



## **PUBLIC DISCLOSURE**

September 30, 2019

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

Kingston National Bank  
Charter Number 9536

2 North Main Street  
Kingston, OH 45644

Office of the Comptroller of the Currency

Central Ohio Field Office  
Westlake Center  
4555 Lake Forest Drive, Suite 520  
Cincinnati, OH 45242

**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

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on the State of Ohio rating, which is Satisfactory. The bank exhibits a reasonable distribution of loans to individuals of different income levels, and businesses and farms of different sizes.
- Additionally, the bank's performance relative to the activities considered at the bank-wide level is overall reasonable. These include:
  - The bank's loan-to-deposit (LTD) ratio is reasonable
  - A substantial majority of the bank's loans are inside the assessment areas (AAs)

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit ratio is reasonable.

The bank's quarterly average LTD ratio over the 23 quarters since the previous CRA evaluation (December 2013 – June 2019) is 75.5 percent. The ratio ranged from a low of 66.9 percent at March 31, 2016, to a high of 80.9 percent at December 31, 2018. The bank's average LTD ratio of 75.5 percent is reasonable when compared to the average LTD ratio of 84.7 percent of similarly situated financial institutions in the bank's AAs with total assets less than \$500 million.

### Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs.

The bank originated and purchased 81.2 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. Almost 55 percent of the bank's loan originations and purchases (by number originated and purchased) during the evaluation period were business and farm loans, with 87.5 percent of business and farm loans in our sample inside the AAs.

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	361	80.0	90	20.0	451	46,486	74.0	16,370	26.0	62,856
Small Business	35	87.5	5	12.5	40	3,758	81.0	882	19.0	4,640
Small Farm	35	87.5	5	12.5	40	3,390	85.0	599	15.0	3,989
Total	431	81.2	100	18.8	531	53,634	75.0	17,851	25.0	71,485

*Source: 2016 – 2018 HMDA Data; small business and small farm loan samples. Due to rounding, totals may not equal 100.0.*

## Description of Institution

Kingston National Bank (KNB or bank) is a wholly owned subsidiary of Kingston Bancshares, Inc. As of June 30, 2019, the bank had \$364.4 million in total assets and \$30.6 million in tier 1 capital. The bank's main office in Kingston, Ohio is located approximately 50 miles southeast of Columbus, Ohio in Ross County, and is in an upper-income census tract (CT). The bank has five other branch locations in Ohio. The Adelphi and Chillicothe branches are in Ross County in middle-and upper-income CTs. KNB's Amanda branch in Fairfield County is in a moderate-income CT as of the 2015 American Community Survey (ACS) U.S. Census data. The bank has two branches in Pickaway County, the South Bloomfield and Circleville branches. The South Bloomfield branch is in a middle-income CT and the Circleville branch is in a moderate-income CT. The Circleville opened July 30, 2018. No offices have been closed since the prior CRA evaluation in 2014. All offices have drive-up facilities and automated teller machines (ATMs). The bank also offers online and mobile banking. There was no merger or acquisition activity during the evaluation period.

KNB has two AAs located in the state of Ohio, which is the bank's only rating area. The first AA includes all of Ross County, Ohio, which is in a non-metropolitan statistical area (Non-MSA AA). The bank's second AA is in the Columbus, OH MSA 18140 and includes Pickaway County, in its entirety, CTs 325 and 326 in Fairfield County, and CT 9650 in Hocking County (MSA AA).

KNB serves its community with traditional deposit accounts and loan products. As of June 30, 2019, the bank's net loans and leases totaled \$249.6 million, or 68.5 percent of total assets. Based on the number of loans originated and purchased during the evaluation period (2016 – 2018), residential real estate (home mortgage) accounted for 16.5 percent, commercial and commercial real estate (small business) accounted for 23.7 percent, farms accounted for 31.1 percent, and consumer loans accounted for 28.7 percent. Based on the dollar amount of loans originated and purchased, home mortgages accounted for 18.9 percent, small businesses accounted for 32.6 percent, farms accounted for 45.6 percent, and consumer loans accounted for 2.9 percent. The bank's primary lending focus is farm, business, and home mortgage lending. Additionally, the bank is a home mortgage broker for Franklin American Mortgage Company and brokered 15 loans totaling \$2.3 million in year-to-date 2019. These loans did not close in the bank's name.

There are no financial, legal, or other factors that impede KNB's ability to help meet the credit needs of its AAs. KNB's previous CRA rating was Satisfactory as of the CRA Performance Evaluation (PE) dated January 21, 2014.

## 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 (LMI) areas. We used the small bank CRA evaluation procedures to assess the bank's performance. The bank met the requirements for the small bank CRA evaluation procedures with total assets less than \$321 million for at least one of the prior two calendar years, December 31, 2017 and December 31, 2018 (\$304.8 million and \$350.9 million, respectively). Based on discussions with bank management and the number and dollar volume of loan origination data supplied by the bank, home mortgage, small business, and farm 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 evaluation period, January 1, 2016 to December 31, 2018. The review included all home mortgage loans reported in the HMDA Loan Application Registers (LARs) for 2016, 2017, and 2018. We completed transaction testing on a random sample of small loans to businesses and farms originated during the evaluation period for each AA. For the Lending Test, we selected 20 small loans to businesses and farms originated in 2016 for each AA and 20 small loans to businesses and farms originated in 2017 – 2018 for each AA.

For analysis purposes, we compared the bank's lending performance with demographic data from the 2010 U.S. Census, the 2015 ACS U.S. Census, and the 2016 and 2018 Dun and Bradstreet (D&B) data. The income designation of several CTs in the AAs changed in 2017, based upon the 2015 ACS U.S. Census data. Due to changes in demographic information during the evaluation period, we used the 2010 U.S. Census data for loans originated and purchased in 2016 and the 2015 ACS U.S. Census data for loans originated and purchased in 2017 and 2018. We reviewed the 2016 loan data separately from the 2017 and 2018 loan data. No affiliate activity was included in this analysis. Refer to the table in appendix A for more information on the scope of the review.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, KNB has two AAs in the State of Ohio, and we completed a full-scope review of both AAs. A community profile for each AA is provided in the "Description of Institution's Operations in Ohio" in the State of Ohio section of this evaluation. Refer to the "Scope" section under the State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full-scope AAs.

### Ratings

The bank's overall rating is based on the State of Ohio rating. KNB only operates in the state of Ohio. The State of Ohio rating is based on the performance in all the bank's AAs. We completed a full-scope review of both AAs, the MSA AA and the Non-MSA AA. Refer to the "Scope" under the State Rating section for more details.

## **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 AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, 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.

## State Rating

### State of Ohio

**CRA rating for the State of Ohio:** Satisfactory.

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

The major factors that support this rating include:

- The bank exhibits a reasonable distribution of loans to individuals of different incomes and businesses and farms of different sizes.
- A substantial majority of the bank's loans are inside the bank's AA during the evaluation period.
- The LTD ratio is reasonable.

### Description of Institution's Operations in Ohio

KNB has two AAs located in the State of Ohio. The bank primarily lends within the AAs. Bank management selected the AAs based on their targeted lending area and office locations. The first AA includes all of Ross County, Ohio, which is in a non-metropolitan statistical area (Non-MSA AA). The second AA is in the Columbus, OH MSA 18140 and includes Pickaway County in its entirety, CTs 325 and 326 in Fairfield County, and CT 9650 in Hocking County (MSA AA). The AAs are contiguous, meet the requirements of the regulation, and do not arbitrarily exclude any LMI areas. The bank has six branch office locations in Ohio: Kingston, Adelphi, Chillicothe, Amanda, South Bloomfield, and Circleville. Chillicothe is the largest city and county seat in Ross County. Circleville is the largest city and county seat in Pickaway County.

The underlying demographics changed in 2017 due to the 2015 ACS U.S. Census. As of the 2010 U.S. Census data, the Non-MSA AA consisted of zero low-income, four moderate-income, ten middle-income, and three upper-income CTs. The MSA AA consisted of one low-income, three moderate-income, 11 middle-income, zero upper-income, and one CT without an income classification. As of the 2015 ACS U.S. Census data, the Non-MSA AA consisted of zero low-income, four moderate-income, ten middle-income, and three upper-income CTs. The MSA AA consisted of zero low-income, seven moderate-income, seven middle-income, one upper-income, and one CT without an income classification.

As part of this CRA evaluation, we reviewed information provided during interviews with representatives from affordable housing or community development organizations. The contacts identified affordable housing for LMI individuals as a credit need in the community. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Refer to the community profile for the State of Ohio AAs below for detailed demographics and other performance context information for each AA that received a full-scope review.

## Non-MSA AA

Economic conditions in the Non-MSA AA are stable. As of the August 2019 Office of Workforce Development/Bureau of Labor Market Information statistics data, Ross County has an unemployment rate (not seasonally adjusted) of 4.3 percent, which is slightly above the statewide unemployment rate of 4.2 percent and nationwide rate of 3.8 percent. Primary industries remain light manufacturing and agriculture. Large employers in the Non-MSA AA include Kenworth Truck Company, Pixelle Specialty Solutions, and Adena Health System.

Competition in the AA is strong with national banks, state banks, and branches of larger financial institutions. According to the Federal Deposit Insurance Corporation's (FDIC) June 30, 2019 Deposit Market Share Report, 70.0 percent of the bank's deposits are in the Non-MSA AA and 30.0 percent are in the MSA AA. According to the same report, KNB has the highest deposit market share out of nine financial institutions in the AA at 26.3 percent. Other financial institutions with significant deposit market share in Ross County include Vinton County National Bank, Huntington National Bank, PNC Bank, and LCNB National Bank. According to 2015 ACS U.S. Census data, the 2018 peer mortgage data (HMDA data) shows KNB with a 3.7 percent lending market share in the Non-MSA AA, which is 7<sup>th</sup> out of 152 financial institutions. Primary home mortgage lenders in the Non-MSA AA include Huntington National Bank, Hometown Lenders, Inc., WesBanco Bank, Inc., Vinton County National Bank, Fifth Third Mortgage Company, PNC Bank, and KNB.

According to 2010 U.S. Census data, the median housing value in the Non-MSA AA was \$111,341. 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 2.5 to 4.0 times the annual income of LMI families in the AA. Housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 31,875 total housing units in the AA, of which 64.7 percent are owner-occupied and 23.5 percent are rental units. Approximately 13.1 percent of the families and 15.5 percent of the households live below the poverty level.

According to 2015 ACS U.S. Census data, the median housing value in the Non-MSA AA was \$108,527. 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 LMI families in the AA. Based on the 2018 median family income of \$61,400, low-income families make less than \$30,700 and moderate-income families make less than \$49,120. Overall median housing values are approximately 2.2 to 3.5 times the annual income of LMI families in the AA. Housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 31,917 total housing units in the AA, of which 63.5 percent are owner-occupied and 25.1 percent are rental units. Approximately 14.0 percent of the families and 16.9 percent of the households live below the poverty level.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Kingston Non-MSA AA, 2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	17	0.0	23.5	58.8	17.6	0.0
Population by Geography	78,064	0.0	20.8	63.3	15.9	0.0
Housing Units by Geography	31,875	0.0	15.9	67.5	16.6	0.0
Owner-Occupied Units by Geography	20,609	0.0	10.9	70.4	18.7	0.0
Occupied Rental Units by Geography	7,498	0.0	24.5	61.5	13.9	0.0
Vacant Units by Geography	3,768	0.0	26.3	63.1	10.6	0.0
Businesses by Geography	3,408	0.0	35.9	50.3	13.8	0.0
Farms by Geography	215	0.0	6.0	75.3	18.6	0.0
Family Distribution by Income Level	19,366	21.0	20.4	21.1	37.4	0.0
Household Distribution by Income Level	28,107	24.0	16.5	17.8	41.7	0.0
Median Family Income Non-MSAs - OH		\$52,573	Median Housing Value			\$111,341
			Median Gross Rent			\$623
			Families Below Poverty Level			13.1%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data.</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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Kingston Non-MSA AA, 2017-2018</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	17	0.0	23.5	58.8	17.6	0.0
Population by Geography	77,334	0.0	21.0	62.6	16.5	0.0
Housing Units by Geography	31,917	0.0	22.5	60.9	16.5	0.0
Owner-Occupied Units by Geography	20,275	0.0	19.0	62.4	18.6	0.0
Occupied Rental Units by Geography	7,994	0.0	28.9	57.4	13.7	0.0
Vacant Units by Geography	3,648	0.0	28.3	60.6	11.2	0.0
Businesses by Geography	3,417	0.0	39.2	47.0	13.8	0.0
Farms by Geography	232	0.0	22.0	59.9	18.1	0.0
Family Distribution by Income Level	19,608	22.9	18.7	20.1	38.2	0.0
Household Distribution by Income Level	28,269	24.4	17.1	18.1	40.4	0.0
Median Family Income Non-MSAs - OH		\$56,217	Median Housing Value			\$108,527
			Median Gross Rent			\$670
			Families Below Poverty Level			14.0%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data.</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>						

## MSA AA

Economic conditions in the MSA AA are overall stable. As of the August 2019 Office of Workforce Development/Bureau of Labor Market Information statistics data, the unemployment rates (not seasonally adjusted) in Pickaway, Fairfield, and Hocking Counties were 4.0 percent, 3.8 percent, and 4.3 percent, respectively, which is commensurate with the statewide unemployment rate of 4.2 percent and nationwide rate of 3.8 percent. Primary industries remain light manufacturing and agriculture. Large employers in the MSA AA include DuPont, TriMold LLC, and Sofidel.

Competition in the AA is strong with national banks, savings associations, state banks, and branches of larger financial institutions. According to the June 30, 2019 FDIC's Deposit Market Share Report, the bank has a 2.8 percent deposit market share and ranks 11<sup>th</sup> out of 21 financial institution in the MSA AA. Other financial institutions with significant deposit market share in the MSA AA include Park National Bank, Vinton County National Bank, and JPMorgan Chase Bank. According to 2015 ACS U.S. Census data, the 2018 peer mortgage data shows KNB with a 2.2 percent lending market share in the MSA AA, which is 10<sup>th</sup> out of 203 financial institutions. Primary home mortgage lenders in the MSA AA include Huntington National Bank, JPMorgan Chase Bank, and Wells Fargo Bank.

According to 2010 U.S. Census data, the median housing value in the MSA AA was \$144,285. 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 2.6 to 4.2 times the annual income of LMI families in the AA. Housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 27,190 total housing units in the AA, of which 69.2 percent are owner-occupied and 21.6 percent are rental units. Approximately 9.3 percent of the families and 11.3 percent of the households live below the poverty level.

According to 2015 ACS U.S. Census data, the median housing value in the MSA AA was \$144,306. 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 2.4 to 3.9 times the annual income of LMI families in the AA. Based on the 2018 median family income of \$76,000, low-income families make less than \$38,000 and moderate-income families make less than \$60,800. Overall median housing values are approximately 2.4 to 3.8 times the annual income of LMI families in the AA. Housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. There are 27,274 total housing units in the MSA AA, of which 67.8 percent are owner-occupied and 23.3 percent are rental units. Approximately 8.6 percent of the families and 11.0 percent of the households live below the poverty level.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Kingston MSA AA, 2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	16	6.3	18.8	68.8	0.0	6.3
Population by Geography	72,604	3.6	12.9	78.5	0.0	5.0
Housing Units by Geography	27,190	4.6	15.8	79.6	0.0	0.0
Owner-Occupied Units by Geography	18,803	2.7	11.0	86.2	0.0	0.0
Occupied Rental Units by Geography	5,880	10.9	29.2	59.9	0.0	0.0
Vacant Units by Geography	2,507	3.6	20.5	76.0	0.0	0.0
Businesses by Geography	3,123	3.8	21.7	74.3	0.0	0.2
Farms by Geography	372	0.8	4.0	95.2	0.0	0.0
Family Distribution by Income Level	18,408	21.1	22.4	23.7	32.9	0.0
Household Distribution by Income Level	24,683	22.8	17.3	20.7	39.1	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$64,914	Median Housing Value			\$144,285
			Median Gross Rent			\$715
			Families Below Poverty Level			9.3%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data.            Due to rounding, totals may not equal 100.0.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Kingston MSA AA, 2017-2018</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	16	0.0	43.8	43.8	6.3	6.3
Population by Geography	72,642	0.0	35.0	55.4	4.7	4.8
Housing Units by Geography	27,274	0.0	40.5	54.9	4.6	0.0
Owner-Occupied Units by Geography	18,494	0.0	32.0	62.1	5.9	0.0
Occupied Rental Units by Geography	6,351	0.0	62.4	35.3	2.3	0.0
Vacant Units by Geography	2,429	0.0	48.0	51.0	0.9	0.0
Businesses by Geography	3,046	0.0	41.8	52.6	5.3	0.2
Farms by Geography	354	0.0	32.8	54.2	13.0	0.0
Family Distribution by Income Level	18,204	21.4	20.0	23.5	35.1	0.0
Household Distribution by Income Level	24,845	22.2	17.2	19.5	41.1	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$144,306
			Median Gross Rent			\$756
			Families Below Poverty Level			8.6%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data.            Due to rounding, totals may not equal 100.0.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Ohio

We conducted a full-scope review of both AAs, the Non-MSA AA and the MSA AA, to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The bank's Non-AA includes Ross County, Ohio, in its entirety. Data in this AA was analyzed and presented as one AA for purposes of this evaluation. The bank's MSA AA also includes Pickaway County, Ohio, and three CTs in Fairfield and Hocking Counties. Data in the MSA AA was analyzed and presented as one AA for purposes of this evaluation. Residential real estate, commercial or commercial real estate (small business), and farm lending are the bank's primary lending products. The review included an evaluation of all home mortgage loans reported in the HMDA LARs for 2016, 2017, and 2018 and a random sample of small loans to businesses and farms in each AA during the evaluation period. Refer to the Scope of the Evaluation section for more details.

## LENDING TEST

The bank's performance under the Lending Test in Ohio is rated Satisfactory.

Based on full-scope reviews, the bank's lending performance in the state of Ohio is reasonable.

## Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the AAs.

According to 2010 U.S. Census data, the bank had one low-income and three moderate-income CTs in the MSA AA, and no low-income and four moderate-income tracts in the Non-MSA AA. According to 2015 ACS U.S. Census data, the bank has no low-income and seven moderate-income tracts in the MSA AA, and no low-income and four moderate-income tracts in the Non-MSA AA.

Overall, analysis reflected lending in most areas with no conspicuous gaps in lending. In the Non-MSA AA, there were four moderate-income CTs, with three of the four located near Chillicothe. In 2016, one moderate-income CT in the Non-MSA AA (9556.02) included the Chillicothe Correctional Institute and Ross Correctional Institute Prisons, as well as land owned by the state of Ohio. Also, CT 213 in Pickaway County in the MSA AA includes the Orient State Prison and Pickaway Correctional Facility. This CT does not have an income classification.

### ***Home Mortgage Loans***

Refer to Table O in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank exhibits excellent geographic distribution of home mortgage loans in the AAs.

The bank's home mortgage lending in the MSA AA is overall excellent. In 2016, the bank originated 8.2 percent of the loans in the MSA AA in low-income CTs, which substantially exceeds the percentage of home mortgage loans of other home mortgage lenders (aggregate data) and demographic data (percentage of owner-occupied housing units) of 2.7 percent. The bank originated 6.1 percent of the loans in the MSA AA in moderate-income CTs, which is below both aggregate and demographic data but is overall reasonable. In 2017 – 2018, the bank originated 43.9 percent of the loans in the MSA AA in moderate-income CTs, which is significantly above both aggregate and demographic data. There were no low-income CTs in 2017-18 in the MSA AA.

The bank's home mortgage lending in the Non-MSA AA is excellent. There are no low-income CTs in the Non-MSA AA. In 2016 and 2017-2018, the bank's loan originations in moderate-income tracts exceed aggregate data and are commensurate with demographic data.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank exhibits reasonable geographic distribution of small loans to businesses in the AAs.

The bank's small business lending in the MSA AA reflects overall reasonable distribution. In 2016, the bank did not originate any loans in our sample to small businesses in low-income CTs in the MSA AA, which is less than the percentage of loans to small businesses of all reporting lenders (aggregate data) and the percentage of businesses in low-income tracts (demographic data). The bank originated 10.0 percent of the loans in the MSA AA sample in moderate-income CTs, which is also less than aggregate and demographic data but is overall reasonable. In 2017 – 2018, the bank originated 45.0 percent of the loans in our sample in the MSA AA in moderate-income CTs, which significantly exceeds aggregate and demographic data. In 2016, there was only one low-income tract and three moderate-income tracts. In 2017-18, there are no low-income tracts and seven moderate-income tracts.

The bank's small business lending in the Non-MSA AA reflects overall poor distribution. There are no low-income CTs in the Non-MSA AA. In 2016, the bank originated 5.0 percent of the loans in our sample to small businesses in moderate-income CTs in the Non-MSA AA, which is poor when compared to aggregate and demographic data. In 2017 – 2018, the bank originated 20.0 percent of the loans in our sample in the Non-MSA AA in moderate-income CTs, which is also below aggregate and demographic data.

We note that the sample size included 20 loans in 2016 and 20 in 2017-2018 in each AA, which only represents approximately 13.7 percent of the total small business loan originations (approximately 585 loans) during the evaluation period. In addition, the sample included multiple loans to the same borrower in middle-income CTs. This may have contributed to the lower representation of loans in moderate-income CTs.

### *Small Loans to Farms*

Refer to Table S in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The bank exhibits poor geographic distribution of small loans to farms in the AAs.

In 2016, the bank did not originate any loans in our sample to small farms in LMI CTs in the MSA AA. However, only 0.8 percent of the small farms are in low-income tracts, with aggregate lenders (the percentage of loans to small farms of all reporting lenders) not making any loans in the low-income CTs. There are approximately 4.0 percent of small farms in moderate-income CTs, with aggregate lenders making 2.9 percent of loans in these tracts. Overall the percentage of farms in LMI tracts is very low. In 2017-18, there were no low-income CTs in the MSA AA. The bank originated 25.0 percent of the loans in the sample in moderate-income CTs, which is less than the aggregate and demographic data (percentage of farms in moderate-income tracts). Approximately 42.5 percent of the farm loan sample was originated in CTs 325 and 326 in Fairfield County. Both CTs were middle-income as of the 2010 U.S. Census, but CT 326 changed to moderate-income as of the 2015 ACS U.S. Census. The bank's office in Amanda, Ohio, is in CT 326 as well. In addition, 20 percent of the loans in the farm sample were in CT 217, a middle-income geography. This CT is in Pickaway County, on the border of Ross County and CT 9555. We also noted that CT 213 in Pickaway County in the MSA AA includes the Orient State Prison and Pickaway Correctional Facility. This CT does not have an income classification.

There are no low-income CTs in the Non-MSA AA. In the Non-MSA AA, the bank did not originate any loans in moderate-income CTs in our loan sample, which is less than aggregate data and demographic data. However, not many farm loans were originated by aggregate lenders in the moderate-income CTs in 2016. Most of the farmland is not located in LMI geographies. Per discussion with management during the evaluation, there is less farmland in the Non-MSA AA than in the MSA AA. In the Non-MSA AA, there were four moderate-income CTs, with three of the four located near Chillicothe. In these geographies, the bank makes more business loans. As of the 2010 U.S. Census data, there was one moderate-income geography in the Non-MSA AA (9556.02) with the Chillicothe Correctional Institute and Ross Correctional Institute located in this geography, as well as land owned by the state of Ohio. As of the 2015 ACS U.S. Census data, CT 9557 is a moderate-income tract. This CT is in the far western part of Ross County near the county line (near Highland and Fayette Counties). Management stated that there is more farmland in the western part of Ross County; however, this is not close to one of their branches. We noted that approximately 52.5 percent of the farm loans in our

sample were originated in CT 9555. The bank's Kingston and Adelphi branches are also in this CT, which is an upper-income geography.

We note that the sample size was 20 loans in 2016 and 20 in 2017-2018 in each AA, which represents only 10.4 percent of the total farm originations (approximately 766 loans) during the evaluation period. In addition, the sample included multiple loans to the same borrower in middle- and upper-income CTs. This may have contributed to the lower representation of loans in moderate-income CTs.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

#### ***Home Mortgage Loans***

Refer to Table P in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The bank exhibits a reasonable distribution of home mortgage loans to individuals of different income levels in the AAs.

The bank's home mortgage lending to LMI borrowers in the MSA AA is reasonable. In 2016, the bank's lending to low-income borrowers in the MSA AA was 4.1 percent, which is reasonable when compared to the aggregate data of 6.9 percent. The bank's lending to moderate-income borrowers in the MSA AA was 14.3 percent, which is also reasonable when compared to aggregate data. In 2017 – 2018, the bank's lending to low-income borrowers in the MSA AA was 7.9 percent, which is commensurate with aggregate data of 7.9 percent. The bank's lending to moderate-income borrowers in the MSA AA was 19.3 percent, which is reasonable when compared to aggregate and demographic (percentage of families) data.

The bank's home mortgage lending to LMI borrowers in the Non-MSA AA is reasonable. In 2016, the bank's lending to low-income borrowers in the Non-MSA AA was 7.6 percent, which exceeds aggregate data of 7.3 percent. The bank's lending to moderate-income borrowers in the Non-MSA AA was 9.1 percent, which is less than aggregate data. In 2017 – 2018, the bank's lending to low-income borrowers in the Non-MSA AA was 4.5 percent, which is reasonable when compared with aggregate data of 5.8 percent. The bank's lending to moderate-income borrowers in the Non-MSA AA was 12.1 percent, which is less than aggregate and demographic data.

We note that the poverty rates for families below the poverty level in the MSA AA were 9.3 percent in 2016 and 8.6 percent in 2018. The poverty rates for families in the Non-MSA AA were 13.1 percent in 2016 and 14.0 percent in 2018. The poverty rates may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards. We also considered the median price of housing in the AAs relative to the maximum income of LMI borrowers, which may demonstrate a barrier to homeownership. Refer to the "Description of Institution's Operations in Ohio" for more details on the median price of housing in the AAs.

#### ***Small Loans to Businesses***

Refer to Table R in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The bank exhibits an excellent distribution of small loans to businesses of different sizes in the AAs.

The bank's lending to small businesses in the MSA AA is excellent. In our 2016 loan sample, the bank originated 80.0 percent of the loans to businesses with annual gross revenues less than \$1 million, which compares favorably with the aggregate data (the percentage of loans to small businesses of all reporting lenders) of 44.2 percent. In 2017 – 2018, the bank originated 85.0 percent of the loans to businesses with annual gross revenues less than \$1 million, which also compares favorably with the aggregate data of 48.9 percent.

The bank's lending in the Non-MSA AA is like the MSA AA, with the bank's percentages exceeding aggregate data.

### ***Small Loans to Farms***

Refer to Table T in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The bank exhibits an excellent distribution of small loans to farms of different sizes in the AAs.

The bank's lending to small farms in the MSA AA is excellent. In our 2016 loan sample, the bank originated 85.0 percent of the loans to farms with annual gross revenues less than \$1 million, which compares favorably with the aggregate data (the percentage of loans to small farms of all reporting lenders) of 25.0 percent. In 2017 – 2018, the bank originated 75.0 percent of the loans to farms with annual gross revenues less than \$1 million, which also compares favorably with the aggregate data of 35.4 percent.

The bank's lending in the Non-MSA AA is like the MSA AA, with the bank's percentages exceeding aggregate data.

### **Responses to Complaints**

The bank has not received any complaints about its CRA performance in helping to meet the AAs' credit needs during the evaluation period.

## Appendix A: Scope of Examination

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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 MSAs and non-MSAs 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”.

<b>Time Period Reviewed:</b>	01/01/2016 – 12/31/2018	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, and small farm loans.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Ohio</b>		
Non-MSA AA	Full-Scope	The AA includes Ross County, in its entirety, which is in a Non-MSA in the state of Ohio.
MSA AA	Full-Scope	The AA includes Pickaway County, in its entirety, and CTs 325 and 326 in Fairfield County, and CT 9650 in Hocking County. This AA is in the Columbus, OH MSA 18140.

## Appendix B: Summary of State Ratings

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RATINGS: KINGSTON NATIONAL BANK	
Overall Bank:	Lending Test Rating
Kingston National Bank	Satisfactory
State:	
Ohio	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**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; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (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), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/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. The median is the point at which half of the families have income above, and half below, a range of incomes. 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, and half below, a range of incomes.

**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.

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, 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 the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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 MMSA/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 that were 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) in those geographies. Because aggregate small business data are 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 Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business 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. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are 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 (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
MSA AA	49	6,035	100.0	2,394	2.7	8.2	2.7	11.0	6.1	9.3	86.2	85.7	88.0	0.0	0.0	0.0	0.0	0.0	0.0
Non-MSA AA	66	6,788	100.0	1,788	0.0	0.0	0.0	10.9	10.6	7.9	70.4	43.9	70.6	18.7	45.5	21.5	0.0	0.0	0.0

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
MSA AA	114	18,106	100.0	2,584	0.0	0.0	0.0	32.0	43.9	29.1	62.1	50.9	66.4	5.9	5.3	4.5	0.0	0.0	0.0
Non-MSA AA	132	15,558	100.0	1,753	0.0	0.0	0.0	19.0	18.9	16.6	62.4	43.2	61.6	18.6	37.9	21.8	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data; 2018 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0.

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2016</b>
		<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
MSA AA	49	6,035	100.0	2,394	21.1	4.1	6.9	22.4	14.3	19.4	23.7	12.2	23.2	32.9	59.2	30.0	0.0	10.2	20.4	
Non-MSA AA	66	6,788	100.0	1,788	21.0	7.6	7.3	20.4	9.1	18.4	21.1	12.1	22.5	37.4	50.0	37.4	0.0	21.2	14.4	

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2017-18</b>
		<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
MSA AA	114	18,106	100.0	2,584	21.4	7.9	7.9	20.0	19.3	21.7	23.5	16.7	25.5	35.1	45.6	28.6	0.0	10.5	16.4	
Non-MSA AA	132	15,558	100.0	1,753	22.9	4.5	5.8	18.7	12.1	20.3	20.1	16.7	23.8	38.3	46.2	33.5	0.0	20.5	16.5	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data; 2018 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0.*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2016</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
MSA AA	20	2,437	100.0	602	3.8	0.0	2.8	21.7	10.0	18.9	74.3	90.0	78.2	0.0	0.0	0.0	0.2	0.0	0.0
Non-MSA AA	20	1,644	100.0	546	0.0	0.0	0.0	35.9	5.0	29.9	50.3	60.0	54.0	13.8	35.0	16.1	0.0	0.0	0.0

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017-18</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
MSA AA	20	1,659	100.0	614	0.0	0.0	0.0	41.8	45.0	31.8	52.6	50.0	63.0	5.3	5.0	5.2	0.2	0.0	0.0
Non-MSA AA	20	1,886	100.0	517	0.0	0.0	0.0	39.2	20.0	34.6	47.0	50.0	49.7	13.8	30.0	15.7	0.0	0.0	0.0

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0.*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2016</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
MSA AA	20	2,437	100.0	602	82.7	80.0	44.2	4.7	15.0	12.6	5.0	
Non-MSA AA	20	1,644	100.0	546	79.7	55.0	43.8	4.8	35.0	15.5	10.0	
<i>Source: 2016 D&amp;B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0.</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017-18</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
MSA AA	20	1,659	100.0	614	81.8	85.00	48.9	4.9	15.0	13.4	0.0	
Non-MSA AA	20	1,886	100.0	517	78.9	60.0	49.1	5.0	35.0	16.1	5.0	
<i>Source: 2018 D&amp;B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0.</i>												

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																			<b>2016</b>
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
MSA AA	20	2,157	100.0	68	0.8	0.0	0.0	4.0	0.0	2.9	95.2	100.0	97.1	0.0	0.0	0.0	0.0	0.0	0.0
Non-MSA AA	20	1,430	100.0	56	0.0	0.0	0.0	6.0	0.0	1.8	75.3	35.0	94.6	18.6	65.0	3.6	0.0	0.0	0.0

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

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																			<b>2017-18</b>
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
MSA AA	20	1,405	100.0	79	0.0	0.0	0.0	32.8	25.0	40.5	54.2	75.0	40.5	13.0	0.0	19.0	0.0	0.0	0.0
Non-MSA AA	20	1,740	100.0	59	0.0	0.0	0.0	22.0	0.0	23.7	59.9	50.0	71.2	18.1	50.0	5.1	0.0	0.0	0.0

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0.*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
MSA AA	20	2,157	100.0	68	98.9	85.0	25.0	0.8	15.0	0.3	0.0
Non-MSA AA	20	1,430	100.0	56	99.1	100.0	51.8	0.5	0.0	0.5	0.0

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
MSA AA	20	1,405	100.0	79	98.3	75.0	35.4	1.4	15.0	0.3	10.0
Non-MSA AA	20	1,740	100.0	59	99.1	80.0	44.1	0.4	10.0	0.4	10.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0.