

PUBLIC DISCLOSURE

June 25, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Monroe Federal Savings & Loan Association Charter Number 703692

> 24 E Main Street Tipp City, OH 45371

Office of the Comptroller of the Currency

West Lake Center 4555 Lake Forest Drive, Suite 520 Blue Ash, OH 45242-3760

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.



SMALL BANK

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Overall CRA Rating

The Lending Test is rated: <u>Satisfactory.</u>

The following major factors support Monroe Federal Savings & Loan Association's (Monroe or the thrift) rating:

- The thrift's average loan-to-deposit ratio is more than reasonable when compared to similarly situated financial institutions.
- The thrift makes a majority of its loans within the identified assessment area (AA).
- Lending to borrowers of different income levels and businesses of different sizes reflects reasonable penetration.
- Monroe's performance in lending to geographies of different income levels exhibits reasonable dispersion throughout the AA.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area (MA)/AA.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development (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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's AAs or outside the AAs provided the bank has adequately addressed the community development needs of its AAs.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

Full 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancing, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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 (MSA): 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 MSA 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA evaluation. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

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

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.

Description of Institution

Monroe is a mutual thrift, which means there are no stockholders. The depositors are the owners of the thrift, and they elect the Board of Directors. Monroe operates its main branch in Tipp City, located in Miami County, Ohio, which is about 16 miles north of Dayton. Monroe has two additional branches in Montgomery County, which are located in Vandalia, Ohio and Dayton, Ohio. Each branch has its own ATM. Monroe has not closed or opened any branches during the review period.

Monroe has designated one AA in the Dayton, OH MSA #19380. This AA consists of 13 census tracts (CT) in the southern portion of Miami County and 27 CTs in the northern half of Montgomery County. The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- or moderate-income areas.

Monroe offers traditional thrift products, including standard checking, deposit, and negotiable on withdrawal (NOW) accounts. Loan products include one- to four-family primary and investment properties, home equity lines of credit, multifamily, and commercial real estate.

As of March 30, 2018, Monroe reported total assets of \$96.5 million, tier 1 capital of \$11.6 million or 12 percent of total assets, and \$66.6 million in net loans or 66 percent of total assets. Loan origination volume during the evaluation period consisted of approximately 78 percent commercial/commercial real estate loans and 21 percent residential real estate loans.

Overall competition for loans and deposits within the bank's marketing area is strong, and comes primarily from local community banks and credit unions, as well as branches of regional/national institutions. The Dayton area has increasing competition for loans. This is due to new subdivisions being built and increased housing for the local college. The smaller institutions, like Monroe, have a hard time competing with the larger institutions and local credit unions on prices and fees. According to the FDIC June 30, 2017, market share report, 100 percent of Monroe's deposit base is within Montgomery and Miami counties.

Currently, no legal or financial impediments exist that could restrict the thrift's ability to serve the community's credit needs. Monroe received a Satisfactory CRA rating at the previous CRA evaluation, as of August 6, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We conducted a full-scope CRA evaluation to assess the thrift's record of meeting the credit needs of its entire community, including low- and moderate-income areas. The evaluation period was September 30, 2013 through March 30, 2018. We used small bank CRA evaluation procedures to assess the thrift's performance under the Lending Test. The Lending Test includes loans originated or purchased from January 1, 2015, through December 31, 2017 (lending evaluation period). Residential real estate and commercial real estate are the bank's primary products and were evaluated in the lending test.

The bank filed Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LAR) for 2015 and 2016 but not 2017 due to the reporting threshold not being met. They also did not generate enough loans in 2015 to conduct a full sample of 20 loans. Therefore we combined 2015 and 2016 data in order to evaluate lending performance. We randomly sampled 20 loans originated/purchased during the 2015-2016 evaluation period and 20 during the 2017 evaluation period for both residential and commercial real estate loans. Additionally, the demographic data used to compare Monroe Federal's results differs between the periods. 2015/2016 sample results are compared to 2010 Census Data and the 2017 sample results are compared with the 2015 American Community Survey (ACS) results.

Data Integrity

Monroe's data integrity processes and procedures are appropriate and no issues were noted. Based on the low volume of loans that Monroe originated during our review period, we did not perform a stand-alone data integrity examination. Instead we completed a file review while onsite. Our file review did not identify any data integrity issues. We did not identify any errors from the sample.

Selection of Areas for Full-Scope Review

We completed a full-scope review of the thrift's only AA, the Dayton MSA, described within the Description of the Institution section of this report.

Ratings

The thrift's overall rating is based on the review of the Dayton MSA.

Discriminatory or Other Illegal Credit Practices Review

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

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

The OCC will consider any information that this thrift engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the thrift'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.

Conclusions with Respect to Performance Tests

LENDING TEST

Monroe's lending performance is satisfactory.

Loan-to-Deposit (LTD) Ratio

The LTD ratio is more than reasonable given the size, financial conditions, and AA's credit needs. The thrift has an average LTD ratio of 82 percent in the 19 quarters (September 30, 2013 through March 31, 2018) since the last CRA evaluation. The thrift's quarterly LTD ratio ranged from a low of 72.8 percent at March 31, 2017, to high of 88 percent at September 30, 2014. This is higher than the average of four comparable institutions in Miami and Montgomery counties, which amounted to 71.3 percent over the same time period.

Lending in Assessment Area

The thrift's record of lending within its AAs reflects a majority of Monroe's lending inside its AA. As outlined in the description of the thrift above, the thrift's primary loan types are residential and commercial real estate loans. Table 1 details the thrift's 2015-2016 lending within the AA by number and dollar volume and Table 1a details 2017 lending activity. According to our combined analysis for 2015-2017, the bank made 72.5 percent of all loans and 44.3 percent of total dollar amount of loans within its AA. While 56 percent of the total dollar of loans were originated outside of the AA, the distribution was skewed by a few large dollar loans made outside of the AA, meaning the majority of lending activity was conducted inside the AA.

	Table 1 Lending in Dayton MSA 2015-2016									
	Number of Loans					Dollars of Loans				
	In	side	Ou	tside	Total	Inside		Outside		Total (000)
Loan Type	#	%	#	%		\$ (000)	%	\$ (000)	%	
Residential RE	18	90%	2	10%	20	\$1,808	78%	\$520	12%	\$2,328
Commercial RE	9	45%	11	55%	20	\$3,382	33%	\$6,944	67%	\$10,326
Totals	27	67%	13	33%	40	\$5,190	41%	\$7,464	59%	\$12,654

Source: Loan sample; loans originated/purchased from January 1, 2015 – December 31, 2017

	Table 1a Lending in Dayton MSA 2017									
	Number of Loans					Dollars of Loans				
	In	side	Ou	ıtside	Total	Inside		Outside		Total (000)
Loan Type	#	%	#	%		\$ (000)	%	\$ (000)	%	
Residential RE	18	90%	2	10%	20	\$2,641	99%	\$38	1%	\$2,679
Commercial RE	13	65%	7	35%	20	\$4,545	36%	\$8,081	64%	\$12,626
Totals	31	78%	9	22%	40	\$7,186	47%	\$8,119	53%	\$15,305

Source: Loan sample; loans originated/purchased from January 1, 2015 – December 31, 2017

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Lending to borrowers of different income levels and business of different sizes reflects reasonable penetration.

Monroe's distribution of residential real estate loans to borrowers of different incomes reflects reasonable penetration in both evaluation periods. In 2015/2016, the bank made 38.9 percent of loans to low and moderate income borrowers, compared to 35.8 percent of low and moderate income families in the AA.

In 2017, Monroe's lending to moderate and low income borrowers reflects reasonable penetration as 21 percent of residential real estate loans were extended to moderate and low income families, compared with 36 percent of low and moderate income families in the AA. This is reasonable considering that 9.1 percent of the AA low income families lived below the poverty level, and total lending activity being minimal during the period. Please refer to the following tables for detail.

Borrow	Table 2 Borrower Distribution of Residential Real Estate Loans in the Dayton MSA AA 2015/2016								
Borrower Income Level	Lo	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	
Home Purchase	19.5%	5.6%	16.3%	5.6%	18.3%	11.1%	45.9%	16.7%	
Home Improvement	19.5%	0.0%	16.3%	11.1%	18.3%	5.6%	45.9%	0%	
Refinancing	19.5%	5.6%	16.3%	11.1%	18.3%	5.6%	45.9%	22.2%	
Total	19.5%	11.1%	16.3%	27.8%	18.3%	22.2%	45.9%	38.9%	

Source: Sample of 18 Residential Real Estate loans in this AA. Demographic data is based on the 2010 U.S Census.

Borre	Table 2.1 Borrower Distribution of Residential Real Estate Loans in the Dayton MSA AA 2017								
Borrower Income Level	Low		Moderate		Middle		Upper		
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	
Home Purchase	19.60%	5.3%	16.40%	0.00%	18.20%	5.3%	45.80%	31.6%	
Home Improvement	19.60%	5.3%	16.40%	0.00%	18.20%	0.00%	45.80%	5.3%	
Refinancing	19.60%	0.00%	16.40%	10.5%	18.20%	15.8%	45.80%	21.1%	
Total	19.6%	10.5%	16.4%	10.5%	18.2%	21.1%	45.8%	57.9%	

Source: Sample of 19 Residential Real Estate loans in this AA. Demographic data is based on the 2015 ACS.

Monroe's lending to businesses of different sizes reflects reasonable penetration. The majority of loans in the business loan sample were to small businesses with annual gross revenues of less than \$1 million. Monroe originated 78 percent of the loans in the this sample to businesses with gross revenues of \$1 million or less in years 2015 and 2016, and 84.6 percent in year 2017. These origination levels are comparable to the percentage of businesses in the AA for each time period, with 79 percent of businesses having gross revenues of \$1 million or less in 2015 and 2016, and 80 percent in 2017. Refer to the following tables for more detail on the borrower distribution of business loans in our sample.

Borrower Distr	Table 2a Borrower Distribution of Loans to Businesses in the Dayton MSA AA 2015/2016							
Business Revenue (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total				
% of AA Businesses	79.40%	6.10%	14.50%	100%				
% of Bank Loans in AA by #	77.78%	22.22%	0.00%	100%				
% of Bank Loans in AA by \$	17.21%	82.79%	0.00%	100%				
Totals	60%	35%	5%	100%				

Source: Sample of 9 commercial loans in this AA.

Borrower Dis	Table 2a.1 Borrower Distribution of Loans to Businesses in the Dayton MSA AA 2017							
Business Revenue (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total				
% of AA Businesses	80.2%	6.80%	13.00%	100%				
% of Bank Loans in AA by #	84.62%	7.69%	7.69%	100%				
% of Bank Loans in AA by \$	80.20%	6.80%	13.00%	100%				
Totals	70%	25%	5%	100%				

Source: Sample of 13 commercial loans in this AA.

Geographic Distribution of Loans

Monroe's geographical distribution of loans reflects reasonable dispersion compared to both sampling and aggregate levels. Competition for loans is strong in the thrift's AA. Monroe's AA contains primarily middle and upper income tracts, with 88 percent of owner occupied households in the AA located in these geographies. In 2015/2016, there were no low-income CTs and the six moderate-income CTs in the bank's AA were located in Montgomery County. Monroe's loan origination was minimal during 2015 and 2016 but increased in 2017. They originated 9 residential and 5 commercial real estate loans in 2015, 22 residential and 8 commercial real estate loans in 2016, and 43 residential and 19 commercial real estate loans in 2017. 91.5 percent of the population lived above the poverty level in 2017. The Dayton area has increasing competition for loans from larger institutions and local credit unions. New subdivisions and housing for the local college have increased since 2015. Smaller institutions, like Monroe, have a hard time competing with the larger institutions and local credit unions on prices and fees. This resulted in limited opportunities to lend to low income families.

	Table 3 Geographic Distribution of Residential Real Estate Loans in the Dayton MSA 2015-2016							
Census								
Tract	% Т	hrift Loans by	/ Type	% of Loans	from AA Len	ders by Type		
Income	70 Thint Loans by Type			70 01 200110	THOM TO CLOSE	dolo by Typo	% of AA Owner	
Level						Occupied Housing		
Loan	Durchacac	hases Refinances Improvement Purchases Refinances	Home					
Type	ruiciiases	Reiliances	Improvement	ruiciiases	Reiliances	Improvement		
Low	0%	0%	0%	16%	7%	14%	2.47%	
Moderate	0%	37.5%	25%	27%	19%	22%	10.42%	
Middle	12.5%	12.5%	50%	26%	26%	29%	61.09%	
Upper	87.5%	50%	25%	31%	48%	35%	26.02%	

Source: 2010 U.S. Census Data

Table 3.1 Geographic Distribution of Residential Real Estate Loans in the Dayton MSA 2017									
Census Tract Income Level	Census Tract Income Level % Total 1-4 Family Loans Aggregate % % of AA Owner Occupied Housing								
Low	0%	0.0%	0%						
Moderate	0%	10.3%	11.75%						
Middle	40%	61.8%	62.80%						
Upper	60%	27.9%	25.45%						

Source: 2015 ACS U.S. Census Data

Table 3A Geographic Distribution of Loans to Businesses in Dayton MSA 2015-16									
Census Tract Income Level	Low		Mode	Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	, , , , ,	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	
Commercial RE	2.5%	5%	15%	45%	60%	30%	22.5%	20%	

Source: Loan sample; Dun and Bradstreet data; 2010 US Census.

Table 3A.1 Geographic Distribution of Loans to Businesses in Dayton MSA 2017								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	,	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Commercial RE	0%	0%	15%	10%	62.5%	45%	22.5%	45%

Loan sample; Dun and Bradstreet data; 2015 ACS US Census.

Responses to Complaints

Monroe Federal has not received any complaints about its performance in helping meet AA credit needs during this evaluation period.





Appendix A: Scope of Evaluation

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 metropolitan and nonmetropolitan areas that received comprehensive evaluation review (designated by the term "full-scope") and those that received a less comprehensive review (designated by the term "limited-scope").

Time Period Reviewed Financial Institution	Lending Test (exclude Investment and Service CD Loans: Not Applica	able		
Financial institution		Products Reviewed		
Monroe Federal Savings and Loan Tipp City, Ohio	Association (Monroe)	Residential and Commercial Real Estate		
Affiliate(s)	Affiliate Relationship	Products Reviewed		
None Reviewed				
List of Assessment Areas and Ty	pe of Evaluation			
Assessment Area	Type of Exam	Other Information		
Dayton MSA	Full-Scope			

Appendix B: Community Profiles for Full-Scope Areas

DAYTON MSA AA

Demographic Information for Full-Scope Area: Dayton MSA AA (2015/2016)									
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #			
Geographies (Census Tracts/BNAs)	38	2.5	15.0	60.0	22.5	0.0			
Population by Geography	194,359	3.4	11.8	60.7	24.1	0.0			
Owner-Occupied Housing by Geography	56,474	2.5	10.4	61.1	26.0	0.0			
Businesses by Geography	10,448	3.0	18.1	55.9	23.0	0.0			
Farms by Geography	422	3.3	8.3	66.4	22.0	0.0			
Family Distribution by Income Level	53,372	17.5	18.3	23.1	41.1	0.0			
Distribution of Low- and Moderate- Income Families throughout AA Geographies	19,091	6.2	17.1	61.6	15.1	0.0			
Median Family Income HUD Adjusted Median Family Income for 2016 Households Below the Poverty Level	= \$60,009 = \$60,800 = 7.1%	Median I Unemplo	= \$131,511 = 4.75%						

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

Demographic Information for Full-Scope Area: Dayton MSA AA (2017)									
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #			
Geographies (Census Tracts/BNAs)	40	0.0	15.00	62.5	22.5	0.0			
Population by Geography	194,487	0.0	14.5	61.9	23.6	0.0			
Owner-Occupied Housing by Geography	54,788	0.0	11.7	62.8	25.5	0.0			
Businesses by Geography	10,808	0.00	14.8	62.2	23.0	0.0			
Farms by Geography	441	0.0	8.8	68.7	22.5	0.0			
Family Distribution by Income Level	52,888	18.9	18.4	20.2	42.5	0.00			
Distribution of Low- and Moderate- Income Families throughout AA Geographies	19,739	0	24.5	60.5	15.0	0.00			
Median Family Income HUD Adjusted Median Family Income for 2017 Households Below the Poverty Level	= \$61,957 = \$63,600 = 9.1%	Median I Unemplo	= \$125,550 = 4.97%						

Source: 2015 ACS Census, and 2017 D&B Data

Monroe has designated one AA in the Dayton Metropolitan Statistical Area (MSA). In 2015 and 2016 the thrift had 12 census tracts (CTs) in the southern portion of Miami County and 27 CTs in the northern half of Montgomery County. Of the 38 CTs in 2015-16, 2.5 percent were low-income, 15 percent were moderate-income, 60 percent were middle-income, and 22.5 percent were upper-income.

This AA consists of 13 CTs in the southern portion of Miami County and 27 CTs in the northern half of Montgomery County. Of the 40 CTs in 2017, none were low-income, 15 percent were moderate-income, 62.5 percent were middle-income, and 22.5 percent were upper-income. This is a slight change from 2015-16 where they had two CTs split. This increased their number of CTs from 38 to 40 but their AA did not grow or change in any way. They did lose the one low income census tract during this split as it changed to a moderate income tract and the moderate income tract that split was changed to a middle income tract. These changes were due to the results of the 2015 ACS.

Competition in these counties is strong. Monroe holds approximately 0.86 percent of all the deposits within the two counties included in the Dayton MSA AA. This ranks 13th of 25 total financial institutions within the county, according to the June 30, 2017, FDIC market share report.

The economic condition in the AA has improved since the prior CRA evaluation period. The combined average unemployment rate for the two counties within the Dayton MSA AA was 4.9 percent over the evaluation period. This is slightly higher than the current State of Ohio average rate of 4.5 percent, and the current national average rate of 4.1

percent, per the Bureau of Labor Statistics. Major industries in the AA include construction, retail trade, and manufacturing. Major employers include Wright-Patterson Air Force Base, Premier Health Partners, Kettering Health Network, The Kroger Company, and LexisNexis.

We contacted a small business/economic development organization during the evaluation period. The community contact indicated financial institutions are adequately meeting the community credit needs of small businesses and individuals of all income levels. Additionally, the thrift gives back to the local youth by providing financial classes to the local high schools.