

PUBLIC DISCLOSURE

May 16, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Minster Bank
RSSD #604024

95 West 4th Street
Minster, Ohio

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.

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INSTITUTION'S CRA RATING: This institution is rated "Satisfactory"
The Lending Test is rated: "Satisfactory"
The Community Development Test is rated: "Satisfactory"

The major factors and criteria contributing to this rating include:

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs;
- A substantial 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 area;
- 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 reflects a reasonable penetration among businesses of different revenue sizes given the demographics of the assessment areas; and
- There were no CRA-related complaints filed against the bank since the previous CRA examination: and;
- The bank's community development performance demonstrates an adequate responsiveness to the community development needs of the assessment area, considering the bank's capacity and the need and availability of such opportunities in the bank's assessment area.

The previous CRA examination conducted May 7, 2012 resulted in a rating of "Satisfactory."

SCOPE OF EXAMINATION

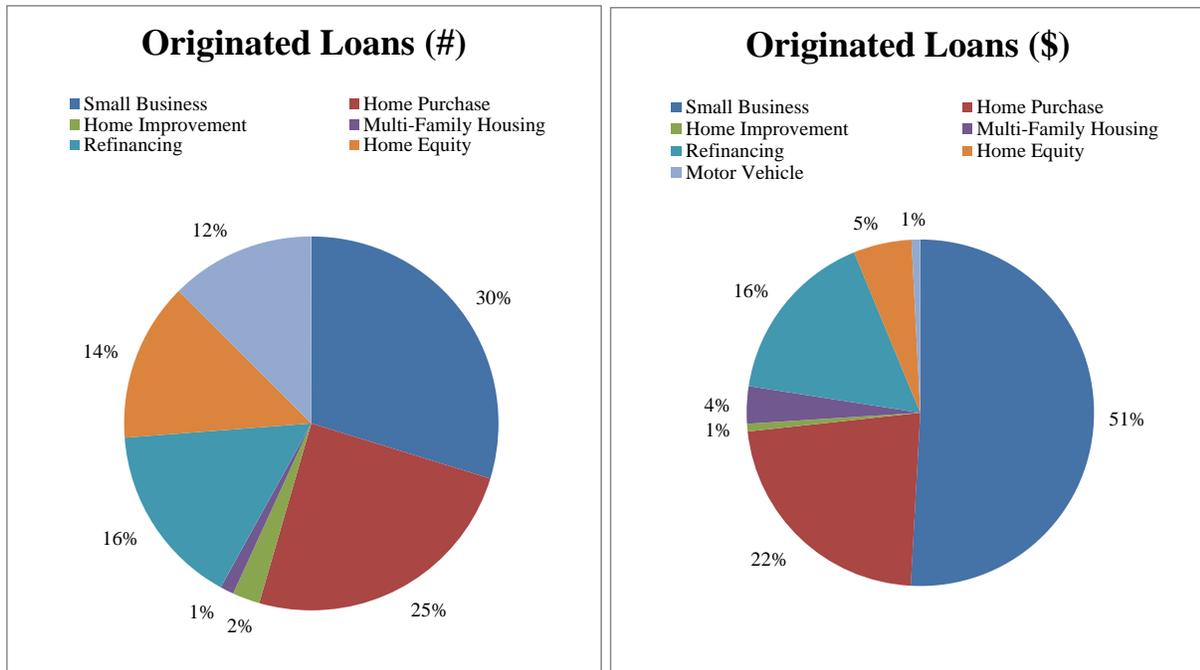
Minster Bank's (Minster) Community Reinvestment Act (CRA) performance was evaluated using the interagency intermediate small bank examination procedures under Regulation BB.

Minster's performance was evaluated based on lending data for the period of January 1, 2015 to December 31, 2015. Small business, residential, and consumer loans (comprised of home equity and motor vehicle) were evaluated under the lending test. There were not enough small farm, home improvement, or multi-family housing loans during this review period to conduct a meaningful analysis and therefore were not considered during this evaluation. In addition, there were not enough consumer loans to conduct a meaningful analysis in the Dayton, OH Metropolitan Statistical Area #19380 (Dayton MSA).

Community development activities for the period May 7, 2012 through May 15, 2016 were also reviewed as part of this evaluation, specifically community development loans, investments, donations, and services.

The following table and charts illustrate the volume and distribution of loans originated within Minster's assessment area during the evaluation period.

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
Small Business	202	52,785
Home Purchase	168	23,219
Home Improvement	16	731
Multi-Family Housing	8	3,603
Refinancing	107	16,924
Home Equity	93	5,617
Motor Vehicle	85	847
Total	679	103,726



Based on the total loan volume by number and dollar amount, small business and HMDA loans (home purchase and refinance) received the greatest weight, followed by home equity and motor vehicle loans in Nonmetropolitan Ohio.

For the purpose of this evaluation, borrower distribution under the lending test received greater weight than geographic distribution because the total assessment area is comprised mostly of middle-income geographies and there are fewer low- and moderate-income census tracts.

In some cases, information for originated loans could not be provided by the bank. Therefore, the loan volumes used for borrower distribution are based on a sample of originated loans and are lower than the number of originated loans listed above.

The size and financial condition of the institution, lending opportunities within the assessment area, and competition with other institutions were also considered in Minster's performance context.

DESCRIPTION OF INSTITUTION

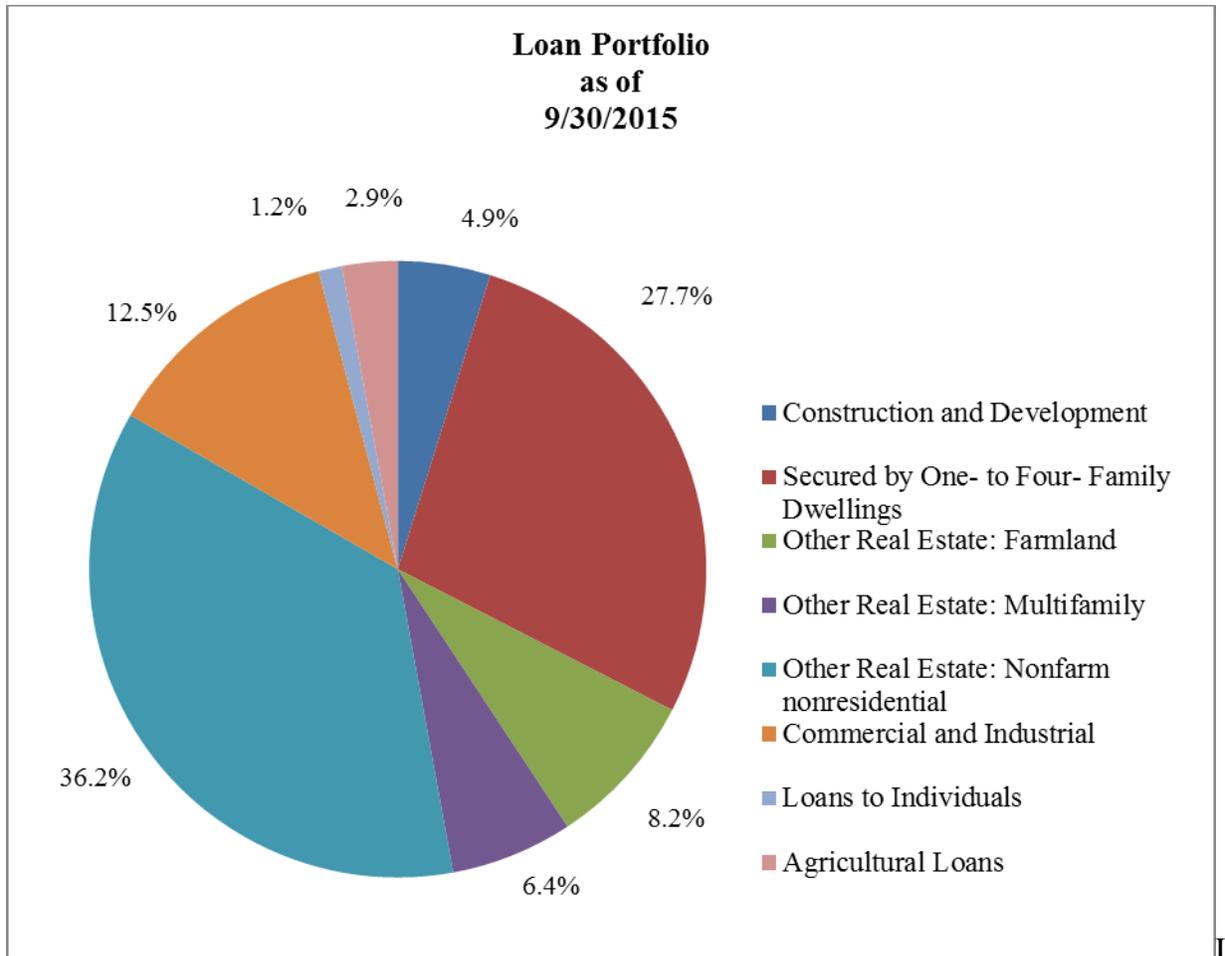
Minster is the banking subsidiary of Minster Financial Corporation, a financial holding company, which is located in Minster, Ohio. As of December 31, 2015, Minster reported \$425 million in total assets, which is an increase of 29.6% since the previous CRA evaluation.

Minster is a full-service retail bank offering business and consumer deposit accounts and commercial, residential, and consumer loans. Minster has one main office and six branch offices. Since the previous evaluation, Minster has not opened or closed any branch offices or ATMs. The main office and four additional offices are located in Auglaize County. The remaining two offices are located in Shelby and Miami counties. All offices have full-service ATMs. Minster also operates a loan production office in Dayton.

As of December 31, 2015, net loans and leases represent \$230 million or 54.0% of total assets. Net loans and leases increased by 24.3% since the previous CRA evaluation. The following table and chart shows the composition of Minster's loan portfolio as of September 30, 2015.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	9/30/2015		12/31/2014		12/31/2013	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development Secured by One- to Four- Family Dwellings	10,784	4.9%	10,355	4.8%	10,396	5.1%
Other Real Estate: Farmland	61,549	27.7%	58,760	27.0%	54,898	26.9%
Other Real Estate: Multifamily	18,167	8.2%	16,052	7.4%	12,198	6.0%
Other Real Estate: Nonfarm nonresidential	14,214	6.4%	14,176	6.5%	11,112	5.5%
Commercial and Industrial	80,462	36.2%	74,860	34.4%	75,930	37.3%
Loans to Individuals	27,859	12.5%	31,611	14.5%	29,185	14.3%
Agricultural Loans	2,725	1.2%	3,105	1.4%	3,268	1.6%
	6,466	2.9%	8,670	4.0%	6,803	3.3%
<i>Total</i>	<i>\$222,226</i>	<i>100.00%</i>	<i>\$217,589</i>	<i>100.00%</i>	<i>\$203,790</i>	<i>100.00%</i>

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



Minster’s investment portfolio as of December 31, 2015 was \$173 million, which represented 40.7% of total assets. The investment portfolio is made up of U.S. Treasuries & Agencies (17.2%), Municipal Securities (44.6%), mortgage-backed securities (38.0%), and other investments (0.2%).

There are no legal or financial constraints preventing Minster from meeting the credit needs of its assessment area consistent with its asset size, business strategy, resources, and local economy.

DESCRIPTION OF ASSESSMENT AREAS

Minster's CRA-delineated footprint comprises two assessment areas within Ohio. Nonmetropolitan Ohio consists of the entireties of Auglaize, Darke, Mercer, and Shelby counties. The Dayton MSA is comprised of the entirety of Miami and Montgomery counties.

Minster's CRA-delineated footprint consists of 216 census tracts, of which there are 20 low-, 47 moderate-, 104 middle-, and 44 upper-income census tracts, as well as one unknown tract. Minster's main office and three other branch offices are located in upper-income census tracts. The remaining three branch offices are located in middle-income census tracts. None of the middle-income tracts are designated as distressed or underserved.

Since the previous evaluation, Minster expanded the Dayton MSA to include Montgomery County. Montgomery County has the largest population of all counties in the assessment area, with Dayton as the county seat. According to the 2010 U.S. Census Bureau Report, the population in Montgomery County was 535,153. Competition is high, as several major banks operate in this area. Minster has a loan production office on the north side of Dayton and the nearest branch office is located in Miami County, north of Montgomery County. The population of Miami County, which is 85.7% cropland, pasture, and forest, was 102,506. The counties in Nonmetropolitan Ohio are also mostly rural. Auglaize County is 90.7% cropland, pasture, and forest, with a population of 45,949; Darke County is 97.2% cropland, pasture, and forest, with a population of 52,959; Mercer County is 91.9% cropland, pasture, and forest, with a population of 40,814; and Shelby County is 95.7% cropland, pasture, and forest, with a population of 49,423. Outside of Auglaize County, the majority of the population in Darke, Mercer, and Shelby counties does not reside within reasonable proximity to Minster's branch offices.

As of June 30, 2015, the Federal Deposit Insurance Corporation (FDIC) reported 37 insured financial institutions operating within Auglaize, Darke, Mercer, Miami, Montgomery, and Shelby counties. The FDIC's market share report indicates that Minster ranked 11th with 2.68% of the market share of deposits.¹ The following table illustrates the deposit market share for the top 11 financial institutions in the counties.

¹ <http://www2.fdic.gov/sod/sodMarketBank.asp>

#	Financial Institution	Deposit Market Share
1	Fifth Third Bank	21.63%
2	JPMorgan Chase Bank, National Association	15.86%
3	PNC Bank, National Association	10.76%
4	U.S. Bank National Association	7.54%
5	KeyBank National Association	5.91%
6	First Financial Bank, National Association	4.74%
7	The Park National Bank	3.88%
8	The Huntington National Bank	3.46%
9	The Peoples Bank Co.	3.08%
10	Union Savings Bank	2.84%
11	Minster Bank	2.68%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Minster’s overall performance under the lending test is considered satisfactory. The loan-to-deposit ratio is reasonable and Minster made a substantial majority of loans in its assessment area. The geographic and borrower distribution is reasonable for each assessment area.

Loan-to-Deposit Ratio

A financial institutions loan-to-deposit (LTD) 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 LTD ratios and dividing by the total number of quarters.

The following table shows Minster’s quarterly LTD ratios for 16 quarters since the previous evaluation, along with the average LTD ratios for three local peer banks for the same period. The custom peer LTD ratio is the combined aggregate LTD ratio for the three peer banks.

Minster Bank Loan-to-Deposit Ratios					
AS OF DATE	MINSTER BK	GREENVILLE NB	FIRST NB IN NEW BREMEN	PEOPLES BK CO	CUSTOM PEER
December 31, 2015	62.19	81.30	50.88	52.61	61.60
September 30, 2015	61.59	80.15	50.74	52.08	60.99
June 30, 2015	62.48	79.28	50.51	53.67	61.15
March 31, 2015	61.12	78.98	49.95	53.54	60.82
December 31, 2014	64.45	79.96	49.84	55.65	61.82
September 30, 2014	60.54	79.77	50.97	55.17	61.97
June 30, 2014	60.75	79.62	50.41	52.20	60.74
March 31, 2014	59.97	76.33	51.53	51.23	59.70
December 31, 2013	62.88	76.91	50.23	53.76	60.30
September 30, 2013	59.39	74.77	51.83	52.62	59.74
June 30, 2013	60.25	72.99	50.15	55.12	59.42
March 31, 2013	57.18	71.34	49.08	53.43	57.95
December 31, 2012	61.55	71.08	48.80	54.33	58.07
September 30, 2012	62.38	73.60	48.78	53.94	58.77
June 30, 2012	62.13	73.73	49.37	55.56	59.55
March 31, 2012	61.23	72.49	49.08	57.01	59.53
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation	61.26	76.39	50.13	53.87	60.13

Minster’s LTD ratio is reasonable given its size, financial condition, and assessment area credit needs. Minster has averaged an LTD ratio of 61.3% over the past 16 quarters of operation, which is higher than the custom peer group average ratio of 60.1%.

Lending in the Assessment Area

Minster’s small business, HMDA, and consumer loans were analyzed to determine the volume of lending inside and outside its assessment area. Of the total loans, 93.2% by volume and 92.7% by dollar were made inside the assessment area.

The following table shows the distribution of loans made inside and outside Minster’s assessment area.

Lending Inside and Outside the Assessment Area

Exam: Minster 2016

Loan Type - Description	Inside				Outside				Total	
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	\$(000s)
HE - Home Equity	89	95.7	5,546	98.7	4	4.3	71	1.3	93	5,617
MV - Motor Vehicle	83	97.6	819	96.7	2	2.4	28	3.3	85	847
Total Consumer related	172	96.6	6,365	98.5	6	3.4	99	1.5	178	6,464
CV - Home Purchase - Conventional	151	89.9	19,645	84.6	17	10.1	3,574	15.4	168	23,219
HI - Home Improvement	16	100.0	731	100.0	0	0.0	0	0.0	16	731
MF - Multi-Family Housing	8	100.0	3,603	100.0	0	0.0	0	0.0	8	3,603
RF - Refinancing	101	94.4	16,108	95.2	6	5.6	816	4.8	107	16,924
Total HMDA related	276	92.3	40,087	90.1	23	7.7	4,390	9.9	299	44,477
SB - Small Business	185	91.6	49,680	94.1	17	8.4	3,104	5.9	202	52,785
Total Small Bus. related	185	91.6	49,680	94.1	17	8.4	3,104	5.9	202	52,785
TOTAL LOANS	633	93.2	96,132	92.7	46	6.8	7,593	7.3	679	103,726

A substantial majority of Minster’s loans by volume and dollar amount were made inside its assessment area.

Geographic Distribution of Lending

Minster’s geographic distribution of lending is reasonable. The dispersion of loans among different tract income categories is good. Small business, HMDA, and consumer lending were all considered good. The respective analysis is included within each assessment area evaluation in this report. Minster did not have any significant lending gaps within Nonmetropolitan Ohio; however, significant gaps were noted in the Dayton MSA. The respective analysis can be found within subsequent sections of this report.

In addition to traditional bank products, Minster originates loans through flexible lending programs. These types of programs can allow financial institutions to address credit needs of low- and moderate-income borrowers in a safe and sound manner. During the review period, Minster originated the following number and dollar amount of loans through flexible loan programs:

	Number of Originations	Total Loan Amount
Government Lending Programs:		
USDA Rural Development Program	5	\$540,900
Farm Service Agency	1	\$278,258
Welcome Home Program	9	\$766,775
Home Possible Advantage Program	6	\$586,150

Borrower Distribution of Lending

Minster’s lending to borrowers of different income categories and businesses of different revenue sizes is considered reasonable. Small business lending was excellent, while HMDA and consumer lending were both good. The respective analysis can be found within subsequent sections of this report.

Response to Consumer Complaints

The bank has not received any CRA-related complaints since the previous examination.

Community Development Test

Minster’s performance under the community development test is considered satisfactory. Minster’s performance demonstrates an adequate responsiveness to the needs of its assessment area through community development loans, qualified investments, and services, considering its capacity and the need and availability of opportunities in its assessment area.

Minster conducted community development activities in both Nonmetropolitan Ohio and the Dayton MSA. In addition, Minster made three investments totaling \$875,000 outside of the assessment area to support schools that serve low- and moderate-income students. Refer to the performance test conclusions for each assessment area later in the report for details about Minster’s community development loans, services, and investments.

Fair Lending or Other Illegal Credit Practices Review

No evidence of discrimination or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE
NONMETROPOLITAN OHIO ASSESSMENT AREA
(Full-scope Review)**

Nonmetropolitan Ohio encompasses the entirety of Auglaize, Darke, Mercer, and Shelby counties. This assessment area consists of a total of 42 census tracts, of which there are three moderate- (7.1%), 27 middle- (64.3%), and 12 upper-income tracts (28.6%). None of the middle-income tracts are designated as distressed or underserved. Minster operates six offices in this assessment area: five in Auglaize County, one of which includes the main office, and one office in Shelby County.

According to the June 30, 2015 FDIC Deposit Market Share Report,² Minster ranked sixth out of 23 institutions in the market with a deposit share of 8.0%. The largest institutions by deposit share include larger regional financial institutions, such as US Bank National Association (10.8%); The Peoples Bank Co. (10.2%); JPMorgan Chase Bank, National Association (9.7%); First Financial Bank, National Association (8.8%); and The Park National Bank (8.5%).

#	Financial Institution	Deposit Market Share
1	U.S. Bank National Association	10.84%
2	The Peoples Bank Co.	10.19%
3	JPMorgan Chase Bank, National Association	9.74%
4	First Financial Bank, National Association	8.84%
5	The Park National Bank	8.53%
6	Minster Bank	8.02%
7	Greenville National Bank	7.90%
8	First National Bank in New Bremen	5.77%
9	The St. Henry Bank	5.63%
10	Fifth Third Bank	4.28%

One community contact interview was conducted within this assessment area. The community contact was an economic development agency committed to attracting and expanding business-related activities in Auglaize County. The contact stated economic conditions in Auglaize County are strong with very low unemployment rates due to residents’ strong work ethics. The contact also stated that banks, especially local community banks, are meeting the credit needs of the community.

² <http://www2.fdic.gov/sod/sodMarketBank.asp>

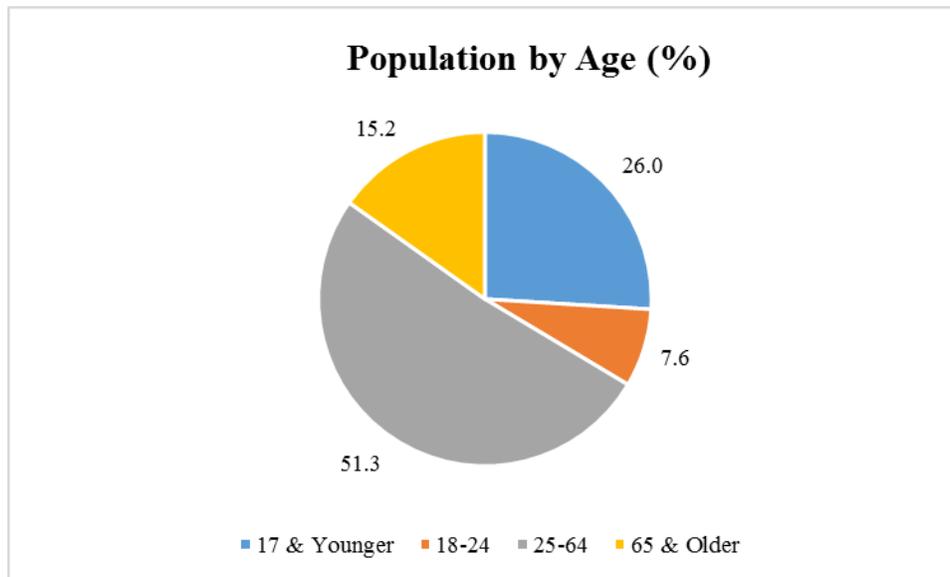
Population Characteristics

According to the 2010 U.S. Census Bureau Report, the total population in Nonmetropolitan Ohio was 189,145. The following table shows the 2010 and 2014 population of the four counties within Minster’s assessment area, as well as the estimated population change. As shown in the table, there was a slight decline in population growth from 2010 to 2014.³

County	2010 Population	2014 Population	Population Percent Change
Auglaize	45,949	45,841	-0.2%
Darke	52,959	52,196	-1.4%
Mercer	40,814	40,831	0.0%
Shelby	49,423	48,951	-1.0%
Total	189,145	187,819	

Approximately, 7.1% of the assessment area’s population resides in moderate-income tracts and 64.3% in middle-income tracts, while 28.6% reside in upper-income tracts.

Based on 2010 U.S. Census Bureau data, the population by age is distributed as follows:



Approximately 26.0% of the population is under 18, while approximately 74.1% of the population is 18 years of age or older, which is the legal age to enter into a contract and the prime ages when individuals are generally in need of loans.

³ American Fact Finder; <http://factfinder2.census.gov>

Income Characteristics

According to 2010 U.S. Census data, the median family income for the assessment area was \$57,508, compared to Ohio’s median family income of \$59,680. Based on 2015 U.S. Department of Housing and Urban Development (HUD) data, the estimated median family income was \$56,900.⁴

The assessment area contains 73,072 households, of which 52,521 were designated as families. Low- and moderate-income families represent 14.5% and 17.3% of all families in this assessment area, respectively, with 7.2% of families below the poverty level compared to 10.3% of all families below the poverty level within Ohio. According to data from the Economic Research Service of the United States Department of Agriculture (USDA),⁵ 2014 poverty rates for the counties in this assessment area were as follows:

County	2010 Poverty Rate	2014 Poverty Rate	Change
Auglaize	9.4%	8.3%	-11.7%
Darke	12.1%	12.2%	0.8%
Mercer	9.6%	8.9%	-7.3%
Shelby	12.2%	10.7%	-12.3%
Ohio	15.8%	15.8%	0.0%
United States	15.3%	15.5%	1.3%

As illustrated in the table above, 2014 poverty rates in all counties were below the rates for Ohio and the U.S. In addition, all but one county experienced a decrease in poverty rates from 2010 to 2014.

Labor, Employment and Economic Characteristics

The following table illustrates the percentage of land use in each county in the assessment area:⁶

County	Urban	Cropland	Pasture	Forest	Open Water	Bare Mines	Wetlands
Auglaize	7.20%	73.27%	7.69%	9.69%	1.32%	0.04%	0.79%
Darke	2.16%	83.14%	4.49%	9.58%	0.08%	0.00%	0.54%
Mercer	3.96%	75.86%	9.10%	6.95%	3.51%	0.04%	0.58%
Shelby	3.40%	73.31%	7.94%	14.49%	0.42%	0.07%	0.37%

As indicated above, a substantial portion of land usage in all counties in the assessment area is cropland, pasture, and forest, which could impact Minster’s ability to originate all types of loans within this assessment area.

The following table shows the five primary employment sectors by the largest industries by average employment and major employers for each of the counties in the assessment area.⁶

4 <http://www.huduser.gov/portal/datasets/il.html>

5 <http://www.ers.usda.gov/data-products/county-level-data-sets/poverty.aspx>

6 http://www.development.ohio.gov/reports/reports_countytrends_map.htm

County	Primary Employment Sectors	Major Employers
Auglaize	Manufacturing; Trade, Transportation and Utilities; Education and Health Services; Local Government; Leisure and Hospitality	American Trim; Crown Equipment Corp; Danone Group/Dannon Co.; Grand Lake Health System; Hitachi Metals/AAP St. Mary's Corp; Minster Machine Co.; Setex Inc.; St. Mary's City Schools; Veyance Technologies Inc.; Wapakoneta City Schools
Darke	Manufacturing; Trade, Transportation and Utilities; Education and Health Services; Local Government; Leisure and Hospitality	Brethren Retirement Community; Dick Lavy Trucking; FRAM Group Operations LLC; Greenville City Schools; Midmark Corp; Moriroku Co/Greenville Technology; Wal-Mart Stores Inc.; Wayne HealthCare; Whirlpool Corp/KitchenAid
Mercer	Manufacturing; Trade, Transportation and Utilities; Local Government; Education and Health Services; Leisure and Hospitality	Awardcraft; Celina Aluminum Precision Technology; Celina City Schools; Cooper Farms Inc.; Crown Equipment Corp; Fort Recovery Industries Inc.; J & M Manufacturing Co.; Mercer Health; Pax Machine Works; Reynolds & Reynolds Co.; WorkflowOne
Shelby	Manufacturing; Trade, Transportation and Utilities; Professional and Business Services; Local Government; Education and Health Services	Emerson Climate Technologies; Freshway Foods; Honda Motor Co. Ltd; Nippon Konpo Unyu/NK Parts Inds; Plastipak Packaging Inc.; Shelby County Government; Sidney City Schools; Superior Metal Products/Am Trim; Thor Industries/Airstream; Wal-Mart Stores Inc.; Wilson Memorial Hospital

The following table shows the 2014 and 2015 average annual unemployment rate for counties in the assessment area and reflects a decreasing trend over the two-year period.

**Unemployment Rates
Minster Bank: Non Metro OH**

Area	Years - Annualized	
	2014	2015
Auglaize Co.	3.7*	3.6*
Darke Co.	4.5*	4.0*
Mercer Co.	3.1*	3.1*
Shelby Co.	4.3*	4.1*
Ohio	4.9 (D)	4.6 (D)
National	5.4	4.8

Not Seasonally Adjusted

D: Reflects revised population controls and model reestimation.

* Data were subject to revisions on April 15, 2016

Data was extracted on May 5, 2016

Housing Characteristics

There are 79,645 housing units in this assessment area, based on the 2010 U.S. Census. Within this assessment area, 71.5% of the units are owner-occupied, 20.3% were rental units, and 8.3% were vacant. From an income perspective, 46.7% of all owner-occupied housing units and 41.3% of all rental units were located in moderate-income tracts. The high percentage of rental units could suggest limited opportunity for mortgage credit in this geography. Further, the owner-occupancy rate for all counties in the assessment area was well above Ohio's rate of 61.7%.

The median age of the housing stock is 47, according to the 2010 U.S. Census, with 34.5% of the housing units built prior to 1950. The age of the housing stock is slightly older than the statewide median age of 44 years and indicates there could be opportunity for home improvement lending.

The median housing value in the assessment area is \$121,747, with an affordability ratio of 39.7%. The higher the affordability ratio, the more affordable a home is considered. The housing affordability ratio is calculated by dividing the median family income by the median housing value. The housing stock in the assessment area is slightly more affordable than in Ohio at 34.7%. Further, based on the 2010 median family income for the MSA at \$57,508, approximately 39.4% of the homes valued up to \$105,400 in the assessment area would be considered affordable for low-income individuals and 71.4% of the homes valued up to \$168,640 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed-rate, 30-year loan.

According to RealtyTrac,⁷ all counties in the assessment area had lower ratios of properties in foreclosure than Ohio. The table below depicts homes that were in foreclosure in March 2016 for all counties in the assessment area, Ohio, and the nation.

Geography Name	Ratio of Properties Receiving Foreclosure Filings in (March, 2016)
Auglaize	1:1,147
Darke	1:1,206
Mercer	1:4,311
Shelby	1:1,003
Ohio	1:884
United States	1:1,212

According to Sperling's Best Places,⁸ the following table depicts the median home cost, housing appreciation in the prior year, and cost of living for the counties in Minster's assessment area. The cost of living in all counties within the assessment area is similar to the cost of living for Ohio at 88.2%.

County	Median Home Cost	Housing Appreciation	Cost of Living
Auglaize	\$106,600	-0.8%	86.2%
Darke	\$107,900	-0.7%	87.5%
Mercer	\$122,100	-0.7%	90.6%
Shelby	\$121,400	-0.8%	89.6%
Ohio	\$112,400	0.5%	88.2%

⁷ www.realtytrac.com

⁸ <http://bestplaces.net>

The median gross rent in the assessment area was \$621, which was lower than Ohio's median gross rent of \$678. According to the 2010 U.S. Census data, 20.3% of all housing units in the assessment area are rental units and 8.3% of rent costs in the assessment area were under \$350 a month. Further, 32.9% of rent costs were between \$500 to \$699 per month and 33.4% were over \$700. Additionally, 41.2% of renters have rent costs greater than 30.0% of their income.

The following table illustrates the demographics of the assessment area.

Combined Demographics Report

Assessment Area(s): Non Metro 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	7,607	14.5
Moderate-income	3	7.1	3,517	6.7	592	16.8	9,085	17.3
Middle-income	27	64.3	33,911	64.6	2,514	7.4	12,401	23.6
Upper-income	12	28.6	15,093	28.7	661	4.4	23,428	44.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	42	100.0	52,521	100.0	3,767	7.2	52,521	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	6,221	2,908	5.1	46.7	2,570	41.3	743	11.9
Middle-income	51,519	37,232	65.4	72.3	10,380	20.1	3,907	7.6
Upper-income	21,905	16,803	29.5	76.7	3,179	14.5	1,923	8.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	79,645	56,943	100.0	71.5	16,129	20.3	6,573	8.3
	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
Moderate-income	611	7.5	545	7.3	62	9.6	4	3.7
Middle-income	5,407	66	4,954	66.6	385	59.4	68	63
Upper-income	2,172	26.5	1,935	26	201	31	36	33.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	8,190	100.0	7,434	100.0	648	100.0	108	100.0
Percentage of Total Businesses:				90.8		7.9		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	3	0.2	3	0.2	0	0	0	0
Middle-income	1,065	62.6	1,059	62.6	6	60	0	0
Upper-income	633	37.2	629	37.2	4	40	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,701	100.0	1,691	100.0	10	100.0	0	.0
Percentage of Total Farms:				99.4		.6		.0

2015 FFIEC Census Data and 2015 D&B Information

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
NONMETROPOLITAN OHIO**

Lending performance in Nonmetropolitan Ohio is considered to be reasonable. Both the geographic and borrower distribution of lending is reasonable.

Equal weight was given to small business and HMDA lending (home purchase and refinance), followed by home equity and motor vehicle loans. There were not enough home improvement or small farm loans to conduct a meaningful analysis.

Details of Minster’s small business and HMDA lending can be found in the tables in Appendix B.

Geographic Distribution of Lending

Minster’s geographic distribution of lending is reasonable and there were no significant gaps in lending. The following table depicts the total loans originated by each tract income level and the number and percentages of census tracts with no lending activity.

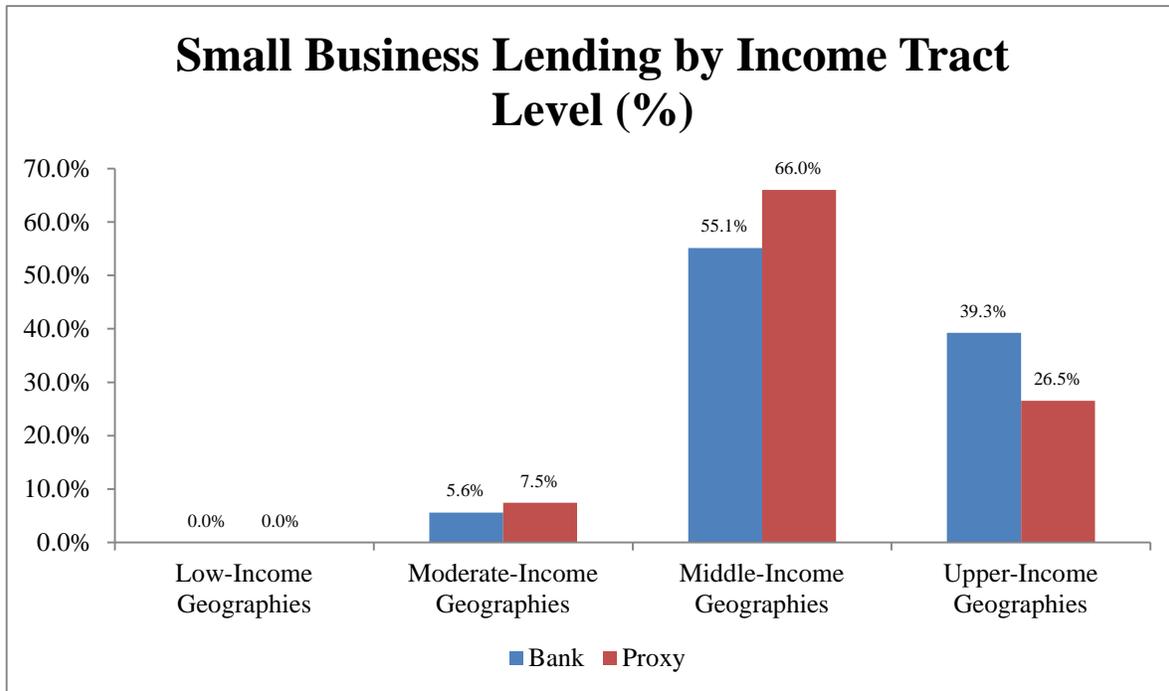
Total Loan Types Originated in Assessment Area by Tract Income Level					
Geographies	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Total
# (%) of Tracts in Assessment Area	0	3 (7.1%)	27 (64.3%)	12 (28.6%)	42
# (%) of Total Originated Loans	0	19 (4.3%)	179 (40.7%)	242 (55.0%)	440
# (%) of Tracts with Lending	0	2 (67.0%)	17 (63.0%)	12 (100%)	31 (73.8%)
# (%) of Tracts without Lending	0	1 (33.0%)	10 (37.0%)	0	11 (26.2%)

The table indicates that Minster is penetrating the upper-income tracts at higher rate and penetration in moderate- and middle-income tracts is comparable. As previously mentioned, there are no low-income tracts in the assessment area. The majority of Minster’s branches are located in upper-income tracts. Considering that Minster holds 8.2% of the market share in the area, combined with banking competition, it may be more difficult to extend loans, especially in those census tracts that are furthest away from Minster’s branch locations.

Small Business Lending

Minster originated 107 small business loans in the assessment area during the review period. Of the 107 loans, six were made in moderate-income census tracts, 59 were made in middle-income census tracts and 42 were made in upper-income census tracts. Minster’s performance was compared to the number of businesses within the assessment area (proxy).

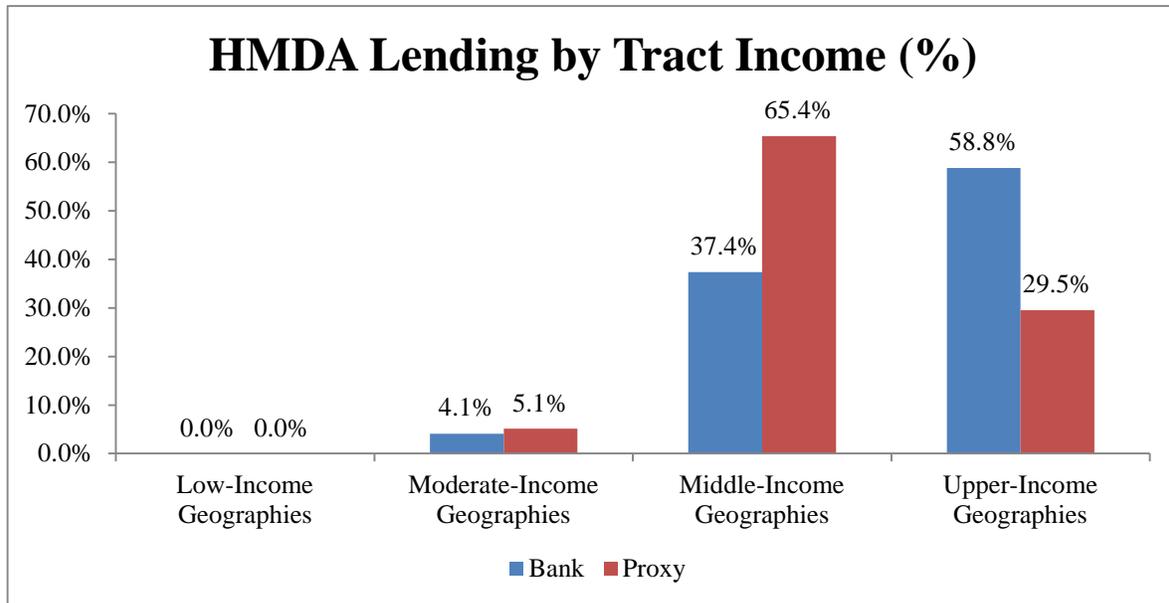
As shown in the graph below, Minster’s lending performance was just below the proxy for moderate- and middle-income tracts, and above proxy in the upper-income tracts. The geographic distribution of small business lending is good.



HMDA Lending

Minster originated 171 HMDA loans (98 home purchases and 73 refinances) in the assessment area during the review period. Of the 171 loans, seven were made in moderate-income census tracts, 64 were made in middle-income census tracts and 100 were made in upper-income census tracts. Minster’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy).

As shown in the following graph, Minster performed just below proxy in moderate-income tracts, significantly below proxy in middle-income tracts and significantly above proxy in upper-income tracts. The lack of available housing in moderate-income tracts due to a high percentage of rental and vacant units (41.3% and 11.9%, respectively) and the percentage of families below the poverty level living in moderate- and middle-income tracts (15.7% and 66.6%, respectively) may contribute to minimal lending in these areas. Minster’s geographic distribution for HMDA lending is considered good.

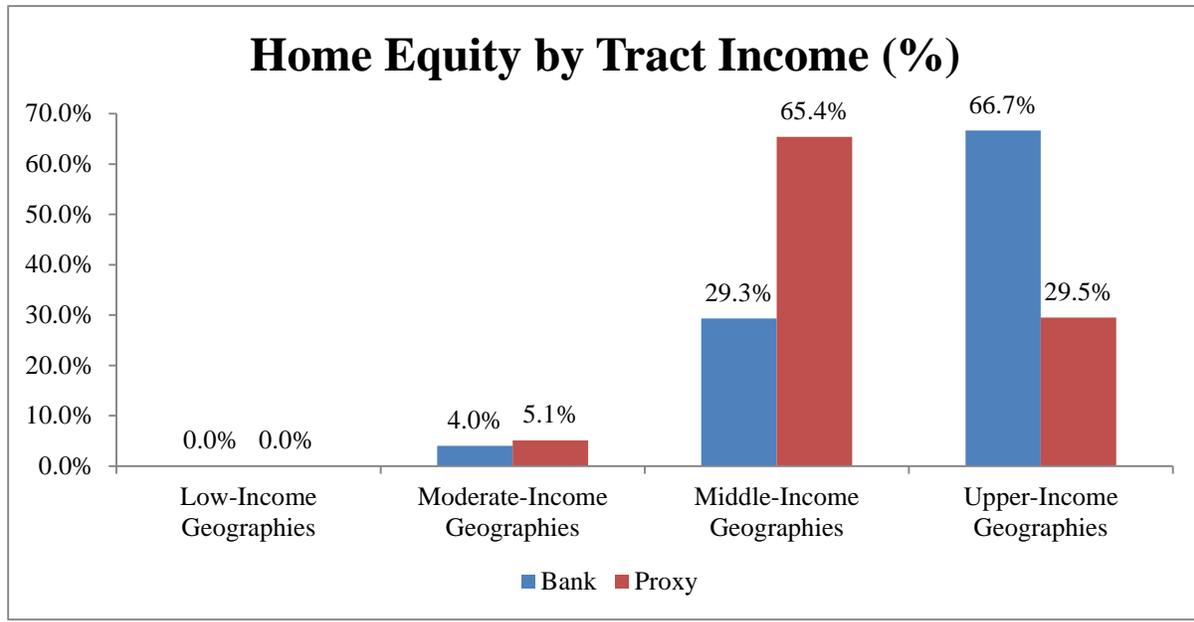


Consumer Lending

Minster originated a total of 153 consumer loans in the assessment area during the evaluation period, which is comprised of 75 (49.0%) home equity and 78 (51.0%) motor vehicle loans. Of the 153 loans, three were made in moderate-income census tracts, 53 were made in middle-income census tracts, and 97 were made in upper-income census tracts. Minster’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy) for home equity loans and the number of households in the assessment area for motor vehicle loans. Overall, the geographic distribution of consumer lending is considered good.

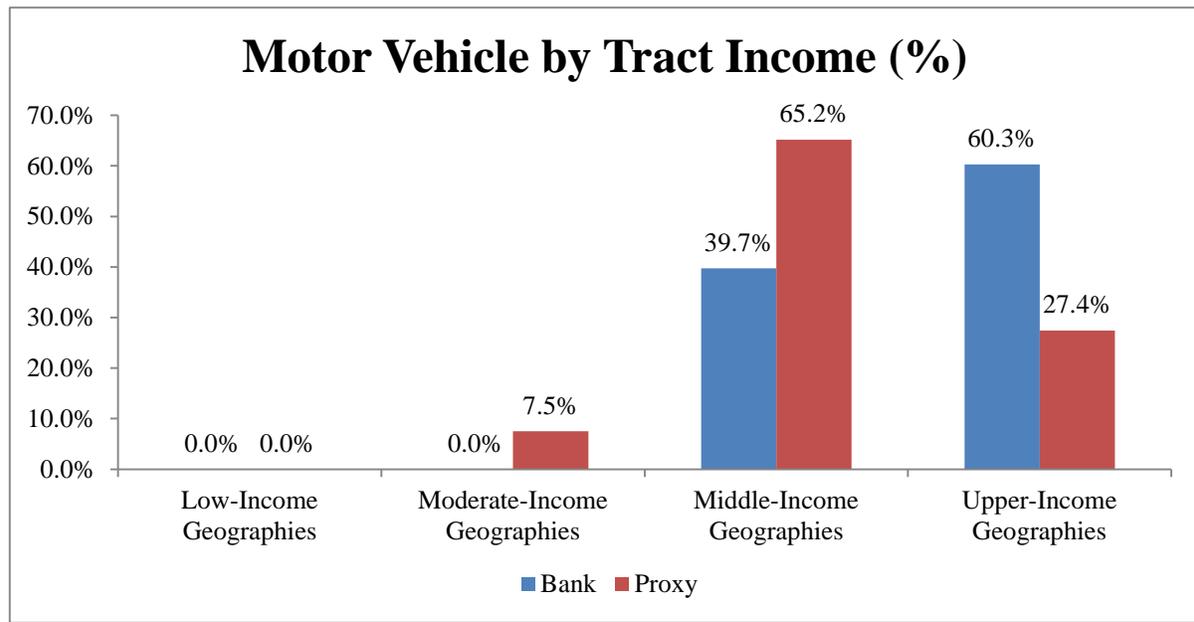
Home Equity Lending

As shown in the following graph, Minster performed just below proxy in moderate-income tracts, significantly below in middle-income tracts, and significantly above in upper-income tracts. The lack of available housing in moderate-income tracts due to a high percentage of rental and vacant units (41.3% and 11.9%, respectively) and the percentage of families below the poverty level living in moderate- and middle-income tracts (15.7% and 66.6%, respectively) may contribute to minimal lending in these areas. Minster’s geographic distribution for home equity lending is considered good.



Motor Vehicle Lending

As shown in the graph below, Minster performed significantly below proxy in moderate- and middle-income tracts and significantly above proxy in upper-income tracts. The percent of households below poverty in moderate-income tracts at 16.4% and 65.1% in upper-income tracts could limit consumer lending in these areas. Minster’s geographic distribution for motor vehicle lending is considered adequate.

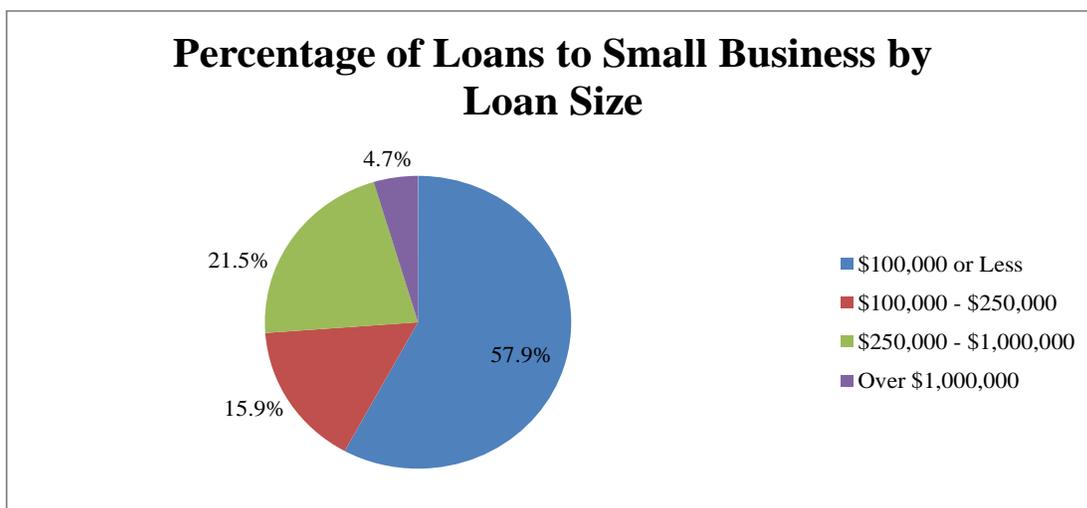
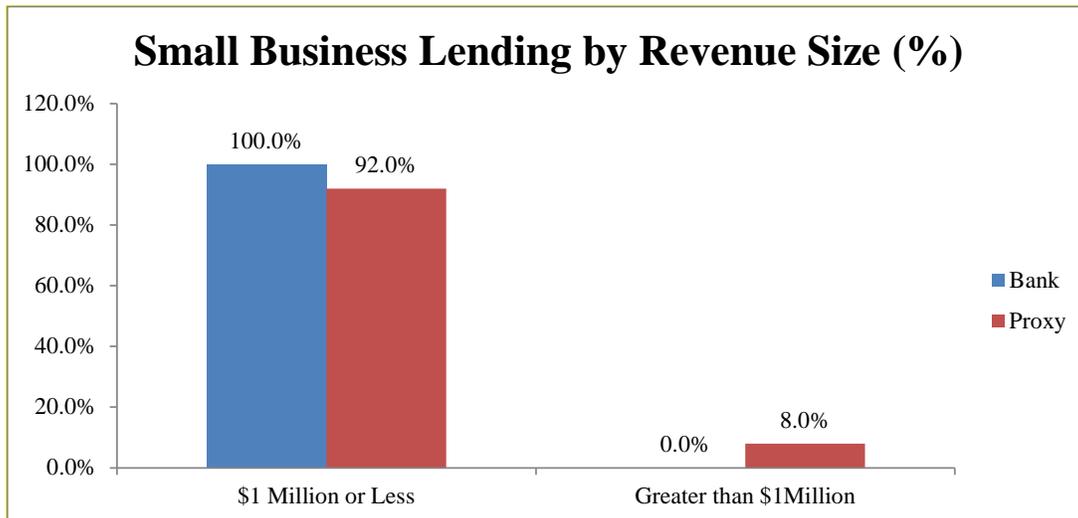


Borrower Distribution of Lending

The distribution of loans is considered reasonable based on borrower income and for businesses of different revenue sizes. Most businesses within the assessment area have annualized revenues less than \$1 million.

Small Business Lending

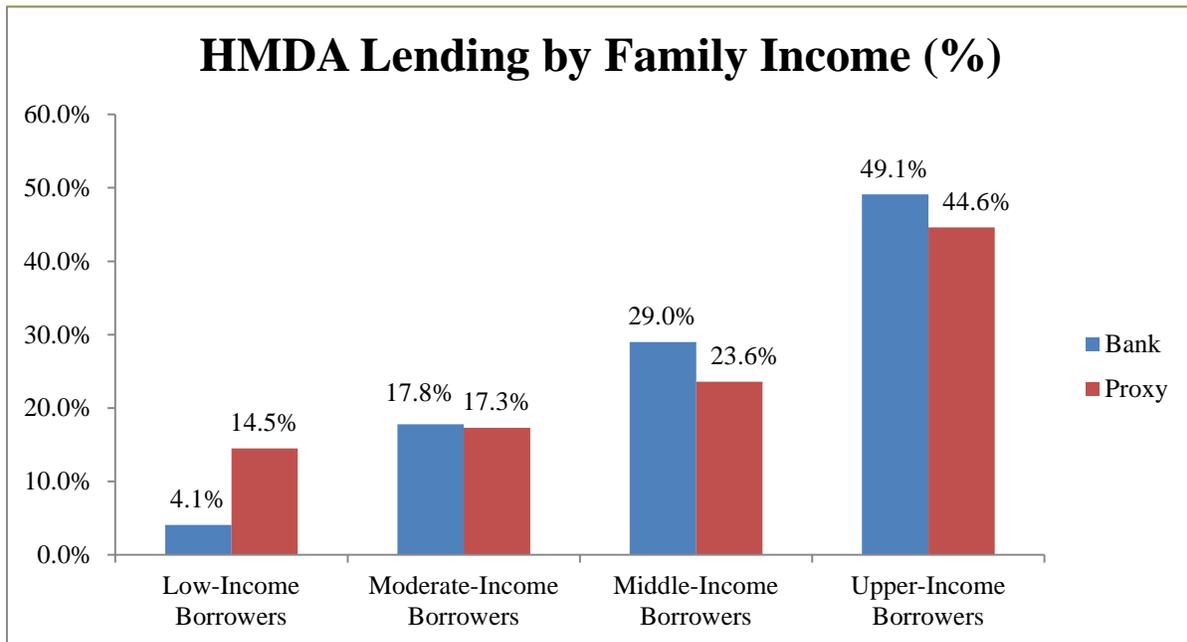
Minster originated 74 small businesses loans in the assessment area for which business revenues were reported. All 74 loans (100.0%) were to small businesses with revenues of \$1 million or less. The following graph depicts Minster’s small business lending. Loan amount and revenue were considered, as smaller loans are generally commensurate with the borrower needs of smaller businesses. Of the 107 total small business loans originated within the assessment area, 57.9% of the loans were for loan amounts of \$100,000 or less. The following graph depicts Minster’s small business lending. Overall, the distribution of loans based on the revenue size for small business lending is considered excellent.



HMDA Lending

Minster originated 169 HMDA loans (97 home purchases and 72 refinances) in the assessment area during the review period where income was reported. Of the 169 loans, seven were made to low-income borrowers, 30 were made to moderate-income borrowers, 49 were made to middle-income borrowers and 83 were made to upper-income borrowers. Minster’s performance was compared to the number of families by family income in the assessment area (proxy).

As shown in the following graph, Minster performed significantly below proxy for lending to low-income borrowers and above proxy for moderate-, middle-, and upper-income borrowers. While lending to low-income borrowers is below the percentage of low-income families in the assessment area, it should be noted that only 39.2% of homes in the assessment area would be affordable for low-income borrowers. Additionally, 7.2% of families in the assessment area are below the poverty level and rental and vacant units make up 28.5% of housing in the assessment area, which could make it difficult to originate HMDA loans. Overall, residential lending to borrowers of different income levels is considered good.

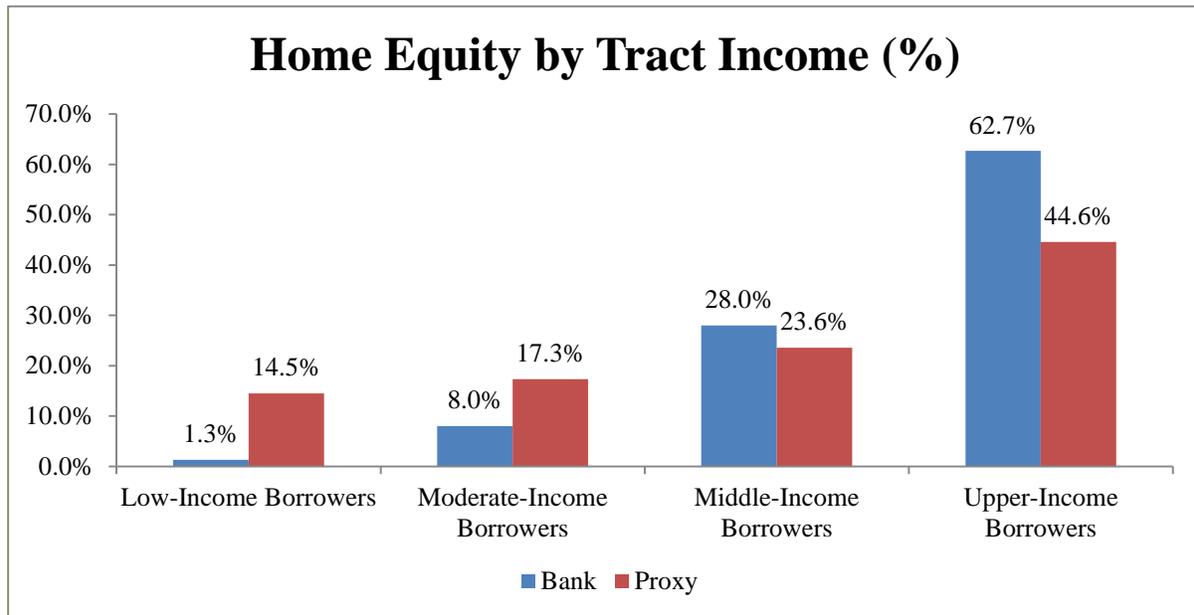


Consumer Lending

There were a total of 153 consumer loans. Of the 153, 18 were to low-, 26 were to moderate-, 40 were to middle-, and 69 were to upper-income borrowers. Overall, Minster’s borrower distribution of consumer lending to borrowers of different income levels is considered good.

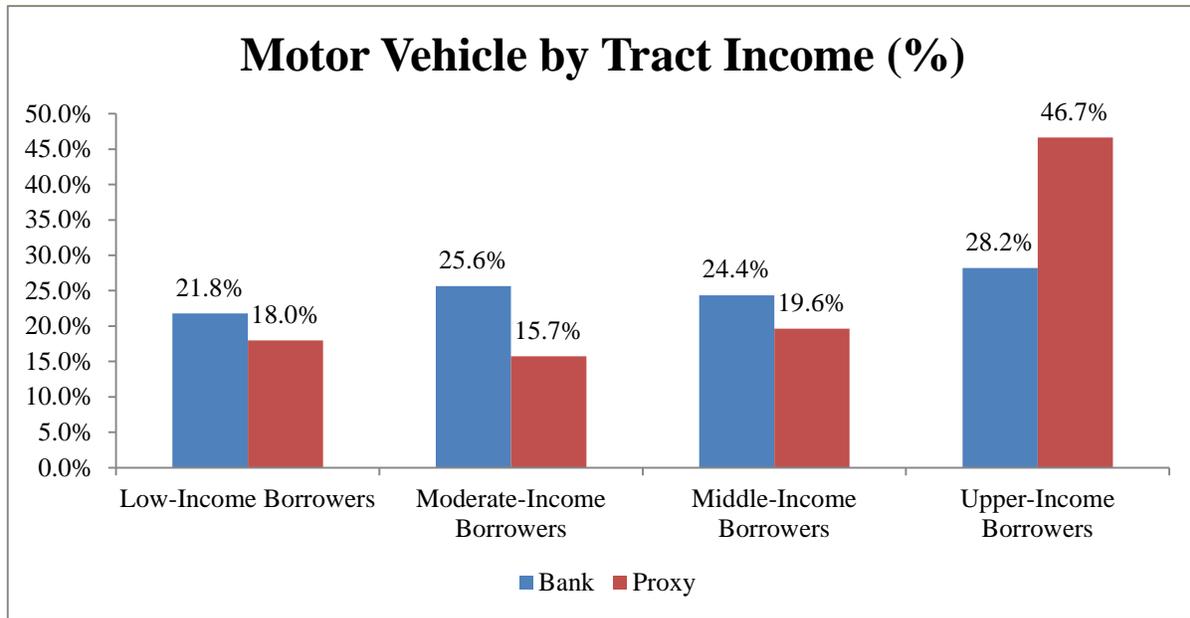
Home Equity Lending

As shown in the following graph, Minster performed significantly below proxy for lending to low- and moderate-income borrowers and above proxy for middle- and upper-income borrowers. While lending to low-income borrowers is below the percentage of low-income families in the assessment area, it should be noted that only 39.2% of homes in the assessment area would be affordable for low-income borrowers. Additionally, 7.2% of families in the assessment area are below the poverty level and rental and vacant units make up 28.5% of housing in the assessment area, which could make it difficult to originate home equity loans. Overall, home equity lending to borrowers of different income levels is considered adequate.



Motor Vehicle Lending

As shown in the following graph, Minster performed above proxy for lending to borrowers of all income levels. Overall, motor vehicle lending is considered excellent.



Community Development Test

Minster is rated “Satisfactory” under the community development test. Minster’s community development performance demonstrates an adequate responsiveness to the community development needs of its assessment area through community development lending, qualified investments, and community development services, as appropriate, considering its capacity and the need and availability of such opportunities in the assessment area.

Community Development Loans

Minster demonstrated an adequate responsiveness to the community development needs of the assessment area through community development loans. Minster originated one community development loan benefiting the assessment area during the evaluation period totaling \$600,000 that supported community services.

Community Development Investments

Minster demonstrated an adequate responsiveness to community development investment needs for this assessment area. During the evaluation period, Minster made donations to 16 organizations totaling \$34,714 that supported a variety of activities, including affordable housing, economy development, and community services to low- and moderate-income individuals.

Community Development Services

Minster demonstrated an adequate responsiveness to community development services. Minster is an active participant in the America Saves Program, a non-profit organization that seeks to provide support, motivate, and encourage low- to moderate-income households to save money, reduce debt, and build wealth. Minster promotes a first-time saver program associated with America Saves and opened 219 accounts during the examination period. The program offers a savings account with a very low or no-minimum balance and minimal or no fees.

**DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE
DAYTON, OH METROPOLITAN STATISTICAL AREA #19380
(Full-scope Review)**

Minster’s metropolitan assessment area encompasses the entirety of Miami and Montgomery counties, which are part of the Dayton MSA in West Central Ohio. This assessment area consists of a total of 174 census tracts, of which 20 are low-income tracts (11.5%), 44 are moderate-income census tracts (25.3%), 77 are middle-income tracts (44.3%), and 32 are upper-income tracts (18.4%). There is one tract with unknown income and none of the middle-income tracts are designated as distressed or underserved. Within this assessment area, Minster operates one branch office in Miami County and one loan production office (LPO) office in Montgomery County.

According to the June 30, 2015 FDIC Deposit Market Share Report,⁹ Minster ranked 18th out of 24 institutions in the market with a deposit share of 0.4%. The largest institutions by deposit share include the following national banks: Fifth Third Bank (29.2%); JPMorgan Chase Bank, National Association (18.5%); PNC Bank, National Association (15.2%); Key Bank National Association (8.5%); US Bank National Association (6.1%); and The Huntington National Bank (5.0%).

#	Financial Institution	Deposit Market Share
1	Fifth Third Bank	29.16%
2	JPMorgan Chase Bank, National Association	18.51%
3	PNC Bank, National Association	15.16%
4	KeyBank National Association	8.48%
5	US Bank National Association	6.11%
6	The Huntington National Bank	4.97%
7	Union Savings Bank	4.07%
8	First Financial Bank, National Association	2.96%
9	The Park National Bank	1.86%
10	MainSource Bank	1.56%
11	LCNB National Bank	1.45%
12	Farmers & Merchants Bank	1.13%
13	Civista Bank	0.92%
14	Monroe Federal Savings and Loans Association	0.85%
15	The Covington Savings and Loan Association	0.61%
16	The First National Bank of Germantown	0.47%
17	Mutual Federal Savings Bank	0.39%
18	Minster Bank	0.37%

⁹ <http://www2.fdic.gov/sod/sodMarketBank.asp>

One community contact interview was conducted in this assessment area. The contact was an organization that provides various community services, including, but not limited to, housing and financial counseling, home repair and weatherization, a youth empowerment center, workforce innovation, financial education, and tax assistance. The contact stated poverty is present in both the suburbs and the inner city and that economic conditions are beginning to stabilize in the area as new companies are re-locating here. According to the contact, banks participate in activities related to financial literacy training, although additional work could be done with reaching the unbanked people throughout the area.

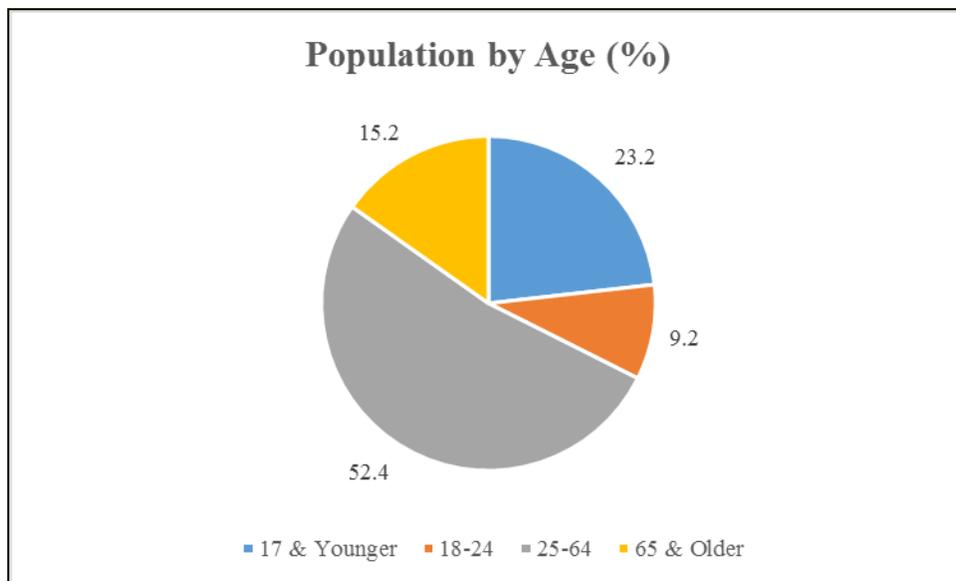
Population Characteristics

According to the 2010 U.S. Census Bureau Report, the total population in the assessment area was 637,659. The following table shows the 2010 and 2014 population of the two counties within Minster’s assessment area, as well as the estimated population change. Miami County experienced a slight increase in population, while Montgomery was relatively stable from 2010 to 2014.¹⁰

County	2010 Population	2014 Population	Population Percent Change
Miami	102,506	103,900	1.4%
Montgomery	535,153	533,116	-0.4%
Total	637,659	637,016	

Approximately, 8.9% of the assessment area’s population resides in low-income tracts, 22.5% in moderate-income tracts, 46.7% in middle-income tracts, and 21.9% reside in upper-income tracts.

Based on 2010 U.S. Census Bureau data, the population by age is distributed as follows:



¹⁰ American Fact Finder; <http://factfinder2.census.gov>

Approximately 23.2% of the population is under 18, while approximately 76.8% of the population is 18 years of age or older, which is the legal age to enter into a contract, and the prime ages when individuals are generally in need of loans.

Income Characteristics

According to 2010 U.S. Census Data, the median family income for the assessment area was \$57,378 compared to Ohio’s median family income of \$59,680. Based on 2015 U.S. Department of Housing and Urban Development (HUD) data, the estimated median family income was \$62,100.¹¹

The assessment area contains 264,747 households, of which 166,696 were designated as families. Low- and moderate-income families represent 22.5% and 18.7% of all families in this assessment area, respectively, with 10.9% of families below the poverty level compared to 10.3% of all families below the poverty level within Ohio. According to data from the Economic Research Service of the United States Department of Agriculture (USDA),¹² 2014 poverty rates for the counties in this assessment area were as follows:

County	2010 Poverty Rate	2014 Poverty Rate	Change
Miami	10.1%	10.6%	5.0%
Montgomery	18.8%	19.7%	4.8%
Ohio	15.8%	15.8%	0.0%
United States	15.3%	15.5%	1.3%

As illustrated in the table above, the 2014 poverty rate in Miami was below both the state and the U.S., while the poverty rate in Montgomery was well above both the state and the U.S. Poverty rates in both counties. In addition, both counties experienced an increase in poverty rates from 2010 to 2014.

Labor, Employment and Economic Characteristics

The following table illustrates the percentage of land use in each county in the assessment area:¹³

County	Urban	Cropland	Pasture	Forest	Open Water	Bare Mines	Wetlands
Miami	13.14%	63.72%	3.39%	18.55%	0.52%	0.07%	0.61%
Montgomery	43.47%	32.56%	3.97%	18.30%	1.10%	0.25%	0.36%

As indicated above, a substantial percentage of Miami County is cropland, pasture, and forest, which may impact Minster’s ability to originate all types of loans in this assessment area. In addition, while 43.5% of Montgomery County is urban, Minster does not have a branch presence here and competition is high, with several major national banks operating in the area.

11 <http://www.huduser.gov/portal/datasets/il.html>

12 <http://www.ers.usda.gov/data-products/county-level-data-sets/poverty.aspx>

13 http://www.development.ohio.gov/reports/reports_countytrends_map.htm

The following table shows the five primary employment sectors by the largest industries by average employment and major employers for each of the counties in the assessment area.¹³

County	Primary Employment Sectors	Major Employers
Miami	Manufacturing; Trade, Transportation and Utilities; Local Government; Education and Health Services, Leisure and Hospitality	AO Smith/Regal Beloit Corp.; ConAgra Inc.; Crane Co.; F-Tech Inc./F&P America; Goodrich Corp.; Hartzell Illinois Tool Works Inc./Hobart; Meijer Inc.; Piqua City Schools; Troy City Schools; Upper Valley Medical Center
Montgomery	Education and Health Services; Trade, Transportation and Utilities; Professional and Business Services; Local Government; Manufacturing	AES Corp/Dayton Power & Light Behr Dayton Thermal Products LLC; Dayton City Schools; DMAX Ltd.; GE Capital; Green Tokai Co.; Kettering Health Network; PNC Financial Services Group; Premier Health Partners Inc.; Reed Elsevier/LexisNexis; Reynolds & Reynolds Co Inc.; University of Dayton; US Federal Government

The following table shows the 2014 and 2015 average annual unemployment rate for counties in the assessment area and reflects a decreasing trend over the two-year period.

**Unemployment Rates
Minster Bank: Dayton OH MSA**

Area	Years - Annualized	
	2014	2015
Miami Co.	4.5*	4.2*
Montgomery Co.	5.1*	4.7*
Dayton, OH MSA	4.9*	4.5*
Ohio	4.9 (D)	4.6 (D)
National	5.4	4.8

Not Seasonally Adjusted

D: Reflects revised population controls and model reestimation.

* Data were subject to revisions on April 15, 2016

Data was extracted on May 5, 2016

Housing Characteristics

There are 298,641 housing units in this assessment area, based on the 2010 U.S. Census. Within this assessment area, 58.1% of the units are owner-occupied, 31.0% were rental units, and 11.4% were vacant. From an income perspective, 30.9% and 46.3% of all owner-occupied housing units were located in low- and moderate-income tracts, respectively. In addition, 43.1% and 39.3% of all rental units were located in low- and moderate-income tracts. The high percentage of rental units could suggest limited opportunity for mortgage credit in these areas. Further, the owner-occupancy rate for Miami County (58.1%) was below Ohio’s rate of 61.7%, while the rate for Montgomery County (66.9%) was above Ohio’s rate.

The median age of housing stock is 47, according to the 2010 U.S. Census, with 26.1% of the housing units built prior to 1950. The age of the housing stock is slightly older than the statewide median age of 44 years and indicates there could be opportunity for home improvement lending.

The median housing value in the assessment area is \$122,010, with an affordability ratio of 37.0%. The higher the affordability ratio, the more affordable a home is considered. The housing affordability ratio is calculated by dividing the median family income by the median housing value. The housing stock in the Dayton MSA is slightly more affordable than in Ohio at 34.7%. Further, based on the 2010 median family income for the MSA, \$57,378 or approximately 39.2% of the homes valued up to \$105,162 in the assessment area would be considered affordable for low-income individuals and 71.4% of the homes valued up to \$168,259 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed-rate, 30-year loan.

According to RealtyTrac,¹⁴ all counties in the assessment area had lower ratios of properties in foreclosure than Ohio. The table below depicts homes that were in foreclosure in March 2016 for all counties in the assessment area, Ohio, and the nation.

Geography Name	Ratio of Properties Receiving Foreclosure Filings in (March 2016)
Miami	1:786
Montgomery	1:594
Ohio	1:884
United States	1:1,212

According to Sperling’s Best Places,¹⁵ the following table depicts the median home cost, housing appreciation in the prior year, and cost of living for both counties in Minster’s assessment area. The cost of living in Miami and Montgomery counties is similar to the cost of living for Ohio at 88.2%.

County	Median Home Cost	Housing Appreciation	Cost of Living
Miami	\$112,700	-1.6%	86.2%
Montgomery	\$80,500	-1.6%	87.5%
Ohio	\$112,400	0.5%	88.2%

The median gross rent in the Dayton MSA was \$683, which was slightly above Ohio’s rate of \$678. According to the 2010 U.S. Census data, 30.1% of all housing units in the assessment area are rental units and 8.1% of rent costs in the assessment area were under \$350 a month. Further, 29.5% of rent costs were between \$500 to \$699 per month and 45.1% were over \$700. Additionally, 47.6% of renters have rent costs greater than 30.0% of their income.

The following table illustrates the demographics of the assessment area.

14 www.realtytrac.com

15 <http://bestplaces.net>

Combined Demographics Report

Assessment Area(s): Dayton OHMSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	20	11.5	13,107	7.9	5,081	38.8	37,445	22.5	
Moderate-income	44	25.3	35,615	21.4	6,155	17.3	31,087	18.6	
Middle-income	77	44.3	79,298	47.6	5,523	7	34,877	20.9	
Upper-income	32	18.4	38,676	23.2	1,372	3.5	63,287	38	
Unknown-income	1	0.6	0	0	0	0	0	0	
Total Assessment Area	174	100.0	166,696	100.0	18,131	10.9	166,696	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	31,024	9,587	5.5	30.9	13,369	43.1	8,068	26	
Moderate-income	73,629	34,100	19.6	46.3	28,906	39.3	10,623	14.4	
Middle-income	135,838	85,631	49.3	63	38,283	28.2	11,924	8.8	
Upper-income	58,150	44,277	25.5	76.1	10,594	18.2	3,279	5.6	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	298,641	173,595	100.0	58.1	91,152	30.5	33,894	11.3	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	2,164	8.2	1,849	7.7	310	12.7	5	4	
Moderate-income	5,162	19.5	4,525	19	615	25.1	22	17.6	
Middle-income	12,591	47.6	11,470	48.1	1,041	42.6	80	64	
Upper-income	6,509	24.6	6,012	25.2	479	19.6	18	14.4	
Unknown-income	6	0	5	0	1	0	0	0	
Total Assessment Area	26,432	100.0	23,861	100.0	2,446	100.0	125	100.0	
Percentage of Total Businesses:				90.3		9.3		.5	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	7	1.2	7	1.3	0	0	0	0	
Moderate-income	35	6.2	35	6.3	0	0	0	0	
Middle-income	426	75.7	422	75.5	4	100	0	0	
Upper-income	95	16.9	95	17	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	563	100.0	559	100.0	4	100.0	0	.0	
Percentage of Total Farms:				99.3		.7		.0	

2015 FFIEC Census Data and 2015 D&B Information

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
DAYTON, OH METROPOLITAN STATISTICAL AREA #19380**

Lending Test

Lending performance in the Dayton MSA is considered to be reasonable. Both the geographic and borrower distribution of lending is reasonable.

Equal weight was given to small business and HMDA lending (home purchase and refinance). There were not enough home improvement or consumer loans to conduct a meaningful analysis. Details of Minster’s small business and HMDA lending can be found in the tables in Appendix B.

Geographic Distribution of Lending

Minster’s geographic distribution of lending is reasonable; however, significant lending gaps were noted within the assessment area. The following table depicts the total loans originated by each tract income level and the number and percentages of census tracts with no lending activity.

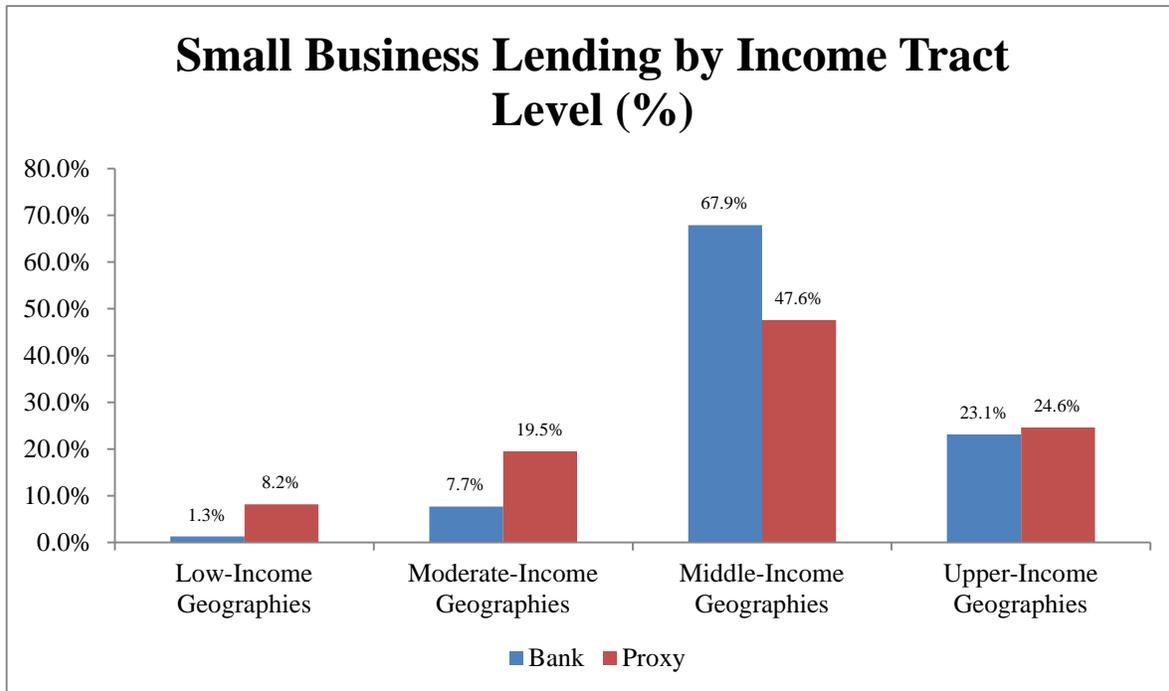
Total Loan Types Originated in Assessment Area by Tract Income Level						
Geographies	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown	Total
# (%) of Tracts in Assessment Area	20 (11.5%)	44 (25.3%)	77 (44.3%)	32 (18.4%)	1 (.5%)	174
# (%) of Total Originated Loans	2 (1.0%)	20 (10.4%)	128 (66.3%)	43 (22.3%)	0	193
# (%) of Tracts with Lending	2 (10%)	10 (22.7%)	29 (37.7%)	10 (31.2%)	0	51 (29.3%)
# (%) of Tracts without Lending	18 (90%)	34 (77.3%)	48 (62.3%)	22 (68.8%)	1 (100%)	123 (70.7%)

The table indicates that Minster is penetrating 29.3% of tracts in this assessment area. Minster has one branch which is located in a middle-income tract. Considering that Minster holds 0.4% of the market share in the area, combined with heavy banking competition, it may be more difficult to extend loans, especially in those census tracts that are furthest away from Minster’s branch location.

Small Business Lending

Minster originated 78 small business loans in the assessment area during the review period. Of the 78 loans, one was made in a low-income census tract, six were made in moderate-income census tracts, 53 were made in middle-income census tracts, and 18 were made in upper-income census tracts. Minster’s performance was compared to the number of businesses within the assessment area (proxy).

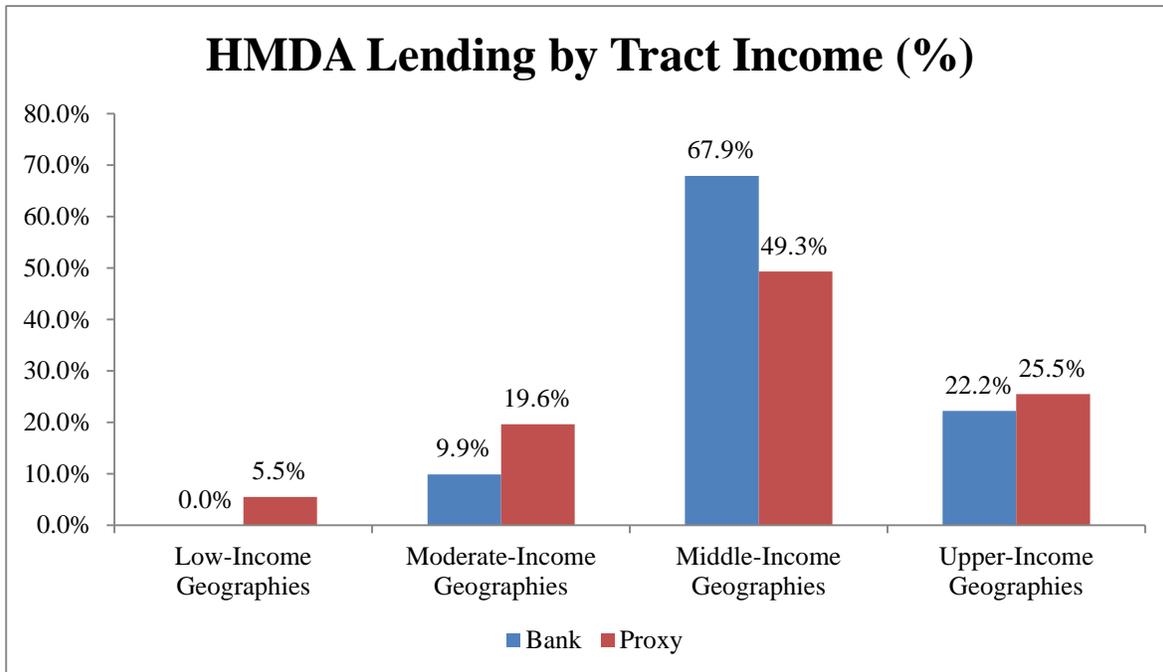
As shown in the graph below, Minster’s performance of lending was significantly less than proxy in the low- and moderate-income tracts and slightly lower than proxy in the upper-income tracts. Due to the limited branch presence and high competition in this assessment area, the geographic distribution of small business lending is adequate.



HMDA Lending

Minster originated 81 HMDA loans (53 home purchases and 28 refinances) in the assessment area during the review period. Of the 81 loans, no loans were made in low-income census tracts, eight were made in moderate-income census tracts, 55 were made in middle-income census tracts, and 18 were made in upper-income census tracts.

As shown in the following graph, Minster performed well below proxy in low- and moderate-income tracts, significantly above proxy in middle-income tracts, and just below proxy in upper-income tracts. The lack of available housing in moderate-income tracts due to rental and vacant units may contribute to minimal lending in these areas. Minster's geographic distribution for HMDA lending is considered adequate.

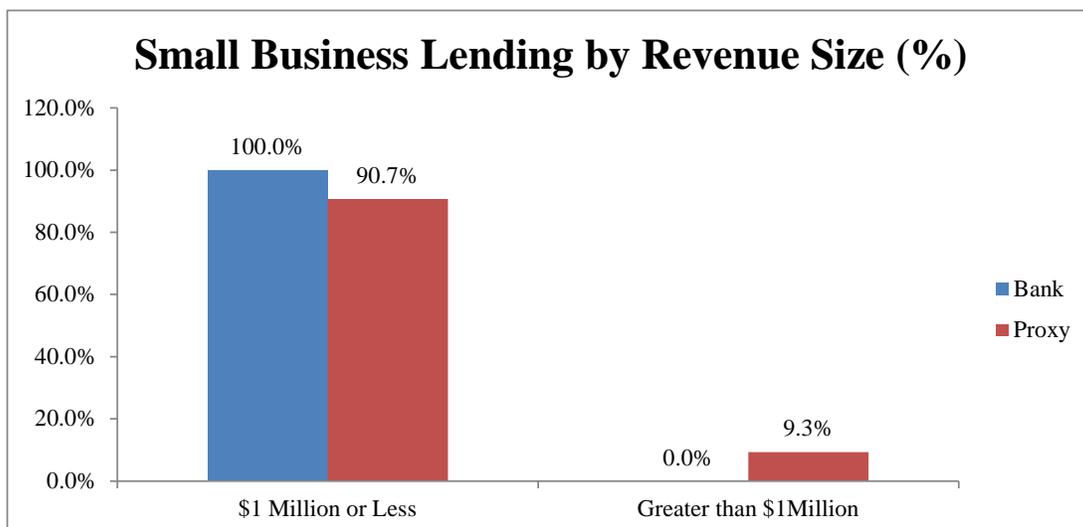


Borrower Distribution of Lending

The distribution of loans is considered reasonable based on borrower income and for businesses of different revenue sizes. Most businesses within Minster’s assessment area have annualized revenues less than \$1 million.

Small Business Lending

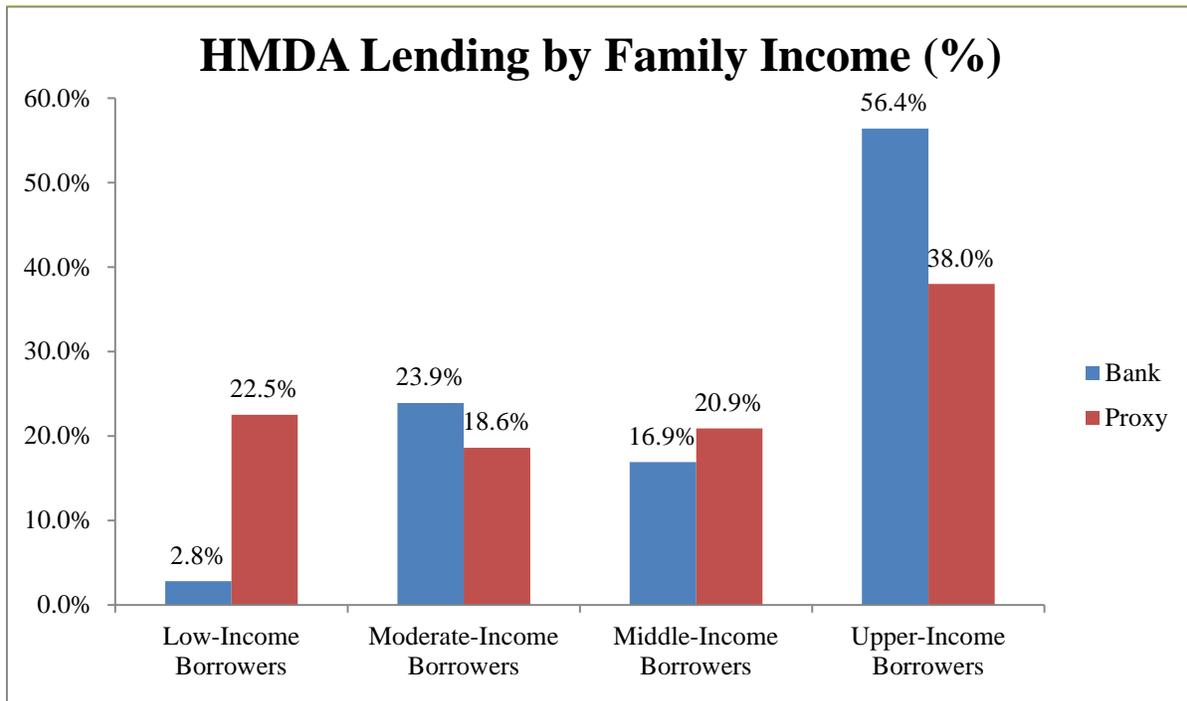
Minster originated 42 small businesses loans in the assessment area for which business revenues were reported. All 42 loans (100%) were to small businesses with revenues of \$1 million or less. The following graph depicts Minster’s small business lending. Overall, the distribution of loans based on the revenue size for small business lending is considered excellent.



HMDA Lending

Minster originated 71 HMDA loans (49 home purchases and 22 refinances) in the assessment area during the review period where income was reported. Of the 71 loans, two were made to low-income borrowers, 17 were made to moderate-income borrowers, 12 were made to middle-income borrowers, and 40 were made to upper-income borrowers. Minster’s performance was compared to the number of families by family income in the assessment area (proxy).

As shown in the following chart, Minster performed significantly below proxy for lending to low-income borrowers, well above proxy for lending to moderate-income borrowers, below proxy for middle-income borrowers, and significantly above proxy for upper-income borrowers. While lending to low-income borrowers is below the percentage of low-income families in the assessment area, it should be noted that only 39.2% of homes in the assessment area would be affordable for low-income borrowers. Additionally, there are 30.5% rental units and 11.4% vacant units in the assessment area, which limits Minster’s ability to make mortgage loans. Overall, residential lending to borrowers of different income levels is considered good.



Community Development Test

Minster is rated “Satisfactory” under the community development test. Minster’s community development performance demonstrates an adequate responsiveness to the community development needs of the assessment area through community development lending, qualified investments, and community development services as appropriate, considering its capacity and the need and availability of such opportunities in the assessment area.

Community Development Loans

Minster demonstrated an adequate responsiveness to the community development needs of the assessment area through community development loans. Minster originated two community development loans benefiting the assessment area during the evaluation period totaling \$1,965,000 that supported revitalization and community services to low- and moderate-income people.

Community Development Investments

Minster demonstrated an adequate responsiveness to community development investment needs for this assessment area. During the evaluation period, Minster made four new investments to two organizations totaling \$325,000.

Minster's investments were primarily in the form of bonds to support schools that serve low- and moderate-income students. In addition, Minster made qualified donations in the amount of \$6,228 to support four organizations that provide community services targeted to low- and moderate-income individuals.

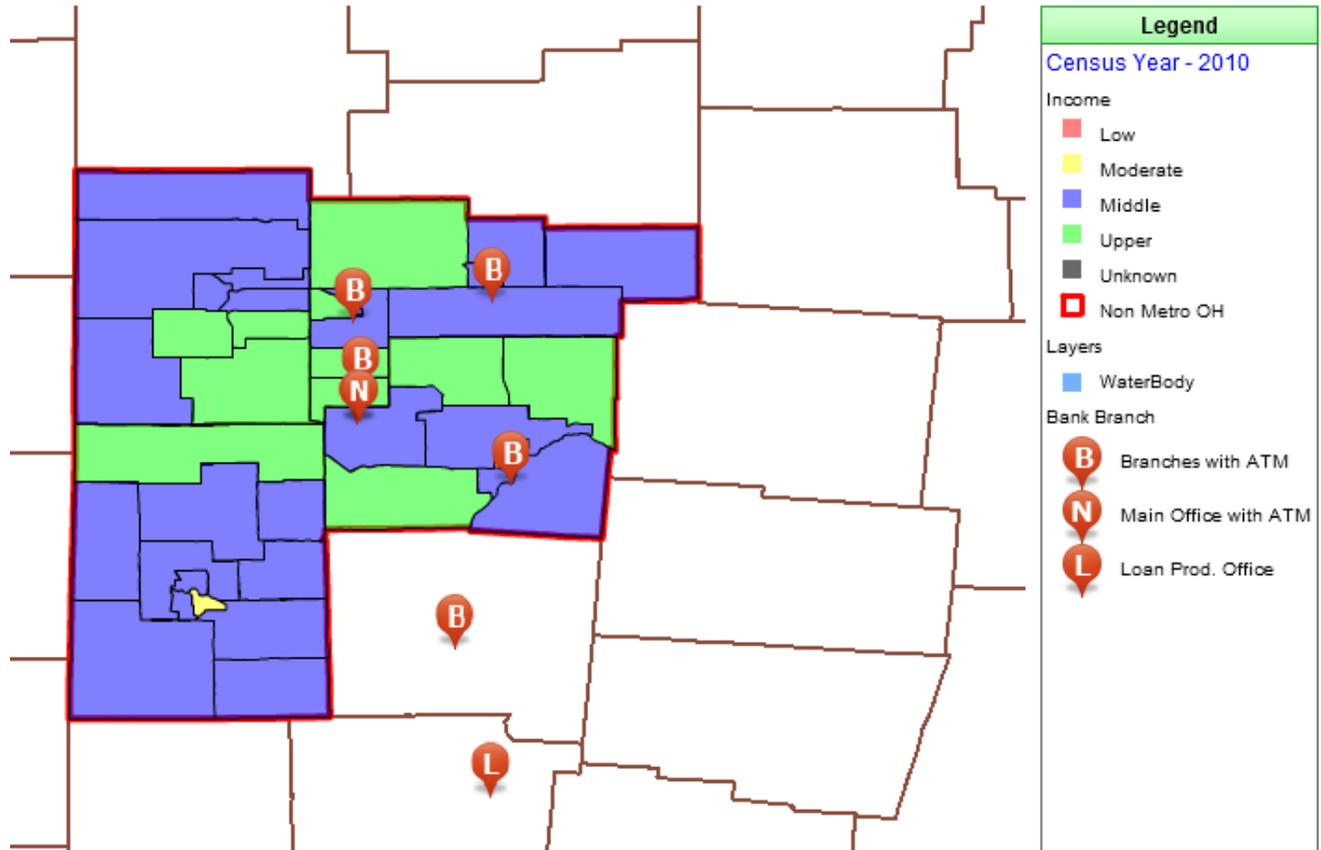
Community Development Services

Minster demonstrated an adequate responsiveness to community development services. Minster provided approximately 154 hours to the community, with three employees providing financial education to a local school serving low- and moderate-income students and four employees providing technical assistance through committee membership with an organization that provides community services to low- and moderate-income individuals. In addition, Minster has an arrangement with a local housing authority agency to accept payments from low- and moderate-income tenants.

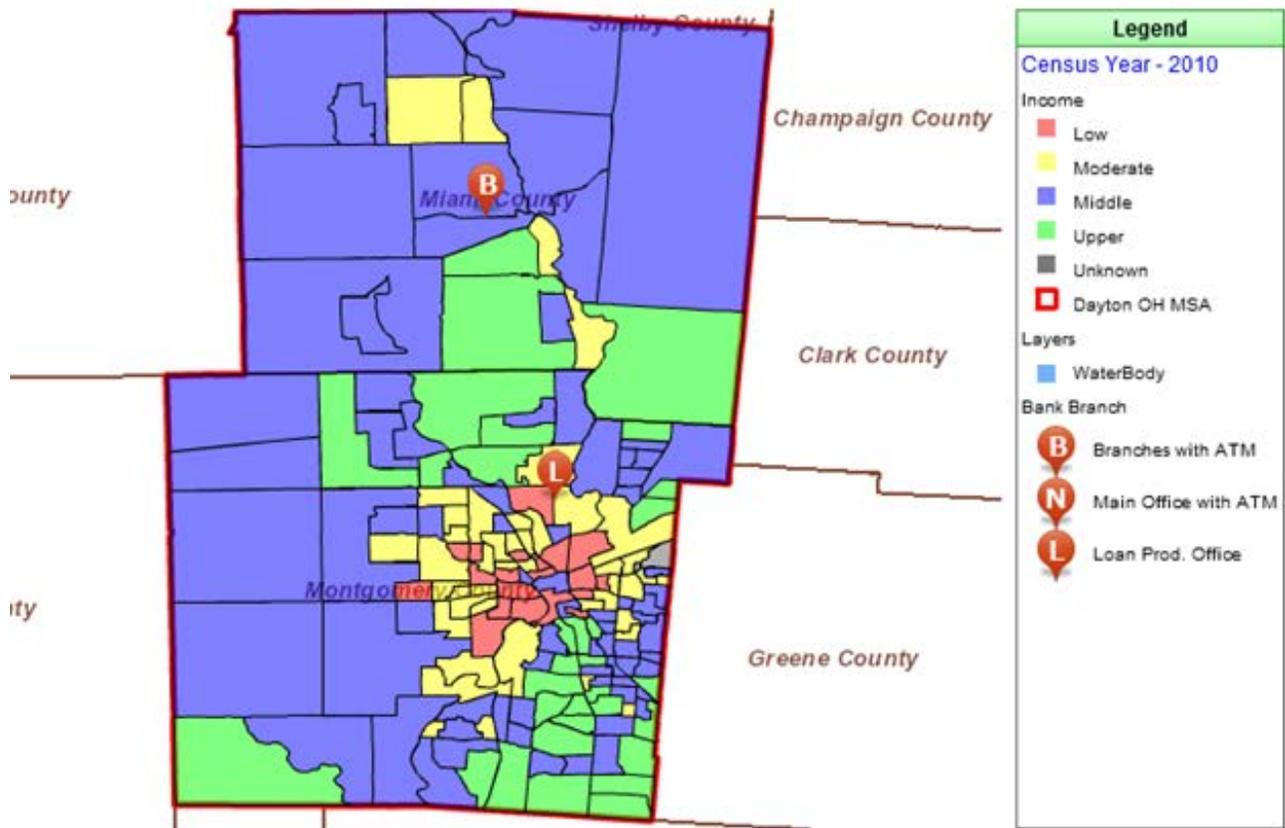
APPENDIX A

ASSESSMENT AREA MAPS

Nonmetropolitan Ohio



Dayton MSA 19380



APPENDIX B

LENDING TABLES

CRA Loan Distribution Table

Exam: Minster 2016

Assessment Area/Group: Non Metro OH

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	6	5.6%	413	1.3%	0	0.0%	0	0.0%
Low/Moderate Total	6	5.6%	413	1.3%	0	0.0%	0	0.0%
Middle	59	55.1%	21,211	69.1%	0	0.0%	0	0.0%
Upper	42	39.3%	9,092	29.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	107	100.0%	30,716	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or Less	74	69.2%	20,158	65.6%	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	33	30.8%	10,558	34.4%	0	0.0%	0	0.0%
Total	107	100.0%	30,716	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	62	57.9%	2,709	8.8%	0	0.0%	0	0.0%
\$100,001 - \$250,000	17	15.9%	2,716	8.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	23	21.5%	13,274	43.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	5	4.7%	12,017	39.1%	0	0.0%	0	0.0%
Total	107	100.0%	30,716	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	43	58.1%	1,882	9.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	10	13.5%	1,663	8.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	19	25.7%	11,079	55.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	2	2.7%	5,534	27.5%	0	0.0%	0	0.0%
Total	74	100.0%	20,158	100.0%	0	0.0%	0	0.0%

*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Minster 2016

Assessment Area/Group: Dayton OH MSA

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	1	1.3%	320	1.7%	0	0.0%	0	0.0%
Moderate	6	7.7%	2,729	14.4%	0	0.0%	0	0.0%
Low/Moderate Total	7	9.0%	3,049	16.1%	0	0.0%	0	0.0%
Middle	53	67.9%	12,933	68.2%	0	0.0%	0	0.0%
Upper	18	23.1%	2,982	15.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	18,965	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or Less	42	53.8%	7,729	40.8%	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	36	46.2%	11,235	59.2%	0	0.0%	0	0.0%
Total	78	100.0%	18,965	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	27	34.6%	1,417	7.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	22	28.2%	4,392	23.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	29	37.2%	13,155	69.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	18,965	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	15	35.7%	704	9.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	15	35.7%	3,050	39.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	12	28.6%	3,975	51.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	42	100.0%	7,729	100.0%	0	0.0%	0	0.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: Minster 2016

Assessment Area/Group :Non Metro OH

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	4	4.1%	246	2.1%
Moderate	6	6.1%	651	5.6%	22	22.4%	1,789	15.5%
Low/Moderate Total	6	6.1%	651	5.6%	26	26.5%	2,035	17.7%
Middle	37	37.8%	3,745	32.5%	32	32.7%	3,539	30.7%
Upper	55	56.1%	7,127	61.9%	39	39.8%	5,631	48.9%
Unknown	0	0.0%	0	0.0%	1	1.0%	318	2.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	98	100.0%	11,523	100.0%	98	100.0%	11,523	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	3	4.1%	161	1.4%
Moderate	1	1.4%	47	0.4%	8	11.0%	829	7.2%
Low/Moderate Total	1	1.4%	47	0.4%	11	15.1%	990	8.5%
Middle	27	37.0%	4,029	34.8%	17	23.3%	2,431	21.0%
Upper	45	61.6%	7,513	64.8%	44	60.3%	8,121	70.1%
Unknown	0	0.0%	0	0.0%	1	1.4%	47	0.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	73	100.0%	11,589	100.0%	73	100.0%	11,589	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	16.7%	50	25.9%	2	33.3%	65	33.7%
Low/Moderate Total	1	16.7%	50	25.9%	2	33.3%	65	33.7%
Middle	2	33.3%	55	28.5%	0	0.0%	0	0.0%
Upper	3	50.0%	88	45.6%	4	66.7%	128	66.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	193	100.0%	6	100.0%	193	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	66.7%	716	43.4%	0	0.0%	0	0.0%
Low/Moderate Total	2	66.7%	716	43.4%	0	0.0%	0	0.0%
Middle	1	33.3%	933	56.6%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	1,649	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	1,649	100.0%	3	100.0%	1,649	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	7	3.9%	407	1.6%
Moderate	10	5.6%	1,464	5.9%	32	17.8%	2,683	10.8%
Low/Moderate Total	10	5.6%	1,464	5.9%	39	21.7%	3,090	12.4%
Middle	67	37.2%	8,762	35.1%	49	27.2%	5,970	23.9%
Upper	103	57.2%	14,728	59.0%	87	48.3%	13,880	55.6%
Unknown	0	0.0%	0	0.0%	5	2.8%	2,014	8.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	180	100.0%	24,954	100.0%	180	100.0%	24,954	100.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: Minster 2016

Assessment Area/Group :Dayton OH MSA

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	2	3.8%	134	1.6%
Moderate	4	7.5%	555	6.8%	15	28.3%	1,630	20.1%
Low/Moderate Total	4	7.5%	555	6.8%	17	32.1%	1,764	21.7%
Middle	40	75.5%	6,231	76.7%	8	15.1%	913	11.2%
Upper	9	17.0%	1,336	16.4%	24	45.3%	4,985	61.4%
Unknown	0	0.0%	0	0.0%	4	7.5%	460	5.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	53	100.0%	8,122	100.0%	53	100.0%	8,122	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	14.3%	256	5.7%	2	7.1%	100	2.2%
Low/Moderate Total	4	14.3%	256	5.7%	2	7.1%	100	2.2%
Middle	15	53.6%	2,896	64.1%	4	14.3%	449	9.9%
Upper	9	32.1%	1,367	30.3%	16	57.1%	3,412	75.5%
Unknown	0	0.0%	0	0.0%	6	21.4%	558	12.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	4,519	100.0%	28	100.0%	4,519	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	30.0%	151	28.1%	0	0.0%	0	0.0%
Low/Moderate Total	3	30.0%	151	28.1%	0	0.0%	0	0.0%
Middle	6	60.0%	315	58.6%	1	10.0%	72	13.4%
Upper	1	10.0%	72	13.4%	1	10.0%	65	12.1%
Unknown	0	0.0%	0	0.0%	8	80.0%	401	74.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	538	100.0%	10	100.0%	538	100.0%
Multi-Family								
Low	1	20.0%	428	21.9%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	1	20.0%	428	21.9%	0	0.0%	0	0.0%
Middle	4	80.0%	1,526	78.1%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	5	100.0%	1,954	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	1,954	100.0%	5	100.0%	1,954	100.0%
HMDA Totals								
Low	1	1.0%	428	2.8%	2	2.1%	134	0.9%
Moderate	11	11.5%	962	6.4%	17	17.7%	1,730	11.4%
Low/Moderate Total	12	12.5%	1,390	9.2%	19	19.8%	1,864	12.3%
Middle	65	67.7%	10,968	72.5%	13	13.5%	1,434	9.5%
Upper	19	19.8%	2,775	18.3%	41	42.7%	8,462	55.9%
Unknown	0	0.0%	0	0.0%	23	24.0%	3,373	22.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	96	100.0%	15,133	100.0%	96	100.0%	15,133	100.0%

*Information based on 2010 ACS data

Consumer Loan Distribution Table

Exam: Minster 2016

Assessment Area/Group :Non Metro OH

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	1	1.3%	20	0.5%
Moderate	3	4.0%	163	3.9%	6	8.0%	159	3.8%
Low/Moderate Total	3	4.0%	163	3.9%	7	9.3%	179	4.3%
Middle	22	29.3%	1,336	32.0%	21	28.0%	1,258	30.1%
Upper	50	66.7%	2,673	64.1%	47	62.7%	2,736	65.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	75	100.0%	4,172	100.0%	75	100.0%	4,172	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	17	21.8%	126	16.6%
Moderate	0	0.0%	0	0.0%	20	25.6%	188	24.8%
Low/Moderate Total	0	0.0%	0	0.0%	37	47.4%	314	41.4%
Middle	31	39.7%	269	35.5%	19	24.4%	201	26.5%
Upper	47	60.3%	489	64.5%	22	28.2%	243	32.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	758	100.0%	78	100.0%	758	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	18	11.8%	146	3.0%
Moderate	3	2.0%	163	3.3%	26	17.0%	347	7.0%
Low/Moderate Total	3	2.0%	163	3.3%	44	28.8%	493	10.0%
Middle	53	34.6%	1,605	32.6%	40	26.1%	1,458	29.6%
Upper	97	63.4%	3,162	64.1%	69	45.1%	2,979	60.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	153	100.0%	4,930	100.0%	153	100.0%	4,930	100.0%

APPENDIX C

GLOSSARY OF TERMS

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.