



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

November 30, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Lorain National Bank
Charter Number: 14290

457 Broadway
Lorain, OH 44052-1769

Office of the Comptroller of the Currency

Northern Ohio Field Office
200 Public Square, Suite 1610
Cleveland, OH 44114-2301

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

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors supporting the institution's rating are:

- The distribution of loans to borrowers of different incomes is reasonable and meets the standards for satisfactory performance. The distribution of loans to businesses of different sizes exceeds the standards for satisfactory performance.
- The geographic distribution of loans reflects more than reasonable dispersion and exceeds the standards for satisfactory performance.
- The bank's loan-to-deposit ratio is reasonable and meets the standards for satisfactory performance.
- A substantial majority of lending activity has occurred within the bank's Assessment Areas (AAs). This performance exceeds the standards for satisfactory performance.
- The bank's community development performance is satisfactory and demonstrates adequate responsiveness to community development needs in its AAs.

Scope of Examination

The evaluation time period is May 8, 2006 (the date of the previous evaluation) through June 30, 2009. We analyzed home mortgage and business loan activity from January 1, 2007 through June 30, 2009. All reportable home mortgage data was considered in our analysis. Analysis of business loan activity is based on an initial sample of 60 loans in accordance with loan sampling guidelines. We also considered community development loan, investment, and service activity from May 8, 2006 through November 30, 2009.

Lorain National Bank (LNB) has three AAs for analysis purposes. The primary AA consists of Lorain County and portions of western Cuyahoga County, which are a part of the Cleveland-Elyria-Mentor Metropolitan Statistical Area (MSA). We selected this area for a full-scope review as it contains the bank's main headquarters, the majority of its branch locations, and a substantial majority of its lending activity.

The bank's second AA includes fourteen census tracts in Summit County and two census tracts in Portage County which includes a branch in Hudson, Ohio acquired in May 2007 and fully integrated into LNB in November 2007. These tracts comprise a portion of the Akron, Ohio MSA. The third AA includes three census tracts in Erie County which abut the western border of Lorain County. As a substantial majority of the

lending occurs within the Cleveland-Elyria-Mentor MSA, these other assessment areas received a limited scope review.

Information from members of the local community was considered as well. We contacted four community organizations involved in affordable housing, social services, and economic development initiatives. Refer to the **Description of Assessment Area** section of this document for additional details.

Description of Institution

LNB is a full service community bank headquartered in Lorain, Ohio. This intrastate bank services northeast Ohio. As of June 30, 2009, the bank reported total assets of \$1.2 billion. LNB is a wholly owned subsidiary of LNB Bancorp Inc., a one-bank holding company also headquartered in Lorain. North Coast Community Development Corporation (NCCDC) is a fully owned subsidiary of LNB. NCCDC was formed in 2002 to provide commercial loans to low- and moderate-income communities in Lorain County.

LNB offers a broad range of loan products including home mortgage, consumer, and commercial loans. The bank added online banking, telephone banking, and investment banking since the last CRA exam. The bank's business strategy is to focus on real estate lending to retail and commercial customers. Using bank-generated loan origination reports for the evaluation period, we determined the bank's primary products are home mortgage and business loans.

As of June 30, 2009, the bank's loan portfolio was comprised of real estate loans (76 percent), consumer loans (16 percent), commercial loans (7 percent), and other loans (1 percent). The real estate portfolio is comprised of construction loans (11 percent), home mortgage loans (20 percent), home equity loans (17 percent), multifamily residential loans (4 percent) and commercial mortgage loans (48 percent).

LNB operates 15 full-service branches plus an additional drive-up facility. In addition, the bank operates four banking centers at retirement communities in the Lorain-Cuyahoga AA, with access restricted to residents of those communities. The bank opened two new offices (North Ridgeville in July, 2006 and Chester Commons in January, 2007) and closed three offices (West Park in December, 2007, Kansas Avenue in March, 2008, and Cleveland Street in October, 2009) during the evaluation period.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the communities it serves. The previous CRA examination was dated May 8, 2006 and resulted in a rating of "Outstanding."

Description of Assessment Area

LNB's full-scope assessment area is described below.

Lorain-Cuyahoga Assessment Area

Demographic Information for the Lorain-Cuyahoga AA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts)	98	3.06	20.41	44.90	31.63
Population by Geography	378,619	1.93	17.64	46.03	34.40
Owner-Occupied Housing by Geography	150,932	0.78	14.06	47.70	37.47
Businesses by Geography	25,379	2.91	12.83	42.97	41.30
Farms by Geography	783	1.28	5.36	55.04	38.31
Family Distribution by Income Level	102,252	1.74	16.72	46.76	42.12
Distribution of Low- and Moderate-Income Families throughout AA Geographies	33,744	7.20	5.96	32.88	18.55
Median Family Income (MFI) = \$58,930 HUD Adjusted Median Family Income for 2009 = \$64,800 Households Below the Poverty Level = 7.32%			Median Housing Value = \$126,639 Non-Adjusted Unemployment Rate Lorain County = 11.1% Cuyahoga County = 10.2%		

Source: 2000 U.S. Census and 2009 HUD updated MFI.

The Lorain-Cuyahoga AA is comprised of Lorain County and western portions of Cuyahoga County within the Cleveland-Elyria-Mentor MSA. This AA meets the requirements of the regulation. The bank's main office is located in this AA, as well as all but one of its full-service branches.

Based on the June 30, 2009 Federal Deposit Insurance Corporation (FDIC) deposit data, LNB is ranked first with a 14.74 percent share of the insured deposit market. Overall, there are 20 insured deposit institutions that operate a total of 135 offices in the market area. Other major competitors and their corresponding market shares include FirstMerit (13.83 percent), National City Bank (11.08 percent), Fifth Third Bank (10.11 percent), and Third Federal Savings (9.23 percent).

The local economy weakened during the evaluation period with the continued loss of manufacturing jobs and limited economic development opportunities. The area's unemployment rate was at or below the State of Ohio's statewide non-adjusted rate of 11.1 percent. Both counties outpaced the national non-adjusted unemployment rate of 9.5 percent. All unemployment rates are as of June 30, 2009. Some major employers within the AA include Ford Motor Corporation, Nordson Corporation, Republic Engineered Products, Invacare Corporation, and Emerson Electric/Ridge Tool.

We determined the community's credit needs by contacting representatives from local community and economic development organizations as well as conducting discussions with bank management.

We identified the following credit and non-credit needs in this AA:

- Increase in local financial institution funding for existing individual deposit account, homeownership, and foreclosure prevention programs targeted to low- and moderate-income households.
- Small dollar consumer loans to help build or reestablish a good credit history.
- Lines of credit to affordable housing and social services agencies for remodeling and expansion projects.
- In-kind assistance to help with financial literacy and tax preparation programs for low- and moderate-income households and seniors.

Conclusions with Respect to Performance Tests

Performance under the lending test is Satisfactory. This conclusion is based primarily on performance within the Lorain-Cuyahoga full scope AA, with borrower and geographic distribution components receiving the most weight. See separate sections entitled **Limited Scope – Summit-Portage AA** and **Limited Scope - Erie County AA** for information on the bank's borrower and geographic distribution performance in these limited-scope AAs.

LENDING TEST

Loan-to-Deposit Ratio

The bank's net loan-to-deposit ratio is reasonable and meets the standards for satisfactory performance given the bank's size and financial condition, and the credit needs of the bank's AAs. The bank's average quarterly loan-to-deposit ratio over the 13 quarters ending June 30, 2009 was 85.57 percent. This was modestly lower than the 91.17 percent experienced by its national peer group of banks during the same time period. It is also noted that LNB's loan-to-deposit ratio as of June 30, 2009 was 76.54 percent.

Lending in Assessment Area

Table 1 details LNB's lending in its AAs by number of loan originations and dollar volume during the evaluation period.

LNB's record of lending in its AAs is more than reasonable and exceeds the standards for satisfactory performance. A substantial majority of lending activity has occurred within the bank's AAs. As reflected in Table 1, approximately 80 percent of the number of loans and 74 percent of dollars of loans originated during the evaluation period are located within the bank's AAs. We base these percentages on all home mortgage activity and a sample of business loans originated by the bank during the evaluation

period.

Table 1 - Lending in LNB's Assessment Areas										
Loan Type	Number of Loans					Dollars of Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,277	80.21	315	19.79	1,592	135,117	74.14	47,128	25.86	182,245
Business	37	61.67	23	38.33	60	5,120	62.39	3,086	37.61	8,206
Totals	1,314	79.54	338	20.46	1,652	140,237	73.63	50,214	26.37	190,451

Source: Reported HMDA Data and sample of 60 business loans.

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

The borrower distribution of loans reflects a reasonable penetration among borrowers of different incomes and excellent penetration to businesses of different sizes.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community. Refer to the **Description of Assessment Areas** section for demographic information including poverty rates.

Lorain-Cuyahoga AA

The overall borrower distribution of loans is reasonable in the Lorain-Cuyahoga AA. We base this finding on reasonable penetration of home mortgage loans among borrowers of different income levels and excellent penetration of business loans among businesses of different sizes. Refer to Table 2 for the primary data used to assess the borrower distribution of home mortgage lending in the Lorain-Cuyahoga AA.

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	15.68	9.05	17.32	24.76	23.53	18.10	43.47	46.19
Home Improvement	15.68	17.72	17.32	36.71	23.53	21.52	43.47	22.78
Home Refinance	15.68	9.16	17.32	19.39	23.53	23.52	43.47	45.24

Source: Data reported under HMDA; 2000 U.S. Census data
 Income information was not reported for 1.9% of home purchase, 1.3% of home improvement and 2.7% of home refinance loans within the Lorain-Cuyahoga AA.

The distribution of home purchase loans reflects reasonable penetration among borrowers of different income levels. While the percentage of home purchase loans to low-income borrowers is significantly below the percentage of low-income families in the area, consideration is given to the impact that the area’s poverty level has on the opportunities to lend to the low-income segment of the community. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

The distribution of home improvement loans reflects excellent penetration among borrowers of different income levels. The percentage of loans to both low- and moderate income borrowers exceeds the percentages of low- and moderate-income families in the AA.

The distribution of home refinance loans reflects reasonable penetration among borrowers of different income levels. While the percentage of loans to low-income borrowers is significantly below the percentage of low-income families in the area, consideration is given to the impact that the area’s poverty level has on the opportunities to lend to the low-income segment of the community. The percentage of loans to moderate-income borrowers is near the percentage of moderate-income families in the AA.

The distribution of business loans reflects excellent penetration among businesses of different sizes. This is based on a sample of 50 business loans, where 96 percent of loans were made to businesses with gross annual revenues of less than \$1 million. According to Dun & Bradstreet business demographic data, 76 percent of area businesses have gross annual revenues less than or equal to \$1 million, although revenue data is not available for approximately 19 percent of the AA’s businesses.

Geographic Distribution of Loans

The geographic distribution of loans reflects more than reasonable dispersion among geographies of different income levels and exceeds the standards of satisfactory performance. We based this conclusion on performance from the Lorain-Cuyahoga AA

only. As both the Summit-Portage and Erie County AAs have no low- or moderate-income areas, geographic distribution analyses are not meaningful for those areas.

Home Mortgage Lending – Lorain-Cuyahoga AA

In drawing conclusions, we placed more weight on moderate-income performance, as this segment of the community represents a significantly larger portion of the AA than the low-income segment. There is limited opportunity to lend in low-income areas as less than one percent of the area’s owner-occupied housing units are located in those portions of the AA. Refer to Table 3 below for the primary data used to assess the geographic distribution of home mortgage lending.

Table 3 - Geographic Distribution of Residential Real Estate Loans in Lorain-Cuyahoga AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	0.78	1.43	14.06	9.52	47.70	54.76	37.47	34.29
Home Improvement	0.78	0.00	14.06	26.58	47.70	63.29	37.47	10.13
Home Refinance	0.78	1.80	14.06	19.93	47.70	58.17	37.47	20.11

Source: Data reported under HMDA; 2000 U.S. Census data.

The distribution of home purchase loans reflects a reasonable dispersion among census tracts of different income levels. Loans made in low-income census tracts exceed the percentage of owner-occupied housing in the AA. The percentage of loans made in moderate-income areas is well below the percentage of owner-occupied housing units located in the moderate-income portions of the AA.

The distribution of home improvement loans reflects an excellent dispersion among census tracts of different income levels. Although the bank did not make loans in the low-income census tract, limited opportunities exist as there is less than one percent of owner-occupied housing in this census tract. The percentage of loans made in moderate-income areas substantially exceeds percentage of owner-occupied housing units located in the moderate-income portions of the AA.

The distribution of home refinance loans reflects an excellent dispersion of loans among census tracts of different income levels. The percentage of loans made in low- and moderate-income areas exceeds the percentage of owner-occupied housing units for that segment of the community.

Business Lending – Lorain-Cuyahoga AA

The dispersion of business loans among census tracts of different income levels is reasonable. The percentages of loans in low-income areas and moderate-income areas

are near, or in excess of, the percentages of businesses located in those segments of the AA. Refer to Table 4 below for the primary data used to assess the geographic distribution of business lending.

Table 4 - Geographic Distribution of Loans to Businesses in Lorain-Cuyahoga AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses/ Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans
Business	2.91	2.00	12.83	14.00	42.97	64.00	41.30	20.00

Source: Business sample results; 2009 Dun & Bradstreet business data

Limited Scope – Summit-Portage AA

LNB’s Summit-Portage AA is comprised of fourteen census tracts in Summit County and two census tracts in Portage County. This AA includes an office in Hudson, Ohio acquired in May 2007 and fully integrated into LNB in November 2007. Five middle-income census tracts and eleven upper-income census tracts comprise this AA and are a portion of the Akron, Ohio MSA.

Based on limited scope reviews, LNB’s performance under the lending test in the Summit-Portage AA is weaker than the bank’s overall satisfactory performance under the lending test.

Table 5 - Borrower Distribution of Home Mortgage Loans in Summit-Portage County AA								
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	7.88	0.00	11.30	12.50	18.74	0.00	62.07	87.50
Home Improvement	7.88	50.00	11.30	0.00	18.74	0.00	62.07	50.00
Home Refinance	7.88	0.00	11.30	4.17	18.74	25.00	62.07	70.83

Source: Data reported under HMDA; 2000 U.S. Census data.

LNB’s distribution of home mortgage lending among borrowers of different income levels is less than reasonable. The percentages of home purchase loans to moderate-income borrowers and home improvement loans to low-income borrowers exceed the percentage of families located in those parts of the AA. However, the percentage of home refinance loans to moderate-income borrowers is significantly below the percentage of moderate-income families in the AA. No home purchase or home improvement loans were made to low-income borrowers and no home improvement loans were made to moderate-income borrowers in the AA.

Consideration is given to the several factors which impact these findings. First, the area’s poverty level limits opportunities to lend to the low-income segment of the community. Secondly, approximately 69 percent of this AA consists of upper-income geographies with higher median housing valuations, making it more difficult to own a home and make improvements to it. Finally, the area’s rising unemployment level and uncertainty of continued employment offer limited opportunities to originate these types of loans.

LNB’s distribution of lending to businesses of different sizes is excellent. This is based on a sample of five business loans originated during the evaluation period where 100 percent of the loans were to businesses with gross annual revenues of less than \$1 million. This exceeds the 73.18 percent of area businesses that have gross annual revenues less than or equal to \$1 million, according to Dun & Bradstreet business demographic data, although 19.8 percent of businesses did not report income.

An evaluation of the geographic distribution of loans is not meaningful in the limited-scope AA, as no low- or moderate-income geographies are in this AA.

Limited Scope – Erie County AA

LNB’s Erie County AA is comprised of three census tracts within the Sandusky, Ohio MSA. This area is contiguous to the western border of Lorain County. This AA consists of three middle-income census tracts within the village of Vermilion. The bank has one full-service branch and one ATM in Vermilion in Lorain County.

Based on limited scope reviews, LNB’s performance under the lending test in the Erie County AA is not inconsistent with to the bank’s overall satisfactory performance under the lending test.

Table 6 - Borrower Distribution of Home Mortgage Loans in Erie County AA								
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	13.64	6.25	17.85	31.25	25.83	25.00	42.68	37.50
Home Improvement	13.64	11.11	17.87	22.22	25.83	22.22	42.68	33.33
Home Refinance	13.64	5.97	17.85	17.91	25.83	26.87	42.68	44.78

Source: Data reported under HMDA; 2000 U.S. Census data. Income information was not reported for 11.1% of home improvement and 4.9% of home refinance loans within the Erie County AA.

LNB’s distribution of home mortgage lending among borrowers of different income levels is reasonable. The percentages of home purchase, home improvement, and home refinance loans to moderate-income borrowers exceed the percentage of

moderate-income families in the AA. While the percentage of home purchase and home refinance loans to low-income borrowers is significantly lower than the demographic, the percentages of home improvement loans are near the percentage of low-income families in the AA.

LNB's distribution of lending to businesses of different sizes is excellent. This is based on a sample of seven business loans originated during the evaluation period where 100 percent of the loans were to businesses with gross annual revenues of less than \$1 million. This exceeds the 79.52 percent of area businesses that have gross annual revenues less than or equal to \$1 million, according to Dun & Bradstreet business demographic data, although 16.6 percent of businesses did not report income.

An evaluation of the geographic distribution of loans is not meaningful in the limited-scope AA, as no low- or moderate-income geographies are in this AA.

Responses to Complaints

LNB has not received any written complaints during the evaluation period regarding its performance meeting the credit and deposit needs of its AAs.

COMMUNITY DEVELOPMENT TEST

LNB's community development performance, shown through its record of retail services, community development loans, qualified investments, and community development services, demonstrates adequate responsiveness to community development needs in its AA and is rated "Adequate."

Number and Amount of Community Development Loans

Lorain-Cuyahoga AA

LNB originated ten community development loans during the evaluation period totaling \$10.7 million. Nine loans were made to finance small business expansion and retention, and one loan was for a central business district revitalization project. These loans were funded utilizing the new market tax credits by NCCDC. These loans are in addition to four loans originated during the last evaluation period for similar purposes.

LNB offers two home loan programs for borrowers who do not typically qualify for credit under traditional loan programs. These programs address the needs of low- and moderate-income borrowers, individuals located in underserved areas, and first-time home buyers. Borrowers in each program must meet income eligibility requirements. Features include low down payment amounts, down payment or closing cost assistance, and flexible credit terms. As of November 30, 2009, the bank has made five loans through these programs. Community Development performance in this AA is "Adequate."

Summit-Portage AA

LNB did not make any qualified community development loans in the Summit-Portage AA during the evaluation period. This had a neutral impact on the bank's lending performance in the Summit-Portage AA due to the bank's limited presence within the AA.

Erie County AA

LNB did not make any qualified community development loans in the Erie County AA during the evaluation period. This had a neutral impact on the bank's lending performance in the Erie County AA due to the bank's limited presence within the AA.

Number and Amount of Qualified Investments

Lorain-Cuyahoga AA

During the evaluation period, the bank's qualified investments include the purchase of two economic development revenue bonds totaling \$5 million. In addition, the bank made 102 qualified donations to 52 organizations totaling \$267 thousand. All funds are specifically targeted to benefit low- and moderate-income persons, low- and moderate-income census tracts within the AA, or support organizations whose main purpose is providing economic development, revitalization of central business districts, and offering assistance to attract, expand and retain small business entities, payrolls and job levels throughout the AA.

Summit-Portage AA

LNB did not make any qualified community development investments in the Summit-Portage AA during the evaluation period. This had a neutral impact on the bank's community development performance in the Summit-Portage AA due to the bank's limited presence within the AA.

Erie County AA

LNB did not make any qualified community development investments in the Erie County AA during the evaluation period. This had a neutral impact on the bank's community development performance in the Erie County AA due to the bank's limited presence within the AA.

Extent to Which the Bank Provides Community Development Services

Lorain-Cuyahoga AA

The bank has 20 branches and 26 ATMs in its AA. Six branches and eight ATMs are in low- or moderate-income census tracts, comprising 33 percent of the bank's branches and 27 percent of the bank's ATMs. This compares favorably with the 23 percent of low-

and moderate-income census tracts within the AA. Four branches and two ATMs are housed in retirement centers within the AA. Nine ATMs are stand-alone units located at local retail establishments, a hospital, and two colleges.

In addition to the full-service branches and ATM locations, which offer a full range of consumer and commercial banking products and services, LNB offers TeleBanker on-line services (providing customer access to consumer and business accounts) as well as Tele-Pay bill payment system (allowing customers to make bill payments directly from their deposit accounts). LNB offers free checking accounts to all its customers. Since there is no data to reflect how this has impacted low- and moderate-income segments of the community, we cannot place any weight on this for CRA purposes.

Through its employees, LNB is involved in a variety of community development services. Many of the bank's employees and officers, using their financial expertise, are involved in non-profit organizations that provide services for low- and moderate-income individuals or economic development for small businesses. LNB participates in 25 of the major groups active in meeting the housing, service, and economic needs of low- to moderate-income households and geographies. Senior management is actively involved in several economic development organizations to meet small business needs including start-up loans and the rehabilitation and re-stabilization of central business districts.

In support of affordable housing and economic development, LNB also sponsors quarterly seminars through NCCDC on topics such as starting a small business, handling personal finances, and buying your first home. These seminars occur throughout the bank's AA and are targeted to low- and moderate-income households and geographies.

The CRA Officer meets with LNB's Senior Management Team on a weekly basis for status updates on current and proposed projects. LNB's President schedules bimonthly meetings with the CRA Officer to meet with community leaders to assess unmet credit needs and better utilize bank resources in this area. The CRA Officer also serves on a number of economic development organizations in Elyria, Lorain, and Oberlin devoted to revitalizing central business districts throughout Lorain County.

Summit-Portage AA

LNB provides community development services to the Summit-Portage AA through various organizations that service the Hudson area. This has a neutral impact on the bank's community development service performance in the Summit-Portage AA due to the bank's limited presence within the AA.

Erie County AA

LNB provides community development services to the Erie County AA through various organizations which service the Vermilion area. This has a neutral impact on the bank's community development service performance in the Erie County AA due to the bank's limited presence within the AA.

Responsiveness to Community Development Needs

LNB's community development performance, shown through its record of retail services, community development loans, qualified investments, and community development services, demonstrates adequate responsiveness to community development needs in its AA and is rated "Satisfactory."

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.