



## **PUBLIC DISCLOSURE**

August 07, 2023

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The First National Bank of McConnellsville  
Charter Number: 46

86 North Kennebec Avenue  
McConnellsville, OH 43756

Office of the Comptroller of the Currency

655 Metro Place South  
Suite 625  
Dublin, OH 43017

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

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## Overall CRA Rating

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

**The lending test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on the state rating and the following overall conclusions:
  - The loan-to-deposit (LTD) ratio is reasonable.
  - A majority of the bank's loans are inside the assessment area (AA).
  - The bank exhibits a reasonable geographic distribution of loans in the AAs.
  - The bank exhibits a reasonable distribution of loans to individuals of different income levels.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is reasonable.

The First National Bank of McConnelsville's (FNB or bank) quarterly average LTD ratio over the 16 quarters since the previous Community Reinvestment Act (CRA) evaluation (March 31, 2019, to December 31, 2022) is 58.4 percent. The ratio ranged from a high of 62.3 percent as of December 31, 2019, to a low of 51.8 percent as of December 31, 2020. The bank's quarterly average LTD ratio is reasonable when compared to financial institutions of similar size headquartered in the bank's AAs or surrounding counties (Morgan and Perry Counties, Ohio), which includes three additional financial institutions with total assets between \$91 and \$211 million. FNB's average LTD ratio is within the range of these financial institutions which have average LTD ratios ranging from 56.3 percent to 79.7 percent, and an overall average of 68 percent during the same time period.

## Lending in Assessment Area

A majority of the bank's loans are inside its AAs. The bank originated 66.1 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	238	66.1	122	33.9	360	28,935	51.4	27,309	48.6	56,244
<b>Total</b>	<b>238</b>	<b>66.1</b>	<b>122</b>	<b>33.9</b>	<b>360</b>	<b>28,935</b>	<b>51.4</b>	<b>27,309</b>	<b>48.6</b>	<b>56,244</b>

*Source: 2020, 2021, and 2022 Bank Data.  
Due to rounding, totals may not equal 100.0%*

## Description of Institution

FNB is a wholly owned subsidiary of a one-bank holding company, FNB Shares. FNB and its holding company are both headquartered in McConnelsville, OH. FNB is an intrastate bank with six banking offices located in Athens, Morgan, and Perry Counties. FNB's banking offices are in McConnelsville and Stockport (Morgan County), Athens, Glouster, and Nelsonville (Athens County), and Junction City (Perry County). Automated teller machines (ATMs) are available at each of these six branch offices. FNB has not opened or closed any branches since their last CRA evaluation, dated March 18, 2019. FNB did not engage in any merger or acquisition activity since their last CRA evaluation. The OCC did not consider any affiliate activity during this review. FNB offers traditional loan and deposit products with a focus on 1-4 family mortgage lending.

FNB is a single-state financial institution with one rating area (Ohio) and two designated AAs: Perry and Hocking Counties are part of the Columbus OH MSA #18140, and Athens and Morgan County are part of the Ohio Non-MSA AA. As of 2022, the Columbus OH MSA contained one medium-income census tract (CT) in Hocking County (9655) and two moderate-income CTs in Perry County (9663.01 and 9663.02). While FNB does not have a branch in Hocking County, management has elected to include the CT in their AA as the Nelsonville branch is located near the border of Athens and Hocking Counties. Prior to 2022, the two Perry County CTs were combined as one CT and were designated as CT 9663. Notably, census data prior to 2022 indicated CT 9665 (Hocking) was a moderate-income CT and CT 9663 (Perry) was a low-income CT.

As of 2022, the Ohio Non-MSA contained two medium-income CTs in Athens (9744) and Morgan (9688) Counties and six moderate-income CT in Athens (9726, 9727, and 9728) and Morgan (9689, 9690, and 9691) Counties. Notably, census data prior to 2022 indicated that CTs 9727 and 9728 (Athens), and 9690 (Morgan) were medium-income CTs and CT 9734 (Athens) was a moderate-income CT.

As of June 30, 2023, FNB reported total assets of \$186.5 million with tier 1 capital of \$12.9 million. Net loans and leases accounted for 56.2 percent of average assets. Loans secured by residential real estate, including home equity lines of credit, first liens, and junior liens, represented 64.7 percent of total loans. The remainder of the loan portfolio is comprised of commercial loans (19.9 percent), consumer loans (6.7 percent), multifamily residential loans (4 percent), construction and development (2.3 percent), and farmland loans (1.7 percent).

The previous CRA evaluation dated March 18, 2019, resulted in a Satisfactory rating. There are no legal or financial impediments to FNB's ability to meet the credit needs of its community.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its community, including LMI areas. The OCC used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The evaluation period was from January 1, 2020, to December 31, 2022.

The OCC evaluated the bank's lending performance based on its primary lending product, home mortgages. While the bank offers other lending products, the OCC did not consider these as part of the performance evaluation given they are not primary products and an analysis of this data would not be meaningful. FNB's lending products are discussed under the "Description of Institution" section in this report. For the Lending Test, the OCC evaluated all home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) for 2020, 2021, and 2022.

For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census data for calendar years 2020 and 2021, and demographic data from the 2020 ACS U.S. Census data for calendar year 2022. The OCC utilized June 2021 Dun and Bradstreet (D&B) data for calendar years 2020 and 2021, and D&B data as of June 2022 for calendar year 2022. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas 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 for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

FNB has two AAs, the Columbus OH MSA and the Ohio Non-MSA, as described above under the "Description of Institution" section. The OCC completed a full-scope review for both AAs. A description of the AAs is also provided in the "Description of Institutions Operations in Ohio" section of this evaluation.

### **Ratings**

The bank's overall rating is a blend of the state ratings. Since all the bank's offices are in Ohio, the bank's rating is based on performance solely in Ohio.

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

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

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

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

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

## State Rating

### State of Ohio

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

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- FNB exhibits reasonable geographic distribution of loans in the State.
- FNB exhibits a reasonable distribution of loans to individuals of different income levels given the product lines offered by the bank.
- The bank has not received any complaints about its performance in helping to meet the AAs' credit needs during the evaluation period.

### Description of Institution's Operations in Ohio

FNB designates two AAs in Ohio, the Ohio Non-MSA AA and the Columbus OH MSA AA. FNB selected these AAs based on their targeted lending area and office locations.

#### **Ohio Non-MSA AA**

During the evaluation period, the Non-MSA AA includes CTs 9726, 9727, 9728, and 9734 in Athens County and CTs 9688, 9689, and 9690 in Morgan County.

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contact/credit needs provides additional performance context for FNB's operations in Ohio. The table below provides a summary of demographic data for the AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB McConnellsville Non-MSA AA (2020/2021)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	8	0.0	50.0	50.0	0.0	0.0
Population by Geography	31,342	0.0	49.6	50.4	0.0	0.0
Housing Units by Geography	15,087	0.0	50.0	50.0	0.0	0.0
Owner-Occupied Units by Geography	8,403	0.0	48.7	51.3	0.0	0.0
Occupied Rental Units by Geography	3,782	0.0	52.9	47.1	0.0	0.0
Vacant Units by Geography	2,902	0.0	49.9	50.1	0.0	0.0
Businesses by Geography	1,446	0.0	58.3	41.7	0.0	0.0
Farms by Geography	117	0.0	46.2	53.8	0.0	0.0
Family Distribution by Income Level	8,128	29.8	19.2	20.7	30.3	0.0
Household Distribution by Income Level	12,185	33.9	18.4	15.4	32.3	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$87,454
			Median Gross Rent			\$605
			Families Below Poverty Level			20.5%
<i>Source: 2015 ACS and 2021 D&amp;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>						

### Demographic Data (2020/2021)

As of the 2015 ACS U.S. Census data in the table above, the population of the Non-MSA AA is 31,432, with 49.6 percent of the population living in moderate-income CTs and 50.4 percent living in middle-income CTs. As of the 2015 ACS U.S. Census, the AA consists of eight CTs, and is comprised of four moderate-income CTs and four middle-income CTs. The AA includes 8,128 families and 12,185 households. Four CTs received classification changes during the evaluation period. Prior to 2022, CTs 9272, 9728 (Athens), and 9690 (Morgan) were classified as middle-income CTs and CT 9734 was classified as a moderate-income CT. Currently, CTs 9272, 9728, and 9690 are classified as moderate-income CTs and CT 9734 is classified as a middle-income CT.

### Affordable Housing Cost (2020/2021)

According to the 2015 U.S. Census data in the table above, the median housing value is \$87,454. With the median family income of \$55,875, moderate-income families make less than \$44,628 annually and low-income families make less than \$27,893 annually. Median housing values are 1.9 times the annual income of moderate-income families and 3.1 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among these families. The 2015 U.S. Census data shows there are 15,087 total housing units in the Non-MSA AA, of which 55.7 percent are owner-occupied, 25 percent are occupied rentals, and 19.2 percent are vacant units. The median age of housing stock is 61 years in moderate-income CTs and 47 years in middle-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing in moderate-income CTs is also a significant barrier to mortgage lending in those CTs. Additionally, 20.5 percent of the families and 25.9 percent of the households live below the



poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB McConnellsville Non-MSA AA (2022)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	8	0.0	75.0	25.0	0.0	0.0
Population by Geography	28,446	0.0	78.3	21.7	0.0	0.0
Housing Units by Geography	15,213	0.0	77.3	22.7	0.0	0.0
Owner-Occupied Units by Geography	8,281	0.0	76.0	24.0	0.0	0.0
Occupied Rental Units by Geography	3,722	0.0	76.9	23.1	0.0	0.0
Vacant Units by Geography	3,210	0.0	81.3	18.7	0.0	0.0
Businesses by Geography	1,883	0.0	70.8	29.2	0.0	0.0
Farms by Geography	132	0.0	72.0	28.0	0.0	0.0
Family Distribution by Income Level	7,554	30.4	22.1	21.7	25.8	0.0
Household Distribution by Income Level	0	0.0	0.0	0.0	0.0	0.0
Median Family Income Non-MSAs - OH		\$66,684	Median Housing Value			\$98,531
			Median Gross Rent			\$670
			Families Below Poverty Level			16.0%
<i>Source: 2020 U.S. Census and 2022 D&amp;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>						

### Demographic Data (2022)

As of the 2020 ACS U.S. Census data in the table above, the population of the Non-MSA AA is 28,446, with 78.3 percent of the population living in moderate-income CTs and 21.7 percent living in middle-income CTs. As of the 2020 ACS U.S. Census, the AA consists of eight CTs, and is comprised of six moderate-income CTs and two middle-income CTs. The AA includes 7,554 families. Four CTs received classification changes during the evaluation period. Prior to 2022, CTs 9272, 9728 (Athens), and 9690 (Morgan) were classified as middle-income CTs and CT 9734 was classified as a moderate-income CT. Currently, CTs 9272, 9728, and 9690 are classified as moderate-income CTs and CT 9734 is classified as a middle-income CT.

### Affordable Housing Cost (2022)

According to the 2020 U.S. Census data in the table above, the median housing value is \$98,531. With the median family income of \$66,684, moderate-income families make less than \$53,347 annually and low-income families make less than \$33,342 annually. Median housing values are 1.8 times the annual income of moderate-income families and 2.9 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among these families. The 2020 U.S. Census data shows there are 15,213 total housing units in the Non-MSA AA, of which 54.4 percent are owner-occupied, 24.5 percent are occupied rentals, and 21.1 percent are vacant units. The median age of housing stock is 58 years in moderate-income CTs and 54 years in middle-income CTs.

The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing in moderate- and middle-income CTs is also a significant barrier to mortgage lending in those CTs. Additionally, 16 percent of the families and 23.2 percent of the households live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

### Job Market and Economic Conditions

The economic conditions in the Non-MSA AA improved since the start of the COVID-19 pandemic and are overall stable. Unemployment rates in Athens and Morgan Counties and national unemployment rates experienced a significant increase during early 2020 but have been declining to historical normal levels since June 2021, per the Ohio Department of Job and Family Services – Bureau of Labor Market Information. The “not-seasonally adjusted” unemployment in June 2023 was consistent with the same national unemployment metric at 3.8 percent. June 2023 data indicates the unemployment rate in Athens County is 5.2 percent and the unemployment rate in Morgan County is 3.6 percent.

Per 2015 U.S. Census data and D&B data as of June 2021, most of the business in the Ohio Non-MSA AA are categorized as one of these five standard industrial classification (SIC) codes: Services (37 percent), Retail Trade (17.5 percent), Non-Classifiable Establishments (8.7 percent), Agriculture, Forestry & Fishing (7.5 percent), and Construction (7.3 percent), with the remaining share of SIC businesses comprising less than 7 percent concentration. Primary employers in the AA include MIBA Bearings LLC., MIBA Sinter U.S., and Morgan Local Schools. The 2020 U.S. Census data and D&B data as of June 2022 yielded similar results.

### Competition

Competition for deposits in the AA is strong given the number and size of financial institutions. Competition stems from local community banks and branches of larger financial institutions. According to the June 30, 2022, Deposit Market Share Report from the Federal Deposit Insurance Corporation (FDIC), 10 financial institutions with a total of 24 offices operated in Athens and Morgan Counties. FNB held the fourth largest deposit share in the Non-MSA AA at 13.2 percent as of June 30, 2022, with \$160.2 million in deposits. FNB’s primary competitors hold approximately 70 percent of the deposit market share and include JPMorgan Chase Bank, The Hocking Valley Bank, and Peoples Bank.

Strong competition for home mortgage loans also exists. Per 2021 Peer Mortgage Data and 2015 U.S. Census data, FNB held the second largest home mortgage market share in the Non-MSA AA at 8.9 percent by total number and 9.3 percent by total dollar amount of home mortgage loans. Other competitors include Peoples Bank, Rocket Mortgage, North Valley Bank, and Huntington National Bank who hold a combined 23.6 percent of home mortgage market share by total number and 19.8 percent by total dollar amount. Per 2022 Peer Mortgage Data and 2020 U.S. Census data, FNB continued to hold the second largest home mortgage market share in the Non-MSA AA at 7.9 percent by total number and 6.4 percent by total dollar amount. Key competitors include Peoples Bank, Rocket Mortgage, Vanderbilt Mortgage and Finance, and The Park National Bank who hold a combined 23.5 percent by total number and 17.9 percent by total dollar amount.

### Community Contact/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information provided from one interview with a representative from a CD organization. The contact stated that grants for home repair and no or low minimum balance checking accounts for youth are needs in the community. In general,

local financial institutions are adequately meeting the credit and community development needs of the community.

### **Columbus OH MSA AA**

During the evaluation period, the Columbus OH MSA AA included CT 9655 in Hocking County and CTs 9663.01 and 9663.02 in Perry County.

The following information regarding demographic data, affordable housing cost, job market and economic conditions, and competition provides additional performance context for FNB's operations in Ohio. The table below provides a summary of demographic data for the AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB McConnelsville MSA AA (2020/2021)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	2	50.0	50.0	0.0	0.0	0.0
Population by Geography	10,770	60.1	39.9	0.0	0.0	0.0
Housing Units by Geography	4,418	63.6	36.4	0.0	0.0	0.0
Owner-Occupied Units by Geography	2,993	61.2	38.8	0.0	0.0	0.0
Occupied Rental Units by Geography	862	71.5	28.5	0.0	0.0	0.0
Vacant Units by Geography	563	63.9	36.1	0.0	0.0	0.0
Businesses by Geography	284	59.5	40.5	0.0	0.0	0.0
Farms by Geography	22	68.2	31.8	0.0	0.0	0.0
Family Distribution by Income Level	2,880	45.9	20.9	19.1	14.2	0.0
Household Distribution by Income Level	3,855	38.5	22.0	18.9	20.6	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$79,535
			Median Gross Rent			\$628
			Families Below Poverty Level			21.8%
<i>Source: 2015 ACS and 2021 D&amp;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>						

### **Demographic Data (2020/2021)**

According to the 2015 ACS U.S. Census data in the table above, the population of the Columbus OH MSA AA is 10,770, with 60.1 percent of the population living in a low-income CT and 39.9 percent living in a moderate-income CT. The AA consists of two CTs, one low-income CT and one moderate-income CT. The AA includes 2,880 families and 3,855 households.

Affordable Housing Cost (2020/2021)

According to the 2015 U.S. Census data in the table above, the median housing value is \$79,535. With the median family income of \$70,454, moderate-income families make less than \$56,363 annually and low-income families make less than \$35,227 annually. Median housing values are 1.4 times the annual income of moderate-income families and 2.3 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among these families. The 2015 U.S. Census data shows there are 4,418 total housing units in the Columbus OH MSA AA, of which 67.7 percent are owner-occupied, 19.5 percent are occupied rentals, and 12.7 percent are vacant units. The median age of housing stock is 48 years in low-income CTs and 37 years in moderate-income CTs. Additionally, 21.8 percent of the families and 24.5 percent of the households live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB McConnellsville MSA AA (2022)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	3	0.0	66.7	33.3	0.0	0.0
Population by Geography	9,272	0.0	62.3	37.7	0.0	0.0
Housing Units by Geography	4,418	0.0	61.6	38.4	0.0	0.0
Owner-Occupied Units by Geography	3,063	0.0	55.6	44.4	0.0	0.0
Occupied Rental Units by Geography	584	0.0	73.8	26.2	0.0	0.0
Vacant Units by Geography	771	0.0	76.3	23.7	0.0	0.0
Businesses by Geography	400	0.0	61.8	38.3	0.0	0.0
Farms by Geography	29	0.0	69.0	31.0	0.0	0.0
Family Distribution by Income Level	2,718	24.9	23.8	32.1	19.2	0.0
Household Distribution by Income Level	0	0.0	0.0	0.0	0.0	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$84,088	Median Housing Value			\$109,425
			Median Gross Rent			\$698
			Families Below Poverty Level			11.4%
<i>Source: 2020 U.S. Census and 2022 D&amp;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>						

Demographic Data (2022)

As of the 2020 ACS U.S. Census data in the table above, the population of the Columbus OH MSA AA is 9,272, with 62.3 percent of the population living in the moderate-income CT and 37.7 percent living in the middle-income CT. As of the 2020 ACS U.S. Census, the AA consists of three CTs, and is comprised of two moderate-income CTs and one middle-income CT. The AA includes 2,718 families. After 2021, CT 9663 (Perry County) was split into two CTs designated CT 9663.01 and 9663.02. Additionally, all CTs received classification changes during the evaluation period. Prior to 2022, CT

9665 was categorized as a moderate-income CT and CT 9663 was categorized as a low-income CT. Currently, CT 9665 is categorized as a middle-income CT and CTs 9663.01 and 9663.02 are categorized as moderate-income CTs.

#### Affordable Housing Cost (2022)

According to the 2020 U.S. Census data in the table above, the median housing value is \$109,425. With the median family income of \$84,088, moderate-income families make less than \$67,270 annually and low-income families make less than \$42,044 annually. Median housing values are 1.6 times the annual income of moderate-income families and 2.6 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among these families. The 2020 U.S. Census data shows that there are 4,418 total housing units in the Columbus OH MSA AA, of which 69.3 percent are owner-occupied, 13.2 percent are occupied rentals, and 17.5 percent are vacant units. The median age of housing stock is 52 years in low-income CTs and 35 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending. Additionally, 11.4 percent of the families and 16.5 percent of the households live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

#### Job Market and Economic Conditions

The economic conditions in the Columbus OH MSA AA improved since the start of the COVID-19 pandemic and are overall stable. Unemployment rates in Hocking and Perry Counties and national unemployment rates experienced a significant increase during early 2020 but have been declining to historical normal levels since June 2021, per the Ohio Department of Job and Family Services – Bureau of Labor Market Information. The “not-seasonally adjusted” unemployment in June 2023 was consistent with the same national unemployment metric at 3.8 percent. June 2023 data indicates the unemployment rate in Hocking County is 3.5 percent and the unemployment rate in Perry County is 3.8 percent.

The 2015 U.S. Census data and D&B data as of June 2021 indicated most of the businesses in the Columbus OH MSA AA are categorized as one of these five SIC codes: Services (32.7 percent), Retail Trade (12.8 percent), Non-Classifiable Establishments (11.1 percent), Agriculture, Forestry & Fishing (7.9 percent), and Construction (12.8 percent). The remaining share of businesses comprise less than a 7 percent concentration. The 2020 U.S. Census data and D&B data as of June 2022 indicated similar distribution.

Per the Ohio Department of Job and Family Services Office of Workforce Development July 2021 Economic Profile of Hocking County, the top employers with the most online job advertisements are Hocking Valley Hospital, Amazon, and Hogan Transports. Based on 2019 data, 17.1 percent of the county is employed in Health Care and Social Assistance, 17.1 percent is employed in Accommodation and Food Service, and 14.8 percent is employed in Manufacturing. Per the Ohio Department of Job and Family Services Office of Workforce Development July 2021 Economic Profile of Perry County, the top employers with the most online job advertisements are Hogan Transports, Building Systems Transportation, and Altercare Integrated Health Services. Based on 2019 data, 19.1 percent of the county is employed in Health Care and Social Assistance, 16.1 percent are employed in Manufacturing, and 15.4 percent are employed in Educational Services.

#### Competition

Competition for deposits in the AA is strong given the number and size of financial institutions. Competition stems from local community banks and branches of larger financial institutions. According

to the June 30, 2022, Deposit Market Share Report from the Federal Deposit Insurance Corporation (FDIC), five financial institutions with eight total branches operate in Hocking County and nine financial institutions with 12 total branches operate in Perry County. FNB does not maintain a material concentration of deposits in Hocking County but held the eighth largest deposit market share in Perry County at 3.7 percent (\$17.4 million) as of June 30, 2022. FNB's primary competitors in Hocking County include The Merchants National Bank, The Vinton County National Bank, PNC Bank, and The Park National Bank who hold a combined 92 percent of the deposit market share, totaling \$434.1 million in deposits. FNB's primary competitors in Perry County include Peoples State Bank, The Community Bank, Commodore Bank, PNC Bank, and The Park National Bank who hold a combined 77.7 percent of the deposit market share, totaling \$362.2 million in deposits.

Strong competition for home mortgage loans also exists. Per 2021 Peer Mortgage Data and 2015 U.S. Census data, FNB held the 29th largest home mortgage market share in the Columbus OH MSA AA at 0.9 percent by total number and 0.5 percent by total dollar amount. Other key competitors included The Park National Bank, Peoples State Bank, Rocket Mortgage, The Vinton County National Bank, and PNC Bank who hold a combined 31.2 percent of home mortgage market share by total number and 29.3 percent by total dollar amount. By comparison, per 2022 Peer Mortgage Data and 2020 U.S. Census data, FNB held the 15th largest home mortgage market share at 1.8 percent by total number and 1.2 percent by total dollar amount. Key competitors were similar, with Huntington National Bank replacing Rocket Mortgage, and held a combined 32 percent of home mortgage market share by total number of and 26.8 percent by total dollar amount.

## **Scope of Evaluation in Ohio**

The OCC performed a full-scope review of the Ohio Non-MSA AA and the Columbus-OH MSA AA. The data in the AAs were analyzed and presented as two AAs for the purposes of this evaluation. Home mortgage is the bank's primary lending product and was evaluated under the Lending Test. As discussed above, the OCC used HMDA data for 2020, 2021, and 2022 for the home mortgage loan analysis.

The rating is based on performance in the Ohio Non-MSA AA and the Columbus-OH MSA AA. By the number of loans originated, home mortgage loans represent 19.7% of all loans made over the three-year evaluation period, but the average non-mortgage loan is much smaller in dollar amount than the average mortgage loan. Home mortgage loans represent the majority of loan originations by dollar volume during the evaluation period. Further, mortgage loans are generally considered more impactful to consumers. The Non-MSA AA was weighted heavier than the Columbus MSA AA given not enough loans were made during the full evaluation period to provide meaningful analysis of lending in the Columbus MSA AA. Additionally, there are only two CTs in the Columbus MSA AA in 2020 and 2021, and three CTs in the Columbus MSA AA in 2022.

## **Lending Test**

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

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

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

As of the 2015 census, there were no low-income CTs and four moderate-income CTs in the Ohio Non-MSA AA. The other four CTs in the AA were middle-income. As of the 2020 census, there are no low-income and six moderate-income CTs within the Ohio Non-MSA AA. The other three CTs in the AA were middle-income. There are five branch locations within the Ohio Non-MSA AA during the evaluation period. In 2020 and 2021, the bank had four CTs that were designated as distressed. Two CTs (9727 and 9728) experienced high poverty levels and two CTs (9688 and 9690) experienced high unemployment levels. In 2022, the bank had one CT (9734) that was designated as distressed with high poverty levels.

As of the 2015 census, there was one low-income and one moderate-income CT in the Columbus MSA AA. FNB made loans in each of the two CTs during the evaluation period. As of the 2020 census, there are no low-income and two moderate-income CTs within the Columbus MSA AA. There is one branch (Junction City) location within the Columbus MSA AA. There were no CTs within the Columbus MSA AA that were designated as distressed or underserved over the evaluation period.

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

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

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies.

#### Ohio Non-MSA AA

For 2020 and 2021, the bank exhibits reasonable geographic distribution of home mortgage loans in the Ohio Non-MSA AA. The percentage of home mortgage loans originated by the bank in moderate-income CTs is slightly below the demographic comparator and aggregate lending data of other HMDA reporters, but reasonable considering the geographic factors listed above. There are no low-income CTs in the AA in 2020 and 2021.

For 2022, the bank exhibits reasonable geographic distribution of home mortgage loans in the Ohio Non-MSA AA. The percentage of home mortgage loans originated by the bank in moderate-income CTs is slightly below the demographic comparator and aggregate lending data of other HMDA reporters, but reasonable considering the geographic factors listed above. There are no low-income CTs in the AA in 2022.

#### Columbus MSA AA

The OCC did not perform an analysis of the geographic distribution of loans in the Columbus MSA AA. The bank's Columbus MSA AA includes two CTs in 2020 and 2021, and three CTs in 2022. While the CTs contain low- and moderate-income geographies, the bank only originated ten loans over the full evaluation period within these geographies, so a review of the geographic distribution of loans would not be meaningful.

### ***Lending Gap Analysis***

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

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

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

The OCC compared the percentage of home mortgage loans originated or purchased by FNB to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

### ***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.

#### Ohio Non-MSA AA

For 2020 and 2021, the bank exhibits reasonable distribution of home mortgage loans by income level of the borrower in the Ohio Non-MSA AA. The bank's percentage of home mortgage loans to low- and moderate-income borrowers is slightly below aggregate data of other HMDA reporters and below demographic data. The OCC considered other factors in the bank's performance during the evaluation period, including strong competition, households below the poverty level (26 percent in the AA), and the cost of homeownership in the AA. The overall median housing values were almost twice the weighted average of the median family income of moderate-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to moderate-income families. Approximately 26 percent of the families in this AA live below the poverty level.

For 2022, the bank exhibits reasonable distribution of home mortgage loans by income level of the borrower in the Ohio Non-MSA AA. The bank's percentage of home mortgage loans to low-income borrowers is slightly below aggregate data of other HMDA reporters and below demographic data. However, the bank's percentage of home mortgage loans to moderate-income borrowers exceeds both the demographic and aggregate data, making lending to LMI borrowers reasonable overall. Similar to 2020 and 2021, the OCC considered other factors in the bank's performance in 2022, including high competition, households below the poverty level (23.2 percent in the AA), and the cost of homeownership in the AA. As stated above, overall median housing values are 1.8 times the annual income of moderate-income families and 2.9 times the annual income of low-income families, creating an obstacle to homeownership.

#### Columbus MSA AA

The OCC did not perform an analysis of the distribution of loans by income level of the borrower in the Columbus MSA AA. The bank's Columbus MSA AA includes two CTs in 2020 and 2021, and three CTs in 2022. While the bank originated home mortgage loans to low-income borrowers, the bank only



originated ten loans in this AA over the full evaluation period, so a review of the distribution of loans by income level of the borrower would not be meaningful.

### **Responses to Complaints**

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

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2020 to 12/31/2022	
<b>Bank Products Reviewed:</b>	Home mortgage loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None.		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Ohio</b>		
Columbus OH MSA AA	Full-scope	For 2020 and 2021: The Columbus, OH MSA AA contains CTs 9655 and 9663 (Hocking and Perry counties).  For 2022: The Columbus, OH MSA AA contains CTs 9655 and 9663.01 and 9663.02 (Hocking and Perry counties)
OH Non-MSA AA	Full-scope	For 2020 through 2022: The OH Non-MSA AA contains CTs 9688, 9689, 9690, 9691, 9726, 9727, 9728, and 9734 (Athens and Morgan counties).

## Appendix B: Summary of MMSA and State Ratings

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RATINGS: THE FIRST NATIONAL BANK OF MCCONNELSVILLE	
Overall Bank:	Lending Test Rating
The First National Bank of McConnelsville	<b>Satisfactory</b>
State:	
Ohio	<b>Satisfactory</b>

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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



- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Columbus OH MSA AA	5	441	2.7	279	61.2	20.0	59.9	38.8	80.0	40.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
OH Non-MSA AA	183	23,087	97.3	606	0.0	0.0	0.0	48.7	48.1	49.3	51.3	51.9	50.7	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>188</b>	<b>23,528</b>	<b>100.0</b>	<b>885</b>	<b>16.1</b>	<b>0.9</b>	<b>18.9</b>	<b>46.1</b>	<b>48.9</b>	<b>46.4</b>	<b>37.8</b>	<b>50.5</b>	<b>34.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA 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																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Columbus OH MSA AA	5	488	10.0	218	0.0	0.0	0.0	55.6	20.0	65.6	44.4	80.0	34.4	0.0	0.0	0.0	0.0	0.0	0.0
OH Non-MSA AA	45	4,919	90.0	445	0.0	0.0	0.0	76.0	75.6	80.0	24.0	24.4	20.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>50</b>	<b>5,407</b>	<b>100.0</b>	<b>663</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>70.5</b>	<b>70.0</b>	<b>75.3</b>	<b>29.5</b>	<b>30.0</b>	<b>24.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2020-21</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbus OH MSA AA	5	441	2.7	279	45.9	20.0	11.8	20.9	0.0	26.9	19.1	20.0	20.1	14.2	60.0	25.8	0.0	--	15.4
OH Non-MSA AA	183	23,087	97.3	606	29.8	6.0	8.4	19.2	16.9	17.8	20.7	26.8	22.8	30.3	35.0	31.5	0.0	15.3	19.5
<b>Total</b>	<b>188</b>	<b>23,528</b>	<b>100.0</b>	<b>885</b>	<b>34.0</b>	<b>6.4</b>	<b>9.5</b>	<b>19.7</b>	<b>16.5</b>	<b>20.7</b>	<b>20.3</b>	<b>26.6</b>	<b>21.9</b>	<b>26.1</b>	<b>35.6</b>	<b>29.7</b>	<b>0.0</b>	<b>14.9</b>	<b>18.2</b>

*Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2022</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbus OH MSA AA	5	488	10.0	218	24.9	40.0	17.4	23.8	20.0	30.7	32.1	0.0	21.6	19.2	20.0	18.3	0.0	20.0	11.9
OH Non-MSA AA	45	4,919	90.0	445	30.4	8.9	10.6	22.1	26.7	23.6	21.7	22.2	23.4	25.8	31.1	23.8	0.0	11.1	18.7
<b>Total</b>	<b>50</b>	<b>5,407</b>	<b>100.0</b>	<b>663</b>	<b>29.0</b>	<b>12.0</b>	<b>12.8</b>	<b>22.5</b>	<b>26.0</b>	<b>25.9</b>	<b>24.4</b>	<b>20.0</b>	<b>22.8</b>	<b>24.1</b>	<b>30.0</b>	<b>22.0</b>	<b>0.0</b>	<b>12.0</b>	<b>16.4</b>

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

