# **PUBLIC DISCLOSURE**

April 15, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

1st National Bank Charter Number: 8709

730 East Main Street Lebanon, OH 45036

Office of the Comptroller of the Currency

West Lake Center 4555 Lake Forest Drive, Suite 520 Blue Ash, OH 45242-3760

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

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# **Overall CRA Rating**

### Institution's CRA Rating: This institution is rated Satisfactory.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is primarily based on the Cincinnati MSA AA. Operations in the Kettering MSA AA were reviewed but were weighted less significantly given the limited time of operations.
- The bank exhibits a reasonable distribution of home loans to individuals of different income levels.
- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank's loans are inside its assessment areas (AAs).

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-todeposit ratio is reasonable.

The bank averaged an LTD ratio of 77.1 percent over 17 quarters (December 31, 2017, to December 31, 2021) since the prior CRA evaluation. The bank's quarterly LTD ratio ranged from a low of 63.3 percent (September 30, 2021) to a high of 92.1 percent (September 30, 2018). The average LTD ratio for similarly situated banks in Butler, Clermont, Hamilton, Montgomery, and Warren counties with total assets between \$100 million and \$250 million (nine financial institutions) was 84 percent for the same time period, ranging from 13 percent to 120.5 percent. Deposits increased at the beginning of the COVID-19 pandemic, causing a decline in the LTD ratio. Similar to peer, the bank's LTD ratio further declined in 2021 due to decreased loan demand.

## Lending in Assessment Area

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

The bank originated and purchased 65.9 percent of its total loans by number and 69.8 percent of its total loans by dollar 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.

	N	umber	of Loans			Dollar	: Amo \$(0	unt of Loa 00s)	ins	
Loan Category	Insi	de	Outs	ide	Total	Insid	le	Outsi	de	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										-
2019	593	63.9	335	36.1	928	138,123	68.6	63,344	31.4	201,467
2020	1,150	67.8	547	32.2	1,697	288,452	71.9	112,747	28.1	401,198
2021	754	64.7	411	35.3	1,165	182,253	67.6	87,274	32.4	269,527
Subtotal	2,497	65.9	1,293	34.1	3,790	608,828	69.8	263,365	30.2	872,192
Total	2,497	65.9	1,293	34.1	3,790	608,828	69.8	263,365	30.2	872,192

Lending within the bank's AAs remained relatively consistent over the last three years. In 2021, the bank opened a branch in Centerville, Ohio. Given this, the bank's AA was expanded to include to include the Kettering MSA AA. In analyzing lending within the assessment area, the Kettering MSA AA is not considered inside the bank's AA for 2019 and 2020.

## **Description of Institution**

1<sup>st</sup> National Bank (1<sup>st</sup> National or bank) is a full-service community bank located in Lebanon, OH. Lebanon, OH is a community located northeast of Cincinnati. As of December 31, 2021, 1<sup>st</sup> National had \$250 million in total assets, with tier one capital of \$19.2 million.

1<sup>st</sup> National is a single-state financial institution with 11 branch locations in Ohio. These branch locations include the following cities: three in Lebanon (Warren County), one in Cincinnati (Hamilton County), one in Mason (Warren County), one in Maineville (Warren County), one in Franklin (Warren County), one in Morrow (Warren County), one in Loveland (Clermont County), and one in Liberty Township (Butler County). In 2021, the bank opened a new location in Centerville, OH (Montgomery County). 1<sup>st</sup> National has two standalone automated teller machines (ATMs) locations in Warren County.

The bank has no holding company. Additionally, there were no merger or acquisition activities that affected the scope of the bank's operations during the evaluation period. 1st National Bank LLC is an operating subsidiary established only to hold and manage a portion of the bank's investment portfolio. Activities for this operating subsidiary do not have a significant impact on the CRA evaluation.

As of 2021, the bank operates in two AAs.

The Cincinnati MSA AA includes portions of Butler, Clermont, Hamilton Counties, and all of Warren County. Within the Cincinnati MSA, the AA includes 11 low-, 28 moderate-, 64 middle-, and 74 upper-

income tracts. Based on the 2021 census tract (CT), one branch is located in a moderate-income tract, three are located in middle-income tracts, and six are located in upper-income tracts.

The Kettering MSA AA was added in 2021 and includes Montgomery County. The Kettering MSA AA includes limited low-to-moderate tract exposure, with no low-, one moderate-, eight middle-, and 12 upper-income tracts. The branch is located in an upper-income tract.

Mortgage banking, including servicing, is the primary business line for the bank and has been the board's strategic focus since 2010. As of October 2021, the servicing portfolio was \$685.7 million with total loans sold year-to-date of \$22.2 million.

There are no financial, legal, or other factors that would hinder 1<sup>st</sup> National's ability to meet the credit needs of the AAs. While the Centerville location will be reviewed in the report, given the limited market operations, more weight was placed on the performance in the Cincinnati MSA AA. The bank received a "Satisfactory" rating in its previous CRA performance evaluation, dated December 4, 2017.

## Scope of the Evaluation

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

The OCC conducted a full-scope Community Reinvestment Act (CRA) evaluation to assess the bank's record of meeting credit needs within the Cincinnati MSA AA and Kettering MSA AA. Given the recent introduction into the Kettering MSA AA, more weight was placed on performance in the Cincinnati MSA AA. For CRA analysis purposes, the bank's primary lending product is residential real estate loans. The OCC reviewed lending activity from January 1, 2019, to December 31, 2021. The evaluation included a review of all originated and purchased home mortgage loans for 2019, 2020, and 2021. The OCC used the loans originated and purchased inside the AA to evaluate the bank's performance relative to the geographic and borrower-income distribution.

For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census data. Please refer to the table in appendix A for the 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 AAs within that state was selected for a fullscope review. For purposes of this evaluation, the bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### Ratings

The bank's overall rating is based on activity within the state of Ohio, as this is the only state where the bank is located. The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## **State Rating**

## State of Ohio

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

#### The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- 1<sup>st</sup> National exhibits a reasonable distribution of loans to individuals of different income levels.
- The LTD ratio is reasonable given the bank's size, financial condition, and AA credit needs.
- A majority of the loans were made in the bank's AA.

## **Description of Institution's Operations in Ohio**

1<sup>st</sup> National operates within two assessment areas within these two MSAs: Cincinnati OH-KY-IN MSA #17140 (Cincinnati MSA AA) and Dayton-Kettering OH MSA #19430 (Kettering MSA AA).

Cincinnati MSA AA

Ass	essment Area	: Cincinna	ti MSA AA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	179	6.1	15.6	35.8	41.3	1.1
Population by Geography	847,555	3.6	11.8	33.9	50.2	0.5
Housing Units by Geography	352,853	4.3	13.4	36.0	46.4	0.0
Owner-Occupied Units by Geography	229,900	2.0	9.0	34.4	54.6	0.0
Occupied Rental Units by Geography	95,752	8.0	21.9	39.6	30.5	0.0
Vacant Units by Geography	27,201	11.0	20.3	36.4	32.3	0.0
Businesses by Geography	66,282	3.7	11.6	31.0	53.7	0.0
Farms by Geography	1,779	1.4	9.5	39.6	49.5	0.0
Family Distribution by Income Level	221,051	16.7	14.6	19.3	49.4	0.0
Household Distribution by Income Level	325,652	19.8	13.9	16.5	49.8	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$69,949	Median Hou	sing Value		\$186,751
			Median Gro	ss Rent		\$838
			Families Be	low Poverty L	level	7.0%

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

The Cincinnati MSA AA includes 179 census tracts. 1<sup>st</sup> National operates in a portion of Butler, Clermont, and Hamilton counties, and all of Warren County. The AA meets the requirement of the regulation and does not arbitrarily exclude any low- and moderate- income (LMI) areas. As of 2021, the bank has ten branch locations within the Cincinnati MSA AA. Seven are in Warren County and one is in Hamilton, Clermont, and Butler County each. All ten branches accept on-site deposits. In addition to these branches, there are two ATM locations within Warren County.

Based on the 2015 ACS U.S. Census data, within the Cincinnati MSA AA there are 11 low-, 28 moderate-, 64 middle-, and 74 upper-income CTs. There were no changes in the AA during the review period. The median housing value in the Cincinnati MSA AA was \$186,751. The median family income was \$69,949, and low-income families earn less than \$40,950. This means that the median housing values is at least 4.6 times the annual income of low-income families within the AA. There are 352,853 total units in the AA, of which 65.2 percent are owner-occupied and 29.4 percent are rental units. The poverty rate is high at 7 percent of families.

During the evaluation period, unemployment in the local economy increased due to COVID-19. Unemployment levels in 2021 declined from the high point in 2020. Hamilton County had the highest unemployment rates in the AA of 7.9 percent and 4.9 percent, during 2020 and 2021, respectively. Throughout the review period, unemployment within all four counties remained below statewide unemployment. Statewide unemployment for 2021 was 5.1 percent, while the national unemployment average was 5.3 percent. Major employers within the bank's assessment area include P&G, Macy's, Warren County, King's Island, and AK Steel.

1<sup>st</sup> National operates in a very competitive market against various national and regional banks. According to the Federal Deposit Insurance Corporation (FDIC) Market Share Report as of June 30, 2021, there are 46 deposit-taking financial institutions in the Cincinnati MSA AA. 1<sup>st</sup> National has the 20th largest share with \$214 million in deposits, which represent 0.15 percent deposit market share. The top five financial institutions based on market share include: US Bank, NA; Fifth Third Bank, NA; PNC Bank, NA; First Financial Bank; and Huntington National Bank.

A community contact within Hamilton County stated that the biggest issue is preserving existing affordable homeownership with the increase in gentrification and displacement of long-term residents as housing values increase. The community contact stated that there are significant areas for bank involvement in LMI communities. Additionally, financial education, particularly on credit card and fintech products, could be more consistently provided in the assessment area.

Ass	sessment Ar	ea: Kettern	ng MSA AA	î	r	
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	4.8	38.1	57.1	0.0
Population by Geography	100,474	0.0	2.1	43.8	54.0	0.0
Housing Units by Geography	45,267	0.0	2.3	46.4	51.3	0.0
Owner-Occupied Units by Geography	29,484	0.0	0.7	39.7	59.6	0.0
Occupied Rental Units by Geography	13,146	0.0	5.6	59.9	34.5	0.0
Vacant Units by Geography	2,637	0.0	2.5	54.6	42.8	0.0
Businesses by Geography	8,754	0.0	1.3	41.5	57.2	0.0
Farms by Geography	190	0.0	1.6	35.3	63.2	0.0
Family Distribution by Income Level	27,458	14.0	12.9	16.8	56.3	0.0
Household Distribution by Income Level	42,630	16.2	13.2	15.9	54.7	0.0
Median Family Income MSA - 19430 Dayt Kettering, OH MSA	ton-	\$61,957	Median Housi	ng Value		\$179,581
			Median Gross	Rent		\$879
			Families Below	w Poverty Lev	el	7.0%

#### Kettering MSA AA

The Kettering MSA AA includes 21 census tracts. The AA meets the requirement of the regulation and does not arbitrarily exclude any LMI areas. The bank operates within a small portion of the MSA in Montgomery County. As of 2021, the bank has only one deposit-taking branch location within the Kettering MSA AA. There are no standalone ATM locations.

Based on the 2015 ACS U.S. Census data, within the Kettering MSA AA there are no low-, one moderate-, eight middle-, and 12 upper-income CTs. The median housing value in the Kettering MSA AA was \$179,581. The median family income was \$75,700, and low-income families earn less than \$37,850. This means that the median housing values is at least 4.7 times the annual income of low-income families within the AA. There are 45,267 total units in the AA, of which 65.1 percent are owner-occupied and 31.7 percent are rental units. The poverty rate is high as 7 percent of families.

Unemployment within Montgomery County was 5.6 percent during 2021. This exceeds statewide unemployment for 2021 of 5.1 percent and national unemployment average of 5.3 percent. Major employers within the bank's assessment area include Premier Health Partners, Kettering Health Network, and Montgomery County.

1<sup>st</sup> National operates in a very competitive market against various national and regional banks. According to the Federal Deposit Insurance Corporation (FDIC) Market Share Report as of June 30, 2021, there are 22 deposit-taking financial institutions in the Kettering MSA AA. 1<sup>st</sup> National has the lowest share with \$464,000 in deposits, which represent 0 percent of the deposit market share. This is reasonable given that the branch was open in 2021. The top five financial institutions based on market share include: Fifth Third Bank, NA; JP Morgan Chase, NA; PNC Bank, NA; KeyBank, NA; and US Bank NA.

A community contact within Montgomery County stated that the biggest issue is high unemployment from COVID-19, however the economy is improving. The most significant impact financial institutions can have in the area is providing capital to small businesses.

## Scope of Evaluation in Ohio

The OCC performed a full-scope review of the Cincinnati MSA AA and Kettering MSA AA. The data was analyzed and presented as two separate AAs for purposes of this performance evaluation. The bank's primary product is residential real estate loans and was evaluated under the Lending Test. As discussed above, the OCC placed more weight on the Cincinnati MSA AA given the recent introduction in operations in the Kettering MSA AA.

## **Lending Test**

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

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

Based on full scope reviews, the bank's performance within both the Cincinnati MSA AA and the Kettering MSA AA is satisfactory.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels within both the Cincinnati MSA AA and the Kettering MSA AA.

### 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 OCC compared the percentage of home mortgage loans that 1<sup>st</sup> National made to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data) in each AA, placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data) in each AA, as demonstrated by HMDA aggregate data.

Within the Cincinnati MSA AA, the bank's loans to moderate-income borrowers were 10.2 percent. This is nearing aggregate data (13.5 percent) but remains below demographic data (14.6 percent). This performance is the primary reason why the OCC concluded reasonable distribution in this AA. The bank originated only 2.8 percent of loans to low-income borrowers. This is below the aggregate data (4.8 percent) and well below the geographic data (16.7 percent) in this MSA. The OCC noted that the poverty rate for families is high at 7 percent, which helps explain why both bank performance and aggregate data is well below the demographic data for low-income families.

Within the Kettering MSA, the bank originated 10 percent of loans to moderate-income borrowers. This is only slightly below the aggregate data (10.7 percent) and geographic data (12.9 percent). The bank did not originate any loans to low-income borrowers in this AA. Aggregate data for low-income borrowers was 2.7 percent, again well below the demographic data of14 percent. The OCC noted that the poverty rate for families is also high in this AA at 7 percent, explaining why the bank performance and aggregate data is well-below the demographic data for low-income families.

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

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

### Home Mortgage Loans

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

The OCC compared the percentage of home mortgage loans that 1<sup>st</sup> National made to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data) in each AA, placing emphasis on lending in LMI geographies. There are 11 low- and 28 moderate-income tracts in the Cincinnati MSA AA. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders in each AA, as demonstrated by HMDA aggregate data.

1<sup>st</sup> National has originated a low amount of home mortgage loans inside LMI communities in the Cincinnati MSA AA. The bank originated or purchased 0.5 percent of its mortgage loans in low-income CTs, which is below the aggregate percentage (1.1 percent) of mortgage loans in low-income CTs and below the demographic data (2 percent). Additionally, the bank originated 3.1 percent of its mortgage loans in moderate-income CTs, which also remains significantly below the aggregate percent (6.4 percent) of mortgage loans and demographic data (9 percent).

1<sup>st</sup> National has originated a reasonable amount of home mortgage loans inside the Kettering MSA AA. The bank did not originate or purchase any loans in the moderate-income CTs. Aggregate data shows only 0.3 percent of mortgage loans originated in the AA were made in moderate-income CTs. Demographic data is also below one percent (0.7 percent). There was limited opportunity to originate loans in one moderate-income CT. There are no low-income CTs in the AA.

### Lending Gap Analysis

There were no unexplained conspicuous lending gaps identified during the evaluation period.

### **Responses to Complaints**

There were no CRA-related complaints received 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:	(01/01/2019 - 12/31/2021)	
<b>Bank Products Reviewed:</b>	Home mortgage	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
(Name of Affiliate (Abbreviation)) List of Assessment Areas and Type	of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
Ohio		
Cincinnati MSA AA	Full-Scope	Portions of Butler, Clermont, and Hamilton Counties All of Warren County
Kettering MSA AA	Full-scope	Only for 2021. Only includes Montgomery County

# Appendix B: Summary of MMSA and State Ratings

RATING	S 1 <sup>st</sup> National Bank
Overall Bank:	Lending Test Rating
1 <sup>st</sup> National 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.

Appendix C-2

**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.

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

- Table S.Assessment Area Distribution of Loans to Farms by Income Category of the<br/>Geography The percentage distribution of the number of small loans (less than or equal<br/>to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,<br/>and upper-income geographies compared to the percentage distribution of farms (regardless<br/>of revenue size) throughout those geographies. The table also presents aggregate peer data<br/>for the years the data is available. Because aggregate small farm data are not available for<br/>geographic areas smaller than counties, it may be necessary to use geographic areas larger<br/>than the bank's assessment area.
- Table T.Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -<br/>Compares the percentage distribution of the number of small loans (loans less than or equal<br/>to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1<br/>million or less to: 1) the percentage distribution of farms with revenues of greater than \$1<br/>million; and, 2) the percentage distribution of farms for which revenues are not available.<br/>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<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of households in those geographies.
- Table V.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of households by income level in each MMSA/assessment area.

	Tota	l Home Mo	ortgage	Loans	Low-I	ncome	Tracts	Moderat	e-Incor	ne Tracts	Middle	-Incom	e Tracts	Upper	-Incom	e Tracts		ailable- Tracts	-Income
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		00 0	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		00 0	% of Owner- Occupied Housing Units		
Cincinnati MSA AA	2,467	603,774	100.0	60,763	2.0	0.5	1.1	9.0	3.1	6.4	34.4	25.0	31.2	54.6	71.4	61.3	0.0	0.0	0.0
Total	2,467	603,774	100.0	60,763	2.0	0.5	1.1	9.0	3.1	6.4	34.4	25.0	31.2	54.6	71.4	61.3	0.0	0.0	0.0

	]	Fotal Ho I	me Mor Loans	tgage	Low-l	Income	Tracts	Moderat	e-Incor	ne Tracts	Middle	-Incom	e Tracts	Upper	Incom	e Tracts	Not Av	ailable- Tracts	Income
Assessment Area: Kettering	#	\$		Overall Market	Occunied	% Bank Loans	00 0		% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		00 0	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate
Kettering MSA AA	30	5,053	100.0	6,608	0.0	0.0	0.0	0.7	0.0	0.3	39.7	43.3	33.9	59.6	56.7	65.8	0.0	0.0	0.0
Total	30	5,053	100.0	6,608	0.0	0.0	0.0	0.7	0.0	0.3	39.7	43.3	33.9	59.6	56.7	65.8	0.0	0.0	0.0

	Tota	al Home Mo	ortgage	Loans	Low-In	come B	orrowers		lerate-I Borrow		Middle-l	ncome	Borrowers	Upper-I	ncome	Borrowers		vailable Borrow	e-Income ers
Assessment Area:	#	\$	% of Total	Overall Market	% Familie s	% Bank Loan s	Aggregat e												
Cincinnati MSA AA	2,467	603,774	100.0	60,763	16.7	2.8	4.8	14.6	10.2	13.5	19.3	19.4	19.1	49.4	64.7	48.3	0.0	3.0	14.3
Total	2,467	603,774	100.0	60,763	16.7	2.8	4.8	14.6	10.2	13.5	19.3	19.4	19.1	49.4	64.7	48.3	0.0	3.0	14.3

	Tota	al Home	Mortgag	ge Loans	Low-In	come Bo	orrowers		lerate-II Borrowe		Middle-I	ncome	Borrowers	Upper-I	ncome l	Borrowers		ailable- Borrowe	-Income ers
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Kettering MSA AA	30	5,053	100.0	6,608	14.0		2.7	12.9	10.0	10.7	16.8	46.7	18.2	56.3	43.3	53.6	0.0		14.8
Total	30	5,053	100.0	6,608	14.0		2.7	12.9	10.0	10.7	16.8	46.7	18.2	56.3	43.3	53.6	0.0		14.8