



## **PUBLIC DISCLOSURE**

March 30, 2020

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

First FS & LA of Newark  
Charter Number: 702893

2 North Second Street  
Newark, OH 43055-5610

Office of the Comptroller of the Currency  
655 Metro Place South, Suite 625  
Dublin, OH 43017

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

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## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated **Outstanding**.

**The Lending Test is rated: Outstanding**

The major factors that support this rating include:

- The Lending Test rating is based on the State of Ohio rating, which is Outstanding. The thrift exhibits an excellent distribution of loans to individuals of different income levels. The thrift’s geographic distribution of loans is excellent.
- Additionally, the thrift’s performance relative to the activities considered at the bank-wide level is overall excellent. These include:
  - The thrift’s loan-to-deposit (LTD) ratio is more than reasonable.
  - A majority of the thrift’s loans are inside the assessment area (AA).

### Loan-to-Deposit Ratio

Considering the thrift’s size, financial condition, and credit needs of the AA, the thrift’s loan-to-deposit ratio is more than reasonable.

The thrift’s quarterly average LTD ratio over the 22 quarters since the previous CRA evaluation in June 2014 is 103.4 percent. The ratio ranged from a high of 113.1 as of September 30, 2014, to a low of 94.8 as of December 31, 2018. The OCC compared the thrift’s LTD ratio to a peer group comprised of nine other banks and thrifts of less than \$500 million in assets operating in Licking or nearby counties. The thrift’s average LTD of 103.4 percent compares favorably to the peer quarterly average of 77.9 percent, and is the highest in the peer group.

### Lending in Assessment Area

A majority of the thrift’s loans are inside its AA.

The thrift originated or purchased 67.7 percent of its total loans inside the thrift’s AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2017	198	66.9	98	33.1	296	29,554	62.4	17,840	37.6	47,394
2018	234	70.3	99	29.7	333	38,610	67.6	18,535	32.4	57,145
2019	252	73.7	90	26.3	342	44,917	71.8	17,603	28.2	62,520
<b>Subtotal</b>	<b>684</b>	<b>70.4</b>	<b>287</b>	<b>29.6</b>	<b>971</b>	<b>113,081</b>	<b>67.7</b>	<b>53,978</b>	<b>32.3</b>	<b>167,059</b>
<b>Total</b>	<b>684</b>	<b>70.4</b>	<b>287</b>	<b>29.6</b>	<b>971</b>	<b>113,081</b>	<b>67.7</b>	<b>53,978</b>	<b>32.3</b>	<b>167,059</b>

*Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data  
Due to rounding, totals may not equal 100.0*

## Description of Institution

First FS & LA (First or thrift) is a federally chartered, mutual thrift headquartered in Newark, Ohio. The thrift has five full-service branches in Licking County and a loan production office in the Columbus suburb of Gahanna in Franklin County. As of December 31, 2019, the thrift reported total assets of \$222 million, \$35.2 million in tier 1 capital, and total loans represented 78.2 percent of total assets. The thrift has not opened or closed any offices since the previous CRA evaluation.

The thrift is a single-state institution with one rating area. There is one AA that includes the entirety of Licking County, a part of the Columbus, OH MSA. The main office in Newark is located in a moderate-income census tract (CT). The thrift has three branches located in middle-income CTs, and one located in an upper-income CT. Two of the middle-income branches are near moderate-income CTs.

First offers traditional deposit accounts and loans. Home mortgage lending is the thrift's primary product. Based on the December 31, 2019 Consolidated Report of Condition and Income (Call Report), loans secured by residential real estate totaled \$145.1 million and represented 83.6 percent of total loans and leases. The remainder of the loan portfolio consisted of 16.1 percent commercial lending and 0.3 percent consumer lending. The thrift does not offer agriculture loans.

There are no financial, legal, or other factors that impede the thrift's ability to serve the credit needs of its community. First was rated Outstanding in the previous CRA Performance Evaluation dated December 1, 2014.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We conducted a full-scope CRA evaluation to assess the thrift's record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) individuals. We used the small savings association CRA evaluation procedures to assess the thrift's performance. Based on reviews of loan production reports and call report data, the OCC determined that residential real estate (home mortgage) is the thrift's primary lending product given the number of loans and dollar volume. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2017 through December 31, 2019. Refer to the table in appendix A for more information on the scope of the review.

### Selection of Areas for Full-Scope Review

In each state where the thrift has an office, one or more of AAs within that state was selected for a full-scope review. First has only one AA in the State of Ohio (Licking County a portion of the Columbus, OH, MSA AA), and it received a full-scope review. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### Ratings

The thrift is active only in the State of the Ohio, and the rating is based solely on activity in the lone AA in Ohio. The OCC placed all weight on home mortgage lending given that it is the thrift's primary product.

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

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

## State Rating

### State of Ohio

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

**The Lending Test is rated:** Outstanding

The major factors that support this rating include:

- The borrower-income distribution of home mortgage loans within the AA is excellent.
- The geographic-income distribution of home mortgage loans within the AA is excellent.

### Description of Institution's Operations in Ohio

The thrift's only AA includes Licking County, Ohio, in its entirety. The AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any LMI areas. First has five full-service branches located in Licking County. Licking County has a total of 32 CTs. Of the 32 CTs, two are considered low-income (6.3 percent), nine are considered moderate-income (28.1 percent), 14 are considered middle-income (43.8 percent), and seven are considered upper-income (21.9 percent). There have been no changes in CTs during the three-year evaluation period of 2017 – 2019.

Economic conditions in Licking County are stable. As of December 2019, per the U.S. Bureau of Labor Statistics (BLS), Licking County had a low unemployment rate of 3.4 percent. The unemployment rate has decreased during the evaluation period, as the rate was 4.2 percent on December 31, 2016. The population of Licking County has been growing steadily through the evaluation period, with the U.S. Census Bureau estimate for 2019 being 176,862. The economy is diverse with major sectors including primarily services and retail trade. Examples of major employers include: Amazon, Licking County Memorial Hospital, Ascena Retail Group, Kroger, Owens Corning, and Limited Brands.

Competition in Licking County is substantial and includes a mix of community banks, large banks, credit unions, and mortgage companies. According to the June 30, 2019 Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, compared with 12 competitors, First was ranked fourth in total deposit market share for Licking County with 6.5 percent. The top three in deposit market share were larger financial institutions and included Park National Bank, JP Morgan Chase, and Huntington National Bank, with these three banks holding 80.2 percent market share. The most recent mortgage market share data available was for 2018. For 2018, the thrift ranked sixth in mortgage lending market share (Home Mortgage Disclosure Act (HMDA) reporters only) in Licking County with 3.5 percent. The top five lenders include Huntington National Bank, Park National Bank, JP Morgan Chase, Wells Fargo Bank, and Quicken Loans Inc. Combined, the top five mortgage lenders in the county hold 27.8 percent of the market.

According to 2015 American Community Survey (ACS) data, the median housing value in the AA was \$147,240 and the median family income was \$70,454. Low-income families earn at most \$35,227. Therefore, median housing values were at least 4.2 times the annual income of low-income families in Licking County. This is reflective of an obstacle to homeownership for low-income families as it impacts the demand for mortgage loans among low-income families. Families living below the poverty line has been relatively stable and is currently estimated at 9.2 percent.

The OCC reviewed information from an interview with a representative from a nonprofit organization that provides social services and affordable housing to low-income residents of a 21-county region in Ohio, including Licking County. According to the contact, there is a need for affordable housing. Besides the need for affordable housing, there continues to be a large demand for utility and food assistance programs.

### Licking County Assessment Area

Table A – Demographic Information of the Assessment Area						
Assessment Area: Licking						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	6.3	28.1	43.8	21.9	0.0
Population by Geography	168,693	3.8	19.3	49.5	27.4	0.0
Housing Units by Geography	69,779	4.6	20.9	49.6	24.9	0.0
Owner-Occupied Units by Geography	46,298	3.0	15.3	52.1	29.6	0.0
Occupied Rental Units by Geography	17,932	7.1	33.5	43.6	15.8	0.0
Vacant Units by Geography	5,549	10.3	26.4	48.2	15.0	0.0
Businesses by Geography	10,386	2.6	20.0	47.4	30.0	0.0
Farms by Geography	617	1.5	8.4	59.8	30.3	0.0
Family Distribution by Income Level	45,206	21.4	17.4	22.4	38.8	0.0
Household Distribution by Income Level	64,230	23.8	16.4	17.7	42.1	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$147,240
			Median Gross Rent			\$772
			Families Below Poverty Level			9.2%
<i>Source: 2015 ACS Census and 2019 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>						

### Scope of Evaluation in Ohio

The OCC assessed the thrift’s performance in Licking County, the only AA. Based on the OCC’s review of loan production reports and call report data, home mortgage lending is the thrift’s primary lending product. See also appendix A.

### LENDING TEST

The thrift’s performance under the Lending Test in Ohio is rated Outstanding.

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

Based on a full-scope review, the thrift’s performance in the Licking County AA is excellent.

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

The thrift exhibits excellent geographic distribution of loans in the State of Ohio.

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

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

The OCC compared the percentage of home mortgage loans originated or purchased by the thrift to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the thrift's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

The thrift exhibits excellent geographic distribution of home mortgage loans in the AA.

The percentage of home mortgage loans originated by the thrift in low-income CTs exceeded the aggregate lending data of other HMDA reporters, and was near the demographic data. The thrift's lending to moderate-income CTs significantly exceeded the percentage of both the aggregate and the demographic data.

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

The thrift exhibits an excellent distribution of loans to individuals.

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

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

The OCC compared the percentage of home mortgage loans originated or purchased by the thrift to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data) in the AA, placing emphasis on lending to LMI families. The OCC also compared the thrift's performance against home mortgage loans of other home mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

The thrift exhibits an excellent distribution of home mortgage loans to individuals of different income levels in the AA.

The thrift's level of home lending to the low-income demographic exceeded aggregate data, but was significantly below the percentage of low-income families. However, the OCC considered the cost of homeownership in the AA as a substantial obstacle to homeownership. This obstacle results in fewer opportunities to originate mortgage loans to low-income families. The OCC also considered the moderate poverty rate in the AA.

The thrift's level of home lending to the moderate-income demographic exceeded the percentage of moderate-income families. The percentage of First's home mortgage loans was near the percentage of the aggregate data for moderate-income families. The OCC considered the substantial competition level



faced from much larger mortgage lenders with greater resources to develop and market CRA-related programs.

### **Responses to Complaints**

There were no complaints related to the thrift's CRA performance during the 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 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>	01/01/2017 to 12/31/2019	
<b>Bank Products Reviewed:</b>	Home mortgage	
<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>MMSA(s)</b>		
None.		
<b>States</b>		
Ohio		
Licking County	Full-Scope	32 CTs all located within Licking County

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS: FIRST FS &amp; LA OF NEWARK</b>	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
First FS & LA of Newark	Outstanding
<b>MMSA or State:</b>	
Ohio	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>2017-19</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		
Licking	684	113,081	100.0	6,785	3.0	2.8	2.6	15.3	24.7	15.0	52.1	51.3	50.5	29.6	21.2	31.9	0.0	0.0	0.0		
<b>Total</b>	<b>684</b>	<b>113,081</b>	<b>100.0</b>	<b>6,785</b>	<b>3.0</b>	<b>2.8</b>	<b>2.6</b>	<b>15.3</b>	<b>24.7</b>	<b>15.0</b>	<b>52.1</b>	<b>51.3</b>	<b>50.5</b>	<b>29.6</b>	<b>21.2</b>	<b>31.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017-19</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		
Licking	684	113,081	100.0	6,785	21.4	11.3	10.6	17.4	20.8	22.0	22.4	20.6	22.2	38.8	39.3	31.6	0.0	8.0	13.6		
<b>Total</b>	<b>684</b>	<b>113,081</b>	<b>100.0</b>	<b>6,785</b>	<b>21.4</b>	<b>11.3</b>	<b>10.6</b>	<b>17.4</b>	<b>20.8</b>	<b>22.0</b>	<b>22.4</b>	<b>20.6</b>	<b>22.2</b>	<b>38.8</b>	<b>39.3</b>	<b>31.6</b>	<b>0.0</b>	<b>8.0</b>	<b>13.6</b>		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*