



## **PUBLIC DISCLOSURE**

July 5, 2022

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The Citizens National Bank of Cheboygan  
Charter Number: 13522

303 N. Main Street  
Cheboygan, MI 49721

Office of the Comptroller of the Currency

200 Public Square, Suite 1610  
Cleveland, OH 44114-2241

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

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**

**The lending test is rated: Satisfactory**

The major factors that support this rating include:

- The Lending Test rating is based on the reasonable distribution of home mortgage loans among borrowers of different incomes and small business loans among businesses of different sizes, and an excellent geographic distribution of home mortgages and small loans to businesses.
- A substantial majority of the bank's loans are inside its assessment area (AA).
- The bank's loan-to-deposit (LTD) ratio is reasonable.

### Loan-to-Deposit Ratio

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

We evaluated Citizens National Bank of Cheboygan's (CNB or bank) quarterly LTD ratio for the period January 1, 2019, to December 31, 2021. The bank's average LTD ratio during this period was 49.5 percent, with quarterly ratios ranging from 35.8 percent in the third quarter of 2021, to 59.2 percent in the second quarter of 2019. We also compared CNB's LTD ratio to three similarly situated banks located in Emmet, Charlevoix, and Presque Isle Counties, with total assets ranging from \$76.0 million to \$467.6 million. The average LTD ratio for similarly situated banks ranged from 56.0 percent to 88.1 percent.

### Lending in Assessment Area

A substantial majority of the bank's loans were made inside its AA. The bank originated 95.7 percent by number and 95.4 percent by dollar amount of its total loans inside the AA during the evaluation period. This analysis is performed at the bank level rather than the AA level and resulted in a positive impact on the bank's overall geographic distribution of lending by income.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	90	95.74	4	4.26%	94	\$21,664	98.5	\$329	1.5	\$21,993
Small Business	89	95.70	4	4.30	93	\$30,828	93.13	\$2,274	6.87	\$33,103
<b>Total</b>	<b>179</b>	<b>95.72</b>	<b>8</b>	<b>4.28</b>	<b>187</b>	<b>\$54,492</b>	<b>95.44</b>	<b>\$2,603</b>	<b>4.56</b>	<b>\$57,095</b>

*Source: Bank Data  
Due to rounding, totals may not equal 100.0%*

## **Description of Institution**

CNB is a full-service, intrastate community bank headquartered in Cheboygan, Michigan, and is a wholly owned subsidiary of CNB Corporation, a one-bank holding company. CNB's operations are focused within the counties of Cheboygan, Emmet, Charlevoix, and Presque Isle in Michigan's northern Lower Peninsula. As of December 31, 2021, the bank's assets totaled \$492.1 million, and tier one capital totaled \$29.5 million, or 6.0 percent of total assets.

CNB has eight full-services branches. Four branches and one drive-through only facility are located in Cheboygan County. There are three additional branches in Emmet County, and one branch in Presque Isle County. Presque Isle County also has an e-branch. The e-branch is located in Pellston and is a self-service branch with access available 24 hours a day, seven days a week, with magnetic key card entry. The e-branch provides access to online banking services, as well as a residential mortgage lender to assist with loan applications and transactions during regular business hours.

CNB's primary loan products are residential real estate loans and loans to small businesses. During the evaluation period, the bank's loan portfolio increased by 11.4 percent to \$170.2 million. As of December 31, 2021, the loan portfolio was comprised of residential real estate loans (\$61.7 million or 36.2 percent), commercial real estate loans (\$59.0 million or 36.4 percent), commercial and industrial loans (\$17.4 million or 10.3 percent), consumer loans (\$6.2 million or 3.7 percent), construction loans (\$21.1 million or 12.5 percent) and farm loans (\$98,000 or less than 1 percent).

The bank offers traditional home loan products, including home mortgage, home construction, consumer, and home equity loans. The bank also offers home equity lines of credit (HELOCs) and commercial loans. CNB's consumer deposit-related products and services include checking, savings, and money market accounts, certificates of deposit, online bill payment, mobile banking, overdraft protection, and ATM services. Business-related deposit products and services include checking and savings accounts, online banking and bill pay, remote deposit capture, and ACH.

There are no legal, financial, or other factors impeding CNB's ability to help meet the credit needs of the AA. The bank received a "Satisfactory" rating on their previous CRA performance evaluation dated June 3, 2019.

## **Scope of the Evaluation**

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

This performance evaluation assesses CNB's record of meeting the credit needs of its AA. We performed a full-scope review using Small Bank CRA procedures, which includes the lending test. We performed the lending test analysis using a sample of home mortgage loans and small loans to businesses. The evaluation period for the lending test covers January 1, 2019, to December 31, 2021. Based on the bank's internal reports and discussions with management, we determined that the bank's primary lending products during the evaluation period were home mortgages and small loans to businesses. We used supporting information to complete our review including internal bank reports, deposit market share data, and community contact information.

## **Selection of Areas for Full-Scope Review**

CNB has one AA, the Cheboygan non-MSA AA, that encompasses all of Cheboygan and Emmet counties, and portions of Presque Isle and Charlevoix counties. We performed a full-scope review of the AA. Please refer to *Appendix A, Scope of Examination*, for more information.

## **Ratings**

The bank's overall rating is based on its state of Michigan lending performance within the Cheboygan non-MSA AA.

## **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

## State Rating

### State of Michigan

**CRA rating for the State of Michigan:** Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The bank's geographic distribution of home mortgage loans and small loans to businesses reflects an excellent dispersion throughout the AA.
- The bank distribution of home mortgage loans among individuals of different income levels and small loans to businesses of different sizes is reasonable.

### Description of Institution's Operations in Michigan

As of December 31, 2021, CNB had one AA within the state of Michigan, the Cheboygan non-MSA AA. The AA is contiguous, includes all of Cheboygan and Emmet counties, and portions of Charlevoix and Presque counties, and does not arbitrarily exclude any low- or moderate-income census tracts (CT). During the evaluation period, CNB operated eight branches within the AA. Two branches are in the city of Cheboygan, and one branch is located in each of the following cities: Alanson, Indian River, Mackinaw City, Onaway, Pellston, and Petosky. In addition, CNB has a stand-alone drive-through facility in Cheboygan and a loan production office in Petosky. All branches have similar hours, with the Cheboygan South Branch having limited hours on Saturday. In addition, each branch offers drive-through services and deposit taking ATMs. Based on the 2015 ACS Census Data, the bank's main office, Cheboygan branch, and Onaway branch are in moderate-income CTs. The branches in Indian River, Mackinaw City, Alanson, and Pellston are in middle-income CTs. The branch in Petoskey is in an upper-income CT. The bank did not open or close any branch offices during the evaluation period.

The AA primarily consists of rural counties and relies on a significant seasonal population and tourism economy. During the evaluation period, there were no low-income CTs and three moderate-income CTs in the AA. Based on the 2015 ACS Census data, two of the moderate-income census tracts are in Cheboygan County and one is in Presque Isle County. The AA contains approximately 0.78 percent of Michigan's population, or 78,450 persons and 54,219 housing units. In aggregate, 35.7 percent of families in the AA are low- or moderate-income and ten percent of families live below the poverty level. According to the 2015 US Census Data, the AA's population is comprised of 18.0 percent low-income families, 17.7 percent moderate-income families, 22.4 percent middle-income families, and 41.9 percent upper-income families. The majority of owner-occupied housing units in the AA are in middle-income CTs.

The AA is moderately competitive overall based on an assessment of community and large banks serving the area. According to the June 30, 2021, Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, CNB ranked second in terms of deposit market share in the AA, with 18.6 percent of total deposits. The top five institutions (including CNB) have a market share of 77.9 percent, and include Huntington National Bank, JP Morgan Chase Bank, First Community Bank, and Charlevoix State Bank. Significant competition for loans exists in the AA. Based on the 2020 aggregate business loan data and the 2021 aggregate mortgage loan data, there are 656 lenders within the AA. The top five business lenders are large banks with a total market share of 41.1 percent. The top five mortgage lenders account for 15

percent of loans in the AA and include Rocket Mortgage, Wells Fargo Bank, United Wholesale Mortgage, JP Morgan Chase, and Loan Depot.

Economic conditions in the AA are generally consistent with the state of Michigan for Emmet and Charlevoix counties. During the evaluation period, the unemployment rate in the state of Michigan was 4.1 percent, 10.0 percent, and 5.9 percent for 2019, 2020, and 2021, respectively. The unemployment rate in Emmet County was 5.5 percent, 10.8 percent, and 6.4 percent, respectively, for the same periods. The unemployment rate in Charlevoix County was 4.7 percent, 10.2 percent, and 6.0 percent during the same time frame. Economic conditions in Cheboygan and Presque Isle Counties were below the conditions in the state of Michigan. The unemployment rate for Cheboygan County was 8.8 percent, 15.0 percent, and 8.3 percent for 2019, 2020, and 2021. The unemployment rate in Presque Isle County was 7.7 percent, 11.6 percent, and 7.9 percent for the same time periods. Economic conditions are generally improving the area and recovery is ongoing, with much of the growth driven by retirees. However, the AA was negatively impacted by the COVID-19 pandemic, with unemployment in the AA surpassing the unemployment rate for the state of Michigan. The unemployment rate during the height of the pandemic in 2020 ranged from 28.3 percent to 38.3 percent in the AA compared to 22.7 percent for the state of Michigan.

We considered information obtained from two community organizations within the AA to gain an understanding of the community development needs and credit opportunities of the AA. The organizations primarily focus on economic and community development. Both contacts identified affordable housing as a primary concern in the region. The population within the AA generally consists of retirees who are more affluent, and there is a growing number of individuals looking to retire in the region. The proximity of the AA to the Great Lakes has caused housing inventory to shift towards demand for second homes and short-term rentals, which has increased housing prices and caused demand to outweigh supply.

## Cheboygan Non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cheboygan Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	11.5	61.5	26.9	0.0
Population by Geography	78,450	0.0	12.1	54.8	33.1	0.0
Housing Units by Geography	54,219	0.0	9.3	58.2	32.5	0.0
Owner-Occupied Units by Geography	26,633	0.0	11.0	57.6	31.4	0.0
Occupied Rental Units by Geography	7,103	0.0	15.1	46.0	38.9	0.0
Vacant Units by Geography	20,483	0.0	5.0	63.2	31.8	0.0
Businesses by Geography	7,574	0.0	11.8	43.4	44.8	0.0
Farms by Geography	314	0.0	9.2	52.9	37.9	0.0
Family Distribution by Income Level	22,351	18.0	17.7	22.4	41.9	0.0
Household Distribution by Income Level	33,736	21.2	17.7	18.0	43.1	0.0
Median Family Income Non-MSAs - MI		\$53,628	Median Housing Value			\$146,730
			Median Gross Rent			\$699
			Families Below Poverty Level			10.0%

Source: 2015 ACS and 2021 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.

## Scope of Evaluation in Michigan

This analysis reflects a full-scope review of the Cheboygan non-MSA AA. To develop our conclusions, we considered factors within the Cheboygan non-MSA community profile that would impact the bank's ability to lend within AA, such as demographic and market share information. We also considered the number of home mortgage loans and loans to small businesses originated or purchased by CNB during the review period. Refer to *Appendix A - Scope of Examination*, for more information on this AA.

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Cheboygan non-MSA AA is good.

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

The bank exhibits an excellent geographic distribution of loans in the state. In concluding on the bank's geographic distribution of home mortgage loans and small loans to businesses, we considered that there were no low-income CTs and only three moderate-income CTs in the AA.

#### *Home Mortgage Loans*

Refer to Table O in the state of Michigan section of Appendix D for the facts and data used to evaluate the bank's geographic distribution of home mortgage loans.

The bank's distribution of home mortgage loans among geographies of different income levels in the AA is excellent. The bank's percentage of home mortgage loans among moderate-income CTs in the AA was 26.7 percent. This is significantly above the 11.0 percent of the AA's owner-occupied housing units in moderate-income geographies and the 5.2 percent of aggregate bank lending.

#### *Small Loans to Businesses*

Refer to Table Q in the state of Michigan section of Appendix D for the facts and data used to evaluate the bank's geographic distribution of small loans to businesses.

The bank's distribution of small loans to businesses among geographies of different income levels in the AA is excellent. The bank's percentage of small loans to businesses among moderate-income CTs was 12.9 percent. This exceeds both the 11.8 percent of businesses in the moderate-income CTs and 8.0 percent aggregate bank lending. Given the limited number of moderate-income CTs in the AA, the bank's distribution of loans to small businesses relative to aggregate bank lending was emphasized.

### Distribution of Loans by Income Level of the Borrower

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



### ***Home Mortgage Loans***

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

The bank's distribution of home mortgage loans to borrowers of different income levels in the AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 4.4 percent. This is well-below the 18.0 percent of low-income families in the AA but exceeds with the 3.9 percent aggregate bank lending. The bank's percentage of home mortgage loans to moderate-income borrowers of 20.0 percent exceeds both the 17.7 percent of moderate-income families in the AA and the 11.8 percent of aggregate bank lending.

### ***Small Loans to Businesses***

Refer to Table R in the state of Michigan 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 bank's distribution of small loans to business with revenues of less than \$1 million is reasonable. The bank's percentage of small loans to businesses with revenues of less than \$1 million is 68.8 percent, which is below the percentage of businesses with revenues of less than \$1 million of 84.6 percent but exceeds the 40.3 percent of aggregate bank lending.

### **Responses to Complaints**

There were no complaints during the evaluation period that would affect the bank's CRA rating.

# Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Home Mortgage, Small Business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Michigan</b>		
Cheboygan non-MSA	Full-Scope	Cheboygan County, Emmet County, Portions of Presque Isle County and Charlevoix County



## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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



throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2019-21**

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
CNB Non-MSA AA	90	21,664	100.0	3,242	0.0	0.0	0.0	11.0	26.7	5.2	57.6	58.9	52.1	31.4	14.4	42.6	0.0	0.0	0.0
<b>Total</b>	<b>90</b>	<b>21664</b>	<b>100.0</b>	<b>3,242</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.0</b>	<b>26.7</b>	<b>5.2</b>	<b>57.6</b>	<b>58.9</b>	<b>52.1</b>	<b>31.4</b>	<b>14.4</b>	<b>42.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2019-21**

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
CNB Non-MSA AA	90	21,664	100	3,242	18.0	4.4	3.9	17.7	20.0	11.8	22.4	22.2	17.2	41.9	53.3	57.0	0.0	0.0	10.1
<b>Total</b>	<b>90</b>	<b>21,664</b>	<b>100</b>	<b>3,242</b>	<b>18.0</b>	<b>4.4</b>	<b>3.9</b>	<b>17.7</b>	<b>20.0</b>	<b>11.8</b>	<b>22.4</b>	<b>22.2</b>	<b>17.2</b>	<b>41.9</b>	<b>53.3</b>	<b>57.0</b>	<b>0.0</b>	<b>0.0</b>	<b>10.1</b>

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 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** **2019-21**

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
CNB Non-MSA AA	93	30,828	100	1,495	0.0	0.0	0.0	11.8	12.9	8.0	43.4	48.4	42.7	44.8	38.7	49.3	0.0	--	0.0
<b>Total</b>	<b>93</b>	<b>30,828</b>	<b>100</b>	<b>1,495</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.8</b>	<b>12.9</b>	<b>8.0</b>	<b>43.4</b>	<b>48.4</b>	<b>42.7</b>	<b>44.8</b>	<b>38.7</b>	<b>49.3</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2019-21**

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
CNB Non-MSA AA	93	30,828	100	1,495	84.6	68.8	40.3	4.6	31.2	10.8	0.0
<b>Total</b>	<b>93</b>	<b>30,828</b>	<b>100</b>	<b>1,495</b>	<b>84.6</b>	<b>68.8</b>	<b>40.3</b>	<b>4.6</b>	<b>31.2</b>	<b>10.8</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%