

PUBLIC DISCLOSURE

February 6, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Buckeye Community Bank
RSSD # 2836306

105 Sheffield Center
Lorain, Ohio 44055

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	3
Description of Assessment Area.....	5
Conclusions with Respect to Performance Criteria	11
Appendix A: Assessment Area Map.....	17
Appendix B: Lending Tables	18
Appendix C: Glossary of Terms	22

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

The major factors and criteria contributing to this rating include:

- The loan-to-deposit ratio is more-than-reasonable given the institution's size, financial condition, and assessment area credit needs;
- A majority of loans and other lending-related activities are inside the assessment area;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment areas;
- The distribution of loans to borrowers reflects a poor 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 Buckeye since the previous CRA examination.

The previous CRA examination conducted July 16, 2012 resulted in a "Satisfactory" performance rating.

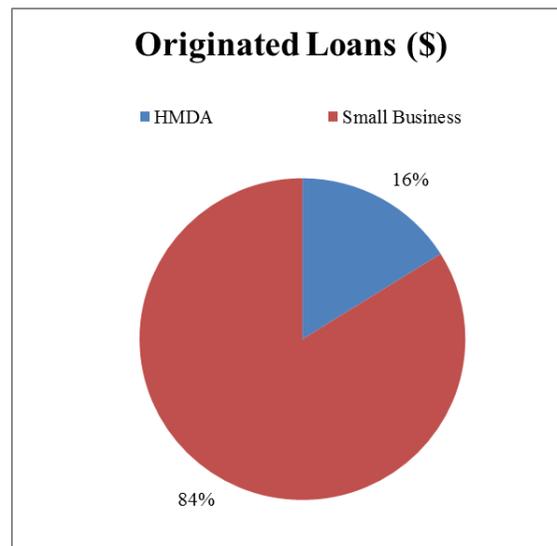
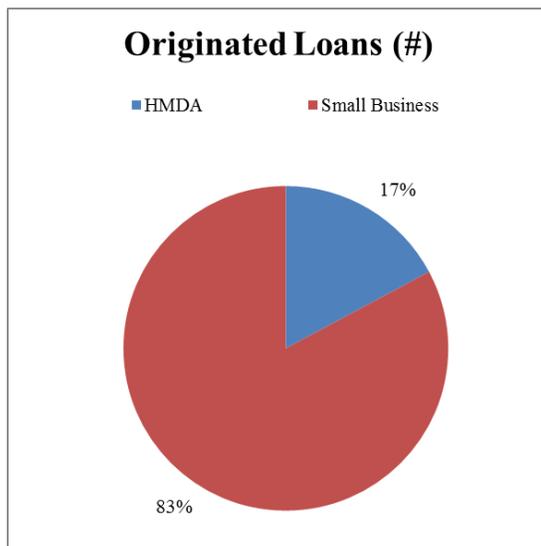
SCOPE OF EXAMINATION

The Community Reinvestment Act (CRA) performance for The Buckeye Community Bank (Buckeye) was evaluated using the interagency small bank examination procedures under Regulation BB.

Buckeye’s CRA performance was evaluated based on lending data for the period of January 1, 2014 to December 31, 2015. The products evaluated included HMDA and small business loans. HMDA loans are comprised of home purchase, refinance, and home improvement loans. Due to the low lending volume, all HMDA loans will be combined.

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

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
HMDA	83	17,180
Small Business	400	89,463
Total	483	106,643



Based on the total loan volume by number and dollar amount and composition of the loan portfolio, small business loans received the most weight, followed by HMDA loans. Geographic and borrower distribution received equal weight.

In some cases, Buckeye could not provide information for originated loans; therefore, the loan volumes utilized 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 Buckeye’s performance context.

DESCRIPTION OF INSTITUTION

Buckeye is a state member bank and the sole banking subsidiary of Buckeye Bancshares, Inc., a financial holding company headquartered in Lorain, Ohio. As of September 30, 2016, Buckeye reported \$158.3 million in total assets, an increase of 2.8% since the previous CRA evaluation.

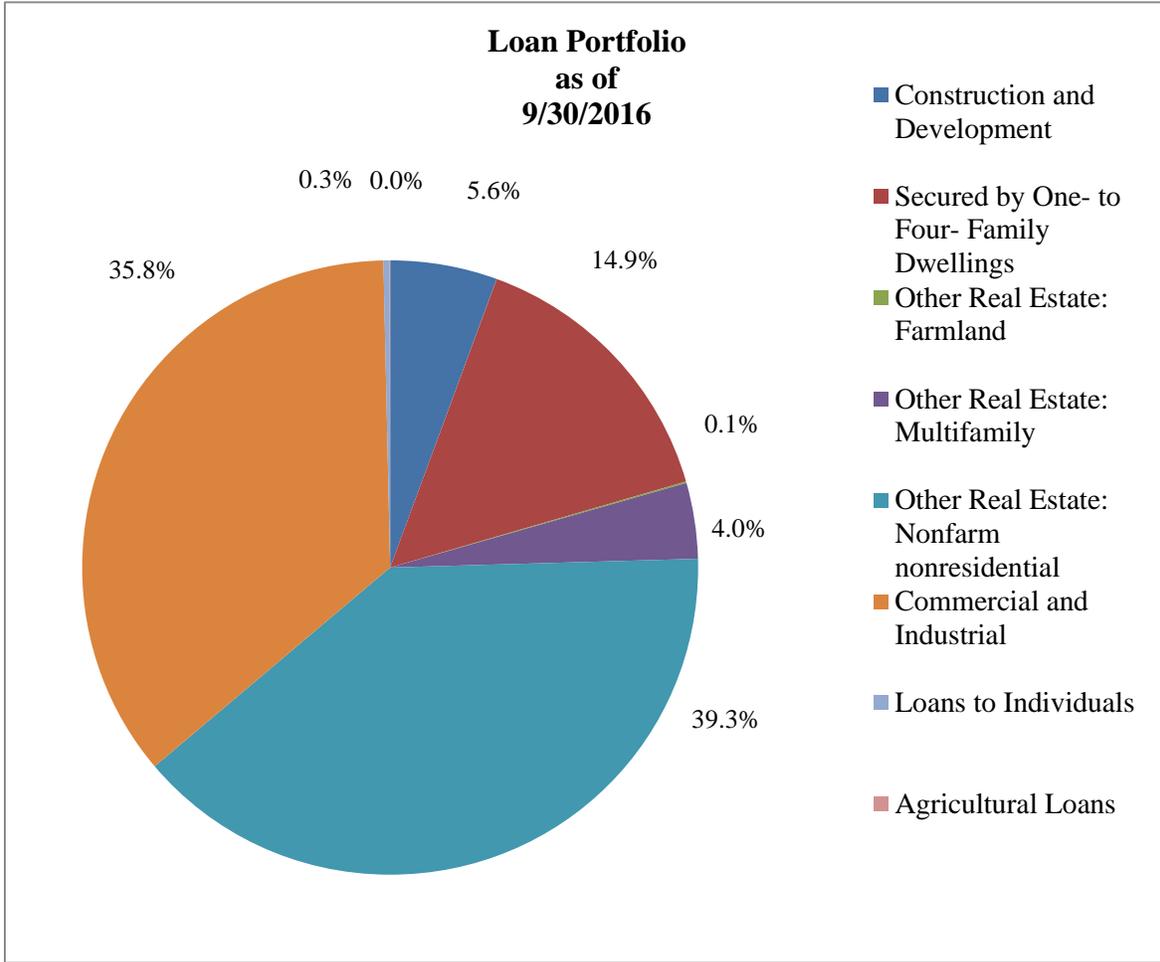
Buckeye has one banking office located in a moderate-income tract in Lorain, Ohio. Buckeye is a full-service retail bank serving the entirety of Lorain County and offering deposit accounts, residential mortgages, and consumer and commercial loans. Since the previous evaluation, Buckeye has not opened or closed any branch offices or ATMs. Although Buckeye offers a variety of retail and commercial banking products and services, it is primarily a commercial lender.

As of September 30, 2016, net loans and leases represent \$125.9 million, which is 78.7% of total assets. Net loans and leases increased by 15.9% since the previous CRA evaluation.

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

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	9/30/2016		12/31/2015		12/31/2014	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	7,169	5.6%	3,667	3.0%	4,853	4.0%
Secured by One- to Four- Family	18,959	14.9%	19,785	16.0%	19,821	16.3%
Other Real Estate: Farmland	108	0.1%	108	0.1%	108	0.1%
Other Real Estate: Multifamily	5,065	4.0%	5,929	4.8%	7,161	5.9%
Other Real Estate: Nonfarm nonresidential	50,117	39.3%	51,237	41.5%	50,489	41.6%
Commercial and Industrial	45,688	35.8%	42,397	34.3%	38,233	31.5%
Loans to Individuals	416	0.3%	438	0.4%	573	0.5%
Agricultural Loans	36	0.0%	33	0.0%	15	0.0%
Total	\$127,558	100.00%	\$123,594	100.00%	\$121,253	100.00%

* 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.



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

DESCRIPTION OF ASSESSMENT AREA

Buckeye has one assessment area in Ohio consisting of the entirety of Lorain County. Lorain County is in the Cleveland-Elyria-Mentor Metropolitan Statistical Area. Buckeye's assessment area is entirely urban and includes 74 census tracts comprised of eight low-, 18 moderate-, 32 middle-, and 15 upper-income census tracts. One tract had unknown income. None of the middle-income tracts are designated as distressed or underserved.

Buckeye's main office is located in a moderate-income census tract. The one tract with no income designation is primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

Lorain County is just south of Lake Erie and is urban. Lorain is the largest village and county seat in Lorain County. The county had a population of 301,356, according to the 2010 U.S. Census Bureau Report.

As of June 30, 2016, the Federal Deposit Insurance Corporation (FDIC) reported 18 insured financial institutions operating within Lorain County. The FDIC's market share report indicates that Buckeye ranked tenth, holding 3.24% of the market share of deposits.¹ The following table illustrates the deposit market share for the top ten financial institutions in the county.

#	Financial Institution	Deposit Market Share
1	Firstmerit Bank, National Association	26.55%
2	Northwest Bank	17.23%
3	Fifth Third Bank	11.26%
4	First Federal Savings and Loan Association of Lorain	6.07%
5	PNC Bank, National Association	5.95%
6	Talmer Bank and Trust	5.33%
7	First Federal Savings and Loan Association of Lakewood	4.51%
8	Third Federal Savings and Loan Association of Cleveland	3.95%
9	JPMorgan Chase Bank, National Association	3.38%
10	Buckeye Community Bank	3.24%

One community contact interview was conducted to provide additional information regarding the credit needs of the local community and context to the demographic and economic characteristics discussed. According to the contact, there are many community development opportunities in Lorain County and community development needs are addressed more so through local large and small businesses, rather than financial institutions. Additionally, local businesses donate a significant amount each year for community development. The contact also added that a number of jobs are coming to Lorain County as a result of business expansion and relocation.

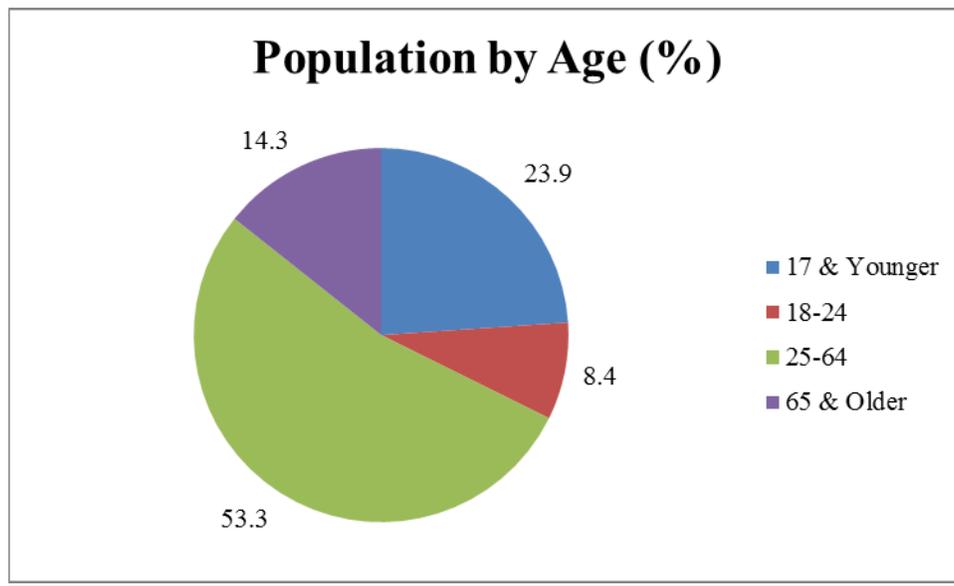
¹ <http://www2.fdic.gov/sod/sodMarketBank.asp>

Population Characteristics

According to the 2010 U.S. Census Bureau Report, the total population in the assessment area was 301,356, which represents all of Lorain County. The majority of the assessment area population (41.5%) resides in middle-income tracts.

According to the U.S. Census Bureau Report, the estimated population in Lorain County as of 2012 was 301,652, a slight increase of 0.1% since 2010.

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



Approximately 23.9% of the population is under 18, while approximately 61.7% of the population is between the ages of 18 and 64, the legal age to enter into a contract and the prime ages when individuals are generally in need of loans.

Income Characteristics

According to data from the United States Department of Housing and Urban Development (HUD), the 2010 median family income level for the assessment area was \$61,903. The 2014 and 2015 estimated median family income levels are detailed in the following table.²

² <http://www.huduser.org/portal/datasets/il/il13/index.html>

**Borrower Income Levels
Cleveland-Elyria, Ohio - MSA**

HUD Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$62,600	0 - \$31,299	\$31,300 - \$50,079	\$50,080 - \$75,119	\$75,120 - & above
2015	\$66,100	0 - \$33,049	\$33,050 - \$52,879	\$52,880 - \$79,319	\$79,320 - & above

**Borrower Income Levels
Ohio State Non-Metro**

HUD Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$55,700	0 - \$27,849	\$27,850 - \$44,559	\$44,560 - \$66,839	\$66,840 - & above
2015	\$56,900	0 - \$28,449	\$28,450 - \$45,519	\$45,520 - \$68,279	\$68,280 - & above

The assessment area contains 114,479 households, of which 80,230 are designated as families. Low- and moderate-income families represent 20.8% and 18.1% of all families in this assessment area, respectively. Approximately 10.3% of families in the assessment area are below the poverty level, which is the same rate as Ohio.

According to the 2015 data from the Economic Research Service of the United States Department of Agriculture (USDA), household poverty rates for Lorain County as follows:

County	2000 Poverty Rate	2015 Poverty Rate	Change
Lorain	8.8%	13.5%	53.4%
Ohio	10.7%	14.8%	38.3%
United States	11.3%	14.7%	30.1%

As illustrated in the chart above, 13.5% of Lorain County’s population was in poverty, which was higher than the poverty rate in 2000 of 8.8%. Although the poverty rate for Lorain County is lower than the state and national averages, low- and moderate-income people in this area could still encounter difficulty obtaining bank loans due to insufficient financial resources.

Labor, Employment and Economic Characteristics

According to the Ohio Office of Policy, Research, and Strategic Planning, the largest industries by average employment are manufacturing; trade, transportation and utilities; and professional and business services. The highest weekly wages by industry are federal government \$2,045; manufacturing \$1,189; and goods producing \$1,110. The following table identifies the employment sectors and major employers in Buckeye’s assessment area, but is not all-inclusive.³

³ http://www.development.ohio.gov/reports/reports_countytrends_map.htm

County	Primary Employment Sectors	Major Employers
Lorain	Trade, Transportation, and Utilities; Professional and Business Services; Education and Health Services; Construction; Leisure and Hospitality	Mercy Health; Elyria City Schools; Emerson Electric/Ridge Tool; EMH Regional Healthcare System; Ford Motor Co.

The following table shows the 2014 and 2015 average annual unemployment rate for Lorain County and Ohio.

**Unemployment Rates
Buckeye Community Bank**

Area	Years - Annualized	
	2014	2015
Lorain Co.	5.6	4.5
Cleveland-Elyria, OH MSA	5.0	4.0
Ohio	4.9	4.6
National	5.4	4.8

Not Seasonally Adjusted, Data Extracted on January 5, 2017

The unemployment rate for Lorain County was higher than Ohio for 2014 and lower for 2015, indicating an improvement. Although Lorain County and Ohio experienced declines in the rate between the two years, Lorain County's rate of decrease was more significant than Ohio's.

Housing Characteristics

There were 125,546 housing units in the assessment area, based on the 2010 U.S. Census. Within the assessment area, 67.7% of the units were owner-occupied, 23.5% were rental units, 2.3% were mobile homes, and 8.8% were vacant. The owner-occupancy rate in Lorain County was higher when compared to Ohio's, where 61.7% of the units were owner-occupied. The housing type is comprised of 80.2% single family, 2.3% mobile homes, and 10.7% multi-family homes. The housing income tract distribution is 7.8% in low-, 22.8% in moderate-, 40.7% in middle-, and 28.7% in upper-income census tracts, which indicates that most of the demand for home mortgage lending would be in middle- and upper-income tracts.

The median age of the housing stock in the assessment area was 44 years, with 23.1% of the stock built before 1950, which is comparable to the median statewide age at 44 years, as well. Within the assessment area, the median age of housing stock was 59 years in low-income tracts and 53 years in moderate-income tracts; therefore, it appears there could be a significant need for home improvement and rehabilitation loans in lower-income areas.

The median housing value in the assessment area is \$147,384, with an affordability ratio of 31.9%. The higher the affordability ratio, the more affordable a home is considered. The housing affordability ratio is calculated by dividing the median household income by the median housing value. The housing stock in the assessment area was slightly more affordable than in Ohio at 34.7%.

Furthermore, based on the 2015 median family income for the Cleveland-Elyria MSA (\$66,100), approximately 35.0% of the homes valued up to \$121,147 in the assessment area would be considered affordable for low-income individuals and 72.8% of the homes valued up to \$193,835 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28% of gross income for a fixed, 30-year loan.

According to RealtyTrac,⁴ one in every 1,054 properties in Lorain County was in foreclosure in December 2016. This was higher than Ohio's ratio of one in every 1,292 properties.

Geography Name	Ratio of Properties Receiving Foreclosure Filings in December 2016
Lorain	1 in 1054
Ohio	1 in 1292
United States	1 in 1537

According to Sperling's Best Places,⁵ the median home cost in Lorain County was \$125,500, which represents an appreciation of 16.2% since the prior year. Compared to the rest of the country, Lorain County's cost of living is 8.0% lower than the national average.

The median gross rent in the assessment area was \$681, with 22.5% of the rents under \$499 a month, according to the 2010 U.S. Census. The median gross rent in the county was slightly higher than Ohio at \$678.

The following table further illustrates the demographics of Buckeye's assessment area.

⁴ www.realtytrac.com

⁵ <http://bestplaces.net>

Combined Demographics Report

Assessment Area(s): Buckeye 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	10.8	5,641	7	2,298	40.7	16,647	20.7
Moderate-income	18	24.3	15,534	19.4	2,879	18.5	14,529	18.1
Middle-income	32	43.2	33,331	41.5	2,046	6.1	17,519	21.8
Upper-income	15	20.3	25,724	32.1	1,064	4.1	31,535	39.3
Unknown-income	1	1.4	0	0	0	0	0	0
Total Assessment Area	74	100.0	80,230	100.0	8,287	10.3	80,230	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	9,777	3,546	4.2	36.3	4,468	45.7	1,763	18
Moderate-income	28,594	14,324	16.9	50.1	10,830	37.9	3,440	12
Middle-income	51,084	37,212	43.8	72.8	10,002	19.6	3,870	7.6
Upper-income	36,091	29,873	35.2	82.8	4,224	11.7	1,994	5.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	125,546	84,955	100.0	67.7	29,524	23.5	11,067	8.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	698	6.3	626	6.1	63	7.7	9	13.2
Moderate-income	1,620	14.6	1,469	14.3	141	17.3	10	14.7
Middle-income	4,819	43.3	4,458	43.5	326	39.9	35	51.5
Upper-income	3,992	35.9	3,691	36	287	35.1	14	20.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	11,129	100.0	10,244	100.0	817	100.0	68	100.0
Percentage of Total Businesses:				92.0		7.3		.6
	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	5	1.9	5	1.9	0	0	0	0
Middle-income	175	65.1	172	64.9	3	75	0	0
Upper-income	89	33.1	88	33.2	1	25	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	269	100.0	265	100.0	4	100.0	0	.0
Percentage of Total Farms:				98.5		1.5		.0

2015 FFIEC Census Data and 2015 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Buckeye's performance under the lending test is considered satisfactory, as it made a majority of its loans inside its assessment area and both the overall geographic and borrower distribution of lending are considered reasonable.

Loan-to-Deposit Ratio

A financial institution's 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 the total by the number of quarters.

The following table shows Buckeye's quarterly LTD ratios for the 18 quarters since the previous evaluation, along with the average LTD for the same period.

Buckeye Community Bank Loan-to-Deposit Ratios		
AS OF DATE	BUCKEYE CMNTY BK	CUSTOM PEER GROUP AVG
September 30, 2016	91.94	58.22
June 30, 2016	91.20	62.02
March 31, 2016	91.20	62.87
December 31, 2015	87.28	61.53
September 30, 2015	85.66	65.19
June 30, 2015	90.48	67.51
March 31, 2015	87.47	72.61
December 31, 2014	83.81	73.19
September 30, 2014	87.65	64.00
June 30, 2014	90.35	68.16
March 31, 2014	88.81	61.49
December 31, 2013	88.27	63.38
September 30, 2013	85.41	62.45
June 30, 2013	85.78	65.52
March 31, 2013	85.18	67.56
December 31, 2012	80.16	68.78
September 30, 2012	83.44	62.45
June 30, 2012	83.64	62.74
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation	87.10	64.98

Buckeye has averaged 87.1% over the past 18 quarters of operation and exceeded the custom peer group average ratio of 64.98.⁶ Overall, Buckeye’s performance has been consistent with a slight increase since the previous performance evaluation.

Buckeye’s LTD ratio is more-than-reasonable given its size, financial condition, and assessment area credit needs.

Lending in the Assessment Area

Buckeye’s HMDA and small business loans were analyzed to determine the volume of lending inside and outside its assessment area. The following table shows the distribution of loans made inside and outside its assessment area

Lending Inside and Outside the Assessment Area

Exam: Buckeye Community Bank, Initial

Loan Type - Description	Inside				Outside				Total	
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	\$(000s)
CV - Home Purchase - Conventional	21	48.8	4,105	48.8	22	51.2	4,299	51.2	43	8,404
HI - Home Improvement	1	50.0	240	36.5	1	50.0	417	63.5	2	657
MF - Multi-Family Housing	4	57.1	899	43.0	3	42.9	1,194	57.0	7	2,093
RF - Refinancing	17	54.8	2,578	42.8	14	45.2	3,448	57.2	31	6,026
Total HMDA related	43	51.8	7,822	45.5	40	48.2	9,358	54.5	83	17,180
SB - Small Business	302	75.5	63,095	70.5	98	24.5	26,368	29.5	400	89,463
Total Small Bus. related	302	75.5	63,095	70.5	98	24.5	26,368	29.5	400	89,463
TOTAL LOANS	345	71.4	70,917	66.5	138	28.6	35,726	33.5	483	106,643

As the aforementioned table indicates, a majority (71.4% by volume and 66.5% by dollar amount) of Buckeye’s loans were made inside its delineated assessment area.

Geographic Distribution of Lending

The geographic distribution in this assessment area is reasonable due to Buckeye’s adequate performance for HMDA and small business loans.

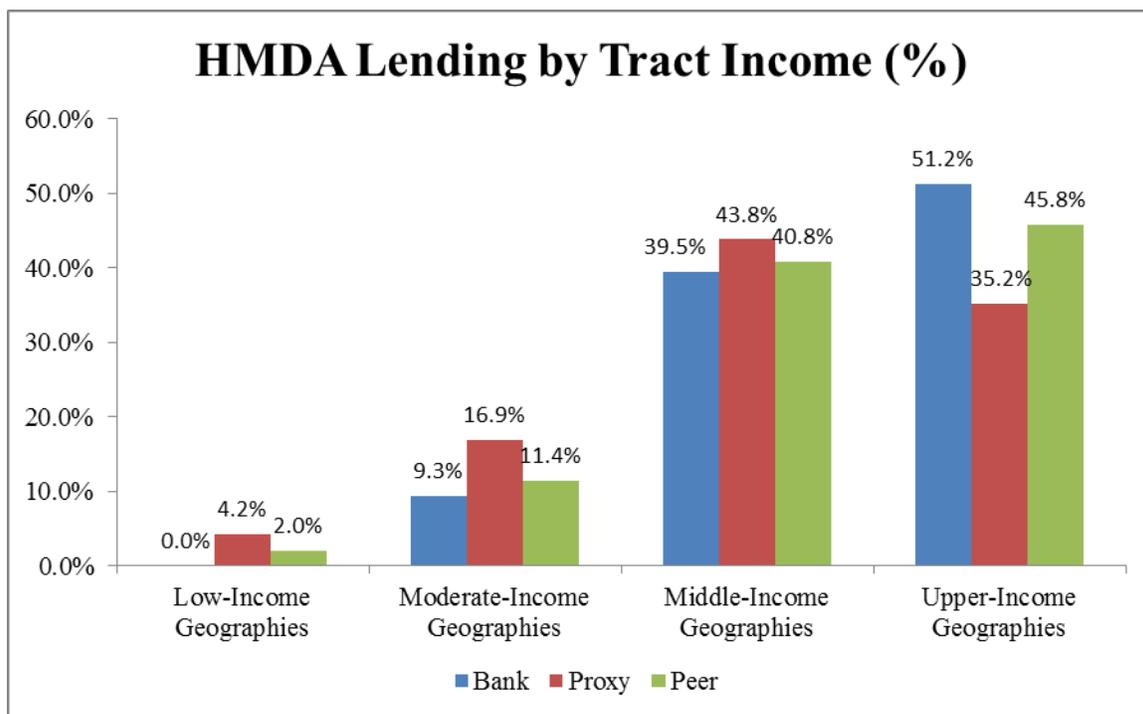
⁶ National peer group consists of all commercial banks having assets between \$100 and \$300 million in nonmetropolitan areas with three or more full-service offices.

Buckeye made loans in 46 out of 74 of its tracts, which indicates there are some lending gaps in the assessment area. These are mainly associated with Buckeye’s low volume of HMDA lending due to its primary focus on small business lending.

HMDA Lending

Buckeye’s HMDA lending performance was compared to owner-occupied housing units in the assessment area (proxy) for 2014 and 2015. Buckeye originated 43 HMDA loans in the assessment area during the review period. Of the 43 loans, none were made in low-, four in moderate-, 17 in middle-, and 22 were made in upper-income tracts.

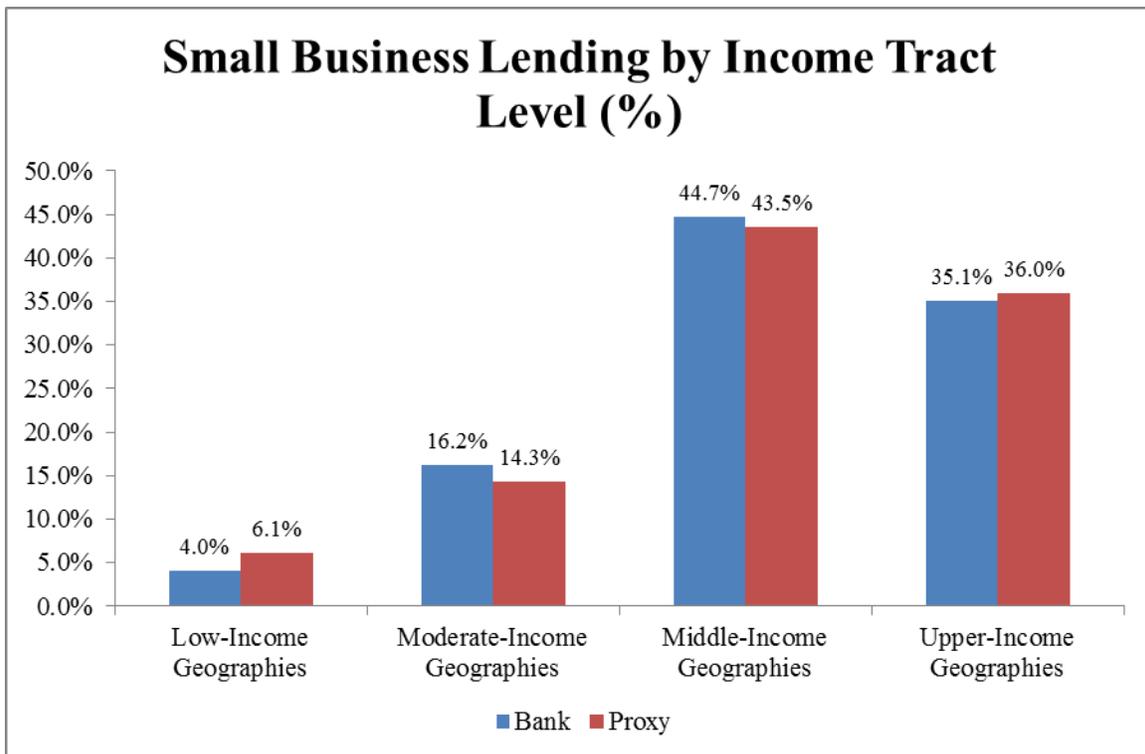
As shown in the graph below, Buckeye did not make any HMDA loans in low- income tracts. Buckeye made a lower percentage of HMDA loans in moderate- and middle-income tracts compared to proxy. Due to Buckeye’s performance in moderate-income tracts, the geographic distribution of HMDA loans is considered reasonable.



Small Business

Buckeye originated 302 small business loans in the assessment area during the review period. Of the 302 loans, 12 were made in low-, 49 in moderate-, 135 in middle-, and 106 were made in upper-income tracts.

As shown in the graph below, Buckeye’s performance of lending was slightly below proxy in low-, above proxy in moderate- and middle-income tracts, and well below in upper-income tracts. Overall, Buckeye’s geographic distribution for small business loans is considered reasonable.

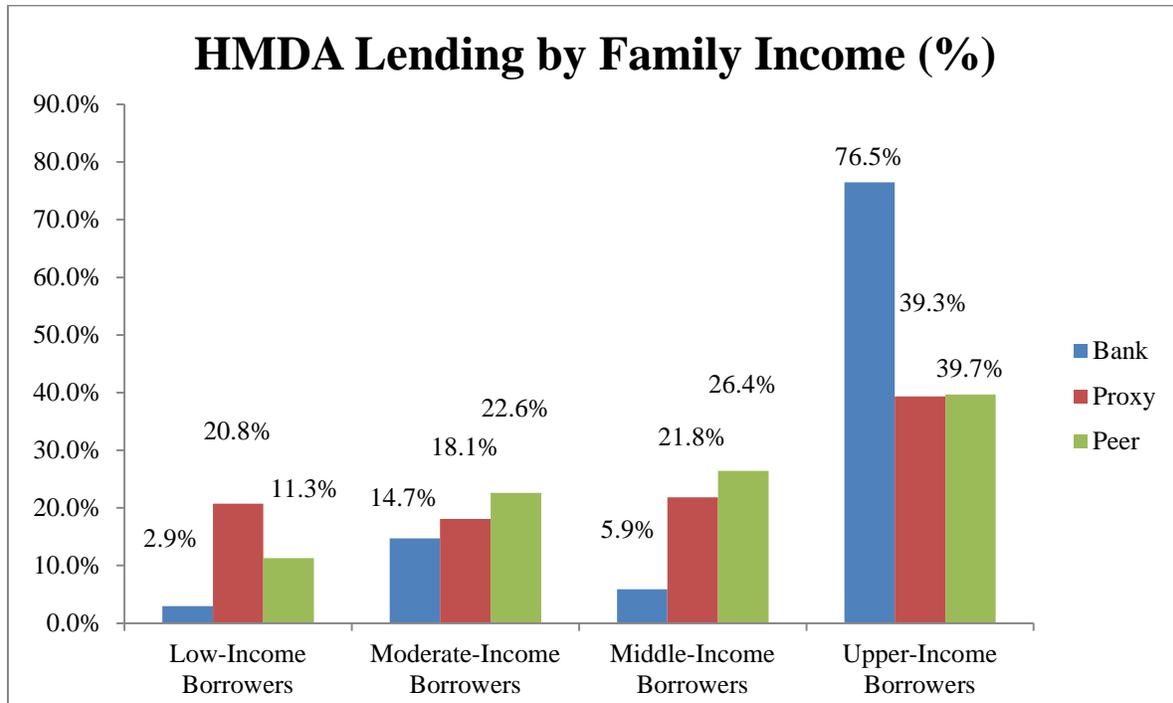


Borrower Distribution of Lending

Buckeye's lending to borrowers of different income levels, businesses of different revenue sizes, and lending to small farms of different revenue sizes is considered reasonable. The borrower distribution of HMDA lending is poor. Lending to small businesses under \$1MM in revenue is reasonable.

HMDA Lending

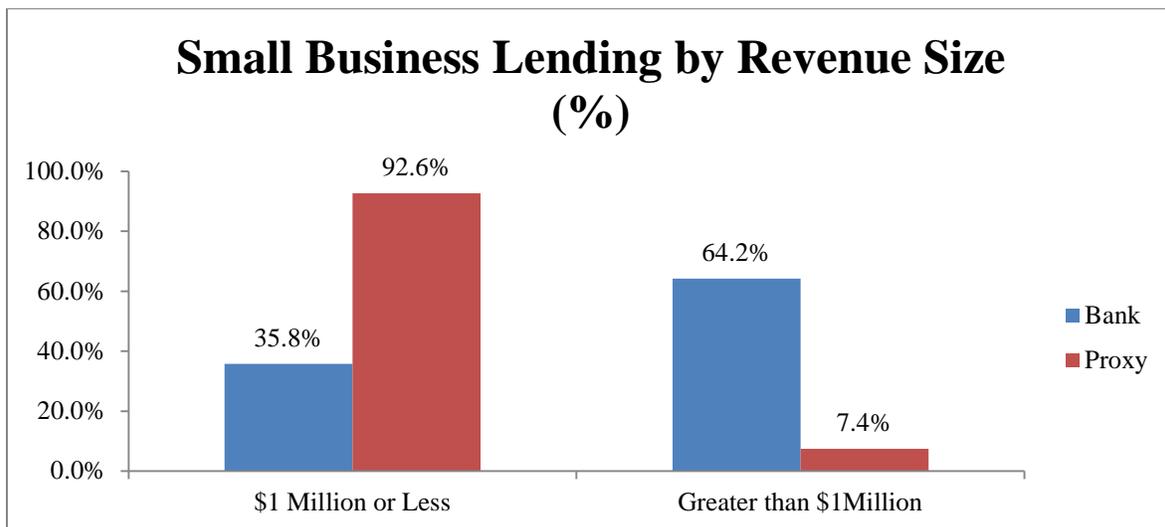
Buckeye's HMDA lending performance was compared to the income levels of families in the assessment area (proxy) for 2014 and 2015. Buckeye's lending to low-, moderate-, and middle-income families was poor, while lending to upper-income families exceeded proxy, as indicated in the chart below.



Buckeye’s percentage is below the proxy to low-income families for residential lending, as a result the borrower distribution of residential lending is poor.

Small Business Lending

Small businesses are defined as those with gross revenues of less than or equal to \$1 million. Buckeye originated 302 small business loans totaling \$63.1 million during the evaluation period. Further, Buckeye originated 35.8% of loans to businesses with \$1 million or less in revenue compared to proxy at 92.6%. Buckeye’s performance was compared to the number of businesses within the assessment area (proxy).



According to lending data, 51.3% of Buckeye's business loans were for \$100,000 or less; 24.8% of business loans were for amounts greater than \$100,000, but less than or equal to \$250,000; and 21.5% business loans were for amounts greater than \$250,000, but less than or equal to \$1 million. Lastly, 2.3% of Buckeye's business loans were for amounts greater than \$1 million. Smaller loans are generally commensurate with the borrowing needs of smaller businesses. Buckeye's small business lending activity is considered reasonable and demonstrates that Buckeye is effectively meeting the credit needs of its local businesses.

Response to Consumer Complaints

No CRA-related complaints were filed against Buckeye during the evaluation period.

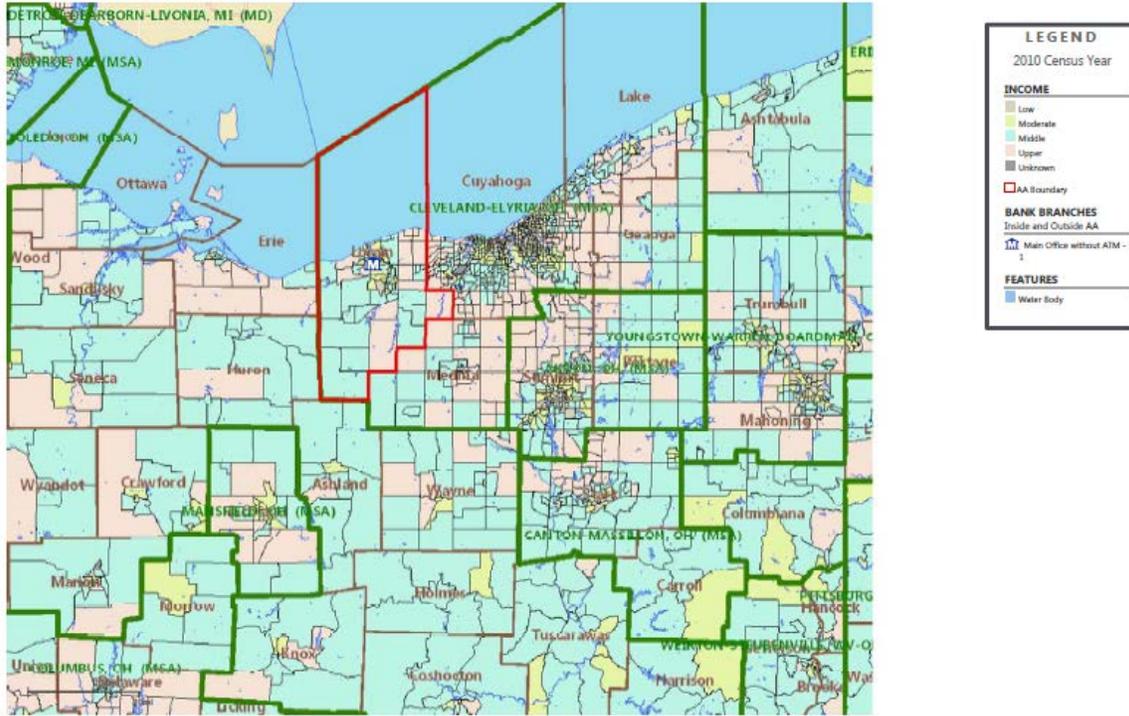
Fair Lending or Other Illegal Credit Practices Review

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified during this evaluation period.

APPENDIX A

ASSESSMENT AREA MAP

Assessment Area: Buckeye 2015



APPENDIX B
LENDING TABLES

HMDA Loan Distribution Table

Exam: Buckeye Community Bank, Initial

Assessment Area/Group :All Assessment Areas

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	4.8%	76	1.9%
Moderate	1	4.8%	83	2.0%	3	14.3%	405	9.9%
Low/Moderate Total	1	4.8%	83	2.0%	4	19.0%	481	11.7%
Middle	9	42.9%	1,462	35.6%	2	9.5%	117	2.9%
Upper	11	52.4%	2,560	62.4%	12	57.1%	3,145	76.6%
Unknown	0	0.0%	0	0.0%	3	14.3%	362	8.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	4,105	100.0%	21	100.0%	4,105	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	11.8%	225	8.7%	2	11.8%	125	4.8%
Low/Moderate Total	2	11.8%	225	8.7%	2	11.8%	125	4.8%
Middle	5	29.4%	643	24.9%	0	0.0%	0	0.0%
Upper	10	58.8%	1,710	66.3%	13	76.5%	2,134	82.8%
Unknown	0	0.0%	0	0.0%	2	11.8%	319	12.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	2,578	100.0%	17	100.0%	2,578	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	240	100.0%	1	100.0%	240	100.0%
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	1	100.0%	240	100.0%	1	100.0%	240	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	200	22.2%	0	0.0%	0	0.0%
Low/Moderate Total	1	25.0%	200	22.2%	0	0.0%	0	0.0%
Middle	3	75.0%	699	77.8%	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%	4	100.0%	899	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	899	100.0%	4	100.0%	899	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	1	2.3%	76	1.0%
Moderate	4	9.3%	508	6.5%	5	11.6%	530	6.8%
Low/Moderate Total	4	9.3%	508	6.5%	6	14.0%	606	7.7%
Middle	17	39.5%	2,804	35.8%	2	4.7%	117	1.5%
Upper	22	51.2%	4,510	57.7%	26	60.5%	5,519	70.6%
Unknown	0	0.0%	0	0.0%	9	20.9%	1,580	20.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	43	100.0%	7,822	100.0%	43	100.0%	7,822	100.0%

*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Buckeye Community Bank, Initial

Assessment Area/Group: All Assessment Areas

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	12	4.0%	2,054	3.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	49	16.2%	8,936	14.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	61	20.2%	10,990	17.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	135	44.7%	24,996	39.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	106	35.1%	27,109	43.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	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%	0	0.0%	0	0.0%
Total	302	100.0%	63,095	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	108	35.8%	16,022	25.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	194	64.2%	47,073	74.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	302	100.0%	63,095	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	155	51.3%	7,253	11.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	75	24.8%	13,545	21.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	65	21.5%	30,787	48.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	7	2.3%	11,510	18.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	302	100.0%	63,095	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	56	51.9%	2,346	14.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	36	33.3%	6,326	39.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	16	14.8%	7,350	45.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	108	100.0%	16,022	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

*Information based on 2010 ACS data

Peer Group HMDA Loan Distribution Table

Exam ID: Buckeye 2017 Final
 Buckeye 2015

Selected Year: 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	89	1.83%	5,565	0.76%	502	10.3%	35,722	4.91%
Moderate	597	12.25%	46,560	6.39%	979	20.09%	102,571	14.09%
<i>Low/Moderate Total</i>	<i>686</i>	<i>14.08%</i>	<i>52,125</i>	<i>7.16%</i>	<i>1,481</i>	<i>30.39%</i>	<i>138,293</i>	<i>18.99%</i>
Middle	2,010	41.25%	242,197	33.26%	1,054	21.63%	151,791	20.84%
Upper	2,177	44.67%	433,891	59.58%	1,455	29.86%	323,797	44.46%
Unknown	0	0.0%	0	0.0%	883	18.12%	114,332	15.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4,873	100.0%	728,213	100.0%	4,873	100.0%	728,213	100.0%
	Refinance							
Low	69	1.99%	4,101	0.84%	240	6.92%	17,635	3.6%
Moderate	339	9.78%	26,849	5.49%	530	15.29%	50,548	10.33%
<i>Low/Moderate Total</i>	<i>408</i>	<i>11.77%</i>	<i>30,950</i>	<i>6.32%</i>	<i>770</i>	<i>22.21%</i>	<i>68,183</i>	<i>13.93%</i>
Middle	1,364	39.34%	160,249	32.74%	700	20.19%	84,968	17.36%
Upper	1,695	48.89%	298,233	60.93%	1,178	33.98%	211,515	43.22%
Unknown	0	0.0%	0	0.0%	819	23.62%	124,766	25.49%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,467	100.0%	489,432	100.0%	3,467	100.0%	489,432	100.0%
	Home Improvement							
Low	13	3.19%	220	1.1%	52	12.75%	1,155	5.77%
Moderate	59	14.46%	1,120	5.59%	82	20.1%	2,916	14.56%
<i>Low/Moderate Total</i>	<i>72</i>	<i>17.65%</i>	<i>1,340</i>	<i>6.69%</i>	<i>134</i>	<i>32.84%</i>	<i>4,071</i>	<i>20.33%</i>
Middle	193	47.3%	8,802	43.96%	104	25.49%	5,152	25.73%
Upper	143	35.05%	9,880	49.35%	155	37.99%	9,235	46.12%
Unknown	0	0.0%	0	0.0%	15	3.68%	1,564	7.81%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	408	100.0%	20,022	100.0%	408	100.0%	20,022	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	7	33.33%	6,676	9.54%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>7</i>	<i>33.33%</i>	<i>6,676</i>	<i>9.54%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	9	42.86%	10,568	15.1%	0	0.0%	0	0.0%
Upper	5	23.81%	52,751	75.36%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	21	100.0%	69,995	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	69,995	100.0%	21	100.0%	69,995	100.0%
	HMDA Totals							
Low	171	1.95%	9,886	0.76%	794	9.05%	54,512	4.17%
Moderate	1,002	11.43%	81,205	6.21%	1,591	18.14%	156,035	11.93%
<i>Low/Moderate Total</i>	<i>1,173</i>	<i>13.38%</i>	<i>91,091</i>	<i>6.97%</i>	<i>2,385</i>	<i>27.2%</i>	<i>210,547</i>	<i>16.1%</i>
Middle	3,576	40.78%	421,816	32.26%	1,858	21.19%	241,911	18.5%
Upper	4,020	45.84%	794,755	60.78%	2,788	31.79%	544,547	41.64%
Unknown	0	0.0%	0	0.0%	1,738	19.82%	310,657	23.76%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8,769	100.0%	1,307,662	100.0%	8,769	100.0%	1,307,662	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Buckeye 2017 Final
Buckeye 2014

Selected Year: 2014

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	59	1.31%	3,614	0.53%	368	8.14%	25,884	3.83%
Moderate	435	9.62%	32,954	4.87%	906	20.04%	89,389	13.22%
<i>Low/Moderate Total</i>	<i>494</i>	<i>10.93%</i>	<i>36,568</i>	<i>5.41%</i>	<i>1,274</i>	<i>28.18%</i>	<i>115,273</i>	<i>17.05%</i>
Middle	1,907	42.18%	224,009	33.13%	1,000	22.12%	136,603	20.21%
Upper	2,120	46.89%	415,475	61.46%	1,520	33.62%	326,434	48.29%
Unknown	0	0.0%	0	0.0%	727	16.08%	97,742	14.46%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4,521	100.0%	676,052	100.0%	4,521	100.0%	676,052	100.0%
	Refinance							
Low	50	1.77%	3,322	0.9%	157	5.56%	11,028	2.99%
Moderate	327	11.57%	25,644	6.95%	471	16.67%	42,826	11.61%
<i>Low/Moderate Total</i>	<i>377</i>	<i>13.34%</i>	<i>28,966</i>	<i>7.85%</i>	<i>628</i>	<i>22.22%</i>	<i>53,854</i>	<i>14.59%</i>
Middle	1,201	42.5%	134,600	36.48%	636	22.51%	72,016	19.52%
Upper	1,248	44.16%	205,450	55.68%	1,112	39.35%	182,885	49.56%
Unknown	0	0.0%	0	0.0%	450	15.92%	60,261	16.33%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,826	100.0%	369,016	100.0%	2,826	100.0%	369,016	100.0%
	Home Improvement							
Low	17	4.89%	309	2.25%	28	8.05%	716	5.22%
Moderate	55	15.8%	1,079	7.87%	70	20.11%	1,612	11.76%
<i>Low/Moderate Total</i>	<i>72</i>	<i>20.69%</i>	<i>1,388</i>	<i>10.12%</i>	<i>98</i>	<i>28.16%</i>	<i>2,328</i>	<i>16.98%</i>
Middle	148	42.53%	5,002	36.48%	95	27.3%	2,755	20.09%
Upper	128	36.78%	7,321	53.4%	142	40.8%	7,686	56.06%
Unknown	0	0.0%	0	0.0%	13	3.74%	942	6.87%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	348	100.0%	13,711	100.0%	348	100.0%	13,711	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	7	70.0%	6,373	32.16%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>7</i>	<i>70.0%</i>	<i>6,373</i>	<i>32.16%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	10.0%	1,013	5.11%	0	0.0%	0	0.0%
Upper	2	20.0%	12,432	62.73%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	10	100.0%	19,818	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	19,818	100.0%	10	100.0%	19,818	100.0%
	HMDA Totals							
Low	126	1.64%	7,245	0.67%	553	7.18%	37,628	3.49%
Moderate	824	10.69%	66,050	6.12%	1,447	18.78%	133,827	12.41%
<i>Low/Moderate Total</i>	<i>950</i>	<i>12.33%</i>	<i>73,295</i>	<i>6.8%</i>	<i>2,000</i>	<i>25.96%</i>	<i>171,455</i>	<i>15.9%</i>
Middle	3,257	42.27%	364,624	33.81%	1,731	22.47%	211,374	19.6%
Upper	3,498	45.4%	640,678	59.4%	2,774	36.0%	517,005	47.93%
Unknown	0	0.0%	0	0.0%	1,200	15.57%	178,763	16.57%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7,705	100.0%	1,078,597	100.0%	7,705	100.0%	1,078,597	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.