



PUBLIC DISCLOSURE

January 23, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens Federal Savings & Loan Association
Charter Number 700824

110 North Main Street
Bellefontaine, OH 43311-2021

Office of the Comptroller of the Currency

Central Ohio Field Office
Westlake Center
4555 Lake Forest Drive, Suite 520
Cincinnati, OH 45242-3760

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

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Overall CRA Rating

The Lending Test is rated: Satisfactory.

Citizens Federal Savings and Loan Association (Citizens or the thrift) in Bellefontaine, Ohio, has a satisfactory record of meeting the credit needs of its community. The major factors supporting the satisfactory rating include:

- Lending to borrowers of different income levels reflects reasonable distribution.
- Geographic distribution of lending reflects reasonable distribution.
- Citizens makes a substantial majority of its loans inside its assessment area (AA).
- Citizens' quarterly average loan-to-deposit (LTD) ratio is more than reasonable.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development (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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

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

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

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

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

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 One 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.

Description of Institution

Citizens is a federally chartered mutual savings and loan association with total assets of \$135.1 million as of September 30, 2018. Citizens is a stand-alone mutual, with no holding company. The thrift is headquartered in Bellefontaine, Ohio, with one full-service office and a drive-thru office located in an adjacent lot. The office is located in a middle-income census tract (CT). The thrift has not opened or closed any offices since the prior CRA evaluation in 2014.

The office is open for business from 9:00 a.m. to 4:00 p.m. on Monday and Tuesday, 9:00 a.m. to 12:00 p.m. on Wednesday, 9:00 a.m. to 5:00 p.m. on Thursday and Friday, and 9:00 a.m. to 12:00 p.m. on Saturday. The office is closed on Sundays. The drive-thru office opens thirty minutes earlier than the main office. Citizens operates one automated teller machine (ATMs) at the drive-thru office.

Citizens designated one AA consisting of Logan County, Ohio (Logan County AA), in its entirety. The AA is not located in a MSA. The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- and moderate-income CTs. As of the 2010 U.S. Census, there were no low-income CTs, two moderate-income CTs, eight middle-income CTs, and one upper-income CT. As of the 2015 American Community Survey (ACS) U.S. Census, there were no low-income CTs, two moderate-income CTs, six middle-income CTs, and three upper-income CTs. Refer to Appendix B for specific details regarding the AA.

Citizens serves its community with traditional deposit accounts and one-to-four family residential real estate (home mortgage) loans. The thrift offers conventional fixed- and adjustable-rate first and second mortgages for the purchase, refinance, and home improvement of single-family residences. Citizens also offers home equity loans. As of September 30, 2018, net loans totaled \$97.2 million, representing 71.9 percent of total assets. Tier 1 capital was \$17.2 million, or 12.7 percent of total assets for the same time period. The thrift's loan originations and purchases during the lending evaluation period (2016 – 2018) were 85.1 percent residential real estate, 9.4 percent commercial/commercial real estate, 4.9 percent home equity, and 0.6 percent agriculture loans. The thrift's primary lending focus is home mortgage lending. Citizens sells a portion of their home mortgage loans to the Federal Home Loan Bank (FHLB), with \$15.1 million sold to the FHLB during the lending evaluation period.

Competition in the AA is moderate with state and national banks, savings associations, and branches of larger financial institutions. Financial institutions with significant deposit activity in the AA include Huntington National Bank and Citizens. Dominant competitors in the AA include Huntington National Bank and Liberty National Bank. As of the June 30, 2017, Federal Deposit Insurance Corporation's (FDIC's) Deposit Market Share Report, Citizens with \$119.9 million in deposits ranked second of 13 financial institutions in the AA with a 17.1 percent deposit market share. As of the June 30, 2018, FDIC's Deposit Market Share Report, Citizens with \$118.2 million in deposits

ranked second of 13 financial institutions in the AA with a 16.7 percent deposit market share.

There are no financial, legal, or other factors that impede Citizens' ability to help meet the credit needs in its AA. Citizens' previous CRA rating was "satisfactory" as of the Performance Evaluation (PE) dated April 29, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We conducted a full-scope CRA evaluation to assess the thrift's record of meeting the credit needs of its entire community, including low- and moderate-income areas. We used the small savings association CRA evaluation procedures to assess the thrift's performance. The Lending Test includes a random sample of 20 home mortgage loans originated or purchased each year in the lending evaluation period (January 1, 2016, to December 31, 2018). Home mortgage loans are the thrift's primary lending product and were evaluated under the Lending Test. For analysis purposes, we used the 2010 U.S. Census data for loans originated and purchased in 2016 and the 2015 ACS U.S. Census data for loans originated and purchased in 2017 – 2018.

Data Integrity

The thrift is not a HMDA or CRA loan data reporter. Therefore we completed transaction testing on 20 random home mortgage loans for each year in the lending evaluation period. We reviewed source documentation for each loan in the sample and did not note any data integrity issues.

Selection of Areas for Full-Scope Review

We completed a full-scope review of the thrift's only AA, the Logan County AA. Refer to the tables in Appendices A, B, and C for additional information.

Ratings

Citizens' overall rating is based on the full-scope review of the Logan County AA.

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 assessment area 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.

Conclusions with Respect to Performance Tests

LENDING TEST

Citizens' lending performance is satisfactory.

Loan-to-Deposit Ratio

Citizens' quarterly average LTD ratio is more than reasonable given its size, financial condition, and AA credit needs. The thrift's quarterly average LTD ratio over the 19 quarters since the prior CRA evaluation (March 2014 to September 2018) is 82.5 percent. The ratio ranged from a high of 85.3 percent at March 31, 2017, to a low of 79.7 percent at March 31, 2014. Since the prior CRA evaluation, the thrift's LTD ratios began trending up, with total assets and liabilities decreasing. The loan portfolio has decreased 10.8 percent. The deposit base has seen a 13.5 percent decrease. Citizens continues to sell loans to the secondary market.

We evaluated Citizens' average LTD ratio by comparing it to local competitors, which included banks with branches in the AA with total assets less than \$500 million. The quarterly average LTD ratio for similarly situated financial institutions in the AA is 66.7 percent, and Citizens' quarterly average LTD ratio of 82.5 percent compares favorably with peer.

Lending in Assessment Area

Citizens originated or purchased a substantial majority of its home mortgage loans inside its AA. The thrift's primary lending product is home mortgage lending. Citizens originated or purchased 91.7 percent of the number volume or 89.6 percent of the dollar amount of home mortgage loans in our sample inside the AA. The following table details the thrift's lending within the AA during the lending evaluation period.

| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) | |
|--|-----------------|------|---------|------|---------|---------------------------------|------|---------|------|----------------|--|
| | Inside | | Outside | | | Inside | | Outside | | | |
| | # | % | # | % | | \$ | % | \$ | % | | |
| Home Mortgage | | | | | | | | | | | |
| 2016 | 19 | 95.0 | 1 | 5.0 | 20 | 2,003 | 90.6 | 207 | 9.4 | 2,210 | |
| 2017 | 17 | 85.0 | 3 | 15.0 | 20 | 1,398 | 82.3 | 301 | 17.7 | 1,699 | |
| 2018 | 19 | 95.0 | 1 | 5.0 | 20 | 1,376 | 96.8 | 45 | 3.2 | 1,421 | |
| Total | 55 | 91.7 | 5 | 8.3 | 60 | 4,777 | 89.6 | 553 | 10.4 | 5,330 | |
| <i>Source: Loan sample of 20 loans per year in the lending evaluation period (January 1, 2016 – December 31, 2018). Due to rounding, totals may not equal 100.0 percent.</i> | | | | | | | | | | | |

Lending to Borrowers of Different Incomes

Lending to borrowers of different incomes reflects reasonable distribution.

Citizens' home mortgage lending to low- and moderate-income borrowers in 2016 is reasonable overall. The thrift's lending to low-income borrowers is excellent as it exceeds aggregate peer data. Citizens' lending to moderate-income borrowers is poor as it is significantly below aggregate peer data and the percentage of moderate-income families in the AA. The thrift did not make any loans in our sample to moderate-income borrowers. However, the loan sample included only 20 loans, or 13.0 percent, of the 154 home mortgage loans originated in 2016. The sample is a small percentage of loan originations/purchases in 2016. We note that the 11.0 percent poverty rate for families below the poverty level may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards. In addition, 21.5 percent of the total housing units in the AA are occupied rental units based on the 2010 census. We also considered the median price of housing in the AA (\$119,787) relative to the maximum income of borrowers in the low- and moderate-income category, which may demonstrate a barrier to homeownership.

The thrift's home mortgage lending to low- and moderate-income borrowers in 2017 – 2018 is reasonable. Citizens' lending to low-income borrowers is excellent as it exceeds aggregate peer data. The percentage of bank loans to moderate-income borrowers is below aggregate peer data; however, the percentage of bank loans is reasonable considering the percentage of moderate-income families in the AA. The loan sample included 40 loans, or 15.5 percent, of the 258 home mortgage loans originated/purchased in 2017 – 2018. Approximately 21.2 percent of the total housing units in the AA are occupied rental units based on the 2015 ASC Census. We also considered the median price of housing in the AA (\$117,767) relative to the maximum income of borrowers in the low- and moderate-income category, which may demonstrate a barrier to homeownership.

Refer to Table P in Appendix C and the community profiles in Appendix B for the facts and data used to evaluate the borrower distribution of the thrift's loan originations and purchases.

Geographic Distribution of Loans

Citizens' geographic distribution of loans reflects reasonable distribution. Citizens' AA consists of two moderate-income CTs, six middle-income CTs, and three upper-income CTs, as of the 2015 ACS U.S. Census data. There are no low-income CTs in the AA. The lending analysis reflected lending in most areas, with no conspicuous gaps in lending.

The thrift's geographic distribution of home mortgage lending in 2016 in the moderate-income CTs is below aggregate peer data, reflecting poor distribution. There are two moderate-income CTs in the AA, with one tract being on the outskirts of the AA. Our

sample of 20 loans did not contain any loans in moderate-income CTs; however, the sample only included a small percentage of loan originations/purchases in 2016.

The thrift's geographic distribution of home mortgage lending in 2017 – 2018 is reasonable. The thrift's percentage of lending in moderate-income CTs is greater than the percentage of owner-occupied housing units in the AA and commensurate with aggregate peer data.

Refer to Table O in Appendix C and the community profiles in Appendix B for the facts and data used to evaluate the geographic distribution of the thrift's loan originations and purchases.

Responses to Complaints

Citizens has not received any complaints about its performance in helping to meet the credit needs of its AA during the lending 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 metropolitan and nonmetropolitan areas 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 | Lending Test (excludes CD loans): 01/01/2016 – 12/31/2018 Investment and Service Tests and CD Loans: Not Applicable (NA) | |
| Financial Institution | | Products Reviewed |
| Citizens Federal Savings & Loan Association (Citizens) Bellefontaine, OH | | Residential Real Estate Loans (Home Mortgage) |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| None | | |
| List of Assessment Areas and Type of Examination | | |
| Assessment Area | Type of Exam | Other Information |
| State of Ohio Logan County AA | Full-Scope | The AA includes all census tracts in Logan County, Ohio (non-MSA). |

Appendix B: Community Profiles for Full-Scope Areas

Logan County AA

| Table A – Demographic Information of the Assessment Area (2016) | | | | | | |
|--|--------|------------|------------------------------|---------------|--------------|------------|
| Assessment Area: Logan County AA | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 11 | 0.0 | 18.2 | 72.7 | 9.1 | 0.0 |
| Population by Geography | 45,858 | 0.0 | 15.3 | 73.0 | 11.7 | 0.0 |
| Housing Units by Geography | 23,130 | 0.0 | 17.4 | 73.3 | 9.3 | 0.0 |
| Owner-Occupied Units by Geography | 13,422 | 0.0 | 11.6 | 75.3 | 13.1 | 0.0 |
| Occupied Rental Units by Geography | 4,976 | 0.0 | 31.6 | 63.1 | 5.3 | 0.0 |
| Vacant Units by Geography | 4,732 | 0.0 | 18.8 | 78.3 | 2.9 | 0.0 |
| Businesses by Geography | 2,061 | 0.0 | 17.2 | 72.5 | 10.3 | 0.0 |
| Farms by Geography | 230 | 0.0 | 3.9 | 80.4 | 15.7 | 0.0 |
| Family Distribution by Income Level | 12,774 | 21.3 | 16.2 | 22.4 | 40.1 | 0.0 |
| Household Distribution by Income Level | 18,398 | 20.6 | 16.6 | 18.1 | 44.7 | 0.0 |
| Median Family Income Non-MSAs - OH | | \$52,573 | Median Housing Value | | | \$119,787 |
| | | | Median Gross Rent | | | \$648 |
| | | | Families Below Poverty Level | | | 11.0% |
| <i>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.</i> | | | | | | |

Table A – Demographic Information of the Assessment Area (2017 – 2018)

Assessment Area: Logan County AA

| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (Census Tracts) | 11 | 0.0 | 18.2 | 54.5 | 27.3 | 0.0 |
| Population by Geography | 45,484 | 0.0 | 13.9 | 57.1 | 29.0 | 0.0 |
| Housing Units by Geography | 23,163 | 0.0 | 17.1 | 59.2 | 23.6 | 0.0 |
| Owner-Occupied Units by Geography | 13,725 | 0.0 | 10.5 | 57.1 | 32.4 | 0.0 |
| Occupied Rental Units by Geography | 4,915 | 0.0 | 28.1 | 56.4 | 15.5 | 0.0 |
| Vacant Units by Geography | 4,523 | 0.0 | 25.2 | 68.8 | 6.0 | 0.0 |
| Businesses by Geography | 2,050 | 0.0 | 16.2 | 57.9 | 25.9 | 0.0 |
| Farms by Geography | 213 | 0.0 | 3.8 | 51.2 | 45.1 | 0.0 |
| Family Distribution by Income Level | 12,733 | 19.6 | 14.6 | 23.1 | 42.7 | 0.0 |
| Household Distribution by Income Level | 18,640 | 20.6 | 15.2 | 18.3 | 45.8 | 0.0 |
| Median Family Income Non-MSAs - OH | | \$56,217 | Median Housing Value | | | \$117,767 |
| | | | Median Gross Rent | | | \$686 |
| | | | Families Below Poverty Level | | | 10.8% |

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.

Citizens designated one AA consisting of Logan County, Ohio, in its entirety. Logan County is located in the western part of Ohio and not part of any MSA. The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- or moderate-income areas. Management has not changed the AA since the previous CRA evaluation in 2014. Management selected the AA based on their targeted lending territory and office location.

The local economy is stable, with the “not seasonally adjusted” unemployment rate in Logan County of 4.4 percent as of December 2018 lower than the State of Ohio’s unemployment rate of 4.8 percent. Nationally, the unemployment rate was 3.7 percent for the same time period. 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.

The AA has a diverse mix of companies across many industries, from manufacturing to education and health services. The economy within the AA is heavily dependent upon Honda Motor Company, which is the area’s largest employer. Other major employers in Logan County include Honda Transmission Mfg., Midwest Express, Logan County government, Mary Rutan Hospital, and AGC Glass Company.

According to the 2010 U.S. Census data, the median housing value in the Logan County AA was \$119,787. Based on the 2016 median family income 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 2.7 to 4.3 times the annual income of low- and moderate-income families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some low- and moderate-income families. There are

23,130 total housing units in the AA, of which 58.0 percent are owner-occupied and 21.5 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 Logan County was \$117,767. Based on the 2017 median family income 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 2.6 to 4.1 times the annual income of low- and moderate-income families in the AA. Based on the 2018 median family income 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 2.4 to 3.8 times the annual income of low- and moderate-income families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some low- and moderate-income families. There are 23,163 total housing units in the AA, of which 59.3 percent are owner-occupied and 21.2 percent are rental occupied units. About 10.8 percent of the families are below the poverty level.

We conducted an interview with a representative from a local affordable housing organization as part of this CRA evaluation. 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.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems

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 MA/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 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) throughout those geographies. Because small business data is 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 Revenues – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer 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. Because small farm data is 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 (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer 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 throughout 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 MA/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 | | |
|------------------|---------------------------|--------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| | # | \$ | % 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 |
| Logan County AA | 20 | 2,003 | 100.0 | 1,235 | 0.0 | 0.0 | 0.0 | 11.6 | 0.0 | 11.3 | 75.3 | 90.0 | 77.1 | 13.1 | 10.0 | 11.7 | 0.0 | 0.0 | 0.0 |
| Total | 20 | 2,003 | 100.0 | 1,235 | 0.0 | 0.0 | 0.0 | 11.6 | 0.0 | 11.3 | 75.3 | 90.0 | 77.1 | 13.1 | 10.0 | 11.7 | 0.0 | 0.0 | 0.0 |

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data from Citizens' CRA loan sample; 2016 HMDA Aggregate Data; "--" data not available.
 Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" based on a sample of 20 home mortgage loans.
 **The "Overall Market" includes only loans reported by HMDA-reporting lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|------------------|---------------------------|--------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Logan County AA | 40 | 2,774 | 100.0 | 1,157 | 0.0 | 0.0 | 0.0 | 10.5 | 12.5 | 12.9 | 57.1 | 47.5 | 58.6 | 32.4 | 40.0 | 28.5 | 0.0 | 0.0 | 0.0 |
| Total | 40 | 2,774 | 100.0 | 1,157 | 0.0 | 0.0 | 0.0 | 10.5 | 12.5 | 12.9 | 57.1 | 47.5 | 58.6 | 32.4 | 40.0 | 28.5 | 0.0 | 0.0 | 0.0 |

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data from Citizens' CRA loan sample; 2017 HMDA Aggregate Data; "--" data not available.
 Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" based on a sample of 40 home mortgage loans.
 **The "Overall Market" includes only loans reported by HMDA-reporting lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
|------------------|---------------------------|--------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Logan County AA | 20 | 2,003 | 100.0 | 1,235 | 21.3 | 10.0 | 5.0 | 16.2 | 0.0 | 16.7 | 22.4 | 30.0 | 23.3 | 40.1 | 60.0 | 39.6 | 0.0 | 0.0 | 15.4 |
| Total | 20 | 2,003 | 100.0 | 1,235 | 21.3 | 10.0 | 5.0 | 16.2 | 0.0 | 16.7 | 22.4 | 30.0 | 23.3 | 40.1 | 60.0 | 39.6 | 0.0 | 0.0 | 15.4 |

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data from Citizens' CRA loan sample; 2016 HMDA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" based on a sample of 20 home mortgage loans.
**The "Overall Market" includes only loans reported by HMDA-reporting lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
|------------------|---------------------------|--------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Logan County AA | 40 | 2,774 | 100.0 | 1,157 | 19.6 | 12.5 | 6.7 | 14.6 | 12.5 | 20.1 | 23.1 | 25.0 | 23.0 | 42.7 | 50.0 | 36.8 | 0.0 | 0.0 | 13.4 |
| Total | 40 | 2,774 | 100.0 | 1,157 | 19.6 | 12.5 | 6.7 | 14.6 | 12.5 | 20.1 | 23.1 | 25.0 | 23.0 | 42.7 | 50.0 | 36.8 | 0.0 | 0.0 | 13.4 |

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data from Citizens' CRA loan sample; 2017 HMDA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" based on a sample of 40 home mortgage loans.
**The "Overall Market" includes only loans reported by HMDA-reporting lenders.