

PUBLIC DISCLOSURE

October 4, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Minster Bank
RSSD #604024

95 W. 4th Street
Minster, Ohio 45865

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: SATISFACTORY.

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding.

The major factors and criteria contributing to this rating include:

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

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination procedures for Intermediate Small Institutions was utilized to evaluate Minster Bank's (Minster) CRA Performance under Regulation BB. The evaluation considered CRA performance context, including Minster's asset size, financial condition, business strategy and market competition, as well as the demographics, economic characteristics, and credit needs of the AAs.

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 amended Home Mortgage Disclosure Act (HMDA) to add new data points. These changes were effective January 1, 2018 and included the reporting of home equity loans for certain institutions, the addition of new loan purposes, and changes to the definitions of some existing fields. Due to the breadth of these changes, HMDA-reportable loans originated or purchased on or after January 1, 2018 are separated from loans made before that date. Ultimately these changes did not have a significant impact on Minster's HMDA reporting.

Minster's CRA performance was evaluated based on HMDA-reportable lending data for the period of January 1, 2016 through December 31, 2020 and non-reportable small business, home equity, and consumer lending for the period of January 1, 2020 through December 31, 2020. HMDA-reportable loans are comprised of home purchase and refinance loans. There was enough volume to evaluate home purchase and refinance loans separately in 2020, 2019, and 2016 and home purchase loans only in 2018 and 2017 in each AA. Due to limited volumes, HMDA-reportable home improvement and multi-family loans were not considered in this evaluation.

Non-reportable consumer loans consist of motor vehicle loans, and there was only enough volume to conduct a meaningful analysis in Nonmetropolitan Ohio.

Community development activities were reviewed for the period between May 16, 2016 through October 4, 2021 as part of this evaluation. Community development activities are comprised of community development loans, investments, and services.

From April to August 2020, Minster facilitated 465 PPP loans totaling \$68.4 million through the U.S. government's Paycheck Protection Program (PPP) to help small businesses impacted by the COVID-19 emergency; and 421 (90.5%) of these PPP loans totaling \$63.7 million (93.2%) were originated inside the bank's delineated CRA AAs. Consistent with intermediate small bank procedures and information provided in the March 19, 2020,¹ joint statement on CRA Consideration for Activities in Response to COVID-19, Minster opted to include its PPP loans in LMI tracts in amounts of \$1.0 million or less for consideration under the community development test instead of the retail lending test.

Both AAs will receive full-scope evaluations based on the following criteria: the volume of lending by number of loans and dollar amount as a percentage of overall lending activity, deposit market share, number of branches, percentage of total deposits, percentage of LMI geographies, volume of community development activity, and other non-financial considerations. Both AAs received full-scope evaluations in the previous evaluation.

For this evaluation, Minster has the following two delineated CRA AAs in Ohio:

- Nonmetropolitan Ohio – full-scope evaluation
 - Consists of the entireties of Auglaize, Mercer, and Shelby counties
 - Since the previous evaluation, Minster removed Darke County from this AA
- Dayton-Kettering, OH MSA #19430 (Dayton MSA) – full-scope evaluation
 - Consists of the entireties of Miami and Montgomery counties

Nonmetropolitan Ohio AA was given the greatest weight in the evaluation, because it contains the largest percentage of loans (by number and dollar amount), total deposits, and branches; followed by the Dayton MSA. A sample of revenues for small business and borrower income for consumer loans was obtained. Borrower distribution received more weight than geographic distribution in this evaluation, primarily because the overall percentage of LMI families is greater than the percentage of LMI geographies.

Based on the total loan volume by number and dollar amounts available, HMDA-reportable loans (home purchase and refinance, respectively) received the greatest weight followed by small business, home equity, and motor vehicle loans. If lending performance differed between years, more weight was given to 2020 performance, the year with the most loans by volume and dollar amount.

¹ [March 19, 2020 Joint Statement](#)

Aggregated lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AAs, was used as a comparison in evaluating Minster's lending performance in 2016, 2017, 2018, 2019, and 2020.

To better understand AA community development and credit needs, several sources were used, including publicly accessible data and information submitted by the bank. Also, two community contact interviews were conducted with representatives from a community resource organization and an affordable housing organization operating inside the Minster's delineated AAs. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the AAs. Information obtained from these interviews helped establish context for the communities in which Minster operates and supplement information on the bank's performance. More detailed information obtained from these contacts is included in the Description of the Institution's Operations section for each full-scope assessment area.

DESCRIPTION OF INSTITUTION

Minster is an intrastate community bank and is a banking subsidiary of Minster Financial Corp. Both entities are headquartered in Minster, Ohio. Minster has total assets of \$674.0 million and total deposits of \$597.4 million as of June 30, 2021. Minster accounted for 100.0% of the holding company's consolidated assets. In addition to its main office, Minster has seven branches. The main office and seven branches have full-service ATMs. Since the previous evaluation, Minster opened a new branch and closed its loan production office in Dayton, Ohio, effective July 15, 2020. There have been no branch closings since the previous CRA evaluation.

Minster's website, MinsterBank.com, and online and mobile banking supplements its branch and ATM networks. Customers can look up balances, confirm what transactions have posted, transfer funds, and make loan payments; and visitors can open a deposit account and apply online. Minster also offers customers Bill Pay, Zelle®, Mobile Deposit Capture, Alerts, eStatements, and Mobile Wallet. Minster participates in the MoneyPass® network, which gives customers access to over 25,000 surcharge-free ATMs nationwide. According to bank management, Minster's online and mobile banking enrollment has increased in the last year, especially mobile banking. Online and mobile banking enrollments increased 11.3% year-over-year, with mobile logins increasing 17.2% and mobile deposits increasing 82.3%. Zelle® usage increased 81.9% during the same period. Approximately, 5,330 (64.0%) of the bank's customers that use online banking are enrolled in mobile banking and use bill pay. Nearly 11,750 (86.0%) of customers who accessed Minster's online and/or mobile banking delivery systems are in Nonmetropolitan Ohio and the remaining 1,880 (14.0%) are in the Dayton AA. Approximately 5.0% of customers accessing these delivery systems are in LMI geographies across the AAs.

As a full-service retail bank, Minster offers traditional bank products such as: deposit and checking accounts, commercial, residential real estate, agricultural, and consumer loans. Minster also offers America Saves accounts, which encourages and supports LMI households to save money, reduce debt, and build personal wealth. The following table shows the percentage of America Saves accounts by income-tract designation compared to the percentage of households. These specialized deposit accounts help meet banking service needs, particularly in moderate-income geographies in Nonmetropolitan Ohio and Dayton AAs.

Geographic Distribution America Saves Accounts						
Income Tract Level	Nonmetropolitan Ohio			Dayton MSA		
	#	%	% Households*	#	%	% Households*
Low				0	0.0%	11.0%
Moderate	5	6.0%	5.5%	1	16.7%	20.9%
Middle	22	26.2%	34.2%	4	66.7%	48.3%
Upper	50	67.8%	60.3%	1	16.6%	19.8%
Totals	77	100.0%	100.0%	6	100.0%	100.0%

* 2015-2019 U.S. Census Bureau: American Community Survey

The following table displays the loan portfolio composition as of June 30, 2021. Based on lending volume, loans secured by non-farm non-residential real estate makes up most of Minster's originations, followed by one-to-four family residential real estate and commercial and industrial loans, respectively.

Composition of Loan Portfolio as of June 30, 2021		
Loan Type	\$(000)	%
Construction and Land Development	18,028	6.2
Farmland	23,980	8.3
1-4 Family Residential Real Estate	55,926	19.3
Multifamily Residential Real Estate	17,069	5.9
Non-Farm Non-Residential Real Estate	95,974	33.0
Agricultural	6,856	2.4
Commercial and Industrial	54,208	18.7
Consumer	3,074	1.1
Other	15,403	5.3
Gross Loans	290,518	100.0

Note: Percentages may not total 100.0 percent due to rounding.

Minster's investment portfolio as of June 30, 2021, was \$359.9 million, which represented 53.4% of total assets. Interest-bearing bank balances accounted for 43.9% of total investments, while U.S. treasury and agency securities and municipal securities comprised 28.1% and 16.0% of investments, respectively. The remaining 12.0% of investments consisted of all other securities and federal funds sold.

There are no known legal, financial or other factors impeding Minster's ability to help meet the credit needs of its communities.

Minster was rated "Satisfactory" under the CRA at its previous evaluation conducted May 16, 2016. The lending and community development tests were each rated "Satisfactory."

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Minster's overall CRA performance is rated "Satisfactory." Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

LENDING TEST

Minster's performance relative to the lending test is rated "Satisfactory" based on Minster's loan-to-deposit ratio, AA concentration, and borrower and geographic distribution.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses. Details of Minster's lending and information regarding lending by the aggregate of all lenders can be found in Appendix C.

Loan-to-Deposit Ratio

A financial institution's loan-to-deposit (LTD) ratio is evaluated to determine the reasonableness of lending considering performance context, such as Minster's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated FDIC-insured institutions (custom peer group). The custom peer group was selected based on asset size, market share, and the area where they are located.

Loan-to-Deposit Ratios							
Minster Bank, Minster, OH				The Greenville National Bank, Greenville, OH	Osgood State Bank, Osgood, OH	The Peoples Bank Co., Coldwater, OH	Custom Peer Ratio
As of Date	Net Loans \$(000s)	Total Deposits \$(000s)	Bank Ratio	Peer 1 Ratio	Peer 2 Ratio	Peer 3 Ratio	Custom Peer Ratio
June 30, 2021	285,595	597,433	47.8	64.2	75.4	47.8	62.5
March 31, 2021	302,167	604,396	50.0	65.8	76.7	48.5	63.7
December 31, 2020	296,320	560,977	52.8	69.7	76.8	48.5	65.0
September 30, 2020	307,042	532,251	57.7	76.4	86.3	56.0	72.9
June 30, 2020	304,189	523,547	58.1	77.1	87.0	57.8	74.0
March 31, 2020	245,538	459,943	53.4	81.9	84.0	63.5	76.5
December 31, 2019	256,157	450,848	56.8	84.8	79.1	64.6	76.2
September 30, 2019	239,978	445,848	53.8	86.9	76.4	58.3	73.8
June 30, 2019	240,476	434,355	55.4	90.7	79.4	59.0	76.4
March 31, 2019	234,491	428,034	54.8	89.6	75.7	59.4	74.9
December 31, 2018	239,464	427,201	56.1	93.2	76.3	60.9	76.8
September 30, 2018	242,058	414,937	58.3	91.1	78.7	62.0	77.3
June 30, 2018	239,753	416,338	57.6	89.6	82.4	60.4	77.5
March 31, 2018	233,156	419,139	55.6	88.7	82.5	60.1	77.1
December 31, 2017	240,100	416,081	57.7	89.7	82.5	59.1	77.1
September 30, 2017	229,213	408,124	56.2	89.3	80.6	60.4	76.8
June 30, 2017	226,832	398,448	56.9	88.8	73.0	59.2	73.6
March 31, 2017	227,787	409,853	55.6	83.9	74.0	57.8	71.9
December 31, 2016	236,056	407,812	57.9	85.4	71.9	53.3	70.2
September 30, 2016	228,082	398,867	57.2	83.4	67.6	52.9	68.0
June 30, 2016	229,896	380,252	60.5	83.1	67.0	52.5	67.5
March 31, 2016	227,172	389,868	58.3	79.7	62.0	53.0	64.9
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation			55.8	83.3	77.0	57.0	72.5

During this period, Minster’s LTD ratio averaged 55.8%, which was below the custom peer group average of 72.5%. According to bank management, Minster’s LTD ratio is impacted by the sale of eligible consumer mortgage loans on the secondary market. Minster sells these loans shortly after origination; therefore, these loans are only booked as bank assets for a short period of time. Selling these loans helps free up funds to provide additional loans to meet credit needs. Also, Minster, like other community banks, has seen a large increase in deposits due to direct payments to consumers and small businesses from various economic stimulus programs in response to the COVID-19 pandemic, along with low loan demand. As a result, deposit growth has significantly outpaced loan growth over the last five quarters, which has moved the bank’s LTD ratio downward. Therefore, Minster’s LTD ratio is considered reasonable.

Assessment Area Concentration

Minster’s HMDA lending in 2016 to 2017 was analyzed to determine the volume of lending inside and outside the bank’s AA. Of Minster’s total HMDA lending, 89.5%, by volume and 88.8% of total dollar amount were made inside the AA.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	17	100.0	\$1,075	100.0	0	0.0	\$0	0.0
Home Purchase - Conventional	346	89.2	\$50,794	89.3	42	10.8	\$6,077	10.7
Multi-Family Housing	9	90.0	\$4,654	87.8	1	10.0	\$646	12.2
Refinancing	146	89.0	\$22,501	87.3	18	11.0	\$3,283	12.7
Total HMDA related	518	89.5	\$79,024	88.8	61	10.5	\$10,006	11.2
TOTAL LOANS	518	89.5	\$79,024	88.8	61	10.5	\$10,006	11.2

Note: Affiliate loans not included

For the lending period of 2018 to 2020; Minster’s consumer, HMDA, home equity, small business, and small farm lending was analyzed to determine the volume of lending inside and outside the AAs. Of Minster’s total lending, 91.0%, by volume and 85.7% of total dollar amount were made inside the AAs. Minster experienced a substantial increase in HMDA loans between 2019 and 2020 due to originating a number of refinance loans due to lower interest rates.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Motor Vehicle	80	95.2	\$1,345	96.3	4	4.8	\$52	3.7
Other - Unsecured	3	75.0	\$58	93.3	1	25.0	\$4	6.7
Total Consumer related	83	94.3	\$1,403	96.2	5	5.7	\$56	3.8
Home Improvement	8	100.0	\$517	100.0	0	0.0	\$0	0.0
Home Purchase - Conventional	437	89.7	\$77,191	88.3	50	10.3	\$10,241	11.7
Multi-Family Housing	22	78.6	\$13,858	60.5	6	21.4	\$9,037	39.5
Other Purpose Closed-End	18	78.3	\$1,754	68.2	5	21.7	\$819	31.8
Refinancing	387	92.6	\$67,954	91.4	31	7.4	\$6,407	8.6
Total HMDA related	872	90.5	\$161,274	85.9	92	9.5	\$26,504	14.1
Home Equity	107	99.1	\$7,566	99.0	1	0.9	\$75	1.0
Total Non-HMDA	107	99.1	\$7,566	99.0	1	0.9	\$75	1.0
Small Business	501	90.1	\$94,553	86.6	55	9.9	\$14,643	13.4
Total Small Bus. related	501	90.1	\$94,553	86.6	55	9.9	\$14,643	13.4
Small Farm	23	85.2	\$4,260	54.8	4	14.8	\$3,515	45.2
Total Small Farm related	23	85.2	\$4,260	54.8	4	14.8	\$3,515	45.2
TOTAL LOANS	1,586	91.0	\$269,056	85.7	157	9.0	\$44,793	14.3

Note: Affiliate loans not included

Therefore, a majority of Minster’s loans by both volume and dollar amount were made inside its AAs.

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

This performance criterion evaluates Minster’s lending to borrowers of different income levels and businesses of different revenue sizes. Minster’s lending has an overall reasonable distribution among individuals of different income levels and businesses of different sizes.

From April to August 2020, Minster originated 402 PPP loans totaling \$63.0 million in middle- and upper-income tracts, of which 360 (89.6%) totaling \$58.5 million (92.8%) were made inside the bank’s AAs and evaluated based on the borrower and geographic income distribution for each AA. However, banks were not required to collect revenue data for PPP loans, since the intent of the PPP is to assist small businesses; therefore, these unique circumstances affecting borrowers and banks resulting from the COVID-19 emergency will be considered in this evaluation. As a result, the borrower distribution performance to businesses of different sizes will not receive much weight, since gross annual revenue information was not available for a large percentage of Minster’s small business loans.

Minster originates loans under the Freddie Mac Home Possible program, which is designed to help LMI borrowers qualify for a mortgage loan with flexible credit options and affordable monthly payments. Minster also works with the Federal Home Loan Bank (FHLB) of Cincinnati, which offers \$5,000 grants under its Welcome Home Program (WHP) to provide down payment

assistance and/or low closing costs for LMI homebuyers. Refer to the respective Conclusions with Respect to Performance Tests sections of this evaluation for more details.

Geographic Distribution of Loans

This performance criterion evaluates Minster's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. Minster's overall geographic distribution of loans reflects a reasonable dispersion throughout the AAs.

Because Minster opted to include its PPP loans in LMI tracts in amounts of \$1.0 million or less for consideration under the community development test, the geographic distribution largely skewed towards the middle- and upper-income tracts, this will be taken into consideration in this evaluation.

Minster deferred loan payments to 153 small businesses, 23 small farms, and 11 consumers impacted by the COVID-19 emergency, of which seven (3.7%) deferrals helped small businesses in LMI tracts across the AAs. Also, 90.4% of deferred loan payments benefitted customers in Nonmetropolitan Ohio and 9.6% in the Dayton MSA.

Response to Complaints

Neither Minster nor this Reserve Bank has received any CRA-related complaints since the previous examination.

COMMUNITY DEVELOPMENT TEST

Minster's performance relative to the community development test is rated "Outstanding" based on Minster's excellent responsiveness to community development needs of its AAs through community development loans, qualified investments and donations, and community development services, considering the bank's capacity and the need and availability of such opportunities for community development in Minster's AAs.

Primarily, Minster made community loans to small businesses in LMI geographies through the PPP loan program and non-profits enabling them to increase their capacity to serve LMI individuals and families. These loans are considered responsive to credit needs of small businesses and LMI people disproportionality impacted by the COVID-19 emergency. Minster also made a qualified Low-Income Housing Tax Credit (LIHTC) investment supporting affordable housing. This type of investment is considered particularly complex, taking substantial knowledge and time commitment to properly and is responsive to community development needs in the AAs, considering the critical need for all aspects of affordable housing noted by the community contacts. Minster's employees also provided financial literacy education to students,

including LMI students grades K-12 and financial expertise to several local non-profits and community organizations across its AAs.

Community Development Lending

During the evaluation period, Minster made 66 community development loans, totaling \$7.1 million. Of Minster's total community development loans by dollar amount, 37.3% benefitted Nonmetropolitan Ohio and 62.7% benefitted the Dayton AA.

From April to August 2020, Minster originated 61 PPP loans, totaling \$5.3 million to small businesses in LMI tracts within its delineated CRA footprint in response to the COVID-19 emergency.² These loans helped to stabilize small business operations and retain workforce in LMI communities impacted by the pandemic. Minster also made five community development loans, totaling \$1.8 million, primarily supporting organizations that provide wraparound services to LMI individuals and families.

Community Development Investments

During the evaluation period, Minster made a new investment in a LIHTC worth \$500,000, which supports affordable housing initiatives in broader statewide area, including counties in the bank's AAs.

Minster also made 57 qualified donations totaling \$83,713, including two donations totaling \$800 (1.0%) to an organization that promotes affordable housing in Miami and Shelby counties. Of Minster's total qualified donations by dollar amount, 9.4% benefitted Nonmetropolitan Ohio and 89.6% benefitted the Dayton AA. The bank's contributions helped support 30 organizations that provide a variety of community services targeted to LMI individuals and families, promote economic development, and fund affordable housing initiatives.

Lastly, because Minster was responsive to credit needs in its AAs, consideration was given to five current period municipal school bonds worth \$1.8 million and three prior period municipal school bonds with a book value of \$427,572. These bonds provide needed capital to schools serving majority LMI student bodies in a broader statewide area.

Community Development Services

During the evaluation period, 19 employees delivered 26 services totaling at least 913 hours of community development services to 23 different organizations that provide a multitude of services throughout the AA. Employees provided leadership, financial, and/or technical

²Minster also originated two PPP loans totaling \$99,933 to small businesses in LMI geographies in a broader statewide area that does not include the bank's AAs.

expertise to various community organizations that offer services to LMI individuals and families and promote economic development or affordable housing. Community development services include 523 hours serving on boards and/or committees and 390 hours providing technical expertise. Across its AAs 20 employees provided at least 122 hours of financial literacy education to 4,687 students in 16 schools, of which three schools had majority student bodies (878 students) eligible for the free-and reduced-lunch program.

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

Board and Committee Memberships – Minster’s officers and managers provided financial expertise through their involvement with community development organizations throughout the assessment areas by serving as board directors, loan committee members, or treasurers.

Technical Assistance – Employees provided technical assistance which included fund raising, budgeting, and loan application requests/approvals.

Financial Education – Minster uses American Bankers Association course content for in-person programs, and Banzai’s online courses for teaching financial literacy and provides all associated classroom materials and in-person instruction. Financial literacy topics include but are not limited to financial responsibility and decision making, planning and money management, informed consumer decision making, and credit and debt management tools.

Refer to the respective Conclusions with Respect to Performance Tests sections of this evaluation for more details regarding these community development activities.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

NONMETROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN
NONMETROPOLITAN OHIO**

The Nonmetropolitan Ohio AA consists of the entireties of Auglaize, Mercer, and Shelby counties. Since the previous evaluation period, Minster removed Darke County from this AA. No middle-income census tracts in this AA were designated as distressed or underserved as defined by the Federal Financial Institutions Examination Council (FFIEC)³ during this evaluation period. The AA was comprised of the following income-tract designations during the evaluation period.

Income Tract Level	2016-2020
Low	0
Moderate	2
Middle	11
Upper	17
Total	30

Minster operates its main office and five branches with full-service ATMs in Nonmetropolitan Ohio. The main office and four branches are in Minster,⁴ New Bremen, and St. Mary’s (Auglaize County) and Sidney (Shelby County) in upper-income tracts. The remaining branch is in Wapakoneta (Auglaize County) in a middle-income tract. All offices in this AA offer weekend and extended hours of service; and the main office and four branches also have drive-thrus. Additionally, Minster partners with a local non-profit to help ex-offenders open bank accounts and gain access to banking services, a fundamental necessity to help them re-adjust to life in the community.

According to the June 30, 2021, Federal Deposit Insurance Corporation’s (FDIC) Summary of Deposits Report, Minster ranked third amongst 18 institutions operating in this AA with a 12.7% deposit market share. The Peoples Bank Co. and U.S. Bank, National Association hold a 14.3% and 13.1% deposit market share, respectively. Minster ranked second amongst 14 institutions with a 21.1% deposit market share in the counties where its branches are located. Deposits at \$516.1 million in this AA account for 86.4% of Minster’s total deposits.

The 2020 HMDA Peer Market data indicates that Minster ranked second out of 207 HMDA reporters in this AA and originated 296 loans. By comparison, first ranked Superior Credit Union originated 1,002 loans and third ranked U.S. Bank, National Association originated 227 loans.

³ FFIEC Distressed and Underserved Tracts - <https://www.ffiec.gov/cra/distressed.htm>

⁴ The main office and Wagner’s IGA Office (no drive-thru) are in Minster, Ohio.

Community Contacts

A community contact interview was conducted to provide supplemental information regarding the area’s credit needs and context to demographic and economic conditions of the local community. The interview was with a representative from a community resource center that connects LMI individuals and families with essential resources. The contact stated the lack of accessible and reliable public transportation and affordable housing are critical needs in the community; as such, there are opportunities for banks to provide funding for these issues. The contact explained that due to the lack of public transit, individuals are essentially forced to rely on car ownership, which can be costly. The contact stated that reliable transportation is vital for access to employment and community services. The contact explained there is a lack of affordable housing, and the low supply is contributing to higher home prices and rental rates in the area. Affordable housing stock tends to be older and substandard and property owners’ incomes may be insufficient to adequately maintain these properties. Therefore, individuals pay higher rental costs for better quality housing, and rising rental rates make it challenging for lower-income individuals to save enough for a down payment to purchase a home. Lastly, the contact specifically mentioned Minster as being actively involved and responsive to credit and community needs.

Population Characteristics

Population Change			
Assessment Area: Nonmetropolitan Ohio			
Area	2015 Population	2020 Population	Percent Change
Assessment Area	135,803	135,291	-0.4
Auglaize County	45,873	45,680	-0.4
Mercer County	40,863	41,274	1.0
Shelby County	49,067	48,337	-1.5
Ohio	11,575,977	11,693,217	1.0
Source: 2011-2015 U.S. Census Bureau: American Community Survey U.S. Census Bureau Vintage 2020 Population Estimates for the United States and States			

- From 2015 through 2019 the AA experienced slight loss in population at 0.4%, compared to Ohio with a growth rate of 1.0%.
- Over the next 20 years population in the AA is projected to decrease by at least 2.0%.
- 74.5% of AA population was 18 years of age or older, the legal age to enter into a contract.
- 16.5% and 16.4% of the population was age 65 and over in Auglaize and Mercer counties, compared to 14.1% in Shelby County and 15.1% in Ohio; which means Auglaize and Mercer counties have smaller working- and consumer-age populations and decreased economic activity.
- 5.4% of the population resides in the AA’s moderate-income tracts.

- The largest municipalities in the AA are the cities of Sidney (Shelby County), with population of 20,449; Celina (Mercer County), with population of 10,425; and Wapakoneta and St. Marys (Auglaize County), with populations of 9,698 and 8,160, respectively.⁵

Income Characteristics

Borrower Income Levels														
Assessment Area: Nonmetropolitan Ohio														
FFIEC Estimated Median Family Income			Low			Moderate			Middle			Upper		
Year	\$	% Change	0	-	49.9%	50%	-	79.9%	80%	-	119.9%	120%	-	& above
2016	\$55,400		0	-	\$27,699	\$27,700	-	\$44,319	\$44,320	-	\$66,479	\$66,480	-	& above
2017	\$57,600	4.0%	0	-	\$28,799	\$28,800	-	\$46,079	\$46,080	-	\$69,119	\$69,120	-	& above
2018	\$61,400	6.6%	0	-	\$30,699	\$30,700	-	\$49,119	\$49,120	-	\$73,679	\$73,680	-	& above
2019	\$61,000	-0.7%	0	-	\$30,499	\$30,500	-	\$48,799	\$48,800	-	\$73,199	\$73,200	-	& above
2020	\$63,400	3.9%	0	-	\$31,699	\$31,700	-	\$50,719	\$50,720	-	\$76,079	\$76,080	-	& above

Source: 2016-2020 FFIEC Census Data

- During the evaluation period, the median family income (MFI) in the AA increased each year, except in 2019; but experienced an overall increase of 14.4% during this span.
- According to 2018 U.S. Census data estimates, Auglaize, Shelby, and Mercer counties ranked 16th, 17th, and 20th in Ohio with MFIs at \$61,758, \$61,042, and \$59,417, respectively.

Poverty Rates			
Assessment Area: Nonmetropolitan Ohio			
Area	2017	2018	2019
Auglaize County	8.7	6.9	7.3
Mercer County	6.9	7.6	6.7
Shelby County	8.1	9.0	9.1
Ohio	13.9	13.8	13.0
United States	13.4	13.1	12.3

Source: U.S. Census Bureau Small Area Income and Poverty Estimates Program

- While poverty rates in the AA fluctuated, the AA's poverty rates were considerably lower than the poverty rates across Ohio and the nation from 2017 through 2019.
- Of the 36,944 families in the AA, 29.3% are designated as LMI, with 6.3% living below poverty level; compared to 38.9% of families in Ohio designated as LMI, with 11.5% living below poverty level.
- Of the 52,649 households in the AA, 9.2% are below poverty and 2.1% receive public assistance.

⁵ www.development.oh.gov/reports_countytrends_map

Housing Characteristics

Housing Cost Change Assessment Area: Nonmetropolitan Ohio										
Area	Median Housing Value					Median Gross Rent				
	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019
Auglaize County	\$125,000	\$133,300	6.6	\$147,300	10.5	\$639	\$642	0.5	\$729	13.6
Mercer County	\$125,600	\$130,200	3.7	\$153,800	18.1	\$606	\$653	7.8	\$679	4.0
Shelby County	\$124,500	\$130,000	4.4	\$145,600	12.0	\$659	\$684	3.8	\$733	7.2
Ohio	\$136,400	\$129,900	-4.8	\$145,700	12.2	\$678	\$730	7.7	\$808	10.7
<small>Source: 2006-2010 U.S. Census Bureau: American Community Survey 2011-2015 U.S. Census Bureau: American Community Survey 2015-2019 U.S. Census Bureau: American Community Survey</small>										

- While median housing values increased significantly from 2010-2019, housing became more affordable across the AA, primarily due to the increasing MFI. The affordability ratio⁶ went from 40.1 in 2010 to 40.8 in 2015 to 42.8 in 2019.
- Median gross rents across the AA increased by 12.0% on average from 2010-2019. The rise in median gross rents indicates the need for more affordable housing, considering the larger percentage of low- and moderate-income families dependent upon the rental market.
- There are 57,487 housing units in the AA and 67.5% are owner occupied, 24.1% are rental, and 8.4% are vacant, compared to 3,503 (6.1%) of housing units in moderate-income tracts of which 37.5% are owner-occupied, 44.7% are rental, and 17.8% are vacant.
- With 62.5% of housing units being either rental or vacant, there appears to be limited opportunities to originate home mortgage loans in moderate-income tracts.
- The median age of housing stock in the AA is 50 years old, and 26.8% of housing units were built prior to 1950 (over 70 years old). The age of the housing stock across the AA may indicate a need for home improvement lending and for refinance or home improvement loans to remove lead-based paint which was commonly used on houses and apartments built before 1978.⁷

⁶ The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

⁷ Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning

Housing Cost Burden Assessment Area: Nonmetropolitan Ohio						
Area	Cost Burden – Owners			Cost Burden – Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Assessment Area	56%	25%	16%	70%	16%	33%
Auglaize County	53%	23%	16%	67%	12%	31%
Mercer County	53%	22%	15%	66%	11%	35%
Shelby County	62%	30%	17%	77%	21%	33%
Ohio	64%	35%	20%	74%	32%	43%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey

- Nearly 56.0% of low-income homeowners and 70.0% of low-income renters are cost burdened, compared to 25.0% of moderate-income homeowners and 16% of moderate-income renters.
- 16.0% of homeowners across the AA are cost burdened, which is less than homeowners across Ohio at 20.0%.
- 33.0% of renters across the AA are cost burdened, which is less than renters across Ohio at 43.0%.
- The data shows that cost burden disproportionately affects renter-occupied households, particularly low-income renter-occupied households.
- Based on the increasing home values and rental rates; LMI individuals, particularly those who are cost burdened, may have a difficult time saving enough to make a sufficient down payment or afford increasing rents.

Building Permits by Number of Units Assessment Area: Nonmetropolitan Ohio					
Area			% Change between 2018 and 2019		
	2018	2019		2020	% Change between 2019 and 2020
Auglaize County	110	117	6.4	176	50.4
Mercer County	138	60	-56.5	113	88.3
Shelby County	53	49	-7.5	77	57.1
Ohio	24,221	23,047	-4.8	29,686	28.8
United States	1,328,827	1,386,048	4.3	1,471,141	6.1

Source: U.S. Census Bureau Building Permits Survey

- Building permits are a leading indicator of future activity in the construction sector. From 2018-2020, building permits in Auglaize and Shelby counties significantly increased.
- The increase of building permits could indicate an increasing demand for home purchase loans, particularly in Auglaize and Shelby counties.

Labor, Employment and Economic Characteristics

Unemployment Rates					
Assessment Area: Nonmetropolitan Ohio					
Area	2016	2017	2018	2019	2020
Assessment Area	3.7%	3.6%	3.3%	3.1%	6.7%
Auglaize County	3.8%	3.7%	3.3%	3.0%	6.9%
Mercer County	3.3%	3.1%	2.7%	2.6%	5.4%
Shelby County	4.2%	4.1%	3.8%	3.6%	7.7%
Ohio	5.0%	5.0%	4.5%	4.2%	8.1%

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- While 2016-2019 unemployment rates decreased across the AA, 2020 unemployment rates increased by 3.6 percentage points in response to the COVID-19 pandemic.
- Unemployment rates across the AA were consistently below Ohio’s rates during this period.
- According to Ohio Office of Research:⁸
 - Land use in Auglaize, Mercer, and Shelby counties is primarily rural with less than 10.0% available for urban (i.e., residential, commercial, industrial, or recreational) development.
 - Auglaize County is most impacted by the industries of manufacturing; trade, transportation, and utilities; education and health services; local government; and leisure and hospitality. Major employers include but are not limited to American Trim, ContiTech/Veyance Technologies, Crown Equipment, Dannon Company, JTD Health Systems, KN Rubber, Kosei St. Mary’s Corp., Nidec Minster, Setex Inc., St. Mary’s City Schools, and Wapakoneta City Schools. The average weekly wage for the private sector is \$874, which indicates that employed persons could afford the median rent of \$729.
 - Mercer County is most impacted by the industries of manufacturing; trade, transportation, and utilities; local government; education and health services; and leisure and hospitality. Major employers include but are not limited to Celina Aluminum Precision Technology, Celina City Schools, Cooper Farms, Crown Equipment Corp., Fort Recovery Industries, Inc., J&M Manufacturing, Mercer Health Hospital, Pax Machine Works, Reynolds & Reynolds Company, Taylor communications, and Visions/Awardcraft. The average weekly wage for the private sector is \$774, which indicates that employed persons could afford the median rent of \$679.

⁸ www.development.oh.gov/reports_countytrends_map

- Shelby County is most impacted by the industries of manufacturing; trade, transportation, and utilities; local government; education and health services; and leisure and hospitality. Major employers include but are not limited to Airstream, American Trim, Cargill, Emerson Climate Technologies, Freshway Foods, Honda Motor Company, NK Parts Industries, Inc., Plastipak Packaging, Inc., Ross Casting and Innovation, Shelby County Government, Sidney City Schools, Wal-Mart Stores, Inc., and Wilson Memorial Hospital. The average weekly wage for the private sector is \$983, which indicates that employed persons could afford the median rent of \$733.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN OHIO

LENDING TEST

The lending test performance in Nonmetropolitan Ohio is reasonable. Details of Minster's lending can be found in the tables in Appendix C.

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

Minster's lending penetration among borrowers of different income (including LMI) levels and to businesses of different sizes in the Nonmetropolitan Ohio is considered reasonable.

The borrower distribution performance to businesses of different sizes in 2020 will not receive much weight, since gross annual revenue information was not available for a large percentage of Minster's small business loans. Most of these loans were PPP loans, and banks were not required to collect revenue data for PPP loans.

During the evaluation period, Minster originated 20 loans (\$2.4 million) under the Freddie Mac Home Possible loan program and 29 grants (\$145,000) under the FHLB of Cincinnati's WHP to 39 qualified LMI borrowers in Nonmetropolitan Ohio. The Home Possible loan program is designed to help LMI borrowers qualify for a mortgage loan with flexible credit options and affordable monthly payments, and the Welcome Home grants of \$5,000 provide down payment assistance and/or low closing costs for LMI homebuyers. The community contact stressed the critical need for all aspects of affordable housing.

HMDA Lending

During the evaluation period Minster made 935 HMDA loans totaling \$152.7 million comprised of 522 home purchase and 373 refinance loans totaling \$80.1 million and \$62.6 million, respectively. Minster's performance was compared to the percentage of families (proxy) and the aggregate of all lenders. Minster's borrower distribution of HMDA loans is reasonable.

Home Purchase Lending

Minster made 92 home purchase loans totaling \$16.4 million in 2020. Minster also made two (2.2%) home purchase loans to borrowers with unknown-income designations. Minster originated two (2.2%) home purchase loans to low-income borrowers, which was significantly below the percentage of families at 13.0% and the aggregate of all lenders at 6.6%. Minster originated 14 (15.2%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 16.3% and the aggregate of all lenders at 26.9%.

Minster made 96 home purchase loans totaling \$15.8 million in 2019. Minster also made six (6.3%) home purchase loans to borrowers with unknown-income designations. Minster originated five (5.2%) home purchase loans to low-income borrowers, which was below the percentage of families at 13.0% and the aggregate of all lenders at 5.9%. Minster originated 17 (17.7%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 16.3% and was below the aggregate of all lenders at 22.2%.

Minster made 105 home purchase loans totaling \$17.3 million in 2018. Minster also made four (3.8%) home purchase loans to borrowers with unknown-income designations. Minster originated five (4.8%) home purchase loans to low-income borrowers, which was below the percentage of families at 13.2% and the aggregate of all lenders at 5.7%. Minster originated 20 (19.0%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 16.5% but was below the aggregate of all lenders at 25.5%.

Minster made 93 home purchase loans totaling \$11.9 million in 2017. Minster also made five (5.4%) home purchase loans to borrowers with unknown-income designations. Minster originated four (4.3%) home purchase loans to low-income borrowers, which was below the percentage of families at 13.2% and the aggregate of all lenders at 5.3%. Minster originated 21 (22.6%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 16.5% but was below the aggregate of all lenders at 24.7%.

Minster made 136 home purchase loans totaling \$18.7 million in 2016. Minster also made six (4.4%) home purchase loans to borrowers with unknown-income designations. Minster originated three (2.2%) home purchase loans to low-income borrowers, which was significantly below the percentage of families at 13.4% and the aggregate of all lenders at 4.9%. Minster originated 30 (22.1%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 16.7% and the aggregate of all lenders at 20.9%.

Performance mostly fell below the comparators for low-income borrowers and exceeded the comparators for moderate-income borrowers. Considering nearly 56.0% of low-income homeowners and 70.0% of low-income renters are cost burdened; LMI individuals, particularly low-income individuals, may have a difficult time saving enough for a down payment to purchase a home. Therefore, borrower distribution for home purchase lending is reasonable to LMI borrowers.

Refinance Lending

Minster made 197 refinance loans totaling \$34.2 million in 2020. Minster also made 10 (5.1%) refinance loans to borrowers with unknown-income designations. Minster originated six (3.0%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 13.0% and comparable to the aggregate of all lenders at 3.3%. Minster originated 19 (9.6%) refinance loans to moderate-income borrowers, which was below the percentage of

families at 16.3% and the aggregate of all lenders at 12.9%.

Minster made 53 refinance loans totaling \$9.8 million in 2019. Minster also made two (3.8%) refinance loans to borrowers with unknown-income designations. Minster originated no refinance loans to low-income borrowers, compared to the percentage of families at 13.0% and the aggregate of all lenders at 7.3%. Minster originated three (5.7%) refinance loans to moderate-income borrowers, which was significantly below the percentage of families at 16.3% and the aggregate of all lenders at 13.7%.

Minster made 78 refinance loan totaling \$11.9 million in 2016. Minster also made one (1.3%) refinance loans to borrowers with unknown-income designations. Minster originated three (3.8%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 13.4% and below the aggregate of all lenders at 4.5%. Minster originated six (7.7%) refinance loans to moderate-income borrowers, which below the percentage of families at 16.7% and the aggregate of all lenders at 11.6%.

Overall performance was comparable to the percentage of families and aggregate of all lenders, particularly in 2020 the year with the most lending activity. Therefore, borrower distribution for refinance lending is reasonable to LMI borrowers.

Small Business Lending

In 2020 Minster made 346 small business loans totaling \$66.4 million to businesses of different sizes, of which 76.9% were PPP loans. As a result, there were 266 (76.9%) loans totaling \$44.1 million made to businesses with unknown gross annual revenues and 61 (17.6%) loans totaling \$8.7 million made to businesses with revenues of less than \$1.0 million, compared to the percentage of small businesses at 87.4%.

Minster made 62.1% of its small dollar loans in amounts of \$100,000 or less. This indicates the bank's willingness to lend in smaller amounts that tend to represent amounts typically requested by small businesses, particularly small businesses impacted by the COVID-19 emergency.

While this analysis was skewed by the large percentage of businesses with unknown gross annual revenues, Minster's willingness to lend in smaller amounts exhibits responsiveness to credit needs of small businesses in the AA. The need for access to capital, especially for small businesses, is critical for new businesses to start and existing businesses to expand. If PPP loans were excluded from the analysis, 75.3% of the bank's loans were made to businesses with revenues of less than \$1.0 million. Therefore, Minster's distribution to businesses of different sizes is reasonable.

Home Equity Lending

Minster made 79 home equity loans totaling \$4.8 million in 2020. Minster also made one (1.3%) home equity loan to borrowers with unknown-income designations. Minster originated nine (11.4%) home equity loans to low-income borrowers, which was below the percentage of families at 13.0%. Minster originated nine (11.4%) home equity loans to moderate-income borrowers, which was below the percentage of families at 16.3%. Therefore, the borrower distribution of home equity loans is reasonable to LMI borrowers.

Consumer Lending (Motor Vehicle)

Minster made 70 motor vehicle loan totaling \$1.2 million in 2020. Minster originated 11 (15.7%) motor vehicle loans to low-income borrowers, which was below the percentage of households at 17.0%. Minster originated 17 (24.3%) motor vehicle loans to moderate-income borrowers, which exceeded the percentage of households at 15.0%. The borrower distribution of motor vehicle lending is reasonable to low-income borrowers and excellent to moderate-income borrowers, especially considering the critical need for access to reliable transportation stated by the community contact.

Geographic Distribution of Loans

Minster’s geographic distribution reflects a reasonable dispersion of loans in Nonmetropolitan Ohio. Minster has a low level of lending gaps.

Percentage of Lending Penetration					
Tract Income Level	2016	2017	2018	2019	2020
Moderate	100.0%	100.0%	100.0%	100.0%	100.0%
Middle	88.2%	81.8%	90.9%	90.9%	100.0%
Upper	90.9%	94.1%	88.2%	88.2%	100.0%
Total	90.0%	90.0%	90.0%	90.0%	100.0%

Minster penetrated 100.0% of its moderate-income tracts and a majority of its middle- and upper-income tracts each year of the evaluation period.

HMDA Lending

During the evaluation period Minster made 935 HMDA loans totaling \$152.7 million, including 522 home purchase and 373 refinance loans totaling \$80.1 million and \$62.6 million, respectively. Minster’s performance was compared to the percentage of owner-occupied units by tract income (proxy) and the aggregate of all lenders. Minster’s geographic distribution of HMDA loans is reasonable.

Home Purchase Lending

Minster made 92 home purchase loans totaling \$16.4 million in 2020. Minster originated one (1.1%) home purchase loan in moderate-income tracts, which was significantly below the percentage of owner-occupied units at 3.4% and the aggregate of all lenders at 6.2%.

Minster made 96 home purchase loans totaling \$15.8 million in 2019. Minster originated three (3.1%) home purchase loans in moderate-income tracts, which was comparable to the percentage of owner-occupied units at 3.4% and below the aggregate of all lenders at 7.6%.

Minster made 105 home purchase loans totaling \$17.3 million in 2018. Minster originated two (1.9%) home purchase loans in moderate-income tracts, which was below the percentage of owner-occupied units at 3.4% and the aggregate of all lenders at 5.4%.

Minster made 93 home purchase loans totaling \$11.9 million in 2017. Minster originated six (6.5%) home purchase loans in moderate-income tracts, which exceeded the percentage of owner-occupied units at 3.4% and the aggregate of all lenders at 5.9%.

Minster made 136 home purchase loans totaling \$18.7 million in 2016. Minster originated seven (5.1%) home purchase loans in moderate-income tracts, which exceeded the percentage of owner-occupied units at 4.7% and the aggregate of all lenders at 4.7%.

Minster's home purchase lending performance varied in moderate-income tracts compared to the percentage of owner-occupied units and the aggregate of all lenders; therefore, the geographic distribution of home purchase lending is reasonable.

Refinance Lending

Minster made 197 refinance loan totaling \$34.2 million in 2020. Minster originated five (2.5%) refinance loans in moderate-income tracts, which was below the percentage of owner-occupied units at 3.4% and exceeded the aggregate of all lenders at 2.3 %.

Minster made 53 refinance loan totaling \$9.8 million in 2019. Minster originated no refinance loans in moderate-income tracts, compared to the percentage of owner-occupied units at 3.4% and the aggregate of all lenders at 3.3 %.

Minster made 78 refinance loan totaling \$11.9 million in 2016. Minster originated three (3.8%) refinance loans in moderate-income tracts, which was below the percentage of owner-occupied units at 4.7% and the aggregate of all lenders at 4.1%.

Minster's refinance lending performance varied in moderate-income tracts compared to the percentage of owner-occupied units and the aggregate of all lenders. Therefore, the geographic

distribution of refinance lending is reasonable.

Small Business Lending

Minster made 346 small business loans totaling \$66.4 million in 2020. Minster originated seven (2.0%) small business loans in moderate-income tracts, which was well below the percentage of businesses in these tracts at 7.7%. However, since Minster opted to include its PPP loans in LMI tracts in amounts of \$1.0 million or less for consideration under the community development test, the geographic distribution largely skewed towards the middle- and upper-income tracts. If PPP loans were excluded from the analysis, the percentage of small business loans in moderate-income tracts was 8.8%, which exceeded proxy. Therefore, the geographic distribution of small business loans is excellent.

Home Equity Lending

Minster made 79 home equity loans totaling \$4.8 million in 2020. Minster originated one (1.3%) home equity loan in a moderate-income tract, which was below the percentage of owner-occupied units at 3.4%. Therefore, the geographic distribution of home equity loans is poor.

Consumer Lending (Motor Vehicle)

Minster made 70 motor vehicle loans totaling \$1.2 million in 2020. Minster originated one (1.4%) motor vehicle loan in a moderate-income tract, which was below the percentage of households at 5.5%. Therefore, the geographic distribution of motor vehicle loans is poor.

COMMUNITY DEVELOPMENT TEST

Minster's community development performance demonstrates excellent responsiveness to community development needs in Nonmetropolitan Ohio through community development loans, qualified investments, and community development services.

Primarily, Minster made community loans to small businesses in LMI geographies through the PPP loan program and non-profits enabling them to increase their capacity to serve LMI individuals and families. These loans are considered responsive to credit needs of small businesses and LMI people disproportionality impacted by the COVID-19 emergency. Other community development activities supported organizations and non-profits that provide services to LMI individuals and families and promote economic development and affordable housing initiatives. Minster also provided financial literacy education, including to LMI students grades K-12.

Community Development Lending

Minster originated 32 community development loans totaling \$2.6 million in Nonmetropolitan Ohio, which represents 37.3% of Minster’s total community development lending by dollar amount during this evaluation period. Thirty-one community development loans, totaling \$2.5 million, were PPP loans made in response to the COVID-19 crisis to help local small businesses in LMI communities remain open and retain their workforce. The remaining community development loan, totaling approximately \$188,300, was a construction loan to fund the expansion of a non-profit’s facility enabling them to provide more LMI individuals and families access to wraparound services, which was particularly important for LMI people disproportionality impacted by the pandemic.

Qualified Investments

Minster made 18 donations totaling \$7,875 to 10 organizations, which represents 9.4% of Minster’s total qualified donations by dollar amount during the evaluation period.

The contributions supported organizations that provide community services targeted to LMI individuals and families (including wraparound and crisis services, compassionate care, and fundraising) and promote economic development.

Community Development Services

Community Development Services				
CD Purpose	# Organizations	# Services	# Employees	# Hours
Services to LMI	11	13	9	402
Economic Development	4	4	4	128
Affordable Housing	1	2	2	40
Totals	16	19	15	570*
*CD service hours equate to 0.3 ANP Annualized Persons (ANP): Number qualified CD service hours divided by 2,000 work hours in a year				

During the evaluation period, 15 employees provided 19 services totaling at least 570 hours of community development services to 16 different organizations that provide a multitude of services throughout the AA. Employees provided leadership, financial, and/or technical expertise to multiple community organizations that offer services to LMI individuals and families and promote economic development or affordable housing. For example, two employees served on a committee that helps reduce impediments around providing affordable housing, one employee served on a revolving loan committee for small businesses, and another employee provided financial expertise to help attract new businesses to the area. Community development services include 355 hours serving on boards and/or committees and 215 hours

providing technical expertise. Also, 18 employees provided at least 111 hours of financial literacy training to 3,262 students in 11 schools, of which one school had a majority student body (25 students) eligible for the free-and reduced-lunch program.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN
DAYTON-KETTERING OH MSA #19430**

The Dayton AA consists of the entireties of Miami and Montgomery counties and excludes Greene County. This AA remains unchanged since the previous evaluation. Due to use of 2015 U.S. Census American Community Survey (ACS) data instead of 2010 U.S. Census data in 2017, the AA was comprised of the following income-tract designations during the evaluation period.

Census Tract Designations		
Assessment Area: Dayton, OH MSA #19430		
Income Tract Level	2016	2017-2020
Low	20	24
Moderate	44	39
Middle	77	76
Upper	32	34
Unknown	1	1
Total	174	174

The AA gained four low- and two upper-income tracts and lost five moderate- and one middle-income tracts between 2016 and 2017. There were no changes to unknown-income tracts.

Minster operates two branches with full-service ATMs in the Dayton AA. One branch is in Troy (Miami County) in a middle-income tract. In July 2020 Minster opened a branch and closed its loan production office in Dayton (Montgomery County) in a middle-income tract. Each office in this AA has a drive-thru and offers weekend and extended hours of service.

Additionally, Minster partners with the Miami Metropolitan Housing Authority, which participates in Ohio’s Section 8 Housing Choice Voucher program, by letting tenants make their monthly rental payments at the Troy branch. Minster accepts customer and non-customer payments; approximately 98 LMI tenants use this service each month. During the height of the COVID-19 pandemic, Minster was able to keep its drive-thru open for customers to continue to make their rental payments.

According to the June 30, 2021, FDIC Summary of Deposits Report, Minster ranked 17th amongst 27 institutions operating in the Dayton MSA with a 0.5% deposit market share. Fifth Third Bank, National Association holds the largest share of deposits in the market at 32.8%, followed by JPMorgan Chase Bank, National Association and PNC Bank, National Association at 17.6% and 12.4%, respectively. Minster ranked 15th amongst 26 institutions with a 0.6% deposit market share in the counties where its branches are located. Minster competes with multiple national and regional financial institutions, in addition to several community banks in this market. Deposits

at \$81.3 million in this AA account for 13.6% of Minster's total deposits.

The 2020 HMDA Peer Market data indicates that Minster ranked 38th out of 424 HMDA reporters in this AA and originated 129 loans. By comparison, first ranked Union Savings Bank originated 3,275 loans, second ranked Wright-Patt Credit Union, Inc. originated 2,551 loans, and third ranked Fifth Third Bank, National Association originated 1,318 loans.

Community Contacts

A community contact interview was conducted to provide additional information regarding the area's credit needs and context to demographic and economic conditions of the local community. The interview was with a representative from an organization that supports affordable housing initiatives in the Miami Valley. The contacted stressed that stable, quality, affordable housing is a critical need in the area. Presently there is fierce competition for a historically low inventory of homes for sale, resulting in soaring prices and first-time homebuyers being outbid by investors and buyers willing to pay over asking price. As a result, LMI homebuyers are being forced to remain in substandard and/or higher cost rental units and may not be able to save enough for an adequate down payment. The lower-priced housing market is dominated by older homes (> 50 years), typically owned by LMI and elderly homeowners who may not have the resources to make costly repairs and maintenance associated with aged housing stock. There is also an inadequate supply of moderate- and higher-priced homes, which limits the area's ability to attract higher-income households and sustain growth. The contact stated that while banks are generally responsive to community needs, there are opportunities for local financial institutions to do more to address the area's ongoing housing needs. For example, additional funds are needed to replace substandard housing and preserve and revitalize historic housing. Also, banks could help restore communities by donating bank-owned real estate to reputable non-profit groups that rehab blighted properties, train residents for construction jobs, and provide housing to LMI families. The contact also stressed the importance of financial education, particularly for LMI first-time homebuyers. The contact suggested that banks sponsor non-profits with established financial literacy programs or create a consortium to pool resources to achieve positive outcomes, rather than implementing their own programs.

Population Characteristics

Population Change Assessment Area: Dayton-Kettering, OH MSA #19430			
Area	2015 Population	2020 Population	Percent Change
Assessment Area	637,280	639,126	0.3
Miami County	103,517	107,516	3.9
Montgomery County	533,763	531,610	-0.4
Dayton-Kettering, OH MSA	801,472	809,248	1.0
Ohio	11,575,977	11,693,217	1.0

Source: 2011-2015 U.S. Census Bureau: American Community Survey
U.S. Census Bureau Vintage 2020 Population Estimates for the United States and States

- From 2015 through 2019, Miami County experienced an increase in population at 3.9%, while Montgomery County experienced a slight loss in population at 0.4%, compared to Ohio with a growth rate of 1.0%.
- Over the next 20 years population in the AA is projected to decrease by at least 7.2%.
- 77.3% of AA population was 18 years of age or older, the legal age to enter into a contract.
- 16.3% of the population in the AA was age 65 and over, compared to 15.1% in Ohio, which means the AA has smaller working- and consumer-age populations and decreased economic activity.
- 11.02% of the population resides in the AA’s low-income tracts. 20.91% of the population resides in the AA’s moderate-income tracts. 32% of the AA population reside in LMI tracts
- The largest municipalities in the AA are the cities of Dayton and Kettering (Montgomery County), with a population of 140,407 and 54,394 respectively; and Troy and Piqua (Miami County) with a population of 26,281 and 21,332 respectively.⁹

Income Characteristics

Borrower Income Levels Assessment Area: Dayton-Kettering, OH MSA #19430														
FFIEC Estimated Median Family Income			Low		Moderate			Middle		Upper				
Year	\$	% Change	0	-	49.9%	50%	-	79.9%	80%	-	119.9%	120%	-	& above
2016	\$59,500		0	-	\$29,749	\$29,750	-	\$47,599	\$47,600	-	\$71,399	\$71,400	-	& above
2017	\$63,600	6.9%	0	-	\$31,799	\$31,800	-	\$50,879	\$50,880	-	\$76,319	\$76,320	-	& above
2018	\$65,700	3.3%	0	-	\$32,849	\$32,850	-	\$52,559	\$52,560	-	\$78,839	\$78,840	-	& above
2019	\$70,600	7.5%	0	-	\$35,299	\$35,300	-	\$56,479	\$56,480	-	\$84,719	\$84,720	-	& above
2020	\$72,800	3.1%	0	-	\$36,399	\$36,400	-	\$58,239	\$58,240	-	\$87,359	\$87,360	-	& above

Source: 2016-2020 FFIEC Census Data

- During the evaluation period, the median family income (MFI) in the AA increased each year, except in 2019; but experienced an overall increase of 22.4% during this span.
- According to 2018 U.S. Census data estimates, Miami and Montgomery counties ranked 25th and 55th in Ohio with MFIs at \$55,544 and \$49,314 respectively.

⁹ www.development.oh.gov/reports_countytrends_map

Poverty Rates			
Assessment Area: Dayton-Kettering, OH MSA #19430			
Area	2017	2018	2019
Miami County	9.0	7.9	8.8
Montgomery County	15.9	16.9	15.3
Ohio	13.9	13.8	13.0
United States	13.4	13.1	12.3

Source: U.S. Census Bureau Small Area Income and Poverty Estimates Program

- While poverty rates in Montgomery County were consistently higher than poverty rates in Ohio and the nation from 2017 through 2019, poverty rates in Miami County were consistently lower.
- Of the 161,698 families in the AA, 42.1% are designated as LMI, with 13.7% living below poverty level; compared to 38.9% of families in Ohio designated as LMI, with 11.5% living below poverty level.
- Of the 263,822 households in the AA, 16.30% are below poverty and 3.4% receive public assistance.

Housing Characteristics

Housing Cost Change										
Assessment Area: Dayton-Kettering, OH MSA #19430										
Area	Median Housing Value					Median Gross Rent				
	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019
Miami County	\$137,700	\$136,800	-0.7	\$151,400	10.7	\$675	\$730	8.1	\$767	5.1
Montgomery County	\$119,100	\$109,900	-7.7	\$119,800	9.0	\$684	\$728	6.4	\$793	8.9
Dayton-Kettering, OH MSA	\$128,400	\$122,600	-4.5	\$135,000	10.1	\$696	\$745	7.0	\$807	8.3
Ohio	\$136,400	\$129,900	-4.8	\$145,700	12.2	\$678	\$730	7.7	\$808	10.7

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey
2015-2019 U.S. Census Bureau: American Community Survey

- While median housing values increased significantly from 2010-2019, housing become more affordable across the AA, primarily due to the increasing MFI. The affordability ratio¹⁰ went from 37.0 in 2010 to 39.5 in 2015 to 41.7 in 2019.
- Median gross rents across the AA increased by 14.0% on average from 2010-2019. The rise in median gross rents indicates the need for more affordable housing, considering the larger percentage of low- and moderate-income families dependent upon the rental market.

¹⁰ The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

- There are 298,681 housing units in the AA of which 55.1% are owner occupied, 33.2% are rental, and 11.7% are vacant; compared to 39,755 (13.3%) of housing units in low-income tracts of which 29.0% are owner-occupied, 44.2% are rental, and 26.9% are vacant; and to 65,397 (21.9%) of housing units in moderate-income tracts of which 43.7% are owner-occupied, 40.7% are rental, and 15.7% are vacant.
- With 44.9% of housing units being either rental or vacant, there appears to be limited opportunities to originate home mortgage loans in the AA, particularly in LMI income areas.
- The median age of housing stock in the AA is 57 years old, and 25.5% of housing units were built prior to 1950 (over 70 years old). The age of the housing stock across the AA may indicate a need for home improvement lending and for refinance or home improvement loans to remove lead-based paint which was commonly used on houses and apartments built before 1978.¹¹

Housing Cost Burden						
Assessment Area: Dayton-Kettering, OH MSA #19430						
Area	Cost Burden – Owners			Cost Burden – Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Assessment Area	67%	40%	22%	76%	36%	45%
Miami County	66%	33%	18%	77%	24%	39%
Montgomery County	67%	41%	22%	76%	38%	46%
Dayton-Kettering, OH MSA	68%	40%	21%	76%	38%	45%
Ohio	64%	35%	20%	74%	32%	43%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey

- Nearly 67.0% of low-income homeowners and 76.0% of low-income renters are cost burdened, compared to 40.0% of moderate-income homeowners and 24.0% of moderate-income renters.
- 22.0% of homeowners across the AA are cost burdened, which is more than homeowners across Ohio at 20.0%.
- 45.0% of renters across the AA are cost burdened, which is more than renters across Ohio at 43.0%.
- The data shows that cost burden disproportionately affects renter-occupied households, particularly low-income renter-occupied households.
- Based on the increasing home values and rental rates; LMI individuals, particularly those who are cost burdened, may have a difficult time saving enough to make a sufficient down payment or affording increasing rents.

¹¹ Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning

Building Permits by Number of Units					
Assessment Area: Dayton-Kettering, OH MSA #19430					
Area	2018	2019	% Change between 2018 and 2019	2020	% Change between 2019 and 2020
Miami County	227	202	-11.0	277	37.1
Montgomery County	761	440	-42.2	913	107.5
Dayton-Kettering, OH MSA	1,577	1,231	-21.9	1,699	38.0
Ohio	24,221	23,047	-4.8	29,686	28.8
United States	1,328,827	1,386,048	4.3	1,471,141	6.1

Source: U.S. Census Bureau Building Permits Survey

- Building permits are a leading indicator of future activity in the construction sector. From 2018-2019 the percentage of building permits increased across the AA, particularly in Montgomery County from 2019-2020.
- The increase of building permits could indicate an increasing demand for home purchase loans, particularly in Montgomery County.

Labor, Employment and Economic Characteristics

Unemployment Rates					
Assessment Area: Dayton-Kettering, OH MSA #19430					
Area	2016	2017	2018	2019	2020
Assessment Area	4.9%	4.8%	4.4%	4.1%	8.3%
Miami County	4.4%	4.2%	3.9%	3.7%	7.0%
Montgomery County	5.0%	4.9%	4.5%	4.2%	8.6%
Dayton-Kettering, OH MSA	4.8%	4.7%	4.3%	4.1%	7.9%
Ohio	5.0%	5.0%	4.5%	4.2%	8.1%

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- While 2016-2019 unemployment rates decreased across the AA, 2020 unemployment rates increased by 4.2 percentage points in response to the COVID-19 pandemic.
- Unemployment rates across the AA were generally below Ohio's rates between 2016-2019 and higher in 2020.
- According to Ohio Office of Research:¹²
 - Land use in Miami County is primarily rural with less than 13.0% available for urban (i.e., residential, commercial, industrial, or recreational) development, compared to Montgomery County which is primarily urban with 44.5% of land available for development.
 - Miami County is most impacted by the industries of manufacturing; trade, transportation, and utilities; education and health services; local government; leisure

¹² www.development.oh.gov/reports_countytrends_map

- and hospitality, and professional and business services. Major employers include but are not limited to ConAgra Inc., Clopay Building Products, Crane Co, F-Tech Inc/F&P America, Goodrich Corp, Hartzell Propeller, ITW Food Equipment/Hobart, Meijer Inc., Piqua City Schools, Regal Beloit Corp, Troy City Schools, and Upper Valley Medical Center. The average weekly wage for private sector is \$820, which indicates that employed persons could afford the median rent of \$767.
- Montgomery County is most impacted by the industries of manufacturing, trade, transportation, and utilities; local government, education, and health services; leisure and hospitality, and professional and business services. Major employers include but are not limited to AES Corp/Dayton Power & Light, Behr Dayton Thermal Products LLC, CareSource, DMax Ltd, Fuyao Glass America, Green Tokai Co, Kettering Health Network, PNC Financial Services Group, Premier Health Partners Inc, Reed Elsevier/LexisNexis, Reynolds & Reynolds Co Inc, Synchrony Financial, University of Dayton, and the US Federal Government. The average wage for the private sector is \$902 which indicates that employed persons could afford the median rent of \$793.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DAYTON-KETTERING OH MSA #19430

LENDING TEST

The lending test performance in the Dayton MSA is reasonable. Details of Minster's lending can be found in the tables in Appendix C.

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

Minster's lending penetration among borrowers of different income (including LMI) levels and to businesses of different sizes in the Dayton MSA is considered reasonable.

The borrower distribution performance to businesses of different sizes in 2020 will not receive much weight, since gross annual revenue information was not available for a large percentage of Minster's small business loans. Most of these loans were PPP loans, and banks were not required to collect revenue data for PPP loans.

During the evaluation period, Minster originated seven loans (\$796,710) under the Freddie Mac Home Possible loan program and 10 grants (\$50,000) under the FHLB of Cincinnati's WHP to 14 qualified LMI borrowers in the Dayton AA. The Home Possible loan program is designed to help LMI borrowers qualify for a mortgage loan with flexible credit options and affordable monthly payments, and the Welcome Home grants of \$5,000 provide down payment assistance and/or low closing costs for LMI homebuyers. The community contact stressed the critical need for all aspects of affordable housing.

HMDA Lending

During the evaluation period Minster made 454 HMDA loans totaling \$87.6 million, including 261 home purchase and 160 refinance loans totaling \$47.9 million and \$27.9 million, respectively. Minster's performance was compared to the percentage of families (proxy) and the aggregate of all lenders. Minster's borrower distribution of HMDA loans is reasonable.

Home Purchase Lending

Minster made 52 home purchase loans totaling \$10.7 million in 2020. Minster also made nine (17.3%) home purchase loans to borrowers with unknown-income designations. Minster originated one (1.9%) home purchase loans to low-income borrowers, which was significantly below the percentage of families at 24.3% and the aggregate of all lenders at 11.0%. Minster originated 14 (26.9%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 17.8% and the aggregate of all lenders at 24.6%.

Minster made 47 home purchase loans totaling \$8.5 million in 2019. Minster also made six (12.8%) home purchase loans to borrowers with unknown-income designations. Minster originated two (4.3%) home purchase loans to low-income borrowers, which was significantly below the percentage of families at 24.3% and the aggregate of all lenders at 9.7%. Minster originated seven (14.9%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 17.8% and the aggregate of all lenders at 23.7%.

Minster made 45 home purchase loans totaling \$8.4 million in 2018. Minster also made three (6.7%) home purchase loans to borrowers with unknown-income designations. Minster originated two (4.4%) home purchase loans to low-income borrowers, which was significantly below the percentage of families at 24.3% and below the aggregate of all lenders at 8.6%. Minster originated nine (20.0%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 17.8% and was below the aggregate of all lenders at 22.6%.

Minster made 44 home purchase loans totaling \$8.7 million in 2017. Minster also made one (2.3%) home purchase loans to borrowers with unknown-income designations. Minster originated one (2.3%) home purchase loan to low-income borrowers, which was significantly below the percentage of families at 24.3%% and the aggregate of all lenders at 8.1%. Minster originated nine (20.5%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 17.8% and was comparable to the aggregate of all lenders at 20.7%.

Minster made 73 home purchase loans totaling \$11.5 million in 2016. Minster also made 12 (16.4%) home purchase loans to borrowers with unknown-income designations. Minster originated six (8.2%) home purchase loans to low-income borrowers, which was below the percentage of families at 22.5%% but exceeded the aggregate of all lenders at 6.1%. Minster originated 10 (13.7%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 18.6% and the aggregate of all lenders at 17.3%.

Performance mostly fell below the comparators for low-income borrowers and was comparable or exceeded the comparators for moderate-income borrowers. Considering nearly 67.0% of low-income homeowners and 76.0% of low-income renters are cost burdened, LMI individuals, particularly low-income individuals, may have a difficult time saving enough for a down payment to purchase a home. Therefore, borrower distribution for home purchase lending is poor to low-income borrowers and reasonable to moderate-income borrowers.

Refinance Lending

Minster made 69 refinance loans totaling \$13.6 million in 2020. Minster also made six (8.7%) refinance loans to borrowers with unknown-income designations. Minster originated no refinance loans to low-income borrowers, compared to the percentage of families at 24.3% and the aggregate of all lenders at 5.3%. Minster originated 10 (14.5%) refinance loans to moderate-income borrowers, which was below the percentage of families at 17.8% and exceeded the

aggregate of all lenders at 14.0%.

Minster made 33 refinance loans totaling \$5.4 million in 2019. Minster also made 22 (66.7%) refinance loans to borrowers with unknown-income designations. Minster originated one (3.0%) refinance loan to low-income borrowers, which was significantly below the percentage of families at 24.3% and below the aggregate of all lenders at 8.1%. Minster originated three (9.1%) refinance loans to moderate-income borrowers, which was below the percentage of families at 17.8% and the aggregate of all lenders at 16.3%.

Minster made 36 refinance loans totaling \$5.5 million in 2016. Minster also made 11 (30.6%) refinance loans to borrowers with unknown-income designations. Minster originated no refinance loans to low-income borrowers, compared to the percentage of families at 22.5% and the aggregate of all lenders at 5.4%. Minster originated three (8.3%) refinance loans to moderate-income borrowers, which was below the percentage of families at 18.6% and the aggregate of all lenders at 10.7%.

Performance mostly fell significantly below the comparators for low-income borrowers and was comparable to the comparators for moderate-income borrowers, particularly in 2020 the year with the most lending activity. Therefore, borrower distribution for refinance lending is poor to low-income borrowers and reasonable to moderate-income borrowers.

Small Business Lending

In 2020 Minster made 155 small business loans totaling \$28.1 million to businesses of different sizes, of which 60.6% were PPP loans. As a result, there were 94 (60.6%) loans totaling \$14.3 million made to businesses with unknown gross annual revenues and 50 (32.3%) loans totaling \$8.1 million made to businesses with revenues of less than \$1.0 million, compared to percentage of small businesses at 90.2%.

Minster made 63.9% of its small dollar loans in amounts of \$100,000 or less. This indicates the bank's willingness to lend in smaller amounts that tend to represent amounts typically requested by small businesses, particularly small businesses impacted by the COVID-19 emergency.

While this analysis was skewed by the large percentage of businesses with unknown gross annual revenues, Minster's willingness to lend in smaller amounts exhibits responsiveness to credit needs of small businesses in the AA. The need for access to capital, especially for small businesses, is critical for new businesses to start and existing businesses to expand. If PPP loans were excluded from the analysis, 80.3% of the bank's loans were made to businesses with revenues of less than \$1.0 million. Therefore, Minster's distribution to businesses of different sizes is reasonable.

Home Equity Lending

Minster made 28 home equity loans totaling \$2.8 million in 2020. Minster also made one (3.6%) home equity loan to borrowers with unknown-income designations. Minster originated no home equity loans to low-income borrowers, compared to the percentage of families at 24.3%. Minster originated six (21.4%) home equity loans to moderate-income borrowers, which exceeded the percentage of families at 17.8%. Therefore, the borrower distribution of home equity loans is very poor to low-income borrowers and excellent to moderate-income borrowers.

Geographic Distribution of Loans

Minster’s geographic distribution reflects a reasonable dispersion of loans in the Dayton MSA. Minster has a substantial level of lending gaps.

Percentage of Lending Penetration					
Tract Income Level	2016	2017	2018	2019	2020
Low	0.0%	16.7%	0.0%	8.3%	8.3%
Moderate	15.9%	7.7%	10.3%	5.1%	5.1%
Middle	22.1%	18.4%	18.4%	19.7%	19.7%
Upper	21.9%	14.7%	14.7%	20.6%	20.6%
Unknown	0.0%	0.0%	0.0%	0.0%	0.0%
Total	17.8%	14.9%	13.2%	14.9%	14.9%

The penetration rate was less than 20.0% in all tract income levels for the entire evaluation period. However, from January 2016 through July 2020, Minster served the AA from its Troy branch in Miami County and was able to make one or more loans in 35 LMI tracts. Miami County only has three moderate-income tracts, which are in Piqua. The branch in Troy is about eight miles south of Piqua and 25 miles north of Dayton. The majority of LMI tracts are in Dayton, and Minster opened its Dayton branch in Montgomery County in July 2020. Minster only has 0.6% of deposit market share, while the three largest market holders have approximately 65.0% of the market. Minster competes with 23 financial institutions for the remaining 35.0% market share in the AA.

HMDA Lending

During the evaluation period Minster made 454 HMDA loans totaling \$87.6 million, including 261 home purchase and 160 refinance loans totaling \$47.9 million and \$27.9 million, respectively. Minster’s performance was compared to the percentage of owner-occupied units by tract income (proxy) and the aggregate of all lenders. Minster’s geographic distribution of HMDA loans is reasonable.

Home Purchase Lending

Minster made 52 home purchase loans totaling \$10.7 million in 2020. Minster originated four (7.7%) home purchase loan in low-income tracts, which exceeded the percentage of owner-occupied units at 7.0% and significantly exceeded the aggregate of all lenders at 3.4%. Minster originated three (5.8%) home purchase loan in moderate-income tracts, which was significantly below the percentage of owner-occupied units at 17.4% and the aggregate of all lenders at 14.7%.

Minster made 47 home purchase loans totaling \$8.5 million in 2019. Minster originated two (4.3%) home purchase loan in low-income tracts, which was below the percentage of owner-occupied units at 7.0% and exceeded the aggregate of all lenders at 3.3%. Minster originated three (6.4%) home purchase loan in moderate-income tracts, which was significantly below the percentage of owner-occupied units at 17.4% and the aggregate of all lenders at 13.6%.

Minster made 45 home purchase loans totaling \$8.4 million in 2018. Minster made no home purchase loans in low-income tracts, compared to the percentage of owner-occupied units at 7.0% and the aggregate of all lenders at 3.2%. Minster originated four (8.9%) home purchase loan in moderate-income tracts, which was below the percentage of owner-occupied units at 17.4% and the aggregate of all lenders at 14.5%.

Minster made 44 home purchase loans totaling \$8.7 million in 2017. Minster made no home purchase loans in low-income tracts, compared to the percentage of owner-occupied units at 7.0% and the aggregate of all lenders at 2.5%. Minster originated three (6.8%) home purchase loans in moderate-income tracts, which was significantly below the percentage of owner-occupied units at 17.4% and the aggregate of all lenders at 14.3%.

Minster made 73 home purchase loans totaling \$11.5 million in 2016. Minster made no home purchase loans in low-income tracts, compared to the percentage of owner-occupied units at 5.5% and the aggregate of all lenders at 2.3%. Minster originated 11 (15.1%) home purchase loan in moderate-income tracts, which was below the percentage of owner-occupied units at 19.6% and exceeded the aggregate of all lenders at 13.4%.

Minster's home purchase lending performance varied in LMI tracts compared to the percentage of owner-occupied units and the aggregate of all lenders; therefore, the geographic distribution of home purchase lending is reasonable in low-income tracts and poor in moderate-income tracts.

Refinance Lending

Minster made 69 refinance loans totaling \$13.6 million in 2020. Minster originated one (1.4%) refinance loan in low-income tracts, which below the percentage of owner-occupied units at 7.0% and the aggregate of all lenders at 1.1%. Minster originated four (5.8%) refinance loans in moderate-income tracts, which was below the percentage of owner-occupied units at 17.4% and

the aggregate of all lenders at 8.3%.

Minster made 33 refinance loans totaling \$5.4 million in 2019. Minster made no refinance loans in low-income tracts, compared to the percentage of owner-occupied units at 7.0% and the aggregate of all lenders at 1.6%. Minster originated three (9.1%) refinance loan in moderate-income tracts, which was below the percentage of owner-occupied units at 17.4% and exceeded the aggregate of all lenders at 8.9%.

Minster made 36 refinance loans totaling \$5.5 million in 2016. Minster made no refinance loans in low-income tracts, compared to the percentage of owner-occupied units at 5.5% and the aggregate of all lenders at 2.2%. Minster originated five (13.9%) refinance loans in moderate-income tracts, which was below the percentage of owner-occupied units at 19.6% and exceeded the aggregate of all lenders at 12.3%.

Performance mostly fell below the comparators in low-income tracts and was comparable to the comparators in moderate-income tracts; therefore, Minster's geographic distribution of refinance lending is poor in low-income tracts and reasonable in moderate-income tracts.

Small Business Lending

In 2020 Minster made 155 small business loans totaling \$28.1 million. Minster originated no small business loans in low-income tracts, compared to the percentage of businesses in those tracts at 8.6%. Minster originated three (1.9%) small business loans in moderate-income tracts, which was significantly below the percentage of businesses in those tracts at 18.8%. However, since Minster opted to include its PPP loans in amounts of \$1.0 million or less that are also in LMI tracts for consideration under the community development test, the geographic distribution largely skewed towards the middle- and upper-income tracts. However, if PPP loans were excluded from the analysis, the percentage of small business loans in moderate-income tracts is 4.9%, which is still significantly below proxy. Therefore, the geographic distribution of small business loans is poor in LMI tracts.

Home Equity Lending

Minster made 28 home equity loans totaling \$2.8 million in 2020. Minster originated no home equity loans in LMI tracts, compared to the percentage of owner-occupied units at 7.0% in low- and 17.4% in moderate-income tracts. However, home equity loans in middle- and upper-income tracts exceeded the percentage of owner-occupied units. While the geographic distribution of home equity loans is very poor in LMI tracts, considering the overall low volume of loans and the significantly lower median housing values and limited number of owner-occupied units in LMI tracts, home equity lending in this AA will not be given much weight.

COMMUNITY DEVELOPMENT TEST

Minster's community development performance demonstrates excellent responsiveness to community development needs in the Dayton AA through community development loans, qualified investments, and community development services.

Primarily, Minster made community loans to small businesses in LMI geographies through the PPP loan program and non-profits enabling them to increase their capacity to serve LMI individuals and families. These loans are considered responsive to credit needs of small businesses and LMI people disproportionality impacted by the COVID-19 emergency. Other community development activities supported organizations and non-profits that provide services to LMI individuals and families and promote economic development and affordable housing initiatives. Minster also provided financial literacy education, including to LMI students grades K-12. The community contact indicated the critical need for all aspects of affordable housing and opportunities for financial institutions to support financial literacy training.

Community Development Lending

Minster originated 34 community development loans totaling \$4.4 million in the Dayton AA, which represents 62.7% of Minster's total community development lending by dollar amount during this evaluation period. Thirty community development loans, totaling \$2.8 million, were PPP loans made in response to the COVID-19 crisis to help local small businesses in LMI communities remain open and retain their workforce. The remaining four community development loans, totaling approximately \$1.6 million, were:

- A construction loan and line of credit, totaling \$1.2 million, to a non-profit to fund the renovation of a facility to accommodate a new family advocacy center and expand its services and offerings for newborns and families impacted by addiction, the majority of whom are LMI.
- A construction loan and line of credit, totaling \$467,680, to a non-profit to fund the renovation of a building to house new administrative offices and expand its emergency shelter which provides wraparound services to abused and homeless adult men and women and their dependent children, the majority of whom are LMI.

Funding the expansion of these non-profits' facilities enabled them to provide more LMI individuals and families access to wraparound services, which was particularly important for LMI people disproportionality impacted by the pandemic.

Qualified Investments

Minster made 37 donations totaling \$75,038 to 19 organizations, which represents 89.6% of Minster's total qualified donations by dollar amount during the evaluation period.

The contributions supported organizations that provide community services targeted to LMI individuals and families (including health services; food assistance; emergency and permanent shelter for LMI victims of abuse, homelessness, and addiction; mentoring; and wraparound services targeted toward LMI seniors, children, and infants) and promote economic development.

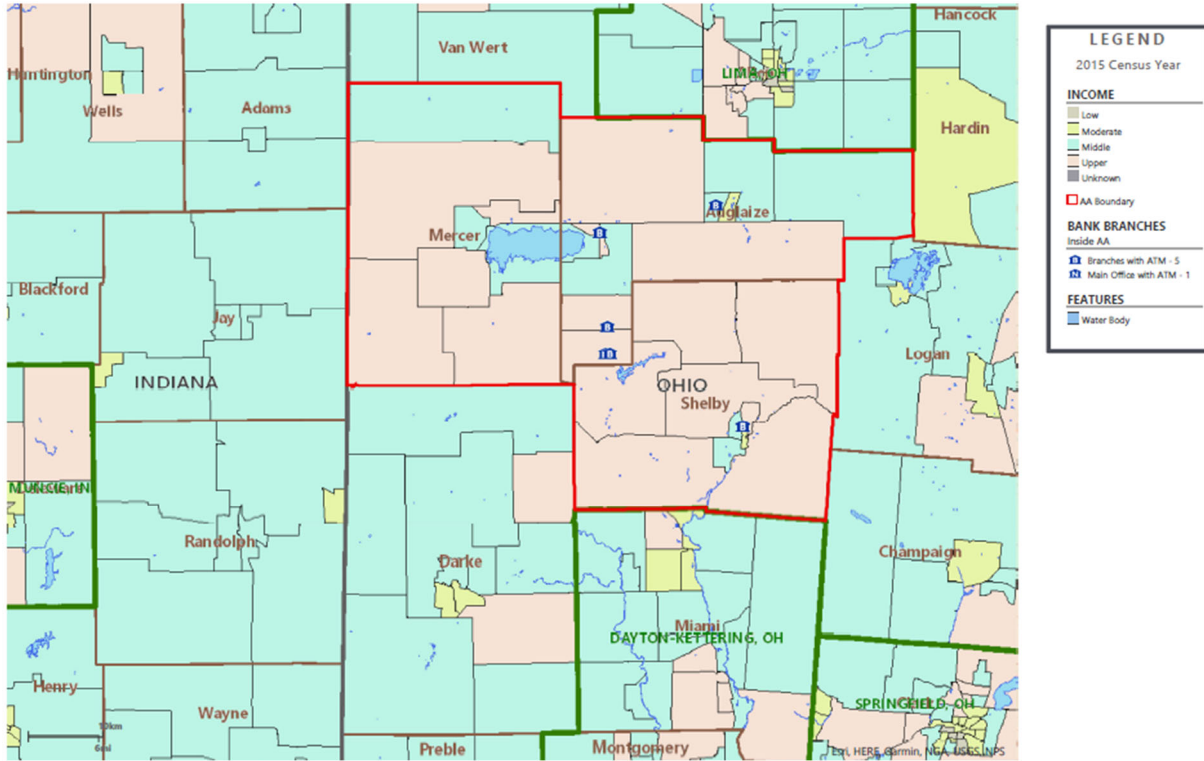
Community Development Services

Community Development Services				
CD Purpose	# Organizations	# Services	# Employees	# Hours
Services to LMI	5	5	2	235
Economic Development	1	1	1	60
Affordable Housing	1	1	1	48
Totals	7	7	4	343*
*CD service hours equate to 0.2 ANP Annualized Persons (ANP): Number qualified CD service hours divided by 2,000 work hours in a year				

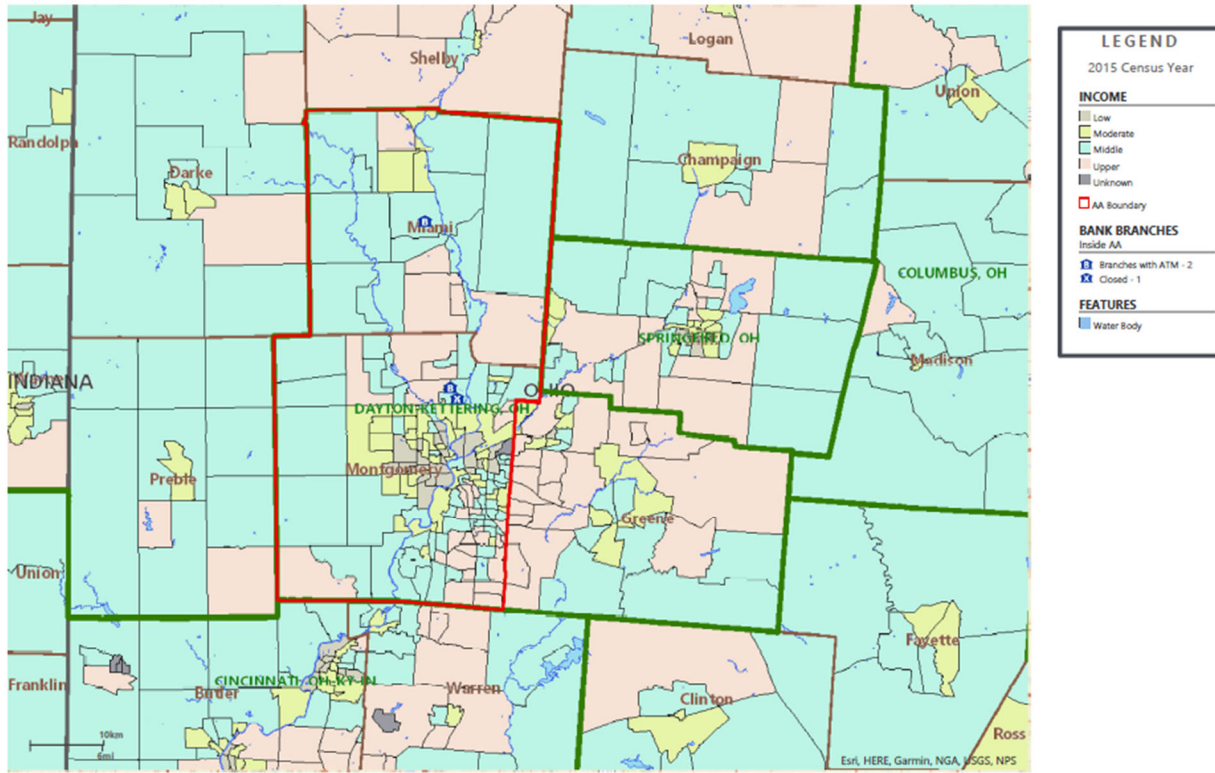
During the evaluation period, four employees provided seven services totaling at least 343 hours of community development services to seven different organizations that provide various services throughout the AA. Employees provided leadership, financial, and/or technical expertise to multiple community organizations that offer services to LMI individuals and families and promote economic development or affordable housing. For example, one employee served on a finance committee to help determine best use of funds to provide recovery and mental health services to LMI patients, one employee served on an allocation committee that helps determine best use of funds, and the other employee provided technical expertise to help with fundraising and raising awareness for local nonprofits across the AA. Community development services include 168 hours serving on boards and/or committees and 175 hours providing technical expertise. Also, two employees provided 11 hours of financial literacy training to 1,425 students in five schools, of which two schools had majority student bodies (853 students) eligible for the free-and reduced-lunch program. The community contact indicated there are opportunities for financial institutions to support financial literacy training.

Appendix A – Maps of the Assessment Areas

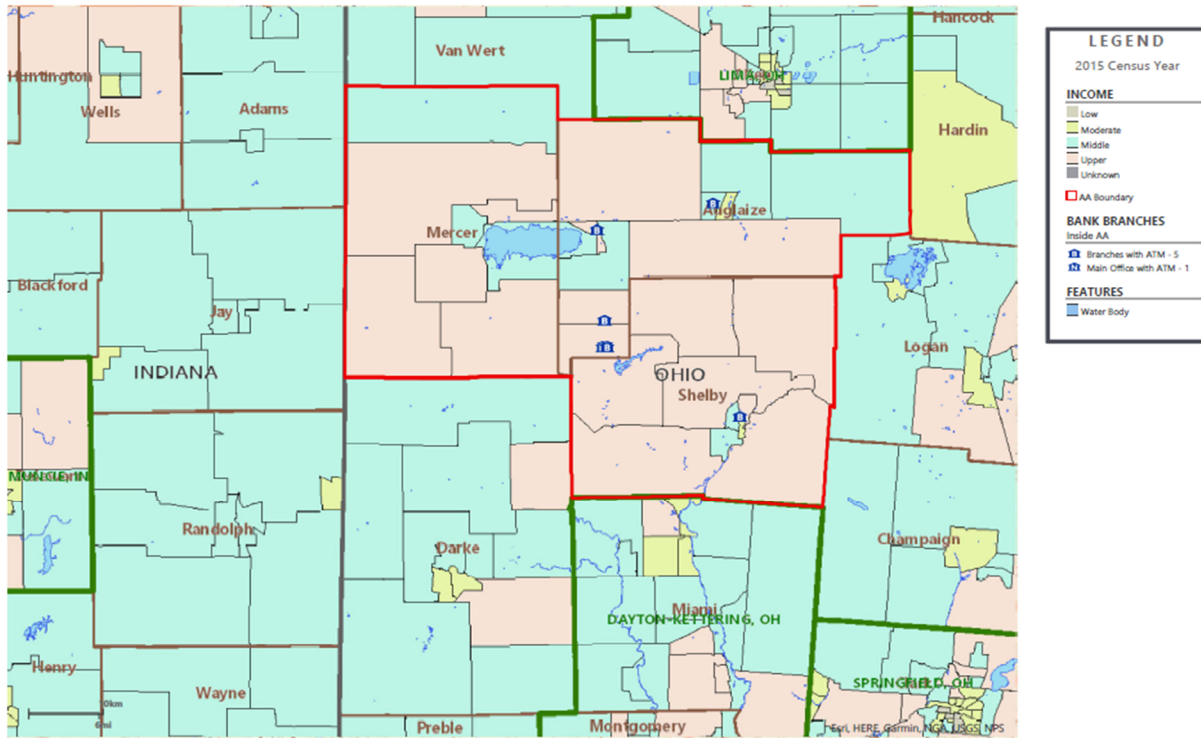
2020 Nonmetropolitan Ohio



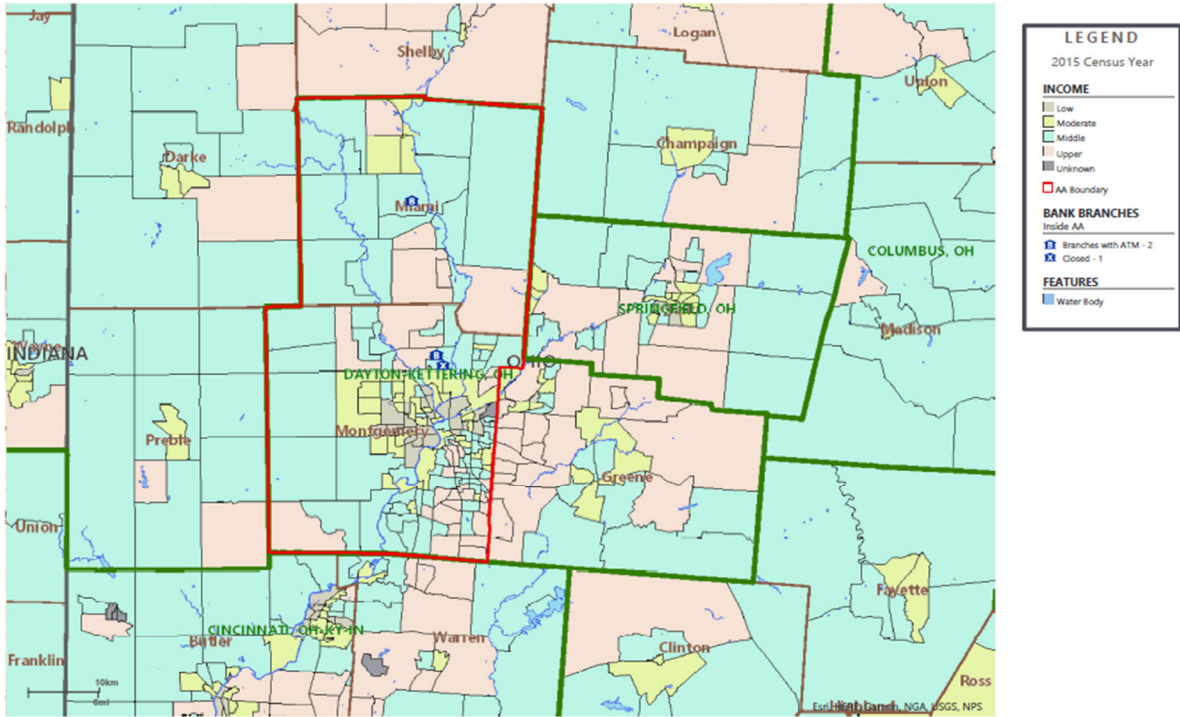
2020 Dayton-Kettering, OH MSA #19430



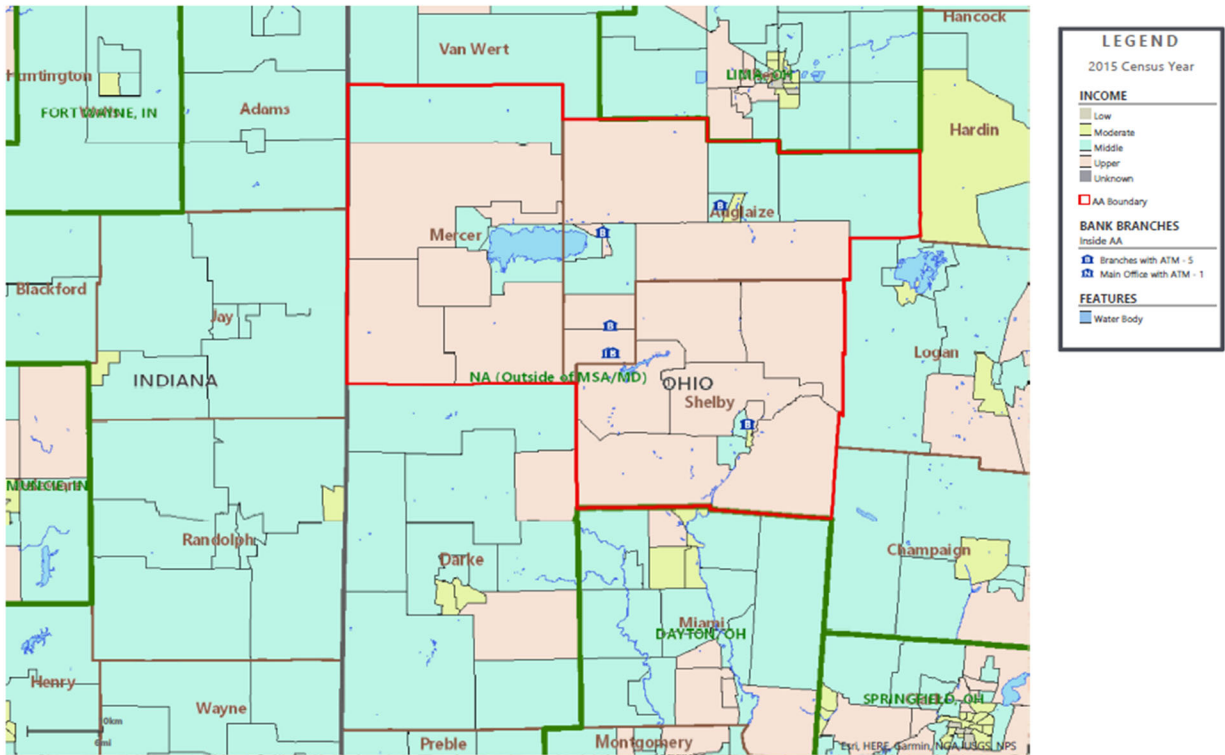
2019 Nonmetropolitan Ohio



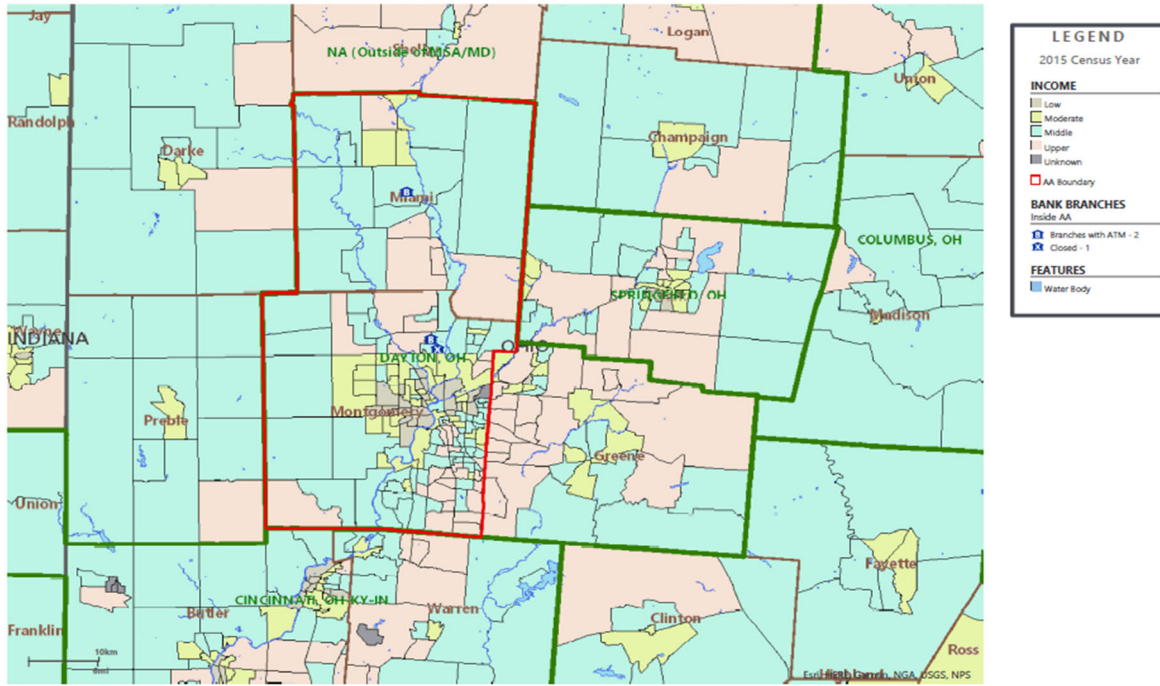
2019 Dayton-Kettering, OH MSA #19430



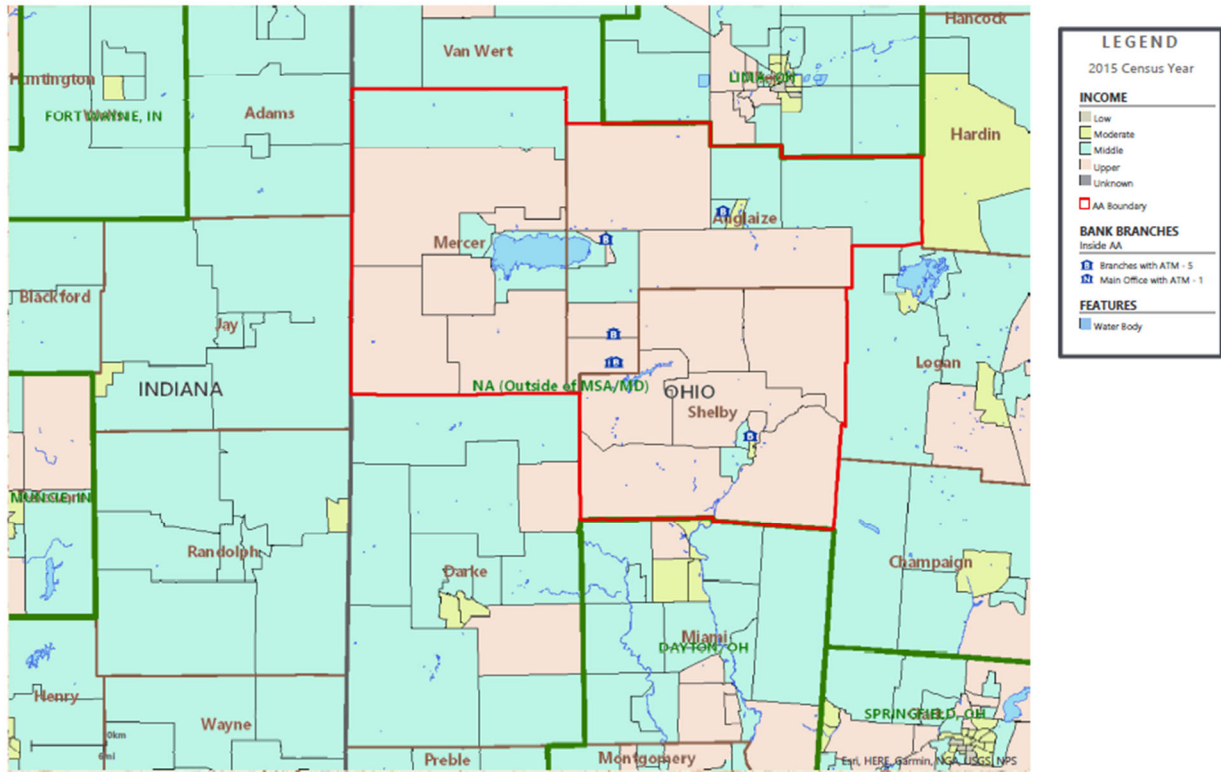
2018 Nonmetropolitan Ohio



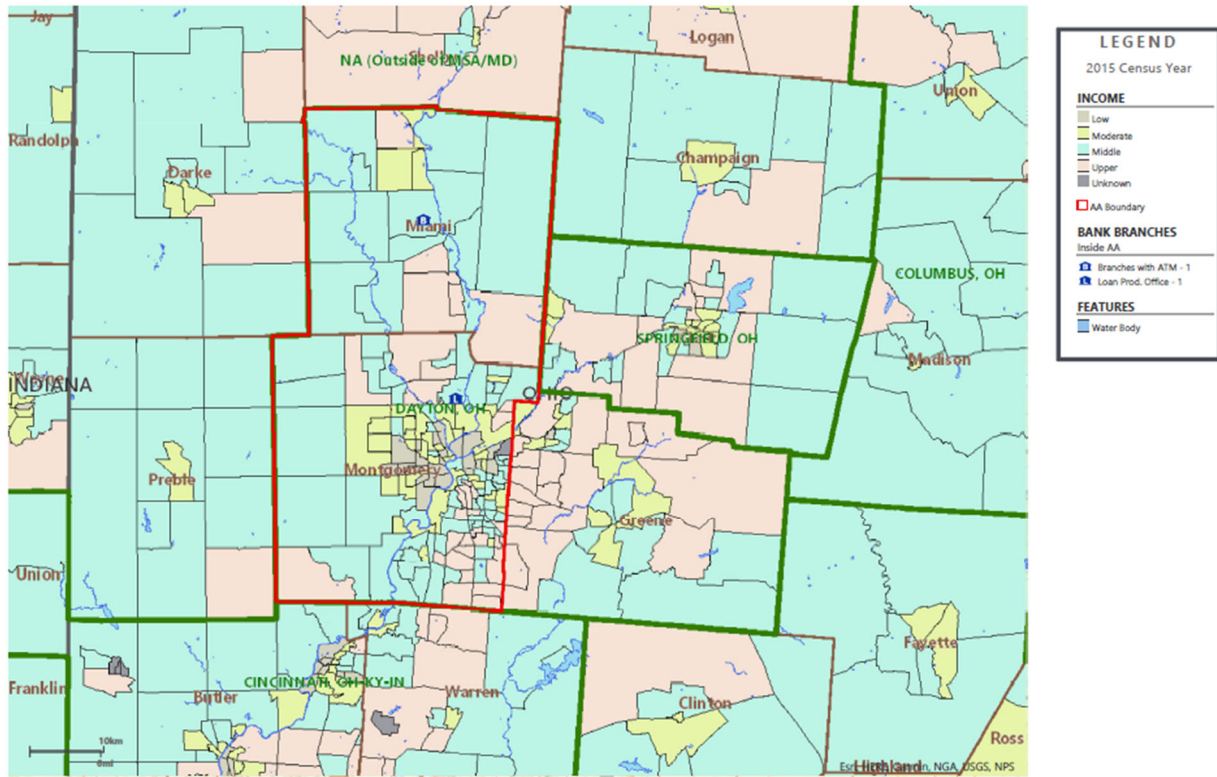
2018 Dayton-Kettering, OH MSA #19430



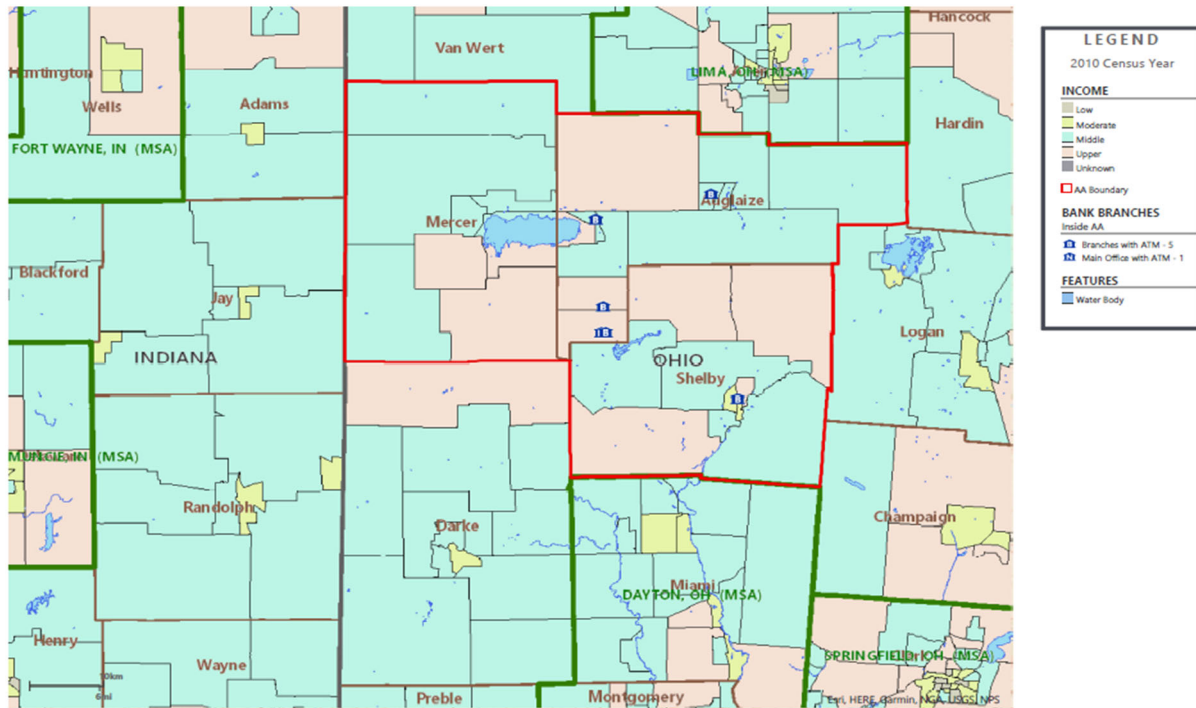
2017 Nonmetropolitan Ohio



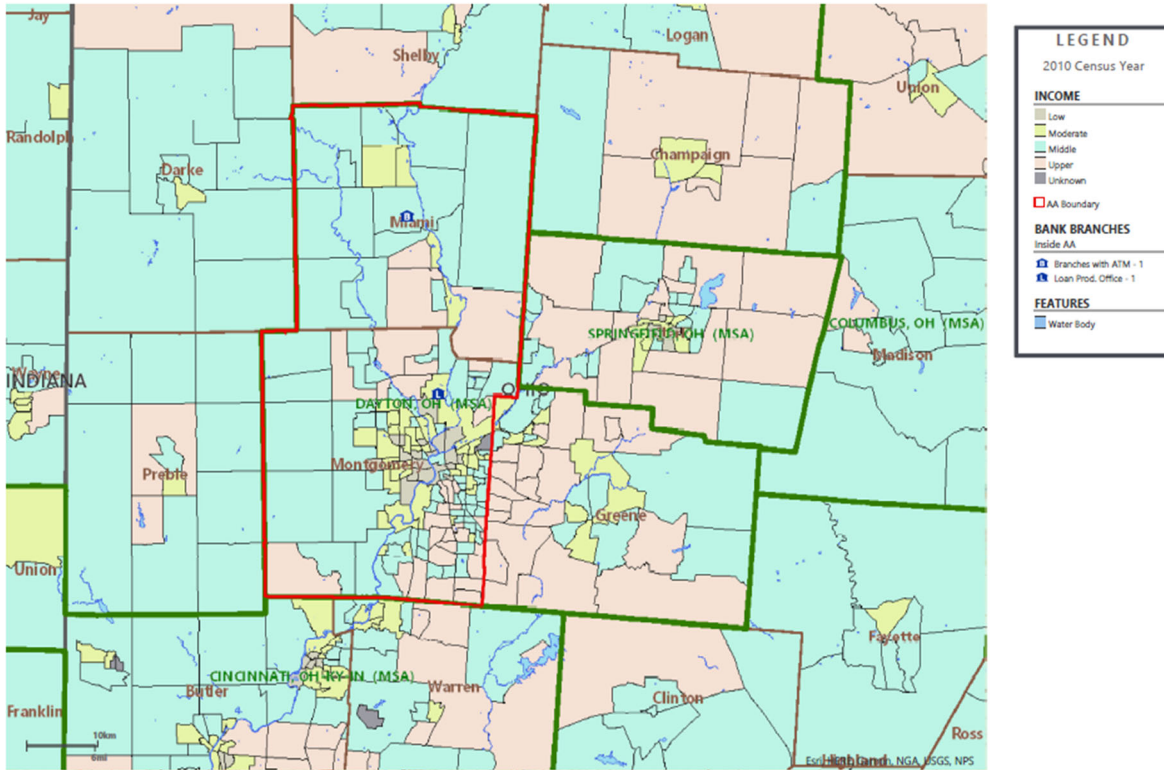
2017 Dayton-Kettering, OH MSA #19430



2016 Nonmetropolitan Ohio



2016 Dayton-Kettering, OH MSA #19430



Appendix B – Demographic Information

Assessment Area(s): 2020 Nonmetropolitan Ohio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,796	13.0
Moderate-income	2	6.7	1,812	4.9	458	25.3	6,039	16.3
Middle-income	11	36.7	11,919	32.3	1,020	8.6	7,586	20.5
Upper-income	17	56.7	23,213	62.8	848	3.7	18,523	50.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	30	100.0	36,944	100.0	2,326	6.3	36,944	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	3,503	1,314	3.4	37.5	1,564	44.6	625	17.8
Middle-income	20,447	12,351	31.8	60.4	5,659	27.7	2,437	11.9
Upper-income	33,537	25,156	64.8	75.0	6,605	19.7	1,776	5.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	57,487	38,821	100.0	67.6	13,828	24.1	4,838	8.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	401	345	7.7	7.6	53	9.2	3	3.7
Middle-income	1,629	1,428	31.4	31.5	172	29.9	29	35.8
Upper-income	3,161	2,762	60.9	60.9	350	60.9	49	60.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	5,191	4,535	100.0	100.0	575	100.0	81	100.0
Percentage of Total Businesses:				87.4		11.1		1.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	3	2	0.4	0.3	1	9.1	0	0.0
Middle-income	108	106	14.1	14.2	1	9.1	1	20.0
Upper-income	654	641	85.5	85.6	9	81.8	4	80.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	765	749	100.0	100.0	11	100.0	5	100.0
Percentage of Total Farms:				97.9		1.4		.7

2020 FFIEC Census Data and 2020 D&B Information

Assessment Area(s): 2020 Dayton-Kettering, OH MSA #19430

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	24	13.8	15,725	9.7	6,297	40.0	39,304	24.3
Moderate-income	39	22.4	31,779	19.7	7,134	22.4	28,814	17.8
Middle-income	76	43.7	77,847	48.1	7,426	9.5	32,379	20.0
Upper-income	34	19.5	36,347	22.5	1,291	3.6	61,201	37.8
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	174	100.0	161,698	100.0	22,148	13.7	161,698	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	39,755	11,514	7.0	29.0	17,567	44.2	10,674	26.8
Moderate-income	65,397	28,571	17.4	43.7	26,592	40.7	10,234	15.6
Middle-income	137,930	83,485	50.7	60.5	43,943	31.9	10,502	7.6
Upper-income	55,599	41,025	24.9	73.8	11,125	20.0	3,449	6.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	298,681	164,595	100.0	55.1	99,227	33.2	34,859	11.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	2,254	8.6	1,986	8.4	262	10.9	6	3.9
Moderate-income	4,896	18.8	4,297	18.3	577	23.9	22	14.3
Middle-income	12,787	49.0	11,541	49.0	1,147	47.5	99	64.3
Upper-income	6,167	23.6	5,713	24.3	427	17.7	27	17.5
Unknown-income	2	0.0	1	0.0	1	0.0	0	0.0
Total Assessment Area	26,106	100.0	23,538	100.0	2,414	100.0	154	100.0
	Percentage of Total Businesses:			90.2		9.2		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	10	2.4	10	2.4	0	0.0	0	0.0
Moderate-income	32	7.7	31	7.6	1	12.5	0	0.0
Middle-income	287	68.7	280	68.5	7	87.5	0	0.0
Upper-income	89	21.3	88	21.5	0	0.0	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	418	100.0	409	100.0	8	100.0	1	100.0
	Percentage of Total Farms:			97.8		1.9		.2

2020 FFIEC Census Data and 2020 D&B Information

Assessment Area(s): 2019 Nonmetropolitan Ohio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,796	13.0
Moderate-income	2	6.7	1,812	4.9	458	25.3	6,039	16.3
Middle-income	11	36.7	11,919	32.3	1,020	8.6	7,586	20.5
Upper-income	17	56.7	23,213	62.8	848	3.7	18,523	50.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	30	100.0	36,944	100.0	2,326	6.3	36,944	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	3,503	1,314	3.4	37.5	1,564	44.6	625	17.8
Middle-income	20,447	12,351	31.8	60.4	5,659	27.7	2,437	11.9
Upper-income	33,537	25,156	64.8	75.0	6,605	19.7	1,776	5.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	57,487	38,821	100.0	67.5	13,828	24.1	4,838	8.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	406	350	7.6	53	9.1	3	3.5	
Middle-income	1,641	1,438	31.4	173	29.8	30	34.9	
Upper-income	3,196	2,789	60.9	354	61.0	53	61.6	
Unknown-income	0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	5,243	4,577	100.0	580	100.0	86	100.0	
Percentage of Total Businesses:			87.3		11.1		1.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	3	2	0.3	1	10.0	0	0.0	
Middle-income	119	117	14.9	1	10.0	1	20.0	
Upper-income	678	666	84.8	8	80.0	4	80.0	
Unknown-income	0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	800	785	100.0	10	100.0	5	100.0	
Percentage of Total Farms:			98.1		1.3		.6	

2019 FFIEC Census Data and 2019 D&B Information

Assessment Area(s): 2019 Dayton-Kettering, OH MSA #19430

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	24	13.8	15,725	9.7	6,297	40.0	39,304	24.3
Moderate-income	39	22.4	31,779	19.7	7,134	22.4	28,814	17.8
Middle-income	76	43.7	77,847	48.1	7,426	9.5	32,379	20.0
Upper-income	34	19.5	36,347	22.5	1,291	3.6	61,201	37.8
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	174	100.0	161,698	100.0	22,148	13.7	161,698	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	39,755	11,514	7.0	29.0	17,567	44.2	10,674	26.8
Moderate-income	65,397	28,571	17.4	43.7	26,592	40.7	10,234	15.6
Middle-income	137,930	83,485	50.7	60.5	43,943	31.9	10,502	7.6
Upper income	55,599	41,025	24.9	73.8	11,125	20.0	3,449	6.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	298,681	164,595	100.0	55.1	99,227	33.2	34,859	11.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	2,241	8.6	1,964	8.4	269	10.8	8	4.7
Moderate-income	4,879	18.7	4,252	18.2	601	24.2	26	15.2
Middle-income	12,816	49.2	11,542	49.3	1,170	47.1	104	60.8
Upper-income	6,124	23.5	5,650	24.1	441	17.8	33	19.3
Unknown-income	2	0.0	1	0.0	1	0.0	0	0.0
Total Assessment Area	26,062	100.0	23,409	100.0	2,482	100.0	171	100.0
	Percentage of Total Businesses:			89.8		9.5		.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	10	2.3	10	2.3	0	0.0	0	0.0
Moderate-income	29	6.6	28	6.5	1	12.5	0	0.0
Middle-income	307	69.9	299	69.7	7	87.5	1	50.0
Upper-income	93	21.2	92	21.4	0	0.0	1	50.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	439	100.0	429	100.0	8	100.0	2	100.0
	Percentage of Total Farms:			97.7		1.8		.5

2019 FFIEC Census Data and 2019 D&B Information

Assessment Area(s): 2018 Nonmetropolitan Ohio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,864	13.2
Moderate-income	2	6.7	1,812	4.9	458	25.3	6,100	16.5
Middle-income	11	36.7	11,919	32.3	1,020	8.6	7,637	20.7
Upper-income	17	56.7	23,213	62.8	848	3.7	18,343	49.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	30	100.0	36,944	100.0	2,326	6.3	36,944	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3,503	1,314	3.4	37.5	1,564	44.6	625	17.8
Middle-income	20,447	12,351	31.8	60.4	5,659	27.7	2,437	11.9
Upper-income	33,537	25,156	64.8	75.0	6,605	19.7	1,776	5.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	57,487	38,821	100.0	67.5	13,828	24.1	4,838	8.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	411	7.6	355	7.5	51	8.7	5	4.7
Middle-income	1,710	31.5	1,499	31.6	171	29.3	40	37.7
Upper-income	3,306	60.9	2,884	60.9	361	61.9	61	57.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,427	100.0	4,738	100.0	583	100.0	106	100.0
Percentage of Total Businesses:				87.3		10.7		2.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	2	0.2	2	0.2	0	0.0	0	0.0
Middle-income	129	15.2	127	15.2	1	10.0	1	20.0
Upper-income	719	84.6	706	84.6	9	90.0	4	80.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	850	100.0	835	100.0	10	100.0	5	100.0
Percentage of Total Farms:				98.2		1.2		.6

2018 FFIEC Census Data and 2018 D&B Information

Assessment Area(s): 2018 Dayton, OH MSA #19380

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	24	13.8	15,725	9.7	6,297	40.0	39,304	24.3	
Moderate-income	39	22.4	31,779	19.7	7,134	22.4	28,814	17.8	
Middle-income	76	43.7	77,847	48.1	7,426	9.5	32,379	20.0	
Upper-income	34	19.5	36,347	22.5	1,291	3.6	61,201	37.8	
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0	
Total Assessment Area	174	100.0	161,698	100.0	22,148	13.7	161,698	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	39,755	11,514	7.0	29.0	17,567	44.2	10,674	26.8	
Moderate-income	65,397	28,571	17.4	43.7	26,592	40.7	10,234	15.6	
Middle-income	137,930	83,485	50.7	60.5	43,943	31.9	10,502	7.6	
Upper-income	55,599	41,025	24.9	73.8	11,125	20.0	3,449	6.2	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	298,681	164,595	100.0	55.1	99,227	33.2	34,859	11.7	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	2,188	8.5	1,896	8.2	280	11.0	12	5.1	
Moderate-income	4,819	18.7	4,158	18.1	627	24.6	34	14.3	
Middle-income	12,703	49.2	11,365	49.4	1,193	46.8	145	61.2	
Upper-income	6,090	23.6	5,598	24.3	446	17.5	46	19.4	
Unknown-income	3	0.0	2	0.0	1	0.0	0	0.0	
Total Assessment Area	25,803	100.0	23,019	100.0	2,547	100.0	237	100.0	
Percentage of Total Businesses:			89.2		9.9		.9		
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	8	1.8	8	1.9	0	0.0	0	0.0	
Moderate-income	29	6.7	28	6.6	1	12.5	0	0.0	
Middle-income	315	72.2	307	72.1	7	87.5	1	50.0	
Upper-income	84	19.3	83	19.5	0	0.0	1	50.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	436	100.0	426	100.0	8	100.0	2	100.0	
Percentage of Total Farms:			97.7		1.8		.5		

2018 FFIEC Census Data and 2018 D&B Information

Assessment Area(s): 2017 Nonmetropolitan Ohio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,864	13.2
Moderate-income	2	6.7	1,812	4.9	458	25.3	6,100	16.5
Middle-income	11	36.7	11,919	32.3	1,020	8.6	7,637	20.7
Upper-income	17	56.7	23,213	62.8	848	3.7	18,343	49.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	30	100.0	36,944	100.0	2,326	6.3	36,944	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	3,503	1,314	3.4	37.5	1,564	44.6	625	17.8
Middle-income	20,447	12,351	31.8	60.4	5,659	27.7	2,437	11.9
Upper-income	33,537	25,156	64.8	75.0	6,605	19.7	1,776	5.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	57,487	38,821	100.0	67.5	13,828	24.1	4,838	8.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	393	8.1	335	8.0	53	9.3	5	6.0
Middle-income	1,496	30.8	1,298	30.9	169	29.5	29	34.5
Upper-income	2,962	61.1	2,562	61.1	350	61.2	50	59.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,851	100.0	4,195	100.0	572	100.0	84	100.0
Percentage of Total Businesses:			86.5		11.8		1.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	5	0.6	5	0.6	0	0.0	0	0.0
Middle-income	120	14.8	120	14.9	0	0.0	0	0.0
Upper-income	687	84.6	681	84.5	6	100.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	812	100.0	806	100.0	6	100.0	0	.0
Percentage of Total Farms:			99.3		.7		.0	

2017 FFIEC Census Data and 2017 D&B Information

Assessment Area(s): 2017 Dayton, OH MSA #19380

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	24	13.8	15,725	9.7	6,297	40.0	39,304	24.3
Moderate-income	39	22.4	31,779	19.7	7,134	22.4	28,814	17.8
Middle-income	76	43.7	77,847	48.1	7,426	9.5	32,379	20.0
Upper-income	34	19.5	36,347	22.5	1,291	3.6	61,201	37.8
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	174	100.0	161,698	100.0	22,148	13.7	161,698	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	39,755	11,514	7.0	29.0	17,567	44.2	10,674	26.8
Moderate-income	65,397	28,571	17.4	43.7	26,592	40.7	10,234	15.6
Middle-income	137,930	83,485	50.7	60.5	43,943	31.9	10,502	7.6
Upper-income	55,599	41,025	24.9	73.8	11,125	20.0	3,449	6.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	298,681	164,595	100.0	55.1	99,227	33.2	34,859	11.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,883	8.7	1,580	8.3	297	11.6	6	3.5
Moderate-income	4,054	18.7	3,395	17.9	636	24.9	23	13.4
Middle-income	10,708	49.4	9,407	49.6	1,193	46.7	108	62.8
Upper-income	5,046	23.3	4,581	24.2	430	16.8	35	20.3
Unknown-income	3	0.0	2	0.0	1	0.0	0	0.0
Total Assessment Area	21,694	100.0	18,965	100.0	2,557	100.0	172	100.0
Percentage of Total Businesses:				87.4	11.8		.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	8	2.0	8	2.0	0	0.0	0	0.0
Moderate-income	24	6.0	24	6.1	0	0.0	0	0.0
Middle-income	302	75.1	294	74.6	8	100.0	0	0.0
Upper-income	68	16.9	68	17.3	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	402	100.0	394	100.0	8	100.0	0	.0
Percentage of Total Farms:				98.0	2.0		.0	

2017 FFIEC Census Data and 2017 D&B Information

Assessment Area(s): 2016 Nonmetropolitan Ohio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	5,106	13.4
Moderate-income	2	6.7	2,518	6.6	456	18.1	6,355	16.7
Middle-income	17	56.7	21,509	56.6	1,644	7.6	8,865	23.3
Upper-income	11	36.7	13,964	36.8	572	4.1	17,665	46.5
Unknowns-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	30	100.0	37,991	100.0	2,672	7.0	37,991	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	4,205	1,910	4.7	45.4	1,779	42.3	516	12.3
Middle-income	32,437	23,299	57.1	71.8	6,756	20.8	2,382	7.3
Upper-income	20,349	15,572	38.2	76.5	2,987	14.7	1,790	8.8
Unknowns-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	56,991	40,781	100.0	71.6	11,522	20.2	4,688	8.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	355	6.6	300	6.3	51	9.0	4	4.7
Middle-income	3,209	59.6	2,855	60.3	306	53.9	48	55.8
Upper-income	1,821	33.8	1,576	33.3	211	37.1	34	39.5
Unknowns-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,385	100.0	4,731	100.0	568	100.0	86	100.0
Percentage of Total Businesses:			87.9		10.5		1.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	542	56.7	538	56.6	4	66.7	0	0.0
Upper-income	414	43.3	412	43.4	2	33.3	0	0.0
Unknowns-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	956	100.0	950	100.0	6	100.0	0	.0
Percentage of Total Farms:			99.4		.6		.0	

2016 FFIEC Census Data and 2016 D&B Information

Assessment Area(s): 2016 Dayton, OH MSA #19380

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	20	11.5	13,107	7.9	5,081	38.8	37,445	22.5	
Moderate-income	44	25.3	35,615	21.4	6,155	17.3	31,087	18.6	
Middle-income	77	44.3	79,298	47.6	5,523	7.0	34,877	20.9	
Upper-income	32	18.4	38,676	23.2	1,372	3.5	63,287	38.0	
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0	
Total Assessment Area	174	100.0	166,696	100.0	18,131	10.9	166,696	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	31,024	9,587	5.5	30.9	13,369	43.1	8,068	26.0	
Moderate-income	73,629	34,100	19.6	46.3	28,906	39.3	10,623	14.4	
Middle-income	135,838	85,631	49.3	63.0	38,283	28.2	11,924	8.8	
Upper-income	58,150	44,277	25.5	76.1	10,594	18.2	3,279	5.6	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	298,641	173,595	100.0	58.1	91,152	30.5	33,894	11.3	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
				Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	1,987	8.4	1,659	7.9	322	12.6	6	3.3	
Moderate-income	4,668	19.7	3,997	19.0	647	25.2	24	13.2	
Middle-income	11,279	47.5	10,075	48.0	1,093	42.6	111	61.0	
Upper-income	5,805	24.4	5,264	25.1	500	19.5	41	22.5	
Unknown-income	6	0.0	5	0.0	1	0.0	0	0.0	
Total Assessment Area	23,745	100.0	21,000	100.0	2,563	100.0	182	100.0	
Percentage of Total Businesses:			88.4		10.8		.8		
	Total Farms by Tract	Farms by Tract & Revenue Size							
				Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	6	1.3	6	1.3	0	0.0	0	0.0	
Moderate-income	31	6.7	31	6.8	0	0.0	0	0.0	
Middle-income	343	74.2	336	73.8	7	100.0	0	0.0	
Upper-income	82	17.7	82	18.0	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	462	100.0	455	100.0	7	100.0	0	.0	
Percentage of Total Farms:			98.5		1.5		.0		

2016 FFIEC Census Data and 2016 D&B Information

Appendix C – Lending Tables

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	2	2.2	6.6	119	0.7	4.0	13.0
Moderate	14	15.2	26.9	1,473	9.0	21.0	16.3
Middle	31	33.7	26.3	4,722	28.5	24.4	20.5
Upper	43	46.7	27.4	9,648	58.9	38.4	50.1
Unknown	2	2.2	12.8	422	2.6	12.2	0.0
Total	92	100.0	100.0	16,384	100.0	100.0	100.0
Refinance Loans							
Low	6	3.0	3.3	410	1.2	1.7	13.0
Moderate	19	9.6	12.9	2,272	6.6	8.9	16.3
Middle	30	15.2	23.1	4,225	12.3	19.3	20.5
Upper	132	67.0	47.6	25,799	75.3	55.0	50.1
Unknown	10	5.1	13.0	1,538	4.5	15.1	0.0
Total	197	100.0	100.0	34,244	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.4	0	0.0	5.5	13.0
Moderate	0	0.0	18.0	0	0.0	10.0	16.3
Middle	0	0.0	22.0	0	0.0	13.6	20.5
Upper	1	100.0	55.6	75	100.0	65.9	50.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	75	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	8	2.7	4.6	529	1.0	2.6	13.0
Moderate	33	11.1	18.0	3,745	7.1	13.2	16.3
Middle	61	20.6	24.1	8,947	16.9	20.8	20.5
Upper	177	59.8	40.0	35,572	67.1	47.5	50.1
Unknown	17	5.7	13.3	4,249	8.0	15.9	0.0
Total	296	100.0	100.0	53,042	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2020 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Nonmetropolitan Ohio					
	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	61	17.6	8,702	13.1	87.4
Over \$1 Million	19	5.5	13,611	20.5	11.1
Revenue Unknown	266	76.9	44,104	66.4	1.6
Total	346	100.0	66,417	100.0	
By Loan Size					
\$100,000 or Less	215	62.1	7,032	10.6	
\$100,001 - \$250,000	70	20.2	10,925	16.4	
\$250,001 - \$1 Million	51	14.7	24,608	37.1	
Total	346	100.0	66,417	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	34	55.7	1,456	16.7	
\$100,001 - \$250,000	17	27.9	2,719	31.2	
\$250,001 - \$1 Million	10	16.4	4,528	52.0	
Total	61	100.0	8,702	100.0	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Home Equity Lines of Credit by Borrower Income Level					
Assessment Area: Nonmetropolitan Ohio					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	%	\$(000)	%	
Low	9	11.4	387	8.1	13.0
Moderate	9	11.4	604	12.6	16.3
Middle	20	25.3	1,019	21.3	20.5
Upper	40	50.6	2,744	57.4	50.1
Unknown	1	1.3	29	0.6	0.0
Total	79	100.0	4,782	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Motor Vehicle Secured Lending by Borrower Income Level					
Assessment Area: Nonmetropolitan Ohio					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	%	\$(000)	%	
Low	11	15.7	180	15.3	17.0
Moderate	17	24.3	226	19.3	15.0
Middle	16	22.9	318	27.1	18.2
Upper	26	37.1	449	38.3	49.8
Unknown	0	0.0	0	0.0	0.0
Total	70	100.0	1,173	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level Assessment Area: Dayton-Kettering, OH MSA #19430							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	1	1.9	11.0	32	0.3	6.1	24.3
Moderate	14	26.9	24.6	1,951	18.2	18.5	17.8
Middle	9	17.3	22.3	1,493	13.9	22.3	20.0
Upper	19	36.5	29.4	5,960	55.5	41.0	37.8
Unknown	9	17.3	12.6	1,310	12.2	12.3	0.0
Total	52	100.0	100.0	10,746	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	5.3	0	0.0	2.5	24.3
Moderate	10	14.5	14.0	1,079	7.9	8.9	17.8
Middle	15	21.7	19.9	2,622	19.3	16.2	20.0
Upper	38	55.1	39.5	8,819	64.9	47.4	37.8
Unknown	6	8.7	21.4	1,059	7.8	25.0	0.0
Total	69	100.0	100.0	13,579	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	8.5	0	0.0	4.6	24.3
Moderate	0	0.0	17.8	0	0.0	13.7	17.8
Middle	0	0.0	24.0	0	0.0	19.3	20.0
Upper	0	0.0	48.7	0	0.0	60.5	37.8
Unknown	0	0.0	1.1	0	0.0	1.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							
Low	1	0.8	7.9	32	0.1	4.0	24.3
Moderate	24	18.6	18.6	3,030	11.0	12.9	17.8
Middle	24	18.6	20.6	4,115	15.0	18.0	20.0
Upper	59	45.7	34.6	15,680	57.1	42.0	37.8
Unknown	21	16.3	18.3	4,627	16.8	23.1	0.0
Total	129	100.0	100.0	27,484	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2020 Small Business Lending by Revenue Size of Businesses Assessment Area: Dayton-Kettering, OH MSA #19430					
	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	50	32.3	8,093	28.8	90.2
Over \$1 Million	11	7.1	5,738	20.4	9.2
Revenue Unknown	94	60.6	14,304	50.8	0.6
Total	155	100.0	28,136	100.0	
By Loan Size					
\$100,000 or Less	99	63.9	3,873	13.8	
\$100,001 - \$250,000	24	15.5	3,916	13.9	
\$250,001 - \$1 Million	28	18.1	13,995	49.7	
Total	155	100.0	28,136	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	29	58.0	1,366	16.9	
\$100,001 - \$250,000	12	24.0	1,816	22.4	
\$250,001 - \$1 Million	8	16.0	3,742	46.2	
Total	50	100.0	8,093	100.0	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Home Equity Lines of Credit by Borrower Income Level Assessment Area: Dayton-Kettering, OH MSA #19430					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	%	\$(000)	%	
Low	0	0.0	0	0.0	24.3
Moderate	6	21.4	255	9.2	17.8
Middle	8	28.6	1,345	48.3	20.0
Upper	13	46.4	1,137	40.8	37.8
Unknown	1	3.6	47	1.7	0.0
Total	28	100.0	2,784	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%		\$%
Home Purchase Loans							
Low	5	5.2	5.9	361	2.3	3.6	13.0
Moderate	17	17.7	22.2	1,845	11.7	16.7	16.3
Middle	28	29.2	25.8	4,201	26.6	24.4	20.5
Upper	40	41.7	32.1	8,762	55.5	43.1	50.1
Unknown	6	6.3	14.0	624	4.0	12.2	0.0
Total	96	100.0	100.0	15,793	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	7.3	0	0.0	3.9	13.0
Moderate	3	5.7	13.7	315	3.2	9.0	16.3
Middle	9	17.0	24.2	1,232	12.6	20.2	20.5
Upper	39	73.6	42.5	8,072	82.8	51.4	50.1
Unknown	2	3.8	12.2	135	1.4	15.5	0.0
Total	53	100.0	100.0	9,754	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	7.9	0	0.0	6.5	13.0
Moderate	1	33.3	17.3	90	47.1	13.1	16.3
Middle	0	0.0	23.0	0	0.0	22.0	20.5
Upper	2	66.7	47.6	101	52.9	54.7	50.1
Unknown	0	0.0	4.2	0	0.0	3.7	0.0
Total	3	100.0	100.0	191	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	5	3.2	6.3	361	1.3	3.6	13.0
Moderate	21	13.4	18.0	2,250	7.9	13.1	16.3
Middle	37	23.6	24.6	5,433	19.1	22.2	20.5
Upper	84	53.5	37.5	17,145	60.4	46.1	50.1
Unknown	10	6.4	13.6	3,203	11.3	15.0	0.0
Total	157	100.0	100.0	28,392	100.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level Assessment Area: Dayton-Kettering, OH MSA #19430							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	2	4.3	9.7	226	2.7	5.2	24.3
Moderate	7	14.9	23.7	843	9.9	17.9	17.8
Middle	8	17.0	22.3	1,153	13.6	21.7	20.0
Upper	24	51.1	31.4	5,726	67.5	43.1	37.8
Unknown	6	12.8	12.9	536	6.3	12.2	0.0
Total	47	100.0	100.0	8,484	100.0	100.0	100.0
Refinance Loans							
Low	1	3.0	8.1	72	1.3	3.8	24.3
Moderate	3	9.1	16.3	337	6.2	10.4	17.8
Middle	6	18.2	20.8	523	9.6	17.0	20.0
Upper	22	66.7	36.6	4,464	81.9	44.7	37.8
Unknown	1	3.0	18.2	53	1.0	24.0	0.0
Total	33	100.0	100.0	5,449	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	9.9	0	0.0	6.6	24.3
Moderate	1	100.0	19.2	21	100.0	15.1	17.8
Middle	0	0.0	24.4	0	0.0	20.2	20.0
Upper	0	0.0	44.8	0	0.0	55.7	37.8
Unknown	0	0.0	1.7	0	0.0	2.4	0.0
Total	1	100.0	100.0	21	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	3	3.4	9.3	298	1.9	4.5	24.3
Moderate	13	14.9	20.6	1,283	8.2	14.1	17.8
Middle	14	16.1	21.6	1,676	10.7	18.4	20.0
Upper	47	54.0	33.5	10,255	65.5	40.1	37.8
Unknown	10	11.5	15.1	2,133	13.6	23.0	0.0
Total	87	100.0	100.0	15,645	100.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Home Purchase Loans							
Low	5	4.8	5.7	311	1.8	3.4	13.2
Moderate	20	19.0	25.5	1,997	11.5	18.7	16.5
Middle	20	19.0	23.7	2,316	13.4	22.0	20.7
Upper	56	53.3	31.1	12,120	69.9	43.8	49.7
Unknown	4	3.8	14.1	604	3.5	12.1	0.0
Total	105	100.0	100.0	17,348	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	6.7	0	0.0	4.2	13.2
Moderate	5	20.8	19.2	245	6.8	14.4	16.5
Middle	6	25.0	27.4	731	20.2	23.2	20.7
Upper	12	50.0	38.2	1,617	44.6	48.3	49.7
Unknown	1	4.2	8.5	1,034	28.5	9.9	0.0
Total	24	100.0	100.0	3,627	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	5.2	0	0.0	4.2	13.2
Moderate	1	50.0	19.8	29	19.0	15.9	16.5
Middle	0	0.0	26.6	0	0.0	19.9	20.7
Upper	1	50.0	47.6	124	81.0	59.6	49.7
Unknown	0	0.0	0.8	0	0.0	0.4	0.0
Total	2	100.0	100.0	153	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	5	3.5	5.9	311	1.4	3.6	13.2
Moderate	27	19.1	22.2	2,436	10.9	17.1	16.5
Middle	26	18.4	25.0	3,047	13.6	22.2	20.7
Upper	73	51.8	34.6	14,531	64.9	45.3	49.7
Unknown	10	7.1	12.2	2,071	9.2	11.8	0.0
Total	141	100.0	100.0	22,396	100.0	100.0	100.0
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Dayton, OH MSA #19380							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	2	4.4	8.6	162	1.9	4.5	24.3
Moderate	9	20.0	22.6	934	11.1	16.1	17.8
Middle	7	15.6	22.4	911	10.8	21.0	20.0
Upper	24	53.3	35.2	5,949	70.5	48.5	37.8
Unknown	3	6.7	11.2	480	5.7	10.0	0.0
Total	45	100.0	100.0	8,436	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	9.7	0	0.0	5.5	24.3
Moderate	2	18.2	20.5	133	10.2	15.0	17.8
Middle	1	9.1	23.7	173	13.3	21.4	20.0
Upper	4	36.4	37.4	758	58.3	48.2	37.8
Unknown	4	36.4	8.6	237	18.2	9.9	0.0
Total	11	100.0	100.0	1,301	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	10.5	0	0.0	6.3	24.3
Moderate	0	0.0	18.2	0	0.0	12.6	17.8
Middle	0	0.0	22.4	0	0.0	22.7	20.0
Upper	0	0.0	47.3	0	0.0	55.8	37.8
Unknown	1	100.0	1.5	77	100.0	2.6	0.0
Total	1	100.0	100.0	77	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	2	3.2	8.8	162	1.1	4.2	24.3
Moderate	11	17.7	20.8	1,067	7.5	13.8	17.8
Middle	8	12.9	22.1	1,084	7.6	18.5	20.0
Upper	29	46.8	36.3	6,996	48.9	43.0	37.8
Unknown	12	19.4	12.0	5,006	35.0	20.5	0.0
Total	62	100.0	100.0	14,315	100.0	100.0	100.0
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2017 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	4	4.3	5.3	307	2.6	3.1	13.2
Moderate	21	22.6	24.7	1,902	16.0	18.9	16.5
Middle	28	30.1	25.7	3,591	30.2	24.2	20.7
Upper	35	37.6	26.7	5,768	48.5	39.1	49.7
Unknown	5	5.4	17.7	336	2.8	14.7	0.0
Total	93	100.0	100.0	11,904	100.0	100.0	100.0
Refinance Loans							
Low	1	4.8	4.2	130	4.2	1.9	13.2
Moderate	4	19.0	16.8	551	17.9	11.1	16.5
Middle	4	19.0	23.0	424	13.8	18.8	20.7
Upper	12	57.1	41.0	1,975	64.1	48.8	49.7
Unknown	0	0.0	15.0	0	0.0	19.4	0.0
Total	21	100.0	100.0	3,080	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	8.7	0	0.0	5.1	13.2
Moderate	0	0.0	14.8	0	0.0	10.6	16.5
Middle	0	0.0	24.9	0	0.0	21.4	20.7
Upper	2	33.3	48.9	88	22.6	59.8	49.7
Unknown	4	66.7	2.6	302	77.4	3.1	0.0
Total	6	100.0	100.0	390	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	5	4.2	5.2	437	2.8	2.7	13.2
Moderate	25	20.8	21.3	2,453	16.0	15.7	16.5
Middle	32	26.7	24.7	4,015	26.1	21.9	20.7
Upper	49	40.8	33.1	7,831	50.9	42.2	49.7
Unknown	9	7.5	15.7	638	4.1	17.6	0.0
Total	120	100.0	100.0	15,374	100.0	100.0	100.0
Source: 2017 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2017 HMDA Reportable Loans by Borrower Income Level Assessment Area: Dayton, OH MSA #19380							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%		\$%
Home Purchase Loans							
Low	1	2.3	8.1	93	1.1	4.1	24.3
Moderate	9	20.5	20.7	887	10.2	14.5	17.8
Middle	8	18.2	23.4	1,435	16.4	21.6	20.0
Upper	25	56.8	32.3	6,133	70.2	45.7	37.8
Unknown	1	2.3	15.6	183	2.1	14.1	0.0
Total	44	100.0	100.0	8,731	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	9.2	0	0.0	4.9	24.3
Moderate	2	18.2	16.5	145	7.3	11.0	17.8
Middle	0	0.0	20.9	0	0.0	18.0	20.0
Upper	8	72.7	36.7	1,783	89.8	46.5	37.8
Unknown	1	9.1	16.8	58	2.9	19.6	0.0
Total	11	100.0	100.0	1,986	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	11.9	0	0.0	5.5	24.3
Moderate	1	100.0	21.9	35	100.0	13.8	17.8
Middle	0	0.0	25.1	0	0.0	23.4	20.0
Upper	0	0.0	39.6	0	0.0	53.2	37.8
Unknown	0	0.0	1.6	0	0.0	4.1	0.0
Total	1	100.0	100.0	35	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	1	1.7	8.5	93	0.8	4.0	24.3
Moderate	12	20.0	19.5	1,067	8.7	12.5	17.8
Middle	8	13.3	22.7	1,435	11.7	19.1	20.0
Upper	33	55.0	33.7	7,916	64.4	42.3	37.8
Unknown	6	10.0	15.5	1,789	14.5	22.0	0.0
Total	60	100.0	100.0	12,300	100.0	100.0	100.0
Source: 2017 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2016 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	3	2.2	4.9	213	1.1	2.9	13.4
Moderate	30	22.1	20.9	2,624	14.1	14.9	16.7
Middle	39	28.7	21.1	4,945	26.5	20.3	23.3
Upper	58	42.6	24.6	10,059	53.9	38.4	46.5
Unknown	6	4.4	28.6	832	4.5	23.6	0.0
Total	136	100.0	100.0	18,673	100.0	100.0	100.0
Refinance Loans							
Low	3	3.8	4.5	253	2.1	2.3	13.4
Moderate	6	7.7	11.6	268	2.3	7.7	16.7
Middle	16	20.5	22.9	1,864	15.7	18.9	23.3
Upper	52	66.7	44.7	9,456	79.5	55.3	46.5
Unknown	1	1.3	16.2	51	0.4	15.9	0.0
Total	78	100.0	100.0	11,892	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.2	0	0.0	1.4	13.4
Moderate	0	0.0	12.9	0	0.0	9.2	16.7
Middle	1	20.0	26.9	8	2.2	19.5	23.3
Upper	2	40.0	52.7	60	16.2	62.6	46.5
Unknown	2	40.0	4.3	302	81.6	7.3	0.0
Total	5	100.0	100.0	370	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	6	2.7	4.6	466	1.4	2.6	13.4
Moderate	36	16.3	17.1	2,892	8.6	11.9	16.7
Middle	56	25.3	22.0	6,817	20.4	19.4	23.3
Upper	112	50.7	33.4	19,575	58.5	44.4	46.5
Unknown	11	5.0	22.9	3,726	11.1	21.8	0.0
Total	221	100.0	100.0	33,476	100.0	100.0	100.0
Source: 2016 FFIEC Census Data							
2006-2010 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2016 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Dayton, OH MSA #19380							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	6	8.2	6.1	386	3.4	3.1	22.5
Moderate	10	13.7	17.3	1,111	9.7	12.6	18.6
Middle	7	9.6	18.6	957	8.3	18.0	20.9
Upper	38	52.1	27.6	7,419	64.6	40.7	38.0
Unknown	12	16.4	30.4	1,613	14.0	25.5	0.0
Total	73	100.0	100.0	11,486	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	5.4	0	0.0	2.7	22.5
Moderate	3	8.3	10.7	329	5.9	6.9	18.6
Middle	8	22.2	16.0	901	16.3	12.7	20.9
Upper	14	38.9	37.1	3,384	61.0	46.8	38.0
Unknown	11	30.6	30.7	929	16.8	30.9	0.0
Total	36	100.0	100.0	5,543	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	7.6	0	0.0	2.3	22.5
Moderate	0	0.0	16.6	0	0.0	9.8	18.6
Middle	0	0.0	21.5	0	0.0	17.9	20.9
Upper	0	0.0	49.4	0	0.0	65.6	38.0
Unknown	5	100.0	4.8	280	100.0	4.4	0.0
Total	5	100.0	100.0	280	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	6	5.1	5.9	386	2.2	2.7	22.5
Moderate	13	11.1	15.0	1,440	8.1	9.8	18.6
Middle	15	12.8	17.8	1,858	10.4	15.1	20.9
Upper	52	44.4	31.7	10,803	60.4	40.4	38.0
Unknown	31	26.5	29.7	3,387	18.9	31.9	0.0
Total	117	100.0	100.0	17,874	100.0	100.0	100.0
Source: 2016 FFIEC Census Data							
2006-2010 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	1.1	6.2	39	0.2	3.8	3.4
Middle	20	21.7	38.6	2,499	15.3	34.7	31.8
Upper	71	77.2	55.3	13,846	84.5	61.5	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	92	100.0	100.0	16,384	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	2.5	2.3	395	1.2	1.3	3.4
Middle	28	14.2	30.1	4,600	13.4	26.5	31.8
Upper	164	83.2	67.6	29,249	85.4	72.1	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	197	100.0	100.0	34,244	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	5.4	0	0.0	3.6	3.4
Middle	1	100.0	30.2	75	100.0	22.1	31.8
Upper	0	0.0	64.4	0	0.0	74.3	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	75	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.7	0	0.0	2.1	13.7
Middle	0	0.0	23.1	0	0.0	45.5	44.2
Upper	5	100.0	69.2	2,289	100.0	52.5	42.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	2,289	100.0	100.0	0.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	2.0	4.0	434	0.8	2.4	3.4
Middle	49	16.6	33.4	7,174	13.5	29.9	31.8
Upper	241	81.4	62.7	45,434	85.7	67.7	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	296	100.0	100.0	53,042	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	7	2.0	449	0.7	7.7
Middle	91	26.3	25,255	38.0	31.4
Upper	248	71.7	40,713	61.3	60.9
Unknown	0	0.0	0	0.0	0.0
Total	346	100.0	66,417	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 Home Equity Lines of Credit by Income Level of Geography Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	1	1.3	65	1.4	3.4
Middle	15	19.0	701	14.7	31.8
Upper	63	79.7	4,016	84.0	64.8
Unknown	0	0.0	0	0.0	0.0
Total	79	100.0	4,782	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 Motor Vehicle Secured Lending by Income Level of Geography Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Households %
	#	%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	1	1.4	19	1.6	5.5
Middle	13	18.6	188	16.0	34.2
Upper	56	80.0	965	82.3	60.3
Unknown	0	0.0	0	0.0	0.0
Total	70	100.0	1,173	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Dayton-Kettering, OH MSA #19430							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	4	7.7	3.4	153	1.4	1.6	7.0
Moderate	3	5.8	14.7	300	2.8	9.5	17.4
Middle	29	55.8	53.7	5,965	55.5	49.1	50.7
Upper	16	30.8	28.2	4,328	40.3	39.9	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	52	100.0	100.0	10,746	100.0	100.0	100.0
Refinance Loans							
Low	1	1.4	1.1	39	0.3	0.5	7.0
Moderate	4	5.8	8.3	327	2.4	4.9	17.4
Middle	40	58.0	50.1	8,067	59.4	44.3	50.7
Upper	24	34.8	40.6	5,146	37.9	50.3	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	69	100.0	100.0	13,579	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.4	0	0.0	1.7	7.0
Moderate	0	0.0	11.7	0	0.0	7.5	17.4
Middle	0	0.0	49.4	0	0.0	45.9	50.7
Upper	0	0.0	35.4	0	0.0	44.9	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	1	14.3	22.0	303	9.6	7.9	16.5
Moderate	3	42.9	18.3	1,725	54.8	12.7	28.8
Middle	2	28.6	40.2	744	23.6	49.4	41.2
Upper	1	14.3	19.5	376	11.9	30.0	13.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	3,148	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	6	4.7	2.4	495	1.8	1.4	7.0
Moderate	10	7.8	11.8	2,352	8.6	7.6	17.4
Middle	72	55.8	52.0	14,787	53.8	47.0	50.7
Upper	41	31.8	33.8	9,850	35.8	44.0	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	129	100.0	100.0	27,484	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 Small Business Lending by Income Level of Geography					
Assessment Area: Dayton-Kettering, OH MSA #19430					
Geographic Income Level	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
Low	0	0.0	0	0.0	8.6
Moderate	3	1.9	174	0.6	18.8
Middle	97	62.6	17,739	63.0	49.0
Upper	55	35.5	10,223	36.3	23.6
Unknown	0	0.0	0	0.0	0.0
Total	155	100.0	28,136	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 Home Equity Lines of Credit by Income Level of Geography					
Assessment Area: Dayton-Kettering, OH MSA #19430					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	%	\$(000)	%	
Low	0	0.0	0	0.0	7.0
Moderate	0	0.0	0	0.0	17.4
Middle	15	53.6	1,748	62.8	50.7
Upper	13	46.4	1,036	37.2	24.9
Unknown	0	0.0	0	0.0	0.0
Total	28	100.0	2,784	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	3.1	7.6	247	1.6	4.8	3.4
Middle	31	32.3	38.7	4,450	28.2	34.6	31.8
Upper	62	64.6	53.6	11,096	70.3	60.6	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	96	100.0	100.0	15,793	100.0	100.0	0.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.3	0	0.0	1.7	3.4
Middle	8	15.1	31.3	1,085	11.1	26.4	31.8
Upper	45	84.9	65.5	8,669	88.9	71.9	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	53	100.0	100.0	9,754	100.0	100.0	0.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.1	0	0.0	1.8	3.4
Middle	1	33.3	34.6	65	34.0	36.0	31.8
Upper	2	66.7	62.3	126	66.0	62.2	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	191	100.0	100.0	0.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	25.0	0	0.0	5.4	13.7
Middle	0	0.0	37.5	0	0.0	28.0	44.2
Upper	2	100.0	37.5	2,444	100.0	66.6	42.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	2,444	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	1.9	5.5	247	0.9	3.4	3.4
Middle	42	26.8	35.1	5,772	20.3	31.1	31.8
Upper	112	71.3	59.4	22,373	78.8	65.5	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	157	100.0	100.0	28,392	100.0	100.0	0.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Dayton-Kettering, OH MSA #19430							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	2	4.3	3.3	150	1.8	1.7	7.0
Moderate	3	6.4	13.6	245	2.9	8.5	17.4
Middle	32	68.1	53.9	5,778	68.1	49.3	50.7
Upper	10	21.3	29.2	2,311	27.2	40.5	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	47	100.0	100.0	8,484	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.6	0	0.0	0.7	7.0
Moderate	3	9.1	8.9	202	3.7	5.2	17.4
Middle	21	63.6	53.0	3,696	67.8	47.1	50.7
Upper	9	27.3	36.5	1,551	28.5	47.0	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	33	100.0	100.0	5,449	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.4	0	0.0	1.3	7.0
Moderate	0	0.0	12.0	0	0.0	7.2	17.4
Middle	1	100.0	54.5	21	100.0	51.2	50.7
Upper	0	0.0	31.1	0	0.0	40.4	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	21	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	7.8	0	0.0	2.2	16.5
Moderate	1	33.3	28.4	625	40.5	20.1	28.8
Middle	2	66.7	49.0	919	59.5	53.9	41.2
Upper	0	0.0	14.7	0	0.0	23.8	13.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	1,544	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	2	2.3	2.9	150	1.0	1.5	7.0
Moderate	7	8.0	12.3	1,072	6.9	8.6	17.4
Middle	58	66.7	53.6	10,540	67.4	49.1	50.7
Upper	20	23.0	31.2	3,883	24.8	40.8	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	87	100.0	100.0	15,645	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	1.9	5.4	105	0.6	3.7	3.4
Middle	25	23.8	37.6	3,275	18.9	33.4	31.8
Upper	78	74.3	56.9	13,968	80.5	62.9	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	105	100.0	100.0	17,348	100.0	100.0	0.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.1	0	0.0	2.5	3.4
Middle	3	12.5	35.9	231	6.4	32.4	31.8
Upper	21	87.5	60.0	3,396	93.6	65.1	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	24	100.0	100.0	3,627	100.0	100.0	0.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.8	0	0.0	1.7	3.4
Middle	0	0.0	35.3	0	0.0	36.1	31.8
Upper	2	100.0	61.9	153	100.0	62.2	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	153	100.0	100.0	0.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	100.0	25.0	9	100.0	1.3	13.7
Middle	0	0.0	75.0	0	0.0	98.7	44.2
Upper	0	0.0	0.0	0	0.0	0.0	42.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	9	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	2.1	4.9	114	0.5	3.4	3.4
Middle	31	22.0	36.6	3,797	17.0	33.2	31.8
Upper	107	75.9	58.5	18,485	82.5	63.4	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	141	100.0	100.0	22,396	100.0	100.0	0.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Dayton, OH MSA #19380							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	3.2	0	0.0	1.3	7.0
Moderate	4	8.9	14.5	271	3.2	8.9	17.4
Middle	26	57.8	53.9	4,535	53.8	49.7	50.7
Upper	15	33.3	28.4	3,630	43.0	40.0	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	45	100.0	100.0	8,436	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.4	0	0.0	1.2	7.0
Moderate	4	36.4	12.0	237	18.2	7.4	17.4
Middle	7	63.6	53.6	1,064	81.8	49.6	50.7
Upper	0	0.0	32.0	0	0.0	41.9	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	11	100.0	100.0	1,301	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.8	0	0.0	2.7	7.0
Moderate	1	100.0	14.4	77	100.0	8.0	17.4
Middle	0	0.0	48.0	0	0.0	48.9	50.7
Upper	0	0.0	30.8	0	0.0	40.3	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	77	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	16.9	0	0.0	1.6	16.5
Moderate	0	0.0	25.3	0	0.0	26.3	28.8
Middle	4	100.0	44.6	4,424	100.0	56.4	41.2
Upper	0	0.0	13.3	0	0.0	15.6	13.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	4,424	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	3.5	0	0.0	1.5	7.0
Moderate	9	14.5	14.2	585	4.1	10.6	17.4
Middle	38	61.3	52.9	10,100	70.6	50.1	50.7
Upper	15	24.2	29.4	3,630	25.4	37.7	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	62	100.0	100.0	14,315	100.0	100.0	100.0
Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2017 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	6.5	5.9	385	3.2	4.1	3.4
Middle	24	25.8	38.0	2,699	22.7	33.6	31.8
Upper	63	67.7	56.1	8,820	74.1	62.3	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	93	100.0	100.0	11,904	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.6	0	0.0	1.2	3.4
Middle	5	23.8	33.6	705	22.9	28.6	31.8
Upper	16	76.2	63.8	2,375	77.1	70.2	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	21	100.0	100.0	3,080	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	33.3	6.1	148	37.9	4.4	3.4
Middle	2	33.3	38.0	124	31.8	36.2	31.8
Upper	2	33.3	55.9	118	30.3	59.5	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	390	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	13.7
Middle	0	0.0	75.0	0	0.0	86.8	44.2
Upper	0	0.0	25.0	0	0.0	13.2	42.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	6.7	4.8	533	3.5	3.1	3.4
Middle	31	25.8	36.7	3,528	22.9	33.1	31.8
Upper	81	67.5	58.5	11,313	73.6	63.8	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	120	100.0	100.0	15,374	100.0	100.0	100.0
<i>Source: 2017 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of 2017 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Dayton, OH MSA #19380							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	2.5	0	0.0	1.2	7.0
Moderate	3	6.8	14.3	311	3.6	9.0	17.4
Middle	25	56.8	54.1	5,072	58.1	48.8	50.7
Upper	16	36.4	29.2	3,348	38.3	41.0	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	44	100.0	100.0	8,731	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.9	0	0.0	1.5	7.0
Moderate	2	18.2	13.7	161	8.1	9.8	17.4
Middle	7	63.6	54.2	1,307	65.8	48.8	50.7
Upper	2	18.2	29.1	518	26.1	39.8	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	11	100.0	100.0	1,986	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.9	0	0.0	2.7	7.0
Moderate	1	100.0	18.9	35	100.0	9.2	17.4
Middle	0	0.0	51.9	0	0.0	53.3	50.7
Upper	0	0.0	22.3	0	0.0	34.8	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	35	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	7.6	0	0.0	3.4	16.5
Moderate	1	25.0	21.2	188	12.1	12.7	28.8
Middle	1	25.0	36.4	981	63.4	44.2	41.2
Upper	2	50.0	34.8	379	24.5	39.7	13.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	1,548	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	2.9	0	0.0	1.5	7.0
Moderate	7	11.7	14.4	695	5.7	9.5	17.4
Middle	33	55.0	53.9	7,360	59.8	48.5	50.7
Upper	20	33.3	28.8	4,245	34.5	40.5	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	60	100.0	100.0	12,300	100.0	100.0	100.0
Source: 2017 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2016 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	5.1	4.7	967	5.2	3.7	4.7
Middle	60	44.1	63.4	7,755	41.5	60.0	57.1
Upper	69	50.7	31.9	9,951	53.3	36.3	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	136	100.0	100.0	18,673	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	3.8	4.1	445	3.7	2.7	4.7
Middle	29	37.2	53.3	4,184	35.2	49.8	57.1
Upper	46	59.0	42.6	7,263	61.1	47.5	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	78	100.0	100.0	11,892	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	6.5	0	0.0	1.8	4.7
Middle	1	20.0	59.7	8	2.2	61.5	57.1
Upper	4	80.0	33.9	362	97.8	36.7	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	370	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	50.0	20.0	830	32.7	11.4	16.9
Middle	1	50.0	40.0	1,711	67.3	55.8	63.5
Upper	0	0.0	40.0	0	0.0	32.8	19.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	2,541	100.0	100.0	0.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	11	5.0	4.6	2,242	6.7	3.5	4.7
Middle	91	41.2	59.5	13,658	40.8	56.3	57.1
Upper	119	53.8	35.9	17,576	52.5	40.3	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	221	100.0	100.0	33,476	100.0	100.0	100.0
Source: 2016 FFIEC Census Data							
2006-2010 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2016 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Dayton, OH MSA #19380							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	2.3	0	0.0	1.6	5.5
Moderate	11	15.1	13.4	1,171	10.2	8.6	19.6
Middle	45	61.6	54.3	6,717	58.5	48.0	49.3
Upper	17	23.3	30.0	3,598	31.3	41.8	25.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	73	100.0	100.0	11,486	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.2	0	0.0	1.3	5.5
Moderate	5	13.9	12.3	347	6.3	7.5	19.6
Middle	23	63.9	48.8	3,222	58.1	43.4	49.3
Upper	8	22.2	36.7	1,974	35.6	47.9	25.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	36	100.0	100.0	5,543	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.9	0	0.0	1.8	5.5
Moderate	0	0.0	15.9	0	0.0	7.3	19.6
Middle	5	100.0	50.8	280	100.0	48.3	49.3
Upper	0	0.0	29.4	0	0.0	42.6	25.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	280	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	14.8	0	0.0	20.6	12.8
Moderate	1	33.3	24.6	308	54.5	15.0	26.2
Middle	2	66.7	50.8	257	45.5	54.3	46.9
Upper	0	0.0	9.8	0	0.0	10.1	14.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	565	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	2.4	0	0.0	2.8	5.5
Moderate	17	14.5	13.2	1,826	10.2	8.6	19.6
Middle	75	64.1	52.2	10,476	58.6	47.0	49.3
Upper	25	21.4	32.2	5,572	31.2	41.6	25.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	117	100.0	100.0	17,874	100.0	100.0	100.0
Source: 2016 FFIEC Census Data							
2006-2010 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Appendix D – 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/AA.

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

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1.0 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

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

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

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

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

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

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

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

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

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1.0 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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