



## **PUBLIC DISCLOSURE**

August 08, 2022

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First FS & LA  
Charter Number: 703313  
404 Main St  
Delta, OH 43515-1304

Office of the Comptroller of the Currency  
Northern Ohio Office  
200 Public Square Suite 1610  
Cleveland, OH 44114-2301

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.

## Table of Contents

Overall CRA Rating .....	1
Description of Institution.....	2
Scope of the Evaluation.....	3
Discriminatory or Other Illegal Credit Practices Review .....	4
State Rating .....	5
State of Ohio.....	5
Appendix A: Scope of Examination.....	Appendix A-1
Appendix B: Summary of State Rating .....	Appendix B-1
Appendix C: Definitions and Common Abbreviations.....	Appendix C-1
Appendix D: Tables of Performance Data.....	Appendix D-1

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.  
The lending test is rated: **Satisfactory**

The major factors that support this rating include:

- The Lending Test rating is based on a good level of overall lending in the state of Ohio. The bank demonstrated a high level of lending in the assessment area (AA), adequate distribution of home mortgage loans among borrowers of different incomes, and poor geographic distribution of home mortgages due to limited lending opportunities in low-to-moderate income (LMI) census tracts (CTs) in the AA. The bank maintained a reasonable loan-to-deposit ratio.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is **reasonable**.

First Federal Savings & Loan Association of Delta's (FFD) LTD ratio is calculated on a bank-wide basis and is reasonable for satisfactory performance. FFD's quarterly average LTD ratio for the evaluation period was 52.37 percent, with a quarterly average low of 43.42 percent in the fourth quarter of 2021 and a high of 60.32 percent in the second quarter of 2019. The quarterly LTD average ratios for peer banks, including four banks with assets under \$3 billion in the AA, ranged from 78.43 percent to 86.32 percent. FFD's LTD average LTD ratio ranked last among the five total banks.

Despite its lower average LTD ratio, FFD's performance is reasonable considering lending was impacted by competition from other banks and significant deposit growth despite low deposit pricing. Total deposits have increased 44.2 percent or \$62.6 million since the end of our prior evaluation period, far exceeding the 3.8 percent loan growth. Further, the bank also sells its home mortgage loans to the secondary market, selling \$4.96 million in loans during the evaluation period. Going forward, management hopes to further develop expertise in selling and underwriting other loan types such as commercial and consumer lending in order to remain competitive and increase loan growth.

## Lending in Assessment Area

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

FFD originated and purchased 83.3 percent of its total loans by number and 87.4 percent by dollar amount inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This level of lending had a positive impact on the bank's overall geographic distribution of lending by income level.

<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											
2019	69	84.1	13	15.9	82	10,645	88.3	1,416	11.7	12,062	
2020	124	81.6	28	18.4	152	22,640	86.2	3,633	13.8	26,273	
2021	145	84.3	27	15.7	172	27,152	88.0	3,689	12.0	30,841	
Total	338	83.3	68	16.7	406	60,437	87.4	8,739	12.6	69,175	

Source: Bank Data

Due to rounding, totals may not equal 100.0%

## Description of Institution

FFD is a \$226.7 million bank intrastate, federally chartered thrift headquartered in Delta, Ohio. The thrift is owned by First FedDelta Bancshares, MHC, a one-bank mutual holding company with total assets of \$37.8 million as of December 31, 2021.

FFD operates in one AA within a portion of the Toledo metropolitan statistical area (MSA), primarily serving residential borrowers within central and eastern Fulton County, northern Wood County, and western Lucas County. The bank has six branch locations, including its main office, all located within the AA and each houses an automated teller machine (ATM). The bank relocated its Holland branch in 2019 but the new location remains within the Toledo AA.

The bank offers traditional loan products, including home mortgage, construction, consumer, and commercial loans. FFD continues to participate in the “Welcome Home Program,” offering down payment assistance to applicants with incomes under limits established by the state housing finance agency. Throughout 2020 the bank also offered paycheck protection program (PPP) loans through the Small Business Administration (SBA). The bank’s primary line of business is residential home mortgages, and the same products are offered at all branch locations.

During the evaluation period, the bank’s total loan portfolio grew 3.9 percent, totaling \$88.7 million as of December 31, 2021, and net loans total 39.1 percent of total assets. The loan portfolio is comprised of 90.7 percent residential mortgages, 3.6 percent construction loans, 2.3 percent home equity lines of credit, 1.4 percent nonfarm nonresidential properties, 1.2 percent commercial and industrial loans, and 0.8 percent consumer loans. Tier 1 capital totaled approximately \$21.6 million.

FFD’s deposit products and services include personal and business checking, savings accounts, certificates of deposit, individual retirement accounts, Christmas club accounts, online and mobile banking, online bill pay, ATM services, card valet, and digital wallet services. Additional services include money orders, cashier checks, wire transfers, debit cards, gift cards, and safe deposit boxes.

There are no legal, financial, or other factors impeding on FFD's ability to meet the credit needs of the AA. The bank received a "Satisfactory" rating on the previous CRA performance evaluation dated July 17, 2018.

## **Scope of the Evaluation**

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

This performance evaluation assesses FFD's record of meeting the credit needs of its AA. We performed a full-scope review using Small Bank CRA examination procedures, which includes a lending test. The evaluation period for lending activity covers January 1, 2019, through December 31, 2021. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AA through its home mortgage activities.

Based on the bank's internal reports for lending activity and discussions with senior management, we determined that the bank's primary lending focus during the evaluation period was home mortgage loans. While FFD offers other products, such as commercial and consumer loans, these products are not a primary lending focus. As a result, we did not consider these as part of our evaluation, as an analysis of this data would not be meaningful.

Information from members of the local community was considered in our assessment. We contacted two organizations focused on affordable housing within the bank's AA.

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

In each state where the bank has an office, one AA within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA are combined and evaluated as a single AA. This combined AA may be evaluated as full- or limited-scope. Refer to the "Scope" section under the State Rating for details regarding how full-scope AA was selected. Refer to appendix A, Scope of Examination, for details on the full-scope AA.

### **Ratings**

FFD's overall rating is based on its lending performance in the state of Ohio. The state rating is based on performance in the bank's AA that received a full-scope review. We gave all consideration to the bank's performance within the Toledo AA when determining the overall state rating as this represented the bank's market with all deposit concentration and a majority of lending activity. The Toledo AA also contains bank headquarters and all branches. 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 institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

# State Rating

## State of Ohio

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

**The Lending Test is rated: Satisfactory**

The major factors that support this rating include:

- Lending activity reflects reasonable responsiveness to the credit needs in the bank’s AA.
- The loan-to-deposit ratio is reasonable.
- A substantial majority of the bank’s loans are inside the AA.
- The bank exhibits a reasonable distribution of home mortgages to individuals of different income levels.

## Description of Institution’s Operations in Ohio

FFD operates all six branches and the main office within the Toledo AA. During the evaluation period, the bank relocated one branch location, but this remains within the AA. All branches operate on the same days and hours, and each branch has a drive-up ATM. The CTs within each AA meet the requirements of the CRA and do not arbitrarily exclude any LMI CTs.

## Toledo AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: FFSLA Toledo AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	1.8	3.5	43.9	50.9	0.0
Population by Geography	273,718	1.6	3.1	41.1	54.2	0.0
Housing Units by Geography	119,224	2.4	3.8	43.2	50.5	0.0
Owner-Occupied Units by Geography	76,871	0.6	1.8	39.4	58.1	0.0
Occupied Rental Units by Geography	34,527	5.5	7.5	50.7	36.3	0.0
Vacant Units by Geography	7,826	7.0	6.5	47.6	38.9	0.0
Businesses by Geography	20,944	1.3	2.8	38.5	57.5	0.0
Farms by Geography	722	0.7	2.4	40.7	56.2	0.0
Family Distribution by Income Level	71,571	15.1	14.4	19.3	51.1	0.0
Household Distribution by Income Level	111,398	18.5	13.9	14.9	52.8	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$60,742	Median Housing Value			\$149,249

	Median Gross Rent	\$742
	Families Below Poverty Level	8.2%
<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>		

FFD’s AA is comprised of a portion of the Toledo MSA, focused in central/eastern Fulton County, northern Wood County, and western Lucas County. Management selected the AA based on the geographic location of the branches and the bank’s historical lending in smaller communities outside of Toledo. The area is a mix of urban, suburban, and rural areas located outside of the metropolitan Toledo area. Based on 2015 American Community Survey (ACS) data, the AA consists of 57 CTs and includes one low-income, two moderate-income, 25 middle-income, and 29 upper-income CTs.

Competition for deposits in the AA is high, with a mix of large and community banks serving the area. Per the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share report, 22 institutions operate in the AA, maintaining 163 offices. FFD ranked 12th in terms of deposit market share, with 1.2 percent, or \$189.2 million in deposits. All of the bank’s deposits are within this AA. The largest competitors for deposits include Fifth Third Bank, Huntington National Bank, KeyBank, PNC Bank, and Signature Bank, which hold an overall combined 72.5 percent of the deposits within the market.

We considered information from two community contacts focused on affordable housing in order to obtain an understanding of the AA’s financial needs and credit opportunities. The organizations’ primary focus is providing safe and affordable housing to low-to-moderate income families, as well as other programs including weatherization and homeownership counseling. The contacts provided numerous opportunities for bank involvement including general operating support, lines of credit for operational use, low-interest rehabilitation project loans, financial literacy engagements, and various building grants.

## Scope of Evaluation in Ohio

We selected FFD’s Toledo AA for a full-scope review as this is the bank’s only AA and has all the bank’s deposits and a majority of the bank’s loans. Refer to *Appendix A* for more information.

We evaluated FFD’s performance in the state of Ohio by analyzing the bank’s lending performance from January 1, 2019, through December 31, 2021. We considered the bank’s performance within the Toledo AA based on total loan originations and total deposits serviced when determining the overall state rating. In determining our ratings, we weighed demographic factors of the AA that could affect the bank’s ability to lend. These factors include significant competition from institutions, the number of low- and moderate-income CTs, and location of the majority of owner-occupied housing.

The procedures used to assess FFD’s lending performance focused on the bank’s primary lending product, home mortgages. The Office of Management and Budget (OMB) instituted changes to some MSA delineations that took effect January 1, 2019. The bank’s AA was not impacted by the OMB changes, allowing 2019 through 2021 data to be combined for analysis.



We also utilized other supporting information while evaluating FFD's CRA performance. Additional supporting information included 2015 ACS data, 2019 through 2021 bank loan data, internal bank records, FDIC deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AAs. We also considered information from community contacts to help assess the needs of the bank's AAs.

## **Lending Test**

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

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

Based on a **full-scope review**, the bank's performance in the **Toledo AA** is **good**.

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

The bank exhibits **poor** geographic distribution of loans in the State.

### *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.

In determining our ratings, we weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from institutions offering more diversified products, the number of LMI CTs, and the location of the majority of owner-occupied housing.

The overall geographic distribution of home mortgage loans in the Toledo AA is poor. In our analysis, we considered that the majority of lending opportunities exist in upper- and middle-income CTs within the AA. According to the 2015 ACS, those CTs contained 97.5 percent of owner-occupied housing units in the AA. The bank's AA had one low-income CT and two moderate-income CTs.

Additionally, the percentage of renter-occupied housing units in LMI CTs is 5.5 percent and 7.5 percent, respectively. While 2.4 percent and 3.8 percent of housing units are located in LMI CTs, respectively, only 0.6 percent in low-income CTs and 1.8 percent in moderate-income CTs are owner-occupied.

The bank did not originate any home mortgage loans in low-income CTs in the AA. This is slightly below the 0.6 percent of owner-occupied housing units in low-income CTs and the aggregate home mortgage lending percentage of 0.7 percent. The proportion of the bank's home mortgage lending in moderate-income CTs at 0.2 percent is below both the owner-occupied housing unit percentage of 1.8 percent, and the aggregate home mortgage lending percentage of 1.3 percent.

In determining the impact of the bank's lending performance by geographic location, we considered the limited number of lending opportunities available to the bank in the LMI geographies. This is primarily due to the limited number of owner-occupied housing units in these geographies. Per discussion with management, one of the CTs houses a large Amazon distribution facility and the bulk of the housing in the area is rentals. In addition, the bank's direct competition is large and community banks that offer a

variety of loan products which may appeal to customers seeking to conduct business with one institution, while FFD focuses primarily on home mortgages. The bank has made an effort in advertising to these areas including advertising in Value Packs for these zip codes and smart phone pop-up ads.

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

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

### ***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.

In evaluating the borrower distribution of home mortgage loans, we considered the level of competition and its effect on limiting the bank's ability to lend to borrowers of different incomes, as well as the economic conditions in the AA. We also considered the percentage of families that live below the poverty level, and the barriers this creates for these families to qualify for home mortgage financing.

The bank's overall borrower distribution of home mortgage loans among borrowers of different income levels throughout the Toledo AA is reasonable. The proportion of home mortgage loans to low-income borrowers total 5.3 percent and is higher than the 4.7 percent aggregate bank lending level. Though the bank's percentage of home mortgage loans is below the 15.1 percent of low-income families in the AA, the bank's level of lending is reasonable given that 8.2 percent of the families in the AA are considered to be living below the poverty level. The proportion of the bank's home mortgage loans to moderate-income borrowers at 15.1 percent is comparable to the percentage of families in the AA at 14.4 percent and near the aggregate lending level of 16.3 percent.

### **Responses to Complaints**

The bank has not received any complaints related to CRA performance during the evaluation period.

## **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>	(01/01/19 to 12/31/21)	
<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>
<b>State</b>		
<u>State of Ohio</u> Toledo MSA	Full-scope	AA includes only a portion of the MSA, including Central/Eastern Fulton County, Northern Wood County, and Western Lucas County.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS      First Federal Savings & Loan Association of Delta	
Overall Bank:	Lending Test Rating
First Federal Savings and Loan Association of Delta	Satisfactory
State:	
Ohio – Toledo MSA	Satisfactory

## 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>2019-2021</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Toledo AA	338	60,437	100.0	0.6	0.0	0.7	1.8	0.2	1.3	39.4	34.3	32.1	58.1	65.4	66.0	0.0	0.0	0.0	
<b>Total</b>	338	60,437	100.0	0.6	0.0	0.7	1.8	0.2	1.3	39.4	34.3	32.1	58.1	65.4	66.0	0.0	0.0	0.0	

*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>2019-2021</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Toledo AA	338	60,437	100.0	15.1	5.3	4.7	14.4	15.1	16.3	19.3	23.4	22.3	51.1	53.0	45.6	0.0	3.3	11.2	
<b>Total</b>	338	60,437	100.0	15.1	5.3	4.7	14.4	15.1	16.3	19.3	23.4	22.3	51.1	53.0	45.6	0.0	3.3	11.2	

*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%*

