



PUBLIC DISCLOSURE

July 6, 2020

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

The Citizens National Bank of Bluffton
Charter Number 11573

102 South Main Street
Bluffton, Ohio 45817

Office of the Comptroller of the Currency

Central Ohio Field Office
655 Metro Place South, Suite 625
Dublin, Ohio 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.

Table of Contents

Overall CRA Rating.....2
Description of Institution.....3
Scope of the Evaluation.....4
Discriminatory or Other Illegal Credit Practices Review.....6
State Rating.....7
 State of Ohio.....7
Lending Test15
Community Development Test 21
Appendix A: Scope of Examination.....A-1
Appendix B: Summary of State Ratings.....B-1
Appendix C: Definitions and Common Abbreviations.....C-1
Appendix D: Tables of Performance Data.....D-1

Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The Community Development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the State of Ohio 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 income levels and businesses and farms of different sizes.
 - The bank exhibits a reasonable geographic distribution of loans in its AAs.
- The Community Development (CD) Test rating is based on the State of Ohio rating, which is satisfactory. Overall, the bank’s level of CD activity represents adequate responsiveness to CD needs. The level of CD lending is excellent and the level of qualified investments and CD services is adequate.

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.

The Citizens National Bank of Bluffton’s (CNB or the bank) LTD ratio over the 12 quarters since the previous CRA evaluation (June 30, 2017 to March 31, 2020) is 117.5 percent. The ratio ranged from a low of 113 percent at March 31, 2020, to a high of 121.9 percent at December 31, 2018. The bank’s average LTD ratio of 117.5 percent is more than reasonable when compared to other financial institutions of similar size and location (total assets less than \$1 billion and bank offices in the AAs). The bank’s LTD ratio ranks second highest among a total of 16 similarly situated financial institutions in the AAs. The other 15 financial institutions had an average LTD ratio of 80.9 percent, ranging from 49.2 percent to 118.8 percent.

Lending in Assessment Area

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

The bank originated and purchased 79.3 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
	Inside	Outside		Inside	Outside	

	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	1,312	80.5	318	19.5	1,630	171,351	70.8	70,590	29.2	241,941
Small Business	820	79.6	210	20.4	1,030	175,422	76.6	53,445	23.4	228,867
Small Farm	749	76.8	226	23.2	975	90,232	71.3	36,241	28.7	126,473
Total	2,881	79.3	754	20.7	3,635	437,005	73.2	160,276	26.8	597,281

Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data (HMDA and CRA loan data).
Due to rounding, totals may not equal 100.0.

Description of Institution

CNB is an intrastate community bank, which is wholly owned by Citizens Bancshares, Inc., a one-bank holding company. Both the main office and holding company are headquartered in Bluffton, Ohio, approximately 85 miles northwest of Columbus, Ohio. As of December 31, 2019, total assets were \$877.5 million with \$713.5 million in total loans, \$589.3 million in total deposits, and \$89.4 million in tier 1 capital. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

CNB has 11 banking offices in Ohio, with nine full-service offices and two independent drive-thru facilities. The bank has offices in Bluffton, Lima, Elida, Van Wert, Celina, Findlay, Defiance, Springfield, and Toledo. The bank operates eight automated teller machines (ATM) at the offices. The only office without a drive-thru or ATM is the Springfield branch. In April 2018, the bank moved from their Toledo loan production office (LPO) into a full-service branch. No other offices were opened or closed since the last CRA evaluation. The bank's Lima branch and independent drive-thru, Defiance branch, and Springfield branch are in moderate-income census tracts (CTs). All other offices are in middle- or upper-income geographies. Additionally, the bank has a loan production office in Columbus, Ohio, that primarily generates participation loans.

CNB's primary business focus is home mortgage, small business, and small farm lending. Management offers a variety of standard lending and deposit products and services through their full-service banking offices to accommodate their customers, including online banking. There are no substantial differences in the business focus or services offered between the bank's branches. CNB also offers savings accounts and certificates of deposit to depositors across the country through cnbbankdirect.com, totaling over \$2 million as of December 31, 2019. Loan products are not offered through this internet site.

As of the December 31, 2019 Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Reports (UBPR), CNB's net loans of \$703.1 million represented approximately 80.1 percent of its total assets. The composition of loans included residential real estate (home mortgage) of 12.2 percent, commercial/commercial real estate including multifamily residential properties (small business) of 67.5 percent, agriculture (farm) of 19.9 percent, and consumer loans representing 0.4 percent. During the lending evaluation period, the bank sold approximately \$177 million in home mortgage loans to the secondary market.

CNB has four AAs and one rating area, the State of Ohio. The AAs meet the requirements of the CRA regulation and do not arbitrarily exclude low- and moderate-income (LMI) geographies. The AAs are described in the Scope of the Evaluation under "Selection of Areas for Full-Scope Reviews."

CNB's last CRA Performance Evaluation was dated June 12, 2017, and the overall CRA rating was Satisfactory. There are no financial or legal impediments that affected CNB's ability to help meet the credit needs of its AAs during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) conducted a CRA evaluation to assess the bank's record of meeting the credit and CD needs of its entire community, including LMI areas. The OCC used intermediate small bank CRA evaluation procedures to assess the bank's performance under the Lending Test and CD Test. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2017 to December 31, 2019. A separate analysis was conducted for each AA. The CD Test considered CD loans, investments, and services during the evaluation period, June 12, 2017 to December 31, 2019.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

Based on discussions with management and the number and dollar volume of loan origination data supplied by the bank, home mortgage, small business, and small farm loans are the bank's primary lending products and were evaluated under the Lending Test. Based on the number of loans originated and purchased during the evaluation period (2017 – 2019), home mortgages accounted for 40.7 percent, commercial and commercial real estate accounted for 24.6 percent, farm loans accounted for 13.2 percent, and consumer loans accounted for 21.5 percent. Based on the dollar volume of loans originated and purchased during the evaluation period (2017 – 2019), home mortgages accounted for 26.3 percent, commercial and commercial real estate accounted for 48.2 percent, farm loans accounted for 21.7 percent, and consumer loans accounted for 3.8 percent. The OCC used the home mortgage (HMDA data), small business (CRA loan data), and small farm (CRA loan data) loans that were originated and purchased inside the AAs to evaluate CNB's performance relative to the geographic and borrower income distributions.

For analysis purposes, we compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census and the 2019 Dun and Bradstreet (D&B) data. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of 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 metropolitan statistical area (MSA) 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 the 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.

CNB has four AAs in the State of Ohio as described below.

- Allen County, Ohio, in the Lima, OH MSA 30620 (Lima MSA AA);
- Defiance, Hancock, Mercer, Paulding, Putnam, and Van Wert Counties, and CTs 401 and 402 in Auglaize County, Ohio in a non-MSA AA (Non-MSA AA);
- Clark County, Ohio, in the Springfield, OH MSA 44220 (Springfield MSA AA);
- Lucas County, Ohio, in the Toledo, OH MSA 45780 (Toledo MSA AA).

The OCC completed a full-scope review of the Lima MSA AA, Non-MSA AA, and the Toledo MSA AA, with a limited-scope review of the Springfield MSA AA. The Toledo full-service branch was opened in April 2018, with Lucas County added to the AA for 2018 and 2019. Therefore, the lending and CD tests considered only 2018 and 2019 for the Toledo MSA AA. A community profile for each full-scope AA is provided in the “Description of Institution’s Operations in Ohio” in the State of Ohio section of this evaluation.

Ratings

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

CNB operates in the State of Ohio, with all branch offices in Ohio. The State of Ohio rating is based on performance in all bank AAs. Refer to the “Scope” section under the state section for details regarding how the areas were weighted in arriving at the respective ratings.

According to the Federal Deposit Insurance Corporation’s (FDIC) Deposit Market Share Reports as of June 30, 2019, 51.2 percent of the bank’s total deposits were in the Lima MSA AA, with 41.8 percent in the Non-MSA AA, 2.4 percent in the Toledo MSA AA, and 4.6 percent in the Springfield MSA AA. Of the home mortgage loans originated or purchased inside the AAs during the evaluation period, 47.3 percent was in the Lima MSA AA, 47.8 percent was in the Non-MSA AA, 3.7 percent in the Toledo MSA AA, and 1.2 percent in the Springfield MSA AA. Of the small loans to businesses originated or purchased inside the AAs during the evaluation period, 25.5 percent was in the Lima MSA AA, with 69.2 percent in the Non-MSA AA, 2.8 percent in the Toledo MSA AA, and 2.5 percent in the Springfield MSA AA. Of the small loans to farms originated or purchased inside the AAs during the evaluation period, 32.7 percent was in the Lima MSA AA and 66.4 percent was in the Non-MSA AA, with 0 percent in the Toledo MSA AA and 0.9 percent in the Springfield MSA AA.

Home mortgage, small business, and small farm loans are the bank’s primary lending products. However, small farm loans are not a primary product in the Toledo MSA AA. The Toledo office has business lenders, but no agriculture lenders. The primary products for the Toledo MSA AA are home mortgage and small business loans. CNB’s Lima MSA AA and Non-MSA AA are weighted heavier than the Toledo MSA AA and Springfield MSA AA as the bank has a larger retail presence in these two AAs. Approximately 96 percent of all home mortgage, small business, and small farm loans originated/purchased inside the AAs during the evaluation period were in the Lima MSA AA and Non-MSA AA. Additionally, about 93 percent of the total deposits are in the Lima MSA AA and Non-MSA AA. We also considered that the Toledo office was just recently opened in April 2018.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Ohio

CRA rating for the State of Ohio¹: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of loans in the state.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes.
- The bank's responsiveness to CD needs of the AAs through qualified investments and CD services is adequate. The bank's responsiveness to CD needs through CD loans is excellent.

Description of Institution's Operations in Ohio

CNB has four AAs in northwestern Ohio: Lima MSA AA, Non-MSA AA, Toledo MSA AA, and the Springfield MSA AA. The AAs meet the requirements of the regulation and do not arbitrarily exclude LMI geographies. Bank management selected the AAs based on their targeted lending territory, the area with the most deposit and lending activity, and office locations. Each AA is described below.

AA1: Lima MSA AA

CNB's AA1 consists of Allen County, Ohio, in the Lima MSA AA. Lima MSA 30620 includes only Allen County, with no other counties in the MSA. Lima is the county seat of Allen County, and is in northwest Ohio. CNB maintains five offices in this AA including the main office and an independent drive-thru facility in Bluffton, a branch and drive-thru facility in Lima, and a branch in Elida. The offices have ATM access. The Lima office and independent drive-thru are in a moderate-income CT, with the remaining offices in middle- or upper-income CTs. During the evaluation period, the income designation of CTs within the AA consisted of four low-income, eight moderate-income, 14 middle-income, and seven upper-income.

Competition is strong within the AA. As of the June 30, 2019 FDIC's Deposit Market Share Report, there were 11 financial institutions operating 30 banking offices in the AA, including CNB. Approximately 51.2 percent of CNB's total deposits at June 30, 2019, were in the Lima MSA AA. Competition in the AA is primarily large regional and national banks including JPMorgan Chase Bank, National Association, The Huntington National Bank, and First Federal Bank of the Midwest. The June 30, 2019 FDIC deposit market share data shows CNB's \$293.7 million in total deposits in this AA ranks second in market share (16 percent market share) behind JPMorgan Chase Bank, National Association.

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

As stated above, the bank's primary business focus is home mortgage, small business, and small farm lending. CNB ranks fourth out of 138 lenders in the AA in residential home mortgage volume based on the 2018 Peer Mortgage Data and 2015 ACS U.S. Census data. CNB had a 7.3 percent lending market share as of the 2018 Peer Mortgage Data report. Top mortgage lenders in the AA include Superior Credit Union, Inc., The Huntington National Bank, and First Federal Bank of the Midwest. During the evaluation period, 47.3 percent of the bank's home mortgage loan originations and purchases inside the AA were in the Lima MSA AA.

Although not required by regulation, the bank reports small business loans under CRA loan data. As of the 2018 Peer Small Business Data report and the 2015 ACS U.S. Census data, CNB ranks sixth out of 52 lenders in the AA in small business lending. CNB had a 5.3 percent lending market share as of the 2018 Peer Small Business Data report. Top small business lenders in the AA include Chase Bank, NA, Synchrony Bank, American Express National Bank, US Bank NA, and Capital One Bank (USA), NA. During the evaluation period, 25.5 percent of the bank's small business loan originations and purchases inside the AA were in the Lima MSA AA.

The bank reports small farm loans under CRA loan data. As of the 2018 Peer Small Business/Farm Data report and the 2015 ACS U.S. Census data, CNB ranks first out of 10 lenders in the AA in small farm lending. CNB had a 64.1 percent lending market share as of the 2018 Peer Small Business/Farm Data report. Top small farm lenders in the AA include John Deere Financial, F.S.B., Chase Bank USA, NA, and US Bank NA. During the evaluation period, 32.7 percent of the bank's small farm loan originations and purchases inside the AA were in the Lima MSA AA.

The Lima MSA AA's economy is improving. On average, the annual unemployment rates (not seasonally adjusted) for Allen County were at or just below the state unemployment rates for 2017, 2018, and 2019.

Average Annual Unemployment Rate			
	2017	2018	2019
Ohio	5.0	4.5	4.1
Allen County	5.0	4.5	4.0

Major industries include health services, trade, and manufacturing. Primary employers include: Mercy Health/St. Rita's Medical Center, Lima Memorial Health System, Lima Building Trades Council, and Ford Motor Company.

According to 2015 ACS U.S. Census data, the median housing value in the Lima MSA AA was \$99,008. Based on the weighted average of Census MSA median family income of \$56,195 for the Lima MSA AA in Table A below, low-income families make less than \$28,098 (individual income that is less than 50 percent of the area median family income) and moderate-income families make at least \$28,098 but less than \$44,956 (individual income that is at least 50 percent and less than 80 percent of the area median family income). Overall median housing values are approximately 2.2 to 3.5 times the weighted average of Census MSA median family income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among LMI families. As of the 2015 ACS U.S. Census, there are 44,859 total housing units in the Lima MSA AA, of which 59.9 percent are owner-occupied and 29.2 percent are rental occupied units. Approximately 12.7 percent of the families and 17 percent of the households live below the poverty level.

As part of this CRA evaluation, the OCC reviewed information provided from an interview with a representative from an affordable housing or economic development organization. The contact identified affordable housing as a primary need in the community. The contact also identified that home repair loans and grants are also needs in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

The following table shows demographic information for the Lima MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lima MSA AA (2017 – 2019)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	12.1	24.2	42.4	21.2	0.0
Population by Geography	105,196	6.7	18.5	47.6	27.2	0.0
Housing Units by Geography	44,859	7.5	20.1	46.5	25.9	0.0
Owner-Occupied Units by Geography	26,883	2.7	12.8	52.7	31.9	0.0
Occupied Rental Units by Geography	13,103	13.9	29.8	38.2	18.1	0.0
Vacant Units by Geography	4,873	17.2	33.9	34.6	14.4	0.0
Businesses by Geography	6,168	4.8	19.2	44.3	31.7	0.0
Farms by Geography	326	0.6	5.2	75.8	18.4	0.0
Family Distribution by Income Level	26,203	21.7	17.0	21.6	39.7	0.0
Household Distribution by Income Level	39,986	24.7	15.9	16.9	42.5	0.0
Median Family Income MSA - 30620 Lima, OH MSA		\$56,195	Median Housing Value			\$99,008
			Median Gross Rent			\$647
			Families Below Poverty Level			12.7%

*Source: 2015 ACS Census and 2019 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.*

AA2: Non-MSA AA

CNB's AA2 consists of the entire counties of Defiance, Hancock, Mercer, Paulding, Putnam, and Van Wert in Ohio, and CTs 401 and 402 in Auglaize County, Ohio. The Non-MSA AA adjoins the Lima MSA AA. CNB maintains four full-service offices including drive-thru facilities within the Non-MSA AA, with one branch each in Van Wert, Mercer, Hancock, and Defiance counties. All offices have ATM access. The Defiance branch is in a moderate-income CT, and the other three offices are in middle- or upper-income CTs. Van Wert is the county seat of Van Wert County, Celina is the county seat of Mercer County, Findlay is the county seat of Hancock County, and Defiance is the county seat of Defiance County. During the evaluation period, the income designation of CTs within the AA consisted of zero low-income, three moderate-income, 30 middle-income, and 21 upper-income.

Competition is strong within the AA. As of the June 30, 2019 FDIC's Deposit Market Share Report, there were 31 financial institutions operating 114 banking offices in the AA, including CNB. Approximately 41.8 percent of CNB's total deposits at June 30, 2019, were in the Non-MSA AA. Competition in the AA is primarily large regional and national banks including First Federal Bank of the

Midwest, Fifth Third Bank, and First Financial Bank. The June 30, 2019 FDIC deposit market share data shows CNB's \$240.3 million in total deposits in this AA ranks tenth in market share (3.9 percent market share) behind several larger financial institutions.

As stated above, the bank's primary business focus is home mortgage, small business, and small farm lending. CNB ranks seventh out of 230 lenders in the AA in residential home mortgage volume based on the 2018 Peer Mortgage Data and 2015 ACS U.S. Census data. CNB had a 3.2 percent lending market share as of the 2018 Peer Mortgage Data report. Top mortgage lenders in the AA include First Federal Bank of the Midwest, The Huntington National Bank, and Superior Credit Union, Inc. During the evaluation period, 47.8 percent of the bank's home mortgage loan originations and purchases inside the AA were in the Lima MSA AA.

As of the 2018 Peer Small Business Data report and the 2015 ACS U.S. Census data, CNB ranks seventh out of 70 lenders in the AA in small business lending. CNB had a 5.5 percent lending market share as of the 2018 Peer Small Business Data report. Top small business lenders in the AA include Chase Bank USA, NA, American Express National Bank, US Bank, NA, and First Federal Bank of the Midwest. During the evaluation period, 69.2 percent of the bank's small business loan originations and purchases inside the AA were in the Non-MSA AA.

As of the 2018 Peer Small Business/Farm Data report and the 2015 ACS U.S. Census data, CNB ranks first out of 23 lenders in the AA in small farm lending. CNB had a 27.7 percent lending market share as of the 2018 Peer Small Business/Farm Data report. Top small farm lenders in the AA include John Deere Financial, F.S.B., The F&M State Bank, and Chase Bank USA, NA. During the evaluation period, 66.4 percent of the bank's small farm loan originations and purchases inside the AA were in the Non-MSA AA.

The Non-MSA AA is overall stable. On average, the annual unemployment rates (not seasonally adjusted) for the counties within the AA are below the annual average state unemployment rates for 2017, 2018, and 2019.

Average Annual Unemployment Rate			
	2017	2018	2019
Ohio	5.0	4.5	4.1
Defiance	4.9	4.4	4.2
Hancock	3.6	3.4	3.2
Mercer	3.1	2.7	2.6
Paulding	4.4	4.1	3.8
Putnam	3.6	3.3	3.1
Van Wert	3.9	3.5	3.3
Auglaize	3.7	3.3	3.0

The counties in the Non-MSA AA are supported by a diverse mix of companies across many industries, including manufacturing, government, agriculture, and the service industry. Primary employers in Defiance County include Defiance Metal Products Company and GM Powertrain. Primary employers in Hancock County include Marathon Petroleum Co., LLC and Cooper Tire & Rubber Company. Primary employers in Mercer County include Celina City Schools and Celina Aluminum Precision Technology. Primary employers in Paulding County include local school systems and Cooper Farms Inc. Primary employers in Putnam County include Kalida Manufacturing Inc., Progressive Stamping Inc., and Pro-

Tec Coating Company. Primary employers in Van Wert County include Eaton Corporation, Federal Mogul Corporation, and Central Mutual Insurance Company.

According to 2015 ACS U.S. Census data, the median housing value in the Non-MSA MSA AA was \$119,862. Based on the weighted average of Census MSA median family income of \$55,785 for the Non-MSA AA, low-income families make less than \$27,893 and moderate-income families make less than \$44,628. Overall median housing values are approximately 2.7 to 4.3 times the weighted average of Census MSA median family income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among LMI families. As of the 2015 ACS U.S. Census, there are 106,206 total housing units in the Non-MSA AA, of which 69.2 percent are owner-occupied and 22.7 percent are rental occupied units. Approximately 7.8 percent of the families and 10.8 percent of the households live below the poverty level.

As part of this CRA evaluation, the OCC reviewed information provided from interviews with representatives from affordable housing or economic development organizations. Both contacts identified affordable housing as a primary need in the community, including quality affordable rental units. One contact also identified that home repair loans and grants are also needs in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

The following table shows demographic information for the Non-MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA (2017 – 2019)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	0.0	5.6	55.6	38.9	0.0
Population by Geography	245,335	0.0	6.1	49.5	44.5	0.0
Housing Units by Geography	106,206	0.0	6.2	51.4	42.4	0.0
Owner-Occupied Units by Geography	73,531	0.0	3.8	49.7	46.4	0.0
Occupied Rental Units by Geography	24,149	0.0	13.1	52.4	34.5	0.0
Vacant Units by Geography	8,526	0.0	6.8	63.2	30.0	0.0
Businesses by Geography	13,689	0.0	7.4	48.6	44.1	0.0
Farms by Geography	1,880	0.0	1.0	41.4	57.6	0.0
Family Distribution by Income Level	66,829	14.2	16.4	22.4	47.0	0.0
Household Distribution by Income Level	97,680	18.6	16.1	17.7	47.6	0.0
Median Family Income Non-MSAs – OH		\$55,785	Median Housing Value			\$119,862
			Median Gross Rent			\$664
			Families Below Poverty Level			7.8%
<i>Source: 2015 ACS Census and 2019 D&B Data.</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

AA3: Toledo MSA AA

CNB's AA3 consists of Lucas County, Ohio, one of four counties in the Toledo MSA 45780. The bank's Toledo MSA AA does not include the MSA counties of Fulton, Ottawa, and Wood, as the bank

does not have branches in those counties. Toledo is the county seat of Lucas County, in northwest Ohio. The bank's full-service Toledo branch was recently opened in April 2018 in a middle-income CT, with ATM access. The OCC analyzed the lending and CD tests using 2018 and 2019 data only since Lucas County, Ohio, was added as an AA in 2018. During the evaluation period, the income designation of CTs within the AA consisted of 35 low-income, 25 moderate-income, 42 middle-income, 25 upper-income, and one CT that has not been assigned an income classification.

Competition is strong within the AA. As of the June 30, 2019 FDIC's Deposit Market Share Report, there were 17 financial institutions operating 106 banking offices in the AA, including CNB. Approximately 2.4 percent of CNB's total deposits at June 30, 2019, were in the Toledo MSA AA, as the bank just recently opened the full-service branch in 2018. Competition in the AA is primarily large regional and national banks including Fifth Third Bank, The Huntington National Bank, and KeyBank National Association. The June 30, 2019 FDIC deposit market share data shows CNB's \$13.6 million in total deposits in this AA ranks 16th in market share (0.2 percent market share).

The bank's primary business focus in the Toledo MSA AA is home mortgage and small business lending. Prior to opening the full-service branch, CNB's primary focus was commercial real estate loans. Farm loans are not a primary product in this AA. CNB ranks 65th out of 285 lenders in the AA in residential home mortgage volume based on the 2018 Peer Mortgage Data and 2015 ACS U.S. Census data. CNB had a 0.2 percent lending market share as of the 2018 Peer Mortgage Data report. Top mortgage lenders in the AA include The Huntington National Bank, KeyBank National Association, Quicken Loans Inc., and Fifth Third Mortgage Company. During the evaluation period, 3.7 percent of the bank's home mortgage loan originations and purchases inside the AA were in the Toledo MSA AA.

As of the 2018 Peer Small Business Data report and the 2015 ACS U.S. Census data, CNB ranks 32nd out of 86 lenders in the AA in small business lending. CNB had a 0.2 percent lending market share as of the 2018 Peer Small Business Data report. Top small business lenders in the AA include American Express National Bank, PNC Bank N.A., The Huntington National Bank, and Citibank, N.A. During the evaluation period, 2.5 percent of the bank's small business loan originations and purchases inside the AA were in the Toledo MSA AA.

On average, the annual unemployment rates (not seasonally adjusted) for Lucas County were above the state unemployment rates for 2017, 2018, and 2019.

Average Annual Unemployment Rate			
	2017	2018	2019
Ohio	5.0	4.5	4.1
Lucas County	5.9	5.2	4.7

Major industries include manufacturing, education and health services, and county/local government. Primary employers include ProMedica Health Systems, Mercy Health Partners, University of Toledo, and General Motors Corporation (Powertrain).

According to 2015 ACS U.S. Census data, the median housing value in the Toledo MSA AA was \$104,537. Based on the weighted average of Census MSA median family income of \$60,742 for the Toledo MSA AA, low-income families make less than \$30,371 and moderate-income families make less than \$48,594. Overall median housing values are approximately 2.3 to 3.4 times the weighted average of Census MSA median family income of LMI families in the AA. The housing costs relative to income

may have a limiting effect on mortgage demand among LMI families. As of the 2015 ACS U.S. Census, there are 202,269 total housing units in the Toledo MSA AA, of which 53.5 percent are owner-occupied and 34.3 percent are rental occupied units. Approximately 16.5 percent of the families and 20.2 percent of the households live below the poverty level.

As part of this CRA evaluation, the OCC reviewed information provided from interviews with representatives from affordable housing or economic development organizations. Two contacts identified CNB as a partner that provides small annual grants to their non-profit organization or serves on their boards. Affordable housing, financing for rehab projects, foreclosure prevention programs, loans for LMI and minority borrowers, and small business lending are primary needs in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

The following table shows demographic information for the Toledo MSA AA.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	128	27.3	19.5	32.8	19.5	0.8
Population by Geography	436,261	17.1	18.4	36.4	28.1	0.0
Housing Units by Geography	202,269	18.9	19.1	36.8	25.2	0.0
Owner-Occupied Units by Geography	108,258	9.5	16.4	39.5	34.6	0.0
Occupied Rental Units by Geography	69,361	27.2	21.2	36.6	14.9	0.0
Vacant Units by Geography	24,650	36.9	24.9	25.4	12.8	0.0
Businesses by Geography	25,403	16.1	12.2	34.8	36.9	0.0
Farms by Geography	598	6.9	11.9	34.9	46.3	0.0
Family Distribution by Income Level	106,520	26.1	17.1	18.7	38.1	0.0
Household Distribution by Income Level	177,619	28.3	15.8	16.0	40.0	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$60,742	Median Housing Value			\$104,537
			Median Gross Rent			\$671
			Families Below Poverty Level			16.5%

*Source: 2015 ACS Census and 2019 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.*

AA4: Springfield MSA AA

CNB's AA4 consists of Clark County, Ohio, in the Springfield MSA AA. The Springfield MSA AA includes only Clark County, with no other counties in the MSA. Springfield is the county seat of Clark County. In Clark County, the bank has one full-service office, with no drive-thru or ATM. The Springfield branch is in a moderate-income CT. During the evaluation period, the income designation of CTs within the AA consisted of four low-income, 14 moderate-income, 16 middle-income, and 10 upper-income.

Competition is strong within the AA. As of the June 30, 2019 FDIC's Deposit Market Share Report, there were 12 financial institutions operating 35 banking offices in the AA, including CNB.

Approximately 4.6 percent of CNB's total deposits at June 30, 2019, were in the Springfield MSA AA. Competition in the AA is primarily large regional and national banks including The Park National Bank, The Huntington National Bank, and PNC Bank National Association. The June 30, 2019 FDIC deposit market share data shows CNB's \$26.4 million in total deposits in this AA ranks ninth in market share (1.6 percent market share).

As stated above, the bank-wide primary business focus is home mortgage, small business, and small farm lending. However, the bank only originated 15 home mortgages, 23 small business, and seven small farm loans inside the Springfield MSA AA during the evaluation period. Therefore, we could not complete a meaningful analysis of home mortgage or farm lending with less than 20 loans in the evaluation period. CNB had a 0.1 percent lending market share as of the 2018 Peer Mortgage Data report. During the evaluation period, only 1.2 percent of the bank's total home mortgage loan originations and purchases inside the AA were in the Springfield MSA AA.

As of the 2018 Peer Small Business Data report and the 2015 ACS U.S. Census data, CNB ranks 21st out of 62 lenders in the AA in small business lending. CNB had a 0.5 percent lending market share as of the 2018 Peer Small Business Data report. Top small business lenders in the AA include PNC Bank N.A., American Express National Bank, and The Park National Bank. During the evaluation period, 2.8 percent of the bank's total small business loan originations and purchases inside the AA were in the Springfield MSA AA.

On average, the annual unemployment rates (not seasonally adjusted) for Clark County were commensurate with the state unemployment rates for 2017, 2018, and 2019.

Average Annual Unemployment Rate			
	2017	2018	2019
Ohio	5.0	4.5	4.1
Clark County	4.9	4.6	4.3

Major industries include manufacturing, trade, service, and government. Large employers in the county continue to be Mercy Health, Assurant Inc., and Navistar Inc.

According to 2015 ACS U.S. Census data, the median housing value in the Springfield MSA AA was \$103,522. Based on the weighted average of Census MSA median family income of \$55,198 for the Springfield MSA AA, low-income families make less than \$27,599 and moderate-income families make less than \$44,158. Overall median housing values are approximately 2.3 to 3.8 times the weighted average of Census MSA median family income of LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among LMI families. As of the 2015 ACS U.S. Census, there are 61,241 total housing units in the Springfield MSA AA, of which 59.3 percent are owner-occupied and 30.2 percent are rental occupied units. Approximately 13.2 percent of the families and 16.8 percent of the households live below the poverty level.

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

The following table shows demographic information for the Springfield MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA AA (2017 – 2019)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	9.1	31.8	36.4	22.7	0.0
Population by Geography	136,827	7.4	27.0	40.9	24.7	0.0
Housing Units by Geography	61,241	7.8	27.2	40.5	24.5	0.0
Owner-Occupied Units by Geography	36,310	3.1	20.2	46.6	30.1	0.0
Occupied Rental Units by Geography	18,499	14.3	37.6	31.6	16.4	0.0
Vacant Units by Geography	6,432	15.2	37.1	31.3	16.5	0.0
Businesses by Geography	6,043	5.0	27.2	38.0	29.9	0.0
Farms by Geography	367	3.5	17.2	44.1	35.1	0.0
Family Distribution by Income Level	35,980	20.9	17.4	20.9	40.8	0.0
Household Distribution by Income Level	54,809	23.9	16.3	17.9	41.9	0.0
Median Family Income MSA - 44220 Springfield, OH MSA		\$55,198	Median Housing Value			\$103,522
			Median Gross Rent			\$698
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS Census and 2019 D&B Data. Due to rounding, totals may not equal 100.0. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Ohio

The OCC conducted a full-scope review of the Lima MSA AA, Non-MSA AA, and Toledo MSA AA, with a limited review of the Springfield MSA AA. The data in these AAs was analyzed and presented as four AAs for purposes of this evaluation. Home mortgage, small business, and small farm loans are the bank’s lending products and were evaluated under the Lending Test during the evaluation period. The OCC reviewed CD loans, investments, and services in each AA during the evaluation period. Refer to the “Scope of the Evaluation” section for more details.

As stated above under the “Scope of the Evaluation” (Ratings) section, the Lima MSA AA and Non-MSA AA are weighted heavier than the other two AAs due to the bank’s larger retail presence in these AAs. Additionally, the OCC considered only 2018 and 2019 for the Lending and CD tests for the Toledo MSA AA, as Lucas County, Ohio, was added as an AA in 2018 with the opening of the full-service branch in Toledo.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

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

The bank offers flexible home mortgage loan programs including loans insured by the Federal Housing Administration (FHA), U.S. Department of Veterans Affairs (VA), and the U.S. Department of Agriculture (USDA) Rural Housing program, all of which assist LMI borrowers with home ownership. These programs allow for flexible debt service ratios and lower down payments than conventional loans. During the evaluation period, the bank originated approximately \$23 million in FHA, VA, and USDA loans.

Additionally, the bank participates in the State of Ohio's Ag-Link program (agriculture linked deposit program) to assist farm operators and agriculture businesses with their operations.

Conclusions for Areas Receiving Full-Scope Reviews

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

Distribution of Loans by Income Level of the Geography

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

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.

AA1: Lima MSA AA

The bank exhibits a reasonable geographic distribution of loans in the Lima MSA AA, given the performance context factors discussed below.

The percentage of home mortgage loans originated or purchased by the bank in LMI CTs was below both the demographic and aggregate lending data of other HMDA reporters. In the lending analysis, the OCC considered several performance context factors, including significant market competition in the AA. The bank's mortgage lending market share was 7.3 percent as of the 2018 Peer Mortgage Data Report, with CNB ranking fourth out of 138 lenders. Many lenders are competing for the same LMI loans in this AA. As of the 2015 ACS U.S. Census, 1962 was the weighted average year of median housing built, with the median age of housing stock of 74 years for low-income and 66 years for moderate-income CTs. The maintenance costs associated with older housing stock and a median housing value of \$99,008 can be a significant obstacle to homeownership for LMI borrowers, which may result in a reduction of mortgage loan demand. The vast majority of the LMI CTs are in the downtown Lima area, with the bank serving these areas with one branch and drive-thru facility in a moderate-income CT in Lima, Ohio. The other two offices in the Lima MSA AA are in upper-income CTs.

AA2: Non-MSA AA

The bank exhibits a reasonable geographic distribution of loans in the Non-MSA AA.

There are no low-income CTs in the Non-MSA AA. The percentage of home mortgage loans originated or purchased by the bank in moderate-income CTs was near to the demographic data and below aggregate lending data of other HMDA reporters.

In the lending analysis, the OCC considered several performance context factors, including significant market competition in the AA. The bank's mortgage lending market share was 3.2 percent as of the 2018 Peer Mortgage Data Report, with the bank ranking seventh out of 230 lenders behind several large lenders. Many lenders are competing for the same LMI loans in this AA. As of the 2015 ACS U.S. Census, 1967 was the weighted average year of median housing built, with the median age of housing stock of 64 years for moderate-income CTs. The maintenance costs associated with older housing stock and a median housing value of \$119,862 can be a significant obstacle to homeownership for LMI borrowers, which may result in a reduction of mortgage loan demand. One of the bank's four offices in the Non-MSA AA is in a moderate-income CT, with the rest in middle- and upper-income CTs. The Defiance branch in Defiance County, Ohio is in CT 9588, which is a moderate-income CT. Approximately 27.7 percent live below the poverty line in this moderate-income CT in Defiance County.

AA3: Toledo MSA AA

The bank exhibits a reasonable geographic distribution of loans in the Toledo MSA AA.

The percentage of home mortgage loans originated or purchased by the bank in low-income CTs is below both demographic and aggregate data. However, the percentage of home mortgage loans originated or purchased in moderate-income CTs significantly exceeds both the demographic and aggregate lending data of other HMDA reporters.

As of the 2015 ACS U.S. Census, 1960 was the weighted average year of median housing built, with the median age of housing stock over 60 years. The maintenance costs associated with older housing stock can be a significant obstacle to homeownership, which may result in a reduction of mortgage loan demand. Additionally, the bank's only office in this AA was just recently opened in 2018 in a middle-income CT, with strong competition for loans.

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 and purchased by the bank in the four geographic income categories 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) in each AA, as demonstrated by CRA aggregate data.

AA1: Lima MSA AA

The bank exhibits reasonable geographic distribution of small loans to businesses in the Lima MSA AA. The bank originated 207 small loans to businesses in the Lima MSA AA during the evaluation period. The bank's distribution of small loans in the low-income CTs equaled aggregate data and was slightly

below demographic data. The bank's distribution of small loans in the moderate-income CTs was very near to aggregate data, but below demographic data.

AA2: Non-MSA AA

The bank exhibits reasonable geographic distribution of small loans to businesses in the Non-MSA AA. The bank originated 563 small loans to businesses (69.2 percent of all small loans to businesses originations and purchases) in the Non-MSA AA during the evaluation period. There are no low-income CTs in the Non-MSA AA. The bank's distribution of small loans in the moderate-income CTs was below both demographic and aggregate data, but overall reasonable. There are only three moderate-income CTs in the Non-MSA, one in Defiance County and two in Hancock County. As of the 2018 Peer Small Business Data report and the 2015 ACS U.S. Census data, CNB ranks seventh out of 70 lenders, behind several large financial institutions, in the AA in small business lending with a 5.5 percent lending market share.

AA3: Toledo MSA AA

The bank exhibits reasonable geographic distribution of small loans to businesses in the Toledo MSA AA. The bank originated only 20 small loans to businesses in the Toledo MSA AA during the evaluation period. The bank's Toledo office was recently opened in 2018. The bank's distribution of small loans in the low-income CTs was below both demographic and aggregate data. The bank's distribution of small loans in the moderate-income CTs was near to both demographic and aggregate data.

Small Loans to Farms

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

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

AA1: Lima MSA AA

The bank exhibits reasonable geographic distribution of small loans to farms in the Lima MSA AA. The bank originated 245 small loans to farms in the Lima MSA AA during the evaluation period. CNB did not originate any small loans to farms in the low-income CTs; however, aggregate data was the same at 0 percent. The bank's distribution of small loans to farms in the moderate-income CTs was below demographic but near to aggregate data. As of the 2018 Peer Small Business/Farm Data report and the 2015 ACS U.S. Census data, CNB ranks first out of 10 lenders in the AA in small farm lending, with a 64.1 percent lending market share.

AA2: Non-MSA AA

The bank exhibits reasonable geographic distribution of small loans to farms in the Non-MSA AA. The bank originated 497 small loans to farms in the Non-MSA AA during the evaluation period. There are no low-income geographies in this AA. The bank's distribution of small loans to farms in the moderate-income CTs was below demographic and aggregate data; however, aggregate data only shows 0.2 percent of loans made in moderate-income CTs. There are only three moderate-income CTs in this AA, with these CTs near town/city limits where farming is not as prevalent. As of the 2018 Peer Small

Business/Farm Data report and the 2015 ACS U.S. Census data, CNB ranks first out of 23 lenders in the AA in small farm lending, with a 27.7 percent lending market share.

AA3: Toledo MSA AA

The bank did not originate or purchase any farm loans in the Toledo MSA AA during the evaluation period; therefore, a meaningful analysis could not be completed. The bank's Toledo office opened in 2018, with home mortgage and small loans to businesses as primary products in this AA.

Lending Gap Analysis

The OCC conducted a gap analysis and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The 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.

AA1: Lima MSA AA

CNB exhibits a reasonable distribution of loans to individuals of different income levels. The bank's level of home mortgage lending to low-income borrowers was below both demographic and aggregate data. The bank's level of home mortgage lending to moderate-income borrowers exceeded demographic data and was reasonable when compared to aggregate data reported by other HMDA lenders.

The OCC considered the cost of homeownership in the AA as a substantial obstacle to homeownership to LMI borrowers. As stated above, median housing values are approximately 2.2 to 3.5 times the weighted average of median family income of LMI families in the AA. This obstacle results in fewer opportunities to originate mortgage loans to LMI families. Additionally, approximately 12.7 percent of families live below poverty in the Lima MSA AA.

AA2: Non-MSA AA

CNB exhibits a reasonable distribution of loans to individuals of different income levels. The bank's level of home mortgage lending to low-income borrowers was below both demographic and aggregate data. However, the bank's level of home mortgage lending to moderate-income borrowers exceeded demographic data and was reasonable when compared to aggregate data reported by other HMDA lenders.

The OCC considered the cost of homeownership in the AA as a substantial obstacle to homeownership to LMI borrowers. As stated above, median housing values are approximately 2.7 to 4.3 times the weighted average of median family income of LMI families in the AA. This obstacle results in fewer opportunities to originate mortgage loans to LMI families. Additionally, approximately 7.8 percent of families live below poverty in the Non-MSA AA.

AA3: Toledo MSA AA

The bank's level of home mortgage lending to LMI borrowers was below both demographic and aggregate data. However, the bank entered this AA when they opened a full-service branch in 2018. There is significant competition in this AA, and the bank has just recently entered the market.

The OCC considered the cost of homeownership in the AA as a substantial obstacle to homeownership to LMI borrowers. This obstacle results in fewer opportunities to originate mortgage loans to LMI families. Additionally, approximately 16.5 percent of families live below poverty in the Toledo MSA AA.

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 and purchased by the bank (by annual gross revenue level) to businesses with annual gross revenues of \$1 million or less. We also compared the bank's performance to aggregate small business data, as demonstrated by CRA aggregate data.

AA1: Lima MSA AA

The bank's lending to small businesses in the Lima MSA AA is reasonable. During the evaluation period, the bank's level of small business lending to businesses with annual gross revenues less than \$1 million significantly exceeded aggregate data but was lower than demographic data.

AA2: Non-MSA AA

The bank's lending to small businesses in the Non-MSA AA is reasonable. During the evaluation period, the bank's level of small business lending to businesses with annual gross revenues less than \$1 million significantly exceeded aggregate data but was lower than demographic data.

AA3: Toledo MSA AA

The bank's lending to small businesses in the Toledo MSA AA is excellent. During the evaluation period, the bank's level of small business lending to businesses with annual gross revenues less than \$1 million significantly exceeded aggregate data and was very near to demographic data.

Small Loans to Farms

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

The OCC compared the percentage distribution of the number of small loans to farms originated and purchased by the bank (by annual gross revenue level) to farms with annual gross revenues of \$1 million

or less. We also compared the bank's performance to aggregate small farm data, as demonstrated by CRA aggregate data.

AA1: Lima MSA AA

The bank's lending to small farms in the Lima MSA AA is reasonable. During the evaluation period, the bank's level of small farm lending to farms with annual gross revenues less than \$1 million significantly exceeded aggregate data but was lower than demographic data.

AA2: Non-MSA AA

The bank's lending to small farms in the Non-MSA AA is reasonable. During the evaluation period, the bank's level of small farm lending to farms with annual gross revenues less than \$1 million significantly exceeded aggregate data but was lower than demographic data.

AA3: Toledo MSA AA

The bank did not originate any farm loans in the Toledo MSA. Therefore, a meaningful comparative analysis could not be completed.

Responses to Complaints

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

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Springfield MSA AA is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

The bank originated only 15 mortgage loans in the Springfield MSA AA during the evaluation period, which does not allow for a meaningful comparative analysis. No mortgage loans were in low-income CTs, while six mortgage loans were originated in moderate-income CTs. The six loans in the moderate-income CTs exceeds both demographic and aggregate lending data and supports the bank's overall reasonable geographic loan distribution. None of the 15 mortgage loans were originated to LMI borrowers, which is below both demographic and aggregate data. However, the overall low volume of lending in the Springfield MSA AA does not allow for a meaningful comparative analysis; therefore, we did not complete a home mortgage lending analysis for this AA.

The bank originated 23 small loans to businesses in the Springfield MSA AA. Of these loans, no loans were originated in low-income CTs, which is below both demographic and aggregate data. However, the bank's lending to small businesses in moderate-income CTs significantly exceeds both demographic and aggregate data. The bank's level of small business lending to businesses with annual gross revenues less than \$1 million significantly exceeds aggregate data but is lower than demographic data.

The bank only originated seven small loans to farms during the evaluation, which does not allow for a meaningful comparative analysis.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the State of Ohio is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibits overall adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

The number and amount of qualified CD loans represents excellent responsiveness. During the evaluation period, CNB originated 13 CD loans inside their AAs, totaling almost \$6 million which equates to 6.7 percent of total tier 1 capital. Additionally, the bank originated one CD loan in the broader statewide/regional area totaling almost \$55,500.

Community Development Loans				
Assessment Area	Total			
	#	% of Total	\$(000's)	% of Total \$
Lima MSA AA	6	42.9%	\$475	7.9%
Non-MSA AA	6	42.9%	\$5,308	87.8%
Toledo MSA AA	1	7.1%	\$203	3.4%
Springfield MSA AA	0	0.0%	\$0	0.0%
Statewide/Regional Area	1	7.1	\$56	0.9%

*Due to rounding, totals may not equal 100%. The table presents the data for all AAs. The narrative below addresses performance in full-scope areas.

AA1: Lima MSA AA

The bank's CD lending in the Lima MSA AA represents adequate responsiveness to CD needs. In total, \$474,667 in CD lending occurred in the Lima MSA AA, equating to 1 percent of prorated tier 1 capital based on total deposits in the AA.

During the evaluation period, CNB originated six loans within the Lima MSA AA. Five of these six loans were for community service purposes and one was for affordable housing. In 2017, CNB funded two loans totaling \$177,500. In 2018, CNB funded two loans totaling \$47,167, and in 2019 CNB funded two loans totaling \$250,000. Three of these loans were made to a victim's services center for a safe house and operating lines of credit. One loan was made to a neighborhood thrift store that provides services for LMI individuals. Another loan was made to an organization that provides transportation

services to LMI individuals. The affordable housing loan was made to a non-profit housing organization that builds housing for LMI families with below market mortgage rates.

AA2: Non-MSA AA

The bank's CD lending in the Non-MSA AA represents an excellent responsiveness to CD needs. In total, \$5.3 million in CD lending occurred in the Non-MSA AA, equating to 14.2 percent of prorated tier 1 capital based on total deposits in the AA.

During the evaluation period, management made six loans within the Non-MSA AA. Three of these loans were for community service purposes, two were for community revitalization, and one was for affordable housing. In 2017, CNB funded three loans totaling \$5.2 million. In 2018, CNB funded two loans totaling \$83,607, and in 2019 CNB funded one loan totaling \$13,000. Three of these loans were made to a mental health organization for transportation vehicles and an operating line of credit. The affordable housing loan was made for the purchase of a home for LMI individuals. The revitalization loans were made in conjunction with a JobsOhio grant for environmental cleanup and redevelopment of a targeted area, eventually bringing jobs to the congruent moderate-income tract.

AA3: Toledo MSA AA

The bank's CD lending in the Toledo MSA AA represents an excellent responsiveness to CD needs. In total, \$202,500 in CD lending occurred in the Toledo MSA AA, equating to 9.5 percent of prorated tier 1 capital based on total deposits in the AA. During the evaluation period, CNB funded one loan for revitalization/economic development in a low-income CT.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Lima MSA AA	0	0	52	62	52	36.6	62	60.2	0	0
Non-MSA AA	0	0	78	37	78	54.9	37	35.9	0	0
Toledo MSA AA	0	0	8	3	8	5.7	3	2.9	0	0
Springfield MSA AA	0	0	4	1	4	2.8	1	1.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the examination date.

CNB's qualified investment activity represents adequate responsiveness. During the evaluation period, the bank made 142 qualifying investments totaling over \$103,201.

AA1: Lima MSA AA

The number and amount of qualified CD investments in the Lima MSA AA represent adequate responsiveness. During the evaluation period, CNB made 52 qualifying investments totaling \$62,270 to CD organizations. Qualified investments consist of donations and sponsorships to various non-profit organizations. Organizations include homeless shelters, food banks, and underprivileged youth centers.

AA2: Non-MSA AA

The number and amount of qualified CD investments in the Non-MSA AA represent adequate responsiveness. During the evaluation period, CNB made 78 qualifying investments totaling approximately \$36,431 to CD organizations. Qualified investments consist of donations and sponsorships to various non-profit organizations. Organizations include homeless shelters, affordable housing organizations, food banks, and underprivileged youth centers.

AA3: Toledo MSA AA

The number and amount of qualified CD investments in the Toledo MSA AA represent adequate responsiveness. During the evaluation period, CNB made eight qualifying investments totaling \$3,400 to CD organizations. We considered CNB's relatively new presence in this AA in our conclusion, as CNB entered the AA in 2018. Qualified investments consist of donations and sponsorships to various non-profit organizations. Organizations include fair housing organizations, organizations for underprivileged children, and shelters for abused women and children.

Extent to Which the Bank Provides Community Development Services

CNB exhibits adequate responsiveness to CD needs through CD services.

The bank has three branches and one independent drive-thru in moderate income CTs.

CNB has assisted many customers in taking advantage of down payment/closing cost assistance programs targeted to LMI individuals in their AAs. The Federal Home Loan Bank (FHLB) offers a program called "Welcome Home" that provides down payment assistance funds to LMI borrowers who meet specific income criteria. During the evaluation period, CNB originated 55 loans with FHLB Welcome Home grants.

AA1: Lima MSA AA

The provision of CD services in the Lima MSA AA represents adequate responsiveness. Bank employees/officers serve as directors, board committee members or volunteers for 11 qualifying CD organizations. At least four bank employees/officers are actively involved with various CD organizations on a regular basis, sometimes meeting multiple times throughout a year. We note that a bank officer is on the board or committee for various local organizations that assist with the revitalization of downtown Lima, which has many LMI tracts located within the AA. Another bank officer serves on the board of a local economic development organization and serves as the chairman of a revolving loan fund that is an integral part of the organization's activities. The fund is used for loans to businesses that often would not qualify for traditional financing due to the business being a start-up or due to a lack of collateral. One employee is a volunteer with an organization that provides free income tax preparation for LMI taxpayers.

AA2: Non-MSA AA

The provision of CD services in the Non-MSA AA represents adequate responsiveness. CNB employees/officers served as either a director or committee member of 13 qualifying CD organizations. The organizations provide community services to LMI individuals. One bank officer is on the board of

the local chapter of a national affordable housing organization. Bank employees/officers provide financial expertise to the local Habitat for Humanity, United Way, and the Salvation Army as well as other CD organizations.

AA3: Toledo MSA AA

CNB employees did not assist with any service organizations located in the Toledo MSA AA over the evaluation period. However, the Toledo-MSA is a new AA for the bank, with the full-service branch opening in April 2018. Management is working to develop relationships with various community organizations in the AA.

Conclusions for Area Receiving a Limited Scope Review

AA4: Springfield MSA AA

Based on a limited-scope review, the bank's performance under the CD Test in the Springfield MSA AA is consistent with the bank's overall performance under the CD Test in the full-scope areas.

CNB did not originate any CD loans in the Springfield MSA AA during the CD evaluation period.

During the evaluation period, CNB made four qualifying investments totaling approximately \$1,100 to CD organizations. We considered CNB's relatively small presence in this AA in our conclusion. Qualified investments consist of donations and sponsorships to various non-profit organizations. Organizations include mental health services, food banks, and affordable housing organizations.

CNB employees serve as either a director or committee member of two different qualifying CD organizations. One bank officer is on the board of a local small business development organization and serves on the funding committee for a local mental health assistance foundation.

Performance in the Broader Statewide or Regional Area

CNB is adequately responsive to the CD needs in its AAs, so additional consideration was given to one loan in the broader regional area. The bank funded one loan that was originated outside the AAs, totaling \$55,500. This loan was originated in nearby Logan County, Ohio, and helped fund the purchase of a safe house for domestic violence victims.

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 MSA(s) and non-MSA(s) 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:	01/01/2017 – 12/31/2019	
Bank Products Reviewed:	Home mortgage, small business, and small farm loans CD loans, qualified investments, and CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State – Ohio		
Lima MSA AA	Full-Scope	Allen County, Ohio, in the Lima, OH MSA 30620.
Non-MSA AA	Full-Scope	Defiance, Hancock, Mercer, Paulding, Putnam, and Van Wert counties in Ohio and CTs 401 and 402 in Auglaize County, Ohio.
Toledo MSA AA	Full-Scope	Lucas County, Ohio, in the Toledo, OH MSA 45780
Springfield MSA AA	Limited-Scope	Clark County, Ohio, in the Springfield, OH MSA 44220.
Ohio	Limited-Scope	Broader Statewide/Regional Area in Ohio – one CD loan

Appendix B: Summary State Ratings

RATINGS: The Citizens National Bank of Bluffton			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State
The Citizens National Bank of Bluffton	Satisfactory	Satisfactory	Satisfactory
State:			
Ohio	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) 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																			2017-19		
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		
Lima MSA AA	607	79,194	49.1	2,604	2.7	0.3	1.9	12.8	7.1	8.6	52.7	48.4	51.9	31.9	44.2	37.6	0.0	0.0	0.0		
Non-MSA AA	614	79,553	49.7	5,764	0.0	0.0	0.0	3.8	3.1	5.0	49.7	61.1	50.3	46.4	35.8	44.6	0.0	0.0	0.0		
Springfield MSA AA	15	1,780	1.2	3,596	3.1	0.0	1.1	20.2	40.0	20.2	46.6	26.7	47.0	30.1	33.3	31.7	0.0	0.0	0.0		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0.*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-19		
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		
Toledo MSA AA	48	8,946	100.0	10,470	9.5	2.1	3.1	16.4	29.2	11.1	39.5	56.3	42.0	34.6	12.5	43.8	0.0	0.0	0.0		

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0.*

Note: CNB added Lucas County, Ohio, in the Toledo MSA to the AA as of April 2018 with the opening of a full-service branch in Toledo, Ohio. Therefore, the analysis for the Toledo MSA AA is for 2018 – 2019 only.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-19		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Lima MSA AA	607	79,194	49.1	2,604	21.7	4.8	9.8	17.0	18.1	22.5	21.6	26.5	25.0	39.7	45.0	32.1	0.0	5.6	10.5		
Non-MSA AA	614	79,553	49.7	5,764	14.2	3.4	6.6	16.4	19.5	22.5	22.4	24.9	24.5	47.0	46.1	36.3	0.0	6.0	10.1		
Springfield MSA AA	15	1,780	1.2	3,596	20.9	0.0	11.4	17.4	0.0	24.5	20.9	0.0	23.3	40.8	46.7	26.5	0.0	53.3	14.3		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 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																			2018-19		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Toledo MSA AA	48	8,946	100.0	10,470	26.1	0.0	10.3	17.1	4.2	21.7	18.7	2.1	22.4	38.1	12.5	33.3	0.0	81.3	12.4		

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0.*

Note: CNB added Lucas County, Ohio, in the Toledo MSA to the AA as of April 2018 with the opening of a full-service branch in Toledo, Ohio. Therefore, the analysis for the Toledo MSA AA is for 2018 – 2019 only.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-19

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Lima MSA AA	207	50,192	26.1	1,163	4.8	4.3	4.3	19.2	17.9	18.0	44.3	44.9	45.3	31.7	32.9	32.4	0.0	0.0	0.0
Non-MSA AA	563	113,054	71.0	2,836	0.0	0.0	0.0	7.4	2.5	6.5	48.6	64.5	51.0	44.1	33.0	42.6	0.0	0.0	0.0
Springfield MSA AA	23	3,919	2.9	1,553	5.0	0.0	4.4	27.2	73.9	27.5	38.0	8.7	36.1	29.9	17.4	32.1	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA 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 2018-19

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Toledo MSA AA	20	4,700	100.0	5,416	16.1	5.0	13.5	12.2	10.0	11.9	34.8	45.0	31.5	36.9	40.0	43.1	0.0	0.0	0.0

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

Due to rounding, totals may not equal 100.0.

Note: CNB added Lucas County, Ohio, in the Toledo MSA to the AA as of April 2018 with the opening of a full-service branch in Toledo, Ohio. Therefore, the analysis for the Toledo MSA AA is for 2018 – 2019 only.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-19	
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	
Lima MSA AA	207	50,192	26.1	1,163	76.8	46.9	34.7	7.0	53.1	16.3	0.0	
Non-MSA AA	563	113,054	71.0	2,836	78.0	63.4	44.1	7.1	36.6	14.9	0.0	
Springfield MSA AA	23	3,919	2.9	1,553	79.1	65.2	47.3	6.3	34.8	14.6	0.0	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 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											2018-19	
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	
Toledo MSA AA	20	4,700	100.0	5,416	80.6	80.0	45.8	7.3	20.0	12.1	0.0	

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

Note: CNB added Lucas County, Ohio, in the Toledo MSA to the AA as of April 2018 with the opening of a full-service branch in Toledo, Ohio. Therefore, the analysis for the Toledo MSA AA is for 2018 – 2019 only.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-19

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Lima MSA AA	245	30,357	32.7	128	0.6	0.0	0.0	5.2	0.4	0.8	75.8	88.6	87.5	18.4	11.0	11.7	0.0	0.0	0.0
Non-MSA AA	497	59,387	66.4	604	0.0	0.0	0.0	1.0	0.0	0.2	41.4	54.7	56.3	57.6	45.3	43.5	0.0	0.0	0.0
Springfield MSA AA	7	488	0.9	100	3.5	0.0	0.0	17.2	0.0	3.0	44.1	100.0	68.0	35.2	0.0	29.0	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018-19

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Toledo MSA AA	0	0	0.0	50	6.9	0.0	2.0	11.9	0.0	10.0	35.0	0.0	12.0	46.3	0.0	76.0	0.0	0.0	0.0

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

Note: CNB added Lucas County, Ohio, in the Toledo MSA to the AA as of April 2018 with the opening of a full-service branch in Toledo, Ohio. Therefore, the analysis for the Toledo MSA AA is for 2018 – 2019 only.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-19	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Lima MSA AA	245	30,357	32.7	128	97.9	81.6	62.5	1.5	18.4	0.6	0.0	
Non-MSA AA	497	59,387	66.4	604	97.9	77.5	62.4	1.1	22.5	1.0	0.0	
Springfield MSA AA	7	488	0.9	100	97.3	100.0	57.0	1.9	100.0	0.8	0.0	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0.*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018-19	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Toledo MSA AA	0	0	0.0	50	93.5	0.0	72.0	4.8	0.0	1.7	0.0	

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

Note: CNB added Lucas County, Ohio, in the Toledo MSA to the AA as of April 2018 with the opening of a full-service branch in Toledo, Ohio. Therefore, the analysis for the Toledo MSA AA is for 2018 – 2019 only.