



## **PUBLIC DISCLOSURE**

October 24, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Citizens Federal Savings & Loan Association  
Charter Number 700375

433 Madison Avenue  
Covington, KY 41011-1519

Office of the Comptroller of the Currency

Central Ohio – Indiana Office  
Westlake Center  
4555 Lake Forrest Drive, Suite 520  
Blue Ash, OH 45242-3760

**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 major factors that support this rating include:

- The Lending Test rating is based on excellent performance in the State of Kentucky. Citizens Federal Savings and Loan Association’s (Citizens or bank) originated a substantial majority of loans in its assessment area (AA) with an excellent geographic distribution among low- and moderate-income (LMI) geographies. In addition, Citizens participated in a community development loan that was responsive to affordable housing needs of LMI individuals.

### Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AA, the bank’s loan-to-deposit (LTD) ratio is more than reasonable. Citizens quarterly LTD ratio, as calculated on a bank-wide basis, averaged 94.4 percent over the 20-quarter period ending December 31, 2021. During this timeframe, the LTD ratio ranged from 85.7 percent to 108.3 percent. Citizens’ LTD ratio was the highest among the three banks with an office in the AA and headquartered in Kentucky. The average LTD ratio for the other two banks was 73.2 percent and 73.3 percent.

### Lending in Assessment Area

A substantial majority of the bank’s loans are inside its assessment area (AA). The bank originated and purchased 82.1 percent of its total loans inside the bank’s AA 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 table below summarizes the number and dollar volume of lending inside and outside the bank’s AA for the bank’s primary loan product, home mortgage loans. Examiners verified and analyzed loan data on all home mortgage loans originated and purchased between January 1, 2019, and December 31, 2021.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	64	82.1	14	17.9	78	13,215	78.5	3,617	21.5	16,832
<b>Total</b>	<b>64</b>	<b>82.1</b>	<b>14</b>	<b>17.9</b>	<b>78</b>	<b>13,215</b>	<b>78.5</b>	<b>3,617</b>	<b>21.5</b>	<b>16,832</b>

### Description of Institution

Citizens is a federally chartered, mutual savings association that operates from a single office in Covington, Kentucky. Citizens does not have a holding company or any subsidiaries and did not conduct any merger/acquisition activity during the evaluation period. As of June 30, 2022, Citizens had total

assets of \$40.4 million, which makes it one of the smallest financial institutions taking deposits and making loans in its AA. The AA consists of a two-county area that includes Kenton and Boone County. Citizens' office is located in Kenton County and the substantial portion of its loans are originated or purchased from within Kenton County or Boone County. Boone County is adjacent to Kenton County; both counties are part of the Cincinnati OH-KY-IN MSA.

Citizens is a traditional, savings and loan association that primarily accepts customer deposits and originates residential real estate loans for its portfolio. Residential loan products consist of conventional fixed- and adjustable-rate first and second home mortgage loans to purchase, refinance, improve, or construct/rehabilitate one-to-four family homes. Other available consumer loan products include home equity loans and loans secured by customer deposits. Occasionally, Citizens also participates in real estate loans secured by multi-family property or commercial real estate. Deposit products are also typical for a small financial institution. Time deposits make up most of Citizens' deposit accounts, but checking, other savings, and individual retirement accounts are available as well. In addition to loan and deposit products, Citizens offers money orders.

As of June 30, 2022, Citizens' tier one capital totaled \$11.4 million. Total deposits equaled \$25.6 million or 63.4 percent of total assets. Gross loans and leases of \$27 million represented 66.9 percent of total assets. Loan originations and loan portfolio composition reflect Citizens' focus on residential real estate lending. As of June 30, 2022, outstanding home mortgage loans are 96.6 percent of total loans. Lending activity during the evaluation period (2019-2021) was also heavily concentrated in residential real estate. Home mortgage loans for the purchase, refinance, or improvement of one-to-four family owner-occupied or rental homes accounted for 96.3 percent of total number of loan originations and purchases. As a result, home mortgage loans secured by one-to-four family residences are considered the sole primary loan product.

Citizens' lending activities are consistent with its size, expertise, financial capability, and local economic conditions. There are no legal, financial, or other factors that affect its ability to help meet the credit needs of its AA. Citizens received a Satisfactory rating for its CRA performance during the prior evaluation period; this rating was reported in OCC's CRA Evaluation dated September 17, 2018.

## **Scope of the Evaluation**

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

This evaluation considers Citizens' CRA performance during the three-year period from January 1, 2019, to December 31, 2021. Examiners reviewed loan documents to gather the necessary data on the bank's primary loan product, home mortgage loans. The data from all home mortgage loans originated and purchased by the bank during the evaluation period was considered. There is no affiliate activity included in this analysis.

OCC evaluated Citizens' CRA performance using the Interagency Small Bank examination procedures. These procedures comprise the Lending Test and include the following performance criteria:

- the LTD ratio,
- percentage of originated and purchased loans made inside the AAs,
- lending to borrowers of different income levels and/or businesses of different sizes,
- lending in low- and moderate-income areas within the AAs, and

- the bank's record of taking action on written complaints regarding its performance in helping meet the credit needs of the AA.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. 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. Citizens operates in a single state, so its overall rating is determined by the rating for the State of Kentucky. The State of Kentucky rating is based on Citizens' performance in its only AA, the Cincinnati MSA AA.

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

Pursuant to 12 CFR 25.28(c), 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 Consumer Financial Protection Bureau, 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 Kentucky

**CRA rating for the State of Kentucky<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

The major factors that support this rating include:

- the excellent geographic distribution of home mortgage loans,
- the positive impact of a responsive community development loan,
- a substantial majority of loans originated inside the assessment area, and
- a more than reasonable loan-to-deposit ratio.

### Description of Institution’s Operations in Kentucky

Citizens has one office that primarily serves Kenton and Boone counties in north central Kentucky. Both counties are part of the Cincinnati OH-KY-IN MSA. These two counties comprise Citizens only AA, the Cincinnati MSA AA. Refer to the “Description of Institution” section above for more details on Citizens’ operations. The AA meets the requirements of CRA and does not arbitrarily exclude any LMI geographies.

#### Cincinnati MSA AA

The table and comments that follow provide demographic data and additional information regarding employment, housing cost, competition, and credit needs in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cincinnati MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	63	12.7	19.0	42.9	23.8	1.6
Population by Geography	287,624	8.4	15.6	47.9	28.0	0.0
Housing Units by Geography	116,835	9.7	17.2	48.5	24.6	0.0
Owner-Occupied Units by Geography	73,741	5.3	13.5	49.7	31.5	0.0
Occupied Rental Units by Geography	33,193	16.6	23.5	47.2	12.8	0.0
Vacant Units by Geography	9,901	18.8	24.3	44.6	12.2	0.0

<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Businesses by Geography	24,856	6.1	19.5	45.4	28.8	0.2
Farms by Geography	770	5.6	12.2	51.4	30.8	0.0
Family Distribution by Income Level	73,858	20.0	17.1	21.6	41.3	0.0
Household Distribution by Income Level	106,934	21.8	14.9	18.6	44.6	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$69,949	Median Housing Value			\$155,665
FFIEC Updated Median Family Income		\$81,900	Median Gross Rent			\$810
			Families Below Poverty Level			9.5%
<i>Source: 2015 ACS and 2021 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>						

### Job Market

Business demographic data from Dunn & Bradstreet (2021) indicates the primary industries in the two-county AA are services (36 percent), finance, insurance, and real estate (12 percent), and retail trade (10.9 percent). In addition, a notable percentage of establishments are categorized as non-classifiable (20.5 percent). The major employers in the northern Kentucky area include St. Elizabeth Healthcare, Amazon, Fidelity Investments, Kroger, and Boone County School District.

The annual unemployment rate in Kenton and Boone Counties compares favorably to the statewide rate and has been relatively stable during the evaluation period. However, the annual rate for 2020 was adversely impacted by the COVID-19 pandemic and was approximately two percent higher than in 2019. Both counties experienced a significant spike in unemployment during April and May of 2020 followed by a notable decline in June 2020 and gradual recovery thereafter for the remainder of the year.

Unemployment Rates					
	2019	2020	2021	High	Low
Boone County	3.2%	5.2%	3.8%	12.6%	3.0%
Kenton County	3.4%	5.6%	4.2%	13.4%	3.2%
State of Kentucky	4.1%	6.4%	4.7%	16.1%	3.4%
<i>Source: Bureau of Labor Statistics (Not Seasonally Adjusted)</i>					

### Affordable Housing Cost

A home mortgage loan is not necessarily affordable for all LMI families in the AA. According to 2015 ACS U.S. Census data, the median housing value in the AA was \$155,665. Low-income families make less than \$40,950 and moderate-income families make less than \$65,520 based on the 2021 FFIEC Updated MFI. Median housing values are at least 3.8 times the annual income of low-income families and 2.4 times the annual income of moderate-income families. The housing cost relative to income may have a limiting effect on mortgage demand for some LMI families when also considering the down payment requirement, homeowner costs such as taxes and insurance, and other debt payments. The median age of housing stock is approximately 43 years overall and 61 years in moderate-income CTs. The cost of ownership in older housing stock is typically higher than in newer housing; thus, the median age of housing in moderate-income geographies is a significant barrier to mortgage lending in those CTs. Additionally, 9.5 percent of families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

Competition

Competition for deposits is significant given the number and size of the financial institutions with offices in the AA. As of June 21, 2021, FDIC deposit data showed Citizens and 20 other national, regional, and state banks operated 95 offices in Kenton and Boone counties. Citizens' one office with deposits of \$27.8 million represented a market share of 0.4 percent; this market share ranks Citizens fourteenth. In comparison to the competition, Citizens is one of two banks that does not have any offices outside the two-county AA.

Strong competition for home mortgage loans also exists. Aggregate HMDA data for 2021 shows a total of 368 lenders originated or purchased 21,612 home mortgage loans in the AA. The top five lenders include four regional or national banks and one online loan company. Each of these lenders originated between 1,145 to 1,770 loans to capture a market share ranging from 5.3 to 8.2 percent. Citizens is not required to report HMDA data, so its lending activity is not included in the aggregate data. If added to the aggregate, the number of loans originated or purchased by Citizens would represent about 0.3 percent of the market share.

Community Contact

Examiners considered comments from a community contact regarding potential credit and community development needs and opportunities. The contact from an affordable housing organization stated there are ongoing needs and opportunities to support affordable housing. The contact mentioned full-time workers earning the prevailing minimum wage have difficulty finding affordable housing, especially as housing costs are rising faster than their income. The contact further commented banks in the community are supportive, some more than others. In general, the contact believes banks can offer further support by continuing to partner with organizations that are working to address affordable housing issues.

**Scope of Evaluation in Kentucky**

Examiners performed a full-scope review of Citizens' only AA, the Cincinnati MSA. Refer to the table in Appendix A: Scope of Examination for additional information.

**LENDING TEST**

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

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

Based on a full-scope review, the bank's performance in the Cincinnati MSA AA is excellent. The geographic distribution of home mortgage loans is excellent. In addition, the bank's responsive CD loan had a positive impact that offset weaker performance for the borrower distribution.

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

The bank exhibits excellent geographic distribution of loans in the State of Kentucky.



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

Citizens' percentage of home mortgage loans originated or purchased in both low- and moderate-income areas exceeds the percentage of owner-occupied housing units and the aggregate percentage for all reporting lenders. Bank performance in low-income census tracts exceeds the percentage of owner-occupied housing units and aggregate percentage for all reporting lenders by one and two percentage points, respectively. Bank performance in moderate-income census tracts exceeds the percentage of owner-occupied housing units and aggregate percentage for all reporting lenders by five and seven percentage points, respectively.

Refer to Table O in the state of Kentucky 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.

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

The bank exhibits a poor distribution of loans to individuals of different income levels given the product lines offered by the bank. Examiners considered lending opportunities to LMI borrowers were somewhat limited by housing costs, poverty level, and market competition. Examiners also considered Citizens' borrower distribution excluding those loans for which no income is available.

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

Citizens' percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers is well below the percentage of low- and moderate-income families in the AA and the aggregate percentage for all reporting lenders. Bank performance to low-income borrowers falls below the percentage of low-income families and aggregate percentage for all reporting lenders by 18 and six percentage points, respectively. Bank performance to moderate-income borrowers falls below the percentage of moderate-income families and aggregate percentage for all reporting lenders by 11 and 15 percentage points, respectively.

As mentioned above, Citizens has a notable percentage of home mortgage loans to business entities for which borrower income is categorized as not available. Excluding the loans to business entities, the bank's percentage of loans to low- and moderate-income borrowers increases to 2 percent and 9.8 percent, respectively. However, the borrower distribution is still too concentrated in the middle- and upper-income categories to represent a reasonable distribution.

Refer to Table P in the state of Kentucky 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.

### **Responses to Complaints**

Citizens has not received any complaints about its performance in helping to meet the credit needs of its AA during the evaluation.

### **Community Development Lending**

Citizens' exhibits excellent responsiveness to CD lending needs, considering its capacity and the availability of such opportunities in the AA. Performance related to CD lending had a positive impact on the bank's rating in the state. Citizens' CD loan of \$500,000 represents 4.4 percent of its tier one

capital and supports affordable housing credit needs in the AA. The loan helped fund a low-income housing tax credit project that provides decent affordable housing for seniors (age 55+). The project consists of a three-story building with 25 one-bedroom and 25 two-bedroom apartments, a business center, fitness center, demonstration kitchen, and community room.

## 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 MSAs and non-MSAs 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>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Home mortgage loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<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>
Cincinnati OH KY IN MSA	Full Scope	Kenton and Boone County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	
Citizens Federal Savings & Loan Association	
Overall Bank:	Lending Test Rating
Citizens Savings & Loan Association	Outstanding
MMSA or State:	
State of Kentucky	Outstanding

## 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.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2019-21</b>	
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		
Cincinnati	64	13,215	100	21,612	5.3	6.3	4.3	13.5	18.8	11.3	49.7	57.8	49.6	31.5	17.2	34.9	0.0	0.0	0.0		
<b>Total</b>	<b>64</b>	<b>13,215</b>	<b>100</b>	<b>21,612</b>	<b>5.3</b>	<b>6.3</b>	<b>4.3</b>	<b>13.5</b>	<b>18.8</b>	<b>11.3</b>	<b>49.7</b>	<b>57.8</b>	<b>49.6</b>	<b>31.5</b>	<b>17.2</b>	<b>34.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 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</b>																				<b>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Cincinnati	64	13,215	100	21,612	20.0	1.6	8.1	17.1	7.8	20.8	21.6	18.8	21.3	41.3	51.6	33.3	0.0	20.3	16.5		
<b>Total</b>	<b>64</b>	<b>13,215</b>	<b>100</b>	<b>21,612</b>	<b>20.0</b>	<b>1.6</b>	<b>8.1</b>	<b>17.1</b>	<b>6.3</b>	<b>20.8</b>	<b>21.6</b>	<b>18.8</b>	<b>21.3</b>	<b>41.3</b>	<b>40.6</b>	<b>33.3</b>	<b>0.0</b>	<b>32.8</b>	<b>16.5</b>		

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*