



PUBLIC DISCLOSURE

July 27, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

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, OH 43017

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, and should not be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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Overall CRA Rating

Bank’s CRA Rating: This bank is rated Satisfactory.

The following table indicates the performance level of Park National Bank with respect to the Lending, Investment, and Service Tests:

Performance Levels	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:

- The substantive majority of loans are inside one of the bank’s assessment areas (AAs).
- Overall lending activity levels reflect good responsiveness to AA credit needs.
- The geographic distribution of loans in Ohio is good.
- The borrower distribution of loans in Ohio is good.
- Impactful community development loans were noted in the Ohio non-MSA AA.
- The Investment Test rating is based on outstanding performance in Ohio.
- The Service Test rating is based on good retail service in Ohio and a good level of community development services in Ohio.

Lending in Assessment Area

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

The bank originated and purchased 91.3 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area											
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)	
	Inside		Outside			Inside		Outside			
	#	%	#	%		\$	%	\$	%		
Home Mortgage	12,363	91.9	1,083	8.1	13,446	1,544,355	85.8	255,943	14.2	1,800,298	
Small Business	5,094	90.9	512	9.1	5,606	757,391	88.1	102,219	11.9	859,610	
Small Farm	889	85.5	151	14.5	1,040	97,468	83.7	19,007	16.3	116,475	
Total	18,346	91.3	1,746	8.7	20,092	2,399,214	86.4	377,168	13.6	2,776,383	

Description of Bank

Park National Bank (Park, or bank) is a \$8.5 billion multi-state bank headquartered in Newark, Ohio. Park is a subsidiary of Park National Corporation, an \$8.7 billion one-bank holding company headquartered in Newark, Ohio. Other holding company assets are associated with asset management services and a small finance company. Affiliate data was not considered in this evaluation. The bank consists of 12 community bank divisions and one affiliated consumer finance division.

Effective July 1, 2018, Park acquired New Dominion Bank headquartered in Charlotte, North Carolina. This acquisition resulted in the creation of a new, two-county AA in the Charlotte MSA. Effective April 1, 2019, Park acquired Carolina Alliance Bank, headquartered in Spartanburg, South Carolina. Carolina Alliance Bank maintained offices in both South Carolina and North Carolina. The acquisition resulted in the creation of two new AAs in South Carolina (Spartanburg MSA and Greenville MSA) and one new AA in North Carolina (Asheville MSA). Due to the timing of these acquisitions, the OCC limited the evaluation of CRA performance in these states to 2019.

The bank also converted a loan production office in Louisville KY into a full-service branch, effective June 24, 2019. Due to the small amount of deposits attributed to this full-service branch, and the corresponding small weight that would be given to this AA, it was removed from the scope of the current evaluation.

As of December 31, 2019, net loans and leases represented 64.1 percent of total assets. By dollar volume, the \$5.5 billion loan portfolio is 36.7 percent residential real estate, 52.1 percent commercial and industrial (including commercial real estate), 7.6 percent consumer loans, and 3.6 percent agriculture. Tier 1 capital totaled \$731 million.

As of December 31, 2019, the bank maintained 117 full-service branches, 94 deposit-taking ATMs and 43 limited-service ATMs. With the acquisitions of New Dominion Bank and Carolina Alliance Bank, Park has three rating areas: Ohio, North Carolina, and South Carolina. The bank has six AAs in Ohio, two AAs in North Carolina, and two AAs in South Carolina. For analysis purposes, the OCC combined the bank's many rural locations in Ohio into one Non-MSA AA.

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, Veteran's Affairs, and first-time homebuyer mortgage products.

The bank offers a full range of traditional depository accounts and services through its retail branches. The bank also offers alternative banking products and services, such as online banking, mobile banking, electronic 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. The bank received a "Satisfactory" rating at the prior CRA evaluation dated August 14, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period was January 1, 2017, through December 31, 2019. Products reviewed include HMDA-reportable home mortgage loans and CRA-reportable small business and small farm loans.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is a blend of the state ratings and multistate ratings when applicable.

The state of Ohio was given the largest weight when considering the bank's overall rating. Despite recent acquisitions, over ninety percent of operations remain in Ohio.

When evaluating performance based on demographic comparators for lending, the OCC placed equal emphasis on borrower income and geography income. The OCC also placed equal emphasis when comparing demographic performance to the performance of other reporting lenders (the "aggregate") in the AAs.

When there were differences in performance between loan products, the OCC emphasized the products based on the loan mix by number of loans made in the AA over the evaluation period in determining an overall conclusion. In most cases, this resulted in greater emphasis on mortgage lending. Due to the relatively low amount of farm lending, little weight was provided to that product.

The state ratings are based on performance in all AAs in the state. Refer to the "Scope" section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this bank (or any affiliate whose loans have been considered as part of the bank's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of North Carolina

CRA rating for the State of North Carolina): Needs to Improve

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- The bank exhibits a poor distribution of loans among individuals of different income levels and business and farms of different sizes.
- Lending activity levels reflect adequate responsiveness to AA credit needs.
- The bank exhibits an adequate geographic distribution of loans in the AAs.
- The bank has an adequate level of qualified community development (CD) investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.
- The bank provides few CD services.

Description of Bank's Operations in North Carolina

Park entered this state during the current review period by way of its acquisitions of New Dominion Bank on July 1, 2018, and Carolina Alliance Bank on April 1, 2019. The New Dominion acquisition was in the Charlotte area and the description below relates only to the Charlotte-Concord-Gastonia MSA AA (Charlotte AA), which was selected for full-scope review.

The Charlotte AA includes all of Mecklenburg and Iredell Counties in North Carolina. As of the 2015 American Community Survey (ACS) conducted by the U.S. Census Bureau, the population in this AA was 1,155,354, with 279,774 families, 482,502 housing units, and 117,724 businesses. The area is growing rapidly. The U.S. Census estimates the population at July 1, 2019 to be 1,292,162, an increase of 11.8 percent from 2015.

According to the 2015 ACS, 54.4 percent of the housing units were owner occupied, 36.9 percent were renter occupied and 8.7 percent were vacant. Further, 80.1 percent of owner-occupied housing units were located in middle-or upper-income census tracts (CTs), despite only 69.7 percent of total housing units being located in middle-or upper-income CTs. In addition, 43.9 percent of rental units were located in low-or moderate-income CTs despite only 30.2 percent of total housing units being located in either the low-or moderate-income CTs. Therefore, the number of owner-occupied housing units were skewed toward middle-and upper-income CTs, which in turn impacts opportunities for mortgage lending, with more opportunities in middle-and upper-income areas and fewer in low-and moderate-income areas.

Park has only two deposit taking offices in the Charlotte AA. One office in Mecklenburg County and one in Iredell County. Banking competition is significant within the AA, with 29 deposit-taking banks present operating 273 offices. Competition from large banks is substantial, with Bank of America, Wells Fargo, Branch Banking and Trust Company, Fifth Third Bank, and First Citizens Bank & Trust being the top five in deposit market share. Many out of area banks, mortgage companies, and credit

unions are active in the mortgage lending market. For 2019, the top two mortgage market share leaders were Wells Fargo and Bank of America. Number three through five were all non-banks. Small business market share data for 2019 was not yet available for analysis.

The unemployment figures for Mecklenburg and Iredell Counties are comparable to the North Carolina statewide figures. Per the Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate for Mecklenburg and Iredell Counties was 3.1 and 3.2 percent, respectively, while the statewide rate was 3.3 percent. While the unemployment rates were low, the poverty rate was significant at 11.4 percent.

The median housing value in the Charlotte AA was \$206,955, while the median family income was \$64,187; meaning low-income families made less than \$32,093 and moderate-income families made less than \$51,350. Therefore, median housing values were at least 6.4 and 4.0 times the annual incomes of low-and moderate-income families, respectively. These metrics are reflective of an obstacle to homeownership for low-and moderate-income families, which reduces opportunities for responsible mortgage lending.

Further, the OCC notes that most of the low-or moderate-income CTs are in Mecklenburg County, which is the core urban count of the MSA. The lone office cannot be reasonably expected to lend in all low-or moderate-income CTs.

The OCC also reviewed the information provided from recent interviews with representatives from two affordable housing organizations and one economic development organization serving the Charlotte AA. The contacts mentioned needs for affordable housing, micro small business loans, financial literacy, and operating funds for affordable housing organizations.

Table A – Demographic Information						
Metropolitan Statistical Area: Charlotte MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	277	11.6	20.6	26.4	40.1	1.4
Population by Geography	1,155,354	10.0	20.3	27.1	42.1	0.5
Housing Units by Geography	482,502	10.0	20.2	27.3	42.4	0.1
Owner-Occupied Units by Geography	262,701	4.2	15.6	29.2	50.9	0.0
Occupied Rental Units by Geography	177,978	17.5	26.4	24.5	31.4	0.2
Vacant Units by Geography	41,823	15.1	22.3	26.8	35.5	0.3
Businesses by Geography	117,724	8.1	15.4	23.4	52.0	1.1
Farms by Geography	2,148	6.5	16.2	33.5	43.3	0.5
Family Distribution by Income Level	279,774	22.1	15.5	17.6	44.8	0.0
Household Distribution by Income Level	440,679	22.1	15.9	17.1	44.9	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$64,187	Median Housing Value			\$206,955
			Median Gross Rent			\$948
			Families Below Poverty Level			11.4%
<i>"Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification."</i>						

Scope of Evaluation in North Carolina

The OCC completed a full-scope review of the Charlotte AA. Due to the timing of Park's entry into the state, the OCC only considered 2019 activity. The OCC selected the full-scope area based on Park's deposits, branches, home mortgage loans, and small loans to businesses in the state of North Carolina. When combined, the Charlotte AA in North Carolina accounts for 64 percent of deposits, 50 percent of branches, 81 percent of home mortgage loans and 100 percent of small loans to businesses. Therefore, performance in the Charlotte AA was given greater weight than performance in the Asheville AA.

Due to the limited branch network in the state, the OCC gave greater weight on community development service performance than was given to Ohio for the service test analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in North Carolina is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Charlotte AA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Asheville	31	0	0	0	31	13.4	35.9
Charlotte	132	67	0	2	201	86.6	64.1

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Asheville	12,015	0	0	0	12,015	14.8	35.9
Charlotte	52,079	17,120	0	175	69,374	85.2	64.1

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank's overall lending activity in the Charlotte AA 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 with a well-established local presence. Well known national mortgage companies are also active in the Charlotte AA.

The OCC considered the low cost of entry into the loan origination market which increases competition with non-banks, as compared to the high cost of entry into the traditional deposit gathering market. Park gathers deposits primarily through traditional branch offices.

Park's lending activity reflects adequate responsiveness to area credit needs in the Charlotte AA when considering the bank's deposits, branch network, and limited time in the market. Park ranks 15th out of 29 depository banks with a deposit market share of 0.1 percent. For HMDA loans, Park's market share of 0.2 percent ranks 76th out of 676 lenders. Market share data for small loans to businesses was not available for analysis. Park did not originate small loans to farms in this rating area.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

Park's geographic distribution of home mortgage loans in the Charlotte AA is poor. The percentage of loans originated in both low-and moderate-income geographies is well below both the percentage of owner-occupied housing units and the percentage of aggregate lending. The OCC also considered Park's new and limited physical presence in the AA, particularly in Mecklenberg County, where the majority of low-and moderate-income geographies are located.

Small Loans to Businesses

Refer to Table Q in the North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Park's geographic distribution of small loans to businesses in the Charlotte AA is excellent.

The percentage of small loans to businesses in both low-and moderate-income geographies exceeds the percent of businesses present and the aggregate lending in those geographies.

Small Loans to Farms

The bank originated an insufficient volume of farm loans for meaningful analysis.

Lending Gap Analysis

A meaningful gap analysis could not be conducted.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

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

Park's borrower distribution of home mortgage loans in the Charlotte AA is poor. The percentage of loans to both low-and moderate-income borrowers is well below both the percentage of low-and moderate-income families. Further, the percentage of loans to both low-and moderate-income borrowers is well below the percentage of aggregate lending to those families.

The OCC considered the median price of housing in the AA relative to the maximum income of borrowers in both the low-and moderate-income categories, which demonstrates a significant barrier to homeownership for these families. The OCC also considered the brief length of time the bank has been in the Charlotte AA and the strong level of competition.

Small Loans to Businesses

Refer to Table R in the North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses in the Charlotte AA is adequate. The percentage of loans to businesses originated or purchased is well below the percentage of small businesses in the AA but is near the aggregate percentage of all reporting lenders. The OCC considered the brief length of time Park has been in the market in its analysis.

Small Loans to Farms

The bank originated an insufficient volume of farm loans for meaningful analysis.

Community Development Lending

The bank made a low level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

In the Charlotte AA, the bank made two non-real estate secured loans to non-profits during the review period to provide working capital. One non-profit is involved in low-and moderate-income student education, while the other provides support to women overcoming addiction, drug abuse, and domestic violence. The loans equated to 0.8 percent of tier one capital.

Product Innovation and Flexibility

The bank makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Area Receiving a Limited-Scope Review

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

Refer to Tables O through R of appendix D for the facts and data that support these conclusions.

In the Asheville AA, the home lending geographic distribution is better than the geographic distribution in the Charlotte AA. There were no community development loans in the Asheville AA

INVESTMENT TEST

The bank's performance under the Investment Test in North Carolina is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Charlotte AA is adequate.

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits poor responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Asheville	0	0	3	486	3	30.0	486	22.1	0	0
Charlotte	0	0	7	1,718	7	70.0	1,718	77.9	0	0

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

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

The bank's investments in the Charlotte AA are primarily qualified mortgage-backed securities (MBS), where the majority of the underlying loans are to low-or moderate-income borrowers. The quantity of MBS is good when compared to tier 1 capital allocated to the state based on the percent of bank deposits in the state. However, there were minimal grants or other investments present that may have been more responsive to community needs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Asheville AA is weaker than the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in North Carolina is rated Needs to Improve.

Based on a full-scope review, the bank's performance in the Charlotte AA is poor.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA(s).

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Asheville	35.9	2	50.0	0	1	0	1	1.9	12.0	63.4	22.7
Charlotte	64.1	2	50.0	0	0	0	2	10.0	20.3	27.1	42.1

In addition to the deposit-taking branches noted in the table above, the bank maintains a loan production office in the Charlotte AA, which is located in an upper-income geography.

The bank did not open or close any branches during the evaluation period.

Services offered, including business hours, vary in a way that inconveniences portions of the Charlotte AA, particularly low-and moderate-income geographies. Neither office is located in or near a low-or moderate-income geography. Further, the OCC noted only one of the two offices has either an ATM or a drive-thru, and no evening or weekend hours are offered. The OCC considered Park's recent entry into the Charlotte AA and the limited number offices acquired in the acquisition in the analysis.

Park provides traditional products and services through its retail branch network, which do not vary materially between offices in the Charlotte AA. Examples of deposit products include checking, savings, certificates of deposit, health savings, and individual retirement accounts; trust services; and investment services. Deposit accounts can be opened with varying opening deposit and minimum balance requirements in order to match individual customer needs, including customers of low-and moderate-income. Examples of other services offered include official checks, money orders, wire transfers, safe deposit boxes, debit cards, and direct deposit.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. However, metrics are not maintained to measure effectiveness at reaching low-or moderate-income residents.

Community Development Services

The bank has a low level of CD services in the Charlotte AA.

The OCC evaluated Park's performance for the 2019 calendar year. During the evaluation period, Park employees provided a limited amount of financial literacy training to students and low-and moderate-income communities.

In the Charlotte AA, three employees provided their expertise to three different community development organizations. Those organizations provide financial literacy to students in schools where many students participate in free or reduced-price school lunch programs. However, bank personnel did not participate in a leadership role with any qualifying community service, affordable housing, or economic development organizations. Further, the number of CD services was insufficient to compensate for the lack of retail presence in either low-or moderate-income geographies.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Asheville AA is stronger than the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of Ohio

CRA rating for the State of Ohio: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The geographic distribution of loans in the AAs is adequate.
- The bank maintains a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.
- The bank maintains an adequate level of CD loans in the Columbus AA and an excellent level of CD loans in the Ohio non-MSA AA.
- In the Columbus AA, the bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.
- In the Columbus AA, the bank exhibits excellent responsiveness to credit and community economic development needs.
- The bank's extensive use of innovative or complex investments to support CD initiatives.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- Park's performance in providing CD services in the both the Columbus and Ohio non-MSA AAs is good.

Description of Bank's Operations in Ohio

Columbus AA

The Columbus AA includes all of Fairfield, Franklin, Hocking, Licking, Madison, Morrow, and Perry Counties in Ohio. As of the 2015 ACS conducted by the U.S. Census Bureau, the population in this AA was 1,676,957, with 402,584 families, 724,505 housing units, and 121,113 businesses. The area is growing. The U.S. Census estimates the population at July 1, 2019 to be 1,795,649, an increase of 7.1 percent from 2015.

According to the 2015 ACS, 52.9 percent of the housing units were owner occupied, 37.2 percent were renter occupied, and 9.9 percent were vacant. Further, 72.7 percent of owner-occupied housing units were located in middle-or upper-income CTs, despite only 61.1 percent of total housing units being located in middle-or upper-income CTs. In addition, 50.0 percent of rental units were located in low-or moderate-income CTs, despite only 38.7 percent of total housing units being located in either the low-or moderate-income CTs. Therefore, the number of owner-occupied housing units are skewed toward middle-and upper-income CTs, which in turn impacts opportunities for mortgage lending with more opportunities in middle-and upper-income areas, and fewer in low-and moderate-income areas.

As of December 31, 2019, Park has 29 deposit taking offices in the Columbus AA. Thirteen offices are in the bank's historic home, Licking County. Banking competition is significant in the AA, with 50

deposit-taking banks present. At June 30, 2019, Federal Deposit Insurance Corporation FDIC market share reports indicate Park ranked 5th of the 50 banks in the AA with 4.2 percent of deposits. Competition from large banks is substantial with Huntington Bank, JPMorgan Chase, PNC Bank, and Fifth Third Bank being the top four in deposit market share.

Many large banks are active in the mortgage lending market. For 2019, the top five mortgage market share leaders were all banks. First through fifth in mortgage market share were: Huntington Bank, JPMorgan Chase, US Bank, Wells Fargo, and Union Savings Bank.

Top lenders to businesses are also dominated by banks, some of which are credit card banks with low average dollar amount loans. For 2018, the most recent year available, the top five business lenders were: Chase Bank USA, American Express, PNC Bank, Huntington Bank, and US Bank. The OCC notes that Park's average loan amount was far greater than many of the bank's with higher per unit market share, suggesting those banks are primarily engaged in credit card lending within the AA. Credit Card lending to businesses is generally considered less impactful than other more complex business lending. Similarly, top lenders to farms are dominated by banks, the top three of which were primarily engaged in credit card lending. For 2018, the top three farm lenders were: John Deere Financial, Chase Bank USA, and US Bank.

The unemployment rate during the review period was low. The OCC analyzed figures for the entire Columbus MSA, which ranged from a high of 5.0 percent during January 2017 to a low of 3.2 percent during December 2019. The statewide figure during the evaluation period tended to be slightly higher, ranging from 6.8 to 3.8 percent. While the unemployment rates were low, the poverty rate was significant, at 11.6 percent.

The median housing value in the Columbus AA was \$150,858, while the median family income was \$70,454, meaning low-income families made less than \$35,227. Therefore, median housing values were at least 4.3 times the annual incomes of low-income families. This metric is reflective of an obstacle to homeownership for low-income families and reduces opportunities for responsible mortgage lending.

Further, the OCC notes that most of the low-income CTs are in Franklin County, which is the core urban count of the Columbus MSA. Park has a small presence in Franklin County when compared to its large bank competitors.

The OCC also reviewed the information provided from recent interviews with representatives from two affordable housing organizations serving the Columbus area. The contacts mentioned needs for affordable housing, operating funds, board memberships, low-cost banking products, home repair funds, and financial education.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Columbus MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	375	17.6	26.1	31.5	24.0	0.8
Population by Geography	1,676,957	11.8	24.5	34.7	28.2	0.8
Housing Units by Geography	724,505	13.4	25.3	34.1	27.0	0.2
Owner-Occupied Units by Geography	383,307	6.3	21.0	38.1	34.6	0.0

Occupied Rental Units by Geography	269,674	19.3	30.7	30.4	19.2	0.5
Vacant Units by Geography	71,524	29.5	28.7	26.2	15.0	0.6
Businesses by Geography	121,113	10.6	20.1	31.3	37.5	0.6
Farms by Geography	3,358	6.0	16.8	47.4	29.7	0.1
Family Distribution by Income Level	402,584	24.1	17.8	19.9	38.2	0.0
Household Distribution by Income Level	652,981	25.7	17.0	17.6	39.7	0.0
Median Family Income MSA -	\$70,454	Median Housing Value				\$150,858
		Median Gross Rent				\$836
		Families Below Poverty Level				11.6%
<i>Source: 2015 ACS Census and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Ohio Non-MSA AA

The Ohio non-MSA AA includes 14 rural Ohio counties: Ashland, Athens, Champaign, Crawford, Coshocton, Darke, Guernsey, Holmes, Knox, Marion, Mercer, Muskingum, Tuscarawas, and Wayne. As of the 2015 ACS, the population in this AA was 834,317 with 215,285 families, 351,621 housing units, and 45,765 businesses. The area's population is stable. The U.S. Census estimates the population at July 1, 2019 to be 832,497, a slight decrease of 0.2 percent from 2015.

According to the 2015 ACS, 63.3 percent of the housing units were owner occupied, 26.7 percent were renter occupied, and 10.0 percent were vacant. Further, 86.2 percent of owner-occupied housing units were located in middle-or upper-income CTs, despite only 81.0 percent of total housing units being located in middle-or upper-income CTs. Conversely, 27.0 percent of rental units were located in low-or moderate-income CTs despite only 18.3 percent of total housing units being located in either the low-or moderate-income CTs. Therefore, the number of owner-occupied housing units are skewed slightly toward middle-and upper-income CTs, which impacts opportunities for mortgage lending with more opportunities in middle-and upper-income areas, and fewer in low-and moderate-income areas.

At December 31, 2019, Park has 42 deposit taking offices in the Ohio non-MSA AA. Banking competition is significant in the AA with 62 deposit-taking banks present. Competition from large banks is significant, but not as strong as in the Columbus AA, with Huntington Bank, JPMorgan Chase, and PNC Bank being ranked second through fourth. The majority of the other banks present are community banks.

A mixture of large banks, community banks, online banks, mortgage companies and credit unions are all present in the mortgage market. For 2019, the top five mortgage market share leaders were: Huntington Bank, Park, Quicken Loans, PNC Bank, and Union Home Mortgage Company.

Top lenders to businesses are dominated by banks, some of which are credit card banks with low average dollar amount loans. For 2018, the most recent year available, the top five business lenders were: Chase Bank USA, American Express, PNC Bank, US Bank, and Synchrony Bank. The OCC notes that Park's average loan amount was far greater than many of bank's with higher per unit market share, suggesting those banks are primarily engaged in credit card lending within the AA. Credit Card lending to business is generally considered less impactful than other more complex business lending. For 2018, the top five farm lenders were: John Deere Financial, Farmer's National Bank, Park, Chase

Bank USA, and US Bank. Participants are relatively few in number with 29 farm lenders active in this market. John Deere, Chase, and US Bank are providing primarily credit card lending based on their average loan size.

The unemployment rate during the review period was low. Unemployment rates, obtained from the Bureau of Labor Statistics, trended downward during the review period for all counties in this AA. The statewide figure during the evaluation period was similar in both rate and trend to these individual counties and ranged from 6.8 to 3.8 percent. Despite relatively low unemployment rates, the poverty rate was significant, at 11.6 percent.

The median housing value in the Ohio non-MSA AA was \$116,440, while the median family income was \$55,785, meaning low-income families made less than \$27,893. Therefore, median housing values were at least 4.2 times the annual incomes of low-income families. This metric is reflective of an obstacle to homeownership for low-income families and reduces opportunities for responsible mortgage lending.

The OCC also reviewed the information provided from recent interviews with a representative from one affordable housing organizations and one community service provider serving various portions of the large Ohio non-MSA AA. The contacts mentioned needs for affordable housing, operating funds for homelessness relief, operating funds, home repair funds, financial education, and transportation assistance as current community needs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Ohio Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	200	2.5	18.0	61.0	16.5	2.0
Population by Geography	834,317	2.3	14.9	64.5	16.6	1.7
Housing Units by Geography	351,621	1.9	16.4	64.6	16.4	0.7
Owner-Occupied Units by Geography	222,500	1.0	12.7	67.7	18.5	0.1
Occupied Rental Units by Geography	93,931	3.3	23.7	57.5	13.4	2.0
Vacant Units by Geography	35,190	3.7	20.6	63.7	11.0	0.9
Businesses by Geography	45,765	1.6	15.7	64.1	17.6	1.0
Farms by Geography	4,048	0.3	4.8	69.4	25.5	0.0
Family Distribution by Income Level	215,285	20.1	18.2	22.4	39.3	0.0
Household Distribution by Income Level	316,431	23.6	16.4	18.7	41.3	0.0
Median Family Income MSA -		\$55,785	Median Housing Value			\$116,440
			Median Gross Rent			\$654
			Families Below Poverty Level			11.6%

*Source: 2015 ACS Census and 2019 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.*

Scope of Evaluation in Ohio

The OCC completed a full-scope review of the Columbus and Ohio non-MSA AAs. The OCC selected the full-scope areas based on the amount of Park's deposits, branches, home mortgage, business, and farm loans in the state of Ohio. The Columbus AA accounts for 37.6 percent of deposits, 29.6 percent of branches, 31.4 percent of home mortgage loans and 25.8 percent of small loans to businesses. The Ohio non-MSA AA accounts for 35.5 percent of deposits, 42.9 percent of branches, 43.7 percent of home mortgage loans, and 40.6 percent of small loans to businesses. Consideration of performance was also given to limited-scope areas. Performance weights applied to all AAs were determined using the factors described above.

Since overall operations are somewhat greater in the Ohio non-MSA than the Columbus AA, more weight was given to performance in the Ohio non-MSA AA as compared to Columbus.

Due to the extensive and well-established retail branch network in Ohio, the OCC gave more weight to the retail portion of the Service Test in Ohio, than was applied in either North Carolina or South Carolina.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Columbus AA is good. Based on full-scope reviews, the bank's performance in the Ohio non-MSA AA is excellent.

Lending Activity

Lending levels reflect good responsiveness to credit needs in both the Columbus and Ohio non-MSA AAs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Cincinnati	891	253	0	5	1,149	6.4%	4.6%
Columbus	3,792	1,296	127	10	5,225	29.0%	37.6%
Dayton	628	494	53	0	1,175	6.5%	5.4%
Mansfield	965	386	13	0	1,364	7.6%	8.8%
Ohio non-MSA	5,288	2,043	540	7	7,878	43.7%	35.5%
Springfield	529	555	156	1	1,241	6.9%	8.0%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Cincinnati	168,992	70,563	0	4,104	243,659	10.5%	4.6%
Columbus	516,807	228,053	14,436	6,005	765,301	32.9%	37.6%
Dayton	72,422	75,249	5,646	0	153,317	6.6%	5.4%
Mansfield	101,461	62,166	458	0	164,085	7.0%	8.8%
Ohio non-MSA	548,479	243,791	54,377	23,754	870,401	37.4%	35.5%
Springfield	49,236	60,449	22,551	400	132,636	5.7%	8.0%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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 AAs. Many competitors are national or regional banks.

The OCC 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.

Columbus AA

Park's lending activity reflects good responsiveness to area credit needs in the Columbus AA when considering the bank's deposits and competition. Park ranks fifth out of 50 depository banks with a deposit market share of 4.2 percent. For HMDA loans, Park's market share of 2.0 percent ranks 11th out of 572 lenders. For small loans to businesses, Park's market share of 1.4 percent ranks 11th out of 129 lenders. For small loans to farms, Park's market share of 12.9 percent ranks fourth out of 22 lenders. The OCC considered Park's loans to businesses to be more impactful, as many of the market leaders are credit card lenders.

Ohio non-MSA AA

Park's lending activity reflects excellent responsiveness to area credit needs in the Ohio non-MSA when considering the bank's deposits and competition. Park ranks first out of 62 depository banks with a deposit market share of 15.4 percent. For HMDA loans, Park's market share of 10.3 percent ranks second out of 411 lenders. For small loans to businesses, Park's market share of 6.2 percent ranks eighth out of 100 lenders. For small loans to farms, Park's market share of 15.0 percent ranks third out of 29 lenders. The OCC considered Park's loans to businesses to be more impactful, as many of the market leaders are credit card lenders.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in Ohio.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans in Ohio is good.

Columbus AA

The geographic distribution of home mortgage loans is excellent in the Columbus AA.

The percentage of loans originated in low-income geographies is below, and in moderate-income geographies near to, the percentage of owner-occupied housing units in these geographies.

The percentage of loans originated in low-income geographies is near to, and in moderate-income geographies exceeds, the percentage of aggregate lending in those geographies. The OCC also considered the large bank competitors with more extensive branch networks in Franklin County in its analysis, as most low-income geographies in the AA are located in Franklin County.

Ohio non-MSA AA

The geographic distribution of home mortgage loans is adequate in the Ohio non-MSA AA.

The percentage of loans originated in low-income geographies is well below, and in moderate-income geographies near to, the percentage of owner-occupied housing units in these geographies.

The percentage of loans originated in low-income geographies is below, and in moderate-income geographies near to, the percentage of aggregate lending in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses in Ohio is good.

Columbus AA

Park's geographic distribution of small loans to businesses is good in the Columbus AA.

The percentage of small loans to businesses in low-income geographies is below, and in moderate-income geographies approximate, the percentage of businesses in those geographies.

The percentage of loans originated in low-income geographies is well below, and in moderate-income geographies exceeds, the percentage of aggregate lending in those geographies. The OCC considered the propensity for low-income geographies to be in Franklin County where the number of Park branches is fewer than its larger competitors.

Ohio non-MSA

Park's geographic distribution of small loans to businesses is adequate in the Ohio non-MSA AA.

The percentage of small loans to businesses in low-income geographies is substantively below low-and moderate-income geographies and was well below the percentage of businesses in those geographies.

The percentage of loans originated in low-income geographies is substantially below, and in moderate-income geographies is well below, the percentage of aggregate lending in those geographies. The OCC considered there are only five low-income geographies in the entire 14 county AA.

Small Loans to Farms

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

The geographic distribution of small loans to farms in Ohio is poor.

Columbus AA

Park's geographic distribution of small loans to farms is poor in the Columbus AA.

The percentage of small loans to farms in both low-and moderate-income geographies is significantly below the percentage of farms in those geographies. The OCC considered the propensity for low-income geographies to be in Franklin County, where the number of Park branches is fewer than its larger competitors. There are also limited numbers of farm loan opportunities in the low-income geographies of the Columbus AA.

The percentage of loans originated in low-income geographies is well below, and in moderate-income geographies significantly below, the percentage of aggregate lending in those geographies.

Ohio non-MSA

Park's geographic distribution of small loans to farms is poor in the Ohio non-MSA AA.

The percentage of small loans to farms in both low-and moderate-income geographies is significantly below the percentage of farms in those geographies.

The percentage of loans originated in both low-and moderate-income geographies is significantly below, the percentage of aggregate lending in those geographies. The OCC considered the small number of farms in low-income geographies in the Ohio non-MSA AA.

Lending Gap Analysis

The OCC reviewed summary reports and maps and analyzed Park's home mortgage and small business lending activity over the evaluation periods to identify any unexplainable gaps in the geographic distribution of loans in the Columbus AA. The OCC did not identify any unexplainable gaps. The OCC did not complete a lending gap analysis for the Ohio non-MSA AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

The borrower distribution of home mortgage loans in Ohio is good.

Columbus AA

The borrower distribution of home mortgage loans is excellent in the Columbus AA.

The percentage of loans originated to low-income borrowers is well below, and to moderate-income borrowers exceeds, the percentage of low-or moderate-income borrowers in the AA, respectively. The OCC considered the housing affordability issue impacting low-income residents in the AA.

The percentage of loans originated to both low-and moderate-income borrowers exceeds the percentage of aggregate lending to both those low-and moderate-income borrowers. The OCC also considered the large bank competitors with greater resources for CRA community development and specialty products.

Ohio non-MSA AA

The borrower distribution of home mortgage loans is good in the Ohio non-MSA AA.

The percentage of loans originated to low-income borrowers is significantly below, and to moderate-income borrowers exceeds, the percentage of low-or moderate-income borrowers in the AA, respectively. The OCC considered the housing affordability issue impacting low-income residents in the AA.

The percentage of loans originated to both low-and moderate-income borrowers exceeds, the percentage of aggregate lending to both low-and moderate-income borrowers.

Small Loans to Businesses

Refer to Table R in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses in Ohio is excellent.

Columbus AA

Park's borrower distribution of small loans to businesses is excellent in the Columbus AA.

The percentage of small loans to businesses originated or purchased is below the percentage of small businesses in the AA but exceeds the aggregate percentage of all reporting lenders. The OCC also considered the nature of Park's business lending as compared to the credit card lenders present in this market.

Ohio non-MSA

Park's borrower distribution of small loans to businesses is excellent in the Ohio non-MSA AA.

The percentage of small loans to businesses originated or purchased is below the percentage of small businesses in the AA but exceeds the aggregate percentage of all reporting lenders. The OCC also considered the nature of Park's business lending as compared to the credit card lenders present in this market.

Small Loans to Farms

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

The borrower distribution of small loans to farms in Ohio is excellent.

Columbus AA

Park's borrower distribution of small loans to farms is excellent in the Columbus AA.

The percentage of small loans to farms originated or purchased is near to the percentage of small farms in the AA and exceeded the aggregate percentage of all reporting lenders. The OCC also considered the nature of Park's farm lending as compared to the credit card lenders present in this market.

Ohio non-MSA AA

Park's borrower distribution of small loans to farms is excellent in the Columbus AA.

The percentage of small loans to farms originated or purchased is somewhat near to the percentage of small farms in the AA and exceeds the aggregate percentage of all reporting lenders. The OCC also considered the nature of Park's farm lending as compared to the credit card lenders present in this market.

Community Development Lending

The bank made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans. CD lending had a neutral impact on the lending test in Ohio.

Columbus AA

During the evaluation period, the bank originated ten CD loans totaling \$6.0 million, or 2.5 percent of allocated tier 1 capital allocated to the Columbus AA. The bank is adequately responsive to community lending needs, with three loans for \$2.0 million in support of affordable housing, six loans for \$2.7 million in support of community services, and one loan for \$1.3 million in support of revitalization or stabilization of low-and moderate-income geographies.

Three of the six community service loans totaling \$2.4 million were to a charter school for operating funds. While in receipt of public funds, the charter school also relies on private fundraising. Ohio

Department of Education records demonstrate a substantial majority of the school's students are eligible for free or reduced-price school lunch programs. Therefore, Park's support contributes in a substantive way to the education and child development needs of vulnerable area children.

Ohio Non-MSA AA

During the evaluation period, the bank originated seven CD loans totaling \$23.8 million, or 10.3 percent of tier 1 capital allocated to the AA. The bank demonstrates excellent responsiveness to community lending needs, with four loans for \$7.7 million in support of affordable housing and three loans for \$16.1 million in support of community service organizations.

Two of the three community service loans totaling \$16.0 million were related to the construction and supplying of a new non-profit medical center in the city of Cambridge in Guernsey County. The legal entity is a 501(c)(3) organization and a Federally Qualified Health Center (FQHC). Clients are served regardless of ability to pay. A significant portion of the organization's revenue is received from Medicaid.

Product Innovation and Flexibility

Park makes extensive use of innovative and flexible lending programs. In arriving at this conclusion, the OCC considered the size and resources of Park in relation to its primary competitors in the Columbus AA.

Park introduced a loan program in 2018 that allows flexible underwriting to incentivize lending in low-income geographies throughout Ohio, including the Columbus and Ohio non-MSA AAs. To date, the program has funded twelve residential mortgage loans, all of which were to finance the purchase of owner-occupied 1-4 family properties.

Park also maintains a small dollar home improvement loan product. This product was created in response to an identified need for such financing in areas with predominantly older housing stock, though is now available more widely than the purchase money program noted above.

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

The OCC noted other Park mortgage products that allow for more flexible underwriting of conventional mortgage loans. Freddie Mac's Home Possible, the Federal Home Loan Bank of Cincinnati's Welcome Home, Fannie Mae's Home Ready, and Federal Housing Administration (FHA) mortgage products all contain features that increase home mortgage financing possibilities for families who are often low-or moderate-income.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Cincinnati, Dayton, Mansfield, and Springfield AAs is generally consistent with the bank's overall performance under the Lending Test in the full-scope areas. The OCC noted the geographic distribution of small loans to businesses in all the limited-scope areas is stronger than in the Ohio non-MSA AA and was good.

CD lending is weaker in the Dayton, Mansfield, and Springfield AAs than in either of the full-scope AAs. CD lending in the Cincinnati AA is consistent with the CD Lending observed in the Ohio non-MSA AA and is excellent.

Refer to Tables O through V in the state of Ohio section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

In the Columbus AA, the bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

In the Ohio non-MSA AA, the bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

In the Columbus AA, the bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

In the Ohio non-MSA AA, the bank exhibits good responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cincinnati	0	0	28	134	28	11.1	134	0.3	0	0
Columbus	0	0	145	741	145	57.3	741	1.5	0	0
Dayton	0	0	5	5	5	1.9	5	0.1	0	0
Mansfield	0	0	7	30	7	2.8	30	0.1	0	0
Ohio non-MSA	0	0	28	96	28	11.1	96	0.2	0	0
Springfield	0	0	21	57	21	8.3	57	0.1	0	0
Statewide with purchase, mandate or function	16	23,449	3	24,650	19	7.5	48,100	97.7	0	0

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

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

Columbus AA

The quantity of qualifying investments in the Columbus AA 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 Corporation for Housing, (OCCH), resulted in the creation or rehabilitation of 1,235 affordable housing units, all of which were located in Franklin County where the affordable housing needs are substantial as evidenced by the high poverty rate. Further, Park made 145 qualified grants to organizations that support child welfare, homeless shelters, education, mentoring, and emergency food needs of low-and moderate-income families. The responsiveness to identified investment needs is excellent, as affordable housing is an identified need and the organizations supported help alleviate pressing community needs.

Ohio Non-MSA AA

The quantity of qualifying investments in the Ohio non-MSA is good. Affordable housing needs are supported through affordable housing projects throughout the AA. During the review period, the bank's investment in the OCCH LIHTC fund resulted in the creation or rehabilitation of 430 affordable housing units, which were located throughout this large AA. Further, Park made 28 qualified grants to organizations that support child welfare, mentoring, healthcare and emergency food needs of low-and moderate-income families. The responsiveness to identified investment needs is good, as affordable housing is an identified need and the organizations supported help address community needs.

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, primarily in the state of 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 the OCCH on the number of housing projects and associated units created or rehabilitated in each of the bank's AAs. The total LIHTC investment, including affordable housing units created or rehabilitated that were outside any AA, represents 7.2 percent of tier one capital.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Mansfield AA is weaker than the bank's overall performance in the full-scope areas. In the Mansfield AA, performance is poor due to fewer qualifying grants and a lack of LIHTCs associated with housing projects in Mansfield.

In the Springfield AA, performance under the Investment Test was consistent with the bank's overall performance in the Ohio non-MSA AA full-scope area.

In the Dayton AA, performance under the Investment Test is stronger than the bank's overall performance in the Columbus AA and Ohio non-MSA full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in Ohio is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Columbus and Ohio non-MSA AAs is good.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the Columbus and Ohio non-MSA AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cincinnati	4.6	9	0.0	0.0	11.1	55.6	33.3	8.9	18.8	35.7	35.0
Columbus	37.6	29	6.9	6.9	27.6	37.9	34.5	11.8	24.5	34.7	28.2
Dayton	5.4	6	0.0	0.0	50.0	33.3	16.7	9.1	20.1	42.8	28.1
Mansfield	8.8	11	18.2	9.1	18.2	36.4	36.4	3.9	16.8	57.4	21.8
OH Non-MSA	35.5	42	0.0	0.0	21.4	61.9	16.7	2.3	14.9	64.5	16.6
Springfield	8.0	10	10.0	10.0	30.0	50.0	10.0	7.4	27.0	40.9	24.7

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cincinnati	0	0	0	0	0	0
Columbus	0	1	0	0	-1	0
Dayton	0	1	0	-1	0	0
Mansfield	0	1	0	-1	0	0
OH Non-MSA	3	2	0	+2	-1	0
Springfield	0	1	0	0	0	-1

Management complements its traditional service delivery methods with certain alternative delivery systems, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. However, no metrics on effectiveness in serving low-or moderate-income residents were available.

In addition to the alternative delivery services noted above, Park provides traditional products and services through its retail branch network, which do not vary materially between offices or assessment areas. Examples of deposit products include checking, savings, certificates of deposit, health savings, and individual retirement accounts; trust services; and investment services. Deposit accounts can be opened with varying opening deposit and minimum balance requirements in order to match individual customer desires, including customers of low-and moderate-incomes. Examples of services offered include official checks, money orders, international drafts, wire transfers, safe deposit boxes, utility

payments (for both customers and non-customers), debit cards, checkbook balancing, and direct deposit. Most ATMs are deposit taking. The services provided include standard functions including account inquiry, withdrawal/fast cash, deposit, transfer and payment enclosure.

Columbus AA

Park's branch distribution in the Columbus AA is good, considering the population of low-or moderate-income geographies and number of branches in or near to low-and moderate-income geographies. Branches are reasonably accessible to geographies and individuals of different income levels in the assessment area. The percentage of branches in low-income geographies is below the percentage of the population in those low-income geographies, while the percentage of branches located in the moderate-income geographies exceeds the percentage of the population in those moderate-income geographies. Further, one non-low-and moderate-income branch is located near, and primarily serves, a low-income geography. Additionally, three additional non-low-and moderate-income branches are located near, and primarily serve, moderate-income geographies. Park maintains only a small number of branches in Franklin County, the core MSA county.

Branch openings and closings have generally not adversely affected the accessibility of the bank's delivery systems. The bank did not open any branches. Only one branch, located in a middle-income geography, was closed. However, the OCC notes that the closed branch was in a grocery store relatively near a low-income geography in Lancaster, Ohio.

Services and business hours do not vary in a way that inconveniences the bank's AAs, particularly low-and moderate-income geographies or individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography. The distribution of deposit-taking ATMs in both low-and moderate-income geographies is excellent when considering the percent of residents in the low-and moderate-income geographies.

Ohio Non-MSA

Park's branch distribution in the Ohio non-MSA is good, considering the population of low-or moderate-income geographies and number of branches in or near to low-and moderate-income geographies. Branches are reasonably accessible to geographies and individuals of different income levels in the assessment area. While there are no branches in low-income geographies, there are a low percentage of residents who live in such designated geographies, and only five such geographies in the 14 county AA. The percentage of branches located in the moderate-income geographies exceeds the percentage of the population in those moderate-income geographies. Further, three non-low-and moderate-income branches are located very near and serve either a low-or moderate-income geography.

To the extent changes have been made, the bank's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low-and moderate-income geographies or to low-and moderate-income individuals. The bank opened two branches in moderate-income geographies and did not close any branches in either low-or moderate-income geographies.

Services and business hours generally do not vary in a way that inconveniences its AA(s), particularly low-and moderate-income geographies and/or individuals. Services offered and banking hours are generally similar among locations regardless of the income level of the geography.

The distribution of deposit-taking ATMs in both low-and moderate-income geographies is poor. Out of 33 total ATMs in this AA, the OCC only noted two deposit-taking ATMs located in either a low-or moderate-income geography. This is well below the percentage of residents in the low-and moderate-income geographies.

Community Development Services

Park's performance in providing CD services in the state of Ohio is good. Park provides a relatively high level of CD services.

Columbus AA

In the Columbus AA, 43 different employees provided their expertise to 45 different community development organizations. In 106 instances, we noted employees serving as either board or committee members of community development organizations, demonstrating a high level of involvement and leadership. Those organizations operate to help meet community needs, such as such as emergency food and housing aid, youth mentoring, and job training. Other organizations supported were involved in affordable housing, economic development, or the financial literacy of low-and moderate-income individuals.

Ohio Non-MSA

In the OH Non-MSA, 32 different employees provided their expertise to 34 different community development organizations. In 51 instances, we noted employees serving as either board or committee members of community development organizations, demonstrating a high level of involvement and leadership. Those organizations operate to help meet community needs, such as healthcare for low-and moderate-income residents; affordable housing, including housing targeted at low-and moderate-income persons with disabilities and low-and moderate-income seniors; economic development; or the financial literacy of low-and-moderate income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Cincinnati and Dayton AAs is weaker than the bank's overall performance under the Service Test in the full-scope area(s). In both cases, the branch distributions are inferior to those in the full-scope areas. Performance is stronger in the Mansfield and Springfield AAs, as the branch distributions are superior.

State Rating

State of South Carolina

CRA rating for the State of South Carolina: Needs to Improve

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- The bank exhibits an adequate geographic distribution of loans in its AAs.
- The bank exhibits a poor distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.
- The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.
- The bank provides few if any CD services.

Description of Bank's Operations in South Carolina

Park entered this state during the current review period through its acquisitions of Carolina Alliance Bank, effective April 1, 2019. The acquisition involved personnel and facilities located in both the Spartanburg and Greenville MSAs. The description below relates only to the Spartanburg MSA AA, which was selected for a full-scope review.

The Spartanburg AA includes all of Spartanburg County, South Carolina. As of the 2015 ACS conducted by the U.S. Census Bureau, the population in this AA was 291,240 with 76,454 families, 123,931 housing units, and 17,466 businesses. The area is growing rapidly. The U.S. Census estimates the population at July 1, 2019 to be 319,785, an increase of 9.8 percent from 2015.

According to the 2015 ACS, 60.9 percent of the housing units were owner occupied, 27.8 percent were renter occupied, and 11.3 percent were vacant. Further, 82.2 percent of owner-occupied housing units were located in middle-or upper-income CTs, despite only 73.2 percent of total housing units being located in middle-or upper-income CTs. In addition, 41.8 percent of rental units were located in low-or moderate-income CTs despite only 26.8 percent of total housing units being located in either the low-or moderate-income CTs. Therefore, the number of owner-occupied housing units are skewed toward middle-and upper-income CTs, which in turn impacts opportunities for mortgage lending with more opportunities in middle-and upper-income areas, and fewer in low-and moderate-income areas.

Park has only one deposit taking office in the Spartanburg AA. Banking competition is significant in the AA, with 19 deposit-taking banks present operating 65 offices. Competition from large banks is substantial, with SunTrust Bank, Branch Banking and Trust Company, First Citizens Bank and Trust, Wells Fargo, and Bank of America being the top five in deposit market share. Many out of area banks, mortgage companies, and credit unions are active in the mortgage lending market. For 2019, the top mortgage market share leader was Wells Fargo. Numbers two through five in mortgage market share were all non-banks, including Quicken Loans, Pennymac Loan Services, Ark-LA-Tex Financial Services, and Founders Credit Union.

Park offers business loans in the Spartanburg AA. However, the bank was not yet subject to the CRA reporting requirements relating to its 2019 acquisition of Carolina Alliance Bank, and no small loans to business market share data was available for 2019.

The unemployment figures for Spartanburg County are comparable to the South Carolina statewide figures. Per the Bureau of Labor Statistics as of December 31, 2019, the unemployment rate for Spartanburg County was 2.1 percent compared to the statewide rate of 2.4 percent. While the unemployment rate was low, the poverty rate was significant, at 13.5 percent.

The median housing value in the Spartanburg AA was \$122,515, while the median family income was \$53,959, meaning low-income families made less than \$26,979. Therefore, median housing values were at least 4.5 times the annual incomes of low-income families. This metric is reflective of an obstacle to homeownership for low-income families and reduces opportunities for responsible mortgage lending.

The OCC also reviewed the information provided from a recent interview with a representative from an economic development organization serving a multi-county area of South Carolina, including Spartanburg. The contact mentioned needs for job training, affordable housing, and improvements to public transportation as significant community needs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Spartanburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	69	8.7	24.6	40.6	26.1	0.0
Population by Geography	291,240	4.8	20.8	43.6	30.8	0.0
Housing Units by Geography	123,931	5.3	21.5	43.8	29.4	0.0
Owner-Occupied Units by Geography	75,378	2.3	15.5	47.1	35.1	0.0
Occupied Rental Units by Geography	34,514	10.7	31.1	38.8	19.5	0.0
Vacant Units by Geography	14,039	8.7	29.8	38.3	23.2	0.0
Businesses by Geography	17,466	2.4	20.9	41.1	35.6	0.0
Farms by Geography	501	1.0	17.2	48.7	33.1	0.0
Family Distribution by Income Level	76,454	21.0	17.4	18.9	42.7	0.0
Household Distribution by Income Level	109,892	23.6	15.6	17.3	43.5	0.0
Median Family Income MSA – Spartanburg MSA		\$53,959	Median Housing Value			\$122,515
			Median Gross Rent			\$695
			Families Below Poverty Level			13.5%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in South Carolina

For South Carolina, we completed a full-scope review of the Spartanburg AA. Due to the timing of Park’s entry into the state, only 2019 activity was considered. The OCC selected the full-scope area

based on the amount of Park's deposits in the state of South Carolina. The Spartanburg AA accounts for 69 percent of deposits, 20 percent of branches, and 37 percent of home mortgage loans. While Spartanburg was considered full-scope for this exam, business operations are also extensive in the Greenville AA; therefore, the OCC attributed significant weight to that limited-scope rating area as well.

Park was not subject to the CRA reporting requirements relating to its 2019 acquisition of Carolina Alliance Bank, so no analysis was performed of loans to small businesses.

Also, due to the limited branch network in the State, for the service test analysis, we gave greater weight to community development service performance than was placed in Ohio.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in South Carolina is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Spartanburg AA is poor.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Greenville	67	0	0	0	67	62.6	31.0
Spartanburg	40	0	0	0	40	37.4	69.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Greenville	15,084	0	0	0	15,084	66.0	31.0
Spartanburg	7,781	0	0	0	7,781	34.0	69.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank's overall lending activity in the Spartanburg AA is adequate considering the strong level of competition for all types of loans in the bank's AA. Many competitors are national or regional banks with a well-established local presence. Well known national mortgage companies are also active in the Spartanburg AA.

The OCC also considered the low cost of entry into the loan origination market, which increases competition with non-banks as compared to the high cost of entry into the traditional deposit gathering market. Park gathers deposits primarily through traditional branch offices.

Park's lending activity reflects adequate responsiveness to area credit needs in the Spartanburg AA when considering the bank's deposits, branch network and limited time in the market. Park ranks 7th out of 19 depository banks with a deposit market share of 6.3 percent. For HMDA loans, Park's market share of 0.3 percent ranks 65th out of 380 lenders. Due to the timing of the South Carolina acquisition, reporting of small loans to businesses was not yet required; therefore, that lending is not displayed in the table above. Park did not offer small loans to farms in this rating area during 2019.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

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

Park's geographic distribution of home mortgage loans in the Spartanburg AA is poor.

The percentage of loans originated in both low-and moderate-income geographies is significantly below both the percentage of owner-occupied housing units and the percentage of aggregate lending. The OCC considered Park's new and limited presence in the AA.

Small Loans to Businesses

Due to the timing of Park's acquisition of Carolina Alliance Bank, reporting of small loans to business was not yet required.

Small Loans to Farms

Due to the timing of Park's acquisition of Carolina Alliance Bank, reporting of small loans to farms was not yet required.

Lending Gap Analysis

A meaningful gap analysis could not be conducted.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

Park's borrower distribution of home mortgage loans in the Spartanburg AA is poor. The percentage of loans to both low-and moderate-income borrowers is significantly below both the percentage of low-and moderate-income families. Further, the percentage of loans to both low-and moderate-income borrowers is significantly below the percentage of aggregate lending to those families.

The OCC considered the median price of housing in the AA relative to the maximum income of borrowers in the low-income category, which demonstrates a significant barrier to homeownership for low-income families. The OCC also considered the newness of the bank to the Spartanburg AA and the strong level of competition.

Small Loans to Businesses

Due to the timing of Park's acquisition of Carolina Alliance Bank, reporting of small loans to business was not yet required.

Small Loans to Farms

Due to the timing of Park's acquisition of Carolina Alliance Bank, reporting of small loans to farms was not yet required.

Community Development Lending

The bank made no CD loans in this rating area.

Product Innovation and Flexibility

The bank makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Greenville AA is stronger than the bank's overall performance under the Lending Test in the full-scope area. In the Greenville AA, the home lending geographic and borrower distributions are substantially better than in the Spartanburg AA.

Refer to Tables O through V in the state of South Carolina section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in South Carolina is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Spartanburg AA is poor.

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits poor responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Greenville	0	0	3	1,217	3	60.0	1,217	83.1	0	0
Spartanburg	0	0	2	247	2	40.0	247	16.9	0	0

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

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

The bank's investments in the Spartanburg AA are primarily qualified MBS where the majority of the underlying loans are to low-or moderate-income borrowers. The quantity of MBS is poor when compared to tier one capital allocated to the Spartanburg AA (0.7 percent). There were few grants or other investments present that may have been more responsive to community needs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Greenville AA is stronger than the bank's overall performance under the Investment Test in the full-scope area. Investments in the Greenville AA equate to 4.5 percent of tier one capital.

SERVICE TEST

The bank's performance under the Service Test in South Carolina is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Spartanburg AA is poor.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp			
Greenville	31.0	4	80.0	0	1	2	1	5.8	20.2	41.0	26.4
Spartanburg	69.0	1	20.0	0	0	0	1	4.8	20.8	43.6	30.8

The bank did not open or close any branches during the evaluation period. There are no loan production offices in the state.

Services offered, including business hours, do not vary in a way that inconveniences portions of the Spartanburg AA, particularly low-and moderate-income geographies. While there is only one office in

the Spartanburg AA, that office is located near a moderate-income geography. Further, the OCC noted the office has a drive-thru; however, no evening or weekend hours are offered.

Park provides traditional products and services through its retail branch in the Spartanburg AA. Examples of deposit products include checking, savings, certificates of deposit, health savings, and individual retirement accounts; trust services; and investment services. The bank does little to tailor services to low-and moderate-income residents. Examples of other services offered include official checks, money orders, wire transfers, safe deposit boxes, debit cards, and direct deposit. The bank has a deposit taking ATM. The services provided include standard functions including account inquiry, withdrawal/fast cash, deposit, transfer, and payment enclosure.

Management complements its traditional service delivery methods with certain alternative delivery processes including online banking, mobile banking, an ATM, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. However, metrics are not maintained to measure effectiveness at reaching low-or moderate-income residents.

Community Development Services

The bank provides few if any CD services.

Conclusions for Area Receiving a Limited-Scope Review

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

Appendix A: Scope of Examination

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

Time Period Reviewed:	(01/01/2017 to 12/31/2019)	
Bank Products Reviewed:	Home mortgage, small business, small farm, community development loans, qualified investments, community development services	
Affiliate	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State		
North Carolina		
Asheville MSA	Limited-scope	Counties of Buncombe and Henderson
Charlotte MSA	Full-scope	Counties of Iredell and Mecklenberg
Ohio		
Cincinnati MMSA	Limited-scope	Counties of Butler, Clermont, Hamilton, and Warren
Columbus MSA	Full-scope	Counties of Fairfield, Franklin, Hocking, Licking, Madison, Morrow and Perry
Dayton MSA	Limited-scope	Counties of Greene, Miami, and Montgomery
Mansfield MSA	Limited-scope	County of Richland
Ohio non-MSA	Full-scope	Counties of Ashland, Athens, Champaign, Crawford, Coshocton, Darke, Guernsey, Holmes, Knox, Marion, Mercer, Muskingum, Tuscarawas, and Wayne.
Springfield MSA	Limited-scope	County of Clark
South Carolina		
Greenville MSA	Limited-scope	Counties of Anderson, Greenville, and Pickens
Spartanburg MSA	Full-scope	County of Spartanburg

Appendix B: Summary of State Ratings

RATINGS Park National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State:				
North Carolina	Low Satisfactory	Low Satisfactory	Needs to Improve	Needs to Improve
Ohio	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
South Carolina	Low Satisfactory	Low Satisfactory	Needs to Improve	Needs to Improve

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography (NORTH CAROLINA)																	2019		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Asheville MSA	31	12,015	19.0	1.6	9.7	1.7	9.4	3.2	9.1	63.8	48.4	62.2	25.1	38.7	27.0	0.0	0.0	0.0	
Charlotte MSA	132	52,079	81.0	4.2	0.8	3.8	15.6	5.3	13.8	29.2	10.6	26.6	50.9	83.3	55.8	0.0	0.0	0.1	
Total	163	64,094	100.0	3.5	2.5	3.4	13.9	4.9	12.8	38.6	17.8	34.0	43.9	74.8	49.8	0.0	0.0	0.0	

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

Table P : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower (NORTH CAROLINA)																	2019		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
Asheville MSA	31	12,015	19.0	19.4	0.0	4.6	18.4	0.0	16.3	20.5	0.0	21.6	41.7	74.2	46.9	0.0	25.8	10.6	
Charlotte MSA	132	52,079	81.0	22.1	0.8	4.0	15.5	3.0	13.2	17.6	6.1	18.1	44.8	85.6	48.5	0.0	4.5	16.1	
Total	163	64,094	100.0	21.4	0.6	4.2	16.2	2.5	13.9	18.3	4.9	18.8	44.0	83.4	48.2	0.0	8.6	15.0	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography (NORTH CAROLINA)																	2019		
Assess. Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Bus.	% Bank Loans	Agg.	% Bus.	% Bank Loans	Agg.	% Bus.	% Bank Loans	Agg.	% Bus.	% Bank Loans	Agg.	% Bus.	% Bank Loans	Agg.
Asheville MSA	0	0	0.0	8,915	3.3	0.0	3.1	14.3	0.0	15.2	51.9	0.0	52.1	30.5	0.0	29.5	0.0	0.0	0.0
Charlotte MSA	67	17,120	100.0	31,553	8.1	9.0	8.8	15.4	16.4	16.2	23.4	14.9	21.7	52.0	59.7	52.5	1.1	0.0	0.8
Total	67	17,120	100.0	40,468	7.0	9.0	7.6	15.1	16.4	15.9	30.0	14.9	28.4	47.0	59.7	47.4	0.9	0.0	0.7

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues (NORTH CAROLINA)											2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Asheville MSA	--	--	--	8,915	88.5	--	48.8	3.9	--	7.6	--	
Charlotte MSA	67	17,120	100.0	31,553	85.9	43.3	46.6	4.8	49.3	9.3	7.5	
Total	67	17,120	100.0	40,468	86.5	43.3	47.1	4.6	49.3	8.9	7.5	

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography (OHIO)																2017-19		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cincinnati MMSA	891	168,992	7.4	4.1	3.7	3.0	15.1	14.5	12.4	39.2	47.7	38.1	41.5	34.0	46.3	0.1	0.1	0.2
Columbus MSA	3,792	516,807	31.4	6.3	5.1	5.7	21.0	20.2	18.3	38.1	50.7	36.6	34.6	24.0	39.3	0.0	0.0	0.0
Dayton MSA	628	72,422	5.2	5.7	2.2	2.4	16.3	23.7	12.0	45.6	47.5	46.9	32.4	26.6	38.7	0.0	0.0	0.0
Mansfield MSA	965	101,461	8.0	2.2	1.1	0.9	13.6	8.8	9.1	57.9	56.4	57.2	26.3	33.7	32.8	0.0	0.0	0.0
OH non-MSA	5,288	548,479	43.7	1.1	0.5	0.7	12.7	11.2	11.4	67.7	72.6	67.5	18.5	15.6	20.4	0.1	0.0	0.1
Springfield MSA	529	49,236	4.4	3.1	2.3	1.3	20.2	23.6	17.4	46.6	42.7	45.9	30.1	31.4	35.5	0.0	0.0	0.0
Total	12,093	1,457,396	100.0	4.4	2.4	3.6	16.7	15.3	14.5	45.5	60.0	42.4	33.3	22.3	39.4	0.1	0.0	0.1

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

Table P : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower (OHIO)																2017-19		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Cincinnati MMSA	891	168,992	7.4	22.3	4.8	7.4	16.1	13.5	17.5	19.4	20.2	20.3	42.2	47.1	40.1	0.0	14.4	14.7
Columbus MSA	3,792	516,807	31.4	24.1	12.3	7.8	17.8	21.6	19.6	19.9	21.2	21.1	38.2	35.0	35.6	0.0	9.8	15.9
Dayton MSA	628	72,422	5.2	22.6	11.9	8.6	17.0	19.7	19.3	19.6	21.2	21.2	40.9	32.6	36.0	0.0	14.5	14.9
Mansfield MSA	965	101,461	8.0	20.6	6.5	5.6	18.5	17.8	17.6	20.9	27.8	24.6	40.0	41.1	38.5	0.0	6.7	13.8
OH non-MSA	5,288	548,479	43.7	20.1	8.3	7.1	18.2	20.7	20.3	22.4	23.4	24.0	39.3	40.5	34.1	0.0	7.2	14.5
Springfield MSA	529	49,236	4.4	20.9	13.6	7.7	17.4	15.7	19.8	20.9	19.8	22.0	40.8	31.6	33.4	0.0	19.3	17.1
Total	12,093	1,457,39	100.0	22.5	9.6	7.7	17.2	19.9	18.9	20.2	22.5	21.2	40.1	38.5	37.0	0.0	9.4	15.2

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography (OHIO)																	2017-19		
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assess. Area:	#	\$	% of Total	Overall Market	% Bus.	% Bank Loans	Agg.	% Bus.	% Bank Loans	Agg.	% Bus.	% Bank Loans	Agg.	% Bus.	% Bank Loans	Agg.	% Bus.	% Bank Loans	Agg.
Cincinnati MMSA	253	70,563	5.0	30,061	7.4	8.7	7.3	17.8	13.4	18.2	32.0	34.4	31.4	41.6	42.3	42.1	1.2	1.2	0.9
Columbus MSA	1,296	228,053	25.8	30,614	10.6	9.7	15.8	20.1	20.6	16.9	31.3	44.4	28.8	37.5	25.2	38.1	0.6	0.1	0.4
Dayton MSA	494	75,249	9.8	11,437	7.2	4.0	7.0	17.3	18.4	17.1	43.2	47.0	42.6	32.3	30.6	33.2	0.0	0.0	0.0
Mansfield MSA	386	62,166	7.7	1,619	9.0	11.9	9.0	15.0	12.2	15.3	48.4	44.6	49.6	27.6	31.3	26.1	0.0	0.0	0.0
OH non-MSA	2,043	243,791	40.6	10,405	1.6	0.5	1.1	15.7	9.0	14.3	64.1	76.0	65.5	17.6	14.5	18.6	1.0	0.0	0.6
Springfield MSA	555	60,449	11.0	1,553	5.0	4.0	4.4	27.2	29.6	27.5	38.0	37.5	36.1	29.9	29.0	32.1	0.0	0.0	0.0
Total	5,027	740,271	100.0	85,689	7.7	4.9	9.5	18.4	15.7	17.2	38.2	56.2	36.5	35.0	23.1	36.2	0.7	0.1	0.5
<i>Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues (OHIO)										2017-19	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cincinnati MMSA	253	70,563	5.0	30,061	82.2	65.6	47.8	6.4	29.6	11.4	4.7
Columbus MSA	1,296	228,053	25.8	30,614	83.6	63.7	42.3	5.3	31.3	11.0	5.1
Dayton MSA	494	75,249	9.8	11,437	81.4	51.6	45.9	6.2	44.5	12.4	3.8
Mansfield MSA	386	62,166	7.7	1,619	79.0	52.3	47.2	6.0	43.3	15.0	4.4
OH non-MSA	2,043	243,791	40.6	10,405	80.2	66.6	47.5	6.1	27.8	13.7	5.6
Springfield MSA	555	60,449	11.0	1,553	79.1	70.5	47.3	6.3	22.2	14.6	7.4
Total	5,027	740,271	100.0	85,689	82.2	63.7	45.5	5.9	31.0	11.8	5.4

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography (OHIO)																	2017-2019		
	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assess Area	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Agg.	% Farms	% Bank Loans	Agg.	% Farms	% Bank Loans	Agg.	% Farms	% Bank Loans	Agg.	% Farms	% Bank Loans	Agg.
Cincinnati MMSA	0	0	0.0	165	3.3	0.0	0.6	13.8	0.0	5.5	46.2	0.0	61.2	36.5	0.0	32.7	0.2	0.0	0.0
Columbus MSA	127	14,436	16.8	380	6.0	0.8	1.6	16.8	0.0	9.7	47.4	84.3	67.1	29.7	15.0	21.1	0.1	0.0	0.5
Dayton MSA	53	5,646	6.5	205	3.2	0.0	0.5	12.4	7.5	6.8	53.5	60.4	54.1	30.9	32.1	38.5	0.0	0.0	0.0
Mansfield MSA	13	458	1.5	73	1.1	0.0	2.7	4.8	0.0	0.0	65.8	30.8	78.1	28.2	69.2	19.2	0.0	0.0	0.0
OH non-MSA	540	54,377	60.7	1,156	0.3	0.0	0.3	4.8	0.9	2.2	69.4	82.8	75.6	25.5	16.3	21.9	0.0	0.0	0.0
Springfield MSA	156	22,551	17.5	100	3.5	0.0	0.0	17.2	0.0	3.0	44.1	80.8	68.0	35.2	19.2	29.0	0.0	0.0	0.0
Total	889	97,468	100.0	2,079	3.0	0.1	0.6	11.4	1.0	4.3	55.4	80.5	70.5	30.2	18.3	24.5	0.1	0.0	0.1

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues (OHIO)										2017-19	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Cincinnati MMSA	--	--	--	165	96.1	--	65.5	1.9	--	2.0	--
Columbus MSA	127	14,436	14.3	380	95.7	89.8	51.6	2.7	5.5	1.7	4.7
Dayton MSA	53	5,646	6.0	205	95.9	84.9	57.6	2.6	9.4	1.5	5.7
Mansfield MSA	13	458	1.5	73	97.5	92.3	54.8	1.7	0.0	0.8	7.7
OH non-MSA	540	54,377	60.7	1,156	97.8	83.9	59.3	1.3	11.9	1.0	4.3
Springfield MSA	156	22,551	17.5	100	97.3	89.7	57.0	1.9	5.8	0.8	4.5
Total	889	97,468	100.0	2,079	96.5	85.9	58.0	2.0	9.6	1.5	4.5

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography (SOUTH CAROLINA)																2019		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Greenville MSA	67	15,084	62.6	3.4	4.5	2.7	17.3	16.4	12.2	44.3	40.3	41.5	34.9	38.8	43.7	0.0	0.0	0.0
Spartanburg MSA	40	7,781	37.4	2.3	0.0	1.0	15.6	5.0	9.9	47.1	42.5	45.6	35.1	52.5	43.5	0.0	0.0	0.0
Total	107	22,865	100.0	3.1	2.8	2.3	16.9	12.2	11.6	45.1	41.1	42.5	35.0	43.9	43.6	0.0	0.0	0.0

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

Table P : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower (SOUTH CAROLINA)																2019		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Greenville MSA	67	15,084	62.6	22.1	1.5	6.2	16.8	11.9	19.2	18.8	14.9	21.1	42.3	55.2	38.6	0.0	16.4	14.9
Spartanburg MSA	40	7,781	37.4	21.0	0.0	6.1	17.4	5.0	19.7	18.9	15.0	25.5	42.7	70.0	32.6	0.0	10.0	16.0
Total	107	22,865	100.0	21.8	0.9	6.2	17.0	9.3	19.3	18.8	15.0	22.2	42.4	60.7	37.0	0.0	14.0	15.2

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