



## **PUBLIC DISCLOSURE**

February 22, 2022

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

Liberty National Bank  
Charter Number: 5425

118 South Main Street  
Ada, OH 45810

Office of the Comptroller of the Currency

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 more than reasonable.
  - A majority of the bank's loans are inside its assessment areas (AAs).
  - The bank exhibits a reasonable distribution of loans to individuals of different incomes and businesses of different sizes.
  - The bank exhibits a reasonable geographic distribution of loans in its AAs.
  - The bank has not received any complaints about its Community Reinvestment Act (CRA) performance in helping to meet the AAs' credit needs during the evaluation period.
  - In Allen County, Ohio, the bank's lending performance is consistent with the bank's AAs.

### Loan-to-Deposit Ratio

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

Liberty National Bank's (hereafter "LNB" or "bank") quarterly average LTD ratio over the 12 quarters since the previous CRA evaluation (March 31, 2019 to December 31, 2021) is 88.8 percent. The ratio ranged from a high of 95.1 percent at December 31, 2020, to a low of 77.6 percent at December 31, 2021. The bank's quarterly average LTD ratio of 88.8 percent is more than reasonable when compared to financial institutions of similar size in the bank's AAs, which includes 14 financial institutions with total assets less than \$1 billion and that are headquartered in one of the bank's AAs. The other 14 financial institutions have an average LTD ratio of 80.1 percent. LNB is ranked eighth highest out of the similarly situated financial institutions in the AAs for average LTD ratio during the evaluation period. LNB sells a majority of the home mortgage loan originations to the secondary market, with \$74.9 million sold during the evaluation period (2018, 2019, and 2020).

### Lending in Assessment Area

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

The bank originated and purchased 63.8 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		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	473	63.2	276	36.8	749	95,974	62.6	57,348	37.4	153,322

Small Business	43	71.7	17	28.3	60	4,992	64.6	2,733	35.4	7,725
<b>Total</b>	<b>516</b>	<b>63.8</b>	<b>293</b>	<b>36.2</b>	<b>809</b>	<b>100,966</b>	<b>62.7</b>	<b>60,081</b>	<b>37.3</b>	<b>161,047</b>
<i>Source: 01/01/18 – 12/31/20 Bank Data.  Due to rounding, totals may not equal 100.0%.</i>										

The bank's Hardin County branches, specifically the Ada Branch, serve Allen County, Ohio in the Lima, Ohio Metropolitan Statistical Area (MSA) 30620 with both deposit and lending services. The Ada Branch is less than five miles from Allen County. LNB does not operate a branch or a deposit-taking facility in Allen County; therefore, Allen County is not delineated as a separate AA. However, the bank's footprint extends into Allen County with a significant volume of lending and deposit activity. Therefore, the Office of the Comptroller of the Currency (OCC) included a limited scope review of the lending activity in Allen County during the evaluation period (2018 – 2020). There were 101 home mortgage loans originated or purchased in Allen County during the evaluation period. Refer to the "Conclusions for Area Receiving a Limited Scope Review" section below for additional information.

## Description of Institution

LNB is an intrastate community bank wholly owned by a one-bank holding company, Liberty Bancshares, Inc. Both the bank and holding company are headquartered in Ada, Ohio, approximately 80 miles northwest of Columbus, Ohio. As of December 31, 2020, total assets were \$398.5 million with \$307.8 million in net loans and leases, \$323.8 million in total deposits, and \$49.2 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.

The bank operates six full-service banking offices in Franklin, Hardin, Logan, and Union Counties in Ohio. The main office is in Ada, Ohio, in Hardin County. The five additional branches are in Westerville, Kenton, Marysville, and Bellefontaine (two branches). All offices have automated teller machines (ATMs) and drive-thru facilities. The bank operates one off-premise ATM at Ohio Northern University (McIntosh Center). All offices are open during normal business hours, and all offices except Westerville are open on Saturday mornings. The bank offers internet and mobile banking as well. As of the 2015 American Community Survey (ACS) U.S. Census Data, the Marysville, Kenton, and Bellefontaine South offices are in moderate-income census tracts (CTs), with the remaining offices in middle-income CTs. Since the prior CRA evaluation, there were no branch openings or closings.

LNB is a single-state financial institution with one rating area (State of Ohio) and two AAs in Ohio. The AAs are contiguous, meet the requirements of the regulation, and do not arbitrarily exclude any low- and moderate-income (LMI) CTs. One AA includes Hardin and Logan counties in a non-metropolitan statistical area (Non-MSA AA). The second AA includes Franklin and Union counties and 15 CTs in southern Delaware County in the Columbus, Ohio MSA 18140 (Columbus MSA AA). Since the prior CRA evaluation in 2019, the bank revised the Columbus MSA AA to include Franklin County, Ohio, in its entirety. The AA is described in the "Scope of the Evaluation" and "Description of Institution's Operations in Ohio" sections in this performance evaluation.

As discussed above, LNB's Ada Branch serves Allen County, Ohio in the Lima, Ohio MSA 30620 with both deposit and lending services. Refer to the "Conclusions for Area Receiving a Limited Scope Review" section for additional information.

As of the December 31, 2020, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Reports (UBPRs), LNB's total loans were approximately \$312 million representing 78 percent of total assets. The bank offers a variety of traditional lending and deposit products and services through its six offices to accommodate its customers, including business, farm, home mortgage, and consumer loans. There are no substantial differences in the business focus or services offered between the bank's branches.

The bank's primary lending focus is commercial and industrial loans and commercial real estate loans (business loans or small loans to businesses) as well as residential real estate loans (home mortgage loans). The bank's loan portfolio, as of the December 31, 2020, Call Report, is comprised of business loans of 66 percent, residential real estate loans of 27 percent (includes multi-family real estate loans), farm loans of 7 percent, and less than 1 percent in consumer loans. LNB sells a majority of their home mortgage loan originations to the secondary market but retains servicing.

The bank is responsive to the community development (CD) needs in the AAs. In addition to traditional mortgage products, the bank participates in the Federal Home Loan Bank's (FHLB) Welcome Home Grant Program which is designed to remove down-payment and closing cost obstacles for LMI residents. In 2019 and 2020, the bank assisted 36 borrowers with FHLB Welcome Home grants totaling \$187,500. The bank also waives application fees on these loans. The bank participates in the State of Ohio Treasury programs to assist borrowers including GrowNow, Eco-Link, and Ag-Link. The bank offers Small Business Administration (SBA) guaranteed loans and U.S. Department of Agriculture (USDA)/Guaranteed Rural Housing loans. The bank has a first-time homebuyer loan product in which the bank waives the processing fee if the customer pays the closing costs. In addition to the above loan products, LNB is involved in many CD opportunities through donations and/or employees serving the organizations with financial expertise. Some of the organizations include Hardin County Habitat for Humanity, Hardin Metropolitan Housing, and United Way. The bank partners with EverFi Financial Literacy to bring a financial literacy program to local schools at no cost to the schools or taxpayers.

The global Coronavirus Disease (also referred to as COVID-19) pandemic in 2020 impacted the local economy, including unemployment data. The SBA's Paycheck Protection Program (PPP) provided loans to help businesses keep their workforces employed during the COVID-19 crisis. The bank was responsive to the SBA's PPP and originated a significant volume of PPP loans in 2020 (306 PPP loans totaling \$27 million), given the bank's size and capacity. LNB originated PPP loans in 74 different cities throughout 27 Ohio counties.

Presently, there are no financial, legal, or other factors impeding LNB's ability to help meet the credit needs of its AAs. LNB's previous CRA rating was "Outstanding" as of the CRA Performance Evaluation (PE) dated March 18, 2019.

## **Scope of the Evaluation**

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

The OCC conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its entire community, including 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, LNB's primary lending focus is business and home mortgage lending. Based on the dollar volume of originated and purchased loans during the evaluation period, business loans accounted for approximately 75 percent, home mortgage loans accounted for 23 percent, and farm loans accounted for 2 percent of total loan originations and purchases, with less than 1 percent in consumer loans. Based on the number of originated and purchased loans during the evaluation period, business loans accounted for approximately 42 percent, home mortgage loans accounted for 52 percent, farm loans accounted for 2 percent, and consumer loans accounted for 4 percent of total loan originations and purchases.

The OCC evaluated the bank's lending performance based on the primary products, small business and home mortgage lending. While the bank offers other lending products, 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.

During the evaluation period, the bank originated and purchased a significant volume of lending in Allen County, Ohio. With no branch or deposit-taking facility in Allen County, the bank cannot delineate it as an AA. However, given the significant volume of lending in Allen County and the bank adequately serving their AAs, the OCC included a limited-scope review of county-wide lending in Allen County. Refer to the "Conclusions for Area Receiving a Limited Scope Review" section below for more details.

The lending analysis included all home mortgage loans reported in the Home Mortgage Disclosure Act (HMDA) Loan Application Registers for 2018, 2019, and 2020. To evaluate the bank's performance during the evaluation period for small loans to businesses, the OCC relied on internal bank reports. The OCC completed transaction testing on a random sample of small loans to businesses for each year in the lending evaluation period and for each AA. For the lending inside/outside the AA analysis, the OCC selected 20 small loans to businesses for each year in the lending evaluation period, totaling 60 loans. For the borrower and geographic distribution analyses, the OCC added loans to ensure at least 60 total loans per AA.

For analysis purpose, the OCC compared the bank's lending performance with demographic data from the 2015 ACS U.S. Census data and 2020 Dun and Bradstreet (D&B) data. 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 AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, 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.

LNB has two AAs, as described above. The OCC completed a full-scope review for each AA, the Non-MSA AA and the Columbus MSA AA. The bank's AAs remained the same throughout the evaluation period. A community profile for each AA is provided in the "Description of Institution's Operations in Ohio" section of this evaluation.

## **Ratings**

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

LNB operates in the State of Ohio, with all branches in Franklin, Hardin, Logan, and Union Counties. The State of Ohio rating is based on the performance in the bank's Non-MSA AA and Columbus MSA AA. Four of the bank's six branches are in the Non-MSA AA, including the main office.

The OCC placed more weight on the performance in the Non-MSA AA, as the majority of the deposits (91.7 percent as of the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2021) and lending activity during the evaluation period were in the Non-MSA AA. As of the HMDA data for the evaluation period, as displayed in Tables O and P in the State of Ohio section of appendix D of this evaluation, 66.6 percent of the home mortgage loans were originated in the Non-MSA AA and 33.4 percent in the Columbus MSA AA. As of the bank's internal reports (Internal Bank Report – 2018, 2019, and 2020 CRA Performance Reviews), approximately 73 percent of the small business loan originations inside the AA were originated or purchased in the Non-MSA AA, with 27 percent originated in the Columbus MSA AA. LNB is a small business lender, with 75 percent of the total loan originations, by dollar volume, during the evaluation period being business loans, and as such the OCC placed more weight on small business lending.

## **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<sup>1</sup>:** 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 of different sizes.
- The bank exhibits a reasonable geographic distribution of loans in the AAs.
- LNB has not received any complaints about its CRA performance in helping to meet the AAs' credit needs during the evaluation period.
- In Allen County, Ohio, the bank's lending performance is consistent with the bank's AAs.

### Description of Institution's Operations in Ohio

LNB designated two AAs in the State of Ohio, the Non-MSA AA and the Columbus MSA AA. The bank selected the AAs based on their targeted lending area and branch locations. The AAs are contiguous, meet the requirements of the regulation, and do not arbitrarily exclude any LMI CTs. The bank is headquartered in Hardin County in the Non-MSA AA, with a majority of the lending and deposit activity in the Non-MSA AA, as discussed above under the "Scope of the Evaluation - Ratings" section.

#### 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)	18	0.0	22.2	55.6	22.2	0.0
Population by Geography	77,220	0.0	18.6	60.0	21.4	0.0
Housing Units by Geography	36,271	0.0	21.0	60.0	19.0	0.0
Owner-Occupied Units by Geography	21,910	0.0	16.5	58.4	25.1	0.0
Occupied Rental Units by Geography	8,270	0.0	28.6	59.1	12.3	0.0
Vacant Units by Geography	6,091	0.0	26.8	66.8	6.3	0.0
Businesses by Geography	3,517	0.0	23.2	57.8	19.1	0.0
Farms by Geography	381	0.0	13.4	54.9	31.8	0.0
Family Distribution by Income Level	20,419	19.9	17.8	21.8	40.6	0.0
Household Distribution by Income Level	30,180	21.9	16.0	19.3	42.9	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$109,868

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



	Median Gross Rent	\$665
	Families Below Poverty Level	11.9%
<i>Source: 2015 ACS and 2020 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>		

The Non-MSA AA includes Hardin and Logan counties in Ohio. The data in the above table is for those counties only. LNB has four branches in the Non-MSA AA, including the main office in Ada, Ohio, in Hardin County in a middle-income CT. The Kenton Branch is also located in Hardin County, but in a moderate-income CT. There are two branches in Logan County, both in Bellefontaine. One is in a middle-income CT (North Branch) and one is in a moderate-income CT (South Branch). All four branches have ATMs. The demographics and economies of these two rural counties are substantially similar, so the OCC considered the two counties as one AA. For Hardin County, the largest city and county seat is Kenton. For Logan County, the largest city and county seat is Bellefontaine.

According to the 2015 ACS U.S. Census data, the population of the AA is 77,220, with 18.6 percent living in moderate-income CTs, 60 percent living in middle-income CTs, and 21.4 percent living in upper-income CTs. There are no low-income CTs in the Non-MSA AA. The AA comprises 18 CTs, of which 22.2 are moderate-income, 55.6 percent are middle-income, and 22.2 percent are upper-income CTs. The AA includes 20,419 families and 30,180 households. The Federal Financial Institutions Examination Council's (FFIEC) weighted average median family income (updated for each year) for the Non-MSA AA was \$61,400 for 2018, \$61,000 for 2019, and \$63,400 for 2020. There were no CT classification changes and no designated distressed or underserved CTs in the AA during the evaluation period.

According to the 2015 ACS U.S. Census Data, the median housing value in the Non-MSA AA was \$109,868. Based on the weighted average of Census MSA Median Family Income of \$55,785 in the table above, low-income families make less than \$27,893 and moderate-income families make at least \$27,893 but less than \$44,628. Overall median housing values are approximately 2.5 to 3.9 times the weighted average of Census MSA median family income of the LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. As of the 2015 ACS U.S. Census, there are 36,271 total housing units in the Non-MSA AA, of which 60.4 percent are owner-occupied, 22.8 percent are rental occupied units, and 16.8 are vacant units. Approximately 11.9 percent of the families live below the poverty level. Families below the poverty level make it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

A majority of the bank's lending was inside the Non-MSA AA, as discussed in the "Scope of the Evaluation - Ratings" section above. As stated above, LNB's primary business focus includes small loans to businesses and home mortgage loans. LNB ranks third out of 187 lenders in the AA in residential home mortgage volume based on the 2020 Peer Mortgage Data and 2015 ACS U.S. Census Data. LNB had a 6.4 percent lending market share as of the 2020 Peer Mortgage Data Report. Top mortgage lenders in the AA also include Huntington National Bank and Honda Federal Credit Union, with a combined market share of 17.7 percent. During the evaluation period, 66.6 percent of the bank's home mortgage loan originations and purchases inside the AA were in the Non-MSA AA.

Many 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, 78.1 percent of the businesses located in the AA

have gross annual revenues of \$1 million or less and 62.2 percent have fewer than five employees. Only 2.5 percent of the businesses are headquartered in the bank's AA, and 84.9 percent operate from a single location. LNB is not included in the peer small business data report as the bank is not required to report CRA small business loan data.

Competition in the AA is strong with state and national banks, savings associations, and branches of larger financial institutions. Competitors with significant deposit market share as of June 30, 2021, include Huntington National Bank and Citizens Federal Savings and Loan Association. These two financial institutions account for approximately 27.5 percent of the total deposit market share in the Non-MSA AA. As of the June 30, 2021, FDIC's Deposit Market Share Report, there were 18 financial institutions operating 30 banking offices in the Non-MSA AA, including LNB. The June 30, 2021, FDIC deposit market share data shows LNB's \$342.3 million in total deposits in the AA ranks first in overall deposit market share at 24.6 percent. Additionally, 91.7 percent of the total deposits at June 30, 2021, were in the Non-MSA AA.

During 2018 – 2019, the economic conditions in the Non-MSA AA were overall stable. For 2020, COVID-19 was challenging to the economy with higher unemployment rates. The “not seasonally adjusted” unemployment rates as of December 2020 were 5.1 percent in Hardin County and 4.3 percent in Logan County, which were reasonable when compared with the Ohio unemployment rate of 5.2 percent and national rate of 6.5 percent (Ohio Department of Job and Family Services – Office of Workforce Development – Bureau of Labor Market Information). As of December 2021, the unemployment rates in both Hardin (3.2 percent) and Logan (2.9 percent) counties improved and were favorable when compared to the Ohio unemployment rate of 3.4 percent and national rate of 3.7 percent.

The AA has a diverse employer base with many industries including manufacturing, agriculture, trade, services, and government. Primary employers in Hardin County include Graphic Packaging International, Ohio Northern University, and the Hardin County Government. Large employers in Logan County include Honda of America Manufacturing, Inc., Honda Transmission Manufacturing, Inc., Midwest Express, and county and city government.

As part of the CRA performance evaluation, the OCC reviewed information provided from two interviews with representatives from affordable housing organizations. The contacts identified affordable housing as a credit need in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

#### Columbus MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Columbus MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	309	19.7	25.2	24.3	29.8	1.0
Population by Geography	1,347,538	13.3	24.4	26.4	34.9	1.0
Housing Units by Geography	585,727	15.0	25.2	26.3	33.1	0.3
Owner-Occupied Units by Geography	296,505	6.7	20.6	28.3	44.3	0.0
Occupied Rental Units by Geography	230,874	20.9	30.2	25.6	22.7	0.5
Vacant Units by Geography	58,348	33.9	28.7	18.9	17.8	0.7

Businesses by Geography	108,697	10.8	18.7	24.4	45.4	0.6
Farms by Geography	2,143	7.9	19.2	31.0	41.7	0.2
Family Distribution by Income Level	315,173	23.2	16.8	18.7	41.4	0.0
Household Distribution by Income Level	527,379	25.0	16.5	17.1	41.4	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$161,749
			Median Gross Rent			\$854
			Families Below Poverty Level			11.8%
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.						

The Columbus MSA AA includes Franklin and Union Counties and 15 CTs in southern Delaware County in the Columbus, Ohio MSA 18140. There are seven additional counties in the Columbus, Ohio MSA 18140 (Fairfield, Hocking, Licking, Madison, Morrow, Perry, and Pickaway); however, they are not included in the bank's AA. The data in the above table is for those three counties in the bank's AA only. Since the previous CRA performance evaluation in 2019, the bank updated their AA to include all of Franklin County, instead of just 22 CTs in northern Franklin County. LNB has two branches in the Columbus MSA AA. The Westerville Branch is in Franklin County in a middle-income CT. The Marysville Branch is in Union County in a moderate-income CT. Both branches have ATMs. Franklin County is home to the city of Columbus, which is the largest city and county seat in Franklin County. Franklin County is larger in population than all other counties in the Columbus MSA. The largest city and county seat of Union County is Marysville. The largest city and county seat of Delaware County is Delaware.

According to the 2015 ACS U.S. Census data, the population of the AA is 1,347,538, with 13.3 percent living in low-income CTs, 24.4 percent living in moderate-income CTs, 26.4 percent living in middle-income CTs, 34.9 percent living in upper-income CTs, and 1 percent living in geographies that have not been assigned an income classification. The AA comprises 309 CTs, of which 19.7 are low-income, 25.2 percent are moderate-income, 24.3 percent are middle-income, 29.8 percent are upper-income CTs, and 1 percent are in geographies that have not been assigned an income classification. The AA includes 315,173 families and 527,379 households. The FFIEC's weighted average median family income (updated for each year) for the Columbus MSA AA was \$76,000 for 2018, \$77,900 for 2019, and \$84,600 for 2020. There were no CT classification changes and no designated distressed or underserved CTs in the AA during the evaluation period.

According to the 2015 ACS U.S. Census Data, the median housing value in the Columbus MSA AA was \$161,749. Based on the weighted average of Census MSA Median Family Income of \$70,454 in the table above, low-income families make less than \$35,227 and moderate-income families make at least \$35,227 but less than \$56,363. Overall median housing values are approximately 2.9 to 4.6 times the weighted average of Census MSA median family income of the LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. As of the 2015 ACS U.S. Census, there are 585,727 total housing units in the Columbus MSA AA, of which 50.6 percent are owner-occupied, 39.4 percent are rental occupied units, and 10 are vacant units. Approximately 11.8 percent of the families live below the poverty level. Families below the poverty level make it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

A majority of the bank's lending was inside the Non-MSA AA, as discussed in the "Scope of the Evaluation - Ratings" section above. As stated above, LNB's primary business focus includes small loans to businesses and home mortgage loans. LNB ranks 102<sup>nd</sup> out of 562 lenders in the AA in residential home mortgage volume based on the 2020 Peer Mortgage Data and 2015 ACS U.S. Census Data. LNB had less than 1 percent of residential home mortgage lending market share as of the 2020 Peer Mortgage Data Report. Top mortgage lenders in the AA include Huntington National Bank, Union Savings Bank, JPMorgan Chase Bank, National Association (N.A.), Quicken Loans, LLC, and U.S. Bank, N.A., with a combined market share of 26.7 percent. During the evaluation period, 33.4 percent of the bank's home mortgage loan originations and purchases inside the AA were in the Columbus MSA AA.

Many 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, 83.6 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 63.4 percent have fewer than five employees. Only 2.2 percent of the businesses are headquartered in the bank's AA, and 87.8 percent operate from a single location. LNB is not included in the peer small business data report as the bank is not required to report CRA small business loan data.

Competition in the AA is strong with state and national banks, savings associations, and branches of larger financial institutions. Competitors with significant deposit market share as of June 30, 2021, include Huntington National Bank, JPMorgan Chase Bank, N.A., PNC Bank, N.A., Fifth Third Bank, N.A., and Bank of America, N.A. These five banks account for approximately 86 percent of the total deposit market share in the Columbus MSA AA. As of the June 30, 2021, FDIC's Deposit Market Share Report, there were 42 financial institutions operating 372 banking offices in the Columbus MSA AA, including LNB. The June 30, 2021, FDIC deposit market share data shows LNB's \$30.9 million in total deposits in the AA ranks 34<sup>th</sup> in overall deposit market share at 0.03 percent. Additionally, 8.3 percent of the total deposits at June 30, 2021, were in the Columbus MSA AA.

During 2018 – 2019, the economic conditions in the Columbus MSA AA were overall stable. The economy was trending up, the housing market was strong, and unemployment was at historically low levels. For 2020, COVID-19 was challenging to the economy with higher unemployment rates. The "not seasonally adjusted" unemployment rates as of December 2020 were 4.9 percent in Franklin County and 3.6 percent in Delaware and Union Counties, which were favorable when compared with the Ohio unemployment rate of 5.2 percent and national rate of 6.5 percent (Ohio Department of Job and Family Services – Office of Workforce Development – Bureau of Labor Market Information). As of December 2021, the unemployment rates in Franklin (2.9 percent), Union (2.4 percent), and Delaware (2.3 percent) counties improved and were favorable when compared to the Ohio unemployment rate of 3.4 percent and national rate of 3.7 percent.

The AA has a diverse employer base with many industries including manufacturing and services to financial services and government. Major employers in Franklin County include The Ohio State University, OhioHealth, L Brands, and the State of Ohio government. Primary employers in Delaware County include JP Morgan Chase Bank, N.A., Anthem Blue Cross Blue Shield, Kroger, and DHL Express. Large employers in Union County include Honda of America Manufacturing, Inc., Midwest Express, The Scotts Miracle Grow Company, and Memorial Health.

As part of the CRA performance evaluation, the OCC reviewed information provided from two interviews with representatives from affordable housing organizations. The contacts identified

affordable housing as a credit need in the community, as well as homeownership counseling. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

## **Scope of Evaluation in Ohio**

The OCC performed full-scope reviews of the Non-MSA AA and the Columbus MSA AA. The data in these AAs were analyzed and presented as two separate AAs for purposes of this performance evaluation. Small business and home mortgage lending are the bank's primary products and were evaluated under the Lending Test.

As discussed above under the "Scope of the Evaluation – Ratings" section, the OCC placed more weight on the performance in the Non-MSA AA, as the majority of the deposits and lending activity during the evaluation period were in the Non-MSA AA. Four of the bank's six branches are in the Non-MSA AA, including the main office. LNB is a small business lender, with 75 percent of the total loan originations, by dollar volume, during the evaluation period being business loans, and as such the OCC placed more weight on small business lending.

## **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 Non-MSA AA and Columbus MSA AA is good.

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

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

There are no low-income CTs in the Non-MSA AA. As of the 2015 ACS U.S. Census data, the bank has four moderate-income CTs in the Non-MSA AA and 61 low-income and 78 moderate-income CTs in the Columbus MSA AA. In the Non-MSA AA, the moderate-income CTs are located within or near the cities of Ada, Kenton, Bellefontaine, and Russells Point. In the Columbus MSA AA, the LMI tracts are located within or near Columbus, Marysville, and Worthington, Ohio.

The OCC placed more weight on lending to small businesses and lending in the Non-MSA AA, as discussed above under the "Scope of the Evaluation - Ratings" section.

## ***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 OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as

demonstrated by HMDA aggregate data.

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

#### *Non-MSA AA*

LNB exhibits an excellent distribution of home mortgage loans in the Non-MSA AA. The percentage of home mortgage loans originated and purchased by the bank in the moderate-income CTs exceeds both the demographic comparator and the aggregate lending data of other HMDA reporters, demonstrating excellent performance. There are no low-income CTs in the Non-MSA AA.

#### *Columbus MSA AA*

LNB exhibits a reasonable distribution of home mortgage loans in the Columbus MSA AA. The percentage of home mortgage loans originated and purchased by the bank in low-income CTs significantly exceeds both demographic and aggregate lending data. The percentage of home mortgage loans originated and purchased by the bank in moderate-income CTs is slightly below aggregate data but is overall reasonable.

#### ***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.

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

#### *Non-MSA AA*

LNB exhibits an overall reasonable distribution of small loans to businesses in the Non-MSA AA, based on the transaction testing sample of 60 loans. The percentage of small loans to businesses originated and purchased by the bank in the moderate-income CTs is below demographic and aggregate data. However, the bank's performance is overall reasonable. There is strong competition for loans in the Non-MSA AA. The bank's internal reports (Internal Bank Report – 2018, 2019, and 2020 CRA Performance Reviews) show approximately 20 to 25 percent of the small business loan originations in moderate-income CTs for 2018 to 2020, providing additional support for overall reasonable performance.

#### *Columbus MSA AA*

LNB exhibits an overall reasonable distribution of small loans to businesses in the Columbus MSA AA, based on the transaction testing sample of 60 loans. The percentage of small loans to businesses originated and purchased by the bank in the LMI CTs is below demographic and aggregate data. However, the bank's performance is overall reasonable. There is very strong competition for loans in

the Columbus MSA AA. The bank's internal reports (Internal Bank Report – 2018, 2019, and 2020 CRA Performance Reviews) show a range of 15 to 24 percent of small business loan originations in LMI CTs for 2018 to 2020, providing additional support for overall reasonable performance.

### ***Lending Gap Analysis***

Overall, the OCC did not identify any unexplained, conspicuous gaps in the lending distribution. The OCC reviewed internal bank reports and maps to identify potential significant gaps in the distribution of loans over the evaluation period.

### **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 of different sizes, given the product lines offered by the bank.

In evaluating the borrower distribution of loans to individuals of different incomes and businesses of different sizes, the OCC considered the level of competition and its effect on limiting the bank's ability to lend, as well as the economic conditions in the AAs.

### ***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 OCC compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

LNB's distribution of home mortgage loans by borrower income level reflects overall reasonable distribution.

### **Non-MSA AA**

LNB's distribution of home mortgage loans by borrower income level in the Non-MSA AA reflects excellent distribution. The bank's percentage of home mortgage loans to low-income borrowers exceeds aggregate lending data but is below demographic data. The bank's percentage of home mortgage loans to moderate-income borrowers exceeds both demographic and aggregate lending data of other HMDA reporters.

The OCC considered other factors in the bank's performance during the review, including the cost of homeownership in the AA as an obstacle to homeownership for low-income borrowers. As stated above, overall median housing values are 3.9 times the weighted average of median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to low-income families. Additionally, 11.9 percent of the families live below poverty.

Competition in the AA is strong. As stated above, LNB is ranked third out of 187 lenders in home

mortgage market share in the Non-MSA AA at 6.4 percent, as of the 2020 Peer Mortgage Data. The top two mortgage lenders in this AA account for almost 18 percent of the home mortgage loan originations.

### *Columbus MSA AA*

LNB's distribution of home mortgage loans by borrower income level in the Columbus MSA AA reflects overall reasonable distribution, given the performance context factors discussed below. The bank's percentage of home mortgage loans to low-income borrowers is below both demographic and aggregate lending data. The bank's percentage of home mortgage loans to moderate-income borrowers is significantly below both demographic and aggregate lending data of other HMDA reporters.

The OCC considered other factors in the bank's performance during the review, including the cost of homeownership in the AA as an obstacle to homeownership for LMI borrowers. As stated above, overall median housing values are 2.9 to 4.6 times the weighted average of median family income of LMI families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to LMI families. Additionally, 11.8 percent of the families live below poverty. The OCC noted that only 50.6 percent of the housing units are owner occupied with 39.4 percent rental occupied.

Competition in the AA is very strong. As stated above, LNB is ranked 102<sup>nd</sup> out of 562 lenders in home mortgage market share at 0.1 percent, as of the 2020 Peer Mortgage Data. The top five mortgage lenders in this AA account for almost 26.7 percent of the home mortgage loan originations and represent financial institutions much larger than LNB.

### ***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.

LNB exhibits a reasonable distribution of small loans to businesses of different sizes.

### *Non-MSA AA*

LNB exhibits a reasonable distribution of small loans to businesses of different sizes within the Non-MSA AA. As evidenced in Table R in the State of Ohio section of appendix D, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeds aggregate lending data, but is below the percentage of businesses with gross annual revenues of \$1 million or less (demographic data).

LNB was responsive to the credit needs of its borrowers during the COVID-19 pandemic in 2020 by participating in the SBA's PPP. As stated above, the bank originated 306 PPP loans totaling \$27 million. Table R in the State of Ohio section of appendix D shows that 26.7 percent of the loans did not have income available, with most of these loans being SBA PPP loans that did not require the disclosure of gross annual revenues.



*Columbus MSA AA*

LNB exhibits a reasonable distribution of small loans to businesses of different sizes within the Columbus MSA AA. As evidenced in Table R in the State of Ohio section of appendix D, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeds aggregate lending data, but is below the percentage of businesses with gross annual revenues of \$1 million or less (demographic data). However, 13.3 percent of the loans did not have income available, with most of these loans being SBA PPP loans that did not require the disclosure of gross annual revenues.

**Responses to Complaints**

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

**Conclusions for Area Receiving a Limited Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in Allen County, Ohio, which is in the Lima, Ohio MSA 30620, is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Because the bank has a significant volume of both lending and deposit activity in Allen County, Ohio, the OCC also conducted a borrower-income distribution analysis in Allen County. LNB's percentage of home mortgage loan originations and purchases to low-income borrowers exceeded aggregate data but was below demographic data. The bank's percentage of home mortgage loan originations and purchases to moderate-income borrowers significantly exceeded both aggregate and demographic data. This is overall consistent with the Non-MSA AA. The bank's percentage of loans to small businesses with annual gross revenues under \$1 million was consistent with the full-scope AAs. Refer to Tables P and R for Allen County, Ohio, in appendix D.

## 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>	1/1/18 – 12/31/20	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA		
<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 - Ohio</b>		
Non-MSA AA	Full-Scope	The Non-MSA AA includes Hardin and Logan Counties in their entirety.
Columbus MSA AA	Full-Scope	The Columbus MSA AA includes all of Union and Franklin Counties and 15 CTs in southern Delaware County in the Columbus, Ohio MSA 18140.

# Appendix B: Summary of State Ratings

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Ratings: Liberty National Bank	
Overall Bank:	Lending Test Rating
Liberty National Bank	Satisfactory
States:	
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 (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

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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 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 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
Columbus MSA AA	158	51,678	33.4	82,654	6.7	10.8	5.1	20.6	14.6	15.9	28.3	29.7	26.6	44.3	44.9	52.3	0.0	0.0	0.0
Non-MSA AA	315	44,297	66.6	2,598	0.0	0.0	0.0	16.5	17.1	14.1	58.4	67.3	62.4	25.1	15.6	23.5	0.0	0.0	0.0
Total	473	95,974	100.0	85,252	6.3	3.6	5.0	20.4	16.3	15.9	30.4	54.8	27.7	43.0	25.4	51.4	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data. 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
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbus MSA AA	158	51,678	33.4	82,654	23.2	5.7	6.9	16.8	5.1	16.8	18.7	20.9	20.3	41.4	42.4	39.7	0.0	25.9	16.3
Non-MSA AA	315	44,297	66.6	2,598	19.9	5.4	4.8	17.8	20.0	16.9	21.8	21.6	23.6	40.6	45.4	37.5	0.0	7.6	17.4
Total	473	95,974	100.0	85,252	23.0	5.5	6.8	16.9	15.0	16.8	18.9	21.4	20.4	41.3	44.4	39.6	0.0	13.7	16.3
Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			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
Columbus MSA AA	60	10,612	50.0	32,197	10.8	6.7	9.1	18.7	15.0	15.7	24.4	43.3	22.3	45.4	35.0	52.6	0.6	0.0	0.3
Non-MSA AA	60	5,407	50.0	662	0.0	0.0	0.0	23.2	15.0	18.6	57.8	68.3	56.3	19.1	16.7	25.1	0.0	0.0	0.0
Total	120	16,019	100.0	32,859	10.5	3.3	8.9	18.9	15.0	15.8	25.4	55.8	23.0	44.6	25.8	52.0	0.6	0.0	0.3
Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 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	
Columbus MSA AA	60	10,612	50.0	32,197	83.6	53.3	41.7	5.4	33.3	10.9	13.3	
Non-MSA AA	60	5,407	50.0	662	78.1	56.7	42.0	5.7	16.7	16.2	26.7	
<b>Total</b>	<b>120</b>	<b>16,019</b>	<b>100.0</b>	<b>32,859</b>	<b>83.5</b>	<b>55.0</b>	<b>41.7</b>	<b>5.4</b>	<b>25.0</b>	<b>11.1</b>	<b>20.0</b>	
Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.												
*The majority of the loans to businesses with revenues not available were SBA PPP loans originated in 2020.												

## Allen County, Ohio

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-20
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Allen County	101	12,882	100.0	4,124	21.7	10.9	8.3	17.0	32.7	20.7	21.6	24.8	24.0	39.7	27.7	36.3	0.0	4.0	10.6
Total	101	12,882	100.0	4,124	21.7	10.9	8.3	17.0	32.7	20.7	21.6	24.8	24.0	39.7	27.7	36.3	0.0	4.0	10.6
Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA 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	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Allen County	32	2,316	100.0	1,166	76.2	43.8	30.4	7.1	12.5	16.7	43.8
Total	32	2,316	100.0	1,166	76.2	43.8	30.4	7.1	12.5	16.7	43.8
Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.											
*The majority of the loans to businesses with revenues not available were SBA PPP loans originated in 2020.											