Office of the
Comptroller of the Currency
Washington, DC 20219

LARGE BANK

PUBLIC DISCLOSURE

January 2, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Dollar Bank, Federal Savings Bank
Charter Number: 708043

20 Stanwix Street
Pittsburgh, PA 15222

Office of the Comptroller of the Currency
200 Public Square Suite 1610
Cleveland, OH 44144

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: Outstanding

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

	Dollar Bank Performance Tests		
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
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 Outstanding performance in Pennsylvania, Ohio, and Virginia.
- The Investment Test rating is primarily based on the Outstanding performance in Pennsylvania and Virginia, and High Satisfactory performance in Ohio.
- The Service Test rating is primarily based on the Outstanding performance in the state of Pennsylvania, and High Satisfactory performance in Ohio and Virginia.
- The bank originates a high percentage of loans inside its assessment areas (AAs).
- The bank makes extensive use of flexible lending practices to serve AA credit needs.

Lending in Assessment Area

A high percentage of the bank's loans are in its AAs.

The bank originated and purchased 84.5 percent of its total loans inside the bank's 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. This level of lending had a positive impact on the bank's geographic distribution of loans analysis.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans $(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	$	%	$	%	$(000s)
Home Mortgage										
2020	6,937	84.7	1,257	15.3	8,194	1,199,159	69.5	525,998	30.5	1,725,156
2021	7,237	84.3	1,345	15.7	8,582	1,205,581	68.3	558,400	31.7	1,763,981
2022	5,570	77.6	1,612	22.4	7,182	895,144	57.8	654,074	42.2	1,549,219
Subtotal	**19,744**	**82.4**	**4,214**	**17.6**	**23,958**	**3,299,884**	**65.5**	**1,738,472**	**34.5**	**5,038,356**
Small Business										
2020	2,396	94.6	136	5.4	2,532	246,821	91.8	22,097	8.2	268,918
2021	1,799	95.2	91	4.8	1,890	169,610	91.2	16,400	8.8	186,010
2022	586	91.7	53	8.3	639	77,813	89.6	9,074	10.4	86,887
Subtotal	**4,781**	**94.5**	**280**	**5.5**	**5,061**	**494,244**	**91.2**	**47,571**	**8.8**	**541,815**
Total	**24,525**	**84.5**	**4,494**	**15.5**	**29,019**	**3,794,128**	**68.0**	**1,786,043**	**32.0**	**5,580,171**
Source: Bank data; Due to rounding, totals may not equal 100.0%. Dollar amounts for Home Mortgage loans are multiplied by 1000.										

Description of Institution

Dollar Bank is an interstate, mutual thrift headquartered in Pittsburgh, Pennsylvania. Dollar is a mutual holding company of Dollar Mutual Bancorp (DMB). As of December 31, 2021, DMB is a $11.4 billion financial services holding company also located in Pittsburgh, Pennsylvania.

DMB has nine operating subsidiaries: CFS Service Corporation, Citizens Service Corporation, Colton Enterprise, Inc., Dollar Bank Insurance Agency, Dollar Bank Leasing Corp., Dollar Bank Settlement Services, Inc., Dollar Finance Inc., Fourth Avenue Finance LLC, and The New Market Corporation. These subsidiaries are not included within the scope of this public evaluation. On September 6, 2022, the bank completed a merger with Standard Bank, with Dollar as the surviving institution. Through the merger, the bank network expanded into two new AAs in Pennsylvania.

Dollar 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, electronic 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.

Dollar operates 79 branch offices distributed across three states, with 29 in Ohio, 37 in Pennsylvania, and 13 in Virginia. The bank opened seven branches in Virginia during the evaluation period. Dollar also has a total of 156 deposit taking automatic teller machines (ATMs) and Personal Teller Machines (PTMs) which are designed to allow the customer to choose between video teller interaction and standard ATM transactions.

As of December 31, 2022, total net loans and leases outstanding were $8.5 billion. The bank's loan portfolio consisted of 66.0 percent 1-4 family residential loans, 10.6 percent non-farm non-residential loans, 9.1 percent commercial & industrial loans, 8.5 percent construction loans, 3.0 percent consumer loans, 2.6 percent multifamily loans, and 0.3 percent in all other loans. The bank's tier 1 capital was $1.2 billion or 10.5 percent of total assets. Total deposits were $8.4 billion. There are no legal, financial, or other impediments to Dollar's ability to help meet the credit needs within its communities. Dollar received an Outstanding rating at its prior CRA evaluation by the OCC dated March 9, 2020.

Product Innovation and Flexibility

The bank makes extensive use of flexible lending practices to serve AA credit needs. Dollar participates in several state and federal programs targeted to low- and moderate-income borrowers in the bank's AAs. Some of the more significant programs include:

- Paycheck Protection Program (PPP) – In response to the COVID-19 pandemic, Dollar began processing PPP loans under the federally funded CARES Act Program. Between April 3, 2020, and May 3, 2021, the bank processed over 3,400 loans totaling $542 million. During the first round of the program, the bank originated 2,094 PPP loans, in which approximately 20.0 percent were to businesses in low- and moderate-income census tracts (CTs). During the second round of the program, the bank originated 1,344 PPP loans, in which approximately 22.0 percent were to businesses in low- and moderate-income CTs.

- 5-2-1 Match Program – This program offers $5,000.00 in matching funds to low- and moderate-income applicants who are in the process of purchasing a home to assist with closing costs, down payment, and taxes. This replaced the 3-2-1 Match Program, in which the bank matched $3,000.00 in funds. The increase in matched funds was due to the market difficulties caused by the COVID-19 pandemic impacting the affordability of homes. 252 people across Dollar's three markets utilized the Matched Savings Program to purchase their first home.

- First Time Homebuyer Program – Developed to assist low- and moderate-income individuals and families who cannot qualify for a mortgage because of inadequate income, excessive debt and/or poor credit. Dollar is the only financial institution in Western Pennsylvania, Northeast Ohio, and Hampton Roads, Virginia to provide comprehensive in-house credit counseling and restoration services. Workshops were cancelled in 2020 due to the COVID-19 pandemic; however, in 2021 the bank offered virtual workshops, attended by over 2,100 registrants. In 2022, the workshop returned to the original in-person format with over 1,000 registrations.

- Business Express Loan Program – The program was launched in 2019 in response to feedback from many small business owners stating that applying for credit was too difficult and had collateral requirements they could not meet. The program reduced the application time, reduced required documentation, and provided for an instant decision. The program was temporarily paused in March 2020 due to the COVID-19 pandemic and was re-launched in April 2022. During the evaluation period, the bank originated 96 loans totaling almost $7.0 million across the three AAs.

- Community Business Lending Initiative – Launched to approve loans to disadvantaged businesses in low- and moderate-income communities. During the evaluation period, the bank extended 11 small business loans totaling $275,000, providing capital for growth of these small businesses.

Bank Response to COVID-19 Pandemic

In March 2020, the World Health Organization declared COVID-19 pandemic. Due to the shelter-in-place orders, certain businesses deemed non-essential were shut down or limited in operations. The pandemic limited the ability of bank personnel to provide in-person services. Additionally, opportunities for virtual service deliveries were limited by the capacity of community organizations, and the ability of low- and moderate-income families and small businesses to access virtual technology. The evaluation of the bank's performance takes into consideration the impact of the pandemic.

The economic impact of the COVID-19 pandemic created additional barriers for home mortgage lending due to the increase in job losses, the significant increase in unemployment, and an increase in higher demand and higher home prices, which created a shortfall of homes for sale.

The bank participated in the Small Business Administration's (SBA) Paycheck Protection Program (PPP), which provided small businesses impacted by the pandemic with funds to cover payroll costs or other expenses.

According to an August 2022 study conducted by the U.S. Department of Labor, Covid-19 disproportionally affected lower wage earners, who generally faced more job displacement. These workers were more likely to hold jobs that required on-site work and social contact in sectors which were forced to shut down or faced reductions in staffing. To assist their borrowers experiencing financial difficulty due to the pandemic, the bank offered various services and relief options. The following were relief and services offered by the bank:

- Loan deferrals and modifications.
- Waived/refunded late fees on consumer loans and lines of credit.
- Offered hardship assistance, forbearance plan options, and waived late fees for mortgages.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the bank using large bank performance criteria, which includes a lending test, investment test, and service test. The lending test evaluates Dollar's record of meeting the credit needs of its AAs through its lending activities. The investment and service tests evaluate the bank's responsiveness to community development (CD) needs in its AAs. The evaluation period for the lending and CD tests is January 1, 2020, through December 31, 2022. 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. The bank does not offer farm loans. Qualifying activities performed in response to the significant impact of the COVID-19 pandemic across the US were considered in this evaluation. Examiners did not consider consumer loans in this evaluation, as consumer lending did not constitute a substantial majority of the bank's business.

During the evaluation period, Dollar merged with Standard Bank which added Allegany County, MD and Bedford County, PA to the institution's AAs. The merger was completed during September 2022. Accordingly, the OCC did not evaluate the bank's performance in these AAs as the three-month timeframe of data post-merger is not sufficient to support a meaningful analysis or conclusion.

Dollar's AAs were impacted by the 2020 U.S. Census demographic changes which took effect January 1, 2022. Examiners evaluated the bank's lending performance for the years 2020 and 2021 using 2015 American Community Survey (ACS) data. The bank's 2022 performance is evaluated separately utilizing 2020 U.S. Census data which reflects updated population and housing demographic information, as well as changes to the number and income designations of some CTs. Except where noted, the OCC provided more consideration to the bank's lending performance during the 2020-2021 period as it represented a longer period of performance. The OCC evaluated the bank's lending performance for the 2022 period in comparison to the 2020-2021 period and, where applicable, discussed the factors contributing to differences in lending performance between the two periods.

Performance between low-income and moderate-income categories was weighted equally unless otherwise noted. The loan distribution analyses compared home mortgage loans and small loans to businesses to demographic and aggregate data under the applicable Lending Test components.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) 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. In determining the overall rating, greater weight was given to the state of Pennsylvania, as the Pittsburgh MSA represents the bank's most significant AA in terms of deposit concentration, branch distribution, and HMDA reportable lending. Additionally, the bank is headquartered in Pittsburgh. Examiners placed more weight on the bank's HMDA lending as this represented a 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 state ratings are based on performance in all bank 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.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 Pennsylvania

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

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of home mortgage loans and an excellent geographic distribution of business loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and a good distribution of loans to business of different sizes, given the product lines offered by the institution.
- The bank had an excellent level of qualified CD investments and grants.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- The bank provided an excellent level of CD services.

Description of Institution's Operations in Pennsylvania

The bank delineated one AA within the state of Pennsylvania, which consisted of the Pittsburgh MSA. The Pittsburgh MSA consists of the Allegheny, Westmoreland, Washington, and Butler counties. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income CTs. Refer to Appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The state of Pennsylvania was the bank's largest rating area. Dollar maintained approximately $5.8 billion or 69.0 percent of its total deposits in this AA. The bank operated 37 branches or 46.8 percent of its total branches in this AA. The bank also operated 75 deposit-taking ATMs/PTMs within the state of Pennsylvania, representing 48.1 percent of total ATMs/PTMs. The bank originated or purchased 70.4 percent of its evaluation period lending within the Pittsburgh MSA.

According to FDIC Deposit Market Share data as of June 30, 2022, the bank had a deposit market share of 2.7 percent and ranked seventh out of 46 financial institutions. The top three banks by deposit market share consisted of $153.8 billion or 70.7 percent. The top depository financial institutions operating in this AA based on market share included PNC Bank, NA with 43.9 percent, The Bank of New York Mellon with 14.6 percent, and BNY Mellon, NA with 12.1 percent.

The following table provides a summary of demographics, housing, and business information for the AA.

Pittsburgh MSA

Table A - Demographic Information of the Assessment Area Assessment Area: Pittsburgh MSA 2020 - 2021						
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	207,707	5.3	13.5	40.3	40.1	1.0
Farms by Geography	4,666	2.4	10.6	55.4	31.5	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%

Source: 2015 ACS and 2021 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: Pittsburgh MSA 2022						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	616	7.8	20.8	41.4	26.3	3.7
Population by Geography	2,008,353	5.5	16.9	42.1	34.6	1.0
Housing Units by Geography	953,550	6.3	19.4	43.3	30.4	0.6
Owner-Occupied Units by Geography	593,028	2.8	15.8	45.8	35.4	0.2
Occupied Rental Units by Geography	269,365	11.8	24.6	39.0	23.2	1.4
Vacant Units by Geography	91,157	12.9	27.4	39.6	19.1	1.0
Businesses by Geography	237,188	5.6	13.8	37.6	41.1	1.9
Farms by Geography	5,164	2.4	13.3	50.6	33.1	0.6
Family Distribution by Income Level	507,241	19.1	17.5	20.9	42.5	0.0
Household Distribution by Income Level	862,393	24.2	15.4	17.4	43.1	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		$82,642	Median Housing Value			$175,619
			Median Gross Rent			$906
			Families Below Poverty Level			6.5%

Source: 2020 U.S. Census and 2022 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.

The 2020 U.S. Census changes affected the AA. Based on 2015 ACS data, in 2020 and 2021 the AA contained 605 CTs and included 57 low-income CTs, 126 moderate-income CTs, 263 middle-income CTs, and 144 upper-income CTs with 15 CTs having no income designation. Beginning in 2022, the AA includes 616 CTs and includes 48 low-income CTs, 128 moderate-income CTs, 255 middle-income CTs, and 162 upper-income CTs. Twenty-three CTs had no income designation. The area population was 2,008,353 with 110,459 (5.5 percent) residing in low-income CTs, and 339,412 (16.9 percent) residing in moderate-income CTs. There are no distressed or underserved CTs in the AA.

Additionally, based on 2022 aggregate home mortgage and small business data, there were 632 home mortgage and 155 small business lenders that originated or purchased loans within the AA.

Dollar ranked third in home mortgage lending with a 6.1 percent market share, which was in the top one percent of banks. The other top five banks in market share included PNC Bank, NA with 9.2 percent, CBNA with 8.2 percent, First Commonwealth Bank with 3.8 percent, and Rocket Mortgage with 3.8 percent. These four banks, plus Dollar, had a combined loan market share of 31.1 percent.

The bank ranked 19th in small business lending market share with 0.9 percent of the market, which was in the top 13.0 percent of lenders. The top five small business lenders by number of loans and market share include American Express National Bank with 22.0 percent, JPMorgan Chase Bank, NA with 13.3 percent, PNC Bank N.A. with 10.7 percent, Capital One, NA with 7.7 percent, and Citibank, NA with 6.5 percent. These banks accounted for 60.2 percent of the total market share.

Economic Data

Based on data from the Moody's Analytics report, Pittsburgh's employment gains were below the state. Manufacturing was a key source of strength, expanding four times as fast in the AA as it did nationally. Manufacturing was also a key source of high-wage jobs. In the Healthcare sector, the unemployment rate descended to its lowest point on record. Population trends increased the housing demand. According to Redfin.com, homes for sale stayed on the market longer in the AA than in other large metro areas in the Northeast.

The number of families living below the poverty level in 2021 and 2022 was 8.1 percent and 6.5 percent, respectively. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial ability to qualify for a home loan than those with income above the poverty level.

Key sectors of the economy based on percentage of total employment include Education and Health Services, Professional and Business Services, and Retail Trade. According to Moody's Analytics Report, the major employers in the AA include UPMC Health System, Highmark Health, University of Pittsburgh, PNC Bank, and Giant Eagle Inc.

Community Contacts

The OCC conducted two community contacts within the AA during the evaluation period, which included a county economic development agency and a city coalition nonprofit organization focused on LMI areas. Community contacts indicated that the following are needs within the bank's AA.

- Affordable housing and funding for home improvements,

- Willingness to accept a wide range of mortgage down payment and closing cost assistance,
- Innovative loan products with flexible credit guidelines,
- Flexible consumer and automobile loans,
- Small loans to small businesses particularly to start-up businesses,

Housing Characteristics

The housing market in the AA is challenged as demand exceeds housing supply, and prices continue to trend upwards. The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the above table, low-income families earned less than $34,812 in 2021 and $41,321 in 2022, and moderate-income families earned less than $55,699 in 2021 and $66,114 in 2022. The maximum low-income and maximum moderate-income annual income calculations are based on 50.0 percent and 80.0 percent of the FFIEC adjusted median family income for the AA. According to Realtor.com data, the median housing value in the AA is $189,900 and $209,698 in 2021 and 2022, respectively, reflecting a 10.4 percent increase. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the two analysis periods, the calculated maximum affordable monthly mortgage payment was between $870.00 and $1,033.00 for a low-income borrower and between $1,392.00 and $1,653.00 for a moderate-income borrower. Assuming a 30-year mortgage with a 6.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be $1,139.00 and $1,257.00. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Unemployment Rate

According to the U.S. Bureau of Labor Statistics (BLS), the Pittsburgh MSA unemployment rate decreased throughout the evaluation period. In January 2020, the rate was 4.9 percent compared to 3.5 percent in December 2022. The unemployment rate in the MSA was slightly higher than the overall rate for the state of Pennsylvania, which was 3.4 percent at the end of the evaluation period.

Scope of Evaluation in Pennsylvania

Examiners conducted a full-scope review of the Pittsburgh MSA AA, which is the only AA in the state of Pennsylvania. 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. The bank did not originate or purchase small loans to farms in this rating area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

The bank's performance under the Lending 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 MSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Pittsburgh MSA	14,082	3,173	0	34	17,289	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Pittsburgh MSA	$2,481,713	$345,834	0	$75,023	$2,902,570	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, the bank ranked seventh out of 46 FDIC-insured depository institutions (top 15.0 percent) with a 2.7 percent deposit market share.

Given the competition from other reporting lenders in the AA, Dollar's lending market share was excellent compared to its deposit market share in the AA. Based on the 2022 peer mortgage data, for home mortgage lending, the bank ranked third out of 632 lenders (top 1.0 percent) with a market share of 6.1 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base. Based on the 2022 peer small business data, the bank ranked 19th out of 155 lenders (top 12.0 percent) for number of loans, with a market share of 0.9 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibited 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 overall geographic distribution of home mortgage loans was good.

Examiners considered the low volume of owner-occupied housing units in low-income CTs and the high percentage of occupied rental units and vacant units in low-income CTs, which limits the bank's lending opportunities. For the 2020 through 2021 period, as identified in Table A above, there were only 2.9

percent or 16,815 owner-occupied housing units in low-income CTs, as compared to 11.7 percent or 30,313 occupied rental units and 13.6 percent or 12,537 vacant housing units in low-income CTs. For the 2022 period, owner-occupied housing units declined to 2.8 percent in low-income CTs, which further limited opportunities for lending in low-income geographies.

For 2020 through 2021, the percentage of home mortgage loans in low-income CTs was below the percentage of owner-occupied housing units located in those geographies and near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income CTs was below the percentage of owner-occupied housing units located in those geographies and was near to the aggregate percentage of all reporting lenders.

During 2022, the percentage of home mortgage loans in low-income CTs was near the percentage of owner-occupied housing units located in those geographies and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income CTs was below the percentage of owner-occupied housing units and near to the aggregate percentage of all reporting 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 overall geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses in low-income CTs exceeded both the percentage of businesses located in those CTs and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income CTs was below the percentage of businesses located in those CTs and near to the aggregate percentage of all reporting lenders.

During 2022, the percentage of small loans to businesses in low-income CTs exceeded both the percentage of businesses located in those CTs and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income CTs approximated both the percentage of businesses located in those CTs and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

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 of different sizes, given the product lines offered by the institution.

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 overall borrower distribution of home mortgage loans was excellent.

Examiners considered housing affordability, poverty levels, and the impact of the COVID-19 pandemic in developing conclusions.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was well below the percentage of the AA's low-income families but was near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of those families and approximated the aggregate percentage of all reporting lenders.

During 2022, the percentage of home mortgage loans to low-income borrowers was below the percentage of the AA's low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of the AA's low-income families and approximated the aggregate percentage of all reporting 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 overall borrower distribution of small loans to businesses was good.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less was well below the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders.

During 2022, the percentage of small loans to businesses with revenues of $1 million or less was below the percentage of businesses with revenues of $1 million or less but significantly exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution is a leader in making 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.

During the evaluation period, the bank originated 34 CD loans totaling approximately $75.0 million. This represents 9.0 percent of the bank's tier 1 capital allocated to the Pittsburgh MSA. These loans were highly responsive in helping the bank address community development needs and had a positive impact on the overall lending test rating.

The bank originated 90 PPP loans totaling $176.9 million that qualify as CD within the AA and two loans totaling $3.6 million outside the AA but within the state. Examples of CD loans in the AA include:

- $12.7 million in PPP loans to a nonprofit that provides mental health and other services to disabled individuals that are predominantly LMI.

- $14.6 million loan to finance affordable housing for LMI residents. This loan was to provide a bridge loan to the next renovation phase of 68 affordable housing units.

- $700,000 line of credit to a nonprofit that provides community and support services for LMI individuals and families. The line was to cover costs associated with a program that provides housing and rental assistance for individuals that are at risk for homelessness and another that provided a refuge to those highly vulnerable to Covid-19, including people living in street encampments and homeless shelters.

- $1.0 million line increase to a CDFI that provides capital and technical assistance to small businesses. The line was established to fund its small business and non-profit lending activities.

- $700,000 loan to a development company to help finance the revitalization and stabilization of the Pittsburgh neighborhood of East Liberty.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs.

Dollar offered several lending programs to assist low- and moderate-income borrowers obtain home loans and to address small business lending needs. The bank made use of responsive flexible lending during the pandemic in 2020 and 2021 by originating loans to stabilize small businesses and communities through the SBA PPP. The PPP activity received positive consideration, as it helped stabilize small businesses and communities.

The bank's home loan programs assisted borrowers with closing costs and offer loan terms that are more affordable to borrowers, including low- and moderate-income borrowers and first-time homebuyers. The bank partnered with public/non-profit housing organizations to create affordable loan programs. Following are examples of home loan programs offered in the state of Pennsylvania.

- Allegheny County Department of Economic Development Single Family Mortgage Revenue Bond Program offers below rate home mortgages throughout Allegheny County. A matching down-payment assistance grant to income-eligible borrowers is also available on a first-come, first-served basis.

- The Pittsburgh Home Rehabilitation Program (PHRP) offers a zero percent interest rate loan to help income eligible homeowners in the City of Pittsburgh to improve their homes. Homeowners may borrow up to $25,000 for a single-unit home and $35,000 for a two-unit home, for up to 20 years. In combination with the loan, the Pittsburgh Urban Redevelopment Authority (URA) provides grants for home repair and related needs, including replacement of public sidewalks, improvements to home exteriors, lead hazard removal and disability access. Dollar also partnered

with URA to originate and underwrite PHRP Plus loans, a new energy efficient loan program. During the evaluation period, Dollar originated eight URA PHRP loans for a total of $102,000.

Also refer to the Overall CRA Rating section for information on innovative and flexible programs available in all the bank's markets.

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 MSA is excellent.

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	4	2,155	489	43,202	495	100.0	45,357	100.0	1	354
Statewide	0	0	1	1,766	1	100.0	1,766	100.0	1	2,234

* 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 institution has an excellent level of qualified CD investments and grants. Dollar exhibits excellent responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified current period investments included 210 investments for $40.1 million primarily focused on affordable housing for low-and moderate-income AAs. As of year-end 2022, the bank also had four prior period investment with an outstanding balance of $2.2 million. Additionally, the bank provided 279 grants totaling $3.1 million. Grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals and revitalization and stabilization efforts. Over $136,000 of the grants were responsive to the COVID-19 pandemic. Total investments represented 5.4 percent of allocated tier 1 capital.

The following example demonstrate investments that were responsiveness to community needs:

- The bank purchased a $15,990,000 Fannie Mae DUS Mortgage-Backed Security. This investment supported the acquisition of a multi-family building consisting of 134 units of affordable housing at 95.5 percent occupancy. This investment has benefitted from a long-term Housing Assistance Payments (HAP) contract since it was constructed. The HAP contract restricts tenants to those earning 50.0 percent of area median income and those aged 62 and older.

- The bank purchased nine mortgage-backed security (MBS) pools totaling $13.7 million that supported affordable housing in the AA. The MBS investments consist of mortgages originated to low- and moderate-income borrowers in the AA.

- The bank made three Equity Equivalent Investments (EQ2) totaling $5.2 million in two local CDFIs and one redevelopment authority. These investments promoted revitalization and economic development through the financing of qualified affordable housing projects and small business lending in low- and moderate-income CTs in the Pittsburgh MSA. The investment was innovative as it was a new type of investment for Dollar, and it is considered complex.

- The bank made $3.1 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. Qualifying CDOs engage in activities around affordable housing, real estate development, social services, crime prevention, education, workforce development and other community revitalization efforts.

- The bank provided $1.8 million in 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. These donations ranged in amounts from $5 thousand to $60 thousand per year.

- The bank provided 87 grants totaling $363,085 under the "3-2-1" Matched Savings Program, which was modified to the "5-2-1" Matched Savings Program due to the affordability challenges created by the COVID-19 pandemic. The Home Ownership Program and the Matched Savings Program are discussed under Product Innovation and Flexibility.

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 MSA is excellent.

Retail Banking Services

Service delivery systems are readily 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	100.0	37	100.0	8.1	10.8	35.1	40.5	5.5	16.9	42.1	34.6

*Two branches (5.4%) are in a NA income designated CTs.

Dollar's branches and alternative delivery systems were effective in helping the bank provide services across the AA. The bank had three branches located in low-income CTs and four branches located in moderate-income CTs. The proportion of branches in low-income CTs exceeded the percentage of the population in those CTs. Additionally, several branches in middle- and upper-income CTs are near to

low- or moderate-income CTs. According to bank records, 22.3 percent of the bank's depositors are in low- or moderate-income census tracts.

In addition to the bank's branch network, Dollar had several alternative delivery systems, including ATMs, debit cards, online banking, mobile banking, PTM, and Zelle. The bank had 27 PTMs located in the Pittsburgh MSA, which provided a face-to-face experience for the customer and allowed the user to have real-time conversations about deposits, loans, and services offered by the bank. The bank also offered electronic bill pay and mobile banking options. Zelle was introduced by the bank in 2019 and allowed customers of numerous financial institutions to send and receive money within minutes. The bank was a part of several ATM networks (Freedom ATM alliance and All-Point ATM Network) which provided free access to over 2000 ATMs nationwide. These systems provided additional delivery availability and access to banking services to both retail and business customers.

Services, including where appropriate, business hours, did not vary in a way that inconveniences 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. Branch hours varied by location, with most operating 9am to 5pm Monday through Thursday with extended hours on Fridays and Saturdays. In addition, PTMs offered face to face interactions from 8am to 8pm Monday through Saturday.

Community Development Services

The institution is a leader in providing CD services.

CD services were responsive to community needs. Approximately 37 employees were involved in qualifying CD services during the evaluation period. These employees provided over 5,500 hours of financial education, technical assistance, or service on boards of directors and committees of over 120 qualified community organizations. Some activities of note include:

- Bank employees conducted over 200 financial management workshops attended by over 2,000 individuals.

- Bank employees conducted over 20 small business financing workshops. The workshops are free, and assist existing, new, and potential new business owners with low-cost leasing information, technical training, and business plan preparation.

- The bank held nearly 300 credit enhancement workshops as part of the bank's Home Ownership Program. Over 2,700 low- and moderate individuals attended these workshops during the evaluation period.

- Bank officers served as board members or treasurers for 51 organizations that provide community development and assistance for low- and moderate-income communities.

- Qualifying under the 2020 CRA rule, 30 employees volunteered in community service activities that benefited low- and moderate-income individuals.

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 reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of home mortgage loans and an excellent geographic distribution of business loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.
- The bank had a good level of qualified CD investments and grants.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- The bank provided a relatively high level of CD services.

Description of Institution's Operations in Ohio

The bank delineated two AAs in 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 AA. The AA does not arbitrarily exclude any low- or moderate-income CTs. Refer to Appendix A for a complete description of the AA.

The state of Ohio was the bank's second largest rating area. Dollar maintained approximately $2.4 billion or 28.6 percent of its total deposits in this AA. The bank operated 29 branches within the Cleveland CSA AA, representing 36.7 percent of total branches. The bank also operated 47 deposit-taking ATMs/PTMs within the state of Ohio, representing 30.1 percent of total ATMs/PTMs. The bank originated or purchased 26.6 percent of its evaluation period lending within the Cleveland CSA AA.

According to the June 30, 2022, FDIC Summary of Deposit Market Share Report, the bank had a deposit market share of 1.8 percent and ranked 10th out of 38 FDIC-insured depository institutions. The top three banks by deposit market share consisted of $86.1 billion or 62.5 percent. The top depository financial institutions operating in this AA based on market share included KeyBank NA with 38.9 percent, The Huntington National Bank with 13.2 percent, and PNC Bank, NA with 10.4 percent.

The following tables provide summaries of the demographics, housing, and business information for the AA.

Cleveland CSA

Table A - Demographic Information of the Assessment Area Assessment Area: Cleveland CSA 2020 - 2021						
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	196,552	9.9	17.2	32.4	39.8	0.8
Farms by Geography	4,493	5.1	13.7	39.5	41.6	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 and 2021 D&B Data; Due to rounding, totals may not equal 100.0%. (*) The NA category consists of CTs with no income classification.

Table A - Demographic Information of the Assessment Area Assessment Area: Cleveland CSA 2022						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	748	14.8	21.7	33.0	26.7	3.7
Population by Geography	2,533,282	10.5	19.3	35.8	33.0	1.4
Housing Units by Geography	1,172,092	12.5	21.6	34.9	29.1	1.9
Owner-Occupied Units by Geography	683,117	6.2	16.3	39.7	37.1	0.8
Occupied Rental Units by Geography	379,433	20.6	29.2	29.2	17.8	3.3
Vacant Units by Geography	109,542	24.5	28.1	25.2	18.4	3.7
Businesses by Geography	370,921	12.4	15.9	27.6	41.6	2.4
Farms by Geography	7,111	11.1	14.7	34.6	39.0	0.7
Family Distribution by Income Level	627,126	22.6	17.3	19.8	40.3	0.0
Household Distribution by Income Level	1,062,550	25.4	16.0	17.0	41.6	0.0
Median Family Inc - 10420 Akron		$76,842	Median Housing Value			$151,268
Median Family Inc- 17460 Cleveland		$76,766	Median Gross Rent			$857
			Families Below Poverty Level			10.0%

Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0% (*) The NA category consists of CTs with no income classification.

The 2020 U.S. Census changes affected the AA. Based on 2015 ACS data, in 2020 and 2021 the AA contained 752 CTs and included 147 low-income CTs, 174 moderate-income CTs, 240 middle-income CTs, 179 upper-income CTs and 12 CTs with no income designation. Beginning in 2022, the AA consists of 748 CTs and includes 111 low-income CTs, 162 moderate-income CTs, 247 middle-income CTs, and 200 upper-income CTs. Twenty-eight CTs have no income designation. The area population was 2,533,282 with 265,995 (10.5 percent) residing in low-income CTs, and 488,923 (19.3 percent) residing in moderate-income CTs. There are no distressed or underserved CTs in the AA.

Additionally, based on 2022 aggregate home mortgage and small business data, there were 609 home mortgage and 167 small business lenders that originated or purchased loans within the AA.

Dollar ranked 11th in home mortgage lending with a 1.9 percent market share, which was in the top 2.0 percent of lenders. The top five home mortgage lenders by number of loans and market share included Huntington National Bank with 9.7 percent, Third Federal Savings and Loan with 9.5 percent, Fifth Third Bank, NA with 5.6 percent, Rocket Mortgage with 5.3 percent, and Cross-Country Mortgage, LLC with 5.1 percent. These five banks had a combined loan market share of 35.2 percent.

The bank ranked 25th in small business lending with a 0.3 percent market share, which was in the top 15 percent of lenders. The top five small business lenders by number of loans and market share included American Express National Bank with 23.7 percent, JPMorgan Chase Bank, NA with 18.5 percent, Capital One, NA with 8.2 percent, US Bank NA with 7.3 percent, and The Huntington National Bank with 5.8 percent. The top five small business lenders had 63.5 percent of the total market share.

The following information illustrates details for the two MSAs included in the bank's Cleveland CSA.

Economic Data

Based on data from the Moody's Analytics report, Cleveland-Elyria's economy advanced but at a considerably slower pace than its peers Columbus and Cincinnati. The healthcare sector accounted for the majority share of new positions while consumer and financial service jobs fell. Single-family house prices rose to new heights, defying the national trend, while residential construction tapered off. Investment in the automotive industry helped increase jobs within the AA. Key sectors of the economy based on percentage of total employment included Education and Health Services, Professional and Business Services, Government, and Manufacturing. The major employers in the MSA included Cleveland Clinic Foundation, University Hospitals, U.S. Office of Personnel Management, Minute Men Group Management Services Inc., and First Energy Corp.

The number of families living below the poverty level in 2021 and 2022 was 11.7 percent and 10 percent, respectively. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial ability to qualify for a home loan than those with income above the poverty level.

Moody's Analytics noted that the Akron MSA economy was at risk with weak migration trends and shrinking population leaving manufacturing vulnerable to outsourcing. Net hiring in the auto industry was stagnant and healthcare providers trimmed payroll. Per capita income was below average and there were few jobs in high value services. Major employers included Summa Health System, Akron Children's Hospital, Cleveland Clinic, Minute Men HR Management Services, and First Energy Corporation.

Community Contacts

The OCC conducted two community contacts in the AA during the evaluation period, which included a nonprofit organization focused on neighborhood revitalization in low- and moderate-income areas, and a collaborative meeting of various community development agencies. In addition, examiners reviewed a county real estate housing market report, and a county health needs assessment. Dollar was recognized for providing support through its bilingual staff in communities. Community contacts indicated that the following are needs within the bank's AA.

- Home purchase and improvement loans in LMI areas,
- Increase in the supply of affordable housing including rental units,
- Funding for nonprofit programs,
- Funding for after-school and youth programs,
- Support for homebuyer counseling programs,
- Financial and homebuyer education,
- Small business lending to access capital needs,
- Training and workforce development,
- Training and technical assistance to small businesses, and
- Financing for acquisition and rehabilitation of multifamily buildings.

Housing Characteristics

The housing market in the AA was challenged as demand exceeded housing supply, and prices continued to trend upwards. The lack of affordable housing made it difficult for low-income families to purchase or rent homes in the AA.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the tables above, low-income families earned less than $32,910 in 2021 and $38,383 in 2022, and moderate-income families earned less than $56,657 in 2021 and $61,413 in 2022 in the Cleveland MSA. For the Akron MSA, low-income families earned less than $32,875 in 2021 and $38,421 in 2022, and moderate-income families earned less than $52,572 in 2021 and $61,473 in 2022. According to Realtor.com data, the median housing value in the Cleveland MSA is $181,500 and $189,900 in 2020 and 2022, respectively, reflecting a 4.6 percent increase. According to Realtor.com data, the median housing value in the Akron MSA is $146,450 and $179,900 in 2020 and 2022, respectively, reflecting a 22.8 percent increase.

The tables below illustrate 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 six percent interest rate. The maximum low-income and maximum moderate-income annual income calculations are based on 50 percent and 80 percent of the FFIEC adjusted median family income for the MSA, respectively. As the table illustrates, low-income borrowers in both the Cleveland and Akron MSAs would be challenged to afford a mortgage at the median home value as the payment calculation does not account for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses.

MSA Name	2021 Updated Median Family Income	Maximum Low-Income Annual Income	Maximum Monthly Mortgage Payment	Maximum Moderate-Income Annual Income	Maximum Monthly Mortgage Payment	2021 Median Home Value	Mortgage Payment Based on Home Value
Akron MSA	65,715	32,875	821	52,572	1,314	146,450	878
Cleveland MSA	65,821	32,910	823	56,657	1,416	181,500	1,088

MSA Name	2022 Updated Median Family Income	Maximum Low-Income Annual Income	Maximum Monthly Mortgage Payment	Maximum Moderate-Income Annual Income	Maximum Monthly Mortgage Payment	2022 Median Home Value	Mortgage Payment Based on Home Value
Akron MSA	76,842	38,421	960	61,473	1,536	179,900	1,079
Cleveland MSA	76,766	38,383	959	61,413	1,535	189,900	1,139

Unemployment Rate

According to the BLS, the Cleveland MSA unemployment rate decreased throughout the evaluation period. In January 2020, the rate was 4.7 percent compared to 3.3 percent in December 2022. For the Akron MSA, the unemployment rate decreased throughout the evaluation period. In January 2020, the rate was 5.3 percent compared to 3.6 percent in December 2022. The unemployment rates in the MSAs were near to or slightly above the overall rate for the state of Ohio, which was 3.4 percent at the end of the evaluation period.

Scope of Evaluation in Ohio

Examiners conducted a full-scope review of the Cleveland CSA AA, which is the only AA in the state of Ohio. 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. The bank did not originate or purchase small loans to farms in this rating area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

The bank's performance under the Lending Test in the state of 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 CSA is excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Cleveland CSA	5,146	1,375	0	6	6,527	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000s) *							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Cleveland CSA	$694,016	$133,507	$0	$8,858	$836,381	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, the bank ranked 10th out of 38 FDIC-insured depository institutions (top 26.3 percent) with a 1.8 percent deposit market share.

Given the competition from other reporting lenders in the AA, Dollar's lending market share is excellent compared to its deposit market share in the AA. Based on the 2022 peer mortgage data, for home mortgage lending, the bank ranked 11th out of 609 lenders (top 1.8 percent) with a market share of 1.9 percent. The bank's lending performance, relative to the number of lenders in this AA, is stronger than the bank's deposit base. Based on the 2022 peer small business data, the bank ranked 25th out of 167 lenders (top 15.0 percent) for number of loans, with a market share of 0.3 percent.

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 overall geographic distribution of home mortgage loans was good.

Examiners considered the low volume of owner-occupied housing units in low-income CTs and the high percentage of occupied rental units and vacant units in low-income CTs, which limits the bank's lending opportunities. For the 2020 through 2021 period, as identified in Table A above, there were only 7 percent or 46,886 owner-occupied housing units in low-income geographies, as compared to 23.3 percent or 84,797 occupied rental units and 29.5 percent or 38,628 vacant housing units in low-income geographies. For the 2022 period, owner-occupied housing units declined to 6.2 percent or 42,353 units in low-income CTs, which further limited opportunities for lending in low-income geographies.

For 2020 through 2021, the percentage of home mortgage loans in low-income CTs was below the percentage of owner-occupied housing units located in those geographies but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income CTs

was below the percentage of owner-occupied housing units located in those geographies but near to the aggregate percentage of all reporting lenders.

During 2022, the percentage of home mortgage loans in low-income CTs was below the percentage of owner-occupied housing units located in those geographies but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income CTs was near both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses in low-income CTs exceeded both the percentage of businesses located in those CTs and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income CTs exceeded both the percentage of businesses located in those CTs and the aggregate percentage of all reporting lenders.

During 2022, the percentage of small loans to businesses in low-income CTs exceeded both the percentage of businesses located in those CTs and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income CTs exceeded both the percentage of businesses located in those CTs and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

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 of different sizes, given the product lines offered by the institution.

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 overall borrower distribution of home mortgage loans was excellent.

Examiners considered housing affordability, poverty levels, and the impact of the COVID-19 pandemic in developing conclusions.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was well below the percentage of the AA's low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and exceeded the aggregate percentage of all reporting lenders.

During 2022, the percentage of home mortgage loans to low-income borrowers was well below the percentage of the AA's low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

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 overall borrower distribution of small loans to businesses was good.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less was well below the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders.

During 2022, the percentage of small loans to businesses with revenues of $1 million or less was well below the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution made an adequate level of CD loans. CD lending had a neutral impact on Dollar's Lending Test performance in this AA.

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.

During the evaluation period, the bank originated six CD loans totaling $8.9 million, which represented 2.6 percent of the bank's tier 1 capital allocated to the Cleveland CSA. All six loans were made under the federal PPP program to help businesses support ongoing operations during the COVID-19 pandemic and were responsive to the community credit needs.

Product Innovation and Flexibility

The institution makes extensive use of 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.

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.

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	5	1,145	288	12,274	293	100.0	13,419	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 institution has a good level of qualified CD investments and grants. Dollar exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified current period investments included seven investments for $10.6 million primarily focused on affordable housing for low-and moderate-income AAs. As of year-end 2022, the bank also had five prior period investment with an outstanding balance of $1.1 million. Additionally, the bank provided 281 grants totaling $1.7 million. Grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals and revitalization and stabilization efforts. Over $100,000 of the grants were responsive to the COVID-19 pandemic. Total investments represented 3.9 percent of allocated tier 1 capital.

The following example demonstrate investments that were responsiveness to community needs:

- Grants totaling $360,000 that were used to subsidize the cost of broadband internet for up to 1,000 households. This initiative was in direct response to the 2020 Census showing that Cleveland was the least connected major city in the country. The grants were responsive to the bank identified needs of the area and were especially timely with the impact of the COVID-19 pandemic on individuals and families that lacked digital connectivity.

- Grants totaling $559,596 that were provided under the bank's "3-2-1" Matched Savings Program, which was modified to the "5-2-1" Matched Savings Program due to the affordability challenges created by the COVID-19 pandemic. The Home Ownership Program and the Matched Savings Program are discussed under Product Innovation and Flexibility.

- Dollar invested in seven mortgage-backed security (MBS) pools totaling $10.6 million that supported affordable housing in the AA. Additionally, the bank's prior period investments included four MBS pools totaling $960,892. The MBS investments consist of mortgages originated to low- and moderate-income borrowers in the 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 was good.

Retail Banking Services

Service delivery systems were 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	100%	29	100%	6.9	24.1	34.5	31.0	10.5	19.3	35.8	33.0

Dollar's branches and alternative delivery systems were effective in helping the bank provide services across the AA. The bank had a limited presence in low-income CTs with two branches. The proportion of branches in moderate-income CTs exceeded the percentage of the population in those areas. No branches were opened or closed during the evaluation period.

In addition to the bank's branch network, Dollar had several alternative delivery systems, including ATMs, debit cards, online banking, mobile banking, PTMs, and Zelle. The bank had nine PTMs located in the Cleveland CSA AA, which provided a face-to-face experience for the customer and allowed the user to have real-time conversations about deposits, loans, and services offered by the bank. The bank also offered electronic bill pay and mobile banking options. Zelle was introduced by the bank in 2019 and allowed customers of numerous financial institutions to send and receive money within minutes. The bank was a part of several ATM networks (Freedom ATM alliance and All-Point ATM Network) which provide free access to over 2000 ATMs nationwide. These systems provided additional delivery availability and access to banking services to both retail and business customers.

Services, including where appropriate, business hours, did not vary in a way that inconveniences 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 8 a.m. to 8 p.m. Monday through Saturday.

Community Development Services

The bank provided a relatively high level of CD services. Over thirty employees provided financial education, technical assistance, or served on boards/committees of qualifying organizations, as well as participated in non-financial services that qualified under the 2020 CRA rule. Some examples of the activities provided include:

- Eleven employees provided 410 hours of financial education, home buyer education, financial literacy and technical assistance workshops and classes to 1,012 attendees,

- Fifteen bank officers served in leadership roles by providing 2,256 hours to 21 organizations that provide services primarily to low- and moderate-income individuals and communities and supported small businesses.

- Qualifying under the 2020 CRA rule, 56 employees provided non-financial services for food and clothing drives, and other activities that benefited low- and moderate-income individuals.

State Rating

State of Virginia

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

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a excellent geographic distribution of home mortgage loans and an excellent geographic distribution of business loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and good distribution to business of different sizes, given the product lines offered by the institution.
- The bank had an excellent level of qualified CD investments and grants.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- The bank provided a relatively high level of CD services.

Description of Institution's Operations in Virginia

The bank delineated one AA within the state of Virginia, which consisted of the Virginia Beach-Norfolk-Newport News MSA. The MSA consists of Chesapeake, Norfolk, and Virginia Beach counties. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income CTs. Refer to Appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The state of Virginia was the bank's third largest rating area. Dollar maintained approximately $200 million or 2.4 percent of its total deposits in this AA., the bank operated 13 branches or 16.5 percent of its total branches in this AA. The bank also operated 34 deposit-taking ATMs/PTMs within the state of Virginia representing 21.8 percent of total ATMs/PTMs. The bank originated or purchased 3.0 percent of its evaluation period lending within the Virginia Beach MSA.

According to FDIC Deposit Market Share data as of June 30, 2022, the bank had a deposit market share of 0.9 percent and was the tenth largest out of 16 financial institutions. The top three banks by deposit market share consisted of $16 billion or 73.6 percent. The top depository financial institutions operating in this AA based on market share included Towne Bank with 25.5 percent, Truist Bank with 25.3 percent, and Wells Fargo Bank, NA with 22.8 percent.

The following table provides a summary of demographics, housing, and business information for the AA.

Virginia Beach MSA

Table A - Demographic Information of the Assessment Area Assessment Area: Virginia Beach MSA 2020- 2021						
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	102,944	2.6	22.2	35.7	38.3	1.2
Farms by Geography	2,114	1.5	16.5	31.7	49.7	0.6
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		$69,773	Median Housing Value			$254,325
			Median Gross Rent			$1,161
			Families Below Poverty Level			9.2%

Source: 2015 ACS and 2021 D&B Data; Due to rounding, totals may not equal 100.0%; (*) The NA category consists of CTs with no income classification.

Table A - Demographic Information of the Assessment Area Assessment Area: Virginia Beach MSA 2022						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	254	6.7	24.0	33.9	32.7	2.8
Population by Geography	946,897	6.1	22.2	35.5	35.7	0.4
Housing Units by Geography	375,584	5.6	22.5	36.3	34.9	0.6
Owner-Occupied Units by Geography	212,960	2.1	15.0	38.8	44.0	0.2
Occupied Rental Units by Geography	135,414	10.9	33.3	33.5	21.3	1.0
Vacant Units by Geography	27,210	7.4	28.2	31.0	32.1	1.3
Businesses by Geography	128,719	3.5	22.0	36.5	36.7	1.2
Farms by Geography	2,420	1.9	18.4	36.7	42.5	0.5
Family Distribution by Income Level	233,931	19.1	18.0	21.2	41.8	0.0
Household Distribution by Income Level	348,374	20.8	16.4	19.1	43.7	0.0
Median Family Income MSA - 47260		$83,421	Median Housing Value			$280,348
			Median Gross Rent			$1,260
			Families Below Poverty Level			7.2%

Source: 2020 ACS Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0 (*) The NA category consists of CTs with no income classification.

The 2020 U.S. Census changes affected the AA. Based on 2015 ACS data, in 2020 and 2021 the AA contained 222 CTs and included 13 low-income CTs, 59 moderate-income CTs, 77 middle-income CTs, and 67 upper-income CTs. Six CTs had no income designation. Beginning in 2022, the AA consists of 254 CTs and includes 17 low-income CTs, 61 moderate-income CTs, 86 middle-income CTs, 83 upper-income CTs and seven CT without an income designation. The area population was 946,897 with 57,761 (6.1 percent) residing in low-income CTs, and 210,211 (22.2 percent) residing in moderate-income CTs. There are no distressed or underserved CTs in the AA.

Additionally, based on 2022 aggregate home mortgage and small business data, there were 525 home mortgage and 124 small business lenders that originated or purchased loans within the AA.

Dollar ranked 46th in home mortgage lending with a 0.5 percent market share, which is in the top 9.0 percent of lenders. The top five home mortgage lenders by number of loans and market share include Pennymac Loan Services LLC with 6.0 percent, Navy Federal Credit Union with 6.0 percent, Atlantic Bay Mortgage Group with 5.1 percent, Rocket Mortgage with 4.0 percent, and Mortgage Research Center with 3.6 percent. These five banks have a combined loan market share of 24.7 percent.

The bank ranked 24th in small business lending market share with 0.3 percent of the market, which is in the top 20.0 percent of lenders. The top five small business lenders by number of loans and market share include American Express National Bank with 27.4 percent, JPMorgan Chase Bank, NA with 8.8 percent, Bank of America NA with 8.3 percent, Capital One, NA with 7.9 percent, and Citibank, NA with 6.3 percent. The top five small business lenders had 58.6 percent of the total market share.

Economic Data

Based on data from the Moody's Analytics report, the AA's economic growth slowed slightly during the evaluation period. Employment growth slowed down and below the statewide level in hospitality and manufacturing. Education and healthcare employment grew significantly and led the state. The leisure and hospitality sector benefited from increased travel and new federal per diems in the AA. Despite consumers having a lower appetite for domestic travel than they had in the immediate aftermath of the pandemic, occupancy rates in the AA continued to increase.

The number of families living below the poverty level in 20202021 and 2022 was 9.2 percent and 7.2 percent, respectively. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial ability to qualify for a home loan than those with income above the poverty level, without flexible terms or reduced closing costs.

Key sectors of the economy based on percentage of total employment included Government, Professional and Business Services, Education and Health Services, and Leisure and Hospitality Services. According to Moody's Analytics Report, the major employers in the AA include Naval Station Norfolk, Sentara Healthcare, Riverside Regional Medical Center, Bon Secours Health System Inc., and Old Dominion University.

Community Contacts

Examiners considered information from two community contacts in the AA during the evaluation period, which included a nonprofit housing agency and nonprofit organization focused on economic development for small businesses. Dollar was recognized for providing support through funding and financial education. Community contacts indicated that the following are needs within the bank's AA.

- Affordable rental and single-family housing,
- Living wage employment,
- Financial education,
- Funding for nonprofit programs, and
- Small loans to small businesses particularly to start-up businesses.

Housing Characteristics

The housing market in the AA was challenged as demand exceeded housing supply, and prices continued to trend upwards. The lack of affordable housing made it difficult for low- and moderate-income families to purchase or rent homes in the AA.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the above table, low-income families earned less than $34,887 in 2021 and $41,711 in 2022, and moderate-income families earned less than $55,818 in 2021 and $66,737 in 2022. The maximum low-income and maximum moderate-income annual income calculations are based on 50.0 percent and 80.0 percent of the FFIEC adjusted median family income for the AA. According to Realtor.com data, the median housing value in the AA is $304,950 and $360,000 in 2021 and 2022, respectively, reflecting an 18.1 percent increase. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the two analysis periods, the calculated maximum affordable monthly mortgage payment was between $872.00 and $1,043.00 for a low-income borrower and between $1,395.00 and $1,668.00 for a moderate-income borrower. Assuming a 30-year mortgage with a 6.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be $1,828.00 for 2021 and $2,158.00 for 2022. This illustrates that both low and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Unemployment Rate

According to the BLS, the Virginia Beach MSA unemployment rate declined throughout the evaluation period. In January 2020, the rate was 3.2 percent compared to 2.8 percent in December 2022. The unemployment rate in the MSA was slightly higher than the overall rate for the state of Virginia, which was 2.5 percent at the end of the evaluation period.

Scope of Evaluation in Virginia

Examiners conducted a full-scope review of the Virginia Beach AA, which is the only AA in the state of Virginia. 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. The bank did not originate or purchase small loans to farms in this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Virginia Beach	516	233	0	1	750	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Virginia Beach	$124,156	$14,903	0	$1,000	$140,059	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, the bank ranked 10th out of 16 FDIC-insured depository institutions (top 62.5 percent) with a 0.9 percent deposit market share.

Given the competition from other reporting lenders in the AA, Dollar's lending market share is excellent compared to its deposit market share in the AA. Based on the 2022 peer mortgage data, for home mortgage lending, the bank ranked 46th out of 525 lenders (top 9.0 percent) with a market share of 0.5 percent. The bank's lending performance, relative to the number of lenders in this AA, is stronger than the bank's deposit base. Based on the 2022 peer small business data, for small loans to businesses, the bank ranked 24th out of 124 lenders (top 19.4 percent) for number of loans, with a market share of 0.25 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a excellent 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.

Examiners considered the low volume of owner-occupied housing units in low-income CTs and the high percentage of occupied rental units in low-income CTs, which limits the bank's lending opportunities. For the 2020 through 2021 period, as identified in Table C above, there were only 1.8 percent or 3,615 owner-occupied housing units in low-income CTs, as compared to 7.6 percent or 10,182 occupied rental units. Another 1,411 housing units were vacant. For the 2022 period, owner-occupied housing units increased slightly to 2.1 percent or 4,472 units in low-income CTs. The percentage of occupied rental units increased to 10.9 percent, or 14,760. The number of vacant units increased to 2,014.

For 2020 through 2021, the percentage of home mortgage loans in low-income CTs was near to both the percentage of owner-occupied housing units located in those CTs and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income CTs exceeded both the percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders.

During 2022, the percentage of home mortgage loans in low-income CTs was near to the percentage of owner-occupied housing units located in those CTs and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income CTs was below both the percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders.

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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses in low-income CTs exceeded both the percentage of businesses located in those CTs and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income CTs approximated the percentage of businesses located in those CTs and exceeded the aggregate percentage of all reporting lenders.

During 2022, the percentage of small loans to businesses in low-income CTs was below the percentage of businesses located in those CTs and near to the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income CTs was well below both the percentage of businesses located in those CTs and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

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 of different sizes, given the product lines offered by the institution.

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 overall borrower distribution of home mortgage loans was excellent.

Examiners considered housing affordability, poverty levels, and the impact of the COVID-19 pandemic in developing conclusions. For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was well below the percentage of the AA's low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers approximated the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders.

During 2022, the percentage of home mortgage loans to low-income borrowers was well below the percentage of the AA's low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was near the percentage of the AA's low-income families and approximated the aggregate percentage of all reporting lenders.

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 overall borrower distribution of small loans to businesses was good.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less was well below the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders.

During 2022, the percentage of small loans to businesses with revenues of $1 million or less was below the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution has made an adequate level of CD loans.

The Lending Activity Table, 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.

During the evaluation period, the bank originated a $1 million line of credit to a Community Development Financial Institution (CDFI) that provides loan and investment solutions for affordable housing and economic development projects in the Commonwealth of Virginia. This represented 3.5 percent of the bank's tier 1 capital allocated to the Virginia Beach MSA. 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.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Dollar has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The bank exhibits good responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
Full Scope	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Virginia Beach	2	718	77	5,116	79	100.0	5,835	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 institution has an excellent level of qualified CD investments and grants. Dollar exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified current period investments included four investments for $4.7 million primarily focused on affordable housing for low-and moderate-income individuals. As of year-end 2022, the bank also had two prior period investment with an outstanding balance of $718,571. Additionally, the bank provided 73 grants totaling $388,300. Grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals and revitalization and stabilization efforts. Total investments represented 20.3 percent of allocated tier 1 capital.

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 AA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
	Deposits	Branches						Population			
Assessment Area *Full Scope*	% 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
Virginia Beach	100.0	13	100.0	7.7	0	53.8	38.5	6.1	22.2	35.5	35.7

The bank's branches and alternative delivery systems were effective in helping the bank provide services across the community. The bank had one branch in a low-income CTs and none in moderate-income CTs. Due to the bank's limited presence in the AA, this performance is considered adequate. Branches in low-income CTs exceeded the population in that geography. According to bank records, 28.0 percent of Virginia depositors were in low- or moderate-income CTs.

In addition to the bank's branch network, Dollar operated several alternative delivery systems, including ATMs, debit cards, online banking, mobile banking, PTM, and Zelle. The bank had 32 PTMs located in the Virginia Beach MSA, which provided a face-to-face experience for the customer and allowed the user to have real-time conversations about deposits, loans, and services offered by the bank. The bank also offered electronic bill pay and mobile banking options. The bank was part of several ATM networks (Freedom ATM alliance and All-Point ATM Network) which provided free access to over 2000 ATMs nationwide. These systems provided additional delivery availability and access to banking services to both retail and business customers.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly low- and moderate-income CTs and/or individuals. Dollar maintained 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 were open Saturdays. Eleven branches operated drive-thrus from the hours of 8am to 8pm Monday-Saturday and all branches had PTM machines with the same hours.

Community Development Services

The institution provided a relatively high level of CD services. Over thirty employees provided financial education, technical assistance, or served on boards/committees of qualifying organizations, as well as participated in non-financial services that qualified under the 2020 CRA rule. Primary examples include:

- Employees provided 476 hours for financial education, home buyer education, financial literacy and technical assistance workshops and classes to 1,020 attendees.

- Bank officers served in leadership roles, such as board members, by providing 1,338 hours to 14 organizations that provide community development services to low- and moderate-income individuals and families.

- Qualifying under the 2020 CRA rule, employees volunteered 80 hours for food drives, youth shelters, and other activities that benefited low- and moderate-income individuals.

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:	January 1, 2020, to December 31, 2022	
Bank Products Reviewed:	(Home mortgage, small business, community development loans, qualified investments, community development services)	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
State		
Pennsylvania		
Pittsburgh MSA	Full scope	Allegheny, Butler, Washington, and Westmoreland counties
Ohio		
Cleveland CSA	Full scope	Summit county (Akron, OH MSA) Cuyahoga, Lake, Lorain, and Medina counties (Cleveland, OH MSA)
Virginia		
Virginia Beach MSA	Full scope	Chesapeake, Norfolk, and Virginia Beach counties

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	Outstanding	Outstanding	Outstanding	Outstanding
MMSA or State:				
Pennsylvania	Outstanding	Outstanding	Outstanding	Outstanding
Ohio	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Virginia	Outstanding	Outstanding	High Satisfactory	Outstanding

(*) 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Pennsylvania Lending

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$ (000)	% 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	10,212	1,829,066	100.0	97,171	2.9	1.1	1.5	14.0	8.6	10.4	50.3	42.9	45.3	32.7	47.4	42.8	0.0	0.0	0.0
Total	**10,212**	**1,829,066**	**100.0**	**97,171**	**2.9**	**1.1**	**1.5**	**14.0**	**8.6**	**10.4**	**50.3**	**42.9**	**45.3**	**32.7**	**47.4**	**42.8**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 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 **2022**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$ (000)	% 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 2022	3,870	652,646	100.0	63,431	2.8	2.5	2.2	15.8	11.4	13.2	45.8	40.3	42.7	35.4	45.7	41.7	0.2	0.1	0.1
Total	**3,870**	**652,646**	**100.0**	**63,431**	**2.8**	**2.5**	**2.2**	**15.8**	**11.4**	**13.2**	**45.8**	**40.3**	**42.7**	**35.4**	**45.7**	**41.7**	**0.2**	**0.1**	**0.1**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2020-21**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	$ (000)	% 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	10,212	1,829,067	100.0	97,171	20.2	7.4	8.2	16.9	17.1	17.2	20.3	24.1	20.9	42.6	48.4	38.6	0.0	2.9	15.0
Total	**10,212**	**1,829,067**	**100.0**	**97,171**	**20.2**	**7.4**	**8.2**	**16.9**	**17.1**	**17.2**	**20.3**	**24.1**	**20.9**	**42.6**	**48.4**	**38.6**	**0.0**	**2.9**	**15.0**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 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 **2022**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	$ (000)	% 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	3,870	652,646	100.0	63,431	19.1	12.0	11.6	17.5	19.5	19.9	20.9	22.0	20.9	42.5	39.6	34.1	0.0	6.9	13.5
Total	**3,870**	**652,646**	**100.0**	**63,431**	**19.1**	**12.0**	**11.6**	**17.5**	**19.5**	**19.9**	**20.9**	**22.0**	**20.9**	**42.5**	**39.6**	**34.1**	**0.0**	**6.9**	**13.5**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2020-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$ (000)	% 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	2,805	291,077	100.0	50,464	5.3	5.4	4.0	13.5	10.2	11.8	40.3	34.8	38.9	40.1	49.2	36.6	1.0	0.4	8.7
Total	**2,805**	**291,077**	**100.0**	**50,464**	**5.3**	**5.4**	**4.0**	**13.5**	**10.2**	**11.8**	**40.3**	**34.8**	**38.9**	**40.1**	**49.2**	**36.6**	**1.0**	**0.4**	**8.7**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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 **2022**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$ (000)	% 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 2022	368	54,757	100.0	41,227	5.6	6.5	4.2	13.8	13.0	13.1	37.6	34.5	39.3	41.1	42.9	39.5	1.9	3.0	3.9
Total	**368**	**54,757**	**100.0**	**41,227**	**5.6**	**6.5**	**4.2**	**13.8**	**13.0**	**13.1**	**37.6**	**34.5**	**39.3**	**41.1**	**42.9**	**39.5**	**1.9**	**3.0**	**3.9**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2020-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pittsburgh MSA	2,805	291,077	100.0	50,464	86.2	48.0	47.8	4.4	21.6	9.4	30.4
Total	**2,805**	**291,077**	**100.0**	**50,464**	**86.2**	**48.0**	**47.8**	**4.4**	**21.6**	**9.4**	**30.4**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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 **2022**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pittsburgh MSA	368	54,757	100.0	41,227	87.8	61.1	49.4	3.8	28.3	8.4	10.6
Total	**368**	**54,757**	**100.0**	**41,227**	**87.8**	**61.1**	**49.4**	**3.8**	**28.3**	**8.4**	**10.6**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Ohio Lending

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$ (000)	% 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	3,617	490,160	100.0	126,424	7.0	4.1	3.9	17.5	13.0	14.2	38.0	38.2	38.3	37.3	44.5	43.6	0.1	0.1	0.0
Total	**3,617**	**490,160**	**100.0**	**126,424**	**7.0**	**4.1**	**3.9**	**17.5**	**13.0**	**14.2**	**38.0**	**38.2**	**38.3**	**37.3**	**44.5**	**43.6**	**0.1**	**0.1**	**0.0**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 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 **2022**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$ (000)	% 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	1,529	203,856	100.0	81,557	6.2	5.3	5.0	16.3	14.1	15.4	39.7	38.8	40.5	37.1	41.5	38.6	0.8	0.3	0.5
Total	**1,529**	**203,856**	**100.0**	**81,557**	**6.2**	**5.3**	**5.0**	**16.3**	**14.1**	**15.4**	**39.7**	**38.8**	**40.5**	**37.1**	**41.5**	**38.6**	**0.8**	**0.3**	**0.5**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2020-21**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	**#**	**$ (000)**	**% 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	3,617	490,160	100.0	126,424	23.0	11.2	9.7	16.8	21.4	19.6	19.7	25.5	21.4	40.5	39.8	34.7	0.0	2.1	14.6
Total	**3,617**	**490,160**	**100.0**	**126,424**	**23.0**	**11.2**	**9.7**	**16.8**	**21.4**	**19.6**	**19.7**	**25.5**	**21.4**	**40.5**	**39.8**	**34.7**	**0.0**	**2.1**	**14.6**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 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 **2022**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	**#**	**$ (000)**	**% 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	1,529	203,856	100.0	81,557	22.6	11.8	10.0	17.3	23.5	21.5	19.8	22.8	21.0	40.3	35.6	33.0	0.0	6.3	14.4
Total	**1,529**	**203,856**	**100.0**	**81,557**	**22.6**	**11.8**	**10.0**	**17.3**	**23.5**	**21.5**	**19.8**	**22.8**	**21.0**	**40.3**	**35.6**	**33.0**	**0.0**	**6.3**	**14.4**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2020-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$ (000)	% 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	1,208	114,663	100.0	62,284	9.9	10.3	9.3	17.2	20.4	17.2	32.4	27.0	31.7	39.8	40.9	41.2	0.8	1.4	0.7
Total	**1,208**	**114,663**	**100.0**	**62,284**	**9.9**	**10.3**	**9.3**	**17.2**	**20.4**	**17.2**	**32.4**	**27.0**	**31.7**	**39.8**	**40.9**	**41.2**	**0.8**	**1.4**	**0.7**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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 **2022**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$ (000)	% 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	167	18,844	100.0	55,671	12.4	13.8	7.8	15.9	17.4	15.4	27.6	31.1	31.4	41.6	35.9	44.0	2.4	1.8	1.5
Total	**167**	**18,844**	**100.0**	**55,671**	**12.4**	**13.8**	**7.8**	**15.9**	**17.4**	**15.4**	**27.6**	**31.1**	**31.4**	**41.6**	**35.9**	**44.0**	**2.4**	**1.8**	**1.5**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2020-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cleveland CSA	1,208	114,663	100.0	62,284	83.5	50.5	48.9	6.1	21.1	10.4	28.4
Total	**1,208**	**114,663**	**100.0**	**62,284**	**83.5**	**50.5**	**48.9**	**6.1**	**21.1**	**10.4**	**28.4**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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 **2022**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cleveland CSA	167	18,844	100.0	55,671	91.1	74.3	50.4	3.2	22.8	5.7	3.0
Total	**167**	**18,844**	**100.0**	**55,671**	**91.1**	**74.3**	**50.4**	**3.2**	**22.8**	**5.7**	**3.0**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Virginia Beach Lending

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$ (000)	% 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	345	85,514	100.0	69,720	1.8	1.4	2.0	17.4	17.7	17.2	36.7	29.6	35.5	43.9	50.7	45.0	0.2	0.6	0.3
Total	**345**	**85,514**	**100.0**	**69,720**	**1.8**	**1.4**	**2.0**	**17.4**	**17.7**	**17.2**	**36.7**	**29.6**	**35.5**	**43.9**	**50.7**	**45.0**	**0.2**	**0.6**	**0.3**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 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 **2022**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$ (000)	% 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	171	38,642	100.0	36,663	2.1	1.8	2.9	15.0	11.1	17.3	38.8	40.4	38.7	44.0	46.8	40.7	0.2	0.0	0.4
Total	**171**	**38,642**	**100.0**	**36,663**	**2.1**	**1.8**	**2.9**	**15.0**	**11.1**	**17.3**	**38.8**	**40.4**	**38.7**	**44.0**	**46.8**	**40.7**	**0.2**	**0.0**	**0.4**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2020-21**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	**#**	**$ (000)**	**% 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	345	85,514	100.0	69,720	20.4	4.9	3.8	17.4	17.1	15.1	20.5	24.1	18.4	41.7	47.0	29.3	0.0	7.0	33.4
Total	**345**	**85,514**	**100.0**	**69,720**	**20.4**	**4.9**	**3.8**	**17.4**	**17.1**	**15.1**	**20.5**	**24.1**	**18.4**	**41.7**	**47.0**	**29.3**	**0.0**	**7.0**	**33.4**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 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 **2022**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	**#**	**$ (000)**	**% 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	171	38,642	100.0	36,663	19.1	4.1	5.0	18.0	17.5	20.6	21.2	26.9	22.7	41.8	45.6	30.0	0.0	5.8	21.7
Total	**171**	**38,642**	**100.0**	**36,663**	**19.1**	**4.1**	**5.0**	**18.0**	**17.5**	**20.6**	**21.2**	**26.9**	**22.7**	**41.8**	**45.6**	**30.0**	**0.0**	**5.8**	**21.7**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2020-21**

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	182	10,691	100.0	21,490	2.6	3.3	2.3	22.2	21.4	20.8	35.7	41.8	35.7	38.3	32.4	39.3	1.2	1.1	1.9
Total	**182**	**10,691**	**100.0**	**21,490**	**2.6**	**3.3**	**2.3**	**22.2**	**21.4**	**20.8**	**35.7**	**41.8**	**35.7**	**38.3**	**32.4**	**39.3**	**1.2**	**1.1**	**1.9**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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 **2022**

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	51	4,212	100.0	20,046	3.5	2.0	2.4	22.0	11.8	19.0	36.5	54.9	38.5	36.7	31.4	37.9	1.2	0.0	2.1
Total	**51**	**4,212**	**100.0**	**20,046**	**3.5**	**2.0**	**2.4**	**22.0**	**11.8**	**19.0**	**36.5**	**54.9**	**38.5**	**36.7**	**31.4**	**37.9**	**1.2**	**0.0**	**2.1**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2020-21**

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	182	10,691	100.0	21,490	89.1	64.3	45.1	3.0	13.2	7.8	22.5
Total	**182**	**10,691**	**100.0**	**21,490**	**89.1**	**64.3**	**45.1**	**3.0**	**13.2**	**7.8**	**22.5**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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 **2022**

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	51	4,212	100.0	20,046	91.2	78.4	49.7	2.3	11.8	6.5	9.8
Total	**51**	**4,212**	**100.0**	**20,046**	**91.2**	**78.4**	**49.7**	**2.3**	**11.8**	**6.5**	**9.8**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%