

PUBLIC DISCLOSURE

May 7, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Minster Bank
RSSD #604024

95 West 4th Street
Minster, Ohio

Federal Reserve Bank of Cleveland

P.O. Box 6387
Cleveland, Ohio 44101-1387

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

Institution Rating

a. Overall Rating	1
b. Scope of Examination	2
c. Description of Institution	4
d. Description of Assessment Area	6
e. Conclusions with Respect to Performance Tests	7

Non-metropolitan Ohio Area (reviewed using full-scope review)

a. Description of Institution's Operations	10
b. Conclusions with Respect to Performance Tests	17

Dayton Metropolitan Statistical Area 19380 (reviewed using limited scope review)

a. Description of Institution's Operations	24
b. Conclusions with Respect to Performance Tests	26

Appendices

a. Assessment Area Map.....	27
b. Glossary of Terms.....	28

INSTITUTION'S CRA RATING: SATISFACTORY

The Lending Test is rated "Satisfactory"

The Community Development Test is rated "Satisfactory"

The major factors and criteria contributing to this rating include:

- A reasonable loan-to-deposit ratio, given the bank's size, financial condition, and assessment area credit needs;
- A substantial majority of loans and other lending-related activities are in the assessment area;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area;
- A reasonable penetration among individuals of different income levels (including low- and moderate-income individuals) and businesses of different revenue sizes;
- An adequate responsiveness to the community development needs of its assessment area; and,
- There were no CRA-related complaints filed against the bank since the previous Community Reinvestment Act (CRA) examination.

The bank was rated "Satisfactory" at the previous CRA evaluation dated March 17, 2008.

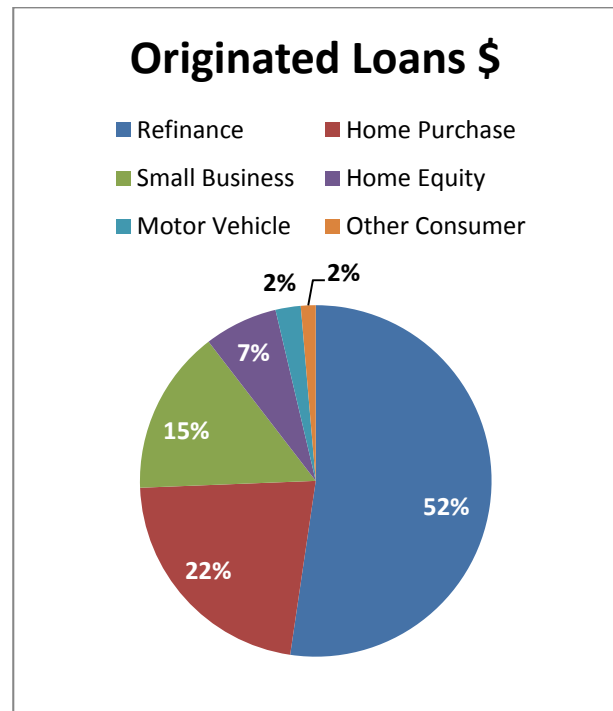
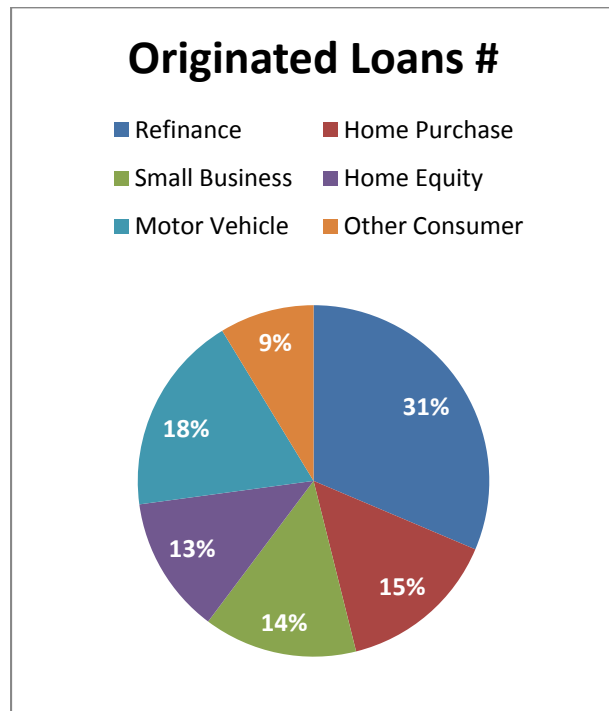
SCOPE OF EXAMINATION

Minster Bank’s CRA performance covers the period from January 1, 2010 through December 31, 2011 for lending and the period from March 17, 2008 through May 7, 2012 for community development activities.

The following loan products were evaluated under the lending test: small business loans; home refinance and home purchase loans, collectively titled as Home Mortgage Disclosure Act (HMDA) loans; and consumer loans. For this evaluation, consumer loans consisted of home equity, motor vehicle, and other consumer loans. There were not enough small farm, home improvement, or multi-family housing loans during this review period to conduct a meaningful analysis; therefore, they were not considered during this evaluation.

The following table and charts illustrate the volume and distribution of loans originated during the evaluation period:

Loan Type	Number of Loans	Dollar Amount of Loans \$ (000)
Refinance	415	\$62,028
Home Purchase	195	\$26,144
Small Business	187	\$18,001
Home Equity	167	\$8,014
Motor Vehicle	244	\$2,758
Other Consumer	115	\$1,606
Total Loans	1,323	\$118,551



Given the above distribution, HMDA loans (refinance and home purchase loans) received the greatest weight in this analysis based on number of loans and dollar volume. Primarily based on dollar volume, the next greatest weight was given to small business loans and consumer loans received the least weight.

Due to the relatively low number of moderate tracts and the absence of any low income tracts, borrower distribution was given greater weight than geographic distribution for this evaluation.

In the non-metropolitan area, there was sufficient volume to evaluate the bank's lending; therefore, a full scope evaluation was completed. For the Dayton MSA, which only includes Miami County, a limited scope evaluation was conducted to ensure consistency within this assessment area.

DESCRIPTION OF INSTITUTION

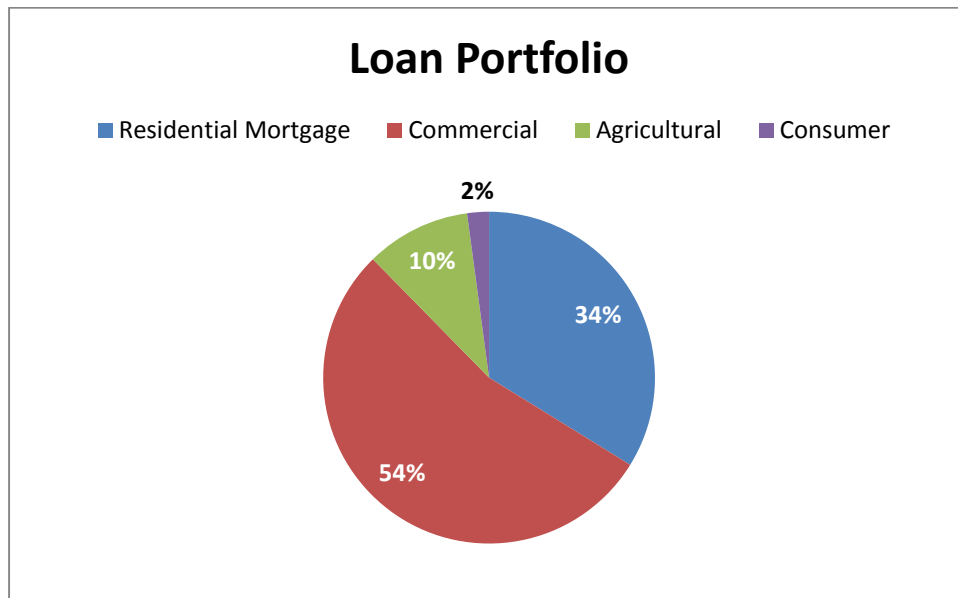
Minster Bank (Minster) is a state member bank and the sole subsidiary of Minster Financial Corporation, a financial holding company, headquartered in Minster, Ohio. There are no other subsidiaries under the holding company of the bank.

As of December 31, 2011, Minster had total assets of \$328 million, of which \$185 million (56.3%) represents loans and \$124 million (37.7%) represents investments. Total assets have grown from \$258 million, an increase of 27.0% since December 31, 2007.

Minster is a full-service retail bank within the State of Ohio, serving the entirety of Auglaize, Mercer, Miami, Shelby, and Darke Counties. The bank's main office is in the city of Minster, which is located in Auglaize County. In addition to the main office, the bank operates six full-service branch offices. Four of the branch offices are also located in Auglaize County in the cities of Minster, New Bremen, St. Marys, and Wapakoneta. The fifth branch office is located in Shelby County in the city of Sidney and the sixth branch office is located in the city of Troy in Miami County, which is part of the Dayton MSA. All of the branch offices, including the main office, have 24-hour, full-service ATMs. Since the previous examination, Minster opened a loan production office in Vandalia, Ohio.

Minster is a full-service retail bank offering deposit accounts and consumer, real estate, and commercial loans. As of December 31, 2011, the loan portfolio totaled \$185 million. While the concentration levels have remained consistent for real estate loans since the previous evaluation, loans for commercial real estate increased by 20.2% and loans to individuals decreased by 36.8%. Agricultural loans also decreased by 5.2% during the same period.

Loans constitute approximately 56.3% of total assets, with real estate loans accounting for approximately 81.1% of the loan portfolio. The following chart demonstrates the bank's loan portfolio composition as of December 31, 2011.



Minster's investment portfolio as of December 31, 2011 was \$123.7 million, which represents 37.7% of total assets. Investments in interest bearing bank balances account for 43.7%, municipal securities account for 30.3%, U.S. Treasuries and Agencies account for 24.7% of all investments, while all other securities and federal funds sold comprise the remaining 1.3% of the bank's total investments.

The bank's performance under CRA was evaluated in terms of the demographic and business context in which the bank operates. The bank's asset size and financial condition indicate that it has the ability to continue to effectively meet the credit needs of its assessment area. There are no legal or other impediments hampering the bank's ability to meet the community's credit needs.

DESCRIPTION OF ASSESSMENT AREA

Minster's footprint covers five counties in the following two assessment areas within the State of Ohio:

- Non-metropolitan Ohio Area, comprised of the entireties of Auglaize, Darke, Mercer, and Shelby Counties
- Dayton Metropolitan Statistical Area 19380, comprised of the entirety of Miami County

In total, both assessment areas are comprised of 61 census tracts, none of which are distressed or underserved. There are no low-income tracts, four moderate-income tracts, 43 middle-income tracts, and 14 upper-income tracts. The majority of the census tracts are located in the non-metropolitan assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Loan-to-Deposit Ratio

A financial institution's loan-to-deposit (LTD) ratio compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution's lending volume relative to its capacity to lend and is derived by adding the quarterly loan-to-deposit ratios and dividing the total by the numbers of quarters. Minster's peer group¹ consists of similarly situated institutions.

The following table illustrates Minster's quarterly loan-to-deposit ratios for 16 quarters since the previous evaluation, along with the average loan-to-deposit ratio for the same period for the bank and the peer.

Loan-to-Deposit Ratios							
MINSTER BK					GREENVILLE NB	FIRST NB	PEOPLES BK CO
As of Date	Net Loans \$(000s)	Total Deposits \$(000s)	Bank Ratio	Aggregate Ratio	Peer 1 Ratio	Peer 2 Ratio	Peer 3 Ratio
December 31, 2011	184,609	280,390	65.84	75.10	79.78	49.51	58.82
September 30, 2011	180,655	280,662	64.37	75.90	78.35	49.10	58.96
June 30, 2011	178,891	273,546	65.40	76.64	78.34	51.94	59.40
March 31, 2011	179,096	275,266	65.06	76.48	79.07	52.56	60.19
December 31, 2010	183,047	272,405	67.20	78.86	81.91	52.30	60.17
September 30, 2010	183,233	265,956	68.90	79.69	80.25	52.60	62.05
June 30, 2010	181,718	268,357	67.72	77.17	82.96	52.43	64.21
March 31, 2010	180,507	266,075	67.84	76.44	81.21	53.30	64.84
December 31, 2009	180,981	254,941	70.99	77.62	83.03	54.14	65.53
September 30, 2009	179,076	238,831	74.98	79.81	84.65	57.94	63.40
June 30, 2009	179,214	244,995	73.15	80.14	84.65	59.13	63.33
March 31, 2009	176,655	247,276	71.44	79.35	87.66	60.59	64.58
December 31, 2008	179,377	252,513	71.04	82.01	90.07	64.11	66.11
September 30, 2008	169,656	247,718	68.49	82.90	90.78	62.17	65.93
June 30, 2008	165,515	244,443	67.71	81.28	92.92	61.14	64.35
March 31, 2008	165,146	246,427	67.02	79.60	92.48	62.44	66.95
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation			68.57	78.69	84.26	55.96	63.05

The bank averaged a 68.6% LTD over the past 16 quarters. The bank's average LTD ratio is lower than the aggregate LTD ratio of 78.7%. Bank management attributes the lowering LTD ratio to economic conditions and the bank's conservative lending philosophy. Management has seen individuals and businesses overall reducing debt given the current economic conditions.

¹ Minster's national peer group consists of all commercial banks having assets between \$300 million and \$1 billion.

Minster’s LTD ratio was compared to the following local peer banks: Greenville National Bank (Greenville), Peoples Bank Coldwater (Peoples), and First National Bank (First National) in New Bremen. These banks were selected as local peers because of the similar number of offices inside Minster’s market area and asset size. Greenville has seven offices and 6.5% of the deposit market share, Peoples Bank has seven offices and a 6.8% market share, and First National has seven offices and a 4.1% market share.

Considering the bank’s lending-related activity, size, financial condition, and assessment area credit needs, Minster’s LTD ratio is considered reasonable.

Lending in the Assessment Area

The bank’s small business lending, mortgage lending, and consumer lending was analyzed to determine the volume of lending inside and outside the bank’s assessment area. Of the bank’s total loans, 95.0% by volume and 94.3% by dollar amount were made inside the assessment area.

The following table illustrates the percentage of loans made inside and outside the bank’s assessment area.

Lending Inside and Outside the Assessment Area								
Loan Type	Inside the Assessment Area				Outside the Assessment Area			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Total Small Business	170	90.0	15,562	86.5	17	9.1	2,439	13.5
Home Equity	166	99.4	7,914	98.8	1	0.6	100	1.2
Motor Vehicle	228	93.4	2,591	94.0	16	6.6	167	6.0
Consumer	108	93.9	1,472	91.6	7	6.1	135	8.4
Total Consumer	502	95.4	11,977	96.8	24	4.6	402	3.2
Home Purchase	181	92.8	24,294	92.9	14	7.2	1,850	7.1
Home Improvement	23	95.8	1,632	66.4	1	4.2	825	33.6
Multi-Family Housing	5	100.0	1,389	100.0	0	0.0	0	0.0
Refinancing	404	97.3	60,562	97.6	11	1,466	2.4	415
Total HMDA	613	95.9	87,877	95.5	26	4.1	4,141	4.5
Total Loans	1,285	95.0	115,416	94.3	67	5.0	6,981	5.7

A substantial majority of the bank’s loans by both volume and dollar amount were made inside its assessment area.

Geographic Distribution of Lending

Minster’s geographic distribution of lending throughout the assessment area is considered reasonable. The respective analysis can be found within each assessment area discussion later in this report.

Borrower Distribution of Lending

Minster's lending to borrowers of different income categories and lending to businesses of different revenue sizes is considered reasonable. This reflects the bank's performance in all assessment areas in comparison to the demographic data. The respective analysis can be found within each assessment area discussion later in this report.

Response to Consumer Complaints

The bank has not received any CRA-related complaints since the previous examination.

Community Development Test

Minster is rated "Satisfactory" under the community development test.

Minster's community development performance demonstrates an adequate responsiveness to the community development needs of the assessment area through community development loans, qualified investments, and community development services, considering its capacity and the needs and availability of such opportunities for community development in its assessment area.

During this evaluation period, Minster originated one community development loan in the amount of \$480,000. The bank also made a total of two qualified investments totaling \$10,000 during the evaluation period. Given the limited number of investment opportunities in the assessment areas, this was considered adequate.

In addition, bank employees routinely provide financial expertise to four organizations that provide community development services within the assessment area. These activities represent an adequate level of qualified services.

Specific details of community development activities are discussed in the respective assessment area sections.

Fair Lending Or Other Illegal Credit Practices Review

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

NON-METROPOLITAN ASSESSMENT AREA
(Full-scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
NON-METROPOLITAN OHIO AREA**

The non-metropolitan Ohio assessment area consists of the entireties of Auglaize, Darke, Mercer, and Shelby Counties. This assessment area is comprised of 41 total census tracts, of which there are no low-income, one (2.4%) moderate-income, 29 (70.7%) middle-income, and 11 (26.8%) upper-income tracts.

There is a high level of competition within this assessment area. There are 23 FDIC-insured institutions operating 97 offices within Auglaize, Darke, Mercer, and Shelby Counties. As of June 30, 2011, Minster has a 7.44% market share of deposits within these counties, which ranks seventh among institutions in this market. U.S. Bank ranked first with a 10.27% market share of deposits, followed by First Financial Bank, which had a 9.59% market share.

Population Characteristics

According to 2000 U.S. Census Data, the total population within Minster's non-metropolitan Ohio assessment area is 188,754. The majority of the population (70.73%) lives in middle-income census tracts, while 26.83% of the population lives in upper-income census tracts. Only 2.44% of the population lives in moderate-income census tracts.

According to 2010 Census Data, the population within each of the counties in the assessment area has remained relatively stable. The following chart shows the population change from 2000 to 2010 by county.²

County	2000	2010
Auglaize	46,611	45,949
Darke	53,309	52,959
Mercer	40,924	40,814
Shelby	47,910	49,423

As the table indicates, Darke County is the most populous county in the assessment area with 52,959 residents. Darke County is made up of 20 townships and Greenville, its largest town, has a population of 13,294. Greenville is also the county seat and is located just 38 miles from Dayton, Ohio.

Shelby County's population is 49,423. The Shelby County seat is located in the city of Sydney, which is also the county's largest city. Interstate 75 bisects Shelby County from North to South. Shelby County is made up of 14 townships.

² <http://quickfacts.census.gov/qfd/states/39000.html>

The Auglaize County seat is located in the county’s largest city, Wapakoneta. Other towns and cities in the county include St. Mary’s, New Bremen, and Minster. The county is made up of 14 townships and the population of Auglaize County is 45,949.

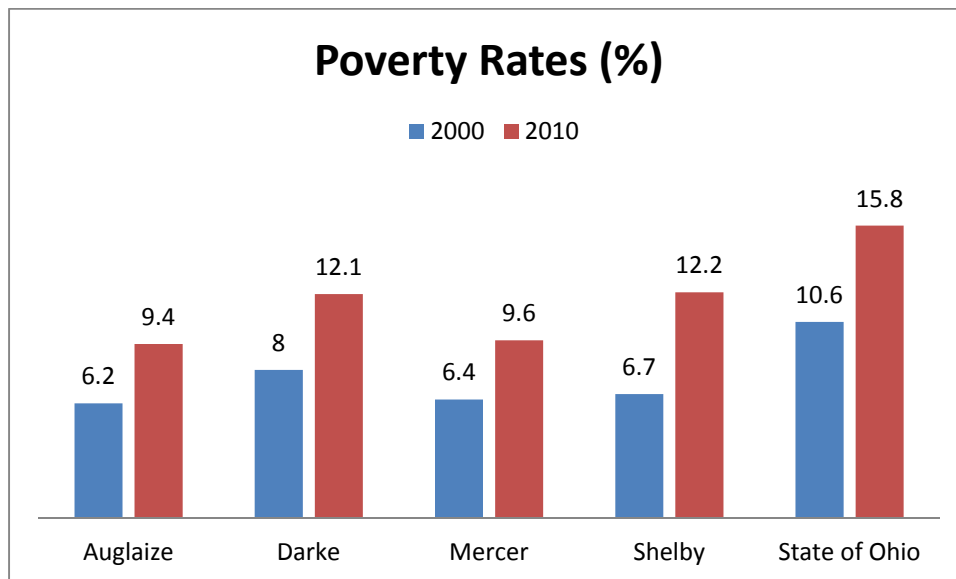
Mercer County has a population of 40,814 and its largest city and county seat is Celina. Mercer County is home to the Grand Lake, a 13,500 acre lake bordered by Celina and Montezuma in Mercer County and St. Mary’s in Auglaize County.

Income Characteristics

Based on 2000 U.S. Census data, the median family income for the bank’s non-metropolitan assessment area is \$49,225, which is below the Ohio median family income of \$50,037.

There are 70,275 households, of which 52,057 (74.1%) are families. Approximately 5.3% of families are below the poverty level, which is lower than the statewide family poverty rate of 7.8%. In addition, 5.8% of families who live below the poverty level reside in moderate-income census tracts. The majority of families below the poverty level (66.6%) live in middle-income census tracts and 13.9% of families below the poverty level reside in upper-income tracts.

The following chart, based on data from the Economic Research Service of the United States Department of Agriculture (USDA), shows the 2010 poverty rates as compared to the 2000 household poverty rates.³



³ <http://www.ers.usda.gov/data/povertyrates/>

Further, of households receiving public assistance, 5.8% are in moderate-income tracts and the majority (82.4%) is concentrated in middle-income tracts. Of the renters with a rent cost greater than 30.0% of their income, 5.7% and 77.1% reside in moderate- and middle-income tracts, respectively.

Housing Characteristics

According to 2000 U.S. Census data, there are 74,610 total housing units in the assessment area. Approximately 72.6% of the units are owner-occupied and approximately 21.5% are rental units. One-to-four family units account for 95.3% of the housing units. Of the total housing units, 53.6% are owner-occupied units in moderate-income tracts, 71.2% are owner-occupied units in middle-income tracts, and 78.3% are owner-occupied units in upper-income tracts. Overall, the owner-occupancy rate in the assessment area is higher than the state of Ohio's at 64.2%.

The median age of the housing stock is 40 years, with the oldest housing stock in moderate-income tracts (59 years). The median age of the housing stock in middle- and upper-income tracts is significantly lower at 40 and 35 years, respectively. The age of the housing stock for these areas indicates an opportunity for home improvement-type lending.

The median housing value in the assessment area is \$94,197, with an affordability ratio of 45.0%. The higher the affordability ratio, the more affordable a home is considered. The housing affordability ratio is calculated by dividing median family income by median housing value. The housing stock in the assessment area is slightly more affordable than the state of Ohio as a whole (41.0%). The most affordable housing is located in Auglaize County, with an affordability ratio of 47.0%, followed by Mercer at 46.0%. Darke and Shelby counties have the least affordable housing with affordability ratios of 42.0% and 45.0%, respectively.

According to RealtyTrac, an online real estate marketplace and data company that tracks foreclosure statistics among other data, foreclosure filings were reported in 8,421 Ohio properties in March 2012. While Ohio's rate has recently stabilized, Ohio still had the nation's ninth-highest overall foreclosure rate. One in every 609 Ohio households received a foreclosure notice in March 2012.

The counties within the assessment area experienced lower foreclosure rates than the State of Ohio on average. The following table shows the number of foreclosures and foreclosure rates by county in the assessment areas in March 2012.⁴

⁴ www.realtytrac.com

County	Number of Foreclosures	Housing Units Received a Foreclosure Filing ⁵
Shelby	23	1 in 877
Darke	12	1 in 1,894
Auglaize	10	1 in 1,959
Mercer	5	1 in 3,527

From a rental perspective, the median gross rent is \$462, with nearly 52.6% of rents being less than \$500 per month. Approximately 7.4% of rental units had rents greater than \$700 per month. Additionally, 26.1% of renters have rental costs greater than 30.0% of their income. This figure indicates that rents are slightly more affordable for low- and moderate-income borrowers in the assessment area compared to the State of Ohio, where 33.8% of renters have rental costs greater than 30.0% of their income.

Labor, Employment, and Economic Characteristics

The major employers and corresponding salary information for each counties in the assessment areas is based on 2010 statistics obtained from the Ohio Department of Development.⁶

For Auglaize County, the largest industries by average employment are manufacturing; trade, transportation, and utilities; education and health services; local government; and leisure and hospitality. The largest industries by corresponding average weekly corresponding salaries are manufacturing (\$946); state government (\$922); federal government (\$899); construction (\$737); natural resources and mining (\$687). Some of the major employers in this county are Crown Equipment, Dannon Company, Joint Township District Memorial Hospital, Hitachi Metals, and Setex.

For Darke County, the largest industries by average employment are manufacturing; trade, transportation, and utilities; professional and business services; local government; and education and health services. The largest industries by average weekly corresponding salaries are federal government (\$844); state government (\$815); manufacturing (\$764); construction (\$724); and financial services (\$719). Some of the major employers in this county are Greenville City Schools, Honeywell International, Midmark Corporation, Moriroku Company/Greenville Technology, and Whirlpool Corporation/KitchenAid.

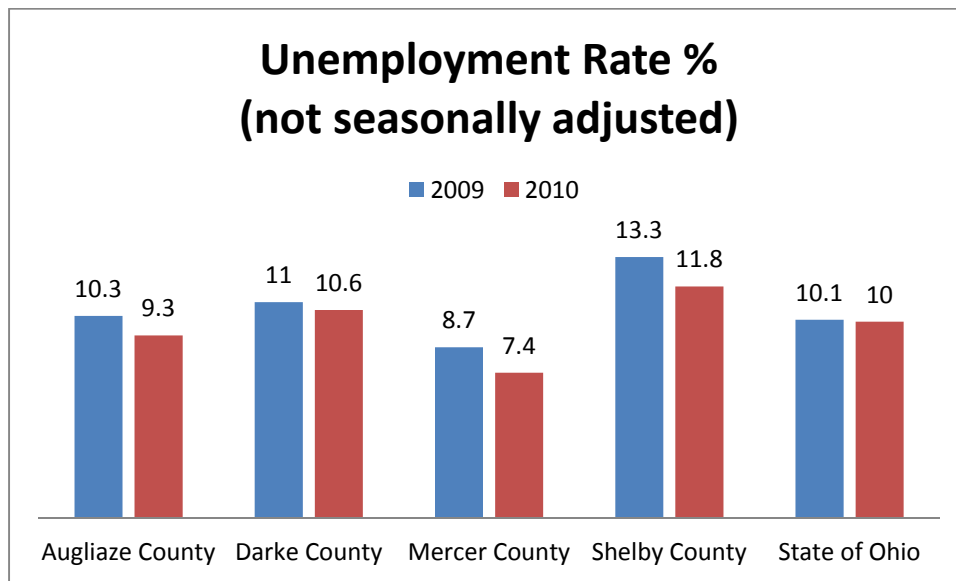
⁵ The foreclosure rate is calculated by dividing the total housing units in the county by the total number of properties that received foreclosure filings during the month and that number is expressed as a ratio. The lower the second number in the ratio, the higher the foreclosure rate.

⁶ <http://development.ohio.gov/research>

For Mercer County, the largest industries by average employment are manufacturing; trade, transportation, and utilities; local government; leisure and hospitality; and professional and business services. The largest industries by average weekly corresponding salaries are federal government (\$801); construction (\$765); manufacturing (\$743); state government (\$732); and financial services (\$700). Some of the major employers in this county are Celina Aluminum Precision Technologies, Celina City Schools, Mercer Health, Reynolda & Reynolds, and Crown Equipment.

For Shelby County, the largest industries by average employment are manufacturing; trade, transportation, and utilities; local government; professional and business services; and education and health services. The largest industries by average weekly corresponding salaries are state government (\$1,000); information (\$982); manufacturing (\$966); construction (\$883); and federal government (\$864). Some of the major employers in this county are Honda Motor Company, Shelby County Government, Superior Metal Products, Wilson Memorial Hospital, and Thor Industries / Airstream.

The following table outlines the unadjusted unemployment rate of the assessment area, according to the Ohio Department of Job and Family Services.⁷



The chart indicates that the unemployment rates in Shelby and Darke Counties were slightly higher than the statewide unemployment rates, while unemployment rates in Auglaize and Mercer Counties have been consistent with or slightly lower than statewide unemployment rates.

⁷ <http://ohiolmi.com>

Community Contact

One community contact was conducted in order to provide additional information regarding the assessment area. The community contact provided context to the demographic and economic characteristics discussed below.

The economic development contact located in Auglaize County noted the positive relationship between the local business community and banks. Credit needs in the area are generally being met by the banks and the local banks are very good corporate citizens. The contact identified the possible need for more small business lending related to banking requirements for longer-term credit history in the case of some start-up businesses. Overall, economic growth in the area is strong, unemployment appears to be going down, and future prospects are positive. The contact specifically mentioned Minster and additional community banks in the area providing valuable support to the community in credit products and community activism.

The following chart illustrates the demographics of the non-metropolitan Ohio assessment area.

Combined Demographics Report

Assessment Area(s): Non Metro Ohio AA 2011

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	6,555	12.6
Moderate-income	1	2.4	1,086	2.1	189	17.4	8,413	16.2
Middle-income	29	70.7	36,472	70.1	2,185	6.0	13,251	25.5
Upper-income	11	26.8	14,499	27.9	361	2.5	23,838	45.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	41	100.0	52,057	100.0	2,735	5.3	52,057	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	1,989	1,066	2.0	53.6	769	38.7	154	7.7
Middle-income	53,114	37,795	69.8	71.2	11,915	22.4	3,404	6.4
Upper-income	19,507	15,275	28.2	78.3	3,367	17.3	865	4.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	74,610	54,136	100.0	72.6	16,051	21.5	4,423	5.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	248	3.0	216	2.9	18	3.6	14	3.4
Middle-income	5,876	70.0	5,275	70.5	320	63.6	281	69.2
Upper-income	2,267	27.0	1,991	26.6	165	32.8	111	27.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8,391	100.0	7,482	100.0	503	100.0	406	100.0
Percentage of Total Businesses:				89.2		6.0		4.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3	0.2	3	0.2	0	0.0	0	0.0
Middle-income	1,188	69.2	1,180	69.2	6	85.7	2	50.0
Upper-income	526	30.6	523	30.7	1	14.3	2	50.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,717	100.0	1,706	100.0	7	100.0	4	100.0
Percentage of Total Farms:				99.4		.4		.2

Based on 2010 D&B information according to 2000 Census Boundaries.

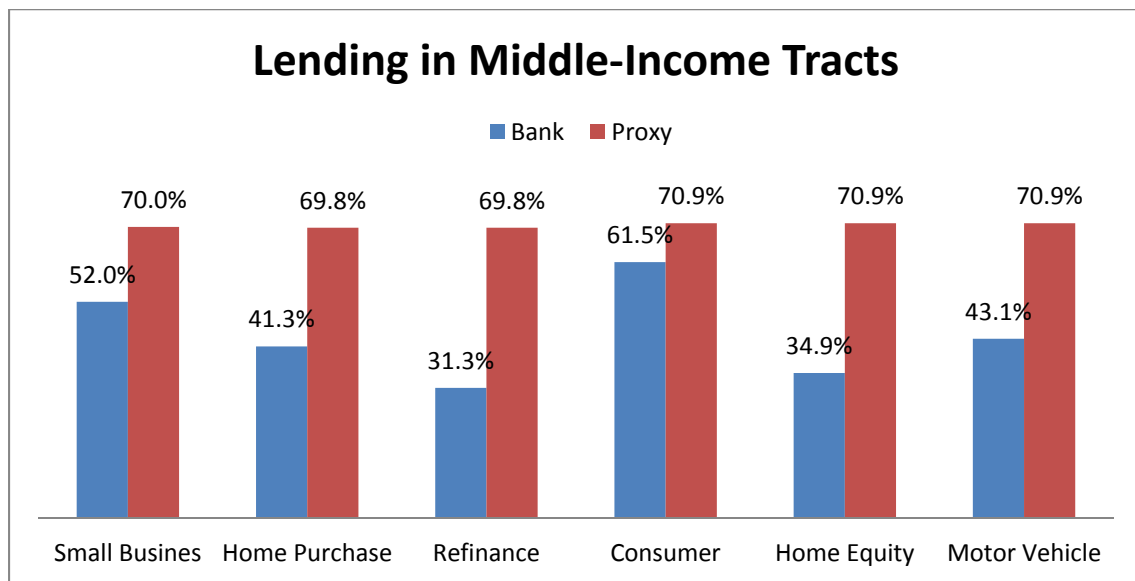
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTING IN NON-METROPOLITAN OHIO

Lending Test

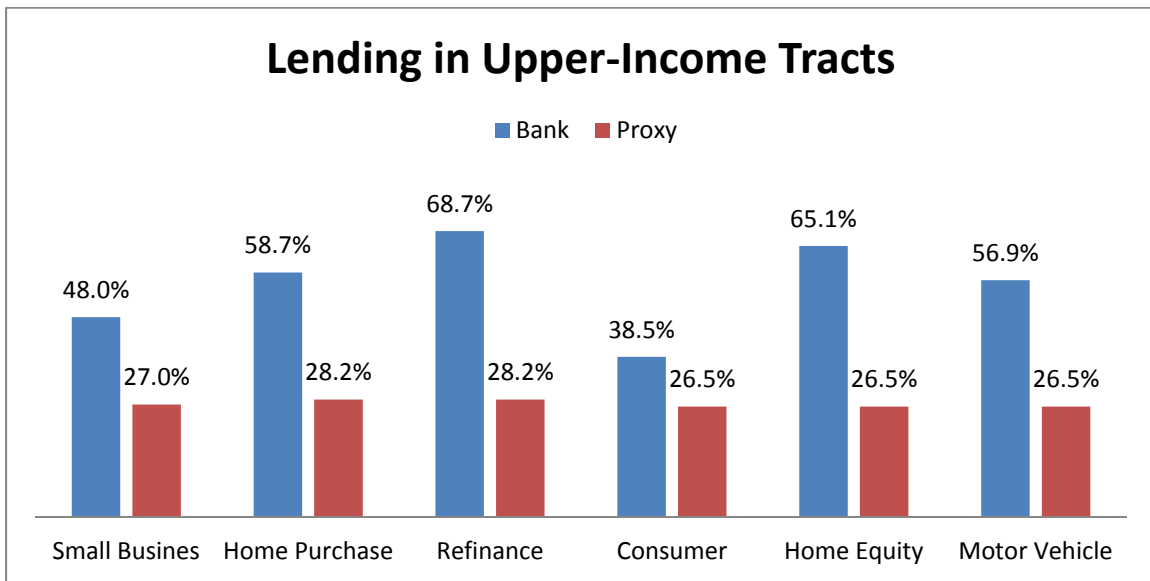
Geographic Distribution of Lending

The bank's geographic distribution of lending reflects a poor dispersion of loans to the one moderate income tract within this assessment area. Of the 1,072 loans originated during the review period, none of the loans were made in the moderate-income geography. However, the one moderate-income geography comprised only 2.4% of Minster's total assessment area and contained only 2% of owner-occupied housing and 3% of businesses. By comparison, 41.0% of loans were made in middle-income geographies and 59.0% were made in upper-income geographies. Middle- and upper-income geographies represent 70.7% and 26.8%, respectively, of the total assessment area.

As noted above, Minster did not make a loan in its one moderate income tract and made loans in 23 out of 29 of its middle-income tracts for a penetration rate of 79.3%. Minster also made loans in ten out of 11 of its upper-income tracts for a penetration rate of 90.9% and penetrated 80.5% of its geographies overall.



The chart above shows that in middle-income tracts, Minster originated a lower percentage for all loans compared to the percentage of owner-occupied housing units, households, and businesses in middle-income tracts. Performance is strongest in consumer and small business loans and is overall considered adequate.



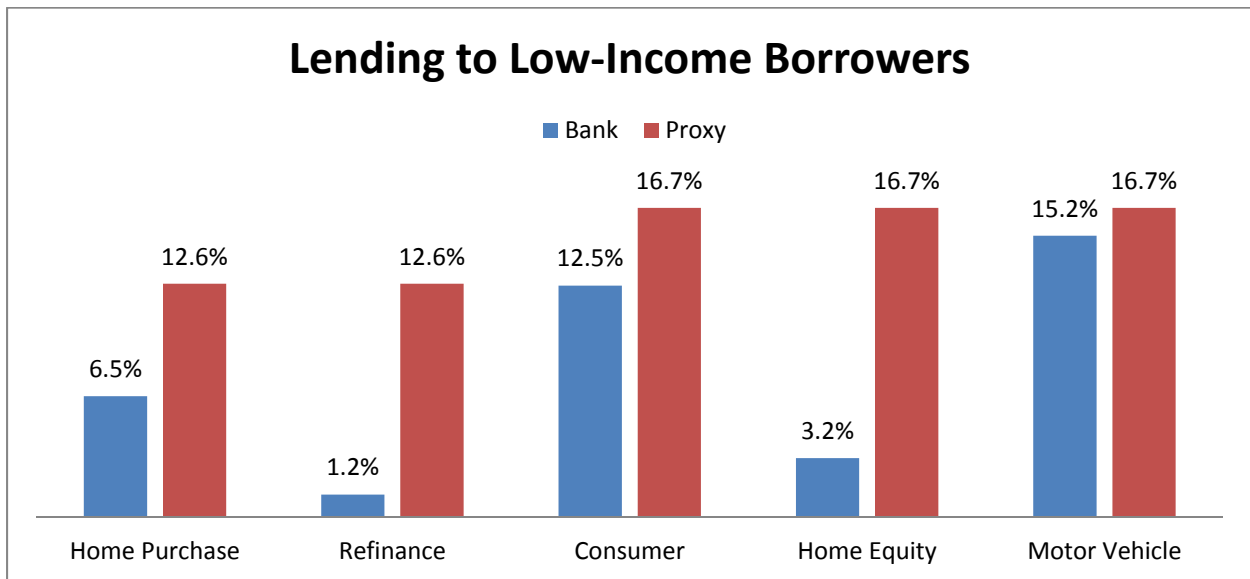
The chart above shows that Minster originated a substantially greater percentage of loans than the proxies for all loan product types in upper-income tracts.

Although performance in the one moderate-income tract was poor, given the limited owner-occupied units and businesses located in the tract more weight was given to performance in the remaining tracts in the assessment area. While lending to middle-income tracts also fell below demographic proxies, overall performance was considered reasonable.

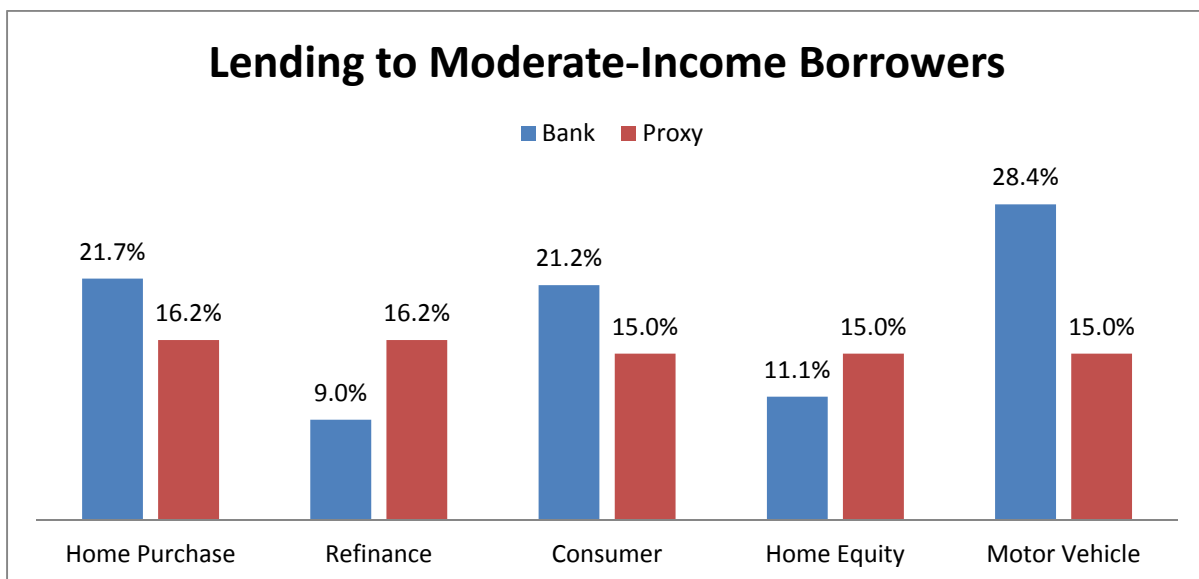
Borrower Distribution of Lending

Minster's lending performance reflects a reasonable distribution of lending to borrowers of different income levels and a reasonable level of lending to businesses of different revenue sizes (particularly to low- and moderate-income borrowers and small businesses) in this assessment area.

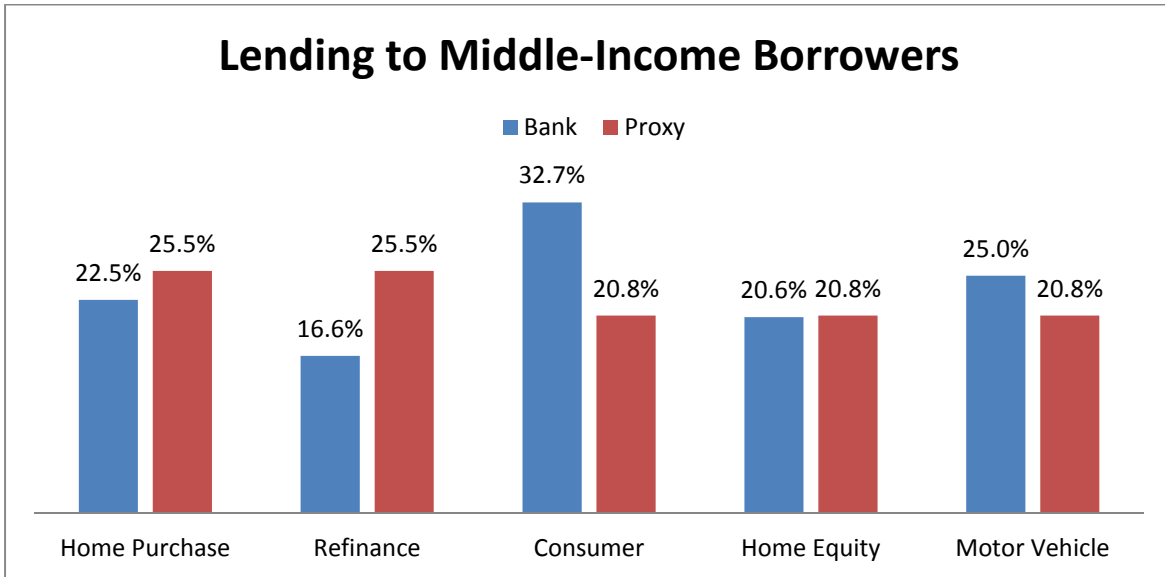
As previously discussed, the bank's borrower distribution was weighted more heavily than geographic distribution.



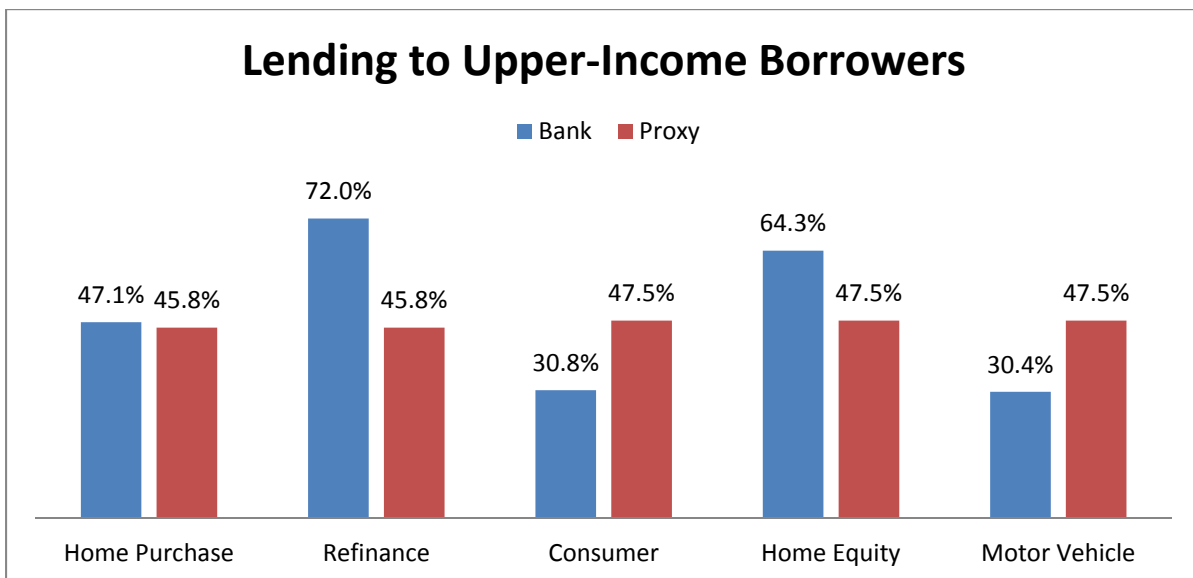
Lending to low-income borrowers in the chart above indicates that Minster originated a lower percentage of home purchase loans compared to the percentage of low-income families in the assessment area and a substantially lower percentage for refinance and home equity loans. For consumer-type loans, Minster originated a closer percentage for both motor vehicle and other consumer loans compared to the percentage of low-income households in the assessment area.



Lending to moderate-income borrowers in the chart above indicates that Minster originated a lower percentage of home equity and refinance loans compared to the proxy and a substantially greater percentage for home purchase loans. For consumer-type loans, Minster originated a greater percentage for both motor vehicle and other consumer loans compared to the proxy.



The chart above shows that in regards to lending to middle-income borrowers, Minster originated a lower percentage of home purchase and refinance loans compared to the proxy. For consumer-type loans, Minster originated a substantially higher percentage for both motor vehicle and consumer loans compared to the percentage of households and were in line with the proxy on home equity loans.



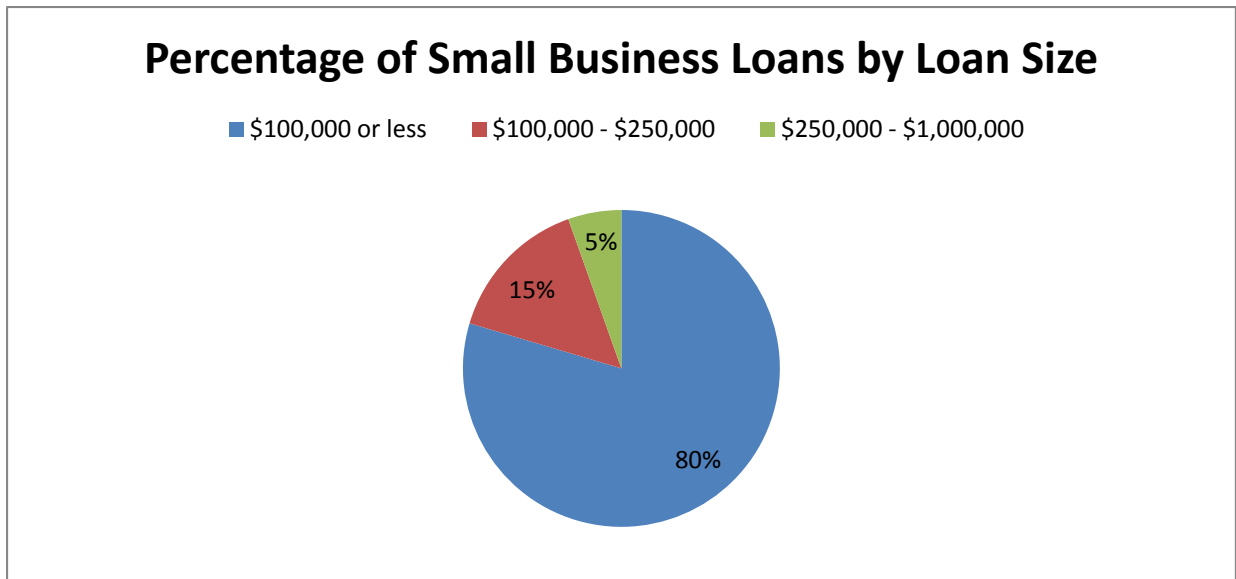
The chart above shows that with regard to lending to upper-income borrowers, Minster exceeded the proxy for home purchase and refinance loans. Minster also exceeded proxy for home equity loans, however, was substantially below the proxy for both motor vehicle and other consumer loans.

For this assessment area, 28.7% of the population is comprised of low- and moderate-income families and 5.3% of the families are at the poverty level. Calculations reveal that only 30.4% of the available housing stock is affordable for low-income families and 62.2% is affordable for moderate-income families. Based on these factors, the bank demonstrated a reasonable level of home purchase lending for the low and moderate income families.

The bank also had excellent levels of lending to low- and moderate-income borrowers for both motor vehicle and consumer loans.

According to 2011 business demographic data, this assessment area has 8,391 businesses, 89.2% of which are small businesses. During this evaluation period, Minster originated 148 small business loans, aggregating \$13.3 million.

The bank originated 90.5% of its small business loans to businesses with \$1 million or less in revenue compared to 89.2% of these businesses within the assessment area. Therefore, the bank's lending to businesses with gross annual revenues of \$1 million or less is considered reasonable in this assessment area.



Further analysis shows that 79.6% of the bank's small business loans were extended in an amount of \$100,000 or less. Since smaller-size loans are generally commensurate with the borrowing needs of smaller businesses, Minster's lending activity demonstrates that the bank is adequately meeting the credit needs of such businesses.

Community Development Test

Minster’s community development in the non-metropolitan assessment area demonstrates an adequate responsiveness to the community development needs through qualified community development loans, investments, and services. Consideration was given to Minster’s capacity and the need and availability of community development opportunities.

Community Development Loans

Minster has demonstrated an adequate level of responsiveness to community development lending needs. Minster originated a \$480,000 qualified loan for an expansion project designed to provide various services to low and moderate income individuals and families in the St. Mary’s area. Given the limited community development lending opportunities in the area, this is considered reasonable.

Qualified Investments

Minster has demonstrated an adequate responsiveness to community development investment needs. During this evaluation period, the bank made one new investments of \$5,000 in this assessment area. The investment was a donation to support activities related to health care directed to low- and moderate-income individuals and families. Opportunities for investments within the bank’s assessment area are limited.

Community Development Services

The branch distribution is a poor indicator of services provided to the overall assessment area due to the lack of any low income tracts and only one moderate income tract. The bank does not have a branch or ATM in the moderate income tract.

In addition to the branch delivery system, Minster offers alternative delivery systems, such as ATMs, telephone, and internet banking.

Geography	Number of Branches	Percent	Number of ATMs (full service)	Percent	Percent of Families by Tract Income
Moderate-Income	0	0%	0	0%	2.1
Middle-Income	2	33.3%	2	33.3%	70.0%
Upper-Income	4	66.7%	4	66.7%	27.9%
Totals	6	100%	6	100%	100%

The bank's employees routinely provide their financial expertise to local organizations that provide community development services to the community through board and committee memberships. The following table outlines qualified community service activities provided by Minster senior management and employees:

Habitat for Humanity	A bank officer is on board and lends financial expertise to organization.
St. Mary's Community Improvement Corp.	One consumer lender is an active member of St. Mary's Community Improvement Corp (CIC) and is on the Revolving Loan Fund board (Community Development Block Grant). The St. Mary's CIC serves the community and assists with Industrial Revenue Bond financing, tax abatement, and a first time home-owners assistant program.
Ohio Saves	Minster is an active participant of this program, providing classroom training throughout the assessment area on financial literacy. The bank has also promoted a first-time saver program associated with this program and opened 109 accounts during this exam period. The program offers a savings account with a very low or no-minimum balance and minimal or no fees which supports this program.
Auglaize County Council on Aging	Bank staff participated in programs geared towards fraud awareness for seniors and long-term care insurance.

METROPOLITAN ASSESSMENT AREA
(Limited Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
DAYTON, OHIO MSA 19380**

The Dayton MSA 19380 is comprised of the following four counties: Green, Miami, Montgomery, and Preble. However, Minster's assessment area is only comprised of entirety of Miami County. The assessment area consists of 20 census tracts, of which none are low-income, three are moderate-income, 14 are middle-income, and three are upper-income tracts. Minster operates one branch with a full-service ATM in this assessment area. Based on the bank's limited presence and lending volume originated in this area, a limited scope review was conducted.

According to 2000 U.S. Census data, the population within the assessment area is 98,868. The population increased to 102,506 in 2010. The median family income in 2000 was \$51,140. The family poverty rates in 2000 were approximately 5.0%. Estimates from 2010 indicate that the percentage of the population in poverty is 11.9%.

According to the FDIC Deposit Market Share Report,⁸ as of June 30, 2011, Minster's market share of deposits accounts for 1.6% of the market and the bank ranks 12th out of 13 institutions operating 40 offices in Miami County. The top five institutions in this market are Fifth Third Bank, U.S. Bank, The Park National Bank, Mainsource Bank, and JP Morgan Chase with 73.8% of the market share and operating 28 (70.0%) of the total offices in the county.

One community contact was conducted in order to provide additional information regarding this assessment area. The community contact provided context to the demographic and economic characteristics of the county. The contact specifically mentioned Minster as providing support and donations. Minster provided the non-profit with preferred rates on investments and reduced fees on its banking products. Overall, the contact noted a very positive relationship with the banking community in Miami County. The contact described the local economy as rebounding and commented on several indicators within his field of expertise to qualify the statement. All of the organization's clientele are low-income and often work in seasonal employment. The contact identified two additional credit-related products that would assist the low-income households: a program that would provide bridge loans for seasonal employees and some micro-lending to help very small or cottage industries within the community.

The following chart illustrates the demographics of the Dayton MSA assessment area.

⁸ FDIC/OTS Summary of Deposits Website: www.fdic.gov

Combined Demographics Report

Assessment Area(s): Dayton AA 2011

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,758	16.9
Moderate-income	3	15.0	4,227	15.0	493	11.7	5,519	19.6
Middle-income	14	70.0	19,033	67.6	805	4.2	7,053	25.0
Upper-income	3	15.0	4,898	17.4	131	2.7	10,828	38.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	20	100.0	28,158	100.0	1,429	5.1	28,158	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	6,762	3,757	13.5	55.6	2,493	36.9	512	7.6
Middle-income	27,601	18,828	67.7	68.2	7,374	26.7	1,399	5.1
Upper-income	6,191	5,215	18.8	84.2	770	12.4	206	3.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	40,554	27,800	100.0	68.6	10,637	26.2	2,117	5.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	666	15.1	585	14.9	37	15.2	44	20.2
Middle-income	3,061	69.6	2,738	69.6	170	69.7	153	70.2
Upper-income	671	15.3	613	15.6	37	15.2	21	9.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,398	100.0	3,936	100.0	244	100.0	218	100.0
Percentage of Total Businesses:				89.5		5.5		5.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	9	2.5	9	2.5	0	0.0	0	0.0
Middle-income	331	91.4	329	91.4	2	100.0	0	0.0
Upper-income	22	6.1	22	6.1	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	362	100.0	360	100.0	2	100.0	0	.0
Percentage of Total Farms:				99.4		.6		.0

Based on 2010 D&B information according to 2000 Census Boundaries.

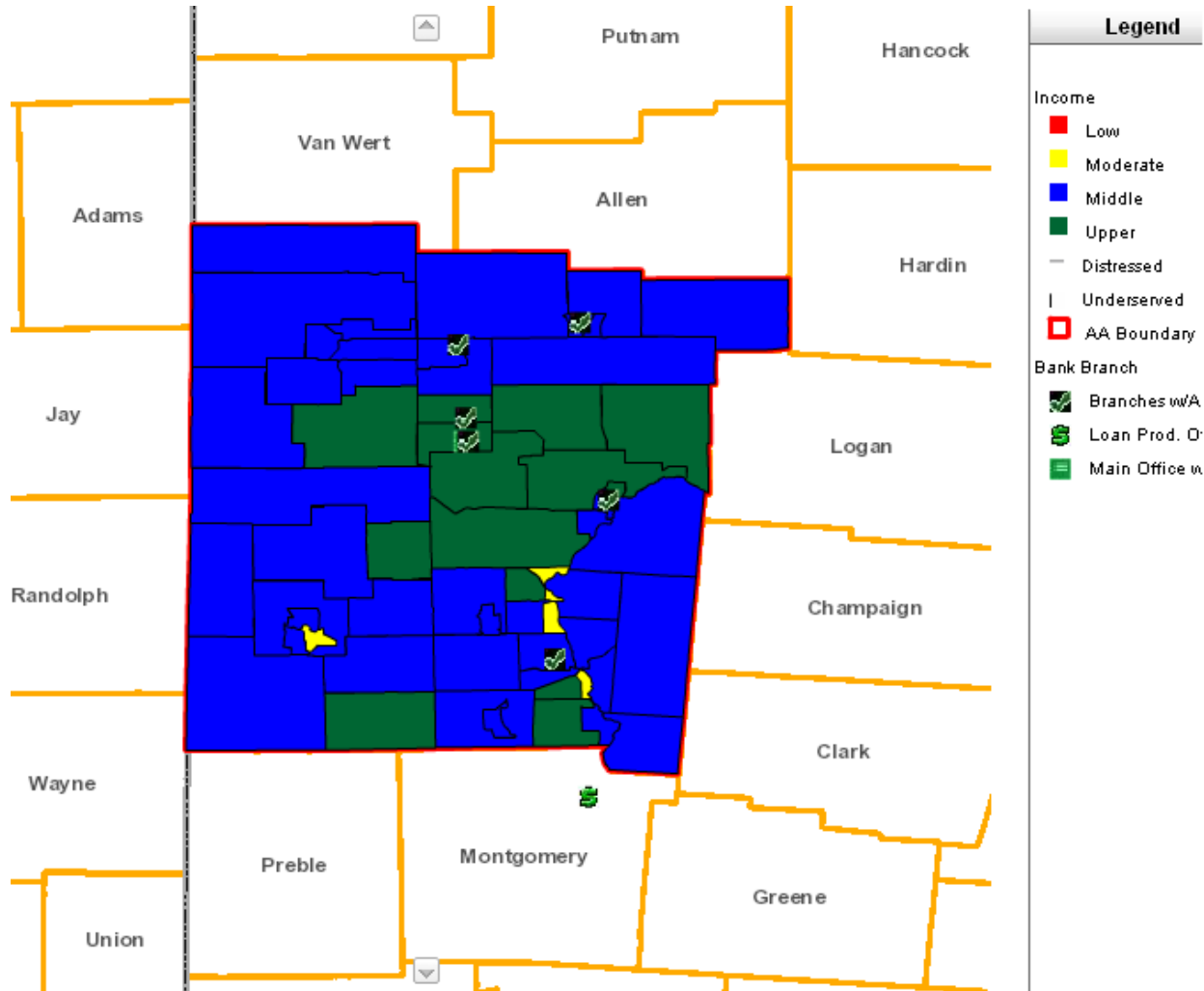
**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTING IN
DAYTON, OHIO MSA 19380**

Although Minster's performance in this assessment area with respect to the lending test was consistent with the performance for the institution overall, HMDA and consumer lending to low-income borrowers was poor. However, lending to moderate-income borrowers was considered adequate.

Minster's performance relating to community development lending, services, and investments was found to be below the performance for the institution overall. There were no community development loans made in the assessment area during the evaluation period and only one qualified investment totaling \$5,000. Community development services were limited to one activity.

Facts and data reviewed, including performance and demographic information, can be found in the core tables accompanying the report.

APPENDIX A
ASSESSMENT AREA MAP



APPENDIX B

GLOSSARY OF TERMS

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved non-metropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments and branch distribution).

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

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

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

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

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

Small loan(s) to business(es): A loan included in loans to small businesses as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as small business loans if the loans are reported on the TFR as non-mortgage, commercial loans.

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

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