

# **PUBLIC DISCLOSURE**

November 26, 2018

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Portage Community Bank  
RSSD #2668598

1311 East Main St.  
Ravenna, OH 44266

Federal Reserve Bank of Cleveland

P.O. Box 6387  
Cleveland, OH 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 geographic distribution of loans reflects a reasonable dispersion throughout 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 and;
- There were no CRA-related complaints filed against Portage Community Bank since the previous CRA examination.
- Community development performance demonstrates an adequate responsiveness to community development needs.

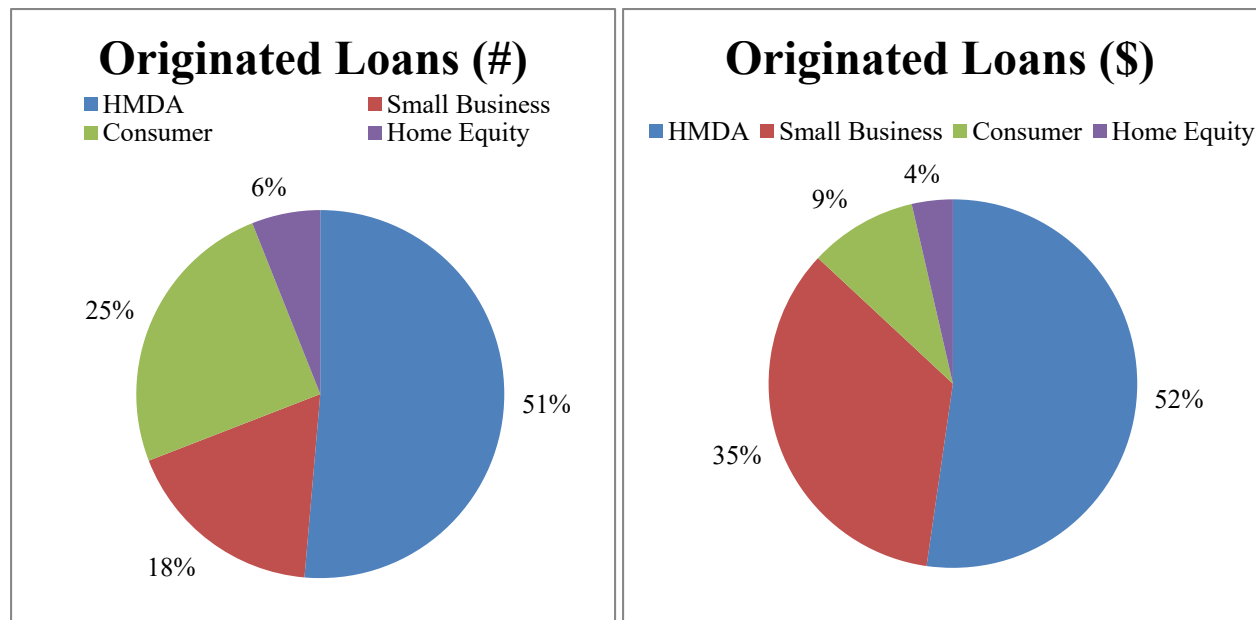
The previous CRA examination conducted September 30, 2013, resulted in an Outstanding performance rating.

### SCOPE OF EXAMINATION

The Portage Community Bank (Portage) Community Reinvestment Act (CRA) performance was evaluated using the interagency intermediate small bank examination procedures under Regulation BB.

Portage’s CRA performance was evaluated based on lending data for the period of January 1, 2013, to June 30, 2018. The loan products evaluated included HMDA, small business, home equity and consumer loans. HMDA loans are comprised of home purchase, refinance, home improvement, and multifamily. Consumer loans are comprised of motor vehicle, other secured, and other unsecured. For the review, HMDA loans were combined due to the lack of volume of each individual loan type. Additionally, there was an insufficient number of small farm loans to analyze during the review period.

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



Based on total loan volume by number and dollar amount and the composition of the loan portfolio, HMDA received the most weight, followed by small business, consumer, and home equity.

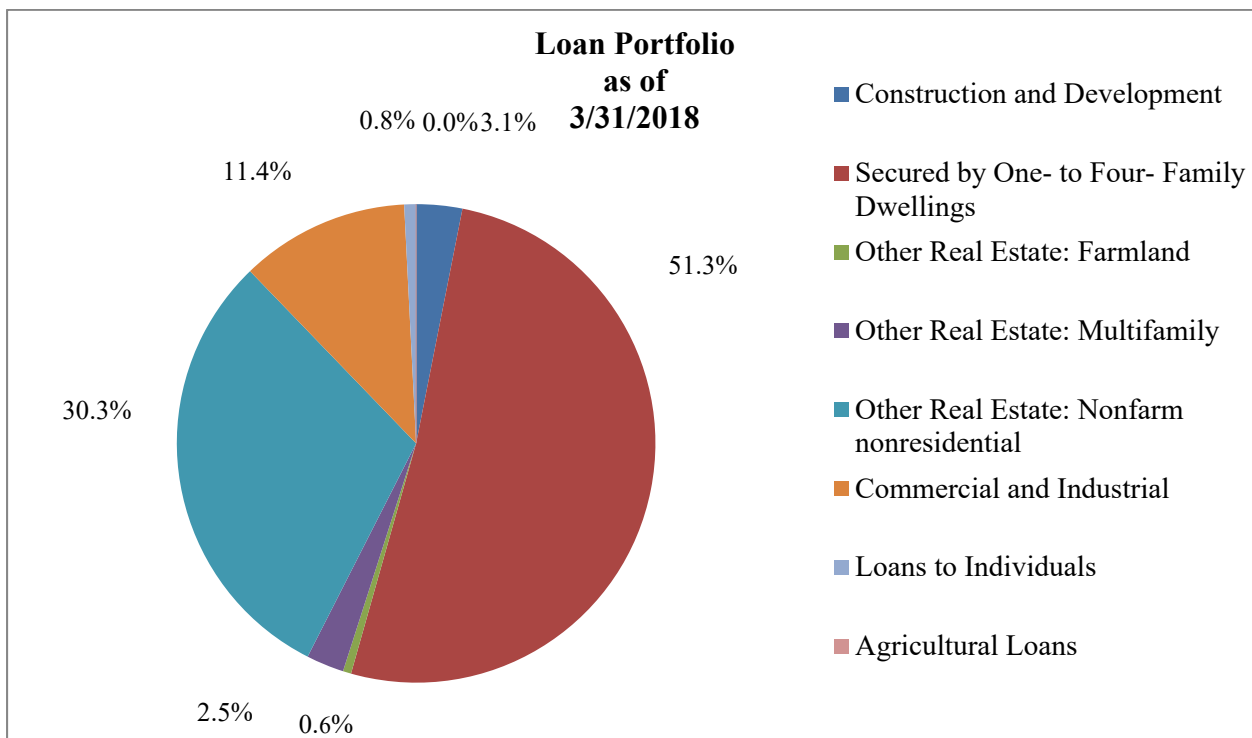
For the purpose of this evaluation, geographic and borrower distribution were weighted equally, since the total assessment area includes a significant number of low-and moderate-income census tracts and low- to moderate-income households.

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

### DESCRIPTION OF INSTITUTION

Portage is the banking subsidiary of Portage Bancshares, Inc. Both the bank and the holding company are located in Ravenna, Ohio. As of June 30, 2018, Portage reported \$330 million in total assets, an increase of 22.2% since the previous CRA evaluation.

Portage has two offices, both with full-service ATMs. The main office is located in Ravenna, Ohio, and is located in a moderate-income tract, while the second office is located in a middle-income tract in Kent, Ohio. Since the previous evaluation, Portage has not opened or closed a branch office. Portage is a full-service retail bank offering deposit accounts, residential mortgages, consumer, commercial, and agricultural loans. The following chart represents the composition of Portage’s loan portfolio as of June 30, 2018.



Portage’s investment portfolio as of June 30, 2018, was \$69.9 million, which represented (22.6%) of total assets. Investments in U.S. Treasuries and Agencies account for (54.5%) of investments, municipal securities comprise (44.2%) of investments, with the remaining (1.4%) comprised of all other investments.

As of June 30, 2018, Portage’s net loans and leases represent 76.2% of total assets. The following table displays the loan portfolio composition and trend as of June 30, 2018.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2018		12/31/2017		12/31/2016	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	7,299	3.1%	6,093	2.7%	6,178	2.8%
Secured by One- to Four- Family Dwellings	120,644	51.3%	117,194	51.9%	111,513	51.2%
Other Real Estate: Farmland	1,313	0.6%	1,350	0.6%	1,647	0.8%
Other Real Estate: Multifamily	5,982	2.5%	5,291	2.3%	6,014	2.8%
Other Real Estate: Nonfarm nonresidential	71,257	30.3%	72,223	32.0%	68,766	31.6%
Commercial and Industrial	26,841	11.4%	22,139	9.8%	21,355	9.8%
Loans to Individuals	1,879	0.8%	1,643	0.7%	2,322	1.1%
Agricultural Loans	18	0.0%	18	0.0%	19	0.0%
<i>Total</i>	<i>\$235,233</i>	<i>100.00%</i>	<i>\$225,951</i>	<i>100.00%</i>	<i>\$217,814</i>	<i>100.00%</i>

\* 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 legal or financial constraints preventing Portage from meeting the credit needs of its assessment area consistent with its asset size, business strategy, resources, and local economy.

## DESCRIPTION OF AKRON, OH MSA 10420

Portage has one assessment area in Ohio, consisting of the entirety of the Akron, OH MSA. Portage and Summit Counties comprise the entirety of the Akron, OH MSA. The bank’s assessment area is a mixture of urban, suburban, and rural areas and includes 170 census tracts comprised of 30 low-income, 34 moderate-income, 68 middle-income and 38 upper-income census tracts. Portage’s main office is located in a moderate-income census tract. The branch is located in a middle-income census tract. None of the middle-income tracts are designated as distressed or underserved.

Summit County has the larger population of the two counties in the assessment area with Akron as the county seat. According to the 2010 U.S. Census Bureau Report, the population in Summit County was 541,781. The majority of Summit County is urban and suburban land use, which could indicate higher level of need for credit in the assessment area.

Portage County is directly east of Summit County with Ravenna as the county seat. Portage County is primarily a mix of forest, agriculture, and suburban areas. Ravenna is the county seat in Portage County. The county had a population of 161,419, according to the 2010 U.S. Census.

As of June 30, 2018, the Federal Deposit Insurance Corporation (FDIC) reported 26 insured financial institutions operating within the assessment area. The FDIC’s market share report indicates that Portage is ranked tenth, holding 2.0% of the market share of deposits.<sup>11</sup> The following table illustrates the deposit market share for the top ten financial institutions in the counties.

#	Financial Institution	Deposit Market Share
1	The Huntington National Bank	28.1%
2	JPMorgan Chase Bank, National Association	15.6%
3	PNC Bank, National Association	13.0%
4	KeyBank National Association	10.7%
5	Fifth Third Bank	6.3%
6	Citizens Bank, National Association	5.2%
7	Third Federal Savings and Loan Association of Cleveland	3.6%
8	New York Community Bank	3.3%
9	U.S. Bank National Association	2.4%
10	Portage Community Bank	2.0%

### **Community Contacts**

Two community contact interviews were conducted to provide additional information regarding

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

credit needs of the local community and context to the demographic and economic characteristics discussed.

One community contact was conducted with an affordable housing organization that serves Portage County. According to the contact, a largely unbanked population continues to be a concern as it can create challenges for obtaining loans with a lack of credit history. There is a need to increase financial literacy amongst all age groups, not just school age individuals in the community. The contact stated that affordable housing continues to be a concern with a need to provide individuals with housing assistance. The contact also noted that several changes in banking personnel in the area makes it challenging to build and maintain working relationships in the communities.

The second contact was with an organization that provides various community services, including resources, support, and educational training to overcome poverty and promote economic self-sufficiency in Summit County. According to the contact, Summit County has a large unbanked population, which creates challenges for obtaining loans with a lack of credit. According to the contact, there is a challenge of relationship building and trust between low- to moderate-income individuals and local banking institutions. The contact observed that this was likely due to higher turnover in the industry. Additionally, the contact noted that there is a need to increase financial literacy in the community.

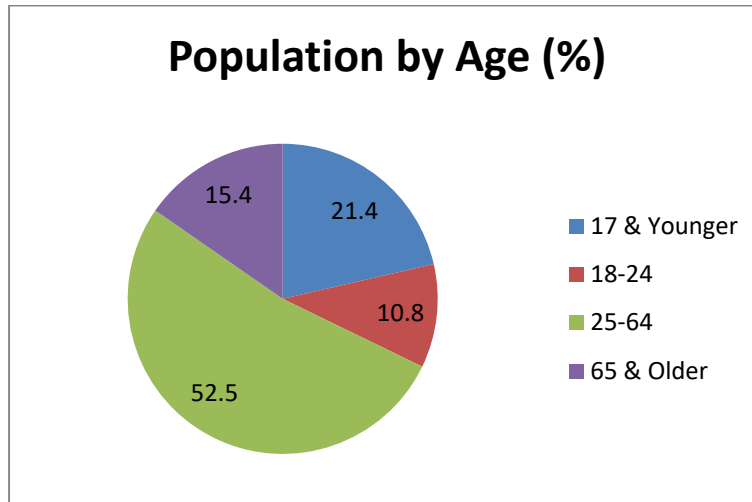
### **Population Characteristics**

According to the 2015 U.S. Census Bureau Report, the total population in the assessment area was 703,744. Of this population, 11.4% reside in low-, 19.7% reside in moderate-, 41.7% reside in middle-, and 27.2% reside in upper-income census tracts.

County	2010 Population	2017 Population	Population Percent Change
Portage	161,419	162,277	0.5%
Summit	541,781	541,228	-0.1%
<b>Total</b>	<b>703,200</b>	<b>703,505</b>	

Additionally, 78.6% of the population is 18 years of age or older, the legal age to enter into a contract. The following chart provides further breakdown of the population by age.





### Income Characteristics

According to data from the U.S. Census, the median family income levels for Portage’s assessment area was \$65,602, which is above Ohio’s median family income of \$62,817. Based on 2017 HUD data, the median family income increased to \$65,700. The 2013 through 2017 estimated median family income levels are detailed in the following table.<sup>2</sup>

**Borrower Income Levels  
Akron, OH - MSA**

HUD Estimated Median Family Income		Low 0 - 49.99%			Moderate 50% - 79.99%			Middle 80% - 119.99%			Upper 120% - & above	
<b>2013</b>	<b>\$64,400</b>	0	-	\$32,199	\$32,200	-	\$51,519	\$51,520	-	\$77,279	\$77,280	- & above
<b>2014</b>	<b>\$62,100</b>	0	-	\$31,049	\$31,050	-	\$49,679	\$49,680	-	\$74,519	\$74,520	- & above
<b>2015</b>	<b>\$66,700</b>	0	-	\$33,349	\$33,350	-	\$53,359	\$53,360	-	\$80,039	\$80,040	- & above
<b>2016</b>	<b>\$66,900</b>	0	-	\$33,449	\$33,450	-	\$53,519	\$53,520	-	\$80,279	\$80,280	- & above
<b>2017</b>	<b>\$65,700</b>	0	-	\$32,849	\$32,850	-	\$52,559	\$52,560	-	\$78,839	\$78,840	- & above

The assessment area contains 281,957 households, of which 178,180 are designated as families. Low- and moderate-income families represent 21.4% and 16.9% of all families in this assessment area, respectively, with 10.6% of families below the poverty level, compared to Ohio’s rate of 11.5%.

According to the 2017 data from the U.S. Census Bureau’s Small Area Income and Poverty Estimates (SAIPE), household poverty rates for Portage and Summit Counties were as follows:<sup>3</sup>

County	2015 Poverty Rate	2016 Poverty Rate	Change
Portage County	13.6%	13.5%	-0.7%
Summit County	14.4%	13.7%	-4.9%

<sup>2</sup> <http://www.huduser.org/portal/datasets/il/il13/index.html>

<sup>3</sup> <https://www.census.gov/did/www/saipe/>

Ohio	14.8%	14.5%	-2.0%
United States	14.7%	14.0%	-4.8%

Both Portage and Summit Counties’ poverty rate was lower than the poverty rate of Ohio and the United States. Although this area’s poverty rates are lower than those for state and national rates, low- and moderate-income people in this area could still encounter difficulty obtaining bank loans due to insufficient financial resources.

**Labor, Employment and Economic Characteristics**

According to the Ohio Development Services Agency, the largest industries by average employment are trade, transportation and utilities; education and health services; and professional and business services. The following table identifies the employment sectors and major employers in the bank’s assessment area, but it is not limited to the following:<sup>4</sup>

County	Primary Employment Sectors	Major Employers
Portage	Trade, Transportation, and Utilities; Manufacturing; Leisure and Hospitality; Education and Health Services; Professional and Business Services	East Manufacturing Corp, Kent City Schools, Kent State University, McMaster-Carr Supply Co, Northeast Ohio Medical, University Parker-Hannifin, Portage County Government, Ravenna City Schools, Robinson Memorial Hospital, Saint Gobain, State of Ohio, Step2 Company
Summit	Trade, Transportation, and Utilities; Education and Health Services; Professional and Business Services; Manufacturing; Leisure and Hospitality	Akron City Schools, Akron General Health System Babcock & Wilcox, Children's Hospital Medical Center, Diebold Inc, FirstEnergy Corp, Goodyear Tire & Rubber Co, Jo-Ann Stores Inc, Signet Jewelers Inc, Summa Health System, University of Akron

The following table shows the 2013 through 2018 average annual unemployment rate for Portage and Summit Counties, Ohio, and the United States.

**Unemployment Rates**  
**Assessment Area: Akron MSA**

Area	Years - Annualized					
	2013	2014	2015	2016	2017	2018
Portage Co.	6.8 (R)	5.0 (R)	4.8 (R)	5.2 (R)	4.7 (R)	4.7 (R)
Summit Co.	6.7 (R)	5.1 (R)	4.8 (R)	5.2 (R)	4.8 (R)	4.7 (R)
<b>Akron, Ohio MSA</b>	<b>6.7 (R)</b>	<b>5.1 (R)</b>	<b>4.8 (R)</b>	<b>5.2 (R)</b>	<b>4.8 (R)</b>	<b>4.7 (R)</b>
<b>Ohio</b>	<b>6.4 (D)</b>	<b>4.9 (D)</b>	<b>4.7 (D)</b>	<b>5.0 (D)</b>	<b>4.5 (D)</b>	<b>4.9 (P)</b>

<sup>4</sup> [http://www.development.ohio.gov/reports/reports\\_countytrends\\_map.htm](http://www.development.ohio.gov/reports/reports_countytrends_map.htm)

National	6.5	5.4	4.8	4.5	3.9	3.9
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Not Seasonally Adjusted  
Data extracted on September 18, 2018  
D: Reflects revised population controls and model re-estimation  
P: Preliminary as of July, 2018  
R: Data were subject to revision on April 20, 2018

The unemployment rates for Portage and Summit Counties were higher than Ohio for 2013 through 2017 and lower in 2018. Portage and Summit Counties, and Ohio as a whole, experienced declines in the rate from 2013 to 2018.

**Housing Characteristics**

There were 313,134 housing units in the assessment area based on the 2015 U.S. Census. Within the assessment area, 60.2% of the units were owner-occupied, 29.9% were rental units, and 10.0% were vacant. The owner-occupied rate is slightly above in comparison to the Ohio rate, where 59.1% of the units were owner-occupied. Additionally, 85.3% are one-to-four family units, 2.3% are mobile homes, and 14.7% are multi-family homes. Of these housing types, 11.7% are located in low-, 20.9% are located in moderate-, 42.2% are located in middle-, and 25.2% are located in upper-income census tracts. These numbers indicate that most of the demand for home mortgage lending would be in middle-income tracts.

According to the 2010 U.S. Census Data, the median age of the housing stock in the assessment area was 55 years, with 25.7% built before 1950. In comparison, the median statewide age is 48 years. However, within the assessment area, the median age of housing stock was 61 years in low-income tracts and 61 years in moderate-income tracts; therefore, it appears there could be a need for home improvement and rehabilitation loans in these lower-income areas.

The median housing value in the assessment area is \$137,907, with an affordability ratio of 23.4%. The higher the affordability ratio, the more affordable a home is considered. The housing affordability ratio is calculated by dividing median household income by median housing value. The housing stock in the assessment area was slightly less affordable than Ohio at 23.5%. Furthermore, based on the 2015 median family income for the assessment area of \$65,602, approximately 41.4% of the homes valued up to \$120,234 in the assessment area would be considered affordable for low-income individuals and 74.3% of the homes valued up to \$192,375 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed, 30-year loan.

According to RealtyTrac<sup>5</sup>, one in every 1,602 properties in Portage County and one in every 1,074 properties in Summit County was in foreclosure in October, 2018. The Portage County ratio is lower and the Summit County ratio is higher than Ohio’s ratio of one in every 1,404 properties.

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<sup>5</sup> [www.realtytrac.com](http://www.realtytrac.com)

<b>Geography Name</b>	<b>Ratio of Properties Receiving Foreclosure Filings in (October, 2018)</b>
Portage County	1:1602
Summit County	1:1074
<b>Ohio</b>	<b>1:1404</b>
<b>United States</b>	<b>1:1989</b>

According to Sperling's Best Places<sup>6</sup>, the median cost of a home in Portage County was \$130,000, which represents an appreciation of 3.4% since the prior year. Compared to the rest of the country, Portage's cost of living is 13.6% lower than the national average. In Summit County, the median home cost is \$143,800 and appreciated 6.0% since the previous year. Compared to the rest of the country, Summit's cost of living is 8.2% lower than the national average.

The median gross rent in the assessment area was \$756, with 47.3% of the rents greater than 30% of renter's income, according to the 2015 Census. The median gross rent in the assessment area was higher than Ohio's of \$730.

The following tables further illustrate the demographics of Portage's assessment area.

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<sup>6</sup> <http://bestplaces.net>

## Combined Demographics Report

Assessment Area(s): Akron MSA - Portage County 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	30	17.6	15,220	8.5	5,424	35.6	38,188	21.4
Moderate-income	34	20	33,998	19.1	5,687	16.7	30,041	16.9
Middle-income	68	40	76,441	42.9	6,193	8.1	37,086	20.8
Upper-income	38	22.4	52,521	29.5	1,589	3	72,865	40.9
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>170</b>	<b>100.0</b>	<b>178,180</b>	<b>100.0</b>	<b>18,893</b>	<b>10.6</b>	<b>178,180</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	36,717	10,803	5.7	29.4	19,224	52.4	6,690	18.2
Moderate-income	65,597	33,335	17.7	50.8	24,429	37.2	7,833	11.9
Middle-income	131,920	84,494	44.9	64	35,347	26.8	12,079	9.2
Upper-income	78,900	59,720	31.7	75.7	14,605	18.5	4,575	5.8
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>313,134</b>	<b>188,352</b>	<b>100.0</b>	<b>60.2</b>	<b>93,605</b>	<b>29.9</b>	<b>31,177</b>	<b>10.0</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	
Low-income	2,601	9.7	2,078	8.8	500	16.4	23	11.3
Moderate-income	3,929	14.7	3,448	14.7	456	14.9	25	12.3
Middle-income	10,379	38.8	9,333	39.7	967	31.7	79	38.9
Upper-income	9,857	36.8	8,650	36.8	1,131	37	76	37.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>26,766</b>	<b>100.0</b>	<b>23,509</b>	<b>100.0</b>	<b>3,054</b>	<b>100.0</b>	<b>203</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>87.8</b>		<b>11.4</b>		<b>.8</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	
Low-income	4	1.4	3	1	1	25	0	0
Moderate-income	23	7.9	22	7.6	1	25	0	0
Middle-income	199	68.2	197	68.4	2	50	0	0
Upper-income	66	22.6	66	22.9	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>292</b>	<b>100.0</b>	<b>288</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>98.6</b>		<b>1.4</b>		<b>.0</b>

2017 FFIEC Census Data and 2017 D&B Information

## Combined Demographics Report

Assessment Area(s): Akron MSA - Portage County 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	24	14.1	12,826	7	4,443	34.6	38,129	20.8	
Moderate-income	38	22.4	36,260	19.7	6,246	17.2	32,682	17.8	
Middle-income	65	38.2	74,699	40.7	5,233	7	40,418	22	
Upper-income	43	25.3	59,811	32.6	1,685	2.8	72,367	39.4	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>170</b>	<b>100.0</b>	<b>183,596</b>	<b>100.0</b>	<b>17,607</b>	<b>9.6</b>	<b>183,596</b>	<b>100.0</b>	
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>							
		<b>Owner-Occupied</b>				<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%	
Low-income	29,127	9,064	4.6	31.1	15,123	51.9	4,940	17	
Moderate-income	69,213	37,357	18.9	54	24,627	35.6	7,229	10.4	
Middle-income	124,380	83,460	42.2	67.1	31,658	25.5	9,262	7.4	
Upper-income	88,454	67,884	34.3	76.7	15,768	17.8	4,802	5.4	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>311,174</b>	<b>197,765</b>	<b>100.0</b>	<b>63.6</b>	<b>87,176</b>	<b>28.0</b>	<b>26,233</b>	<b>8.4</b>	
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>							
		<b>Less Than or = \$1 Million</b>				<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	#	%	#	%	#	%
Low-income	2,129	7.3	1,756	6.7	353	11.5	20	9.4	
Moderate-income	4,558	15.5	3,956	15.2	577	18.8	25	11.7	
Middle-income	10,886	37.1	9,885	37.9	927	30.2	74	34.7	
Upper-income	11,785	40.1	10,482	40.2	1,209	39.4	94	44.1	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>29,358</b>	<b>100.0</b>	<b>26,079</b>	<b>100.0</b>	<b>3,066</b>	<b>100.0</b>	<b>213</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>88.8</b>		<b>10.4</b>		<b>.7</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>							
		<b>Less Than or = \$1 Million</b>				<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	#	%	#	%	#	%
Low-income	1	0.3	1	0.3	0	0	0	0	
Moderate-income	41	13.1	39	12.6	2	50	0	0	
Middle-income	184	58.6	182	58.7	2	50	0	0	
Upper-income	88	28	88	28.4	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>314</b>	<b>100.0</b>	<b>310</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	
<b>Percentage of Total Farms:</b>				<b>98.7</b>		<b>1.3</b>		<b>.0</b>	

2016 FFIEC Census Data and 2016 D&B Information

## Combined Demographics Report

Assessment Area(s): Akron MSA - Portage County 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	24	14.1	12,826	7	4,443	34.6	38,129	20.8
Moderate-income	38	22.4	36,260	19.7	6,246	17.2	32,682	17.8
Middle-income	65	38.2	74,699	40.7	5,233	7	40,418	22
Upper-income	43	25.3	59,811	32.6	1,685	2.8	72,367	39.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>170</b>	<b>100.0</b>	<b>183,596</b>	<b>100.0</b>	<b>17,607</b>	<b>9.6</b>	<b>183,596</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	29,127	9,064	4.6	31.1	15,123	51.9	4,940	17
Moderate-income	69,213	37,357	18.9	54	24,627	35.6	7,229	10.4
Middle-income	124,380	83,460	42.2	67.1	31,658	25.5	9,262	7.4
Upper-income	88,454	67,884	34.3	76.7	15,768	17.8	4,802	5.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>311,174</b>	<b>197,765</b>	<b>100.0</b>	<b>63.6</b>	<b>87,176</b>	<b>28.0</b>	<b>26,233</b>	<b>8.4</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>			<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	#	%	#	%	#
Low-income	2,325	7.2	1,977	6.7	337	11.7	11	8.3
Moderate-income	5,031	15.6	4,475	15.3	535	18.6	21	15.8
Middle-income	11,942	37	11,037	37.7	853	29.7	52	39.1
Upper-income	12,999	40.2	11,806	40.3	1,144	39.9	49	36.8
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>32,297</b>	<b>100.0</b>	<b>29,295</b>	<b>100.0</b>	<b>2,869</b>	<b>100.0</b>	<b>133</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.7</b>		<b>8.9</b>		<b>.4</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>			<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	#	%	#	%	#
Low-income	1	0.3	1	0.3	0	0	0	0
Moderate-income	43	11.7	41	11.3	2	50	0	0
Middle-income	219	59.8	217	59.9	2	50	0	0
Upper-income	103	28.1	103	28.5	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>366</b>	<b>100.0</b>	<b>362</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>98.9</b>		<b>1.1</b>		<b>.0</b>

2015 FFIEC Census Data and 2015 D&B Information

## Combined Demographics Report

Assessment Area(s): Akron MSA - Portage County 2014

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	24	14.1	12,826	7	4,443	34.6	38,129	20.8
Moderate-income	38	22.4	36,260	19.7	6,246	17.2	32,682	17.8
Middle-income	65	38.2	74,699	40.7	5,233	7	40,418	22
Upper-income	43	25.3	59,811	32.6	1,685	2.8	72,367	39.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>170</b>	<b>100.0</b>	<b>183,596</b>	<b>100.0</b>	<b>17,607</b>	<b>9.6</b>	<b>183,596</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	29,127	9,064	4.6	31.1	15,123	51.9	4,940	17
Moderate-income	69,213	37,357	18.9	54	24,627	35.6	7,229	10.4
Middle-income	124,380	83,460	42.2	67.1	31,658	25.5	9,262	7.4
Upper-income	88,454	67,884	34.3	76.7	15,768	17.8	4,802	5.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>311,174</b>	<b>197,765</b>	<b>100.0</b>	<b>63.6</b>	<b>87,176</b>	<b>28.0</b>	<b>26,233</b>	<b>8.4</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>			<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	#	%	#	%	#
Low-income	2,284	7.6	1,891	7.1	305	12	88	9.3
Moderate-income	4,931	16.4	4,271	16.1	498	19.6	162	17.2
Middle-income	11,167	37.2	10,083	38	747	29.4	337	35.8
Upper-income	11,634	38.8	10,292	38.8	987	38.9	355	37.7
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>30,016</b>	<b>100.0</b>	<b>26,537</b>	<b>100.0</b>	<b>2,537</b>	<b>100.0</b>	<b>942</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>88.4</b>		<b>8.5</b>		<b>3.1</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>			<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	#	%	#	%	#
Low-income	1	0.3	1	0.3	0	0	0	0
Moderate-income	42	11.3	40	10.8	2	50	0	0
Middle-income	225	60.3	223	60.4	2	50	0	0
Upper-income	105	28.2	105	28.5	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>373</b>	<b>100.0</b>	<b>369</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>			<b>98.9</b>		<b>1.1</b>		<b>.0</b>	

2014 FFIEC Census Data and 2014 D&B Information



## Combined Demographics Report

Assessment Area(s): Akron MSA - Portage County 2013

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	24	14.1	12,826	7	4,443	34.6	38,129	20.8	
Moderate-income	38	22.4	36,260	19.7	6,246	17.2	32,682	17.8	
Middle-income	65	38.2	74,699	40.7	5,233	7	40,418	22	
Upper-income	43	25.3	59,811	32.6	1,685	2.8	72,367	39.4	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>170</b>	<b>100.0</b>	<b>183,596</b>	<b>100.0</b>	<b>17,607</b>	<b>9.6</b>	<b>183,596</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	29,127	9,064	4.6	31.1	15,123	51.9	4,940	17	
Moderate-income	69,213	37,357	18.9	54	24,627	35.6	7,229	10.4	
Middle-income	124,380	83,460	42.2	67.1	31,658	25.5	9,262	7.4	
Upper-income	88,454	67,884	34.3	76.7	15,768	17.8	4,802	5.4	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>311,174</b>	<b>197,765</b>	<b>100.0</b>	<b>63.6</b>	<b>87,176</b>	<b>28.0</b>	<b>26,233</b>	<b>8.4</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	2,520	7.3	2,117	6.9	297	11.5	106	9.4	
Moderate-income	5,665	16.4	4,942	16	526	20.3	197	17.5	
Middle-income	12,962	37.5	11,763	38.2	788	30.4	411	36.4	
Upper-income	13,378	38.7	11,983	38.9	981	37.8	414	36.7	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>34,525</b>	<b>100.0</b>	<b>30,805</b>	<b>100.0</b>	<b>2,592</b>	<b>100.0</b>	<b>1,128</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>89.2</b>		<b>7.5</b>		<b>3.3</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	1	0.2	1	0.2	0	0	0	0	
Moderate-income	50	10.5	48	10.2	2	66.7	0	0	
Middle-income	289	61	288	61.1	1	33.3	0	0	
Upper-income	134	28.3	134	28.5	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>474</b>	<b>100.0</b>	<b>471</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	
<b>Percentage of Total Farms:</b>				<b>99.4</b>		<b>.6</b>		<b>.0</b>	

2013 FFIEC Census Data and 2013 D&B Information

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Portage’s performance under the lending test is considered satisfactory. The loan-to-deposit ratio is reasonable. The bank made a majority of its loans inside its assessment area. The geographic distribution of lending is reasonable. The borrower distribution of lending is reasonable.

### Loan-to-Deposit Ratio

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

The following table shows Portage’s quarterly LTD ratios for 20 quarters since the previous evaluation, along with the average LTD for the same period.

Loan-to-Deposit Ratios				
AS OF DATE	PORTAGE CMNTY BK	HOMETOWN BK	MIDDLEFIELD BKG CO	CUSTOM PEER
June 30, 2018	86.09	99.36	100.22	99.79
March 31, 2018	81.69	95.26	97.73	96.50
December 31, 2017	81.26	92.88	104.01	98.45
September 30, 2017	81.15	92.00	97.33	94.67
June 30, 2017	82.23	91.38	102.22	96.80
March 31, 2017	78.11	92.09	98.83	95.46
December 31, 2016	82.90	95.84	95.21	95.53
September 30, 2016	83.64	96.84	90.22	93.53
June 30, 2016	87.36	95.89	90.77	93.33
March 31, 2016	82.20	94.69	82.78	88.74
December 31, 2015	87.40	94.62	84.39	89.51
September 30, 2015	89.44	92.77	80.37	86.57
June 30, 2015	90.77	91.55	77.99	84.77
March 31, 2015	89.67	95.62	76.05	85.84
December 31, 2014	91.73	93.77	79.07	86.42
September 30, 2014	89.32	95.13	76.64	85.89
June 30, 2014	88.42	94.41	75.10	84.76
March 31, 2014	85.50	95.83	73.30	84.57
December 31, 2013	84.12	96.71	73.09	84.90
September 30, 2013	84.93	99.15	68.47	83.81
<b>Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation</b>	<b>85.40</b>	<b>94.79</b>	<b>86.19</b>	<b>90.49</b>

Portage’s LTD ratio is reasonable given the bank’s size, financial condition, and assessment area credit needs. The bank has averaged 85.4% over the past 20 quarters of operation and is below the custom peer group average ratio of 90.5%. Since the prior evaluation, the LTD has varied over annual quarters, but no significant variances were noted. This indicates that Portage’s loan origination volume is commensurate with its capacity to lend and is, therefore, considered reasonable.

## Lending in the Assessment Area

Portage's HMDA, small business, home equity and consumer loans were analyzed to determine the volume of lending inside and outside the bank's assessment area. The following table shows the distribution of loans made inside and outside the bank's assessment area and indicates a majority (65.8% by volume and 61.7% by dollar amount) of Portage's loans were made inside its delineated assessment area. Portage's lending in the assessment area is considered reasonable.

### Lending Inside and Outside the Assessment Area

**Exam: Portage Community Bank 2018 Initial**

Loan Type - Description	Inside				Outside				Total			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
HE - Home Equity	83	48.5	6,912	47.7	88	51.5	7,586	52.3	171	100.0	14,498	100.0
MV - Motor Vehicle	21	45.7	160	30.2	25	54.3	369	69.8	46	100.0	528	100.0
OS - Other - Secured	17	54.8	127	33.9	14	45.2	249	66.1	31	100.0	376	100.0
OU - Other - Unsecured	4	57.1	27	47.8	3	42.9	29	52.2	7	100.0	55	100.0
HE - Home Equity	380	81.2	27,573	78.6	88	18.8	7,489	21.4	468	100.0	35,061	100.0
MV - Motor Vehicle	55	87.3	521	85.4	8	12.7	89	14.6	63	100.0	610	100.0
OS - Other - Secured	56	83.6	841	57.3	11	16.4	626	42.7	67	100.0	1,467	100.0
OU - Other - Unsecured	20	87.0	161	90.1	3	13.0	18	9.9	23	100.0	179	100.0
<b>Total Consumer related</b>	<b>636</b>	<b>72.6</b>	<b>36,322</b>	<b>68.8</b>	<b>240</b>	<b>27.4</b>	<b>16,453</b>	<b>31.2</b>	<b>876</b>	<b>100.0</b>	<b>52,775</b>	<b>100.0</b>
CV - Home Purchase - Conventional	112	58.0	16,378	55.3	81	42.0	13,255	44.7	193	100.0	29,633	100.0
FH - Home Purchase - FHA	55	62.5	8,091	65.7	33	37.5	4,215	34.3	88	100.0	12,306	100.0
HI - Home Improvement	20	76.9	1,697	58.4	6	23.1	1,208	41.6	26	100.0	2,905	100.0
MF - Multi-Family Housing	1	50.0	165	39.8	1	50.0	250	60.2	2	100.0	415	100.0
RF - Refinancing	23	79.3	4,734	84.9	6	20.7	845	15.1	29	100.0	5,579	100.0
VH - Home Purchase - VA	2	40.0	241	30.5	3	60.0	548	69.5	5	100.0	789	100.0
CV - Home Purchase - Conventional	389	61.0	52,993	59.4	249	39.0	36,182	40.6	638	100.0	89,175	100.0
FH - Home Purchase - FHA	135	61.1	16,972	62.8	86	38.9	10,068	37.2	221	100.0	27,040	100.0
HI - Home Improvement	27	84.4	1,924	78.7	5	15.6	520	21.3	32	100.0	2,444	100.0
MF - Multi-Family Housing	7	38.9	4,201	39.9	11	61.1	6,319	60.1	18	100.0	10,520	100.0
RF - Refinancing	148	79.6	20,619	76.8	38	20.4	6,241	23.2	186	100.0	26,860	100.0
VH - Home Purchase - VA	11	57.9	2,067	59.1	8	42.1	1,430	40.9	19	100.0	3,497	100.0
<b>Total HMDA related</b>	<b>930</b>	<b>63.8</b>	<b>130,082</b>	<b>61.6</b>	<b>527</b>	<b>36.2</b>	<b>81,081</b>	<b>38.4</b>	<b>1,457</b>	<b>100.0</b>	<b>211,163</b>	<b>100.0</b>
SB - Small Business	58	36.5	10,041	29.2	101	63.5	24,342	70.8	159	100.0	34,383	100.0
SB - Small Business	242	70.3	72,872	69.0	102	29.7	32,667	31.0	344	100.0	105,539	100.0
<b>Total Small Bus. related</b>	<b>300</b>	<b>59.6</b>	<b>82,913</b>	<b>59.3</b>	<b>203</b>	<b>40.4</b>	<b>57,009</b>	<b>40.7</b>	<b>503</b>	<b>100.0</b>	<b>139,922</b>	<b>100.0</b>
<b>TOTAL LOANS</b>	<b>1,866</b>	<b>65.8</b>	<b>249,317</b>	<b>61.7</b>	<b>970</b>	<b>34.2</b>	<b>154,543</b>	<b>38.3</b>	<b>2,836</b>	<b>100.0</b>	<b>403,860</b>	<b>100.0</b>

## **Geographic Distribution of Lending**

Portage's geographic distribution of loans reflects a reasonable dispersion throughout the assessment area. It is noted that there were some lending gaps identified throughout the assessment area. Specifically, there was no lending in 13 low-income census tracts; 13 moderate-income census tracts; 6 middle-income census tracts; and 7 upper-income census tracts. While there were gaps, 52.4% of housing in low-income tracts and 37.2% of housing in moderate-income tracts were rental units. In addition, in the low- and moderate-income tracts with no lending, there was a combined vacancy rate of 30.2%. The assessment area is competitive, and Portage holds only 2.0% of the market share. Portage's main office and only branch are geographically farther from the majority of low- and moderate- income tracts in the assessment area, making it difficult to lend in all of its assessment area tracts given the bank's retail branch presence. Although there were a number of lending gaps, the geographic distribution for HMDA loans is reasonable and is also reasonable for small business loans, home equity, and consumer loans. Therefore, the overall geographic distribution of lending is reasonable.

### ***HMDA Lending***

During the review period, Portage originated a total of 1,261 HMDA loans in the assessment area, which is comprised of 984 home purchase, 202 refinance loans, 55 home improvement, and 20 multi-family loans. Of the 1,261 loans, 15 were made in low-, 196 were made in moderate-, 801 were made in middle-, and 249 were made in upper-income census tracts. Portage's performance was compared to the number of owner-occupied housing units in the assessment area (proxy) and aggregate lending data. Overall, the geographic distribution of HMDA lending is considered reasonable.

#### *2013*

Portage originated 1.2% of its HMDA loans in low-income tracts, which was well below the proxy of 4.6% and below aggregate at 2.0%. HMDA lending in low-income tracts is poor. In moderate-income tracts, Portage originated 13.5% of its HMDA loans, which was below the proxy at 18.9%, but slightly above aggregate at 13.1%. HMDA lending in moderate-income tracts is reasonable. HMDA lending in middle income tracts was 61.5%, which was above the proxy at 42.2% and aggregate at 41.3%. HMDA lending in upper-income tracts at 23.8% was below the proxy and aggregate at 34.3% and 43.6%, respectively.

#### *2014*

Portage originated 1.4% of its HMDA loans in low-income tracts, which was well below the proxy of 4.6% and below aggregate at 2.0%. HMDA lending in low-income tracts is poor. In moderate-income tracts, Portage originated 15.5% of its HMDA loans, which was slightly below the proxy at 18.9%, but it was slightly above aggregate at 13.9%. HMDA lending in moderate-income tracts is reasonable. HMDA lending in middle income tracts was 63.5%, which was above the proxy at 42.2% and aggregate at 42.9%. HMDA lending in upper-income tracts at 19.6% was well below the proxy and aggregate at 34.3% and 41.2%, respectively.

### 2015

Portage originated 1.2% of its HMDA loans in low-income tracts, which was significantly below the proxy of 4.6% and below aggregate at 2.1%. HMDA lending in low-income tracts is poor. In moderate-income tracts, Portage originated 13.6% of its HMDA loans, which was below the proxy at 18.9%, but slightly above aggregate at 13.4%. HMDA lending in moderate-income tracts is reasonable. HMDA lending in middle income tracts was 63.5%, which was above the proxy at 42.2% and aggregate at 42.9%. HMDA lending in upper-income tracts at 21.1% was below the proxy and well below aggregate at 34.3% and 43.0%, respectively.

### 2016

Portage originated 1.1% of its HMDA loans in low-income tracts, which was significantly below the proxy of 4.6% and below aggregate at 1.8%. HMDA lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 15.8% of its HMDA loans, which was slightly below the proxy at 18.9%, but slightly above aggregate at 13.9%. HMDA lending in moderate-income tracts is reasonable. HMDA lending in middle income tracts was 60.0%, which was above the proxy at 42.2% and aggregate at 42.0%. HMDA lending in upper-income tracts at 23.0% was below the proxy and aggregate at 34.3% and 42.3%, respectively.

### 2017

Portage originated 1.1% of its HMDA loans in low-income tracts, which was significantly below the proxy of 5.7% and well below aggregate at 3.8%. HMDA lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 18.7% of its HMDA loans, which was slightly above the proxy at 17.7% and aggregate at 15.9%. HMDA lending in moderate-income tracts is excellent. HMDA lending in middle-income tracts was 68.2%, which was well above proxy at 44.9% and aggregate at 44.9%. HMDA lending in upper-income tracts at 12.0% was below the proxy and aggregate at 31.7% and 35.4%, respectively.

### ***Small Business Lending***

During the review period, Portage originated a total of 383 small business loans in the assessment area. Of the 383 loans, 13 were made in low-, 97 were made in moderate-, 206 were made in middle-, and 67 were made in upper-income census tracts. Portage's performance was compared to proxy, which is the number of businesses within the assessment area. Overall, the geographic distribution of small business lending is considered reasonable.

### 2013

Portage originated 1.5% of its small business loans in low-income tracts, which was significantly below the proxy of 7.3%. Small business lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 28.4% of its small business loans, which was well above the proxy at 16.4%. Small business lending in moderate-income tracts is excellent. Small business lending in middle income tracts was 52.2%, which was above the proxy at 37.5%. Small business lending in upper-income tracts at 17.9% was well below the proxy of 38.7%.

### 2014

Portage originated 3.9% of its small business loans in low-income tracts, which was below the proxy of 7.6%. Small business lending in low-income tracts is reasonable. In moderate-income tracts, Portage originated 26.0% of its small business loans, which was well above the proxy at 16.4%. Small business lending in moderate-income tracts is excellent. Small business lending in middle-income tracts was 46.8%, which was above the proxy at 37.2%. Small business lending in upper-income tracts at 23.4% was below the proxy of 38.8%.

### 2015

Portage originated 8.3% of its small business loans in low-income tracts, which was slightly above the proxy of 7.2%. Small business lending in low-income tracts is excellent. In moderate-income tracts, Portage originated 25.0% of its small business loans, which was well above the proxy at 15.6%. Small business lending in moderate-income tracts is excellent. Small business lending in middle-income tracts was 50.0%, which was above the proxy at 37.0%. Small business lending in upper-income tracts at 16.7% was well below the proxy of 40.2%.

### 2016

Portage originated 1.3% of its small business loans in low-income tracts, which was significantly below the proxy of 7.3%. Small business lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 23.4% of its small business loans, which was well above the proxy at 15.5%. Small business lending in moderate-income tracts is excellent. Small business lending in middle-income tracts was 62.3%, which was well above the proxy at 37.1%. Small business lending in upper-income tracts at 13.0% was well below the proxy of 40.1%.

### 2017

Portage originated 1.3% of its small business loans in low-income tracts, which was significantly below the proxy of 9.7%. Small business lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 24.4% of its small business loans, which was well above the proxy at 14.7%. Small business lending in moderate-income tracts is excellent. Small business lending in middle income tracts was 57.7%, which was above the proxy at 38.8%. Small business lending in upper-income tracts at 16.7% was well below the proxy of 36.8%.

### ***Home Equity Lending***

During the review period, Portage originated a total of 537 home equity loans in the assessment area. Of the 537 loans, none were made in low-, 110 were made in moderate-, 337 were made in middle-, and 90 were made in upper-income census tracts. Portage's performance was compared to proxy, which is the number of owner-occupied housing units in the assessment area. Overall, the geographic distribution of home equity lending is considered reasonable.

*2013*

Portage originated 0.0% of its home equity loans in low-income tracts, which was significantly below the proxy of 4.6%. Home equity lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 23.2% of its home equity loans, which was slightly above the proxy at 18.9%. Home equity lending in moderate-income tracts is excellent. Home equity lending in middle-income tracts was 56.5%, which was above the proxy at 42.2%. Home equity lending in upper-income tracts at 20.3% was below the proxy of 34.3%.

*2014*

Portage originated 0.0% of its home equity loans in low-income tracts, which was significantly below the proxy of 4.6%. Home equity lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 27.7% of its home equity loans, which was above the proxy at 18.9%. Home equity lending in moderate-income tracts is excellent. Home equity lending in middle income tracts was 58.5%, which was above the proxy at 42.2%. Home equity lending in upper-income tracts at 13.8% was well below the proxy of 34.3%.

*2015*

Portage originated 0.0% of its home equity loans in low-income tracts, which was significantly below the proxy of 4.6%. Home equity lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 22.4% of its home equity loans, which was slightly above the proxy at 18.9%. Home equity lending in moderate-income tracts is excellent. Home equity lending in middle-income tracts was 59.9%, which was above the proxy at 42.2%. Home equity lending in upper-income tracts at 17.7% was below the proxy of 34.3%.

*2016*

Portage originated 0.0% of its home equity loans in low-income tracts, which was significantly below the proxy of 4.6%. Home equity lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 16.7% of its home equity loans, which was slightly below the proxy at 18.9%. Home equity lending in moderate-income tracts is reasonable. Home equity lending in middle-income tracts was 61.1%, which was above the proxy at 42.2%. Home equity lending in upper-income tracts at 22.2% was below the proxy of 34.3%.

*2017*

Portage originated 0.0% of its home equity loans in low-income tracts, which was significantly below the proxy of 5.7%. Home equity lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 13.9% of its home equity loans, which was slightly below the proxy at 17.7%. Home equity lending in moderate-income tracts is reasonable. Home equity lending in middle-income tracts was 77.2%, which was well above the proxy at 44.9%. Home equity lending in upper-income tracts at 8.9% was well below the proxy of 31.7%.

### *Consumer Lending*

During the review period, Portage originated a total of 192 consumer loans in the assessment area. Of the 192 loans, one was made in low-, 52 were made in moderate-, 111 were made in middle-, and 28 were made in upper-income census tracts. Portage's performance was compared to proxy, which is the number of households in the assessment area. Overall, the geographic distribution of home equity lending is considered reasonable.

#### *2013*

Portage originated 0.0% of its consumer loans in low-income tracts, which was significantly below the proxy of 8.5%. Consumer lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 14.3% of its consumer loans, which was below the proxy at 21.8%. Consumer lending in moderate-income tracts is reasonable. Consumer lending in middle-income tracts was 78.6%, which was significantly above the proxy at 40.4%. Consumer lending in upper-income tracts at 7.1% was significantly below the proxy of 29.4%.

#### *2014*

Portage originated 0.0% of its consumer loans in low-income tracts, which was significantly below the proxy of 8.5%. Consumer lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 34.3% of its consumer loans, which was well above the proxy at 21.8%. Consumer lending in moderate-income tracts is excellent. Consumer lending in middle-income tracts was 51.4%, which was above the proxy at 40.4%. Consumer lending in upper-income tracts at 14.3% was well below the proxy of 29.4%.

#### *2015*

Portage originated 2.5% of its consumer loans in low-income tracts, which was well below the proxy of 8.5%. Consumer lending in low-income tracts is poor. In moderate-income tracts, Portage originated 22.5% of its consumer loans, which was slightly above the proxy at 21.8%. Consumer lending in moderate-income tracts is excellent. Consumer lending in middle-income tracts was 45.0%, which was slightly above the proxy at 40.4%. Consumer lending in upper-income tracts at 30.0% was slightly above the proxy of 29.4%.

#### *2016*

Portage originated 0.0% of its consumer loans in low-income tracts, which was significantly below the proxy of 8.5%. Consumer lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 24.4% of its consumer loans, which was slightly above the proxy at 21.8%. Consumer lending in moderate-income tracts is excellent. Consumer lending in middle-income tracts was 63.4%, which was well above the proxy at 40.4%. Consumer lending in upper-income tracts at 12.2% was well below the proxy of 29.4%.



2017

Portage originated 0.0% of its consumer loans in low-income tracts, which was significantly below the proxy of 10.6%. Consumer lending in low-income tracts is very poor. In moderate-income tracts, Portage originated 35.4% of its consumer loans, which was well above the proxy at 20.5%. Consumer lending in moderate-income tracts is excellent. Consumer lending in middle-income tracts was 56.3%, which was above the proxy at 42.5%. Consumer lending in upper-income tracts at 8.3% was well below the proxy of 26.4%.

### **Borrower Distribution of Lending**

The borrower distribution for HMDA, small business, and home equity loans reflects a reasonable penetration among individuals and businesses of different income levels and revenue sizes. The borrower distribution for consumer loans is excellent. Therefore, the overall borrower distribution of loans is considered reasonable based on borrower's income and for businesses of different revenue sizes.

### ***HMDA Lending***

Of the 1261 HMDA loans, 122 were made to low-, 286 were made to moderate-, 330 were made to middle-, 422 were made to upper-income borrowers, and 101 loans were made to borrowers of unknown income. Portage's performance was compared to the income levels of families in the assessment area (proxy) and aggregate lending data. Overall, the borrower distribution of HMDA lending is considered reasonable.

2013

Portage originated 9.9% of its HMDA loans to low-income borrowers which was well below the proxy of 20.8% however above the aggregate at 8.7%. HMDA lending to low-income borrowers is poor. Lending to moderate-income borrowers at 22.6% was above the proxy at 17.8%, and above aggregate at 18.2%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 24.2% was above the proxy at 22.0% and aggregate at 21.7%. Lending to upper-income borrowers at 34.9% was slightly below the proxy and aggregate at 39.4% and 90.6%, respectively.

2014

Portage originated 12.8% of its HMDA loans to low-income borrowers, which was below the proxy of 20.8%. However, this lending was above the aggregate at 8.6%. HMDA lending to low-income borrowers is reasonable. Lending to moderate-income borrowers at 19.2% was slightly above the proxy at 17.8%, and it was also slightly above aggregate at 18.4%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 26.5% was slightly above the proxy at 22.0% and aggregate at 36.8%. Lending to upper-income borrowers at 33.8% was slightly below the proxy and aggregate at 39.4% and 36.8%, respectively.

### 2015

Portage originated 12.4% of its HMDA loans to low-income borrowers, which was below the proxy of 20.8%. However, this lending was above the aggregate at 9.0%. HMDA lending to low-income borrowers is reasonable. Lending to moderate-income borrowers at 23.1% was above the proxy at 17.8% and above aggregate at 18.6%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 28.5% was above the proxy at 22.0% and aggregate at 20.5%. Lending to upper-income borrowers at 30.2% was slightly below the proxy and aggregate at 39.4% and 33.5%, respectively.

### 2016

Portage originated 9.1% of its HMDA loans to low-income borrowers, which was well below the proxy of 20.8%. However, this lending was slightly above the aggregate at 8.8%. HMDA lending to low-income borrowers is poor. Lending to moderate-income borrowers at 24.9% was above the proxy at 17.8% and above aggregate at 18.5%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 29.4% was above the proxy at 22.0% and aggregate at 20.4%. Lending to upper-income borrowers at 26.8% was below the proxy and aggregate at 39.4% and 35.1%, respectively.

### 2017

Portage originated 5.3% of its HMDA loans to low-income borrowers, which was significantly below the proxy of 21.4% and below the aggregate at 8.2%. HMDA lending to low-income borrowers is very poor. Lending to moderate-income borrowers at 23.0% was above the proxy at 16.9%, and it was slightly above aggregate at 19.2%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 22.6% was slightly above the proxy at 20.8% and aggregate at 20.6%. Lending to upper-income borrowers at 41.0% was well below the proxy and aggregate at 40.9% and 36.6%, respectively.

### ***Small Business Lending***

During the review period, Portage originated a total of 383 small business loans in the assessment area for which business revenues were reported. Of these 383 loans, 250 (65.3%) were to small businesses with revenues of \$1 million or less. Loan amount was also considered in addition to revenue, as smaller loans are generally commensurate with the borrower needs of smaller businesses. According to lending data, 53.8% of loans were extended in an amount of \$100,000 or less; 24.8% of business loans were for amounts greater than \$100,000 but less than or equal to \$250,000; and 15.1% of business loans were for amounts greater than \$250,000 but less than or equal to \$1 million. Lastly, only 6.3% of Portage's business loans were for amounts greater than \$1 million. Portage's performance was compared to the percentage of businesses in the assessment area with revenue sizes of less than a million (proxy). Overall, the distribution of loans based on the revenue size for small business lending is considered reasonable.

2013

Portage originated 70.1% of its small business loans to businesses with revenue sizes of \$1 million dollars, which was below proxy at 89.2%. Lending to small businesses is reasonable.

2014

Portage originated 68.8% of its small business loans to businesses with revenue sizes of \$1 million dollars, which was below proxy at 88.4%. Lending to small businesses is reasonable.

2015

Portage originated 59.5% of its small business loans to businesses with revenue sizes of \$1 million dollars, which was below proxy at 90.7%. Lending to small businesses is reasonable.

2016

Portage originated 63.6% of its small business loans to businesses with revenue sizes of \$1 million dollars, which was below proxy at 88.8%. Lending to small businesses is reasonable.

2017

Portage originated 65.4% of its small business loans to businesses with revenue sizes of \$1 million dollars, which was below proxy at 87.8%. Lending to small businesses is reasonable.

### ***Home Equity Lending***

Of the 537 home equity loans, 78 were made to low-, 110 were made to moderate-, 124 were made to middle-, 223 were made to upper-income borrowers; and 2 loans were made to borrowers of unknown income. Portage's performance was compared to the income levels of families in the assessment area (proxy). Overall, the borrower distribution of home equity lending is considered reasonable.

2013

Portage originated 17.4% of its home equity loans to low-income borrowers, which was slightly below the proxy of 20.8%. Home equity lending to low-income borrowers is reasonable. Lending to moderate-income borrowers at 17.4% was slightly below the proxy at 17.8%. Lending to moderate-income borrowers is reasonable. Lending to middle-income borrowers at 24.6% was slightly above the proxy at 22.0%. Lending to upper-income borrowers at 40.6% was slightly above the proxy at 39.4%.

2014

Portage originated 24.5% of its home equity loans to low-income borrowers, which was slightly above the proxy of 20.8%. Home equity lending to low-income borrowers is excellent. Lending to

moderate-income borrowers at 20.2% was slightly above the proxy at 17.8%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 14.9% was below the proxy at 22.0%. Lending to upper-income borrowers at 40.4% was slightly above the proxy at 39.4%.

### *2015*

Portage originated 9.5% of its home equity loans to low-income borrowers, which was well below the proxy of 20.8%. Home equity lending to low-income borrowers is poor. Lending to moderate-income borrowers at 22.4% was above the proxy at 17.8%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 21.8% was slightly below the proxy at 22.0%. Lending to upper-income borrowers at 46.3% was slightly above the proxy at 39.4%.

### *2016*

Portage originated 12.7% of its home equity loans to low-income borrowers, which was below the proxy of 20.8%. Home equity lending to low-income borrowers is reasonable. Lending to moderate-income borrowers at 23.0% was above the proxy at 17.8%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 31.7% was above the proxy at 22.0%. Lending to upper-income borrowers at 31.0% was slightly below the proxy at 39.4%.

### *2017*

Portage originated 12.9% of its home equity loans to low-income borrowers, which was below the proxy of 21.4%. Home equity lending to low-income borrowers is reasonable. Lending to moderate-income borrowers at 16.8% was slightly below the proxy at 16.9%. Lending to moderate-income borrowers is reasonable. Lending to middle-income borrowers at 20.8% was at proxy at 20.8%. Lending to upper-income borrowers at 49.5% was slightly above the proxy at 40.9%.

## ***Consumer Lending***

Of the 192 consumer loans, 71 were made to low-, 52 were made to moderate-, 41 were made to middle-, 26 were made to upper-income borrowers, and 2 loans were made to borrowers of unknown income. Portage's performance was compared to the income levels of households in the assessment area (proxy). Overall, the borrower distribution of consumer lending is considered excellent.

### *2013*

Portage originated 46.4% of its consumer loans to low-income borrowers, which was significantly above the proxy of 24.2%. Consumer lending to low-income borrowers is excellent. Lending to moderate-income borrowers at 17.9% was slightly above the proxy at 15.8%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 25.0% was above the proxy at 18.2%. Lending to upper-income borrowers at 10.7% was well below the proxy at 41.8%.

### *2014*

Portage originated 54.3% of its consumer loans to low-income borrowers, which was significantly above the proxy of 24.2%. Consumer lending to low-income borrowers is excellent. Lending to moderate-income borrowers at 14.3% was slightly below the proxy at 15.8%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 17.1% was slightly below the proxy at 18.2%. Lending to upper-income borrowers at 14.3% was well below the proxy at 41.8%.

### *2015*

Portage originated 30.0% of its consumer loans to low-income borrowers, which was slightly above the proxy of 24.2%. Consumer lending to low-income borrowers is excellent. Lending to moderate-income borrowers at 50.0% was significantly above the proxy at 15.8%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 12.5% was below the proxy at 18.2%. Lending to upper-income borrowers at 7.5% was significantly below the proxy at 41.8%.

### *2016*

Portage originated 29.3% of its consumer loans to low-income borrowers, which was slightly above the proxy of 24.2%. Consumer lending to low-income borrowers is excellent. Lending to moderate-income borrowers at 26.8% was well above the proxy at 15.8%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 24.4% was above the proxy at 18.2%. Lending to upper-income borrowers at 17.1% was well below the proxy at 41.8%.

### *2017*

Portage originated 31.3% of its consumer loans to low-income borrowers, which was above the proxy of 24.8%. Consumer lending to low-income borrowers is excellent. Lending to moderate-income borrowers at 22.9% was above the proxy at 15.7%. Lending to moderate-income borrowers is excellent. Lending to middle-income borrowers at 27.1% was well above the proxy at 17.7%. Lending to upper-income borrowers at 16.7% was well below the proxy at 41.8%.

### **Response to Consumer Complaints**

No CRA-related complaints were filed against Portage during the evaluation period.

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

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified during this evaluation period.

### **Community Development Test**

Portage is rated satisfactory under the community development test. The bank's community development performance demonstrates an adequate responsiveness to the community development needs of its assessment area through community development lending, qualified investments, and community development services, as appropriate, considering Portage's capacity and the need and availability of such opportunities in the assessment area.

### ***Community Development Lending***

Portage originated four community development loans that benefited the assessment area during the evaluation period totaling \$4.3 million, supporting affordable housing and community services.

### ***Qualified Investments***

Portage had no qualifying community development investments.

In addition, Portage made qualified donations in the review period totaling \$12,384 to support 13 organizations that provide community services targeted to low- and moderate-income individuals, affordable housing, and economic development.

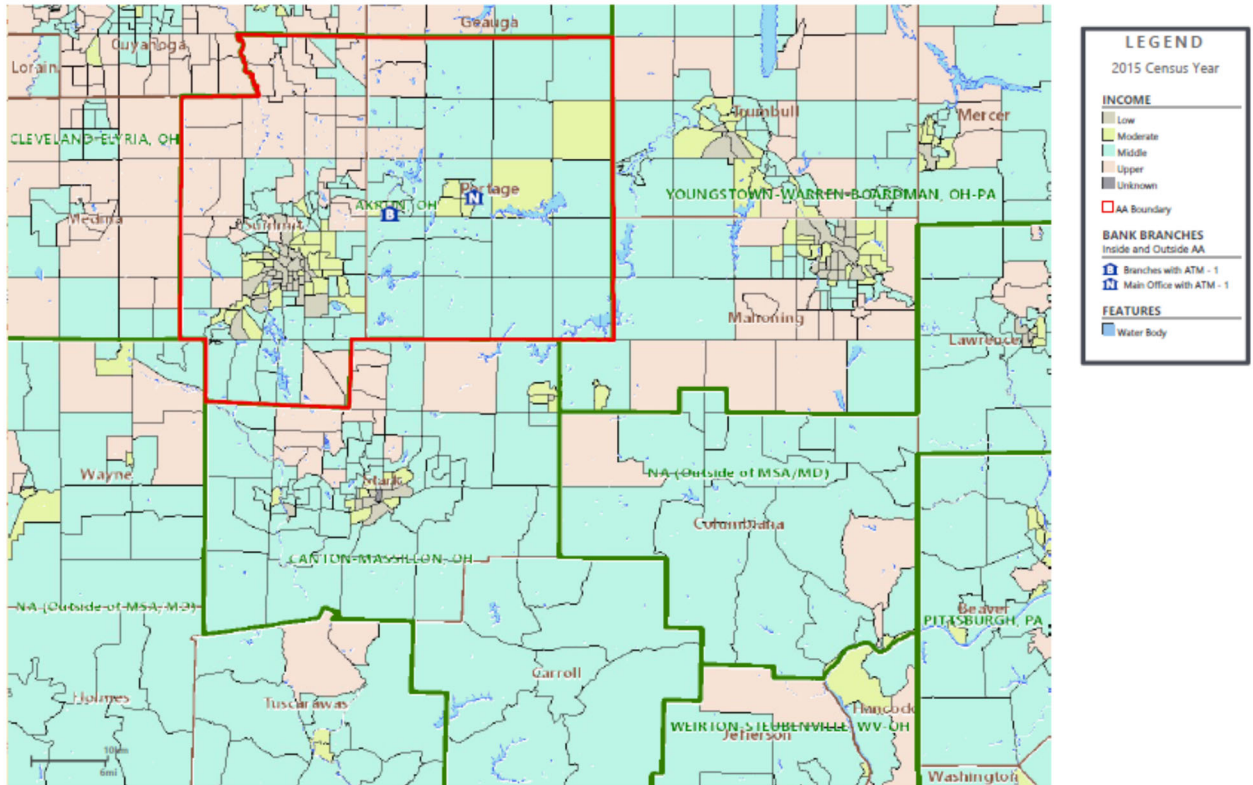
### ***Community Development Services***

Portage provided 739 hours of community development services. The services included providing financial services, financial literacy classes through partnerships with local schools, and financial expertise through its involvement with community development organizations. The community development services provided are responsive to the needs noted by community contacts.

# APPENDIX A

## ASSESSMENT AREA MAP

Assessment Area: Portage Community Bank



**APPENDIX B**

**LENDING TABLES**  
**HMDA Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group :Akron MSA - Portage County 2017

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	2	0.9%	82	0.2%	12	5.2%	1,199	3.5%
Moderate	43	18.7%	4,177	12.4%	56	24.3%	6,107	18.1%
Low/Moderate Total	45	19.6%	4,259	12.6%	68	29.6%	7,306	21.6%
Middle	154	67.0%	23,925	70.8%	57	24.8%	7,744	22.9%
Upper	31	13.5%	5,612	16.6%	93	40.4%	17,443	51.6%
Unknown	0	0.0%	0	0.0%	12	5.2%	1,303	3.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	230	100.0%	33,796	100.0%	230	100.0%	33,796	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	2	7.1%	220	4.0%
Moderate	6	21.4%	616	11.3%	7	25.0%	766	14.1%
Low/Moderate Total	6	21.4%	616	11.3%	9	32.1%	986	18.1%
Middle	20	71.4%	4,449	81.8%	4	14.3%	475	8.7%
Upper	2	7.1%	375	6.9%	10	35.7%	1,606	29.5%
Unknown	0	0.0%	0	0.0%	5	17.9%	2,373	43.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	5,440	100.0%	28	100.0%	5,440	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	1	4.3%	121	4.3%
Moderate	3	13.0%	151	5.4%	2	8.7%	13	0.5%
Low/Moderate Total	3	13.0%	151	5.4%	3	13.0%	134	4.8%
Middle	19	82.6%	2,542	91.0%	3	13.0%	39	1.4%
Upper	1	4.3%	100	3.6%	13	56.5%	1,328	47.5%
Unknown	0	0.0%	0	0.0%	4	17.4%	1,292	46.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	2,793	100.0%	23	100.0%	2,793	100.0%
<b>Multi-Family</b>								
Low	1	50.0%	250	60.2%	0	0.0%	0	0.0%
Moderate	1	50.0%	165	39.8%	0	0.0%	0	0.0%
Low/Moderate Total	2	100.0%	415	100.0%	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%	2	100.0%	415	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	415	100.0%	2	100.0%	415	100.0%
<b>HMDA Totals</b>								
Low	3	1.1%	332	0.8%	15	5.3%	1,540	3.6%
Moderate	53	18.7%	5,109	12.0%	65	23.0%	6,886	16.2%
Low/Moderate Total	56	19.8%	5,441	12.8%	80	28.3%	8,426	19.9%
Middle	193	68.2%	30,916	72.8%	64	22.6%	8,258	19.5%
Upper	34	12.0%	6,087	14.3%	116	41.0%	20,377	48.0%
Unknown	0	0.0%	0	0.0%	23	8.1%	5,383	12.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	283	100.0%	42,444	100.0%	283	100.0%	42,444	100.0%

\*Information based on 2015 ACS data



**HMDA Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group :Akron MSA - Portage County 2016

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	1	0.5%	83	0.3%	18	8.5%	1,364	4.8%
Moderate	32	15.0%	3,152	11.1%	56	26.3%	6,166	21.7%
Low/Moderate Total	33	15.5%	3,235	11.4%	74	34.7%	7,530	26.5%
Middle	126	59.2%	17,119	60.2%	67	31.5%	9,468	33.3%
Upper	54	25.4%	8,061	28.4%	53	24.9%	8,986	31.6%
Unknown	0	0.0%	0	0.0%	19	8.9%	2,431	8.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	213	100.0%	28,415	100.0%	213	100.0%	28,415	100.0%
	<b>Refinance</b>							
Low	1	2.9%	292	5.9%	3	8.8%	320	6.4%
Moderate	7	20.6%	828	16.7%	6	17.6%	857	17.2%
Low/Moderate Total	8	23.5%	1,120	22.5%	9	26.5%	1,177	23.7%
Middle	20	58.8%	2,756	55.4%	8	23.5%	897	18.0%
Upper	6	17.6%	1,096	22.0%	15	44.1%	2,473	49.7%
Unknown	0	0.0%	0	0.0%	2	5.9%	425	8.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	34	100.0%	4,972	100.0%	34	100.0%	4,972	100.0%
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	3	21.4%	132	10.3%
Moderate	2	14.3%	17	1.3%	4	28.6%	78	6.1%
Low/Moderate Total	2	14.3%	17	1.3%	7	50.0%	210	16.4%
Middle	11	78.6%	1,249	97.7%	3	21.4%	216	16.9%
Upper	1	7.1%	12	0.9%	3	21.4%	802	62.8%
Unknown	0	0.0%	0	0.0%	1	7.1%	50	3.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	1,278	100.0%	14	100.0%	1,278	100.0%
	<b>Multi-Family</b>							
Low	1	25.0%	1,282	34.9%	0	0.0%	0	0.0%
Moderate	1	25.0%	1,650	44.9%	0	0.0%	0	0.0%
Low/Moderate Total	2	50.0%	2,932	79.8%	0	0.0%	0	0.0%
Middle	2	50.0%	744	20.2%	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%	4	100.0%	3,676	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	3,676	100.0%	4	100.0%	3,676	100.0%
	<b>HMDA Totals</b>							
Low	3	1.1%	1,657	4.3%	24	9.1%	1,816	4.7%
Moderate	42	15.8%	5,647	14.7%	66	24.9%	7,101	18.5%
Low/Moderate Total	45	17.0%	7,304	19.1%	90	34.0%	8,917	23.3%
Middle	159	60.0%	21,868	57.0%	78	29.4%	10,581	27.6%
Upper	61	23.0%	9,169	23.9%	71	26.8%	12,261	32.0%
Unknown	0	0.0%	0	0.0%	26	9.8%	6,582	17.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	265	100.0%	38,341	100.0%	265	100.0%	38,341	100.0%

\*Information based on 2010 ACS data

**HMDA Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group :Akron MSA - Portage County 2015

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	3	1.5%	182	0.7%	25	12.5%	2,194	8.0%
Moderate	28	14.0%	2,425	8.9%	47	23.5%	5,140	18.8%
Low/Moderate Total	31	15.5%	2,607	9.5%	72	36.0%	7,334	26.8%
Middle	126	63.0%	16,209	59.3%	61	30.5%	7,723	28.2%
Upper	43	21.5%	8,539	31.2%	60	30.0%	11,418	41.7%
Unknown	0	0.0%	0	0.0%	7	3.5%	880	3.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	200	100.0%	27,355	100.0%	200	100.0%	27,355	100.0%
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	3	10.7%	309	7.9%
Moderate	2	7.1%	224	5.7%	3	10.7%	380	9.8%
Low/Moderate Total	2	7.1%	224	5.7%	6	21.4%	689	17.7%
Middle	22	78.6%	2,935	75.3%	7	25.0%	989	25.4%
Upper	4	14.3%	738	18.9%	12	42.9%	1,852	47.5%
Unknown	0	0.0%	0	0.0%	3	10.7%	367	9.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	3,897	100.0%	28	100.0%	3,897	100.0%
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	2	20.0%	103	21.1%
Moderate	3	30.0%	210	43.0%	6	60.0%	249	51.0%
Low/Moderate Total	3	30.0%	210	43.0%	8	80.0%	352	72.1%
Middle	5	50.0%	260	53.3%	1	10.0%	125	25.6%
Upper	2	20.0%	18	3.7%	1	10.0%	11	2.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	488	100.0%	10	100.0%	488	100.0%
	<b>Multi-Family</b>							
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	50.0%	520	37.1%	0	0.0%	0	0.0%
Upper	2	50.0%	881	62.9%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	4	100.0%	1,401	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,401	100.0%	4	100.0%	1,401	100.0%
	<b>HMDA Totals</b>							
Low	3	1.2%	182	0.5%	30	12.4%	2,606	7.9%
Moderate	33	13.6%	2,859	8.6%	56	23.1%	5,769	17.4%
Low/Moderate Total	36	14.9%	3,041	9.2%	86	35.5%	8,375	25.3%
Middle	155	64.0%	19,924	60.1%	69	28.5%	8,837	26.7%
Upper	51	21.1%	10,176	30.7%	73	30.2%	13,281	40.1%
Unknown	0	0.0%	0	0.0%	14	5.8%	2,648	8.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	242	100.0%	33,141	100.0%	242	100.0%	33,141	100.0%

\*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: Portage Community Bank 2018

Assessment Area/Group :Akron MSA - Portage County 2014

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	2	1.1%	132	0.6%	25	14.2%	1,572	7.3%
Moderate	26	14.8%	2,438	11.3%	39	22.2%	3,676	17.1%
Low/Moderate Total	28	15.9%	2,570	11.9%	64	36.4%	5,248	24.4%
Middle	111	63.1%	13,798	64.1%	46	26.1%	5,409	25.1%
Upper	37	21.0%	5,163	24.0%	59	33.5%	9,644	44.8%
Unknown	0	0.0%	0	0.0%	7	4.0%	1,230	5.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	176	100.0%	21,531	100.0%	176	100.0%	21,531	100.0%
	<b>Refinance</b>							
Low	1	2.9%	150	3.1%	3	8.8%	203	4.1%
Moderate	4	11.8%	513	10.4%	3	8.8%	285	5.8%
Low/Moderate Total	5	14.7%	663	13.5%	6	17.6%	488	9.9%
Middle	23	67.6%	3,394	69.1%	12	35.3%	1,352	27.5%
Upper	6	17.6%	853	17.4%	14	41.2%	2,295	46.7%
Unknown	0	0.0%	0	0.0%	2	5.9%	775	15.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	34	100.0%	4,910	100.0%	34	100.0%	4,910	100.0%
	<b>Home Improvement</b>							
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%	308	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	8	2.6%
Unknown	0	0.0%	0	0.0%	1	50.0%	300	97.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	308	100.0%	2	100.0%	308	100.0%
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	57.1%	3,112	77.0%	0	0.0%	0	0.0%
Low/Moderate Total	4	57.1%	3,112	77.0%	0	0.0%	0	0.0%
Middle	3	42.9%	927	23.0%	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%	7	100.0%	4,039	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	4,039	100.0%	7	100.0%	4,039	100.0%
	<b>HMDA Totals</b>							
Low	3	1.4%	282	0.9%	28	12.8%	1,775	5.8%
Moderate	34	15.5%	6,063	19.7%	42	19.2%	3,961	12.9%
Low/Moderate Total	37	16.9%	6,345	20.6%	70	32.0%	5,736	18.6%
Middle	139	63.5%	18,427	59.9%	58	26.5%	6,761	22.0%
Upper	43	19.6%	6,016	19.5%	74	33.8%	11,947	38.8%
Unknown	0	0.0%	0	0.0%	17	7.8%	6,344	20.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	219	100.0%	30,788	100.0%	219	100.0%	30,788	100.0%

\*Information based on 2010 ACS data

### HMDA Loan Distribution Table

Exam: Portage Community Bank 2018

Assessment Area/Group :Akron MSA - Portage County 2013

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	2	1.2%	325	1.4%	21	12.7%	1,505	6.7%
Moderate	23	13.9%	2,921	13.0%	47	28.5%	4,765	21.2%
Low/Moderate Total	25	15.2%	3,246	14.4%	68	41.2%	6,270	27.9%
Middle	97	58.8%	12,812	57.0%	40	24.2%	5,310	23.6%
Upper	43	26.1%	6,425	28.6%	48	29.1%	7,894	35.1%
Unknown	0	0.0%	0	0.0%	9	5.5%	3,009	13.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	165	100.0%	22,483	100.0%	165	100.0%	22,483	100.0%
	<b>Refinance</b>							
Low	1	1.3%	90	0.8%	4	5.1%	343	3.2%
Moderate	10	12.8%	1,380	12.9%	8	10.3%	813	7.6%
Low/Moderate Total	11	14.1%	1,470	13.7%	12	15.4%	1,156	10.8%
Middle	51	65.4%	6,613	61.7%	21	26.9%	2,497	23.3%
Upper	16	20.5%	2,633	24.6%	36	46.2%	5,976	55.8%
Unknown	0	0.0%	0	0.0%	9	11.5%	1,087	10.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	10,716	100.0%	78	100.0%	10,716	100.0%
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	16.7%	10	2.7%	2	33.3%	50	13.5%
Low/Moderate Total	1	16.7%	10	2.7%	2	33.3%	50	13.5%
Middle	4	66.7%	338	91.4%	0	0.0%	0	0.0%
Upper	1	16.7%	22	5.9%	4	66.7%	320	86.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	370	100.0%	6	100.0%	370	100.0%
	<b>Multi-Family</b>							
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	3	100.0%	1,404	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%	3	100.0%	1,404	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	1,404	100.0%	3	100.0%	1,404	100.0%
	<b>HMDA Totals</b>							
Low	3	1.2%	415	1.2%	25	9.9%	1,848	5.3%
Moderate	34	13.5%	4,311	12.3%	57	22.6%	5,628	16.1%
Low/Moderate Total	37	14.7%	4,726	13.5%	82	32.5%	7,476	21.4%
Middle	155	61.5%	21,167	60.5%	61	24.2%	7,807	22.3%
Upper	60	23.8%	9,080	26.0%	88	34.9%	14,190	40.6%
Unknown	0	0.0%	0	0.0%	21	8.3%	5,500	15.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	252	100.0%	34,973	100.0%	252	100.0%	34,973	100.0%

\*Information based on 2010 ACS data

**CRA Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group: Akron MSA - Portage County 2017

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	1	1.3%	75	0.4%	0	0.0%	0	0.0%
Moderate	19	24.4%	3,567	18.9%	0	0.0%	0	0.0%
Low/Moderate Total	20	25.6%	3,642	19.3%	0	0.0%	0	0.0%
Middle	45	57.7%	9,065	48.1%	0	0.0%	0	0.0%
Upper	13	16.7%	6,121	32.5%	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	78	100.0%	18,828	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>							
Total \$1 Million or Less	51	65.4%	7,766	41.2%	0	0.0%	0	0.0%
Over \$1 Million	26	33.3%	10,912	58.0%	0	0.0%	0	0.0%
Not Known	1	1.3%	150	0.8%	0	0.0%	0	0.0%
Total	78	100.0%	18,828	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>							
\$100,000 or less	45	57.7%	2,093	11.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	18	23.1%	3,158	16.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	11	14.1%	6,022	32.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	4	5.1%	7,555	40.1%	0	0.0%	0	0.0%
Total	78	100.0%	18,828	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	33	64.7%	1,510	19.4%	0	0.0%	0	0.0%
\$100,001 - \$250,000	11	21.6%	1,962	25.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	11.8%	2,564	33.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	2.0%	1,730	22.3%	0	0.0%	0	0.0%
Total	51	100.0%	7,766	100.0%	0	0.0%	0	0.0%

\*Information based on 2015 ACS data

**CRA Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group: Akron MSA - Portage County 2016

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	1	1.3%	58	0.3%	0	0.0%	0	0.0%
Moderate	18	23.4%	6,324	28.9%	0	0.0%	0	0.0%
Low/Moderate Total	19	24.7%	6,382	29.2%	0	0.0%	0	0.0%
Middle	48	62.3%	12,015	54.9%	0	0.0%	0	0.0%
Upper	10	13.0%	3,484	15.9%	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	77	100.0%	21,880	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>							
Total \$1 Million or Less	49	63.6%	7,390	33.8%	0	0.0%	0	0.0%
Over \$1 Million	26	33.8%	14,444	66.0%	0	0.0%	0	0.0%
Not Known	2	2.6%	46	0.2%	0	0.0%	0	0.0%
Total	77	100.0%	21,880	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>							
\$100,000 or less	41	53.2%	1,586	7.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	20	26.0%	3,322	15.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	11	14.3%	4,927	22.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	5	6.5%	12,046	55.1%	0	0.0%	0	0.0%
Total	77	100.0%	21,880	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	30	61.2%	1,262	17.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	13	26.5%	2,082	28.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	10.2%	1,810	24.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	2.0%	2,236	30.3%	0	0.0%	0	0.0%
Total	49	100.0%	7,390	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**CRA Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group: Akron MSA - Portage County 2015

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	7	8.3%	3,018	14.2%	0	0.0%	0	0.0%
Moderate	21	25.0%	4,147	19.5%	0	0.0%	0	0.0%
Low/Moderate Total	28	33.3%	7,165	33.7%	0	0.0%	0	0.0%
Middle	42	50.0%	12,030	56.6%	0	0.0%	0	0.0%
Upper	14	16.7%	2,074	9.8%	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	84	100.0%	21,269	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>							
Total \$1 Million or Less	50	59.5%	6,965	32.7%	0	0.0%	0	0.0%
Over \$1 Million	31	36.9%	13,948	65.6%	0	0.0%	0	0.0%
Not Known	3	3.6%	356	1.7%	0	0.0%	0	0.0%
Total	84	100.0%	21,269	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>							
\$100,000 or less	44	52.4%	2,192	10.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	23	27.4%	4,051	19.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	13	15.5%	6,950	32.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	4	4.8%	8,075	38.0%	0	0.0%	0	0.0%
Total	84	100.0%	21,269	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	33	66.0%	1,447	20.8%	0	0.0%	0	0.0%
\$100,001 - \$250,000	14	28.0%	2,318	33.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	4.0%	1,025	14.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	2.0%	2,175	31.2%	0	0.0%	0	0.0%
Total	50	100.0%	6,965	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**CRA Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group: Akron MSA - Portage County 2014

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	3	3.9%	470	1.4%	0	0.0%	0	0.0%
Moderate	20	26.0%	6,447	18.6%	0	0.0%	0	0.0%
Low/Moderate Total	23	29.9%	6,917	19.9%	0	0.0%	0	0.0%
Middle	36	46.8%	9,567	27.5%	0	0.0%	0	0.0%
Upper	18	23.4%	18,262	52.6%	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	77	100.0%	34,747	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>							
Total \$1 Million or Less	53	68.8%	13,222	38.1%	0	0.0%	0	0.0%
Over \$1 Million	22	28.6%	18,560	53.4%	0	0.0%	0	0.0%
Not Known	2	2.6%	2,965	8.5%	0	0.0%	0	0.0%
Total	77	100.0%	34,747	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>							
\$100,000 or less	36	46.8%	1,565	4.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	20	26.0%	4,042	11.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	11	14.3%	6,312	18.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	10	13.0%	22,828	65.7%	0	0.0%	0	0.0%
Total	77	100.0%	34,747	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	32	60.4%	1,351	10.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	12	22.6%	2,554	19.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	9.4%	2,162	16.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	4	7.5%	7,155	54.1%	0	0.0%	0	0.0%
Total	53	100.0%	13,222	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data



**CRA Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group: Akron MSA - Portage County 2013

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	1	1.5%	556	5.1%	0	0.0%	0	0.0%
Moderate	19	28.4%	4,053	37.4%	0	0.0%	0	0.0%
Low/Moderate Total	20	29.9%	4,609	42.6%	0	0.0%	0	0.0%
Middle	35	52.2%	4,849	44.8%	0	0.0%	0	0.0%
Upper	12	17.9%	1,371	12.7%	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	67	100.0%	10,829	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>							
Total \$1 Million or Less	47	70.1%	7,276	67.2%	0	0.0%	0	0.0%
Over \$1 Million	13	19.4%	3,358	31.0%	0	0.0%	0	0.0%
Not Known	7	10.4%	196	1.8%	0	0.0%	0	0.0%
Total	67	100.0%	10,829	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>							
\$100,000 or less	40	59.7%	1,747	16.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	14	20.9%	2,733	25.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	12	17.9%	5,149	47.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	1.5%	1,200	11.1%	0	0.0%	0	0.0%
Total	67	100.0%	10,829	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	30	63.8%	1,296	17.8%	0	0.0%	0	0.0%
\$100,001 - \$250,000	10	21.3%	1,999	27.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	12.8%	2,781	38.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	2.1%	1,200	16.5%	0	0.0%	0	0.0%
Total	47	100.0%	7,276	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Consumer Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group :Akron MSA - Portage County 2017

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Equity</b>							
Low	0	0.0%	0	0.0%	13	12.9%	970	11.7%
Moderate	14	13.9%	957	11.5%	17	16.8%	1,219	14.6%
Low/Moderate Total	14	13.9%	957	11.5%	30	29.7%	2,189	26.3%
Middle	78	77.2%	6,382	76.7%	21	20.8%	1,631	19.6%
Upper	9	8.9%	982	11.8%	50	49.5%	4,502	54.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	101	100.0%	8,321	100.0%	101	100.0%	8,321	100.0%
	<b>Motor Vehicle</b>							
Low	0	0.0%	0	0.0%	7	26.9%	70	31.4%
Moderate	9	34.6%	49	22.1%	8	30.8%	82	36.7%
Low/Moderate Total	9	34.6%	49	22.1%	15	57.7%	152	68.0%
Middle	14	53.8%	140	62.6%	8	30.8%	60	26.8%
Upper	3	11.5%	34	15.3%	3	11.5%	11	5.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	223	100.0%	26	100.0%	223	100.0%
	<b>Other - Secured</b>							
Low	0	0.0%	0	0.0%	7	38.9%	27	20.9%
Moderate	7	38.9%	55	42.7%	2	11.1%	9	7.1%
Low/Moderate Total	7	38.9%	55	42.7%	9	50.0%	36	27.9%
Middle	10	55.6%	72	56.2%	4	22.2%	29	22.5%
Upper	1	5.6%	2	1.2%	4	22.2%	64	49.6%
Unknown	0	0.0%	0	0.0%	1	5.6%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	18	100.0%	129	100.0%	18	100.0%	129	100.0%
	<b>Other - Unsecured</b>							
Low	0	0.0%	0	0.0%	1	25.0%	10	37.7%
Moderate	1	25.0%	7	26.4%	1	25.0%	7	26.4%
Low/Moderate Total	1	25.0%	7	26.4%	2	50.0%	17	64.2%
Middle	3	75.0%	20	73.6%	1	25.0%	8	30.2%
Upper	0	0.0%	0	0.0%	1	25.0%	2	5.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	27	100.0%	4	100.0%	27	100.0%
	<b>Consumer Loan Totals</b>							
Low	0	0.0%	0	0.0%	28	18.8%	1,077	12.4%
Moderate	31	20.8%	1,069	12.3%	28	18.8%	1,317	15.1%
Low/Moderate Total	31	20.8%	1,069	12.3%	56	37.6%	2,394	27.5%
Middle	105	70.5%	6,614	76.0%	34	22.8%	1,728	19.9%
Upper	13	8.7%	1,018	11.7%	58	38.9%	4,579	52.6%
Unknown	0	0.0%	0	0.0%	1	0.7%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	149	100.0%	8,700	100.0%	149	100.0%	8,700	100.0%

**Consumer Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group :Akron MSA - Portage County 2016

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
	<b>Home Equity</b>							
Low	0	0.0%	0	0.0%	16	12.7%	847	9.0%
Moderate	21	16.7%	1,385	14.7%	29	23.0%	2,330	24.7%
Low/Moderate Total	21	16.7%	1,385	14.7%	45	35.7%	3,177	33.7%
Middle	77	61.1%	5,181	54.9%	40	31.7%	3,135	33.2%
Upper	28	22.2%	2,873	30.4%	39	31.0%	2,968	31.4%
Unknown	0	0.0%	0	0.0%	2	1.6%	160	1.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	126	100.0%	9,440	100.0%	126	100.0%	9,440	100.0%
	<b>Motor Vehicle</b>							
Low	0	0.0%	0	0.0%	2	16.7%	10	5.1%
Moderate	3	25.0%	29	14.3%	5	41.7%	46	22.5%
Low/Moderate Total	3	25.0%	29	14.3%	7	58.3%	56	27.6%
Middle	6	50.0%	145	71.3%	3	25.0%	42	20.9%
Upper	3	25.0%	29	14.4%	2	16.7%	104	51.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	203	100.0%	12	100.0%	203	100.0%
	<b>Other - Secured</b>							
Low	0	0.0%	0	0.0%	8	50.0%	40	24.8%
Moderate	3	18.8%	20	12.2%	3	18.8%	63	39.5%
Low/Moderate Total	3	18.8%	20	12.2%	11	68.8%	103	64.3%
Middle	13	81.3%	141	87.8%	2	12.5%	3	1.9%
Upper	0	0.0%	0	0.0%	2	12.5%	36	22.3%
Unknown	0	0.0%	0	0.0%	1	6.3%	19	11.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	161	100.0%	16	100.0%	161	100.0%
	<b>Other - Unsecured</b>							
Low	0	0.0%	0	0.0%	2	15.4%	17	15.6%
Moderate	4	30.8%	28	25.7%	3	23.1%	28	25.7%
Low/Moderate Total	4	30.8%	28	25.7%	5	38.5%	45	41.3%
Middle	7	53.8%	61	56.0%	5	38.5%	43	39.4%
Upper	2	15.4%	20	18.3%	3	23.1%	21	19.3%
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	13	100.0%	109	100.0%	13	100.0%	109	100.0%
	<b>Consumer Loan Totals</b>							
Low	0	0.0%	0	0.0%	28	16.8%	915	9.2%
Moderate	31	18.6%	1,462	14.7%	40	24.0%	2,467	24.9%
Low/Moderate Total	31	18.6%	1,462	14.7%	68	40.7%	3,381	34.1%
Middle	103	61.7%	5,528	55.8%	50	29.9%	3,223	32.5%
Upper	33	19.8%	2,923	29.5%	46	27.5%	3,129	31.6%
Unknown	0	0.0%	0	0.0%	3	1.8%	179	1.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	167	100.0%	9,912	100.0%	167	100.0%	9,912	100.0%

**Consumer Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group :Akron MSA - Portage County 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Equity</b>							
Low	0	0.0%	0	0.0%	14	9.5%	581	4.9%
Moderate	33	22.4%	2,674	22.5%	33	22.4%	2,450	20.6%
Low/Moderate Total	33	22.4%	2,674	22.5%	47	32.0%	3,030	25.5%
Middle	88	59.9%	7,276	61.2%	32	21.8%	2,337	19.6%
Upper	26	17.7%	1,944	16.3%	68	46.3%	6,528	54.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	147	100.0%	11,895	100.0%	147	100.0%	11,895	100.0%
	<b>Motor Vehicle</b>							
Low	1	4.5%	12	7.4%	7	31.8%	44	27.6%
Moderate	4	18.2%	21	12.9%	10	45.5%	68	42.7%
Low/Moderate Total	5	22.7%	33	20.4%	17	77.3%	113	70.4%
Middle	9	40.9%	82	51.0%	3	13.6%	31	19.5%
Upper	8	36.4%	46	28.7%	2	9.1%	16	10.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	22	100.0%	160	100.0%	22	100.0%	160	100.0%
	<b>Other - Secured</b>							
Low	0	0.0%	0	0.0%	5	31.3%	63	22.1%
Moderate	5	31.3%	49	17.2%	8	50.0%	158	55.6%
Low/Moderate Total	5	31.3%	49	17.2%	13	81.3%	221	77.7%
Middle	8	50.0%	174	61.2%	2	12.5%	52	18.3%
Upper	3	18.8%	62	21.6%	1	6.3%	12	4.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	285	100.0%	16	100.0%	285	100.0%
	<b>Other - Unsecured</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	100.0%	15	100.0%
Low/Moderate Total	0	0.0%	0	0.0%	2	100.0%	15	100.0%
Middle	1	50.0%	10	64.8%	0	0.0%	0	0.0%
Upper	1	50.0%	5	35.2%	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	2	100.0%	15	100.0%	2	100.0%	15	100.0%
	<b>Consumer Loan Totals</b>							
Low	1	0.5%	12	0.1%	26	13.9%	688	5.6%
Moderate	42	22.5%	2,744	22.2%	53	28.3%	2,691	21.8%
Low/Moderate Total	43	23.0%	2,756	22.3%	79	42.2%	3,379	27.3%
Middle	106	56.7%	7,542	61.0%	37	19.8%	2,420	19.6%
Upper	38	20.3%	2,057	16.6%	71	38.0%	6,556	53.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	187	100.0%	12,354	100.0%	187	100.0%	12,354	100.0%

**Consumer Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group :Akron MSA - Portage County 2014

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Equity</b>							
Low	0	0.0%	0	0.0%	23	24.5%	1,369	21.4%
Moderate	26	27.7%	1,573	24.5%	19	20.2%	1,258	19.6%
Low/Moderate Total	26	27.7%	1,573	24.5%	42	44.7%	2,627	41.0%
Middle	55	58.5%	3,773	58.9%	14	14.9%	809	12.6%
Upper	13	13.8%	1,062	16.6%	38	40.4%	2,972	46.4%
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	94	100.0%	6,407	100.0%	94	100.0%	6,407	100.0%
	<b>Motor Vehicle</b>							
Low	0	0.0%	0	0.0%	6	46.2%	20	21.0%
Moderate	2	15.4%	14	15.3%	2	15.4%	11	12.0%
Low/Moderate Total	2	15.4%	14	15.3%	8	61.5%	31	33.0%
Middle	9	69.2%	65	69.7%	3	23.1%	25	26.7%
Upper	2	15.4%	14	15.0%	2	15.4%	37	40.3%
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	13	100.0%	93	100.0%	13	100.0%	93	100.0%
	<b>Other - Secured</b>							
Low	0	0.0%	0	0.0%	11	57.9%	119	25.6%
Moderate	9	47.4%	348	75.1%	3	15.8%	67	14.4%
Low/Moderate Total	9	47.4%	348	75.1%	14	73.7%	186	40.0%
Middle	7	36.8%	85	18.4%	2	10.5%	21	4.6%
Upper	3	15.8%	30	6.5%	3	15.8%	257	55.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	464	100.0%	19	100.0%	464	100.0%
	<b>Other - Unsecured</b>							
Low	0	0.0%	0	0.0%	2	66.7%	11	42.9%
Moderate	1	33.3%	8	30.5%	0	0.0%	0	0.0%
Low/Moderate Total	1	33.3%	8	30.5%	2	66.7%	11	42.9%
Middle	2	66.7%	18	69.5%	1	33.3%	15	57.1%
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	3	100.0%	26	100.0%	3	100.0%	26	100.0%
	<b>Consumer Loan Totals</b>							
Low	0	0.0%	0	0.0%	42	32.6%	1,518	21.7%
Moderate	38	29.5%	1,943	27.8%	24	18.6%	1,336	19.1%
Low/Moderate Total	38	29.5%	1,943	27.8%	66	51.2%	2,854	40.8%
Middle	73	56.6%	3,941	56.4%	20	15.5%	870	12.4%
Upper	18	14.0%	1,106	15.8%	43	33.3%	3,267	46.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	129	100.0%	6,990	100.0%	129	100.0%	6,990	100.0%

**Consumer Loan Distribution Table**

Exam: Portage Community Bank 2018

Assessment Area/Group :Akron MSA - Portage County 2013

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
	<b>Home Equity</b>							
Low	0	0.0%	0	0.0%	12	17.4%	671	14.0%
Moderate	16	23.2%	881	18.3%	12	17.4%	749	15.6%
Low/Moderate Total	16	23.2%	881	18.3%	24	34.8%	1,420	29.5%
Middle	39	56.5%	2,770	57.6%	17	24.6%	1,337	27.8%
Upper	14	20.3%	1,159	24.1%	28	40.6%	2,052	42.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	69	100.0%	4,810	100.0%	69	100.0%	4,810	100.0%
	<b>Motor Vehicle</b>							
Low	0	0.0%	0	0.0%	6	46.2%	40	37.5%
Moderate	1	7.7%	7	6.8%	2	15.4%	18	17.4%
Low/Moderate Total	1	7.7%	7	6.8%	8	61.5%	58	54.9%
Middle	11	84.6%	84	79.4%	4	30.8%	37	34.6%
Upper	1	7.7%	15	13.8%	1	7.7%	11	10.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	106	100.0%	13	100.0%	106	100.0%
	<b>Other - Secured</b>							
Low	0	0.0%	0	0.0%	6	54.5%	51	20.9%
Moderate	3	27.3%	23	9.6%	2	18.2%	34	13.8%
Low/Moderate Total	3	27.3%	23	9.6%	8	72.7%	84	34.7%
Middle	8	72.7%	219	90.4%	2	18.2%	118	48.8%
Upper	0	0.0%	0	0.0%	1	9.1%	40	16.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	242	100.0%	11	100.0%	242	100.0%
	<b>Other - Unsecured</b>							
Low	0	0.0%	0	0.0%	1	25.0%	2	9.1%
Moderate	0	0.0%	0	0.0%	1	25.0%	3	13.0%
Low/Moderate Total	0	0.0%	0	0.0%	2	50.0%	4	22.1%
Middle	3	75.0%	17	87.0%	1	25.0%	5	26.0%
Upper	1	25.0%	3	13.0%	1	25.0%	10	51.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	19	100.0%	4	100.0%	19	100.0%
	<b>Consumer Loan Totals</b>							
Low	0	0.0%	0	0.0%	25	25.8%	763	14.7%
Moderate	20	20.6%	911	17.6%	17	17.5%	804	15.5%
Low/Moderate Total	20	20.6%	911	17.6%	42	43.3%	1,567	30.3%
Middle	61	62.9%	3,090	59.7%	24	24.7%	1,497	28.9%
Upper	16	16.5%	1,176	22.7%	31	32.0%	2,113	40.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	97	100.0%	5,177	100.0%	97	100.0%	5,177	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Portage Community Bank 2018

Selected Year: 2017

Akron MSA - Portage County 2017

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	477	3.8%	34,622	1.72%	1,049	8.37%	81,147	4.04%
Moderate	2,071	16.52%	193,535	9.63%	2,514	20.05%	272,522	13.57%
<i>Low/Moderate Total</i>	<i>2,548</i>	<i>20.32%</i>	<i>228,157</i>	<i>11.36%</i>	<i>3,563</i>	<i>28.42%</i>	<i>353,669</i>	<i>17.61%</i>
Middle	5,600	44.67%	799,338	39.79%	2,569	20.49%	371,369	18.49%
Upper	4,389	35.01%	981,222	48.85%	4,394	35.05%	1,003,915	49.98%
Unknown	0	0.0%	0	0.0%	2,011	16.04%	279,764	13.93%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>12,537</b>	<b>100.0%</b>	<b>2,008,717</b>	<b>100.0%</b>	<b>12,537</b>	<b>100.0%</b>	<b>2,008,717</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	190	3.46%	15,824	2.0%	426	7.76%	32,741	4.13%
Moderate	776	14.14%	61,373	7.75%	924	16.84%	87,399	11.04%
<i>Low/Moderate Total</i>	<i>966</i>	<i>17.61%</i>	<i>77,197</i>	<i>9.75%</i>	<i>1,350</i>	<i>24.6%</i>	<i>120,140</i>	<i>15.17%</i>
Middle	2,508	45.71%	315,844	39.88%	1,137	20.72%	137,205	17.32%
Upper	2,013	36.69%	398,923	50.37%	2,156	39.29%	396,856	50.11%
Unknown	0	0.0%	0	0.0%	844	15.38%	137,763	17.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>5,487</b>	<b>100.0%</b>	<b>791,964</b>	<b>100.0%</b>	<b>5,487</b>	<b>100.0%</b>	<b>791,964</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	54	5.46%	1,168	1.53%	85	8.59%	2,314	3.04%
Moderate	173	17.49%	5,239	6.88%	224	22.65%	8,966	11.78%
<i>Low/Moderate Total</i>	<i>227</i>	<i>22.95%</i>	<i>6,407</i>	<i>8.42%</i>	<i>309</i>	<i>31.24%</i>	<i>11,280</i>	<i>14.82%</i>
Middle	432	43.68%	26,734	35.13%	221	22.35%	11,718	15.4%
Upper	330	33.37%	42,966	56.45%	435	43.98%	44,125	57.98%
Unknown	0	0.0%	0	0.0%	24	2.43%	8,984	11.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>989</b>	<b>100.0%</b>	<b>76,107</b>	<b>100.0%</b>	<b>989</b>	<b>100.0%</b>	<b>76,107</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	10	14.71%	14,052	5.16%	0	0.0%	0	0.0%
Moderate	17	25.0%	11,877	4.36%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>27</i>	<i>39.71%</i>	<i>25,929</i>	<i>9.53%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	27	39.71%	104,294	38.32%	0	0.0%	0	0.0%
Upper	14	20.59%	141,965	52.16%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	68	100.0%	272,188	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>68</b>	<b>100.0%</b>	<b>272,188</b>	<b>100.0%</b>	<b>68</b>	<b>100.0%</b>	<b>272,188</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	731	3.83%	65,666	2.09%	1,560	8.18%	116,202	3.69%
Moderate	3,037	15.92%	272,024	8.64%	3,662	19.19%	368,887	11.71%
<i>Low/Moderate Total</i>	<i>3,768</i>	<i>19.75%</i>	<i>337,690</i>	<i>10.72%</i>	<i>5,222</i>	<i>27.37%</i>	<i>485,089</i>	<i>15.4%</i>
Middle	8,567	44.9%	1,246,210	39.58%	3,927	20.58%	520,292	16.52%
Upper	6,746	35.35%	1,565,076	49.7%	6,985	36.61%	1,444,896	45.88%
Unknown	0	0.0%	0	0.0%	2,947	15.44%	698,699	22.19%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>19,081</b>	<b>100.0%</b>	<b>3,148,976</b>	<b>100.0%</b>	<b>19,081</b>	<b>100.0%</b>	<b>3,148,976</b>	<b>100.0%</b>

Peer Group HMDA Loan Distribution Table

Exam ID: Portage Community Bank 2018

Selected Year: 2016

Akron MSA - Portage County 2016

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	223	1.88%	13,686	0.75%	1,187	10.02%	92,065	5.01%
Moderate	1,798	15.17%	164,981	8.99%	2,462	20.78%	262,718	14.31%
<i>Low/Moderate Total</i>	<i>2,021</i>	<i>17.06%</i>	<i>178,667</i>	<i>9.73%</i>	<i>3,649</i>	<i>30.8%</i>	<i>354,783</i>	<i>19.32%</i>
Middle	5,063	42.73%	667,479	36.35%	2,478	20.91%	354,256	19.29%
Upper	4,765	40.21%	989,937	53.92%	3,758	31.72%	863,379	47.02%
Unknown	0	0.0%	0	0.0%	1,964	16.58%	263,665	14.36%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>11,849</b>	<b>100.0%</b>	<b>1,836,083</b>	<b>100.0%</b>	<b>11,849</b>	<b>100.0%</b>	<b>1,836,083</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	111	1.43%	8,621	0.74%	546	7.02%	42,210	3.63%
Moderate	907	11.66%	76,838	6.61%	1,168	15.01%	114,364	9.83%
<i>Low/Moderate Total</i>	<i>1,018</i>	<i>13.08%</i>	<i>85,459</i>	<i>7.35%</i>	<i>1,714</i>	<i>22.03%</i>	<i>156,574</i>	<i>13.46%</i>
Middle	3,203	41.16%	396,930	34.13%	1,534	19.71%	190,743	16.4%
Upper	3,561	45.76%	680,642	58.52%	3,053	39.23%	597,069	51.34%
Unknown	0	0.0%	0	0.0%	1,481	19.03%	218,645	18.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>7,782</b>	<b>100.0%</b>	<b>1,163,031</b>	<b>100.0%</b>	<b>7,782</b>	<b>100.0%</b>	<b>1,163,031</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	30	3.51%	806	1.23%	78	9.13%	2,095	3.19%
Moderate	136	15.93%	3,824	5.83%	179	20.96%	6,918	10.54%
<i>Low/Moderate Total</i>	<i>166</i>	<i>19.44%</i>	<i>4,630</i>	<i>7.06%</i>	<i>257</i>	<i>30.09%</i>	<i>9,013</i>	<i>13.73%</i>
Middle	341	39.93%	20,218	30.81%	175	20.49%	8,787	13.39%
Upper	347	40.63%	40,775	62.14%	391	45.78%	44,833	68.32%
Unknown	0	0.0%	0	0.0%	31	3.63%	2,990	4.56%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>854</b>	<b>100.0%</b>	<b>65,623</b>	<b>100.0%</b>	<b>854</b>	<b>100.0%</b>	<b>65,623</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	13	22.41%	16,575	15.24%	0	0.0%	0	0.0%
Moderate	16	27.59%	37,797	34.75%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>29</i>	<i>50.0%</i>	<i>54,372</i>	<i>49.99%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	21	36.21%	15,511	14.26%	0	0.0%	0	0.0%
Upper	8	13.79%	38,883	35.75%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	58	100.0%	108,766	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>58</b>	<b>100.0%</b>	<b>108,766</b>	<b>100.0%</b>	<b>58</b>	<b>100.0%</b>	<b>108,766</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	377	1.84%	39,688	1.25%	1,811	8.82%	136,370	4.3%
Moderate	2,857	13.91%	283,440	8.93%	3,809	18.54%	384,000	12.1%
<i>Low/Moderate Total</i>	<i>3,234</i>	<i>15.74%</i>	<i>323,128</i>	<i>10.18%</i>	<i>5,620</i>	<i>27.36%</i>	<i>520,370</i>	<i>16.4%</i>
Middle	8,628	42.0%	1,100,138	34.67%	4,187	20.38%	553,786	17.45%
Upper	8,681	42.26%	1,750,237	55.15%	7,202	35.06%	1,505,281	47.43%
Unknown	0	0.0%	0	0.0%	3,534	17.2%	594,066	18.72%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>20,543</b>	<b>100.0%</b>	<b>3,173,503</b>	<b>100.0%</b>	<b>20,543</b>	<b>100.0%</b>	<b>3,173,503</b>	<b>100.0%</b>



Peer Group HMDA Loan Distribution Table

Exam ID: Portage Community Bank 2018

Selected Year: 2015

Akron MSA - Portage County 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	200	1.91%	11,783	0.74%	1,045	9.97%	75,780	4.75%
Moderate	1,452	13.86%	121,091	7.58%	2,209	21.08%	234,004	14.65%
<i>Low/Moderate Total</i>	<i>1,652</i>	<i>15.77%</i>	<i>132,874</i>	<i>8.32%</i>	<i>3,254</i>	<i>31.06%</i>	<i>309,784</i>	<i>19.4%</i>
Middle	4,340	41.42%	550,155	34.45%	2,213	21.12%	313,056	19.6%
Upper	4,486	42.81%	913,838	57.23%	3,190	30.44%	723,223	45.29%
Unknown	0	0.0%	0	0.0%	1,821	17.38%	250,804	15.71%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>10,478</b>	<b>100.0%</b>	<b>1,596,867</b>	<b>100.0%</b>	<b>10,478</b>	<b>100.0%</b>	<b>1,596,867</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	139	2.01%	10,298	1.05%	494	7.14%	37,458	3.82%
Moderate	838	12.12%	71,756	7.32%	1,033	14.94%	98,710	10.07%
<i>Low/Moderate Total</i>	<i>977</i>	<i>14.13%</i>	<i>82,054</i>	<i>8.37%</i>	<i>1,527</i>	<i>22.09%</i>	<i>136,168</i>	<i>13.89%</i>
Middle	2,916	42.18%	351,607	35.86%	1,372	19.84%	164,742	16.8%
Upper	3,021	43.69%	546,708	55.77%	2,589	37.45%	474,267	48.38%
Unknown	0	0.0%	0	0.0%	1,426	20.62%	205,192	20.93%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>6,914</b>	<b>100.0%</b>	<b>980,369</b>	<b>100.0%</b>	<b>6,914</b>	<b>100.0%</b>	<b>980,369</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	33	4.18%	1,874	3.38%	98	12.42%	2,793	5.04%
Moderate	139	17.62%	4,893	8.84%	157	19.9%	5,841	10.55%
<i>Low/Moderate Total</i>	<i>172</i>	<i>21.8%</i>	<i>6,767</i>	<i>12.22%</i>	<i>255</i>	<i>32.32%</i>	<i>8,634</i>	<i>15.59%</i>
Middle	302	38.28%	15,076	27.22%	162	20.53%	8,421	15.21%
Upper	315	39.92%	33,536	60.56%	337	42.71%	33,955	61.31%
Unknown	0	0.0%	0	0.0%	35	4.44%	4,369	7.89%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>789</b>	<b>100.0%</b>	<b>55,379</b>	<b>100.0%</b>	<b>789</b>	<b>100.0%</b>	<b>55,379</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	10	13.51%	10,001	3.54%	0	0.0%	0	0.0%
Moderate	15	20.27%	26,769	9.48%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>25</i>	<i>33.78%</i>	<i>36,770</i>	<i>13.02%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	25	33.78%	101,650	36.01%	0	0.0%	0	0.0%
Upper	24	32.43%	143,884	50.97%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	74	100.0%	282,304	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>74</b>	<b>100.0%</b>	<b>282,304</b>	<b>100.0%</b>	<b>74</b>	<b>100.0%</b>	<b>282,304</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	382	2.09%	33,956	1.16%	1,637	8.97%	116,031	3.98%
Moderate	2,444	13.39%	224,509	7.7%	3,399	18.62%	338,555	11.61%
<i>Low/Moderate Total</i>	<i>2,826</i>	<i>15.48%</i>	<i>258,465</i>	<i>8.87%</i>	<i>5,036</i>	<i>27.59%</i>	<i>454,586</i>	<i>15.6%</i>
Middle	7,583	41.54%	1,018,488	34.94%	3,747	20.53%	486,219	16.68%
Upper	7,846	42.98%	1,637,966	56.19%	6,116	33.5%	1,231,445	42.25%
Unknown	0	0.0%	0	0.0%	3,356	18.38%	742,669	25.48%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>18,255</b>	<b>100.0%</b>	<b>2,914,919</b>	<b>100.0%</b>	<b>18,255</b>	<b>100.0%</b>	<b>2,914,919</b>	<b>100.0%</b>

Peer Group HMDA Loan Distribution Table

Exam ID: Portage Community Bank 2018

Selected Year: 2014

Akron MSA - Portage County 2014

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	171	1.77%	10,779	0.76%	880	9.11%	59,370	4.19%
Moderate	1,300	13.45%	101,080	7.14%	1,963	20.31%	187,871	13.27%
<i>Low/Moderate Total</i>	<i>1,471</i>	<i>15.22%</i>	<i>111,859</i>	<i>7.9%</i>	<i>2,843</i>	<i>29.42%</i>	<i>247,241</i>	<i>17.46%</i>
Middle	4,096	42.38%	499,040	35.24%	2,009	20.79%	259,130	18.3%
Upper	4,097	42.39%	805,108	56.86%	3,362	34.79%	714,852	50.48%
Unknown	0	0.0%	0	0.0%	1,450	15.0%	194,784	13.76%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>9,664</b>	<b>100.0%</b>	<b>1,416,007</b>	<b>100.0%</b>	<b>9,664</b>	<b>100.0%</b>	<b>1,416,007</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	142	2.26%	10,000	1.25%	491	7.82%	35,431	4.44%
Moderate	864	13.76%	67,071	8.41%	970	15.45%	84,556	10.61%
<i>Low/Moderate Total</i>	<i>1,006</i>	<i>16.02%</i>	<i>77,071</i>	<i>9.67%</i>	<i>1,461</i>	<i>23.27%</i>	<i>119,987</i>	<i>15.05%</i>
Middle	2,737	43.6%	296,038	37.14%	1,383	22.03%	147,193	18.46%
Upper	2,535	40.38%	424,073	53.2%	2,526	40.24%	411,069	51.57%
Unknown	0	0.0%	0	0.0%	908	14.46%	118,933	14.92%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>6,278</b>	<b>100.0%</b>	<b>797,182</b>	<b>100.0%</b>	<b>6,278</b>	<b>100.0%</b>	<b>797,182</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	19	3.06%	429	1.25%	62	10.0%	2,206	6.42%
Moderate	128	20.65%	2,787	8.11%	129	20.81%	4,537	13.2%
<i>Low/Moderate Total</i>	<i>147</i>	<i>23.71%</i>	<i>3,216</i>	<i>9.36%</i>	<i>191</i>	<i>30.81%</i>	<i>6,743</i>	<i>19.62%</i>
Middle	269	43.39%	12,369	35.99%	144	23.23%	5,971	17.38%
Upper	204	32.9%	18,779	54.65%	234	37.74%	18,332	53.35%
Unknown	0	0.0%	0	0.0%	51	8.23%	3,318	9.66%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>620</b>	<b>100.0%</b>	<b>34,364</b>	<b>100.0%</b>	<b>620</b>	<b>100.0%</b>	<b>34,364</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	3	5.45%	1,067	0.94%	0	0.0%	0	0.0%
Moderate	20	36.36%	27,183	23.92%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>23</i>	<i>41.82%</i>	<i>28,250</i>	<i>24.86%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	21	38.18%	52,183	45.92%	0	0.0%	0	0.0%
Upper	11	20.0%	33,198	29.22%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	55	100.0%	113,631	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>55</b>	<b>100.0%</b>	<b>113,631</b>	<b>100.0%</b>	<b>55</b>	<b>100.0%</b>	<b>113,631</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	335	2.02%	22,275	0.94%	1,433	8.62%	97,007	4.11%
Moderate	2,312	13.91%	198,121	8.39%	3,062	18.43%	276,964	11.73%
<i>Low/Moderate Total</i>	<i>2,647</i>	<i>15.93%</i>	<i>220,396</i>	<i>9.33%</i>	<i>4,495</i>	<i>27.05%</i>	<i>373,971</i>	<i>15.84%</i>
Middle	7,123	42.87%	859,630	36.41%	3,536	21.28%	412,294	17.46%
Upper	6,847	41.2%	1,281,158	54.26%	6,122	36.84%	1,144,253	48.46%
Unknown	0	0.0%	0	0.0%	2,464	14.83%	430,666	18.24%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>16,617</b>	<b>100.0%</b>	<b>2,361,184</b>	<b>100.0%</b>	<b>16,617</b>	<b>100.0%</b>	<b>2,361,184</b>	<b>100.0%</b>

Peer Group HMDA Loan Distribution Table

Exam ID: Portage Community Bank 2018  
Akron MSA - Portage County 2013

Selected Year: 2013

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	173	1.71%	10,803	0.72%	1,019	10.09%	72,086	4.83%
Moderate	1,278	12.65%	101,390	6.79%	2,191	21.69%	222,125	14.88%
<i>Low/Moderate Total</i>	<i>1,451</i>	<i>14.36%</i>	<i>112,193</i>	<i>7.52%</i>	<i>3,210</i>	<i>31.78%</i>	<i>294,211</i>	<i>19.71%</i>
Middle	4,186	41.44%	497,426	33.33%	2,174	21.52%	297,365	19.92%
Upper	4,464	44.19%	882,959	59.16%	3,404	33.7%	735,812	49.3%
Unknown	0	0.0%	0	0.0%	1,313	13.0%	165,190	11.07%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>10,101</i>	<i>100.0%</i>	<i>1,492,578</i>	<i>100.0%</i>	<i>10,101</i>	<i>100.0%</i>	<i>1,492,578</i>	<i>100.0%</i>
	<b>Refinance</b>							
Low	315	2.12%	21,185	0.95%	1,131	7.6%	84,375	3.8%
Moderate	1,946	13.08%	211,732	9.54%	2,353	15.81%	219,877	9.9%
<i>Low/Moderate Total</i>	<i>2,261</i>	<i>15.2%</i>	<i>232,917</i>	<i>10.49%</i>	<i>3,484</i>	<i>23.42%</i>	<i>304,252</i>	<i>13.7%</i>
Middle	6,144	41.29%	823,392	37.08%	3,260	21.91%	368,466	16.59%
Upper	6,474	43.51%	1,164,055	52.43%	6,232	41.88%	1,061,219	47.79%
Unknown	0	0.0%	0	0.0%	1,903	12.79%	486,427	21.91%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>14,879</i>	<i>100.0%</i>	<i>2,220,364</i>	<i>100.0%</i>	<i>14,879</i>	<i>100.0%</i>	<i>2,220,364</i>	<i>100.0%</i>
	<b>Home Improvement</b>							
Low	21	3.52%	284	0.79%	70	11.73%	2,137	5.91%
Moderate	110	18.43%	2,913	8.05%	126	21.11%	4,528	12.52%
<i>Low/Moderate Total</i>	<i>131</i>	<i>21.94%</i>	<i>3,197</i>	<i>8.84%</i>	<i>196</i>	<i>32.83%</i>	<i>6,665</i>	<i>18.43%</i>
Middle	249	41.71%	13,521	37.38%	138	23.12%	6,639	18.35%
Upper	217	36.35%	19,452	53.78%	240	40.2%	20,386	56.36%
Unknown	0	0.0%	0	0.0%	23	3.85%	2,480	6.86%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>597</i>	<i>100.0%</i>	<i>36,170</i>	<i>100.0%</i>	<i>597</i>	<i>100.0%</i>	<i>36,170</i>	<i>100.0%</i>
	<b>Multi-Family</b>							
Low	7	15.56%	33,948	35.18%	0	0.0%	0	0.0%
Moderate	15	33.33%	21,950	22.74%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>22</i>	<i>48.89%</i>	<i>55,898</i>	<i>57.92%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	15	33.33%	20,457	21.2%	0	0.0%	0	0.0%
Upper	8	17.78%	20,150	20.88%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	45	100.0%	96,505	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>45</i>	<i>100.0%</i>	<i>96,505</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>96,505</i>	<i>100.0%</i>
	<b>HMDA Totals</b>							
Low	516	2.01%	66,220	1.72%	2,220	8.66%	158,598	4.12%
Moderate	3,349	13.07%	337,985	8.79%	4,670	18.23%	446,530	11.61%
<i>Low/Moderate Total</i>	<i>3,865</i>	<i>15.08%</i>	<i>404,205</i>	<i>10.51%</i>	<i>6,890</i>	<i>26.89%</i>	<i>605,128</i>	<i>15.74%</i>
Middle	10,594	41.35%	1,354,796	35.23%	5,572	21.75%	672,470	17.49%
Upper	11,163	43.57%	2,086,616	54.26%	9,876	38.55%	1,817,417	47.26%
Unknown	0	0.0%	0	0.0%	3,284	12.82%	750,602	19.52%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>25,622</i>	<i>100.0%</i>	<i>3,845,617</i>	<i>100.0%</i>	<i>25,622</i>	<i>100.0%</i>	<i>3,845,617</i>	<i>100.0%</i>

## 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. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

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

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

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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

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

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