



PUBLIC DISCLOSURE

March 18, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Liberty National Bank
Charter Number 5425

118 South Main Street
Ada, OH 45810

Office of the Comptroller of the Currency

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Westlake Center
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Cincinnati, OH 45242-3760

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

The Lending Test is rated: Outstanding.

The major factors supporting the outstanding rating for Liberty National Bank (hereafter “LNB” or “bank”) include:

- Lending to borrowers of different incomes and businesses of different sizes reflects excellent distribution.
- Geographic distribution of lending is excellent overall.
- The bank’s quarterly average loan-to-deposit (LTD) ratio is more than reasonable.
- LNB originates a majority of its loans inside its assessment areas (AAs).

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 MA/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 HUD 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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

Metropolitan Division (MD): 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 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 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 One 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

LNB is an intrastate community bank with total assets of \$338.9 million as of December 31, 2018. The bank is a wholly owned subsidiary of a one-bank holding company, Liberty Bancshares, Inc. Both the bank and holding company are headquartered in Ada, Ohio, approximately 80 miles northwest of Columbus, Ohio. The bank operates six full-service banking offices in Franklin, Hardin, Logan, and Union Counties. The main office is located in Ada, Ohio, in Hardin County. The five additional branches are located in Westerville, Kenton, Marysville, and Bellefontaine (two branches). All offices have a deposit-taking Automated Teller Machine (ATM) and drive-thru facilities. The bank operates one off-premise ATM at Ohio Northern University (McIntosh Center). All offices are open during normal business hours, and all offices except Westerville are open on Saturday mornings. The bank offers internet and mobile banking as well. As of the 2015 American Community Survey (ACS) U.S. Census Data, the Marysville, Kenton, and Bellefontaine South offices are in moderate-income census tracts (CTs), with the remaining offices in middle-income CTs. Since the prior CRA evaluation, the bank opened the Westerville office as a full-service branch in October 2016 and has not closed any offices.

LNB has two AAs in the State of Ohio. The AAs are contiguous, meet the requirements of the regulation, and do not arbitrarily exclude any low- and moderate-income CTs. Prior to opening the Westerville Branch in 2016, the bank's AA included Hardin and Logan counties (Non-MSA AA) and Union County in the Columbus, Ohio MSA 18140 (Columbus MSA AA). There were ten CTs in Union County and 18 CTs in Hardin and Logan Counties. We used this AA for our 2015 and 2016 analysis. The bank expanded the AA after the opening of the Westerville Branch to include 22 CTs in northern Franklin County and 15 CTs in southern Delaware County, which are located in the Columbus, Ohio MSA 18140. We used this AA for the 2017 analysis. Refer to Appendix B for specific details regarding both AAs.

LNB serves its community with traditional deposit accounts and loans. As of December 31, 2018, net loans totaled \$264.6 million, representing 78.1 percent of total assets. Tier 1 capital was \$43.1 million, or 12.7 percent of total assets for the same time period. The bank's loan originations and purchases by dollar volume during the lending evaluation period (2015 – 2017) are 70.2 percent commercial/commercial real estate, 17.0 percent home mortgage, 8.9 percent agricultural/farm, and 3.9 percent consumer. The bank's primary lending focus is commercial loans and commercial real estate loans to small businesses and home mortgage lending. LNB sells a majority of their home mortgage loan originations to the secondary market, but retains servicing.

The bank is responsive to the community development needs in the AAs. In addition to traditional mortgage products, the bank participates in the Federal Home Loan Bank's Welcome Home Grant Program which is designed to remove down-payment and closing cost obstacles for low- and moderate-income residents. The bank participates in State of Ohio Treasury programs to assist borrowers including: GrowNow, Eco-Link, and Ag Link. The bank offers Small Business Administration (SBA) guaranteed loans

and U.S. Department of Agriculture (USDA)/Guaranteed Rural Housing loans. The bank has a first-time homebuyer loan product in which the bank waives the processing fee if the customer pays closing costs. In addition to the above loan products, LNB is involved in many community development opportunities through donations and/or employees serving the organizations with financial expertise. Some of the organizations include Hardin County Habitat for Humanity, Hardin Metropolitan Housing, and United Way. The bank partners with EverFi Financial Literacy to bring a financial literacy program to local schools at no cost to the schools or taxpayers.

Competition in the AA is strong with state and national banks, savings associations, and branches of larger financial institutions. Financial institutions with significant deposit activity in the Non-MSA AA include LNB, Huntington National Bank, and Citizens Federal Savings and Loan Association. LNB has the largest deposit market share at 24.0 percent among the 18 financial institutions accepting deposits in the Non-MSA AA. In the Columbus MSA AA, the bank's market share is less than one percent. Financial institutions with significant deposit activity in the Columbus MSA AA include Huntington National Bank and JPMorgan Chase Bank, National Association. The deposit market share information is obtained from the June 30, 2018, Federal Deposit Insurance Corporation's (FDIC's) Deposit Market Share Reports.

There are no financial, legal, or other factors that impede LNB's ability to help meet the credit needs of its AA. LNB's previous CRA rating was "satisfactory" as of the CRA Performance Evaluation (PE) dated January 18, 2016.

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 the small bank CRA evaluation procedures to assess the bank's performance. Small business and home mortgage loans are the bank's primary lending products and were evaluated under the Lending Test. We analyzed lending activity in full-year increments during the lending evaluation period, January 1, 2015 to December 31, 2017. The review included all home mortgage loans reported in the HMDA Loan Application Registers for 2015, 2016, and 2017. We completed transaction testing on a random sample of small business loans for each year in the lending evaluation period and for each AA. For the lending in the AA analysis, we selected 20 small business loans for each year in the lending evaluation period, totaling 60 loans. For the borrower and geographic distribution analyses, we added loans to ensure at least 20 loans per AA (or all if less than 20) and per analysis period (the 2015 – 2016 evaluation period and the 2017 evaluation period).

Due to changes in demographic information during the lending evaluation period, we used the 2010 U.S. Census data for analysis and comparison purposes for loans

originated/purchased in 2015 and 2016 and the 2015 ACS U.S. Census data for loans originated/purchased in 2017.

Data Integrity

We completed a data integrity examination of the bank's home mortgage loans, as reported in the HMDA Loan Application Registers (2015 – 2017), to determine the accuracy of the data. We found the data was accurate and reliable for CRA analysis purposes and was used in its entirety in this evaluation. We completed transaction testing on a random sample of small business loans. We reviewed source documentation for each loan in the sample and did not note any substantive deficiencies in the data provided.

Selection of Areas for Full-Scope Review

We completed a full-scope review for both of the bank's AAs, the Non-MSA AA and the Columbus MSA AA. Refer to the table in Appendices A for additional information.

Ratings

LNB's overall rating is based on the full-scope reviews of both AAs, the Non-MSA AA and the Columbus MSA AA. We placed greater weight on the performance in the Non-MSA AA, as the majority of the bank's loans are in this AA and four of the six branches are located in the Non-MSA AA. According to internal bank reports, there were 1,076 loans (84.9 percent) originated in the Non-MSA AA and 191 loans (15.1 percent) originated in the Columbus MSA AA from January 1, 2015 to December 31, 2018. According to the FDIC's Deposit Market Share Report as of June 30, 2018, approximately 93.1 percent of the deposits are in the Non-MSA AA. In addition, we considered that 70.2 percent of the loan originations during the lending evaluation period were commercial/commercial real estate loans.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 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

LNB's lending performance is outstanding.

Loan-to-Deposit Ratio

LNB's quarterly average LTD ratio is more than reasonable given its size, financial condition, and AA credit needs. The bank's quarterly average LTD ratio over the 13 quarters since the prior CRA evaluation (December 2015 to December 2018) is 84.3 percent. The ratio ranged from a high of 95.5 percent at December 31, 2018, to a low of 76.2 percent at March 31, 2017. We evaluated LNB's average LTD ratio by comparing it to local competitors, which included banks with branches in the AA with total assets less than \$1 billion. The quarterly average LTD ratio for similarly situated financial institutions in the AA is 71.6 percent, and LNB's quarterly average LTD ratio of 84.3 percent compares favorably with peer.

Lending in Assessment Area

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	366	72.5	139	27.5	505	55,987	67.8	26,593	32.2	82,580
Small Business	37	61.7	23	38.3	60	3,815	63.9	2,158	36.1	5,973
Total	403	71.3	162	28.7	565	59,802	67.5	28,751	32.5	88,553

*Source: 1/1/2015 - 12/31/2017 Bank Data; 2015, 2016, and 2017 HMDA data; sample of 60 small business loans during lending evaluation period (20 per year).
Due to rounding, totals may not equal 100.0*

LNB originated a majority of its loans inside the AAs during our lending evaluation period, with 71.3 percent by number volume within the AAs. The bank's primary lending products are home mortgage and small business. Table D above details the bank's lending inside the AAs during the lending evaluation period.

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

Lending to borrowers of different incomes and businesses of different sizes reflects excellent distribution.

Refer to Table P and R in Appendix C and the community profiles in Appendix B for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

Non-MSA AA

Lending to borrowers of different incomes and businesses of different sizes in the Non-MSA AA reflects excellent distribution.

The bank's home mortgage lending to low- and moderate-income borrowers in the Non-MSA AA is excellent overall. The bank's lending to low-income borrowers is reasonable, as it exceeds aggregate lending data in 2015 and 2016, but falls slightly below aggregate lending data in 2017. The bank's lending to moderate-income families is excellent, as LNB's lending to moderate-income borrowers exceeds aggregate peer lending data and the percentage of moderate-income families in the AA during the lending evaluation period.

We note that the poverty rate for families below the poverty level in 2015/2016 and 2017, 10.5 percent and 11.9 percent respectively, may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards. We also consider the median price of housing in the AA relative to the maximum income of borrowers in the low-income category, which may demonstrate a barrier to homeownership. Refer to appendix B for more details on median price of housing.

The bank's lending to small businesses of different sizes in the Non-MSA AA is excellent. LNB originates a significantly higher percentage of loans to small businesses with total gross annual revenues less than \$1 million than aggregate peer lending data in each year of our lending evaluation period. We note that the majority of businesses within the Non-MSA AA have total gross annual revenues less than \$1 million which increases small business lending opportunities.

Columbus MSA AA

Lending to borrowers of different incomes and businesses of different sizes in the Columbus MSA AA reflects excellent distribution overall, with more weight placed on the bank's small business lending.

The bank's home mortgage lending to low- and moderate-income borrowers in the Columbus MSA AA is reasonable overall. The bank originated four home mortgage loans inside the Columbus MSA AA in 2017, which is not sufficient to provide a meaningful analysis. The bank's lending to low-income borrowers in 2015 and 2016 falls below aggregate lending data, but is considered reasonable overall. Lending to moderate-income borrowers in 2015 and 2016 is excellent, as LNB's home mortgage lending exceeds aggregate lending data and the percentage of moderate-income families in the AA. We note that the 5.1 percent poverty rate for families below the poverty level in 2015 – 2016 may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards. We also consider the median price of housing in the AA relative to the maximum income of

borrowers in the low-income category, which may demonstrate a barrier to homeownership. Refer to appendix B for more details on median price of housing.

The bank's lending to small businesses of different sizes in the Columbus MSA AA is excellent. LNB originates a significantly higher percentage of loans to small businesses with total gross annual revenues less than \$1 million than aggregate lending data in each year of our lending evaluation period. We note that the majority of businesses within the Columbus MSA AA have total gross annual revenues less than \$1 million which increases small business lending opportunities.

Geographic Distribution of Loans

LNB's geographic distribution of loans is excellent overall. There are no low-income CTs in either of the bank's AAs. As of the 2010 U.S. Census data, the bank had three moderate-income CTs in the Non-MSA AA and one in the Columbus MSA AA. As of the 2015 ACS U.S. Census data, the bank has four moderate-income CTs in the Non-MSA AA and three in the Columbus MSA AA. The moderate-income CTs are located within or near the cities of Ada, Kenton, Bellefontaine, Russells Point, Marysville, Delaware, and Worthington, Ohio. The majority of both AAs are middle- and upper-income areas. The lending analysis reflects lending in most areas, with no conspicuous gaps in lending.

We place more weight on the bank's lending in the Non-MSA AA, as 85 percent of loan originations/purchases are in the Non-MSA AA. In addition, internal bank reports indicate that 27.2 percent of small business loan originations/purchases inside the Non-MSA AA from January 1, 2015 to December 31, 2018 are in moderate-income CTs (Internal Bank Report - CRA Performance Review Report, dated February 27, 2019). This reflects favorably with aggregate lending data.

Refer to Table O and Q in appendix C and the community profiles in appendix B for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

Non-MSA AA

LNB's geographic distribution of loans in the Non-MSA AA is excellent overall.

The bank's geographic distribution of home mortgage lending reflects excellent distribution. LNB's lending in the three moderate-income CTs in 2015 and 2016 exceeds the aggregate peer lending data and is commensurate with the percentage of owner-occupied housing units in moderate-income CTs. In 2017, lending in the four moderate-income CTs exceeds both aggregate lending data and the percentage of owner-occupied housing units in moderate-income tracts, reflecting excellent distribution.

The bank's geographic distribution of small business lending reflects excellent distribution overall. LNB's lending in 2015 and 2016 in the moderate-income tracts exceeds aggregate lending data, with a sample of 40 loans. In 2017, the percentage of bank loans originated in the moderate-income CTs falls slightly below aggregate lending data, reflecting reasonable distribution, with a sample of 20 loans. We place more weight on the 2015 and 2016 analysis which includes a larger loan sample.

Columbus MSA AA

LNB's geographic distribution of loans in the Columbus MSA AA is reasonable overall.

The bank's geographic distribution of home mortgage lending reflects reasonable distribution. The bank originated four home mortgage loans inside the Columbus MSA AA in 2017, which is not sufficient to provide a meaningful analysis. LNB's lending in the moderate-income CTs in 2015 and 2016 falls below aggregate lending data and the percentage of owner-occupied housing units in moderate-income tracts, but is reasonable overall. LNB originated 33 home mortgage loans in 2015-2016 and four loans in 2017, which is consistent with the bank's strategy to primarily penetrate the commercial lending market in the Columbus MSA AA.

The bank's geographic distribution of small business lending is reasonable overall. LNB did not originate any small business loans in 2015 and 2016 in the moderate-income tracts, reflecting poor distribution. We sampled all 14 small business loans originated in 2015-2016 in the Columbus MSA AA. LNB's lending in 2017 exceeds aggregate lending data and the percentage of small businesses in moderate-income tracts, reflecting excellent distribution. The poor distribution in 2015-2016 can be partially explained by having limited lending opportunities in Union County, whereas in 2017 the bank added portions of Delaware and Franklin Counties to the Columbus MSA AA, significantly increasing lending opportunities.

Responses to Complaints

LNB has not received any complaints about its performance in helping to meet the credit needs of its AAs during the lending evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/2015 – 12/31/2017 Investment and Service Tests and CD Loans: Not applicable (N/A)	
Financial Institution	Products Reviewed	
Liberty National Bank (LNB) Ada, Ohio	Home Mortgage Loans Small Business Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Columbus, OH MSA 18140 Union County Franklin County Delaware County	Full-Scope	The bank’s Columbus, OH MSA 18140 AA includes all of Union County, northern Franklin County (22 CTs), and southern Delaware County (15 CTs).
Non-MSA in State of Ohio Hardin County Logan County	Full-Scope	The Non-MSA AA includes Hardin and Logan Counties in their entirety.

Appendix B: Community Profiles for Full-Scope Areas

LNB designated two AAs in the State of Ohio, the Non-MSA AA and the Columbus MSA AA. The bank selected the AAs based on their targeted lending area and office locations. The AAs are contiguous, meet the requirements of the regulation, and do not arbitrarily exclude any low- and moderate-income CTs. Prior to opening the Westerville Branch in 2016, the bank's AA included Hardin and Logan counties (Non-MSA AA) and Union County in the Columbus, Ohio MSA 18140 (Columbus MSA AA). There were ten CTs in Union County and 18 CTs in Hardin and Logan Counties. We used this AA for our 2015 and 2016 analysis. The bank expanded the AA after the opening of the Westerville Branch to include 22 CTs in northern Franklin County and 15 CTs in southern Delaware County, as well as the AA discussed above. Both Franklin and Delaware counties are located in the Columbus, Ohio MSA 18140. We used this AA for the 2017 analysis.

The underlying demographics changed in 2015 due to the American Community Survey (ACS). Our 2015 and 2016 analysis used the 2010 U.S. Census demographics. Our 2017 analysis used the 2015 ACS Census demographics. The 2015 ACS Census data resulted in changes to the CT classifications.

As part of this CRA evaluation, we conducted interviews with representatives from a local affordable housing organization and organizations that provide services to low- and moderate-income individuals. Affordable housing is a credit need in the community. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Non-MSA AA

Table A – Demographic Information of the Assessment Area – 2015/2016						
Assessment Area: Non-MSA AA (Hardin and Logan Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	16.7	66.7	16.7	0.0
Population by Geography	77,916	0.0	14.2	65.6	20.2	0.0
Housing Units by Geography	36,266	0.0	16.2	67.4	16.4	0.0
Owner-Occupied Units by Geography	21,613	0.0	11.7	69.8	18.5	0.0
Occupied Rental Units by Geography	8,553	0.0	26.7	56.6	16.7	0.0
Vacant Units by Geography	6,100	0.0	17.8	73.8	8.4	0.0
Businesses by Geography	3,348	0.0	19.8	63.0	17.2	0.0
Farms by Geography	439	0.0	2.7	76.1	21.2	0.0
Family Distribution by Income Level	20,578	20.1	16.4	23.2	40.4	0.0
Household Distribution by Income Level	30,166	23.0	16.1	17.8	43.2	0.0
Median Family Income Non-MSAs - OH		\$52,573	Median Housing Value			\$113,427
FFIEC Estimated MFI Non-MSA – OH – 2015		\$56,900	Median Gross Rent			\$624
FFIEC Estimated MFI Non-MSA – OH – 2016		\$55,400	Families Below Poverty Level			10.5%
<i>Source: 2010 U.S. Census and 2016 D&B Data; 2015 and 2016 FFIEC Updated Non-MSA MFI for the State of Ohio. Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area – 2017

Assessment Area: Non-MSA AA (Hardin and Logan Counties)

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	22.2	55.6	22.2	0.0
Population by Geography	77,220	0.0	18.6	60.0	21.4	0.0
Housing Units by Geography	36,271	0.0	21.0	60.0	19.0	0.0
Owner-Occupied Units by Geography	21,910	0.0	16.5	58.4	25.1	0.0
Occupied Rental Units by Geography	8,270	0.0	28.6	59.1	12.3	0.0
Vacant Units by Geography	6,091	0.0	26.8	66.8	6.3	0.0
Businesses by Geography	3,310	0.0	23.4	56.9	19.8	0.0
Farms by Geography	438	0.0	11.9	55.0	33.1	0.0
Family Distribution by Income Level	20,419	19.9	17.8	21.8	40.6	0.0
Household Distribution by Income Level	30,180	21.9	16.0	19.3	42.9	0.0
Median Family Income (MFI) Non-MSAs - OH		\$56,217	Median Housing Value			\$109,868
FFIEC Estimated MFI Non-MSA – OH - 2017		\$57,600	Median Gross Rent			\$665
			Families Below Poverty Level			11.9%

Source: 2015 ACS Census and 2017 D&B Data; 2017 FFIEC Updated Non-MSA MFI for the State of Ohio.

Due to rounding, totals may not equal 100.0.

() The NA category consists of geographies that have not been assigned an income classification.*

The Non-MSA AA includes Hardin and Logan counties, in their entirety. As of the 2010 U.S. Census data, there were three moderate-income CTs, 12 middle-income CTs, and three upper-income CTs in the Non-MSA AA. As of the 2015 ACS U.S. Census data, there were four moderate-income CTs, ten middle-income CTs, and four upper-income CTs in the Non-MSA AA. There were several CT changes as a result of the 2015 ACS Census. In Hardin County, CT 5 changed from middle-income to moderate-income in the 2015 ACS Census. There were also changes in the middle- and upper-income CTs.

Economics conditions in the Non-MSA AA are stable overall. As of December 2018, the “not seasonally adjusted” unemployment rates for Hardin and Logan counties are 4.5 and 4.4 percent, respectively. These are lower than the State of Ohio’s unemployment rate of 4.8 percent, and slightly higher than the national rate of 3.7 percent. The source of the unemployment data was from the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information, as of December 2018.

The AA has a diverse mix of companies across many industries, including manufacturing and education. Large employers in Hardin County include International Paper, Ohio Northern University, and Ada Technologies, Inc. Large employers in Logan County include Honda of America Mfg., Honda Transmission Mfg., and Logan County government.

According to the 2010 U.S. Census data, the median housing value in the Non-MSA AA was \$113,427. Based on the 2016 median family income of \$55,400, low-income families make less than \$27,700 and moderate-income families make less than \$44,320. Overall median housing values are approximately 2.6 to 4.1 times the annual income of low- and moderate-

income families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some low- and moderate-income families. There are 36,266 total housing units in the AA, of which 59.6 percent are owner-occupied and 23.6 percent are rental occupied units. Approximately 10.5 percent of the families are below the poverty level.

According to the 2015 ACS U.S. Census data, the median housing value in the Non-MSA AA was \$109,868. Based on the 2017 median family income of \$57,600, low-income families make less than \$28,800 and moderate-income families make less than \$46,080. Overall median housing values are approximately 2.4 to 3.8 times the annual income of low- and moderate-income families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some low- and moderate-income families. There are 36,271 total housing units in the AA, of which 60.4 percent are owner-occupied and 22.8 percent are rental occupied units. About 11.9 percent of the families are below the poverty level.

Columbus MSA AA

Table A – Demographic Information of the Assessment Area – 2015/2016						
Assessment Area: Columbus MSA AA (Union County)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	10.0	40.0	50.0	0.0
Population by Geography	52,300	0.0	10.1	41.8	48.1	0.0
Housing Units by Geography	19,129	0.0	13.9	41.5	44.6	0.0
Owner-Occupied Units by Geography	13,824	0.0	6.8	39.0	54.2	0.0
Occupied Rental Units by Geography	4,002	0.0	34.0	50.4	15.6	0.0
Vacant Units by Geography	1,303	0.0	26.8	40.8	32.5	0.0
Businesses by Geography	2,776	0.0	13.3	34.0	52.7	0.0
Farms by Geography	325	0.0	3.1	41.8	55.1	0.0
Family Distribution by Income Level	13,215	13.7	14.0	22.2	50.1	0.0
Household Distribution by Income Level	17,826	16.5	12.6	16.4	54.5	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$64,914	Median Housing Value			\$186,423
FFIEC MFI Columbus, OH MSA 18140 – 2015		\$71,000	Median Gross Rent			\$738
FFIEC MFI Columbus, OH MSA 18140 – 2016		\$69,100	Families Below Poverty Level			5.1%

*Source: 2010 U.S. Census and 2016 D&B Data; 2015 and 2016 FFIEC Updated Columbus MSA 18140 MFI.
Due to rounding, totals may not equal 100.0.
(*) The NA category consists of geographies that have not been assigned an income classification.*

Table A – Demographic Information of the Assessment Area – 2017						
Assessment Area: Columbus MSA AA (Union County, parts of Franklin and Delaware Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	0.0	6.4	29.8	63.8	0.0
Population by Geography	265,954	0.0	5.7	27.3	67.0	0.0
Housing Units by Geography	104,189	0.0	6.5	27.2	66.3	0.0
Owner-Occupied Units by Geography	69,873	0.0	4.8	24.1	71.1	0.0
Occupied Rental Units by Geography	29,078	0.0	9.9	32.9	57.1	0.0
Vacant Units by Geography	5,238	0.0	10.0	36.6	53.4	0.0
Businesses by Geography	19,481	0.0	5.5	23.9	70.6	0.0
Farms by Geography	595	0.0	11.4	40.5	48.1	0.0
Family Distribution by Income Level	68,978	10.1	11.8	17.2	60.9	0.0
Household Distribution by Income Level	98,951	11.8	12.1	15.2	60.9	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$229,404
FFIEC MFI Columbus, OH MSA 18140 – 2015		\$73,900	Median Gross Rent			\$994
			Families Below Poverty Level			3.9%
<i>Source: 2015 ACS Census and 2017 D&B Data; 2017 FFIEC Updated Columbus MSA 18140 MFI.</i>						
<i>Due to rounding, totals may not equal 100.0.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Prior to opening the Westerville Branch in late 2016, the bank’s Columbus MSA AA included Union County in the Columbus, Ohio MSA 18140. As of the 2010 U.S. Census, there were ten CTs in Union County, with one moderate-income CT, four middle-income CTs, and five upper-income CTs. We used this AA for our 2015 and 2016 analysis of the Columbus MSA AA.

The bank expanded the AA after opening the Westerville Branch, and now includes 22 CTs in northern Franklin County, 15 CTs in southern Delaware County, and all CTs in Union County. All three counties are located in the Columbus, Ohio MSA 18140. As of the 2015 ACS U.S. Census, there are three moderate-income CTs, 14 middle-income CTs, and 30 upper-income CTs. We used this AA for the 2017 analysis.

Economics conditions in the Columbus MSA AA are stable overall. As of December 2018, the “not seasonally adjusted” unemployment rates were 3.7 percent for Union County, 3.5 percent for Delaware County, and 3.9 percent for Franklin County. These are lower than the State of Ohio’s unemployment rate of 4.8 percent, and commensurate with the national rate of 3.7 percent. The source of the unemployment data was from the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information, as of December 2018.

The AA has a diverse mix of companies across many industries, including manufacturing, education, and health services. Large employers in Union County include the Union County Schools, Tyson Foods Inc., and ATI Specialty Materials. Large employers in Delaware County include JP Morgan Chase and the Kroger Company. Large employers in Franklin County

include The Ohio State University, State of Ohio government, Ohio Health, U.S. government, and JP Morgan Chase.

According to the 2010 U.S. Census data, the median housing value in the Columbus MSA AA was \$186,423. Based on the 2016 median family income of \$69,100, low-income families make less than \$34,550 and moderate-income families make less than \$55,280. Overall median housing values are approximately 3.4 to 5.4 times the annual income of low- and moderate-income families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some low- and moderate-income families. There are 19,129 total housing units in the AA, of which 72.3 percent are owner-occupied and 20.9 percent are rental occupied units. Approximately 5.1 percent of the families are below the poverty level.

According to the 2015 ACS U.S. Census data, the median housing value in the Columbus MSA AA was \$229,404. Based on the 2017 median family income of \$73,900, low-income families make less than \$36,950 and moderate-income families make less than \$59,120. Overall median housing values are approximately 3.9 to 6.2 times the annual income of low- and moderate-income families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some low- and moderate-income families. There are 104,189 total housing units in the AA, of which 67.1 percent are owner-occupied and 27.9 percent are rental occupied units. About 3.9 percent of the families are below the poverty level.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data is not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography – The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data is not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues – Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.

Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout those geographies.

Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MA/assessment area.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Non-MSA AA	226	29,803	100.0	1,715	0.0	0.0	0.0	11.7	11.5	10.7	69.8	63.3	71.6	18.5	25.2	17.7	0.0	0.0	0.0
Total	226	29,803	100.0	1,715	0.0	0.0	0.0	11.7	11.5	10.7	69.8	63.3	71.6	18.5	25.2	17.7	0.0	0.0	0.0

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Non-MSA AA	93	10,986	100.0	1,679	0.0	0.0	0.0	16.5	19.4	16.8	58.4	67.7	60.5	25.1	12.9	22.7	0.0	0.0	0.0
Total	93	10,986	100.0	1,679	0.0	0.0	0.0	16.5	19.4	16.8	58.4	67.7	60.5	25.1	12.9	22.7	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-16	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Columbus MSA AA	33	12,304	100.0	2,749	0.0	0.0	0.0	6.8	6.1	9.0	39.0	36.4	26.6	54.2	57.6	64.4	0.0	0.0	0.0	
Total	33	12,304	100.0	2,749	0.0	0.0	0.0	6.8	6.1	9.0	39.0	36.4	26.6	54.2	57.6	64.4	0.0	0.0	0.0	

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Columbus MSA AA	4	849	100.0	10,325	0.0	0.0	0.0	4.8	0.0	4.4	24.1	50.0	22.8	71.1	50.0	72.8	0.0	0.0	0.0	
Total	4	849	100.0	10,325	0.0	0.0	0.0	4.8	0.0	4.4	24.1	50.0	22.8	71.1	50.0	72.8	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Non-MSA AA	226	29,803	100.0	1,715	20.1	7.1	5.8	16.4	20.8	18.6	23.2	23.9	23.9	40.4	40.7	37.1	0.0	7.5	14.6
Total	226	29,803	100.0	1,715	20.1	7.1	5.8	16.4	20.8	18.6	23.2	23.9	23.9	40.4	40.7	37.1	0.0	7.5	14.6

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Non-MSA AA	93	10,986	100.0	1,679	19.9	6.5	7.2	17.8	24.7	21.7	21.8	18.3	23.1	40.6	43.0	33.7	0.0	7.5	14.3
Total	93	10,986	100.0	1,679	19.9	6.5	7.2	17.8	24.7	21.7	21.8	18.3	23.1	40.6	43.0	33.7	0.0	7.5	14.3

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbus MSA AA	33	12,304	100.0	2,749	13.7	3.0	4.1	14.0	15.2	12.2	22.2	18.2	20.0	50.1	45.5	52.7	0.0	18.2	11.0
Total	33	12,304	100.0	2,749	13.7	3.0	4.1	14.0	15.2	12.2	22.2	18.2	20.0	50.1	45.5	52.7	0.0	18.2	11.0

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbus MSA AA	4	849	100.0	10,325	10.1	0.0	2.7	11.8	0.0	11.7	17.2	25.0	19.5	60.9	50.0	53.0	0.0	25.0	13.1
Total	4	849	100.0	10,325	10.1	0.0	2.7	11.8	0.0	11.7	17.2	25.0	19.5	60.9	50.0	53.0	0.0	25.0	13.1

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-16	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Non-MSA AA	40	7,044	100.0	654	0.0	0.0	0.0	19.2	15.0	14.4	63.4	62.5	71.3	17.4	22.5	14.4	0.0	0.0	0.0	
Total	40	7,044	100.0	654	0.0	0.0	0.0	19.2	15.0	14.4	63.4	62.5	71.3	17.4	22.5	14.4	0.0	0.0	0.0	

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" is based on a sample of 40 small business loans.
**The "Overall Market" includes only loans reported by CRA-reporting lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Non-MSA AA	20	2,193	100.0	688	0.0	0.0	0.0	23.4	15.0	16.4	56.9	65.0	59.3	19.8	20.0	24.3	0.0	0.0	0.0	
Total	20	2,193	100.0	688	0.0	0.0	0.0	23.4	15.0	16.4	56.9	65.0	59.3	19.8	20.0	24.3	0.0	0.0	0.0	

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" is based on a sample of 20 small business loans.
**The "Overall Market" includes only loans reported by CRA-reporting lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015-16**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbus MSA AA	14	1,695	100.0	849	0.0	0.0	0.0	13.4	0.0	12.4	34.1	57.1	21.3	52.6	42.9	66.3	0.0	0.0	0.0
Total	14	1,695	100.0	849	0.0	0.0	0.0	13.4	0.0	12.4	34.1	57.1	21.3	52.6	42.9	66.3	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" is based on a sample of 14 small business loans.
 **The "Overall Market" includes only loans reported by CRA-reporting lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbus MSA AA	16	2,565	100.0	5,472	0.0	0.0	0.0	5.5	12.5	3.9	23.9	62.5	20.8	70.6	25.0	75.3	0.0	0.0	0.0
Total	16	2,565	100.0	5,472	0.0	0.0	0.0	5.5	12.5	3.9	23.9	62.5	20.8	70.6	25.0	75.3	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" is based on a sample of 16 small business loans.
 **The "Overall Market" includes only loans reported by CRA-reporting lenders.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2015-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Non-MSA AA	40	7,044	100.0	654	77.8	72.5	43.7	5.8	27.5	16.4	0.0
Total	40	7,044	100.0	654	77.8	72.5	43.7	5.8	27.5	16.4	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" is based on a sample of 40 small business loans.

**The "Overall Market" includes only loans reported by CRA-reporting lenders.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Non-MSA AA	20	2,193	100.0	688	76.8	70.0	43.5	6.3	30.0	16.9	0.0
Total	20	2,193	100.0	688	76.8	70.0	43.5	6.3	30.0	16.9	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" is based on a sample of 20 small business loans.

**The "Overall Market" includes only loans reported by CRA-reporting lenders.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2015-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus MSA AA	14	1,695	100.0	849	80.3	92.9	38.9	7.3	7.1	12.3	0.0
Total	14	1,695	100.0	849	80.3	92.9	38.9	7.3	7.1	12.3	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" is based on a sample of 14 small business loans.

**The "Overall Market" includes only loans reported by CRA-reporting lenders.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus MSA AA	16	2,565	100.0	5,472	83.3	75.0	52.0	6.1	25.0	10.5	0.0
Total	16	2,565	100.0	5,472	83.3	75.0	52.0	6.1	25.0	10.5	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

*Percentages used for "Bank Loans" is based on a sample of 16 small business loans.

**The "Overall Market" includes only loans reported by CRA-reporting lenders.