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PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Dollar Bank, Federal Savings Bank Charter Number 708043

> 3 Gateway Ctr - 9th Floor Pittsburgh, PA 15222-1004

Office of the Comptroller of the Currency

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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, and should not 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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Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of Dollar Bank, Federal Savings Bank with respect to the Lending, Investment, and Service Tests:

	(Name of Depository Institution) Performance Tests		
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding		X	Х
High Satisfactory	Х		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

^{*}The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The bank originates a majority of loans inside its assessment areas (AA);
- The bank's overall lending activity is good;
- The bank's overall geographic distribution of loans is good, as evidenced by overall good home mortgage performance and good small loans to businesses performance;
- The bank's overall borrower income distribution of loans is good, as evidenced by overall good distribution of home mortgage loans by income level of borrower and adequate distribution of loans to businesses with different revenue sizes:
- Community development lending is strong has a positive impact on the Lending Test;
- The bank has an overall excellent level of qualified CD investments that are responsive to community needs. The bank makes extensive use of complex investments to support CD initiatives;
- The bank is a leader in providing community development services; and,
- Bank branch delivery systems are readily accessible to all individuals in various income levels and geographies throughout the AAs. Services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies and/or individuals. Additionally, the bank opened one branch during the assessment period in a low-income geography that includes convenient and extended operating hours.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

Census Tract (CT): 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 areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending on population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

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

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound

operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., 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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central-county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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 multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

Dollar Bank, Federal Savings Bank (Dollar Bank or the bank), headquartered in Pittsburgh, Pennsylvania, is an interstate, federally-charted mutual savings bank. As of December 31, 2015, the bank had total assets of approximately \$7.3 billion. Dollar Bank has no holding company. Dollar Bank has nine operating subsidiaries: Colton Enterprise, Inc., Dollar Finance, Inc., Dollar Bank Insurance Agency, Dollar Bank Leasing Corp., Fourth Avenue Finance LLC, Dollar Bank Settlement Services, Inc., The New Market Corporation, CFS Service Corporation, and Citizens Service Corporation. These subsidiaries are not included within the scope of this performance evaluation. Dollar Bank engaged in no merger and acquisition activity during the evaluation period.

Dollar Bank is a full-service bank that operates 67 total branches; 38 are located in the Pittsburgh AA, 27 are located in the Cleveland AA, and two are located in the Akron AA, specifically in Summit County. Dollar Bank operates 127 deposit-taking automated teller machines (ATMs), of which 54 are drive-through facilities, and 9 are stand-alone machines. There are 27 branch offices that offer access to more than one ATM. Dollar Bank operates 82 ATMs in the Pittsburgh AA, and 45 in the Cleveland and Akron AAs.

In the Pittsburgh AA, Dollar Bank opened a branch, located within a grocery store. The store and the branch are in a Pittsburgh AA low-income census tract. This branch and single grocery store will serve 1,309 households and 411 families. This census tract has a poverty level above 53 percent. This grocery store was the first in, or near, this census tract for over 30 years. The branch is open Tuesday through Sunday, with extended hours of operations. The office is equipped with a walk-up personal teller machine (PTM) that provides customers with an alternative to an on-location live teller. Additionally, the branch has a smart ATM that permits immediate recognition of cash deposits and expedited availability of check deposits.

No branches were closed during the evaluation period. One ATM was removed on April 30, 2014 that was located in a middle-income census tract in the Pittsburgh AA during the evaluation period. Please refer to Appendices A and C for a detailed description of the bank's AA.

Dollar Bank is a full-service institution, offering a standard selection of traditional loan and deposit products for both personal and business customers. Dollar Bank's website, https://dollar.bank/Personal, provides a full listing and description of its deposit and loan services. The bank also offers a variety of different account access alternatives including telephone banking, online banking with bill pay options, e-statements, and a mobile banking application. In addition, to the above services for consumer accounts, the bank also offers a wide variety of account access alternatives for their business customers, which include online banking for business customers, cash management services, automated clearing house (ACH) manager, credit card services, and lockbox services.

As of December 31, 2015, deposits totaled approximately \$5.8 billion, and tier 1 capital was \$826.6 million. Net loans and leases totaled approximately \$5.9 billion, or 80.6 percent of total assets, as of the same date. The bank's strategic focus is on residential mortgages and consumer loans with continued gradual increase in commercial and private lending. Dollar Bank

seeks to expand its lending to customers primarily located in its local markets without sacrificing prudent underwriting standards.

The following table provided a summary of the loan mix:

Loan Portfolio Summary By Loan Product December 31, 2015		
Loan Category	% of Gross Loans and Leases	
1-4 Family Residential Mortgage - Closed End	70.84%	
Commercial Real Estate	9.08%	
Commercial & Industrial	8.00%	
Home Equity	5.57%	
Construction and Development	3.27%	
Consumer Loans	2.08%	
All Other Loans and Leases	1.12%	
Loans to Non-depository Financial Institutions	0.04%	

Source: FDIC Call Report December 31, 2015.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its assessment areas. The last CRA performance evaluation was dated June 29, 2013, and used large bank procedures. Dollar Bank received an "Outstanding" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we analyzed home purchase, home improvement, and home refinance mortgage loans that the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses the bank reported under the Community Reinvestment Act (CRA), for the period of January 1, 2013 through December 31, 2015. Multifamily loans are not a primary loan product; therefore, we did not evaluate this product separately. We reviewed community development (CD) loans, investments, and services for the period of July 30, 2013 through December 31, 2015. Performance Tables 1 through 11 and 1a through 11a in Appendix D include only data covered by the 2010 Census, namely 2014 through 2015. Data from 2013 is discussed in the applicable narrative sections of this performance evaluation.

Data Integrity

Prior to the start of this performance evaluation, we reviewed the bank's HMDA and CRA lending data to determine the accuracy and reliability of the data for use in this performance evaluation. Community development loans, investments, and services submitted by bank management were verified to ensure they met the regulatory definition of community development. We did not note any accuracy nor reliability concerns with the reviewed HMDA and CRA lending data, or with the community development lending, investments and services information.

Selection of Areas for Full-Scope Review

We selected one AA in each state where the bank has an office for a full-scope review. Full-scope reviews consider performance context, quantitative, and qualitative factors. In general, the AAs selected for the full-scope review were chosen because they represented a significant portion of the bank's deposit base and lending business in that state. Any AA not selected was analyzed using limited-scope procedures. Limited-scope procedures consider quantitative factors only. Refer to the "Scope" section under each State Rating section for details regarding how we selected the areas for review.

Ratings

In this performance evaluation, we placed more weight on the bank's performance in 2014 through 2015 than to its performance in 2013 to reach our conclusions. The bank's overall rating is a blend of the state ratings, based on results in those areas that received full-scope reviews. Performance in the state of Pennsylvania was most heavily weighted in arriving at overall conclusions as the substantial majority of the bank's branches, deposits, and loans are located here. The Pittsburgh AA accounted for 68.6 percent of deposits, 56.7 percent of the branches, 73.6 percent of home purchase loans, 77.7 percent of home refinance loans, 79.4 percent of home improvement loans, and 67.1 percent of small loans to businesses. Refer to the "Scope" section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Additionally, when evaluating the bank's performance under the Lending Test, we placed a higher weight on the bank's distribution of home mortgage loans than the distribution of small business loans. Within the home mortgage category, greater weight was placed on home purchase loans, with home improvement loans and home refinancing loans receiving less weight. We placed emphasis on home loans due to it being the bank's primary loan product, and also based on the affordable housing credit needs in all the bank's AAs. Secondary emphasis was placed on small business loan performance due to the identified community credit need in all the bank's AAs.

Inside/Outside Ratio

The analysis of the bank's lending within its AAs concluded the bank originates or purchases a majority of loans in their AAs. During the evaluation period, 84.9 percent of the number and 70.7 percent of the dollar amount of total home mortgage and small loans to businesses were within the bank's AA. For all home mortgage products, 84.4 percent of the number and 69.4 percent of the dollar amount were within the bank's AA. For small loans to businesses, 92.1 percent of the number and 89.7 percent of the dollar amount were within the AA. This performance contributes positively to the Lending Test.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c) and 195.28(c), in determining a national bank's (bank) or federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development (HUD), and the Consumer Financial Protection Bureau (CFPB).

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

The OCC does not have [additional] public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining the institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

State Rating

State of Pennsylvania

CRA Rating for Pennsylvania¹: Outstanding The Lending Test is rated: High Satisfactory The Investment Test is rated: Outstanding The Service Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of home mortgage loans is good and the small loans to businesses by income level of the geography is good;
- The borrower distribution of home mortgage loans by income level of the borrower is good and distribution of small loans to businesses is adequate;
- Community development lending in Pennsylvania is good and has a positive impact on the Lending Test;
- Flexible loan programs have a positive impact on the lending performance;
- The bank has an excellent level of community development investments and donations and demonstrates excellent responsiveness to identified credit needs within the Pittsburgh AA;
- Accessibility to the bank's delivery systems in the state is excellent; and,
- The bank's level in providing community development services is excellent.

Description of Institution's Operations in Pennsylvania

The Pittsburgh AA contains 605 geographies in the counties of Allegheny, Butler, Washington and Westmoreland, which are located in the Pittsburgh, PA MSA, 38300. Dollar Bank has 38 branch offices in the Pittsburgh AA. Allegheny County has 30 full-service branches, plus deposit taking facilities and ATMs at 2 senior citizen complexes. The bank also has 2 full-service branch offices in Butler County, 2 branch offices in Washington County, and 4 branch offices in Westmoreland County. During the evaluation period, Dollar Bank opened one new branch office in Allegheny County, and the bank had one branch office that was relocated. Dollar Bank has 82 ATM machines in the Pittsburgh AA, of which 67 are deposit-taking, 27 drive thru ATMs and 7 are stand-alone ATM facilities.

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For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

As of June 30, 2015, Dollar Bank held a 3.5 percent deposit market share and ranked sixth of 46 depository institutions doing business in the Pittsburgh AA. The top three institutions by deposit share are PNC Bank, Bank of NY Mellon, and Citizens Bank. With regard to mortgage loans originated during 2015, Dollar Bank held an 8.8 percent market share by number and a 6.7 percent market share by dollar amount, and ranked second by number and dollar amount among 475 HMDA reporters. The top originator by market share was Wells Fargo and PNC Bank ranked third.

Refer to the market profiles for the state of Pennsylvania in appendix D for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Pennsylvania

The assessment area in Pennsylvania was reviewed as one assessment area. This assessment area received a full-scope review and includes portions of the Pittsburgh, Metropolitan Statistical Area, 38300. The counties included in the assessment area are, Allegheny, Butler, Washington and Westmoreland. Dollar Bank operates 38 full service branches within the AA. The Pittsburgh AA consists of 605 census tracts, comprised of 44 low-income tracts (7.3 percent), 130 moderate-income tracts (21.5 percent), 276 middle-income tracts (45.6 percent), 141 upper-income tracts (23.3 percent) and the remaining 14 unknown. Dollar Bank has 3 branches in low-income tracts, 2 in moderate-income tracts, 18 in middle-income tracts and 14 in upper-income tracts.

The Pittsburgh AA represents a majority of the bank's branching network, deposit base, and lending activity. The assessment area accounted for 68.6 percent of deposits, 56.7 percent of the branches, 73.6 percent of home purchase loans, 77.7 percent of home refinance loans, 79.4 percent of home improvement loans, and 67.1 percent of small loans to businesses.

In terms of individual loans products, home mortgages received more weight than loans to small businesses. Based on all loans originated and/or purchased in Pennsylvania, 93.3 percent were home mortgages. Furthermore, within home mortgage loans more weight was placed on home purchase loans as they comprised 23.7 percent of all residential mortgage loans, and are the basis for the following types of loans. Home refinance loans accounted for 42.7 percent of mortgage loans followed by 33.6 percent for home improvement loans. Loans to small businesses only accounted for 7.1 percent of the bank's originations in the Pittsburgh AA.

The bank originated a very low volume of multifamily loans during the evaluation period; therefore, an analysis of these loans was not meaningful. The bank did not make any small loans to farms during the evaluation period; therefore, an analysis of small loans to farms was not performed during this performance evaluation. Consumer loans were also not evaluated as they constitute a small portion of the bank's business.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Pennsylvania is rated "High Satisfactory." Based on the full-scope review, the bank's performance in the Pittsburgh AA was good. The level of community development lending is good and had a positive impact on the bank's performance and the overall Lending Test.

Lending Activity

Refer to Tables 1 Lending Volume section of appendix D for the facts and data used to evaluate the bank's lending activity.

Dollar Bank's overall lending activity in the Pittsburgh AA is good. We evaluated the bank's lending performance for the period January 1, 2014 through December 31, 2015 using 2015 Peer Mortgage Data.

Based on Federal Financial Institutions Examination Council (FFIEC) 2015 Peer Mortgage Data – US and PR, the bank achieved an 8.8 percent market share of home mortgage loans by count, ranking 2nd. The bank achieved 3.7 percent of home purchases by count, ranking 4th. The bank achieved a 26.4 percent market share of home improvement loans by count, ranking 1st and achieved a 10.9 percent market share of home refinance loans by count, ranking 2nd. The number of reporting lenders in the AA was 475, with the top thirty lenders holding 68.3 percent of the market share by count.

Small business lending is highly competitive in the AA. Dollar Bank competed with 107 total lenders for small business lending in 2015. The top five lenders control a majority of the market with a combined market share of 65.7 percent. Individual market shares of these card banks ranged from 5.1 percent to 28.8 percent.

For loans to small businesses in 2015, based on FFIEC 2015 Peer Small Business Data – US and PR, Dollar Bank achieved a 0.9 percent market share by count, ranking 18th of the 107 reporting lenders in the Pittsburgh AA. The bank achieved a 0.9 percent market share of low-income tracts by count, ranking 14th.

The Federal Deposit Insurance Corporation's Institutions Deposit Market Share Report, as of June 30, 2015, indicates 46 institutions operating within Allegheny, Butler, Washington, and Westmoreland County within the Pittsburgh AA. Dollar Bank ranks 6th with deposit market share in Allegheny, Butler, Washington, and Westmoreland County of 3.5 percent.

Distribution of Loans by Income Level of the Geography

The geographic distribution of home mortgage loans in the assessment area is good and the geographic distribution of small loans to businesses is good.

Home Mortgage Loans

Overall, the geographic distribution for home mortgage loans is good. The geographic distribution is good from 2014 through 2015. Refer to Tables 2, 3, 4 and in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The bank's geographic distribution for home purchase loans is excellent.

The bank's geographic distribution of home purchase loans is excellent from 2014 through 2015. The percentage of home purchase loans made in low-income geographies exceeds the percentage of aggregate peer lending in low-income geographies. The percentage of home purchase loans made in moderate-income geographies is near to the percentage of aggregate peer lending in moderate-income geographies. The bank's percentage of home purchase loans made in low-income geographies is near to the percentage of owner-occupied housing units in low-income areas. The percentage of home purchase loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in moderate-income areas.

The bank's geographic distribution of home purchase loans in 2013 is consistent with 2014 through 2015. The percentage of home purchase loans made in low-income geographies is near to the percentage of aggregate peer lending in low-income geographies. The percentage of home purchase loans made in moderate-income geographies exceeds the percentage of aggregate peer lending in moderate-income geographies. The percentage of home purchase loans made in low-income geographies is near to the percentage of owner-occupied housing units in low-income tracts; while in moderate-income geographies the percentage is somewhat lower than the percentage of owner-occupied housing units in moderate-income tracts.

Home Improvement Loans

The bank's geographic distribution for home improvement loans is good.

The percentage of home improvement loans made in low-income geographies is near to the percentage of aggregate peer lending in low-income geographies. The percentage of home improvement loans made in moderate-income geographies is near to the percentage of aggregate peer lending in moderate-income geographies. The bank's percentage of home improvement loans made in low-income geographies is near to the percentage of owner-occupied housing units in low-income areas. The bank's percentage of home improvement loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in moderate-income areas.

The bank's geographic distribution of home improvement loans in 2013 is consistent with 2014 through 2015. The percentage of home purchase loans made in low-income geographies is near to the percentage of aggregate peer lending in low-income geographies. The percentage of home improvement loans made in moderate-income geographies is somewhat lower than the percentage of aggregate peer lending in moderate-income geographies. The percentage of

home improvement loans made in low-income geographies is near to the percentage of owner-occupied housing units in low-income tracts; while in moderate-income geographies the percentage is somewhat lower than the percentage of owner-occupied housing units in moderate-income tracts.

Home Refinance Loans

The bank's geographic distribution for home refinance loans is good.

The bank's geographic distribution of home mortgage refinance loans is good from 2014 through 2015. The percentage of home refinance loans made in low-income and moderate-income geographies is near to the percentage of aggregate peer lending in both geographies. The bank's percentage of home refinance loans made in low-income geographies is near to the percentage of owner-occupied housing units in low-income areas. The percentage of home refinance loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in moderate-income areas.

The bank's geographic distribution of home mortgage refinance loans in 2013 is consistent with 2014 through 2015. The percentage of home refinance loans made in low-income geographies exceeds the percentage of aggregate peer lending in low-income geographies. The percentage of home improvement loans made in moderate-income geographies is somewhat lower than the percentage of aggregate peer lending in moderate-income geographies. The bank's percentage of home refinance loans made in low-income geographies is near to the percentage of owner-occupied housing units in low-income areas. The percentage of home refinance loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in moderate-income areas.

Small Loans to Businesses

Refer to Table 6 in appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Overall, the bank's geographic distribution for small loans to businesses during the 2014 to 2015 evaluation period is good.

The bank's geographic distribution of small loans to businesses from 2014 through 2015 in the Pittsburgh AA is good. The percentage of small loans to businesses in low-income geographies is near to the percentage of aggregate peer lending in low-income geographies. Dollar Bank's percentage of small loans to businesses in moderate-income geographies is somewhat lower than the percentage of aggregate peer lending in moderate-income geographies. The percentage of small loans to businesses in low-income geographies is near to the percentage of businesses located in low-income geographies and is somewhat lower than the percent of businesses located in moderate-income tracts.

The bank's geographic distribution of small loans to businesses during 2013 in the Pittsburgh AA is consistent with 2014 through 2015. The percentage of small loans to businesses in low-income geographies exceeds the percentage of aggregate peer lending in low-income geographies. The percentage of small loans to businesses in low-income geographies exceeds

the percent of businesses located in low-income tracts. Dollar Bank's percentage of small loans to businesses in moderate-income geographies is near to the percentage of aggregate peer lending in moderate-income geographies and is near to the percent of businesses located in moderate-income tracts.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed Dollar Bank's home mortgage and small business lending activity in the Pittsburgh AA over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level of the borrower is good. The distribution of home mortgage loans by income level of the borrower is good, and the distribution of small loans to businesses is adequate.

Home Mortgage Loans

Overall, the distribution of loans by income level for home mortgage loans is good from 2014 through 2015. Refer to Tables 8, 9, and 10 in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The bank's distribution of loans by income level of the borrower for home purchase loans is good.

The bank's borrower distribution for home purchase loans is good from 2014 through 2015. The percentage of home purchase loans to low-income borrowers is near to the percentage of aggregate peer lending to low-income borrowers in the AA. The percentage of home purchase loans to moderate-income borrowers is somewhat lower than the percentage of aggregate peer lending to moderate-income borrowers in the AA. The bank's home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA and the home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

The bank's borrower distribution for home purchase loans in 2013 was stronger than 2014 through 2015. The percentage of home purchase loans to low-income and moderate- income borrowers exceeds the percentage of aggregate peer lending levels. The percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA. The bank's percentage of home purchase loans to moderate-income families exceeds the percentage of moderate-income families in the AA.

Home Improvement Loans

The bank's distribution of loans by income level of the borrower for home improvement loans is adequate.

The bank's borrower distribution for home improvement loans is adequate from 2014 through 2015. The percentage of home improvement loans to low-income and moderate-income borrowers is somewhat lower than the percentage of aggregate peer lending to low-income and moderate-income borrowers in the AA. The bank's percentage of home improvement loans to low-income borrowers is lower than the percentage of low-income families in the AA and moderate-income borrowers is near to the percentage of moderate-income families in the AA.

The bank's borrower distribution for home improvement loans in 2013 is consistent with 2014 through 2015. The percentage of home improvement loans to low-income and moderate-income borrowers is near to the percentage of aggregate peer lending to low-income and moderate-income borrowers in the AA. The bank's percentage of home improvement loans to low-income borrowers is lower than the percentage of low-income families in the AA, and the percentage of home improvement loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA.

Home Refinance Loans

The bank's distribution of loans by income level of the borrower for home refinance loans is adequate.

The bank's borrower distribution for home refinance loans is adequate from 2014 through 2015. The percentage of home refinance loans to low-income and moderate-income borrowers is somewhat lower than the percentage of aggregate peer lending to low-income and moderate-income borrowers in the AA. The bank's percentage of home refinance loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The bank's percentage of home refinance loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families in the AA.

The bank's borrower distribution for home refinance loans in 2013 is consistent with 2014 through 2015. The percentage of home refinance loans to low-income borrowers is somewhat lower than the percentage of aggregate peer lending to low-income borrowers. The percentage of home refinance loans to moderate-income borrowers is near to the percentage of aggregate peer lending to moderate-income borrowers. The bank's percentage of home refinance loans to low-income borrowers is significantly lower than the percentage of low-income families. The bank's percentage of home refinance loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA.

Small Loans to Businesses

Overall, the distribution of the bank's small loans to businesses is adequate. Refer to Table 11 in appendix D for the data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of the bank's small loans to businesses originated is adequate from 2014 through 2015. The bank's lending to small businesses is somewhat lower than the percentage of peer aggregate lending for small businesses. Small loans to small businesses (businesses with revenue of \$1 million or less) represent 46.2 percent of all small loans made to businesses originated by the bank compared to 50.3 percent represented by the peer aggregate lending within the Pennsylvania AA. Distribution by size of the loans shows that 71.2 percent of loan originations are for \$100 thousand or less.

The distribution of the bank's small loans to businesses originated in 2013 is consistent with 2014 through 2015. The bank's lending to small businesses is somewhat lower than the percentage of peer aggregate lending for small businesses. Small loans to small businesses (businesses with revenue of \$1 million or less) represent 37.3 percent of all small loans made to businesses originated by Dollar Bank compared to 46.6 percent represented by the peer aggregate lending within the Pennsylvania assessment area. Distribution by size of the loans shows that 65.4 percent of loan originations are for \$100 thousand or less.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending in the Pittsburgh AA is good and has a positive impact on the Lending Test. During the evaluation period, the bank originated 19 community development loans totaling \$26.2 million, representing 3.17 percent of tier 1 capital. The originated loans supported such activities as affordable housing, workforce development, job creation, economic development, financial stability, and essential community services for low and moderate-income individuals and neighborhoods in the AA. Select CD loan examples include:

- A \$9 million loan to support the construction of a facility that will help to revitalize a low-income neighborhood in the city of Pittsburgh. The facility will help provide permanent job creation for area residents and serve as a catalyst for further economic development activity in the neighborhood.
- A \$2 million loan and a \$5.9 million loan to support the rehabilitation of a vacant former school building into a facility supporting workforce development; energy and sustainable technology; and job creation. The facility is located in a low-income neighborhood in the city of Pittsburgh.
- A \$2.5 million loan to a non-profit organization that provides a variety of social services to low and moderate-individuals. The loan proceeds were used for the acquisition of a building in the city of Pittsburgh that will allow the organization to consolidate several locations and grow existing programing.
- A \$1.5 million loan to finance working capital needs for a non-profit organization providing medical and social services to low-income persons with disabilities.

- A \$500 thousand loan to support a newly formed community development loan fund to provide needed capital investment in low and moderate-income communities in western Pennsylvania.
- A \$647 thousand loan to support the construction process for six affordable single family properties in a low-income neighborhood in the city of Pittsburgh.
- A \$250 thousand loan to support the construction of the only grocery store in a low-income neighborhood.

Product Innovation and Flexibility

The bank makes extensive use of flexible lending practices in order to serve AA credit needs and has a positive impact on the Lending Test. Dollar Bank participates in a number of state and federal programs targeted to low- and moderate-income residents in the AA that have challenges with their credit or do not have sufficient funds for a down payment. These include:

- A housing finance agency loan program offers mortgages at below-market rates to lowand moderate-income households, and provides grants for closing cost assistance to very low-income families. During the evaluation period, 112 mortgage loans, in the amount of \$10.3 million, were originated under this program.
- A home rehabilitation program is offered in partnership with the local redevelopment authority and includes a zero percent interest rate to help income eligible city of Pittsburgh homeowners improve their homes. The loan term can be spread over 20 years, making the payment as low as possible. Homeowners may borrow up to \$25 thousand for a single unit home and \$35 thousand for a two-unit home. Dollar Bank originated 47 loans totaling \$1.1 million during the evaluation period.
- A home improvement loan program offers a very low-interest rate to help low- and moderate-income city of Pittsburgh homeowners make permanent improvements to their homes. Three loans were originated during the evaluation period for a total of \$28 thousand.
- Dollar Bank's Rent-No-More Community Mortgage Program Down Payment Assistance allows income eligible borrowers to include closing costs in their mortgage financing, up to 100 percent of the value of the home. Private mortgage insurance is not required. During the evaluation period, 185 mortgage loans, in the amount of \$14.8 million, were originated under this program.
- The bank's Home Works Home Loan offers loans up to \$50 thousand with extended repayment terms to 180 months to help lower monthly payments. Equity limit is 125 percent and must be owner occupied. Dollar Bank originated 566 loans with a total amount of \$18 million during the evaluation period.
- Dollar Bank is a member of an agency in Cincinnati that is a participating member offering home grants. These home grants are available to low- to moderate-income (LMI) applicants throughout the Pittsburgh and Cleveland AAs. As a member of the home grant program, Dollar Bank, along with other members, are given access to an annual \$200 thousand allocation. These allocations are distributed on a first come, first serve basis. Each year, Dollar Bank prepares, and has ready, their first time homebuyers by the March 1st date. The only prerequisite is for the applicant(s) is to have saved \$500 and the successful LMI household recipient can receive a matching grant up to \$5 thousand. An additional requirement includes that the LMI homeowner must live in the house for 5

- years. Total grants for the evaluation period were \$124 thousand for the Pittsburgh AA and \$40 thousand in the state of PA.
- Dollar Bank is a participant in a county bond program which offers below-market rate home improvement loans to residents of Allegheny County using a Federal Housing Administration loan. A matching down payment assistance grant to income eligible borrowers on a first come, first serve basis is also available.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Pennsylvania is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Pittsburgh AA is excellent.

Refer to Table 14 in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Dollar Bank provided an excellent level of qualified investments and grants that were responsive to the community development needs of the AA. The institution makes extensive use of complex investments to support community development initiatives.

During the evaluation period, the bank provided 253 qualified investments and grants that totaled \$20.0 million in the Pittsburgh AA, and an additional two qualified investments totaling \$2.9 million in the Pittsburgh MSA. These include:

- Multi-year donations to more than 10 organizations to support scholarship opportunities
 for underserved youth in the city of Pittsburgh under the State of Pennsylvania's
 Education Improvement Tax Credit Program and the Opportunity Scholarship Tax Credit
 Program. Contributions to the various organizations range in amounts from \$5 thousand
 to \$25 thousand per year.
- A contribution in the amount of \$100 thousand a year for 6 years to a community development corporation under the Pennsylvania Neighborhood Partnership Program to support ongoing revitalization efforts in the Allentown neighborhood within the city of Pittsburgh.
- A contribution in the amount of \$2.5 thousand to support pharmacy services targeting low-income and underserved populations in the Hill District in the city of Pittsburgh. The pharmacy provides services to areas which have been without a pharmacy for more than 10 years.
- The bank made three new investments, in the amount of \$5.6 million, in Low Income Housing Tax Credits (LIHTC) projects during the evaluation period. These projects will provide 229 affordable housing units in low- and moderate-income geographies within the AA. The bank also retained 8 prior period LIHTC investments in the amount of \$12.6 million.
- The bank retained two prior period LIHTC investments in amounts totaling \$2.9 million that are outside the Pittsburgh AA area, but in the broader statewide or regional area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Pennsylvania is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Pittsburgh AA is excellent.

Retail Banking Services

Refer to Table 15 in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank offers retail-banking services that are readily accessible to individuals in various income levels and geographies throughout the AA. The bank currently has 38 full service branches in the AA. The bank operates four branches in low-income geographies and 2 branches in moderate income geographies. Dollar Bank has four branches in low-income geographies and two branches located in moderate-income geographies. The bank operates thirty-one branches in middle- and upper-income geographies. Additionally, the bank operates one branch in an unclassified census tract. The bank operates six standalone ATMs, one of which is located in a moderate-income geography. The bank opened one branch during the assessment period in a low-income geography. This branch includes extended operating hours through the week, excluding Mondays when it is closed, and operating hours on Saturday and Sunday.

Services do not vary in a way that inconveniences certain portions of the AA, particularly low-and moderate-income geographies and/or individuals. The bank operates 38 branches in the Pittsburgh AA. Banking hours and services are provided Monday through Friday at all branches. Branch hours generally range from 8:30AM to 5:00PM. The bank operates four branches with extended Thursday hours, one of which is located in a low-income geography. One branch, located in a low-income geography, is closed on Monday but open on Sunday. Additionally, this branch is open until 7:00PM each weekday and is open until 3:00pm on Saturdays and Sundays. There are 29 branches that have extended hours on Friday, which includes 4 of the 6 branches located in low- and moderate-income geographies. Additionally, there are 29 branches that offers Saturday hours, of which 2 are located in low- and moderate-income geographies. Saturday banking hours are generally available from 9:00AM until 2:00PM. There are 22 branches, of which 2 are located in low- and moderate-income geographies that offer drive-thru banking services, and 1 that offers Saturday drive-thru hours.

All branches offer a full range of traditional deposit and loan products. The bank's deposit products include basic personal and business checking accounts as well as a variety of loan products including mortgages for first-time homebuyers and reverse mortgages that serves a large senior population in the bank's market area. The bank offers a home improvement loan product targeted to low- and moderate-income borrowers as well as a secured credit card. The bank offers free checking accounts and a low-cost prepaid debit card. ATM services are available at all branch locations. The bank maintains a membership in an ATM network that provides customers with surcharge-free ATM access at over 55 thousand ATMs worldwide.

The bank also offers free online banking and online bill pay through their transactional Internet website and on-line banking services. Customers are provided with free touch-tone telephone banking. Additionally, the bank maintains transactional iOS, Android, and Blackberry smartphone applications.

Community Development Services

Dollar Bank is a leader in providing community development services in the Pittsburgh AA. Bank management and employees have spent a significant number of hours providing financial and technical expertise to 56 separate organizations that provide community services to low- and moderate-income individuals and families, support affordable housing, and promote economic development by supporting small businesses in the AA. Examples of activities and organizations served include:

- Dollar Bank's 'Mortgages for Mothers' and 'Mortgages for Men' are annual half-day workshops targeted to single parents to encourage home ownership. Dollar Bank provides onsite babysitting. Credit counselors are available to pull and review credit reports and help attendees establish implementation plans to improve their credit. Almost 1,500 individuals attended these workshops during the assessment period.
- Dollar Bank's 3-2-1 Match Program provides grants of up to \$3 thousand for qualified candidates who save up to \$1 thousand and participate in the bank's home ownership counseling and readiness programs.
- Dollar Bank provide business financing and credit workshops with a business resource center that provides a single point of contact for minority, women, veterans and other disadvantaged business owners seeking information to start, sustain and grow their business.
- The bank provides financial literacy workshops for low-income residents of the local county and city housing authorities.
- The bank provides credit and business banking workshops for a local organization that provides maximum opportunities for minority, women and disadvantaged businesses to participate in county contracts.
- Dollar Bank provides literacy workshop for homeless veterans through a local 501(c)(3) nonprofit organization dedicated to ending homelessness among veterans in the Pittsburgh region. This organization provides a variety of supportive services for the growing population of homeless veterans in the Pittsburgh area.
- Free financial literacy workshops for clients of an organization that provides group homes, emergency shelters, and transitional living centers housing, food, and overnight lodging for varying amounts of time to those in need.
- Financial literacy and budgeting workshops for inmates being released from prison through a private not-for-profit 501(c)(3) organization incorporated in 1976 providing alternative housing and community corrections services to former inmates within the assessment area.
- Homeownership training classes with an organization that supports economic development, community revitalization and affordable housing and home ownership opportunities.

•	Branch managers provided eight financial literacy workshops for high school students in schools that serve a predominantly low- and moderate-income population.			

State Rating

State of Ohio

CRA Rating for Ohio²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory The Service Test is rated: High Satisfactory

- The geographic distribution of home mortgage loans is excellent and small loans to businesses by income level of the geography is excellent;
- The borrower distribution of home mortgage loans by income level of the borrower is good and distribution of small loans to businesses is adequate.
- Community development lending in Ohio is adequate and has a positive impact on the Lending Test;
- Flexible loan programs have a positive impact on the lending performance;
- The bank has a good level of community development investments and donations and demonstrates a good responsiveness to identified credit needs within the Ohio assessment area; and,
- Accessibility to the bank's delivery systems in the state is good.

Description of Institution's Operations in Ohio

The Cleveland AA contains 578 geographies in the counties of Cuyahoga, Lake, and Lorain, which are located in the Cleveland, Ohio MSA 17460. Dollar Bank has 27 branch offices and 45 ATMs, 40 of which are deposit-taking ATMs and 2 that are stand-alone ATMs. There are 21 full-service branch offices in Cuyahoga County, 4 in Lake County and 2 in Lorain County. The Akron AA contains 135 geographies. Dollar Bank has two branch offices and three ATMs, two of which are deposit-taking ATMs. There have not been any branch openings, closings or relocations in the state of Ohio throughout the assessment period.

Dollar Bank had \$1.7 billion in deposits within the Cleveland and Akron AAs as of June 30, 2015. Institutions with a top five market share include KeyBank, PNC Bank, Firstmerit Bank, Citizens Bank, and Third Federal Savings and Loan Association of Cleveland. Dollar Bank held a 3.0 percent deposit market share and ranked 11th of 34 depository institutions doing business in the Cleveland AA. Institutions with a top three market share in the Cleveland AA include KeyBank, PNC Bank, and Citizens Bank. Within the Akron AA, Dollar Bank held a 0.95 percent deposit

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For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

market share as of June 30, 2015, ranked 14th of 21 depository institutions doing business in the Akron AA. Institutions with a top three market share in the AA include Firstmerit Bank, PNC Bank, and JP Morgan Chase.

Refer to the market profiles for the state of Ohio in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Ohio

The state of Ohio contains two assessment areas, the Cleveland AA and the Akron AA. The Cleveland AA received a full-scope review and the Akron AA received a limited scope review. We gave the Cleveland AA the most weight in arriving at conclusions, given the bank has a substantially greater branch presence in this AA. The Cleveland AA includes the counties of Lorain, Lake, and Cuyahoga in Ohio, which are all part of the Cleveland-Elyria Metropolitan Statistical Area, 17460. The Akron AA contains Summit County, which is part of the Akron Metropolitan Statistical Area, 10420.

The Cleveland AA 27 branch offices geography tract distribution includes nine in upper-income tracts, 11 in middle-income tracts, 4 in moderate-income tracts, and 3 in low-income tracts. The Akron AA has a full-service branch located in a middle-income geography tract, and a private banking office in an upper-income geography tract.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Ohio is rated "Outstanding." Based on the full-scope review, the bank's performance in the Cleveland AA is excellent. The level of community development lending is good and had a positive impact on the bank's performance and the overall Lending Test.

Lending Activity

Refer to Table 1a Lending Volume in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall lending activity in the state of Ohio is excellent, considering the strong competition for all types of loans in the bank's AAs. The bank's performance is excellent in originating home mortgage loans and performance is good in originating small business loans supports this conclusion when compared to its local competitors.

Dollar Bank's overall lending activity in the Cleveland AA is excellent. We evaluated the bank's lending performance for the period January 1, 2014 through December 31, 2015 using 2015 Peer Mortgage Data.

Based on FFIEC 2015 Peer Mortgage Data – US and PR, the bank achieved a 3.04 percent market share of home mortgage loans by count, ranking 9th. The bank achieved a 1.42 percent

market share of home purchase loans by count, ranking 17th. The bank achieved a 15.36 percent market share of home improvement loans by count, ranking 2nd, and achieved a 3.55 percent market share of home refinance loans by count, ranking 6th. The number of reporting lenders in the AA was 422, with the top thirty lenders holding a 74.86 percent market share for count.

Small business lending is highly competitive in the AA. Dollar Bank ranked competed with 105 total lenders for small business lending by count in 2015. The top five lenders control a majority of the market with a combined market share of 62.29 percent. Individual market shares of these banks ranged from 9.06 percent to 19.90 percent.

For loans to small businesses in 2015, based on FFIEC 2015 Peer Small Business Data – US and PR, Dollar Bank achieved a 0.49 percent market share by count, ranking 21st of the 105 reporting lenders in the Cleveland AA. The bank achieved a 0.63 percent market share of low-income tracts by count, ranking 21st, and 0.59 percent market share of moderate-income tracts by count, ranking 19th.

The Federal Deposit Insurance Corporation's Institutions Deposit Market Share Report, as of June 30, 2015, indicates 34 institutions operating within Cuyahoga, Lake, and Lorain County within the Cleveland AA. Dollar Bank ranks 11th with deposit market share in Cuyahoga, Lake, and Lorain County of 3.04 percent.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans by income level of the geography is excellent. The distribution of home mortgage loans is excellent, and the distribution of small loans to businesses is excellent.

Home Mortgage Loans

Overall, the geographic distribution for home mortgage loans is excellent. The geographic distribution is excellent from 2014 through 2015. Refer to Tables 2a, 3a, 4a and in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The bank's geographic distribution for home purchase loans is excellent.

The bank's geographic distribution of home purchase loans is excellent from 2014 through 2015. The percentage of home purchase loans made in low-income and moderate-income geographies exceeds the percentage of aggregate peer lending in both geographies. The bank's percentage of home purchase loans made in low-income geographies is somewhat lower than the percentage of owner-occupied housing units in low-income areas. The percentage of home purchase loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in moderate-income areas.

The bank's geographic distribution of home purchase loans in 2013 is consistent with 2014 through 2015. The percentage of home purchase loans made in low-income and moderate-income geographies exceeds the percentage of aggregate peer lending in both geographies. The percentage of home purchase loans made in low-income geographies is near to the percentage of owner-occupied housing units in low-income tracts; while in moderate-income geographies the percentage exceeds the percentage of owner-occupied housing units in moderate-income tracts.

Home Improvement Loans

The bank's geographic distribution for home improvement loans is good.

The bank's geographic distribution of home improvement loans is good from 2014 through 2015. The percentage of home improvement loans made in low-income geographies is near to the percentage of aggregate peer lending in low-income geographies. The percentage of home improvement loans made in moderate-income geographies is somewhat lower than the percentage of aggregate peer lending in moderate-income geographies. The bank's percentage of home improvement loans made in low-income geographies is near to the percentage of owner-occupied housing units in low-income areas. The bank's percentage of home improvement loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in moderate-income areas.

The bank's geographic distribution of home improvement loans in 2013 was stronger than 2014 through 2015. The bank's percentage of home improvement loans made in low-income and moderate-income geographies exceeds the percentage of aggregate peer lending in both geographies. The bank's percentage of home improvement loans made in low-income and moderate-income geographies exceeds the percentage of owner-occupied housing units in the AA.

Home Refinance Loans

The bank's geographic distribution for home refinance loans is excellent.

The bank's geographic distribution of home mortgage refinance loans is excellent from 2014 through 2015. The percentage of home refinance loans made in low-income geographies exceeds the percentage of aggregate peer lending in low-income geographies. The percentage of home refinance loans made in moderate-income geographies is near to the percentage of aggregate peer lending in moderate-income geographies. The bank's percentage of home refinance loans made in low-income and moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in low-income and moderate-income areas.

The bank's geographic distribution of home mortgage refinance loans in 2013 is consistent with 2014 through 2015. The percentage of home refinance loans made in low-income geographies is near to the percentage of aggregate peer lending in low-income geographies. The percentage of home refinance loans made in moderate-income geographies near to the percentage of aggregate peer lending in moderate-income geographies. The bank's percentage of home refinance loans made in low-income geographies is somewhat lower than the percentage of owner-occupied housing units in low-income areas. The percentage of home refinance loans in

moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in moderate-income areas.

Small Loans to Businesses

Refer to Table 6a in appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Overall, the bank's geographic distribution for small loans to businesses during the 2014 to 2015 evaluation period is excellent.

The bank's geographic distribution of small loans to businesses from 2014 through 2015 in the Cleveland AA is excellent. The percentage of small loans to businesses in low-income geographies exceeds the percentage of aggregate peer lending in low-income geographies. The percentage of small loans to businesses in low-income geographies exceeds the percent of businesses located in low-income tracts. Dollar Bank's percentage of small loans to businesses in moderate-income geographies exceeds the percentage of aggregate peer lending in moderate-income geographies and exceeds the percent of businesses located in moderate-income tracts.

The bank's geographic distribution of small loans to businesses during 2013 in the Cleveland AA is consistent with 2014 through 2015. The percentage of small loans to businesses in low-income geographies exceeds the percentage of aggregate peer lending in low-income geographies. The percentage of small loans to businesses in low-income geographies exceeds the percent of businesses located in low-income tracts. Dollar Bank's percentage of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses located in moderate-income geographies and is somewhat lower than the percent of businesses located in moderate-income tracts.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed Dollar Bank's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level of the borrower is excellent. The distribution of home mortgage loans by income level of the borrower is excellent, and the distribution of small loans to businesses is adequate.

Home Mortgage Loans

Overall, the distribution of loans by income level for home mortgage loans is excellent from 2014 through 2015. Refer to Tables 8a, 9a, and 10a in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The bank's distribution of loans by income level of the borrower for home purchase loans is excellent.

The bank's borrower distribution for home purchase loans is excellent from 2014 to 2015. The percentage of home purchase loans to low-income borrowers exceeds the percentage of aggregate peer lending to low-income borrowers in the AA. The percentage of aggregate peer lending to moderate-income borrowers in the AA. The bank's home purchase loans to low-income borrowers are somewhat lower than the percentage of low-income families in the AA; while the home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

The bank's borrower distribution for home purchase loans in 2013 is consistent with 2014 through 2015. The percentage of home purchase loans to low-income borrowers exceeds the percentage of aggregate peer lending levels. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of aggregate peer lending to moderate-income borrowers in the AA. The percentage of home purchase loans to low-income borrowers exceeds the percentage of low-income families in the AA. The bank's percentage of home purchase loans to moderate-income families exceeds the percentage of moderate-income families in the AA.

Home Improvement Loans

The bank's distribution of loans by income level of the borrower for home improvement loans is good.

The bank's borrower distribution for home improvement loans is good from 2014 through 2015. The percentage of home improvement loans to low-income borrowers is somewhat lower than the percentage of aggregate peer lending to low-income borrowers in the AA. The percentage of aggregate peer lending to moderate-income borrowers is near to the percentage of aggregate peer lending to moderate-income borrowers in the AA. The bank's percentage of home improvement loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA, and the percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

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Home Refinance Loans

The bank's distribution of loans by income level of the borrower for home refinance loans is good.

The bank's borrower distribution for home refinance loans is good from 2014 through 2015. The percentage of home refinance loans to low-income borrowers is near to the percentage of aggregate peer lending to low-income borrowers in the AA. The percentage of home refinance loans to moderate-income borrowers is near to the percentage of aggregate peer lending to moderate-income borrowers. The bank's percentage of home refinance loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The bank's percentage of home refinance loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA.

The bank's borrower distribution for home refinance loans in 2013 is consistent than 2014 through 2015. The percentage of home improvement loans to low-income borrowers is near to the percentage of aggregate peer lending to low-income borrowers in the AA. The percentage of aggregate peer lending to moderate-income borrowers is near to the percentage of aggregate peer lending to moderate-income borrowers in the AA. The bank's percentage of home refinance loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The bank's percentage of home refinance loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA.

Small Loans to Businesses

Refer to Table 11a in appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Overall, the bank's distribution of loans by income level of the borrower for small loans to businesses during the 2013 to 2015 evaluation period is adequate.

The distribution of the bank's small loans to businesses originated during 2014 through 2015 is adequate. The bank's lending to small businesses is somewhat lower than the percentage of peer aggregate lending for small businesses. Small loans to small businesses (businesses with revenue of \$1 million or less) represent 43 percent of all small loans made to businesses originated by Dollar Bank compared to 47 percent represented by the peer aggregate lending within the Cleveland AA. Distribution by size of the loans originated by the bank shows that 71 percent of business loan originations are for \$100 thousand or less.

The distribution of the bank's small loans to businesses originated during 2013 was stronger than 2014 through 2015. The bank's lending to small businesses exceeds the percentage of peer aggregate lending for small businesses. Small loans to small businesses (businesses with revenue of \$1 million or less) represent 44 percent of all small loans made to businesses originated by Dollar Bank compared to 43 percent represented by the peer aggregate lending within the Cleveland AA. Distribution by size of the loans originated by the bank shows that 71 percent of business loan originations are for \$100 thousand or less.

Community Development Lending

Refer to Table 1a Lending Volume in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5a includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5a does not separately list CD loans, however.

Community development lending in the Cleveland AA is adequate and has a positive impact on the Lending Test. During the evaluation period, the bank originated 3 community development loans totaling \$10.6 million, representing 1.28 percent of tier 1 capital. The originated loans supported activities including affordable housing, workforce development and job training skills for low and moderate-income individuals. Originated loans include:

- A \$9.5 million loan for the construction of a 61 unit multi-family development with retail space on the first floor. Of the 61 units, 49 will be low-income housing section 8 subsidized units.
- A \$1 million term loan to a non-profit organization for the purchase of a commercial building to be used for the new corporate headquarters. The organization provides education, training and work services primarily benefitting low and moderate-income individuals.
- The refinance of a \$100 thousand line of credit to a non-profit organization whose mission is to provide affordable housing services to low and moderate-income individuals and families.

Product Innovation and Flexibility

The bank makes use of flexible lending practices in order to serve AA credit needs. Dollar Bank participates in a number of state and federal programs targeted to low- and moderate-income residents in the AA that have challenges with their credit or insufficient funds for a down payment. The bank additionally has innovative practices to adjust to the needs of low- to moderate-income borrowers.

- An Ohio housing finance agency loan program offers mortgages at subsidized rates to low- and moderate-income families, and grants for closing cost assistance to very lowincome families. The bank originated 23 loans, totaling \$1.66 million, under this program during the review period.
- A Cleveland agency that supports a housing program in the city of Cleveland encourages revitalization by providing low interest rate loans to Cleveland residents through collaboration with local lenders. Loans are to improve properties and conduct necessary repairs to homes. The bank originated 15 loans, totaling \$150 thousand, under this program during the review period.
- Dollar Bank is a member of a Cincinnati agency that is a participating member of home grants. These home grants are available to LMI applicants throughout the Pittsburgh and Cleveland AAs. As a member of the home grant program, Dollar Bank, along with other members, are given access to an annual \$200 thousand allocation. These allocations are distributed on a first come, first serve basis. Each year, Dollar Bank prepares, and

has ready, their first time homebuyers by the March 1st date. The only prerequisite is for the applicant(s) is to have saved \$500 and the successful LMI household recipient can receive a matching grant up to \$5 thousand. An additional requirement includes that the LMI homeowner must live in the house for 5 years. Total grants for the evaluation period were \$129 thousand for the Cleveland AA and \$189 thousand for the state of Ohio.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Akron AA is not consistent with the bank's overall performance under the Lending Test in Ohio. Refer to Table 1a in the state of Ohio section of appendix D for the facts and data that support these conclusions.

• Dollar Bank made one community development loan for \$100 thousand during the evaluation period in the Akron AA. The loan supported a first time homebuyers program.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Ohio is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Cleveland AA is good.

Refer to Table 14a in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Dollar Bank provided a good level of qualified community development investments and grants that were responsive to the community development needs of the AA. During the review period, the bank provided 88 investments and grants totaling \$4.7 million that supported community development in the Cleveland AA. Of the total amount of investments, \$2.1 million was invested in two mortgage-backed security portfolios consisting of customized CRA targeted Federal National Mortgage Association securities. All of the loans in the pools are for properties in Cleveland County to borrowers with incomes less than 80 percent AMI. Dollar Bank also has an outstanding investment of \$2.3 million in a low-income housing tax credit project that provided 57 affordable housing units for low- and moderate- income families within the bank's AA. Examples of grants include:

- A contribution of \$25 thousand to an organization that supports community revitalization efforts in the Greater Cleveland area.
- A contribution of \$10 thousand to a nonprofit organization to support affordable housing development and related services throughout Cleveland.
- A contribution in the amount of \$2.5 thousand to a nonprofit to support educational and workforce opportunities, skills development, and access to career pathways for underserved youth.
- A contribution in the amount of \$10 thousand to an organization to help families secure homeownership opportunities and increase financial independence.

• A contribution in the amount of \$2.5 thousand to a nonprofit that provides interest free loans to refugees to help them settle and begin productive lives in this country.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the investment test in the Akron AA is weaker than the bank's overall performance in the state. Dollar Bank made no grants in the Akron AA during the evaluation period.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Ohio is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Cleveland MSA is good.

Retail Banking Services

Refer to Table 15a in the state of Ohio section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Delivery systems are readily accessible to essentially all portions of the institution's Cleveland AA. Services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies and/or individuals. The bank offers retail-banking services that are readily accessible to individuals in various income levels and geographies throughout the AA. The bank currently has 29 full service branches in the AA. The bank operates three branches in low-income geographies and 4 branches in moderate income geographies. Dollar Bank has three branches located in low-income geographies and four branches located in moderate-income geographies. The bank operates 22 branches in middle-and upper-income geographies. The bank operates two standalone ATMs, one of which is located in a moderate-income geography

Services do not vary in a way that inconveniences certain portions of the AA, particularly low-and moderate-income geographies and/or individuals. The bank operates 29 branches in the Cleveland AA. Banking hours and services are provided Monday through Friday at all branches. Branch hours generally range from 9:00AM to 5:00PM. The bank has 27 branches that have extended hours on Friday, which includes 6 of the 7 branches located in low- and moderate-income geographies. There are 25 branches that offer Saturday hours, of which 5 are located in low- and moderate-income geographies. Saturday banking hours are available from 9:00AM until 2:00PM. There are 24 branches, of which 5 are located in low- and moderate-income geographies that offer drive-thru banking services. Of those 24 branches, of which 4 are in a low- or moderate-income geography, Saturday drive-thru hours are offered.

All branches offer a full range of traditional deposit and loan products. The bank's deposit products include basic personal and business checking accounts as well as a variety of loan products including mortgages for first-time homebuyers and reverse mortgages that serves a large senior population in the bank's market area. The bank offers a Home Improvement loan

product targeted to low- and moderate-income borrowers as well as a secured credit card. The bank offers free checking accounts and a low-cost prepaid debit card. Automated teller machine (ATM) services are available at all branch locations. The bank maintains a membership in an ATM network that provides customers with surcharge free ATM access at over 55 thousand ATMs worldwide.

The bank also offers free online banking and online bill pay through their transactional Internet website and on-line banking services. Customers are provided with one free use of telephone banking per month. Additionally, the bank maintains transactional iOS, Android, and Blackberry smartphone applications.

Dollar Bank did not open or close any branches in the Cleveland AA during the evaluation period.

Community Development Services

Dollar Bank provides a relatively high level of community development services in the Cleveland AA. Bank management and employees have spent a significant number of hours providing financial and technical expertise to 21 separate organizations that provide community services to low- and moderate-income individuals and families, support affordable housing, and promote economic development by supporting small businesses in the AA. Examples of activities and organization served include:

- 'Mortgages for Mothers' is an annual half-day workshop targeted to single parents to encourage home ownership. Dollar Bank provides onsite babysitting. Credit counselors are available to pull and review credit reports and help attendees establish implementation plans to improve their credit. Over seven hundred individuals attended the workshops during the assessment period.
- Two branch officers provided financial literacy classes for an organization whose mission is to empower individuals to achieve and maintain self-sufficiency through employment. Since 1976, the organization has helped more than 120 thousand low-income and disadvantaged adults in greater Cleveland prepare for jobs, get jobs, keep jobs and move up the career ladder.
- A branch officer provided workforce development and credit workshop services to a nonprofit organization focused on matching qualified candidates to companies looking for diversity in their organization. This organization's training and intensive case management services prepare individuals to enter the workforce ready and motivated. Services are provided to both the individuals seeking training and employment opportunities and the employers who understand that economic development is directly linked to employment.
- A branch officer provided financial literacy services to LMI women in conjunction with a nonprofit organization that provides an array of services geared at preparing women and children for positive, productive futures and providing a bridge from crisis to stability and self-sufficiency.
- Multiple bank officers partnered with a local hospital to provide a program to encourage low- and moderate-income families to live in a more health conscious way by providing tools, resources and education that will not only improve their physical health, but increase their financial awareness.

 Dollar Bank employees taught 10 financial literacy workshops in four different schools in the Cleveland AA during the evaluation period. The workshops targeted high school students from low- and moderate-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the service test in the Akron AA is weaker than the bank's overall performance in the state of Ohio.

 Two assistant vice presidents provided a homebuyer workshop for LMI individuals with a nonprofit organized to strengthen communities by providing quality housing and practical homeownership opportunities, increasing financial independence, empowering citizen involvement, and revitalizing communities.

Appendix A: Scope of Examination

The following table identifies the time period covered in this performance evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term "full-scope") and those that received a less comprehensive review (designated by the term "limited-scope").

Time Period Reviewed	Lending Test (exclude Investment, Service Te CD Loans: 07/30/2013						
Financial Institution		Products Reviewed					
Dollar Bank, F.S.B. Pittsburgh, PA		Home Purchase; Home Improvement; Home Refinance; Small Business; Community Development loans; Qualified Investments; Services					
Affiliate(s)	Affiliate Relationship	Products Reviewed					
NA							
List of Assessment Areas and Ty	pe of Examination						
Assessment Area	Type of Exam	Other Information					
Pennsylvania							
Pittsburgh MSA	Full-Scope Review	Portion of MSA: Allegheny County, Butler County, Washington County, and Westmoreland County					
Ohio							
Cleveland MSA	Full-Scope Review	Portion of MSA: Cuyahoga County, Lake County, Lorain County					
Akron MSA	Limited-Scope Review	Portion of MSA: Summit County					

Appendix B: Summary of State Ratings

Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating
Dollar Bank	High Satisfactory	Outstanding	Outstanding
Pennsylvania	High Satisfactory	Outstanding	Outstanding
Ohio	Outstanding	High Satisfactory	High Satisfactory

^(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

Pittsburgh AA

Demographic Information for	Full Scope Area: D	ollar Pgh AA	. 2015			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	605	7.27	21.49	45.62	23.31	2.31
Population by Geography	1,980,199	4.52	16.44	48.30	30.26	0.48
Owner-Occupied Housing by Geography	586,826	2.32	14.48	51.14	32.05	0.01
Business by Geography	156,116	4.39	12.54	47.77	34.67	0.63
Farms by Geography	3,639	1.43	9.04	60.84	28.61	0.08
Family Distribution by Income Level	514,507	19.19	17.45	21.58	41.78	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	188,505	7.12	25.63	50.32	16.94	0.00
Median Family Income FFIEC Adjusted Median Family Households Below Poverty Lev		62,376 69,700 12%	Median Housin Unemployment US Census)		128,797 5.0%	

^(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

The Pittsburgh AA contains 605 geographies in the counties of Allegheny, Butler, Washington and Westmoreland, which are located in the Pittsburgh, PA MSA 38300. Dollar Bank has 38 branch offices in the Pittsburgh AA. Allegheny County has 30 full-service branches, plus deposit taking windows and ATMs at 2 senior citizen complexes. The bank also has 2 full-service branch offices in Butler County, 2 branch offices in Washington County, and 4 branch offices in Westmoreland County. During the evaluation period, Dollar Bank opened 1 new branch office in Allegheny County, and the bank had one that was relocated. Dollar Bank has 82 ATM machines in the Pittsburgh AA, of which 67 are deposit-taking, 27 drive thru ATMs and 7 are stand-alone ATM facilities. As of June 30, 2015, Dollar Bank held a 3.5 percent deposit market share and ranked sixth of 46 depository institutions doing business in the Pittsburgh AA. The top three institutions by deposit share are PNC Bank, Bank of New York Mellon, and Citizens Bank.

According to the 2010 U.S. Census, the total population increased to 1.98 million, and the distribution of families by income level was 19.19 percent low-income, 17.45 percent middle-income, 21.58 percent middle-income, and 41.78 percent upper-income.

Employment and Economic Factors

We reviewed data from Selected Economic Characteristics from the 2015 American Community Survey 1-year estimates related to unemployment and rates of poverty among families in the AA. Unemployment rates in the counties that make-up the Pittsburgh AA were 5.6 percent, 4.4 percent, 6.3 percent, and 4.6 percent for Allegheny, Butler, Washington, and Westmoreland

respectively, compared to 6.3 percent for the state of Pennsylvania and a nationwide rate of 6.3 percent. The four major employers in the AA are UPMC, University of Pittsburgh, Giant Eagle, Inc. and PNC Financial Inc. Rates of poverty among families in Allegheny, Butler, Washington, and Westmoreland counties were 7.5 percent, 7.5 percent, 6.8 percent, and 7.6 percent respectively compared to 9.1 percent in Pennsylvania and a nationwide rate of 10.6 percent.

Housing

There are some opportunities for residential mortgage lending in the Pittsburgh AA's LMI geographies. However, the number of housing units is much lower in LMI geographies than middle- and upper-income geographies resulting in limited opportunities given the competition in the market.

According to the 2010 U.S. Census, 63.3 percent of the total housing units in the AA were owner-occupied. LMI geographies are primarily rental markets, with rental units accounting for 47.6 percent of the housing units in low-income geographies and 35.7 percent of the housing units in moderate-income geographies.

Home ownership in LMI geographies is difficult due to moderate median housing prices compared to median family incomes, and a poverty rate of 7.4 percent in the AA. According to American Fact Finder, the median housing value for the AA was \$149.7 thousand at year-end 2015. Median home prices are relatively high in the AA when coupled with a median family income of \$69.7 thousand and a poverty rate of 7.4 percent (according to 2015 American Fact Finder). Based on this median family income, LMI families earned at most approximately \$34.8 thousand and \$55.8 thousand, respectively. These income levels would make it difficult to afford owner-occupied housing in this AA for LMI borrowers.

The median age of housing stock is higher in LMI geographies than middle- and upper-income geographies, contributing to the lower median housing values in LMI geographies. Older housing typically has lower purchase prices, but often cost more to maintain. Per the 2010 U.S. Census, the median age of housing in low-income geographies was 63 years, and 65 years for moderate-income geographies. Due to the older age of housing stock in LMI geographies, we would expect increased demand for home improvement lending. However, this is partially mitigated by the overall low number of housing units in LMI geographies.

Community Contact

OCC Examiners and other agencies held a multi-organization listening session on July 21, 2016. Contacts with organizations focused on the following general banking/credit needs and opportunities for participation by local financial institutions:

- Housing affordability/rent burden, affordable housing development and/or rehabilitation identified needs related primarily to housing.
- A need for financial counseling/education on the front-end and also throughout the life cycle of homeownership.
- Challenges with access to adequate banking services in LMI communities in general including access to online banking.
- A need for more SBA lending and investments in community development financial institution funds.

- Many small businesses have difficulty accessing credit and banks do not support small dollar loans.
- A need for pre-development financing for planned commercial and retail development projects to help revitalize targeted low- and moderate-income areas.

Contacts acknowledged Dollar Bank is a strong player in community development, filling a void as other financial institutions become less involved. Dollar Bank was noted as having worked to develop residential property in low- and moderate-income areas, servicing home improvement loans for low- and moderate-income borrowers, and providing community education. Dollar Bank continues to provide LMI lending that other banks will not. The contacts noted that Dollar Bank has an appropriate staff model and has the sensitivity needed to improve financial literacy to LMI individuals.

State of Ohio

Cleveland AA, Part of Cleveland-Elyria MSA

Demographic Infor	mation for Fu	ıll-Scope A	rea: Cleve	land AA 2	2015	
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	578	17.99%	23.18%	34.78 %	23.18%	0.87%
Population by Geography	1,811,519	11.90%	19.83%	37.99 %	30.27%	0.01%
Owner-Occupied Housing by Geography	493,592	6.63%	16.00%	42.12 %	35.25%	0.01%
Businesses by Geography	119,976	8.72%	14.93%	38.27 %	37.66%	0.43%
Farms by Geography	2,559	3.67%	10.90%	44.16 %	41.23%	0.04%
Family Distribution by Income Level	461,447	23.30%	17.74%	20.42 %	38.54%	0.00%
Distribution of Low- and Moderate- Income Families throughout AA Geographies	189,367	21.45%	28.00%	35.47 %	15.07%	0.01%
Median Family Income HUD Adjusted Median Family Income for 2015 Households Below the Poverty Level	\$62,627 \$66,100 14%		ousing Value /ment Rate			\$144,733 9.12%

^(*) The NA category consists of geographies that have not been assigned an income classification. Source: 2010 U.S. Census, and 2015 HUD updated MFI.

The state of Ohio contains two assessment areas, the Cleveland AA and the Akron AA. The Cleveland AA received a full-scope review and the Akron AA received a limited scope review. We gave conclusions in the Cleveland AA the most weight in arriving at conclusions given the bank has a substantially greater branch presence in this AA. The Cleveland AA includes the counties of Lorain, Lake, and Cuyahoga in Ohio, which are all part of the Cleveland-Elyria Metropolitan Statistical Area, 17460. The Akron AA contains Summit County, which is part of the Akron Metropolitan Statistical Area, 10420.

The Cleveland AA contains 578 geographies. Dollar Bank has 27 branch offices and 45 ATMs, 40 of which are deposit-taking ATMs and 2 that are stand-alone ATMs. There are 21 full-service branch offices in Cuyahoga County, 4 in Lake County and 2 in Lorain County. Branch geography tract distribution includes nine in upper-income tracts, 11 in middle-income tracts, 4 in moderate-income tracts, and 3 in low-income tracts. The Akron AA contains 135 geographies. Dollar Bank has two branch offices and 3 ATMs, 2 of which are deposit-taking ATMs. There are two full-service branch offices in Summit County. A full-service branch office located in a middle-income geography tract, and a private banking office in an upper-income geography tract. As of June 30, 2015, Dollar Bank held a 3.0 percent deposit market share and ranked 11th of 34 depository institutions doing business in the Cleveland AA. The top three institutions in the Cleveland AA by deposit share are KeyBank, PNC Bank, and Citizens Bank.

According to the 2010 U.S. Census, the total population increased to 1.8 million, and the distribution of families by income level was 23.3 percent low-income, 17.7 percent middle-income, 20.4 percent middle-income, and 38.5 percent upper-income.

Employment and Economic Factors

We reviewed data from Selected Economic Characteristics from the 2015 American Community Survey 1-year estimates related to unemployment and rates of poverty among families in the AA. Unemployment rates in the counties that make-up the Cleveland AA were 9.3 percent, 3.6 percent, and 7.3 percent for Cuyahoga, Lake, and Lorain Counties, respectively, compared to 6.4 percent for the state of Ohio and a nationwide rate of 6.3 percent. Unemployment for the entire Cleveland AA is 9.1 percent based on 2015 American Community Survey 1-year estimates. The five major employers in the Cleveland AA are the Cleveland Clinic Foundation, University Hospitals, Progressive Corp, Giant Eagle, Inc., and General Motors Corp. Rates of poverty among families in Cuyahoga, Lake, and Lorain counties were 13.9 percent, 4.7 percent, and 10.2 percent respectively compared to 10.7 percent in Ohio and a nationwide rate of 10.6 percent.

Housing

There are limited opportunities for residential mortgage lending in this AA's LMI geographies due to a low number of units, lower rate of owner occupancy, high unemployment, and a high poverty rate. The number of housing units is much lower in LMI geographies than middle- and upper-income geographies.

Home ownership in LMI geographies is difficult due to high median housing prices compared to median family incomes, and a poverty rate of 14.00 percent in the AA. According to the American Fact Finder, the median housing value estimate was \$122 thousand in Cuyahoga County, \$148 thousand in Lake County, and \$137 thousand in Lorain County in 2015. The median housing value estimates were \$123 thousand, \$148 thousand, and \$138 thousand in Cuyahoga, Lake, and Lorain Counties respectively in 2014, and \$126 thousand, \$151 thousand, and \$141 thousand in 2013. Median home prices are relatively high in the AA when coupled with a median family income of \$63 thousand and a poverty rate of 14.00 percent (according to 2010 U.S. Census). Based on this median family income, LMI families earned at most approximately \$31 thousand and \$50 thousand, respectively. These income levels would make it difficult to afford owner-occupied housing in this AA for LMI borrowers.

There were no significant shifts in the housing mix indicated by the 2010 U.S. Census. Owner-occupied housing increased slightly to 58.2 percent, while rental occupied units decreased to 29.9 percent; vacant units increased to 11.9 percent. The majority of housing units in LMI geographies remained rental units, totaling 47.3 percent in low-income geographies, and 41.5 percent in moderate-income geographies.

The median age of housing stock is higher in LMI geographies than middle- and upper-income geographies, contributing to the lower median housing values in LMI geographies. Older housing typically has lower purchase prices, but often cost more to maintain. Per the 2010 U.S. Census, the median age of housing in low-income geographies was 66 years, and 60 years for moderate-income geographies. Due to the older age of housing stock in LMI geographies, we

would expect increased demand for home improvement lending. However, this is partially mitigated by the overall low number of housing units in LMI geographies.

Community Contact

Three community contacts were interviewed in 2015. One contact is an affordable housing provider in Northeast Ohio, assisting low- to moderate-income individuals and families in receiving access to down payment assistance and providing technical assistance. Another organization assists low- to moderate-income borrowers in the Cleveland area with any complaints they may have regarding possible fraudulent, unfair, deceptive, and unconscionable business practices related to the Community Reinvestment Act, Fair Housing Codes, and Cleveland Consumer Protection Code. A third contact focuses on economic revitalization of the North and South Broadway neighborhoods of Cleveland by rehabilitating existing storefronts and homes as well as building new ones. Contacts indicated community needs included rehabilitation loans for revitalization, small business loans, construction lending, financial literacy education for low- to moderate-income homeowners, and a stronger branch presence in low- to moderate-income communities. One community contact notes that Dollar Bank primarily focuses on small business lending in the MSA but does a "very good" job at residential lending in the area.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- **Table 1.** Lending Volume Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank's assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) 5 and 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- **Table 1.** Other Products Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- **Table 2. Geographic Distribution of Home Purchase Loans** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- **Table 3.** Geographic Distribution of Home Improvement Loans See Table 2.
- **Table 4. Geographic Distribution of Home Mortgage Refinance Loans** See Table 2.
- **Table 5. Geographic Distribution of Multifamily Loans** Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage

distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- **Table 6. Geographic Distribution of Small Loans to Businesses** The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- **Table 7. Geographic Distribution of Small Loans to Farms** The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- **Table 8. Borrower Distribution of Home Purchase Loans** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- **Table 9.** Borrower Distribution of Home Improvement Loans See Table 8.
- **Table 10. Borrower Distribution of Refinance Loans** See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.
- **Table 14. Qualified Investments** Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As ___.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Pennsylvania

Table 1. Lending Volume

LENDING VOLUME			Geo	graphy: STA	ΓE OF PENNS	YLVANIA	Evaluati	ion Period: JA	ANUARY 1, 20	14 TO DECI	EMBER 31, 20	015
	Home	Mortgage	Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Rep	% of Rated Area Deposits in MA/AA***		
Assessment Area (2015):	MA/AA*	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Dollar Pgh AA 2015	100.00	8,861	1,149,191	671	82,991	0	0	19	26,200	9551	1,258,382	100.00

^{*} Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 30, 2013 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HO	OME PURCH	HASE		Ge	eography: ST	ATE OF PEN	NSYLVANI	ÍΑ	Evaluation l	Period: JANU	JARY 1, 2014 TO DECEMBER 31, 2015				
	Total Hom	e Purchase		ncome aphies		e-Income	Middle-Income		Upper-Income		Aggreg		A Lending ((%) by	
	Loans				Geogr	aphies	Geogr	aphies	Geogr	aphies		Tract In	Income*		
		% Owner	% BANK	% Owner	% BANK	% Owner	% BANK	% Owner	% BANK						
		Total**		Loans****	Occ	Loans	Occ	Loans	Occ	Loans	Low	Mod	Mid	Upp	
			Units***		Units***		Units***		Units***						
Full Review:		•	•			•	•	•				•	•		
Dollar Pgh AA 2015	2,088	100.00	2.32	1.63	14.48	9.05	51.14	42.19	32.05	47.13	1.18	9.94	45.83	43.06	

^{*} Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution:	HOME IMI	PROVEM	ENT		Geogr	aphy: STATE	E OF PENNS	YLVANIA	Evalua	tion Period: J	JANUARY 1	1, 2014 TO I	DECEMBER	R 31, 2015
Assessment Area:						e-Income aphies	Middle-Income Geographies		Upper-Income Geographies		Aggrega	ite HMDA L Inco		by Tract
			% Owner Occ Units***	% BANK Loans	% Owner % BANK Occ Loans Units***		% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp		
Full Review:														
Dollar Pgh AA 2015	2,969	100.00	2.32	2.26	14.48	10.44	51.14	42.78	32.05	44.53	2.43	12.72	51.69	33.16

^{*} Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution:	НОМЕ МО	RTGAGE	REFINANCI	Ξ	Ge	eography: STA	ATE OF PENI	NSYLVANIA	Evaluatio	on Period: JAl	NUARY 1,	2014 TO D	ECEMBER	31, 2015
Assessment Area:	Total Mort Refinanc	C C				oderate-Income Middle- Geographies Geogra				Income raphies	Aggregat	te HMDA L Inco		by Tract
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Dollar Pgh AA 2015	3,770	100.00	2.32	0.98	14.48	7.80	51.14	43.66	32.05	47.56	1.03	8.72	46.86	43.39

^{*} Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution	n: MULTIFAM	ILY		C	Geography:	STATE OF P	ENNSYLVA	NIA	Evaluatio	on Period: JA	NUARY 1,	2014 TO D	ECEMBER	31, 2015
	Total Mult Loan	•	Low-Ind Geograp				Middle-Income Geographies		Upper-Income Geographies		Aggregat	by Tract		
Assessment Area:	#	% of Total**	% of MF Units***	% BANK Loans* ***	% MF Units** *	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Dollar Pgh AA 2015	31	100.00	9.16	29.03	20.14	19.35	44.77	19.35	25.94	32.26	9.83	29.49	35.04	25.64

^{*} Based on 2015 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: S	SMALL LOANS	TO BUSI	NESSES		Geograph	y: STATE	OF PENNSY	LVANIA	Evaluation Per	iod: JANU	ARY 1, 20	14 TO DE	CEMBER	31, 2015	
	Total Small Loans		Low-It Geogra	ncome aphies	Moderate-Ir Geograph		Middle-Income Geographies		Upper-Income Geographies		Aggre	gate Lendi Inco	ing (%) by Tract me*		
Assessment Area:	# % of % of % Total** Business BANK Loans		% of Businesses**	% BANK Loans	% of Businesse s***	% BANK Loans	% of Businesses* **	% BANK Loans	Low	Mod	Mid	Upp			
Full Review:															
Dollar Pgh AA 2015	662	100.00	4.39	3.63	12.54	8.46	47.77	43.96	34.67	43.96	4.25	12.80	47.20	35.76	

^{*} Based on 2015 Peer Small Business Data -- US and PR
** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution:	HOME PURCHA	ASE		(Geography: ST	ATE OF PEN	INSYLVANI	A	Evaluatio	on Period: JA	NUARY 1,	2014 TO D	ECEMBER	31, 2015
	Total Home P			Income	Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		A	ggregate Le	ending Data	*
Assessment Area:	#	% of Total**	Borrowers % % BANK Familie Loans*** ****		% BANK Loans***		% Families* **	% BANK Loans***	% Families*	% BANK Loans***	Low	Mod	Mid	Upp
Full Review:														
Dollar Pgh AA 2015	2,089	100.00	19.19	7.33	17.45	19.96	21.58	22.07	41.78	50.64	8.79	23.19	24.09	43.93

^{*} Based on 2015 Peer Mortgage Data -- US and PR ** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.6% of loans originated and purchased by BANK.

3 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution:	HOME IMPRO	OVEMEN'	Γ		Geograp	hy: STATE C	F PENNSYL	VANIA	Evaluatio	on Period: JA	NUARY 1,	2014 TO D	ECEMBER	31, 2015
	Total Home Low-Income Improvement Loans Borrowers # % of % % RAN						Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending l			*
Assessment Area:	*		% Families 4	% BANK Loans***	% Families* **	% BANK Loans***	% Families* **	% BANK Loans***	Low Mod		Mid	Upp		
Full Review:														
Dollar Pgh AA 2015	2,971	100.00	19.19	6.98	17.45	15.15	21.58	21.29	41.78	56.58	11.43	19.57	22.70	46.30

^{*} Based on 2015 Peer Mortgage Data -- US and PR
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{****} Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by BANK.
4 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution	n: HOME MOR	ГGAGE R	EFINANCE		Ge	eography: STA	ATE OF PENI	NSYLVANIA	Evaluatio	on Period: JA	NUARY 1,	2014 TO D	ECEMBER	31, 2015
	Total Home Mortgage Low-Income Borrowe Refinance Loans						Middle- Borro	Income owers		Income owers	A	ggregate L	ending Data	*
Assessment Area:	sessment Area: # % of % BANK Total* Families Loans****						% Families* **	% BANK Loans***	% Families* **	% BANK Loans***	Low	Mod	Mid	Upp
Full Review:														
Dollar Pgh AA 2015	3,770	100.00	19.19	3.78	17.45	13.96	21.58	23.54	41.78	58.72	7.19	17.22	24.13	51.46

^{*} Based on 2015 Peer Mortgage Data -- US and PR ** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by BANK.

5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SM	ALL LOANS T	O BUSINESSES		Geography: ST	ATE OF PENNSYL	VANIA Evaluat	ion Period: JANUA	RY 1, 2014 TO DE	CEMBER 31, 2015
		ll Loans to nesses	Businesses With million		Loans by Origina	Amount Regardless	s of Business Size	Aggregate L	ending Data*
Assessment Area:	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Dollar Pgh AA 2015	671	100.00	77.45	46.20	71.24	13.26	15.50	35,859	18,050

^{*} Based on 2015 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).
**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 15.35% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTME	NTS		Geography: S	STATE OF PENNSY	LVANIA	Evaluation Perio	od: JANUARY 1,	2014 TO DECE	MBER 31, 2015
	Prior Perio	od Investments*	Current Peri	od Investments		Total Investments		Unfunded C	ommitments**
Assessment Area:	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Dollar Pgh AA 2015	8	\$12,551	245	\$7,448	253	\$20,000	0.75	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BR DECEMBER 31, 2015	ANCH DEL	IVERY SY	STEM AN	D BRANG	CH OPEN	NINGS/CI	OSINGS	Geog	graphy: STA	ATE OF P	ENNSYL	VANIA	Evaluatio	n Period:	JANUAR	Y 1, 2014	ТО
	Deposit s			Branc	hes				Bran	ch Openi	ngs/Closin	ıgs			Popu	lation	
Assessment Area:	% of Rated	# of BANK	% of Rated			Branches ographies		# of	# of	Net cha	-	cation of B or -)	ranches	% o	f Population Geog	on within I raphy	Each
	Area Deposit s in AA	Branch es	Area Branch es in	Low	Mod	Mid	Upp	Branch Openin gs	Branch Closing s	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:			AA														
Dollar Pgh AA 2015	100.00	38	100.00	10.53	5.26	47.37	36.84	1	1	0	0	0	0	4.52	16.44	48.30	30.26

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM Geography: STATE OF PENNSYLVANIA **Evaluation Period**: JANUARY 1, 2014 TO DECEMBER 31, 2015

	Deposits			Branch	hes					ATM	1 s				Popu	lation	
Assessment Area:	% of Total Bank	# of BANK	% of Total		cation of me of Ge			# of Bank	# of Total	Locati	on of ATN Geograp		ome of	% of		on within E raphy	Each
	Deposits Branch es Branch			ATMs	Bank ATMs	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp				
Full Review:			CS														
Dollar Pgh AA 2015	100.00	38	57.58	10.53	5.26	47.37	36.84	82	127	3.66	7.32	46.34	37.80	4.52	16.44	48.30	30.26

Ohio

Table 1a. Lending Volume

LENDING VOLUME			Geogr	aphy: STATE	E OF OHIO		Evaluation P	eriod: JANU	ARY 1, 2014 TO) DECEMBE	R 31, 2015	
	% of Rated Area Loans (#) in	Home	Mortgage		Loans to	Small Loa	ns to Farms	-	Development ns**	Total Repo	orted Loans	% of Rated Area Deposits in
Assessment Area (2015):	MA/AA*	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	MA/AA***
Full Review:												
Dollar Clev AA 2015	90.24	2,360	246,062	303	33,396	0	0	3	10,600	2666	290,058	100.00
Limited Review:												
Dollar Akron AA 2015	9.76	263	32,513	25	5,472	0	0	0	0	288	37,985	0.00

^{*} Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 30, 2013 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: H	OME PURCI	HASE		Ge	eography: ST	ATE OF OH	Ю	Evalua	ntion Period:	JANUARY	1, 2014 TO	DECEMB	ER 31, 201	.5
		e Purchase ans		ncome aphies		e-Income aphies		-Income raphies		Income aphies	Aggre	gate HMDA Tract In	A Lending (come*	(%) by
Assessment Area:	#	% of Total**	% Owner Occ Units**	% BANK Loans** **	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Dollar Clev AA 2015	653	86.72	6.63	3.52	16.00	16.69	42.13	42.88	35.25	36.91	2.67	11.59	43.20	42.55
Limited Review:														
Dollar Akron AA 2015	100	13.28	5.85	16.00	20.38	19.00	36.14	25.00	37.63	40.00	2.47	14.98	36.84	45.72

^{*} Based on 2015 Peer Mortgage Data -- US and PR

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution:	HOME IMI	PROVEM	ENT		Geogr	aphy: STATE	E OF OHIO		Evaluation	Period: JAN	UARY 1, 20	014 TO DEC	EMBER 31	, 2015
Assessment Area:	Total I Improv Loa	ement	Low-I Geogr	ncome aphies		e-Income aphies		-Income aphies		Income raphies	Aggrega	te HMDA L Incor		by Tract
			% BANK Loans** **	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp	
Full Review:	•									•				
Dollar Clev AA 2015	699	90.66	6.63	4.58	16.00	12.16	42.13	41.49	35.25	41.77	5.20	16.46	38.60	39.74
Limited Review:	•				•	•	•	•	•			•	•	
Dollar Akron AA 2015	72	9.34	5.85	4.17	20.38	11.11	36.14	25.00	37.63	59.72	5.62	17.89	33.22	43.27

^{*} Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: 1	HOME MO	ORTGAGE	REFINANC	Е	Ge	ography: STA	ATE OF OHIO	O	Evaluation	Period: JANU	J ARY 1, 20	14 TO DEC	EMBER 31	, 2015
Assessment Area:						e-Income aphies		-Income raphies		Income raphies	Aggregat	te HMDA L Incoi		by Tract
	#	% of Total* *	% Owner Occ Units***	% BANK Loans** **	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Dollar Clev AA 2015	995	91.62	6.63	2.71	16.00	9.55	42.13	36.28	35.25	51.46	2.34	10.27	39.87	47.52
Limited Review:														
Dollar Akron AA 2015	91	8.38	5.85	0.00	20.38	5.49	36.14	27.47	37.63	67.03	2.65	12.98	36.43	47.93

^{*} Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution	ı: MULTIFAMI	LY		C	Geography:	STATE OF O	НЮ	Evalı	ation Period	: JANUARY	1, 2014 TO	DECEMBI	ER 31, 2015	i
	Total Multi Loans	,	Low-Ind Geogra			te-Income raphies		-Income raphies	1 1	Income raphies	Aggregat	te HMDA L Incor		by Tract
Assessment Area:	#	% of Total**	% of MF Units***	% BANK Loans* ***	% MF Units** *	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Dollar Clev AA 2015	13	100.00	15.77	38.46	28.46	30.77	37.62	15.38	18.14	15.38	14.20	26.04	43.79	15.98
Limited Review:		•						•					•	
Dollar Akron AA 2015	0	0.00	16.03	0.00	22.64	0.00	35.68	0.00	25.65	0.00	17.24	20.69	29.31	32.76

^{*} Based on 2015 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: S	SMALL LOANS	TO BUSI	NESSES		Geograph	y: STATE	OF OHIO	E	valuation Perio	d: JANUA	RY 1, 2014	4 TO DEC	EMBER 3	1, 2015
	Total Small Loans		Low-Ii Geogra		Moderate-Iı Geograpl		Middle-l Geogra		Upper-Ine Geograp		Aggre	gate Lendi Inco	ing (%) by me*	Tract
Assessment Area:	#	% of Total* *	% of Business es***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesse s***	% BANK Loans	% of Businesses* **	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Dollar Clev AA 2015	303	92.38	8.72	10.23	14.93	15.84	38.27	37.95	37.66	35.97	7.99	13.48	37.73	40.80
Limited Review:	•	•							•			•	•	
Dollar Akron AA 2015	25	7.62	8.97	0.00	17.11	4.00	30.46	20.00	43.46	76.00	6.69	15.93	30.48	46.90

^{*} Based on 2015 Peer Small Business Data -- US and PR
** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
*** Source Data - Dun and Bradstreet (2015).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution:	HOME PURCHA	ASE		,	Geography: ST	ATE OF OHI	0	Evaluati	ion Period: JA	ANUARY 1, 2	2014 TO DE	ECEMBER	31, 2015	
	Total Home P Loans			Income	Moderate Borro		Middle- Borro		Upper-I Borro	Income owers	A	ggregate Le	ending Data	*
Assessment Area:	#	% of Total* *	% Familie s***	% BANK Loans** **	% Families 6	% BANK Loans***	% Families* **	% BANK Loans***	% Families* **	% BANK Loans***	Low	Mod	Mid	Upp
Full Review:														
Dollar Clev AA 2015	653	86.72	23.30	18.27	17.74	30.13	20.42	17.63	38.54	33.97	11.82	25.71	25.38	37.09
Limited Review:														
Dollar Akron AA 2015	100	13.28	21.34	23.23	17.68	21.21	21.88	13.13	39.10	42.42	12.93	25.51	24.34	37.21

^{*} Based on 2015 Peer Mortgage Data -- US and PR ** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{****} Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.0% of loans originated and purchased by BANK.

6 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution:	HOME IMPRO	VEMEN'	Т		Geograp	hy: STATE C	F OHIO	E	Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
		Total Home Improvement Loans		Low-Income Borrowers		te-Income rowers	Middle- Borro	Income	Upper- Borro	Income owers	A	ggregate Le	nding Data	*		
Assessment Area:	#	% of Total **	% Families* **	% BANK Loans** **	% Families 7	% BANK Loans***	% Families* **	% BANK Loans***	% Families* **	% BANK Loans***	Low	Mod	Mid	Upp		
Full Review:																
Dollar Clev AA 2015	699	90.66	23.30	7.87	17.74	18.66	20.42	24.20	38.54	49.27	12.69	19.25	23.69	44.37		
Limited Review:																
Dollar Akron AA 2015	72	9.34	21.34	2.78	17.68	13.89	21.88	20.83	39.10	62.50	13.37	19.07	22.10	45.45		

^{*} Based on 2015 Peer Mortgage Data -- US and PR
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by BANK.
7 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution	n: HOME MOR	EFINANCE	,	Ge	eography: STA	ATE OF OHIO)	Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015								
Total Home Mortgage Refinance Loans		00	Low-Income Borrowers		Moderate-Income Borrowers		Middle- Borro	Income	* *	Upper-Income Borrowers		Aggregate Lending Data*				
Assessment Area:	#	% of Total **	% Families ***	% BANK Loans*** *	% Families 8	% BANK Loans***	% Families* **	% BANK Loans***	% Families* **	% BANK Loans***	Low	Mod	Mid	Upp		
Full Review:																
Dollar Clev AA 2015	995	91.62	23.30	5.61	17.74	15.29	20.42	24.46	38.54	54.64	8.38	17.91	25.61	48.10		
Limited Review:																
Dollar Akron AA 2015	91	8.38	21.34	3.30	17.68	15.38	21.88	25.27	39.10	56.04	9.43	18.65	23.90	48.02		

^{*} Based on 2015 Peer Mortgage Data -- US and PR ** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by BANK.

8 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SM	ALL LOANS TO	O BUSINESSES		Geography: ST.	ATE OF OHIO	Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
	Total Sma Busin		Businesses With million		Loans by Origina	l Amount Regardless	of Business Size	Aggregate Le	ending Data*				
		% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less						
Full Review:													
Dollar Clev AA 2015	303	92.38	76.74	43.23	70.63	17.49	11.88	28,111	13,209				
Limited Review:													
Dollar Akron AA 2015	25	7.62	78.33	48.00	60.00	12.00	28.00	8,072	3,452				

^{*} Based on 2015 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).
**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 19.21% of small loans to businesses originated and purchased by the bank.

Table 14a. Qualified Investments

QUALIFIED INVESTME	NTS		Geography:	STATE OF OHIO	Evalu	uation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
	d Investments*	Current Peri	od Investments		Total Investments	Unfunded Commitments**							
Assessment Area:	ssessment Area: # \$(000's)		#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)				
Full Review:		-											
Dollar Clev AA 2015	1	\$2,261.327	87	\$2,419.650	88	\$4,680.977	0.17	0	0				
Limited Review:													
Dollar Akron AA 2015	0	0	0	0	0	0	0.00	0	0				

^{* &#}x27;Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15a. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRA	NCH DEL	IVERY SYS	TEM AND B	RANCH	OPENINO	GS/CLOSI	NGS Geo	ography: STA	TE OF OHIO) Evalua	ition Per	iod: JA	NUAR	XY 1, 201	4 TO DEC	CEMBER :	31, 2015	
	Deposits			Branch	es			Branch Openings/Closings							Population			
Assessment Area:	% of Rated Area	# of BANK Branches	% of Rated Area	Location of Branches by Income of Geographies (%)			# of Branch	# of Branches Branch (+ or -)			ı of	% of Population within Each Geography						
	Deposits in AA		Branches in AA	Low	Mod	Mid	Upp	Openings	Closings	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																		
Dollar Clev AA 2015	100.00	27	96.43	10.34	13.79	41.38	34.48	0	0	0	0	0	0	11.90	19.83	37.99	30.27	
Limited Review:																		
Dollar Akron AA 2015	0.00	2	3.57	0.00	0.00	100.00	0.00	0	0	0	0	0	0	10.71	22.08	33.32	33.88	

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BR.	ANCH and A	TM DELIV	VERY SYS	TEM	Geogr	raphy: DC	LLAR C	LEV AA	Eva	aluation I	Period : JA	NUARY	1, 2014 TO	O DECEM	BER 31, 2	2015	
Assessment Area:	Deposits			Branc	hes						Population						
	% of Total Bank						# of Bank	# of Total	Location of ATMs by Income of Geographies				% of Population within Each Geography				
	Deposits	K Branc hes	Bank Branch es	Low	Mod	Mid	Upp	ATMs	Bank ATMs	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Dollar Clev AA 2015	100.00	27	40.91	10.34	13.79	41.38	34.48	42	127	9.52	16.67	38.10	35.71	11.90	19.83	37.99	30.27
Limited Review:																	
Dollar Akron AA 2015	0.00	1	1.52	0	0	100.0	0	3	127	0	0	66.67	33.33	10.71	22.08	33.32	33.88