

PUBLIC DISCLOSURE

December 2, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Killbuck Savings Bank Company
RSSD# 1017425

165 North Main Street
Killbuck, Ohio 44637

Federal Reserve Bank of Cleveland

P.O. Box 6387
Cleveland, Ohio 44101-1387

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S CRA RATING: Satisfactory
The Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

The major factors and criteria contributing to this rating include:

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs;
- A majority of loans and other lending-related activities are in the assessment area;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income) and an excellent penetration to businesses and farms of different revenue sizes given the demographics of the assessment areas;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area;
- There were no CRA-related complaints filed against the bank since the previous CRA examination; and,
- The bank's community development performance demonstrates an excellent responsiveness to the community development needs of the assessment area, considering the bank's capacity and the need and availability of such opportunities in the bank's assessment area.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination procedures for Intermediate Small Institutions were utilized to evaluate The Killbuck Savings Bank Company's (Killbuck) Community Reinvestment Act (CRA) performance under Regulation BB. The evaluation considered CRA performance context, including Killbuck's asset size, financial condition, business strategy and market competition, as well as assessment area demographic and economic characteristics, and credit needs. Under the lending test, lending performance was evaluated from January 1, 2018 – December 31, 2018 for small business, small farm, closed-end residential mortgage, and consumer (home equity lines of credit, motor vehicle, other secured and unsecured) loans. Other secured and unsecured loans were combined in order to conduct a meaningful analysis. Under the community development test, community development activities funded between April 5, 2016 – December 2, 2019 were assessed and qualified investments funded during a prior evaluation period, but still outstanding as of November 30, 2019 were also considered.

The following table shows the volume and distribution of loans originated within Killbuck's assessment area during the evaluation period:

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
Small Business	762	\$110,317
Motor Vehicle	224	\$2,858
Home Equity	187	\$15,143
Small Farm	161	\$12,389
Residential Mortgage	144	\$22,109
Other Secured/Unsecured	133	\$1,376
Totals	1,611	\$164,191

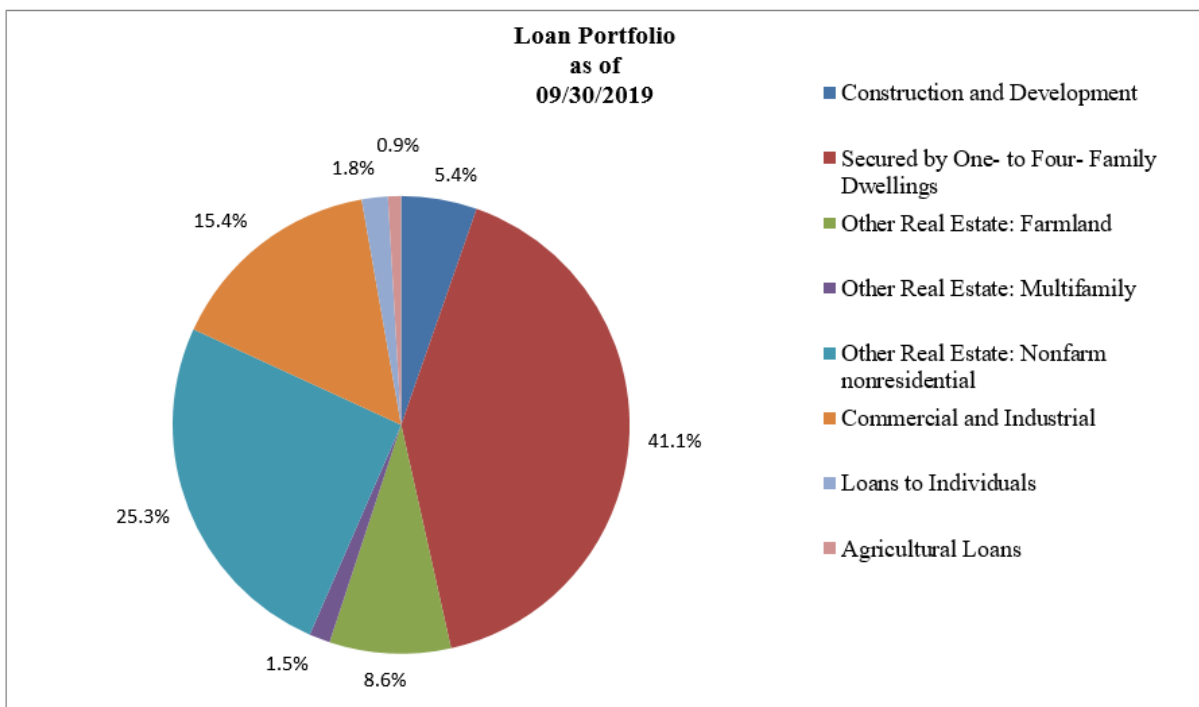
Based on the total loan volume by number and dollar amount within the assessment area, small business loans received the greatest weight, followed by residential mortgage, home equity, small farm, motor vehicle, and other secured and other unsecured loans.

Borrower distribution received greater weight than geographic distribution primarily because the majority of the assessment area is comprised of middle-income census tracts. There are no low-income census tracts and only two moderate-income census tracts in the bank's delineated CRA assessment area.

DESCRIPTION OF INSTITUTION

Killbuck is a community bank headquartered in Killbuck, Ohio. Killbuck is a wholly owned subsidiary Killbuck Bancshares, Inc., located in Killbuck, Ohio. Killbuck has total assets of \$557.7 million as of September 30, 2019. In addition to its main office in Killbuck, Ohio (Holmes County), the bank has nine additional offices and a loan production office. Five offices and a loan production office are in Holmes County of which four offices and the loan production office are in Millersburg, Ohio and the remaining office is in Berlin, Ohio. Two offices are in Knox County in Danville, Ohio and Howard, Ohio. One office is in Tuscarawas County in Sugarcreek, Ohio. The remaining office is in Wayne County in Fredericksburg, Ohio. Each office has a full-service Automated Teller Machine (ATM). Since the previous evaluation, Killbuck has not closed any branch offices or ATMs. On August 14, 2019, Killbuck opened its 11th branch office. This office is Killbuck's second office in Wayne County and is located in Kidron, Ohio. Lending activities originating from this office were not considered in this evaluation since the branch opened outside the lending evaluation period.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	9/30/2019		12/31/2018		12/31/2017	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	19,613	5.4%	19,480	5.4%	16,874	5.1%
Secured by One- to Four- Family Dwellings	150,503	41.1%	144,878	39.8%	133,682	40.1%
Other Real Estate: Farmland	31,419	8.6%	32,900	9.0%	35,832	10.8%
Other Real Estate: Multifamily	5,398	1.5%	4,580	1.3%	4,735	1.4%
Other Real Estate: Nonfarm nonresidential	92,557	25.3%	96,447	26.5%	84,192	25.3%
Commercial and Industrial	56,271	15.4%	55,279	15.2%	48,145	14.5%
Loans to Individuals	6,757	1.8%	6,838	1.9%	6,079	1.8%
Agricultural Loans	3,386	0.9%	3,567	1.0%	3,466	1.0%
Total	\$365,904	100.00%	\$363,969	100.00%	\$333,005	100.00%



Killbuck was rated “Satisfactory” at its previous CRA performance evaluation (April 4, 2016). The lending and community development tests were each rated “Satisfactory.”

There are no known legal, financial, or other factors impeding Killbuck’s ability to help meet the credit needs in its communities.

DESCRIPTION OF ASSESSMENT AREA

Killbuck has one delineated CRA assessment area located in Non-metropolitan Ohio. Killbuck’s assessment area is comprised of the entirety of Holmes County and portions of Ashland, Coshocton, Knox, Tuscarawas, and Wayne counties. See Appendix A for an assessment area map for details.

Based on 2018 U.S. census data, the assessment area consists of 39 total census (two moderate-, 32 middle-, 4 upper-, and 1 unknown-income) tracts. In 2018 three middle-income census tracts¹ in Coshocton County were designated as distressed due to unemployment. All of Killbuck’s branch offices are located in middle-income tracts during this evaluation period. These counties are primarily rural and consist of the following income tract designations and municipalities:

County	Tract Designations	Municipalities within bank’s designated CRA footprint (total population*)
Ashland (partial)	1 middle-income tract located in the southern portion of the county	Loudonville (2,571)
Coshocton (partial)	3 middle-income tracts (distressed) in northern and western part of the county	Baltic (781)
Holmes (full)	8 middle-income tracts	Millersburg (3,189) Killbuck (817)
Knox (partial)	8 middle-income and 1 upper-income tracts in the eastern portion of the county	Danville (1,014) Howard (242) Mount Vernon (16,701)
Tuscarawas (partial)	4 middle-income tracts in the western portion of the county	Sugarcreek (2,220) New Philadelphia (17,417) Dover (12,755)
Wayne (partial)	2 moderate-income, 8 middle-income, 3 upper-income, and 1 unknown-income tracts in the southern portion of the county	Fredericksburg (423) Wooster (26,560)

Source: 2018 U.S. Census Bureau: American Community Survey (ACS) and Ohio Development Services Agency / Office of Research (County Profiles)

**Only a portion of total population resides within bank’s assessment area*

Killbuck dedicates a significant amount of time and resources providing financial literacy training to the individuals within the assessment area. During this review period, Killbuck provided over 60 hours of financial literacy training to eight schools; however, there are very few schools in the assessment area that have a majority of students eligible for free- and reduced-lunch programs. A community contact indicated financial literacy training is a need within the assessment area, while not eligible for consideration under the Community Development Test, Killbuck is being responsive to this need in its assessment area.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, as of June 30, 2018, Killbuck ranked sixth out of 27 institutions in the assessment area with 7.0% of the deposit market share. The top five banks in this assessment area are PNC Bank, National Association with 14.1%, The Huntington National Bank with 13.6%, The Park National Bank with

¹Census Tracts: 9609, 9610, 9611

12.1%, The Commercial and Savings Bank of Millersburg, Ohio with 9.2%, and JPMorgan Chase Bank, National Association with 7.9%, respectively.

Community Contacts

Two community contacts were made as part of this evaluation to provide additional information regarding the credit needs and to help give context to demographic and economic conditions of the local community. The first contact, a representative from an affordable housing agency, stated there is a lack of affordable housing in the area due to market conditions that permit landlords to receive market value for rents and the age and quality of the housing stock available for rehabilitation. Typically it is cost prohibitive to convert dilapidated housing stock into serviceable affordable housing. There is a limited number of Section 8 housing available with long waiting lists that include a large number of elderly and disabled low- and moderate-income individuals. While the economy is doing well, average salaries are not keeping pace with housing costs. The contact stated while local banks are involved in the community, there is still a need for local financial institutions to help lower-income borrowers obtain low-cost housing loans and provide financing to rehabilitate dilapidated housing stock into safe, functional housing that is affordable.

The second contact, a representative from a non-profit agency focused on coordinating community services targeted to low- and moderate-income individuals and families, stated even though the economy is good there are still people in need of emergency assistance for food and clothing, financial support, access to medical care (i.e., free immunizations including for Amish children who attend public schools and other preventive care), mental health and substance abuse counseling, and adult literacy training. Although area unemployment is low, the contact indicated there is still a need for manual-skill jobs and associated workforce development programs. There is also a need for financial literacy training in the schools to help children develop good financial habits. The contact is a retired dairy farmer and confirmed that the area has experienced a significant decline in the number of dairy farms due to low milk prices and cropland that has been converted to urban uses.

Population Characteristics

According to 2018 census data estimates, the area's total population is projected to remain relatively stable over the next 20+ years.

Area	Population Change			
	2018	2020	2030	2040
	Estimated	Projected	Projected	Projected
Ashland County	53,745	53,980	55,790	57,920
Coshocton County	36,629	36,190	34,790	33,390
Holmes County	43,892	44,620	45,700	45,280
Knox County	61,893	60,270	60,650	63,750
Tuscarawas County	92,176	92,310	91,890	92,840
Wayne County	115,967	114,390	113,400	113,240
Total(s)	406,320	403,780	401,760	402,220

Source: Ohio Development Services Agency / Office of Research (County Profiles)

According to 2015 census data, the population in the assessment area was 175,865 of which 4.6% lived in moderate-income tracts. In addition 72.9% of the population was 18 years of age or older, the legal age to enter into a contract. The population age 65 and over was greater in Tuscarawas (17.4%), Coshocton (17.3%), Ashland (16.9%), and Wayne (15.7%) counties compared to 15.1% in Ohio. The larger senior population means these counties probably have smaller working- and consumer-age populations and reduced economic activity; the population age 65 and over in Holmes County was 12.2%.

According to *Amish America*,² a large Amish community of over 30,000 residents is centered in Holmes County and extends into the assessment area's five contiguous counties. Holmes County has the largest Amish settlement in Ohio and nearly half the county's residents are Amish. Farming has been in decline due to population growth and land scarcity, as a result only a minority of Amish remain in dairy farming and crop cultivation. Consequently, small business ownership is popular among the Amish consisting of furniture and handicrafts shops, restaurants, manufacturers, and homebuilders, etc. From a banking perspective, the Amish tend to favor smaller local banks for their deposit and lending needs. Overall having a large Amish population should not significantly impact Killbuck's ability to originate loans or provide other banking products and services. However, according to bank management, while Killbuck originates loans and provides deposit and checking services to the Amish, it considers the Amish Helping Fund to be a competitor. The Securities and Exchange Commission (SEC)³ described the Amish Helping Fund as a religious-based non-profit headquartered in Millersburg, Ohio that was established in 1995 to help preserve the Amish way of life by raising funds to loan to Amish families at low-interest rates to enable them to purchase real estate and gain access to working capital. Therefore, the ability to originate small business loans may be impacted because Killbuck could have difficulty competing with the Amish communities' low cost of funds.

² Amish America: <https://amishamerica.com/ohio-amish/>

³ SEC: <https://www.sec.gov/news/press/2012/2012-138-dpa.pdf>

Income Characteristics

The 2015 median family income (\$57,570) in the assessment area was less than Ohio’s (\$62,817) and increased in 2018.

**Borrower Income Levels
Ohio State Non-Metro**

HUD Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2018	\$61,400	0 - \$30,699	\$30,700 - \$49,119	\$49,120 - \$73,679	\$73,680 - & above

Between 2016 and 2017 the poverty rates in assessment area decreased in three counties and increased in three counties. Coshocton County experienced a substantial increase and was the only county to have a poverty rate greater than rates in Ohio and the nation in 2017, while Holmes County and Knox County experienced considerable decreases in poverty rates during this time period.

County	2016 Poverty Rate	2017 Poverty Rate
Ashland County	12.2%	11.4%
Coshocton County	12.7%	15.7%
Holmes County	11.7%	9.0%
Knox County	12.7%	10.7%
Tuscarawas County	12.7%	12.8%
Wayne County	11.9%	12.9%
Ohio	14.5%	13.9%
United States	14.0%	13.4%

According to 2015 census data, 13.7% of the 60,616 households in this assessment area are below the poverty level, 2.1% are receiving public assistance, and 10.4% have rent costs greater than 30.0% of their monthly income.

Housing Characteristics

According to 2015 census data, there are 66,406 housing units and 43,251 families in the assessment area. From an income perspective, 4.8% of total housing units, 3.6% of total families, and 2.9% of total owner-occupied units are located in assessment area’s moderate-income tracts. Of the housing units located in moderate-income tracts, 39.7% are owner-occupied, 51.6% are rentals, and 8.7% are vacant. Therefore, based on the limited number of moderate-income tracts, housing units, and families; and the high percentage of rental and vacant units, there appear to be limited credit-related opportunities for Killbuck to make residential mortgage loans and provide various aspects of affordable housing in these tracts.

The 2015 census data shows the median age of housing stock was 47 years old, and 28.8% of assessment area's 66,406 housing units are at least 65 years old (built before 1950). This indicates there are opportunities to make home improvement loans. The median housing value in the assessment area was \$139,715 with an affordability ratio of 34.88. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. As indicated in the table below, median housing values increased slightly between 2015 and 2017 with the greatest increase in value occurring in Holmes County. During this same time period, housing became more affordable across the assessment area, except in Holmes County. The primary reason housing affordability increased throughout the assessment area can be attributed to the increase in median family income which rose more than housing costs between 2015 and 2017. However, a community contact indicated that average salaries are not keeping pace with area housing costs. Conversely, median gross rents increased across the assessment area and outpaced the increase median family income in Tuscarawas, Holmes, and Wayne counties, respectively. The table below presents housing characteristics from the census data between 2015 and 2017.

Housing Costs Change					
Area	Median Housing Value		Percent Change	Affordability Ratio	
	2015	2017		2015	2017
Ashland County	\$120,800	\$122,000	0.99%	39.74	41.72
Coshocton County	\$96,500	\$95,500	-1.04%	43.21	45.29
Holmes County	\$161,100	\$183,800	14.09%	32.28	31.95
Knox County	\$132,500	\$138,900	4.83%	36.63	36.87
Tuscarawas County	\$111,100	\$117,100	5.40%	40.78	42.24
Wayne County	\$135,700	\$140,100	3.24%	37.13	38.57
Ohio	\$129,900	\$193,500	48.96%	38.05	29.79

Source: 2018 U.S. Census Bureau: American Community Survey (ACS)

Rental Costs Change			
Area	Median Gross Rents		Percent Change
	2015	2017	
Ashland County	\$676	\$707	4.59%
Coshocton County	\$565	\$594	5.13%
Holmes County	\$561	\$602	7.31%
Knox County	\$699	\$712	1.86%
Tuscarawas County	\$674	\$725	7.57%
Wayne County	\$657	\$700	6.54%
Ohio	\$730	\$982	34.52%

Source: 2018 U.S. Census Bureau: American Community Survey (ACS)

Labor, Employment, and Economic Characteristics

The unemployment rates across the assessment area declined between 2016 and 2017 and 2017 and 2018. During this time period, Holmes County was the only county with unemployment rates consistently lower than the rates for Ohio and the nation.

Unemployment Rates			
Area	Years - Annualized		
	2016	2017	2018
Ashland County	5.1%	4.9%	4.6%
Coshocton County	7.1%	6.8%	6.2%
Holmes County	3.6%	3.5%	3.3%
Knox County	4.6%	4.5%	4.3%
Tuscarawas County	5.8%	5.0%	4.6%
Wayne County	4.0%	3.9%	3.9%
Ohio	5.0%	5.0%	4.6%
National	4.9%	4.4%	3.9%
<i>Not Seasonally Adjusted</i>			
<i>Data extraced on December 3, 2019</i>			

According to Dun & Bradstreet, the majority of businesses (88.6%) in the assessment area have revenues under \$1 million and approximately 189,000 paid employees working in either the private sector or government. By percentage of employees, the largest job category in the assessment area is manufacturing, followed by trade/transportation/utilities, education/health, local government, leisure/hospitality, and professional/business services, respectively. By highest paying industries it is construction, followed by manufacturing, government (federal, state, local), financial services, information, and professional/business services, respectively.⁴

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Killbuck’s performance under the lending test is considered “Satisfactory.” The loan-to-deposit ratio is reasonable. The bank made a majority of its loans inside its assessment area. The borrower distribution is reasonable to individuals of different income levels and is excellent to businesses and farms of different revenue sizes. The geographic distribution of lending is reasonable primarily because of a low level of lending gaps.

While Killbuck does not report data under the Home Mortgage Disclosure Act (HMDA) and the

⁴Ohio Development Services Agency: https://www.development.ohio.gov/reports/reports_countytrends_map.htm

Community Reinvestment Act, 2018 aggregate data⁵ was used as a proxy for loan demand in certain situations in the borrower and geographic distributions. Although Killbuck's mortgage loans are not necessarily the same as those reported under HMDA, the loans are similar in nature.

Loan-to-Deposit Ratio

This performance criterion evaluates Killbuck’s average loan-to-deposit (LTD) ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the assessment area and in comparison to similarly situated FDIC-insured institutions. The three similarly situated institutions were selected based on asset size, product offerings, market share, and the area where they are located (operating within similar assessment area). While Killbuck’s LTD is lower than the custom peer, Killbuck’s customers tend to be larger savers and do not have as great demand for loans. As a result, Killbuck’s LTD ratio is reasonable.

Killbuck Savings Bank Company Loan-to-Deposit Ratios					
As of Date	KILLBUCK SVGS BK CO	COMMERCIAL & SVG BK	FIRST FED CMNTY BK NA	WAYNE SVG CMNTY BK	CUSTOM PEER
September 30, 2019	75.80	84.85	93.21	99.19	92.42
June 30, 2019	81.03	87.13	90.00	96.46	91.20
March 31, 2019	82.59	89.01	92.96	97.30	93.09
December 31, 2018	82.35	89.42	89.91	97.07	92.13
September 30, 2018	81.04	89.86	88.51	98.63	92.33
June 30, 2018	78.77	88.75	91.68	96.01	92.15
March 31, 2018	76.45	90.80	94.47	92.24	92.50
December 31, 2017	71.92	87.54	92.84	92.33	90.90
September 30, 2017	70.66	88.12	89.20	92.35	89.89
June 30, 2017	70.87	89.81	90.49	89.00	89.77
March 31, 2017	65.98	87.45	94.49	87.78	89.91
December 31, 2016	65.15	86.79	99.10	85.92	90.60
September 30, 2016	67.35	87.54	98.10	85.09	90.24
June 30, 2016	69.45	86.11	95.50	83.45	88.35
March 31, 2016	67.58	83.80	95.94	83.41	87.72
December 31, 2015	65.12	79.54	96.39	80.43	85.45
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation	73.26	87.28	93.30	91.04	90.54

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the assessment area. A substantial majority of Killbuck’s loans, by number and dollar, are originated inside the assessment area.

⁵ 2018 Aggregate Data: <https://ffiec.cfpb.gov/data-publication/disclosure-reports>

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Motor Vehicle	224	95.7	\$2,858	94.7	10	4.3	\$159	5.3
Other - Secured	46	100.0	\$559	100.0	0	0.0	\$0	0.0
Other - Unsecured	87	98.9	\$817	99.8	1	1.1	\$2	0.2
Total Consumer related	357	97.0	\$4,233	96.3	11	3.0	\$161	3.7
Home Equity	187	94.0	\$15,143	95.6	12	6.0	\$701	4.4
Residential Loans	144	90.6	\$22,109	90.8	15	9.4	\$2,242	9.2
Total Non-HMDA	331	92.5	\$37,251	92.7	27	7.5	\$2,943	7.3
Small Business	762	94.2	\$110,317	91.7	47	5.8	\$9,959	8.3
Total Small Bus. related	762	94.2	\$110,317	91.7	47	5.8	\$9,959	8.3
Small Farm	161	97.6	\$12,389	95.5	4	2.4	\$580	4.5
Total Small Farm related	161	97.6	\$12,389	95.5	4	2.4	\$580	4.5
TOTAL LOANS	1,611	94.8	\$164,191	92.3	89	5.2	\$13,643	7.7

Note: Affiliate loans not included

Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes

This performance criterion evaluates Killbuck's lending in 2018 to borrowers of different income levels and businesses and farms of different revenue sizes. Killbuck's lending has an overall reasonable penetration among individuals of different income levels and an excellent penetration among businesses and farms of different sizes. Borrower distribution is reasonable for residential mortgage and home equity lending and excellent for small business, small farm, motor vehicle, and other secured and other unsecured lending.

Small Business Lending

Killbuck made 762 small business loans totaling \$110.3 million to businesses of different sizes, and 586 (76.9%) of these loans totaling \$51.4 million were made to businesses with revenues of \$1 million or less which was below the percentage of small businesses in the assessment area at 88.6%. The aggregate made 48.6% of loans to businesses with revenues of \$1 million or less. This indicates that Killbuck was better able to lend to small businesses compared to large banks in the area. Considering Killbuck's performance compared to proxy and additional performance context provided by the aggregate, the distribution of small business loans to businesses of different sizes is excellent.

Also, during the evaluation period Killbuck made 71.0% of its small dollar loans in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts which tends to represent amounts typically requested by small businesses. Killbuck was able to make a reasonable number of small dollar loans in smaller amounts regardless of competition from the Amish Helping Fund.

Residential Mortgage Lending

Killbuck made 144 residential mortgage loans totaling \$22.1 million including six (4.2%) loans totaling \$899,000 to borrowers with unknown-income designations. Killbuck made 11 (7.6%) residential mortgage loans totaling \$1.2 million to low-income borrowers, which was well below the percentage of families at 16.9%. The aggregate made 7.4% of HMDA loans to low-income borrowers. But considering Killbuck made a similar percentage of residential mortgage loans as the percentage of HMDA reportable loans to low-income borrowers; borrower distribution of residential mortgage loans to low-income borrowers is reasonable.

Killbuck made 47 (32.6%) residential mortgage loans totaling \$6.6 million to moderate-income borrowers, which significantly exceeded the percentage of families at 19.1%. Considering Killbuck's stronger performance compared to proxy, the distribution of residential mortgage loans to moderate-income borrowers is excellent.

Killbuck made 39 (27.1%) residential mortgage loans totaling \$5.8 million to middle-income borrowers, which exceeded proxy at 23.3%. Killbuck made 41 (28.5%) residential mortgage loans totaling \$7.6 million to upper-income borrowers, which was below the proxy at 40.7%.

While Killbuck's performance varied compared to the percentage of families, Killbuck significantly exceeded the proxy for moderate-income borrowers. Therefore, borrower distribution of residential mortgage lending is reasonable.

Home Equity Lending

Killbuck made 187 home equity lines of credit totaling \$15.1 million including five (2.7%) loans totaling \$208,000 to borrowers with unknown-income designations. Killbuck made seven (3.7%) home equity lines of credit totaling \$317,000 to low-income borrowers, which was significantly below the percentage of families at 16.9%. Compared to the proxy, borrower distribution of home equity lines of credit to low-income borrowers is very poor.

Killbuck made 46 (24.6%) home equity lines of credit totaling \$2.5 million to moderate-income borrowers, which significantly exceeded the percentage of families at 19.1%. Compared to the proxy, borrower distribution of home equity lines of credit to moderate-income borrowers is excellent.

Killbuck made 61 (32.6%) home equity lines of credit totaling \$4.5 million to middle-income borrowers, which significantly exceeded proxy at 23.3%. Killbuck made 68 (36.4%) home equity lines of credit totaling \$7.6 million to upper-income borrowers, which was below the proxy at 40.7%.

While Killbuck's performance varied compared to the percentage of families, Killbuck significantly exceeded proxy for moderate-income borrowers; therefore, borrower distribution of

home equity lending is reasonable.

Small Farm Lending

Killbuck made 161 small farm loans totaling \$12.4 million to farms of different sizes, and 156 (96.9%) of these loans totaling \$10.5 million were made to farms with revenues of \$1.0 million or less which was comparable to the percentage of small farms in the assessment area at 98.8%. Therefore, the distribution of small farm loans to farms of different sizes is excellent.

Also, during the evaluation period Killbuck made 80.1% of its small dollar loans in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts which tends to represent amounts typically requested by small farms. Killbuck was able to make a reasonable number of small dollar loans in smaller amounts regardless of the competition from the Amish Helping Fund.

Motor Vehicle Lending

Killbuck made 224 motor vehicle loans totaling \$2.9 million including 13 (5.8%) loans totaling \$158,000 to borrowers with unknown-income designations. Killbuck made 46 (20.5%) motor vehicle loans totaling \$415,000 to low-income borrowers, which was comparable to the percentage of households at 20.4%. Compared to the proxy, borrower distribution of motor vehicle loans to low-income borrowers is excellent.

Killbuck made 71 (31.7%) motor vehicle loans totaling \$765,000 to moderate-income borrowers, which significantly exceeded the percentage of households at 15.8%. Compared to the proxy, borrower distribution of motor vehicle loans to moderate-income borrowers is excellent.

Killbuck made 62 (27.7%) motor vehicle loans totaling \$781,000 to middle-income borrowers, which significantly exceeded proxy at 19.4%. Killbuck made 32 (14.3%) motor vehicle loans totaling \$739,000 to upper-income borrowers, which was well below the proxy at 44.5%.

Killbuck's performance was comparable to the proxy for low-income borrowers and substantially exceeded proxy for moderate-income borrowers; therefore, borrower distribution of motor vehicle lending is excellent.

Other Secured and Other Unsecured Lending

Killbuck made 133 other secured and other unsecured loans totaling \$1.4 million including ten (7.5%) loans totaling \$89,000 to borrowers with unknown-income designations. Killbuck made 30 (22.6%) other secured and other unsecured loans totaling \$167,000 to low-income borrowers, which exceeded the percentage of households at 20.4%. Compared to proxy borrower distribution of other secured and other unsecured loans to low-income borrowers is excellent.

Killbuck made 49 (36.8%) motor vehicle loans totaling \$565,000 to moderate-income borrowers, which significantly exceeded the percentage of households at 15.8%. Compared to the proxy, borrower distribution of other secured and other unsecured loans to moderate-income borrowers is excellent.

Killbuck made 26 (19.5%) other secured and other unsecured loans totaling \$315,000 to middle-income borrowers, which exceeded proxy at 19.4%. Killbuck made 18 (13.5%) other secured and other unsecured loans totaling \$239,000 to upper-income borrowers, which was well below the proxy at 44.5%.

Killbuck exceeded the proxy for low-income borrowers and substantially exceeded proxy for moderate-income borrowers; therefore, borrower distribution of other secured and other unsecured lending is excellent.

Geographic Distribution of Loans

This performance criterion evaluates Killbuck’s distribution of lending in 2018 within its assessment area by income level of census tracts. The bank’s distribution of loans among different geographic income levels is poor for small business, residential mortgage, home equity, motor vehicle, and other secured and other unsecured lending and excellent for small farm lending. However, Killbuck made loans in a substantial majority of census tracts in its assessment area. Therefore, the overall geographic distribution is reasonable.

Tract Income Level	Number of Tracts	Number of Tracts with Loans	% of Tracts with Loans
Moderate	2	2	100.0%
Middle	32	30	93.8%
Upper	4	4	100.0%
Unknown	1	0	0.0%
Total	39	36	92.3%

Overall, lending gaps are considered low since Killbuck was able to make one or more loans in all but two middle-income tracts and the unknown-income tract within its assessment area in 2018.

Small Business Lending

Killbuck made 762 small business loans totaling \$110.3 million. Killbuck made one (0.1%) loan totaling \$130,000 in moderate-income tracts, which was substantially below the percentage of businesses in these tracts at 4.3%. The aggregate made 4.3% of loans in moderate-income tracts. The aggregate’s performance demonstrates that opportunities are available to make small business loans in moderate-income tracts. Given that Killbuck’s performance was substantially

below proxy and the additional performance context provided by the aggregate; the geographic distribution of small business loans in moderate-income tracts is very poor.

Killbuck made 751 (98.6%) loans totaling \$109.6 million in middle-income tracts, which exceeded the percentage of businesses in these tracts at 86.8%. The aggregate made 87.3% of loans in middle-income tracts. Killbuck made ten (1.3%) loans totaling \$616,000 in upper-income tracts, which was significantly below proxy in these tracts at 8.8%. The aggregate made 7.2% of loans in upper-income tracts.

Killbuck's performance was predominantly concentrated in middle-income tracts and did not adequately reflect the dispersion of census tracts or proxies in each geography. Therefore, geographic distribution of small business lending is poor.

Residential Mortgage Lending

Killbuck made 144 residential mortgage loans totaling \$22.1 million. Killbuck made no loans in moderate-income tracts, while the percentage of owner-occupied units in these tracts is 2.9%. The aggregate made 3.6% of HMDA loans in moderate-income tracts demonstrating that there is opportunity to lend in these tracts. Given that Killbuck's performance was substantially below proxy and the percentage of HMDA reportable loans in moderate-income tracts; the geographic distribution of residential mortgage loans in moderate-income tracts is very poor.

Killbuck made 139 (96.5%) loans totaling \$21.3 million in middle-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 87.3%. The aggregate made 84.1% of HMDA loans in middle-income tracts. Killbuck made five (3.5%) loans totaling \$802,000 in upper-income tracts, which was well below proxy in these tracts at 9.7%. The aggregate made 12.1% of HMDA loans in upper-income tracts.

Killbuck's performance was predominantly concentrated in middle-income tracts and did not adequately reflect the dispersion of census tracts or proxies in each geography. Therefore, geographic distribution of residential mortgage lending is poor.

Home Equity Lending

Killbuck made 187 home equity lines of credit totaling \$15.1 million. Killbuck made one (0.5%) loan in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 2.9%. Compared to the proxy, geographic distribution of home equity lines of credit in moderate-income tracts is very poor.

Killbuck made 183 (97.9%) loans totaling \$14.9 million in middle-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 87.3%. Killbuck made three (1.6%) loans totaling \$115,000 in upper-income tracts, which was well below proxy in these tracts at 9.7%.

Killbuck's performance was predominantly concentrated in middle-income tracts and did not adequately reflect the dispersion of census tracts or proxies in each geography. Therefore, geographic distribution of home equity lending is poor.

Small Farm Lending

Killbuck made 161 small farm loans totaling \$12.4 million. Killbuck made one (0.6%) loan totaling \$100,000 in moderate-income tracts, which was comparable to the percentage of farms in these tracts at 0.6%. The aggregate made 0.6% of loans in moderate-income tracts. Given that Killbuck's performance was comparable to proxy and additional performance context provided by the aggregate; the geographic distribution of small farm loans in moderate-income tracts is excellent.

Killbuck made 159 (98.9%) loans totaling \$12.3 million in middle-income tracts, which exceeded the percentage of farms in these tracts at 92.1%. The aggregate made 91.9% of loans in middle-income tracts. Killbuck made one (0.6%) loan totaling \$21,000 in upper-income tracts, which was significantly below proxy in these tracts at 7.3%. The aggregate made 7.5% of loans in upper-income tracts.

While Killbuck's performance was predominately concentrated in middle-income tracts, Killbuck's performance was comparable to proxy and the aggregate in moderate-income tracts; therefore, geographic distribution of small farm lending is excellent.

Motor Vehicle Lending

Killbuck made 224 motor vehicle loans totaling \$2.9 million. Killbuck made four (1.8%) loans in moderate-income tracts, which was well below the percentage of households in these tracts at 4.8%. Compared to proxy geographic distribution of motor vehicle loans in moderate-income tracts is poor.

Killbuck made 220 (98.2%) loans totaling \$2.8 million in middle-income tracts, which exceeded the percentage of households in these tracts at 85.5%. Killbuck made no loans in upper-income tracts, while the proxy in these tracts is 9.6%.

Killbuck's performance was predominantly concentrated in middle-income tracts and did not adequately reflect the dispersion of census tracts or proxies in each geography. Therefore, geographic distribution of motor vehicle lending is poor.

Other Secured and Other Unsecured Lending

Killbuck made 133 other secured and other unsecured loans totaling \$1.4 million. Killbuck made no loans in moderate-income tracts, while the percentage of households in these tracts is 4.8%.

Compared to proxy geographic distribution of other secured and other unsecured loans in moderate-income tracts is very poor.

Killbuck made 130 (97.7%) loans totaling \$1.3 million in middle-income tracts, which exceeded the percentage of households in these tracts at 85.5%. Killbuck made three (2.3%) loans totaling \$43,000 in upper-income tracts, which was significantly below the proxy in these tracts at 9.6%. Killbuck's performance was predominantly concentrated in middle-income tracts and did not adequately reflect the dispersion of census tracts or proxies in each geography. Therefore, geographic distribution of other secured and other unsecured lending is poor.

Response to Complaints

No CRA related complaints were received during this evaluation period.

Community Development Test

Killbuck's performance under the community development test is considered "Outstanding." The bank's community development performance demonstrates an excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering Killbuck's capacity and the need and availability of such opportunities in the assessment area. In particular, Killbuck's variety of community development loans and donations exhibits an excellent responsiveness to the needs in the community. The community development loans and donations provide needed jobs to help to the local economy and affordable housing, and result in improved outcomes for low- and moderate-income individuals and families. Community contacts stressed the need for affordable housing, emergency and other social services targeted to lower-income individuals and families, financial literacy, and workforce development.

Community Development Lending

Killbuck originated 19 community development loans totaling approximately \$19.0 million during the evaluation period. Details are shown in the table below.

Economic Development		Affordable Housing	
#	\$	#	\$
10	\$15,484,348	9	\$3,496,500

The community development loans were made with the following purposes:

- Multiple loans supporting a small business purchase of a new building and equipment in order to expand and create 43 new permanent jobs of which 87.0% were to low- and moderate-income individuals
- Nine multi-family housing loans resulting in 125 units of affordable housing for low- and moderate-income individuals

These loans demonstrate responsiveness to needs in the community. Community contacts stressed the need for affordable housing and workforce development, which these loans support.

Qualified Investments

Killbuck originated 19 qualified community development investments totaling approximately \$36,583 during the evaluation period.

Community Services		Affordable Housing	
#	\$	#	\$
16	\$21,583	3	\$15,000

Killbuck paid \$21,583 in interest above the market rate on five different Ohio Interest On Lawyer Trust Accounts (IOLTAs) accounts. Over the evaluation period there were 16 instances in which this occurred because not all five accounts participated each year. IOLTAs have been used to fund civil legal aid for Ohioans who cannot afford an attorney. In this way, civil legal aid ensures fairness in the justice system regardless of how much money a person has.

Killbuck works with the Federal Home Loan Bank of Cincinnati to offer qualifying low- and moderate-income homebuyers Welcome Home Fund grants. During this evaluation period, Killbuck assisted three low- and moderate-income homebuyers qualify for \$5,000 of assistance to fund either down payments or closing costs for their new homes totaling \$15,000.

Finally, consideration was given to six qualified community development investments totaling approximately \$2.8 million that benefited counties within Ohio but outside Killbuck’s delineated assessment area. During the current evaluation period, Killbuck made a qualified investment totaling \$1.7 million in a mortgage-backed security supporting affordable housing in the Columbus metropolitan area. From prior periods, Killbuck holds one outstanding mortgage-backed security with a current book value totaling \$35,487 supporting affordable housing in the Cincinnati metropolitan area. The four remaining prior period investments totaling \$1.1 million are municipal school bonds that provide financing for schools that serve a majority of students eligible for free or reduced lunch programs.

Killbuck also made 47 donations totaling \$105,617 to 27 different organizations during this evaluation period as shown below:

Purpose of CD Donation	#	\$
Community Services	35	\$64,286
Economic Development	10	\$40,731
Affordable Housing	2	\$600
Total	47	\$105,617

Donations primarily support non-profits that provide a multitude of services to low- and moderate-income individuals and families, including but not limited to local food banks, affordable housing, and emergency services. In particular, the in-kind donations of office space and payment of merchant service charges on credit card transactions made at a benefit auction supporting a non-profit organization that helps pay medical bills for low- and moderate-income children demonstrate responsiveness to needs in the community. Community contacts stressed the need for medical care, affordable housing, and services targeted toward low- and moderate-income individuals and families, which these donations support.

Community Development Services

During the evaluation period, 13 employees provided assistance to 15 different local organizations that provide a multitude of services throughout the assessment area.

Community Services		Economic Development		Affordable Housing	
# Services	# Orgs	# Services	# Orgs	# Services	# Orgs
9	7	7	7	1	1

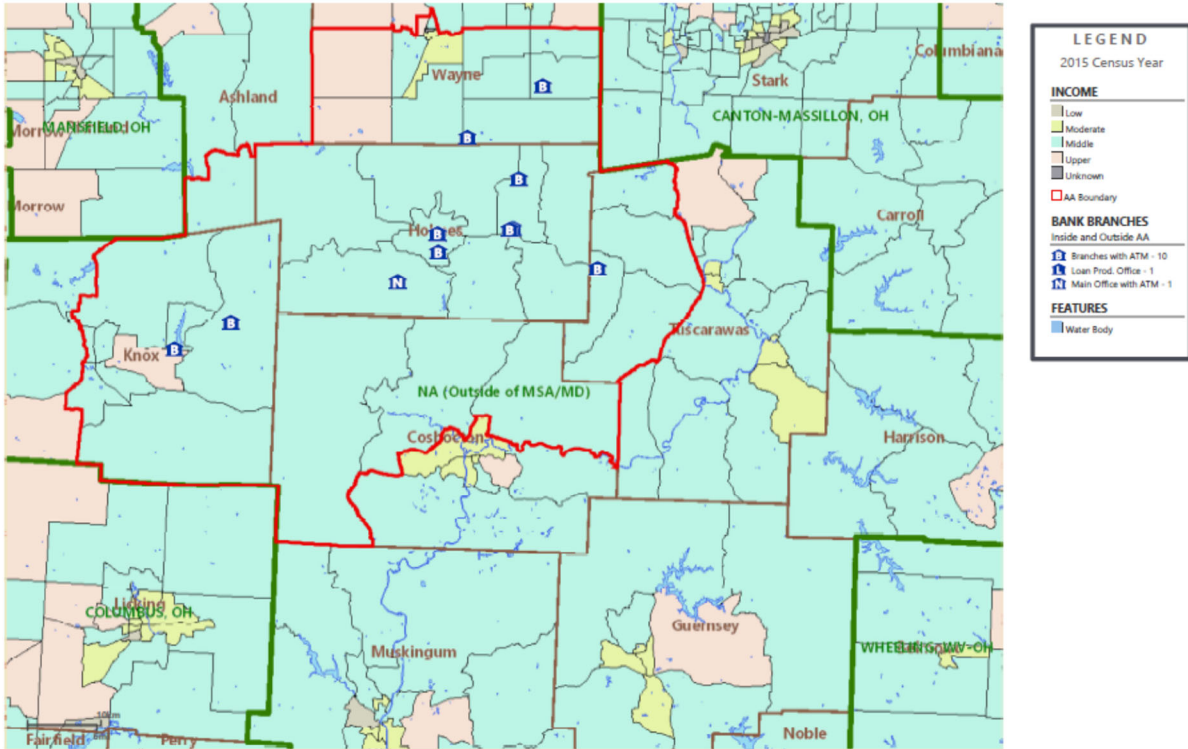
Employees provided financial expertise through leadership positions in several community organizations that provide services to low- and moderate-income individuals and families, and promote affordable housing and community and economic development. Community development services include providing technical expertise, financial literacy education, and serving on boards and committees.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

An evaluation of the bank’s fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – MAP OF THE ASSESSMENT AREA

Assessment Area: The Killbuck Savings Bank Company



APPENDIX B – DEMOGRAPHICS INFORMATION

Combined Demographics Report

Assessment Area(s): Killbuck 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0	0	0	0	0	7,325	16.9	
Moderate-income	2	5.1	1,556	3.6	367	23.6	8,240	19.1	
Middle-income	32	82.1	37,698	87.2	4,065	10.8	10,064	23.3	
Upper-income	4	10.3	3,984	9.2	282	7.1	17,622	40.7	
Unknown-income	1	2.6	13	0	0	0	0	0	
Total Assessment Area	39	100.0	43,251	100.0	4,714	10.9	43,251	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	3,182	1,263	2.9	39.7	1,643	51.6	276	8.7	
Middle-income	56,543	38,128	87.3	67.4	13,669	24.2	4,746	8.4	
Upper-income	6,591	4,251	9.7	64.5	1,594	24.2	746	11.3	
Unknown-income	90	30	0.1	33.3	38	42.2	22	24.4	
Total Assessment Area	66,406	43,672	100.0	65.8	16,944	25.5	5,790	8.7	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	320	4.3	271	4.1	43	6.1	6	4.2	
Middle-income	6,466	86.8	5,728	86.8	611	86.3	127	89.4	
Upper-income	653	8.8	593	9	51	7.2	9	6.3	
Unknown-income	7	0.1	4	0.1	3	0.4	0	0	
Total Assessment Area	7,446	100.0	6,596	100.0	708	100.0	142	100.0	
	Percentage of Total Businesses:			88.6		9.5		1.9	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	4	0.6	4	0.6	0	0	0	0	
Middle-income	608	92.1	600	92	5	100	3	100	
Upper-income	48	7.3	48	7.4	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	660	100.0	652	100.0	5	100.0	3	100.0	
	Percentage of Total Farms:			98.8		.8		.5	

2018 FFIEC Census Data and 2018 D&B Information

APPENDIX C – LOAN DISTRIBUTION TABLES

CRA Loan Distribution Table

Exam: The Killbuck Savings Bank 2019

Assessment Area/Group: Killbuck 2018

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	0.1%	130	0.1%	1	0.6%	100	0.8%	0	0.0%	0	0.0%
Low/Moderate Total	1	0.1%	130	0.1%	1	0.6%	100	0.8%	0	0.0%	0	0.0%
Middle	751	98.6%	109,572	99.9%	159	98.8%	12,268	99.0%	0	0.0%	0	0.0%
Upper	10	1.3%	616	0.6%	1	0.6%	21	0.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	762	100.0%	110,317	100.0%	161	100.0%	12,389	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	586	76.9%	51,404	46.6%	156	96.9%	10,539	85.1%	0	0.0%	0	0.0%
Over \$1 Million	176	23.1%	58,913	53.4%	5	3.1%	1,850	14.9%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	762	100.0%	110,317	100.0%	161	100.0%	12,389	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	541	71.0%	23,453	21.3%	129	80.1%	3,786	30.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	139	18.2%	24,712	22.4%	20	12.4%	3,380	27.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	71	9.3%	34,692	31.4%	10	6.2%	3,777	30.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	11	1.4%	27,460	24.9%	2	1.2%	1,447	11.7%	0	0.0%	0	0.0%
Total	762	100.0%	110,317	100.0%	161	100.0%	12,389	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	462	78.8%	18,609	36.2%	129	82.7%	3,786	35.9%	0	0.0%	0	0.0%
\$100,001 - \$250,000	87	14.8%	14,749	28.7%	19	12.2%	3,130	29.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	35	6.0%	13,487	26.2%	6	3.8%	2,177	20.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	2	0.3%	4,560	8.9%	2	1.3%	1,447	13.7%	0	0.0%	0	0.0%
Total	586	100.0%	51,404	100.0%	156	100.0%	10,539	100.0%	0	0.0%	0	0.0%

*Information based on Test data

Consumer Loan Distribution Table

Exam: Killbuck 2019

Assessment Area/Group :Killbuck 2018

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	7	3.7%	317	2.1%
Moderate	1	0.5%	100	0.7%	46	24.6%	2,445	16.1%
Low/Moderate Total	1	0.5%	100	0.7%	53	28.3%	2,762	18.2%
Middle	183	97.9%	14,928	98.6%	61	32.6%	4,542	30.0%
Upper	3	1.6%	115	0.8%	68	36.4%	7,632	50.4%
Unknown	0	0.0%	0	0.0%	5	2.7%	208	1.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	187	100.0%	15,143	100.0%	187	100.0%	15,143	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	46	20.5%	415	14.5%
Moderate	4	1.8%	82	2.9%	71	31.7%	765	26.8%
Low/Moderate Total	4	1.8%	82	2.9%	117	52.2%	1,180	41.3%
Middle	220	98.2%	2,775	97.1%	62	27.7%	781	27.3%
Upper	0	0.0%	0	0.0%	32	14.3%	739	25.8%
Unknown	0	0.0%	0	0.0%	13	5.8%	158	5.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	224	100.0%	2,858	100.0%	224	100.0%	2,858	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	14	30.4%	121	21.6%
Moderate	0	0.0%	0	0.0%	19	41.3%	270	48.3%
Low/Moderate Total	0	0.0%	0	0.0%	33	71.7%	391	69.9%
Middle	45	97.8%	546	97.7%	6	13.0%	47	8.5%
Upper	1	2.2%	13	2.3%	4	8.7%	92	16.5%
Unknown	0	0.0%	0	0.0%	3	6.5%	29	5.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	559	100.0%	46	100.0%	559	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	16	18.4%	46	5.6%
Moderate	0	0.0%	0	0.0%	30	34.5%	295	36.2%
Low/Moderate Total	0	0.0%	0	0.0%	46	52.9%	341	41.8%
Middle	85	97.7%	786	96.3%	20	23.0%	268	32.8%
Upper	2	2.3%	30	3.7%	14	16.1%	147	18.0%
Unknown	0	0.0%	0	0.0%	7	8.0%	60	7.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	87	100.0%	817	100.0%	87	100.0%	817	100.0%
	Residential Loans							
Low	0	0.0%	0	0.0%	11	7.6%	1,198	5.4%
Moderate	0	0.0%	0	0.0%	47	32.6%	6,643	30.0%
Low/Moderate Total	0	0.0%	0	0.0%	58	40.3%	7,841	35.5%
Middle	139	96.5%	21,307	96.4%	39	27.1%	5,755	26.0%
Upper	5	3.5%	802	3.6%	41	28.5%	7,614	34.4%
Unknown	0	0.0%	0	0.0%	6	4.2%	899	4.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	144	100.0%	22,109	100.0%	144	100.0%	22,109	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	94	13.7%	2,096	5.1%
Moderate	5	0.7%	182	0.4%	213	31.0%	10,418	25.1%
Low/Moderate Total	5	0.7%	182	0.4%	307	44.6%	12,515	30.2%
Middle	672	97.7%	40,342	97.2%	188	27.3%	11,393	27.5%
Upper	11	1.6%	960	2.3%	159	23.1%	16,224	39.1%
Unknown	0	0.0%	0	0.0%	34	4.9%	1,353	3.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	688	100.0%	41,485	100.0%	688	100.0%	41,485	100.0%

APPENDIX D – GLOSSARY

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

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity lines of credit, 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 nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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

applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 Reports 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.

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