



PUBLIC DISCLOSURE

August 14, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Park National Bank
Charter Number 9179
50 North Third Street
Newark, OH 43055

Office of the Comptroller of the Currency

Metro Center V
655 Metro Place South, Suite 625
Dublin, Ohio 43017

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

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Overall CRA Rating

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

The following table indicates the performance level of **The Park National Bank (“Park” or “bank”)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Park National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Park’s geographic distribution of home loans is good in the Columbus, OH, and Springfield, OH metropolitan areas (MAs) and adequate in the Mansfield, OH MA.
- Park’s geographic distribution of small loans to businesses is excellent in the Columbus, OH, Mansfield, OH and Springfield, OH MAs.
- Park’s overall distribution of loans to borrowers of different income levels is good.
- Retail branch distribution is adequate in both the Columbus, OH and Springfield, OH MAs and is excellent in the Mansfield, OH MA.
- Provision of community development services is excellent in both the Columbus, OH MA and Mansfield, OH MAs and is good in the Springfield, OH MA.
- Park’s investment test performance is excellent due to the investment in a Low-Income Housing Tax Credit statewide fund with a purpose, mandate, and function to create or rehabilitate affordable housing.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under the U.S. Department of Housing and Urban Development (HUD) Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one- to four-family dwellings other than manufactured housing.

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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA evaluation. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

Description of Institution

The Park National Bank is a \$7.4 billion bank headquartered in Newark, Ohio. Park is a subsidiary of Park National Corporation (PRK), a \$7.7 billion holding company headquartered in Newark, Ohio. The bank consists of 11 community bank divisions and two affiliated finance companies. Affiliate data was not considered in this evaluation. There has been no merger or acquisition activity since the previous CRA evaluation.

As of December 31, 2016, net loans and leases represented 70.1 percent of total assets. By dollar volume, the \$5.2 billion loan portfolio is 60 percent real estate, 16.9 percent commercial and industrial, 21.9 percent loans to individuals, and 1.2 percent agriculture. Tier One Capital totaled \$533 million.

The bank has 110 full service branches and 137 deposit-taking ATMs located in 12 assessment areas (AAs) in Ohio. We combined the rural AAs into one Ohio Non-MA AA for evaluation purposes, and we evaluated performance in each of the remaining five MAs: Columbus, Cincinnati, Dayton, Mansfield, and Springfield separately. Park ranks 6th, 13th, and 8th in deposit market share in the Columbus, Cincinnati, and Dayton AAs, respectively. Park ranks first in deposit market share in the Mansfield, Springfield, and Ohio Non-MA AAs. Primary competitors include Huntington, JP Morgan Chase, Fifth Third, and PNC. Since the previous CRA evaluation dated February 3, 2014, Park grew from \$6.6 billion in assets to \$7.4 billion as of December 31, 2016.

Park offers a full range of credit products, trust services, and non-depository investment services. The bank's primary focus is residential real estate lending and commercial real estate lending. Park also offers installment loans to individuals and commercial and industrial loans. The bank offers Federal Housing Administration (FHA), Veteran's Affairs and first-time homebuyer mortgage products. The bank also offers a full range of depository accounts and services through its retail branches throughout Ohio. Examples of traditional services available include free checking, health savings accounts, utility payment (also offered to non-customers), official checks and money orders. Further, the bank offers alternative banking products such as online banking, mobile banking, mobile messenger, e-statements, electronic bill pay, direct deposit, 24 hour banking by phone, and wire transfers.

No legal, financial, or other factors impeded the bank's ability to help meet the credit needs of its AAs during the evaluation period. The bank received a "Satisfactory" rating at the prior CRA evaluation dated February 3, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans the bank reported under the HMDA and small loans made to businesses and farms reported by the bank for the period from January 1, 2013, through December 31, 2016. We reviewed community development (CD) loans, investments, and services for the period from October 1, 2013, through December 31, 2016.

We analyzed 2013 lending data separately from the 2014 through 2016 lending data, and included summary statements of the bank's 2013 performance in appropriate sections of this report. This separate analysis was performed due to changes instituted by the Office of Management and Budget (OMB) MA geographic boundary revisions.

Tables and detailed narrative are limited to the 2014-2016 review period because the majority of the lending activity occurred during that portion of the four-year review period.

In all AAs, multifamily loans comprise a very small percentage of the bank's lending activity, and were considered only as additional performance context. All other loan products were analyzed whenever the bank originated at least 20 loans within the AA during either the 2013 or the 2014 through 2016 evaluation periods.

For lending performance, we placed more emphasis on borrower and geographic distributions than on market share performance. When there were differences in performance between loan products, including subcategories of home mortgage loans, we emphasized the products based on the loan mix by number of loans specific to the AA over the evaluation periods in determining an overall conclusion. Weightings by number of loans give consideration for each lending decision regardless of the loan's dollar amount.

Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's HMDA and CRA lending data. We also reviewed the appropriateness of CD activities provided for consideration in our evaluation. This review included testing of CD loans, investments, and services to determine if they meet the definition of CD as defined in the CRA. We determined that the data reported publicly and the additional data provided for this evaluation are accurate.

Selection of Areas for Full-Scope Review

We selected three AAs for full-scope reviews: Columbus, Mansfield, and Springfield. Full-scope reviews consider both quantitative analysis and performance context. Park's Columbus, OH AA was selected for full-scope review as it has the largest percentage of Park deposits of any AA and is the historic home of the bank. While significantly smaller amounts of deposits are obtained from both the Mansfield, OH MA and the Springfield, OH MA, Park is a primary leader in both of these smaller markets.

The Ohio Non-MA AA, Cincinnati and Dayton MA AAs were evaluated using a limited-scope review, which entails quantitative analysis only. On September 19, 2017, the bank closed its sole office in the Kentucky portion of the Cincinnati Multi-state MA (MMA), eliminating the need to consider performance in the Cincinnati MMA as a separate rating area. The office was a non-traditional facility and open for less than half of the total evaluation period. The area is served by a number of other banks.

Ratings

The bank's overall rating is derived entirely from its rating in the State of Ohio, based primarily on results in those areas that received full-scope reviews.

In our analysis of the bank's performance under the Lending Test geographic distribution and borrower income distribution criteria, we placed more emphasis on the bank's performance in 2014 through 2016 than performance in 2013. This was due to the time period covering a majority of the bank's performance along with it being more reflective of the bank's current performance.

We also weighted performance based on Park's deposit market share in each AA. AAs in order of importance, based on June 30, 2016, deposit market shares, are as follows: Columbus MA (39.1 percent of deposits); the Ohio Non-MA (33.2 percent of deposits); the Mansfield MA (9.2 percent of deposits); the Springfield MA (8.4 percent of deposits); the Dayton MA (5.9 percent of deposits); the Cincinnati MMA (4.2 percent of deposits).

Further, when evaluating the bank's performance under the Lending Test, during both review periods, we placed a greater emphasis on the bank's distribution of home mortgage loans than the distribution of small business loans or small farm loans. During the 2013 review period, greatest emphasis was placed on home refinance loans within the home mortgage category, secondary emphasis was placed on home purchase loans, and least emphasis placed on home improvement loans. During the 2014 through 2016 review period, greatest emphasis was placed on home purchase loans, secondary emphasis was placed on home refinance loans, with home improvement loans receiving least emphasis.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 assessment area 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.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Columbus, OH, Mansfield, OH and Springfield, OH MA(s) is good.

Lending Activity

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

The bank's overall lending activity in Ohio is good considering the strong level of competition for all types of loans in the bank's AA. Many competitors are national or regional banks.

In our analysis, we considered the low cost of entry into the loan origination market which increases competition, as compared to the high cost of entry into the traditional deposit gathering market. Park gathers deposits primarily through traditional branch offices. In all AAs, the bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2016.

Columbus, OH MA

Park's lending activity reflects excellent responsiveness to area credit needs in the Columbus, OH MA when considering the bank's deposits and significant competition. Park ranked sixth out of 51 depository institutions with a deposit market share of 3.8 percent. For home purchase loans, Park's market share of 2.2 percent ranked ninth out of 381 lenders. For home improvement loans, Park's market share of 12.1 percent ranked first out of 154 lenders. For home refinance loans, Park's market share of 2.3 percent ranked 10th out of 379 lenders. For small loans to businesses, Park's market share of 3 percent ranked ninth out of 98 lenders. For small loans to farms, Park's market share of 22.1 percent ranked first out of 24 lenders.

Mansfield, OH MA

Park's lending activity reflects good responsiveness to area credit needs in the Mansfield, OH MA when considering the bank's deposits. Park ranked first out of 14 depository institutions with a deposit market share of 29.2 percent. For home purchase loans, Park's market share of 11.6 percent ranked second out of 102 lenders. For home improvement loans, Park's market share of 27.8 percent ranked first out of 32 lenders. For home refinance loans, Park's market share of 8.6 percent ranked third out of 95 lenders. For small loans to businesses, Park's market share of 15.4 percent ranked first out of 43 lenders. For small loans to farms, Park's market share of 28.6 percent ranked first out of 14 lenders.

Springfield, OH MA

Park's lending activity reflects good responsiveness to area credit needs in the Springfield, OH MA when considering the bank's deposits. Park ranked first out of 12 depository institutions with a deposit market share of 32.4 percent. For home purchase loans, Park's market share of 3.9 percent ranked seventh out of 125 lenders. For home improvement loans, Park's market share of 28.8 percent ranked first out of 36 lenders. For home refinance loans, Park's market share of 3.9 percent ranked seventh out of 128 lenders. For small loans to businesses, Park's market share of 16.8 percent ranked first out of 44 lenders. For small loans to farms, Park's market share of 57.6 percent ranked first out of 16 lenders.

Distribution of Loans by Income Level of the Geography

Park's overall distribution of loans by income level of geography is good. The geographic distribution of home mortgage loans in the Columbus, OH and Springfield, OH MAs is good. The distribution of home mortgage loans in the Mansfield, OH MA is adequate. The geographic distribution of small loans to businesses in the Columbus, OH, Mansfield, OH and Springfield, OH MAs is excellent. The geographic distribution of small loans to farms in the Columbus, OH MA is good. The geographic distribution of small loans to farms in both the Mansfield, OH and Springfield, OH MAs is adequate.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Park's overall geographic distribution of home mortgage loans is good. Park's geographic distribution of home purchase loans in both the Columbus, OH MA and the Springfield, OH MA is good. Park's geographic distribution of home purchase loans in the Mansfield, OH MA is adequate. The geographic distribution of home improvement loans in the Columbus, OH MA and the Mansfield, OH MA is good. The geographic distribution of home improvement loans in the Springfield, OH MA is excellent. The geographic distribution of home refinance loans in the Columbus, OH MA is adequate, in the Mansfield, OH MA is poor, and in the Springfield, OH MA is good.

In the Columbus, OH and Springfield, OH MAs, we considered two factors relating to mortgage loan demand in low-income geographies. Those factors are a limited inventory of owner-occupied housing units, and the costs of buying, rehabilitating and maintaining a house of average age in low-income geographies. There are no low-income geographies in the Mansfield, OH MA. See the market profiles for additional information.

Home PurchaseColumbus, OH MA

Park's geographic distribution of home purchase loans in the Columbus, OH MA is good. The percentage of home purchase loans originated or purchased in low-income geographies was well below and in moderate-income geographies exceeded the percentages of owner-occupied

housing units located in those geographies. Park's percentage of home purchase loans originated or purchased in both low- and moderate-income geographies exceeded its overall market share for home purchase loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Mansfield, OH MA

Park's geographic distribution of home purchase loans in the Mansfield, OH MA is adequate. There were no low-income geographies in the Mansfield, OH MA. The percentage of home purchase loans originated or purchased in moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies. Park's percentage of home purchase loans originated or purchased in moderate-income geographies exceeded its overall market share for home purchase loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Springfield, OH MA

Park's geographic distribution of home purchase loans in the Springfield, OH MA is good. The percentage of home purchase loans originated or purchased in low-income geographies was well below and in moderate-income geographies exceeds the percentages of owner-occupied housing units located in those geographies. Park's percentage of home purchase loans originated or purchased in low-income geographies exceeded and in moderate-income geographies was below its overall market share for home purchase loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Home Improvement

We noted that management implemented a small dollar home improvement program to support properties in any low- or moderate-income geography in any AA.

Columbus, OH MA

Park's geographic distribution of home improvement loans in the Columbus, OH MA is good. The percentage of home improvement loans originated or purchased in low-income geographies was significantly below and in moderate-income geographies exceeded the percentages of owner-occupied housing units located in those geographies. Park's percentage of home improvement loans originated or purchased in low-income geographies was significantly below and in moderate-income geographies exceeded its overall market share for home improvement loans. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2016, but was still adequate.

Mansfield, OH MA

Park's geographic distribution of home improvement loans in the Mansfield, OH MA is good. There were no low-income geographies in the Mansfield, OH MA. The percentage of home improvement loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies. Park's percentage

of home improvement loans originated or purchased in moderate-income geographies exceeded its overall market share for home improvement loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Springfield, OH MA

Park's geographic distribution of home improvement loans in the Springfield, OH MA is excellent. The percentage of home improvement loans originated or purchased in low-income geographies exceeded and in moderate-income geographies was below the percentages of owner-occupied housing units located in those geographies. Park's percentage of home improvement loans originated or purchased in both low- and moderate-income geographies exceeded its overall market share for home improvement loans. In the Springfield, OH MA, we weighted performance in low-income geographies more heavily than in moderate-income geographies as the bank's home improvement lending volume in these low-income geographies demonstrated excellent responsiveness to this identified need. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Home Refinance

Columbus, OH MA

Park's geographic distribution of home refinance loans in the Columbus, OH MA is adequate. The percentage of home refinance loans originated or purchased in low-income geographies was significantly below and in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. Park's percentage of home refinance loans originated or purchased in low-income geographies was significantly below and in moderate-income geographies exceeded its overall market share for home refinance loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Mansfield, OH MA

Park's geographic distribution of home refinance loans in the Mansfield, OH MA is poor. There are no low-income geographies in the Mansfield, OH MA. The percentage of home refinance loans originated or purchased in moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies. Park's percentage of home refinance loans originated or purchased in moderate-income geographies was below its overall market share for home refinance loans. The bank's performance in 2013 was better than the performance noted in 2014 through 2016, and was adequate.

Springfield, OH MA

Park's geographic distribution of home refinance loans in the Springfield, OH MA is good. The percentage of home refinance loans originated or purchased in low-income geographies was below and in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. Park's percentage of home refinance loans originated or purchased in both low- and moderate-income geographies exceeded its overall

market share for home refinance loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Columbus, OH MA

Park's geographic distribution of small loans to businesses in the Columbus, OH MA is excellent. The percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeded the percentage of businesses located in those geographies. Park's percentage of small loans to businesses originated or purchased in low-income geographies exceeded and in moderate-income geographies is near to its overall market share of small loans to businesses. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Mansfield, OH MA

Park's geographic distribution of small loans to businesses in the Mansfield, OH MA is excellent. There were no low-income geographies in the Mansfield, OH MA. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies. Park's percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded its overall market share of small loans to businesses. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Springfield, OH MA

Park's geographic distribution of small loans to businesses in the Springfield, OH MA is excellent. The percentage of small loans to businesses originated or purchased in low-income geographies was near to and in moderate-income geographies approximated the percentage of businesses located in those geographies. Park's percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeded its overall market share of small loans to businesses. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2016, but was still good.

Small Loans to Farms

Refer to Table 7 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Columbus, OH MA

Park's geographic distribution of small loans to farms in the Columbus, OH MA is good. The percentage of small loans to farms originated or purchased in low-income geographies was significantly below and in moderate-income geographies exceeded the percentage of farms

located in those geographies. Park's percentage of small loans to farms originated or purchased in low-income geographies was significantly below and in moderate-income geographies exceeded its overall market share of small loans to farms. We noted a very small number of farms in low-income geographies; thus, limited opportunities to lend. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Mansfield, OH MA

Park's geographic distribution of small loans to farms in the Mansfield, OH MA is adequate. There were no low-income geographies in the Mansfield, OH MA. The percentage of small loans to farms originated or purchased in moderate-income geographies was significantly below the percentage of farms located in those geographies. Park's percentage of small loans to farms originated or purchased in moderate-income geographies was significantly below its overall market share of small loans to farms. We noted a very small number of farms in moderate-income geographies; thus, limited opportunities to lend. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Springfield, OH MA

Park's geographic distribution of small loans to farms in the Springfield, OH MA is adequate. The percentage of small loans to farms originated or purchased in both low- and moderate-income geographies was significantly below the percentage of farms located in those geographies. Park's percentage of small loans to farms originated or purchased in low-income geographies was significantly below and in moderate-income geographies was below its overall market share of small loans to farms. We noted a very small number of farms in both low- and moderate-income geographies; thus, limited opportunities to lend. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed Park's home mortgage and small business lending activity over the evaluation periods to identify any gaps in the geographic distribution of loans. We did not identify any conspicuous gaps in any of the full-scope AAs analyzed.

Inside/Outside Ratio

For the 2014 through 2016 evaluation period, Park originated a substantial majority of all loan products inside the bank's AAs (92 percent). This ratio is a bank-wide calculation, and not calculated by AA. Analysis was limited to bank originations and purchases, and did not include any affiliate data. The percentage in number of loans made inside the AAs by loan type were as follows: home purchase loans (91.2 percent), home refinance loans (94.4 percent), home improvement loans (92.6 percent), small loans to businesses (92.3 percent), and small loans to farms (88.3 percent). Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Distribution of Loans by Income Level of the Borrower

Park's overall distribution of loans to borrowers of different income levels is good. The borrower distribution of home mortgage loans in the Columbus, OH, Mansfield, OH and Springfield, OH MAs is good. The borrower distribution of small loans to businesses in the Columbus, OH, Mansfield, OH and Springfield, OH MAs is good. The borrower distribution of small loans to farms in the Columbus, OH MA and Mansfield, OH MAs is excellent and in the Springfield, OH MA is good.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Park's overall borrower distribution of home mortgage loans is good. Park's borrower distribution of home purchase loans in the Columbus, OH, Mansfield, OH and Springfield, OH MAs is good. The borrower distribution of home improvement loans in the Columbus, OH MA is excellent. In both the Mansfield, OH and Springfield, OH MAs, the borrower distribution of home improvement loans is good. The borrower distribution of home refinance loans in the Columbus, OH, Mansfield, OH and Springfield, OH MAs is good.

We considered the significant poverty rate in all three AAs, and the barrier this presents to homeownership, in our analysis. We also considered the median price of housing in all three AAs relative to the maximum income of borrowers in the low-income category, which also demonstrated a significant barrier to homeownership. See market profiles for additional information.

Home Purchase

Columbus, OH MA

Park's borrower distribution of home purchase loans in the Columbus, OH MA is good. The percentage of home purchase loans originated or purchased to low-income borrowers was below and to moderate-income borrowers exceeded the corresponding percentages of low- and moderate-income families in the AA. Park's percentage of home purchase loans originated or purchased to low-income borrowers exceeded and to moderate-income borrowers approximated its overall market share for home purchase loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Mansfield, OH MA

Park's borrower distribution of home purchase loans in the Mansfield, OH MA is good. The percentage of home purchase loans originated or purchased to low-income borrowers was below and to moderate-income borrowers exceeded the corresponding percentages of low- and moderate-income families in the AA. Park's percentage of home purchase loans originated or purchased to low-income borrowers exceeded and to moderate-income borrowers was near to its overall market share of home purchase loans. Performance during

the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Springfield, OH MA

Park's borrower distribution of home purchase loans in the Springfield, OH MA is good. The percentage of home purchase loans originated or purchased to low-income borrowers was below and to moderate-income borrowers exceeded the corresponding percentages of low- and moderate-income families in the AA. Park's percentage of home purchase loans originated or purchased to low- income borrowers exceeded and to moderate-income borrowers was near to its overall market share of home purchase loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Home Improvement

Columbus, OH MA

Park's borrower distribution of home improvement loans in the Columbus, OH MA is excellent. The percentage of home improvement loans originated or purchased to low-income borrowers was near to and for moderate-income borrowers exceeded the corresponding percentages of low- and moderate-income families in the AA. Park's percentage of home improvement loans originated or purchased to both low- and moderate-income borrowers exceeded its overall market share for home improvement loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Mansfield, OH MA

Park's borrower distribution of home improvement loans in the Mansfield, OH MA is good. The percentage of home improvement loans originated or purchased to low-income borrowers was below and to moderate-income borrowers exceeded the corresponding percentage of low- and moderate-income families in the AA. Park's percentage of home improvement loans originated or purchased to both low- and moderate-income borrowers exceeded its overall market share for home improvement loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Springfield, OH MA

Park's borrower distribution of home improvement loans in the Springfield, OH MA is good. The percentage of home improvement loans originated or purchased to low-income borrowers was below and to moderate-income borrowers exceeded the corresponding percentages of low- and moderate-income families in the AA. Park's percentage of home improvement loans originated or purchased to low-income borrowers exceeded and to moderate-income borrowers was below its overall market share for home improvement loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Home RefinanceColumbus, OH MA

Park's borrower distribution of home refinance loans in the Columbus, OH MA is good. The percentage of home refinance loans originated or purchased to low-income borrowers was below and to moderate-income borrowers exceeded the corresponding percentage of low- and moderate-income families in the AA. Park's percentage of home refinance loans originated or purchased to both low- and moderate-income borrowers exceeded its overall market share for home improvement loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Mansfield, OH MA

Park's borrower distribution of home refinance loans in the Mansfield, OH MA is good. The percentage of home refinance loans originated or purchased to low-income borrowers was below and to moderate-income borrowers exceeded the corresponding percentage of low- and moderate-income families in the AA. Park's percentage of home refinance loans originated or purchased to both low- and moderate-income borrowers exceeded its overall market share for home improvement loans. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Springfield, OH MA

Park's borrower distribution of home refinance loans in the Springfield, OH MA is good. The percentage of home refinance loans originated or purchased to low-income borrowers was below and to moderate-income borrowers exceeded the corresponding percentage of low- and moderate-income families in the AA. Park's percentage of home refinance loans originated or purchased to both low- and moderate-income borrowers exceeded its overall market share for home improvement loans. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2016, but was still adequate.

Small Loans to Businesses

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Columbus, OH MA

The borrower distribution of small loans to businesses in the Columbus, OH MA is good. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) originated or purchased was well below the percentage of small businesses in the AA. The bank's market share of small loans to small businesses exceeded the bank's overall market share of small loans to all businesses. We consider Park to be more responsive than many of the banks with higher market share as most of those banks have significant credit card portfolios with much smaller average loan sizes. Performance during the 2013 evaluation period was not inconsistent with the performance noted in 2014 through 2016.

Mansfield, OH MA

The borrower distribution of small loans to businesses in the Mansfield, OH MA is good. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) originated or purchased was below the percentage of small businesses in the AA. The bank's market share of small loans to small businesses exceeded the bank's overall market share of small loans to all businesses. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2016, but was still adequate.

Springfield, OH MA

The borrower distribution of small loans to businesses in the Springfield, OH MA is good. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) originated or purchased was below the percentage of small businesses in the AA. The bank's market share of small loans to small businesses exceeded the bank's overall market share of small loans to all businesses. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2016, but was still good/adequate.

Small Loans to Farms

Refer to Table 12 in the appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

Columbus, OH MA

The borrower distribution of small loans to farms in the Columbus, OH MA is excellent. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) originated or purchased was near to the percentage of small farms in the AA. The bank's market share of small loans to small farms exceeded the bank's overall market share of small loans to all farms. We consider Park more responsive than many of the banks with higher market share as most of those banks have significant credit card portfolios with much smaller average loans sizes. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2016, but was still good.

Mansfield, OH MA

The borrower distribution of small loans to farms in the Mansfield, OH MA is excellent. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) originated or purchased was near to the percentage of small farms in the AA. The bank's market share of small loans to small farms exceeded the bank's overall market share of small loans to all businesses. We consider Park to be more responsive than many of the other bank in this market, as most of those banks have significant credit card portfolios with much smaller average loans sizes. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2016, but was still adequate.

Springfield, OH MA

The borrower distribution of small loans to farms in the Springfield, OH MA is good. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) originated or purchased was below the percentage of small farms in the AA. The bank's market share of small loans to small farms exceeded the bank's overall market share of small loans to all farms. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2016, but was still adequate.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however. We did not consider any of the loans innovative or complex.

Columbus, OH MA

Community development lending in the Columbus, OH MA has a positive impact on the lending test conclusion. Park's level of community development lending is adequate in the Columbus, OH, MA. Park made 32 community development loans totaling \$17.7 million, which represented 3.3 percent of allocated Tier One Capital. By dollar volume, 77.2 percent of community development loans funded affordable housing, 21.1 percent funded economic development, and 1.7 percent funded community services.

Park originated 18 affordable housing loans to finance 224 new or rehabilitated units for low- and moderate-income families. Park also originated six community service loans, resulting in additional operating funds to organizations focused on the needs of children from low- or moderate-income families, and homes for disabled adults.

Park provided construction financing on a 21 unit, two-bedroom apartment complex in Lancaster, Ohio that will provide permanent supportive housing to chemically dependent persons and their children who are homeless or at risk of homelessness. The location is a moderate-income geography with easy access to amenities such as schools, medical facilities, and support services.

Park provided financing to rehabilitate a 72 unit affordable housing complex in London, Ohio. The complex is over 40 years old and was serious need of rehabilitation. The rehabilitation work increased housing units for the disabled, improved energy efficiency, as the complex is now certified as an Enterprise Green Community, and increased green space available to residents.

Park also provided operating funds to a housing organization that operates 40 housing units for homeless families or families at risk of homelessness in the form of a line of credit with on-going renewals. The organization also has a strong track record of assisting its clients in finding long-term permanent housing.

The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2016.

Mansfield, OH MA

Community development lending in the Mansfield, OH MA has a negative impact on the lending test. Park's level of community development lending is inadequate in the Mansfield, OH, MA, as Park made no community development loans. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2016.

Springfield, OH MA

Community development lending in the Springfield, OH MA has a neutral impact on the lending test conclusion. Park's level of community development lending is adequate in the Springfield, OH, MA. Park made six community development loans totaling \$0.9 million, which represented 2 percent of allocated Tier One Capital. All loans served to revitalize or stabilize low- or moderate-income areas of Springfield, OH.

Park initiated a lending relationship with the Clark County Land Reutilization Corporation (Land Bank) in 2014, which is an organization chartered by the State of Ohio in the wake of the financial crisis. The Clark County Land Bank exists to re-purpose unproductive parcels that are abandoned or neglected properties. Park provides working capital to the Clark County Land Bank in the form of a line of credit that was renewed twice during the review period.

Park also has a lending relationship with a 501(c)(3) non-profit organization in Springfield, OH involved in the provision of revitalization and stabilization activities. Park's loans to the non-profit are used by the organization for working capital to enable the acquisition, rehabilitation and sales of residential properties in Springfield, OH. The non-profit hires underprivileged area youth to work on the properties in a focused effort to teach employment skills in construction and related trades. The founder of this non-profit also operates a community center in a former high school in a low-income area of Springfield, OH. The non-profit also receives donated foreclosed properties from area banks.

The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2016.

Performance in the Broader Statewide or Regional Area

Park is generally responsive to community development needs and opportunities in its AAs, therefore we also gave consideration to community development lending in broader statewide or regional areas that involved borrowers without a documented purpose, mandate or function of community development. The impact of these loans in the broader statewide or regional areas has a neutral impact on the lending test conclusion.

Park's level of community development lending is adequate in the broader statewide and regional areas. The broader areas we considered included the State of Ohio and the Appalachia Region. The Appalachia Region includes three portions of three different Park AAs

in Southern Ohio. Park made 12 community development loans totaling \$25.4 million in these areas. By dollar volume, 97.2 percent funded affordable housing and 2.8 percent funded community services. Ten loans were in Ohio outside of any of the AAs, two of the loans were in West Virginia.

Park originated seven affordable housing loans to finance 310 new or rehabilitated units for low- and moderate-income families. Park also originated four community service loans, resulting in additional operating funds to organizations focused on health and wellness needs of low- or moderate-income families, and homes for disabled adults.

Park originated an affordable housing loan for \$4.2 million resulting in the construction of 38 new affordable housing units in the small city of Chillicothe, in Ross County in southern Ohio. Per the U.S. Census Bureau, as of July 1, 2016, Ross County has an above average poverty rate of 17.8 percent and is comprised of multiple geographies that are designated either low- or moderate-income. Documented market demand for affordable housing in the area was significant.

Park also originated a permanent construction loan for \$5.7 million in Upshur County, WV, that resulted in the creation of 40 units of affordable housing for seniors. Upshur County, WV was designated a distressed middle-income county in 2015 and 2016. Per the U.S. Census Bureau, as of July 1, 2016, Upshur County, WV had a significant poverty rate of 17.3 percent.

The bank's performance in 2013 was weaker than the performance noted in 2014 through 2016.

Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on the lending test conclusion. Park makes limited use of innovative and flexible lending programs.

Park created a small dollar home improvement loan product that may only be used on loans secured by properties located in low- or moderate-income geographies. This product was created in response an identified need for such financing in areas with predominantly older housing stock.

Park also offers mortgage financing through the American Dream Down Payment Initiative (ADDI) grant program. These grants can be used by a low- or moderate-income families located in the Columbus City School District in conjunction with a home mortgage loan.

We noted other products with flexible underwriting criteria offered by Park that are frequently options for low- or moderate-income families, including Freddie Mac's Home Possible, the Federal Home Loan Bank of Cincinnati's Welcome Home, and Fannie Mae's Home Ready and FHA mortgage loans.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in both the Cincinnati MMA and the Ohio Non MA is not inconsistent with the bank's overall "High

Satisfactory” performance under the lending test. In the Dayton, OH MA, the bank’s performance is weaker than the bank’s overall lending test performance, but was still adequate. In the Dayton, OH MA, the bank’s performance was weaker due to the geographic distribution of both the HMDA reportable loans and the small loans to businesses.

Refer to Tables 1 through 12 in appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the investment test is rated “Outstanding.” Based on full-scope reviews, the bank’s performance in the Columbus, OH MA is excellent, in the Mansfield, OH MA is poor, and in the Springfield, OH MA is good.

Columbus, OH MA

The quantity of qualifying investments in the Columbus, OH MA is excellent. Affordable housing needs are supported through affordable housing projects throughout the AA. During the review period, the bank’s investment in a Low-Income Housing Tax Credit (LIHTC) fund through the Ohio Capital Corporate for Housing (OCCH), resulted in the creation or rehabilitation of 1,363 affordable housing units, 1,025 of which were located in Franklin County where the affordable housing needs are greatest as evidenced by the high poverty rate. Park made 66 qualified grants to organizations that support child welfare, homeless shelters, and emergency food needs of low- and moderate-income families in their community. The responsiveness to identified investment needs is adequate, as affordable housing is an identified need.

Mansfield, OH MA

The quantity of qualifying investments in the Mansfield, OH MA is poor. The OCCH serves all Ohio counties and in the past has completed projects in this AA; however, no affordable housing projects were completed during the current review period. No qualifying grants were noted in this AA. The responsiveness to identified investment needs is poor. While needs are less in Mansfield than in the bank’s larger AAs, there are investment opportunities.

Springfield, OH MA

The quantity of qualifying investments in the Springfield, OH MA is good. Affordable housing needs are supported through affordable housing projects throughout the assessment area. During the review period, the bank’s investment in the OCCH LIHTC fund resulted in the creation or rehabilitation of 99 affordable housing units. Park made 23 qualified grants to organizations that support homeless shelters, emergency food, and medical needs of low- and moderate-income families in their community. The responsiveness to identified investment needs is adequate, as affordable housing is an identified need.

Broader Statewide Area

The large majority of Park's qualified investments respond to the state's need for affordable housing through the OCCH LIHTC fund described above. The OCCH is an independent, mission-driven nonprofit that works with private and public developers to create affordable housing opportunities throughout Ohio. Most of the units created or rehabilitated during the review period were located in one of the bank's AAs. The allocated performance in each of the AAs was based on information provided by OCCH on the number of housing projects and associated units created or rehabilitated in each of the bank's AAs. The funded portion of the LIHTC investment represents 9.6 percent of Tier One Capital.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Cincinnati, OH MA, Dayton, OH MA and the Ohio Non-MA is excellent and is not inconsistent with the bank's overall outstanding performance under the investment test. Refer to Table 14 in appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Columbus, OH MA is good, in the Mansfield, OH MA is excellent, and in the Springfield, OH MA is adequate.

Retail Banking Services

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Columbus, OH MA

Park's branch distribution in the Columbus, OH MA is adequate, considering the population in the low-income geographies and number of branches in or near to low- and moderate-income (LMI) geographies. Branches are reasonably accessible to geographies and individuals of different income levels in the assessment area. Although there was only one branch located in a low-income geography, there were 11 branches located in moderate-income geographies. The percentage of branches in low-income geographies is well below the percentage of the population in low-income geographies. The percentage of branches located in the moderate-income geographies exceeds the percentage of the population in the moderate-income geographies. Further, two additional branches located in retail developments in middle-income geographies were across the street from moderate-income geographies; thus, both branches are considered to serve moderate-income geographies.

Branch openings and closings have not affected the accessibility of the bank's delivery systems. The bank opened three and closed seven branches in the AA during the evaluation period. The bank did not open any branches located in a low- or moderate-income geographies from 2013 to 2016. The bank closed two offices located in moderate-income geographies and none in low-income geographies. One closure in a moderate-income geography was within two miles of a remaining office that possesses superior parking and the closed office did not have a drive-through facility or a reasonable space for an ATM. The other closure in a moderate-income geography was in a grocery store; the closure occurred due to the grocery store moving and Park opened a new office in the new grocery store location.

Branch hours and services do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. We placed no significant emphasis on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the credit needs of LMI individuals.

Mansfield, OH MA

Park's branch distribution in the Mansfield, OH MA is excellent. Branches are readily accessible to essentially all portion of geographies and individuals of different income levels in the assessment area. There are no low-income geographies in the MA. There are five branches located in moderate-income geographies. The percentage of branches in moderate-income geographies exceeds the percentage of the population in moderate-income geographies.

Openings and closing have not affected the accessibility of the bank's delivery systems to LMI geographies or individuals. The bank did not open any branches during the assessment period and closed only one branch in 2016, which was located in a middle-income geography.

Branch hours and services do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. We placed no significant emphasis on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the credit needs of LMI individuals.

Springfield, OH MA

Park's branch distribution in the Springfield, OH MA is adequate. Branches are reasonably accessible to geographies and individuals of different income levels in the assessment area.

There is one branch located in a low-income geography. The percentage of branches in low-income geographies is below the percentage of the population in low-income geographies. There is one branch located in a moderate-income geography. The percentage of branches located in the moderate-income geographies was also below the percentage of the population in the moderate-income geographies. However, there was also one branch in a middle-income geography in a retail development. That branch was across the street from a moderate-income geography and it serves that moderate-income geography.

Branch openings and closings have not affected the accessibility of the bank's delivery systems. Management did not open or close any branches during the evaluation period.

Branch hours and services do not vary in a way that inconveniences portions of the AA, particularly LMI individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. We placed no significant emphasis on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the credit needs of LMI individuals.

Community Development Services

Park's performance in providing CD services is excellent. In the Columbus, OH and Mansfield, OH MAs, Park's CD service performance is excellent. Park's CD service performance in the Springfield, OH MA is good. CD services focused on community services, affordable housing and to a lesser extent economic development and revitalization and stabilization efforts. Bank employees participated in a large number of organizations, often in leadership roles.

Columbus, OH MA

Park's performance in providing community development services in the Columbus, OH AA is excellent. In the Columbus, OH MA, 67 different employees provided their expertise to 62 different community development organizations. In 48 instances, we noted employees serving as either board or committee members of community development organizations. Those organizations operate to help meet community needs such as affordable housing, economic development, alleviation of homelessness, or child welfare of LMI individuals.

We found certain board memberships to be particularly impactful. Examples noted include board memberships on local foreclosure prevention organizations, a local chapter of an organization that builds and repairs houses in low-income areas, and a homeless shelter. Park employees taught 39 financial literacy courses in area schools where the majority of students are eligible for reduced-price or free lunches.

Mansfield, OH MA

Park's performance in providing community development services in the Mansfield, OH AA is excellent. In the Mansfield, OH AA, 25 different employees provided their expertise to 14

different community development organizations. In 11 instances, we noted employees serving as either board or committee members of community development organizations. Those organizations operate to help meet community needs such as affordable housing, economic development, alleviation of homelessness, or child welfare of LMI individuals.

We found certain board memberships to be particularly impactful. Examples noted include board memberships on a local land reutilization organization, a local chapter of an organization that builds and repairs houses in low-income areas, and a homeless shelter. Park employees taught 12 financial literacy courses in area schools where the majority of students are eligible for reduced-price or free lunches.

Springfield, OH MA

Park's performance in providing community development services in the Springfield, OH AA is good. In the Springfield, OH AA, 14 different employees provided their expertise to 15 different community development organizations. In 11 instances, we noted employees serving as either board or committee members of community development organizations. Those organizations operate to help meet community needs such as affordable housing, economic development, alleviation of homelessness, or child welfare of LMI individuals.

We found certain board memberships to be particularly impactful. Examples noted include board memberships on a small business development organization, an adult literacy organization, and a local housing authority.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Cincinnati MMA, the Dayton MA and the Ohio Non-MA is weaker than the bank's overall performance. The primary reason for this conclusion was inferior branch distribution in relation to low- and moderate-income geographies when compared to the Columbus, OH and Mansfield, OH MAs. The bank's performance in the limited-scope AAs was not inconsistent with its performance in the Springfield MA.

Refer to Table 15 in appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Evaluation

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 metropolitan and nonmetropolitan areas that received comprehensive evaluation review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/13 to 12/31/16 Investment and Service Tests and CD Loans: 10/01/13 to 12/31/16	
Financial Institution	Products Reviewed	
The Park National Bank (Park) Newark, OH	Home Purchase; Home Improvement; Home Refinance; Small Business; Small Farm; CD loans; Qualified Investments; Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Evaluation		
Assessment Area	Type of Eval	Other Information
Columbus, OH MA #18140	Full-Scope	Fairfield, Franklin, Licking, Madison, and Morrow Counties (2013 to 2016). Hocking and Perry Counties (2014 to 2016)
Mansfield, OH MA #31900	Full-Scope	Richland County
Springfield, OH MA #44220	Full-Scope	Clark County
Cincinnati, OH MMA #17140	Limited-Scope	Butler, Clermont, Hamilton, and Warren Counties
Dayton, OH MA #19380	Limited-Scope	Greene, Miami, and Montgomery Counties
Ohio Non-MA #99999	Limited-Scope	Ashland, Athens, Champaign, Coshocton, Crawford, Darke, Fayette, Holmes, Knox, Marion, Mercer, Muskingum, Tuscarawas, and Wayne Counties (2014- 2016) Ashland, Athens, Champaign, Coshocton, Crawford, Darke, Fayette, Hocking, Holmes, Knox, Marion, Mercer, Muskingum, Perry, and Tuscarawas Counties (2013)

Appendix B: Community Profiles for Full-Scope Areas

Demographic Information for Full-Scope Area: Columbus, OH MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	375	16.27	27.20	32.27	23.73	0.53
Population by Geography	1,619,762	11.42	24.06	36.34	27.73	0.45
Owner-Occupied Housing by Geography	389,773	5.57	21.85	39.71	32.87	0.00
Businesses by Geography	103,339	9.38	22.13	33.64	34.45	0.40
Farms by Geography	2,963	4.29	17.72	51.37	26.55	0.07
Family Distribution by Income Level	392,926	23.08	18.14	21.20	37.58	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	161,964	17.27	34.50	35.17	13.06	0.00
Median Family Income	= \$64,914					
HUD Adjusted Median Family Income for 2016	= \$69,100					
Households Below the Poverty Level	= 14%					
				Median Housing Value	= \$154,828	
				Unemployment Rate	= 4.13%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2016 HUD updated MFI.

The Columbus, OH MA AA has been defined to include the whole counties where Park branches are located, and includes the following in the Columbus, OH MA, #18140: Fairfield, Franklin, Licking, Madison, Morrow, Hocking, and Perry Counties.

In February 2013, the Office of Management and Budget (OMB) added Hocking and Perry counties to the Columbus, OH MA due to commuting patterns and other economic data based on the 2010 Census. The new definitions are effective for HMDA data collected on and after January 1, 2014.

The Columbus, OH MA ranked 32nd among all 381 MAs in the United States and is the third largest metropolitan area in the State of Ohio. Based on U.S. Census Bureau data, population within the AA increased by 7 percent from 2010 to 2016, far greater than the state of Ohio, which grew by only 0.7 percent. Franklin County, where the city of Columbus is located, is easily the largest county in the AA with an estimated 2016 population of 1.3 million, or 78 percent of the AA population. Franklin County grew by 8.7 percent from 2010 to 2016. Fairfield and Licking Counties experienced steady net population increases since 2010, growing by 4.4 and 3.6 percent, respectively. The populations of Hocking, Madison, Morrow and Perry Counties were essentially unchanged since the 2010 census. Hocking, Madison, Morrow, and Perry Counties remain primarily rural with the majority of the land in farms. As of June 2017 (the most recent data available from the Bureau of Labor Statistics (BLS)), the preliminary unemployment rates ranged from a low of 4.2 percent in Madison County to a high of 5.8 percent in Perry County, with Franklin County at 4.4 percent, Licking County at 4.6

percent, and Fairfield County at 4.7 percent. The local unemployment rates are similar to the nationwide rate of 4.4 percent and compare favorably to the statewide rate of 5.5 percent. According to the U.S. Census Bureau, the poverty rate is significant at 14 percent in the AA, and 17 percent in Franklin County.

The Columbus, OH MA has a well-diversified economy. Economic analysis by Moody's indicates the Columbus, OH MA is the fastest growing metropolitan area in the state, has a low cost of doing business and a highly educated population. The area has experienced steady population growth for many years. Weaknesses noted by Moody's were continued sluggish single family home construction and per capita income that is below the national average. Based on data from the BLS, key employment sectors include trade, transportation, utilities, professional and business services, government, education, health services, and leisure and hospitality. Major employers include Ohio State University, the State of Ohio, JP Morgan Chase, OhioHealth, and Nationwide Insurance.

Data from the 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units range from a low of \$91,800 in Perry County to a high of \$163,100 in Fairfield County. The Franklin County median housing value of owner-occupied housing units was \$150,600. Based on the Federal Housing Finance Authority (FHFA) Housing Price Index (HPI) calculator, housing values increased approximately 13 percent over the evaluation period. Based on the 2016 median family income of \$69,100, low-income families make less than \$34,550 and moderate-income families make less than \$55,280. Depending on the county, median housing values are 2.7 to 4.7 times the annual income of low-income families. In Fairfield, Franklin, Licking and Madison Counties, median housing values are 4.3 to 4.7 times the annual income of low-income families, thus a homeownership affordability issue exists for low-income families. The housing costs relative to income have a limiting effect on mortgage demand among low-income families. No such limiting effect is noted for moderate-income families.

We also note that the percent of families who reside in low-income geographies is far higher than the percent of owner-occupied housing units in those low-income geographies. For instance in 2016, 17.3 percent of families resided in low-income geographies while only 5.6 percent of owner-occupied housing units are located in those geographies.

According to the 2010 U.S. Census, the median age of housing stock in low-income geographies is 58 years. This is compared to 44 years for the Columbus AA in its entirety. Older housing often costs more to maintain and frequently requires significant repairs to bring the dwelling up to current code requirements. Older homes are typically less energy efficient and often result in higher heating and cooling costs which add to the overall costs of homeownership. The increased energy costs and additional expenses related to rehabilitation can limit the ability of low-income families to qualify for mortgages secured by such properties.

Overall, opportunities for home mortgage lending in low-income geographies and to low-income families are limited due to: median values of existing homes relative to the income of low-income families; a limited inventory of owner-occupied units; significant poverty rates, and the associated costs of buying, rehabilitating, and maintaining a house of average age in low-income geographies.

Competition is strong with 51 other FDIC-insured depository institutions operating 538 offices in the AA. Park operates 30 offices in the AA and has 3.8 percent deposit market share which ranks sixth among all financial institutions. Major competitors include Huntington National Bank with 76 offices and 32.2 percent deposit market share, JP Morgan Chase with 66 offices and 22.1 percent deposit market share and PNC Bank with 54 offices and 9.7 percent deposit market share. These competitors all have many more banking offices than Park in Franklin County, which has the large majority of low-income geographies in the AA. Park's deposit market share in Franklin County is 0.3 percent.

Information from community contact interviews identified the following needs within the Columbus, OH MA:

- Affordable housing
- Low-cost construction financing
- Rehabilitation loans
- Purchase of LIHTCs
- Volunteer Income Tax Assistance (VITA) volunteers
- Quality employment opportunities
- Assistance with basic life needs such as food and utilities
- Financial literacy
- General operating funds for community service organizations
- Economic development and revitalization

The Columbus, OH MA yields abundant community development opportunities. There are many community development and social services organizations in the AA. Local governments have designated many areas for redevelopment and use a variety of resources to increase investments in those areas.

Demographic Information for Full-Scope Area: Mansfield, OH MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	30	0.00	36.67	43.33	20.00	0.00
Population by Geography	124,475	0.00	27.88	45.91	26.21	0.00
Owner-Occupied Housing by Geography	34,588	0.00	20.04	49.63	30.33	0.00
Businesses by Geography	6,212	0.00	28.27	45.12	26.61	0.00
Farms by Geography	339	0.00	5.60	62.24	32.16	0.00
Family Distribution by Income Level	32,844	18.37	20.51	21.55	39.57	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	12,767	0.00	35.33	46.26	18.41	0.00
Median Family Income = 54,637 HUD Adjusted Median Family Income for 2016 = 50,500 Households Below the Poverty Level = 12%					Median Housing Value = 108,098 Unemployment Rate = 4.30%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI.

The Mansfield, OH MA AA has been defined to include Richland County, Ohio in its entirety. Based on U.S. Census Bureau data, population within the AA decreased by 2.7 percent from 2010 to 2016, which compares unfavorably to the state of Ohio, which grew by 0.7 percent. As of June 2017 (the most recent data available from the BLS), the preliminary unemployment rate in Richland County was 5.6 percent which is similar to the statewide rate of 5.5 percent and compares unfavorably to the nationwide rate of 4.4 percent. The poverty rate is significant at 12 percent.

Economic analysis by Moody’s indicates the Mansfield, OH MA is growing slowly as job creation lags both state and regional averages. The economy is not well diversified with over reliance on manufacturing sited. Demographics for future business growth are weak do to a slowly declining population, a trend which began 15 years ago. Based on data from the BLS, key employment sectors include manufacturing, education and health services, government, and retail trade. Major employers include MedCentral Health System, Newman Technology, Jay Industries, the Gorman-Rupp Company, and CenturyLink.

Data from the 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units was \$102,500 in the AA. Based on the FHFA HPI calculator, housing values increased approximately 12 percent over the evaluation period in the Mansfield AA. Based on the 2016 median family income of \$50,500, low-income families make less than \$25,250 and moderate-income families make less than \$40,400. Median housing values are 4.1 times the annual income of low-income families, thus a homeownership affordability issue exists for low-income families. The housing costs relative to income have a limiting effect on mortgage demand among low-income families. No such limiting effect is noted for moderate-income families.

Overall, opportunities for home mortgage lending to low-income families are limited due to median values of existing homes relative to the income of low-income families and a significant poverty rate.

Given the estimated 2016 population of the AA is just 121,000, competition is significant with 14 other FDIC-insured depository institutions operating 48 offices. Park operates 12 offices in the AA and has 29.2 percent deposit market share which ranks first among all financial institutions. Major competitors include Mechanics Bank with nine offices and 22.6 percent deposit market share, JP Morgan Chase with three offices and 10.9 percent deposit market share and Key Bank with five offices and 10.2 percent deposit market share.

Information from community contact interviews identified the following needs within the Mansfield, OH MA:

- Affordable housing
- Quality employment opportunities
- Assistance with basic life needs such as food and utilities
- Financial literacy
- General operating funds for community service organizations
- Economic development and revitalization

The Mansfield AA has more limited community development opportunities in comparison to the larger metropolitan areas in the state.

Demographic Information for Full-Scope Area: Springfield, OH MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	44	13.64	20.45	36.36	29.55	0.00
Population by Geography	138,333	10.36	16.17	41.08	32.39	0.00
Owner-Occupied Housing by Geography	38,735	4.94	12.97	44.52	37.57	0.00
Businesses by Geography	5,591	8.78	18.35	33.91	38.96	0.00
Farms by Geography	332	2.41	6.02	34.94	56.63	0.00
Family Distribution by Income Level	36,684	19.82	17.52	22.90	39.76	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	13,695	14.92	23.56	40.57	20.95	0.00
Median Family Income = 53,678 HUD Adjusted Median Family Income for 2016 = 57,100 Households Below the Poverty Level = 14%					Median Housing Value = 109,703 Unemployment Rate = 4.58%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI.

The Springfield, OH MA AA has been defined to include Clark County, Ohio in its entirety.

Based on U.S. Census Bureau data, population within the AA decreased by 2.6 percent from 2010 to 2016, which compares unfavorably to the state of Ohio, which grew by 0.7 percent.

As of June 2017 (the most recent data available from the BLS), the preliminary unemployment rate in Clark County was 5.2 percent which is similar to the statewide rate of 5.5 percent and compares unfavorably to the nationwide rate of 4.4 percent. The poverty rate is significant at 14 percent.

Economic analysis by Moody’s indicates the Springfield, OH MA is growing slowly as job creation lags both state and regional averages. The economy is not well diversified with over reliance on manufacturing, and the population is not as well educated as other nearby metropolitan areas. Demographics for future business growth are weak due to a slowly declining population. Proximity to major transportation links and a low cost of business are considered major strengths. Based on data from the BLS, key employment sectors include education and health services, government, manufacturing, and retail trade. Major employers include Springfield Regional Hospital, Assurant Specialty Property, International Truck and Engine, Speedway, Super America and Navistar.

Data from the 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units was \$103,600 in the AA. Based on the FHFA HPI calculator, housing values increased approximately 11 percent over the evaluation period in the Springfield, OH MA. Based on the 2016 median family income of \$57,100, low-income families make less than \$28,550 and moderate-income families make less than \$45,680. Median housing values are 3.6 times the annual income of low-income families, thus a

homeownership affordability issue exists for low-income families. The housing costs relative to income have a limiting effect on mortgage demand among low-income families. No such limiting effect is noted for moderate-income families.

We note that the percent of families who reside in low-income geographies is far higher than the percent of owner-occupied housing units in those low-income geographies. For instance in 2016, 14.9 percent of families resided in low-income geographies while only 4.9 percent of owner-occupied housing units are located in those geographies.

According to the 2010 U.S. Census, the median age of housing stock in low-income geographies is 72 years. This is compared to 55 years for the Springfield AA in its entirety. Older housing often costs more to maintain and frequently requires significant repairs to bring the dwelling up to current code requirements. Older homes are typically less energy efficient and often result in higher heating and cooling costs which add to the overall costs of homeownership. The increased energy costs and additional expenses related to rehabilitation can limit the ability of low-income families to qualify for a home purchase, in particular a house requiring rehabilitation.

Overall, opportunities for home mortgage lending in low-income geographies and to low-income families are limited due to: median values of existing homes relative to the income of low-income families; a limited inventory of owner-occupied units; significant poverty rates, and the associated costs of buying, rehabilitating, and maintaining a house of average age in low-income geographies.

Given the estimated 2016 population of the AA is just 138,000, competition is significant with 12 other FDIC-insured depository institutions operating 37 offices. Park operates 11 offices in the AA and has 32.4 percent deposit market share which ranks first among all financial institutions. Major competitors include Huntington National Bank with three offices and 17 percent deposit market share, PNC Bank with six offices and 16.9 percent deposit market share and Home City Federal Savings Bank with two offices and 7.6 percent deposit market share.

Information from community contact interviews identified the following needs within the Mansfield, OH MA:

- Affordable housing
- Quality employment opportunities
- Assistance with basic life needs such as food and utilities
- Financial literacy
- General operating funds for community service organizations
- Economic development and revitalization

The Springfield AA has more limited community development opportunities in comparison to larger metropolitan areas in the state.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Evaluation). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also

presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - 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 market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans** - 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 MA/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Home Mortgage Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that

amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016)	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope Review:												
Columbus MA	30.13	3,945	496,933	2,132	324,365	209	22,680	32	17,668	6,286	843,978	39.13
Mansfield MA	7.39	840	76,191	658	94,337	44	2,301	0	0	1,542	172,829	9.24
Springfield MA	7.43	501	34,511	827	101,039	223	37,504	6	873	1,551	173,054	8.36
Limited-Scope Review:												
Cincinnati MA	5.82	868	156,556	343	87,981	3	896	2	880	1,214	245,433	4.20
Dayton MA	6.21	506	60,885	685	97,285	104	9,854	4	898	1,295	168,024	5.89
Ohio Non-MA	43.02	4,691	502,872	3,130	382,523	1,157	122,769	13	7,223	8,978	1,008,164	33.18
Broader Statewide Area - No Purpose/Mandate/Function												
State of Ohio no P/M/F	NA	NA	NA	NA	NA	NA	NA	10	17,291	NA	NA	NA
Broader Regional Area – No Purpose/Mandate/Function												
Appalachia Region no P/M/F	NA	NA	NA	NA	NA	NA	NA	2	8,069	NA	NA	NA

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OHIO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Columbus MA	1,927	34.14	5.57	2.65	21.85	27.30	39.71	51.32	32.87	18.73	2.17	2.38	3.20	2.89	1.04
Mansfield MA	404	7.16	0.00	0.00	20.04	11.63	49.63	54.70	30.33	33.67	11.63	0.00	14.05	11.49	11.20
Springfield MA	198	3.51	4.94	2.53	12.97	14.65	44.52	53.03	37.57	29.79	3.92	7.50	3.24	4.29	3.48
Limited-Scope Review:															
Cincinnati MA	513	9.09	3.10	2.92	15.79	10.72	44.12	52.24	36.99	34.10	0.64	0.74	0.51	0.79	0.51
Dayton MA	260	4.61	4.44	0.77	18.39	16.92	44.16	65.38	33.01	16.93	0.77	0.00	0.83	1.25	0.26
Ohio Non-MA	2,342	41.49	0.66	0.77	13.59	15.67	68.59	68.49	17.16	15.07	9.13	12.82	12.79	9.36	6.15

* Based on 2015 Peer Mortgage Data -- US and PR.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one- to four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full-Scope Review:																				
Columbus MA	802	35.39	5.57	1.00	21.85	29.93	39.71	56.98	32.87	12.09	12.68	3.45	18.30	17.56	4.84					
Mansfield MA	176	7.77	0.00	0.00	20.04	14.20	49.63	51.14	30.33	34.66	27.88	0.00	38.46	27.68	25.00					
Springfield MA	177	7.81	4.94	7.34	12.97	9.04	44.52	53.67	37.57	29.95	28.94	58.33	29.17	34.29	19.15					
Limited-Scope Review:																				
Cincinnati MA	96	4.24	3.10	1.04	15.79	10.42	44.12	60.42	36.99	28.12	1.58	2.33	0.69	2.37	1.03					
Dayton MA	82	3.62	4.44	0.00	18.39	17.07	44.16	67.07	33.01	15.86	3.80	0.00	5.93	5.20	1.55					
Ohio Non-MA	933	41.17	0.66	0.32	13.59	12.75	68.59	72.67	17.16	14.26	32.78	33.33	34.78	33.10	29.70					

* Based on 2015 Peer Mortgage Data -- US and PR.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one- to four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: OHIO					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp				
Full-Scope Review:																					
Columbus MA	1,195	35.30	5.57	1.34	21.85	25.86	39.71	54.48	32.87	18.32	2.28	0.87	4.02	3.03	1.09						
Mansfield MA	254	7.50	0.00	0.00	20.04	12.20	49.63	49.21	30.34	38.58	8.56	0.00	7.06	8.25	9.35						
Springfield MA	126	3.72	4.94	3.97	12.97	14.29	44.52	43.65	37.57	38.09	3.91	6.45	6.48	3.41	3.78						
Limited-Scope Review:																					
Cincinnati MA	243	7.18	3.10	1.65	15.79	6.58	44.12	55.56	36.99	36.21	0.46	0.29	0.25	0.62	0.38						
Dayton MA	158	4.67	4.44	0.00	18.39	13.92	44.16	66.46	33.01	19.62	0.59	0.00	0.70	0.81	0.35						
Ohio Non-MA	1,409	41.63	0.66	0.64	13.59	12.21	68.59	75.16	17.16	11.99	9.33	16.00	10.50	10.42	4.84						

* Based on 2015 Peer Mortgage Data -- US and PR.

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one- to four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: OHIO									Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Columbus MA	21	37.50	22.94	28.57	28.28	28.57	31.47	33.33	17.31	9.53	1.91	0.00	0.00	5.33	0.00
Mansfield MA	6	10.71	0.00	0.00	45.41	33.33	40.13	33.33	14.46	33.34	0.00	0.00	0.00	0.00	0.00
Springfield MA	0	0.00	18.92	0.00	15.56	0.00	45.05	0.00	20.47	0.00	0.00	0.00	0.00	0.00	0.00
Limited-Scope Review:															
Cincinnati MA	16	28.57	16.10	18.75	30.03	50.00	37.12	25.00	16.75	6.25	1.28	3.23	1.14	1.14	0.00
Dayton MA	6	10.71	10.65	16.67	27.74	16.67	41.68	50.00	19.93	16.66	2.33	0.00	0.00	5.26	0.00
Ohio Non MA	7	12.51	6.09	0.00	23.73	57.14	52.42	42.86	17.76	0.00	3.13	0.00	16.67	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR.

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: OHIO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total**	% of Business- ses***	% BANK Loans	% of Business- ses***	% BANK Loans	% of Business- ses***	% BANK Loans	% of Business- ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Columbus MA	2,132	27.42	9.38	10.93	22.13	23.26	33.64	44.23	34.85	21.58	2.95	4.05	2.59	4.26	1.88
Mansfield MA	658	8.46	0.00	0.00	28.27	37.08	45.12	41.49	26.61	21.43	15.43	0.00	19.85	15.88	11.68
Springfield MA	827	10.64	8.78	8.10	18.35	18.26	33.91	28.90	38.96	44.74	16.83	21.57	20.75	14.51	17.09
Limited-Scope Review:															
Cincinnati MA	343	4.41	6.51	4.37	20.66	17.49	37.50	46.06	35.33	32.08	0.45	0.38	0.53	0.54	0.36
Dayton MA	685	8.81	6.90	1.75	18.35	18.83	41.92	55.33	32.83	24.09	2.25	0.75	2.21	3.12	1.61
Ohio Non-MA	3,130	40.26	1.46	1.05	17.65	16.96	64.90	70.13	15.99	11.86	12.15	12.39	14.48	12.84	9.49

* Based on 2015 Peer Small Business Data -- US and PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OHIO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Columbus MA	209	12.01	4.29	0.00	17.72	23.92	51.37	69.38	26.62	6.70	22.11	0.00	44.74	21.43	8.00
Mansfield MA	44	2.53	0.00	0.00	5.60	0.00	62.24	84.09	32.16	15.91	28.57	0.00	0.00	33.33	15.38
Springfield MA	223	12.82	2.41	0.00	6.02	1.79	34.94	23.77	56.63	74.44	57.63	0.00	0.00	57.14	58.54
Limited-Scope Review:															
Cincinnati MA	3	0.17	2.98	0.00	12.23	0.00	51.24	100.00	33.55	0.00	0.85	0.00	0.00	1.47	0.00
Dayton MA	104	5.98	2.45	0.00	11.24	5.77	53.77	67.31	32.54	26.92	17.39	0.00	27.27	19.20	13.04
Ohio Non MA	1,157	66.49	0.10	0.00	4.32	1.73	72.04	73.64	23.54	24.63	40.37	0.00	29.41	39.69	43.80

* Based on 2015 Peer Small Business Data -- US and PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: OHIO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Columbus MA	1,927	34.14	23.08	14.30	18.14	25.51	21.20	24.89	37.58	35.30	2.46	3.00	2.49	2.44	2.27
Mansfield MA	404	7.16	18.37	8.53	20.51	23.47	21.55	29.07	39.57	38.93	12.58	16.67	12.36	12.63	11.97
Springfield MA	198	3.51	19.82	13.64	17.52	29.87	22.90	19.48	39.76	37.01	3.85	5.04	3.41	2.93	4.62
Limited-Scope Review:															
Cincinnati MA	513	9.09	20.82	8.37	16.86	20.82	20.55	19.53	41.77	51.28	0.70	0.38	0.67	0.67	0.85
Dayton MA	260	4.61	20.98	16.74	18.16	22.91	20.62	18.94	40.24	41.41	0.76	1.16	0.86	0.70	0.65
Ohio Non MSA 2015	2,342	41.49	18.78	8.31	18.63	24.71	22.41	24.29	40.18	42.69	10.24	10.22	9.32	9.60	11.54

* Based on 2015 Peer Mortgage Data -- US and PR.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 9.4% of loans originated and purchased by bank.

¹ Data shown includes only one- to four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: OHIO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ²	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Columbus MA	802	35.39	23.08	19.78	18.14	26.29	21.20	20.87	37.58	33.06	12.48	19.54	15.56	11.90	9.32
Mansfield MA	176	7.77	18.37	12.12	20.51	21.82	21.55	30.30	39.57	35.76	27.65	27.27	37.21	27.94	22.62
Springfield MA	177	7.81	19.82	14.72	17.52	26.99	22.90	29.45	39.76	28.84	27.48	44.83	19.61	35.56	22.68
Limited-Scope Review:															
Cincinnati MA	96	4.24	20.82	16.47	16.86	21.18	20.55	20.00	41.77	42.35	1.47	2.04	1.82	1.63	1.10
Dayton MA	82	3.62	20.98	14.86	18.16	28.38	20.62	40.54	40.24	16.22	3.49	3.49	5.97	5.88	1.47
Ohio Non-MA	933	41.17	18.78	10.54	18.63	25.62	22.41	24.60	40.18	39.24	32.16	44.23	39.07	30.33	26.49

* Based on 2015 Peer Mortgage Data -- US and PR.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 7% of loans originated and purchased by bank.

² Data shown includes only one- to four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
Full-Scope Review:																
Columbus MA	1,195	35.30	23.08	13.92	18.14	22.93	21.20	25.93	37.58	37.22	2.79	4.46	3.70	2.83	2.09	
Mansfield MA	254	7.50	18.37	8.79	20.51	20.50	21.55	23.85	39.57	46.86	9.62	10.20	9.82	7.45	10.76	
Springfield MA	126	3.72	19.82	9.52	17.52	20.95	22.90	30.48	39.76	39.05	4.38	6.94	4.62	4.76	3.77	
Limited-Scope Review:																
Cincinnati MA	243	7.18	20.82	12.12	16.86	13.85	20.55	26.84	41.77	47.19	0.56	0.88	0.39	0.68	0.51	
Dayton MA	158	4.67	20.98	11.03	18.16	19.31	20.62	22.07	40.24	47.59	0.77	1.06	0.59	0.75	0.80	
Ohio Non MA	1,409	41.63	18.78	9.50	18.63	20.18	22.41	26.11	40.18	44.21	10.90	12.78	10.56	10.34	11.07	

* Based on 2015 Peer Mortgage Data -- US and PR.

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 6.4% of loans originated and purchased by bank.

³ Data shown includes only one- to four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: OHIO		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016		
Assessment Area	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full-Scope Review:									
Columbus MA	2,132	27.42	82.09	55.44	63.56	19.09	17.35	2.95	4.42
Mansfield MA	658	8.46	77.75	54.41	64.44	18.09	17.47	15.43	20.39
Springfield MA	827	10.64	78.21	56.11	66.26	20.31	13.43	16.83	20.44
Limited-Scope Review:									
Cincinnati MA	343	4.41	80.29	64.72	39.07	27.11	33.82	0.45	0.62
Dayton MA	685	8.81	79.87	53.28	62.77	22.34	14.89	2.25	2.82
Ohio Non-MA	3,130	40.26	79.68	62.24	70.19	17.06	12.75	12.15	17.70

* Based on 2015 Peer Small Business Data -- US and PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 8.7% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: OHIO			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016		
Assessment Area	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less	
Full-Scope Review:										
Columbus MA	209	12.01	95.41	88.04	67.94	17.22	14.84	22.11	40.85	
Mansfield MA	44	2.53	97.64	95.45	86.36	11.36	2.28	28.57	50.00	
Springfield MA	223	12.82	97.89	79.37	46.64	27.35	26.01	57.63	72.86	
Limited-Scope Review:										
Cincinnati MA	3	0.17	96.25	66.67	0.00	66.67	33.33	0.85	1.43	
Dayton MA	104	5.98	96.23	80.77	70.19	20.19	9.62	17.39	24.55	
Ohio Non MSA 2015	1,157	66.49	98.14	83.32	67.68	21.00	11.32	40.37	57.68	

* Based on 2015 Peer Small Business Data -- US and PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 5.3% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OHIO			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full-Scope Review:									
Columbus MA	0	0	66	298	66	298	0.58	0	0
Mansfield MA	0	0	0	0	0	0	0.00	0	0
Springfield MA	0	0	23	109	23	109	0.21	0	0
Limited-Scope Review:									
Cincinnati MA	0	0	14	43	14	43	0.08	0	0
Dayton	0	0	5	5	5	5	0.01	0	0
Ohio Non MSA 2015	0	0	17	44	17	44	0.09	0	0
Broader Statewide Region – with purchase/mandate/function									
State of Ohio	15	25,259	3	26,000	18	51,259	99.03	0	0

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		Geography: OHIO		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
MA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population									
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
Full-Scope Review:																							
Columbus MA	39.13	30	27.27	3.33	36.67	43.33	16.67	3	7	0	-2	0	-2	11.42	24.06	36.34	28.18						
Mansfield MA	9.24	12	10.91	0.00	41.67	41.67	16.66	0	1	0	0	-1	0	0.00	27.88	45.91	26.21						
Springfield MA	8.36	11	10.00	9.09	9.09	72.73	9.09	0	0	0	0	0	0	10.36	16.17	41.08	32.39						
Limited-Scope Review:																							
Cincinnati MA	4.20	9	8.18	0.00	11.11	66.67	22.22	1	2	0	0	-1	0	7.33	19.82	40.28	32.57						
Dayton MA	5.89	7	6.36	0.00	42.86	57.14	0.00	0	2	0	0	-2	0	7.08	22.23	42.05	28.64						
Ohio Non-MA	33.18	41	37.27	0.00	29.27	60.98	9.75	2	4	0	+1	-3	0	2.50	15.69	65.58	16.23						