

PUBLIC DISCLOSURE

October 19, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Richwood Banking Company
RSSD# 150727

28 North Franklin Street
Richwood, Ohio 43344

Federal Reserve Bank of Cleveland

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

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, nor should it 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.

TABLE OF CONTENTS

Institution's CRA Rating	1
Scope of Examination	2
Description of Institution	4
Conclusions with Respect to Performance Criteria	6
Columbus, Ohio Metropolitan Statistical Area (<i>reviewed using full-scope review</i>)	8
Ohio Nonmetropolitan Statistical Area (<i>reviewed using limited-scope review</i>).....	17
Appendix A: CRA Core Tables	20
Appendix B: Glossary	22
Appendix C: Assessment Area Map	26

INSTITUTION'S CRA RATING: This institution is rated "Satisfactory."

- The loan-to-deposit ratio is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and assessment area credit needs;
- A majority of loans and other lending-related activities are in the assessment area;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment areas;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income);
- The distribution of loans to businesses and farms reflects a reasonable penetration among businesses of different sizes given the demographics of the assessment areas; and,
- There were no CRA-related complaints filed against the bank since the previous CRA examination.

The previous CRA evaluation conducted October 3, 2005 resulted in a rating of "Satisfactory."

SCOPE OF EXAMINATION

The evaluation of The Richwood Banking Company's (Richwood) Community Reinvestment Act (CRA) performance covered the period of July 1, 2007 through June 30, 2009. The lending test was applied in assessing the bank's performance under CRA pursuant to the Interagency Procedures and Guidelines for Small Institutions.

The lending test includes an analysis of:

- The loan-to-deposit ratio;
- The volume of loans extended inside and outside the bank's assessment area;
- The geographic distribution of loans in the assessment area, including low- and moderate-income census tracts;
- The extent of lending to borrowers of different income levels, including low- and moderate-income borrowers and businesses of different sizes, including small businesses and small farms; and,
- The bank's record of taking action in response to written complaints about its performance in helping to meet the credit needs in its assessment areas.

The loan products reviewed for this evaluation included Home Mortgage Disclosure Act (HMDA) type loans, which included home purchase and home refinance loans, small farm loans, small business loans, and consumer other secured loans. Consumer other secured loans are loans to individuals secured by anything other than real estate (i.e., automobiles, trailers, etc.).

For purposes of evaluating the geographic distribution of loans, census tracts were classified on the basis of 2000 U.S. Census data. The distribution of loans to borrowers of different income levels was based upon annually adjusted median family income data made available by the U.S. Department of Housing and Urban Development (HUD). All other demographic indices and statistics presented throughout this evaluation are based on 2000 U.S. Census data unless otherwise noted.

Loans were evaluated to determine the lending activity inside and outside the bank's assessment area. In addition, loans inside the assessment area were evaluated on the geographic and borrower income distribution for each assessment area. The geographic distribution of HMDA-type loans was evaluated by comparing the number of loans made in each geography type (moderate-, middle-, and upper-income) to the percentage of owner-occupied homes located within each geographic income category. The bank's geographic distribution with respect to small business and small farm loans were compared to the percentage of businesses and farms within each geographic income category, regardless of revenue size of the business or farm. Consumer other secured loans were assessed by comparing the percentage of loans made in each geography type (moderate-, middle-, and upper-income) to the percentage of households in each geography type.

The bank's borrower income distribution with respect to HMDA loans was assessed by comparing the percentage of loans made to borrowers in each income category (low-, moderate-, middle-, and upper-income) to the percentage of families in each income category. In addition, poverty levels were considered in the analysis. Poverty level is determined by both income and family size. Generally, a larger proportion of poverty level families are in the low-income category and, to a certain extent, the moderate-income category. Borrowers at poverty level often do not qualify for real-estate loans, so the percentage of families below poverty level was considered when evaluating lending performance to low- and moderate-income borrowers. The bank's borrower distribution with respect to small business loans was assessed by comparing the percentage of loans made to businesses in each revenue category (less than or equal to \$1 million or greater than \$1 million) to the percentage of total businesses in each revenue category.

The borrower distribution of lending with respect to farm loans was assessed by comparing the percentage of loans made to small farms in each revenue category (less than or equal to \$500,000 or greater than \$500,000) to the percentage of total farms in each revenue category.

The bank's borrower income distribution with respect to consumer loans was assessed by comparing the percentage of loans made to borrowers in each income category (low-, moderate-, middle-, and upper-income) to the percentage of households in each income category.

For this evaluation period, Richwood has two assessment areas that include the western portion of Delaware, northern Madison, and the entirety of Union Counties, which are included in the Columbus, Ohio Metropolitan Statistical Area (MSA) 18140 and the nonmetropolitan counties, which include the northern and southwest portions of Logan County and the southern portion of Marion County. The overall assessment area consists of 25 census tracts. Specifically, there are no low-income census tracts, one moderate-income census tract, 17 middle-income census tracts, and seven upper-income census tracts. There are no distressed and/or underserved middle-income census tracts in the assessment area.

HMDA-type loans received the most weight, as this loan category represented 22.0% of the bank's lending by volume and 33.0% by dollar amount during the evaluation period. Small farm loans received the second-most weight, representing 22.0% by volume and 34.0% by dollar amount of total lending during the period. Consumer loans represented 32.0% by volume and 3.6% by dollar amount of the bank's lending during the period and received the third-most weight. The least-weighted loan category is small business loans, representing 24.0% by volume and 29.0% by dollar amount during the period. Because only one (4.0%) of Richwood's census tracts are moderate-income tracts and there are no low-income tracts, a majority of the lending would be expected to be in middle-income tracts; therefore, the borrower distribution analysis received the greatest weight when rating the bank's overall CRA performance.

DESCRIPTION OF INSTITUTION

Richwood is the sole subsidiary of Richwood Bancshares, both of which are located in Richwood, Ohio. The main office is located at 28 North Franklin Street, Richwood, Ohio.

Richwood is primarily a retail lender offering a variety of deposit and credit products. The bank operates five branches (including the main office) throughout Delaware, Logan, Madison, Marion, and Union Counties, all of which have full-service automated teller machines (ATMs). The bank also has seven cash-only ATMs. In early 2009, Richwood opened one new branch at 4848 Napoleon Street in Huntsville, Ohio in Logan County. Due to the opening of this branch, the existing non-MSA assessment area was expanded to include the northern and southwest portions of Logan County.

According to the June 30, 2009 Uniform Bank Performance Report (UBPR), Richwood's total assets were valued at approximately \$241.8 million. This represents an increase of approximately 13.3% since June 30, 2008. A review of recent financial information indicates that this asset growth is attributed to an increase in the bank's real estate lending volume, as that percentage increased 14.4% since June 30, 2008. The following chart represents the bank's loan portfolio as of June 30, 2009.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2009		12/31/2008		12/31/2007	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	19,528	15.3%	11,403	9.4%	14,509	13.0%
Secured by One- to Four- Family Dwellings	36,039	28.2%	38,377	31.5%	31,529	28.3%
Other Real Estate:						
Farmland	23,171	18.1%	23,499	19.3%	14,398	12.9%
Multifamily	1,918	1.5%	1,951	1.6%	1,461	1.3%
Nonfarm nonresidential	25,078	19.6%	12,909	10.6%	11,190	10.0%
Commercial and Industrial	8,773	6.9%	21,607	17.7%	21,285	19.1%
Loans to Individuals	4,062	3.2%	3,047	2.5%	6,494	5.8%
Agricultural Loans	9,360	7.3%	9,091	7.5%	10,729	9.6%
<i>Total</i>	<i>\$127,929</i>	<i>100.00%</i>	<i>\$121,884</i>	<i>100.00%</i>	<i>\$111,595</i>	<i>100.00%</i>

* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.

The bank's assessment area complied with CRA requirements and does not arbitrarily exclude low- or moderate-income census tracts. The bank's asset size and financial condition indicate that it has the ability to effectively meet the credit needs of its assessment area. There are no legal or other impediments that would hamper the bank's ability to meet the credit needs of the community.

The following table illustrates the demographics of the bank's entire assessment area.

Combined Demographics Report

The Richwood Banking Company

Assessment Group(s): Overall

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,817	14.5
Moderate-income	1	4.0	1,178	3.6	194	16.5	5,794	17.5
Middle-income	17	68.0	22,063	66.6	1,308	5.9	8,065	24.3
Upper-income	7	28.0	9,901	29.9	294	3.0	14,466	43.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	25	100.0	33,142	100.0	1,796	5.4	33,142	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	2,162	1,083	3.1	50.1	928	42.9	151	7.0
Middle-income	34,149	23,054	66.5	67.5	6,833	20.0	4,262	12.5
Upper-income	13,045	10,511	30.3	80.6	1,869	14.3	665	5.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	49,356	34,648	100.0	70.2	9,630	19.5	5,078	10.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	176	3.9	140	3.4	23	7.6	13	8.2
Middle-income	2,855	62.9	2,587	63.4	159	52.3	109	69.0
Upper-income	1,511	33.3	1,353	33.2	122	40.1	36	22.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,542	100.0	4,080	100.0	304	100.0	158	100.0
	Percentage of Total Businesses:			89.8		6.7		3.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	8	1.1	8	1.1	0	0.0	0	0.0
Middle-income	525	72.5	521	72.4	4	100.0	0	0.0
Upper-income	191	26.4	191	26.5	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	724	100.0	720	100.0	4	100.0	0	0.0
	Percentage of Total Farms:			99.4		0.6		0.0

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Loan-to-Deposit Ratio

A financial institution's loan-to-deposit ratio compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution's lending volume relative to its capacity to lend and is derived by adding the quarterly loan-to-deposit ratios and dividing the total by the number of quarters.

Richwood's loan-to-deposit ratio is reasonable given the bank's size, financial condition, and assessment area credit needs. The bank has averaged 64.0% over the past 16 quarters of operation and is below the peer group average ratio of 84%.¹ The ratio has declined due to a 61.5% increase in total deposits since the previous examination matched to only a 24.9% increase in net loans. The increase in deposits can be mainly attributed to a rise in time deposits over \$100,000. These time deposits have increased 38.9% since June 30, 2008. Year-over-year declines in the loan portfolio have contributed to the limited lending growth during the assessment period. Commercial loans declined 59.2% and individual loans declined 36.5% since June 30, 2008. The main driver of lending growth has been in the real estate portfolio, with a 40.9% increase since third quarter 2008.

The following table shows Richwood's quarterly loan-to-deposit ratios for the 16 quarters since the previous evaluation, along with the average loan-to-deposit for the same period.

Loan-to Deposit Ratios				
As of Date	Net Loans (000s)	Total Deposits (000s)	Bank Ratio	Peer Ratio
June 30, 2009	127,726	239,173	53.4%	83.7%
March 31, 2009	125,668	227,832	55.2%	84.0%
December 31, 2008	121,907	201,611	60.5%	86.8%
September 30, 2008	117,424	192,949	60.9%	87.2%
June 30, 2008	114,415	189,258	60.5%	86.7%
March 31, 2008	111,963	196,843	56.9%	85.3%
December 31, 2007	112,299	179,139	62.7%	85.5%
September 30, 2007	114,974	170,810	67.3%	84.7%
June 30, 2007	113,979	172,350	66.1%	83.5%
March 31, 2007	111,831	169,031	66.2%	82.0%
December 31, 2006	108,173	164,649	65.7%	82.4%
September 30, 2006	108,796	160,476	67.8%	83.4%
June 30, 2006	108,014	151,389	71.3%	83.1%
March 31, 2006	106,830	150,532	71.0%	81.8%
December 31, 2005	103,161	147,395	70.0%	81.7%
September 30, 2005	102,277	148,049	69.1%	81.8%
Quarterly Loan-to-Deposit Ratio Average since the previous examination			64.0%	84.0%

¹ Peer group includes all commercial banks having assets between \$100 million and \$300 million in a metro area with three or more full service offices.

Lending in the Assessment Area

The bank’s HMDA-type loans, consumer loans, small business, and small farm loans were analyzed to determine the volume of lending inside and outside of the bank’s assessment areas. A majority of the bank’s loans at 84.9% by volume and 73.9% by dollar amount were made inside of its assessment area.

The table below depicts Richwood’s volume of loans extended inside and outside of its assessment areas during July 1, 2007 through June 30, 2009:

Lending Inside and Outside the Assessment Area								
Loan Type	Inside the Assessment Area				Outside the Assessment Area			
	# of Loans	%	\$ (000s)	%	# of Loans	%	\$ (000s)	%
HMDA	139	76.4	17,612	75.9	43	23.6	5,591	24.1
Consumer	231	88.8	2,268	88.9	29	11.2	283	11.1
Small Business	175	87.5	13,199	63.1	25	12.5	7,703	36.9
Small Farm	153	85.0	19,427	79.5	27	15.0	5,005	20.5
Total	698	84.9	52,506	73.9	124	15.1	18,583	26.1

Geographic & Borrower Distribution of Lending

Both the bank’s geographic and borrower distribution is reasonable. Refer to each assessment area’s performance evaluation for further details.

Response to Consumer Complaints

No CRA-related complaints were filed against Richwood during this evaluation period.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified. The bank continues the use of fair lending policies and procedures and has an effective fair lending training program.

**DESCRIPTION OF COLUMBUS, OHIO
METROPOLITAN ASSESSMENT AREA 18140
(Full-scope Review)**

The Columbus MSA consists of Delaware, Fairfield, Franklin, Licking, Madison, Morrow, Pickaway, and Union Counties. However, Richwood has designated its assessment area as the entirety of Union County, the western portion of Delaware County, and the northern part of Madison County. All three counties are located in the central portion of the state and are primarily rural, agricultural areas.

The overall assessment area is comprised of 14 tracts and is distributed as follows:

- Low-income: 0
- Moderate-income: 0
- Middle-income: 10
- Upper-income: 4
- Unknown-income: 0

Since the majority of the tracts in the assessment area are middle-income tracts, a majority of the lending would be expected in middle-income tracts.

There is much competition throughout the Columbus MSA. As of June 30, 2009, the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits² reported there were 57 FDIC-insured financial institutions operating 559 offices within the MSA. Within the bank's footprint only (Union, Madison, and Delaware Counties), there are 22 FDIC-insured financial institutions operating 87 offices. Delaware County Bank and Trust Company has a 21.0% market share, followed by JPMorgan Chase and National City Bank with 17.6% and 16.3%, respectively. Within this footprint, Richwood ranks sixth with a 7.9% market share.

One community contact was conducted with a Union County organization responsible for providing economic development, community improvement, and business viability to improve Union County. The contact described the economic condition of the county as stable and lagging the economic deterioration found at the national level. The county has not been exposed to the level of unemployment currently being experienced in the majority of other Ohio counties. The contact attributed this to the relatively stable companies operating in Union County. These companies include: Honda of America Manufacturing, Inc., Scotts Miracle-Gro Company, Nestle Product Technology Center, Inc., Parker Hannifin Hydraulics, Veyance Technologies, Inc., Univenture, and Select Sires. The greatest opportunity for financial institutions within Union County is to support the county-wide effort in the revitalization of historic downtowns in the county. Specifically, the contact stated that Richwood has been performing well and has been a supportive community financial institution.

² <http://www2.fdic.gov/sod/sodMarketRpt.asp?barItem=2&sCounty=all>

Population

The 2000 U.S. Census report indicated that the total population of Richwood's assessment area was 76,566. Data from the 2000 U.S. Census report stated that individuals age 25 to 64 represented 56.2% of the population, while individuals age 17 and younger comprised 26.4% of the population, and individuals age 65 and over and 18 to 24 accounted for 9.3% and 8.0% of the population, respectively. According to 2010 estimates prepared by the Ohio Department of Development, the total population of Union County is 50,740; 161,730 for Delaware County and 43,130 for Madison County.

Income Characteristics

For the purpose of evaluating the loan distribution to borrowers of different income levels, incomes were classified based upon annually adjusted median family income data made available by HUD. According to the 2000 Census, the median family income for this assessment area was \$65,300, which is above the median income level for the State of Ohio at \$51,600. According to U.S. Department of Housing and Urban Development,³ the 2009 adjusted median family income for Delaware and Madison Counties is \$68,600 and \$76,800 for Union County. From an income distribution standpoint, 14.3% of the families in the assessment area are designated as low-income, 17.6% were moderate-income, 25.0% were middle-income, and 43.1% were upper-income. In the state, 7.8% of families live below the poverty level versus 4.0% within the assessment area.

Housing

According to the 2000 U.S. Census report, there were 27,198 housing units in the bank's entire assessment area. The majority (75.5%) of these units were owner-occupied, while 19.1% represented rental units. Vacant units accounted for 5.4% of all housing units. The percentage of 1-4 family housing units was 84.7% of all housing units. Multi-family unit properties account for 5.6% of all housing units. Mobile homes represent 9.7% of the remaining housing units in this assessment area. Data further revealed that 73.4% of the assessment area's housing units were located in middle-income tracts and 26.6% were in upper-income census tracts. The median age of the housing stock was 26 years. U.S. Census data indicated that the assessment area's median housing value is \$130,216. The median gross rent was \$571. There are no low-income or moderate-income census tracts; therefore, all of the lending within this assessment area is in middle- and upper-income tracts.

³ http://www.huduser.org/datasets/il/il2009/st_mfi.odt

Labor, Employment, and Economic Characteristics

The Ohio Department of Development's Office of Strategic Research indicates that the primary types of employment in the assessment area are construction; trade, transportation, and utilities; professional and business services; and financial services based on average annual employment statistics for 2007.

According to the Ohio Department of Development, major employers in Union County are Veyance Technologies Inc., Honda Motor Co., Marysville Exempted Village Board of Education, and Memorial Hospital of Union County. The major employers in Delaware County are the Delaware City Board of Education, JP Mortgage Chase, Kroger Co., and McGraw Hill Companies. The major employers in Madison County are Battelle Memorial Institute, Kikuchi Metal, London City Board of Education, and Madison County Hospital.

The community contact specifically mentioned Honda as a valuable source of employment in the area. In particular, the Marysville plant (located in Union County) employs approximately 5,300 people, according to a February 2009 report issued by the Ohio Department of Development.⁴ The report further states, "Honda is the largest industry employer with just under 12,000 people in manufacturing operations. Honda's total employment in Ohio is about 15,000 when research and development and other activities are included. An additional 6,000-plus are employed at companies Honda describes as affiliates." The contact added that due to Honda's employment, additional businesses have been created to support the lifestyles of the employees.

In addition, the community contact provided information related to the agricultural business located within Union County. The contact stated that most crop farmers have not had difficulties gaining access to credit; however, livestock farmers have experienced above-normal difficulties accessing credit due to the deteriorating economic condition. The contact described livestock farming as inherently risky due to the uncertainties related to this type of agriculture.

According to the Ohio Job and Family Services, Office of Workforce Development,⁵ as of September 2009, the unemployment rates for the bank's assessment area were as follows:

- Union County – 8.0%
- Delaware County – 6.7%
- Madison County – 8.5%

The unemployment rates are below the seasonally adjusted national unemployment rate of 9.8% and the State of Ohio adjusted unemployment rate of 10.1%.

The following table illustrates the demographics in this assessment area.

⁴ The Ohio Motor Vehicle Industry, <http://www.odod.state.oh.us/research/files/B401000001.pdf>

⁵ <http://ohiolmi.com/laus/current.htm>

Combined Demographics Report

The Richwood Banking Company

Assessment Area(s): MSA 18140

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	2,834	14.3
Moderate-income	0	0.0	0	0.0	0	0.0	3,500	17.6
Middle-income	10	71.4	14,228	71.6	682	4.8	4,971	25.0
Upper-income	4	28.6	5,651	28.4	119	2.1	8,574	43.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	14	100.0	19,879	100.0	801	4.0	19,879	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	19,930	14,548	70.8	73.0	4,338	21.8	1,044	5.2
Upper-income	7,268	6,005	29.2	82.6	851	11.7	412	5.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	27,198	20,553	100.0	75.6	5,189	19.1	1,456	5.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	1,884	63.1	1,726	63.8	97	49.5	61	72.6
Upper-income	1,102	36.9	980	36.2	99	50.5	23	27.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,986	100.0	2,706	100.0	196	100.0	84	100.0
Percentage of Total Businesses:			90.6		6.6		2.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	340	75.7	339	75.7	1	100.0	0	0.0
Upper-income	109	24.3	109	24.3	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	449	100.0	448	100.0	1	100.0	0	0.0
Percentage of Total Farms:			99.8		0.2		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Geographic Distribution of Lending

During this review period, there were no significant gaps in lending noted. Richwood made loans in 86.0% (12 out of 14) of its census tracts, including 90.0% (9 out of 10) in middle-income census tracts and 75.0% (3 out of 4) in upper-income census tracts. The two census tracts that did not receive lending are located on the border of the assessment area, a considerable distance from the nearest branch office.

An analysis of the geographic distribution of loans was conducted to determine the dispersion of loans among different income categories by census tract within the assessment area. There are no low- or moderate-income census tracts located within this assessment area; therefore, minimal weight will be placed on this analysis into the overall rating evaluation.

Richwood's loan production reflects a reasonable penetration of lending among various incomes census tracts within its assessment area.

HMDA Loans

The percentage of owner-occupied housing units contained within the various income categories is used as a proxy to estimate demand for residential mortgage lending within such census tracts. Penetration throughout the assessment area is reasonable.

In this assessment area, Richwood's lending indicates that 95 (82.6%) of its loans were originated in the middle income tracts and 20 (17.4%) were in upper-income tracts, compared to the percentage of owner-occupied units in middle- and upper-income geographies at 70.8% and 29.2%, respectively.

The table below indicates the geographic distribution of small farm and small business loans for this assessment area.

Geographic Distribution of HMDA Loans						
Assessment Area/Group: MSA 18140						
	Total HMDA Loans		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans
Home Purchase	43	37.4	70.8	76.7	29.2	23.3
Refinance	72	62.6	70.8	86.1	29.2	13.9

Small Farm Loans

The geographic distribution of small farm loans was analyzed to determine the dispersion of these loans among different income categories within the assessment area. Penetration throughout the assessment area is reasonable.

The bank originated 111 (87.4%) and 16 (12.6%) of its small farm loans in middle- and upper-income tracts, compared to the percent of farms located in these tracts at 75.7% and 24.3%, respectively.

Consumer Other Secured Loans

The percentage of households located within designated census tracts is used as a proxy to estimate demand for consumer lending within such census tracts. Penetration throughout the assessment area is reasonable.

There were 169 (87.1%) consumer loans made in middle-income census tracts, which was significantly greater than the 73.4% of households positioned in the bank’s middle-income tracts. There were 25 (12.9%) consumer loans made in upper-income tracts, which was below the 26.6% of households located in upper-income tracts.

Small Business Loans

The geographic distribution of small business loans was analyzed to determine the dispersion of these loans among different census tracts within the assessment area. Penetration throughout the assessment area is reasonable.

The bank originated 119 (79.9%) and 30 (20.1%) of its small business loans in middle- and upper-income tracts, compared to the percentages of businesses located in these tracts at 63.1% and 36.9%, respectively.

The table below indicates the geographic distribution of small farm and small business loans for this assessment area.

Geographic Distribution of Small Loans to Businesses and Farms						
Assessment Area/Group: MSA 18140						
	Total Loans		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans
Small Business	149	54.0	63.1	79.9	36.9	20.1
Small Farm	127	46.0	75.7	87.4	24.3	12.6

Borrower Distribution of Lending

HMDA loans, consumer, small business, and small farm lending data was analyzed in conjunction with a review of the demographic and economic characteristics of the assessment area to determine the extent of lending to borrowers of different income categories and to businesses/farms of different revenue sizes. The percentage of households by income category in the assessment area is used as a proxy to estimate demand for consumer lending. The percentage of the families below poverty in this assessment area is 4.0%. This analysis revealed a reasonable penetration among borrowers of different income levels and a reasonable distribution of lending to businesses/farms of different revenue sizes.

HMDA Loans

Richwood originated 19 (16.5%) HMDA loans to low-income borrowers, which was greater than the percentage of low-income families at 14.3%. Given the high owner-occupancy rate of 75.6% (raising the expected level of HMDA-type lending), elevated unemployment in the area, and poverty rates, lending to low-income borrowers is excellent.

The bank originated 19 (16.5%) of its HMDA loans to moderate-income families, which is generally in line with percentage of moderate-income families at 17.6%. Given the factors described above, the distribution of HMDA loans to moderate-income borrowers is good.

Richwood originated 21 loans (18.3%) and 55 (47.8%) of its HMDA loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 25% and 43.1%, respectively. The borrower's income was not available for 0.9% of the HMDA type loans made in this assessment area.

The table below indicates the borrower distribution of HMDA loans for this assessment area.

Borrower Distribution of HMDA Loans										
Assessment Area/Group: MSA 18140										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans
Home Purchase	43	37.4	14.3	20.9	17.6	16.3	25.0	7.0	43.1	53.5
Refinance	72	62.6	14.3	13.9	17.6	16.7	25.0	25.0	43.1	44.4

Small Farm Loans

An analysis of small farm lending data was conducted to ascertain the extent of lending to farms of different sizes. Of the 127 small farm loans originated by the bank, 60 (47.2%) were originated to farms with less than \$500,000 in revenue, compared to 99.8% of small farms in the assessment area. Additionally, 53 (41.7%) of the small farm loans did not have a reported revenue, which distorts the given amount of small farm lending.

A further analysis of small farm lending shows 71.7% of the bank's small farm loans extended was in an amount of \$100,000 or less. Additionally, 81.7% of the small farm lending was in the amount of \$100,000 or less and to farms less than \$1 million in revenues. Since smaller-size loans are generally commensurate with the borrowing needs of smaller farms and nearly 70.0% of the land in Union County is for cropland (53% of the land in Delaware County and 81.0% of the land in Madison County has been designated as crop land),⁶ Richwood's lending activity demonstrates that the bank is meeting the credit needs of such farms. Based on this analysis, small farm lending is good.

Consumer Other Secured Loans

Richwood originated 28 (14.4%) consumer other secured type loans to low-income borrowers, which was in line with the percentage (16.0%) of households located within the assessment area. Provided the elevated unemployment in the area and poverty rates, lending to low-income borrowers is good.

The bank originated 31 (16%) of its consumer other secured lending to moderate-income households, which is above the percentage of moderate-income households at 14.4%. Given the factors described above, the distribution of HMDA loans to moderate-income borrowers is excellent.

Richwood originated 12 (6.2%) and 23(11.9%) of its consumer other secured loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income households at 21.0% and 48.7%, respectively. The borrower's income was not available for 51.5% of the consumer other secured loans made in this assessment area.

Small Business Loans

An analysis of small business lending data was conducted to ascertain the extent of lending to businesses of different sizes, including small businesses. Of the 149 small business loans originated by the bank, 50 (33.6%) were originated to businesses with less than \$1 million in revenue, compared to 90.6% of small businesses in the assessment area.

A further analysis of small business lending shows that 78.5% of the bank's small business loans were extended in an amount of \$100,000 or less. Additionally, 78.0% of the small business lending was in the amount of \$100,000 or less and to businesses with less than \$1 million in revenue. Since smaller-size loans are generally commensurate with the borrowing needs of smaller businesses, Richwood's lending activity demonstrates that the bank is meeting the credit needs of such businesses. Based on this analysis, the bank's lending to small business is considered good.

⁶ Ohio County Profiles, Prepared by the Office of Policy, Research and Strategic Planning – Ohio Department of Development

The table below indicates the borrower distribution of small farm and small business loans for this assessment area.

Borrower Distribution of Small Loans to Businesses and Farms							
Assessment Area/Group: MSA 18140							
	Total Loans		Businesses/Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses/ Farms	% Bank Loans	\$100,000 or Less	>\$100,001 to \$250,000	>\$250,001 to \$1,000,000
Small Business	149	54.0	90.6	33.6	78.5	15.4	5.4
Small Farm	127	46.0	99.8	47.2	71.7	13.4	11.0

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE OHIO
NONMETROPOLITAN STATISTICAL AREA**
(Limited-scope Review)

For CRA purposes, Richwood has a second assessment area that includes the northern and southwest portions of Logan County and the southern portion of Marion County. Logan County is comprised of a total of 11 census tracts and Marion County is comprised of a total of 18 census tracts. This entire assessment area is comprised of only one moderate-, seven middle-, and three upper-income tracts.

During the evaluation period, Richwood originated 24 HMDA loans totaling \$2,340,000 and 37 consumer other secured loans amounting to \$299,000 in this assessment area. Additionally, the bank originated 26 small business loans totaling \$581,000 and 26 small farm loans totaling \$4,083,000 in this assessment area during this review period. The bank, however, made no loans in the moderate-income tracts, two of the middle-income tracts, and one upper-income census tracts during this evaluation period. Further, the bank expanded the assessment area to include the northern and southwest portions of Logan County in early 2009 due to the opening of a new branch in Huntsville, Ohio. The four census tracts that did not receive any lending are located in Logan County. Since this branch was only in operation for a short time period prior to this evaluation, the bank had a limited opportunity to lend in this assessment area; therefore, the gaps in lending are deemed appropriate. As a result of the limited lending, a limited-scope review was conducted.

One community contact was conducted within this assessment area. The community contact was located in Logan County with a government planning organization responsible for the management of a village and providing services to its residents. The community contact indicated that closures of local plants have had a negative effect on the county's economy. The contact did credit Honda as being a stable employment source in the area. The contact added that housing and new home building in the West Mansfield area has been limited until recently due to the lack of sewer and water taps. Additionally, the contact stated that there is credit available in the community from local lenders without going to the larger financial institutions.

Richwood has two branch offices and one cash-only ATM in this assessment area. According to the June 30, 2009 FDIC Deposit Market Share Report, Richwood ranked 11th of 13 institutions in the market with a deposit share of 1.2% within Logan County.⁷ Huntington ranked first with 26.3% of the market share of deposits with three office locations, Citizens Federal Savings and Loan Association of Bellefontaine ranked second with 21.2% of the market share with one office location, and Citizens Banking Company ranked third with 11.4% of the market share of deposits with three office locations. Richwood ranked ninth out of 10 institutions in the market with a deposit share of 3.2% within Marion County.⁸ Fahey Banking Company ranked first with 19.2% of the market share of deposits with four office locations, Ohio State Bank ranked second with 16.5% of the market share with three office locations, and National City Bank ranked third with 15.7% of the market share of deposits with three office locations.

⁷ <http://www2.fdic.gov/sod/sodMarketRpt.asp?barItem=2>

⁸ <http://www2.fdic.gov/sod/sodMarketRpt.asp?barItem=2>

The table below illustrates the demographics in this assessment area.

Combined Demographics Report

The Richwood Banking Company

Assessment Area(s): NonMSA OH

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,983	15.0
Moderate-income	1	9.1	1,178	8.9	194	16.5	2,294	17.3
Middle-income	7	63.6	7,835	59.1	626	8.0	3,094	23.3
Upper-income	3	27.3	4,250	32.0	175	4.1	5,892	44.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	11	100.0	13,263	100.0	995	7.5	13,263	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	2,162	1,083	7.7	50.1	928	42.9	151	7.0
Middle-income	14,219	8,506	60.3	59.8	2,495	17.5	3,218	22.6
Upper-income	5,777	4,506	32.0	78.0	1,018	17.6	253	4.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	22,158	14,095	100.0	63.6	4,441	20.0	3,622	16.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	176	140	10.2	23	21.3	13	17.6	
Middle-income	971	861	62.7	62	57.4	48	64.9	
Upper-income	409	373	27.1	23	21.3	13	17.6	
Unknown-income	0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	1,556	1,374	100.0	108	100.0	74	100.0	
	Percentage of Total Businesses:			88.3		6.9	4.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	8	8	2.9	0	0.0	0	0.0	
Middle-income	185	182	66.9	3	100.0	0	0.0	
Upper-income	82	82	30.1	0	0.0	0	0.0	
Unknown-income	0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	275	272	100.0	3	100.0	0	0.0	
	Percentage of Total Farms:			98.9		1.1	0.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance resulting from the lending test in this assessment area is consistent with the bank's lending in the other assessment area.

Facts and data reviewed can be found in the core tables accompanying this report.

APPENDIX A

CRA CORE TABLES

Borrower Distribution of HMDA Loans										
Assessment Area/Group: Overall										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans
Home Purchase	55	39.6	14.5	18.2	17.5	16.4	24.3	5.5	43.6	58.2
Refinance	84	60.4	14.5	11.9	17.5	15.5	24.3	25.0	43.6	47.6

Geographic Distribution of HMDA Loans									
Assessment Area/Group: Overall									
	Total HMDA Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		
	#	% of Total	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans	% Bank Loans
Home Purchase	55	39.6	3.1	0.0	66.5	74.5	30.3	25.5	
Refinance	84	60.4	3.1	0.0	66.5	84.5	30.3	15.5	

Borrower Distribution of Small Loans to Businesses and Farms							
Assessment Area/Group: Overall							
	Total Loans		Businesses/Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses/Farms	% Bank Loans	\$100,000 or Less	>\$100,001 to \$250,000	>\$250,001 to \$1,000,000
Small Business	175	53.4	89.8	32.0	81.1	13.7	4.6
Small Farm	153	46.6	99.4	46.4	70.6	13.1	11.8

Geographic Distribution of Small Loans to Businesses and Farms								
Assessment Area/Group: Overall								
	Total Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses/Farms	% Bank Loans	% of Businesses/Farms	% Bank Loans	% of Businesses/Farms	% Bank Loans
Small Business	175	53.4	3.9	0.0	62.9	81.1	33.3	18.9
Small Farm	153	46.6	1.1	0.0	72.5	85.6	26.4	14.4

Geographic Distribution of HMDA Loans								
Assessment Area/Group: NonMSA OH								
	Total HMDA Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans
Home Purchase	12	50.0	7.7	0.0	60.3	66.7	32.0	33.3
Refinance	12	50.0	7.7	0.0	60.3	75.0	32.0	25.0

Borrower Distribution of HMDA Loans										
Assessment Area/Group: NonMSA OH										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans
Home Purchase	12	50.0	15.0	8.3	17.3	16.7	23.3	0.0	44.4	75.0
Refinance	12	50.0	15.0	0.0	17.3	8.3	23.3	25.0	44.4	66.7

Geographic Distribution of Small Loans to Businesses and Farms								
Assessment Area/Group: NonMSA OH								
	Total Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses/Farms	% Bank Loans	% of Businesses/Farms	% Bank Loans	% of Businesses/Farms	% Bank Loans
Small Business	26	50.0	88.3	0.0	62.4	88.5	26.3	11.5
Small Farm	26	50.0	98.9	0.0	72.5	76.9	26.4	23.1

Geographic Distribution of Small Loans to Businesses and Farms								
Assessment Area/Group: NonMSA OH								
	Total Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses/Farms	% Bank Loans	% of Businesses/Farms	% Bank Loans	% of Businesses/Farms	% Bank Loans
Small Business	26	50.0	11.3	0.0	62.4	88.5	26.3	11.5
Small Farm	26	50.0	2.9	0.0	67.3	76.9	29.8	23.1

APPENDIX B

GLOSSARY

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

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

Community development: All Agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

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

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

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

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

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated 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.

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

APPENDIX C

ASSESSMENT AREA MAP

The Richwood Banking Company
Assessment Area: Overall

