



PUBLIC DISCLOSURE

March 9, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Dollar Bank, Federal Savings Bank
Charter Number: 708043

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Pittsburgh, PA 15222-10043

Office of the Comptroller of the Currency

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of Dollar Bank, Federal Savings Bank, with respect to the Lending, Investment, and Service Tests:

Performance Levels	Dollar Bank, Federal Savings Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the High Satisfactory performance in the states of Pennsylvania and Virginia, and Outstanding performance in Ohio.
- The Investment Test rating is primarily based on the Outstanding performance in the state of Pennsylvania and High Satisfactory performance in Ohio and Virginia.
- The Service Test rating is primarily based on the Outstanding performance in the state of Pennsylvania, and High Satisfactory performance in Ohio and Virginia.

Lending in Assessment Area

A high percentage of the bank’s loans are in in its assessment areas (AA).

The bank originated and purchased 84.1 percent of its total loans inside the bank’s assessment areas (AAs) during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. Performance was considered positive in the analysis of the geographic distribution of loans.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	23,833	83.3	4,770	16.7	28,603	3,033,216	62.6	1,813,542	37.4	4,846,758
Small Business	2,372	93.4	167	6.6	2,539	284,080	90.0	31,404	10.0	315,484
Total	26,205	84.1	4,937	15.9	31,142	3,317,296	64.3	1,844,946	35.7	5,162,242

Product Innovation and Flexibility

The bank makes extensive use of flexible lending practices in order to serve AA credit needs. Dollar Bank participates in several state and federal programs targeted to LMI borrowers in the AA. Three of the more significant programs include:

- Home Works Home Loan - offers loans up to \$50 thousand with extended repayment terms to help lower monthly payments and offers expanded underwriting standards. The bank originated 534 loans totaling \$10.7 million in all AAs.
- 3-2-1 Match Program - offers home loans with grants to LMI applicants in the AAs. In addition to teaching potential first time homebuyer budgeting skills and preparing them for the home buying experience, the bank matches up to \$3 thousand for the first \$1 thousand that borrowers make towards a down payment. The bank originated 270 loans totaling \$21.1 million in all AAs.
- The bank has approved a \$500 thousand loan portfolio allocation (\$300 thousand for the Pittsburgh MSA AA, \$100 thousand for the Cleveland MSA AA, and \$100 thousand for the Virginia Beach MSA AA) and developed relationships with a business incubator in each of its three AAs as a way to connect with LMI entrepreneurs. During the evaluation period, commitments totaling \$115 thousand were issued to four small, disadvantaged businesses in the Pittsburgh MSA AA.

Community Development Services

During the evaluation period, and going back over the past 21 years, Dollar has developed an annual homebuyer workshop titled Mortgages for Mothers. During this half day workshop, female heads of household learn the importance and the power of good credit. In 2014, the bank launched the Mortgages for Men workshop. This workshop was created when it appeared that low- and moderate-income men looking to buy their first home thought they were not eligible for Dollar’s first-time homeowners’ program because they were not single, female heads of household. This workshop, similar to Mortgages for Mothers, helps single men learn about good credit and homeownership. Please see the community development (CD) services section in each rating area for details on workshops held in each of the bank’s AAs.

Description of Institution

Dollar Bank, Federal Savings Bank (Dollar Bank, Dollar, or “the bank”) is an interstate, mutual thrift headquartered in Pittsburgh, Pennsylvania. In March 2017, Dollar Bank completed a merger with Progressive Home Federal Savings and Loan in Dormont, PA. and in November 2017 completed the

merger with Virginia Beach-based Bank @lantec. In December 2018, the bank completed a reorganization from a mutual savings bank to a mutual holding company, Dollar Mutual Bancorp. Dollar has nine operating subsidiaries: Colton Enterprise, Inc., Dollar Finance Inc., Dollar Bank Insurance Agency, Dollar Bank Leasing Corp., Fourth Avenue Finance LL, Dollar Bank Settlement Services, Inc., The New Market Corporation, CFS Service Corporation, and Citizens Service Corporation. These subsidiaries are not included with the scope of this public evaluation.

Dollar Bank operates 74 branches with 39 in Pennsylvania, 29 in Ohio, and six in Virginia. In Pennsylvania, the bank has delineated Allegheny, Westmoreland, Washington and Butler counties as the Pittsburgh AA. In Ohio, Dollar has delineated Cuyahoga, Lake, Lorain, Medina and Summit counties as the Cleveland/Akron AA. In Virginia, the bank has delineated the independent cities of Chesapeake, Norfolk and Virginia Beach as the Virginia Beach/Norfolk AA. The bank operates 131 deposit-taking automated teller machines; 70 in the Pittsburgh AA, 47 in the Cleveland/Akron AA, and 14 in the Virginia Beach/Norfolk AA.

Dollar Bank is a full-service bank that offers a standard selection of traditional loan and deposit products for both personal and business customers. The bank offers a variety of different account access alternatives including telephone banking, online banking with bill pay options, e-statements, and a mobile banking application. In addition to the services for consumers the bank also offers a wide variety of account access alternatives for their business customers, which include online banking for business customers, cash management services, automated clearing house manager, and credit card services.

The following table provides basic bank financial information as of the beginning of the first year (except for Net Income) and fourth year of the evaluation period:

Financial Information					
Loan Mix	01/01/2016		12/31/2019		% Growth / (Decline) in Period
	Balance Sheet \$ Amount (000)	% of Total Loans	Balance Sheet \$ Amount (000)	% of Total Loans	
Real Estate	5,293,926	88.8	6,299,041	86.1	19.0
Commercial & Industrial Loans	476,966	8.0	716,351	9.8	50.2
Consumer Loans	123,875	2.1	279,824	3.8	125.9
Other Loans and Leases	69,192	1.1	22,429	.03	(67.6)
Assets, Liabilities & Capital (000s)					
Total Assets		7,347,353		9,043,235	23.1
Total Deposits		5,794,494		6,958,845	20.1
Net Income	(Year end 2016)	52,389		70,758	35.1
Tier 1 Capital		826,557		1,082,399	30.8

Source: FFIEC Call Reports

There are no legal, financial, or other impediments to Dollar Bank's ability to help meet the credit needs within its communities.

Dollar Bank received an Outstanding rating at its prior CRA evaluation by the OCC dated January 9, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the large retail bank Lending, Investment, and Service Tests. The evaluation period is January 1, 2016 to December 31, 2019.

In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA. All home mortgage products were reviewed, and conclusions reached in the aggregate. The bank made no reportable farm loans during the evaluation period. CD loans were also reviewed.

Under the Lending Test geographic distribution and borrower income distribution criteria, we performed separate analyses of 2016 data and 2017 through 2019 data. This is due to changes instituted by the 2015 American Community Survey (ACS), which updated income, population, and housing information. The ACS also resulted in changes to the income designations of some geographies. The changes became effective January 1, 2017.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in the subsequent evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings. The state of Pennsylvania rating area carried the greatest emphasis in the OCC's conclusions as this area represented Dollar Bank's most significant market with approximately 69 percent of bank deposits, 73 percent of HMDA and small loans to businesses originated and purchased, and 53 percent of the branch network. We placed more weight on the bank's HMDA lending as this represented the substantial majority of the bank's lending within all AAs. Refer to the "Scope" section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Ohio

CRA rating for the State of Ohio:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Excellent geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and business of different sizes.
- Extensive use of innovative and/or flexible lending practices.
- Good level of qualified CD investments and grants that were responsive to AA needs. Qualified investments were effective and responsive in helping the bank address community needs. The bank made a significant number of investments, grants and donations under its programs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- An adequate level of CD services.

Description of Institution's Operations in Ohio

Dollar Bank has delineated two AAs within the state of Ohio. They include Summit County within the Akron, OH MSA and Cuyahoga, Lake, Lorain, and Medina within the Cleveland, OH MSA. The two AAs were combined and evaluated as the Cleveland CSA. Refer to appendix A for a complete description of the AA. The AA does not arbitrarily exclude any LMI geographies. Dollar Bank operated 29 branches and 47 ATMs in this AA.

Dollar Bank had approximately \$2 billion deposits in the AA, which represents 28.5 percent of the bank's total deposits. The bank ranks 10th out of 40 depository institutions with 2.4 percent market share. The top three banks, each with much larger branch networks and market share in the AA, include KeyBank with 21.2 percent, Huntington National Bank with 16.5 percent, and PNC Bank with 13.4 percent.

The following table provides a summary of the demographics that includes housing and business information for the Cleveland CSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cleveland CSA – 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	750	16.9	22.1	35.1	25.2	0.7
Population by Geography	2,525,632	10.8	19.0	37.5	32.7	0.0
Housing Units by Geography	1,160,649	12.9	20.9	37.4	28.8	0.0
Owner-Occupied Units by Geography	701,143	6.0	15.8	41.0	37.3	0.0
Occupied Rental Units by Geography	333,815	21.4	29.1	33.8	15.6	0.0
Vacant Units by Geography	125,691	28.7	28.1	27.2	16.0	0.0
Businesses by Geography	156,197	8.3	14.4	36.6	40.3	0.3
Farms by Geography	3,609	2.9	10.3	43.0	43.8	0.0
Family Distribution by Income Level	652,225	22.0	17.5	20.9	39.6	0.0
Household Distribution by Income Level	1,034,958	25.2	15.8	17.8	41.3	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$62,882	Median Housing Value			\$147,067
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$62,627	Median Gross Rent			\$713
			Families Below Poverty Level			10.4%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cleveland CSA – 2017 to 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	752	19.5	23.1	31.9	23.8	1.6
Population by Geography	2,512,456	12.9	20.9	34.1	31.7	0.4
Housing Units by Geography	1,164,679	14.6	23.1	33.8	28.0	0.5
Owner-Occupied Units by Geography	669,800	7.0	17.5	38.0	37.3	0.1
Occupied Rental Units by Geography	363,936	23.3	30.7	29.4	15.6	1.0
Vacant Units by Geography	130,943	29.5	30.5	24.0	15.0	1.0
Businesses by Geography	181,509	9.4	16.6	32.7	40.5	0.7
Farms by Geography	4,225	4.8	12.9	40.0	42.2	0.1
Family Distribution by Income Level	633,262	23.0	16.8	19.7	40.5	0.0
Household Distribution by Income Level	1,033,736	26.2	15.6	16.8	41.5	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$134,951
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Median Gross Rent			\$761
			Families Below Poverty Level			11.7%

Source: 2015 ACS Census and 2019 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

When looking at housing affordability, the Cleveland CSA has a relatively low cost of living that makes homeownership affordable for most LMI persons. The table below illustrates housing affordability calculations for the two MSAs included in the bank’s Cleveland CSA AA. The monthly mortgage payment calculations assume a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner’s insurance, real estate taxes, or any additional monthly expenses. The maximum low-income and maximum moderate-income annual income calculations are based on 50 percent and 80 percent of the 2019 FFIEC adjusted median family income for the MSA, respectively. As the table illustrates, only low-income borrowers in the Cleveland MSA would be challenged to afford a mortgage at the median home sales price.

MSA Name	2019 Updated MFI	Maximum Low-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	Maximum Moderate-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	2019 Median Home Sales Price*	Mortgage Payment Based on Sales Price
Akron MSA	72,300	36,150	168,352	904	57,840	269,363	1,446	151,000	811
Cleveland MSA	73,700	36,850	171,612	921	58,960	274,579	1,474	179,950	966

*Source – Realtor.com 2019 MSA median housing list price.

Economic Data

Cleveland, OH MSA

Based on data from the 2019 Moody’s Analytics report, Cleveland-Elyria’s economic growth slowed slightly during 2019, but was strong overall throughout the evaluation period. The MSA fell behind the economies of Columbus and Cincinnati in 2019. Payroll employment remained slightly higher than at the beginning of 2019 despite volatility throughout the year. This was primarily driven by declines in construction, wholesale trade, and retail services, while sectors such as healthcare, professional/business services, and leisure/hospitality added jobs during the year. The healthcare sector is likely to experience job growth in the future while manufacturing is expected to decline. This is primarily due to demographic issues surrounding an aging population and the levels of out-migration.

Key sectors of the economy based on percentage of total employment include Education and Health Services, Professional and Business Services, Government, and Manufacturing. Major employers in the MSA include the Cleveland Clinic Foundation, University Hospitals, Progressive Corporation, Giant Eagle, Inc., and MetroHealth System.

According to the U.S. Bureau of Labor Statistics (BLS), the Cleveland-Elyria-Mentor unemployment rate declined throughout the evaluation period. In 2016, the rate was 5.4 percent compared to 4.4 percent in 2019. The unemployment rate in the MSA was slightly higher than the overall rate for the state of Ohio, which were 5.2 percent and 4.1 percent during the same time periods.

Akron, OH MSA

Based on data from the 2019 Moody’s Analytics report, Akron’s economy slowed in 2019 and is underperforming in line with the broader Ohio and U.S. economies. Payroll employment continued its flat trend over the last four years with job losses in numerous sectors. This included the factory sector, professional/business services, consumer industries, and wholesale trade. The labor market weakness is

evident by the \$2 decline in average hourly earnings since the end of 2018. Despite MSA economic performance during the evaluation period, Moody's did identify that health services may become a growing industry in Akron in part due to the MSA's aging population.

Key sectors of the economy based on percentage of total employment include Education and Health Services, Professional and Business Services, Government, and Manufacturing. Major employers in the Akron MSA include the Summa Health System, Akron General Health System, Kent State University, Akron Children's Hospital, and Goodyear Tire & Rubber Company.

According to the BLS, the unemployment rate decreased slightly through the evaluation period. In 2016 the rate was 5.1 percent compared to 4.3 percent in 2019. The unemployment rate was comparable to the rate for the state of Ohio, which were 5.2 percent and 4.1 percent during the same time periods.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the Cleveland CSA AA to determine local economic conditions and community needs. These contacts identified small business loans, financial literacy to both individuals and small businesses, and technical assistance to small businesses as community needs.

Scope of Evaluation in Ohio

The OCC conducted a full-scope review of the Cleveland CSA AA. The AA combines the Cleveland-Elyria-Mentor and Akron MSAs for analysis. The AA represents 23 percent of the bank's total home mortgage lending, 39 percent of the total number of branches, and 28 percent of total deposits. Home mortgage loans were given substantially more weight than small business loans when arriving at the bank's overall lending performance based on the volume of loans. Refer to the table in appendix A for a list of AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

The bank's performance under the Lending Test in Ohio is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cleveland MMSA AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Cleveland CSA	5,974	718	2	6,694

Dollar Volume of Loans (\$000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Cleveland CSA	\$703,531	\$86,357	\$200	\$790,988

According to the June 30, 2019 FDIC deposit market share information, Dollar Bank ranked tenth in total deposits within the AA, with a 2.4 percent market share. The bank's deposit rank placed them in the top 25.0 percent of all depository institutions in the AA. Based on 2018 peer mortgage data, Dollar Bank ranked 15th with a 1.8 percent market share. The bank's rank placed them in the top 3.0 percent of all mortgage lenders in the AA. There was very strong competition as reflected by the 504 lenders and 40 deposit-taking institutions within the AA. The top two lenders were the Huntington National Bank with 12.9 percent and Third Federal Savings and Loan with 9.3 percent.

According to 2018 peer small business data, Dollar Bank ranked 24th with a market share of 0.4 percent. The bank's rank placed them in the top 17.4 percent of all small business lenders in the AA. There was strong competition as reflected by 138 lenders in the market. The top two small business lenders were American Express with 17.5 percent and Chase Bank USA with 16.5 percent. Six of the top ten lenders were nationwide financial institutions with large business credit card portfolios that together capture over 57 percent of the market. When considering those institutions that were primarily commercial lenders, Dollar Bank's rank moved to 4th out of approximately 80 lenders, which placed them in the top 5.0 percent of these lenders.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The distribution of the bank's home mortgage loans in low- and moderate-income geographies is excellent. The bank's performance exceeded the aggregate distribution of loans in both analysis periods. Additionally, when comparing the aggregate percentage of loans to demographics in both analysis periods and in low- and moderate-income geographies, Dollar's performance either met or was stronger than the aggregate performance. While the proportion of bank and aggregate loans in LMI geographies was below the proportion of owner-occupied housing in those geographies, declining property values reflected in Table A from the 2010 census data to the 2015 ACS indicate adverse economic conditions

are affecting housing values negatively, creating barriers to lending. Generally, those conditions are likely to impact LMI areas more severely.

Small Loans to Businesses

Refer to Table Q in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The distribution of the bank's small loans to businesses in low- and moderate-income geographies is excellent. In both analysis periods, the proportion of loans was stronger than both the proportion of businesses and the aggregate distribution of loans in low-income geographies, and generally stronger in moderate-income geographies.

Lending Gap Analysis

OCC examiners reviewed summary reports and AA maps detailing the bank's lending activity over the evaluation period for home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of the bank's home mortgage loans to low- and moderate-income borrowers is generally strong. In both analysis periods, the proportion of loans to low-income borrowers was below the proportion of low-income families but stronger than the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was stronger than the proportion of moderate-income families and the aggregate distribution of loans in both analysis periods. Although the proportion of loans to low-income borrowers was lower than the proportion of low-income families, the bank and industry performance was impacted by the ratio of median homes sales prices to income in portions of the AA. As discussed in the Description of Institution's Operations in Ohio section, low-income borrowers in the Akron MSA would have been challenged to afford a mortgage at the median home sales price. Further, for very low-income families, income levels and limited savings typically preclude homeownership, given the high transaction costs associated with home purchase.

Small Loans to Businesses

Refer to Table R in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of the bank's small loans to businesses by revenue is generally strong. In both analysis periods, the proportion of bank loans was below the proportion of small businesses, but significantly stronger than the aggregate distribution of loans. Additionally, compared to the ratio of aggregate loans

to small businesses to demographics in both analysis periods, Dollar's performance was stronger than the aggregate performance.

Community Development Lending

The institution has made few, if any, CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Dollar Bank made one CD loan in the AA totaling \$100 thousand to a qualifying organization to support its first-time homebuyer program for LMI individuals. The bank provided a \$100 thousand loan commitment to a small business incubator that supports LMI entrepreneurs. Refer to the Overall CRA Rating section for additional information about this program. This performance has a neutral impact on Dollar's lending test performance in the AA, as its lending activity levels, and geographic and borrower performance indicate the bank's existing products effectively address community credit needs.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices that contribute positively to serving AA credit needs. Dollar Bank offers several lending programs to assist LMI borrowers obtain home loans and to address small business lending needs. The home loan programs assist borrowers with closing costs and offer loan terms that are more affordable to borrowers, including LMI borrowers and first-time homebuyers. Refer to the Overall CRA Rating section for information on these programs. Following are examples.

- Rent-No-More Community Mortgage allows income eligible borrowers to include closing costs in their mortgage financing, up to 100 percent of the value of the home, without a private mortgage insurance requirement. A total of 200 LMI borrowers received loans totaling \$15.6 million.
- The Home Works Home Loan offers loans up to \$50,000 with extended repayment terms to 180 months to help lower monthly payments. A total of 15 LMI borrowers or borrowers in LMI geographies received loans totaling \$259 thousand. A total of 56 borrowers for all income levels received loans totaling \$1.7 million.

INVESTMENT TEST

The bank's performance under the Investment Test in Ohio is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cleveland CSA AA is good.

The institution has a good level of qualified CD investments and grants, although rarely in a leadership position, or those that are not routinely provided by private investors, considering the bank’s significant investment in retail lending.

The institution exhibits good responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives. The bank made a significant number and dollar volume of grants and donations. The bank originated a significant number and dollar volume of loans with excellent distributions in the AA, considered favorably in assessing the level of investments.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cleveland CSA AA	1	703	413	7,376	414	100.0	8,079	100.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made a total of 413 separate CD investments during the current period in the Cleveland AA. CD grants were focused on small organizations and individuals to address specific needs of the community. CD grants and investments supported affordable housing for LMI individuals, community development corporations and other organizations that revitalize/stabilized LMI geographies, educational organizations, and community services for LMI individuals and neighborhoods.

Bank investments and grants also supported home ownership for LMI individuals. A total investment of \$5.8 million in mortgage backed securities provided loans to 36 LMI borrowers. The bank’s “3-2-1” program supports home ownership for LMI individuals. Through the program, the bank matches borrower savings up to \$3,000 to build funds available for loan closing. The “3-2-1” program assisted 200 LMI borrowers to purchase homes through contributions totaling of \$573 thousand during the evaluation period.

A LIHTC investment made in the prior period supported affordable housing. A book value of \$703 thousand remained on the bank’s books as of the evaluation period end date.

Examples of CD investments in the AA include:

- A total of \$40 thousand to a community development organization that assists with summer employment and professional skills development of LMI youth.
- \$32 thousand to a community development organization which owns or maintains 330 units of affordable housing and is revitalizing and stabilizing a moderate-income geography.
- \$30 thousand to a non-profit organization that operates a network of free public charter schools providing K-8 education to individuals from LMI households.
- \$25 thousand donation to a Community Development Financial Institution (CDFI) focused on providing financing for affordable real estate development with the aim of revitalizing communities within the Cleveland CSA AA.

SERVICE TEST

The bank’s performance under the Service Test in Ohio is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Cleveland CSA AA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cleveland CSA AA	100.0	29	100.0	6.9	20.7	44.8	27.6	12.9	20.9	34.1	31.7

Dollar’s branches and alternative delivery systems were effective and responsive in helping the bank provide services across the AA. The bank had a limited presence in low-income geographies with two branches. The proportion of branches in moderate-income geographies approximated the percentage of the population in those geographies.

Dollar Bank operates several alternative delivery systems, including debit cards and ATMs, online banking, and personal teller machines (PTM). The bank has four PTMs located in the Cleveland CSA AA, which provide a face to face experience for the customer and allow the user to have real-time conversations about deposit, loan and services offered by the bank. The bank also offers electronic bill pay and mobile banking options. The bank is a member of a nationwide ATM network with over 55,000 ATMs available to customers. The bank also offers convenient access to funds transfers between customers of numerous major financial institutions for no cost. These systems provided additional delivery availability and access to banking services to both retail and business customers.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cleveland CSA AA	1	1	0	0	+1	-1

The institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The opening and closing of branches, as reflected in the table above, had no impact on the delivery of services across the AA. The

bank demonstrated that standard procedures were followed in the one branch closure. These procedures considered branch traffic and profitability, as well as proximity and accessibility of other branches.

Services, including where appropriate business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. Dollar maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Most branches were open an additional two hours on Fridays and most offices were also open on Saturdays. The PTMs offered face to face interactions from 8am to 8pm, Monday through Saturday.

Community Development Services

The bank provided a relatively high level of CD services.

CD services were effective and responsive in helping the bank address community needs. Seventeen employees were actively involved in qualifying CD services during the evaluation period. These employees provided nearly 900 hours of financial education, technical assistance, or service on boards of directors and committees of over 20 qualified community organizations. Some activities of note:

- Separate from the workshops mentioned below, two Mortgages for Mothers and one Mortgages for Men workshops were held during the evaluation period. Nearly 400 women and just over 100 men attended these workshops. Please refer to page two for a program description.
- Bank employees conducted nearly 40 financial management workshops attended by over 800 LMI individuals.
- Thirteen financial literacy workshops were held in schools, where over 1,000 of the participating students were either eligible for free and reduced lunch or resided in LMI geographies.
- Six free homebuyer workshops were held for over 50 LMI individuals, many times in conjunction with qualifying organizations.

State Rating

State of Pennsylvania

CRA rating for the State of Pennsylvania:	Outstanding
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and the following performance context considerations discussed below, the geographic and borrower distributions of the bank’s home mortgage and small business loan originations and purchases are good.
- A relatively high level of CD Loans.
- Extensive use of innovative and/or flexible lending practices.
- A significant level of qualified investments and grants that are highly responsive to identified needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- A very high level of CD services that significantly impacted overall services performance.

Description of Institution’s Operations in Pennsylvania

Dollar Bank’s single AA within the state consisted of Allegheny, Butler, Washington and Westmoreland counties, which are in the Pittsburgh MSA. Dollar operated 39 branches including the two branches acquired in the merger with Progressive Home Federal Savings and Loan. The bank operated 83 ATM machines in the AA.

Dollar Bank had approximately \$4.8 billion deposits in the AA, which represents 69.1 percent of the bank’s total deposits. The bank ranked seventh out of 42 depository institutions with 3.3 percent market share. PNC Bank, with a much larger branch network, dominates the AA with 42.6 percent market share. Mellon Financial Corporation, through its two subsidiary banks, had a 25.8 percent market share.

The following tables provide a summary of the demographics that includes housing and business information for the Pittsburgh AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsburgh MSA – 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	605	7.3	21.5	45.6	23.3	2.3
Population by Geography	1,980,199	4.5	16.4	48.3	30.3	0.5
Housing Units by Geography	927,137	5.2	19.1	48.9	26.7	0.0
Owner-Occupied Units by Geography	586,826	2.3	14.5	51.1	32.1	0.0
Occupied Rental Units by Geography	244,032	9.4	25.8	46.1	18.6	0.1
Vacant Units by Geography	96,279	12.3	29.9	42.6	15.1	0.1
Businesses by Geography	141,623	4.5	12.5	47.4	34.9	0.7
Farms by Geography	3,187	1.5	9.2	59.0	30.3	0.1
Family Distribution by Income Level	514,507	19.2	17.4	21.6	41.8	0.0
Household Distribution by Income Level	830,858	24.3	15.5	16.9	43.2	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$62,376	Median Housing Value			\$128,797
			Median Gross Rent			\$670
			Families Below Poverty Level			7.7%
<i>Source: 2010 Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsburgh MSA – 2017 to 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	605	9.4	20.8	43.5	23.8	2.5
Population by Geography	1,986,311	5.5	16.6	47.2	30.1	0.6
Housing Units by Geography	931,103	6.4	18.6	47.5	27.3	0.2
Owner-Occupied Units by Geography	579,833	2.9	14.0	50.3	32.7	0.0
Occupied Rental Units by Geography	259,089	11.7	25.7	43.1	19.1	0.4
Vacant Units by Geography	92,181	13.6	27.8	42.2	16.1	0.3
Businesses by Geography	158,547	5.1	12.8	41.4	39.9	0.9
Farms by Geography	3,583	2.2	10.4	55.9	31.3	0.1
Family Distribution by Income Level	512,299	20.2	16.9	20.3	42.6	0.0
Household Distribution by Income Level	838,922	24.5	15.2	16.9	43.4	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$69,624	Median Housing Value			\$142,966
			Median Gross Rent			\$773
			Families Below Poverty Level			8.1%
<i>Source: 2015 ACS Census and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

When looking at housing affordability, the Pittsburgh MSA has a relatively low cost of living that makes homeownership affordable for most LMI persons. However, real estate taxes, which are not captured in the table below, are relatively high in much of the Pittsburgh MSA which reduces housing affordability for LMI persons. As a result, renting is a more cost-effective option for many LMI households. The table below illustrates housing affordability calculations for the MSA. The monthly mortgage payment calculations assume a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner’s insurance, real estate taxes, or any additional monthly expenses. The maximum low-income and maximum moderate-income annual income calculations are based on 50 percent and 80 percent of the 2019 FFIEC adjusted median family income for the MSA, respectively. As the table illustrates, low-income borrowers would be challenged to afford a home at the median home sales price. Furthermore, there is a very limited number of owner-occupied-units available in LMI geographies. The population of low-income census tracts is 109,247; however, there are just 16,815 owner-occupied units. The population of moderate-income census tracts is 329,728; however, there are 81,177 owner-occupied units.

MSA Name	2019 Updated MFI	Maximum Low-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	Maximum Moderate-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	2019 Median Home List Price*	Mortgage Payment Based on List Price
Pittsburgh MSA	79,300	39,650	184,652	991	63,440	295,443	1,586	189,750	1,019

*Source – Realtor.com 2019 MSA median housing list price.

Economic Data

According to the September 2019 Moody’s analytics report, Pittsburgh’s economy is struggling. Net hiring has declined to nearly zero after two years of one percent growth. While there have been gains in professional and business services and the public sector, these gains are offset by employment losses in healthcare and education, leisure and hospitality, and construction. Growth in hourly earnings has ceased due to a weaker job mix and reductions in middle-wage industries. Major employers are UPMC, Highmark, Inc., University of Pittsburgh, The PNC Financial Services Group, Inc., and Wal-Mart Stores Inc.

Technology has become a significant portion of the region’s economy. Low costs and a large pool of college graduates in science, technology, engineering, and math have allowed Pittsburgh to reinvent itself as a minor technology hub. Investments from large technology companies, including Apple, Microsoft, Uber, and Google will result in increased income levels among these workers. Recent rate cuts may result in difficulties for financial institutions that are headquartered or maintain large operations in Pittsburgh, including PNC Financial and the Bank of New York Mellon.

Construction in the region will see a boost from an ethane cracker plant being built in nearby Beaver county. The construction site will employ five thousand workers. More will be needed as the plant requires an additional power plan and pipelines to serve the cracker plant. While the plant is only expected to employ approximately 600, industry agglomeration may result in additional jobs and businesses being created nearby.

Retail job losses remain a concern in Pittsburgh, just as they are nationwide. Since 2016, retailers have reduced payrolls by approximately 7,000, despite low unemployment and growing wages as more

shopping occurs online. These job losses are steeper than the national trend, due in part to continued population losses and an aging population. Increases in logistics and shipping to support online shopping will offset some of those retail losses. Multinational delivery services maintain a significant corporate workforce in the region and the nation's top e-commerce company has begun building a distribution facility that will employ 800.

According to the BLS, the unemployment rate declined throughout the evaluation period. The rate was 5.1 percent in 2016 and 4.6 percent at the end of 2019. The unemployment rate in the MSA is slightly higher compared to the nationwide rate of 3.5 percent at year end.

Healthcare, education, and technology jobs will continue to buoy the economy in Pittsburgh, but population losses and the aging population will result in anticipated growth being lower than nationwide.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the Pittsburgh AA to determine local economic conditions and community needs. These contacts included representatives from community and economic development organizations. Needs identified include: home improvement lending, financial literacy, and homeownership and foreclosure counseling.

Scope of Evaluation in Pennsylvania

The OCC conducted a full-scope review of the Pittsburgh AA. The AA represents 67.4 percent of the bank's total home mortgage lending, 52.7 percent of the total number of branches, and 69.1 percent of total deposits. Refer to the table in appendix A for a list of AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

The bank's performance under the Lending Test in Pennsylvania is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh AA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Pittsburgh MSA AA	12,980	1,253	28	14,261
Dollar Volume of Loans (000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Pittsburgh MSA AA	1,701,209	149,518	34,366	1,385,093

Dollar Bank’s lending activity is excellent considering the bank’s market share and competition. According to the June 30, 2019 FDIC deposit market share data, Dollar ranked seventh out of 42 banks with a 3.3 percent deposit market share. This rank placed the bank in the top 16.7 percent of depository institutions. Based on 2018 peer mortgage data, the bank ranked third with a 6.8 percent market share. There is strong competition as reflected by the 551 lenders operating in the market. The two lenders ahead of Dollar Bank were PNC Bank with 10.4 percent and Wells Fargo with 7 percent.

According to 2018 peer small business data, Dollar Bank ranked 19th and with a 1.1 percent market share. There is significant competition as reflected by the 129 small business lenders in the AA and many of the bank’s competitors being nationwide credit card lenders. The top three lenders were PNC Bank with 21.4 percent, American Express with-17.1 percent and Chase Bank with 10.2 percent. When considering those institutions that were primarily commercial lenders, Dollar’s rank moved to 3rd out of approximately 65 lenders, which placed them in the top 5.0 percent of these lenders.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases.

The distribution of the bank’s home mortgage loans in LMI geographies is generally good. In both analysis periods and both low- and moderate-income geographies, the proportion of loans was generally below the proportion of owner-occupied housing units in those geographies. The analysis considered the limited availability of owner-occupied housing for individuals residing in LMI geographies, as noted in the Description of Institution’s Operations in Pennsylvania section. The shortage of owner-occupied housing is particularly acute for low-income residents. Just 2.9% of housing is owner-occupied, totaling 16,815 units for 109,247 residents. The shortage of owner-occupied housing is present for moderate-income residents. Owner-occupied units number 81,177 for 329,728 residents. The low number of owner-occupied units constrains the number of units on the market for sale to prospective buyers and limits opportunities to offer home mortgage loans. During the evaluation period, the bank had pre-approved loans while borrowers waited for housing units to become available.

Compared to the aggregate distribution of loans, Dollar's lending performance substantially met the aggregate distribution, and approximated the ratio of aggregate loans to demographics in both analysis periods and in low-income geographies, Dollar's performance exceeded the aggregate performance in the moderate-income geographies. Significantly, based on 2018 peer mortgage data, Dollar ranked 2nd out of 142 lenders in low-income geographies and 287 lenders in moderate-income geographies who originated or purchased at least one loan in these geographies. The bank was second to a much larger regional bank with substantially larger deposit market share and branch network. The bank performed better than other regional banks with greater deposit market share as well as national bank and non-bank mortgage lenders.

Small Loans to Businesses

Refer to Table Q in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The distribution of the bank's small loans to businesses in LMI geographies is generally good. In both analysis periods the proportion of loans in low-income geographies was near to or exceeded the proportion of businesses in those geographies and exceeded the aggregate distribution of loans. However, in both analysis periods, the proportion of loans in moderate-income geographies was below the proportion of businesses located in those geographies and the aggregate distribution of loans.

Lending Gap Analysis

OCC examiners reviewed summary reports and AA maps detailing the bank's lending activity over the evaluation period for home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of the bank's home mortgage loans to LMI borrowers is generally good. In both analysis periods, the proportion of loans to low-income borrowers was below the proportion of low-income families but comparable to the aggregate distribution of loans. Although the proportion of loans to low-income borrowers was lower than the proportion of low-income families, the bank and industry performance was impacted by the ratio of median homes sales prices to income in the AA. As discussed in the Description of Institution's Operations in Pennsylvania section, low-income borrowers would have been challenged to afford a mortgage at the median home sales price. Furthermore, housing affordability is impacted by relatively high real estate taxes in much of the AA. Real estate taxes impact affordability for moderate-income as well as low-income borrowers. Also, for very low-income families, income levels and limited savings typically preclude homeownership, given the high transaction costs associated with home purchase. For moderate-income borrowers, the bank's performance improved

from the 2016 to 2017 through 2019 analysis periods. This was evident in both the proportion of loans to moderate-income families and aggregate distribution of loans. Significantly, based on 2018 peer mortgage data, Dollar ranked 4th out of 234 lenders making at least one loan to low-income borrowers, and 2nd out of 300 lenders making at least one loan to moderate-income borrowers. The bank was a close second to a much larger regional bank with substantially larger deposit market share. The bank performed better than other regional banks with greater deposit market share as well as national bank and non-bank mortgage lenders.

Small Loans to Businesses

Refer to Table R in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of the bank's small loans to businesses by revenue is good. In both analysis periods, although the proportion of bank loans to small businesses was generally below the proportion of small businesses, bank performance was stronger or significantly stronger than the aggregate distribution of loans.

Community Development Lending

The institution has originated a good level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CD loans offered were effective and responsive in helping the bank address community credit needs. Dollar Bank's loans supported wide breadth of community development activities in affordable housing for LMI individuals, economic development, education, and community services for LMI individuals and neighborhoods. CD loans support larger established organizations as well as targeted loans to small community organizations that address specific community needs. Loans assist organizations which provide affordable housing through rental and ownership opportunities and organizations which offer credit repair workshops. Economic development is promoted through innovative small business lending and loans to organizations that provide job training. Loans also aid organizations which provide educational and health services to LMI individuals. Examples include:

- Two loans totaling \$3.1 million loan to support a nonprofit organization that serves LMI individuals by providing job training and employment programs, early childhood education, and after school youth programs.
- \$3.0 million loan to support a non-profit health care organization which provides health, wellness, and educational programs to LMI women and their families.
- \$1.8 million loan to support a community renovation project which will provide affordable housing for LMI families.
- \$1.5 million loan to support a non-profit organization that provides facilities and facility renovations for an educational institution serving children in LMI communities.

- \$1.0 million loan to support a non-profit organization that provides elementary and secondary education, mental health services, and family counseling for LMI individuals and families.
- Four loans totaling \$1.0 million to a non-profit organization which initiates, plans, finances, develops, and manages affordable housing in LMI census tracts.
- \$300 thousand loan commitment to a small business incubator that supports LMI entrepreneurs. During the evaluation period, \$115 thousand in loan commitments were provided to four small, disadvantaged businesses in the Pittsburgh MSA AA. Refer to the Overall CRA Rating section for additional information about this program.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. Dollar Bank offers several lending programs to assist LMI borrowers obtain home loans and to address small business lending needs. A small business lending program for LMI entrepreneurs was discussed in the CD Lending section above. The home loan programs assist borrowers with closing costs and offer loan terms that are more affordable to borrowers, including LMI borrowers and first-time homebuyers. The bank partners with public/non-profit housing organizations to create affordable loan programs. The home loan programs have provided loans to 406 LMI borrowers or borrowers in LMI geographies for a total of \$32.0 million. Following are examples of the home loan programs. Also refer to the Overall CRA Rating section for information on these programs.

- A home improvement loan program provides affordable loan terms to city of Pittsburgh LMI borrowers. The program is offered in partnership with a government-sponsored non-profit organization and has a repayment period of up to 240 months and zero percent interest rate. A total of 51 LMI borrowers received loans totaling \$1.3 million.
- Rent-No-More Community Mortgage allows income eligible borrowers to include closing costs in their mortgage financing, up to 100 percent of the value of the home, without a private mortgage insurance requirement. A total of 326 LMI borrowers received loans totaling \$30.0 million.
- The Home Works Home Loan offers loans up to \$50,000 with extended repayment terms to 180 months to help lower monthly payments. A total of 29 LMI borrowers or borrowers in LMI geographies received loans totaling \$681 thousand. A total of 187 borrowers for all income levels received loans totaling \$6.7 million.

INVESTMENT TEST

The bank's performance under the Investment Test in Pennsylvania is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh AA is excellent.

The institution has a reasonable level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The number and dollar volume of investments are material relative to opportunities in the AA and are consistent with the bank’s capacity and expertise. The concentration of investments and grants in the AA is noteworthy given the competition from larger financial institutions for available opportunities.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Pittsburgh MSA AA	12	4,531	397	14,371	409	100.0	18,902	100.0	3	263

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made a total of 397 separate CD investments during the current period in a four-county area within a single MSA. The CD grants and investments were often granular in nature, targeted to small organizations and individuals to focus on specific needs of the community. CD investments and grants supported affordable housing for LMI individuals, economic development, education, and community services for LMI individuals and neighborhoods. CD investments benefitted Community Development Corporations seeking to revitalize LMI geographies, real estate development for small business use in distressed or LMI geographies, and several educational improvement organizations. Following are specific examples.

During the evaluation period, Dollar made \$7.2 million in Low Income Housing Tax Credits (LIHTC) and \$1.3 million in qualifying Historic Tax Credits (HTC). Additionally, 11 LIHTCs and one qualifying HTC made in prior periods with a total book value of \$4.5 million remained on the bank’s books as of the evaluation period end date. Three of the HTCs have \$263 thousand in unfunded commitments at December 31, 2019. These investments exhibit Dollar’s continued effort to address affordable housing needs in the AA.

Also, during the evaluation period, the bank made \$3.3 million in Neighborhood Partnership Program (NPP) and Special Program Priorities (SPP) grants. These grants are part of the Pennsylvania Department of Community and Economic Development’s Neighborhood Assistance Program. The NPP is a tax credit program that provides an 80 percent state tax credit to companies that make contributions to qualifying community development organizations (CDOs) through a six-year commitment. The SPP offers a 75 percent state tax credit for a one-year commitment. Qualifying CDOs engage in activities around affordable housing, real estate development, social services, crime prevention, education, workforce development and other community revitalization efforts.

Dollar supported scholarship opportunities for underserved youth in the city of Pittsburgh through the State of Pennsylvania’s Education Improvement Tax Credit Program and the Opportunity Scholarship Tax Credit Program. The bank made a total of \$1.4 million in multi-year donations to 20 organizations that supported these programs. These donations ranged in amounts from \$5 thousand to \$60 thousand per year.

The bank supported home ownership for LMI individuals through its “3-2-1” program. Under the program, the bank matches borrower savings up to \$3,000 to build funds available for loan closing. Grants to borrowers through the “3-2-1” contribution program totaled \$215 thousand during the evaluation period and helped 69 LMI borrowers to purchase homes.

An example of a high impact donation is \$100 thousand to a qualifying organization that helps to revitalize distressed and transitional neighborhoods. This donation was used to help provide affordable housing units in the Pittsburgh Hill District. The bank also provided \$50 thousand to this organization for operating support.

SERVICE TEST

The bank’s performance under the Service Test in Pennsylvania is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Pittsburgh AA is excellent. Excellent CD service performance augmented overall good retail services performance.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Pittsburgh MSA AA	100.0	39	100.0	12.8	0.0	35.9	48.7	5.5	16.6	47.2	30.1

*One branch (2.6%) is in a NA designated geography.

The bank’s branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had five branches in low-income geographies, substantially exceeding the population in those geographies. Although the bank did not have any branches in moderate-income geographies, this was a result of census tract income changes from the 2015 ACS updates that went into effect on January 1, 2017. Prior to this change, the bank had three branches in moderate-income geographies. Several branches in middle- and upper-income geographies are in close proximity to LMI geographies and are readily accessible by walking or public transportation.

Dollar Bank operates several alternative delivery systems, including debit cards and ATMs, online banking, and personal teller machines (PTM). The bank has seven PTMs located in the Pittsburgh MSA AA, which provide a face to face experience for the customer and allow the user to have real-time conversations about deposit, loan and services offered by the bank. The bank also offers electronic bill pay and mobile banking options. The bank is a member of a nationwide ATM network with over 55,000

ATMs available to customers. The bank also offers convenient access to funds transfers between customers of numerous major financial institutions for no cost. These systems provided additional delivery availability and access to banking services to both retail and business customers.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Pittsburgh MSA AA	2	2	-2	+1	0	+1

The institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, two branches in low-income geographies were closed. One branch closed when the lease expired and was not renewed by the landlord. The second branch was located inside a grocery store that was closed. The bank opened two branches, one located in a moderate-income geography and one in an upper-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. Dollar maintains standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open an hour later Fridays and all branches are open Saturdays. The PTMs offer face to face interactions from 8am to 8pm, Monday through Saturday.

Community Development Services

The institution is a leader in providing CD services. This performance significantly impacted the overall service test conclusion for the Pittsburgh AA.

CD services were highly effective and responsive in helping the bank address community needs. Approximately fifty employees (nearly 20 percent of the total employees in the AA) were actively involved in qualifying CD services during the evaluation period. These employees provided over 2,500 hours of financial education, technical assistance, or service on boards of directors and committees of over 100 qualified community organizations. Some activities of note:

- Separate from the workshops mentioned below, four Mortgages for Mothers and four Mortgages for Men workshops were held during the evaluation period. Nearly 3,000 women and just over 550 men attended these workshops. Please refer to page two for a program description.
- Bank employees conducted nearly 400 financial management workshops attended by over 4,000 LMI individuals.
- Twenty-five financial literacy workshops were held in schools, where over 800 of the participating students were either eligible for free and reduced lunch or resided in LMI geographies.
- Nearly 40 free homebuyer workshops were held for over 425 LMI individuals, many times in conjunction with qualifying organizations.

- Bank employees conducted nearly 20 small business workshops attended by over 200 small business owners. The workshops are free, and assist existing, new, and potential new business owners with low cost leasing information, technical training, and business plan preparation.
- Credit enhancement and restoration workshops were conducted at two non-profit organizations which provide services to homeless veterans.
- Financial literacy workshops at a major public housing authority and a non-profit organization which provides services to workforce trainees.

State Rating

State of Virginia

CRA rating for the State of Virginia:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and the following performance context considerations discussed below, the geographic and borrower distribution of the bank’s home mortgage and small business loan originations and purchases is adequate and good, respectively.
- Good use of innovative and/or flexible lending practices.
- Qualified investments were effective and responsive in helping the bank address community needs. The bank made a significant number of investments, grants and donations under its programs.
- Qualified investments were effective and responsive in helping the bank address community needs. The bank made a significant number of investments, grants and donations under its programs.
- The bank’s branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a good number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution’s Operations in Virginia

Dollar Bank’s delineated AA consisted of a portion of the Virginia Beach/Norfolk VA MSA that included the independent cities of Chesapeake, Norfolk, and Virginia Beach. Four branches were acquired through the bank’s merger with Bank @lantec in March 2017. The bank expanded its presence by opening two branches in Virginia Beach. Dollar operates 15 ATMs.

Dollar had \$169.5 million of deposits within this AA, representing 2.5 percent of the bank’s deposits. In the Virginia Beach/Norfolk VA MSA AA, Dollar ranks 11th among 17 institutions with a 1.1 percent market share. The top three banks, each with much larger branch networks, were Towne Bank with 23.4 percent, Wells Fargo Bank with 23.3 percent and SunTrust Bank with 16.4 percent.

The following tables provide a summary of the demographics that includes housing and business information for the Virginia Beach/Norfolk MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Virginia Beach MSA AA – 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	221	6.3	22.6	35.7	33.5	1.8
Population by Geography	903,006	4.7	21.0	34.5	39.7	0.0
Housing Units by Geography	353,326	4.3	22.5	35.7	37.5	0.0
Owner-Occupied Units by Geography	207,762	1.8	15.4	35.9	47.0	0.0
Occupied Rental Units by Geography	120,021	8.3	33.1	37.3	21.3	0.0
Vacant Units by Geography	25,543	6.3	30.8	26.1	36.8	0.0
Businesses by Geography	59,607	2.4	17.2	38.2	41.5	0.5
Farms by Geography	1,256	1.7	13.0	33.0	52.1	0.3
Family Distribution by Income Level	222,412	18.2	18.1	22.1	41.7	0.0
Household Distribution by Income Level	327,783	20.3	17.5	19.7	42.5	0.0
Median Family Income MSA - 47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA		\$67,485	Median Housing Value			\$278,392
			Median Gross Rent			\$1,020
			Families Below Poverty Level			6.9%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Virginia Beach MSA AA – 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	222	5.9	26.6	34.7	30.2	2.7
Population by Geography	924,343	4.3	26.9	34.4	34.1	0.3
Housing Units by Geography	363,602	4.2	26.5	35.0	33.9	0.4
Owner-Occupied Units by Geography	200,828	1.8	17.4	36.7	43.9	0.2
Occupied Rental Units by Geography	133,977	7.6	39.7	33.0	19.1	0.6
Vacant Units by Geography	28,797	4.9	29.0	31.9	33.0	1.3
Businesses by Geography	77,307	2.3	21.4	36.3	38.7	1.3
Farms by Geography	1,693	1.5	16.2	34.4	47.5	0.4
Family Distribution by Income Level	225,941	20.4	17.4	20.5	41.7	0.0
Household Distribution by Income Level	334,805	21.4	16.6	19.1	42.9	0.0
Median Family Income MSA - 47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA		\$69,773	Median Housing Value			\$254,325
			Median Gross Rent			\$1,161
			Families Below Poverty Level			9.2%

Source: 2015 ACS Census and 2019 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

When looking at housing affordability, the Virginia Beach MSA AA has a moderate cost of living that makes homeownership for low-income persons difficult to obtain. The table below illustrates housing affordability calculations for the MSA. The monthly mortgage payment calculations assume a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner’s insurance, real estate taxes, or any additional monthly expenses. The maximum low-income and maximum moderate-income annual income calculations are based on 50 percent and 80 percent of the 2019 FFIEC adjusted median family income for the MSA, respectively. As the table illustrates, both low- and moderate-income borrowers would be challenged to afford a mortgage at the median home sales price. However, there appears to be sufficient housing stock priced below the median and affordable to moderate-income borrowers to support robust lending activity in that segment.

MSA Name	2019 Updated MFI	Maximum Low-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	Maximum Moderate-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	2019 Median Home List Price*	Mortgage Payment Based on List Price
Virginia Beach MSA	75,800	37,900	176,502	948	60,640	282,403	1,516	304,050	1,632

*Source – Realtor.com 2019 MSA median housing list price.

Economic Data

Based on data from the December 2019 Moody’s Analytics report, the Virginia Beach/Norfolk VA MSA AA was waking up in the later portion of the evaluation period after a brief slumber in late 2018 into early 2019. Job growth was lagging the U.S. and State averages. The unemployment rate dropped 34 percent over the review period. The Millennial and Generation X age groups made up the largest portion of the AA population. These highly educated employee pools are not likely to fill the blue-collar jobs that are abundant in this AA. The AA had economic drivers of tourism, logistics and U.S. defense. House prices increased slightly over the review period, however, the AA increases were not as steep as the U.S. or state of Virginia rates. However, median housing values declined substantially over the preceding period, reflecting some of the underlying weaknesses in the economy.

Key sectors of the AA economy include Government, Professional and Business Services, Education and Health Services, Leisure and Hospitality Services, and Retail Trade. Major employers include Huntington Ingalls Industries Inc, Sentara Healthcare, Walmart Inc, Riverside Regional Medical Center, and Food Lion/Farm Fresh.

According to the BLS, the AA unemployment rate decreased 34 percent over the evaluation period. The AA average rate in 2016 was 4.7 percent, and 3.1 percent in 2019. The AA unemployment rate was slightly higher than the state of Virginia rate and slightly below the U.S. rate for the same time-periods.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the Virginia Beach/Norfolk MSA AA to determine local economic conditions and community needs. These contacts indicated the need for affordable housing, first-time home buyer programs, gap financing for LMI multi-family rental housing, and multi-family rehabilitation project financing.

Scope of Evaluation in Virginia

The OCC conducted a full-scope review of the Virginia Beach/Norfolk VA MSA AA. The bank entered the state through the acquisition of Bank @lantec in March 2017. The evaluation considered CRA activities for 2017 through 2019. The AA represents 2.4 percent of the bank’s total lending, 8.1 percent of total branches, and 2.5 percent of total deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

LENDING TEST

The bank’s performance under the Lending Test in Virginia High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Virginia Beach MSA AA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs, given market competition and relatively new entrance into the market.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Virginia Beach/Norfolk MSA	298	32	1	331
Dollar Volume of Loans (000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Virginia Beach/Norfolk MSA	76,360	2,352	1,000	79,712

According to the June 30, 2019 FDIC deposit market share data, Dollar ranked 11th out of 17 depository institutions in the AA, with a 1.1 percent market share. This rank placed the bank in the top 64.7 percent of all depository institutions in the AA. Based on 2018 peer mortgage data, Dollar ranks 54th with 0.3 percent market share. This rank placed the bank in the top 13.0 percent of all mortgage lenders. Competition for mortgage loans was very strong, as there were 413 other lenders in the AA. The top three lenders and their market shares were Wells Fargo with 9.5 percent, Navy Federal Credit Union with 8.2 percent, and Atlantic Bay Mortgage Company with 7.1 percent.

According to 2018 peer small business data, Dollar ranked 36th with a market share of 0.1 percent. This rank placed the bank in the top 36.7 percent of all small business lenders. Competition was strong as there were 98 other small business lenders. The top three lenders and their market shares were American Express with 20.2 percent, BB&T Bank with 9.8 percent, and Citibank with 8.1 percent. Overall, the top five lenders are nationwide lenders with large business credit card portfolios that together captured over 54.0 percent of the small business market. When considering those institutions that were primarily commercial lenders, Dollar’s rank moved to 8th out of approximately 40 lenders, which placed them in the top 21.0 percent of these lenders.

Distribution of Loans by Income Level of the Geography

The bank exhibits adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The distribution of the bank's home mortgage loans in low- and moderate-income geographies is generally adequate. The proportion of loans was generally comparable to the proportion of owner-occupied housing units in those geographies, and somewhat below the aggregate distribution of loans in those geographies.

Small Loans to Businesses

Refer to Table Q in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The distribution of the bank's small loans to businesses in low- and moderate-income geographies is generally poor. The bank did not originate any loans in low-income geographies and originated only nine in moderate-income geographies, in a pattern consistent with the location of its branches. This is out of a total 32 small loans to businesses originated during the evaluation period.

Lending Gap Analysis

OCC examiners reviewed summary reports and AA maps detailing the bank's lending activity over the evaluation period for home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of the bank's home mortgage loans to low- and moderate-income borrowers is generally good. In arriving at our conclusion, we considered the high cost of housing compared to income as discussed in the demographic data section of this Performance Evaluation. Further, for very low-income families, income levels and limited savings typically preclude homeownership, given the high transaction costs associated with home purchase. The proportion of loans to low-income borrowers was generally weaker than the proportion of low-income families and equaled the aggregate distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers was stronger than the proportion of low-income families and equaled the aggregate distribution of loans to those borrowers. In

our analysis we also considered that the bank's loan performance equaled and was stronger than the aggregate lender performance to low- and moderate-income borrowers, respectively.

Small Loans to Businesses

Refer to Table R in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of the bank's small loans to businesses by revenue is excellent. The proportion of loans approximated the proportion of small businesses and was stronger than the aggregate distribution of loans to those businesses. This performance was based on 27 of the 32 small loans to businesses the bank originated being made to small businesses (businesses with gross annual revenues of \$1 million or less).

Community Development Lending

The institution has made few if any CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated a \$1 million line of credit to a CDFI that has helped create or retain over 5,500 jobs and create over 5,000 affordable housing units for LMI persons. The bank provided a \$100 thousand loan commitment to a small business incubator that supports LMI entrepreneurs. Refer to the Overall CRA Rating section for additional information about this program. This performance has a neutral impact on Dollar's lending test performance in the AA, as its geographic and borrower performance indicate the bank's existing products effectively address community credit needs.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs. These were bank-wide programs that address affordable housing for LMI individuals. The home loan programs assist borrowers with closing costs and offer loan terms that are more affordable to borrowers, including LMI borrowers and first-time homebuyers. Please refer to the Overall Rating section for information on these programs. Following is an example.

- Rent-No-More Community Mortgage allows income eligible borrowers to include closing costs in their mortgage financing, up to 100 percent of the value of the home, without a private mortgage insurance requirement. A total of 6 LMI borrowers received loans totaling \$967 thousand.

INVESTMENT TEST

The bank's performance under the Investment Test in Virginia is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Virginia Beach MSA AA is good.

The institution has a significant level of qualified CD investments and grants, although not in a leadership position, nor those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Virginia Beach MSA AA	0	0	13	3,660	13	100.0	3,660	100.0	0	\$0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The majority of the investment dollars were three MBS that provided 18 mortgages to LMI borrowers totaling \$3.6 million. Through one of its other CD investment programs the bank matched down payment funds for two new home purchases for LMI families. The balance of the remaining CD investments were eight donations to community service and affordable housing organizations in the AA totaling \$21 thousand.

SERVICE TEST

The bank’s performance under the Service Test in Virginia is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Virginia Beach/Norfolk MSA AA is good.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Virginia Beach MSA AA	100.0	6	100.0	0.0	16.7	50.0	33.3	5.9	26.6	34.7	30.2

The bank’s branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. As shown in the table above, the bank did not have any branches

in low-income geographies, and one branch in a moderate-income geography. Due to the bank’s limited presence in the AA, this performance is considered adequate.

Dollar Bank has several alternative delivery systems, including debit cards and ATMs, online banking, and personal teller machines (PTM). The bank has four PTMs located in the Virginia Beach MSA AA, which provide a face to face experience for the customer and allow the user to have real-time conversations about deposit, loan and services offered by the bank. The bank also offers electronic bill pay and mobile banking options. The bank is a member of a nationwide ATM network with over 55,000 ATMs available to customers. The bank also offers convenient access to funds transfers between customers of numerous major financial institutions for no cost. These systems provided additional delivery availability and access to banking services to both retail and business customers.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Virginia Beach MSA AA	2	0	0	0	+2	0

The institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. As shown in the table above, the bank opened two branches in middle-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. Dollar maintains standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open an hour later Fridays and all branches are open Saturdays. The PTMs offer face to face interactions from 8am to 8pm, Monday through Saturday.

Community Development Services

The institution provides an excellent level of CD services. Ten employees provided financial education, technical assistance, or served on boards/committees of qualifying organizations. These employees provided over 410 hours to 20 organizations. Additionally, two Mortgages for Mothers workshops were held during the evaluation period. Nearly 400 women attended these workshops. Please refer to page two for a program description.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2016 to 12/31/2019 (OH, PA); 01/01/2017 to 12/31/2019 (VA)	
Bank Products Reviewed:	Home mortgage, small business, CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Ohio		
Cleveland CSA	Full-scope	Summit county (Akron, OH MSA) Cuyahoga, Lake, Lorain, and Medina counties (Cleveland, OH MSA)
Pennsylvania		
Pittsburgh MSA	Full-scope	Allegheny, Butler, Washington, and Westmoreland counties
Virginia		
Virginia Beach/Norfolk MSA	Full-scope	Independent cities of Chesapeake, Norfolk, and Virginia Beach

Appendix B: Summary of MMSA and State Ratings

RATINGS Dollar Bank, FSB				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Dollar Bank	High Satisfactory	Outstanding	Outstanding	Outstanding
MMSA or State:				
Ohio	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Pennsylvania	High Satisfactory	Outstanding	Outstanding	Outstanding
Virginia	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cleveland CSA AA	1,542	187,480	100.0	70,197	6.0	3.2	2.1	15.8	12.0	10.9	41.0	36.8	40.7	37.3	48.0	46.3	0.0	0.0	0.0
Total	1,542	187,480	100.0	70,197	6.0	3.2	2.1	15.8	12.0	10.9	41.0	36.8	40.7	37.3	48.0	46.3	0.0	0.0	0.0

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cleveland CSA AA	4,432	516,051	100.0	79,633	7.0	4.8	3.4	17.5	13.8	13.6	38.0	37.3	39.7	37.3	44.0	43.3	0.1	0.1	0.0
Total	4,432	516,051	100.0	79,633	7.0	4.8	3.4	17.5	13.8	13.6	38.0	37.3	39.7	37.3	44.0	43.3	0.1	0.1	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland CSA AA	1,542	187,480	100.0	70,197	22.0	8.0	8.1	17.5	19.1	18.3	20.9	21.3	20.2	39.6	50.6	37.5	0.0	1.0	15.8
Total	1,542	187,480	100.0	70,197	22.0	8.0	8.1	17.5	19.1	18.3	20.9	21.3	20.2	39.6	50.6	37.5	0.0	1.0	15.8

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland CSA AA	4,432	516,051	100.0	79,633	23.0	10.8	9.7	16.8	20.3	19.8	19.7	22.7	21.3	40.5	43.8	35.8	0.0	2.4	13.4
Total	4,432	516,051	100.0	79,633	23.0	10.8	9.7	16.8	20.3	19.8	19.7	22.7	21.3	40.5	43.8	35.8	0.0	2.4	13.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cleveland CSA AA	172	19,660	100.0	44,799	8.3	10.5	6.7	14.4	11.0	12.7	36.6	43.6	35.4	40.3	34.9	45.1	0.3	0.0	0.1
Total	172	19,660	100.0	44,799	8.3	10.5	6.7	14.4	11.0	12.7	36.6	43.6	35.4	40.3	34.9	45.1	0.3	0.0	0.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cleveland CSA AA	546	66,697	143.3	46,776	9.4	10.1	8.3	16.6	21.4	15.7	32.7	28.4	31.6	40.5	39.4	43.8	0.7	0.7	0.6
Total	546	66,697	143.3	46,776	9.4	10.1	8.3	16.6	21.4	15.7	32.7	28.4	31.6	40.5	39.4	43.8	0.7	0.7	0.6

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cleveland CSA AA	172	19,660	100.0	44,799	81.3	48.3	44.5	7.6	30.2	11.1	21.5
Total	172	19,660	100.0	44,799	81.3	48.3	44.5	7.6	30.2	11.1	21.5

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cleveland CSA AA	546	66,697	100.0	46,776	83.0	65.4	46.8	6.7	29.7	10.3	4.9
Total	546	66,697	100.0	46,776	83.0	65.4	46.8	6.7	29.7	10.3	4.9

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Pittsburgh MSA AA	4,589	587,180	100.0	57,989	2.3	1.1	1.2	14.5	8.2	9.9	51.1	42.0	47.3	32.1	48.7	41.6	0.0	0.0	0.0
Total	4,589	587,180	100.0	57,989	2.3	1.1	1.2	14.5	8.2	9.9	51.1	42.0	47.3	32.1	48.7	41.6	0.0	0.0	0.0

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Pittsburgh MSA AA	12,980	1,701,209	100.0	61,871	2.9	1.5	1.6	14.0	9.7	11.3	50.3	43.3	47.1	32.7	45.4	39.9	0.0	0.0	0.0
Total	12,980	1,701,209	100.0	61,871	2.9	1.5	1.6	14.0	9.7	11.3	50.3	43.3	47.1	32.7	45.4	39.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Pittsburgh MSA AA	4,589	587,180	100.0	57,989	19.2	6.2	7.4	17.5	14.5	17.4	21.6	20.7	20.7	41.8	57.4	41.8	0.0	1.2	12.7
Total	4,589	587,180	100.0	57,989	19.2	6.2	7.4	17.5	14.5	17.4	21.6	20.7	20.7	41.8	57.4	41.8	0.0	1.2	12.7

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Pittsburgh MSA AA	12,980	1,701,209	100.0	61,871	20.2	7.4	9.0	16.9	17.0	19.2	20.3	22.1	21.5	42.6	51.2	40.1	0.0	2.3	10.3
Total	12,980	1,701,209	100.0	61,871	20.2	7.4	9.0	16.9	17.0	19.2	20.3	22.1	21.5	42.6	51.2	40.1	0.0	2.3	10.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Pittsburgh MSA AA	369	45,853	100.0	39,862	4.5	5.1	3.6	12.5	9.8	11.4	47.4	44.2	46.3	34.9	39.8	38.3	0.7	1.1	0.4
Total	369	45,853	100.0	39,862	4.5	5.1	3.6	12.5	9.8	11.4	47.4	44.2	46.3	34.9	39.8	38.3	0.7	1.1	0.4

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Pittsburgh MSA AA	1,253	149,518	100.0	38,357	5.1	4.9	4.4	12.8	10.4	13.3	41.4	40.1	42.0	39.9	43.9	39.8	0.9	0.7	0.5
Total	1,253	149,518	100.0	38,357	5.1	4.9	4.4	12.8	10.4	13.3	41.4	40.1	42.0	39.9	43.9	39.8	0.9	0.7	0.5

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pittsburgh MSA AA	369	45,853	100.0	39,862	81.7	49.6	46.6	6.6	35.8	11.7	14.6
Total	369	45,853	100.0	39,862	81.7	49.6	46.6	6.6	35.8	11.7	14.6

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pittsburgh MSA AA	1,253	149,518	100.0	38,357	82.8	66.9	46.3	6.0	30.6	11.2	2.6
Total	1,253	149,518	100.0	38,357	82.8	66.9	46.3	6.0	30.6	11.2	2.6

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Virginia Beach MSA AA	290	71,296	100.0	32,696	1.8	1.7	2.4	17.4	13.1	17.7	36.7	31.7	35.7	43.9	53.4	43.8	0.2	0.0	0.4
Total	290	71,296	100.0	32,696	1.8	1.7	2.4	17.4	13.1	17.7	36.7	31.7	35.7	43.9	53.4	43.8	0.2	0.0	0.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Virginia Beach MSA AA	290	71,296	162.9	32,696	20.4	4.8	5.0	17.4	18.3	17.9	20.5	22.1	21.9	41.7	52.1	33.3	0.0	2.8	22.0
Total	290	71,296	162.9	32,696	20.4	4.8	5.0	17.4	18.3	17.9	20.5	22.1	21.9	41.7	52.1	33.3	0.0	2.8	22.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Virginia Beach MSA AA	32	2,352	100.0	15,633	2.3	0.0	2.4	21.4	28.1	21.1	36.3	46.9	35.7	38.7	25.0	38.8	1.3	0.0	2.0
Total	32	2,352	100.0	15,633	2.3	0.0	2.4	21.4	28.1	21.1	36.3	46.9	35.7	38.7	25.0	38.8	1.3	0.0	2.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Virginia Beach MSA AA	32	2,352	100.0	15,633	86.6	84.4	49.6	4.3	26.3	9.1	0.0
Total	32	2,352	100.0	15,633	86.6	84.4	49.6	4.3	26.3	9.1	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0