



## **PUBLIC DISCLOSURE**

May 8, 2023

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The First National Bank of Pandora  
Charter Number: 11343

102 E. Main Street  
Pandora, OH 45877

Office of the Comptroller of the Currency

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

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

## Table of Contents

Overall CRA Rating .....	1
Description of Institution .....	2
Scope of the Evaluation .....	3
Discriminatory or Other Illegal Credit Practices Review .....	4
State Rating .....	5
State of Ohio .....	5
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 **Outstanding**.

**The Lending Test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on the state rating and the following overall conclusions:
  - The bank exhibits excellent geographic distribution of loans in the assessment areas (AAs).
  - The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes.
  - The bank originated a significant volume of community development (CD) loans that were responsive to the credit needs of small businesses during the COVID-19 pandemic.

## Loan-to-Deposit Ratio

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

The First National Bank of Pandora's (FNB or bank) quarterly average LTD ratio over the 13 quarters since the previous Community Reinvestment Act (CRA) evaluation (December 31, 2018, to December 31, 2021) is 73 percent. The ratio ranged from a high of 78.9 percent as of September 30, 2019, to a low of 66 percent as of December 31, 2021. FNB's LTD ratio is commensurate with similarly situated financial institutions headquartered in the bank's AAs with total assets less than \$250 million. These similarly situated banks have an average LTD of 77.1 percent, ranging from a high of 85 percent to a low of 69 percent.

FNB's LTD ratios have been trending down during the COVID-19 pandemic (2020 and 2021) due to deposit growth largely outpacing loan growth. Between March 31, 2020, and December 31, 2021, net loans and leases grew by 12 percent from \$127.7 million to \$142.8 million. By contrast, total deposits during this period grew by 26 percent from \$171.8 million to \$216.4 million. This latter trend reasonably coincides with a surge in deposits many financial institutions experienced during and following the height of the COVID-19 pandemic, stemming from various government stimulus plans. Additionally, FNB sells home mortgage loans on the secondary market as discussed below.

## Lending in Assessment Area

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

The bank originated and purchased 60.2 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.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage	522	59.8	351	40.2	873	82,304	56.2	64,129	43.8	146,433
Small Business	40	66.7	20	33.3	60	3,612	64.5	1,988	35.5	5,600
<b>Total</b>	562	60.2	371	39.8	933	85,916	56.5	66,117	43.5	152,033

*Source: 2019 – 2021 Home Mortgage Disclosure Act (HMDA) data and internal bank data for small business loans.  
Due to rounding, totals may not equal 100.0%.*

## Description of Institution

FNB is a wholly owned subsidiary of a one-bank holding company, Pandora Bancshares, Inc. Both the bank and holding company are headquartered in Pandora, Ohio (Putnam County), approximately 110 miles northwest of Columbus, Ohio. As of December 31, 2021, FNB had total assets of \$239.8 million with \$142.8 million in net loans and leases, \$216.4 million in total deposits, and \$19.6 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.

During the evaluation period, FNB had five full-service branches in Ohio including the main office in Pandora (Putnam County). Besides its main office in Pandora, there is one branch in Ottawa (Putnam County), one branch in Bluffton (Allen County), and two branches in Findlay (Hancock County). Each branch has an automated teller machine (ATM) and drive-thru facility. All are in middle- and upper-income census tracts (CTs). FNB did not open or close any branches during the evaluation period; however, FNB opened the Lima West branch in January of 2023 in a moderate-income CT.

FNB is a single-state financial institution with one rating area (Ohio) and two AAs. One AA is comprised of one middle-income CT and one upper-income CT in Allen County in the Lima, OH Metropolitan Statistical Area (MSA) 30620 (Lima MSA AA). The other AA is comprised of two moderate-income, six middle-income, and twelve upper-income CTs in Putnam and Hancock Counties (Non-MSA AA). The AAs are contiguous, meet the requirements of the CRA regulation, and do not reflect illegal discrimination or arbitrarily exclude any low- and moderate-income (LMI) areas. The AA is further described in the “Scope of Evaluation” and “Description of Institution’s Operations in Ohio” sections of this performance evaluation.

As of the December 31, 2021, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Report, FNB’s total loans were \$144.9 million, representing 60.4 percent of total assets. The bank offers a variety of traditional lending and deposit products at all its branches to serve the community. Loan products include business, home mortgage, agricultural, and consumer loans. Deposit products include checking, savings, and certificates of deposit (CDs). The bank also offers online and mobile banking.

FNB's primary lending focus is residential real estate (home mortgage) and commercial and commercial real estate (business) lending. As of the December 31, 2021, Call Report, the bank's loan portfolio is comprised of 43.5 percent home mortgage loans, 41.2 percent business loans, 10.9 percent agriculture loans, and 4.4 percent consumer loans. The bank's loan originations, based on the number of loans originated during the evaluation period, are 47.1 percent home mortgage, 24 percent business, 4.6 percent agriculture, and 24.3 percent consumer loans. The bank's loan originations, based on the dollar amount of loans originated during the evaluation period, are 54.9 percent home mortgage, 36.3 percent business, 4.7 percent agriculture, and 4.1 percent consumer loans. During the evaluation period, FNB sold 470 bank-originated home mortgage loans totaling \$79.3 million on the secondary market to the Fannie Mae.

The COVID-19 pandemic in 2020 impacted the local economy, including unemployment data. The Small Business Administration's (SBA) Paycheck Protection Program (PPP) provided loans to help businesses keep their workforces employed during the pandemic. The bank was particularly responsive to the SBA's PPP and originated a significant volume of PPP loans in 2020 and 2021. In 2020, the bank originated 64 SBA PPP loans totaling \$4.5 million. In 2021, the bank originated 269 SBA PPP loans totaling \$9.8 million. Of the 269 loans originated in 2021, 265 were made in Ohio. Refer to the Lending Test (Community Development Lending) for additional information on the qualified CD PPP loans made in 2021.

There are no financial, legal, or other factors that impede the bank's ability to help meet the credit needs of its AAs. FNB's previous CRA rating was Satisfactory as of the CRA Performance Evaluation (PE) dated January 30, 2019.

## **Scope of the Evaluation**

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

The Office of the Comptroller of the Currency (OCC) conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The OCC used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The evaluation period was from January 1, 2019, to December 31, 2021.

The OCC evaluated the bank's lending performance based on its primary lending products, home mortgage and small business lending. While the bank offers other lending products, these products were not primary products during the evaluation period. As a result, the OCC did not consider these as part of the performance evaluation, as an analysis of this data would not be meaningful. FNB's primary lending products are discussed under the "Description of Institution" section in this report. For the Lending Test, the OCC evaluated all home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) for 2019, 2020, and 2021. For the small loans to businesses, the OCC transaction tested 20 loans per year for Lending in the AA. For the geographic and borrower income distribution analyses, the OCC transaction tested 20 loans per year per AA, if available. For the small loans to businesses, the OCC transaction tested 20 loans per year in the Non-MSA AA. For the Lima MSA AA, the OCC transaction tested a total of 42 loans inside the AA, which included all the small business loans originated in the Lima MSA AA during the evaluation period. The OCC relied on internal bank reports for the transaction testing of small loans to businesses during the evaluation period.

For analysis purposes, the OCC compared the bank’s lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census data and 2021 Dun and Bradstreet (D&B) data. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

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

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

FNB has two AAs, the Non-MSA AA and Lima MSA AA, as described above under the “Description of Institution” section. The OCC completed a full-scope review of both AAs. A description of each AA is also provided in the “Description of Institution’s Operations in Ohio” section of this evaluation.

### **Ratings**

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings. FNB operates in a single state. All the bank’s offices are in Ohio, so its overall rating is based on performance solely in Ohio. The State of Ohio rating is based on performance in both AAs.

Refer to the “Scope” section under the state rating for details regarding how the areas were weighted in arriving at the respective ratings.

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

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

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

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

## State Rating

### State of Ohio

**CRA rating for the State of Ohio<sup>1</sup>:** Outstanding.

**The Lending Test is rated:** Outstanding.

The major factors that support this rating include:

- FNB exhibits an excellent geographic distribution of loans in its AAs.
- FNB exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank has not received any complaints about its performance in helping to meet the AAs’ credit needs during the evaluation period.
- FNB was particularly responsive to the SBA’s PPP and originated a significant volume of SBA PPP loans during the COVID-19 pandemic.

### Description of Institution’s Operations in Ohio

FNB has designated two AAs in Ohio, the Non-MSA AA and the Lima MSA AA. The bank selected the AAs based on their targeted lending area and office locations. The AAs are contiguous, meet the requirements of the regulation, and do not reflect illegal discrimination, nor do they arbitrarily exclude LMI areas.

The following information regarding demographic data, job market, affordable housing cost, competition, and credit needs provides additional performance context for FNB’s operations in Ohio.

#### Non-MSA AA

During the evaluation period, the Non-MSA AA includes Hancock and Putnam Counties in Ohio. The bank has two branches (Findlay East and Findlay West) in Hancock County and two branches (main office in Pandora and the Ottawa office) in Putnam County. All offices are in middle- and upper-income CTs. Each office has an ATM and drive-thru. The table below provides a summary of demographic data for the AA.

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA (Hancock and Putnam Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	0.0	10.0	30.0	60.0	0.0

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

Population by Geography	109,612	0.0	10.8	29.9	59.4	0.0
Housing Units by Geography	47,038	0.0	10.4	30.9	58.7	0.0
Owner-Occupied Units by Geography	32,717	0.0	6.3	30.9	62.8	0.0
Occupied Rental Units by Geography	11,415	0.0	21.9	29.8	48.3	0.0
Vacant Units by Geography	2,906	0.0	10.9	36.3	52.8	0.0
Businesses by Geography	6,674	0.0	12.2	31.9	55.9	0.0
Farms by Geography	718	0.0	2.8	30.1	67.1	0.0
Family Distribution by Income Level	29,656	13.0	14.9	21.6	50.5	0.0
Household Distribution by Income Level	44,132	17.9	15.5	16.9	49.6	0.0
Median Family Income Non-MSAs - OH	\$55,785	Median Housing Value				\$131,025
		Median Gross Rent				\$674
		Families Below Poverty Level				7.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0%.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

As of the 2015 ACS U.S. Census data in the table above, the population of the Non-MSA AA is 109,612, with 10.8 percent of the population living in moderate-income CTs, 29.9 percent in middle-income CTs, and 59.4 percent in upper-income CTs. As of the 2015 ACS U.S. Census, the AA consists of 20 CTs, and is comprised of two moderate-income, six middle-income, and 12 upper-income CTs. The AA includes 29,656 families and 44,132 households. There were no CTs designated as distressed or underserved in 2019 and 2020. In 2021, the bank had one middle-income CT (13) in Hancock County that was designated as an underserved CT (banking desert).

According to the 2015 ACS U.S. Census data, the median housing value is \$131,025. With the median family income of \$55,785, moderate-income families make less than \$44,628 annually and low-income families make less than \$27,893 annually. Median housing values are 2.9 times the annual income of moderate-income families and 4.7 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among these families. The 2015 ACS U.S. Census data shows that there are 47,038 total housing units in the Non-MSA AA, of which 69.5 percent are owner-occupied, 24.3 percent are rental occupied, and 6.2 percent are vacant units. The median age of housing stock is approximately 53 years overall and 66 years in the moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing in moderate-income geographies is also a significant barrier to mortgage lending in those CTs. Additionally, 7.7 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

The economic conditions in the Non-MSA AA have improved since the start of the COVID-19 pandemic and are overall stable. The unemployment rates in Hancock and Putnam Counties and the state and national unemployment rates experienced a spike in unemployment during April and May of 2020 followed by a gradual recovery through the end of 2021. By the fourth quarter of 2021, the unemployment rates reached their lowest point since the beginning of COVID-19. According to the U.S. Bureau of Labor Statistics as of December 2021, the “not seasonally adjusted” unemployment rates were 2.7 percent in Hancock County and 2.6 percent in Putnam County, which are reasonable when compared



with the State of Ohio unemployment rate of 3.5 percent and the national unemployment rate of 3.7 percent for the same period.

<b>Average Annual Unemployment Rates</b>				
	Average 2019	Average 2020	Average 2021	December 2021
Hancock County	3.2	6.9	4.2	2.7
Putnam County	3.1	5.6	3.4	2.6
State of Ohio	4.2	8.2	5.1	3.5
United States	3.7	8.1	5.4	3.7
<i>Source: U.S. Bureau of Labor Statistics (not seasonally adjusted).</i>				

According to business demographic data from D&B (2021), the primary industries in the AA are services and retail trade. Primary employers in the AA include Blanchard Valley Health System, Whirlpool Corporation, and Marathon Petroleum Corporation in Hancock County and Kalida Manufacturing Inc., Global Precision Parts Inc., and Progressive Stamping in Putnam County.

Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks, credit unions, and branches of larger financial institutions. According to the June 30, 2021, Deposit Market Share Reports from the Federal Deposit Insurance Corporation (FDIC), 13 financial institutions with 42 offices operated in Hancock and Putnam counties. FNB holds the 7<sup>th</sup> largest deposit market share at 5.5 percent as of June 30, 2021, with \$150.3 million in total deposits. The bank's primary competitors include financial institutions with significant deposit activity in the AA such as Premier Bank, Fifth Third Bank, National Association (N.A.), Huntington National Bank, Union Bank Company, and JPMorgan Chase Bank, N.A., with these five holding a 76.7 percent deposit market share.

Strong competition for home mortgage loans also exists. As stated above, FNB's primary business focus includes home mortgage lending. FNB ranks 9<sup>th</sup> out of 196 lenders in the AA in residential home mortgage volume based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data. FNB had 2.9 percent of the lending market share, based on the number of loans, as of the 2021 Peer Mortgage Data Report, lending \$20.9 million (135 loans). Top mortgage lenders in the AA include Loandepot.com, LLC, Premier Bank, Huntington National Bank, Superior Credit Union, Inc., and Fifth Third Bank, N.A., with a combined market share of 52.3 percent.

There is strong competition for small business lending as well. According to the D&B data as of June 2021, 78 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 67 percent of the businesses have fewer than five employees. According to the 2021 Peer Small Business Data, 58 lenders originated or purchased a total of 1,897 small business loans in the AA. The top five lenders include Premier Bank, JPMorgan Chase Bank, N.A., U.S. Bank, N.A., American Express Bank National Bank, and Huntington National Bank, with a combined market share of 62.3 percent based on the number of loans. FNB is not included in the peer small business data report as the bank is not required to report CRA small business data.

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

Lima MSA AA

As of the evaluation period, the Lima MSA AA included two CTs in Allen County, Ohio (CTs 101 and 102). The bank had one branch in Bluffton, Ohio in an upper-income CT. The office has an ATM and drive-thru. The table below provides a summary of demographic data for the area.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Lima MSA AA (CTs 101 and 102 only in Allen County, OH)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	2	0.0	0.0	50.0	50.0	0.0
Population by Geography	8,538	0.0	0.0	48.1	51.9	0.0
Housing Units by Geography	3,312	0.0	0.0	47.5	52.5	0.0
Owner-Occupied Units by Geography	2,504	0.0	0.0	52.0	48.0	0.0
Occupied Rental Units by Geography	620	0.0	0.0	31.5	68.5	0.0
Vacant Units by Geography	188	0.0	0.0	40.4	59.6	0.0
Businesses by Geography	480	0.0	0.0	37.3	62.7	0.0
Farms by Geography	51	0.0	0.0	92.2	7.8	0.0
Family Distribution by Income Level	2,356	13.8	13.4	22.4	50.4	0.0
Household Distribution by Income Level	3,124	16.2	12.2	18.1	53.5	0.0
Median Family Income MSA - 30620 Lima, OH MSA		\$56,195	Median Housing Value			\$127,687
			Median Gross Rent			\$637
			Families Below Poverty Level			7.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0%. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

As of the 2015 ACS U.S. Census data in the table above, the population of the Lima MSA AA is 8,538, with 48.1 percent of the population living in middle-income CTs and 51.9 percent in upper-income CTs. As of the 2015 ACS U.S. Census, the AA consists of two CTs, and is comprised of one middle-income and one upper-income CT. The AA includes 2,356 families and 3,124 households. There were no CT classification changes and no designated distressed or underserved CTs in the AA during the evaluation period.

According to the 2015 ACS U.S. Census data, the median housing value is \$127,687. With the median family income of \$56,195, moderate-income families make less than \$44,956 annually and low-income families make less than \$28,098 annually. Median housing values are 2.8 times the annual income of moderate-income families and 4.5 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among these families. The 2015 ACS U.S. Census data shows that there are 3,312 total housing units in the Lima MSA AA, of which 75.6 percent are owner-occupied, 18.7 percent are rental occupied, and 5.7 percent are vacant units. The median age of housing stock is approximately 61 years. Additionally, 7.6 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

The economic conditions in the Lima MSA AA have improved since the start of the COVID-19 pandemic and are overall stable. The unemployment rates in Allen County and the state and national unemployment rates experienced a spike in unemployment during April and May of 2020 followed by a gradual recovery through the end of 2021. By the fourth quarter of 2021, the unemployment rates reached their lowest point. According to the U.S. Bureau of Labor Statistics as of December 2021, the “not seasonally adjusted” unemployment rate was 3.7 percent in Allen County, which is reasonable when compared with the State of Ohio and the national unemployment rates.

<b>Average Annual Unemployment Rates</b>				
	Average 2019	Average 2020	Average 2021	December 2021
Allen County	4.1	8.6	5.7	3.7
State of Ohio	4.2	8.2	5.1	3.5
United States	3.7	8.1	5.4	3.7

*Source: U.S. Bureau of Labor Statistics (not seasonally adjusted).*

According to business demographic data from D&B (2021), the primary industries in the AA are services and retail trade. Primary employers in the AA include St. Rita’s Medical Center/Mercy Health, GROB Systems Inc., and SumiRiko Ohio, Inc.

Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks, credit unions, and branches of larger financial institutions. According to the June 30, 2021, Deposit Market Share Reports from the FDIC, 11 financial institutions with 29 offices operated in Allen County. FNB holds the 9<sup>th</sup> largest deposit market share at 2.4 percent as of June 30, 2021, with \$56.7 million in total deposits. The bank’s primary competitors include financial institutions with significant deposit activity in the AA such as JPMorgan Chase Bank, N.A, Citizens National Bank of Bluffton, Premier Bank, Huntington National Bank, and Union Bank Company, with these five holding about 83 percent deposit market share.

Strong competition for home mortgage loans also exists. As stated above, FNB’s primary business focus includes home mortgage lending. FNB ranks 3<sup>rd</sup> out of 52 lenders in Allen County, Ohio, in residential home mortgage volume based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data. FNB had 13.1 percent of the lending market share, based on the number of loans, as of the 2021 Peer Mortgage Data Report, lending \$5.4 million (40 loans). The top two mortgage lenders in Allen County, Ohio, were Citizens National Bank and Superior Credit Union, Inc., with a combined market share of almost 40 percent.

There is strong competition for small business lending as well. According to the D&B data as of June 2021, 79.6 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 67.6 percent of the businesses have fewer than five employees. According to the 2021 Peer Small Business Data, 52 lenders originated or purchased a total of 1,457 small business loans in Allen County. The top five lenders include JPMorgan Chase Bank, N.A., American Express Bank National Bank, U.S. Bank, N.A., Premier Bank, and Citizens National Bank, with a combined market share of about 56.2 percent based on the number of loans. FNB is not included in the peer small business data report as the bank is not required to report CRA small business data.

As part of the CRA performance evaluation, the OCC reviewed information provided from one interview with a representative from an affordable housing organization. The contact identified affordable housing as a credit need in the community. Additionally, the contact identified first time

homeowner mortgages, grants for homeownership, financial literacy counseling, small dollar mortgages, and affordable retail products as needs in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

### **Scope of Evaluation in Ohio**

The OCC performed a full-scope review of the Non-MSA AA and the Lima MSA AA. The data in the AAs were analyzed and presented as two AAs for the purposes of this evaluation. Home mortgage and small business lending are the bank's primary lending products and were evaluated under the Lending Test. As discussed above, the OCC used HMDA data for 2019, 2020, and 2021 for the home mortgage loan analysis and transaction tested 20 small loans to businesses per year per AA, if available.

The rating is based on performance in the Non-MSA AA and the Lima MSA AA. Both primary products were weighted equally given that both home mortgage and small business loans accounted for approximately 41 to 44 percent of the loan portfolio as of December 31, 2021. Based on dollar volume, FNB originated more home mortgage loans during the evaluation period; however, over 36 percent of the originations were small loans to businesses. The Non-MSA AA was weighted slightly heavier than the Lima MSA AA given that there are only two CTs in the Lima MSA AA. During the evaluation period, there was one branch in the Lima MSA AA.

### **Lending Test**

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

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

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

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

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

As of the 2015 ACS U.S. Census, there are no low-income CTs in the bank's AAs. There are two moderate-income CTs in Hancock County (tracts 5 and 9) in the Non-MSA AA. Both CTs are near the bank's Findlay offices. FNB made loans in each of the two moderate-income CTs during the evaluation period. There were no CTs designated as distressed or underserved in 2019 and 2020. However, in 2021, the bank had one middle-income CT (13) in Hancock County that was designated as an underserved CT (banking desert).

As of the evaluation period, the bank's five branches were all in middle- and upper-income CTs. The OCC noted that as of January 2023, FNB opened the Lima West office in Allen County, Ohio, in a moderate-income CT. However, this was not considered during this performance evaluation since it was outside the evaluation period.

***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.

In determining the rating, the OCC weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from other financial institutions, the number of LMI geographies, branch presence, area demographics, and the location of most owner-occupied housing.

**Non-MSA AA**

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

**Lima MSA AA**

The OCC did not perform an analysis of the geographic distribution of loans in the Lima MSA AA. The bank's Lima MSA AA includes two CTs, of which both are middle- or upper-income geographies. Since the AA does not include any LMI CTs, a review of the geographic distribution of loans would not be meaningful.

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

In determining conclusions, the OCC gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of businesses located in moderate-income CTs within the AAs.

**Non-MSA AA**

The bank's geographic distribution of small loans to businesses is excellent in the Non-MSA AA. The percentage of small loans to businesses originated or purchased by the bank in moderate-income CTs exceeds both aggregate and demographic data. Competition for business loans remains strong in the AA.

Lima MSA AA

The OCC did not perform an analysis of the geographic distribution of loans in the Lima MSA AA. The bank's Lima MSA AA includes two CTs, of which both are middle- or upper-income geographies. Since the AA does not include any LMI CTs, a review of the geographic distribution of loans would not be meaningful.

***Lending Gap Analysis***

The OCC did not identify any unexplained, conspicuous gaps in the lending distribution during the review of bank reports and maps.

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

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

The bank's distribution of small loans to businesses is excellent. The bank's distribution of home mortgage loans to moderate-income borrowers is also excellent, given its market presence and competition. The OCC considered the impact of housing costs relative to median family income and the percentage of families below poverty. These performance context considerations and stronger performance for moderate-income borrowers offset the weaker performance for low-income borrowers.

***Home Mortgage Loans***

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

The 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.

Non-MSA AA

FNB's percentage of home mortgage loans to low-income borrowers is below both demographic and aggregate HMDA data. However, the bank's percentage of home mortgage loans to moderate-income borrowers exceeds demographic data and is near the aggregate percentage for all HMDA reporting lenders, demonstrating overall excellent performance.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for low-income borrowers. As stated above, overall median housing values are 4.7 times the weighted average of the median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to low-income families. Approximately 7.7 percent of the families live below the poverty level. Additionally, there is strong competition for loans in the Non-MSA AA. As stated above, FNB's home mortgage market share of 2.9 percent as of the 2021 Peer Mortgage Data ranks them 9<sup>th</sup> out of 196 lenders in the Non-MSA AA, with the top five lenders accounting for about 52.3 percent of the market share.

Lima MSA AA

FNB's percentage of home mortgage loans to low-income borrowers is slightly below aggregate data of other HMDA reporters and below demographic data. However, the bank's percentage of home mortgage loans to moderate-income borrowers significantly exceeds both the demographic and aggregate data, demonstrating excellent performance.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for low-income borrowers. As stated above, overall median housing values are 4.5 times the weighted average of the median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to low-income families. Approximately 7.6 percent of the families live below the poverty level. Additionally, there is strong competition for loans in the Lima MSA AA. As stated above, FNB's home mortgage market share of 13.1 percent as of the 2021 Peer Mortgage Data ranks them 3<sup>rd</sup> out of 52 lenders in the Lima MSA AA, with the top two lenders accounting for almost 40 percent of the market share.

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

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

Non-MSA AA

FNB exhibits an excellent distribution of small loans to businesses of different sizes within the Non-MSA AA. As evidenced in Table R of Appendix D, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less significantly exceeds aggregate data and is commensurate with demographic data.

Lima MSA AA

FNB exhibits an excellent distribution of small loans to businesses of different sizes within the Lima MSA AA. The bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less significantly exceeds aggregate data and exceeds demographic data as well.

**Responses to Complaints**

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

## Community Development Lending

FNB exhibits excellent responsiveness to CD lending needs, considering its capacity, need and availability of such opportunities for CD in the AAs, and its business strategy. In both 2020 and 2021, FNB offered loans through the SBA's PPP. This loan program was developed to help businesses keep their workforce employed during the COVID-19 pandemic.

FNB's participation in the SBA's PPP was particularly responsive to credit needs of businesses and enhanced the credit availability of this loan product. In 2021, FNB originated 204 qualified CD loans inside the AAs totaling \$7.2 million, which equates to almost 37 percent of total tier 1 capital as of December 31, 2021. Additionally, the bank originated 61 CD loans in the broader/statewide or regional area of Ohio, totaling \$2.4 million. The PPP loans originated in 2021 met the definition of CD as part of the 2020 OCC CRA Rule and the expanded CD definitions. However, loans made prior to October 1, 2020, were analyzed under the 1995 CRA Rule and only counted as CD loans if they had a primary purpose of CD as defined in that rule.

Refer to the Community Development Loans table below for the facts 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.

<b>Community Development Loans</b>				
Assessment Area	Total Loans			
	#	% of Total #	\$(000's)	% of Total \$
Non-MSA AA	151	57.0	5,651	58.6
Lima MSA AA	53	20.0	1,582	16.4
Statewide/Regional Loans with Direct Benefit – Allen County, Ohio	38	14.3	2,003	20.8
Statewide/Regional Loans with Indirect Benefit	23	8.7	411	4.3
<b>Total</b>	<b>265</b>	<b>100.0</b>	<b>9,647</b>	<b>100.0</b>
<i>Source: Bank Data; SBA PPP loans originated in 2021 in Ohio. Due to rounding, totals may not equal 100.0%.</i>				

### Non-MSA AA

In 2021, FNB originated 151 qualified CD loans inside the Non-MSA AA totaling \$5.7 million, which equates to approximately 39.8 percent of prorated tier 1 capital as of December 31, 2021, based on total deposits.

### Lima MSA AA

In 2021, FNB originated 53 qualified CD loans inside the Lima MSA AA totaling \$1.6 million, which equates to about 29.5 percent of prorated total tier 1 capital as of December 31, 2021, based on total deposits.



Statewide/Regional Loans

FNB is responsive to the CD needs in its AA so additional consideration was given to 61 CD loans, totaling \$2.4 million in the statewide/regional area of Ohio. The bank originated 38 PPP loans in 2021 outside its AAs but in Allen County, Ohio, totaling \$2 million. The bank originated 23 PPP loans in 2021 outside the AAs but in Ohio, totaling \$411,267. The bank's lending in the broader/statewide area represents 12.3 percent of the bank's total tier 1 capital.

## **Appendix A: Scope of Examination**

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

<b>Time Period Reviewed:</b>	1/1/19 – 12/31/21	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans Community development loans	
<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 Ohio</b>		
Non-MSA AA	Full-Scope	Putnam and Hancock Counties in Ohio – entire counties.
Lima MSA AA	Full - Scope	CTs 101 and 102 in Allen County, Ohio, in the Lima, OH MSA 30620.

## Appendix B: Summary of State Ratings

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RATINGS: THE FIRST NATIONAL BANK OF PANDORA	
Overall Bank:	Lending Test Rating
The First National Bank of Pandora	Outstanding
State:	
Ohio	Outstanding

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.



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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

State of Ohio

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000s)	% 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	111	15,231	21.3	306	0.0	0.0	0.0	0.0	0.0	0.0	52.0	27.9	42.5	48.0	72.1	57.5	0.0	0.0	0.0		
Non-MSA AA	411	67,073	78.7	4,609	0.0	0.0	0.0	6.3	8.0	6.5	30.9	31.6	29.2	62.8	60.3	64.4	0.0	0.0	0.0		
<b>Total</b>	<b>522</b>	<b>82,304</b>	<b>100.0</b>	<b>4,915</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.9</b>	<b>6.3</b>	<b>6.1</b>	<b>32.4</b>	<b>30.8</b>	<b>30.0</b>	<b>61.8</b>	<b>62.8</b>	<b>63.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$ (000s)	% 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	111	15,231	21.3	306	13.8	4.5	5.2	13.4	25.2	17.6	22.4	27.0	22.5	50.4	36.9	42.5	0.0	6.3	12.1		
Non-MSA AA	411	67,073	78.7	4,609	13.1	4.4	5.8	14.9	16.3	17.5	21.6	22.1	22.7	50.5	45.3	42.4	0.0	11.9	11.6		
<b>Total</b>	<b>522</b>	<b>82,304</b>	<b>100.0</b>	<b>4,915</b>	<b>13.1</b>	<b>4.4</b>	<b>5.8</b>	<b>14.7</b>	<b>18.2</b>	<b>17.5</b>	<b>21.6</b>	<b>23.2</b>	<b>22.7</b>	<b>50.5</b>	<b>43.5</b>	<b>42.4</b>	<b>0.0</b>	<b>10.7</b>	<b>11.6</b>		

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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			
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Lima MSA AA	42	4,123	41.2	76	0.0	0.0	0.0	0.0	0.0	0.0	37.3	26.2	38.2	62.7	73.8	61.8	0.0	0.0	0.0	
Non-MSA AA	60	6,281	58.8	1,684	0.0	0.0	0.0	12.2	13.3	11.7	31.9	31.7	33.0	55.9	55.0	55.3	0.0	0.0	0.0	
<b>Total</b>	<b>102</b>	<b>10,404</b>	<b>100.0</b>	<b>1,760</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.4</b>	<b>7.8</b>	<b>11.2</b>	<b>32.3</b>	<b>29.4</b>	<b>33.2</b>	<b>56.4</b>	<b>62.8</b>	<b>55.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 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												2019-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Lima MSA AA	42	4,123	41.2	76	79.6	88.1	63.2	6.3	11.9	14.2	0.0		
Non-MSA AA	60	6,281	58.8	1,684	78.0	75.0	43.8	6.8	25.0	15.1	0.0		
<b>Total</b>	<b>102</b>	<b>10,404</b>	<b>100.0</b>	<b>1,760</b>	<b>78.2</b>	<b>80.4</b>	<b>44.6</b>	<b>6.8</b>	<b>19.6</b>	<b>15.1</b>	<b>0.0</b>		

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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