



PUBLIC DISCLOSURE

September 13, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Citizens National Bank of Woodsfield
Charter Number 13847

143 S. Main Street
Woodsfield, OH 43793

Office of the Comptroller of the Currency

200 Public Square Suite 1610
Cleveland, OH 44114-2301

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, 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:

- A substantial majority of the bank's loans are inside the assessment areas (AAs).
- The loan-to-deposit (LTD) ratio is reasonable.
- The bank exhibits a reasonable distribution of home mortgage loans to individuals of different income levels.
- The bank exhibits a reasonable geographic distribution of loans inside the AAs.

Loan-to-Deposit Ratio

Considering Citizens National Bank of Woodsfield's (CNBW or bank) size, financial condition, and credit needs of the bank's AAs, the bank's LTD ratio is reasonable. CNBW's LTD ratio is calculated on a bank-wide basis and meets the standard for satisfactory performance. CNBW's quarterly average LTD ratio, using the 19 quarters since the last CRA evaluation (June 30, 2016 to December 31, 2020) was 41.1 percent, with quarterly ratios ranging from a low of 37.9 percent in the first quarter 2019 to a high of 43.3 percent in the third quarter of 2016. The quarterly average LTD ratio for other banks, which consists of three banks with less than \$1 billion in total assets and bank offices in the AAs, ranged between 29.8 percent to 86.9 percent. CNBW's quarterly average LTD ratio ranked third among the four banks.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs. The bank originated and purchased 86.2 percent of its total loans by number, and 85.9 percent by dollar, inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

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										
2018	72	94.7	4	5.3	76	7,414	95.5	351	4.5	7,765
2019	81	80.2	20	19.8	101	8,344	79.3	2,184	20.7	10,528
2020	60	85.7	10	14.3	70	6,140	85.4	1,047	14.6	7,187
Subtotal	213	86.2	34	13.8	247	21,898	85.9	3,582	14.1	25,480
Total	213	86.2	34	13.8	247	21,898	85.9	3,582	14.1	25,480
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

CNBW is a full-service intrastate, federally chartered community bank headquartered in Woodsfield, Ohio servicing all of Monroe County, and portions of Belmont and Guernsey Counties. As of December 31, 2020, the bank's total assets were \$141.6 million. The bank is a wholly owned subsidiary of CNB Bancorp, a one-bank holding company.

CNBW's business strategy is to offer its customers a range of loan products, including home mortgage, consumer, commercial, agricultural and municipal loans, in addition to checking, savings, and time deposit accounts. CNBW offers limited online banking including the ability to review balances, transfer funds between accounts, and bill pay. There are no substantial differences in the business focus or services offered between the bank's branches.

CNBW has four full-service branches within their AAs. No branches were opened or closed since the prior CRA examination in 2016. All four branches, which includes the main office, operate in moderate income census tracts (CTs). Two branches, Woodsfield and Barnesville, offer 24-hour Automated Teller Machines (ATMs). CNBW's primary loan product is residential real estate loans.

As of December 31, 2020, the total loan portfolio was \$52.5 million, or 36 percent of total assets. As of December 31, 2020, the loan portfolio is comprised of 1-4 family residential loans of 75 percent, commercial/industrial and commercial real estate loans of 18 percent, consumer loans of 3 percent, and agricultural loans of 1 percent. Refer to the *Description of the Institution's Operations in Ohio* section for additional information.

There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AAs. The bank was rated Satisfactory at the prior CRA performance evaluation, dated August 8, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We performed our evaluation using the small bank CRA examination procedures. The evaluation period for lending activity covers January 1, 2018 through December 31, 2020. Based on the bank's internal reports for lending activity and discussions with senior management, we determined that the bank's primary lending focus during the evaluation period was home mortgage loans. We evaluated the bank's lending performance based on its primary loan product. While CNBW offers other products, such as commercial, consumer and agricultural loans, these products are not a primary lending focus. As a result, we did not consider these as part of our evaluation, as an analysis of this data would not be meaningful. Prior to the evaluation, we tested the accuracy of the bank's reported Home Mortgage Disclosure Act loan data and determined the information is accurate.

Information from members of the local community was considered in our assessment. We contacted three organizations focused on affordable housing, and economic and community development within the bank's AAs.

Selection of Areas for Full-Scope Review

We selected CNBW's Monroe and Belmont AAs for full-scope reviews as these have the majority of the bank's deposits and loan activity. Refer to the "Scope" section under the State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A – Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

CNBW's overall rating is based on its lending in the state of Ohio. The state rating is based on performance in the bank's AAs that received full-scope reviews. We gave more consideration to the bank's performance within the Monroe AA when determining the overall state rating as this represented the bank's largest market with the most predominant deposit concentrations and lending activity. The bank is also headquartered in the Monroe AA. Refer to the "Scope" paragraph within the "State" section of this document for details regarding how the areas were weighted in arriving at the respective ratings. We based our conclusions for the lending test on the home mortgage loan activity giving more weight to the volume in the Monroe AA.

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 Ohio¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- A substantial majority of the bank's loans are inside the AAs.
- The bank's LTD ratio is reasonable.
- The bank exhibits reasonable geographic distribution of loans inside the AAs.
- The bank exhibits a reasonable distribution of home mortgage loans to individuals of different income levels.

Description of Institution's Operations in Ohio

CNBW has three AAs located in southeastern Ohio that consist of Monroe, Belmont, and Guernsey counties. The CTs within each AA are contiguous, meet the requirements of the CRA, and do not arbitrarily exclude any LMI areas. The AAs have no designated distressed or underserved CTs. Bank management selected the AAs based on its targeted lending territory, the area with the most deposit and lending activity, and office locations.

Monroe AA

The Monroe AA consists of four CTs in southeast Ohio. CNBW has two branches in the AA, one in Woodsfield, OH and the other in Sardis, OH. CNBW's main office in Woodsfield, OH offers a 24-hour ATM. According to 2015 ACS data, the four contiguous Monroe AA CTs, included 3 middle-income and one moderate-income CTs. There were no upper- or low-income CTs. There were no MSA delineation changes or CT classification changes since the previous CRA evaluation in 2016.

The unemployment rate for the Monroe AA exceed the state averages. According to the U.S. Department of Labor's Bureau of Labor Statistics database, the unadjusted average annual unemployment rate for Monroe Count increase from an average of 7.7 percent in 2018 to 10.6 percent in 2020. The state-wide unemployment rate for the same period jumped from 4.5 percent to 8.1 percent. Major employers in the AA include Monroe County Government, Riesbecks Food Markets, Safe Auto Insurance, Switzerland of Ohio Local Board of Education, Woodsfield Nursing Home, and Arbors/Woodsfield Nursing Home.

Competition for deposits within the AA is moderate. According to the June 30, 2020, FDIC Insured Institutions Deposit Market Share Report, there are three FDIC-insured institutions (CNBW, Wesbanco Bank, and Woodsfield Savings Bank) operating five offices in the AA. CNBW obtains 77.8 percent of their total deposits from the Monroe AA. The bank's deposit market share percentage increased slightly

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

from 38.4 percent in 2018 to 39 percent in 2020. The bank's deposit market share position slipped from first to second in the AA during the period.

Competition for loans within the AA is strong. The total number of lenders that made a loan in the AA was 63 in 2018, 42 in 2019, and 59 in 2020. According to the 2018 and 2019 peer mortgage data the bank ranked second and first, respectively, with a 17.4 percent market share in 2018, and 25.7 percent market share in 2019. CNBW originated 68.6 percent of their home mortgage loans in 2020 within the Monroe AA. The bank was exempt from filing a HMDA LAR in 2020; however, they would have ranked first with the 48 mortgage loans originated corresponding to a 17.1 percent market share. The top five lenders in 2020 were Woodsfield Savings Bank, Wesbanco Bank, Bayer Heritage, Quicken Loans, and Ohio Valley Community Federal, which represented 51.1 percent of the market's mortgage lending.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Citizens Monroe Non MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	25.0	75.0	0.0	0.0
Population by Geography	14,547	0.0	28.4	71.6	0.0	0.0
Housing Units by Geography	7,501	0.0	28.1	71.9	0.0	0.0
Owner-Occupied Units by Geography	4,687	0.0	28.3	71.7	0.0	0.0
Occupied Rental Units by Geography	1,369	0.0	36.9	63.1	0.0	0.0
Vacant Units by Geography	1,445	0.0	19.1	80.9	0.0	0.0
Businesses by Geography	718	0.0	39.6	60.4	0.0	0.0
Farms by Geography	60	0.0	13.3	86.7	0.0	0.0
Family Distribution by Income Level	4,204	24.0	21.8	21.6	32.6	0.0
Household Distribution by Income Level	6,056	24.4	18.7	20.7	36.2	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$92,632
			Median Gross Rent			\$541
			Families Below Poverty Level			13.3%
<i>Source: 2015 ACS and 2019 D&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>						

Belmont AA

The Belmont AA consists of three CTs in southeast Ohio. CNBW has one branch in the AA located in Barnesville, OH, which offers a 24-hour ATM. According to 2015 ACS data, the three contiguous Belmont AA CTs, a part of the Wheeling WV-OH MSA, included 2 middle-income and one moderate-income CTs. There were no upper- or low-income CTs. There were no MSA delineation changes or CT classification changes since the previous CRA evaluation in 2016.

The unemployment rate for the Belmont AA exceed the state averages. According to the U.S. Department of Labor's Bureau of Labor Statistics database, the unadjusted average annual unemployment rate for Belmont County increase from an average of 5.5 percent in 2018 to 10.1 percent in 2020. The state-wide unemployment rate for the same period rose from 4.5 percent to 8.1 percent.

Major employers in the AA include Barnesville Hospital Association, Belmont Community Hospital, East Ohio Regional Hospital, Stingray Energy Services, and Murray Energy/Ohio Valley Coal.

Competition for deposits within the AA is strong with the presence of many regional and community banks. According to the June 30, 2020, FDIC Insured Institutions Deposit Market Share Report, there are 13 FDIC-insured institutions operating 31 offices in the AA. CNBW obtains 15.5 percent of their total deposits within the Belmont AA. The bank's deposit market share percentage decreased slightly from 1.2 percent in 2018 to 1.1 percent in 2020. The bank's deposit market share position increased from 12th to 11th in the AA during the period. The top five institutions in the AA include Wesbanco Bank, Inc, Unified Bank, Belmont Savings Bank, The Huntington National Bank, and PNC Bank, N.A. The top five banks operated 23 offices in the AA and have a deposit market share of 86.3 percent.

Competition for loans within the AA is strong. The total number of lenders that made a loan in the AA was 76 in 2018, 61 in 2019, and 67 in 2020. According to the 2018 and 2019 peer mortgage data the bank ranked third and fifth respectively with a 6.4 percent market share in 2018 and a 4.4 percent market share in 2019. CNBW originated 12.9 percent of their mortgage loans within the Belmont AA in 2020. The bank was exempt from filing a HMDA LAR in 2020; however, they would have ranked 10th with 9 mortgage loans corresponding to a 2.7 percent market share. The top five lenders in 2020 were Wesbanco Bank, Belmont Savings Bank, Union Home Mortgage Corp, Woodsfield Savings Bank, and Quicken Loans, which represented 45.8 percent of the market's mortgage lending.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Citizens Wheeling MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	33.3	66.7	0.0	0.0
Population by Geography	13,875	0.0	17.2	82.8	0.0	0.0
Housing Units by Geography	6,539	0.0	17.5	82.5	0.0	0.0
Owner-Occupied Units by Geography	4,376	0.0	15.2	84.8	0.0	0.0
Occupied Rental Units by Geography	1,193	0.0	22.4	77.6	0.0	0.0
Vacant Units by Geography	970	0.0	21.4	78.6	0.0	0.0
Businesses by Geography	706	0.0	11.5	88.5	0.0	0.0
Farms by Geography	53	0.0	5.7	94.3	0.0	0.0
Family Distribution by Income Level	3,668	17.8	18.7	22.6	40.9	0.0
Household Distribution by Income Level	5,569	24.0	17.9	17.4	40.7	0.0
Median Family Income MSA - 48540 Wheeling, WV-OH MSA		\$56,853	Median Housing Value			\$93,713
			Median Gross Rent			\$522
			Families Below Poverty Level			8.7%
<i>Source: 2015 ACS and 2019 D&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>						

We considered information from three community contacts in affordable housing, economic development, and community development in order to obtain an understanding of the AAs financial

needs and credit opportunities. Areas of opportunities include participation on boards, general operating support, grants for emergency assistance, volunteer opportunities and credit related projects.

Scope of Evaluation in Ohio

We selected CNBW's Monroe and Belmont AAs for full-scope reviews as these AAs have a majority of the bank's deposits and loans. Refer to *Appendix A* for additional information regarding areas receiving full-scope reviews.

We evaluated CNBW's performance in the state of Ohio by analyzing the bank's lending performance from January 1, 2018 through December 31, 2020. We gave more consideration to the bank's performance within the Monroe AA based on total loan originations and total deposits serviced, when determining the overall state rating. Additionally, Monroe is the bank's primary AA and where the bank is headquartered. In determining our ratings, we weighed demographic factors of the AAs that could affect the bank's ability to lend. These factors include significant competition from institutions, the number of low- and moderate-income CTs, and location of the majority of owner-occupied housing. A limited scope will be performed for the Guernsey AA.

We also utilized other supporting information while evaluating CNBW's CRA performance. Additional supporting information included 2015 ACS data, 2018 through 2020 bank loan data, FDIC deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AAs. We also considered information from community contacts to help assess the needs of the bank's AAs and the opportunities for financial institutions to lend and provide services within those areas.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Monroe and Belmont AAs is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits a reasonable geographic distribution of loans in the State of Ohio.

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.

Monroe AA

The bank's distribution of home mortgage loans among geographies of different income levels in the Monroe AA, during 2018-2020 is excellent. There were no low-income CTs in the AA during the evaluation period. The bank's percentage of home mortgage loans among geographies of moderate-income CTs in the AA was 49.7 percent. This is significantly above the 28.3 percent of the AAs owner-occupied housing units in moderate-income geographies and significantly above the 30.0 percent aggregate bank lending.

Belmont AA

The bank's distribution of home mortgage loans among geographies of different income levels in the Belmont AA during 2018-2020 is very poor. There were no low-income CTs in AA. The bank's percentage of home mortgage loans among geographies of moderate-income CTs in the AA was 4.4 percent. This is significantly below the 15.2 percent of the AAs owner-occupied housing units in moderate-income geographies and significantly below the 15.8 percent aggregate bank lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable, distribution of loans to individuals of different income levels, 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.

Monroe AA

The bank's distribution of home mortgage loans to borrowers of different income levels during 2018-2020 in the Monroe AA is reasonable. CNBW's percentage of home mortgage loans to low-income borrowers was 9.4 percent. This is significantly below the 24.0 percent of low-income families living in the AA but higher than the 8.2 percent aggregate bank lending. However, the bank's percentage of home mortgage loans to moderate-income borrowers of 16.8 percent was lower than the 21.8 percent of moderate-income families living in the AA, but higher than the 15.0 aggregate bank lending.

Belmont AA

The bank's distribution of home mortgage loans to borrowers of different income levels during 2018-2020 in the Belmont AA is reasonable. CNBW's percentage of home mortgage loans to low-income borrowers was 9.7 percent. This is below the 17.8 percent of low-income families living in the AA, but in line with the 10.0 percent aggregate bank lending. However, the bank's percentage of home mortgage loans to moderate-income borrowers of 5.6 percent was below the 18.7 percent of moderate-income families living in the AA and below the 21.2 percent aggregate bank lending.

Responses to Complaints

The bank has not received any complaints pertaining to CRA during the evaluation period.

Conclusions for Guernsey AA Receiving a Limited Scope Review

The Guernsey AA does not contain any low- or moderate-income CTs and the bank's volume of home mortgage loans was only 19 loans, or 8.9 percent of total mortgage loans originated, from 2018-2020, which is not significant enough to allow for meaningful quantitative distribution analysis of loans by income level of the borrower.

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 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”.

Time Period Reviewed:	01/01/2018 to 12/31/2020	
Bank Products Reviewed:	Home mortgage loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
Monroe AA	Full-Scope	All of Monroe County Not part of an MSA
Belmont AA	Full-Scope	CTs 108.02, 109, 110 (Wheeling WV-OH Multi-state MSA)
Guernsey AA	Limited-Scope	CTs 9771, 9777, 9778 Non-MSA

Appendix B: Summary of MMSA and State Ratings

RATINGS	The Citizens National Bank of Woodsfield
Overall Bank:	Lending Test Rating
The Citizens National Bank of Woodsfield	Satisfactory
State:	
Ohio	Satisfactory

Appendix C: Definitions and Common Abbreviations

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: 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

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 30th 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 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 in 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 MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018-20
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	
Citizens Monroe Non-MSA	149	14,323	100.0	233	0.0	0.0	0.0	28.3	49.7	30.0	71.7	50.3	70.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	149	14,323	100.0	233	0.0	0.0	0.0	28.3	49.7	30.0	71.7	50.3	70.0	0.0	0.0	0.0	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 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																				2018-20
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	
Citizens Wheeling MSA	45	5,634	100.0	330	0.0	0.0	0.0	15.2	4.4	15.8	84.8	95.6	84.2	0.0	0.0	0.0	0.0	0.0	0.0	
Total	45	5,634	100.0	330	0.0	0.0	0.0	15.2	4.4	15.8	84.8	95.6	84.2	0.0	0.0	0.0	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 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																			2018-20	
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	
Citizens Guernsey Non-M SA	19	1,941	100.0	407	0.0	0.0	0.0	0.0	0.0	0.0	67.7	94.7	64.6	32.3	5.3	35.4	0.0	0.0	0.0	
Total	19	1,941	100.0	407	0.0	0.0	0.0	0.0	0.0	0.0	67.7	94.7	64.6	32.3	5.3	35.4	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-20	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Citizens Monroe Non MSA	149	14,323	100.0	233	24.0	9.4	8.2	21.8	16.8	15.0	21.6	24.2	24.0	32.6	44.3	40.3	0.0	5.4	12.4	
Total	149	14,323	100.0	233	24.0	9.4	8.2	21.8	16.8	15.0	21.6	24.2	24.0	32.6	44.3	40.3	0.0	5.4	12.4	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-20	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Citizens Wheeling MSA	45	5,634	100.0	330	17.8	9.7	10.0	18.7	5.6	21.2	22.6	11.1	21.2	40.9	75.6	36.4	0.0	11.1	11.2	
Total	45	5,634	100.0	330	17.8	9.7	10.0	18.7	5.6	21.2	22.6	11.1	21.2	40.9	75.6	36.4	0.0	11.1	11.2	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-20	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Citizens Guernsey Non MSA	19	1,941	100.0	407	16.8	12.5	3.9	17.6	47.4	15.2	26.8	21.1	23.1	38.9	21.1	43.2	0.0	12.5	14.5	
Total	19	1,941	100.0	407	16.8	12.5	3.9	17.6	47.4	15.2	26.8	21.1	23.1	38.9	21.1	43.2	0.0	12.5	14.5	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*