



PUBLIC DISCLOSURE

April 29, 2019

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

The Merchants National Bank
Charter Number 2449

100 North High Street
Hillsboro, Ohio 45133

Office of the Comptroller of the Currency

655 Metro Place South, Suite 625
Dublin, Ohio 43017

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 lending test is rated: Outstanding.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on an excellent distribution of lending in low- and moderate-income (LMI) areas and to LMI borrowers.
- The Community Development (CD) Test rating is based on adequate responsiveness to community development needs in the state of Ohio 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 areas (AAs).
- Additionally, the Merchants National Bank's (MNB or the bank) performance relative to the activities considered at the bank-wide level is excellent. These include:
 - The bank's loan-to-deposit (LTD) ratio is more than reasonable.
 - A substantial majority of the bank's loans are inside the AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable. The bank's quarterly average LTD ratio over the 13 quarters since the previous CRA evaluation (March 2016 to March 2019) is 93.9 percent. The ratio ranged from a high of 99.0 percent at December 31, 2017, to a low of 86.7 percent at March 31, 2017. We compared the bank's average LTD ratio to local competitors, which included banks with branches in the AAs with total assets less than \$1 billion. MNB's quarterly average LTD ratio of 93.9 percent compares favorably with the quarterly average LTD ratio of 86.9 percent for similarly situated financial institutions in the AAs.

Lending in Assessment Area

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

The bank originated and purchased 84.9 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. The sample included all home mortgage loans originated/purchased during the evaluation period and a sample of 40 small business and 40 consumer loans originated during the evaluation period.

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	1,013	84.6	185	15.4	1,198	144,033	81.4	32,820	18.6	176,853
Small Business	36	90.0	4	10.0	40	3,115	74.7	1,057	25.3	4,172
Consumer	36	90.0	4	10.0	40	753	90.5	79	9.5	832
Total	1,085	84.9	193	15.1	1,278	147,901	81.3	33,956	18.7	181,857

Source: 01/01/2016 – 12/31/2018 Bank Data, 2016 – 2018 HMDA Data, and Loan Samples.

Description of Institution

The Merchants National Bank (MNB or the bank) is an intrastate community bank headquartered in Hillsboro, Ohio. MNB is a wholly-owned subsidiary of Merchants Bancorp, Inc., a one-bank holding company, also located in Hillsboro, Ohio. The bank has 15 banking offices located in Brown, Clark, Clermont, Clinton, Fayette, Highland, Madison, and Union Counties. Of the 15 offices, 12 locations have drive-up facilities and 13 locations have automated teller machines (ATMs). All offices are open during normal business hours. MNB has nine offices in moderate-income geographies (which includes the main office) and six offices in middle-income geographies as of the 2015 American Community Survey (ACS) Census data. Since the prior CRA evaluation, the bank opened two branches in Clinton County with one opening in October 2018 and the other in January 2019; both are in middle-income census tracts. The bank has not closed any offices since the last evaluation. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period. The bank has four AAs located in the state of Ohio. The bank has one rating area, the State of Ohio.

The bank has operations in Highland and Fayette Counties and one census tract in Ross County, which are all in a non-metropolitan statistical area (MSA) (Non-MSA AA). Within the Cincinnati, OH-KY-IN MSA 17140, the bank operates in Brown and Clermont Counties (Cincinnati MSA AA). Within the Columbus, OH MSA 18140, the bank operates within Madison and Union Counties (Columbus MSA AA). The Springfield, OH MSA 44220 includes 35 census tracts in Clark County (Springfield MSA AA). The AAs are contiguous and meet the requirements of the regulation. The AA does not reflect illegal discrimination, nor does it arbitrarily exclude any LMI areas.

Competition in the AAs is strong. Competition is comprised of national banks, savings associations, state banks, and branches of larger financial institutions. According to the June 30, 2018 Deposit Market Share Reports from the Federal Deposit Insurance Corporation (FDIC), MNB has a 10.5 percent deposit market share in the Non-MSA AA and ranks second out of 17 financial institutions. For the Cincinnati MSA AA, MNB has a 3.2 percent deposit market share and ranks 12th out of 20 financial institutions. For the Columbus MSA AA, MNB has a 9.2 percent deposit market share and ranks fifth out of 15 financial institutions. For the Springfield MSA AA, MNB has a 0.75 percent deposit market share and ranks tenth out of 12 financial institutions. Financial institutions with significant deposit market share in the Non-MSA AA includes National Cooperative Bank, N.A. (NCB) and Fifth Third Bank. The Huntington National Bank, PNC Bank, N.A., JPMorgan Chase Bank, N.A., and U.S. Bank, N.A. have significant deposit shares in the AAs as well.

The bank serves its community with traditional deposit accounts and loans. As of December 31, 2018,

MNB had total assets of \$736.7 million and tier 1 capital of \$72.0 million. Net loans and leases, as of December 31, 2018, totaled \$617.2 million, or 83.8 percent of total assets. As of the December 31, 2018, Consolidated Reports of Condition and Income (Call Report), the loan portfolio consisted of 38.6 percent residential real estate (home mortgage), 24.5 percent commercial/commercial real estate (small loans to businesses), 30.7 percent agricultural, 3.4 percent consumer, 1.9 percent Home Equity Lines of Credit (HELOC), and 0.9 percent other loans. The bank's loan originations and purchases, based on number of loans originated, during the evaluation period (2016 – 2018) are 25.3 percent home mortgage, 41.9 percent consumer, 22.5 percent small loans to businesses, 3.9 percent agricultural, and 6.4 percent HELOC. The bank's loan originations and purchases, based on dollar amount of loans originated, during the evaluation period (2016 – 2018) are 41.0 percent home mortgage, 6.2 percent consumer, 30.7 percent small loans to businesses, 20.7 percent agricultural, and 1.4 percent HELOC loans. The bank's primary lending focus is consumer, home mortgage, and small loans to businesses based on the number of loans originated. MNB sells home mortgage loans to the secondary market.

There are no financial, legal, or other factors that impede MNB's ability to help meet the credit needs of its AAs. MNB's previous CRA rating was Outstanding as of the CRA Performance Evaluation (PE) dated April 18, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We conducted a full-scope CRA evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. We used the intermediate small bank CRA evaluation procedures to assess the bank's performance. Consumer, home mortgage, and small loans to businesses are the bank's primary lending products and were evaluated under the Lending Test. We analyzed lending activity in full-year increments during the evaluation period, January 1, 2016 to December 31, 2018. The review included all home mortgage loans reported in the Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LAR) for 2016, 2017, and 2018. We completed transaction testing on a random sample of consumer and small loans to businesses originated in the evaluation period for each AA. For the lending test, we selected 20 consumer and 20 small loans to businesses originated in 2016 in each AA and 20 for each product type in 2017 – 2018 in each AA, or all if less than 20 per year.

Due to changes in demographic information during the evaluation period, we used the 2010 U.S. Census data for analysis and comparison purposes for loans originated/purchased in 2016 and the 2015 ACS Census data for loans originated/purchased in 2017 and 2018.

Selection of Areas for Full-Scope Review

We completed a full-scope review of the Non-MSA AA and the Cincinnati MSA AA. We completed limited-scope reviews of the Columbus MSA AA and the Springfield MSA AA. Refer to appendix A and Scope of Examination for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on the state of Ohio rating, as MNB only operates in the state of Ohio.

The state rating is based on the full-scope reviews of the Non-MSA AA and Cincinnati MSA AA and the limited-scope reviews of the other two AAs. We placed equal weight on all the AAs, except for the Springfield MSA AA. We placed the least weight on the Springfield MSA AA because we did not have at least 20 loans per evaluation period and per AA for analysis purposes. According to the FDIC's market share report as of June 30, 2018, 64.6 percent of the deposits are in the Non-MSA AA and 16.1 percent are in the Cincinnati MSA AA. Refer to the "Scope" section under the 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 bank has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank'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 the State of Ohio: Outstanding.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of loans during the evaluation period.
- The bank exhibits an excellent distribution of loans to individuals of different incomes and businesses of different sizes, given the product lines offered by the bank.
- The bank exhibits adequate responsiveness to community development needs in the state of Ohio 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 AAs.
- The LTD ratio is more than reasonable.
- A substantial majority of the bank's loans are inside the bank's AAs during the evaluation period.

Description of Institution's Operations in Ohio

MNB has four AAs in the state of Ohio: Non-MSA AA, Cincinnati MSA AA, Columbus MSA AA, and the Springfield MSA AA. Bank management selected the AAs based on their targeted lending area and office locations. The AAs are contiguous, meet the requirements of the regulation, and do not arbitrarily exclude LMI geographies. The bank opened a branch in Wilmington, Ohio (Clinton County) in October 2018 and another office in Wilmington in January 2019. Clinton County is located in the Non-MSA AA. After opening these offices, the bank expanded their AA to include Clinton County. For this CRA evaluation, we did not include Clinton County in the analysis, as the bank had less than three months of lending and deposit activity in this County. Clinton County will be included in the analysis at the next CRA evaluation.

The underlying demographics changed in 2015 due to the American Community Survey (ACS). The 2016 analysis used the 2010 U.S. Census demographics. The 2017 – 2018 analysis used the 2015 ACS Census demographics. The 2015 ACS Census data resulted in changes to the census tract classifications. The census tract classification changed for two branch offices during the evaluation period. The Mt. Orab office in the Cincinnati MSA AA was located in a middle-income geography as of the 2010 U.S. Census, and is now a moderate-income geography as of the 2015 ACS Census. The Washington Courthouse office in the Non-MSA AA was located in a middle-income geography as of the 2010 U.S. Census, and is now a moderate-income geography as of the 2015 ACS Census.

See below for detailed descriptions of the full-scope AAs reviewed during this CRA evaluation. In addition to the full-scope reviews, we completed limited-scope reviews of the Columbus MSA AA and the Springfield MSA AA. The Columbus MSA AA includes Madison and Union Counties in the Columbus, OH MSA 18140. Madison County is contiguous to Fayette County, and is located north of Fayette County and west of Columbus, Ohio. Union County is north of Madison County. London is the largest city in Madison County, and Marysville is the largest city in Union County. The bank has two offices in the Columbus MSA AA: one in London (middle-income) and one in Marysville (moderate-income). The Springfield MSA AA includes 35 census tracts in Clark County located in the Springfield, OH MSA 44220. Clark County is west Madison County. Springfield is the largest city. The bank has one office located in Springfield, Ohio, in a middle-income geography.

As part of this CRA evaluation, we conducted one interview with a representative from a local community development organization that provides affordable housing and services to LMI individuals in Madison and Union Counties in the Columbus MSA AA. The contact identified general retail banking services, with low-cost checking accounts and short-term small dollar loans, as banking needs in the community. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA, 2010 U.S. Census (2016)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.0	29.4	70.6	0.0	0.0
Population by Geography	78,296	0.0	26.8	73.2	0.0	0.0
Housing Units by Geography	34,044	0.0	30.1	69.9	0.0	0.0
Owner-Occupied Units by Geography	21,498	0.0	25.1	74.9	0.0	0.0
Occupied Rental Units by Geography	8,781	0.0	35.6	64.4	0.0	0.0
Vacant Units by Geography	3,765	0.0	46.5	53.5	0.0	0.0
Businesses by Geography	3,365	0.0	31.1	68.9	0.0	0.0
Farms by Geography	431	0.0	10.2	89.8	0.0	0.0
Family Distribution by Income Level	21,116	22.3	19.8	22.2	35.6	0.0
Household Distribution by Income Level	30,279	25.6	16.5	19.7	38.2	0.0
Median Family Income Non-MSAs - OH		\$52,573	Median Housing Value			\$108,246
			Median Gross Rent			\$625
			Families Below Poverty Level			12.6%
<i>Source: 2010 U.S. Census and 2016 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.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA, 2015 ACS Census (2017-18)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.0	41.2	58.8	0.0	0.0
Population by Geography	77,771	0.0	40.9	59.1	0.0	0.0
Housing Units by Geography	34,274	0.0	40.8	59.2	0.0	0.0
Owner-Occupied Units by Geography	20,593	0.0	36.6	63.4	0.0	0.0
Occupied Rental Units by Geography	9,788	0.0	52.8	47.2	0.0	0.0
Vacant Units by Geography	3,893	0.0	32.8	67.2	0.0	0.0
Businesses by Geography	3,397	0.0	46.7	53.3	0.0	0.0
Farms by Geography	406	0.0	23.2	76.8	0.0	0.0
Family Distribution by Income Level	20,668	26.7	21.0	19.1	33.2	0.0
Household Distribution by Income Level	30,381	26.6	18.4	19.1	35.9	0.0
Median Family Income Non-MSAs - OH		\$56,217	Median Housing Value			\$104,783
			Median Gross Rent			\$670
			Families Below Poverty Level			15.3%
<i>Source: 2015 ACS Census and 2018 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.</i>						

The Non-MSA AA in Ohio includes Highland and Fayette Counties and one census tract in the western section of Ross County (9557). There are no low- or upper-income census tracts in the Non-MSA AA. As of the 2010 U.S. Census data, there are five moderate-income census tracts and 12 middle-income census tracts. The Non-MSA AA is comprised of seven moderate-income census tracts and ten middle-income census tracts, as of the 2015 ACS Census data.

The main office in Hillsboro is located in southwestern Ohio, approximately 60 miles east of Cincinnati, Ohio. Hillsboro is the largest city in Highland County and the county seat. The bank has five offices in Highland County: three in Hillsboro and two in Greenfield. Greenfield is the second largest city in Highland County. The bank has one office located in Washington Courthouse in Fayette County, which is the largest city in that county. All six offices are located in moderate-income census tracts as of the 2015 ACS Census. The majority of the bank's total deposits are in Highland County, with \$404.1 million deposits representing 64.6 percent of total deposits.

Economic conditions in the Non-MSA AA are overall stable. As of April 2019, the “not seasonally adjusted” unemployment rates for Highland, Fayette, and Ross Counties are 3.8, 2.8, and 3.3 percent, respectively. These are lower than or commensurate with the national and state of Ohio's unemployment rate of 3.3 percent. The source of the unemployment data was from the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information, as of April 2019.

The AA has a mix of companies across many industries, including manufacturing, retail, and agriculture. Large employers in Highland County include the local school systems, Greenfield Research, Wal-Mart

Stores Inc., and the Highland District Hospital. Large employers in Fayette County include the local school systems, Fayette County Memorial Hospital, Sugar Creek Packing Co., YUSA Corp., and Wal-Mart Stores, Inc. Large employers in Ross County include Adena Regional Health System, Wal-Mart Stores Inc., the local school systems, and government offices.

According to the 2010 U.S. Census data, the median housing value in the Non-MSA AA was \$108,246. Based on the 2016 median family income of \$55,400, low-income families make less than \$27,700 and moderate-income families make less than \$44,320. Overall median housing values are approximately 2.4 to 3.9 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 34,044 total housing units in the AA, of which 63.2 percent are owner-occupied and 25.8 percent are rental occupied units. Approximately 12.6 percent of the families and 16.4 percent of the households live below the poverty level.

According to the 2015 ACS Census data, the median housing value in the Non-MSA AA was 104,783. Based on the 2017 median family income of \$57,600, low-income families make less than \$28,800 and moderate-income families make less than \$46,080. Overall median housing values are approximately 2.3 to 3.6 times the annual income of LMI families in the AA. Based on the 2018 median family income of \$61,400, low-income families make less than \$30,700 and moderate-income families make less than \$49,120. Overall median housing values are approximately 2.1 to 3.4 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 34,274 total housing units in the AA, of which 60.1 percent are owner-occupied and 28.6 percent are rental occupied units. Approximately 15.3 percent of the families and 17.7 percent of the households live below the poverty level.

As part of this CRA evaluation, we conducted one interview with a representative from a local community development organization that provides affordable housing and services to LMI individuals in Highland County. The contact did not specifically state any general banking/credit needs, but stated that poverty is an issue for their clients. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Cincinnati MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cincinnati MSA AA, 2010 U.S. Census (2016)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	49	0.0	16.3	65.3	18.4	0.0
Population by Geography	242,209	0.0	13.9	68.6	17.5	0.0
Housing Units by Geography	98,754	0.0	14.6	69.6	15.8	0.0
Owner-Occupied Units by Geography	68,985	0.0	11.6	69.6	18.8	0.0
Occupied Rental Units by Geography	19,939	0.0	22.5	70.2	7.3	0.0
Vacant Units by Geography	9,830	0.0	19.4	68.7	11.9	0.0
Businesses by Geography	11,560	0.0	13.4	65.6	21.0	0.0
Farms by Geography	740	0.0	12.6	75.9	11.5	0.0
Family Distribution by Income Level	65,305	19.9	19.0	22.7	38.3	0.0

Household Distribution by Income Level	88,924	20.8	16.5	19.7	43.1	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$67,016	Median Housing Value			\$160,552
			Median Gross Rent			\$697
			Families Below Poverty Level			7.3%
<i>Source: 2010 U.S. Census and 2016 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.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cincinnati MSA AA, 2015 ACS Census (2017-18)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	49	0.0	28.6	49.0	20.4	2.0
Population by Geography	244,532	0.0	27.4	52.7	19.9	0.0
Housing Units by Geography	101,017	0.0	29.2	52.8	17.9	0.0
Owner-Occupied Units by Geography	67,713	0.0	24.4	53.8	21.8	0.0
Occupied Rental Units by Geography	23,771	0.0	39.5	51.6	9.0	0.0
Vacant Units by Geography	9,533	0.0	37.5	49.5	13.0	0.0
Businesses by Geography	11,808	0.0	26.6	50.4	23.0	0.0
Farms by Geography	704	0.0	32.0	55.0	12.9	0.1
Family Distribution by Income Level	65,289	21.3	17.9	21.9	38.8	0.0
Household Distribution by Income Level	91,484	22.7	16.1	18.3	42.9	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$70,589	Median Housing Value			\$148,223
			Median Gross Rent			\$746
			Families Below Poverty Level			8.3%
<i>Source: 2015 ACS Census and 2018 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.</i>						

The Cincinnati MSA AA includes Brown and Clermont Counties located in the Cincinnati, OH-KY-IN MSA 17140. Brown is contiguous to and west and south of Highland County. Clermont County is contiguous to and west of Brown County. Both counties are east of Cincinnati, Ohio. As of the 2015 ACS Census data, the bank has two offices located in moderate-income geographies (Mt. Orab and Georgetown) and two offices in middle-income geographies (Higginsport and Batavia). There are no low-income census tracts in the Cincinnati MSA AA. As of the 2010 U.S. Census, the Cincinnati MSA AA is comprised of eight moderate-income census tracts, 32 middle-income census tracts, and nine upper-income census tracts. The Cincinnati MSA AA is comprised of 14 moderate-income census tracts, 24 middle-income census tracts, and ten upper-income census tracts, as of the 2015 ACS U.S. Census data.

Georgetown is the largest city in Brown County and the county seat. The bank has three offices in Brown County: Georgetown, Mt. Orab, and Higginsport. The largest areas in Clermont County include

Union Township and Miami Township, followed by Batavia. Batavia is the county seat. The bank has one office located in Clermont County (Batavia). The bank's total deposits in the Cincinnati MSA AA totaled \$101.0 million, representing 16.1 percent of total deposits.

Economic conditions in the Cincinnati MSA AA are stable. As of April 2019, the "not seasonally adjusted" unemployment rates for Brown and Clermont Counties are 3.7 and 2.8 percent, respectively. These are lower than or commensurate with the national and State of Ohio's unemployment rate of 3.3 percent. The source of the unemployment data was from the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information, as of April 2019.

The AA is diversified, with manufacturing, health services, and retail industries. Large employers in Brown County include Milacron, Southern State Community College, the local schools systems, and county government offices. Large employers in Clermont County include Total Quality Logistics, Tata Consultancy Services, American Modern Insurance Group, and Milacron Plastics Technologies.

According to the 2010 U.S. Census data, the median housing value in the Cincinnati MSA AA was \$160,552. Based on the 2016 median family income of \$68,800, low-income families make less than \$34,400 and moderate-income families make less than \$55,040. Overall median housing values are approximately 2.9 to 4.7 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 98,754 total housing units in the AA, of which 69.9 percent are owner-occupied and 20.2 percent are rental occupied units. Approximately 7.3 percent of the families and 9.7 percent of the households live below the poverty level.

According to the 2015 ACS Census data, the median housing value in the Cincinnati MSA AA was \$148,223. Based on the 2017 median family income of \$73,600, low-income families make less than \$36,800 and moderate-income families make less than \$58,880. Overall median housing values are approximately 2.5 to 4.0 times the annual income of LMI families in the AA. Based on the 2018 median family income of \$77,000, low-income families make less than \$38,500 and moderate-income families make less than \$61,600. Overall median housing values are approximately 2.4 to 3.9 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 101,017 total housing units in the AA, of which 67.0 percent are owner-occupied and 23.5 percent are rental occupied units. Approximately 8.3 percent of the families and 10.5 percent of the household live below the poverty level.

In addition, we conducted one interview with a representative from a local affordable housing organization that provide services to LMI individuals in Brown and Adams County. Affordable housing is a credit need in the community. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Scope of Evaluation in Ohio

We conducted full-scope reviews of the Non-MSA AA and the Cincinnati MSA AA to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The Non-MSA AA includes Highland, Fayette, and one geography in Ross County. These counties were combined, analyzed, and presented as one AA for purposes of this evaluation. The Cincinnati MSA AA includes Brown and Clermont Counties. These counties were combined, analyzed, and presented as one AA for the purposes of this evaluation. Consumer, home mortgage, and small loans to businesses are the

bank's primary lending products and were evaluated under the Lending Test. We analyzed lending activity in full-year increments during the evaluation period, January 1, 2016 to December 31, 2018. The review included all home mortgage loans reported in the HMDA Loan Application Registers for 2016, 2017, and 2018. We completed transaction testing on a random sample of 20 consumer and 20 small loans to businesses originated/purchased in 2016 for each full-scope AA. In addition, we completed transaction testing on a random sample of 20 consumer and 20 small loans to businesses originated/purchased in 2017-2018 for each full-scope AA. We selected the Non-MSA AA and the Cincinnati MSA AA for full-scope reviews due to the volume of deposits in these two AAs and the significant lending volume in these AAs as well. We completed limited-scope reviews for the other two AAs.

Refer to appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

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

Based on full- and limited-scope reviews, the bank's lending performance in the state of Ohio is excellent.

Distribution of Loans by Income Level of the Geography

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

In 2016, as of the 2010 U.S. Census data, the bank had no low-income census tracts in the Non-MSA AA, Cincinnati MSA AA, or the Columbus MSA AA. The bank had five moderate-income census tracts in the Non-MSA AA, eight in the Cincinnati MSA AA, and one in the Columbus MSA AA. For the Springfield MSA AA, there were six low-income census tracts and nine moderate-income census tracts.

In 2018, as of the 2015 ACS Census data, the bank had no low-income census tracts in the Non-MSA AA, Cincinnati MSA AA, or the Columbus MSA AA. The bank had seven moderate-income census tracts in the Non-MSA AA, 14 in the Cincinnati MSA AA, and three in the Columbus MSA AA. For the Springfield MSA AA, there were four low-income census tracts and 12 moderate-income census tracts.

The lending analysis reflected lending in most areas, with no conspicuous gaps in lending.

Home Mortgage Loans

Refer to Table O in the state of 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.

The bank exhibits excellent geographic distribution of home mortgage loans in the AAs. The bank's lending in 2016 in the Non-MSA AA and the Cincinnati MSA AA reflects excellent distribution. The bank originated or purchased 24.2 percent of the loans in the Non-MSA AA in

moderate-income census tracts, which exceeds the percentage of home mortgage loans of other home mortgage lenders (aggregate data). The bank originated or purchased 23.1 percent of the loans in the Cincinnati MSA AA in moderate-income census tracts, which significantly exceeds both aggregate and demographic data.

The bank's lending in 2017 – 2018 in the Non-MSA AA and the Cincinnati MSA AA reflects excellent distribution. The bank originated or purchased 43.5 percent of the loans in the Non-MSA AA in moderate-income census tracts, which exceeds both aggregate and demographic data. The bank originated or purchased 60.7 percent of the loans in the Cincinnati MSA AA in moderate-income census tracts, which significantly exceeds both aggregate and demographic data.

Small Loans to Businesses

Refer to Table Q in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank exhibits excellent geographic distribution of small loans to businesses in the AAs.

The bank's small business lending in 2016 in the Non-MSA AA and the Cincinnati MSA AA reflects excellent distribution. The bank originated or purchased 30.0 percent of the loans in our sample in the Non-MSA AA in moderate-income census tracts, which exceeds aggregate data. The bank originated or purchased 30.0 percent of the loans in our sample in the Cincinnati MSA AA in moderate-income census tracts, which significantly exceeds both aggregate and demographic data.

The bank's small business lending in 2017 – 2018 in the Non-MSA AA and the Cincinnati MSA AA reflects excellent distribution. The bank originated or purchased 60.0 percent of the loans in our sample in the Non-MSA AA in moderate-income census tracts, which significantly exceeds both aggregate and demographic data. The bank originated or purchased 55.0 percent of the loans in our sample in the Cincinnati MSA AA in moderate-income census tracts, which significantly exceeds both aggregate and demographic data.

Consumer Loans

Refer to Table U in the state of 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.

The bank exhibits excellent geographic distribution of consumer loans in the AAs.

The bank's consumer lending in 2016 in the Non-MSA AA and the Cincinnati MSA AA reflects excellent distribution. The bank originated or purchased 35.0 percent of the loans in our sample in the Non-MSA AA in moderate-income census tracts, which exceeds demographic data. The bank originated or purchased 25.0 percent of the loans in our sample in the Cincinnati MSA AA in moderate-income census tracts, which significantly exceeds demographic data.

The bank's consumer lending in 2017 – 2018 in the Non-MSA AA and the Cincinnati MSA AA reflects overall excellent distribution. The bank originated or purchased 40.0 percent of the loans in our sample in the Non-MSA AA in moderate-income census tracts, which is just slightly below the demographic

data of 41.8 percent. The bank originated or purchased 60.0 percent of the loans in our sample in the Cincinnati MSA AA in moderate-income census tracts, which significantly exceeds demographic data of 28.3 percent.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of 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.

The bank exhibits reasonable distribution of home mortgage loans to individuals of different income levels in the AAs.

The bank's home mortgage lending to LMI borrowers in 2016 in the Non-MSA AA is reasonable. MNB's lending to low-income borrowers in the Non-MSA AA was 5.1 percent, which is reasonable when compared to the aggregate data of 7.2 percent. MNB's lending to moderate-income borrowers in the Non-MSA AA was 15.7 percent, which is reasonable when compared to the aggregate data of 22.6 percent and demographic data of 19.8 percent. We noted that the 12.6 percent of families below the poverty level in the Non-MSA AA in 2016 may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards. We also considered the median price of housing in the AA relative to the maximum income of LMI borrowers, which may demonstrate a barrier to homeownership. Refer to the "Description of Institution's Operations in Ohio" for more details on the median price of housing.

The bank's home mortgage lending to LMI borrowers in 2016 in the Cincinnati MSA AA is reasonable. MNB's lending to low-income borrowers in the Cincinnati MSA AA is excellent and exceeds aggregate data. The bank's lending to moderate-income borrowers in the Cincinnati MSA AA is reasonable, as the percentage of lending is commensurate with aggregate and demographic data.

The bank's home mortgage lending to LMI borrowers in 2017 – 2018 in the Non-MSA AA is reasonable, as the bank's percentages are commensurate with aggregate and/or demographic data.

The bank's home mortgage lending to LMI borrowers in 2017 – 2018 in the Cincinnati MSA AA is reasonable. MNB's lending to low-income borrowers is slightly below aggregate data; however the bank's lending to moderate-income borrowers exceeds demographic data and is just slightly below aggregate data.

Small Loans to Businesses

Refer to Table R in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The bank exhibits excellent distribution of small loans to businesses of different sizes in the AAs.

The bank lending to small businesses in 2016 in the Non-MSA AA is excellent. In our sample, the bank originated 75.0 percent of the loans to businesses with annual gross revenues less than \$1 million, which compares favorably with the aggregate data of 47.1 percent. For the Cincinnati MSA AA, the bank originated 90.0 percent of the loans in our sample to businesses with annual gross revenues less than \$1 million, which compares favorably with the aggregate data of 51.2 percent and demographic data of 83.4 percent.

The bank lending to small businesses in 2017 – 2018 in the Non-MSA AA is excellent. In our sample, the bank originated 90.0 percent of the loans to businesses with annual gross revenues less than \$1 million, which compares favorably with the aggregate data of 50.3 percent and demographic data of 77.2 percent. For the Cincinnati MSA AA, the bank originated 70.0 percent of the loans in our sample to businesses with annual gross revenues less than \$1 million, which compares favorably with the aggregate data of 53.8 percent.

Consumer Loans

Refer to Table V in the state of 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.

The bank exhibits excellent distribution of consumer loans to individuals of different income levels in the Non-MSA AA and Cincinnati MSA AA.

The bank's consumer lending to LMI borrowers in 2016 in the Non-MSA AA is excellent. MNB's lending to low-income borrowers in the Non-MSA AA was 20.0 percent, which is reasonable when compared to the demographic data of 25.6 percent. MNB's lending to moderate-income borrowers in the Non-MSA AA was 35.0 percent, which compares favorably to the demographic data of 16.5 percent. We noted that the 16.4 percent of households below the poverty level in the Non-MSA AA in 2016 may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards.

The bank's consumer lending to LMI borrowers in 2016 in the Cincinnati MSA AA is excellent. MNB's lending to low-income borrowers in the Cincinnati MSA AA was 20.0 percent, which is excellent when compared to the demographic data of 20.8 percent given that 9.7 percent of households live below poverty. MNB's lending to moderate-income borrowers in the Cincinnati MSA AA was 35.0 percent, which exceeds the demographic data of 16.5 percent.

The bank's consumer lending to LMI borrowers in 2017 – 2018 in the Non-MSA AA is reasonable. MNB's lending to low-income borrowers in the Non-MSA AA was 20.0 percent, which is reasonable when compared to the demographic data of 26.6 percent. MNB's lending to moderate-income borrowers in the Non-MSA AA was 10.0 percent, which is below the demographic data. We noted that the 17.7 percent of households below the poverty level in the Non-MSA AA in 2018 may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards.

The bank's consumer lending to LMI borrowers in 2017 – 2018 in the Cincinnati MSA AA is excellent. MNB's lending to LMI borrowers in the Cincinnati MSA AA exceeds the demographic data.

Responses to Complaints

MNB has not received any complaints about its performance in helping to meet the AAs' credit needs during the evaluation period.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the state of Ohio is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

The bank's lending in the Columbus MSA AA is consistent with the full-scope areas. The bank's lending to LMI borrowers in the Columbus MSA AA exceeds aggregate data for 2016. For 2017, the bank's level of lending to moderate-income borrowers exceeds aggregate and demographic data, and is commensurate with aggregate data for low-income borrowers. The bank's small business lending in moderate-income census tracts exceeds both aggregate and demographic data for both 2016 and 2017 – 2018. The bank's lending to businesses with annual gross revenues under \$1 million is excellent, as the bank's percentages in our sample exceed aggregate and demographic data for both 2016 and 2017 – 2018. MNB's lending to LMI borrowers in the consumer loan sample is excellent.

The bank originated or purchased less than 20 consumer, home mortgage, and small loans to businesses in the Springfield MSA AA during each year in the evaluation period per loan product type. Therefore, a geographic and borrower distribution analyses of the Springfield MSA AA is not meaningful. The tables in appendix D include the data for the Springfield MSA AA for reference purposes only. The data does not provide for a meaningful analysis and is not included in the rating.

COMMUNITY DEVELOPMENT TEST

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

Based on full-scope and limited-scope reviews, the bank exhibits adequate responsiveness to community development needs in the state of Ohio 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 AAs.

Number and Amount of Community Development Loans

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

MNB's responsiveness to CD lending is excellent and reflects outstanding performance. During this evaluation period, the bank made a total of 16 CD loan originations or renewals, totaling over \$3.4 million.

In the Non-MSA AA, the bank originated or renewed eight CD loans to four different organizations totaling \$1.8 million during the evaluation period. This indicates excellent responsiveness to the CD needs of the community. The bank made several loans to organizations who provide housing assistance to LMI individuals with disabilities.

In the Cincinnati MSA AA, the bank originated or renewed four CD loans to one borrower totaling \$1.1 million during the evaluation period. This indicates excellent responsiveness to the CD needs of the community. The borrower provides affordable housing and services to LMI individuals.

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)
Non-MSA AA	0	\$0	31	\$14,489	31	63.3%	\$14,489	71.9%	0	\$0
Cincinnati MSA AA	0	\$0	14	\$3,950	14	28.6%	\$3,950	19.6%	0	\$0
Columbus MSA AA	0	\$0	4	\$1,700	4	8.1%	\$1,700	8.5%	0	\$0
Springfield MSA AA	0	\$0	0	\$0	0	0.0%	\$0	0.0%	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's qualified CD investment activity is adequate. The bank made a total of 49 qualified donations totaling \$20,139 during the current evaluation period.

In the Non-MSA AA, the bank's level of CD investments is adequate given the asset size and the capacity of the bank in this AA. During the evaluation period, MNB made 31 donations totaling \$14,489 in the Non-MSA AA. MNB donated approximately \$8,500 to the Highland County Society for Children and Adults. This organization provides assistance and health services to Highland County residents who are primarily LMI individuals or families who need help with expenses for necessary medical treatments, transportation to hospitals, and health equipment and devices. In addition, the bank made donations to local food pantries and organizations that provide services to LMI individuals.

In the Cincinnati MSA AA, the bank's level of CD investments is adequate given the asset size and the capacity of the bank in this AA. The bank made 14 donations totaling \$3,950 during the evaluation period in the Cincinnati MSA AA. MNB donated approximately \$1,700 to Backpack Blessings. This organization provides food to LMI children on the weekends. In addition, the bank made donations to local homeless shelters and food pantries.

Extent to Which the Bank Provides Community Development Services

CD services provided by the bank represent adequate responsiveness to CD needs within the AA. Bank officers and employees are involved in approximately 30 organizations that serve LMI individuals and areas. Officers and employees serve on boards or in other roles at many CD organizations, providing technical assistance and expertise. Positions held by bank officers and employees include, but are not

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

limited to: treasurer, chairperson, board member, vice president, and ambassador.

Various MNB officers and directors serve on major community groups that are active in providing affordable housing needs and services to LMI individuals, or promoting economic development within the community. Some of the organizations that employees serve include, but are not limited to, the following: Highland County Metropolitan Housing Authority, Highland Housing Services, Highland County Society for Children and Adults, and Turning Point Adult Alternative Learning Center.

MNB is actively involved in several school programs that serve LMI individuals in moderate-income areas. Bank employees participate in the “My Money, My World” program at Hillsboro City Schools, which teaches budgeting to “at-risk” students. In addition, MNB has a school savings program at the Hillsboro schools that is conducted on a weekly basis. Bank employees have also assisted with the Junior Achievement Program, “Our Nation,” which introduces students to work readiness and the demands of the job market. The Hillsboro City Schools are located in a moderate-income census tract.

In addition to outside service, MNB offers several products and services targeted to serving LMI individuals. MNB participates in the Federal Home Loan Bank of Cincinnati’s (FHLBC) “Welcome Home Program,” which provides down payment assistance to borrowers who meet the income criteria. MNB is a member of FHLBC; therefore, is permitted to use these grants to assist borrowers. MNB offers a free checking account, which is a no service fee checking account targeted to LMI customers. MNB also assists Habitat for Humanity (Highland County) by servicing the organization’s loan payments and providing financial reporting free of charge.

MNB’s responsiveness to CD needs in the Non-MSA AA through CD services is adequate. MNB’s delivery systems are accessible to geographies and individuals throughout this AA. There are six banking offices located in moderate-income census tracts in the Non-MSA AA. No branches have been closed since the last CRA evaluation. There are more than ten officers and employees that provide CD services to multiple CD organizations. See above for a description of CD activities by bank officers and employees.

MNB’s responsiveness to CD needs in the Cincinnati MSA AA through CD services is adequate. MNB’s delivery systems are accessible to geographies and individuals throughout this AA. There are two banking offices located in moderate-income geographies in the Cincinnati MSA AA. One bank employee is actively involved with CD services to several CD organizations in the Cincinnati MSA AA.

See above for a description of CD activities by bank officers and employees.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited scope reviews, the bank’s performance under the CD Test in the Columbus MSA AA and Springfield MSA AA is consistent with the bank’s overall performance under the CD test in the full- scope areas.

In the Columbus MSA AA, the bank did not originate or renew any CD loans within the evaluation period. The bank has a small footprint in this AA; therefore, CD lending opportunities are limited. The bank’s level of CD investments is adequate given the asset size and the capacity of the bank in the Columbus MSA AA. The bank made four donations totaling \$1,700 during the evaluation period. The

bank donated \$500 to Help House Community Outreach, a local food pantry in Madison County, as well as donations to other organizations that provide services to LMI individuals. MNB's responsiveness to CD needs in the Columbus MSA AA through CD services is adequate. MNB's delivery systems are accessible to geographies and individuals throughout the AA. There is one banking office located in a moderate-income census tract in the Columbus MSA AA. The CD needs of the community are adequately served by the bank through qualified investments.

In the Springfield MSA AA, the bank originated or renewed four CD loans to one borrower totaling \$476,491 during the evaluation period. This indicates excellent responsiveness to the CD needs of the community. The borrower is a non-profit organization that provides housing assistance to LMI individuals with disabilities. The bank did not make any qualified investments within the Springfield MSA AA during the evaluation period. The bank has a small footprint in this AA; therefore, investment opportunities may be limited. MNB's responsiveness to CD needs in the Springfield MSA AA through CD services is adequate. MNB's delivery systems are accessible to geographies and individuals throughout the AA. The Springfield office is located in a middle-income census tract. One employee in the Springfield office is active in CD service activities in this AA. The CD needs of the community are adequately served by the bank through qualified lending and services.

Appendix A: Scope of Examination

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”.

Time Period Reviewed:	01/01/2016 – 12/31/2018	
Bank Products Reviewed:	Home mortgage loans, small loans to businesses, and consumer loans CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
Non-MSA AA	Full-scope	Entire Counties of Highland and Fayette and census tract 9557 in Ross County.
Cincinnati MSA AA	Full-scope	Entire Counties of Brown and Clermont.
Columbus MSA AA	Limited-scope	Entire Counties of Madison and Union.
Springfield MSA AA	Limited-scope	The following census tracts in Clark County: 2, 3, 4, 5, 6, 7, 9.01, 9.02, 10, 11.01, 11.02, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22, 23.01, 24.03, 24.04, 25.01, 25.02, 26.02, 26.05, 26.06, 30.02, 32, 33.01, 33.02, 34, and 37.

Appendix B: Summary of State Ratings

RATINGS: MERCHANTS NATIONAL BANK			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
MERCANTS NATIONAL BANK	Outstanding	Satisfactory	Outstanding
State:			
OHIO	Outstanding	Satisfactory	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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 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 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.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% 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	
Non-MSA AA	236	34,548	100.0	1,774	0.0	0.0	0.0	25.1	24.2	21.3	74.9	75.8	78.7	0.0	0.0	0.0	0.0	0.0	0.0	
Cincinnati MSA AA	52	10,012	100.0	8,823	0.0	0.0	0.0	11.6	23.1	9.8	69.6	76.9	66.9	18.8	0.0	23.3	0.0	0.0	0.0	
Columbus MSA AA	44	5,747	100.0	4,054	0.0	0.0	0.0	3.9	2.3	6.1	61.1	84.1	45.6	35.0	13.6	48.3	0.0	0.0	0.0	
Springfield MSA AA	14	2,167	100.0	2,635	6.7	7.1	3.5	17.7	0.0	14.6	41.8	28.6	43.7	33.7	64.3	38.2	0.0	0.0	0.0	

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% 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	
Non-MSA AA	400	48,206	100.0	1,733	0.0	0.0	0.0	36.6	43.5	39.3	63.4	56.5	60.7	0.0	0.0	0.0	0.0	0.0	0.0	
Cincinnati MSA AA	145	22,541	100.0	8,114	0.0	0.0	0.0	24.4	60.7	21.1	53.8	38.6	54.5	21.8	0.7	24.4	0.0	0.0	0.0	
Columbus MSA AA	105	18,270	100.0	3,985	0.0	0.0	0.0	12.8	11.4	13.5	65.0	81.0	52.2	22.2	7.6	34.3	0.0	0.0	0.0	
Springfield MSA AA	17	2,542	100.0	2,552	4.2	5.9	1.6	21.5	11.8	19.2	43.7	41.2	46.2	30.7	41.2	33.0	0.0	0.0	0.0	

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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Non-MSA AA	236	34,548	100.0	1,774	22.3	5.1	7.2	19.8	15.7	22.6	22.2	25.4	22.6	35.6	46.6	30.3	0.0	7.2	17.2	
Cincinnati MSA AA	52	10,012	100.0	8,823	19.9	9.6	8.0	19.0	15.4	19.5	22.7	21.2	19.9	38.3	50.0	34.8	0.0	3.8	17.8	
Columbus MSA AA	44	5,747	100.0	4,054	16.9	9.1	5.5	16.7	25.0	14.9	22.1	18.2	20.4	44.3	43.2	46.5	0.0	4.5	12.7	
Springfield MSA AA	14	2,167	100.0	2,635	22.1	0.0	8.0	17.4	14.3	18.3	22.2	14.3	19.2	38.4	35.7	26.3	0.0	35.7	28.1	

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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																			2017-18	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Non-MSA AA	400	48,206	100.0	1,733	26.7	8.3	10.4	21.0	20.0	23.5	19.1	24.8	24.4	33.2	41.8	27.5	0.0	5.3	14.1	
Cincinnati MSA AA	145	22,541	100.0	8,114	21.3	9.7	10.8	17.9	20.0	22.0	21.9	24.8	23.1	38.8	43.4	30.5	0.0	2.1	13.5	
Columbus MSA AA	105	18,270	100.0	3,985	17.9	5.7	6.4	17.1	21.0	18.2	21.5	29.5	22.6	43.5	41.9	40.6	0.0	1.9	12.2	
Springfield MSA AA	17	2,542	100.0	2,552	22.6	5.9	12.1	16.7	11.8	24.1	20.7	35.3	23.8	40.0	41.2	26.6	0.0	5.9	13.4	

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA AA	20	1,098	100.0	628	0.0	0.0	0.0	31.1	30.0	27.1	68.9	70.0	72.9	0.0	0.0	0.0	0.0	0.0	0.0
Cincinnati MSA AA	20	3,271	100.0	3,655	0.0	0.0	0.0	13.4	30.0	10.5	65.6	70.0	60.5	21.0	0.0	29.0	0.0	0.0	0.0
Columbus MSA AA	20	2,440	100.0	1,284	0.0	0.0	0.0	7.8	10.0	8.2	58.0	70.0	45.6	34.2	20.0	46.2	0.0	0.0	0.0
Springfield MSA AA	8	487	100.0	1,133	11.6	0.0	9.9	24.3	12.5	21.8	29.5	37.5	28.3	34.5	50.0	40.0	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Bank data based on a sample of 20 small business loans, except for the Springfield MSA AA which includes all small business loans originated in 2016.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA AA	20	1,397	100.0	592	0.0	0.0	0.0	46.7	60.0	41.7	53.3	40.0	58.3	0.0	0.0	0.0	0.0	0.0	0.0
Cincinnati MSA AA	20	2,386	100.0	3,407	0.0	0.0	0.0	26.6	55.0	22.9	50.4	45.0	50.0	23.0	0.0	27.0	0.0	0.0	0.0
Columbus MSA AA	20	2,960	100.0	1,318	0.0	0.0	0.0	15.6	35.0	11.0	57.8	60.0	49.7	26.6	5.0	39.3	0.0	0.0	0.0
Springfield MSA AA	18	2,725	100.0	1,187	6.5	0.0	5.6	28.8	16.7	29.2	34.8	50.0	33.9	29.8	33.3	31.3	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Bank data based on a sample of 20 small business loans, except for the Springfield MSA AA which includes all small business loans originated in 2017 - 2018.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Non-MSA AA	20	1,098	100.0	628	78.8	75.0	47.1	4.5	25.0	16.8	0.0	
Cincinnati MSA AA	20	3,271	100.0	3,655	83.4	90.0	51.2	5.3	10.0	11.4	0.0	
Columbus MSA AA	20	2,440	100.0	1,284	81.2	90.0	41.4	6.1	10.0	12.7	0.0	
Springfield MSA AA	8	487	100.0	1,133	76.8	87.5	52.5	6.8	12.5	16.4	0.0	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0. Bank data based on a sample of 20 small business loans, except for the Springfield MSA AA which includes all small business loans originated in 2016.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Non-MSA AA	20	1,397	100.0	592	77.2	90.0	50.3	4.7	10.0	18.1	0.0	
Cincinnati MSA AA	20	2,386	100.0	3,407	82.6	70.0	53.8	5.4	30.0	12.0	0.0	
Columbus MSA AA	20	2,960	100.0	1,318	80.9	90.0	48.8	6.2	10.0	12.9	0.0	
Springfield MSA AA	18	2,725	100.0	1,187	75.4	83.3	54.8	7.3	16.7	17.3	0.0	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0. Bank data based on a sample of 20 small business loans, except for the Springfield MSA AA which includes all small business loans originated in 2017 – 2018.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2016	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA AA	20	384	100.0	0.0	0.0	28.1	35.0	71.9	65.0	0.0	0.0	0.0	0.0	
Cincinnati MSA AA	20	383	100.0	0.0	0.0	14.1	25.0	69.7	75.0	16.2	0.0	0.0	0.0	
Columbus MSA AA	20	276	100.0	0.0	0.0	7.1	5.0	64.5	95.0	28.4	0.0	0.0	0.0	
Springfield MSA AA	5	53	100.0	12.8	0.0	21.4	20.0	38.8	20.0	27.1	60.0	0.0	0.0	

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0.
Bank data based on a sample of 20 consumer loans, except for the Springfield MSA AA which includes all consumer loans originated in 2016.*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-18	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA AA	20	456	100.0	0.0	0.0	41.8	40.0	58.2	60.0	0.0	0.0	0.0	0.0	
Cincinnati MSA AA	20	270	100.0	0.0	0.0	28.3	60.0	53.2	40.0	18.4	0.0	0.0	0.0	
Columbus MSA AA	20	310	100.0	0.0	0.0	16.0	10.0	65.4	80.0	18.5	10.0	0.0	0.0	
Springfield MSA AA	8	93	100.0	8.7	0.0	28.0	25.0	37.9	50.0	25.4	25.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0.
Bank data based on a sample of 20 consumer loans, except for the Springfield MSA AA which includes all consumer loans originated in 2017 – 2018.*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA AA	20	384	100.0	25.6	20.0	16.5	35.0	19.7	30.0	38.2	15.0	0.0	0.0	
Cincinnati MSA AA	20	383	100.0	20.8	20.0	16.5	35.0	19.7	25.0	43.1	20.0	0.0	0.0	
Columbus MSA AA	20	276	100.0	20.2	25.0	14.5	45.0	17.0	20.0	48.3	10.0	0.0	0.0	
Springfield MSA AA	5	53	100.0	25.6	20.0	16.3	40.0	18.5	20.0	39.5	0.0	0.0	20.0	

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0
Bank data based on a sample of 20 consumer loans, except for the Springfield MSA AA which includes all consumer loans originated in 2016.*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-18	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA AA	20	456	100.0	26.6	20.0	18.4	10.0	19.1	25.0	35.9	45.0	0.0	0.0	
Cincinnati MSA AA	20	270	100.0	22.7	30.0	16.1	20.0	18.3	20.0	42.9	25.0	0.0	0.0	
Columbus MSA AA	20	310	100.0	19.1	10.0	16.5	35.0	17.4	25.0	47.0	25.0	0.0	5.0	
Springfield MSA AA	8	93	100.0	26.0	0.0	16.5	50.0	16.9	12.5	40.6	37.5	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0
Bank data based on a sample of 20 consumer loans, except for the Springfield MSA AA which includes all consumer loans originated in 2017 – 2018.*