

## **PUBLIC DISCLOSURE**

February 24, 2025

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The Andover Bank  
RSSD #27614

19 Public Square  
P.O. Box 1300  
Andover, Ohio 44003

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

The Andover Bank (Andover) is rated: **Outstanding**

The Lending Test is rated: **Satisfactory**

The Community Development Test is rated: **Outstanding**

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 (AA) credit needs;
- A majority of loans and other lending-related activities are in the AA;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income);
- The geographic distribution of loans reflects an excellent dispersion throughout the AA;
- The bank's community development performance demonstrates an excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

## SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* was utilized to evaluate Andover's Community Reinvestment Act (CRA) Performance under Regulation BB. As an interstate bank, Ohio Valley is subject to Section 109 of the Riegle-Neal Interstate Banking and Branching Efficiency Act.<sup>1</sup> The evaluation considered CRA performance context, including Andover's asset size, financial condition, business strategy and market competition, as well as the demographics, economic characteristics, and credit needs. The following data was reviewed:

- Andover's 16 quarter average net loan-to-deposit ratio.
- Home Mortgage Disclosure Act (HMDA)-reportable (home purchase, refinance, home improvement, multi-family, and other purpose closed-end) were analyzed from January 1, 2022, through December 31, 2023. Home equity and consumer (motor vehicle, other secured, other unsecured) loans were analyzed from January 1, 2023, through December 31, 2023.

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<sup>1</sup> Section 109 of the Act prohibits a bank from establishing or acquiring a branch or branches outside its home state primarily for the purpose of deposit production.

- Based on the total loan volume by number and dollar amount, HMDA-reportable lending received the most weight, followed by home equity and consumer lending, respectively. There was only enough volume to evaluate home equity and consumer lending in Nonmetropolitan Ohio.
- In accordance with CRA examination procedures, the HMDA universe was reviewed,<sup>2</sup> and conclusions were reached in the aggregate. A sample of home equity and consumer loans was chosen due to significant volume, and as such, an accurate conclusion concerning the bank's lending record could not be reached without their inclusion. Conclusions were reached in the aggregate for consumer loans.
- Aggregated (peer) lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AA, was used as a comparison in evaluating Andover's lending performance in 2022 and 2023.
- Borrower distribution received more weight than geographic distribution based on the higher percentage of low- and moderate-income (LMI) families compared to LMI geographies in the AAs.
- Lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product, however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when the outcome impacted the analyses.
- Community development activities funded between February 23, 2021, through February 24, 2025, were assessed. Community development activities are comprised of community development loans, investments, and services.

As a full-service interstate bank, the scope of this evaluation includes a full-scope evaluation of at least one AA in each state where Andover has deposit-taking facilities. The determination of which AAs received full-scope versus limited-scope evaluations was based on the following criteria: the volume of lending by number of loans and dollar amount as a percentage of overall and statewide lending activity, deposit market share, number of branches, percentage of deposits, percentage of low- and moderate-income geographies, volume of community development activity, and other non-financial considerations. Lastly, AAs not subject to full-scope reviews at the previous evaluation were considered to ensure in-depth analyses of all AAs with deposit-taking facilities receive full-scope evaluations at some time.

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<sup>2</sup>HMDA data was reviewed since the bank's previous evaluation; however, only data for 2022 and 2023 is presented in this evaluation.

For the purpose of this evaluation, Andover has the following three CRA delineated AAs:

- Nonmetropolitan Ohio – Full-scope evaluation
  - Consists of the entirety of Ashtabula County
- Cleveland-Elyria, OH Metropolitan Statistical Area (MSA) #17460 – (Cleveland-Elyria) – Limited-scope evaluation
  - Consists of portions of Lake and Geauga counties (excluding Cuyahoga, Lorain, and Medina counties)
  - Since the previous evaluation, Andover expanded its AA in Lake County by adding 13 tracts on the west border of the AA
- Erie-Meadville, PA Combined Statistical Area (CSA) #240 – (Erie CSA) – Full-scope evaluation
  - Consists of a portion of Erie County and a portion of Crawford County
  - The Erie CSA is comprised of the Erie, PA MSA #21500 (Erie MSA) and Crawford County, which is in Nonmetropolitan Pennsylvania. The Erie MSA is comprised of the entirety of Erie County.

Nonmetropolitan Ohio was given the greatest weight in the evaluation, as it contained the largest percentage of branches and originated the largest amount of loans (by number and dollar amount) followed by the Erie CSA. A detailed description of each full-scope AA is presented in subsequent sections of this performance evaluation.

To better understand AA community development and credit needs, several sources were used, including publicly accessible data and information submitted by the bank. Six community contacts were conducted. Interviews were conducted with representatives from a technical school, board of realtors, redevelopment authority, chamber of commerce, and two nonprofit organizations. These contacts operate inside Andover's AAs. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the AA. Information obtained from these interviews helped establish context for the communities in which Andover operates and gathers information on its performance. More detailed information obtained from these contacts is included in the "Description of the Institution's Operations" section for each full-scope AA.

## DESCRIPTION OF INSTITUTION

Andover is an interstate community bank and is a banking subsidiary of Andover Bancorp, Inc., both entities are headquartered in Andover, Ohio. The bank's characteristics include:

- Andover has total assets of \$558.7 million and total deposits of \$528.3 million as of December 31, 2023. Andover has seen a 30.8% increase in total assets and a 44.4% increase in total deposits since the previous evaluation.
- All of Andover's Automated Teller Machines (ATMs) are cash-only and will be referred to as ATMs throughout the remainder of this document. Andover maintains its main office with ATM and nine branches with ATMs.
- Since the previous evaluation, Andover opened a Loan Production Office in 2022, in Stow, Ohio (Summit County) in a middle-income tract in the Akron, OH MSA, which is outside the bank's delineated CRA footprint.
- Andover has not opened or closed any branches since the previous evaluation.
- Andover is a full-service retail bank that offers traditional products, including consumer and business checking and savings accounts, home equity loans, motor vehicle loans, credit cards, and commercial loans.
- Andover's website, [andover.bank](https://www.andoverbank.com), and online and mobile banking, supplements its branch and ATM networks. Customers can confirm balances, what transactions have been posted, pay bills, transfer funds between accounts, and make deposits. Andover has seen a steady increase in the number of online banking and mobile app users since the previous evaluation.

The following table shows the bank's loan portfolio composition as of December 31, 2023. Andover's primary business focus is real estate.

COMPOSITION OF LOAN PORTFOLIO					
Loan Type	12/31/2023		12/31/2022		% Change
	\$ (000s)	Percent	\$ (000s)	Percent	
Construction and Development	1,868	0.9%	1,716	0.8%	8.9%
Secured by One- to Four- Family Dwellings	171,690	80.7%	178,239	84.1%	-3.7%
Other Real Estate: Farmland	448	0.2%	518	0.2%	-13.5%
Multifamily	5,639	2.7%	934	0.4%	503.7%
Nonfarm nonresidential	25,050	11.8%	22,222	10.5%	12.7%
Commercial and Industrial	3,901	1.8%	4,557	2.1%	-14.4%
Loans to Individuals	4,070	1.9%	3,817	1.8%	6.6%
Agricultural Loans	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>\$212,666</b>	<b>100.00%</b>	<b>\$212,003</b>	<b>100.00%</b>	<b>0.3%</b>

\*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.

Andover's investment portfolio as of December 31, 2023, was \$253.9 million, which represents 45.4% of total assets. U.S. Treasury and Agency securities accounted for 52.7% of total investments while municipal securities and interest-bearing bank balances accounted for 38.8% and 8.6%, respectively of the remaining total investments.

There are no known legal, financial or other factors impending Andover's ability to help meet the credit needs of its communities.

Andover was rated Outstanding under the CRA at its previous evaluation conducted February 22, 2021. The lending test was rated Satisfactory and community development test was rated Outstanding.



## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Andover's overall CRA performance is rated Outstanding. Andover's performance is rated Outstanding in Ohio and Pennsylvania.

Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

### LENDING TEST

Andover's performance relative to the lending test is rated Satisfactory based on Andover's loan-to-deposit ratio, AA concentration, and borrower and geographic distribution. Andover's lending test performance is rated Satisfactory in Ohio and Pennsylvania.

#### Net Loan-to-Deposit Ratio

A financial institution's net loan-to-deposit (NLTD) ratio is evaluated to determine the reasonableness of lending in light of performance context, such as Andover's capacity to lend, the availability of lending opportunities, and the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions (custom peer group). The custom peer group was selected based on asset size, market share, and the area where they are located.

Comparative Loan-to-Deposit (LTD) Ratio		
Institution	Total Assets as of 12/31/2023 \$(000)	NLTD Ratio (%)
		16 – Quarter Average*
Andover Bank	\$558,768	52.8
<b>Similarly Situated Institutions</b>	<b>\$(000)</b>	<b>Custom Peer Ratio</b>
First Federal Savings & Loan of Lorain	\$530,037	77.1
Genoa Banking Company	\$600,140	84.5
Portage Community Bank	\$500,602	74.1
<b>Quarterly LTD Ratio Average Since the Previous Evaluation</b>		<b>78.6</b>
* March 31, 2020 - December 31, 2023		

During this period of time, Andover's NLTD ratio averaged 52.8%, compared to the peer ratio at 78.6%. According to bank management, their LTD ratio is below the peer banks because Andover is primarily a retail lender that takes in a significant number of deposits and primarily originates mortgage loans. Since the previous evaluation, Andover experienced a steady growth of total deposits and a decrease in lending as a result of the high-interest rate environment and reduced lending opportunities. Given these factors, Andover's NLTD ratio is considered reasonable.

### Assessment Area Concentration

During the evaluation period, Andover's lending was analyzed to determine the volume of lending inside and outside the AA. A majority of loans and other lending-related activities are in the AA.

#### Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Consumer	55	91.7	\$613	87.9	5	8.3	\$85	12.1
<b>Total Consumer related</b>	<b>55</b>	<b>91.7</b>	<b>\$613</b>	<b>87.9</b>	<b>5</b>	<b>8.3</b>	<b>\$85</b>	<b>12.1</b>
Home Purchase - Conventional	131	86.8	\$19,298	83.1	20	13.2	\$3,917	16.9
Refinancing	170	86.3	\$17,304	80.5	27	13.7	\$4,193	19.5
Home Improvement	109	94.0	\$5,398	92.1	7	6.0	\$461	7.9
Multi-Family Housing	5	71.4	\$3,640	64.5	2	28.6	\$2,000	35.5
Other Purpose Closed-End	63	88.7	\$3,968	80.0	8	11.3	\$993	20.0
<b>Total HMDA related</b>	<b>478</b>	<b>88.2</b>	<b>\$49,608</b>	<b>81.1</b>	<b>64</b>	<b>11.8</b>	<b>\$11,564</b>	<b>18.9</b>
Home Equity	58	86.6	\$4,631	84.2	9	13.4	\$871	15.8
<b>Total Non-HMDA related</b>	<b>58</b>	<b>86.6</b>	<b>\$4,631</b>	<b>84.2</b>	<b>9</b>	<b>13.4</b>	<b>\$871</b>	<b>15.8</b>
<b>TOTAL LOANS</b>	<b>591</b>	<b>88.3</b>	<b>\$54,852</b>	<b>81.4</b>	<b>78</b>	<b>11.7</b>	<b>\$12,520</b>	<b>18.6</b>

Note: Affiliate loans not included

Of the bank's total lending from January 1, 2022, to December 31, 2023, 88.3% by volume and 81.4% by dollar amount were made inside the AA.

### Lending to Borrowers of Different Income Levels

This performance criterion evaluates the bank's lending to borrowers of different income levels. Andover has reasonable penetration among individuals of different income (including LMI) levels. Borrower distribution is reasonable in Ohio and Pennsylvania.

### **Geographic Distribution of Loans**

This performance criterion evaluates the bank's distribution of lending within its AAs by tract income level with consideration given to the dispersion of loans throughout the AAs.

Andover's geographic distribution of loans reflects excellent dispersion throughout the AAs. Geographic distribution in Ohio is excellent and reasonable in Pennsylvania.

### **Response to Complaints**

Neither Andover nor this Reserve Bank has received any CRA-related complaints since the previous examination.

### **COMMUNITY DEVELOPMENT TEST**

Andover's performance relative to the community development test is rated Outstanding.

Andover's community development performance demonstrates an excellent responsiveness to community development needs in Ohio and Pennsylvania.

Andover facilitated 124 PPP loans totaling \$3.7 million through the U.S. government's Paycheck Protection Program (PPP) between February 23, 2021, through May 21, 2021, to help small businesses impacted by the COVID-19 emergency. Consistent with information provided in the May 27, 2020, joint statement on CRA Consideration for Activities in Response to Coronavirus FAQs,<sup>3</sup> PPP loans originated in LMI tracts may be considered in the community development test. PPP loans were originated outside of the evaluation period for the retail lending test.

Andover's community development performance demonstrates excellent responsiveness to community development needs in its AAs. Andover's community development activities helped revitalize and stabilize LMI communities through loans to a municipality and commercial building operator and PPP loans to small businesses. Community development activities also support services to LMI individuals and families and economic development initiatives. Since the previous evaluation, Andover significantly increased its levels of non-PPP community development lending. Community contacts emphasized the need for financial literacy education, wraparound services for LMI individuals and families, assistance and access to microloans for

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<sup>3</sup> [May 27 2020 - Frequently Asked Questions \(FAQs\) for Consideration for Activities in Response to the Coronavirus](#)

small businesses, and redevelopment of vacant and/or blighted properties. The majority of community development activities supported these expressed needs.

### *Community Development Lending*

Andover originated 24 community development loans totaling \$7.5 million. The following table shows the total number of community development loans by purpose, number and dollar amount.

CD Loan Purpose	#	\$
Revitalization / Stabilization	24	\$7,473,356
<b>Total</b>	<b>24</b>	<b>\$7,473,356</b>

Andover originated 19 PPP loans (79.2%) totaling \$952,154 (12.7%) that benefited small businesses in moderate-income geographies across its AAs. The five remaining community development loans totaling \$6.5 million helped to revitalize/stabilize moderate-income geographies in Nonmetropolitan Ohio and the Erie AA.

The largest concentration of community development loans by dollar amount benefited Ohio, accounting for 69.6% of total loans. The remaining 30.4% benefited Pennsylvania.

### *Community Development Investments*

Andover's qualified investments were in the form of small dollar donations. Andover made 109 donations totaling \$144,384 to 47 organizations. The following table shows the total number of qualified donations by purpose, number, and dollar amount.

CD Donation Purpose	#	\$
Services to LMI	63	\$86,354
Economic Development	35	\$48,900
Revitalization / Stabilization	11	\$9,130
<b>Total</b>	<b>109</b>	<b>\$144,384</b>
<i>*Includes donations that benefit the broader regional area</i>		

The majority of the contributions supported organizations that provide wraparound services to LMI individuals and families, followed by organizations that support economic development initiatives across Andover's AAs.

The largest concentration of qualified donations by dollar amount benefited Ohio, accounting for 86.1% of total donations; this includes five donations totaling \$4,100 (2.8%) that benefited the broader regional area in Ohio. The remaining 13.9% benefited Pennsylvania.

### *Community Development Services*

During the evaluation period, 36 employees provided 2,328 hours of community development services supporting various service activities to 51 organizations throughout its AAs. The following table provides a breakdown of qualified community development services by community development purpose, services, organizations, employees, and hours.

CD Service Purpose	# Services	# Orgs*	# Employees*	# Hours
Services to LMI	86	27	22	1,457
Economic Development	39	21	11	716
Revitalization/Stabilization	6	2	2	95
Affordable Housing	1	1	1	60
<b>Total</b>	<b>132</b>	<b>51</b>	<b>36</b>	<b>2,328</b>
<i>*Organizations/employees may be double counted if multiple employees help the same organization or an employee provides more than one service</i>				
<i>Includes services that benefit broader statewide/regional area</i>				

Andover's officers and staff members primarily provided their financial expertise by serving on boards and committees (1,851 hours), followed by providing technical expertise (434 hours) and financial literacy (43 hours). Community development services primarily support services to LMI individuals and families and economic development initiatives. Total community development hours equate to 1.2 annualized persons (ANP).<sup>4</sup>

The majority of community development services benefited Ohio, accounting for 74.5% of total hours, including 176 hours (7.6%) that benefited the broader regional area in Ohio and 74 hours (3.2%) that benefited the broader Ohio statewide area. The remaining 25.5% of community development service hours benefited Pennsylvania.

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<sup>4</sup> Annualized Persons (ANP): Number CD qualified service hours divided by 2,000 work hours in year.

Community development services included the following:

Board and Committee Memberships – Andover’s officers and managers provided financial expertise through their involvement with community development organizations throughout the AAs by serving as board directors, loan committee members, or treasurers.

Technical Assistance – Employees provided technical assistance which included fundraising, policy development for a hospital that serves an LMI community, Small Business Administration (SBA) loan disbursements, grant advisory services, and college aid services to LMI families and students.

Financial Education – Andover’s bank officers and employees worked with a variety of community service organizations through its AA during the evaluation period. Bank employees provided financial literacy training to LMI school-age children and families.

Andover provides financial literacy training using a mix of proprietary and third-party training materials that cover the following topics:

- Types of bank accounts
- How to recognize and avoid scams
- ABC’s of credit
- Recognizing counterfeiting
- What is credit history
- Investing essentials (saving and investing)
- Home ownership

During the COVID-19 emergency, Andover’s employees did not conduct in-person events due to the transition to virtual learning as well as social distancing guidelines that were in place. Post-pandemic, Andover returned to providing in-person financial literacy training. Andover also offers aspects of financial literacy through its Workplace Banking Program (lunch and learn type sessions) and on its website.

### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The Federal Reserve Bank of Cleveland conducted a fair lending analysis performed under Regulation B – Equal Credit Opportunity Act and Fair Housing Act requirements and was conducted concurrently with this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

## STATE OF OHIO

### CRA RATING for State of Ohio<sup>5</sup>: **Outstanding**

The Lending Test is rated: **Satisfactory**

The Community Development Test is rated: **Outstanding**

The major factors and criteria contributing to this rating include:

- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including LMI);
- The geographic distribution of loans reflects an excellent dispersion throughout the AA; and,
- The bank's community development performance demonstrates an excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

## SCOPE OF EXAMINATION

A full-scope review was conducted for Nonmetropolitan Ohio and a limited-scope review was conducted for the Cleveland-Elyria MSA. The time period and products evaluated for these AAs are consistent with the scope discussed in the Scope of Examination section of this report.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN OHIO

Lending in Ohio accounted for 69.7% of Andover's total lending activity, and deposits accounted for 88.0% of Andover's total deposits. As of June 30, 2023, the FDIC Deposit Market Share Report ranks Andover 61<sup>st</sup> among 199 insured institutions in Ohio with a deposit market share of 0.1%;

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<sup>5</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.



## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OHIO

### LENDING TEST

Andover's performance relative to the lending test in Ohio is rated Satisfactory.

#### **Borrower and Geographic Distribution**

The penetration of loans among borrowers of different income levels is reasonable. Borrower distribution is reasonable in Nonmetropolitan Ohio and the Cleveland-Elyria AA.

The geographic distribution of loans is excellent with a low level of lending gaps. The geographic distribution is excellent in Nonmetropolitan Ohio and reasonable in the Cleveland-Elyria AA.

### COMMUNITY DEVELOPMENT TEST

Andover's performance relative to the community development test in Ohio is rated Outstanding. Andover's community development performance demonstrates excellent responsiveness to community development needs of its AA through community development loans, qualified donations, and community development services, considering Andover's capacity and the need and availability of such opportunities.

Andover's community development performance demonstrates excellent responsiveness in Nonmetropolitan Ohio and poor responsiveness in the Cleveland-Elyria AA.

#### ***Community Development Loans***

Andover originated 20 community development loans totaling \$5.2 million in Ohio, representing 69.6% of total community development lending by dollar amount. Of these loans, four loans totaling \$4.3 million helped revitalize/stabilize a community that serves moderate-income geographies in Nonmetropolitan Ohio, and 16 were PPP loans totaling \$923,674 that benefited small businesses in moderate-income geographies in Nonmetropolitan Ohio and the Cleveland-Elyria AA. PPP loans represent 17.8% of total lending by dollar amount in Ohio.

The majority of community development lending in Ohio occurred in Nonmetropolitan Ohio, accounting for 69.5% of total community development lending by dollar amount. Andover only originated one PPP loan totaling \$4,333 in the Cleveland-Elyria AA, accounting for 0.1% of total community development lending by dollar amount.

### *Community Developments Investments*

Andover made 83 small dollar donations totaling \$124,354 to 39 organizations, representing 86.1% of total donations by dollar amount. This total also includes donations that benefited the broader regional area.

Because Andover was responsive to community development needs in its AAs, consideration was given to five small dollar donations totaling \$4,100 in contiguous counties in the broader regional area. Four of these donations totaling \$4,000 supported scholarships for LMI college students. The remaining donation totaling \$100 supported economic development initiatives in a moderate-income community. These donations represent 2.8% of total qualified donations.

The majority of qualified donations benefited Nonmetropolitan Ohio, accounting for 82.5% of qualified donations. The remaining 0.8% of qualified donations benefited the Cleveland-Elyria AA.

### *Community Development Services*

During the evaluation period, 25 employees provided 97 community development services totaling 1,734 hours (74.5%) to 37 organizations in Ohio. Total community development hours in Ohio equate to 0.9 ANP. Total hours include community development services that benefited the broader statewide and regional areas in Ohio.

Andover's directors, officers, and staff members provided their financial expertise to the community by engaging in activities that promoted or facilitated services to LMI individuals, economic development, revitalization/stabilization, and affordable housing in Ohio.

Consideration was given to three community development services totaling 74 hours that benefited the broader statewide area, including the bank's AAs in Ohio. An employee provided technical expertise related to SBA 504 loan fund disbursements and another employee served on the board of a trade organization that helps community banks collaborate and focus on reinvesting in their local communities to best meet credit and community development needs.

These community development services support economic development and represent 3.2% of total service hours.

Because Andover was responsive to community development needs in its AAs, consideration was given to 13 community development services totaling 176 hours in contiguous counties in the broader regional area. These services were provided by four employees who served on boards and/or committees of a regional food bank, a community action council, and a local chamber of commerce. These organizations help LMI individuals and promote economic development. Another employee provided technical expertise by assessing eligibility requirements for potential LMI homeowners for a large affordable housing agency. These community development services represent 7.6% of total service hours.

The largest concentration of community development services benefited Nonmetropolitan Ohio, accounting for 61.9% of total community development service hours. The remaining 1.8% of service hours benefited the Cleveland-Elyria AA.

**NONMETROPOLITAN OHIO**  
*(Full-Scope Review)*

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN OHIO**

Nonmetropolitan Ohio consists of the entirety of Ashtabula County. Ashtabula County is in the northeastern most corner of Ohio and borders Lake Erie and Pennsylvania. The Census Bureau released new size and population data from the 2020 Census on August 12, 2021, as a result of these changes, the AA was comprised of the following tracts for this analysis. See Appendix B for an AA map and Appendix C for additional demographic data.

<b>Income Tract Designations</b>	
<b>Assessment Area: Nonmetropolitan Ohio</b>	
<b>Income Tract Level</b>	<b>2022-2023</b>
Low	0
Moderate	9
Middle	19
Upper	0
Unknown	1
<b>Total</b>	<b>29</b>

- Since the previous evaluation, the AA lost five middle-income tracts and gained two upper-income tracts. There were no changes to the number of low-, moderate-, or unknown-income tracts.
- Andover maintains its main office with an ATM and five branch offices with ATMs in Nonmetropolitan Ohio. The main office is in Andover in a middle-income tract. The bank has branches in Ashtabula, Austinburg, and Conneaut in moderate-income tracts. Andover's branches in Geneva and Jefferson are in middle-income tracts.
- The main office and all branches offer extended and weekend hours of service and drive-thru services. The bank has not opened or closed any branches in Nonmetropolitan Ohio since the previous evaluation.
- Distressed and underserved middle-income geographies are designated by the agencies<sup>6</sup> in accordance with interagency CRA regulations. The criteria for designating these areas are available on the Federal Financial Institutions Examination Council's (FFIEC)

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<sup>6</sup>The Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, and Office of the Comptroller

website.<sup>7</sup> There were no middle-income tracts designated as distressed due to poverty and unemployment in 2022 or 2023.

- As of June 30, 2023, the FDIC Deposit Market Share Report ranked Andover second among eight institutions operating in the AA with a 29.7% market share. The Huntington National Bank ranked first and holds a 32.0% market share. Deposits in Nonmetropolitan Ohio account for 79.3% of Andover's total deposits.
- The 2023 HMDA Peer Market data indicates Andover ranked third out of 149 HMDA reporters in the AA and originated 126 loans. First ranked The Huntington National Bank originated 337 loans and second ranked CrossCountry Mortgage, LLC originated 128 loans.
- The 2022 HMDA Peer Market data indicates Andover ranked third out of 168 HMDA reporters in the AA and originated 157 loans. First ranked The Huntington National Bank originated 412 loans and second ranked Rocket Mortgage, LLC originated 180 loans.
- Between 2022 and 2023, the total number of HMDA reporters in the AA declined by 11.3% and originated mortgage loans declined by 24.7% among these same HMDA reporters. Specifically, Andover's originated mortgage loans declined by 19.8% during this period.

### Community Contacts

Three community contact interviews were conducted as part of this evaluation to provide supplemental information regarding the area's credit needs and context to demographic and economic conditions of the local community. The first interview was with a representative from a technical school and career center that provides workforce development training to high school students and adults. The contact stated the lack of safe and affordable housing along with a lack of job opportunities and stagnant wages are significant issues in the area. The contact stated the school has experienced increased enrollment post-pandemic, highlighting the growing preference for career-focused education. The contact indicated there are opportunities for financial institutions to support financial literacy education for LMI students and families, because it is critical to creating long-term financial success.

The second interview was with a representative from a charitable organization that provides direct services and funding to area nonprofits addressing local needs. The contact stated Ashtabula County faces several economic challenges including a poverty rate that is higher than the state and national averages; approximately 22.0% of children in the county live below the poverty level, compared to 18.0% of children in Ohio. The contact stated the county lacks

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<sup>7</sup> [FFIEC – Distressed or Underserved nonmetropolitan middle-income geographies](#)

adequate resources to help all those in need. The workforce is shrinking because of the declining manufacturing sector, leading to job loss and rising food insecurity. There is an increasing demand for food and other emergency assistance programs. The contact said they partner with a few local financial institutions to provide financial literacy training to underserved LMI individuals. The contact indicated there are opportunities for financial institutions to support workforce development and Volunteer Income Tax Assistance (VITA) programs that help LMI families file taxes and claim Earned Income Tax Credit (EITC) benefits. There are also opportunities for banks to assist small business entrepreneurs who do not have access to traditional funding (i.e., microloans) and support business incubator programs and other initiatives focused on start-ups.

The third interview was with a representative from a local board of realtors. The contact stated there are opportunities for financial institutions to provide downpayment assistance and homebuyer education programs for LMI individuals and families. There are also opportunities for banks to partner with Community Development Financial Institutions (CDFIs) and participate in Community Development Block Grant (CDBG) programs. These types of public-private partnerships help expand economic opportunities, particularly for LMI individuals and communities.

<b>Population Change</b>			
<b>Assessment Area: Nonmetropolitan Ohio</b>			
<b>Area</b>	<b>2020 Population</b>	<b>2023 Population</b>	<b>Percent Change</b>
Ashtabula County	96,845	96,574	-0.3%
Ohio	11,799,448	11,785,935	-0.1%
<i>Source: 2019-2023 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census</i>			

- From 2020 through 2023 the AA experienced a 0.3% loss in population, compared to Ohio which experienced a 0.1% loss in population.
- 77.9% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- 19.2% of the population in the AA was 65 or older, compared to 16.9% in Ohio.
- The majority of the population (51.0%) was between the ages of 25 and 64, which is the prime-working age.
- AA population is aging and decreasing resulting in shrinking working population or lack

of labor supply and increasing demand for leisure and healthcare services.

- 31.1% of the AA's population reside in the AA moderate-income tracts.
- Ashtabula is the most populous city in the county with 17,722 residents in 2024; population decreased by 1.4% since 2020.<sup>8</sup>

**Borrower Income Levels  
Nonmetropolitan Ohio**

FFIEC Estimated Median Family Income		% Change	Low 0 - 49.99%		Moderate 50% - 79.99%		Middle 80% - 119.99%		Upper 120% - & above	
<b>2022</b>	<b>\$74,900</b>		0	- \$37,449	\$37,450	- \$59,919	\$59,920	- \$89,879	\$89,880	- & above
<b>2023</b>	<b>\$79,500</b>	6.1%	0	- \$39,749	\$39,750	- \$63,599	\$63,600	- \$95,399	\$95,400	- & above

- During the evaluation period, median family income (MFI) in Nonmetropolitan Ohio increased by 6.1%.
- 2020 MFI in Nonmetropolitan Ohio was \$58,452 which represents a 28.1% increase from 2020 to 2022 and a 36.0% increase from 2020 to 2023.
- Ohio's minimum wage increased on January 1, 2024, to \$10.45<sup>9</sup> per hour or \$21,736 annually, from \$10.10 per hour or \$21,008 annually, which is a 3.5% increase since 2023.
- The Federal minimum is \$7.25<sup>10</sup> per hour or \$15,080 annually and has not increased since 2009.

<b>Poverty Rates Assessment Area: Nonmetropolitan Ohio</b>		
<b>Area</b>	<b>2022</b>	<b>2023</b>
Ashtabula County	17.4%	17.8%
Ohio	13.4%	13.2%
<i>Source: Federal Reserve Economic Data (FRED)   Federal Reserve Bank of St. Louis</i>		

- Poverty rates in Ashtabula County were higher than poverty rates in Ohio in 2022 and 2023.
- Of the 24,537 families in AA, 44.3% are designated as LMI and 14.9% of families are living

<sup>8</sup> [U.S. Census Bureau Quick Facts - Ashtabula](#)

<sup>9</sup> [Ohio Minimum Wage](#)

<sup>10</sup> [Federal Minimum Wage](#)

below the poverty level, compared to 9.6% of families living below the poverty level in Ohio.

- Of the 38,614 households in the AA, 18.4% are below the poverty level and 2.6% receive public assistance; compared to 13.4% of households across Ohio that are below the poverty level.
- Supplemental Nutrition Assistance Program (SNAP)<sup>11</sup> helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

SNAP Recipients	
Assessment Area: Nonmetropolitan Ohio	
Area	2022
Ashtabula County	17.8%
Ohio	12.3%
Source: Federal Reserve Economic Data (FRED)   Federal Reserve Bank of St. Louis	

- The percentage of SNAP recipients in Ashtabula County is comparable with area poverty rates. The percentage of SNAP recipients and poverty rates were consistently higher in the AA compared to state levels during this period.

Housing Cost Change						
Assessment Area: Nonmetropolitan Ohio						
Area	Median Housing Value			Median Gross Rent		
	2020	2023	Percent Change	2020	2023	Percent Change
Ashtabula County	\$117,200	\$149,600	27.6%	\$706	\$816	15.6%
Ohio	\$151,400	\$199,299	31.6%	\$825	\$988	19.8%
Source: 2019-2023 U.S. Census Bureau: American Community Survey 2018-2022 U.S. Census Bureau: American Community Survey						

- Between 2020 to 2023, median housing values increased in Ashtabula County by 27.6%, compared to 31.6% in Ohio. MFI at 36.0% kept pace with home price growth. Overall, housing was mostly affordable across the AA during this period.

<sup>11</sup>[FRED Economic Data – SNAP Benefits Recipients Ohio](#)



- Based on 2020 Census data, the affordability ratio<sup>12</sup> was 40.4 in the AA, compared to 38.4 in Ohio. Housing was generally more affordable across the AA than in other parts of Ohio.
- Between 2020 and 2023, median gross rents in Ashtabula County increased 15.6%. MFI outpaced rent growth during this period.
- According to 2020 Census data, 45.8% of all renters across the AA have rental costs greater than 30.0% of income, compared to 40.9% of renters across Ohio. However, the increase in median gross rents indicates the need for more affordable housing in the AA.
- According to HUD's 2024 Fair Market Rent (FMR) data,<sup>13</sup> the average rent for a two-bedroom unit in Ashtabula County is \$860, which is an 8.3% increase from 2023.
- With Ohio's minimum wage at \$10.45, renters across Ohio can only afford \$543 in monthly rent. The typical minimum wage worker cannot afford rent for a FMR two-bedroom apartment or would have to work 82 hours a week to afford a modest two-bedroom apartment in Ashtabula County.
- According to the National Low Income Housing Coalition,<sup>14</sup> full time workers must earn at least \$20.81 per hour or \$43,284 annually to afford a 2-bedroom apartment with an average rent of \$1,082/month in Ohio, which is double the minimum wage in the state. Rents continue to increase nationwide; the national average rent in 2024 is \$1,670 requiring workers to earn a minimum wage of \$32.11 per hour or \$66,789 annually to afford a modest two-bedroom rental home.<sup>15</sup>
- There are 46,224 housing units in Ashtabula County, of which 59.7% are owner-occupied units, 23.8% are rental units and 16.5% are vacant. Housing units in Ashtabula primarily consist of single-family (92.3%) homes.
- The median age of housing stock in Ashtabula County is 61 years old with 36.8% of housing built prior to 1950. The age of housing stock across the county demonstrates a potential need for home improvement lending and refinance or home improvement loans to remove lead-based paint that was commonly used in houses and apartments built before 1978.<sup>16</sup>

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<sup>12</sup> The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

<sup>13</sup> [2024 FMR - Ashtabula County](#)

<sup>14</sup> [National Low Income Housing Coalition](#)

<sup>15</sup> [National Low Income Housing Coalition – National Average FMR](#)

<sup>16</sup> [Ohio Health Homes and Lead Poisoning Prevention Program](#)

Housing Cost Burden Assessment Area: Nonmetropolitan Ohio						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Ashtabula County	61.8%	20.8%	17.3%	71.4%	22.8%	43.7%
Ohio	60.4%	27.2%	16.1%	71.7%	27.0%	38.6%
<i>Cost Burden is housing cost that equals 30 percent or more of household income</i> <i>Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy</i>						

- 61.8% of low-income homeowners and 71.4% of low-income renters in Ashtabula County are cost burdened, compared to 20.8% of moderate-income homeowners and 22.8% of moderate-income renters in the county.
- 17.3% of all homeowners and 43.7% of all renters across the AA are cost burdened, compared to 16.1% of all homeowners and 38.6% of all renters across Ohio.
- This data shows cost burden disproportionately affects renter-occupied households, particularly low-income renters as well as low-income homeowners.
- Cost-burdened renters may have a difficult time saving enough money to make a sufficient downpayment to purchase a home or otherwise afford increasing rents.
- There is a growing disparity between median family incomes and escalating housing and rental costs, leading to increased financial strain on residents in Ashtabula County.

Unemployment Rates Assessment Area: Nonmetropolitan Ohio					
Area	2019	2020	2021	2022	2023
Ashtabula County	4.8%	8.3%	5.6%	4.4%	4.0%
Ohio	4.2%	8.2%	5.1%	4.0%	3.5%
<i>Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics</i>					

- Between 2019 and 2020, unemployment rates increased significantly in response to the COVID-19 pandemic. Unemployment rates in Ashtabula County were higher than unemployment rates in Ohio during this period. While unemployment rates rebounded in 2023, unemployment rates remained higher than rates in Ohio.
- According to Ohio Office of Research:<sup>17</sup>
  - Land use is primarily rural with only 11.4% available for urban (i.e., residential, commercial, industrial, or recreational) development.

<sup>17</sup>[Ohio County Trends](#)

- The leading industries are manufacturing; education and health services, trade, transportation, and utilities; local government; and leisure and hospitality.
- The average private sector weekly wage at \$861 indicates employed persons can afford the median rent of \$816.
- Major employers include Ashtabula County government, Ashtabula Area City Schools, Ashtabula County Medical Center, General Aluminum Manufacturing Company, KraftMaid Cabinetry, Premix Incorporated, and University Hospitals – Conneaut.
- Based on the 2021 Broadband Ohio report,<sup>18</sup> 65.0% of the populated area and 32.0% of households do not have access to minimum broadband enabled internet. Nationally, those with access to broadband-enables computers are employed at a higher rate in urban and rural counties.

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<sup>18</sup>[Broadband Ohio - Ashtabula County Profile](#)

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN OHIO

### LENDING TEST

The lending test performance in Nonmetropolitan Ohio is reasonable.

HMDA lending received the most weight, followed by home equity and consumer lending, respectively in Nonmetropolitan Ohio.

#### **Lending to Borrowers of Different Income Levels**

Borrower distribution received more weight than geographic distribution based on the higher percentage of LMI families compared to LMI geographies in Nonmetropolitan Ohio.

Andover's lending penetration among borrowers of different income (including LMI) levels in Nonmetropolitan Ohio is considered reasonable. Borrower distribution is reasonable for HMDA and home equity loans and excellent for consumer loans. See Appendix D for specific lending-related data.

#### ***HMDA Lending***

HMDA loans are comprised of home purchase, refinance, home improvement, other purpose closed end, and multi-family loans. See Appendix D for explicit HMDA lending data. Andover's performance was compared to the percentage of families (proxy) and the aggregate lending data.

During the evaluation period, Andover originated 283 HMDA loans totaling \$29.9 million, and seven (2.5%) were made to borrowers with unknown-income designations. Andover made 0.6% of loans to borrowers with unknown incomes, compared to the aggregate lending performance at 12.6% in 2022. The bank made 4.8% of loans to borrowers with unknown incomes, compared to the aggregate lending performance at 13.1% in 2023.

Andover originated 33 (11.7%) HMDA loans to low-income borrowers, which was significantly below proxy at 24.3%. The bank's performance at 12.1% exceeded aggregate lending performance at 11.5% in 2022 and at 11.1% fell slightly below aggregate lending performance at 12.4% in 2023. Andover originated 70 (24.7%) HMDA loans to moderate-income borrowers, which exceeded proxy at 20.0%. The bank's performance at 26.8% exceed aggregate lending performance at 25.4%

in 2022 and at 22.2% fell slightly below aggregate lending performance at 27.1% in 2023.

Considering these factors along with the increase in home prices, high percentage of low-income cost burdened renters, and poverty rates, borrower distribution of HMDA lending to low-income borrowers is reasonable and excellent to moderate-income borrowers.

### Home Equity Lending

Andover originated 37 home equity loans totaling \$2.7 million. Andover's performance was compared to the percentage of families (proxy).

#### Borrower Distribution of Home Equity Loans

Assessment Area: Nonmetropolitan Ohio

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	4	10.8%	173	6.4%	24.3%
Moderate	9	24.3%	440	16.3%	20.0%
Middle	9	24.3%	769	28.5%	23.7%
Upper	15	40.5%	1,312	48.7%	32.0%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>37</b>	<b>100.0%</b>	<b>2,695</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Andover originated four (10.8%) home equity loans to low-income borrowers, which was significantly below proxy at 24.3%. Andover originated nine (24.3%) home equity loans to moderate-income borrowers, which was slightly above proxy at 20.0%.

Borrower distribution of home equity loans to low-income borrowers is poor and excellent to moderate-income borrowers.

### Consumer Lending

During the evaluation period, Andover originated 45 consumer loans totaling \$518,000. Andover's performance was compared to the households by income (proxy).

#### Borrower Distribution of Consumer Loans

Assessment Area: Nonmetropolitan Ohio

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households by Household Income
	#	%	\$ (000s)	\$ %	%
Low	14	31.1%	82	15.8%	28.6%
Moderate	17	37.8%	151	29.2%	17.0%
Middle	8	17.8%	134	25.9%	18.8%
Upper	6	13.3%	152	29.3%	35.5%
Unknown	0	0.0%	0	0.0%	
<b>Total</b>	<b>45</b>	<b>100.0%</b>	<b>518</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Andover originated 14 (31.1%) consumer loans to low-income borrowers, which exceeded proxy at 28.6%. Andover originated 17 (37.8%) consumer loans to moderate-income borrowers, which significantly exceeded proxy at 17.0%.

Considering access to transportation is essential for improving upward social mobility for lower-income individuals and communities, borrower distribution of consumer loans to LMI borrowers is excellent.

### Geographic Distribution of Loans

Andover's geographic distribution reflects an excellent dispersion of loans in Nonmetropolitan Ohio. The geographic distribution of HMDA and consumer lending is excellent and home equity lending is reasonable. Andover has a low level of lending gaps.

### Lending Penetration

	Nonmetropolitan Ohio - 2022				Nonmetropolitan Ohio - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	0	0	0	No Tracts	0	0	0	No Tracts
Moderate	9	0	9	100.0%	9	0	9	100.0%
Middle	19	0	19	100.0%	19	0	19	100.0%
Upper	0	0	0	No Tracts	0	0	0	No Tracts
Unknown	1	1	0	0.0%	1	1	0	0.0%
<b>Total</b>	<b>29</b>	<b>1</b>	<b>28</b>	<b>96.6%</b>	<b>29</b>	<b>1</b>	<b>28</b>	<b>96.6%</b>

Andover penetrated 96.6% of its total tracts during the evaluation period, which is a low level of lending gaps. Andover penetrated 100.0% of moderate-income tracts. The penetration rate reflects Andover's major presence in this market.

### *HMDA Lending*

During the evaluation period, Andover originated 283 HMDA loans totaling \$29.9 million. Andover's performance was compared to the percentage of owner-occupied units (proxy) and the aggregate lending data.

Andover originated 81 (28.6%) HMDA loans in moderate-income tracts, which exceeded proxy at 27.9%. The bank's performance at 27.4% exceeded aggregate lending performance at 26.3% in 2022 and at 30.2% exceeded the aggregate lending performance at 27.5% in 2023. Geographic distribution of HMDA loans in moderate-income tracts is excellent.

### *Home Equity Lending*

Andover originated 37 home equity loans totaling \$2.7 million. Andover's performance was compared to the percentage of owner-occupied units (proxy).

### Geographic Distribution of Home Equity Loans

Assessment Area: Nonmetropolitan Ohio

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Owner Occupied Units
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	9	24.3%	738	27.4%	27.9%
Middle	28	75.7%	1,957	72.6%	72.1%
Upper	0	0.0%	0	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	37	100%	2,695	100%	100.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Andover originated nine (24.3%) home equity loans in moderate-income tracts, which was slightly below proxy at 27.9%. Geographic distribution of home equity loans in moderate-income tracts is reasonable.

### Consumer Lending

During the evaluation period Andover originated 45 consumer loans totaling \$518,000. Andover's performance was compared to the percentage of households by tract income (proxy).



### Geographic Distribution of Consumer Loans

Assessment Area: Nonmetropolitan Ohio

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	19	42.2%	212	40.9%	31.8%
Middle	26	57.8%	306	59.1%	68.2%
Upper	0	0.0%	0	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	45	100%	518	100%	100.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Andover originated 19 (42.2%) consumer loans in moderate-income tracts, which significantly exceeded proxy at 31.8%. Geographic distribution of consumer loans in moderate-income tracts is excellent.

### COMMUNITY DEVELOPMENT TEST

Andover's community development performance demonstrates excellent responsiveness to community development needs of Nonmetropolitan Ohio, particularly to area businesses impacted by the COVID-19 emergency through community development loans. Andover's community development activities helped revitalize and stabilize moderate-income communities through loans to a municipality and PPP loans to small businesses. Community development activities also support services to LMI individuals and families and economic development initiatives. Since the previous evaluation, Andover significantly increased its levels of non-PPP community development lending. The contact emphasized the need for financial literacy education, wraparound services for LMI individuals and families, and assistance and access to microloans for small businesses. The majority of community development activities supported these expressed needs.

### *Community Development Lending*

Andover originated 19 community development loans totaling \$5.2 million in Nonmetropolitan Ohio. The following table shows the total number of community development loans by purpose, number and dollar amount.

CD Loan Purpose	#	\$
Revitalization / Stabilization	19	\$5,194,293
<b>Total</b>	<b>19</b>	<b>\$5,194,293</b>

#### **Revitalization / Stabilization**

- A loan totaling \$3.0 million to a municipality to fund construction of a new fire station in a township that serves a moderate-income geography.
- Two loans totaling \$774,952 to a municipality to purchase two fire trucks for a township that serves a moderate-income geography.
- A loan totaling \$500,000 to a private school to expand and renovate its building in a township that serves a moderate-income geography. The improvements to the school are projected to attract more dollars and provide economic benefits to the area.
- 15 PPP loans totaling \$919,341 to small businesses in moderate-income geographies. These loans helped these businesses maintain payroll and avoid layoffs during the height of the COVID-19 emergency.

### *Community Development Investments*

Andover's qualified investments were in the form of small dollar donations. Andover made 75 donations totaling \$119,119 to 34 organizations. The following table shows the total number of qualified donations by purpose, number, and dollar amount.

CD Donation Purpose	#	\$
Services to LMI	37	\$61,839
Economic Development	27	\$48,150
Revitalization / Stabilization	11	\$9,130
<b>Total</b>	<b>75</b>	<b>\$119,119</b>

Donations include:

**Services to LMI**

- Four donations totaling \$55,500 to a large charity. Donations were targeted toward services that help LMI individuals and families and promote financial security across the county.
- Four donations totaling \$1,000 to two organizations that provide medical care for those in need.
- Two donations totaling \$730 to food bank/programs that help LMI people and veterans struggling with food insecurity.

**Economic Development**

- Three donations totaling \$18,000 to a development corporation to support economic and community development initiatives in a moderate-income area.
- Three donations totaling \$15,000 to a growth partnership that promotes economic and community development initiatives across the county.
- A donation totaling \$10,000 to a nonprofit dedicated to promoting the redevelopment of business districts in the county.

**Revitalization/Stabilization**

- Four donations totaling \$7,000 to community hospital that serves a moderate-income area.
- Three donations totaling \$1,300 to an organization holding a fundraiser to provide emergency and wraparound services to those in need in a moderate-income community.

**Community Development Services**

During the evaluation period, 20 employees assisted 26 organizations, and provided 76 community development services totaling 1,442 hours as shown in the table below.

CD Service Purpose	# Services	# Orgs*	# Employees*	# Hours
Services to LMI	52	15	13	1,037
Economic Development	20	13	6	358
Revitalization/Stabilization	4	1	1	47
<b>Total</b>	<b>76</b>	<b>29</b>	<b>20</b>	<b>1,442</b>
<i>*Organizations/employees may be double counted if multiple employees help the same organization or an employee provides more than one service</i>				

Employees were involved with organizations and activities that promote community services targeted to LMI individuals, economic development, and to a lesser extent, revitalization and stabilization. Bank officers and employees worked with a variety of community service organizations throughout the AA during the evaluation period. Most of Andover's community development services are provided through serving on boards and committees (1,137 hours) followed by providing technical assistance (276 hours) and financial literacy training (29 hours). Service hours equate to 0.7 ANP.

#### **Membership on Boards/Committees**

- 13 employees serve on boards of 12 organizations that promote economic development initiatives at the county and municipal levels.
- Seven employees serve on boards of eight organizations that provide various wraparound services to LMI individuals and families.
- One employee serves on a board of a foundation that works to support green space development in LMI communities.

#### **Technical Expertise**

- An employee helped review grant applications for economic development projects in the county.
- An employee assisted a nonprofit with fundraising campaigns.
- An employee helped develop policies and procedures for two area hospitals in a medically underserved area (Ashtabula County).
- An employee assisted LMI students and families navigate the process of applying for financial aid for college.
- An employee helped a nonprofit thrift store secure financial assistance.

#### **Financial Literacy**

- Two employees partnered with a vocational school to provide financial literacy education to adults enrolled in workforce development program(s).
- An employee partnered with Junior Achievement to provide financial literacy education to LMI middle-school students.
- Two employees provided money management and homebuyer education to LMI workers at a local manufacturing company.
- Four employees partnered with a local church to provide financial literacy and homebuyer education to LMI individuals.

**METROPOLITAN AREA**  
*(Limited-scope Review)*

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN OHIO**

- **Cleveland-Elyria MSA**
  - As of December 31, 2023, Andover operated one branch in the AA, representing 10.0% of total branches and 14.3% of branches in Ohio.
  - As of June 30, 2023, Andover had \$46.5 million in deposits in this AA, representing a market share of 0.5% and 8.8% of total deposits and 10.0% of deposits in Ohio.

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

Through the use of available facts and data, including performance and demographic information, each AA's performance was evaluated and compared with Andover's performance in the state. The conclusions regarding performance are provided in the tables below. Please refer to the tables in Appendix A for information regarding these areas.

Assessment Area	Lending Test	Community Development Test
Cleveland-Elyria MSA	Consistent	Below
<i>The performance in the limited-scope AA did not impact the overall state rating.</i>		

For the lending test, Andover received a Satisfactory rating in Ohio. Performance in this AA was consistent with Andover's performance for the state. The borrower and geographic distribution is reasonable for HMDA lending. There was insufficient loan volume to evaluate home equity and consumer lending in this AA.

For the community development test, Andover received an Outstanding rating in Ohio. Community development in this AA was below Andover's performance for the state. The weaker performance was primarily due to a low level of community development activities which is commensurate with Andover's limited operational presence in this competitive market.

## COMMONWEALTH OF PENNSYLVANIA

### CRA RATING for Commonwealth of Pennsylvania<sup>19</sup>: **Outstanding**

The Lending Test is rated: **Satisfactory**

The Community Development Test is rated: **Outstanding**

The major factors and criteria contributing to this rating include:

- The distribution of loans to borrowers reflects reasonable penetration among individuals of different income levels (including LMI);
- The geographic distribution of loans reflects a reasonable dispersion throughout the AA; and,
- Community development performance demonstrates an excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

## SCOPE OF EXAMINATION

A full-scope review was conducted for the Erie CSA, Andover's only AA in Pennsylvania. The time period and products evaluated for these AAs are consistent with the scope discussed in the Scope of Examination section of this report.

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<sup>19</sup>For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

**METROPOLITAN AREA**  
(Full-Scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN ERIE-MEADVILLE, PA CSA #240**

The Erie CSA is comprised of the Erie MSA and the entirety of Crawford County in Nonmetropolitan Pennsylvania. The Erie MSA is comprised of the entirety of Erie County. Andover's AA includes portions of Erie and Crawford counties. The Census Bureau released new size and population data from the 2020 Census on August 12, 2021, as a result of these changes, the AA was comprised of the following tracts for this analysis. See Appendix B for an AA map and Appendix C for additional demographic data.

Income Tract Designations Assessment Area: Erie-Meadville, PA CSA		
Income Tract Level	Erie, PA MSA (Erie County)	Nonmetropolitan Pennsylvania (Crawford County)
	2022-2023	2022-2023
Low	9	0
Moderate	15	0
Middle	22	7
Upper	17	1
Unknown	2	0
<b>Total</b>	<b>65</b>	<b>8</b>
<b>Grand Total</b>	<b>73 tracts</b>	

- Since the previous evaluation, the AA lost two low- and five middle-income tracts and gained six moderate-, two upper-, and one unknown-income tract. No middle-income tracts in Crawford County were designated as distressed or underserved in 2022 or 2023, as defined annually by regulatory agencies.<sup>20</sup>
- Andover maintains three branch offices with ATMs in the Erie AA. Andover has a branch in Millcreek in a middle-income tract and branches in Albion and Edinboro in moderate-income tracts. All three branches offer extended hours and weekend and drive-thru services. The bank has not opened or closed any branches in this AA since the previous evaluation.
- As of June 30, 2023, the FDIC Deposit Market Share Report ranks Andover ninth among

<sup>20</sup>[FFIEC – Distressed or Underserved nonmetropolitan middle-income geographies](#)

11 institutions operating in the AA with a 0.9% market share; compared to the three largest market holders. PNC Bank National Association Bank ranks first and holds a 31.1% market share, Northwest Bank ranks second with a 18.1% market share, and First National Bank of Pennsylvania ranks third with 18.0% of market share. Deposits in the AA account for 12.0% of Andover's total deposits.

- The 2023 HMDA Peer Market data indicates Andover ranks 20<sup>th</sup> out of 191 HMDA reporters in the Erie MSA and originated 38 loans. First ranked Marquette Savings Bank originated 497 loans, and second ranked Erie Federal Credit Union originated 421 loans.
- The 2023 HMDA Peer Market data indicates Andover ranks 10<sup>th</sup> out of 67 HMDA reporters in Crawford County and originated 11 loans. First ranked Marquette Savings Bank originated 89 loans and second ranked First National Bank of Pennsylvania originated 38 loans.
- The 2022 HMDA Peer Market data indicates Andover ranks 17<sup>th</sup> out of 199 HMDA reporters in the Erie MSA and originated 85 loans. First ranked Northwest Bank originated 723 loans, and second ranked Marquette Savings Bank originated 511 loans.
- The 2022 HMDA Peer Market data indicates Andover ranks seventh out of 77 HMDA reporters in Crawford County and originated 24 loans. First ranked Marquette Savings Bank originated 90 loans, and second ranked Northwest Bank originated 56 loans.
- Between 2022 and 2023, the total number of HMDA reporters in the AA declined by 6.5% and originated mortgage loans declined by 24.3% among these same HMDA reporters. Specifically, Andover's originated mortgage loans declined by 55.0%.

### **Community Contacts**

Three interviews were conducted with community contacts to provide additional information regarding the AA. The first contact was a representative from the Chamber of Commerce which focuses on business advocacy and economic development in several municipalities in Erie County. The contact stated there are limited financial institutions in the community making it challenging for consumers and business owners to access safe and affordable financial services. This can lead to a reliance on high-cost, alternative credit options. Many residents face barriers to homeownership and business expansion due to limited available financing options. The contact indicated there are opportunities for financial institutions to offer affordable, small dollar loans; down payment assistance programs for first-time homebuyers; and offer financial literacy and education to help empower LMI individuals to make informed decisions and understand the benefits of banking services. The contact also indicated there is a need to improve broadband infrastructure to boost business development and increase job creation.



The second interview was with a local nonprofit dedicated to addressing poverty and financial instability in Erie. The contact stated Erie is facing significant economic challenges including high levels of poverty and food insecurity and a lack of affordable housing. The contact noted unemployment and underemployment are issues leaving many households unable to meet basic financial obligations. The contact indicated there are opportunities for financial institutions to partner with their organization to help LMI individuals open low-cost or no-cost checking accounts and help LMI and unbanked individuals with direct deposit enrollment to reduce the reliance on alternative financial services.

The third interview was with a redevelopment authority that acquires abandoned and tax-delinquent properties for redevelopment, assists LMI residents in obtaining safe housing, and works to attract new investments to Erie's distressed neighborhoods. The contact stated Erie has experienced economic decline due to deindustrialization, which has led to population loss and blighted properties, particularly in LMI neighborhoods. The contact indicated there is a critical need for affordable housing and economic revitalization. Erie is also experiencing issues with aging infrastructure and vacant properties, which presents challenges and opportunities for redevelopment. Considering the large number of dilapidated and vacant homes and blighted neighborhoods, the contact indicated there opportunities for financial institutions to invest in programs to address these issues. The contact also indicated there is a need for downpayment assistance and flexible mortgage rate options to make homeownership more accessible to LMI borrowers.

Population Change			
Assessment Area: Erie, PA CSA			
Area	2020 Population	2023 Population	Percent Change
Erie County	270,876	267,571	-1.2%
Crawford County	83,938	82,001	-2.3%
Pennsylvania	13,002,700	13,017,721	0.1%
Source: 2019-2023 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

- From 2020 through 2023 Erie County experienced a 12.0% loss in population and Crawford County experienced a 2.3% loss compared to Pennsylvania which experienced a 0.1% increase in population.
- 78.8% of the Erie County population and 79.0% of Crawford County was 18 years of age or older, the legal age to enter into a contract.

- 17.7% of the population in Erie County and 20.8% of the population in Crawford was 65 or older, compared to 18.0% in Pennsylvania.
- The majority of the population (51.2%) in Erie County and (53.1%) in Crawford County was between the ages of 25 and 64, which is the prime-working age.
- AA population is aging and decreasing resulting in shrinking working population or lack of labor supply and increasing demand for leisure and healthcare services.
- 26.5% of the Erie County population reside in LMI tracts.
- According to Census data, Erie is the most populous city in Erie County and fifth largest city in Pennsylvania,<sup>21</sup> with a population of 92,957 as of 2023, which is a decrease of 2.0% since 2020. Meadville is the most populous city in Crawford County, with a population of 12,361 in 2023, which is a 5.3% decrease since 2020.

**Borrower Income Levels  
Erie PA MSA**

FFIEC Estimated Median Family Income		% Change	Low		Moderate		Middle		Upper	
			0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2022	\$75,000		0	- \$37,499	\$37,500	- \$59,999	\$60,000	- \$89,999	\$90,000	- & above
2023	\$82,100	9.5%	0	- \$41,049	\$41,050	- \$65,679	\$65,680	- \$98,519	\$98,520	- & above

- During the evaluation period, MFI in the MSA increased by 9.5%.
- 2020 MFI in the MSA was \$68,789, representing a 9.0% increase from 2020 to 2022 and a 19.4% increase from 2020 to 2023.
- By comparison, in 2020 the MFI was \$68,789, which was 15.1% lower than MFI in Pennsylvania at \$80,996.
- Pennsylvania's minimum wage in 2023 was \$7.25<sup>22</sup> per hour or \$15,080 annually, which is the same as the Federal minimum wage<sup>7</sup>, which has not increased since 2009.

<sup>21</sup> [Largest Cities in Pennsylvania](#)

<sup>22</sup> [Commonwealth of Pennsylvania Minimum Wage Law](#)

**Borrower Income Levels  
Nonmetropolitan Pennsylvania**

FFIEC Estimated Median Family Income		% Change	Low 0 - 49.99%		Moderate 50% - 79.99%		Middle 80% - 119.99%		Upper 120% - & above	
<b>2022</b>	<b>\$72,900</b>		0	- \$36,449	\$36,450	- \$58,319	\$58,320	- \$87,479	\$87,480	- & above
<b>2023</b>	<b>\$77,800</b>	6.7%	0	- \$38,899	\$38,900	- \$62,239	\$62,240	- \$93,359	\$93,360	- & above

- During the evaluation period, MFI in Nonmetropolitan Pennsylvania increased by 6.7%.
- 2020 MFI in Nonmetropolitan Pennsylvania was \$65,202, representing a 11.8% increase from 2020 to 2022 and a 19.3% increase from 2020 to 2023.
- By comparison, 2020 MFI at \$65,202 was 19.5% lower than MFI in Pennsylvania at \$80,996.

<b>Poverty Rates Assessment Area: Erie, PA CSA</b>		
<b>Area</b>	<b>2022</b>	<b>2023</b>
Erie County	14.9%	14.5%
Crawford County	13.9%	12.6%
<b>Pennsylvania</b>	<b>11.8%</b>	<b>11.9%</b>
<i>Source: Federal Reserve Economic Data (FRED)   Federal Reserve Bank of St. Louis</i>		

- Poverty rates in Erie and Crawford counties were higher than poverty rates in Pennsylvania in 2022 and 2023.
- Of the 67,922 families in Erie County, 38.3% are designated as LMI and 10.4% of families are living below the poverty level, compared to 8.1% of families in Pennsylvania.
- Of the 22,963 families in Crawford County, 38.9% are designated as LMI and 8.2% of families are living below the poverty level.
- SNAP<sup>23</sup> helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

<sup>23</sup>[FRED Economic Data – SNAP Benefits Recipients Pennsylvania](#)

SNAP Recipients Assessment Area: Erie, PA CSA	
Area	2022
Erie County	20.8%
Crawford County	16.3%
Pennsylvania	14.6%
Source: Federal Reserve Economic Data (FRED)   Federal Reserve Bank of St. Louis	

- The percentage of SNAP recipients in Erie and Crawford counties is higher than area poverty rates. The percentage of SNAP recipients and poverty rates were consistently higher in the AA compared to state levels during this period.

Housing Cost Change Assessment Area: Erie, PA CSA						
Area	Median Housing Value			Median Gross Rent		
	2020	2023	Percent Change	2020	2023	Percent Change
Erie County	\$138,500	\$169,500	22.4%	\$770	\$876	13.8%
Crawford County	\$117,400	\$143,400	22.1%	\$676	\$800	18.3%
Assessment Area	\$85,973	\$104,974	22.3%	\$1,155	\$1,233	16.1%
Pennsylvania	\$187,500	\$240,500	28.3%	\$958	\$1,162	21.3%
Source: 2019-2023 U.S. Census Bureau: American Community Survey 2018-2022 U.S. Census Bureau: American Community Survey						

- Between 2020 to 2023, median housing values increased by 22.3% in the AA, compared to 28.3% in Pennsylvania. MFI at 19.4% did not keep pace with home price growth. Overall, housing was generally less affordable across the AA during this period.
- Based on 2020 Census data, the affordability ratio<sup>24</sup> was 38.2 in the MSA and 44.2 in Nonmetropolitan Pennsylvania, compared to 33.9 in Pennsylvania. Housing was generally more affordable across the AA than in other parts of Pennsylvania.
- Between 2020 and 2023, median gross rents increased between 16.1% in the AA, compared to 21.3% in Pennsylvania. MFI outpaced rent growth during this period.

<sup>24</sup> The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

- According to 2020 Census data, 45.2% and 33.9% of all renters in Erie and Crawford counties, respectively have rental costs greater than 30.0% of income, compared to 43.1% of renters across Pennsylvania. However, the increase in median gross rents indicates the need for more affordable housing in the AA.
- According to HUD's 2024 FMR data, the average rent for a two-bedroom unit in Erie County is \$983, which is a 3.8% increase from 2023.<sup>25</sup> The average rent for a two-bedroom unit in Crawford County is \$845, which is a 2.9% increase from 2023.<sup>26</sup>
- With Pennsylvania's minimum wage at \$7.25, renters across Pennsylvania can only afford \$377 in monthly rent. The typical minimum wage worker cannot afford rent for a FMR two-bedroom apartment or would have to work 136 hours a week to afford a modest two-bedroom apartment in Erie County and 117 hours a week to afford a modest two-bedroom apartment in Crawford County.
- According to the National Low Income Housing Coalition,<sup>27</sup> full time workers must earn at least \$26.26 per hour or \$54,620 annually to afford a 2-bedroom apartment with an average rent of \$1,365/month in Pennsylvania. Rents continue to increase nationwide; the national average rent in 2024 is \$1,670 requiring workers to earn a minimum wage of \$32.11 per hour or \$66,789 annually to afford a modest two-bedroom rental home.<sup>28</sup>
- There are 108,021 housing units in Erie County, of which 60.8% are owner-occupied units, 30.0% are rental units and 9.23% are vacant. Housing units in Erie County primarily consist of single-family (89.1%) homes.
- There are 15,194 housing units in Crawford County, of which 54.2% are owner-occupied units, 12.2% are rental units and 33.51% are vacant. Housing in Crawford County primarily consists of single-family (97.8%) homes.
- The median age of housing stock in Erie County is 61 years old and 59 years old in Crawford County with about 29.0% to 33.0% of housing built prior to 1950, respectively. The age of housing stock across the AA demonstrates a potential need for home improvement lending.

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<sup>25</sup> [2024 FMR – Erie County](#)

<sup>26</sup> [2024 FRM – Crawford County](#)

<sup>27</sup> [National Low Income Housing Coalition](#)

<sup>28</sup> [National Low Income Housing Coalition – National Average FMR](#)

Housing Cost Burden Assessment Area: Erie, PA CSA						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Erie County	63.2%	25.5%	16.2%	74.1%	29.6%	42.9%
Crawford County	56.1%	20.4%	14.8%	66.7%	17.5%	34.9%
Pennsylvania	61.9%	28.8%	18.6%	73.1%	34.9%	41.5%
<i>Cost Burden is housing cost that equals 30 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability</i>						

- 63.2% of low-income homeowners and 74.1% of low-income renters in Erie County are cost burdened, compared to 25.5% of moderate-income homeowners and 17.5% of moderate-income renters in the county.
- 56.1% of low-income homeowners and 66.7% of low-income renters in Crawford County are cost burdened, compared to 20.4% of moderate-income homeowners and 17.5% of moderate-income renters in the county.
- This data shows that cost burden disproportionately affects renter-occupied households, particularly low-income renters as well as low-income homeowners.
- Cost-burdened renters may have a difficult time saving enough money to make a sufficient downpayment to purchase a home or otherwise afford increasing rents.
- There is a growing disparity between median family incomes and escalating housing and rental costs, leading to increased financial strain on residents in Erie and Crawford counties.

Unemployment Rate Assessment Area: Erie, PA CSA					
Area	2019	2020	2021	2022	2023
Erie County	4.5%	9.6%	6.8%	4.6%	3.8%
Crawford County	4.7%	8.7%	6.2%	4.5%	3.7%
Pennsylvania	4.3%	8.9%	5.9%	4.1%	3.4%
<i>Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics</i>					

- Between 2019 and 2020, unemployment rates increased significantly in response to the COVID-19 pandemic. Unemployment rates in Erie and Crawford counties were higher than unemployment rates in Pennsylvania during this period. While unemployment rates rebounded in 2023, unemployment rates remained higher than rates in Pennsylvania.

- According to the Pennsylvania Department of Labor and Industry:<sup>29</sup>
  - Erie County
    - Leading industries include healthcare and social assistance, manufacturing, government, retail and accommodation and food services.
    - The average private sector wage was \$25 per hour or \$51,854 annually, which indicates employed persons can afford the median rent of \$876.
    - Major employers include but are not limited to Erie Indemnity Company, UPMC Hamot, state government, Wal-Mart, federal government, and the City of Erie School District.
  - Crawford County
    - Leading industries include education services, healthcare and social assistance, manufacturing, and retail trade.
    - The average private sector wage was \$32 per hour or \$66,907 annually, which indicates employed persons can afford the median rent of \$800.
    - Major employers include Meadville Medical Center, state government, Wal-Mart, Crawford Central School District, Giant Eagle, and the federal government.
- Based on 2023 Census data, 87.5% of households in Erie County have a broadband internet subscription, and 92.9% of households have a computer.<sup>30</sup> In Crawford County, 84.2% of households have a broadband internet connection, and 89.2% of households have a computer.<sup>31</sup>

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ERIE, PA CSA #240

### LENDING TEST

The lending performance in the Erie AA is Satisfactory.

Details of Andover's HMDA, home equity, and consumer lending can be found in the tables in Appendix D. There was only enough volume to evaluate HMDA loans in the Erie AA.

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<sup>29</sup>[Pennsylvania Department of Labor and Industry–County Profiles](#)

<sup>30</sup>[U.S. Census Quick Facts - Erie County](#)

<sup>31</sup>[U.S. Census Quick Facts - Crawford County](#)

### **Lending to Borrowers of Different Income Levels**

Borrower distribution received more weight than geographic distribution based on the higher percentage of LMI families compared to LMI geographies in the Erie AA.

Andover's lending penetration among borrowers of different income (including LMI) levels in the Erie AA is considered reasonable. Factors such as housing values and poverty levels impacted Andover's ability to originate loans.

#### ***HMDA Lending***

HMDA loans are comprised of home purchase, refinance, home improvement, other purpose closed end, and multi-family loans.

During the evaluation period, Andover originated 158 HMDA loans totaling \$16.4 million in the Erie AA and two (1.3%) loans were made to borrowers with unknown incomes. Andover's performance was compared to the percentage of families (proxy) and the aggregate lending performance. Andover's borrower distribution of HMDA lending is reasonable.

#### ***Erie, PA MSA***

Andover originated six (4.9%) HMDA loans to low-income borrowers, which was significantly below proxy at 20.6%. In 2022, 5.9% of HMDA loans were originated to low-income borrowers, which was below than the aggregate lending performance at 9.1%. In 2023, 2.6% of HMDA loans were originated to low-income borrowers, which was significantly below the aggregate lending performance at 9.7%.

Andover originated 22 (17.9%) HMDA loans to moderate-income borrowers, which exceeded proxy at 17.6%. In 2022, 15.3% of HMDA loans were originated to moderate-income borrowers, which was slightly below the aggregate lending performance at 19.8%. In 2023, 23.7% of HMDA loans were originated to moderate-income borrowers, which exceeded the aggregate lending performance at 22.3%.

Borrower distribution of HMDA loans to low-income borrowers is poor and excellent to moderate-income borrowers.



### *Nonmetropolitan Pennsylvania (Crawford County)*

Andover originated one (2.9%) HMDA loans to low-income borrowers, which was significantly below proxy at 17.2%. In 2022, no HMDA loans were originated to low-income borrowers, compared to the aggregate lending performance at 8.1%. In 2023, 9.1% of HMDA loans were originated to low-income borrowers, which exceeded the aggregate lending performance at 8.1%.

Andover originated nine (25.7%) HMDA loans to moderate-income borrowers, which exceeded proxy at 19.9%. In 2022, 25.0% of HMDA loans were originated to moderate-income borrowers, which was comparable to the aggregate lending performance at 25.8%. In 2023, 27.3% of HMDA loans were originated to moderate-income borrowers, which exceeded the aggregate lending performance at 22.0%.

Borrower distribution of HMDA loans to low-income borrowers is reasonable, considering mixed performance and excellent to moderate-income borrowers.

### **Geographic Distribution of Loans**

The geographic distribution is primarily based on lending performance in the Erie MSA. While there are no LMI tracts in Crawford County, geographic distribution in middle- and upper-income tracts was assessed and is reasonable compared to demographic and market indicators.

Andover's geographic distribution reflects a reasonable dispersion of loans in the Erie MSA. Andover's performance was compared to the percentage of owner-occupied units (proxy) and the aggregate lending performance. The geographic distribution of HMDA loans is reasonable. Andover has a substantial level of lending gaps.

### Lending Penetration

	Erie PA MSA - 2022				Erie PA MSA - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	9	8	1	11.1%	9	8	1	11.1%
Moderate	15	11	4	26.7%	15	13	2	13.3%
Middle	22	11	11	50.0%	22	11	11	5.0%
Upper	17	8	9	52.9%	17	11	6	35.3%
Unknown	2	2	0	0.0%	2	2	0	0.0%
<b>Total</b>	<b>65</b>	<b>40</b>	<b>25</b>	<b>38.5%</b>	<b>65</b>	<b>45</b>	<b>20</b>	<b>30.8%</b>

Andover penetrated 34.6% of its total tracts in the Erie MSA during the evaluation period, which is a substantial level of lending gaps. Andover penetrated 11.1% of its low-income and 20.0% of its moderate-income tracts, which is a substantial level of lending gaps. Andover does not have a significant presence in the Erie market. Andover's nearest branch is approximately eight miles away from the city of Erie where the majority of LMI tracts are located.

### Lending Penetration

	Nonmetropolitan Pennsylvania - 2022				Nonmetropolitan Pennsylvania - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	0	0	0	No Tracts	0	0	0	No Tracts
Moderate	0	0	0	No Tracts	0	0	0	No Tracts
Middle	7	0	7	100.0%	7	0	7	100.0%
Upper	1	0	1	100.0%	1	0	1	100.0%
Unknown	0	0	0	No Tracts	0	0	0	No Tracts
<b>Total</b>	<b>8</b>	<b>0</b>	<b>8</b>	<b>100.0%</b>	<b>8</b>	<b>0</b>	<b>8</b>	<b>100.0%</b>

Andover was able to penetrate 100.0% of its middle- and upper-income tracts in Crawford County. Andover has no branches in Crawford County.

### *HMDA Lending*

During the evaluation period, Andover originated 123 HMDA loans totaling \$13.1 million in the Erie MSA.

Andover originated two (1.6%) HMDA loans in low-income tracts, which was significantly below proxy at 4.1%. In 2022, 1.2% of HMDA loans were originated in low-income tracts, which was significantly below the aggregate lending performance at 2.7%. In 2023, 2.6% of HMDA loans were originated in low-income tracts, which was slightly below the aggregate lending performance at 3.1%.

Andover originated 17 (13.8%) HMDA loans in moderate-income tracts, which exceeded proxy at 12.8%. In 2022, 15.3% of HMDA loans were originated in moderate-income tracts, which exceeded the aggregate lending performance at 12.8%. In 2023, 10.5% of HMDA loans were originated in moderate-income tracts, which was below the aggregate lending performance at 14.1%.

Geographic distribution of HMDA loans is reasonable in low-income tracts, considering the limited number of owner-occupied housing units and high percentage of families below the poverty level in these tracts and excellent in moderate-income tracts.

### **COMMUNITY DEVELOPMENT TEST**

Andover's community development performance demonstrates excellent responsiveness to community development needs in the Erie AA. Andover's community development activities helped revitalize and stabilize LMI communities through loans to a commercial building operator and PPP loans to small businesses. Community development activities also support services to LMI individuals and families and economic development initiatives. Since the previous evaluation, Andover originated a non-PPP community development loan. The contact emphasized the need for financial literacy education and wraparound services for LMI individuals and families. The contact also expressed a need for redevelopment of vacant and/or blighted properties to encourage economic revitalization. The majority of community development activities supported these expressed needs.

### *Community Development Lending*

Andover originated four community development loans totaling \$2.3 million in the Erie AA. These loans represent 30.4% of total community development loans. The following table shows

the total number of community development loans by purpose, number and dollar amount.

CD Loan Purpose	#	\$
Revitalization / Stabilization	4	\$2,274,730
<b>Total</b>	<b>4</b>	<b>\$2,274,730</b>

#### Revitalization / Stabilization

- A loan totaling \$2.3 million to a commercial building operator to refurbish a historical building (former post office) in a low-income geography to retain current tenants and attract new businesses to the area.
- Three PPP loans totaling \$28,480 that benefited small businesses in moderate-income geographies. These loans helped these businesses maintain payroll and avoid layoffs during the height of the COVID-19 emergency.

#### Community Development Investments

Andover's qualified investments were in the form of small dollar donations. Andover made 26 donations totaling \$20,030 to 17 organizations. The following table shows the total number of qualified donations by purpose, number, and dollar amount.

CD Donation Purpose	#	\$
Services to LMI	20	19,505
Economic Development	6	\$525
<b>Total</b>	<b>26</b>	<b>\$20,030</b>

These donations represent 13.9% of total qualified donations. Donations include:

#### Services to LMI

- Four donations totaling \$14,750 to a large nonprofit that provides wraparound services to LMI individuals and families.
- A \$1,500 donation to provide access to technology at a low cost to help LMI children and families develop an interest in reducing electronic waste in landfills by refurbishing and reusing technology.
- A donation totaling \$520 to provide screens and projectors to a financial learning and

childcare center.

### **Economic Development**

- Three donations totaling \$250 to a local chamber to help promote economic and community development initiatives for small businesses in the community.
- One donation totaling \$200 to an economic development organization to help promote economic development initiatives in the community.

### ***Community Development Services***

During the evaluation period, eight employees assisted seven organizations, and provided 35 community development services totaling 594 hours as shown in the table below.

<b>CD Service Purpose</b>	<b># Services</b>	<b># Orgs</b>	<b># Employees*</b>	<b># Hours</b>
Services to LMI	26	3	4	358
Economic Development	7	3	3	188
Revitalization/Stabilization	2	1	1	48
<b>Total</b>	<b>35</b>	<b>7</b>	<b>8</b>	<b>594</b>

Employees were involved with organizations and activities that promote community services targeted to LMI individuals, economic development, and to a lesser extent, revitalization and stabilization. Bank officers and employees worked with a variety of community service organizations throughout the AA during the evaluation period. Most of Andover's community development services are provided through serving on boards and committees (532 hours) followed by providing technical assistance (48 hours) and financial literacy training (14 hours). Service hours represent 25.5% of total community development service hours and equate to 0.3 ANP.

### **Membership on Boards/Committees**

- Three employees serve on boards of six nonprofit organizations that provide wraparound services to LMI individuals and families (e.g., food banks and scholarships for LMI students, and allocate funding to nonprofits in need).
- One employee serves on the board and secretary of local economic development organization that promotes economic development initiatives at the municipal level.
- One employee serves on the board of a community and economic development corporation that promotes economic development initiatives at the municipal level.

- One employee serves on the board of a county-level economic development corporation and is a member of the microloan fund committee.

**Technical Expertise**

- An employee provides technical assistance in the form of advisory services to address various aspects of financial aid operations for a university in a moderate-income area.

**Financial Literacy**

- One employee partnering with a community center in a moderate-income area to provide financial literacy education to LMI individuals and families.

## APPENDICES

### Appendix A – Scope of Examination Tables

Scope of Examination			
<b>TIME PERIOD REVIEWED</b>		Lending Test: January 1, 2022 – December 31, 2023  Community Development Test: February 22, 2021 – February 24, 2025	
<b>FINANCIAL INSTITUTION</b>  Andover Bank, Andover, Ohio			<b>PRODUCTS REVIEWED</b>  HMDA – home purchase, refinance, home improvement, multi-family, other lines of credit  HELOCs  Consumer – motor vehicle, other secured, other unsecured
Andover Bank has no affiliate relationships subject to examination.			

There is a statutory requirement that the written evaluation of a multistate institution's performance must list the individual branches examined in each state.

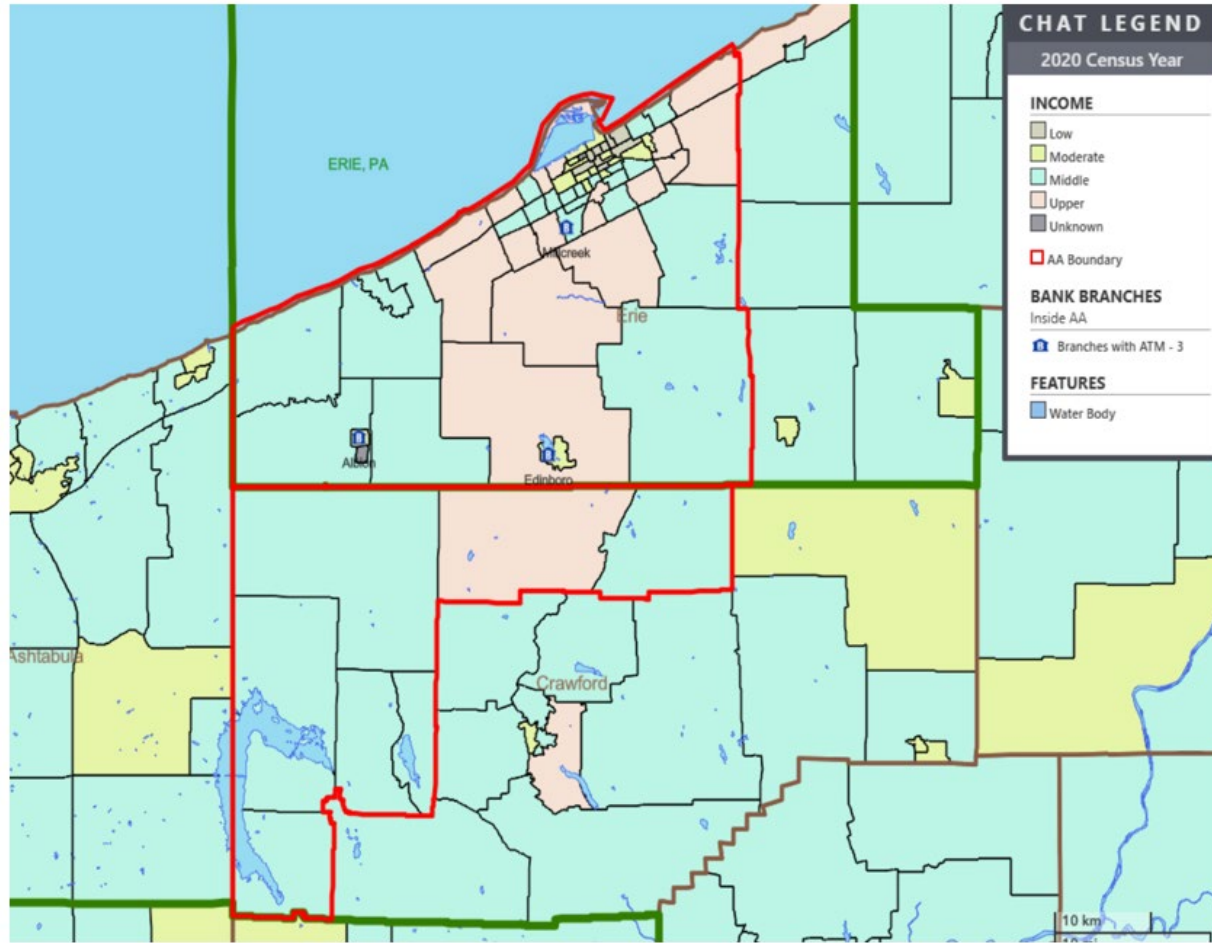
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
AA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
OHIO			
Nonmetropolitan Ohio	Full-scope review	None	N/A
Cleveland-Elyria OH MSA	Limited-scope review		
PENNSYLVANIA			
Erie PA CSA	Full-scope review	None	N/A



## OH Nonmetropolitan 2022 - 2023



PA Erie CSA - 2022 - 2023



**CHAT LEGEND**  
2020 Census Year

**INCOME**

- Low
- Moderate
- Middle
- Upper
- Unknown

**BANK BRANCHES**  
Inside AA

- Branches with ATM - 1

**FEATURES**

- Water Body

**AA Boundary**

**CLEVELAND-ELYRIA, OH**

**Lakewood**

**Geauga**

**Lorain**

**Medina**

**AKRON, OH**

**Barberton**

**Trumbull**

**Mahoning**

10 km

## Appendix C – Demographic Tables

### Combined Demographics Report

#### Assessment Area: Nonmetropolitan Ohio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	5,962	24.3%
Moderate-income	9	31.0%	7,627	31.1%	1,724	22.6%	4,905	20.0%
Middle-income	19	65.5%	16,910	68.9%	1,933	11.4%	5,823	23.7%
Upper-income	0	0.0%	0	0.0%	0	0.0%	7,847	32.0%
Unknown-income	1	3.4%	0	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>29</b>	<b>100.0%</b>	<b>24,537</b>	<b>100.0%</b>	<b>3,657</b>	<b>14.9%</b>	<b>24,537</b>	<b>100.0%</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	14,670	7,698	27.9%	52.5%	4,584	31.2%	2,388	16.3%
Middle-income	31,554	19,895	72.1%	63.1%	6,437	20.4%	5,222	16.5%
Upper-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>46,224</b>	<b>27,593</b>	<b>100.0%</b>	<b>59.7%</b>	<b>11,021</b>	<b>23.8%</b>	<b>7,610</b>	<b>16.5%</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	1,070	30.7%	960	30.4%	91	37.3%	19	25.0%
Middle-income	2,410	69.3%	2,200	69.6%	153	62.7%	57	75.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>3,480</b>	<b>100.0%</b>	<b>3,160</b>	<b>100.0%</b>	<b>244</b>	<b>100.0%</b>	<b>76</b>	<b>100.0%</b>
	Percentage of Total Businesses:			90.8%		7.0%		2.2%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	28	16.5%	25	15.2%	2	40.0%	1	100.0%
Middle-income	142	83.5%	139	84.8%	3	60.0%	0	0.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>170</b>	<b>100.0%</b>	<b>164</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>
	Percentage of Total Farms:			96.5%		2.9%		0.6%

### Combined Demographics Report

#### Assessment Area: Erie PA CSA (Erie PA MSA)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	13.8%	4,551	7.6%	1,692	37.2%	12,309	20.6%
Moderate-income	15	23.1%	9,189	15.3%	1,759	19.1%	10,533	17.6%
Middle-income	22	33.8%	24,369	40.7%	1,766	7.2%	12,727	21.3%
Upper-income	17	26.2%	21,463	35.8%	820	3.8%	24,306	40.6%
Unknown-income	2	3.1%	303	0.5%	161	53.1%	0	0.0%
<b>Total Assessment Area</b>	<b>65</b>	<b>100.0%</b>	<b>59,875</b>	<b>100.0%</b>	<b>6,198</b>	<b>10.4%</b>	<b>59,875</b>	<b>100.0%</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,260	2,669	4.1%	26.0%	6,009	58.6%	1,582	15.4%
Moderate-income	20,327	8,336	12.8%	41.0%	9,477	46.6%	2,514	12.4%
Middle-income	42,877	28,294	43.6%	66.0%	11,027	25.7%	3,556	8.3%
Upper-income	33,398	25,497	39.3%	76.3%	5,778	17.3%	2,123	6.4%
Unknown-income	1,159	130	0.2%	11.2%	846	73.0%	183	15.8%
<b>Total Assessment Area</b>	<b>108,021</b>	<b>64,926</b>	<b>100.0%</b>	<b>60.1%</b>	<b>33,137</b>	<b>30.7%</b>	<b>9,958</b>	<b>9.2%</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	829	9.8%	711	9.4%	112	13.3%	6	7.1%
Moderate-income	1,395	16.4%	1,190	15.7%	192	22.9%	13	15.3%
Middle-income	3,155	37.2%	2,829	37.4%	287	34.2%	39	45.9%
Upper-income	2,951	34.8%	2,689	35.5%	236	28.1%	26	30.6%
Unknown-income	162	1.9%	149	2.0%	12	1.4%	1	1.2%
<b>Total Assessment Area</b>	<b>8,492</b>	<b>100.0%</b>	<b>7,568</b>	<b>100.0%</b>	<b>839</b>	<b>100.0%</b>	<b>85</b>	<b>100.0%</b>
	Percentage of Total Businesses:			89.1%		9.9%		1.0%
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	2	1.8%	2	1.8%	0	0.0%	0	0.0%
Moderate-income	3	2.7%	3	2.7%	0	0.0%	0	0.0%
Middle-income	61	54.5%	59	53.6%	2	100.0%	0	0.0%
Upper-income	45	40.2%	45	40.9%	0	0.0%	0	0.0%
Unknown-income	1	0.9%	1	0.9%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>112</b>	<b>100.0%</b>	<b>110</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>
	Percentage of Total Farms:			98.2%		1.8%		0.0%

Based on 2023 FFIEC Census Data and 2023 D&B Information

## Combined Demographics Report

### Assessment Area: Erie PA CSA (Nonmetropolitan PA)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	1,129	17.2%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	1,304	19.9%
Middle-income	7	87.5%	5,466	83.4%	445	8.1%	1,517	23.1%
Upper-income	1	12.5%	1,087	16.6%	38	3.5%	2,603	39.7%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	8	100.0%	6,553	100.0%	483	7.4%	6,553	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Middle-income	13,431	6,897	83.7%	51.4%	1,664	12.4%	4,870	36.3%
Upper-income	1,763	1,348	16.3%	76.5%	194	11.0%	221	12.5%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	15,194	8,245	100.0%	54.3%	1,858	12.2%	5,091	33.5%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle-income	820	86.3%	749	86.5%	39	81.3%	32	88.9%
Upper-income	130	13.7%	117	13.5%	9	18.8%	4	11.1%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	950	100.0%	866	100.0%	48	100.0%	36	100.0%
	Percentage of Total Businesses:			91.2%		5.1%		3.8%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle-income	68	90.7%	67	90.5%	1	100.0%	0	0.0%
Upper-income	7	9.3%	7	9.5%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	75	100.0%	74	100.0%	1	100.0%	0	0.0%
	Percentage of Total Farms:			98.7%		1.3%		0.0%

Based on 2023 FFIEC Census Data and 2023 D&B Information



### Combined Demographics Report

#### Assessment Area: Cleveland-Elyria OH MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	4,045	17.0%
Moderate-income	6	26.1%	5,199	21.9%	774	14.9%	3,988	16.8%
Middle-income	9	39.1%	9,162	38.5%	436	4.8%	5,117	21.5%
Upper-income	8	34.8%	9,418	39.6%	323	3.4%	10,629	44.7%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	23	100.0%	23,779	100.0%	1,533	6.4%	23,779	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	9,837	4,653	17.1%	47.3%	4,328	44.0%	856	8.7%
Middle-income	14,944	11,186	41.2%	74.9%	2,490	16.7%	1,268	8.5%
Upper-income	13,770	11,321	41.7%	82.2%	1,696	12.3%	753	5.5%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	38,551	27,160	100.0%	70.5%	8,514	22.1%	2,877	7.5%
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	752	21.3%	673	20.7%	74	29.5%	5	13.5%
Middle-income	1,455	41.2%	1,319	40.6%	116	46.2%	20	54.1%
Upper-income	1,327	37.5%	1,254	38.6%	61	24.3%	12	32.4%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	3,534	100.0%	3,246	100.0%	251	100.0%	37	100.0%
	Percentage of Total Businesses:			91.9%		7.1%		1.0%
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	1	2.0%	1	2.1%	0	0.0%	0	0.0%
Middle-income	31	62.0%	30	62.5%	1	50.0%	0	0.0%
Upper-income	18	36.0%	17	35.4%	1	50.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	50	100.0%	48	100.0%	2	100.0%	0	0.0%
	Percentage of Total Farms:			96.0%		4.0%		0.0%

Based on 2023 FFIEC Census Data and 2023 D&B Information

## Appendix D –Lending Tables

### HMDA Lending Tables

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: OH Nonmetropolitan

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	%	\$ (000s)	\$ %		Bank	Agg	%	Bank	Agg	\$ %	Bank	Agg	%	Bank	Agg	\$ %
HOME PURCHASE	Low	7	8.1%	248	2.0%	24.3%	4	9.3%	11.2%	173	2.9%	6.8%	3	7.0%	10.2%	75	1.2%	5.8%
	Moderate	19	22.1%	1,963	16.0%	20.0%	12	27.9%	24.4%	1,178	19.6%	19.5%	7	16.3%	26.5%	785	12.5%	19.7%
	Middle	16	18.6%	2,376	19.4%	23.7%	7	16.3%	23.8%	1,071	17.8%	23.6%	9	20.9%	22.4%	1,305	20.8%	22.9%
	Upper	41	47.7%	6,522	53.2%	32.0%	20	46.5%	23.0%	3,582	59.7%	33.3%	21	48.8%	23.2%	2,940	46.9%	31.9%
	Unknown	3	3.5%	1,160	9.5%	0.0%	0	0.0%	17.7%	0	0.0%	16.8%	3	7.0%	17.7%	1,160	18.5%	19.6%
	Total	86	100%	12,269	100%	100.0%	43	100%	100%	6,004	100%	100%	43	100%	100%	6,265	100%	100%
REFINANCE	Low	13	13.8%	1,016	11.6%	24.3%	6	10.3%	12.7%	604	11.8%	8.7%	7	19.4%	19.0%	412	11.2%	11.6%
	Moderate	22	23.4%	1,517	17.3%	20.0%	14	24.1%	26.3%	997	19.5%	22.2%	8	22.2%	26.3%	520	14.1%	20.1%
	Middle	20	21.3%	1,737	19.8%	23.7%	14	24.1%	28.7%	1,132	22.2%	28.7%	6	16.7%	21.7%	605	16.4%	23.7%
	Upper	38	40.4%	3,722	42.3%	32.0%	24	41.4%	26.3%	2,375	46.5%	33.1%	14	38.9%	25.2%	1,347	36.6%	31.9%
	Unknown	1	1.1%	800	9.1%	0.0%	0	0.0%	6.1%	0	0.0%	7.2%	1	2.8%	7.8%	800	21.7%	12.8%
	Total	94	100%	8,792	100%	100.0%	58	100%	100%	5,108	100%	100%	36	100%	100%	3,684	100%	100%
HOME IMPROVEMENT	Low	10	15.6%	298	11.1%	24.3%	7	18.4%	10.4%	243	14.1%	7.9%	3	11.5%	11.1%	55	5.8%	7.2%
	Moderate	17	26.6%	569	21.2%	20.0%	12	31.6%	28.5%	432	25.0%	23.2%	5	19.2%	29.8%	137	14.4%	21.0%
	Middle	15	23.4%	609	22.7%	23.7%	8	21.1%	25.7%	314	18.2%	21.4%	7	26.9%	21.2%	295	31.0%	21.6%
	Upper	22	34.4%	1,205	44.9%	32.0%	11	28.9%	35.3%	740	42.8%	47.5%	11	42.3%	33.3%	465	48.8%	46.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	4.5%	0	0.0%	3.7%
	Total	64	100%	2,681	100%	100.0%	38	100%	100%	1,729	100%	100%	26	100%	100%	952	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	24.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	20.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	23.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	2	40.0%	684	18.8%	32.0%	2	66.7%	14.3%	684	25.5%	5.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	3	60.0%	2,956	81.2%	0.0%	1	33.3%	85.7%	2,000	74.5%	94.7%	2	100.0%	100.0%	956	100.0%	100.0%
	Total	5	100%	3,640	100%	100.0%	3	100%	100%	2,684	100%	100%	2	100%	100%	956	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	24.3%	0	0.0%	11.8%	0	0.0%	7.1%	0	0.0%	15.3%	0	0.0%	12.1%
	Moderate	0	0.0%	0	0.0%	20.0%	0	0.0%	31.2%	0	0.0%	29.5%	0	0.0%	31.4%	0	0.0%	23.6%
	Middle	0	0.0%	0	0.0%	23.7%	0	0.0%	24.7%	0	0.0%	21.4%	0	0.0%	31.4%	0	0.0%	32.9%
	Upper	0	0.0%	0	0.0%	32.0%	0	0.0%	30.1%	0	0.0%	40.3%	0	0.0%	21.2%	0	0.0%	31.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.2%	0	0.0%	1.7%	0	0.0%	0.8%	0	0.0%	0.3%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data



Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: OH Nonmetropolitan

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			#	%	%	#	%	%	#	%	%	#	%	%
#	%	\$(000s)	\$%	#	%	%												
OTHER PURPOSE CLOSED/EXEMPT	Low	3	8.8%	52	2.1%	24.3%	2	13.3%	14.3%	37	5.9%	9.6%	1	5.3%	11.7%	15	0.8%	5.8%
	Moderate	12	35.3%	478	19.4%	20.0%	4	26.7%	32.1%	131	20.9%	21.6%	8	42.1%	29.9%	347	18.9%	22.6%
	Middle	6	17.6%	243	9.9%	23.7%	4	26.7%	23.2%	120	19.1%	21.1%	2	10.5%	22.1%	123	6.7%	17.1%
	Upper	13	38.2%	1,690	68.6%	32.0%	5	33.3%	28.6%	340	54.1%	45.7%	8	42.1%	35.1%	1,350	73.6%	54.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.8%	0	0.0%	2.0%	0	0.0%	1.3%	0	0.0%	0.4%
	Total	34	100%	2,463	100%	100.0%	15	100%	100%	628	100%	100%	19	100%	100%	1,835	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	24.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	20.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	23.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	32.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	33	11.7%	1,614	5.4%	24.3%	19	12.1%	11.5%	1,057	6.5%	7.1%	14	11.1%	12.4%	557	4.1%	7.0%
	Moderate	70	24.7%	4,527	15.2%	20.0%	42	26.8%	25.4%	2,738	17.0%	19.8%	28	22.2%	27.1%	1,789	13.1%	19.6%
	Middle	57	20.1%	4,965	16.6%	23.7%	33	21.0%	25.1%	2,637	16.3%	23.7%	24	19.0%	22.5%	2,328	17.0%	22.6%
	Upper	116	41.0%	13,823	46.3%	32.0%	62	39.5%	25.4%	7,721	47.8%	33.0%	54	42.9%	24.9%	6,102	44.6%	32.6%
	Unknown	7	2.5%	4,916	16.5%	0.0%	1	0.6%	12.6%	2,000	12.4%	16.3%	6	4.8%	13.1%	2,916	21.3%	18.2%
	Total	283	100%	29,845	100%	100.0%	157	100%	100%	16,153	100%	100%	126	100%	100%	13,692	100%	100%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: OH Nonmetropolitan

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Owner Occupied Units %	Count			Dollar		Count			Dollar			
		Count #	%	Dollar \$(000s)	%		Bank #	%	Agg %	Bank \$(000s)	%	Agg %	Bank #	%	Agg %	Bank \$(000s)	%	Agg %
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	24	27.9%	3,080	25.1%	27.9%	12	27.9%	29.9%	1,649	27.5%	24.5%	12	27.9%	29.3%	1,431	22.8%	24.3%
	Middle	62	72.1%	9,189	74.9%	72.1%	31	72.1%	70.1%	4,355	72.5%	75.5%	31	72.1%	70.7%	4,834	77.2%	75.7%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	86	100%	12,269	100%	100.0%	43	100%	100%	6,004	100%	100%	43	100%	100%	6,265	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	25	26.6%	2,343	26.6%	27.9%	16	27.6%	22.6%	1,609	31.5%	20.9%	9	25.0%	24.1%	734	19.9%	21.6%
	Middle	69	73.4%	6,449	73.4%	72.1%	42	72.4%	77.4%	3,499	68.5%	79.1%	27	75.0%	75.9%	2,950	80.1%	78.4%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	94	100%	8,792	100%	100.0%	58	100%	100%	5,108	100%	100%	36	100%	100%	3,684	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	20	31.3%	699	26.1%	27.9%	9	23.7%	17.3%	370	21.4%	16.9%	11	42.3%	24.7%	329	34.6%	24.3%
	Middle	44	68.8%	1,982	73.9%	72.1%	29	76.3%	82.7%	1,359	78.6%	83.1%	15	57.7%	75.3%	623	65.4%	75.7%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	64	100%	2,681	100%	100.0%	38	100%	100%	1,729	100%	100%	26	100%	100%	952	100%	100%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	1	20.0%	350	9.6%	41.7%	1	33.3%	50.0%	350	13.0%	63.6%	0	0.0%	57.1%	0	0.0%	75.7%
	Middle	4	80.0%	3,290	90.4%	58.3%	2	66.7%	50.0%	2,334	87.0%	36.4%	2	100.0%	42.9%	956	100.0%	24.3%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	5	100%	3,640	100%	100.0%	3	100%	100%	2,684	100%	100%	2	100%	100%	956	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	27.9%	0	0.0%	17.2%	0	0.0%	14.2%	0	0.0%	22.0%	0	0.0%	19.8%
	Middle	0	0.0%	0	0.0%	72.1%	0	0.0%	82.8%	0	0.0%	85.8%	0	0.0%	78.0%	0	0.0%	80.2%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Nonmetropolitan

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	11	32.4%	379	15.4%	27.9%	5	33.3%	28.6%	167	26.6%	25.0%	6	31.6%	31.2%	212	11.6%	24.1%
	Middle	23	67.6%	2,084	84.6%	72.1%	10	66.7%	71.4%	461	73.4%	75.0%	13	68.4%	68.8%	1,623	88.4%	75.9%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	34	100%	2,463	100%	100.0%	15	100%	100%	628	100%	100%	19	100%	100%	1,835	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	27.9%	0	0.0%	60.9%	0	0.0%	46.8%	0	0.0%	50.0%	0	0.0%	29.1%
	Middle	0	0.0%	0	0.0%	72.1%	0	0.0%	39.1%	0	0.0%	53.2%	0	0.0%	50.0%	0	0.0%	70.9%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	81	28.6%	6,851	23.0%	27.9%	43	27.4%	26.3%	4,145	25.7%	24.6%	38	30.2%	27.5%	2,706	19.8%	24.7%
	Middle	202	71.4%	22,994	77.0%	72.1%	114	72.6%	73.7%	12,008	74.3%	75.4%	88	69.8%	72.5%	10,986	80.2%	75.3%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	283	100%	29,845	100%	100.0%	157	100%	100%	16,153	100%	100%	126	100%	100%	13,692	100%	100%

Originations & Purchases  
Based on 2023 FHLC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: PA Erie MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank			Families by Family Income	Count			Dollar			Count			Dollar			
		Count	Dollar			Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg		
#	%	\$(000s)	\$%	%	#	%	%	\$(000s)	\$%	\$%	#	%	%	\$(000s)	\$%	\$%		
HOME PURCHASE	Low	2	7.7%	156	3.6%	20.6%	1	5.6%	9.0%	76	2.4%	4.7%	1	12.5%	9.1%	80	6.9%	4.8%
	Moderate	7	26.9%	609	13.9%	17.6%	4	22.2%	22.4%	266	8.3%	15.6%	3	37.5%	24.1%	343	29.6%	18.1%
	Middle	8	30.8%	1,297	29.6%	21.3%	6	33.3%	22.7%	917	28.5%	20.8%	2	25.0%	22.1%	380	32.8%	20.2%
	Upper	9	34.6%	2,316	52.9%	40.6%	7	38.9%	32.2%	1,961	60.9%	46.1%	2	25.0%	28.5%	355	30.7%	41.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	13.8%	0	0.0%	12.8%	0	0.0%	16.1%	0	0.0%	15.8%
	Total	26	100%	4,378	100%	100.0%	18	100%	100%	3,220	100%	100%	8	100%	100%	1,158	100%	100%
REFINANCE	Low	3	5.9%	143	2.4%	20.6%	3	7.3%	10.1%	143	3.2%	5.7%	0	0.0%	11.6%	0	0.0%	6.8%
	Moderate	4	7.8%	332	5.7%	17.6%	3	7.3%	18.4%	260	5.7%	13.9%	1	10.0%	22.9%	72	5.3%	19.1%
	Middle	19	37.3%	1,952	33.2%	21.3%	16	39.0%	24.6%	1,652	36.5%	21.7%	3	30.0%	26.5%	300	22.2%	25.8%
	Upper	25	49.0%	3,448	58.7%	40.6%	19	46.3%	39.6%	2,470	54.6%	50.7%	6	60.0%	28.9%	978	72.4%	37.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	7.3%	0	0.0%	8.0%	0	0.0%	10.1%	0	0.0%	11.3%
	Total	51	100%	5,875	100%	100.0%	41	100%	100%	4,525	100%	100%	10	100%	100%	1,350	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	20.6%	0	0.0%	8.1%	0	0.0%	5.3%	0	0.0%	10.8%	0	0.0%	6.5%
	Moderate	6	23.1%	415	24.6%	17.6%	4	28.6%	14.9%	300	33.4%	11.8%	2	16.7%	21.9%	115	14.6%	15.5%
	Middle	7	26.9%	409	24.2%	21.3%	3	21.4%	26.1%	139	15.5%	23.6%	4	33.3%	25.7%	270	34.2%	22.8%
	Upper	13	50.0%	865	51.2%	40.6%	7	50.0%	47.6%	460	51.2%	55.5%	6	50.0%	39.2%	405	51.3%	52.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.3%	0	0.0%	3.7%	0	0.0%	2.4%	0	0.0%	3.1%
	Total	26	100%	1,689	100%	100.0%	14	100%	100%	899	100%	100%	12	100%	100%	790	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	20.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.6%	0	0.0%	2.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.6%	0	0.0%	2.0%	0	0.0%	0.1%	0	0.0%	6.3%	0	0.0%	0.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	95.9%	0	0.0%	99.8%	0	0.0%	93.8%	0	0.0%	99.2%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	20.6%	0	0.0%	11.0%	0	0.0%	8.9%	0	0.0%	9.5%	0	0.0%	6.2%
	Moderate	0	0.0%	0	0.0%	17.6%	0	0.0%	17.0%	0	0.0%	11.1%	0	0.0%	17.8%	0	0.0%	11.8%
	Middle	0	0.0%	0	0.0%	21.3%	0	0.0%	22.0%	0	0.0%	22.1%	0	0.0%	24.5%	0	0.0%	16.3%
	Upper	0	0.0%	0	0.0%	40.6%	0	0.0%	46.8%	0	0.0%	53.1%	0	0.0%	44.7%	0	0.0%	61.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.2%	0	0.0%	4.8%	0	0.0%	3.6%	0	0.0%	4.3%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

**Borrower Distribution of HMDA Loans - Table 2 of 2**  
Assessment Area: PA Erie MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	\$%	#	%	%									\$(000s)	\$%	%	#
OTHER PURPOSE CLOSED/EXEMPT	Low	1	5.0%	25	2.1%	20.6%	1	8.3%	8.4%	25	2.8%	5.3%	0	0.0%	9.7%	0	0.0%	7.2%
	Moderate	5	25.0%	311	26.6%	17.6%	2	16.7%	23.8%	225	25.5%	18.5%	3	37.5%	17.9%	86	30.0%	14.8%
	Middle	3	15.0%	111	9.5%	21.3%	1	8.3%	23.3%	44	5.0%	18.2%	2	25.0%	27.6%	67	23.3%	24.6%
	Upper	10	50.0%	523	44.7%	40.6%	7	58.3%	41.9%	389	44.1%	55.4%	3	37.5%	41.7%	134	46.7%	51.8%
	Unknown	1	5.0%	200	17.1%	0.0%	1	8.3%	2.6%	200	22.7%	2.6%	0	0.0%	3.1%	0	0.0%	1.5%
	Total	20	100%	1,170	100%	100.0%	12	100%	100%	883	100%	100%	8	100%	100%	287	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	20.6%	0	0.0%	2.6%	0	0.0%	2.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.6%	0	0.0%	2.6%	0	0.0%	3.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	94.9%	0	0.0%	94.1%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	6	4.9%	324	2.5%	20.6%	5	5.9%	9.1%	244	2.6%	4.4%	1	2.6%	9.7%	80	2.2%	4.8%
	Moderate	22	17.9%	1,667	12.7%	17.6%	13	15.3%	19.8%	1,051	11.0%	12.7%	9	23.7%	22.3%	616	17.2%	15.6%
	Middle	37	30.1%	3,769	28.7%	21.3%	26	30.6%	23.3%	2,752	28.9%	18.2%	11	28.9%	23.7%	1,017	28.4%	18.8%
	Upper	57	46.3%	7,152	54.5%	40.6%	40	47.1%	36.9%	5,280	55.4%	41.3%	17	44.7%	31.8%	1,872	52.2%	37.4%
	Unknown	1	0.8%	200	1.5%	0.0%	1	1.2%	10.9%	200	2.1%	23.4%	0	0.0%	12.4%	0	0.0%	23.5%
	Total	123	100%	13,112	100%	100.0%	85	100%	100%	9,527	100%	100%	38	100%	100%	3,585	100%	100%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: PA Erie MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$(000s)	%		Bank #	%	Agg %	Bank \$(000s)	%	Agg %	Bank #	%	Agg %	Bank \$(000s)	%	Agg %
HOME PURCHASE	Low	1	3.8%	63	1.4%	4.1%	1	5.6%	3.3%	63	2.0%	1.4%	0	0.0%	2.9%	0	0.0%	1.4%
	Moderate	2	7.7%	150	3.4%	12.8%	1	5.6%	15.3%	76	2.4%	9.2%	1	12.5%	16.8%	74	6.4%	10.9%
	Middle	9	34.6%	1,107	25.3%	43.6%	6	33.3%	45.6%	675	21.0%	38.7%	3	37.5%	44.4%	432	37.3%	38.8%
	Upper	14	53.8%	3,058	69.8%	39.3%	10	55.6%	35.6%	2,406	74.7%	50.6%	4	50.0%	35.6%	652	56.3%	48.7%
	Unknown	0	0.0%	0	0.0%	0.2%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0.2%	0	0.0%	0.2%
	Total	26	100%	4,378	100%	100.0%	18	100%	100%	3,220	100%	100%	8	100%	100%	1,158	100%	100%
REFINANCE	Low	1	2.0%	72	1.2%	4.1%	0	0.0%	2.3%	0	0.0%	1.0%	1	10.0%	3.9%	72	5.3%	2.8%
	Moderate	9	17.6%	1,143	19.5%	12.8%	8	19.5%	10.6%	995	22.0%	7.0%	1	10.0%	11.8%	148	11.0%	9.0%
	Middle	20	39.2%	2,263	38.5%	43.6%	15	36.6%	40.0%	1,463	32.3%	34.7%	5	50.0%	41.5%	800	59.3%	37.7%
	Upper	21	41.2%	2,397	40.8%	39.3%	18	43.9%	46.8%	2,067	45.7%	57.1%	3	30.0%	42.7%	330	24.4%	50.3%
	Unknown	0	0.0%	0	0.0%	0.2%	0	0.0%	0.3%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0.2%
	Total	51	100%	5,875	100%	100.0%	41	100%	100%	4,525	100%	100%	10	100%	100%	1,350	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	4.1%	0	0.0%	1.8%	0	0.0%	1.4%	0	0.0%	3.0%	0	0.0%	1.7%
	Moderate	3	11.5%	155	9.2%	12.8%	1	7.1%	7.8%	20	2.2%	6.0%	2	16.7%	9.8%	135	17.1%	6.3%
	Middle	15	57.7%	1,025	60.7%	43.6%	7	50.0%	41.7%	560	62.3%	36.2%	8	66.7%	41.3%	465	58.9%	35.6%
	Upper	8	30.8%	509	30.1%	39.3%	6	42.9%	48.5%	319	35.5%	56.2%	2	16.7%	46.0%	190	24.1%	56.4%
	Unknown	0	0.0%	0	0.0%	0.2%	0	0.0%	0.3%	0	0.0%	0.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	26	100%	1,689	100%	100.0%	14	100%	100%	899	100%	100%	12	100%	100%	790	100%	100%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	0	0.0%	17.3%	0	0.0%	10.2%	0	0.0%	3.6%	0	0.0%	12.5%	0	0.0%	1.9%
	Moderate	0	0.0%	0	0.0%	16.7%	0	0.0%	32.7%	0	0.0%	21.2%	0	0.0%	29.2%	0	0.0%	29.6%
	Middle	0	0.0%	0	0.0%	37.8%	0	0.0%	30.6%	0	0.0%	19.3%	0	0.0%	27.1%	0	0.0%	21.4%
	Upper	0	0.0%	0	0.0%	23.1%	0	0.0%	16.3%	0	0.0%	54.3%	0	0.0%	20.8%	0	0.0%	42.7%
	Unknown	0	0.0%	0	0.0%	5.1%	0	0.0%	10.2%	0	0.0%	1.6%	0	0.0%	10.4%	0	0.0%	4.4%
OTHER PURPOSE LOC	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
	Low	0	0.0%	0	0.0%	4.1%	0	0.0%	1.4%	0	0.0%	0.5%	0	0.0%	1.6%	0	0.0%	0.8%
	Moderate	0	0.0%	0	0.0%	12.8%	0	0.0%	9.2%	0	0.0%	6.5%	0	0.0%	8.3%	0	0.0%	8.5%
	Middle	0	0.0%	0	0.0%	43.6%	0	0.0%	36.5%	0	0.0%	30.0%	0	0.0%	41.5%	0	0.0%	36.4%
	Upper	0	0.0%	0	0.0%	39.3%	0	0.0%	52.5%	0	0.0%	62.2%	0	0.0%	48.6%	0	0.0%	54.2%
	Unknown	0	0.0%	0	0.0%	0.2%	0	0.0%	0.4%	0	0.0%	0.8%	0	0.0%	0.0%	0	0.0%	0.0%
Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: PA Erie MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	4.1%	0	0.0%	0.9%	0	0.0%	0.2%	0	0.0%	2.4%	0	0.0%	1.2%
	Moderate	3	15.0%	416	35.6%	12.8%	3	25.0%	12.3%	416	47.1%	12.3%	0	0.0%	11.4%	0	0.0%	11.3%
	Middle	13	65.0%	611	52.2%	43.6%	6	50.0%	40.5%	368	41.7%	34.6%	7	87.5%	47.9%	243	84.7%	44.0%
	Upper	4	20.0%	143	12.2%	39.3%	3	25.0%	46.3%	99	11.2%	52.8%	1	12.5%	38.3%	44	15.3%	43.5%
	Unknown	0	0.0%	0	0.0%	0.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	20	100%	1,170	100%	100.0%	12	100%	100%	883	100%	100%	8	100%	100%	287	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	4.1%	0	0.0%	7.7%	0	0.0%	5.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	12.8%	0	0.0%	15.4%	0	0.0%	12.7%	0	0.0%	28.6%	0	0.0%	24.6%
	Middle	0	0.0%	0	0.0%	43.6%	0	0.0%	48.7%	0	0.0%	48.3%	0	0.0%	47.6%	0	0.0%	42.3%
	Upper	0	0.0%	0	0.0%	39.3%	0	0.0%	25.6%	0	0.0%	33.3%	0	0.0%	23.8%	0	0.0%	33.0%
	Unknown	0	0.0%	0	0.0%	0.2%	0	0.0%	2.6%	0	0.0%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	2	1.6%	135	1.0%	4.1%	1	1.2%	2.7%	63	0.7%	1.6%	1	2.6%	3.1%	72	2.0%	1.6%
	Moderate	17	13.8%	1,864	14.2%	12.8%	13	15.3%	12.8%	1,507	15.8%	10.2%	4	10.5%	14.1%	357	10.0%	12.5%
	Middle	57	46.3%	5,006	38.2%	43.6%	34	40.0%	42.8%	3,066	32.2%	34.7%	23	60.5%	43.2%	1,940	54.1%	36.4%
	Upper	47	38.2%	6,107	46.6%	39.3%	37	43.5%	41.4%	4,891	51.3%	53.2%	10	26.3%	39.3%	1,216	33.9%	48.8%
	Unknown	0	0.0%	0	0.0%	0.2%	0	0.0%	0.3%	0	0.0%	0.4%	0	0.0%	0.3%	0	0.0%	0.7%
	Total	123	100%	13,112	100%	100.0%	85	100%	100%	9,527	100%	100%	38	100%	100%	3,585	100%	100%

Originations & Purchases

Based on 2023 FHICL Census Data; 2016-2020 AL's data



Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: PA Nonmetropolitan

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Families by Family Income %	Count			Dollar		Count			Dollar		
		Count #	%	Dollar \$(000s)	%		Bank #	%	Agg %	Bank \$(000s)	%	Bank #	%	Agg %	Bank \$(000s)	%	Agg %
HOME PURCHASE	Low	0	0.0%	0	0.0%	17.2%	0	0.0%	7.3%	0	0.0%	3.8%	0	0.0%	5.8%	0	0.0%
	Moderate	4	36.4%	366	28.7%	19.9%	2	33.3%	29.0%	216	32.6%	22.5%	2	40.0%	24.6%	150	24.5%
	Middle	2	18.2%	402	31.6%	23.1%	0	0.0%	22.0%	0	0.0%	23.2%	2	40.0%	21.3%	402	65.7%
	Upper	4	36.4%	446	35.0%	39.7%	4	66.7%	30.2%	446	67.4%	38.2%	0	0.0%	36.7%	0	0.0%
	Unknown	1	9.1%	60	4.7%	0.0%	0	0.0%	11.4%	0	0.0%	12.3%	1	20.0%	11.6%	60	9.8%
	Total	11	100%	1,274	100%	100.0%	6	100%	100%	662	100%	100%	5	100%	100%	612	100%
REFINANCE	Low	0	0.0%	0	0.0%	17.2%	0	0.0%	6.8%	0	0.0%	4.5%	0	0.0%	11.1%	0	0.0%
	Moderate	2	15.4%	269	17.6%	19.9%	2	15.4%	25.4%	269	17.6%	21.3%	0	0.0%	23.2%	0	0.0%
	Middle	4	30.8%	410	26.9%	23.1%	4	30.8%	24.9%	410	26.9%	24.1%	0	0.0%	30.3%	0	0.0%
	Upper	7	53.8%	848	55.5%	39.7%	7	53.8%	38.0%	848	55.5%	44.1%	0	0.0%	28.3%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	4.9%	0	0.0%	6.1%	0	0.0%	7.1%	0	0.0%
	Total	13	100%	1,527	100%	100.0%	13	100%	100%	1,527	100%	100%	0	0.0%	100%	0	0.0%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	17.2%	0	0.0%	11.8%	0	0.0%	9.0%	0	0.0%	9.7%	0	0.0%
	Moderate	3	33.3%	167	37.3%	19.9%	2	40.0%	23.7%	132	53.4%	24.9%	1	25.0%	18.1%	35	17.4%
	Middle	3	33.3%	166	37.1%	23.1%	2	40.0%	22.6%	70	28.3%	19.4%	1	25.0%	26.4%	96	47.8%
	Upper	3	33.3%	115	25.7%	39.7%	1	20.0%	39.8%	45	18.2%	42.0%	2	50.0%	43.1%	70	34.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.2%	0	0.0%	4.7%	0	0.0%	2.8%	0	0.0%
	Total	9	100%	448	100%	100.0%	5	100%	100%	247	100%	100%	4	100%	100%	201	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	17.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	19.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	23.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	39.7%	0	0.0%	0.0%	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%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	17.2%	0	0.0%	10.8%	0	0.0%	4.2%	0	0.0%	10.3%	0	0.0%
	Moderate	0	0.0%	0	0.0%	19.9%	0	0.0%	21.6%	0	0.0%	15.5%	0	0.0%	10.3%	0	0.0%
	Middle	0	0.0%	0	0.0%	23.1%	0	0.0%	18.9%	0	0.0%	16.1%	0	0.0%	34.5%	0	0.0%
	Upper	0	0.0%	0	0.0%	39.7%	0	0.0%	48.6%	0	0.0%	64.2%	0	0.0%	44.8%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data



Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: PA Nonmetropolitan

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar		
		Count	%	\$ (000s)	\$ %		Bank	Agg	Bank	\$ %	\$ %	Bank	Agg	Bank	\$ %	Agg
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	1	50.0%	30	51.7%	17.2%	0	0.0%	0	0.0%	8.6%	1	50.0%	30	51.7%	12.0%
	Moderate	0	0.0%	0	0.0%	19.9%	0	0.0%	0	0.0%	23.9%	0	0.0%	0	0.0%	14.4%
	Middle	1	50.0%	28	48.3%	23.1%	0	0.0%	0	0.0%	16.7%	1	50.0%	28	48.3%	17.5%
	Upper	0	0.0%	0	0.0%	39.7%	0	0.0%	0	0.0%	48.3%	0	0.0%	0	0.0%	56.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	2.5%	0	0.0%	0	0.0%	0.0%
	Total	2	100%	58	100%	100.0%	0	0.0%	0	0.0%	100%	2	100%	58	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	17.2%	0	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	19.9%	0	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	23.1%	0	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	39.7%	0	0.0%	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	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%
HMDA TOTALS	Low	1	2.9%	30	0.9%	17.2%	0	0.0%	0	0.0%	4.5%	1	9.1%	30	3.4%	4.9%
	Moderate	9	25.7%	802	24.3%	19.9%	6	25.0%	617	25.3%	21.6%	3	27.3%	185	21.2%	15.9%
	Middle	10	28.6%	1,006	30.4%	23.1%	6	25.0%	480	19.7%	22.3%	4	36.4%	526	60.4%	22.8%
	Upper	14	40.0%	1,409	42.6%	39.7%	12	50.0%	1,339	55.0%	41.2%	2	18.2%	70	8.0%	47.1%
	Unknown	1	2.9%	60	1.8%	0.0%	0	0.0%	0	0.0%	10.4%	1	9.1%	60	6.9%	9.3%
	Total	35	100%	3,307	100%	100.0%	24	100%	2,456	100%	100%	11	100%	871	100%	100%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: PA Nonmetropolitan

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Owner Occupied Units	Count			Dollar		Count			Dollar			
		Count		Dollar			Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	8	72.7%	640	50.2%	83.7%	4	66.7%	82.9%	266	40.2%	81.3%	4	80.0%	88.4%	374	61.1%	87.5%
	Upper	3	27.3%	634	49.8%	16.3%	2	33.3%	17.1%	396	59.8%	18.7%	1	20.0%	11.6%	238	38.9%	12.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	11	100%	1,274	100%	100.0%	6	100%	100%	662	100%	100%	5	100%	100%	612	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	11	84.6%	1,207	79.0%	83.7%	11	84.6%	81.5%	1,207	79.0%	78.5%	0	0.0%	81.8%	0	0.0%	83.2%
	Upper	2	15.4%	320	21.0%	16.3%	2	15.4%	18.5%	320	21.0%	21.5%	0	0.0%	18.2%	0	0.0%	16.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	13	100%	1,527	100%	100.0%	13	100%	100%	1,527	100%	100%	0	0.0%	100%	0	0.0%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	4	44.4%	197	44.0%	83.7%	2	40.0%	81.7%	132	53.4%	84.0%	2	50.0%	83.3%	65	32.3%	86.1%
	Upper	5	55.6%	251	56.0%	16.3%	3	60.0%	18.3%	115	46.6%	16.0%	2	50.0%	16.7%	136	67.7%	13.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	9	100%	448	100%	100.0%	5	100%	100%	247	100%	100%	4	100%	100%	201	100%	100%
MULTI FAMILY		Multi-Family Units																
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	99.4%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.6%	0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.0%	0	0.0%	0.0%
Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	83.7%	0	0.0%	70.3%	0	0.0%	68.3%	0	0.0%	86.2%	0	0.0%	91.6%
	Upper	0	0.0%	0	0.0%	16.3%	0	0.0%	29.7%	0	0.0%	31.7%	0	0.0%	13.8%	0	0.0%	8.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: PA Nonmetropolitan

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Count		Bank Dollar		Owner Occupied Units	Count		Dollar				Count		Dollar			
		#	%	\$ (000s)	%		#	%	\$ (000s)	%	%	%	#	%	\$ (000s)	%	%	%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	2	100.0%	58	100.0%	83.7%	0	0.0%	73.3%	0	0.0%	80.9%	2	100.0%	89.1%	58	100.0%	83.6%
	Upper	0	0.0%	0	0.0%	16.3%	0	0.0%	26.7%	0	0.0%	19.1%	0	0.0%	10.9%	0	0.0%	16.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	2	100%	58	100%	100.0%	0	0.0%	100%	0	0.0%	100%	2	100%	100%	58	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	83.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	16.3%	0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	25	71.4%	2,102	63.6%	83.7%	17	70.8%	81.2%	1,605	65.9%	80.3%	8	72.7%	86.2%	497	57.1%	86.7%
	Upper	10	28.6%	1,205	36.4%	16.3%	7	29.2%	18.8%	831	34.1%	19.7%	3	27.3%	13.8%	374	42.9%	13.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	35	100%	3,307	100%	100.0%	24	100%	100%	2,436	100%	100%	11	100%	100%	871	100%	100%

Originations & Purchases  
Based on 2023 FHFL Census Data; 2018-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: OH Cleveland-Elyria MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Families by Family Income %	Count			Dollar		Count			Dollar			
		Count	%	\$ (000s)	\$ %		Bank	%	Agg	Bank	%	Agg	Bank	%	Agg	Bank	%	Agg
HOME PURCHASE	Low	0	0.0%	0	0.0%	17.0%	0	0.0%	9.8%	0	0.0%	5.6%	0	0.0%	8.4%	0	0.0%	4.2%
	Moderate	4	50.0%	430	31.2%	16.8%	2	50.0%	24.7%	148	41.7%	18.6%	2	50.0%	22.8%	282	27.6%	16.7%
	Middle	2	25.0%	207	15.0%	21.5%	2	50.0%	20.2%	207	58.3%	20.5%	0	0.0%	21.4%	0	0.0%	21.7%
	Upper	1	12.5%	200	14.5%	44.7%	0	0.0%	28.3%	0	0.0%	39.2%	1	25.0%	26.1%	200	19.6%	35.6%
	Unknown	1	12.5%	540	39.2%	0.0%	0	0.0%	17.1%	0	0.0%	16.2%	1	25.0%	21.3%	540	52.8%	21.9%
	Total	8	100%	1,377	100%	100.0%	4	100%	100%	355	100%	100%	4	100%	100%	1,022	100%	100%
REFINANCE	Low	1	8.3%	60	5.4%	17.0%	0	0.0%	11.9%	0	0.0%	7.2%	1	33.3%	13.5%	60	19.5%	9.4%
	Moderate	6	50.0%	522	47.0%	16.8%	5	55.6%	23.0%	434	54.1%	18.7%	1	33.3%	23.9%	88	28.6%	21.1%
	Middle	3	25.0%	267	24.1%	21.5%	3	33.3%	28.7%	267	33.3%	28.7%	0	0.0%	28.2%	0	0.0%	28.8%
	Upper	2	16.7%	261	23.5%	44.7%	1	11.1%	29.1%	101	12.6%	37.0%	1	33.3%	28.6%	160	51.9%	33.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	7.3%	0	0.0%	8.4%	0	0.0%	5.8%	0	0.0%	7.0%
	Total	12	100%	1,110	100%	100.0%	9	100%	100%	802	100%	100%	3	100%	100%	308	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	17.0%	0	0.0%	8.8%	0	0.0%	7.7%	0	0.0%	10.7%	0	0.0%	7.4%
	Moderate	3	30.0%	89	15.3%	16.8%	1	16.7%	20.1%	20	6.7%	15.9%	2	50.0%	18.7%	69	24.6%	14.0%
	Middle	0	0.0%	0	0.0%	21.5%	0	0.0%	26.4%	0	0.0%	21.8%	0	0.0%	22.5%	0	0.0%	22.0%
	Upper	7	70.0%	491	84.7%	44.7%	5	83.3%	42.2%	280	93.3%	52.6%	2	50.0%	43.5%	211	75.4%	53.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.4%	0	0.0%	2.0%	0	0.0%	4.6%	0	0.0%	3.6%
	Total	10	100%	580	100%	100.0%	6	100%	100%	300	100%	100%	4	100%	100%	280	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	17.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	16.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	44.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	17.0%	0	0.0%	8.3%	0	0.0%	5.8%	0	0.0%	10.0%	0	0.0%	5.4%
	Moderate	0	0.0%	0	0.0%	16.8%	0	0.0%	24.1%	0	0.0%	21.8%	0	0.0%	23.0%	0	0.0%	20.2%
	Middle	0	0.0%	0	0.0%	21.5%	0	0.0%	26.9%	0	0.0%	27.1%	0	0.0%	24.0%	0	0.0%	24.6%
	Upper	0	0.0%	0	0.0%	44.7%	0	0.0%	39.5%	0	0.0%	44.9%	0	0.0%	39.5%	0	0.0%	47.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.2%	0	0.0%	0.4%	0	0.0%	3.5%	0	0.0%	2.6%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Cleveland-Elyria MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	\$%	%	#	%	%	\$(000s)	0%	\$%	#	%	%	\$(000s)	\$%	\$%		
OTHER PURPOSE CLOSED/EXEMPT	Low	1	14.3%	30	10.8%	17.0%	0	0.0%	9.5%	0	0.0%	3.0%	1	25.0%	10.7%	30	17.6%	9.5%
	Moderate	2	28.6%	78	28.2%	16.8%	2	66.7%	23.0%	78	72.9%	13.3%	0	0.0%	21.4%	0	0.0%	23.4%
	Middle	3	42.9%	109	39.4%	21.5%	1	33.3%	18.9%	29	27.1%	16.8%	2	50.0%	34.5%	80	47.1%	21.7%
	Upper	1	14.3%	60	21.7%	44.7%	0	0.0%	40.5%	0	0.0%	45.9%	1	25.0%	31.0%	60	35.3%	43.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	8.1%	0	0.0%	21.1%	0	0.0%	2.4%	0	0.0%	2.3%
	Total	7	100%	277	100%	100.0%	3	100%	100%	107	100%	100%	4	100%	100%	170	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	17.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	16.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	7.1%	0	0.0%	8.2%
	Middle	0	0.0%	0	0.0%	21.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	44.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	92.9%	0	0.0%	91.8%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	2	5.4%	90	2.7%	17.0%	0	0.0%	10.1%	0	0.0%	5.8%	2	13.3%	9.7%	90	5.1%	5.1%
	Moderate	15	40.5%	1,119	33.5%	16.8%	10	45.5%	23.4%	680	43.5%	17.9%	5	33.3%	22.4%	439	24.7%	17.0%
	Middle	8	21.6%	583	17.4%	21.5%	6	27.3%	23.4%	503	32.2%	22.1%	2	13.3%	23.3%	80	4.5%	22.3%
	Upper	11	29.7%	1,012	30.3%	44.7%	6	27.3%	30.7%	381	24.4%	38.1%	5	33.3%	29.5%	631	35.4%	35.8%
	Unknown	1	2.7%	540	16.1%	0.0%	0	0.0%	12.4%	0	0.0%	16.1%	1	6.7%	15.1%	540	30.3%	19.8%
	Total	37	100%	3,344	100%	100.0%	22	100%	100%	1,564	100%	100%	15	100%	100%	1,780	100%	100%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: OH Cleveland-Elyria MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units	Count			Dollar			Count	Dollar		
		Count	Dollar				Bank	Agg		Bank	Agg		Bank	Agg		
		#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	%
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	12.5%	92	6.7%	17.1%	1	25.0%	23.1%	92	25.9%	17.3%	0	0.0%	18.7%	13.4%
	Middle	5	62.5%	1,141	82.9%	41.2%	2	50.0%	38.0%	201	56.6%	35.2%	3	75.0%	40.4%	37.1%
	Upper	2	25.0%	144	10.5%	41.7%	1	25.0%	38.9%	62	17.5%	47.5%	1	25.0%	40.9%	49.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	8	100%	1,377	100%	100.0%	4	100%	100%	355	100%	100%	4	100%	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	3	25.0%	243	21.9%	17.1%	2	22.2%	15.0%	183	22.8%	9.9%	1	33.3%	15.3%	11.1%
	Middle	9	75.0%	867	78.1%	41.2%	7	77.8%	39.7%	619	77.2%	38.2%	2	66.7%	37.9%	37.8%
	Upper	0	0.0%	0	0.0%	41.7%	0	0.0%	45.4%	0	0.0%	51.9%	0	0.0%	46.8%	51.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	12	100%	1,110	100%	100.0%	9	100%	100%	802	100%	100%	3	100%	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.1%	0	0.0%	14.0%	0	0.0%	9.9%	0	0.0%	10.7%	5.6%
	Middle	8	80.0%	515	88.8%	41.2%	4	66.7%	34.0%	235	78.3%	34.1%	4	100.0%	31.7%	27.8%
	Upper	2	20.0%	65	11.2%	41.7%	2	33.3%	52.0%	65	21.7%	56.0%	0	0.0%	57.6%	66.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	10	100%	580	100%	100.0%	6	100%	100%	300	100%	100%	4	100%	100%	100%
MULTI FAMILY	Multi-Family Units															
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	46.2%	0	0.0%	81.8%	0	0.0%	74.6%	0	0.0%	66.7%	9.3%
	Middle	0	0.0%	0	0.0%	23.3%	0	0.0%	18.2%	0	0.0%	25.4%	0	0.0%	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	30.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	33.3%	90.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.1%	0	0.0%	11.9%	0	0.0%	8.9%	0	0.0%	14.0%	12.6%
	Middle	0	0.0%	0	0.0%	41.2%	0	0.0%	38.3%	0	0.0%	35.6%	0	0.0%	32.5%	29.5%
	Upper	0	0.0%	0	0.0%	41.7%	0	0.0%	49.8%	0	0.0%	55.4%	0	0.0%	53.5%	58.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	100%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Cleveland-Elyria MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$(000s)	%		Bank #	%	Agg %	Bank \$(000s)	%	Agg %	Bank #	%	Agg %	Bank \$(000s)	%	Agg %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	1	14.3%	29	10.5%	17.1%	1	33.3%	18.9%	29	27.1%	14.3%	0	0.0%	15.5%	0	0.0%	16.4%
	Middle	3	42.9%	79	28.5%	41.2%	1	33.3%	40.5%	14	13.1%	40.6%	2	50.0%	44.0%	65	38.2%	43.5%
	Upper	3	42.9%	169	61.0%	41.7%	1	33.3%	40.5%	64	59.8%	45.1%	2	50.0%	40.5%	105	61.8%	40.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	7	100%	277	100%	100.0%	3	100%	100%	107	100%	100%	4	100%	100%	170	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.1%	0	0.0%	36.0%	0	0.0%	27.4%	0	0.0%	28.6%	0	0.0%	26.9%
	Middle	0	0.0%	0	0.0%	41.2%	0	0.0%	44.0%	0	0.0%	46.0%	0	0.0%	64.3%	0	0.0%	68.5%
	Upper	0	0.0%	0	0.0%	41.7%	0	0.0%	20.0%	0	0.0%	26.5%	0	0.0%	7.1%	0	0.0%	4.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	5	13.5%	364	10.9%	17.1%	4	18.2%	19.3%	304	19.4%	16.6%	1	6.7%	16.8%	60	3.4%	12.7%
	Middle	25	67.6%	2,602	77.8%	41.2%	14	63.6%	38.1%	1,069	68.4%	35.8%	11	73.3%	38.6%	1,533	86.1%	35.8%
	Upper	7	18.9%	378	11.3%	41.7%	4	18.2%	42.5%	191	12.2%	47.7%	3	20.0%	44.6%	187	10.5%	51.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	37	100%	3,344	100%	100.0%	22	100%	100%	1,564	100%	100%	15	100%	100%	1,780	100%	100%

Originations & Purchases  
Based on 2023 FHICL Census Data; 2016-2020 ACS data



## Home Equity Lending Tables

### Borrower Distribution of Home Equity Loans

Assessment Area: PA Erie MSA

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	20.6%
Moderate	1	11.1%	25	3.0%	17.6%
Middle	2	22.2%	85	10.3%	21.3%
Upper	6	66.7%	718	86.7%	40.6%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	9	100.0%	828	100.0%	100.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Home Equity Loans

Assessment Area: PA Erie MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Owner Occupied Units
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	4.1%
Moderate	1	11.1%	53	6.4%	12.8%
Middle	2	22.2%	55	6.6%	43.6%
Upper	6	66.7%	720	87.0%	39.3%
Unknown	0	0.0%	0	0.0%	0.2%
<i>Total</i>	9	100%	828	100%	100.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding



### Borrower Distribution of Home Equity Loans

Assessment Area: PA Nonmetropolitan

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	1	25.0%	30	19.9%	17.2%
Moderate	0	0.0%	0	0.0%	19.9%
Middle	0	0.0%	0	0.0%	23.1%
Upper	3	75.0%	121	80.1%	39.7%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>151</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Home Equity Loans

Assessment Area: PA Nonmetropolitan

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Owner Occupied Units
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%
Middle	2	50.0%	88	58.3%	83.7%
Upper	2	50.0%	63	41.7%	16.3%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>4</b>	<b>100%</b>	<b>151</b>	<b>100%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Borrower Distribution of Home Equity Loans

Assessment Area: OH Cleveland-Elyria MSA

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	17.0%
Moderate	1	12.5%	107	11.2%	16.8%
Middle	2	25.0%	175	18.3%	21.5%
Upper	5	62.5%	675	70.5%	44.7%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>957</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Home Equity Loans

Assessment Area: OH Cleveland-Elyria MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Owner Occupied Units
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	2	25.0%	299	31.2%	17.1%
Middle	5	62.5%	608	63.5%	41.2%
Upper	1	12.5%	50	5.2%	41.7%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>8</b>	<b>100%</b>	<b>957</b>	<b>100%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

## Consumer Lending Tables

### Borrower Distribution of Consumer Loans

Assessment Area: PA Erie MSA

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households by Household Income
	#	%	\$ (000s)	\$ %	%
Low	1	14.3%	4	8.2%	24.7%
Moderate	4	57.1%	21	42.9%	16.1%
Middle	1	14.3%	8	16.3%	17.1%
Upper	1	14.3%	17	34.7%	42.0%
Unknown	0	0.0%	0	0.0%	
<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Consumer Loans

Assessment Area: PA Erie MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	8.8%
Moderate	0	0.0%	0	0.0%	18.2%
Middle	6	85.7%	33	67.3%	40.1%
Upper	1	14.3%	17	34.7%	31.9%
Unknown	0	0.0%	0	0.0%	1.0%
<b>Total</b>	<b>7</b>	<b>100%</b>	<b>49</b>	<b>100%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Borrower Distribution of Consumer Loans

Assessment Area: PA Nonmetropolitan

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households by Household Income
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	21.3%
Moderate	0	0.0%	0	0.0%	16.7%
Middle	1	100.0%	22	100.0%	20.0%
Upper	0	0.0%	0	0.0%	42.1%
Unknown	0	0.0%	0	0.0%	
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Consumer Loans

Assessment Area: PA Nonmetropolitan

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%
Middle	1	100.0%	22	100.0%	84.7%
Upper	0	0.0%	0	0.0%	15.3%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>1</b>	<b>100%</b>	<b>22</b>	<b>100%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Borrower Distribution of Consumer Loans

Assessment Area: OH Cleveland-Elyria MSA

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households by Household Income
	#	%	\$ (000s)	\$ %	%
Low	1	50.0%	1	4.2%	18.0%
Moderate	0	0.0%	0	0.0%	15.6%
Middle	0	0.0%	0	0.0%	17.0%
Upper	1	50.0%	23	95.8%	49.5%
Unknown	0	0.0%	0	0.0%	
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Consumer Loans

Assessment Area: OH Cleveland-Elyria MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	25.2%
Middle	2	100.0%	24	100.0%	38.3%
Upper	0	0.0%	0	0.0%	36.5%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>2</b>	<b>100%</b>	<b>24</b>	<b>100%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

## Appendix E – 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:** 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, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**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 lines of credit, 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 nonrelatives 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 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 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 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 an 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 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) 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 Reports 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 geography.