	9	100.0%	79	100.0%
	Other - Secured							
Low	1	2.7%	29	4.1%	2	5.4%	3	0.4%
Moderate	1	2.7%	15	2.1%	5	13.5%	136	18.9%
Low/Moderate Total	2	5.4%	44	6.2%	7	18.9%	139	19.3%
Middle	28	75.7%	524	73.1%	9	24.3%	163	22.7%
Upper	7	18.9%	149	20.7%	17	45.9%	398	55.5%
Unknown	0	0.0%	0	0.0%	4	10.8%	17	2.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	37	100.0%	717	100.0%	37	100.0%	717	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	1	12.5%	1	1.4%
Moderate	1	12.5%	8	7.8%	2	25.0%	10	10.1%
Low/Moderate Total	1	12.5%	8	7.8%	3	37.5%	12	11.6%
Middle	6	75.0%	84	82.2%	2	25.0%	18	15.8%
Upper	1	12.5%	10	9.9%	3	37.5%	74	72.6%
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	8	100.0%	102	100.0%	8	100.0%	102	100.0%
	Consumer Loan Totals							
Low	1	1.4%	29	1.0%	6	8.6%	50	1.8%
Moderate	4	5.7%	41	1.5%	10	14.3%	256	9.1%
Low/Moderate Total	5	7.1%	71	2.5%	16	22.9%	306	10.9%
Middle	50	71.4%	1,852	65.9%	18	25.7%	546	19.4%
Upper	15	21.4%	888	31.6%	31	44.3%	1,817	64.6%
Unknown	0	0.0%	0	0.0%	5	7.1%	142	5.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	70	100.0%	2,811	100.0%	70	100.0%	2,811	100.0%

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HMDA Loan Distribution Table

Exam: Commercial and Savings Bank

Assessment Area/Group :Non Metropolitan Ohio 2017

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	5	3.9%	247	1.4%
Moderate	8	6.2%	583	3.3%	37	28.7%	4,213	23.5%
Low/Moderate Total	8	6.2%	583	3.3%	42	32.6%	4,460	24.9%
Middle	106	82.2%	15,223	85.0%	40	31.0%	5,588	31.2%
Upper	14	10.9%	2,004	11.2%	44	34.1%	7,565	42.2%
Unknown	1	0.8%	100	0.6%	3	2.3%	297	1.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	129	100.0%	17,910	100.0%	129	100.0%	17,910	100.0%
Refinance								
Low	0	0.0%	0	0.0%	2	2.7%	89	1.0%
Moderate	5	6.8%	516	5.6%	21	28.8%	1,771	19.4%
Low/Moderate Total	5	6.8%	516	5.6%	23	31.5%	1,860	20.4%
Middle	61	83.6%	7,727	84.6%	16	21.9%	2,320	25.4%
Upper	7	9.6%	893	9.8%	29	39.7%	4,312	47.2%
Unknown	0	0.0%	0	0.0%	5	6.8%	644	7.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	73	100.0%	9,136	100.0%	73	100.0%	9,136	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	6	14.6%	75	2.6%
Moderate	3	7.3%	412	14.2%	11	26.8%	475	16.4%
Low/Moderate Total	3	7.3%	412	14.2%	17	41.5%	550	19.0%
Middle	34	82.9%	2,473	85.3%	10	24.4%	883	30.4%
Upper	4	9.8%	15	0.5%	10	24.4%	971	33.5%
Unknown	0	0.0%	0	0.0%	4	9.8%	496	17.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	41	100.0%	2,900	100.0%	41	100.0%	2,900	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	0	0.0%	0	0.0%	13	5.3%	411	1.4%
Moderate	16	6.6%	1,511	5.0%	69	28.4%	6,459	21.6%
Low/Moderate Total	16	6.6%	1,511	5.0%	82	33.7%	6,870	22.9%
Middle	201	82.7%	25,423	84.9%	66	27.2%	8,791	29.4%
Upper	25	10.3%	2,912	9.7%	83	34.2%	12,848	42.9%
Unknown	1	0.4%	100	0.3%	12	4.9%	1,437	4.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	243	100.0%	29,946	100.0%	243	100.0%	29,946	100.0%

HMDA Loan Distribution Table

Exam: Commercial and Savings Bank

Assessment Area/Group : Non Metropolitan Ohio 2016

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	7	5.2%	525	2.5%
Moderate	9	6.7%	872	4.2%	36	26.7%	4,429	21.2%
Low/Moderate Total	9	6.7%	872	4.2%	43	31.9%	4,954	23.8%
Middle	114	84.4%	18,358	88.1%	36	26.7%	5,703	27.4%
Upper	12	8.9%	1,614	7.7%	50	37.0%	9,632	46.2%
Unknown	0	0.0%	0	0.0%	6	4.4%	555	2.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	135	100.0%	20,844	100.0%	135	100.0%	20,844	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	3	3.3%	169	1.3%
Moderate	2	2.2%	131	1.0%	20	22.0%	2,316	17.6%
Low/Moderate Total	2	2.2%	131	1.0%	23	25.3%	2,485	18.8%
Middle	81	89.0%	12,045	91.3%	19	20.9%	2,493	18.9%
Upper	8	8.8%	1,016	7.7%	35	38.5%	5,304	40.2%
Unknown	0	0.0%	0	0.0%	14	15.4%	2,910	22.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	91	100.0%	13,192	100.0%	91	100.0%	13,192	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	2	5.3%	46	1.8%
Moderate	2	5.3%	12	0.5%	8	21.1%	742	29.2%
Low/Moderate Total	2	5.3%	12	0.5%	10	26.3%	788	31.1%
Middle	36	94.7%	2,525	99.5%	14	36.8%	975	38.4%
Upper	0	0.0%	0	0.0%	10	26.3%	638	25.1%
Unknown	0	0.0%	0	0.0%	4	10.5%	136	5.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	2,537	100.0%	38	100.0%	2,537	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	0	0.0%	0	0.0%	12	4.5%	740	2.0%
Moderate	13	4.9%	1,015	2.8%	64	24.2%	7,487	20.5%
Low/Moderate Total	13	4.9%	1,015	2.8%	76	28.8%	8,227	22.5%
Middle	231	87.5%	32,928	90.0%	69	26.1%	9,171	25.1%
Upper	20	7.6%	2,630	7.2%	95	36.0%	15,574	42.6%
Unknown	0	0.0%	0	0.0%	24	9.1%	3,601	9.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	264	100.0%	36,573	100.0%	264	100.0%	36,573	100.0%

HMDA Loan Distribution Table

Exam: Commercial and Savings Bank

Assessment Area/Group : Canton-Massillon OH MSA #15940 2017

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	3	12.5%	175	5.5%
Moderate	1	4.2%	40	1.2%	4	16.7%	345	10.8%
Low/Moderate Total	1	4.2%	40	1.2%	7	29.2%	520	16.2%
Middle	18	75.0%	2,024	63.2%	7	29.2%	860	26.8%
Upper	5	20.8%	1,141	35.6%	9	37.5%	1,629	50.8%
Unknown	0	0.0%	0	0.0%	1	4.2%	196	6.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	3,205	100.0%	24	100.0%	3,205	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	12.5%	68	5.4%	0	0.0%	0	0.0%
Low/Moderate Total	1	12.5%	68	5.4%	0	0.0%	0	0.0%
Middle	5	62.5%	734	57.9%	2	25.0%	119	9.4%
Upper	2	25.0%	465	36.7%	4	50.0%	846	66.8%
Unknown	0	0.0%	0	0.0%	2	25.0%	302	23.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	1,267	100.0%	8	100.0%	1,267	100.0%
Home Improvement								
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	1	50.0%	60	40.0%	1	50.0%	60	40.0%
Upper	1	50.0%	90	60.0%	1	50.0%	90	60.0%
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	2	100.0%	150	100.0%	2	100.0%	150	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	2	100.0%	372	100.0%	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%	2	100.0%	372	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	372	100.0%	2	100.0%	372	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	3	8.3%	175	3.5%
Moderate	2	5.6%	108	2.2%	4	11.1%	345	6.9%
Low/Moderate Total	2	5.6%	108	2.2%	7	19.4%	520	10.4%
Middle	26	72.2%	3,190	63.9%	10	27.8%	1,039	20.8%
Upper	8	22.2%	1,696	34.0%	14	38.9%	2,565	51.4%
Unknown	0	0.0%	0	0.0%	5	13.9%	870	17.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	4,994	100.0%	36	100.0%	4,994	100.0%

HMDA Loan Distribution Table

Exam: Commercial and Savings Bank

Assessment Area/Group : Canton-Massillon OH MSA #15940 2016

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	7.7%	64	4.2%
Moderate	3	23.1%	225	14.9%	2	15.4%	110	7.3%
Low/Moderate Total	3	23.1%	225	14.9%	3	23.1%	174	11.5%
Middle	4	30.8%	344	22.8%	2	15.4%	302	20.0%
Upper	6	46.2%	943	62.4%	5	38.5%	825	54.6%
Unknown	0	0.0%	0	0.0%	3	23.1%	211	14.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	1,512	100.0%	13	100.0%	1,512	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	5.9%	60	2.2%
Moderate	0	0.0%	0	0.0%	2	11.8%	117	4.4%
Low/Moderate Total	0	0.0%	0	0.0%	3	17.6%	177	6.6%
Middle	8	47.1%	1,332	49.9%	1	5.9%	206	7.7%
Upper	9	52.9%	1,336	50.1%	8	47.1%	1,384	51.9%
Unknown	0	0.0%	0	0.0%	5	29.4%	901	33.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	2,668	100.0%	17	100.0%	2,668	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	50.0%	135	41.3%
Low/Moderate Total	0	0.0%	0	0.0%	2	50.0%	135	41.3%
Middle	3	75.0%	315	96.3%	2	50.0%	192	58.7%
Upper	1	25.0%	12	3.7%	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	4	100.0%	327	100.0%	4	100.0%	327	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	1	100.0%	800	100.0%	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%	1	100.0%	800	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	800	100.0%	1	100.0%	800	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	2	5.7%	124	2.3%
Moderate	3	8.6%	225	4.2%	6	17.1%	362	6.8%
Low/Moderate Total	3	8.6%	225	4.2%	8	22.9%	486	9.2%
Middle	16	45.7%	2,791	52.6%	5	14.3%	700	13.2%
Upper	16	45.7%	2,291	43.2%	13	37.1%	2,209	41.6%
Unknown	0	0.0%	0	0.0%	9	25.7%	1,912	36.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	35	100.0%	5,307	100.0%	35	100.0%	5,307	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Commercial and Savings Bank

Selected Year: 2017

Non Metropolitan Ohio 2017

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	101	4.44%	7,377	2.35%
Moderate	270	11.87%	25,507	8.12%	501	22.03%	53,557	17.05%
<i>Low/Moderate Total</i>	<i>270</i>	<i>11.87%</i>	<i>25,507</i>	<i>8.12%</i>	<i>602</i>	<i>26.47%</i>	<i>60,934</i>	<i>19.39%</i>
Middle	1,516	66.67%	211,303	67.23%	536	23.57%	71,438	22.74%
Upper	484	21.28%	77,057	24.53%	712	31.31%	132,150	42.06%
Unknown	4	0.18%	322	0.1%	424	18.65%	49,667	15.81%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,274	100.0%	314,189	100.0%	2,274	100.0%	314,189	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	78	6.69%	5,635	3.78%
Moderate	94	8.06%	7,783	5.22%	186	15.95%	17,474	11.71%
<i>Low/Moderate Total</i>	<i>94</i>	<i>8.06%</i>	<i>7,783</i>	<i>5.22%</i>	<i>264</i>	<i>22.64%</i>	<i>23,109</i>	<i>15.49%</i>
Middle	814	69.81%	104,863	70.28%	295	25.3%	35,002	23.46%
Upper	258	22.13%	36,563	24.3%	433	37.14%	69,312	46.45%
Unknown	0	0.0%	0	0.0%	174	14.92%	21,786	14.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,166	100.0%	149,209	100.0%	1,166	100.0%	149,209	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	23	8.3%	592	2.92%
Moderate	22	7.94%	1,149	5.67%	54	19.49%	3,485	17.18%
<i>Low/Moderate Total</i>	<i>22</i>	<i>7.94%</i>	<i>1,149</i>	<i>5.67%</i>	<i>77</i>	<i>27.82%</i>	<i>4,077</i>	<i>20.1%</i>
Middle	201	72.56%	15,186	74.88%	80	28.88%	5,580	27.51%
Upper	54	19.46%	3,946	19.46%	106	38.27%	9,325	45.98%
Unknown	0	0.0%	0	0.0%	14	5.05%	1,299	6.41%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	277	100.0%	20,231	100.0%	277	100.0%	20,231	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	33.33%	2,233	18.57%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>2</i>	<i>33.33%</i>	<i>2,233</i>	<i>18.57%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	3	50.0%	9,650	80.23%	0	0.0%	0	0.0%
Upper	1	16.67%	145	1.21%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	6	100.0%	12,028	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	12,028	100.0%	6	100.0%	12,028	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	202	5.43%	13,604	2.74%
Moderate	388	10.42%	36,672	7.4%	741	19.9%	74,516	15.03%
<i>Low/Moderate Total</i>	<i>388</i>	<i>10.42%</i>	<i>36,672</i>	<i>7.4%</i>	<i>943</i>	<i>25.32%</i>	<i>88,120</i>	<i>27.77%</i>
Middle	2,534	68.06%	341,002	68.79%	911	24.47%	112,020	22.6%
Upper	797	21.41%	117,711	23.75%	1,251	33.6%	210,787	42.52%
Unknown	4	0.11%	322	0.06%	618	16.6%	84,780	17.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,723	100.0%	495,707	100.0%	3,723	100.0%	495,707	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Commercial and Savings Bank

Selected Year: 2016

Non Metropolitan Ohio 2016

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	3	0.14%	241	0.08%	136	6.14%	10,438	3.48%
Moderate	247	11.15%	23,758	7.92%	486	21.93%	50,352	16.78%
<i>Low/Moderate Total</i>	<i>250</i>	<i>11.29%</i>	<i>23,999</i>	<i>8.00%</i>	<i>622</i>	<i>28.07%</i>	<i>60,790</i>	<i>20.26%</i>
Middle	1,579	71.25%	218,710	72.88%	561	25.32%	74,293	24.76%
Upper	387	17.46%	57,396	19.13%	688	31.05%	125,129	41.7%
Unknown	0	0.0%	0	0.0%	345	15.57%	39,893	13.29%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,216	100.0%	300,103	100.0%	2,216	100.0%	300,103	100.0%
Refinance								
Low	1	0.07%	77	0.04%	80	5.64%	6,020	3.25%
Moderate	156	11.0%	14,145	7.64%	227	16.01%	21,215	11.45%
<i>Low/Moderate Total</i>	<i>157</i>	<i>11.07%</i>	<i>14,222</i>	<i>7.68%</i>	<i>307</i>	<i>21.65%</i>	<i>27,235</i>	<i>14.70%</i>
Middle	1,011	71.3%	136,855	73.89%	321	22.64%	35,898	19.38%
Upper	250	17.63%	34,135	18.43%	533	37.59%	86,301	46.6%
Unknown	0	0.0%	0	0.0%	257	18.12%	35,778	19.32%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,418	100.0%	185,212	100.0%	1,418	100.0%	185,212	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	20	8.89%	691	3.71%
Moderate	12	5.33%	502	2.7%	38	16.89%	2,274	12.22%
<i>Low/Moderate Total</i>	<i>12</i>	<i>5.33%</i>	<i>502</i>	<i>2.7%</i>	<i>58</i>	<i>25.78%</i>	<i>2,965</i>	<i>15.94%</i>
Middle	181	80.44%	14,472	77.79%	59	26.22%	4,477	24.06%
Upper	32	14.22%	3,631	19.52%	98	43.56%	10,478	56.32%
Unknown	0	0.0%	0	0.0%	10	4.44%	685	3.68%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	225	100.0%	18,603	100.0%	225	100.0%	18,603	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	25.0%	856	3.89%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>2</i>	<i>25.0%</i>	<i>856</i>	<i>3.89%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	4	50.0%	16,174	73.49%	0	0.0%	0	0.0%
Upper	2	25.0%	4,978	22.62%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	8	100.0%	22,008	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	22,008	100.0%	8	100.0%	22,008	100.0%
HMDA Totals								
Low	4	0.1%	318	0.06%	236	6.1%	17,149	3.26%
Moderate	417	10.78%	39,261	7.47%	751	19.42%	73,841	14.04%
<i>Low/Moderate Total</i>	<i>421</i>	<i>10.88%</i>	<i>39,579</i>	<i>7.53%</i>	<i>987</i>	<i>25.52%</i>	<i>90,990</i>	<i>17.30%</i>
Middle	2,775	71.76%	386,211	73.43%	941	24.33%	114,668	21.8%
Upper	671	17.35%	100,140	19.04%	1,319	34.11%	221,908	42.19%
Unknown	0	0.0%	0	0.0%	620	16.03%	98,364	18.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,867	100.0%	525,930	100.0%	3,867	100.0%	525,930	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Commercial and Savings Bank

Selected Year: 2017

Canton-Massillon OH MSA #15940 2017

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	88	1.45%	4,354	0.5%	529	8.72%	39,200	4.52%
Moderate	384	6.33%	25,006	2.89%	1,280	21.1%	130,349	15.04%
<i>Low/Moderate Total</i>	<i>472</i>	<i>7.78%</i>	<i>29,360</i>	<i>3.39%</i>	<i>1,809</i>	<i>29.82%</i>	<i>169,549</i>	<i>19.57%</i>
Middle	4,158	68.55%	542,267	62.58%	1,304	21.5%	174,895	20.18%
Upper	1,433	23.62%	294,686	34.01%	1,922	31.68%	387,845	44.76%
Unknown	3	0.03%	226	0.03%	1,031	17.0%	134,250	15.49%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6,066	100.0%	866,539	100.0%	6,066	100.0%	866,539	100.0%
Refinance								
Low	45	1.55%	2,115	0.57%	278	9.6%	19,328	5.21%
Moderate	160	5.52%	8,952	2.41%	508	17.54%	46,209	12.47%
<i>Low/Moderate Total</i>	<i>205</i>	<i>7.08%</i>	<i>11,067</i>	<i>3.09%</i>	<i>786</i>	<i>27.14%</i>	<i>65,537</i>	<i>17.69%</i>
Middle	1,962	67.75%	235,108	63.43%	613	21.17%	66,819	18.05%
Upper	728	25.14%	124,444	33.57%	1,057	36.5%	174,220	47.0%
Unknown	1	0.03%	65	0.02%	440	15.19%	64,108	17.29%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,896	100.0%	370,684	100.0%	2,896	100.0%	370,684	100.0%
Home Improvement								
Low	40	6.73%	375	1.18%	82	13.8%	1,097	3.44%
Moderate	43	7.24%	774	2.43%	142	23.91%	4,247	13.33%
<i>Low/Moderate Total</i>	<i>83</i>	<i>13.97%</i>	<i>1,149</i>	<i>3.61%</i>	<i>224</i>	<i>37.71%</i>	<i>5,344</i>	<i>16.77%</i>
Middle	397	66.84%	19,482	61.13%	133	22.39%	6,299	19.77%
Upper	114	19.19%	11,237	35.26%	221	37.21%	19,265	60.45%
Unknown	0	0.0%	0	0.0%	16	2.69%	960	3.01%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	594	100.0%	31,868	100.0%	594	100.0%	31,868	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	21.05%	4,577	18.67%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>4</i>	<i>21.05%</i>	<i>4,577</i>	<i>18.67%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	13	68.42%	18,976	77.4%	0	0.0%	0	0.0%
Upper	2	10.53%	965	3.94%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	19	100.0%	24,518	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	24,518	100.0%	19	100.0%	24,518	100.0%
HMDA Totals								
Low	173	1.81%	6,844	0.53%	889	9.28%	59,625	4.61%
Moderate	591	6.17%	39,309	3.04%	1,930	20.16%	180,805	13.98%
<i>Low/Moderate Total</i>	<i>764</i>	<i>7.98%</i>	<i>46,153</i>	<i>3.57%</i>	<i>2,819</i>	<i>29.44%</i>	<i>240,430</i>	<i>18.59%</i>
Middle	6,530	68.2%	815,833	63.07%	2,050	21.41%	248,013	19.17%
Upper	2,277	23.78%	431,332	33.34%	3,200	33.42%	581,330	44.94%
Unknown	4	0.04%	291	0.02%	1,506	15.73%	223,836	17.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9,373	100.0%	1,293,609	100.0%	9,373	100.0%	1,293,609	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Commercial and Savings Bank

Selected Year: 2016

Canton-Massillon OH MSA #15940 2016

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	44	0.75%	2,248	0.28%	480	8.18%	35,664	4.4%
Moderate	318	5.42%	20,811	2.57%	1,187	20.22%	116,999	14.43%
<i>Low/Moderate Total</i>	<i>362</i>	<i>6.17%</i>	<i>23,059</i>	<i>2.84%</i>	<i>1,667</i>	<i>28.4%</i>	<i>152,663</i>	<i>18.83%</i>
Middle	3,515	59.88%	424,936	52.41%	1,325	22.57%	171,221	21.22%
Upper	1,993	33.95%	362,832	44.75%	1,697	28.91%	345,017	42.55%
Unknown	0	0.0%	0	0.0%	1,181	20.12%	141,926	17.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5,870	100.0%	\$10,827	100.0%	5,870	100.0%	\$10,827	100.0%
Refinance								
Low	51	1.27%	2,385	0.45%	274	6.84%	19,620	3.73%
Moderate	195	4.87%	11,291	2.15%	595	14.86%	52,983	10.07%
<i>Low/Moderate Total</i>	<i>246</i>	<i>6.15%</i>	<i>13,676</i>	<i>2.6%</i>	<i>869</i>	<i>21.71%</i>	<i>72,603</i>	<i>13.8%</i>
Middle	2,233	55.78%	255,792	48.63%	810	20.23%	90,586	17.22%
Upper	1,524	38.07%	256,561	48.77%	1,418	35.42%	247,640	47.08%
Unknown	0	0.0%	0	0.0%	906	22.63%	115,200	21.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4,003	100.0%	\$26,029	100.0%	4,003	100.0%	\$26,029	100.0%
Home Improvement								
Low	27	4.38%	202	0.56%	96	15.58%	1,327	3.66%
Moderate	63	10.23%	661	1.82%	166	26.95%	4,480	12.37%
<i>Low/Moderate Total</i>	<i>90</i>	<i>14.61%</i>	<i>863</i>	<i>2.38%</i>	<i>262</i>	<i>42.53%</i>	<i>5,807</i>	<i>16.03%</i>
Middle	344	55.84%	17,154	47.36%	126	20.45%	6,407	17.69%
Upper	182	29.55%	18,204	50.26%	196	31.82%	20,583	56.83%
Unknown	0	0.0%	0	0.0%	32	5.19%	3,424	9.45%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	616	100.0%	\$36,221	100.0%	616	100.0%	\$36,221	100.0%
Multi-Family								
Low	3	10.0%	8,720	34.66%	0	0.0%	0	0.0%
Moderate	6	20.0%	1,885	7.49%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>9</i>	<i>30.0%</i>	<i>10,605</i>	<i>42.16%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	11	36.67%	3,577	14.22%	0	0.0%	0	0.0%
Upper	10	33.33%	10,974	43.62%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	30	100.0%	25,156	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	\$25,156	100.0%	30	100.0%	\$25,156	100.0%
HMDA Totals								
Low	125	1.19%	13,555	0.97%	850	8.08%	56,611	4.05%
Moderate	582	5.53%	34,648	2.48%	1,948	18.52%	174,462	12.48%
<i>Low/Moderate Total</i>	<i>707</i>	<i>6.72%</i>	<i>48,203</i>	<i>3.45%</i>	<i>2,798</i>	<i>26.6%</i>	<i>231,073</i>	<i>16.53%</i>
Middle	6,103	58.02%	701,459	50.17%	2,261	21.49%	268,214	19.18%
Upper	3,709	35.26%	648,571	46.39%	3,311	31.48%	613,240	43.86%
Unknown	0	0.0%	0	0.0%	2,149	20.43%	285,706	20.43%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10,519	100.0%	1,395,233	100.0%	10,519	100.0%	1,395,233	100.0%

CRA Loan Distribution Table

Exam: Commercial and Savings Bank

Assessment Area Group: Non Metropolitan Ohio 2017

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	10	3.6%	4,078	5.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	10	3.6%	4,078	5.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	256	85.2%	57,439	72.6%	43	100.0%	4,199	100.0%	0	0.0%	0	0.0%
Upper	31	11.2%	17,627	22.3%	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	277	100.0%	79,143	100.0%	43	100.0%	4,199	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	131	47.3%	42,248	53.4%	31	72.1%	3,262	77.7%	0	0.0%	0	0.0%
Over \$1 Million	93	33.6%	35,424	44.8%	4	9.3%	765	18.2%	0	0.0%	0	0.0%
Not Known	53	19.1%	1,471	1.9%	8	18.6%	172	4.1%	0	0.0%	0	0.0%
Total	277	100.0%	79,143	100.0%	43	100.0%	4,199	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	173	62.5%	6,321	8.0%	32	74.4%	987	23.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	49	17.7%	\$,217	10.4%	5	11.6%	789	18.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	39	14.1%	23,941	30.2%	5	11.6%	1,774	42.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	16	5.8%	40,665	51.4%	1	2.3%	650	15.5%	0	0.0%	0	0.0%
Total	277	100.0%	79,143	100.0%	43	100.0%	4,199	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	84	64.1%	3,285	7.8%	22	71.0%	660	20.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	24	18.3%	3,797	9.0%	5	16.1%	789	24.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	14	10.7%	6,401	15.2%	3	9.7%	1,164	35.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	9	6.9%	28,765	68.1%	1	3.2%	650	19.9%	0	0.0%	0	0.0%
Total	131	100.0%	42,248	100.0%	31	100.0%	3,262	100.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Commercial and Savings Bank

Assessment Area Group: Canton-Massillon OH MSA #15940 2017

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	4	10.3%	198	1.5%	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%	0	0.0%	0	0.0%
Low/Moderate Total	4	10.3%	198	1.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	30	76.0%	9,480	69.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	5	12.8%	3,990	29.2%	1	100.0%	4	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	100.0%	13,668	100.0%	1	100.0%	4	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	18	46.2%	5,507	40.3%	1	100.0%	4	100.0%	0	0.0%	0	0.0%
Over \$1 Million	20	51.3%	8,131	59.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	1	2.6%	30	0.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	100.0%	13,668	100.0%	1	100.0%	4	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	18	46.2%	932	6.8%	1	100.0%	4	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	10	25.6%	1,942	14.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	20.5%	3,587	26.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	3	7.7%	7,207	52.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	100.0%	13,668	100.0%	1	100.0%	4	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	7	38.9%	227	4.1%	1	100.0%	4	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	6	33.3%	996	18.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	4	22.2%	1,577	28.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	5.6%	2,707	49.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	18	100.0%	5,507	100.0%	1	100.0%	4	100.0%	0	0.0%	0	0.0%

APPENDIX C GLOSSARY OF TERMS

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

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

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

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

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

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

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

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and

total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and 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 under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An 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. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an 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 evaluation. 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 the branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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

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

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