



## **PUBLIC DISCLOSURE**

August 21, 2017

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The First Central National Bank of St. Paris  
Charter Number 2488

103 South Springfield Street  
St. Paris, Ohio 43072

Office of the Comptroller of the Currency

Westlake Center  
4555 Lake Forest Drive, Suite 520  
Cincinnati, Ohio 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.

## Table of Contents

<b>OVERALL CRA RATING.....</b>	<b>3</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS.....</b>	<b>4</b>
<b>DESCRIPTION OF INSTITUTION .....</b>	<b>8</b>
<b>SCOPE OF THE EVALUATION .....</b>	<b>9</b>
<b>DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....</b>	<b>10</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS .....</b>	<b>11</b>
<b>LENDING TEST.....</b>	<b>.11</b>
<b>APPENDIX A: SCOPE OF EVALUATION .....</b>	<b>A-1</b>
<b>APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS .....</b>	<b>B-1</b>

## **Overall CRA Rating: Satisfactory**

**The Lending Test is rated: Satisfactory.**

- The First Central National Bank of St. Paris (FCNB or the bank) makes a substantial majority of their loans inside their assessment area (AA). Ninety-five percent of the number of loans in our sample were inside the bank's AA.
- Lending to borrowers of different income levels and businesses and farms of different sizes reflects reasonable penetration.
- FCNB's loan-to-deposit (LTD) ratio is reasonable when compared to similarly-situated financial institutions.

## 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/assessment area.

**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 the U.S. Department of Housing and Urban Development Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**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 refinancings, 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 metropolitan area/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 Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

**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

FCNB is a wholly owned subsidiary of Central Bancshares Inc., a one-bank holding company. Both FCNB and its holding company are headquartered in St. Paris, Ohio. St. Paris is approximately 55 miles west of Columbus, Ohio in the western portion of Champaign County. The bank operates two full service offices which includes the main office in St. Paris and a branch office in Christiansburg, Ohio. The bank operates one limited-service branch (no lending activity) located in Rosewood, Ohio. FCNB has a 24-hour ATM at its main office location in St. Paris and an off-premise ATM at a restaurant in Christiansburg. The bank has drive-thru facilities at all offices, except Rosewood. All of the bank's offices and ATMs are located in middle-income census tracts (CTs) in Champaign County, Ohio. In July 2013, the bank closed one office in St. Paris, which was located in a middle-income CT.

FCNB has designated one AA in Ohio which is located in a non-MSA area (Non-MSA AA). This AA includes all the CTs in Champaign County, four CTs in the western section of Logan County, one CT in the southeastern part of Shelby County, and one CT in the eastern section of Miami County. In the AA, 18.75 percent of the CTs are moderate-income, 43.75 percent are middle-income, and 37.50 percent are upper-income CTs. There are no low-income CTs in the AA. The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- or moderate-income areas.

FCNB maintains a diverse loan portfolio and reported total assets of \$92.3 million at June 30, 2017. The bank's primary business focus includes agricultural production and farmland loans (farm loans), residential real estate loans, and commercial/commercial real estate loans (business loans). The bank offers standard deposit products and services through its network of offices.

As of June 30, 2017, FCNB reported tier 1 capital of \$15.8 million, or 17.1 percent of total assets. For the same time period, the bank's net loan portfolio totaled \$50.3 million, with net loans representing 54.5 percent of total assets. As of the June 30, 2017 call report, the bank's loan mix based on dollar volume consisted of 50 percent in farm loans, 21 percent in residential real estate loans, 22 percent in business loans, 4 percent in consumer loans, and 3 percent in other loans. During the lending evaluation period (2014 - 2016), the loan mix based on dollar volume originated/purchased consisted of 66 percent in farm loans, 13 percent in residential real estate loans, 14 percent in business loans, and 7 percent in consumer loans.

Competition in the AA is strong with state and national banks, credit unions, savings and loans, and branches of larger financial institutions. As of June 30, 2016, FCNB had approximately a 1.9 percent deposit market share in their entire AA that includes CTs in Champaign, Logan, Shelby, and Miami Counties and was ranked sixteenth out of 30 financial institutions. As of the same time period, FCNB had a 10.3 percent deposit market share in Champaign County only and was ranked fifth out of seven financial

institutions. The source of the deposit market share information is the June 30, 2016, Deposit Market Share Report from the Federal Deposit Insurance Corporation (FDIC).

There are no financial or legal impediments that affect FCNB's ability to help meet the credit needs of their AA. FCNB received a "Satisfactory" rating during the last CRA review dated June 17, 2013.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We conducted a full-scope CRA evaluation to assess the bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas. We used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The Lending Test includes loans originated or purchased from January 1, 2014 through December 31, 2016 (lending evaluation period). Residential real estate, farm, and business loans are the bank's primary lending products and were evaluated in the Lending Test. We randomly sampled 20 loans originated/purchased during the lending evaluation period from each primary lending product. We used the 2010 U.S. Census data to analyze performance for the Lending Test.

### **Data Integrity**

The bank is not a HMDA or CRA loan data reporter. Therefore we randomly sampled 20 residential real estate, business, and farm loans from the lending evaluation period. We reviewed source documentation for each of the loans in our sample, and did not note any data integrity issues.

### **Selection of Areas for Full-Scope Review**

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

### **Ratings**

The bank's overall rating is based on the review of the Non-MSA AA.

## **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

FCNB's lending performance is satisfactory.

#### Loan-to-Deposit Ratio

The LTD ratio is reasonable given the bank's size, financial condition, and AA credit needs. FCNB has an average LTD ratio of 71.2 percent over the 17 quarters (June 30, 2013 to June 30, 2017) since the prior CRA evaluation. The bank's quarterly LTD ratio ranged from a low of 66.8 percent at June 30, 2017, to a high of 75.1 percent at September 30, 2014. The average LTD ratio for similarly situated banks in Champaign, Logan, and Shelby counties was 77.9 percent as of the same time frame. Two of these banks were outliers with LTD ratios of 111.7 percent and 107.2 percent. When removing the outliers from the average, the new LTD average for similarly situated banks is 70 percent. Overall, the bank's average LTD ratio of 71.2 percent is commensurate with its peer banks.

#### Lending in Assessment Area

The bank's record of lending within its AA reflects a substantial majority of the bank's lending inside the AA. As outlined in the description of the institution above, the bank's primary loan types are residential real estate, farm, and business loans. According to our sample, the bank made 95 percent of the number of loans and 98 percent of the dollar amount of loans within its AA. Table 1 details the bank's lending within the AA by number and dollar volume. This table demonstrates that a substantial majority of the loans in our samples were made inside the bank's AA.

Loan Type	Number of Loans					Dollars of Loans (in 000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Residential Real Estate Loans	19	95%	1	5%	20	\$1,760	98%	\$40	2%	\$1,800
Farm Loans	20	100%	0	0%	20	\$3,727	100%	\$0	0%	\$3,727
Business Loans	18	90%	2	10%	20	\$1,423	95%	\$76	5%	\$1,499
Totals	57	95%	3	5%	60	\$6,910	98%	\$116	2%	\$7,026

Source: Loan sample; loans originated/purchased from January 1, 2014 through December 31, 2016.

## Lending to Borrowers of Different Incomes and to Farms / Businesses of Different Sizes

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

The distribution of residential real estate loans to borrowers of different income levels is outstanding and reflects excellent penetration. The bank's residential real estate loans in our sample demonstrated that the bank's lending serves the needs of low- and moderate-income borrowers. The bank's lending to moderate-income borrowers reflected excellent penetration at 20 percent compared to the percentage of moderate-income families in the AA (16.4 percent). The distribution of residential real estate loans to low-income borrowers was lower than the percentage of families in the AA, but was reasonable. We note that the 9.8 percent poverty rate limits lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards. Refer to Table 2 for the distribution of residential real estate loans among borrowers of different income levels in our sample.

Borrower Income Level	Low		Moderate		Middle		Upper	
	% 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
Residential Real Estate Loans	18.07%	15.00%	16.43%	20.00%	22.09%	15.00%	43.41%	50.00%

Source: Loan Sample; 2010 U.S. Census data, updated as of 2016.

The bank's lending to farms of different sizes is reasonable and reflects satisfactory performance. A majority of the loans in our business loan sample were to small farm operations with annual gross revenues of less than \$1 million. FCNB originated 84 percent of the dollar volume of loans in our farm loan sample to farms with gross revenues of \$1 million or less, which compared reasonably to the 99 percent of AA farms with similar revenues. The bank made 95 farm loans during the lending evaluation period, with several large loans made to the same borrowers. Refer to Table 3 for details on the borrower distribution of farm loans in our sample.

Farm Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Farms	98.65%	0.90%	0.45%	100%
% of Bank Loans in AA by #	80.00%	15.00%	5.00%	100%
% of Bank Loans in AA by \$	84.08%	15.61%	0.31%	100%

Source: Loan Sample; Dun and Bradstreet data as of June 2016; 2010 U.S. Census data.

The bank's lending to businesses of different sizes reflects reasonable penetration. A majority of the loans in our business loan sample were to small businesses with annual

gross revenues of less than \$1 million. FCNB originated 70 percent of the number of loans in our business loan sample to businesses with gross revenues of \$1 million or less, which compared reasonably to the 83 percent of AA businesses with similar revenues. The bank made 52 business loans during the lending evaluation period. In addition, the bank had four loans in our sample with no income information available. Refer to Table 4 for more details on the borrower distribution of business loans in our sample.

Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	83.22%	4.52%	12.26%	100%
% of Bank Loans in AA by #	70.00%	10.00%	20.00%	100%
% of Bank Loans in AA by \$	66.67%	21.94%	11.39%	100%

Source: Loan Sample; Dun and Bradstreet data as of June 2016; 2010 U.S. Census data.

## Geographic Distribution of Loans

The geographic distribution of loans reflects poor dispersion throughout the AA. Competition for loans is strong in the bank's AA. There are no low-income CTs in the AA. Our sample of residential, business, and farm loans identified only one loan (business loan) in a moderate-income CT. There are three moderate-income CTs in the bank's AA. All three are located a significant distance from any of the bank's branch locations. Additionally, two are located in the Urbana city area which is heavily banked and primarily residential as opposed to having vast business and farm lending opportunities as well.

Within our sample, the bank did not originate or purchase any residential real estate loans located in moderate-income CTs in the AA reflecting poor dispersion. However, as noted above, there are only three moderate-income CTs; two of which are located in the Urbana city area which is heavily banked. The other is located in Logan County, which is a significant distance from any of the bank's branch locations.

Census Tract Income Level	Low		Moderate		Middle		Upper	
	% 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
Residential Real Estate Loans	0.00%	0.00%	13.28%	0.00%	52.02%	90.00%	34.70%	10.00%

Source: Loan Sample; 2010 U.S. Census data.

Within our sample, the bank did not originate any farm loans located in the moderate-income CTs in the AA. However, overall dispersion was reasonable given two of the moderate-income CTs are located in the Urbana city area, where farming is not as

prevalent. Furthermore, only 3.8 percent of farms in the AA are located in moderate income geographies.

Table 6 - Geographic Distribution of Loans to Farms in Non-MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans
Farm Loans	0.00%	0.00%	3.82%	0.00%	59.78%	65.00%	36.40%	35.00%

Source: Loan Sample; Dun and Bradstreet data as of June 2016; 2010 US Census.

Within our sample, the bank originated one business loan located in a moderate-income CT in the AA, which represents poor dispersion to the moderate-income CTs when compared to the percentage of AA businesses. However, there are only three moderate-income CTs in the AA, and two are located in the city of Urbana. Competition for loans in Urbana is strong. The third moderate-income CT is located in Logan County, and is not in close proximity to the bank's branches.

Table 7 - Geographic Distribution of Loans to Businesses in the Non-MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	0.00%	0.00%	21.11%	5.00%	45.82%	65.00%	33.07%	30.00%

Source: Loan Sample; Dun and Bradstreet data as of June 2016; 2010 US Census.

## Responses to Complaints

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

# Appendix A: Scope of Evaluation

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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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/2014 – 12/31/2016 Investment and Service Tests and CD Loans: Not Applicable	
<b>Financial Institution</b>		<b>Products Reviewed</b>
The First Central National Bank of St. Paris (FCNB) St. Paris, Ohio		Residential real estate, farm, and business loans.
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None reviewed.		
<b>List of Assessment Areas and Type of Evaluation</b>		
<b>Assessment Area</b>	<b>Type of Eval</b>	<b>Other Information</b>
Non-MSA AA	Full-Scope	

## Appendix B: Community Profiles for Full-Scope Areas

### Non-MSA AA

Demographic Information for Full-Scope Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	16	0.00%	18.75%	43.75%	37.50%	0.00%
Population by Geography	63,749	0.00%	15.87%	50.71%	33.42%	0.00%
Owner-Occupied Housing by Geography	18,891	0.00%	13.28%	52.02%	34.70%	0.00%
Businesses by Geography	2,634	0.00%	21.11%	45.82%	33.07%	0.00%
Farms by Geography	445	0.00%	3.82%	59.78%	36.40%	0.00%
Family Distribution by Income Level	17,784	18.07%	16.43%	22.09%	43.41%	0.00%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	6,135	0.00%	23.41%	53.14%	23.45%	0.00%
Median Family Income (Non-MSA Ohio)	= \$52,573	Median Housing Value Unemployment Rate (State of Ohio)				= 123,516
FFIEC Adjusted Median Family Income for 2016 (Non-MSA Ohio)	= \$55,400					= 5.4%
Households Below the Poverty Level	= 12.01%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 U.S. Census, and 2016 FFIEC updated MFI.

FCNB has designated one AA in Ohio, which is located in a non-MSA area. The Non-MSA AA consists of all the CTs in Champaign County, four CTs in the western section of Logan County, one CT in the southeastern part of Shelby County, and one CT in the eastern section of Miami County. The CT in Miami County is located in the Dayton, OH MSA 19380 area. The bank does a moderate level of lending in this CT. Additionally, this CT does not extend substantially beyond the non-MSA boundary. Therefore, it was included in the Non-MSA AA. All of the other CTs are located in non-MSA areas. Bank management selected this AA based on the bank's targeted lending territory and branch locations. The bank is headquartered in Champaign County and does most of its lending in this county. The CTs outside Champaign County include counties located near the bank's branches. FCNB maintains three offices including drive-thru facilities and two ATMs within the Non-MSA AA. The bank's primary market area is Champaign County. Urbana is the county seat of Champaign County.

Since the previous evaluation, the local economic conditions of the AA have improved and are stable, with the unemployment rates (not seasonally adjusted) in each county, other than Miami County, lower than the state (5.4 percent) and national (4.5 percent) levels, according to the Ohio Department of Job and Family Services – Bureau of Labor

Market Information as of June 2017. The unemployment rates for each county as of June 2017 were as follows: 4.4 percent in Champaign, Logan, and Shelby Counties and 4.6 percent in Miami County.

The AA has a diverse employer base across many industries from manufacturing and service industries to agriculture. Major employers in Champaign County include International Harvester, Honeywell International Inc., KTH Part Industries Inc., Johnson Welded Products., and Wal-Mart Stores, Inc. Major employers in Logan County include Honda Motor Company Ltd., Wal-Mart Stores Inc., and the local school systems. Major employers in Shelby County include Honda Motor Company Ltd. and Wal-Mart Stores, Inc. Major employers in Miami County include Goodyear Corp., Honda Motor Company Ltd., Meijer, Inc., and the local school system.

A community contact indicated that there continues to be a need for affordable housing in the AA and they expect that need to continue to grow. There is also a growing demand for utility and food assistance. According to the contact, local financial institutions are adequately meeting the credit and community development needs of the community.