



## **PUBLIC DISCLOSURE**

May 20, 2019

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

Southern Hills Community Bank  
Charter Number: 704013

45 E. Main Street  
Leesburg, OH 45135-9601

Office of the Comptroller of the Currency

4555 Lake Forest Drive, Suite 520  
Blue Ash, OH 45242

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

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## Overall CRA Rating

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

**The lending test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on a reasonable distribution of lending in low-and moderate-income (LMI) areas and to LMI borrowers. We placed more weight on the bank's Non-Metropolitan Statistical Area (Non-MSA) assessment area (AA) as the bank did not have sufficient home mortgage lending activity in the Cincinnati, OH-KY-IN MSA 17140 in 2018 to provide for a meaningful analysis and the bank was only in this AA for one year of the evaluation period.
- Additionally, the bank's performance relative to activities considered at the bank-wide level is reasonable. These include:
  - Bank-wide alternative delivery systems are available and effective in reaching LMI individuals and geographies. The bank has drive-up facilities and ATMs available for their customers. In addition, the bank offers online and mobile banking options.
  - The bank's loan-to-deposit (LTD) ratio is reasonable.
  - A substantial majority of the bank's loans are inside its AAs.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit ratio is reasonable. The bank's quarterly average LTD ratio over the 20 quarters since the prior CRA evaluation (June 2014 to March 2019) is 80.7 percent. The ratio ranged from a high of 87.9 percent at December 31, 2018, to a low of 72.9 percent at September 30, 2016. Since the prior CRA evaluation, the bank's LTD ratios trended downwards, but have been trending upwards since the low at September 30, 2016. The fluctuations in the LTD ratio were caused by changes to the balance sheet through natural growth and the acquisitions of Ripley Federal Savings Bank and The Adams County Building and Loan Company. Southern Hills Community Bank (SHCB) does not sell loans on the secondary market.

We evaluated SHCB's average LTD ratio by comparing it to local competitors, which included banks with branches within the AA that had total assets less than one billion dollars. The quarterly average LTD ratio for similarly situated financial institutions in the AA is 86.3 percent. SHCB's quarterly average LTD ratio of 80.7 percent compares reasonably with peer.

### Lending in Assessment Area

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

The bank originated and purchased 85.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The sample included all home mortgage loans originated in 2018 and a sample of 40 home mortgage loans originated in 2016 and 2017. The consumer loan sample included 80 loans originated in

2016 – 2018. No evidence of discriminatory or other illegal credit practices has been identified in the supervisory process.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
<b>Home Mortgage</b>	102	81.0	24	19.0	126	9,062	86.5	1,411	13.5	10,473
<b>Consumer</b>	75	93.7	5	6.3	80	790	91.3	75	8.7	865
<b>Total</b>	<b>177</b>	<b>85.9</b>	<b>29</b>	<b>14.1</b>	<b>206</b>	<b>9,852</b>	<b>86.9</b>	<b>1,486</b>	<b>13.1</b>	<b>11,338</b>

Source: Evaluation Period: 1/1/2016 – 12/31/2018 Internal Bank Data; 2018 HMDA data.

Due to rounding, totals may not equal 100.0 percent.

## Description of Institution

Southern Hills Community Bank (SHCB or bank) is an independent, intrastate federally chartered mutual headquartered in Leesburg, Ohio. The bank is not associated with a holding company. Merger/acquisition activity has affected the scope of the bank's operations during the evaluation period of January 1, 2016 to December 31, 2018. Since the prior CRA evaluation in 2014, the bank's total assets have grown to \$154.7 million as of December 31, 2018, primarily due to two acquisitions.

SHCB acquired Ripley Federal Saving Bank, a federally chartered mutual thrift, on October 21, 2017, adding approximately \$66 million in total assets. With this merger, the bank added one office in Ripley and one in Georgetown, Ohio. SHCB acquired The Adams County Building and Loan Company, a state chartered thrift, on April 21, 2018, adding approximately \$21 million in assets. With this merger, the bank added one office in West Union and one in Peebles, Ohio.

On January 23, 2019, the bank opened an office in Hillsboro, Ohio. As of the date of this evaluation, the main office remains located in Leesburg, Ohio. Additional offices are in Greenfield, Lynchburg, Ripley, Georgetown, West Union, Peebles, and Hillsboro, Ohio. The bank has not closed any offices since the previous CRA evaluation. Six of the eight offices are located in moderate-income census tracts, with the other two located in middle-income tracts. All offices, except the West Union Office, have drive-up facilities and an ATM. None of the bank's ATMs accepts deposits. In addition, the bank offers online banking, internet bill pay, mobile banking, and mobile deposit capture.

The bank has two AAs located in the state of Ohio during the evaluation period. The bank has one rating area, the state of Ohio. The AAs are contiguous, meet the requirements of the regulation, and do not arbitrarily exclude any LMI census tracts. Presently, the bank's AAs include geographies in Highland, Brown, Adams, Ross, Clinton, and Fayette counties. With the acquisition of Ripley Federal Savings Bank in 2017, SHCB is now located in the Cincinnati, OH-KY-IN Metropolitan Statistical Area (MSA) 17140. The bank's AA includes Brown County in the Cincinnati, OH-KY-IN MSA (Cincinnati MSA AA). With an office now located in the Cincinnati MSA, SHCB began reporting Home Mortgage Disclosure Act (HMDA) data and filed its first HMDA loan application register (LAR) in 2018. The bank's non-MSA AA includes Highland County, Adams County, census tract 9557 in Ross County, census tracts 9650 and 9651 in Clinton County, and census tract 9264 in Fayette County. See the "Description of Institution's Operations in Ohio" for more details on the bank's AAs for each year in the evaluation period.

Competition in the AAs is strong. Competition is comprised of national banks, savings associations, state banks, and branches of larger financial institutions. According to the June 30, 2018, Deposit Market Share Report from the Federal Deposit Insurance Corporation (FDIC), SHCB has a 1.7 percent deposit market share within the Non-MSA AA and is ranked twelfth out of 21 financial institutions. Financial institutions with significant deposit market share in the Non-MSA AA include National Cooperative Bank, N.A., Fifth Third Bank, and Merchants National Bank. For the Cincinnati MSA AA (Brown County), SHCB has a 10.0 percent deposit market share and is ranked fifth out of seven financial institutions. Financial institutions with significant deposit market share in the Cincinnati MSA AA include Peoples Bank, First State Bank, and Fifth Third Bank.

The bank serves its community with traditional deposit accounts and loan products. As of December 31, 2018, SHCB had total assets of \$154.7 million and tier one capital of \$24.2 million. Net loans and leases, as of the same period, totaled \$112.7 million, or 72.9 percent of total assets. As of the December 31, 2018 Call Report (Consolidated Reports of Condition and Income), the loan portfolio consisted of approximately 67.5 percent residential real estate (home mortgage), 4.0 percent consumer, 12.7 percent commercial/commercial real estate, and 15.8 percent agricultural loans.

The bank's loan originations and purchases, based on number of loans originated, during the evaluation period (2016 – 2018) are 14.9 percent home mortgage, 56.5 percent consumer, 19.8 percent commercial/commercial real estate, and 8.8 percent agricultural loans. The bank's loan originations and purchases, based on dollar amount of loans originated, during the evaluation period are 34.0 percent home mortgage, 16.5 percent consumer, 33.0 percent commercial/commercial real estate, and 16.5 percent agricultural loans. The bank's primary lending focus is home mortgage and consumer lending. SHCB does not sell home mortgage loans on the secondary market.

There are no financial, legal, or other factors that impede SHCB's ability to help meet the credit needs of its AAs. SHCB's previous CRA rating was "satisfactory" as of the CRA Performance Evaluation (PE) dated July 28, 2014.

## **Scope of the Evaluation**

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

We conducted a full-scope CRA evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. We used the small bank CRA evaluation procedures to assess the bank's performance. We analyzed lending activity in full-year increments during the evaluation period, January 1, 2016 to December 31, 2018. Consumer and home mortgage loans are the bank's primary lending products and were evaluated under the Lending Test. Home mortgage loans is a primary product offered by the bank, making up 34.0 percent of the loan originations during the evaluation period by dollar amount. Consumer lending represents a majority of the loan originations during the evaluation period by number of loans, at 56.5 percent.

The review included transaction testing 20 home mortgage loans originated in 2016 and 2017 for the bank's Non-MSA AA, which was the only AA at that time. In 2018, SHCB became a HMDA reporter following the acquisition of Ripley Federal Savings Bank in late 2017, allowing us to use all home mortgage loan activity for 2018 for the lending test for both the Non-MSA AA and the Cincinnati MSA AA. We completed transaction testing on a random sample of 20 consumer loans in 2016 and 2017 in the Non-MSA AA and 20 consumer loans in 2018 per AA.

Due to changes in demographic information during the evaluation period, we used the 2010 U.S. Census data for analysis and comparison purposes for loans originated and purchased in 2016 and the 2015 American Community Survey (ACS) U.S. Census data for loans originated/purchased in 2017 and 2018.

### **Selection of Areas for Full-Scope Review**

We completed full-scope reviews of both of the bank's AAs, the Non-MSA AA and the Cincinnati MSA AA. 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 the State of Ohio rating, as SHCB only operates in the state of Ohio.

The state rating is based on performance in all AAs. Refer to the "Scope of Evaluation in Ohio" 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:

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

### Description of Institution's Operations in Ohio

Presently, the bank has eight banking offices in the State of Ohio. Prior to the acquisition of Ripley Federal Savings Bank in late 2017, the bank had three offices located in Highland County. The Leesburg and Lynchburg offices are located in middle-income census tracts, and the Greenfield office is located in a moderate-income census tract. After the two acquisitions, the bank added the Ripley and Georgetown offices in Brown County and the West Union and Peebles offices in Adams County, which are all located in moderate-income geographies. In early 2019, the bank opened the Hillsboro office, which is located in Highland County in a moderate-income census tract.

The bank selected the AAs based on their targeted lending area and office locations. The AAs are contiguous, meet the requirements of the regulation, and do not arbitrarily exclude LMI areas. The bank's pre-acquisition AA from July 28, 2014, to October 20, 2017, included Highland County in its entirety, census tract 9557 in Ross County, census tracts 9650 and 9651 in Clinton County, census tract 9264 in Fayette County, and census tracts 9512.01 and 9512.02 in Brown County. These geographies make up the pre-acquisition Non-MSA AA.

The two census tracts in Brown County are located in the Cincinnati, OH-KY-IN MSA 17140; however, the bank did not have any offices in Brown County prior to the acquisition. Therefore, these two census tracts were included in the Non-MSA AA prior to the acquisition, as they did not extend substantially beyond the Non-MSA boundaries. We used this AA for our lending analysis of 2016 and 2017 in the evaluation period. With less than three months of deposit and lending activity from October 21, 2017 to year-end 2017, we did not include Brown County in its entirety in the analysis for year 2017.

Post-acquisition of Ripley Federal Savings Bank, the bank's AA from October 21, 2017 to April 20, 2018, included the same AA described above with the addition of Brown County in its entirety. With an office located in Brown County and the entire county selected as the AA, Brown County makes up the bank's Cincinnati MSA AA. The other counties or census tracts comprise the Non-MSA AA. Post-acquisition of The Adams County Building and Loan Company, the bank's AA from April 21, 2018 to



December 31, 2018, included the same AA described above with the addition of Adams County, in its entirety. Adams County is part of the Non-MSA AA, as Adams County is not in a MSA. We used the Cincinnati MSA AA (Brown County) and the Non-MSA AA (all other counties/census tracts listed above) for our analysis of lending performance for 2018.

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

Non-MSA AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA AA, 2010 Census (2016)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	15	0.0	26.7	73.3	0.0	0.0
Population by Geography	71,528	0.0	22.7	77.3	0.0	0.0
Housing Units by Geography	30,315	0.0	27.2	72.8	0.0	0.0
Owner-Occupied Units by Geography	20,591	0.0	21.6	78.4	0.0	0.0
Occupied Rental Units by Geography	5,995	0.0	38.7	61.3	0.0	0.0
Vacant Units by Geography	3,729	0.0	39.2	60.8	0.0	0.0
Businesses by Geography	2,867	0.0	31.5	68.5	0.0	0.0
Farms by Geography	472	0.0	7.6	92.4	0.0	0.0
Family Distribution by Income Level	19,359	21.5	19.0	24.7	34.8	0.0
Household Distribution by Income Level	26,586	23.8	16.7	19.6	39.9	0.0
Median Family Income Non-MSAs - OH		\$52,573	Median Housing Value			\$112,258
Median Family Income MSA – 17140 Cincinnati, OH-KY-IN MSA		\$67,016	Median Gross Rent			\$623
			Families Below Poverty Level			11.0%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA AA, 2015 ACS Census (2017)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	15	0.0	46.7	53.3	0.0	0.0
Population by Geography	70,584	0.0	44.5	55.5	0.0	0.0
Housing Units by Geography	30,398	0.0	44.6	55.4	0.0	0.0
Owner-Occupied Units by Geography	19,666	0.0	42.6	57.4	0.0	0.0
Occupied Rental Units by Geography	6,866	0.0	52.1	47.9	0.0	0.0

Vacant Units by Geography	3,866	0.0	41.2	58.8	0.0	0.0
Businesses by Geography	2,839	0.0	52.3	47.7	0.0	0.0
Farms by Geography	485	0.0	28.0	72.0	0.0	0.0
Family Distribution by Income Level	18,920	24.8	22.1	20.6	32.5	0.0
Household Distribution by Income Level	26,532	24.5	18.4	20.0	37.0	0.0
Median Family Income Non-MSAs - OH	\$56,217	Median Housing Value				\$107,547
Median Family Income MSA – 17140 Cincinnati, OH-KY-IN MSA	\$70,589	Median Gross Rent				\$678
		Families Below Poverty Level				13.3%

Source: 2015 ACS Census and 2017 D&B Data.

Due to rounding, totals may not equal 100.0.

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

## Table A – Demographic Information of the Assessment Area

### Assessment Area: Non-MSA AA, 2015 ACS Census (2018)

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	0.0	47.4	52.6	0.0	0.0
Population by Geography	89,638	0.0	42.9	57.1	0.0	0.0
Housing Units by Geography	39,387	0.0	44.4	55.6	0.0	0.0
Owner-Occupied Units by Geography	24,419	0.0	41.0	59.0	0.0	0.0
Occupied Rental Units by Geography	9,660	0.0	54.8	45.2	0.0	0.0
Vacant Units by Geography	5,308	0.0	41.4	58.6	0.0	0.0
Businesses by Geography	3,747	0.0	50.6	49.4	0.0	0.0
Farms by Geography	545	0.0	26.6	73.4	0.0	0.0
Family Distribution by Income Level	23,844	26.9	20.9	19.4	32.7	0.0
Household Distribution by Income Level	34,079	28.1	17.3	18.7	35.9	0.0
Median Family Income Non-MSAs - OH	\$56,217	Median Housing Value				\$101,373
		Median Gross Rent				\$632
		Families Below Poverty Level				15.6%

Source: 2015 ACS Census and 2018 D&B Data.

Due to rounding, totals may not equal 100.0.

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

Economic conditions in the Non-MSA AA are overall stable. As of April 2019, the “not seasonally adjusted” unemployment rates for Highland, Fayette, Ross, and Adams Counties are 3.8, 2.8, 3.3, and 5.3 percent, respectively. Except for Adams County, these are commensurate with the national and State of Ohio’s unemployment rate of 3.3 percent. Adams County was included in the bank’s Non-MSA AA in 2018 following the acquisition of The Adams County Building and Loan Company. The source of the unemployment data was from the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information, as of April 2019.

The AA has a diverse mix of companies across many industries, including manufacturing, retail, and agriculture. Large employers in Highland County include the local school systems, county government

offices, Greenfield Research, Wal-Mart Stores, Inc., and the Highland District Hospital. Large employers in Fayette County include the local school systems, Fayette County Memorial Hospital, Sugar Creek Packing Co., YUSA Corp., and Wal-Mart Stores, Inc. Large employers in Ross County include Adena Regional Health System, Wal-Mart Stores, Inc., the local school systems, and government offices. Large employers in Adams County include the local school systems, county government offices, and Adams County Regional Medical Center. Large employers in Clinton County include Ahresty Wilmington Corp. and R & L Carriers.

According to the 2010 U.S. Census data, the median housing value in the Non-MSA AA for 2016 was \$112,258. Based on the 2016 updated Non-MSA median family income in the State of Ohio of \$55,400, low-income families make less than \$27,700 and moderate-income families make less than \$44,320. Overall median housing values are approximately 2.5 to 4.1 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 30,315 total housing units in the AA, of which 67.9 percent are owner-occupied and 19.8 percent are rental occupied units. Approximately 11.0 percent of the families are below the poverty level.

According to the 2015 ACS U.S. Census data, the median housing value in the Non-MSA AA for 2017 was \$107,547. Based on the 2017 updated Non-MSA median family income in the State of Ohio of \$57,600, low-income families make less than \$28,800 and moderate-income families make less than \$46,080. Overall median housing values are approximately 2.3 to 3.7 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 30,398 total housing units in the AA, of which 64.7 percent are owner-occupied and 22.6 percent are rental occupied units. Approximately 13.3 percent of the families are below the poverty level.

According to the 2015 ACS U.S. Census data, the median housing value in the Non-MSA AA for 2018 was \$101,373. Based on the 2018 updated Non-MSA median family income in the State of Ohio of \$61,400, low-income families make less than \$30,700 and moderate-income families make less than \$49,120. Overall median housing values are approximately 2.1 to 3.3 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 39,387 total housing units in the AA, of which 62.0 percent are owner-occupied and 24.5 percent are rental occupied units. Approximately 15.6 percent of the families are below the poverty level.

As part of this CRA evaluation, we conducted one interview with a representative from a local community development organization that provides affordable housing and services to LMI individuals in Highland County in the Non-MSA AA. The contact did not specifically state any general banking/credit needs, but stated that poverty is an issue for their clients. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Cincinnati MSA AA

**Table A – Demographic Information of the Assessment Area**

Assessment Area: Cincinnati MSA AA, 2015 ACS Census (2018)

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
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Geographies (Census Tracts)	9	0.0	77.8	22.2	0.0	0.0
Population by Geography	44,247	0.0	74.7	25.3	0.0	0.0
Housing Units by Geography	19,349	0.0	73.8	26.2	0.0	0.0
Owner-Occupied Units by Geography	12,614	0.0	70.1	29.9	0.0	0.0
Occupied Rental Units by Geography	4,058	0.0	86.2	13.8	0.0	0.0
Vacant Units by Geography	2,677	0.0	72.7	27.3	0.0	0.0
Businesses by Geography	1,811	0.0	80.0	20.0	0.0	0.0
Farms by Geography	215	0.0	65.1	34.9	0.0	0.0
Family Distribution by Income Level	12,053	29.3	25.0	22.5	23.2	0.0
Household Distribution by Income Level	16,672	27.2	21.6	20.9	30.3	0.0
Median Family Income MSA – Cincinnati, OH-KY-IN 17140		\$70,589	Median Housing Value			\$113,509
			Median Gross Rent			\$640
			Families Below Poverty Level			12.0%

Source: 2015 ACS Census and 2018 D&B Data.  
Due to rounding, totals may not equal 100.0.  
(\* ) The NA category consists of geographies that have not been assigned an income classification.

Economic conditions in the Cincinnati MSA AA are overall stable. The unemployment rate in Brown County in the Cincinnati MSA AA was 3.7 percent, which compares reasonably with the state and national rate of 3.3 percent as of April 2019. The AA has a diverse mix of companies across many industries, including manufacturing, government, and agriculture. Large employers in Brown County in the Cincinnati MSA AA include Milacron, Southern State Community College, county government offices, and the local school systems.

According to the 2015 ACS U.S. Census data, the median housing value in the Cincinnati MSA AA for 2018 was \$113,509. Based on the 2018 updated Cincinnati MSA median family income of \$77,000, low-income families make less than \$38,500 and moderate-income families make less than \$61,600. Overall median housing values are approximately 1.8 to 2.9 times the annual income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 19,349 total housing units in the AA, of which 65.2 percent are owner-occupied and 21.0 percent are rental occupied units. Approximately 12.0 percent of the families are below the poverty level.

In addition, we conducted one interview with a representative from a local affordable housing organization that provides services to LMI individuals in Brown and Adams County. Affordable housing is a credit need in the community. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

## Scope of Evaluation in Ohio

We conducted a full-scope CRA evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. We analyzed lending activity in full-year increments during the evaluation period, January 1, 2016 to December 31, 2018. Consumer and home mortgage loans are the bank's primary lending products and were evaluated under the Lending Test. We completed full-scope

reviews for both AAs. For years 2016 and 2017, the bank had one AA, the Non-MSA AA. The Non-MSA AA included Highland County and specific census tracts in Ross, Clinton, Fayette, and Brown County. These census tracts were combined, analyzed, and presented as one AA for the purposes of this evaluation for 2016 and 2017. The bank has two AAs as of 2018. For 2018, the Non-MSA AA includes Highland and Adams Counties and specific census tracts in Ross, Clinton, and Fayette County. These census tracts were combined, analyzed, and presented as one AA (Non-MSA AA) for the purposes of this evaluation. For 2018, the Cincinnati MSA AA includes Brown County. The census tracts in Brown County were combined, analyzed, and presented as one AA (Cincinnati MSA AA) for the purposes of this evaluation.

We placed more weight on the Non-MSA AA because home mortgage lending volume in the Cincinnati MSA AA was low, with less than 20 loans originated in 2018 in the Cincinnati MSA AA. In addition, the bank has only been in the Cincinnati MSA AA for one year in the evaluation period (2018). According to the June 30, 2018, Deposit Market Share Report from the FDIC, total deposits in the Non-MSA AA was \$80.7 million, representing 61.2 percent of total deposits. For the same period, total deposits in the Cincinnati MSA AA were \$51.1 million, representing 38.8 percent of total deposits.

## **LENDING TEST**

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

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

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

The bank exhibits reasonable geographic distribution of loans in the state of Ohio. There are no low-income census tracts in the bank's AAs. In 2016, as of the 2010 U.S. Census data, the bank has four moderate-income census tracts in the AA. This represents 26.7 percent of the census tracts in the AA. In 2017, as of the 2015 ACS U.S. Census data, the bank has seven moderate-income census tracts in the AA. This represents 46.7 percent of the census tracts in the AA. The entire AA is moderate- and middle-income census tracts.

In 2018, the acquisition of Ripley Federal Savings Bank changed the bank's AA. The new AA consists of the Non-MSA AA and the Cincinnati MSA AA. In 2018, as of the 2015 ACS U.S. Census data, the bank has nine moderate-income census tracts in the Non-MSA AA, which represents 47.4 percent of the census tracts in the Non-MSA AA. In 2018, as of the 2015 ACS U.S. Census data, the bank has seven moderate-income census tracts in the Cincinnati MSA AA, which represents 77.9 percent of the census tracts in this AA. Both AAs include only moderate- and middle-income census tracts.

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

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

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

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

The bank's lending in 2016 in the Non-MSA AA reflects reasonable distribution. Our sample size of 20 loans captures only 10.0 percent (two loans) of the lending in moderate-income census tracts, which is below aggregate and demographic data. However, the other 18 loans in our sample were originated in middle-income geographies with 13 of the 18 in non-metropolitan distressed middle-income census tracts in Highland County. This is a significant amount of lending in distressed non-metropolitan middle-income geographies. The small sample may not have included a representative sample of loans in the moderate-income census tracts.

The bank's lending in 2017 in the Non-MSA AA reflects poor distribution, as our sample size of 20 loans captures only 25.0 percent of the lending in moderate-income census tracts, which is below aggregate and demographic data. However, the small sample of 20 loans may not have included a representative sample of loans in the moderate-income census tracts. Also the age of housing stock in the Non-MSA AA (weighted average of median year built was 1979) of approximately 40 years may be indicative of a smaller supply of lendable property than in areas with newer housing stock.

In 2018, SHCB became a HMDA reporter, allowing us to use HMDA data for our 2018 lending test. In the Non MSA AA, the bank's lending in 2018 reflects reasonable distribution, as 37.3 percent of lending is in moderate-income census tracts, which is comparable to aggregate and demographic data. In the Cincinnati MSA AA, the bank's lending in 2018 reflected reasonable distribution, with 61.5 percent lending in moderate-income census tracts. This is below aggregate data. However, this analysis is based on only 13 loans and does not provide a meaningful analysis.

### ***Consumer Loans***

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

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

The bank's lending in 2016 in the Non-MSA AA reflects excellent distribution, as our sample size of 20 loans captures 30.0 percent lending in moderate-income census tracts, which is well above the demographic data of 25.5 percent.

The bank's lending in 2017 in the Non-MSA AA reflects reasonable distribution, as our sample size of 20 loans captures 40.0 percent lending in moderate-income census tracts, which is comparable to the demographic data of 45.1 percent.

The bank's lending in 2018 in the Cincinnati MSA AA reflects reasonable distribution, as our sample size of 20 loans captures 70.0 percent lending in moderate-income census tracts. This is comparable to demographic data of 74.0 percent. In the Non-MSA AA, the bank's lending in 2018 reflects poor distribution, as our sample size of 20 loans captures only 15.0 percent of the lending in moderate-income census tracts. This is below the demographic data of 44.9 percent. However, the small sample may not have included a representative sample of loans in the moderate-income geographies.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

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

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

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

The bank's home mortgage lending to LMI borrowers in 2016 in the Non-MSA AA is excellent. SHCB's lending to low-income borrowers is reasonable, as lending exceeds aggregate data but is less than demographic data. SHCB's lending to moderate-income borrowers is excellent, as it is well above both aggregate and demographic data.

The bank's home mortgage lending to LMI borrowers in 2017 in the Non-MSA AA is reasonable. SHCB's lending to low-income borrowers is excellent, as lending is well above aggregate data. SHCB's lending to moderate-income borrowers is reasonable, as it is commensurate with aggregate and demographic data.

The bank's home mortgage lending to LMI borrowers in 2018 in the Cincinnati MSA AA does not provide for a meaningful analysis, as the bank originated only 13 loans in this AA. The bank's home mortgage lending to LMI borrowers in 2018 in the Non-MSA AA is reasonable. SHCB's lending to low-income borrowers is below aggregate and demographic data. However, lending to moderate-income borrowers is excellent, as the bank's lending exceeds both aggregate and demographic data.

We note that the rate for families below the poverty level in the Non-MSA AA in 2018 is 15.6 percent, which may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards. We also consider the median price of housing in the AA relative to the maximum income of borrowers in the low-income category, which may demonstrate a barrier to homeownership. Refer to "Description of Institution's Operations in Ohio" for more details on median price of housing.

### ***Consumer Loans***

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

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

The bank's consumer lending to LMI borrowers in 2016 in the Non-MSA AA is reasonable. SHCB's lending to low-income borrowers is below demographic data. However, the sample of 20 loans may not have included a representative sample of loans to low-income borrowers. SHCB's lending to moderate-income borrowers is excellent as it is well above demographic data.

The bank's consumer lending to LMI borrowers in 2017 in the Non-MSA AA is excellent, as it exceeds demographic data.

The bank's consumer lending to LMI borrowers in 2018 in the Cincinnati MSA AA is reasonable. SHCB's lending to low-income borrowers is reasonable, as lending is slightly below demographic data. SHCB's lending to moderate-income borrowers is excellent, as it is well above demographic data. The bank's consumer lending to LMI borrowers in 2018 in the Non-MSA AA is reasonable. SHCB's lending to low-income borrowers is well below demographic data. However, SHCB's lending to moderate-income borrowers is excellent as it is well above demographic data.

### **Responses to Complaints**

SHCB did not receive any complaints about its performance in helping to meet AA credit needs during the evaluation period.



## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/2016 – 12/31/2017	
<b>Bank Products Reviewed:</b>	Home mortgage and consumer loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
State of Ohio Non-MSA	Full-scope	This AA contained the following census tracts:  Highland County (all) – 9544.00, 9545.00, 9546.00, 9547.00, 9548.00, 9549.00, 9550.00, 9551.00, 9552.00 Ross County – 9557.00 Brown County – 9512.01, 9512.02 Clinton County – 9650.00, 9651.00 Fayette County – 9264.00

<b>Time Period Reviewed:</b>	01/01/2018 – 12/31/2018	
<b>Bank Products Reviewed:</b>	Home mortgage and consumer loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
State of Ohio Cincinnati, OH-KY-IN MSA 17140	Full-scope	This AA contained the following census tracts:  Brown County (all) – 9512.01, 9512.02, 9513.00, 9514.00, 9515.00, 9516.00, 9517.00, 9518.00, 9519.00
State of Ohio Non-MSA	Full-scope	This AA contained the following census tracts:  Highland County (all) – 9544.00, 9545.00, 9546.00, 9547.00, 9548.00, 9549.00, 9550.00, 9551.00, 9552.00 Ross County – 9557.00 Clinton County – 9650.00, 9651.00 Fayette County – 9264.00 Adams County (all) – 7701.00, 7702.00, 7703.00, 7704.00, 7705.00, 7706.00

## Appendix B: Summary of Ratings

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<b>Southern Hills Community Bank Ratings</b>	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
Southern Hills Community Bank (SHCB)	Satisfactory
<b>State:</b>	
State of Ohio	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.



**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Non-MSA AA	20	1,787	100.0	1,709	0.0	0.0	0.0	21.6	10.0	17.9	78.4	90.0	82.1	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>1,787</b>	<b>100.0</b>	<b>1,709</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>21.6</b>	<b>10.0</b>	<b>17.9</b>	<b>78.4</b>	<b>90.0</b>	<b>82.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0.  
 Bank data is based on a sample of 20 loans.

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Non-MSA AA	20	1,342	100.0	1,519	0.0	0.0	0.0	42.6	25.0	42.5	57.4	75.0	57.5	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>1,342</b>	<b>100.0</b>	<b>1,519</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>42.6</b>	<b>25.0</b>	<b>42.5</b>	<b>57.4</b>	<b>75.0</b>	<b>57.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0.  
 Bank data is based on a sample of 20 loans.

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cincinnati MSA AA	13	1,945	100.0	1,033	0.0	0.0	0.0	70.1	61.5	73.2	29.9	38.5	26.8	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>13</b>	<b>1,945</b>	<b>100.0</b>	<b>1,033</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>70.1</b>	<b>61.5</b>	<b>73.2</b>	<b>29.9</b>	<b>38.5</b>	<b>26.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Non-MSA AA	51	4,271	100.0	1,741	0.0	0.0	0.0	41.0	37.3	37.7	59.0	62.7	62.3	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>51</b>	<b>4,271</b>	<b>100.0</b>	<b>1,741</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>41.0</b>	<b>37.3</b>	<b>37.7</b>	<b>59.0</b>	<b>62.7</b>	<b>62.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2016</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$(000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Non-MSA AA	20	1,787	100.0	1,709	21.5	10.0	8.5	19.0	30.0	21.9	24.7	35.0	21.5	34.8	25.0	29.3	0.0	0.0	18.8
<b>Total</b>	<b>20</b>	<b>1,787</b>	<b>100.0</b>	<b>1,709</b>	<b>21.5</b>	<b>10.0</b>	<b>8.5</b>	<b>19.0</b>	<b>30.0</b>	<b>21.9</b>	<b>24.7</b>	<b>35.0</b>	<b>21.5</b>	<b>34.8</b>	<b>25.0</b>	<b>29.3</b>	<b>0.0</b>	<b>0.0</b>	<b>18.8</b>

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0.  
 Bank data based on a sample of 20 loans.

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$(000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Non-MSA AA	20	1,342	100.0	1,519	24.8	15.0	9.6	22.1	20.0	23.2	20.6	35.0	23.2	32.5	30.0	29.7	0.0	0.0	14.2
<b>Total</b>	<b>20</b>	<b>1,342</b>	<b>100.0</b>	<b>1,519</b>	<b>24.8</b>	<b>15.0</b>	<b>9.6</b>	<b>22.1</b>	<b>20.0</b>	<b>23.2</b>	<b>20.6</b>	<b>35.0</b>	<b>23.2</b>	<b>32.5</b>	<b>30.0</b>	<b>29.7</b>	<b>0.0</b>	<b>0.0</b>	<b>14.2</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0.  
 Bank data based on a sample of 20 loans.

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2018</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$(000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Cincinnati MSA AA	13	1,945	100.0	1,033	29.3	15.4	16.9	25.0	30.8	26.7	22.5	15.4	22.6	23.2	30.8	19.7	0.0	7.7	14.1	
<b>Total</b>	<b>13</b>	<b>1,945</b>	<b>100.0</b>	<b>1,033</b>	<b>29.3</b>	<b>15.4</b>	<b>16.9</b>	<b>25.0</b>	<b>30.8</b>	<b>26.7</b>	<b>22.5</b>	<b>15.4</b>	<b>22.6</b>	<b>23.2</b>	<b>30.8</b>	<b>19.7</b>	<b>0.0</b>	<b>7.7</b>	<b>14.1</b>	

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2018</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$(000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Non-MSA AA	51	4,271	100.0	1,741	26.9	3.9	9.3	20.9	25.5	23.7	19.4	31.4	25.1	32.7	33.3	29.4	0.0	5.9	12.5	
<b>Total</b>	<b>51</b>	<b>4,271</b>	<b>100.0</b>	<b>1,741</b>	<b>26.9</b>	<b>3.9</b>	<b>9.3</b>	<b>20.9</b>	<b>25.5</b>	<b>23.7</b>	<b>19.4</b>	<b>31.4</b>	<b>25.1</b>	<b>32.7</b>	<b>33.3</b>	<b>29.4</b>	<b>0.0</b>	<b>5.9</b>	<b>12.5</b>	

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

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2016</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$(000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA AA	20	263	100	0.0	0.0	25.5	30.0	74.5	70.0	0.0	0.0	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data.                      Due to rounding, totals may not equal 100.0                      Bank data based on a sample of 20 loans.</i>														

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2017</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$(000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA AA	20	251	100	0.0	0.0	45.1	40.0	54.9	60.0	0.0	0.0	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data.                      Due to rounding, totals may not equal 100.0                      Bank data based on a sample of 20 loans.</i>														

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2018</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$(000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cincinnati MSA AA	20	198	100.0	0.0	0.0	74.0	70.0	26.0	30.0	0.0	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0.  
Bank data based on a sample of 20 loans.*

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2018</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$(000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA AA	20	198	100.0	0.0	0.0	44.9	15.0	55.1	85.0	0.0	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0.  
Bank data based on a sample of 20 loans.*

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2016</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$(000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA AA	20	263	100.0	23.8	15.0	16.7	40.0	19.6	20.0	39.9	20.0	0.0	5.0	
<b>Total</b>	<b>20</b>	<b>263</b>	<b>100.0</b>	<b>23.8</b>	<b>15.0</b>	<b>16.7</b>	<b>40.0</b>	<b>19.6</b>	<b>20.0</b>	<b>39.9</b>	<b>20.0</b>	<b>0.0</b>	<b>5.0</b>	

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data.  
Due to rounding, totals may not equal 100.0.  
Bank data is based on a sample of 20 loans.*

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2017</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$(000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA AA	20	251	100.0	24.5	25.0	18.4	30.0	20.0	25.0	37.0	20.0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>251</b>	<b>100.0</b>	<b>24.5</b>	<b>25.0</b>	<b>18.4</b>	<b>30.0</b>	<b>20.0</b>	<b>25.0</b>	<b>37.0</b>	<b>20.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data.  
Due to rounding, totals may not equal 100.0.  
Bank data is based on a sample of 20 loans.*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2018	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$(000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cincinnati MSA AA	20	198	100.0	27.2	25.0	21.6	25.0	20.9	0.0	30.3	10.0	0.0	40.0	
<b>Total</b>	<b>20</b>	<b>198</b>	<b>100.0</b>	<b>27.2</b>	<b>25.0</b>	<b>21.6</b>	<b>25.0</b>	<b>20.9</b>	<b>0.0</b>	<b>30.3</b>	<b>10.0</b>	<b>0.0</b>	<b>40.0</b>	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data.  
 Due to rounding, totals may not equal 100.0.  
 Bank data is based on a sample of 20 loans.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2018	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$(000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA AA	20	198	100.0	28.1	10.0	17.3	35.0	18.7	25.0	35.9	25.0	0.0	5.0	
<b>Total</b>	<b>20</b>	<b>198</b>	<b>100.0</b>	<b>28.1</b>	<b>10.0</b>	<b>17.3</b>	<b>35.0</b>	<b>18.7</b>	<b>25.0</b>	<b>35.9</b>	<b>25.0</b>	<b>0.0</b>	<b>5.0</b>	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data.  
 Due to rounding, totals may not equal 100.0.  
 Bank data is based on a sample of 20 loans.