



## **PUBLIC DISCLOSURE**

February 1, 2021

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

The First National Bank of Bellevue  
Charter Number 2302

120 North Street  
Bellevue, OH 44811

Office of the Comptroller of the Currency

200 Public Square Suite 1610  
Cleveland, OH 44114-2241

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

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## Overall CRA Rating

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

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

The major factors that support this rating include:

- The Lending Test is satisfactory based on the reasonable distribution of home mortgage loans to borrowers of different income levels and small loans to businesses of different sizes in Ohio.
- A substantial majority of the bank's loans are inside its assessment areas (AAs).
- The bank's loan-to-deposit ratio (LTD) is more than reasonable.

### Loan-to-Deposit Ratio

Considering The First National Bank of Bellevue's (The FNBB or bank) size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable.

The FNBB's LTD ratio is calculated on a bank-wide basis and meets the standard for outstanding performance. During the evaluation period, the bank's quarterly average LTD ratio was 92.3 percent, with quarterly ratios ranging from a low of 85.6 percent in the third quarter of 2017, to a high of 97.4 percent in the fourth quarter of 2018. In comparison, the quarterly average LTD ratio for other banks of similar asset size ranged between 44.0 percent to 103.5 percent. The FNBB's quarterly average LTD ratio ranked second highest among peers.

### Lending in Assessment Areas

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

During the evaluation period, the bank originated and purchased 93.3 percent by number, and 71.7 percent by dollar amount of its total loans inside the bank's AAs. This analysis is performed at the bank level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Areas</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	322	90.2	35	9.8	357	41,888	87.9	5,785	12.1	47,673
Small Business	1458	94.1	92	5.9	1550	96,156	66.4	48,625	33.6	144,781
Total	1780	93.3	127	6.7	1907	138,044	71.7	54,410	28.3	192,454

## Description of Institution

The FNBB is a full-service intrastate, federally chartered community bank headquartered in Bellevue, Ohio. The bank operates eight full-service branches. During our evaluation period, the Fremont branch was opened and began operations in June of 2017. The bank is a wholly owned subsidiary of First Bancshares Inc., a one-bank holding company that also operates an affiliate, First Bellevue Properties Inc., which holds the bank's other real estate owned properties. As of December 31, 2019, the bank's assets totaled \$227.0 million and tier one capital totaled \$24.0 million or 9.4 percent of total assets. The bank services all of Sandusky and Huron counties, and portions of Erie, Ottawa, and Seneca counties. For 2017 and 2018, the bank had one AA, the Ohio Non-Metropolitan Statistical Area (MSA) consisting of these counties. The Office of Management and Budget (OMB) made MSA delineation changes that impacted the bank's AA during the evaluation period. Effective in 2019, Ottawa County census tracts (CTs) were moved to the Toledo, Ohio MSA (referred to as the Toledo MSA). As a result, the bank now has two AAs, the Ohio Non-MSA and Toledo MSA.

The FNBB's primary loan product is residential real estate loans, but it does offer customers a range of loan products including home mortgage, consumer, commercial, agricultural, and municipal loans. The bank also offers checking, savings, time deposit, and business accounts. From January 1, 2017, to December 31, 2019, the bank's loan portfolio grew 15.3 percent to \$181.8 million. As of December 31, 2019, the loan portfolio was comprised of real estate loans (\$143.1 million or 77.8 percent), commercial and industrial loans (\$34.4 million or 18.7 percent), individual loans (\$3.8 million or 2.0 percent), and agricultural loans (\$2.7 million or 1.5 percent).

Please refer to the "Description of the Institution's Operations in Ohio" section for additional information.

There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AAs. The bank received a rating of "Satisfactory" as a result of the prior Community Reinvestment Act (CRA) performance evaluation, dated September 26, 2016.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's record of meeting the credit needs of its AAs. We performed our evaluation using Small Bank CRA examination procedures. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its home mortgage lending and small loans to business activities. The evaluation period for lending activity covers January 1, 2017 to December 31, 2019. Prior to the evaluation, we tested the accuracy of the bank's reported Home Mortgage Disclosure Act and small business loan data. We determined the information to be accurate.

Due to the MSA changes made by OMB, the bank now has two AAs. As a result, we performed three separate analyses: 2017-2018 Ohio Non-MSA, 2019 Ohio Non-MSA (without Ottawa County), and 2019 Toledo MSA (Ottawa County).

Based on the bank's internal reports for lending activity and discussions with senior management, we determined that the bank's primary lending focus during the evaluation period was home mortgage loans and small loans to businesses. We evaluated the bank's lending performance based on these primary

loan products. While the bank offers other products, such as consumer and agricultural loans, these products are not a primary lending focus. As a result, we did not consider these as part of our evaluation, as an analysis of this data would not be meaningful.

Given the evaluation period end date of December 31, 2019, qualifying activities performed in response to the COVID-19 pandemic were not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

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

All of the bank's AAs are in the state of Ohio. We selected the Ohio Non-MSA and Toledo MSA AAs for full-scope reviews and conducted three separate analyses. Refer to *Appendix A - Scope of Examination*, for more information.

### **Ratings**

The bank's overall rating is based on performance within its AAs. The state of Ohio rating is based on the performance within the bank's AAs that received full-scope reviews. In determining our ratings, we weighed demographic factors of the AAs that could affect the bank's ability to lend. As a result, we placed greater emphasis on the distribution of loans to borrowers of different income levels and the distribution of small loans to businesses of different sizes.

### **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 (or any affiliate whose loans have been considered as part of the institution'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 institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Ohio

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

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The bank's distribution of home mortgage loans and small loans to businesses reflects a reasonable distribution to borrowers of different income levels and business of different sizes.
- A substantial majority of the bank's loans are inside its AAs.
- The bank's LTD ratio is more than reasonable.

### Description of Institution's Operations in Ohio

The FNBB offers traditional banking products and services, including conventional fixed and adjustable rate residential mortgages and home equity loans. The bank's loan products include home mortgage, consumer, commercial, agricultural, and municipal loans. The bank also offers a range of deposit products and services, including checking, savings, certificates of deposits, IRA, health savings accounts, and safe deposit boxes. The bank also provides alternative delivery channels, which includes online banking, mobile banking, mobile deposit, online bill pay, and person-2-person payments.

Seven of the bank's eight branch locations are open Monday through Saturday and offer drive-through services. These seven branches offer the same service hours. The Put-In-Bay branch is located on an island and offers seasonal hours to align with seasonal tourism. Non-deposit taking automated teller machines (ATMs) are located at each branch and offer 24-hour accessibility. None of the branch locations are located within a low-income CT. Based on 2015 American Census Survey (ACS) data, the Bellevue (main office), Catawba, Clyde, Port Clinton, and Sandusky branches are located in middle-income CTs. The Fremont Branch is situated in a moderate-income CT, and the Put-In-Bay branch is situated in an upper-income CT. During the evaluation period, no branches were closed. The Fremont branch is also adjacent to one other moderate-income CT. The branches provide reasonable accessibility to individuals located in moderate-income CTs. Due to OMB changes effective in 2019, the Catawba, Port Clinton, and Put-In-Bay branches are part of the new Toledo MSA AA.

#### **Ohio Non-MSA AA (2017-2018)**

For the years 2017 and 2018, the Ohio Non-MSA consists of 57 CTs in northwest Ohio. According to 2015 ACS data, the Ohio Non-MSA for these two years, consists of 57 contiguous CTs, with 16 upper-income, 33 middle-income, eight moderate-income, and no low-income CTs. The AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies.

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

For 2017 and 2018, the local economy improved with unemployment trends decreasing. However, the unemployment rates for the bank's AA exceed both state and national averages. According to the U.S. Department of Labor's Bureau of Labor Statistics database, the unadjusted average annual unemployment rate for Erie, Huron, Ottawa, Sandusky, and Seneca Counties declined from an average of 5.8 percent in 2017 to 5.3 percent in 2018. For the same period, the state-wide unemployment rate fell from 5.0 percent to 4.5 percent. According to 2018 Dun & Bradstreet (D&B) data, 78.2 percent of businesses within the Ohio Non-MSA for 2018 have less than \$1 million in gross annual revenues and 63.2 percent of businesses have fewer than five employees. Only 2.7 percent of businesses with gross revenues under \$1 million are headquartered in the AA. Major employers in the AA include First Energy, Heinz, Whirlpool, Ford Motor Company, Cedar Fair, and Pepperidge Farm.

Competition for loans and deposits within the AA is significant and institutions consist of a mix of large national banks, state banks, credit unions, and mortgage lenders. According to the June 30, 2018, FDIC-Insured Institutions Deposit Market Share Report, there are 22 FDIC-insured institutions operating 108 offices in the AA. The bank improved their deposit market share percentage from 3.7 percent in 2017 to 4.0 percent in 2018, resulting in an overall ranking of tenth for 2018 in the AA. The top five institutions for deposit market share includes Civista Bank, The Croghan Colonial Bank, KeyBank, PNC Bank, and Huntington Bank. Combined, these five institutions represent 54.2 percent of the deposit market share for 2018. Based on the 2018 peer mortgage data, the bank's lending market share improved since 2017, resulting in the bank ranking eleventh out of 245 lenders. The top ten lenders represent 49.9 percent of the market's mortgage lending.

**Table A – Demographic Information of the Assessment Area**

**Assessment Area: Ohio Non-MSA AA 2017-2018**

<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)	57	0.0	14.0	57.9	28.1	0.0
Population by Geography	224,154	0.0	12.7	60.7	26.6	0.0
Housing Units by Geography	111,341	0.0	12.1	58.8	29.0	0.0
Owner-Occupied Units by Geography	65,123	0.0	9.1	60.5	30.5	0.0
Occupied Rental Units by Geography	25,115	0.0	24.1	59.8	16.1	0.0
Vacant Units by Geography	21,103	0.0	7.4	52.7	40.0	0.0
Businesses by Geography	12,141	0.0	13.5	57.5	29.0	0.0
Farms by Geography	940	0.0	2.6	58.0	39.5	0.0
Family Distribution by Income Level	60,365	17.5	18.0	21.4	43.2	0.0
Household Distribution by Income Level	90,238	20.5	15.9	19.1	44.5	0.0
Median Family Income Non-MSAs - OH		\$56,217	Median Housing Value			\$130,609
			Median Gross Rent			\$666
			Families Below Poverty Level			9.7%

Source: 2015 ACS and 2018 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.

**Ohio Non-MSA AA (2019)**

According to 2015 ACS data, the 2019 Ohio Non-MSA contains 47 contiguous CTs, with 12 upper-income, 27 middle-income, eight moderate-income and no low-income CTs. The AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies.

The local economy continued to improve throughout 2019. However, the 2019 unemployment rates for the bank's AA continued to exceed both state and national averages. According to the U.S. Department of Labor's Bureau of Labor Statistics database, the unadjusted average annual unemployment rate for Erie, Huron, Sandusky, and Seneca Counties declined from an average of 5.1 percent in 2018 to 4.8 percent in 2019. For the same time period, the state-wide unemployment rate fell from 4.5 percent to 4.1 percent. Major employers within the AA for 2019 remain unchanged. According to 2019 D&B data, 79.2 percent of businesses within the Ohio Non-MSA have less than \$1 million in gross annual revenues and 63.7 percent of businesses have fewer than five employees. Only 2.6 percent of businesses with gross revenues under \$1 million are headquartered in the AA.

For 2019, competition within the AA remained significant and relatively unchanged from 2018, with 22 FDIC-insured institutions operating 108 offices. The June 30, 2019, FDIC-Insured Institutions Deposit Market Share Report shows the bank with a 3.9 percent deposit market share. Competition for deposits remains relatively stable, with the top five institutions holding 53.2 percent of the deposit market share in 2019. Based on the 2019 peer mortgage data, the bank ranked fifteenth out of 228 lenders with a market share of 1.6 percent. The top ten lenders represent 51.4 percent of the market's mortgage lending.

**Table A – Demographic Information of the Assessment Area****Assessment Area: Ohio Non-MSA AA 2019**

<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)	47	0.0	17.0	57.4	25.5	0.0
Population by Geography	197,430	0.0	14.5	58.7	26.8	0.0
Housing Units by Geography	89,150	0.0	15.2	57.9	26.9	0.0
Owner-Occupied Units by Geography	55,955	0.0	10.5	58.8	30.6	0.0
Occupied Rental Units by Geography	22,383	0.0	27.1	57.7	15.2	0.0
Vacant Units by Geography	10,812	0.0	14.4	53.7	31.9	0.0
Businesses by Geography	10,783	0.0	15.9	54.6	29.5	0.0
Farms by Geography	856	0.0	2.8	55.8	41.4	0.0
Family Distribution by Income Level	52,464	17.6	17.9	21.3	43.2	0.0
Household Distribution by Income Level	78,338	21.0	15.7	18.9	44.4	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$121,273
			Median Gross Rent			\$659
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS and 2019 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>						

**Toledo MSA AA (2019)**

The Toledo MSA AA (Ottawa County) contains 10 contiguous CTs. The AA does not contain any low- or moderate-income CTs and has three upper- and seven middle-income CTs. The AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies. The bank has three branches that moved from the Ohio Non-MSA to the Toledo MSA (Ottawa County) effective in 2019, these branches include the Catawba, Port Clinton, and Put-In-Bay. The Catawba and Port Clinton branches are located in middle-income CTs, whereas the Put-In-Bay branch is located in an upper-income CT.

In 2019, the local economy within this AA improved with unemployment trends decreasing. However, similar to the Ohio Non-MSA, unemployment rates for this AA exceed both state and national averages. According to the U.S. Department of Labor's Bureau of Labor Statistics database, the unadjusted average annual unemployment rate for the Toledo MSA AA (Ottawa County) declined from 6.3 percent in 2018 to 5.6 percent for 2019. For the same period, the state-wide unemployment rate fell from 4.5 percent to 4.1 percent. According to 2019 D&B data, 81.4 percent of businesses within the Toledo MSA AA (Ottawa County) have less than \$1 million in gross annual revenues and 62.8 percent of businesses have fewer than five employees. Only 2.4 percent of businesses are headquartered in the AA. Major employers in the AA include Davis Besse Nuclear Power Plant, Materion Brush, Inc., Magruder Hospital, United States Gypsum Company, and ACPO, LTD.

Competition within the Toledo MSA AA (Ottawa County) is significant and consists of a mix of large national banks, state banks, credit unions, and mortgage lenders. Based on the 2019 peer mortgage data, the bank ranks seventh with a market share of 3.8 percent. There are 167 lenders in the AA and the top five lenders represent 37.3 percent of the market's mortgage lending.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Toledo MSA 2019</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)	10	0.0	0.0	70.0	30.0	0.0
Population by Geography	26,724	0.0	0.0	84.3	15.7	0.0
Housing Units by Geography	22,191	0.0	0.0	76.8	23.2	0.0
Owner-Occupied Units by Geography	9,168	0.0	0.0	81.4	18.6	0.0
Occupied Rental Units by Geography	2,732	0.0	0.0	87.0	13.0	0.0
Vacant Units by Geography	10,291	0.0	0.0	70.0	30.0	0.0
Businesses by Geography	2,110	0.0	0.0	81.6	18.4	0.0
Farms by Geography	97	0.0	0.0	79.4	20.6	0.0
Family Distribution by Income Level	7,901	16.9	18.2	21.8	43.1	0.0
Household Distribution by Income Level	11,900	17.4	17.0	20.4	45.2	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$60,742	Median Housing Value			\$168,114
			Median Gross Rent			\$727
			Families Below Poverty Level			8.5%

*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.*

We considered information obtained from two community contacts in order to obtain an understanding of the AAs financial needs and credit opportunities. Areas of opportunities include financial literacy volunteers and programs, along with small dollar loan programs and grants for auto purchases and repairs for low- to moderate-income clients. Additional opportunities exist to provide for homeownership counseling, funding for mental health resources and treatment, transportation programs, down payment assistance, and general operating support.

## **Scope of Evaluation in Ohio**

All of bank's AAs are in the state of Ohio. We completed three separate analyses: 2017-2018 Ohio Non-MSA, 2019 Ohio Non-MSA (without Ottawa County), and 2019 Toledo MSA (Ottawa County). In determining our ratings, we weighed demographic factors of the AAs that could affect the bank's ability to lend. These factors include significant competition from larger institutions, the number of low- and moderate-income CTs, branch presence, and location of the majority of owner-occupied housing. As a result, we placed greater emphasis on the distribution of loans to borrowers of different income levels and the distribution of small loans to businesses of different sizes. In addition, we also gave more consideration to the Ohio Non-MSA AA when determining our rating given the inclusion of this AA for the full evaluation period, whereas the Toledo MSA AA covered only one year. Refer to *Appendix A - Scope of Examination*, for more information.

For comparative purposes, we considered the demographic percentage of owner-occupied housing units and families in low- and moderate-income geographies, as well as aggregate bank geographic distribution data in the AAs. Additional sources of information included 2015 ACS data, internal bank records, deposit market share data, information from community contacts, and information from government websites regarding the characteristics and economy of the bank's AAs.

## **LENDING TEST**

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

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Ohio Non-MSA and Toledo MSA (Ottawa County) is good.

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

The bank exhibits very poor geographic distribution of loans in the State.

In determining our ratings, we considered demographic factors of the AAs that could affect the bank's ability to lend. These factors include competition from larger institutions, the lack of low-income CTs, the limited number of moderate-income CTs, area demographics, and the location of the majority of owner-occupied housing. For instance, better lending opportunities exist in upper- and middle-income CTs within the bank's AAs. According to the 2015 ACS, for the Ohio Non-MSA AA, on average the combined owner-occupied housing units for middle- and upper-income CTs is approximately 90 percent. Additionally, within the Ohio Non-MSA AA for 2017-2018, 24.1 percent of housing units in

moderate-income CTs were renter-occupied, while 7.4 percent of housing units were vacant. In 2019, 27.1 percent of housing units in moderate-income CTs were renter-occupied, and 14.4 percent of housing units were vacant. The Toledo MSA AA (Ottawa County) has no low- or moderate-income CTs.

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

The bank's overall distribution of home mortgage loans among geographies of different income levels throughout the AAs is poor. 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.

#### Ohio Non-MSA (2017-2018)

The bank's distribution of home mortgage loans among geographies of different income levels in the Ohio Non-MSA during 2017-2018 is poor. There were no low-income CTs during 2017-2018. The bank's percentage of home mortgage loans among geographies of moderate-income CTs in the AA was 2.9 percent. This is significantly below the 9.1 percent of the AAs owner-occupied housing units in moderate-income geographies and significantly below the 8.7 percent aggregate bank lending.

#### Ohio Non-MSA (2019)

The bank's distribution of home mortgage loans among geographies of different income levels in the Ohio Non-MSA in 2019 is poor. There were no low-income CTs during 2019 in the Ohio Non-MSA. The bank's percentage of home mortgage loans among geographies of moderate-income CTs in the AA was 5.6 percent. This percentage is below the 10.5 percent for owner-occupied housing units in moderate-income geographies and aggregate bank lending.

#### Toledo MSA (2019)

We did not perform an analysis for the Toledo MSA as there were no low- or moderate-income CTs in the bank's AA.

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

The bank's overall distribution of small loans to businesses among geographies of different income levels throughout the AAs is very poor. 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.

#### Ohio Non-MSA (2017-2018)

The bank's distribution of small loans to businesses among geographies of different income levels in the Ohio Non-MSA during 2017-2018 is very poor. There were no low-income CTs during 2017-2018. The bank's percentage of small loans to businesses among geographies of moderate-income CTs was 2.0 percent. This is significantly below the 13.5 percent of businesses in moderate-income CT geographies and significantly below the 12.2 percent aggregate bank lending.

#### Ohio Non-MSA (2019)

The bank's distribution of small loans to businesses among geographies of different income levels in the Ohio Non-MSA in 2019 is very poor. There were no low-income CTs during 2019. The bank's percentage of small loans to businesses among geographies of moderate-income CTs was 1.9 percent.

This is significantly below the 15.9 percent of businesses in moderate-income CT geographies and significantly below the 13.7 percent aggregate bank lending.

#### Toledo MSA (2019)

We did not perform an analysis for the Toledo MSA as there were no low- or moderate-income CTs in the bank's AA.

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

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

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

Refer to Table P in the state of Ohio section of *Appendix D*, for the facts and data used to evaluate the distribution of home mortgage loan originations and purchases to borrowers of different income levels. The bank's overall distribution of home mortgage loans to borrowers of different income levels throughout the AAs is reasonable.

#### Ohio Non-MSA (2017-2018)

The bank's distribution of home mortgage loans to borrowers of different income levels during 2017-2018 in the Ohio Non-MSA is reasonable. FNBB's percentage of home mortgage loans to low-income borrowers was 5.7 percent. This is significantly below the 17.5 percent of low-income families living in the AA but only slightly below the 7.0 percent aggregate bank lending. However, the bank's percentage of home mortgage loans to moderate-income borrowers of 19.0 percent was above the 18.0 percent of moderate-income families living in the AA.

#### Ohio Non-MSA (2019)

The bank's distribution of home mortgage loans to borrowers of different income levels during 2019 in the Ohio Non-MSA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 8.5 percent. This percentage was significantly below the 17.6 percent of low-income families living in the AA. However, the 8.5 percent was higher than the aggregate bank lending of 6.1 percent. For home mortgage loans to moderate-income borrowers the bank's percentage was 21.1. This percentage is above the 17.9 percent of moderate-income families living in the AA, and slightly above the aggregate bank lending of 20.3 percent.

#### Toledo MSA (2019)

The bank's distribution of home mortgage loans to borrowers of different income levels during 2019 in the Toledo MSA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers in the Toledo MSA was 9.8 percent. This was significantly below the 16.9 percent of low-income families living in the AA; however, it was significantly higher than the aggregate bank lending of 4.9 percent. The bank's 14.6 percent for home mortgage loans to moderate-income borrowers was below the 18.2 percent of moderate-income families living in the AA, but slightly above the aggregate bank lending of 13.2 percent.

### ***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 distribution of the bank's originations and purchases of small loans to businesses. The bank's overall distribution of small loans to businesses throughout the AAs is reasonable.

#### Ohio Non-MSA (2017-2018)

The bank's distribution of small loans to businesses among businesses of different sizes in the Ohio Non-MSA during 2017-2018 is reasonable. The bank's percentage of small loans to businesses with revenues less than \$1 million was 49.0 percent. This is significantly below the 77.1 percent of businesses with revenues less than \$1 million in the AA, but higher than the 45.4 percent of aggregate bank lending.

#### Ohio Non-MSA (2019)

The bank's distribution of small loans to businesses among businesses of different sizes during 2019 in the Ohio Non-MSA is reasonable. The bank's percentage of small loans to businesses with revenues less than \$1 million was 41.5 percent. This is significantly below the 78.0 percent of businesses with revenues less than \$1 million in the AA, and slightly lower than the 47.5 percent of aggregate bank lending.

#### Toledo MSA (2019)

The bank's distribution of small loans to businesses among businesses of different sizes during 2019 in the Toledo MSA is reasonable. The bank's percentage of small loans to businesses with revenues less than \$1 million was 71.4 percent. This is below the 81.0 percent of businesses with revenues less than \$1 million in the AA, but significantly higher than the 45.3 percent of aggregate bank lending.

### **Responses to Complaints**

The bank has not received any complaints pertaining to CRA during the evaluation period.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2017 to 12/31/2019	
<b>Bank Products Reviewed:</b>	Home mortgage and small business	
<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>
Ohio		
Ohio Non-MSA 2017-2018	Full Scope	AA Consists of 57 CTs in the counties of Erie, Ottawa, Seneca, Sandusky, and Huron.
Ohio Non-MSA 2019	Full Scope	AA Consists of 47 CTs in the counties of Erie, Seneca, Sandusky, and Huron.
Toledo, OH MSA # 45780 2019	Full Scope	Limited to ten CTs in Ottawa County: 501, 502.01, 502.02, 503.01, 503.02, 505, 506, 507, 508, 512

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	First National Bank of Bellevue
Overall Bank:	Lending Test Rating
First National Bank of Bellevue	Satisfactory
State:	
Ohio	Satisfactory

## 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.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2017-2018</b>	
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		
Ohio Non-MSA	210	26,808	100.0	5,049	0.0	0.0	0.0	9.1	2.9	8.7	60.5	61.9	55.4	30.5	35.2	35.8	0.0	0.0	0.0		
<b>Total</b>	<b>210</b>	<b>26,808</b>	<b>100.0</b>	<b>5,049</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>9.1</b>	<b>2.9</b>	<b>8.7</b>	<b>60.5</b>	<b>61.9</b>	<b>55.4</b>	<b>30.5</b>	<b>35.2</b>	<b>35.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2019</b>	
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		
Toledo MSA	41	5,775	36.6	1,077	0.0	0.0	0.0	0.0	0.0	0.0	81.4	70.7	73.7	18.6	29.3	26.3	0.0	0.0	0.0		
Ohio Non-MSA	71	9,305	63.4	4,330	0.0	0.0	0.0	10.5	5.6	10.5	58.8	71.8	53.5	30.6	22.5	36.0	0.0	0.0	0.0		
<b>Total</b>	<b>112</b>	<b>15,080</b>	<b>100.0</b>	<b>5,407</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>9.1</b>	<b>3.6</b>	<b>8.4</b>	<b>62.0</b>	<b>71.4</b>	<b>57.6</b>	<b>28.9</b>	<b>25.0</b>	<b>34.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2015 ACS Census; 01/01/2019 - 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 2017-2018**

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
Ohio Non-MSA	210	26,808	100.0	5,049	17.5	5.7	7.0	18.0	19.0	20.7	21.4	18.6	22.1	43.2	53.3	38.2	0.0	3.3	12.0
<b>Total</b>	<b>210</b>	<b>26,808</b>	<b>100.0</b>	<b>5,049</b>	<b>17.5</b>	<b>5.7</b>	<b>7.0</b>	<b>18.0</b>	<b>19.0</b>	<b>20.7</b>	<b>21.4</b>	<b>18.6</b>	<b>22.1</b>	<b>43.2</b>	<b>53.3</b>	<b>38.2</b>	<b>0.0</b>	<b>3.3</b>	<b>12.0</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

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

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
Toledo MSA	41	5,775	36.6	1,077	16.9	9.8	4.9	18.2	14.6	13.2	21.8	14.6	17.4	43.1	58.5	55.2	0.0	2.4	9.4
Ohio Non-MSA	71	9,305	63.4	4,330	17.6	8.5	6.1	17.9	21.1	20.3	21.3	23.9	25.3	43.2	46.5	34.8	0.0	0.0	13.5
<b>Total</b>	<b>112</b>	<b>15,080</b>	<b>100.0</b>	<b>5,407</b>	<b>17.5</b>	<b>8.9</b>	<b>5.8</b>	<b>18.0</b>	<b>18.8</b>	<b>18.9</b>	<b>21.4</b>	<b>20.5</b>	<b>23.7</b>	<b>43.2</b>	<b>50.9</b>	<b>38.9</b>	<b>0.0</b>	<b>0.9</b>	<b>12.7</b>

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017-2018</b>		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Ohio Non-MSA	975	96,156	100	2,977	0.0	0.0	0.0	13.5	2.0	12.2	57.5	71.3	54.1	29.0	26.6	33.8	0.0	--	0.0		
<b>Total</b>	<b>975</b>	<b>96,156</b>	<b>100</b>	<b>2,977</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>13.5</b>	<b>2.0</b>	<b>12.2</b>	<b>57.5</b>	<b>71.3</b>	<b>54.1</b>	<b>29.0</b>	<b>26.6</b>	<b>33.8</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>		

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2019</b>		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Toledo MSA	14	4,231	2.9	481	0.0	0.0	0.0	0.0	0.0	0.0	81.6	78.6	75.9	18.4	21.4	24.1	0.0	--	0.0		
Ohio Non-MSA	469	15,765	97.1	2,557	0.0	0.0	0.0	15.9	1.9	13.7	54.6	66.1	52.3	29.5	32.0	33.9	0.0	--	0.0		
<b>Total</b>	<b>483</b>	<b>19,996</b>	<b>100.0</b>	<b>3,038</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>13.3</b>	<b>1.9</b>	<b>11.6</b>	<b>59.0</b>	<b>66.4</b>	<b>56.1</b>	<b>27.7</b>	<b>31.7</b>	<b>32.4</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>		

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017-2018</b>	
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	
Ohio Non-MSA	975	96,156	100	2,977	77.1	49.0	45.4	6.8	50.9	16.1	0.0	
<b>Total</b>	<b>975</b>	<b>96,156</b>	<b>100</b>	<b>2,977</b>	<b>77.1</b>	<b>49.0</b>	<b>45.4</b>	<b>6.8</b>	<b>50.9</b>	<b>16.1</b>	<b>0.0</b>	
<i>Source: 2018 D&amp;B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2019</b>	
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	
Toledo MSA	14	4,231	2.9	481	81.0	71.4	45.3	5.4	28.6	13.6	0.0	
Ohio Non-MSA	469	15,765	97.1	2,557	78.0	41.5	47.5	6.6	58.5	15.4	0.0	
<b>Total</b>	<b>483</b>	<b>19,996</b>	<b>100</b>	<b>3,038</b>	<b>78.5</b>	<b>56.5</b>	<b>47.2</b>	<b>6.4</b>	<b>43.6</b>	<b>15.1</b>	<b>0.0</b>	
<i>Source: 2019 D&amp;B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												