



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

March 30, 2020

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Greenville National Bank  
Charter Number 13944

446 South Broadway, Greenville, OH 45331

Office of the Comptroller of the Currency

West Lake Center, 4555 Lake Forest Drive, Suite 520 Blue Ash, OH 45242

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 **Satisfactory**.

**The lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory**

The major factors that support this rating include:

- The Lending Test rating is based on reasonable borrower-income distributions of both home mortgage and consumer loans.
- The Community Development (CD) Test rating is based on satisfactory performance in Ohio, and excellent performance in Indiana.

### Loan-to-Deposit Ratio

Considering Greenville National Bank's (GNB or bank) size, financial condition, and credit needs of the assessment areas (AAs), the bank's loan-to-deposit (LTD) ratio is reasonable. The bank had a 12-quarter average LTD ratio of 88.9 percent. This was higher than the peer group average of 88.6 percent. The peer group was comprised of 10 community banks and thrifts headquartered in or near one of GNB's AAs. GNB's LTD ratio gradually increased during the review period, ranging from as low as 83.9 percent at March 31, 2017, to as high as 93.2 percent at December 31, 2018. GNB sells a small percentage of their mortgage loan production on the secondary market. The LTD ratio is not materially impacted by such sales activity.

### Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated and purchased 71.1 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. During the three-year evaluation period, GNB originated 71.9 percent of home mortgage loans inside its AAs. The percentage of mortgage loans inside its AAs increased each year during the evaluation period. GNB originated 60.0 percent of consumer loans inside its AAs; however, only 49.5 percent of loans by dollar amount were inside its AAs. The bank maintains relationships with a substantial network of vehicle dealers both inside and outside its AAs. These relationships result in a lower, though still reasonable, percentage of consumer loans inside the AAs.

Table D is based on all HMDA-reportable home mortgage loans and the sampling of consumer loans originated during the three-year evaluation period.

**Table D - Lending Inside and Outside of the Assessment Area**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	568	71.9	222	28.1	790	77,563	67.4	37,481	32.6	115,044
Consumer	36	60.0	24	40.0	60	798	49.5	815	50.5	1,613
Total	604	71.1	246	28.9	850	78,361	67.2	38,296	32.8	116,657

Source: Home Mortgage Disclosure Act lending data. Consumer loan figures are the result of randomly sampled loan originations during the evaluation period.

## Description of Institution

GNB is a wholly-owned subsidiary of Greenville National Bancorp, a one-bank holding company headquartered in Greenville, Ohio. As of December 31, 2019, the bank had total assets of \$484 million, and tier 1 capital of \$51 million, or 10.5 percent of total assets.

GNB is a traditional full-service community bank and offers a wide array of banking products. The primary loan products are residential mortgage and consumer. GNB sells a small amount of mortgage loans on the secondary market. The bank's balance sheet reflects the diversity of product offerings. At December 31, 2019, residential mortgage represented 39 percent of outstanding loans, agriculture 23 percent, commercial 22 percent, and consumer 16 percent. However, bank supplied loan production reports demonstrate that on a per unit basis, consumer loans reflect a substantial amount of recent loan origination activity.

GNB is a multi-state bank with ten full-service banking offices; seven in Darke County, Ohio, two in Miami County, Ohio, and one in Randolph County, Indiana. Seven of the ten branches also have automated teller machines (ATMs). In addition, GNB has a loan production office in Darke County. Darke County, in its entirety, is included in the bank's overall Assessment Area (AA). Two Darke County branches and the consumer loan production office are located in moderate-income CTs. The Miami County AA considered as part of this evaluation is not the entire county, rather is comprised of 11 CTs; 10 middle-income and 1 upper-income. The Miami County AA is reasonably designated based on branch location and lending patterns. In Indiana, the AA is comprised of seven CT areas in three non-MSA counties. The AA is comprised mostly of a large portion of Randolph County, and one CT each in Henry and Wayne Counties. There is one moderate-income CT in the Indiana non-MSA AA.

The Federal Deposit Insurance Corporation (FDIC) attributes 91.7 percent of bank deposits to Darke County, 6.6 percent to the Miami County AA, and 1.8 percent to the Indiana non-MSA AA. The location of deposit-taking offices triggers multiple state rating areas, one is Ohio, the other Indiana. Further, inside the Ohio rating area the bank operates deposit-taking offices in both an MSA area (Miami County, a part of the Dayton, Ohio MSA) and a non-MSA area (Darke County). Therefore, performance in Ohio is analyzed separately for Darke County and Miami County, as both the demographic information and the nature of the markets vary significantly.

Management made multiple changes to the AAs in effect during the review period. In November 2017, six CTs were added to the Miami County AA to reflect the opening of a branch in Troy, Ohio. In August 2019, 5 CTs were added to the Miami County AA in and around the city of Piqua. In May 2019, four CTs, including the moderate-income CT, were added to the Indiana non-MSA AA to better reflect lending operations.

No legal or financial impediments exist that would restrict GNB's ability to meet the credit needs of the area. The bank's primary competitors are other community banks with the exception of Miami County where in addition to community banks there are also a number of large banks present. The OCC conducted the bank's last CRA evaluation as of March 27, 2017, which resulted in an overall "Satisfactory" rating.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The evaluation period encompasses 2017, 2018 and 2019. Based on reviews of the bank's Call Reports and loan production reports, the OCC determined consumer and home mortgage loans are the bank's primary lending products.

To assess performance, the OCC randomly sampled consumer loans and analyzed all home mortgage loans reported by the bank under the Home Mortgage Disclosure Act (HMDA). Demographic and peer data was used to help assess performance. The AA changes made during the evaluation period impacted both the demographic and peer data. Thus, separate analysis of lending data for both the Ohio and Indiana state rating areas was performed. Due to the timing of these AA changes, the Ohio rating area analysis for 2017 was separated from the 2018 and 2019 analysis. Similarly, the Indiana rating area analysis for 2019 was separated from the 2017 and 2018 analysis. The AA change dates were rounded to the nearest year-end to enable whole year analysis.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AAs within that state are required to be analyzed as a full-scope review. In Ohio, the OCC selected the Darke County AA for a full scope review. In Indiana, the one AA was analyzed as a full-scope review. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full-and limited-scope AAs.

### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

Since nine of ten branches and the large majority of deposits being attributed to Ohio, performance in the state of Ohio was given much greater weight than performance in Indiana.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank'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, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Ohio

**CRA rating for Ohio:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The bank exhibits an excellent geographic distribution of loans in the state.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.
- The bank's performance under the Community Development Test in Ohio is rated Satisfactory.

### Description of Institution's Operations in Ohio

The Darke County non-MSA AA includes all of Darke County, Ohio. The AA consists of 12 CTs, comprised of eight middle-income CTs (66 percent), two moderate-income CTs (17 percent), and two upper-income CTs (17 percent). As of the 2015 American Community Survey (ACS) conducted by the U.S. Census Bureau, the population in this AA was 52,356, with 20,865 households and 22,723 housing units. Census bureau annual estimates completed since the 2015 ACS Survey show a slight decline in the population to 51,323 at July 1, 2018.

According to the 2015 ACS Survey, 66.2 percent of the housing units are owner occupied, 25.6 percent are renter occupied, and 8.2 percent are vacant. There are more owner-occupied housing units in middle- and upper-income CTs proportional to the number of total housing units in middle- and upper-income CTs. Conversely, 28.6 of rental units are in the two moderate-income CTs despite only a total of 16.5 percent of housing units coming from the two moderate-income CTs. Thus, the number of housing units are skewed toward middle-and upper-income CTs.

Banking competition is significant in the AA, with 12 deposit-taking banks present. At June 30, 2019, Federal Deposit Insurance Corporation (FDIC) market share reports indicate GNB ranked first in the AA, with 28.8 percent of deposits. There is limited competition for deposits in the AA, but numerous community banks are present. The number of banks accepting deposits in the AA increased from 11 to 12 during the evaluation period. Many out of area banks, mortgage companies and credit unions are active in the mortgage lending market. The most recent mortgage market share data from 2018 indicates GNB ranked second out of 107 HMDA reporting mortgage lenders, with an 11.2 percent market share.

Darke County has a diverse and stable economy, primarily centered in agriculture and manufacturing. Per the Darke County Economic Development, the largest employers in Darke County, excluding retail operations, are Whirlpool Corporation, Midmark Corporation, and Greenville Technology.

The unemployment figures for Darke County are favorable when compared to the Ohio average. Per the Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate for Darke County was 3.5

percent, while the statewide rate in Ohio was 3.8 percent. Per the 2015 ACS Survey, 20.1 percent of households in the moderate-income CTs are below the poverty line, compared to 11.5 percent and 6.1 percent for the middle- and upper-income CTs, respectively. The high rates of poverty in the moderate-income CTs are considered a significant obstacle to mortgage lending and constricts the market for home mortgage lending in those moderate-income CTs.

The median housing value in the AA was \$110,158, while the median family income was \$55,785, meaning low-income families made less than \$27,893. Therefore, median housing values were at least 3.9 times the annual income of low-income families in Darke County, which is reflective of an obstacle to homeownership for low-income families and reduced opportunities for responsible mortgage lending. The overall poverty rate in the county is 9.9 percent and considered moderate.

In summary, the OCC considered several substantive matters as performance context in this CRA evaluation. The poverty rate inside the moderate-income CTs is an obstacle to both consumer and mortgage lending in those CTs. The poverty rate is an obstacle to consumer lending for low-income borrowers throughout the county. Lastly, the OCC considered home affordability as an obstacle to mortgage lending to low-income borrowers throughout the county.

The OCC also reviewed the information provided from a recent interview with a representative of a community action agency that provides a wide variety of assistance to low-income residents of a nine-county area of Western Ohio, including Darke County. The contact also mentioned needs for affordable small dollar loans for any number of needs, including home or vehicle repairs. The contact also noted community service opportunities such as leadership opportunities with non-profit organizations.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Darke County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	16.7	66.7	16.7	0.0
Population by Geography	52,356	0.0	15.2	70.7	14.1	0.0
Housing Units by Geography	22,723	0.0	16.5	70.9	12.6	0.0
Owner-Occupied Units by Geography	15,053	0.0	11.4	74.4	14.2	0.0
Occupied Rental Units by Geography	5,812	0.0	28.6	63.0	8.4	0.0
Vacant Units by Geography	1,858	0.0	19.7	67.7	12.6	0.0
Businesses by Geography	2,863	0.0	21.5	62.3	16.2	0.0
Farms by Geography	462	0.0	2.8	82.0	15.2	0.0
Family Distribution by Income Level	14,154	21.2	17.5	24.1	37.3	0.0
Household Distribution by Income Level	20,865	22.4	18.3	19.5	39.8	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$110,158
			Median Gross Rent			\$610
			Families Below Poverty Level			9.9%
Source: 2015 ACS Census, and 2019 D&B Data Due to rounding, totals may not equal 100.0 (* ) The NA category consists of geographies that have not been assigned an income classification.						



## Scope of Evaluation in Ohio

The Darke County AA was evaluated using full-scope procedures. Darke county has seven of the bank's 9 Ohio deposit-taking offices, or 77.8 percent. Those seven offices account for 93.3 percent of the bank's deposits in the State of Ohio. Further, one of the two offices in Miami County was not open during the entire evaluation period. Therefore, performance in Darke County was given much greater weight than performance in Miami County.

Mortgage and consumer lending were given equal weight. The bank makes many more consumer than mortgage loans, but the average consumer loan is much smaller in dollar amount than the average mortgage loan. Further, mortgage loans are generally considered more impactful to consumers. Finally, due to the relatively homogenous nature of the AA, the OCC gave more weight to the borrower-income analysis as compared to the geographic-income comparison.

To align with whole year HMDA data analysis, AA changes during the review period were rounded to the nearest whole year. Thus, 2018 and 2019 data was combined into one analysis, while 2017 data was analyzed separately.

## LENDING TEST

The bank's performance under the Lending Test in Ohio is rated Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Darke County AA is reasonable.

## Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in the state.

### *Home Mortgage Loans*

Refer to Table O in the Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

To assess performance under this criterion, the OCC compared the percentage of home mortgage loans to the percentage of owner-occupied units in each of the four borrower income categories, placing emphasis on lending to low-and moderate-income CTs (demographic data). The OCC also compared the bank's performance against other active mortgage lenders in the AA, as demonstrated by HMDA aggregate data.

The geographic-income distribution of home loans is more than reasonable.

In the 2018 to 2019 review period, GNB originated 12.9 percent of home mortgage loans in moderate-income CTs, which exceeded the percentage of home mortgage loans of other home mortgage lenders (aggregate data), which was 11.4 percent. Further, GNB's home mortgage lending is reflective of an excellent geographic distribution when compared to the moderate-income demographic, which was also 11.4 percent. The OCC considered the poverty rate inside the moderate-income CTs (20.1 percent) as

an obstacle to home mortgage lending in those CTs. There are no low-income CTs in the Darke County AA. GNB's performance in 2017 was consistent with the performance in the 2018 to 2019 review period.

### ***Consumer Loans***

Refer to Table U in the Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Unlike home mortgage lending, there is no aggregate reporting data from other lenders available to assist in gauging the bank's consumer lending performance. Performance is based on lending in each CT category, with consideration given to the percent of households in each CT category. In addition, median household incomes (demographic comparator) are used in the consumer lending analysis, rather than median family incomes.

The geographic distribution of consumer loans is reasonable.

Based on the bank's 2018 and 2019 consumer loan data, the percentage of consumer loans originated in moderate-income CTs (10.0) was below the demographic data (16.2) in those moderate-income CTs. However, the analysis considered the poverty rate in the moderate-income CTs (20.1) as an obstacle to lending. GNB's performance in 2017 was consistent with the performance in the 2018 to 2019 review period.

### ***Lending Gap Analysis***

There were no unexplained conspicuous gaps in lending patterns noted.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in the Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

To assess performance under this criterion, the OCC compared the percentage of home mortgage loans to the percentage of families living in each of the four borrower income categories, placing emphasis on lending to low-and moderate-income families (demographic data). The OCC also compared the bank's performance against other active mortgage lenders in the AA, as demonstrated by HMDA aggregate data.

The bank exhibits a reasonable distribution of home mortgage loans based on borrower-income levels.

In the 2018 to 2019 review period, the bank originated 4.1 percent of loans to low-income families, which was well below the percentage of lending to low-income families demonstrated in the aggregate HMDA data, (8.7 percent). The bank's home lending to low-income families was also well below the

percent of low-income families in the AA, (21.2 percent). The OCC considered both the significant poverty rate (9.9 percent) and the relatively high-cost of housing compared to the incomes of low-income families. For instance, the median cost of housing is at least 3.9 times the annual income of low-income families in the AA.

Also in the 2018 to 2019 review period, the bank originated 19.0 percent of its home loans to moderate-income families, which was below the aggregate data (26.8 percent) but exceeded the demographic data (17.5 percent).

Performance in 2017 was consistent with the performance in the 2018 to 2019 period.

### ***Consumer Loans***

Refer to Table V in the Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Unlike home mortgage lending, no aggregate reporting data from other lenders is available to assist in gauging the bank's consumer lending performance. Therefore, performance is based on an analysis of lending compared to the percent of households in each of the four income categories (demographic data), with an emphasis on the low-and moderate-income categories. In addition, median household incomes were used for the consumer lending analysis, rather than median family incomes.

The bank exhibits a reasonable distribution of consumer loans based on borrower-income levels.

Based on the OCC's analysis of the 2018 and 2019 consumer loan data, consumer loans originated to low-income borrowers (3.3 percent) was well below the demographic data (22.4 percent). However, the OCC considered the obstacle to lending to low-income individuals presented by the substantial poverty rate in the AA. Consumer lending to moderate-income borrowers (23.3 percent) exceeded the demographic data (18.3 percent).

GNB's performance in 2017 was inferior to performance in the 2018 to 2019 review period. In 2017, the bank's consumer lending (15.0 percent) was below the moderate-income demographic (18.3 percent). Greater weight was attributed to the performance in the 2018 to 2019 period.

### **Responses to Complaints**

The bank received no complaints regarding CRA performance during the evaluation period.

### **Conclusions for Area Receiving Limited Scope Review**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Miami County AA is consistent with the bank's overall performance under the Lending Test in the Darke County AA.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in Ohio is rated Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on full-scope review and limited scope reviews, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the Darke County AA.

### Number and Amount of Community Development Loans

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Darke County	8	100.0	3,750	100.0
Miami County	0	0.0	0	0.0
Outside Area	0	0.0	0	0.0
Total	8	100.0	3,750	100.0

The bank made a number of loans to small businesses with a community development purpose. One example is a \$2.3 million loan to construct a new service station and truck stop in a moderate-income CT of Greenville that resulted in the employment of 8 individuals. Other smaller loans were made for purposes such as renovating or rehabilitating commercial properties located in moderate-income CTs, which had a stabilizing impact in that part of Greenville.

### Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, sets forth the information and data used to evaluate the bank's level of qualified CD investments, including prior period investments that remain outstanding as of the examination date.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Darke County	2	265	51	91	53	82.8	356	98.1	0	0
Miami County	0	0	10	6	10	15.6	6	1.7	0	0
Greater Regional	0	0	1	1	1	1.6	1	0.2	0	0
Total	2	265	62	98	64	100.0	363	100.0	0	0

\* Prior Period Investments means investments made in a previous evaluation 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.

The bank purchased a bond in 2014 that had a primary purpose of paying for new school construction of a K-8 elementary and middle school for Greenville City Schools. The construction was associated with the State of Ohio's Classroom Facilities Assistance Program. A majority of students in the Greenville elementary and middle school are eligible for either free or reduced-price lunches, according to the Ohio Department of Education. The book value of the investment was \$226,000 at the examination date. Other qualifying investments were primarily grants for a variety of qualifying purposes, such as aid to needy children, general poverty relief, and economic development.

### **Extent to Which the Bank Provides Community Development Services**

Impactful community development services were noted in the form of maintaining three banking offices in moderate-income areas of Greenville. Further, the bank's consumer lending office is also located in a moderate-income census tract. The maintenance of these offices serves to increase access to financial services to the entire community, including low- and moderate-income residents.

Other notable community development services include bank management serving in leadership roles such as president, treasurer or board member of non-profit organizations such as housing authorities and community health centers. Further, financial literacy of low-to moderate-income students is supported in the form of both presentations and donations of educational materials to teachers.

### **Conclusions for Area Receiving a Limited Scope Review**

Based on a limited-scope review, the bank's performance under the CD Test in the Miami County AA is weaker than the bank's overall performance under the CD Test in the Darke County AA. The number of qualifying loans, investments and services was less than in Darke County. Greater weight was provided to performance in the Darke County AA than the Miami County AA due to the bank's much larger and more established operating presence in Darke County and greater community needs being present.

## State Rating

### State of Indiana

**CRA rating for the State of Indiana:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Outstanding

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of loans in the state.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.
- The bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

### Description of Institution's Operations in Indiana

The nature of GNB operations in Indiana do not vary materially from those in Ohio.

The Non-MSA Indiana AA includes seven adjoining census tracts (CTs) in three different Indiana counties: Randolph, Wayne, and Henry. The board expanded the AA from three CTs to seven in May of 2019 to better reflect the steady growth of business from the Indiana office. There is one branch in the town of Losantville, which is in the Southwest corner of Randolph County. Two versions of Table A are included below to illustrate the demographics of the AA before and after the AA change. The banking office is relatively new (open since 2015) and, while growing, is still small. Each CT is middle-income except for one in Randolph county that is moderate-income.

The total population in this AA for 2019 is 23,743, with 7,463 owner-occupied housing units and 1,052 vacant housing units. In 2019, there were more owner-occupied units in middle-income CTs proportional to the number of total housing units in middle-income CTs. Conversely, 29.8 percent of rental units are in the moderate-income CTs, despite only a total of 17.7 percent of housing units being in the moderate-income CT. This implies limited opportunities for home lending in the moderate-income CT.

Competition figures are available for whole counties only; thus the OCC analyzed the bank's competition in this AA by reviewing Randolph, Wayne, and Henry counties. Banking competition in the three-county area is significant, with 15 banks accepting deposits. Based on June 30, 2019 FDIC information, GNB held \$6.6 million in deposits and GNB's market share ranked 14<sup>th</sup>, with 0.1 percent market share. Many out of area banks, mortgage companies, and credit unions are active mortgage lenders in the area. While GNB's presence is very small, the OCC notes both its deposit-taking and lending has increased substantially from the prior CRA evaluation. Further, there is no competing bank

with an office within 8 miles of the Losantville office. At the time of opening, the Losantville office was in a distressed, middle-income, non-MSA census tract.

Per the Bureau of Labor Statistics, unemployment rates for the three Indiana counties was low, but slightly higher than the statewide average. As of December 31, 2019, Randolph, Wayne, and Henry Counties had unemployment rates of 3.8, 3.3, and 3.4 percent, respectively, while the unemployment for the state of Indiana was 3.2 percent. Families below the poverty level make up 10 percent of the total three-county population. However, the OCC notes the poverty rate in the lone moderate-income CT was 24.4 percent.

Per Hoosierdata.in.gov, some of the larger employers in Randolph, Wayne, and Henry Counties include Reid Health, Reid Home Medical Equipment Store, Henry Community Health, Draper Inc., and Lifeline Personal Response.

Per the 2015 ACS Survey, the median housing value in the AA was \$92,300. The median family income was \$55,715, meaning low-income families made less than \$27,858. Therefore, median housing values were at least 3.3 times the annual income of low-income families in the AA, which is reflective of an obstacle to homeownership for low-income families.

In summary, the OCC considered several substantive matters as performance context in our evaluation of bank performance. The poverty rate is an obstacle to consumer lending for low-income borrowers throughout the AA. The poverty rate inside the moderate-income CT is an obstacle to both consumer and mortgage lending in that CT. Lastly, the OCC considered home affordability in general as an obstacle to mortgage lending to low-income borrowers throughout the county.

The OCC also reviewed the information provided from a recent interview with a representative of an economic development agency that serves a ten-county area of Eastern Indiana, including the three AA counties. Due to the vibrancy of local economic conditions, this contact noted that a substantial labor shortage was present and that the region has struggled attracting new residents. The contact also indicated a lack of affordable housing hinders the region's ability to attract new residents.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Greenville National Bank: Indiana AA - 2018</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	3	0.0	0.0	100.0	0.0	0.0
Population by Geography	10,608	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	4,497	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,494	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	569	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	434	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	350	0.0	0.0	100.0	0.0	0.0
Farms by Geography	113	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,979	15.5	20.9	21.7	41.8	0.0
Household Distribution by Income Level	4,063	18.6	19.3	19.3	42.8	0.0
Median Family Income Non-MSAs - IN		\$55,741	Median Housing Value			\$107,443

	Median Gross Rent	\$644
	Families Below Poverty Level	8.4%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>		

Table A – Demographic Information						
Greenville National Bank: Indiana AA - 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	14.3	85.7	0.0	0.0
Population by Geography	23,743	0.0	15.9	84.1	0.0	0.0
Housing Units by Geography	10,432	0.0	17.7	82.3	0.0	0.0
Owner-Occupied Units by Geography	7,463	0.0	13.1	86.9	0.0	0.0
Occupied Rental Units by Geography	1,917	0.0	29.8	70.2	0.0	0.0
Vacant Units by Geography	1,052	0.0	28.1	71.9	0.0	0.0
Businesses by Geography	1,130	0.0	20.8	79.2	0.0	0.0
Farms by Geography	221	0.0	2.7	97.3	0.0	0.0
Family Distribution by Income Level	6,627	18.2	21.3	22.2	38.3	0.0
Household Distribution by Income Level	9,380	22.2	18.3	19.7	39.8	0.0
Median Family Income Non-MSAs - IN		\$55,715	Median Housing Value			\$92,300
			Median Gross Rent			\$593
			Families Below Poverty Level			10.0%
Source: 2015 ACS Census and 2019 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

## Scope of Evaluation in Indiana

The loan AA in the State of Indiana was evaluated using full-scope procedures.

Due to the timing of a management change to the AA in Indiana, 2017 and 2018 data are combined for analysis purposes, while 2019 is analyzed separately.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

### LENDING TEST

The bank's performance under the Lending Test in Indiana is rated Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review



Based on a full-scope review, the bank's lending performance in the state of Indiana is reasonable.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the state.

#### ***Home Mortgage Loans***

Refer to Table O in the Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

To assess performance under this criterion, the OCC compared the percentage of home mortgage loans to the percentage of owner-occupied units in each of the four borrower income categories (demographic data), placing emphasis on lending to low-and moderate-income CTs. The OCC also compared the bank's performance against other active mortgage lenders in the AA, as demonstrated by HMDA aggregate data.

The geographic-income distribution of home loans is more than reasonable.

In the 2017 to 2018 review period, no meaningful analysis was possible due to the lack of any low-or moderate-income CTs. In 2019, the AA was expanded to include a moderate-income CT. GNB originated 31.3 percent of its home mortgage loans in the lone moderate-income CT that year, which exceeded the the aggregate HMDA data (13.1 percent). The bank's percentage of home mortgage lending in the moderate-income CT also exceeded the demographic (also 13.1 percent). The OCC considered the poverty rate inside the moderate-income CT (24.4 percent) as an obstacle to home mortgage lending in that CT.

#### ***Consumer Loans***

Refer to Table U in the Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Unlike home mortgage lending, there is no aggregate reporting data from other lenders available to assist in gauging the bank's consumer lending performance. Performance is based on lending in each CT category, with consideration given to the percent of households in each CT category. In addition, median household incomes (demographic comparator) are used in the consumer lending analysis, rather than median family incomes.

The geographic distribution of consumer loans is more than reasonable.

As with home lending, no meaningful geographic analysis was possible for the 2017 to 2018 period. In 2019, consumer loans originated in moderate-income CTs (25.0 percent) exceeded the percentage of households (16.5 percent) in those moderate-income CTs. The OCC's analysis considered the percent of households in the moderate-income CTs that are below the poverty line (24.4 percent) and the obstacle to lending created.

#### ***Lending Gap Analysis***

There were no unexplained conspicuous gaps in lending patterns noted.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in the Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The bank exhibits a reasonable distribution of home mortgage loans to borrowers of different income levels in the Indiana non-MSA AA.

In the 2017 to 2018 review period, the bank originated 9.5 percent of home loans to low-income families, which was below the percentage of lending to low-income families demonstrated in the aggregate HMDA data (11.5 percent). The bank's home lending to low-income families was also below the percent of low-income families in the AA, (15.5 percent).

Performance in 2019 was inferior to the performance in the 2017 to 2018 period, as home loans to both low-and moderate-income families were lower than in the 2017 to 2018 review period. During the 2019 review period, GNB did not originate any home loans to low-income families. They did originate 18.8 percent of home loans to moderate-income borrowers but was below the aggregate HMDA data (25.7 percent), and below the percentage of moderate-income families in the AA (21.3 percent).

In our analysis, The OCC considered both the significant poverty rate and the relatively high-cost of housing as compared to the incomes of low-income persons. For instance the median cost of housing is at least 3.3 times the annual income of low-income families in the AA.

### ***Consumer Loans***

Refer to Table V in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Unlike home mortgage lending, no aggregate reporting data from other lenders is available to assist in gauging the bank's consumer lending performance. Therefore, performance is based on analysis of lending to the percent of households in each of the four income categories (demographic data), with emphasis placed on low-and moderate-income categories. In addition, the OCC used median household incomes for the consumer lending analysis, rather than median family incomes.

The bank exhibits a reasonable distribution of consumer loans to individuals of different income levels.

In the 2017 to 2018 review period, consumer loans originated to low-income borrowers (5.0 percent) was well below the demographic data (18.6 percent). However, the OCC considered the obstacle to lending to low-income individuals presented by the substantial poverty rate in the AA. Consumer lending to moderate-income borrowers (15.0 percent) was somewhat below the demographic data (19.3 percent). GNB's performance in 2019 was similar to performance in the 2017 to 2018 period.

## Responses to Complaints

The bank received no complaints regarding CRA performance during the evaluation period.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in Indiana is rated Outstanding.

## Conclusions for Area Receiving a Full Scope Review

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

## Number and Amount of Community Development Loans

Refer to the Community Development Loans table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
IN-Non MSA	2	40.0	2,650	67.8
Greater Regional	3	60.0	1,260	32.2
Total	5	0.0	3,910	100.0

The bank has a relationship with an expanding manufacturing business in the Indiana non-MSA AA. Total loans made totaled \$3.6 million increase in a line of credit was made to support continued business expansion. The business is located in the moderate-income CT. In further support of the revitalizing impact that this business and this equity line expansion have had, the business also has a forgivable loan from a municipal government. The amount forgivable is related to the number of jobs created.

Two of the three loans listed in the table as qualifying regional loans are also located in a moderate-

income CT but were made prior to management's AA change.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
IN-Non MSA	0	0	6	2	6	85.7	2	67.7	0	0
Greater Regional	0	0	1	1	1	14.3	1	33.3	0	0
Total	0	0	7	3	7	100.0	100	100.0	0	0

\* Prior Period Investments' means investments made in a previous evaluation 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.

Qualifying investments included small donations to non-profit organizations established to provide services to LMI persons, such as students, homeless veterans and women in crisis pregnancy situations.

### Extent to Which the Bank Provides Community Development Services

GNB did not provide community development services in the Indiana AA; however, the 2015 opening of the Losantville office served to increase access to financial services in a distressed non-metropolitan middle-income CT. Management has maintained the office throughout the current evaluation period. There are no other banking offices near the Losantville office. Lastly, 42 percent of households in the bank's Indiana Non-MSA AA are low-or moderate-income. Both total deposits and lending activity have increased substantially since the previous CRA evaluation.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) 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”.

<b>Time Period Reviewed:</b>	01/01/17 to 12/31/19	
<b>Bank Products Reviewed:</b>	Home mortgage, consumer loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State</b>		
Ohio		
Darke County, Non-MSA AA	Full-scope	Darke County
Miami County, Dayton MSA AA	Limited-scope	Portion of Miami County, includes City of Troy and western portion of Miami County bordering Darke County.
Indiana	Full-scope	Portions of Randolph, Wayne and Henry Counties, including village of Losantville.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS      Greenville National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Greenville National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Ohio	Satisfactory	Satisfactory	Satisfactory
Indiana	Satisfactory	Outstanding	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, other secured consumer loans, and other unsecured consumer loans.

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

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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, and half below, a range of incomes.



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

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

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 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 1 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.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, 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 are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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 O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - 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 aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - 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 MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were 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) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - 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 aggregate peer data for the years the data is available. Because aggregate 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 T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -**  
Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** 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 in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** 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 households by income level in each MMSA/assessment area.

STATE OF OHIO

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography (OHIO)																			2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Darke County	135	16,860	90.0	1,153	0.0	0.0	0.0	11.4	11.9	11.8	74.4	74.8	76.0	14.2	13.3	12.2	0.0	0.0	0.0
Miami County	15	1,525	10.0	515	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	150	18,385	100.0	1,668	0.0	0.0	0.0	8.1	10.7	8.2	81.7	77.3	83.4	10.2	12.0	8.5	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography (OHIO)																			2018 - 2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Darke County	295	37,322	77.4	1,241	0.0	0.0	0.0	11.4	12.9	11.4	74.4	73.2	75.8	14.2	13.9	12.8	0.0	0.0	0.0	
Miami County	86	17,624	22.6	1,772	0.0	0.0	0.0	0.0	0.0	0.0	88.7	90.7	85.0	11.3	9.3	15.0	0.0	0.0	0.0	
Total	381	54,946	100.0	3,013	0.0	0.0	0.0	5.8	10.3	4.7	81.5	81.7	81.2	12.8	8.0	14.1	0.0	0.0	0.0	
Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower (OHIO)																			2017
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Darke County	135	16,860	90.0	1,153	21.2	3.0	7.7	17.5	15.6	24.3	24.1	26.7	22.6	37.3	46.7	28.7	0.0	8.1	16.7
Miami County	15	1,525	10.0	515	16.7	13.3	11.3	19.9	13.3	21.0	29.4	13.3	26.6	34.0	46.7	30.1	0.0	13.3	11.1
Total	150	18,385	100.0	1,668	19.9	4.0	8.8	18.2	15.3	23.3	25.6	25.3	23.9	36.4	46.7	29.1	0.0	8.7	14.9
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower (OHIO)																		2018 - 2019	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Darke County	295	37,322	77.4	1,241	21.2	4.1	8.7	17.5	19.0	26.8	24.1	18.3	20.5	37.3	52.2	30.5	0.0	6.4	13.5
Miami County	86	17,624	22.6	1,772	17.5	9.3	8.8	17.9	12.8	20.4	22.9	26.7	21.7	41.7	44.2	39.3	0.0	7.0	9.8
Total	381	54,946	100.0	3,013	19.3	5.7	8.8	17.7	18.9	23.1	23.5	21.7	21.2	39.5	47.4	35.6	0.0	6.3	11.3
Source: 2015 ACS Census ; 01/01/2018 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography (OHIO)</b>													<b>2017</b>
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>
Darke County	20	470	50.0	0.0	0.0	16.2	15.0	71.2	70.0	12.6	15.0	0.0	0.0
Miami County	20	891	50.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>40</b>	<b>1,361</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.7</b>	<b>7.5</b>	<b>79.1</b>	<b>85.0</b>	<b>9.1</b>	<b>7.5</b>	<b>0.0</b>	<b>0.0</b>
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Sampled Bank Data. Due to rounding, totals may not equal 100.0													

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography (OHIO)</b>													<b>2018 - 2019</b>
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>
Darke County	30	659	60.0	0.0	0.0	16.2	10.0	71.2	86.7	12.6	3.3	0.0	0.0
Miami County	20	1,087	40.0	0.0	0.0	0.0	0.0	90.7	100.0	9.3	0.0	0.0	0.0
<b>Total</b>	<b>50</b>	<b>1,746</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>8.1</b>	<b>6.0</b>	<b>81.0</b>	<b>92.0</b>	<b>10.9</b>	<b>2.0</b>	<b>0.0</b>	<b>0.0</b>
Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Sampled Bank Data. Due to rounding, totals may not equal 100.0													

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower (OHIO)</b>													<b>2017</b>
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Darke County	20	470	50.0	22.4	0.0	18.3	15.0	19.5	40.0	39.8	40.0	0.0	5.0
Miami County	20	891	50.0	18.8	5.0	16.6	25.0	20.1	20.0	44.5	50.0	0.0	0.0
<b>Total</b>	<b>40</b>	<b>1,361</b>	<b>100.0</b>	<b>21.4</b>	<b>2.5</b>	<b>17.8</b>	<b>20.0</b>	<b>19.7</b>	<b>30.0</b>	<b>41.1</b>	<b>45.0</b>	<b>0.0</b>	<b>2.5</b>
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Sampled Bank Data. Due to rounding, totals may not equal 100.0													

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower (OHIO)</b>													<b>2018 - 2019</b>
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Darke County	30	659	60.0	22.4	3.3	18.3	23.3	19.5	26.7	39.8	43.3	0.0	3.3
Miami County	20	1,087	40.0	19.7	10.0	16.5	20.0	17.8	15.0	46.1	55.0	0.0	0.0
<b>Total</b>	<b>50</b>	<b>1,746</b>	<b>100.0</b>	<b>21.0</b>	<b>6.0</b>	<b>17.4</b>	<b>22.0</b>	<b>18.6</b>	<b>22.0</b>	<b>43.0</b>	<b>48.0</b>	<b>0.0</b>	<b>2.0</b>
Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Sampled Bank Data. Due to rounding, totals may not equal 100.0													



STATE OF INDIANA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography (INDIANA)																			2017-2018
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Indiana non-MSA	21	2,025	100.0	513	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>21</b>	<b>2,025</b>	<b>100.0</b>	<b>513</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography (INDIANA)																			2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Indiana Non-MSA	16	2,208	100.0	557	0.0	0.0	0.0	13.1	31.3	13.1	86.9	68.8	86.9	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>16</b>	<b>2,208</b>	<b>100.0</b>	<b>557</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>13.1</b>	<b>31.3</b>	<b>13.1</b>	<b>86.9</b>	<b>68.8</b>	<b>86.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower (INDIANA)</b>																			<b>2017-18</b>
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Indiana non-MSA	21	2,025	100.0	513	15.5	9.5	11.5	20.9	28.6	24.0	21.7	28.6	21.8	41.8	33.3	30.5	0.0	0.0	12.2
<b>Total</b>	<b>21</b>	<b>2,025</b>	<b>100.0</b>	<b>513</b>	<b>15.5</b>	<b>9.5</b>	<b>11.5</b>	<b>20.9</b>	<b>28.6</b>	<b>24.0</b>	<b>21.7</b>	<b>28.6</b>	<b>21.8</b>	<b>41.8</b>	<b>33.3</b>	<b>30.5</b>	<b>0.0</b>	<b>0.0</b>	<b>12.2</b>
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2017 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower (INDIANA)</b>																			<b>2019</b>
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Indiana non-MSA	16	2,208	100.0	557	18.2	0.0	13.1	21.3	18.8	25.7	22.2	12.5	22.3	38.3	68.8	26.9	0.0	0.0	12.0
<b>Total</b>	<b>16</b>	<b>2,208</b>	<b>100.0</b>	<b>557</b>	<b>18.2</b>	<b>0.0</b>	<b>13.1</b>	<b>21.3</b>	<b>18.8</b>	<b>25.7</b>	<b>22.2</b>	<b>12.5</b>	<b>22.3</b>	<b>38.3</b>	<b>68.8</b>	<b>26.9</b>	<b>0.0</b>	<b>0.0</b>	<b>12.0</b>
Source: 2015 ACS Census ; 01/01/2019 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography (INDIANA)													2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Indiana non-MSA	20	412	100.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Sampled Bank Data. Due to rounding, totals may not equal 100.0														

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography (INDIANA)													2019
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Indiana non-MSA	20	493	100.0	0.0	0.0	16.5	25.0	83.5	75.0	0.0	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0													

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower (INDIANA)												2017 - 2018	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Indiana non-MSA	20	412	100.0	18.6	5.0	19.3	15.0	19.3	20.0	42.8	50.0	0.0	10.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Sampled Bank Data. Due to rounding, totals may not equal 100.0													

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower (INDIANA)													2019
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Indiana non-MSA	20	493	100.0	22.2	10.0	18.3	5.0	19.7	20.0	39.8	55.0	0.0	10.0
Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Sampled Bank Data. Due to rounding, totals may not equal 100.0													

