



PUBLIC DISCLOSURE

September 3, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

New Carlisle Federal Savings Bank
Charter Number 703043

400 North Main Street
New Carlisle, OH 45344-1427

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 **Satisfactory**.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the State of Ohio rating, which is Satisfactory. The bank exhibits a reasonable geographic distribution of loans and a reasonable distribution of loans to individuals of different incomes and businesses of different sizes.
- Additionally, the bank's performance relative to the activities considered at the bank-wide level is overall reasonable. These include:
 - The bank's loan-to-deposit (LTD) ratio is more than reasonable.
 - A majority of the bank's loans are inside the assessment area (AA).

Loan-to-Deposit Ratio

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

The bank's quarterly average LTD ratio over the 20 quarters since the previous CRA evaluation (September 2014 – June 2019) is 112.1 percent. The ratio ranged from a low of 101.5 percent at March 31, 2015, to a high of 122.3 percent at June 30, 2019, demonstrating an upward trend. The bank's average LTD ratio of 112.1 percent compares favorably to the average LTD ratio of 68.4 percent of two similar financial institutions in the bank's AAs.

Lending in Assessment Area

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

The bank originated and purchased 63.8 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The following table is based on the 2016, 2017, and 2018 Home Mortgage Disclosure Act (HMDA) data, which includes all home mortgage loans originated and purchased during the evaluation period (2016 – 2018). In addition, the table includes our random sample of 40 loans to small businesses reviewed during the evaluation period.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	348	63.4	201	36.6	549	46,833	63.6	26,812	36.4	73,645
Small Business	28	70.0	12	30.0	40	5,264	59.7	3,556	40.3	8,820
Total	376	63.8	213	36.2	589	52,097	63.2	30,368	36.8	82,465

Source: 2016 – 2018 HMDA Data; small business loan sample. Due to rounding, totals may not equal 100.0.

Description of Institution

New Carlisle Federal Savings Bank (NCFSB or bank) is a federally chartered mutual financial institution founded in 1883 and headquartered in New Carlisle, Ohio. The bank does not have a holding company. As of June 30, 2019, the bank has \$121.6 million in total assets and \$12.3 million in tier one capital. In addition to the main office in New Carlisle, the bank has two branches, one in Springfield, Ohio and the other in Tipp City, Ohio. The bank's offices in New Carlisle and Springfield are in Clark County, while the Tipp City branch is located in Miami County. As of the 2010 U.S. Census data, all three branches were located in middle-income geographies. As of the 2015 American Community Survey (ACS) U.S. Census data, the New Carlisle office is located in a moderate-income census tract and the other two branches are located in upper-income census tracts. Each office has a drive-up facility and automated teller machine (ATM). All three ATMs take deposits, but only for current bank customers. No branches were opened or closed since the previous CRA evaluation. The bank is currently building a new branch in Springfield, Ohio, but it will not be open until 2020. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

NCFSB has two AAs located in the state of Ohio, which is the bank's only rating area. The bank operates in and primarily lends within Clark and Miami Counties in Ohio. The bank's AA includes Clark County, Ohio (Springfield MSA AA), in its entirety, which is located in the Springfield, OH MSA 44220. The bank's AA also includes Miami County, Ohio (Dayton MSA AA), in its entirety, which is located in the Dayton, OH MSA 19380.

NCFSB serves its community with traditional deposit accounts and loans. As of June 30, 2019, NCFSB's net loans and leases totaled \$104.3 million, or 85.7 percent of total assets. The bank's loan originations and purchases during the evaluation period (2016 – 2018), based on the number of loans originated/purchased, are 62.8 percent residential real estate (home mortgage loans), 14.9 percent commercial/commercial real estate (small loans to businesses), and 22.3 percent consumer loans. The bank's loan originations and purchases during the evaluation period, based on the dollar amount of loans originated/purchased, are 63.8 percent home mortgage loans, 31.4 percent commercial/commercial real estate, and 4.8 percent consumer loans. The bank originated or purchased approximately \$78.2 million in home mortgage and \$38.5 million in commercial/commercial real estate loans during the evaluation period. As of the December 31, 2018 Call Report (Consolidated Reports of Condition and Income), the loan portfolio consisted of approximately 58.5 percent in residential real estate loans (including home equity lines of credit), 37.3 percent in commercial and commercial real estate loans, 2.0 percent in consumer loans, and 2.2 percent in farm loans. The bank's primary lending focus is residential real estate and small business lending.

There are no financial, legal, or other factors that impede NCFSB's ability to help meet the credit needs of its AAs. NCFSB's previous CRA rating was Satisfactory as of the CRA Performance Evaluation (PE) dated August 18, 2014.

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 (LMI) areas. We used the small savings association CRA evaluation procedures to assess the bank's performance. Based on discussions with bank management and the number and dollar volume of loan origination data supplied by the bank, residential real estate (home mortgage) and commercial/commercial real estate (small loans to businesses) loans are the bank's primary lending products and were evaluated under the Lending Test. We analyzed lending activity in full-year increments during the evaluation period, January 1, 2016 to December 31, 2018. The review included all home mortgage loans reported in the HMDA Loan Application Registers (LARs) for 2016, 2017, and 2018. We completed transaction testing on a random sample of small loans to businesses originated during the evaluation period for each AA. For the Lending Test, we selected 20 small loans to businesses originated in 2016 for each AA and 20 small loans to businesses originated in 2017 – 2018 for each AA, or all if less than 20 per year.

For analysis purposes, we compared the bank's lending performance with demographic data from the 2010 U.S. Census, 2015 ACS U.S. Census, and the 2016 and 2018 Dun and Bradstreet (D&B) data. The income designation of some census tracts in the AAs changed in 2017, based upon the 2015 ACS U.S. Census data. Due to the changes in demographic information during the evaluation period, we used the 2010 U.S. Census data for analysis and comparison purposes for loans originated/purchased in 2016 and the 2015 ACS U.S. Census data for loans originated/purchased in 2017 and 2018. We reviewed the 2016 loan data separately from the 2017 and 2018 loan data. No affiliate activity was included in this analysis. 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 bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, NCFSB has two AAs in the State of Ohio, and we completed a full-scope review of both AAs. A community profile for each AA is provided in the "Description of Institution's Operations in Ohio" section in the State of Ohio portion of this evaluation. Refer to the "Scope" section under the State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full-scope AAs.

Ratings

The bank's overall rating is based on the state of Ohio rating. NCFSB only operates in the state of Ohio. The State of Ohio rating is based on the performance in all of the bank's AAs. We completed a full-scope review of both AAs. Refer to the "Scope" section under the State Rating section for details regarding how the areas and loan products 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:

- The bank exhibits a reasonable geographic distribution of loans during the evaluation period.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- The LTD ratio is more than reasonable.
- A majority of the bank's loans are inside the bank's AA during the evaluation period.

Description of Institution's Operations in Ohio

NCFSB has two AAs located in the state of Ohio. The bank operates in and primarily lends within Clark and Miami Counties in Ohio. Bank management selected the AAs based on their targeted lending area and office locations. The bank's AA includes Clark County, Ohio (Springfield MSA AA), in its entirety, which is located in the Springfield, OH MSA 44220. The bank's second AA includes Miami County, Ohio (Dayton MSA AA), in its entirety, which is located in the Dayton, OH MSA 19380. The AAs are contiguous, meet the requirements of the regulation, and do not arbitrarily exclude any LMI areas. The bank has three office locations in Ohio, with an office in New Carlisle, Springfield, and Tipp

City. Springfield is the largest city and county seat in Clark County. Troy is the largest city and county seat in Miami County.

The underlying demographics changed in 2017 due to the 2015 ACS U.S. Census. The 2015 ACS U.S. Census data resulted in changes to the census tract classifications from the 2010 U.S. Census data. As of the 2010 U.S. Census data, the Springfield MSA AA consisted of six low-income, nine moderate-income, 16 middle-income, and 13 upper-income census tracts. As of the 2010 U.S. Census data, the Dayton MSA AA consisted of zero low-income, four moderate-income, 14 middle-income, and three upper-income census tracts. As of the 2015 ACS U.S. Census data, the Springfield MSA AA consisted of four low-income, 14 moderate-income, 16 middle-income, and ten upper-income census tracts. As of the 2015 ACS U.S. Census data, the Dayton MSA AA consisted of zero low-income, three moderate-income, 13 middle-income, and five upper-income census tracts.

As part of this CRA evaluation, we reviewed information provided from interviews with representatives from two affordable housing, social services, or economic development organizations that serve Clark and Miami Counties in Ohio. The contacts identified affordable housing as a credit need in the community. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Refer to the community profile for the State of Ohio AAs below for detailed demographics and other performance context information for each AA that received a full-scope review.

Springfield MSA AA

Economic conditions in Clark County, Ohio, are overall stable. As of the July 2019 Office of Workforce Development/Bureau of Labor Market Information statistics data, Clark County has an unemployment rate (not seasonally adjusted) of 4.9 percent, which is above the statewide Ohio's unemployment rate of 4.6 percent and nationwide rate of 4.0 percent. The AA has a diverse mix of industries, including manufacturing and services industries. Large employers in the Springfield MSA AA include Community Mercy Health Partners, Assurant Inc., Navistar, and Clark County Schools.

Competition in the AA is strong with national banks, savings associations, state banks, credit unions, and branches of larger financial institutions. According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2018, 83.9 percent of the bank's deposits are in the Springfield MSA AA (Clark County) and 16.1 percent are in the Dayton MSA AA (Miami County). According to the same report, NCFBSB has a 4.5 percent deposit market share in Clark County with \$69.1 million in total deposits and ranks eighth out of 12 financial institutions. Financial institutions with significant deposit market share in Clark County include Park National Bank, Huntington National Bank, and PNC Bank, National Association. The top three depository institutions account for 65.8 percent of total deposits in this AA. As of the 2015 ACS U.S. Census data, the 2017 peer mortgage data (HMDA data) shows NCFBSB with a 3.1 percent lending market share in the Springfield MSA AA, which is 12th out of 186 financial institutions. Primary home mortgage lenders in the Springfield MSA AA as of the 2017 peer mortgage data include Wright-Patt Credit Union, Wells Fargo Bank NA, Home City Federal Savings Bank, and US Bank, N.A.

According to 2010 U.S. Census data, the median housing value in the Springfield MSA AA was \$109,703. Based on the 2016 median family income of \$57,100, low-income families make less than

\$28,550 and moderate-income families make less than \$45,680. Overall median housing values are approximately 2.4 to 3.8 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 61,574 total housing units in the AA, of which 62.9 percent are owner-occupied and 26.7 percent are rental occupied units. Approximately 11.1 percent of the families and 14.2 percent of the households live below the poverty level.

According to 2015 ACS U.S. Census data, the median housing value in the Springfield MSA AA was \$103,522. Based on the 2017 median family income of \$54,500, low-income families make less than \$27,250 and moderate-income families make less than \$43,600. Overall median housing values are approximately 2.4 to 3.8 times the annual income of LMI families in the AA. Based on the 2018 median family income of \$65,300, low-income families make less than \$32,650 and moderate-income families make less than \$52,240. Overall median housing values are approximately 2.0 to 3.2 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 61,241 total housing units in the AA, of which 59.3 percent are owner-occupied and 30.2 percent are rental occupied units. Approximately 13.2 percent of the families and 16.8 percent of the households live below the poverty level.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA AA, 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	13.6	20.5	36.4	29.5	0.0
Population by Geography	138,333	10.4	16.2	41.1	32.4	0.0
Housing Units by Geography	61,574	10.6	17.2	41.4	30.9	0.0
Owner-Occupied Units by Geography	38,735	4.9	13.0	44.5	37.6	0.0
Occupied Rental Units by Geography	16,410	20.7	23.4	37.5	18.4	0.0
Vacant Units by Geography	6,429	19.1	26.5	32.4	22.1	0.0
Businesses by Geography	5,591	8.8	18.4	33.9	39.0	0.0
Farms by Geography	332	2.4	6.0	34.9	56.6	0.0
Family Distribution by Income Level	36,684	19.8	17.5	22.9	39.8	0.0
Household Distribution by Income Level	55,145	23.5	16.3	18.9	41.3	0.0
Median Family Income MSA - 44220 Springfield, OH MSA		\$53,678	Median Housing Value			\$109,703
			Median Gross Rent			\$641
			Families Below Poverty Level			11.1%

*Source: 2010 U.S. Census and 2016 D&B Data.
Due to rounding, totals may not equal 100.0.
(* The NA category consists of geographies that have not been assigned an income classification.*

Table A – Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA AA, 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	9.1	31.8	36.4	22.7	0.0
Population by Geography	136,827	7.4	27.0	40.9	24.7	0.0
Housing Units by Geography	61,241	7.8	27.2	40.5	24.5	0.0
Owner-Occupied Units by Geography	36,310	3.1	20.2	46.6	30.1	0.0
Occupied Rental Units by Geography	18,499	14.3	37.6	31.6	16.4	0.0
Vacant Units by Geography	6,432	15.2	37.1	31.3	16.5	0.0
Businesses by Geography	5,578	5.2	27.3	38.0	29.5	0.0
Farms by Geography	340	3.2	14.4	46.8	35.6	0.0
Family Distribution by Income Level	35,980	20.9	17.4	20.9	40.8	0.0
Household Distribution by Income Level	54,809	23.9	16.3	17.9	41.9	0.0
Median Family Income MSA - 44220 Springfield, OH MSA		\$55,198	Median Housing Value			\$103,522
			Median Gross Rent			\$698
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS Census and 2018 D&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>						

Dayton MSA AA

Economic conditions in Miami County, Ohio, are overall stable. As of the July 2019 Office of Workforce Development/Bureau of Labor Market Information statistics data, Miami County has an unemployment rate (not seasonally adjusted) of 4.0 percent, which is below or commensurate with the statewide and nationwide unemployment rates. The AA has a diverse mix of industries, including manufacturing and services industries. Large employers in the Dayton MSA AA include Upper Valley Medical Center, Clopay Building Products, and F & P America.

Competition in the AA is strong with national banks, savings associations, state banks, credit unions, and branches of larger financial institutions. According to the FDIC's Deposit Market Share Report as of June 30, 2018, 16.1 percent of the bank's total deposits are in the Dayton MSA AA (Miami County). According to that report, NCFBSB has a 0.9 percent deposit market share in Miami County with \$13.3 million in total deposits and ranks 14th out of 15 financial institutions. Financial institutions with significant deposit market share in Miami County include Fifth Third Bank, U.S. Bank National Association, Park National Bank, and JPMorgan Chase Bank, National Association. The top four depository institutions account for 67.1 percent of total deposits in this AA. As of the 2015 ACS U.S. Census data, the 2017 peer mortgage data shows NCFBSB with less than one percent lending market share in Miami County, which is 33rd out of 176 financial institutions. Primary home mortgage lenders in the Dayton MSA AA (Miami County) as of the 2017 peer mortgage data include Union Savings Bank, Wells Fargo Bank NA, U.S. Bank, N.A., and Wright-Patt Credit Union.

According to 2010 U.S. Census data, the median housing value in the Dayton MSA AA was \$138,929. Based on the 2016 median family income of \$59,500, low-income families make less than \$29,750 and moderate-income families make less than \$47,600. Overall median housing values are approximately 2.9 to 4.7 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 43,816 total housing units in the AA, of which 66.9 percent are owner-occupied and 26.9 percent are rental occupied units. Approximately 7.0 percent of the families and 9.0 percent of the households live below the poverty level.

According to 2015 ACS U.S. Census data, the median housing value in the Dayton MSA AA was \$136,433. Based on the 2017 median family income of \$63,600, low-income families make less than \$31,800 and moderate-income families make less than \$50,880. Overall, median housing values are approximately 2.7 to 4.3 times the annual income of LMI families in the AA. Based on the 2018 median family income of \$65,700, low-income families make less than \$32,850 and moderate-income families make less than \$52,560. Overall median housing values are approximately 2.6 to 4.2 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 44,266 total housing units in the AA, of which 65.3 percent are owner-occupied and 27.6 percent are rental occupied units. Approximately 9.8 percent of the families and 11.7 percent of the households live below the poverty level.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Dayton MSA AA, 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	19.0	66.7	14.3	0.0
Population by Geography	102,506	0.0	14.9	66.0	19.1	0.0
Housing Units by Geography	43,816	0.0	15.6	67.6	16.8	0.0
Owner-Occupied Units by Geography	29,306	0.0	13.3	66.1	20.6	0.0
Occupied Rental Units by Geography	11,781	0.0	22.1	69.6	8.2	0.0
Vacant Units by Geography	2,729	0.0	11.9	76.0	12.1	0.0
Businesses by Geography	5,196	0.0	14.3	66.2	19.5	0.0
Farms by Geography	368	0.0	9.8	76.1	14.1	0.0
Family Distribution by Income Level	28,364	17.8	18.7	23.2	40.3	0.0
Household Distribution by Income Level	41,087	20.0	15.9	18.7	45.3	0.0
Median Family Income MSA - 19380 Dayton, OH MSA		\$60,009	Median Housing Value			\$138,929
			Median Gross Rent			\$684
			Families Below Poverty Level			7.0%
<i>Source: 2010 U.S. Census and 2016 D&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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Dayton MSA AA, 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	14.3	61.9	23.8	0.0
Population by Geography	103,517	0.0	15.1	55.7	29.1	0.0
Housing Units by Geography	44,266	0.0	15.5	57.4	27.1	0.0
Owner-Occupied Units by Geography	28,906	0.0	13.8	55.1	31.1	0.0
Occupied Rental Units by Geography	12,229	0.0	19.3	61.5	19.2	0.0
Vacant Units by Geography	3,131	0.0	16.8	62.6	20.6	0.0
Businesses by Geography	5,428	0.0	12.2	59.9	28.0	0.0
Farms by Geography	355	0.0	8.2	73.0	18.9	0.0
Family Distribution by Income Level	27,826	18.4	18.1	22.1	41.4	0.0
Household Distribution by Income Level	41,135	20.2	16.4	18.3	45.1	0.0
Median Family Income MSA - 19380 Dayton, OH MSA		\$61,957	Median Housing Value			\$136,433
			Median Gross Rent			\$734
			Families Below Poverty Level			9.8%
<i>Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Ohio

We conducted a full-scope review of both AAs, the Springfield MSA AA and the Dayton MSA AA, to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The bank's AA includes Clark County, Ohio, in its entirety, and data in this AA was analyzed and presented as one AA for purposes of this evaluation. The bank's AA also includes Miami County, Ohio, in its entirety; data in this AA was analyzed and presented as one AA for purposes of this evaluation. Residential real estate and commercial/commercial real estate lending (small loans to businesses) are the bank's primary lending products. The review included an evaluation of all home mortgage loans reported in the HMDA LARs for 2016, 2017, and 2018 and a random sample of small loans to businesses in each AA during the evaluation period.

According to the FDIC's Deposit Market Share Reports as of June 30, 2018, 83.9 percent of the deposits are in the Springfield MSA AA and 16.1 percent are in the Dayton MSA AA. As of the 2016 – 2018 HMDA data, the bank originated 348 home mortgage loans inside the AAs during the evaluation period, with 81.0 percent (282 loans) in the Springfield MSA AA and 19.0 percent (66 loans) in the Dayton MSA AA. A significant majority of the bank's lending and deposit activity is in the Springfield MSA AA; therefore, we placed more weight on the Springfield MSA AA during this evaluation.

The bank's primary lending focus is residential real estate and commercial/commercial real estate lending. As stated above, the bank's loan originations and purchases during the evaluation period for

the bank's primary loan products, based on the dollar amount of loans originated/purchased, are 63.8 percent home mortgage loans and 31.4 percent commercial/commercial real estate. The bank originated or purchased approximately \$78.2 million in home mortgage and \$38.5 million in commercial/commercial real estate loans during the evaluation period. Our analysis includes all home mortgage loans originated/purchased in 2016 – 2018. We placed more weight on the bank's residential real estate lending as it accounts for more than twice the dollar volume of commercial/commercial real estate loan originations/purchases during the evaluation period.

Refer to appendix A for a list of all AAs that we reviewed.

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the AAs.

As of the 2010 U.S. Census data, the bank had six low-income and nine moderate-income census tracts in the Springfield MSA AA. As of the 2015 ACS U.S. Census data, the bank has four low-income and 14 moderate-income census tracts in the Springfield MSA AA.

There are no low-income census tracts in the Dayton MSA AA. As of the 2010 U.S. Census data, the bank had four moderate-income census tracts in the Dayton MSA AA. As of the 2015 ACS U.S. Census data, the bank has three moderate-income census tracts in the Dayton MSA AA.

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

Home Mortgage Loans

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

The bank exhibits a reasonable geographic distribution of home mortgage loans in the AAs.

The bank's home mortgage lending in the Springfield MSA AA is overall reasonable. In 2016, the bank originated 1.9 percent of the loans in the Springfield MSA AA in low-income census tracts, which compares similarly to the percentage of home mortgage loans of other home mortgage lenders (aggregate data). The bank originated 4.8 percent of the loans in the Springfield MSA AA in moderate-income census tracts, which is below both aggregate and demographic (percentage of owner-occupied housing units) data. In 2017 – 2018, the bank originated 3.4 percent of the loans in the Springfield MSA AA in low-income census tracts, which is above both aggregate and demographic data. The bank originated 19.1 percent of the loans in the Springfield MSA AA in moderate-income census tracts, which is within a reasonable percentage of aggregate and demographic data.

The bank's home mortgage lending in the Dayton MSA AA reflects poor distribution. There are no low-income census tracts in this AA. In 2016, the bank originated 4.8 percent of the loans in the Dayton MSA AA in moderate-income census tracts, which is below both aggregate and demographic data. In 2017 – 2018, the bank originated 2.2 percent of the loans in the Dayton MSA AA in moderate-income census tracts, which is also well below both aggregate and demographic data. However, the bank only originated 21 home mortgage loans in 2016 and a total of 45 home mortgage loans in 2017 – 2018 in the Dayton MSA AA. The bank has one branch in this AA. As of the 2015 ACS U.S. Census data, the moderate-income census tracts are not located near the bank's branch in Tipp City, Ohio.

In total, the bank originated 348 home mortgage loans inside the AA during the evaluation period, with 81.0 percent (282 loans) in the Springfield MSA AA and 19.0 percent (66 loans) in the Dayton MSA AA. The bank has two offices in the Springfield MSA AA. Since a significant majority of the lending and deposit activity is in the Springfield MSA AA, we placed more weight on this AA.

Small Loans to Businesses

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

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

The bank's small business lending in the Springfield MSA AA reflects overall excellent distribution. In 2016, the bank did not originate any loans in our sample to small businesses in low-income census tracts in the Springfield MSA AA. However, the bank originated 26.3 percent of the loans in our 2016 loan sample in the Springfield MSA AA in moderate-income census tracts, which significantly exceeds the percentage of loans to small businesses of all reporting lenders (aggregate data) and the percentage of businesses in moderate-income tracts (demographic data). In 2017 – 2018, the bank originated 15.0 percent of the loans in our sample in the Springfield MSA AA in low-income census tracts, which significantly exceeds both aggregate and demographic data. The bank originated 25.0 percent of the loans in our sample in the Springfield MSA AA in moderate-income census tracts, which is commensurate with demographic and aggregate data.

The bank's small business lending in the Dayton MSA AA reflects excellent distribution. There was not a sufficient sample size to conclude on lending to small businesses in the Dayton MSA AA in 2016. There are no low-income census tracts in the Dayton MSA AA. In 2017 – 2018, the bank originated 15.0 percent of the loans in our sample in the Dayton MSA AA in moderate-income census tracts, which exceeds both aggregate and demographic data.

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 of different sizes, given the product lines offered by the bank.

We placed more weight on home mortgage lending because 63.8 percent (by dollar volume) of the total loan originations and purchases during the evaluation period were home mortgage loans. Commercial/commercial real estate lending represented approximately 31.4 percent of total loan originations and purchases during the evaluation period.

Home Mortgage Loans

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

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

The bank's home mortgage lending to LMI borrowers in the Springfield MSA AA is reasonable. In 2016, the bank's lending to low-income borrowers in the Springfield MSA AA was 5.8 percent, which is reasonable when compared to the aggregate data of 7.6 percent. The bank's lending to moderate-income borrowers in the Springfield MSA AA was 18.3 percent, which slightly exceeds both demographic (the percentage of AA families) and aggregate data. In 2017 – 2018, the bank's lending to low-income borrowers in the Springfield MSA AA was 7.9 percent, which exceeds the aggregate data of 6.5 percent but is less than the demographic data of 20.9 percent. The bank's lending to moderate-income borrowers in the Springfield MSA AA was 16.9 percent, which is reasonable when compared to demographic and aggregate data.

The bank's home mortgage lending to LMI borrowers in the Dayton MSA AA is overall reasonable. In 2016, the bank did not originate or purchase any loans to low-income borrowers in the Dayton MSA AA. The bank's lending to moderate-income borrowers in the Dayton MSA AA was 19.0 percent, which exceeds both demographic and aggregate data. In 2017 – 2018, the bank's lending to low-income borrowers in the Dayton MSA AA was 6.7 percent, which is reasonable when compared to the aggregate data of 7.8 percent. The bank's lending to moderate-income borrowers in the Dayton MSA AA was 8.9 percent, which is below demographic and aggregate data.

As discussed above, a significant majority of the lending and deposit activity is in the Springfield MSA AA; therefore, we placed more weight on the Springfield MSA AA. We note that the poverty rates for families below the poverty level in the Springfield MSA AA of 11.1 percent in 2016 and 13.2 percent in 2018 may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards. The poverty rates for the Dayton MSA AA were 7.0 percent in 2016 and 9.8 percent in 2018. We also considered the median price of housing in the AAs relative to the maximum income of LMI borrowers, which may demonstrate a barrier to homeownership. Refer to the "Description of Institution's Operations in Ohio" for more details on the median price of housing in the AAs.

Small Loans to Businesses

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

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

The bank's lending to small businesses in the Springfield MSA AA is excellent. In our 2016 loan sample, the bank originated 78.9 percent of the loans to businesses with annual gross revenues less than \$1 million, which compares favorably with the aggregate data (the percentage of loans to small businesses of all reporting lenders) of 51.2 percent. In 2017 – 2018, the bank originated 85.0 percent of

the loans to businesses with annual gross revenues less than \$1 million, which also compares favorably with the aggregate data of 53.6 percent.

There was not a sufficient sample size to conclude on lending to small businesses in the Dayton MSA AA in 2016. In 2017 – 2018, the bank’s lending to small businesses in the Dayton MSA AA was excellent. The bank originated 75.0 percent of the loans in our sample to businesses with annual gross revenues less than \$1 million, which compares favorably with the aggregate data of 51.4 percent.

Responses to Complaints

The bank has not received any complaints about its CRA performance in helping to meet the AAs’ credit needs 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”.

Time Period Reviewed:	01/01/2016 – 12/31/2018	
Bank Products Reviewed:	Home mortgage loans and small loans to businesses	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
Springfield MSA AA	Full-Scope	The AA includes all the census tracts in Clark County, Ohio, which is located in the Springfield, OH MSA 44220.
Dayton MSA AA	Full-Scope	The AA includes all the census tracts in Miami County, Ohio, which is located in the Dayton, OH MSA 19380.

Appendix B: Summary of State Ratings

RATINGS: NEW CARLISLE FEDERAL SAVINGS BANK	
Overall Bank:	Lending Test Rating
New Carlisle Federal Savings Bank	Satisfactory
State:	
Ohio	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division (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.

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

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

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

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

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

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 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		
	#	\$	% 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
Springfield MSA AA	104	14,181	100.0	3,773	4.9	1.9	2.4	13.0	4.8	10.2	44.5	47.1	45.3	37.6	46.2	42.0	0.0	0.0	0.0
Dayton MSA AA	21	3,382	100.0	3,763	0.0	0.0	0.0	13.3	4.8	12.2	66.1	76.2	60.2	20.6	19.0	27.6	0.0	0.0	0.0

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data; 2016 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0.*

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Springfield MSA AA	178	22,656	100.0	3,228	3.1	3.4	1.5	20.2	19.1	20.1	46.6	47.8	46.7	30.1	29.8	31.7	0.0	0.0	0.0
Dayton MSA AA	45	6,614	100.0	3,187	0.0	0.0	0.0	13.8	2.2	12.3	55.1	46.7	51.1	31.1	51.1	36.6	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Springfield MSA AA	104	14,181	100.0	3,773	19.8	5.8	7.6	17.5	18.3	17.3	22.9	26.9	19.3	39.8	46.2	26.3	0.0	2.9	29.5
Dayton MSA AA	21	3,382	100.0	3,763	17.8	0.0	5.8	18.7	19.0	16.0	23.2	14.3	19.7	40.3	61.9	36.0	0.0	4.8	22.5

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data; 2016 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Springfield MSA AA	178	22,656	100.0	3,228	20.9	7.9	6.5	17.4	16.9	18.6	20.9	27.0	22.5	40.8	36.0	33.3	0.0	12.4	19.1
Dayton MSA AA	45	6,614	100.0	3,187	18.4	6.7	7.8	18.1	8.9	17.9	22.1	15.6	24.2	41.4	57.8	36.7	0.0	11.1	13.4

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Springfield MSA AA	19	3,790	100.0	1,527	8.8	0.0	7.3	18.4	26.3	16.2	33.9	47.4	32.3	39.0	26.3	44.2	0.0	0.0	0.0
Dayton MSA AA	8	838	100.0	1,549	0.0	0.0	0.0	14.3	25.0	14.1	66.2	62.5	61.1	19.5	12.5	24.9	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			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		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Springfield MSA AA	20	4,033	100.0	1,511	5.2	15.0	4.4	27.3	25.0	27.5	38.0	45.0	36.6	29.5	15.0	31.4	0.0	0.0	0.0
Dayton MSA AA	20	3,739	100.0	1,533	0.0	0.0	0.0	12.2	15.0	10.8	59.9	60.0	56.1	28.0	25.0	33.1	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0.

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		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Springfield MSA AA	19	3,790	100.0	1,527	78.2	78.9	51.2	6.5	21.1	15.3	0.0	
Dayton MSA AA	8	838	100.0	1,549	80.3	37.5	48.7	6.6	62.5	13.1	0.0	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.</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		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Springfield MSA AA	20	4,033	100.0	1,511	76.9	85.0	53.6	7.0	15.0	16.1	0.0	
Dayton MSA AA	20	3,739	100.0	1,533	79.7	75.0	51.4	7.0	25.0	13.4	0.0	
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.</i>												