



PUBLIC DISCLOSURE

March 4, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Peoples Federal Savings and Loan Association
Charter Number 703917

101 E. Court Street
Sidney, OH 45365-3021

Office of the Comptroller of the Currency

Central Ohio Field Office
Westlake Center
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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

OVERALL CRA RATING	3
DEFINITIONS AND COMMON ABBREVIATIONS	4
DESCRIPTION OF INSTITUTION	8
SCOPE OF THE EVALUATION.....	9
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	11
LENDING TEST	11
APPENDIX A: SCOPE OF EXAMINATION.....	A-1
APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

Overall CRA Rating

The Lending Test is rated: Outstanding.

The major factors supporting the outstanding rating for Peoples Federal Savings and Loan Association (hereafter “Peoples” or “bank”) include:

- Lending to borrowers of different income levels and businesses and farms of different sizes reflects excellent distribution.
- The bank’s quarterly average loan-to-deposit (LTD) ratio is more than reasonable.
- Peoples originates a substantial majority of its loans inside its assessment area (AA).

Definitions and Common Abbreviations

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

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

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development (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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. 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 it and half below it.

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

Metropolitan Division (MD): 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 (MSA): 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

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

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

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

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

Description of Institution

Peoples is a federally chartered savings and loan association headquartered in Sidney, Ohio with total assets of \$112.3 million as of December 31, 2018. The bank is 100 percent owned by Peoples-Sidney Financial Corporation, a one-bank holding company headquartered in Sidney, Ohio. The main office and one branch office (located in Walmart) are located in Sidney, approximately 40 miles north of Dayton, Ohio. The bank operates two additional branches, one located in Anna and one in Jackson Center, Ohio. All offices have a deposit-taking ATM. The bank has drive-thru facilities at all branches except the branch located in Walmart. The offices are open during normal business hours and on Saturday mornings. The main office is located in a moderate-income census tract (CT), with the remaining offices in middle- or upper-income CTs. The bank has not opened or closed any offices since the previous CRA evaluation in 2013.

Peoples designated one AA consisting of Shelby County, Ohio (Shelby County AA) in its entirety, as this is where all of their offices are located. The AA is not part of any metropolitan statistical area (MSA). The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- and moderate-income CTs. As of the 2010 U.S. Census, there were zero low-income CTs, two moderate-income CTs, four middle-income CTs, and four upper-income CTs in Shelby County. As of the 2015 American Community Survey (ACS) U.S. Census, there were zero low-income CTs, one moderate-income CT, two middle-income CTs, and seven upper-income CTs in Shelby County. Refer to Appendix B for specific details regarding the AA.

Peoples serves its community with traditional deposit accounts and one-to-four family residential real estate loans (home mortgage), commercial/commercial real estate loans (small business), and agricultural loans (small farm). As of December 31, 2018, net loans totaled \$81.4 million, representing 72.5 percent of total assets. Tier 1 capital was \$14.9 million, or 13.3 percent of total assets for the same time period. The bank's loan originations and purchases by dollar volume during the lending evaluation period (2016 – 2018) are 44.0 percent home mortgage, 27.0 percent small farm, 25.4 percent small business, and 3.6 percent consumer. The bank's primary lending focus is home mortgage, small farm, and small business lending. Peoples does not sell home mortgage loans to the secondary market.

The bank is responsive to the community development needs in the AA. In addition to traditional mortgage products, the bank participates in the Federal Home Loan Bank's Welcome Home Grant Program which is designed to remove down-payment and closing cost obstacles for low- and moderate-income residents. The bank is a financial supporter of the Shelby County United Way, which assists many low- and moderate-income individuals in the county.

Competition in the AA is strong with state and national banks, savings associations, and branches of larger financial institutions. Financial institutions with significant deposit

activity in the AA include U.S. Bank National Association, JPMorgan Chase Bank, National Association, and Peoples. Peoples' primary competitors in the AA include Minster Bank, Osgood State Bank, and First National Bank in New Bremen. As of the June 30, 2017 and June 30, 2018, Federal Deposit Insurance Corporation's (FDIC's) Deposit Market Share Reports for Shelby County, Peoples ranks third out of 10 financial institutions in deposit market share in the AA with a 9.4 percent market share during each time period.

There are no financial, legal, or other factors that impede Peoples' ability to help meet the credit needs of its AA. Peoples' previous CRA rating was "outstanding" as of the CRA Performance Evaluation (PE) dated July 8, 2013.

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 low- and moderate-income areas. We used the small savings association CRA evaluation procedures to assess the bank's performance. The Lending Test included a random sample of 20 home mortgage, 20 small business, and all small farm loans originated or purchased each year in the lending evaluation period (January 1, 2016, to December 31, 2018). We analyzed lending activity in full-year increments for 2016, 2017, and 2018. Home mortgage, small business, and small farm loans are the bank's primary lending products and were evaluated under the Lending Test. Due to changes in demographic information during the lending 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 U.S. Census data for loans originated/purchased in 2017 – 2018.

Data Integrity

Peoples is not subject to home mortgage, small business, or small farm loan reporting requirements. Therefore we completed transaction testing on a random sample of home mortgage, small business, and small farm loans for each year in the lending evaluation period. We reviewed source documentation for each loan in the sample and did not note any substantive deficiencies in the data provided.

Selection of Areas for Full-Scope Review

We completed a full-scope review of the bank's only AA, the Shelby County AA. Refer to the tables in Appendices A, B, and C for additional information.

Ratings

Peoples' overall rating is based on the full-scope review of the Shelby County AA.

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 assessment area 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 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.

Conclusions with Respect to Performance Tests

LENDING TEST

Peoples' lending performance is outstanding. During the lending evaluation period, Peoples originated a substantial majority of its loans inside its AA and the LTD ratio is more than reasonable. The bank originated more loans to low- and moderate-income borrowers and to small businesses and farms with gross annual revenues under \$1 million than aggregate lending data, reflecting excellent distribution. We placed the most weight in the Lending Test rating on the borrower income distribution conclusions.

Loan-to-Deposit Ratio

People's quarterly average LTD ratio is more than reasonable given its size, financial condition, and AA credit needs. The bank's quarterly average LTD ratio over the 22 quarters since the prior CRA evaluation (September 2013 to December 2018) was 85.1 percent. The ratio has been increasing from a low of 81.6 percent in June 2014 to a high of 88.0 percent in September 2018. The quarterly average LTD ratio for similar financial institutions in the AA with total assets under \$1 billion is 70.3 percent. People's LTD ratio of 85.1 percent compares favorably to peer.

Lending in Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	50	83.3	10	16.7	60	3,570	81.5	810	18.5	4,380
Small Business	48	80.0	12	20.0	60	3,823	82.1	834	17.9	4,657
Small Farm	34	59.6	23	40.4	57	4,501	68.6	2,061	31.4	6,562
Total	132	74.6	45	25.4	177	11,894	76.2	3,705	23.8	15,599

*Source: 01/01/2016 – 12/31/2018 Bank Data (loan sample of 20 loans per loan category per year in the lending evaluation period).
 Note: The 2017 small farm loan sample included all originations within the year, which was 17 loans.
 Due to rounding, totals may not equal 100.0 percent.*

Peoples originated a substantial majority of its loans inside the AA during our lending evaluation period, with 74.6 percent by number volume within the AA. The bank's primary lending products are home mortgage, small business, and small farm lending. Overall, the bank originated over 80 percent of the number volume of both home mortgage and small business loans in our sample inside the AA, which represents a substantial majority inside the AA. Small farm lending within the AA was less than the 80 percent by number volume of the other primary products; however, farmland in the local market is often outside the bank's AA in a neighboring county. Table D above details the bank's lending inside the AA during the lending evaluation period.

Lending to Borrowers of Different Incomes and to Businesses and Farms of Different Sizes

Lending to borrowers of different incomes and businesses and farms of different sizes reflects excellent distribution.

Home Mortgage Loans

The bank's home mortgage lending to low- and moderate-income borrowers is excellent as it exceeds aggregate lending data in each year of our lending evaluation period. Peoples originated home mortgage loans to each borrower income level despite 8.9 percent of families within the AA living below the poverty level in 2016 and 7.3 percent in years 2017 and 2018.

Small Business Loans

The bank's lending to small businesses of different sizes is excellent. Peoples originated a higher percentage of loans to small businesses with total gross annual revenues less than \$1 million than aggregate lending data in each year of our lending evaluation period. The majority of businesses within the AA have total gross annual revenues less than \$1 million which increases small business lending opportunities.

Small Farm Loans

The bank's lending to small farms of different sizes is excellent. Peoples originated a higher percentage of loans to small farms with total gross annual revenues less than \$1 million than aggregate lending data in each year of our lending evaluation period. We note that the majority of the small farms in the AA have total gross annual revenues less than \$1 million which increases small farm lending opportunities.

Refer to Table P, R, and T in Appendix C and the community profiles in Appendix B for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

Geographic Distribution of Loans

Peoples' geographic distribution of loans is overall reasonable. There are no low-income CTs in the bank's AA. As of the 2010 U.S. Census data, the bank had two moderate-income CTs in the AA. As of the 2015 ACS U.S. Census data, the bank has one moderate-income CT. The moderate-income CTs are located within the city of Sidney, Ohio. The majority of the AA is middle- and upper-income areas. The lending analysis reflected lending in most areas, with no conspicuous gaps in lending.

Home Mortgage Loans

The bank's geographic distribution of home mortgage lending reflects reasonable distribution. Peoples' lending in the two moderate-income CTs in 2016 exceeded the aggregate lending data for that year, reflecting excellent distribution. In 2017 and 2018, lending in the one moderate-income CT fell below aggregate lending data, but is reasonable overall. The bank originated/purchased a total of 179 home mortgage loans during the lending evaluation period. We sampled 20 loans per year for a total of 60 loans, representing only 33.5 percent of total loan originations/purchases. The sample may not have included a representative sample of loans in the moderate-income CTs.

Small Business Loans

The bank's geographic distribution of small business lending is excellent overall. Peoples' lending in 2016 in the moderate-income CTs falls below the aggregate lending data; however, our sample of 20 loans may not have captured all business lending in the moderate-income CTs. In 2017 and 2018, the percentage of bank loans originated in the moderate-income CT exceeds the aggregate lending data and the percentage of businesses in moderate-income CTs for that time period, representing excellent performance. We sampled a total of 40 loans originated in 2017 and 2018.

Small Farm Loans

A geographic distribution analysis of small farm lending would not be meaningful, as the moderate-income CTs in the AA are located in the city of Sidney, where farming is not prevalent. As of the 2018 D&B Data, there were no small farms in the moderate-income CTs. Both the aggregate lending data and the bank's lending in moderate-income CTs from 2016 – 2018 reflect zero percent of farm loans in the moderate-income CTs.

Refer to Table O, Q, and S in Appendix C and the community profiles in Appendix B for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

Responses to Complaints

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

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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/2016 – 12/31/2018 Investment and Service Tests and CD Loans: Not applicable (NA)	
Financial Institution		Products Reviewed
Peoples Federal Savings and Loan Association (Peoples) Sidney, OH		Home Mortgage Loans Small Business Loans Small Farm Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Shelby County, Ohio – Non-metropolitan Area	Full-Scope	Please refer to Appendix B for more details on the bank’s AA.

Appendix B: Community Profiles for Full-Scope Areas

Shelby County AA

Table A – Demographic Information of the Assessment Area (2016)						
Assessment Area: Shelby County, Ohio						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	20.0	40.0	40.0	0.0
Population by Geography	49,423	0.0	19.6	38.8	41.5	0.0
Housing Units by Geography	20,049	0.0	21.0	39.2	39.8	0.0
Owner-Occupied Units by Geography	13,918	0.0	13.7	41.3	44.9	0.0
Occupied Rental Units by Geography	4,570	0.0	38.9	33.3	27.8	0.0
Vacant Units by Geography	1,561	0.0	33.1	37.3	29.7	0.0
Businesses by Geography	2,354	0.0	21.5	41.8	36.7	0.0
Farms by Geography	307	0.0	1.0	45.9	53.1	0.0
Family Distribution by Income Level	13,440	15.9	17.3	21.6	45.2	0.0
Household Distribution by Income Level	18,488	17.4	16.3	19.4	47.0	0.0
Median Family Income (MFI) Non-MSAs – OH		\$52,573	Median Housing Value			\$125,360
FFIEC Estimated Non-MSA MFI – OH – 2016		\$55,400	Median Gross Rent			\$651
			Families Below Poverty Level			8.9%
<p><i>Source: 2010 U.S. Census and 2016 D&B Data; 2016 FFIEC Updated Non-MSA MFI for the State of Ohio.</i></p> <p><i>Due to rounding, totals may not equal 100.0</i></p> <p><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

Table A-1 – Demographic Information of the Assessment Area (2017 – 2018)

Assessment Area: Shelby County, OH

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	10.0	20.0	70.0	0.0
Population by Geography	49,067	0.0	7.3	20.5	72.1	0.0
Housing Units by Geography	20,201	0.0	9.2	21.8	68.9	0.0
Owner-Occupied Units by Geography	13,138	0.0	3.8	17.6	78.6	0.0
Occupied Rental Units by Geography	5,399	0.0	17.2	33.5	49.3	0.0
Vacant Units by Geography	1,664	0.0	26.6	17.0	56.4	0.0
Businesses by Geography	2,415	0.0	10.8	20.4	68.8	0.0
Farms by Geography	289	0.0	0.0	1.4	98.6	0.0
Family Distribution by Income Level	13,382	13.7	16.5	20.7	49.1	0.0
Household Distribution by Income Level	18,537	16.0	14.6	19.7	49.7	0.0
Median Family Income Non-MSAs - OH		\$56,217	Median Housing Value			\$130,327
FFIEC Estimated Non-MSA MFI – OH – 2017		\$57,600	Median Gross Rent			\$689
FFIEC Estimated Non-MSA MFI – OH – 2018		\$61,400	Families Below Poverty Level			7.3%

Source: 2015 ACS Census and 2018 D&B Data; 2017 and 2018 FFIEC Updated Non-MSA MFI for the State of Ohio.

Due to rounding, totals may not equal 100.0

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

Peoples designated one AA consisting of Shelby County, Ohio, in its entirety. Shelby County is located in the western part of Ohio and not part of any MSA. Sidney is the county seat in Shelby County. The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- or moderate-income areas. Management has not changed the AA since the previous CRA evaluation in 2013. Management selected the AA based on their targeted lending territory and office locations.

The underlying demographics changed in 2015 due to the American Community Survey (ACS). Our 2016 analysis used the 2010 U.S. Census demographics. Our 2017 and 2018 analysis used the 2015 ACS Census demographics. The 2015 ACS Census data resulted in changes to the CT classifications.

Economic conditions in the AA are good and overall stable, with the “not seasonally adjusted” unemployment rate in Shelby County of 4.1 percent as of December 2018 lower than the State of Ohio’s unemployment rate of 4.8 percent. Nationally, the unemployment rate was 3.7 percent for the same time period. The source of the unemployment data was the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information.

The AA has a diverse mix of companies across many industries, from manufacturing to agriculture. Large employers in Shelby County include Honda of America Manufacturing Inc., Emerson Climate Technologies, Airstream, Plastipak Packaging Inc., NK Parts, Wilson Memorial Hospital, and the Sidney School Systems.

According to the 2010 U.S. Census data, the median housing value in the Shelby County AA was \$125,360. 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 2.8 to 4.5 times the annual income of low- and moderate-income families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some low- and moderate-income families. There are 20,049 total housing units in the AA, of which 69.4 percent are owner-occupied and 22.8 percent are rental occupied units. Approximately 8.9 percent of the families are below the poverty level.

According to the 2015 ACS U.S. Census data, the median housing value in Shelby County was \$130,327. 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 2.8 to 4.5 times the annual income of low- and moderate-income 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 2.7 to 4.2 times the annual income of low- and moderate-income families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some low- and moderate-income families. There are 20,201 total housing units in the AA, of which 65.0 percent are owner-occupied and 26.7 percent are rental occupied units. About 7.3 percent of the families are below the poverty level.

We conducted an interview with a representative from a local affordable housing organization as part of this CRA evaluation. 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.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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 MA/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 originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data is 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 Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer 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. Because small farm data is 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 (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer 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 throughout 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 MA/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
Shelby County AA	20	\$1,285	100.0	1,226	0.0	0.0	0.0	13.7	20.0	12.2	41.3	20.0	39.4	44.9	60.0	48.5	0.0	0.0	0.0
Total	20	\$1,285	100.0	1,226	0.0	0.0	0.0	13.7	20.0	12.2	41.3	20.0	39.4	44.9	60.0	48.5	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.

*Percentages used for "Bank Loans" is based on a sample of 20 home mortgage loans.
**The "Overall Market" includes only loans reported by HMDA-reporting lenders.

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
Shelby County AA	40	\$3,954	100.0	1,110	0.0	0.0	0.0	3.8	2.5	4.5	17.6	17.5	20.2	78.6	80.0	75.3	0.0	0.0	0.0
Total	40	\$3,954	100.0	1,110	0.0	0.0	0.0	3.8	2.5	4.5	17.6	17.5	20.2	78.6	80.0	75.3	0.0	0.0	0.0

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

*Percentages used for "Bank Loans" is based on a sample of 40 home mortgage loans.
**The "Overall Market" includes only loans reported by HMDA-reporting lenders.

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
Shelby County AA	20	\$1,285	100.0	1,226	15.9	15.0	5.6	17.3	35.0	17.3	21.6	30.0	23.3	45.2	20.0	36.1	0.0	0.0	17.7
Total	20	\$1,285	100.0	1,226	15.9	15.0	5.6	17.3	35.0	17.3	21.6	30.0	23.3	45.2	20.0	36.1	0.0	0.0	17.7

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.

*Percentages used for "Bank Loans" is based on a sample of 20 home mortgage loans.
**The "Overall Market" includes only loans reported by HMDA-reporting lenders.

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
Shelby County AA	40	\$3,954	100.0	1,110	13.7	7.5	6.2	16.5	20.0	19.8	20.7	30.0	23.4	49.1	42.5	31.1	0.0	0.0	19.5
Total	40	\$3,954	100.0	1,110	13.7	7.5	6.2	16.5	20.0	19.8	20.7	30.0	23.4	49.1	42.5	31.1	0.0	0.0	19.5

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

*Percentages used for "Bank Loans" is based on a sample of 40 home mortgage loans.
**The "Overall Market" includes only loans reported by HMDA-reporting lenders.

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
Shelby County AA	20	\$1,596	100.0	611	0.0	0.0	0.0	21.5	10.0	14.2	41.8	45.0	44.4	36.7	45.0	41.4	0.0	0.0	0.0
Total	20	\$1,596	100.0	611	0.0	0.0	0.0	21.5	10.0	14.2	41.8	45.0	44.4	36.7	45.0	41.4	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.

*Percentages used for "Bank Loans" is based on a sample of 20 small business loans.
**The "Overall Market" includes only loans reported by CRA-reporting lenders

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
Shelby County AA	40	\$3,206	100.0	575	0.0	0.0	0.0	11.0	12.5	7.5	20.7	2.5	19.5	68.4	85.0	73.0	0.0	0.0	0.0
Total	40	\$3,206	100.0	575	0.0	0.0	0.0	11.0	12.5	7.5	20.7	2.5	19.5	68.4	85.0	73.0	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.

*Percentages used for "Bank Loans" is based on a sample of 40 small business loans.
**The "Overall Market" includes only loans reported by CRA-reporting lenders.

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
Shelby County AA	20	\$1,596	100.0	611	77.2	70.0	37.6	8.7	30.0	14.1	0.0
Total	20	\$1,596	100.0	611	77.2	70.0	37.6	8.7	30.0	14.1	0.0
<i>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.</i>											
<i>*Percentages used for "Bank Loans" is based on a sample of 20 small business loans. **The "Overall Market" includes only loans reported by CRA-reporting lenders.</i>											

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
Shelby County AA	40	\$3,206	100.0	575	76.3	80.0	43.5	8.7	20.0	15.0	0.0
Total	40	\$3,206	100.0	575	76.3	80.0	43.5	8.7	20.0	15.0	0.0
<i>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.</i>											
<i>*Percentages used for "Bank Loans" is based on a sample of 40 small business loans. **The "Overall Market" includes only loans reported by CRA-reporting lenders.</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Shelby County AA	9	\$791	100.0	52	0.0	0.0	0.0	1.0	0.0	0.0	45.9	44.4	65.4	53.1	55.6	34.6	0.0	0.0	0.0
Total	9	\$791	100.0	52	0.0	0.0	0.0	1.0	0.0	0.0	45.9	44.4	65.4	53.1	55.6	34.6	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.

*Percentages used for "Bank Loans" is based on a sample of all small farm loans originated within the year in the AA.
**The "Overall Market" includes only loans reported by CRA-reporting lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Shelby County AA	25	\$3,710	100.0	54	0.0	0.0	0.0	0.0	0.0	0.0	1.3	4.0	0.0	98.7	96.0	100.0	0.0	0.0	0.0
Total	25	\$3,710	100.0	54	0.0	0.0	0.0	0.0	0.0	0.0	1.3	4.0	0.0	98.7	96.0	100.0	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.

*Percentages used for "Bank Loans" is based on a sample of all small farm loans originated in 2017 – 2018 in the AA.
**The "Overall Market" includes only loans reported by CRA-reporting lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Shelby County AA	9	\$791	100.0	52	99.7	100.0	59.6	0.3	0.0	0.0	0.0
Total	9	\$791	100.0	52	99.7	100.0	59.6	0.3	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.

*Percentages used for "Bank Loans" is based on a sample of all small farm loans originated within the year in the AA.
**The "Overall Market" includes only loans reported by CRA-reporting lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Shelby County AA	25	\$3,710	100.0	54	97.9	100.0	63.0	1.0	0.0	1.0	0.0
Total	25	\$3,710	100.0	54	97.9	100.0	63.0	1.0	0.0	1.0	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.

*Percentages used for "Bank Loans" is based on a sample of all small farm loans originated in 2017 – 2018 in the AA.
**The "Overall Market" includes only loans reported by CRA-reporting lenders.