



PUBLIC DISCLOSURE

November 8, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

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

103 South Springfield Street
St. Paris, OH 43072

Office of the Comptroller of the Currency

Central Ohio – Indiana Field Office
655 Metro Place South, Suite 625
Dublin, OH 43017

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 rating and the following overall conclusions:
 - The loan-to-deposit (LTD) ratio is reasonable.
 - A substantial majority of the bank's loans are inside the assessment area (AA).
 - The bank exhibits a reasonable distribution of loans to businesses and farms of different sizes.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

The First Central National Bank of St. Paris' (FCNB or the bank) quarterly average LTD ratio over the 16 quarters since the previous Community Reinvestment Act (CRA) evaluation (September 30, 2017 – June 30, 2021) is 62.4 percent. The ratio ranged from a low of 53.8 percent at June 30, 2021, to a high of 67.3 percent at September 30, 2017. The bank's quarterly average LTD ratio of 62.4 percent is reasonable when compared to financial institutions of similar size in the bank's AA, which includes seven financial institutions with total assets less than \$500 million and bank offices in Champaign, Logan, Shelby, and Miami counties. The other seven financial institutions have an average LTD ratio of 87 percent. Two of these seven financial institutions were outliers with quarterly average LTD ratios of 106 percent and 101.7 percent. When removing the outliers from the average, the new quarterly average LTD ratio for similarly situated banks is 80.2 percent. Five of the seven financial institutions in the AA have total assets ranging from \$127.1 million to \$467.5 million at June 30, 2021, which is higher than FCNB's total assets of \$108.4 million for the same date.

There was strong competition in the AA during the evaluation period with at least 30 financial institutions in Champaign, Logan, Shelby, and Miami counties, operating 84 offices as of June 30, 2021 (Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report). Credit unions in the AA also provide lending competition. Total net loans and leases remained relatively stable as of year ends 2018, 2019, and 2020.

The COVID-19 pandemic in 2020 impacted the national and local economy. As a result, the Small Business Administration's (SBA) Paycheck Protection Program (PPP) provided loans to help businesses keep their workforces employed during the pandemic. The bank was responsive to the SBA's PPP and originated 184 loans totaling \$2.7 million in 2020. Additionally, total deposits grew approximately 16.5 percent from December 31, 2019 to June 30, 2021 due primarily to excess deposits resulting from the

SBA's PPP and government stimulus checks received in response to the COVID-19 pandemic. The increase in total deposits impacted the bank's LTD ratios in 2020 and 2021.

Lending in Assessment Area

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

The bank originated and purchased 85 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.

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		
	#	%	#	%		\$	%	\$	%	
Small Business	47	78.3	13	21.7	60	1,378	67.2	674	32.8	2,052
Small Farm	55	91.7	5	8.3	60	3,029	92.4	249	7.6	3,278
Total	102	85.0	18	15.0	120	4,407	82.7	923	17.3	5,330

Source: 01/01/18 – 12/31/20 Bank Data.
Due to rounding, totals may not equal 100.00%.

Description of Institution

FCNB is a wholly owned subsidiary of Central Bancshares, Inc., a one-bank holding company. Both FCNB and the holding company are headquartered in St. Paris, Ohio. St. Paris is approximately 55 miles west of Columbus, Ohio, in the western portion of Champaign County. As of December 31, 2020, total assets were \$102 million with \$48.6 million in net loans and leases, \$83.2 million in total deposits, and \$17.1 million in tier 1 capital. There is no merger or acquisition activity that affects the scope of the bank's operations during the evaluation period.

FCNB operates the main office in St. Paris and two branch offices in Christiansburg and Rosewood, Ohio. The main office and the Christiansburg branch have a drive-up facility, but the Rosewood office does not. The bank has a 24-hour automated teller machine (ATM) at its main office location and an off-premise ATM at a restaurant in Christiansburg. The Rosewood branch does not have an ATM. All the bank's offices and ATMs are in Champaign County in a middle-income census tract (CT). No offices have been opened or closed since the previous CRA evaluation in 2017.

FCNB is a single state financial institution with one AA in Ohio, which is the bank's only rating area. The Non-MSA AA is as follows:

- Champaign County – entire county.
- Logan County – CTs 40, 41, 42, and 43 in the western section of the county.
- Shelby County – CT 9722 in the southeastern part of the county.
- Miami County – CT 3901 in the eastern part of the county. The CT in Miami County is in the Dayton-Kettering, OH MSA 19430. The bank does a moderate level of lending in this CT. However, the bank does not have any branches in this CT, and it does not extend substantially beyond the Non-MSA boundary. Therefore, this one CT is included in the Non-MSA AA.

The AA is described in the “Scope of the Evaluation” and “Description of Institution’s Operations in Ohio” sections in this performance evaluation.

As of the December 31, 2020, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Reports (UBPR), FCNB’s total loans were approximately \$49 million representing 48 percent of total assets. The bank offers a variety of traditional lending and deposit products and services through its three offices to accommodate its customers, including business, farm, home mortgage, and consumer loans as well as online banking. There are no substantial differences in the business focus or services offered between the bank’s branches, other than there are no onsite loan officers in the branch offices. All loans are originated out of the main office.

FCNB’s primary business focus is agricultural production and farmland loans (small farm loans) and commercial and industrial loans and commercial real estate loans (small business loans). The bank’s loan portfolio, as of the December 31, 2020, Call Report, is comprised of farm loans of 51.5 percent, business loans of 20.7 percent, residential real estate loans of 23.9 percent, and consumer loans of 3.9 percent. The bank does not sell home mortgage loans to the secondary market.

Presently, no legal or financial impediments exist that could restrict or affect FCNB’s ability to meet the credit needs of its AA. The bank’s previous CRA evaluation was as of August 21, 2017 and resulted in a Satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) conducted a CRA performance evaluation to assess the bank’s record of meeting the credit needs of its entire community, including low- or moderate-income (LMI) areas. The OCC used small bank CRA evaluation procedures to assess the bank’s performance under the Lending Test. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2018, to December 31, 2020.

Based on discussions with management and the number and dollar volume of loan origination data supplied by the bank during the evaluation period, FCNB’s primary lending focus is small farm and small business lending. Based on the dollar volume of originated loans during the evaluation period, farm loans accounted for 50.1 percent, business loans accounted for 31.6 percent, residential real estate loans accounted for 10.3 percent, and consumer loans accounted for 8 percent of total loan originations. Based on the number of originated loans during the evaluation period, farm loans accounted for 33.5 percent, business loans accounted for 37.5 percent, residential real estate loans accounted for 4.6 percent, and consumer loans accounted for 24.4 percent of total loan originations.

The OCC evaluated the bank’s lending performance based on the primary products, small farm and small business loans. While the bank offers other lending products, such as home mortgage and consumer loans, these products were not a primary product during the evaluation period. As a result, the OCC did not consider these as part of the performance evaluation, as an analysis of this data would not be meaningful.

To evaluate the bank's performance during the evaluation period, the OCC relied on internal bank reports for the small farm and small business loans. For the lending analysis, the OCC transaction tested 60 small farm and 60 small business loans during the evaluation period. For analysis purpose, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census data and Dun and Bradstreet (D&B) data as of June 2020. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, 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, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating 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.

FCNB has one AA in Ohio in a non-metropolitan statistical area (Non-MSA AA). In the AA, 12.5 percent of the CTs are moderate-income, 68.8 percent are middle-income, and 18.8 percent are upper-income CTs. There are no low-income CTs in the AA. The OCC completed a full-scope review of the Non-MSA AA. The bank's AA remained the same throughout the evaluation period. A community profile for the AA is provided in the "Description of Institution's Operations in Ohio" in the state section of this performance evaluation.

Ratings

The bank's overall rating is based on the State of Ohio rating.

FCNB operates in the State of Ohio, with all branches in Champaign County, Ohio. The State of Ohio rating is based on performance in the bank's only AA, the Non-MSA AA. The OCC placed equal weight on the bank's primary lending products originated during the evaluation period. Refer to the "Scope" section under the state section for details regarding how the areas were weighted in arriving at the respective ratings.

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 bank has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this bank 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's distribution of loans to small businesses and small farms reflects a reasonable distribution of loans to businesses and farms of different sizes.
- FCNB has not received any complaints about its CRA performance in helping to meet the AA's credit needs during the evaluation period.

Description of Institution's Operations in Ohio

FCNB has one AA located in a Non-MSA in Ohio. As stated above, the Non-MSA AA includes Champaign County in its entirety, four CTs in the western section of Logan county, one CT in the southeastern part of Shelby County, and one CT in the eastern section of Miami County. The CTs within the AA are contiguous, meet the requirements of the CRA, and do not arbitrarily exclude any LMI areas. There are no designated distressed or underserved CTs in the AA.

Bank management selected this AA based on the bank's targeted lending territory, the area with the most deposit and lending activity, and branch locations. The bank is headquartered in Champaign County and does most of its lending and deposit activity in this county. The CTs outside Champaign County include counties located near the bank's branches. The bank's primary market area is Champaign County. Urbana is the county seat of Champaign County. Based on the 2015 ACS U.S. Census, the AA comprises 16 CTs, of which two are moderate-income, eleven are middle-income, and three are upper-income CTs.

According to the 2015 ACS U.S. Census data, the population of the AA is 62,737, with 8.9 percent of the population living in moderate-income CTs, 71.1 percent living in middle-income CTs, and 20 percent living in upper-income CTs. The AA continues to experience a small decline in population, with a 1.6 percent decline from the 2010 U.S. Census (63,749 persons) to the 2015 ACS U.S. Census. The AA includes 17,299 families and 24,844 households.

As stated above, FCNB's primary business focus is small business and small farm lending. Most of the businesses in the AA are small as measured by the number of employees and gross annual revenues. According to the D&B data as of June 2020, 83.9 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 69.5 percent have fewer than five employees. Only 2.3 percent of the businesses are headquartered in the bank's AA, and 89.1 percent operate from a single location.

Most of the farms in the AA are small as measured by gross annual revenues. According to the D&B data as of June 2020, 97.9 percent of the farms located in the AA have gross annual revenues of \$1 million or less. Approximately 3.5 percent of the farms are in moderate-income CTs, with the remaining in middle- and upper-income CTs.

Competition in the AA is strong due to the presence of many regional and community banks, as well as credit unions. Competitors with significant deposit market share at June 30, 2021, include U.S. Bank National Association (N.A.), Fifth Third Bank, N.A., JPMorgan Chase Bank, N.A., and Park National Bank. These four banks account for approximately 46 percent of the total deposit market share in Champaign, Logan, Miami, and Shelby counties as of June 30, 2021. As of the June 30, 2021, FDIC's Deposit Market Share Report, there were 30 financial institutions operating 84 banking offices in these four counties, including FCNB. The June 30, 2021, FDIC deposit market share data shows FCNB's \$89.9 million in total deposits in the AA ranks seventeenth in overall deposit market share at 1.8 percent.

During the evaluation period, the economic conditions in the AA were overall stable, given the present COVID-19 pandemic. The national economy suffered from a global pandemic (COVID-19) in 2020 and many people temporarily lost their jobs as a result. Therefore, unemployment rates were higher in 2020. On average, Champaign, Shelby, and Miami counties were lower than the annual average State of Ohio unemployment rates, with Logan County lower or commensurate with the State of Ohio average annual unemployment rates.

Average Annual Unemployment Rates (not seasonally adjusted)			
	2018	2019	2020
Champaign County	3.8	3.7	7.1
Logan County	3.7	3.7	8.2
Shelby County	3.8	3.6	7.7
Miami County	3.9	3.7	7.0
State of Ohio	4.5	4.2	8.1

Source: U.S. Bureau of Labor Statistics.

The AA has a diverse employer base across many industries from manufacturing and service industries to agriculture. Major employers in Champaign County include KTH Parts Industries, Inc., Rittal Corporation, Honeywell International, Inc., and Johnson Welded Products, Inc. Major employers in Logan County include Honda of America Manufacturing, Inc., Honda Transmission Manufacturing, Inc., Midwest Express, county and city government, and the local school systems. Major employers in Shelby County include Honda of America Manufacturing, Inc., Emerson Climate Technologies, and Airstream. Major employers in Miami County include Upper Valley Medical Center, Clopay Building Products, F&P America, Meijer Distribution Center, and UTC Aerospace Systems.

As part of the CRA performance evaluation, the OCC reviewed information provided from an interview with a representative from an affordable housing organization. The contact identified affordable housing as a credit need in the community, as well as homeownership counseling and financial education. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Non-MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	12.5	68.8	18.8	0.0
Population by Geography	62,737	0.0	8.9	71.1	20.0	0.0
Housing Units by Geography	30,181	0.0	11.4	71.5	17.1	0.0
Owner-Occupied Units by Geography	18,653	0.0	7.0	72.1	20.9	0.0
Occupied Rental Units by Geography	6,191	0.0	17.0	68.9	14.1	0.0
Vacant Units by Geography	5,337	0.0	20.2	72.7	7.1	0.0
Businesses by Geography	2,841	0.0	8.4	73.0	18.5	0.0
Farms by Geography	434	0.0	3.5	73.3	23.3	0.0
Family Distribution by Income Level	17,299	18.4	16.8	23.3	41.5	0.0
Household Distribution by Income Level	24,844	20.1	17.0	18.0	44.9	0.0
Median Family Income MSA - 19430 Dayton-Kettering, OH MSA		\$61,957	Median Housing Value			\$121,444
Median Family Income Non-MSAs - OH		\$55,785	Median Gross Rent			\$658
			Families Below Poverty Level			9.1%
<i>Source: 2015 ACS and 2020 D&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

The OCC performed a full-scope review of the Non-MSA AA. The data in this AA was analyzed and presented as one AA for purposes of this performance evaluation. Small farm and small business loans are the bank's primary lending products and were evaluated under the Lending Test. The OCC transaction tested 60 small farm and 60 small business loans that were originated inside the AA for the geographic distribution and borrower income analysis. As discussed above, the OCC placed equal weight on the bank's primary lending products. 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**.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Non-MSA AA is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits poor geographic distribution of loans in the State.

Within the loan sample, FCNB did not originate any small loans to businesses or farms in moderate-income CTs reflecting overall poor distribution. There are two moderate-income CTs in the AA, one in the city of Urbana in Champaign County and one in northern Logan County. The moderate-income CTs are not near the bank's branch locations. Additionally, the moderate-income CT in the Urbana area is heavily banked and primarily residential as opposed to having vast business or farm lending opportunities. There are no low-income CTs in the bank's AA. All the bank's branches are in middle-income CTs.

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 OCC compared the percentage of the number of small loans to businesses originated by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of businesses throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to businesses of other lenders (aggregate data), as demonstrated by CRA aggregate data.

FCNB exhibits poor distribution in the moderate-income CTs when compared to demographic and aggregate lending data. Within the 60-loan sample, FCNB did not originate any small loans to businesses located in the moderate-income CTs in the AA. However, there are only two moderate-income CTs in the AA, one of which has strong competition and the other is not near the bank's branches.

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 OCC compared the percentage of the number of small loans to farms originated by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of farms throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to farms of other lenders (aggregate data), as demonstrated by CRA aggregate data.

FCNB exhibits reasonable geographic distribution of small loans to farms. Within the 60-loan sample, FCNB did not originate any small loans to farms located in the moderate-income CTs in the AA. However, the distribution is reasonable given that the aggregate (1.5 percent) and demographic (3.5 percent) data in the AA were overall low. Aggregate data showed there were 132 farm loans originated in the AA during the evaluation period and approximately two (1.5 percent) were originated in moderate-income CTs. Farm lending opportunities are limited in the moderate-income CTs. Of the two moderate-income CTs in the AA, one is in a city area where farming is not as prevalent and the other is not near any of the bank's branches.

Distribution of Loans by Income Level of the Borrower

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

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 OCC compared the percentage distribution of the number of small loans to businesses originated by the bank by gross annual revenue level to businesses with gross annual revenues of \$1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small business data, as demonstrated by CRA aggregate data.

FCNB exhibits an excellent distribution of small loans to businesses of different sizes within the AA. As evidenced in Table R in appendix D, FCNB's percentage of small loans to businesses significantly exceeds both demographic and aggregate lending data, representing excellent performance.

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 OCC compared the percentage distribution of the number of small loans to farms originated by the bank by gross annual revenue level to farms with gross annual revenues of \$1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small farm data, as demonstrated by CRA aggregate data.

FCNB exhibits a reasonable distribution of small loans to farms of different sizes within the AA. As evidenced in Table T in appendix D, FCNB's percentage of farm loans to farms with annual gross revenues of \$1 million or less significantly exceeds CRA aggregate lending data, but is below the percentage of farms with annual gross revenues of \$1 million or less (demographic data). In the lending analysis, the OCC considered performance context factors, including strong competition in the AA.

Responses to Complaints

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

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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:	01/01/18 – 12/31/20	
Bank Products Reviewed:	Small business and small farm loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
Non-MSA AA	Full-Scope	The Non-MSA AA includes Champaign County in its entirety, CTs 40, 41, 42 and 43 in Logan County, CT 9722 in Shelby County, and CT 3901 in Miami County.

Appendix B: Summary of State Ratings

Ratings: The First Central National Bank of St. Paris	
Overall Bank:	Lending Test Rating:
The First Central National Bank of St. Paris	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 CT 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 (MD): As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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.

State of Ohio

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018-20

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA	60	2,799	100.0	706	0.0	0.0	0.0	8.4	0.0	8.2	73.0	96.7	70.8	18.5	3.3	21.0	0.0	0.0	0.0
Total	60	2,799	100.0	706	0.0	0.0	0.0	8.4	0.0	8.2	73.0	96.7	70.8	18.5	3.3	21.0	0.0	0.0	0.0

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018-20

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Non-MSA	60	2,799	100.0	706	83.9	96.7	50.0	4.3	3.3	11.9	0.0
Total	60	2,799	100.0	706	83.9	96.7	50.0	4.3	3.3	11.9	0.0

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018-20

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Non-MSA	60	3,108	100.0	132	0.0	0.0	0.0	3.5	0.0	1.5	73.3	98.3	75.0	23.3	1.7	23.5	0.0	0.0	0.0
Total	60	3,108	100.0	132	0.0	0.0	0.0	3.5	0.0	1.5	73.3	98.3	75.0	23.3	1.7	23.5	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 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 2018-20

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Non-MSA	60	3,108	100.0	132	97.9	83.3	62.9	0.7	6.7	1.4	10.0
Total	60	3,108	1000	132	97.9	83.3	62.9	0.7	6.7	1.4	10.0

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%.