

PUBLIC DISCLOSURE

September 23, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The National Bank of Adams County of West Union Charter Number 13198

> 218 North Market Street West Union, OH 45693

Office of the Comptroller of the Currency

4555 Lake Forest Drive Suite 520 Cincinnati, OH 45242-3760

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding.

The lending test is rated: Outstanding.

The major factors that support this rating include:

- The bank's 26-quarter average loan-to-deposit (LTD) ratio is reasonable considering demographic and economic limitations of the bank.
- The bank makes a substantial majority of its loans within the identified assessment area (AA).
- Lending to borrowers of different income levels reflects excellent distribution.
- The bank's performance in lending to geographies of different income levels exhibits excellent distribution and supports outstanding performance.

Loan-to-Deposit Ratio

The bank's LTD ratio is reasonable relative to their size, financial condition, and credit needs of the AA.

The bank's LTD ratio is lower than peer. The bank has an average LTD ratio of 53.0 percent over the last 26 quarters. Peer average over the same period is 75.7 percent. Loan demand is negatively affected by the bank's rural geography and stressed economic conditions within the AA. Peer institutions are not limited to the AA and may have higher LTD ratios.

Lending in Assessment Area

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

The bank originated or purchased 88.8 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. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The following table is based on a sample of 40 home mortgage loans and 40 consumer loans originated or purchased during the evaluation period.

		Lendin	g Inside aı	nd Outsie	de of the A	ssessment A	Area				
	Ν	lumber o	of Loans			Dollar A	Amount	of Loans \$(0)00s)		
Loan Category	Insid	le	Outsi	de	Total	Insid	e	Outsid	le	Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)	
Home Mortgage	32	80.0	8	20.0	40	3,769,691	74.5	1,287,326	25.5	5,057,017	
Consumer	39	97.5	1	2.5	40	333,837	98.0	6,977	2.0	340,814	
Total	71	88.8	9	11.3	80	4,103,528	76.0	1,294,303	24.0	5,397,831	

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Loan Sample. Due to rounding, totals may not equal 100.0.

Description of Institution

The National Bank of Adams County (NBAC or bank) is a family-owned and operated community bank. Its only office is in West Union, Ohio, approximately 60 miles east of Cincinnati, Ohio. As of June 30, 2019, NBAC reported total assets of \$83 million and tier 1 capital of \$9.6 million. The office has a drive-up facility and an ATM. The bank is in census tract (CT) 7704, a moderate-income geography. This CT has changed from middle-income at the prior CRA evaluation. NBAC has a single AA consisting of all of Adams County, Ohio. NBAC has no holding company or affiliates.

NBAC's primary business strategy is lending to individuals, mainly residential real estate and small consumer loans. The bank offers a variety of consumer, commercial, and agricultural lending products to meet the credit needs of the community. Net loans and leases represented 49 percent of total assets as of June 30, 2019. Primary lending products are residential real estate by dollar volume and consumer loans by number of loans. The bank originated or purchased 224 residential real estate loans totaling \$16.1 million, and 600 consumer loans totaling \$5.1 million during the evaluation period.

Currently, no legal or financial impediments exist that could restrict the institution's ability to serve the community's credit needs. The bank's prior CRA rating was satisfactory as of the Performance Evaluation dated September 2, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We conducted a full-scope CRA evaluation to assess the bank's record of meeting the credit needs of its entire community, including low-and moderate-income areas. We used the small bank CRA evaluation procedures to assess NBAC's performance. Home mortgage and consumer loans are the bank's primary lending products by dollar volume and number of loans made. We evaluated these products under the Lending Test, which included a random sample of home mortgage loans and consumer loans originated or purchased each year during the lending evaluation period (January 1, 2016, to December 31, 2018). For analysis purposes, we used the 2010 U.S. Census data for loans originated and purchased in 2016 and the 2015 American Community Survey (ACS) U.S. Census data for loans originated and purchased in 2017 and 2018.

Selection of Areas for Full-Scope Review

We completed a full-scope review of the bank's non-MSA AA, which consists of Adams County, Ohio. Refer to the tables in appendices A, B, C, and D for additional information.

Ratings

The bank's overall rating is based on the State of Ohio rating, as NBAC only operates in the State of Ohio. The state rating is based on the full-scope review of the bank's non-MSA AA. During the evaluation period, the bank's highest volume product offering by number of loans is consumer loans, and its largest product by dollar volume is home mortgage loans. Therefore, the bank's rating considers consumer loans and home mortgage loans as primary products.

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: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of loans during the evaluation period.
- The bank exhibits excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.
- A substantial majority of the bank's loans are inside its assessment area.

Description of Institution's Operations in Ohio

The bank's AA consists of all of Adams County, Ohio. The AA is comprised of six CTs numbered 7701-7706 and is not located within, or adjacent to, a metropolitan statistical area (MSA). The AA includes four moderate-income CTs and two middle-income CTs as of the 2015 ACS U.S. Census data. There are no low-or upper-income geographies in the bank's AA. The two middle-income geographies are CTs 7702 and 7703, which are distressed nonmetropolitan tracts. Moderate CTs are 7701, 7704, 7705 and 7706. The AA complies with all regulatory requirements. The CTs in the AA are contiguous and surround the area where the bank is located. There are no conspicuous gaps and the AA does not arbitrarily exclude any low-or moderate-income geographies.

The local economy in the AA is stressed. According to the 2015 ACS, the AA has an estimated population of 28,229, of which 24.0 percent is living below the poverty level. The unemployment rate was 6.3 percent in June 2019, which compares unfavorably with the State of Ohio's unemployment rate of 4.2 percent. Of the AA's 12,848 housing units, 7,495, or 58.3, percent are owner-occupied. The weighted average of Census MSA median family income is \$56,217.

Competition in the AA is moderate and represented by regional financial institutions, as well as locally owned savings and loans and state banks. According to the Federal Deposit Insurance Corporation's database as of June 30, 2019, NBAC had a 16.9 percent market share of total deposits in Adams County. Primary competitors in the AA include First State Bank, Fifth Third Bank, Southern Hills Community Bank, and Woodforest National Bank.

Major employers in Adams County include General Electric Company, Adams County Government, Adams County Regional Medical Center, and Adams County/Ohio Valley Local Schools.

Examiners reviewed information from a community contact conducted in June 2019. The interviewee stated some of the greatest challenges in the area include the lack of affordable housing, adequate medical and dental facilities and resources, reliable transportation for the poor and elderly, and employment opportunities paying higher wages.

Non-MSA AA

Table A – Dem	ographic Iı	nformation	of the Assessn	nent Area		
Assess	sment Area	: Adams Co	ounty AA 2016	i		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	50.0	50.0	0.0	0.0
Population by Geography	28,550	0.0	41.4	58.6	0.0	0.0
Housing Units by Geography	12,867	0.0	45.5	54.5	0.0	0.0
Owner-Occupied Units by Geography	7,826	0.0	42.3	57.7	0.0	0.0
Occupied Rental Units by Geography	2,928	0.0	45.7	54.3	0.0	0.0
Vacant Units by Geography	2,113	0.0	57.2	42.8	0.0	0.0
Businesses by Geography	1,243	0.0	35.5	64.5	0.0	0.0
Farms by Geography	168	0.0	33.3	66.7	0.0	0.0
Family Distribution by Income Level	7,598	31.1	21.0	19.4	28.6	0.0
Household Distribution by Income Level	10,754	34.2	17.6	18.2	30.0	0.0
Median Family Income Non-MSAs - OH		\$52,573	Median Housi	ng Value		\$97,496
			Median Gross	Rent		\$489
			Families Belov	w Poverty Lev	vel	18.8%

Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demo Assessi	-		unty 2017-201			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	66.7	33.3	0.0	0.
Population by Geography	28,229	0.0	57.5	42.5	0.0	0.0
Housing Units by Geography	12,848	0.0	60.8	39.2	0.0	0.0
Owner-Occupied Units by Geography	7,495	0.0	58.4	41.6	0.0	0.0
Occupied Rental Units by Geography	3,363	0.0	67.9	32.1	0.0	0.0
Vacant Units by Geography	1,990	0.0	57.8	42.2	0.0	0.0
Businesses by Geography	1,233	0.0	61.2	38.8	0.0	0.0
Farms by Geography	150	0.0	42.7	57.3	0.0	0.0
Family Distribution by Income Level	7,441	31.5	21.2	18.1	29.2	0.0
Household Distribution by Income Level	10,858	34.9	15.8	17.4	32.0	0.0
Median Family Income Non-MSAs - OH		\$56,217	Median Housi	ng Value		\$90,71
			Median Gross	Rent		\$56
			Families Below	w Poverty Lev	/el	24.0%

Scope of Evaluation in Ohio

We conducted a full-scope review of the bank's AA to assess the bank's record of meeting the credit needs of its entire community, including low-and moderate-income areas. Refer to the Scope of the Evaluation section above for more details.

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the AA.

In 2016, the bank had no low-income census tracts in the Adams County AA, according to 2010 U.S. Census data. The AA included three moderate-income census tracts and three distressed middle-income nonmetropolitan census tracts based on poverty.

In 2017 and 2018, the bank had no low-income census tracts in the Adams County AA, according to 2015 ACS Census data. The AA included four moderate-income census tracts and two distressed middle-income nonmetropolitan census tracts based on poverty and unemployment.

The lending analysis reflected lending in most areas, with no conspicuous gaps in lending.

Home Mortgage Loans

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

The bank exhibits excellent geographic distribution of loans in the Adams County AA.

Lending in 2016 reflects excellent geographic distribution. The bank originated or purchased 30.0 percent of loans in moderate-income CTs, which is below the percentage of home mortgage loans of other home mortgage lenders (aggregate data) of 37.0 percent. However, all three middle-income CTs were distressed middle-income nonmetropolitan CTs based on poverty rates in 2016, including the CT in which the main office is located (7704). This CT includes a majority of the bank's lending and is now a moderate-income tract as of 2017-2018. In 2017-2018, there are two distressed middle-income nonmetropolitan CTs (7702 and 7703) based on both poverty and unemployment rates.

Lending in 2017 and 2018 reflects excellent geographic distribution. The bank originated or purchased 65.0 percent of loans in moderate-income tracts, which includes CT 7704. This exceeds the percentage of aggregate data of other lenders of 50.5 percent and demographic data (percentage of owner-occupied housing units) of 58.4 percent.

Consumer Loans

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

The bank exhibits excellent geographic distribution of loans in the Adams County AA.

Lending in 2016 reflects excellent geographic distribution. The bank originated or purchased 55.0 percent of the loans in moderate-income tracts, which significantly exceeds the 43.2 percent of households located in moderate-income tracts.

Lending in 2017 and 2018 reflects excellent geographic distribution. The bank originated or purchased 65.0 percent of the loans in moderate-income tracts, which exceeds the 61.3 percent of households located in moderate income tracts.

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.

We considered poverty and unemployment rates within the AA in our analysis, which exceed state and national levels. Families below the poverty level in the AA were 18.8 percent. Limited income is a substantial obstacle to credit qualification and reduces the number of loans made to low-and moderate-income borrowers.

Home Mortgage Loans

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

The bank exhibits excellent distribution of loans to individuals of different income levels in the Adams County AA.

The bank exhibited excellent distribution of loans to individuals of different income levels in 2016. NBAC's lending to low-income borrowers was 25.0 percent, which significantly exceeds the aggregate data of other lenders of 9.4 percent. NBAC's lending to moderate-income borrowers was 20.0, which exceeds the aggregate data of 17.8 percent.

The bank exhibited excellent distribution of loans to individuals of different income levels in 2017-2018. NBAC's lending to low-income borrowers was 25 percent, which significantly exceeds the aggregate data of other lenders of 8.8 percent. NBAC's lending to moderate-income borrowers was 10.0 percent, which is below the aggregate data of 24.6 percent. We noted our sample size of 10 loans per

year, for a total of 20 loans, represented only 13.0 percent of total loan originations or purchases in 2017 and 2018.

Consumer Loans

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

The bank exhibits reasonable distribution of consumer loans to individuals of different income levels in the Adams County AA.

The bank exhibited reasonable distribution of consumer loans to individuals of different income levels in 2016. NBAC's lending to low-income borrowers was 35.0 percent, which is comparable to the demographic data (percentage of households) of 34.2 percent. NBAC's lending to moderate-income borrowers was 15.0 percent, which was slightly below the demographic data of 17.6 percent.

The bank exhibited excellent distribution on consumer loans to individuals of different income levels in 2017-2018. NBAC's lending to low-income borrowers was 30.0 percent, which was slightly below demographic data of 34.9 percent. NBAC's lending to moderate-income borrowers was 25.0 percent, which significantly exceeded the demographic data of 15.8 percent. We note that the percentage of households below poverty was 24 percent as of the 2015 ACS U.S. Census data, which may limit lending opportunities to low-income borrowers.

Responses to Complaints

There were no complaints related to the bank's CRA performance 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:	01/01/2016 - 12/31/2018	
Bank Products Reviewed:	Home mortgage, consumer	loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
None		
List of Assessment Areas and Type	e of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
Ohio		
NB Adams County AA	Full-scope	AA includes all CTs in Adams County, Ohio.

Appendix B: Summary of State Ratings

RATINGS The National B	ank of Adams County of West Union
Overall Bank:	Lending Test Rating
The National Bank of Adams County of West Union	Outstanding

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

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 arrogate 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.

	T	otal Home M	ortgage	Loans	Low-	Income	Tracts	Modera	te-Incon	ne Tracts	Middle	e-Income	e Tracts	Upper	-Income	Tracts	Not Availa	able-Inc	ome Tracts
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units		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
NB Adams County AA	20	1,772,168	100.0	405	0.0	0.0	0.0	42.3	30.0	37.0	57.7	70.0	63.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	1,772,168	100.0	405	0.0	0.0	0.0	42.3	30.0	37.0	57.7	70.0	63.0	0.0	0.0	0.0	0.0	0.0	0.0
Due to round	ing, i	Census; 01/01 totals may not l based on a sa	equal 10	0.0			HMDA Aggre	gate Data, "	'" data	not available									

Т	otal Home M	ortgage	Loans	Low-	Income	Tracts	Modera	te-Incon	ne Tracts	Middle	e-Incom	e Tracts	Upper	-Income	e Tracts	Not Availa	able-Inc	ome Tracts
#	\$			Clecumied	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	-		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate
20	2,664,249	100.0	455	0.0	0.0	0.0	58.4	65.0	50.5	41.6	35.0	49.5	0.0	0.0	0.0	0.0	0.0	0.0
20	2,664,249	100.0	455	0.0	0.0	0.0	58.4	65.0	50.5	41.6	35.0	49.5	0.0	0.0	0.0	0.0	0.0	0.0
	# 20	# \$ 20 2,664,249	# \$% of Total 20 2,664,249 100.0	# \$ Total Market 20 2,664,249 100.0 455	#\$% of TotalOverall Overall Market% of Owner- Occupied Housing Units202,664,249100.04550.0	# \$ \$ \$ Overall Total Overall Market \$ </td <td>#\$% of YotalOverall Overall Market% of Owner- Occupied Housing Units% Bank Bank LoansAggregate202,664,249100.04550.00.00.0</td> <td>#% of % of TotalOverall Overall Market% of Owner- Occupied Housing Units% of % Bank Loans% of Owner- Occupied Housing Units202,664,249100.04550.00.00.058.4</td> <td>#\$% of Otal% of Overall Market% of Owner- Occupied Housing Units% Bank LoansAggregate% of Owner- Occupied Housing Units% Bank Loans202,664,249100.04550.00.00.058.465.0</td> <td>#\$% of Otal% of Overall Total% of Overall Market% of Owner- Occupied Housing Units% of Sank Loans% of Owner- Occupied Housing Units% of Owner- Occupied Housing Units% of Sank Loans% of Owner- Occupied Housing Units% of Owner- Owner- Occupied Housing Units% of Owne</td> <td># % of Total Overall Market % of Owner- Occupied Housing Units % of Sank Loans % of Owner- Aggregate % of Owner- Occupied Housing Units % of Owner- Occupied Housing 20 2,664,249 100.0 455 0.0 0.0 0.0 58.4 65.0 50.5 41.6</td> <td>#$\\$$\frac{\%}{0}$ of Total$Overall$ Market$\frac{\%}{0}$ of Owner- Occupied Housing Units$\frac{\%}{0}$ of Owner- Occupied Housing Units$\frac{\%}{0}$ of Owner- Occupied Housing Units$\frac{\%}{0}$ of Owner- Occupied Housing Units$\frac{\%}{0}$ of Owner- Occupied Housing Units$\frac{\%}{0}$ of Owner- Occupied Housing Units$\frac{\%}{0}$ of Owner- Occupied Housing Units$\frac{\%}{0}$ of Owner- Occupied Housing Units$\frac{\%}{0}$ of Owner- Occupied Housing Units$\frac{\%}{0}$ of Owner- Occupied Housing Units$\frac{\%}{0}$ of $\frac{\%}{0}$ of<</br></br></br></br></br></br></br></br></br></br></br></br></br></br></br></br></br></td> <td>#$\\$$\frac{\%}{0}$ of Total$Overall$ Market$\frac{\%}{0}$ of Owner- Occupied Housing Units$\frac{\%}{0}$ of $\frac{\%}{0}$ of</td> <td>#$\\$$\frac{\%}{0 \text{ of }}$ $\mathbf{Total}$$\frac{\%}{0 \text{ of }}$ $\mathbf{Market}$$\frac{\%}{0 \text{ of }}$ $\frac{Market}$$\frac{\%}{0 \text{ of }}$ \frac{Market}<</td> <td>#$\\$$\frac{\%}{0}$ of Total$\frac{9\%}{0}$ of Overall Market$\frac{9\%}{0}$ of Overall Units$\frac{9\%}{0}$ of Overall Units$\frac{9\%}{0}$ of Overall Occupied Housing Units$\frac{9\%}{0}$ of Overall Occupied Housing Units$\frac{9\%}{0}$ of Owner- Occupied Housing Units$\frac{9\%}{0}$ of Owner- Occupied Housing Units9%</td> <td># $\frac{\%}{0 \text{ of }}$ $\frac{\%}{0 \text{ of }}$<</td> <td>#$\\$$\frac{9}{60}$ of Total$\frac{9}{0}$ of Overall Market$\frac{9}{60}$ of Owner- Occupied Housing Units$\frac{9}{60}$ of $\frac{9}{60}$ of $\frac{9}$</td> <td># $\frac{1}{5}$ $\frac{1}{5}$ of $\frac{1}{5}$ of $\frac{1}{5}$ of $\frac{1}{5}$ of $\frac{1}{5}$ $\frac{1}{5}$ of $\frac{1}{5}$</td>	#\$% of YotalOverall Overall Market% of Owner- Occupied Housing Units% Bank Bank LoansAggregate202,664,249100.04550.00.00.0	#% of % of TotalOverall Overall Market% of Owner- Occupied Housing Units% of % Bank Loans% of Owner- Occupied Housing Units202,664,249100.04550.00.00.058.4	#\$% of Otal% of Overall Market% of Owner- Occupied Housing Units% Bank LoansAggregate% of Owner- Occupied Housing Units% Bank Loans202,664,249100.04550.00.00.058.465.0	#\$% of Otal% of Overall Total% of Overall Market% of Owner- Occupied Housing Units% of Sank Loans% of Owner- Occupied Housing Units% of Owner- Occupied Housing Units% of Sank Loans% of Owner- Occupied Housing Units% of Owner- Owner- Occupied Housing Units% of Owne	# % of Total Overall Market % of Owner- Occupied Housing Units % of Sank Loans % of Owner- Aggregate % of Owner- Occupied Housing Units % of Owner- Occupied Housing 20 2,664,249 100.0 455 0.0 0.0 0.0 58.4 65.0 50.5 41.6	# $\$$ $\frac{\%}{0}$ of Total $Overall$ Market $\frac{\%}{0}$ of Owner- Occupied Housing Units $\frac{\%}{0}$ of Owner- 	# $\$$ $\frac{\%}{0}$ of Total $Overall$ Market $\frac{\%}{0}$ of Owner- Occupied Housing Units $\frac{\%}{0}$ of $\frac{\%}{0}$ of	# $\$$ $\frac{\%}{0 \text{ of }}$ \mathbf{Total} $\frac{\%}{0 \text{ of }}$ \mathbf{Market} $\frac{\%}{0 \text{ of }}$ \frac{Market} <	# $\$$ $\frac{\%}{0}$ of Total $\frac{9\%}{0}$ of Overall Market $\frac{9\%}{0}$ of Overall Units $\frac{9\%}{0}$ of Overall Units $\frac{9\%}{0}$ of Overall Occupied Housing Units $\frac{9\%}{0}$ of Overall Occupied Housing Units $\frac{9\%}{0}$ of Owner- Occupied Housing Units 9%	# $\frac{\%}{0 \text{ of }}$ <	# $\$$ $\frac{9}{60}$ of Total $\frac{9}{0}$ of Overall Market $\frac{9}{60}$ of Owner- Occupied Housing Units $\frac{9}{60}$ of $\frac{9}{60}$ of $\frac{9}$	# $\frac{1}{5}$ $\frac{1}{5}$ of $\frac{1}{5}$ of $\frac{1}{5}$ of $\frac{1}{5}$ of $\frac{1}{5}$ $\frac{1}{5}$ of $\frac{1}{5}$

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

*Percentages used based on a sample of 20 home mortgage loans.

	1	Total Home M	ortgage l	Loans	Low-In	come Bo	orrowers	Moderate	-Income	Borrowers	Middle-I	ncome I	Borrowers	Upper-I	ncome B	Borrowers		vailable- Borrowe	
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NB Adams County AA	20	1,772,168	100.0	405	31.1	25.0	9.4	21.0	20.0	17.8	19.4	25.0	27.7	28.6	30.0	32.3	0.0	0.0	12.8
Total	20	1,772,168	100.0	405	31.1	25.0	9.4	21.0	20.0	17.8	19.4	25.0	27.7	28.6	30.0	32.3	0.0	0.0	12.8
0		based on a san			0 0		gage Loan	s by Inco	ome Ca	tegory of	the Borr	ower							2017-1
0			a Distri	ibution	of Home	Mort	gage Loan Borrowers	-		tegory of 1e Borrowei			e Borrowers	Upper-	Income	Borrowers		vailable Borrow	-Income
Fable P: A Assessment		ssment Are	a Distri	ibution Loans f Over	of Home	Mortş -Income	e Borrowers k Aggrega	Modera	nte-Incor	ne Borrower	s Middle	-Income %	Aggregate	9/0	% Bank	Aggregate	0/0	Borrow	-Income ers
0	Asse #	ssment Are	a Distri Aortgage % o Tota	ibution Loans f Over Mark	of Home Low All % Famili	Morta -Income es % Ban Loar	e Borrowers k Aggrega	Modera	nte-Incor % Bank Loan	ne Borrower	rs Middle	-Income % Bank	Aggregate	%	% Bank	Aggregate	%	Borrow % Bank	

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

*Percentages used based on a sample of 20 home mortgage loans.

	Tot	al Consumer	Loans	Low-Incom	e Tracts	Moderate-Inco	ome Tracts	Middle-Incon	ne Tracts	Upper-Incon	ne Tracts	Not Available	e-Income Tracts	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans							
NB Adams County AA	20	177,469	100.0	0.0	0.0	43.2	55.0	56.8	45.0	0.0	0.0	0.0	0.0	
Total	20	177,469	100.0	0.0	0.0	43.2	55.0	56.8	45.0	0.0	0.0	0.0	0.0	

*Percentages used based on a sample of 20 consumer loans.

	Tot	al Consumer I	Loans	Low-Incom	e Tracts	Moderate-Inco	ome Tracts	Middle-Incor	ne Tracts	Upper-Incon	ne Tracts	Not Availabl Tract	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans						
NB Adams West Union	20	157,178	100.0	0.0	0.0	61.3	65.0	38.7	35.0	0.0	0.0	0.0	0.0
Total	20	157,178	100.0	0.0	0.0	61.3	65.0	38.7	35.0	0.0	0.0	0.0	0.0

*Percentages used based on a sample of 20 consumer loans.

	Tot	al Consumer	Loans	Low-Income I	Borrowers	Moderate- Borrow		Middle-Income	Borrowers	Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
NB Adams West Union	20	177,469	100.0	34.2	35.0	17.6	15.0	18.2	40.0	30.0	10.0	0.0	0.0
Total	20	177,469	100.0	34.2	35.0	17.6	15.0	18.2	40.0	30.0	10.0	0.0	0.0

*Percentages used based on a sample of 20 consumer loans.

Table V - Assessn	nent Are	a Distribut	ion of Con	sumer Loans	by Income	e Category of	the Borro	wer					2017-18
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
NB Adams West Union	20	157,178	100.0	34.9	30.0	15.8	25.0	17.4	30.0	32.0	15.0	0.0	0.0
Total	20	157,178	100.0	34.9	30.0	15.8	25.0	17.4	30.0	32.0	15.0	0.0	0.0

*Percentages used based on a sample of 20 consumer loans.