# **PUBLIC DISCLOSURE**

January 8, 2024

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community Savings Charter Number 700646

425 Main St. Caldwell, OH 43724-1323

Office of the Comptroller of the Currency

200 Public Square, Suite 1610 Cleveland, OH 44114

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:

- Community Savings' (the bank) loan to-deposit (LTD) ratio is reasonable.
- A majority of the bank's loans are inside its assessment area (AA).
- The Lending Test rating is based on the reasonable distribution of home mortgage loans among borrowers of different incomes and excellent geographic distribution of home mortgage loans.
- The bank did not receive any CRA-related complaints during the evaluation period.

#### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. Community Savings' quarterly average LTD ratio from the first quarter of 2019 through the fourth quarter of 2022 was 74.5 percent. The quarterly average LTD ratio for two similarly situated banks was 77.9 percent ranging from a low of 75.0 percent to a high of 80.9 percent. The peer analysis was based on two financial institutions with branch offices located in Noble County, Ohio (OH).

#### **Lending in Assessment Area**

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

The bank originated 79.4 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Out	Lending Inside and Outside of the Assessment Area														
	N	lumber o	of Loans			Dollar A									
Loan Category	Insid	le	Outsio	de	Total	Insid	e	Outsio	Total						
	#	%	#	%	#	\$	%	\$	%	\$(000s)					
Home Mortgage	50	79.4	13	20.6	63	4,567	78.4	1,258	21.6	5,825					
Total	50	79.4	13	20.6	63	4,567	78.4	1,258	21.6	5,825					

## **Description of Institution**

The bank is a single-state institution headquartered in Caldwell, OH and founded in 1885. On December 23, 2021, Double Bottom Line Corp. (DBC) acquired Community Savings. DBC is a one-bank holding company with total assets of \$115.6 million as of December 31, 2022. The holding company operates from the bank's main office.

As of December 31, 2022, Community Savings reported total assets of \$116.2 million, total net loans of \$46.1 million, total deposits of \$95.0 million, and Tier One capital of \$17.2 million. Net loans and leases represent 33.4 percent of total assets. During the same period, residential real estate loans represented 76.9 percent, consumer loans represented 19.4 percent, and commercial real estate represented 3.9 percent of net loans.

The bank offers traditional banking services to consumers and businesses. Community Savings' business strategy is primarily banking relationships through home mortgage lending. Lending products include residential real estate loans, home equity lines of credit (HELOC), automobile loans, and credit cards. Community Savings discontinued indirect auto loans in May 2022. Since the bank's acquisition, Community Savings has also begun to offer wholesale lending to mortgage professionals through a non-qualified mortgage (non-QM) lending program. Deposit products include checking accounts, savings accounts, money market deposit accounts, certificates of deposit accounts, and individual retirement accounts (IRA). Other services provided include online banking through the bank's website, mobile application, and digital wallet payments.

Community Savings' AA is comprised of Noble County, OH and management operates one full-service branch in Caldwell, OH. The branch offers an automated teller machine (ATM) and drive thru services with reasonable hours of operation. Community Savings allows its customers to access the MoneyPass ATM network owned by Fiserv Solutions. This arrangement gives its customers access to a network of ATMs across the United States. However, the ATMs do not have deposit-taking capabilities.

Community Savings did not face any legal, financial, or other factors impeding the ability to help meet the credit needs in its AA during the evaluation period. The bank received an overall rating of "Satisfactory" during its previous CRA performance evaluation dated January 6, 2020.

# **Scope of the Evaluation**

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

The performance evaluation assesses Community Savings' CRA performance within its AA using the OCC's CRA Small Bank evaluation procedures. The evaluation period for the Lending Test is from January 1, 2020, through December 31, 2022. Examiners selected a sample of 50 home mortgage loans in the AA to determine the distribution of loans by borrower income and geography. The evaluation included a review of demographic and economic data about Community Savings' AA and information about local economic conditions, financial condition, capacity, and ability to lend in its community. The evaluation also included gathering information from other institutions within the AA and conducting an interview with a community contact in the AA.

The OCC conducted two different analyses due to changes in census data during the evaluation period. Performance during 2020 and 2021 is compared to data from the 2015 American Community Survey

(ACS) while performance during 2022 is compared to data from the 2020 U.S. census. The OCC placed more weight on 2020-2021 performance than 2022 performance when drawing conclusions since there were only three underserved middle-income CTs in the AA in 2022, resulting in lack of meaningful analysis. The analysis is based on loan samples for each evaluation period.

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

Noble County, OH AA was selected for a full-scope review. Refer to the "Scope" section under the State Rating for details regarding how the full-scope AA was selected. Refer to appendix A, Scope of Examination, for more information.

#### **Ratings**

The bank's overall rating is based on the lending performance in the state of Ohio. Refer to the "Scope" section under State and Rating section for details regarding how the area was weighted in arriving at the respective ratings.

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

Pursuant to 12 CFR 25.28(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 Consumer Financial Protection Bureau, 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**<sup>1</sup>: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibits an excellent geographic distribution of loans.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels given the product lines offered by the bank.
- The bank did not receive any CRA-related complaints during the evaluation period.

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

Noble County is in the Appalachian Southeastern Ohio region, which is mostly rural and sparsely populated. High unemployment has remained a persistent problem due to limited job opportunities in the AA. As of December 31, 2022, the unemployment rate was 6.0 percent, which was significantly higher than the state rate of 4.1 percent and the national average of 3.5 percent. According to the Ohio Department of Job & Family Services, the AA had the second highest unemployment rate in Ohio as of December 31, 2022.

There were census tract (CT) classification changes during the evaluation period between the 2015 ACS and the 2020 U.S. Census. As of the 2015 ACS data, the AA included one moderate-income CT and two underserved middle-income CTs. There were no low- or upper-income CTs. As of the 2020 U.S. Census data, the number of CTs in the AA expanded from three to four CTs. Three CTs were classified as underserved middle-income tracts and one CT that was not assigned an income classification. There were no low-, moderate-, or upper-income CTs. The bank's branch location was in an underserved middle-income CT during both census periods.

Additionally, there were changes in the demographic data during the evaluation period between the 2015 ACS and the 2020 U.S. Census. As of the 2015 ACS data, the population of the AA was 14,508 with 23.4 percent of the population living in the one moderate-income CT and 76.6 percent living in the underserved middle-income CTs. The number of owner-occupied housing units is 4,074 with 26.1 percent in the one moderate-income CT and 73.9 in underserved middle-income CTs. The number of

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<sup>&</sup>lt;sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

families was 3,362 with 20.5 percent of families classified as low-income, 22.1 percent as moderate-income, 25.5 percent as middle-income, and 31.9 percent as upper-income families.

As of the 2020 U.S. Census data, the population of the AA was 14,115 with 78.8 percent of the population living in underserved middle-income CTs and 21.2 percent in one CT that has not been assigned an income classification. The number of owner-occupied housing units is 4,052 with 97.8 percent in underserved middle-income CTs and 2.2 percent in one CT that has not been assigned an income classification. The number of families is 3,026 with 18.3 percent of families classified as low-income, 22.2 percent as moderate-income, 24.5 percent as middle-income, and 35.1 percent as upper-income families.

According to Dunn and Bradstreet, as of June 2022, there were 884 non-farm businesses in Noble County, of which approximately 93.5 percent are considered small businesses. The top five largest employers include Caldwell Exempted School Village, Magnum Magnetics, Noble County Government, Summitt Acres, and Noble County Correctional Institution.

A lack of affordable housing inventory and high unemployment represent key challenges for low-and moderate-income (LMI) families to purchase homes. An increase of vacation home purchases contributes to high home prices and low supply of available single-family primary residences for sale. The AA and its surrounding areas are popular for outdoor activities such as fishing and hunting. According to the U.S. Federal Housing Finance Agency, the house price index in Noble County increased from 170.1 percent in 2020 to 212.7 percent in 2022. The economic impact of COVID-19 created an adverse housing situation for LMI homeowners due to temporary job losses from business closures. The bank provided loan forbearance intended to suspend payments due to reductions in family income in 2020. No consideration was given as loan data was not available to determine the impact on LMI families.

Due to the AA's rural nature, a limited number of community banks and credit unions serve the area. Based on the FDIC deposit market share data as of June 30, 2022, Community Savings ranked last in terms of deposit market share out of three financial institutions. The bank had \$91.6 million in deposits representing a 26.5 percent deposit market share in the AA. Major competitors include Peoples Bank and The Farmers and Merchants Bank, who held approximately 73.5 percent of deposits in Noble County.

To assess community needs, the OCC conducted an interview with a local community organization in the AA. According to the community contact, the largest credit needs in the AA are loans to small businesses and support for affordable housing. The increased demand for housing and rising home prices have made affordable housing a primary concern. There is a need for home improvement loans, home equity loans, and HELOCs for home renovations. Additionally, small businesses need working capital and equipment loans to maintain their operations.

Table A – Den	nographic I	nformation	of the Assessn	nent Area		
Assessn	nent Area: 2	2020-2021 N	oble County (	ЭH		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	33.3	66.7	0.0	0.0
Population by Geography	14,508	0.0	23.4	76.6	0.0	0.0
Housing Units by Geography	6,036	0.0	26.9	73.1	0.0	0.0
Owner-Occupied Units by Geography	4,074	0.0	26.1	73.9	0.0	0.0
Occupied Rental Units by Geography	812	0.0	26.0	74.0	0.0	0.0
Vacant Units by Geography	1,150	0.0	30.3	69.7	0.0	0.0
Businesses by Geography	612	0.0	21.4	78.6	0.0	0.0
Farms by Geography	41	0.0	19.5	80.5	0.0	0.0
Family Distribution by Income Level	3,362	20.5	22.1	25.5	31.9	0.0
Household Distribution by Income Level	4,886	26.7	17.6	18.9	36.8	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housi		\$88,204	
			Median Gross		\$574	
			Families Belo	w Poverty Le	vel	8.3%

Source: 2015 ACS and 2021 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 – Den	nographic I	nformation	of the Assessr	nent Area		
Assess	ment Area:	<b>2022 Noble</b>	County OH A	AA		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	0.0	75.0	0.0	25.0
Population by Geography	14,115	0.0	0.0	78.8	0.0	21.2
Housing Units by Geography	6,196	0.0	0.0	96.4	0.0	3.6
Owner-Occupied Units by Geography	4,052	0.0	0.0	97.8	0.0	2.2
Occupied Rental Units by Geography	917	0.0	0.0	91.4	0.0	8.6
Vacant Units by Geography	1,227	0.0	0.0	95.3	0.0	4.7
Businesses by Geography	884	0.0	0.0	92.3	0.0	7.7
Farms by Geography	61	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,026	18.3	22.2	24.5	35.1	0.0
Household Distribution by Income Level	4,969	28.2	15.6	22.1	34.1	0.0
Median Family Income Non-MSAs - OH		\$66,684	Median Housi		\$108,096	
			Median Gross		\$616	
			Families Belo	w Poverty Le	vel	10.0%

Source: 2020 U.S. Census and 2022 D&B Data

Due to rounding, totals may not equal 100.0%

## **Scope of Evaluation in Ohio**

The rating for the state of Ohio is based on a full-scope review of the performance in the Noble County, OH AA. Noble Country is the bank's sole AA in the state. It includes Community Savings' only branch office, its entire deposit base, and the majority of its home mortgage loan volume during the evaluation period. Refer to table in Appendix A for more information on the AA under review.

#### LENDING TEST

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

# Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Noble County AA is reasonable.

## Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in the State.

#### Home Mortgage Loans

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

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

#### 2020-2021

The bank's percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and aggregate lending data.

2022

There were no low- or moderate-income CTs in the AA. As such, the geographic distribution of home mortgage loans was not performed because the analysis would not be meaningful.

#### Lending Gap Analysis

No unexplained conspicuous gaps were identified.

#### 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.

The overall borrower distribution of home mortgage loans is reasonable considering performance context. The low supply of affordable homes, higher unemployment rates, and high home prices are challenging and may limit lending opportunities for LMI borrowers. Further, the bank does not offer government-backed mortgage loans which are generally more appealing to LMI families.

2020-2021

The percentage of home mortgage loans to low-income borrowers is significantly lower than the percentage of low-income families but exceeds the aggregate lending data. The percentage of home mortgage loans to moderate-income borrowers is well below the percentage of moderate-income families and the aggregate lending data.

2022

The percentage of home mortgage loans to low-income borrowers is significantly lower than the percentage of low-income families but exceeds the aggregate lending data. The percentage of home mortgage loans to moderate-income borrowers exceeds both the percentage of moderate-income families and the aggregate lending data.

#### **Responses to Complaints**

The Bank did not receive any CRA-related complaints during the evaluation period.

# Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/20 to 12/31/22		
Bank Products Reviewed:	Home mortgage loans		
Affiliate(s)	Affiliate Relationship	<b>Products Reviewed</b>	
None	Not applicable	Not applicable	
List of Assessment Areas and Typ	oe of Examination	I	
Rating and Assessment Areas	Type of Exam	Other Information	
Ohio			
Noble County, OH	Full-scope	Entire Noble County, OH	

# **Appendix B: Summary of State Ratings**

	RATINGS	COMMUNITY SAVINGS
Overall Bank:		Lending Test Rating
Ohio		Satisfactory
State:		
Ohio		Satisfactory

# **Appendix C: Definitions and Common Abbreviations**

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

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

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

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

**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.

**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.

**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.

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

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

# **Appendix D: Tables of Performance Data**

#### **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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

2020-21

	Total Home Mortgage Loans			oans	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate		% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate
Noble County, OH	30	3,180	100.0	251	0.0	0.0	0.0	26.1	26.7	19.9	73.9	73.3	80.1	0.0	0.0	0.0	0.0	0.0	0.0
Total	30	3,180	100.0	251	0.0	0.0	0.0	26.1	26.7	19.9	73.9	73.3	80.1	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 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

2022

	Total Home Mortgage Loans			Loans	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper	-Income	Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$	% 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		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	
Noble County, OH	20	1,387	100.0	186	0.0	0.0	0.0	0.0	0.0	0.0	97.8	95.0	93.5	0.0	0.0	0.0	2.2	5.0	6.5	
Total	20	1,387	100.0	186	0.0	0.0	0.0	0.0	0.0	0.0	97.8	95.0	93.5	0.0	0.0	0.0	2.2	5.0	6.5	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

#### Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2020-21

	Total Home Mortgage Loans Low-Income Borrov				orrowers	Moderate	e-Income	Borrowers	Middle-Income Borrowers			Upper-I	ncome B	Borrowers	Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Noble County, OH	30	3,180	100.0	251	20.5	6.7	4.0	22.1	10.0	17.9	25.5	36.7	23.5	31.9	46.7	39.8	0.0	0.0	14.7
Total	30	3,180	100.0	251	20.5	6.7	4.0	22.1	10.0	17.9	25.5	36.7	23.5	31.9	46.7	39.8	0.0	0.0	14.7

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

#### Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2022

Total Home Mortgage Loans				Low-In	come Bo	orrowers	Moderate-Income Borrowers			Middle-Income Borrowers			Upper-I	ncome I	Borrowers	Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Noble County, OH	20	1,387	100.0	186	18.3	5.0	4.8	22.2	45.0	25.3	24.5	10.0	26.9	35.1	40.0	28.0	0.0	0.0	15.1
Total	20	1,387	100.0	186	18.3	5.0	4.8	22.2	45.0	25.3	24.5	10.0	26.9	35.1	40.0	28.0	0.0	0.0	15.1

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.