



PUBLIC DISCLOSURE

July 8, 2019

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Consumers National Bank
Charter Number: 15543

614 E. Lincoln Way
Minerva, OH 44657

Office of the Comptroller of the Currency
Northern Ohio Field Office
200 Public Square, Suite 1610
Cleveland, OH 44114-2301

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 Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The institution's loan-to-deposit (LTD) ratio is reasonable.
- During the evaluation, the institution originated a majority of its home mortgage loans and small loans to businesses within its assessment areas (AAs).
- The institution's geographic distribution of home mortgage loans and small loans to businesses reflects a reasonable dispersion among geographies of different income levels throughout its AAs.
- The institution's distribution of home mortgage loans and small loans to businesses reflects a reasonable penetration to borrowers of different income levels and businesses of different sizes.
- The institution has demonstrated adequate responsiveness to the community development (CD) needs of its Stark and Carroll AA, and of its Columbiana AA.

Loan-to-Deposit Ratio

Consumers National Bank's (CNB or bank) LTD ratio is reasonable, given the bank's size and financial condition, and the credit needs of its AAs. During the evaluation period of January 1, 2016, through December 31, 2018, the bank's average quarterly LTD ratio was 73.74 percent, with quarterly ratios ranging from a low of 70.54 percent to a high of 76.02 percent. There are no similarly situated institutions located in the bank's lending area. The bank's performance is reasonable, considering its competition from other banks, credit unions, and non-local financial institutions. The bank also sells a significant number of home mortgage loans to secondary market investors, and experienced significant deposit growth (\$83 million) during the evaluation period. Both factors have a negative impact on the bank's LTD ratio.

Lending in Assessment Area

CNB originates a majority of its loans within its AAs. As shown in the table below, the bank originated 64.63 percent by number and 56.59 percent by dollar amount of its total loans within its AAs during the evaluation period. The analysis does not include extensions of credit by affiliates of the bank, which may be considered under other performance criteria.

Lending Inside and Outside of the Bank's Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	201	65.69	105	34.31	306	34,695	58.42	24,691	41.58	59,386
Small Business	75	61.98	46	38.02	121	20,134	53.68	17,372	46.32	37,506
Total	276	64.63	427	35.37	427	54,829	56.59	42,063	43.41	96,892

2016, 2017, and 2018 HMDA data, and bank small loans to businesses data.

Description of Institution

CNB is a full-service intrastate community bank headquartered in Minerva, Ohio. The bank is a wholly-owned subsidiary of Consumers Bancorp, Inc., a one-bank holding company, which is also headquartered in Minerva, Ohio. As of December 31, 2018, the bank had \$516.5 million in total assets, \$46.6 million in Tier 1 capital, and four AAs. The bank's primary AAs are its Stark and Carroll AA, which contains Stark County and Carroll County, and its Columbiana AA, which contains Columbiana County. Stark and Carroll Counties are part of the Canton-Massillon, OH MSA, while Columbiana County is not part of an MSA. When the bank opened its Bergholz branch on May 8, 2017, and its Fairlawn branch on September 4, 2018, it added two AAs (the Jefferson AA and the Summit AA). The Jefferson AA only includes a portion of Jefferson County, which is part of the Weirton-Steubenville, WV-OH MSA. The Summit AA only includes a portion of Summit County, which is part of the Akron, OH MSA. The bank did not open any other branches during our evaluation period, and it did not close any branches.

During the evaluation period, CNB operated a total of fourteen full-service branches, including nine branches (with the main office) in the Stark and Carroll AA, three branches in the Columbiana AA, and one branch each in the Jefferson AA and Summit AA. The bank also has a loan production office in Wayne County. Each branch has an onsite deposit-taking ATM. Excluding one branch in the Stark and Carroll AA and one branch in the Summit AA, every branch also offers drive-through services.

CNB's primary business focus is on home mortgage and small business lending. In addition to originating loans for its own portfolio, the bank acts as a broker and originates home mortgage loans for sale to secondary market investors. Based on Federal Deposit Insurance Corporation (FDIC) Deposit Market Share reports from June 30, 2016, and June 30, 2018, deposits at the bank have increased from \$347 million to \$430 million. As of the June 30, 2018, \$297 million (69.18 percent) of the total deposits were from the Stark and Carroll AA, \$119 million (27.55 percent) were from the Columbiana AA, and the remaining \$14 million (3.27 percent) was from the Jefferson AA. The branch in the Summit AA did not open until September 4, 2018. As a result, deposit data for the Summit AA was not available in the FDIC Deposit Market Share reports.

We considered information from two community contacts to help evaluate CNB's responsiveness to the credit and CD needs of each AA, and to determine whether there are other CD opportunities that financial institutions can participate in.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation covers the period from January 1, 2016, through December 31, 2018. In conducting the evaluation, we used Intermediate Small Bank Community Reinvestment Act (CRA) examination procedures. We evaluated CNB's lending performance based on its primary loan products, which include home mortgage loans and small loans to businesses. While the bank offers farm, multi-family, home equity, and consumer installment loans, these products are not a primary focus for the bank, and as a result are not considered in this evaluation. However, we did consider multi-family loans that qualify as CD loans, as part of our CD lending assessment.

Selection of Areas for Full-Scope Review

We completed full-scope reviews for CNB's Stark and Carroll AA and Columbiana AA. These two AAs contain most of the bank's branches, and provide most of its deposit base and loan business. We completed a limited-scope review for the Jefferson AA, because the bank did not have a branch in this AA until May 8, 2017, or approximately half way through the review period. We did not complete a review for the Summit AA as part of this evaluation, because the bank did not have a branch in this AA until September 4, 2018, or less than six months before the end of the evaluation period. As a result, an analysis of the bank's performance in this AA would not be meaningful. Refer to the *Scope of Evaluation in Ohio* section for details regarding how full-scope AAs were selected. Refer to *Appendix A: Scope of Examination* for a list of full- and limited-scope AAs.

Ratings

CNB's overall CRA rating is based on its performance within the state of Ohio. The bank's state rating is primarily based on its performance within the two AAs receiving full-scope reviews. Refer to the *Scope of Evaluation in Ohio* section for details regarding how AAs were weighted in arriving at overall 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 Ohio¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- CNB's geographic distribution of home mortgage and small loans to businesses is reasonable.
- The bank's distribution of home mortgage loans to borrowers of different income levels and businesses of different sizes is reasonable.
- The bank has originated an adequate level of CD loans.
- The bank has made an adequate level of qualified CD investments.
- The bank had an adequate level of CD services that were responsive to the community needs.

Description of Institution's Operations in Ohio

CNB offers a wide range of deposit and loan products. Deposit products include personal and business checking and savings accounts, certificates of deposit, Individual Retirement Accounts (IRAs), health savings accounts, money market accounts, debit cards, cash management services, and wealth management services. The bank also offers online banking, online bill pay, mobile banking, remote deposit capture, and mobile payment options. Loan products include home mortgage loans, home equity loans, construction loans, and various other consumer loan products in addition to business loans. The bank's loan portfolio is 36.84 percent commercial real estate loans, 15.62 percent home mortgage loans, 13.47 percent agricultural loans, 13.31 percent commercial and industrial loans, 6.44 percent multi-family mortgage loans, 4.81 percent other loans and leases, 4.60 percent home equity lines of credit, and 1.49 percent consumer installment loans. The bank also originates home mortgage loans as a broker for four secondary market investors. The bank does not report these loans in its HMDA data because the investors make the underwriting decision. The loans sold to investors offer better terms and rates, while the loans originated for the bank's own portfolio typically do not qualify for secondary market investor financing or have shorter terms or higher rates. As a result, the bank originated more brokered home mortgage loans than loans for its own portfolio during the evaluation period. As shown in the tables in Appendix D, the bank originated 366 brokered home mortgage loans in the Stark and Carroll AA, and 63 in the Columbiana AA during the evaluation period. Comparatively, the bank originated 152 home mortgage loans in the Stark and Carroll AA and 46 home mortgage loans in the Columbiana AA that are held in its own portfolio and reported in HMDA data for the evaluation period. The investors include US Bank, First Guarantee Corporation, Home Point Financial, and NewRez, LLC.

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

During the evaluation period, CNB operated 14 branch offices including its main office and two new offices opened in 2018. All of the bank's branch offices are in smaller cities or rural communities throughout its AAs. As of December 31, 2018, the bank had one branch office located in each of the following cities: Minerva, East Canton, Louisville, Alliance, Waynesburg, Hartville, Jackson-Belden, Salem, Lisbon, Hanoverton, Carrollton, Malvern, Bergholz, and Fairlawn. The branch in Bergholz was opened on May 8, 2017, and the branch in Fairlawn was opened on September 4, 2018. The bank also operated a loan production office in Wooster. All of the branch locations offer similar service hours along with extended hours on Friday. Excluding the Fairlawn branch, each branch is open on Saturdays. All branches, except for the Fairlawn and Brewster branches, include drive-through services with the same service hours. Each branch includes an onsite deposit-taking ATM. The bank is a member of the MoneyPass ATM network, which provides its customers with access to a network of surcharge-free ATMs across the country. The bank did not close any branch offices during the evaluation period.

Nine of CNB's 14 branches are located in its Stark and Carroll AA. Based on the June 30, 2018, FDIC Deposit Market Share Report, 69.18 percent of the bank's total deposits are from this AA. The AA is a mix of rural and urban areas, and its population declined slightly from 404,422 persons according to 2010 U.S. Census data, to 403,340 persons according to 2015 American Community Survey (ACS) data. The largest cities in the AA are Canton, Massillon, and Alliance, all of which are in Stark County. The economy is driven largely by manufacturing, retail, and health care. Major employers include Aultman Hospital, The Timken Company, and Mercy Medical Center. Canton is home to the Pro Football Hall of Fame. The unemployment rates in Stark and Carroll Counties were 5.2 and 5.5 percent, respectively, as of December 31, 2018. These rates were higher than both the national unemployment rate of 3.7 percent, and the state unemployment rate of 4.8 percent. Based on 2010 U.S. Census data, the AA had eight low-income census tracts (CTs) and 13 moderate-income CTs. All eight low-income CTs, and 12 of the 13 moderate-income CTs, were in Stark County and concentrated in the cities of Canton, Massillon, and Alliance. Carroll County had one moderate-income CT, located in the southeastern part of the county. Based on 2015 ACS data, the AA has nine low-income CTs and 11 moderate-income CTs, all of which are located in Stark County and concentrated in the cities of Canton, Massillon, and Alliance, and all of the CTs in Carroll County are designated as middle-income. Based on both 2010 U.S. Census and 2015 ACS data, the majority of CTs in the AA are middle-income, and the second largest number of CTs are upper-income.

Three of CNB's branches are located in its Columbiana AA. Based on the June 30, 2018, FDIC Deposit Market Share Report, 27.55 percent of the bank's total deposits are from this AA. Columbiana County is a largely rural area, located in the Cleveland-Pittsburgh industrial corridor, and its population declined from 107,841 persons according to 2010 U.S. Census data, to 105,987 persons according to the 2015 ACS data. The two largest cities in the AA are Salem and East Liverpool. Prominent industries include manufacturing, health care and social assistance, and retail trade. Major employers include American Standard, Fresh Mark Inc., and Salem Community Hospital. As of December 31, 2018, the unemployment rate in the county was 5.4 percent, and exceeded both the national and state unemployment rates. Based on 2010 U.S. Census data, the AA had seven moderate-income CTs and no low-income CTs. Based on 2015 ACS data, the AA had three moderate-income CTs and no low-income CTs. Based on both 2010 U.S. Census and 2015 ACS data, a majority of CTs in the AA are middle-income. Only a few CTs are upper-income.

The banking environment within the CNB's AAs is very competitive. Based on the June 30, 2018, FDIC Deposit Market Share reports, there were 18 institutions in the Stark and Carroll AA, and 10 institutions in the Columbiana AA competing for deposits. These figures do not include credit unions or non-bank financial institutions. Based on 2017 aggregate home mortgage data, there were 290 lenders that

originated or purchased residential mortgage loans in the Stark and Carroll AA, and 166 in the Columbiana AA. Furthermore, based on 2017 small business loan aggregate data, there were 78 lenders that reported originating or purchasing small business loans in the Stark and Carroll AA, and 56 in the Columbiana AA.

There are no financial, legal, or other impediments restricting CNB's capacity to serve its AAs. The bank received a Satisfactory rating in its last CRA Performance Evaluation, dated May 31, 2016.

We considered information from two community contacts during our evaluation. One services Stark and Carroll Counties, and the other services Columbiana County. Each community contact represents a non-profit organization that focus on social services such as housing, community programs, and financial stability. We considered the information provided by the community contacts in order to assess the bank's performance in meeting the AA's credit and CD needs. Both community contacts indicated that there are CD opportunities for banks. The community contact for Stark and Carroll Counties indicated that CD needs include small-dollar short-term loans with affordable interest rates, credit starter loans backed with credit and money management workshops, incentivized savings accounts to entice area residents to build liquid assets, and a workshop aimed to remove names from Cheque Systems, so individuals can access banking products and services. The Columbiana County contact indicated that there is a need for financial literacy programs, and to improve area residents' access to financial services such as checking accounts.

Stark and Carroll AA

Table A - Demographic Information of the Assessment Area						
Assessment Area: 2016 Stark and Carroll Counties						
Demographic Characteristics / Income Classification	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	93	8.6	14.0	55.9	21.5	0.0
Population by Geography	404,422	4.8	12.3	57.2	25.8	0.0
Housing Units by Geography	178,447	5.8	13.5	56.7	24.0	0.0
Owner-Occupied Units by Geography	116,548	3.1	9.8	60.2	26.8	0.0
Occupied Rental Units by Geography	45,861	10.4	18.5	51.7	19.3	0.0
Vacant Units by Geography	16,038	11.7	26.1	45.7	16.5	0.0
Businesses by Geography	21,322	6.7	9.6	52.3	31.5	0.0
Farms by Geography	932	1.4	6.1	68.8	23.7	0.0
Family Distribution by Income Level	109,045	19.3	19.0	21.7	40.0	0.0
Household Distribution by Income Level	162,409	22.9	17.2	18.5	41.4	0.0
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$55,645	Median Housing Value			\$124,717
			Median Gross Rent			\$608
			Families Below Poverty Level			9.5%

Source: 2010 U.S. Census and 2016 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.*

Table B - Demographic Information of the Assessment Area

Assessment Area: 2018 Stark and Carroll Counties

Demographic Characteristics / Income Classification	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	93	9.7	11.8	63.4	14.0	1.1
Population by Geography	403,340	6.3	10.7	65.7	17.0	0.3
Housing Units by Geography	179,072	6.8	11.4	65.7	15.5	0.5
Owner-Occupied Units by Geography	112,214	3.4	8.2	69.8	18.6	0.0
Occupied Rental Units by Geography	49,143	12.3	17.3	57.7	11.4	1.3
Vacant Units by Geography	17,715	13.4	15.2	62.2	7.8	1.4
Businesses by Geography	21,904	5.3	6.9	66.5	18.9	2.4
Farms by Geography	933	1.6	2.1	82.1	13.9	0.2
Family Distribution by Income Level	106,626	19.6	18.7	21.9	39.8	0.0
Household Distribution by Income Level	161,357	23.7	16.4	18.4	41.5	0.0
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$59,302	Median Housing Value			\$117,531
			Median Gross Rent			\$660
			Families Below Poverty Level			10.7%

Source: 2015 ACS data and 2017 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.

Columbiana AA**Table A - Demographic Information of the Assessment Area**

Assessment Area: 2016 Columbiana County

Demographic Characteristics / Income Classification	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	0.0	29.2	66.7	4.2	0.0
Population by Geography	107,841	0.0	21.8	73.1	5.2	0.0
Housing Units by Geography	47,184	0.0	23.4	71.8	4.8	0.0
Owner-Occupied Units by Geography	31,485	0.0	20.8	73.6	5.6	0.0
Occupied Rental Units by Geography	10,677	0.0	27.0	69.1	3.9	0.0
Vacant Units by Geography	5,022	0.0	32.0	65.9	2.1	0.0
Businesses by Geography	5,305	0.0	17.4	75.4	7.2	0.0
Farms by Geography	341	0.0	16.4	80.1	3.5	0.0
Family Distribution by Income Level	29,413	22.0	20.6	21.0	36.4	0.0
Household Distribution by Income Level	42,162	25.6	18.2	18.4	37.8	0.0
Median Family Income Non-MSAs - OH		\$52,573	Median Housing Value			\$98,513
			Median Gross Rent			\$557
			Families Below Poverty Level			12.1%

Source: 2010 U.S. Census and 2016 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.

Table B - Demographic Information of the Assessment Area						
Assessment Area: 2018 Columbiana County						
Demographic Characteristics / Income Classification	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	0.0	12.5	75.0	12.5	0.0
Population by Geography	105,987	0.0	8.0	80.7	11.3	0.0
Housing Units by Geography	46,777	0.0	8.1	80.1	11.8	0.0
Owner-Occupied Units by Geography	29,930	0.0	5.7	82.0	12.3	0.0
Occupied Rental Units by Geography	12,157	0.0	11.8	78.3	9.9	0.0
Vacant Units by Geography	4,690	0.0	14.3	72.7	12.9	0.0
Businesses by Geography	5,045	0.0	5.0	79.7	15.2	0.0
Farms by Geography	330	0.0	0.9	80.3	18.8	0.0
Family Distribution by Income Level	28,616	20.8	19.0	21.7	38.6	0.0
Household Distribution by Income Level	42,087	23.9	16.4	18.6	41.1	0.0
Median Family Income Non-MSAs - OH		\$56,217	Median Housing Value			\$101,554
			Median Gross Rent			\$606
			Families Below Poverty Level			11.3%

Source: 2015 ACS data and 2017 D&B data. Due to rounding, totals may not equal 100.0. () The NA category consists of geographies that have not been assigned an income classification.*

Scope of Evaluation in Ohio

We completed full-scope reviews for CNB's Stark and Carroll AA and the Columbiana AA, and a limited-scope review for the Jefferson AA because it was only a delineated AA for approximately half of the review period. We did not analyze the bank's performance within the Summit AA as part of our evaluation, because it didn't become an AA until the bank opened a branch in the city of Fairlawn on September 4, 2018. This left a very limited amount of time (less than a year) prior to the end of our review period. As a result, any analysis of the bank's performance in the AA would not be meaningful.

We based our rating for the bank's performance in the state of Ohio primarily on the results of the AAs that received full-scope reviews. Furthermore, performance in the Stark and Carroll AA is weighted more heavily in arriving at our overall conclusions, as this AA represents the bank's original market and still has the most branch offices and deposits. The bank also originated its largest number of loans in this AA. Of the home mortgage and small loans to businesses that the bank originated in 2016 through 2018, 80.80 percent were originated in the Stark and Carroll AA, 17.39 percent were originated in the Columbiana AA, and 1.81 percent were originated in the Jefferson AA.

CNB is a reporting bank for HMDA Loan Application Registrar (LAR) data. The bank also acts as a broker, originating home mortgage loans for four secondary market investors. The loans originated for secondary market investors are not reported in the bank's HMDA LAR data, because the bank does not make the credit decision for those loans. Therefore, in addition to evaluating the bank's home mortgage lending performance based on its reported HMDA LAR data, we gave consideration to the loans sold to secondary market investors. The bank is not a reporting bank for CRA data (i.e., small business loan data). Therefore, we obtained the necessary information from 100 percent of the bank's small loans to businesses originated during the evaluation period, and utilized that information to evaluate the bank's small business lending performance.

For the Lending Test, we performed one analysis of CNB's 2016 data and another of 2017 and 2018 data. This was due to changes instituted by the Federal Financial Institutions Examination Council (FFIEC), which started using 2015 ACS data as of January 1, 2017. The change to ACS data resulted in updated demographic information related to population and housing, and changes to the income designations of some CTs. The 2017 and 2018 analysis period will receive more weight than the 2016 period, as the bank performed a larger portion of its lending activity during the 2017 and 2018 period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

CNB's performance under the Lending Test in Ohio is Satisfactory. Based on full-scope reviews, the bank's lending performance in the state of Ohio is reasonable.

Distribution of Loans by Income Level of the Geography

CNB's geographic distribution of loans in the state of Ohio is reasonable. In drawing this conclusion, we placed the most weight on the bank's performance in the Stark and Carroll AA.

Home Mortgage Loans

CNB's geographic distribution of home mortgage loans reflects a reasonable dispersion throughout its AAs. In drawing this conclusion, we considered the level of competition as well as the number of owner-occupied housing units located in the AAs' low- and moderate-income CTs. We also considered the bank's home mortgage brokerage activity in each AA, and the effect of that brokerage activity on the bank's ability to originate home mortgages for its own portfolio and reported in its HMDA data.

Refer to the *Description of Institution's Operations in Ohio* section and 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.

Stark and Carroll AA

CNB's geographic distribution of home mortgage loans originated for its own portfolio in the Stark and Carroll AA is reasonable. During 2016, the bank did not originate any loans in low-income CTs. However, it originated 10.71 percent of its loans in moderate-income CTs, while only 9.84 percent of the AA's owner-occupied housing is in moderate-income CTs and only 5.82 percent of aggregate lending occurred in moderate-income CTs. The bank also originated 97 brokered home mortgage loans that it sold to secondary market investors. None of the 97 brokered loans were in low-income CTs, but 11.34 percent of them were in moderate-income CTs. During 2017 and 2018, the bank originated 1.04 percent of the home mortgage loans for its own portfolio in low-income CTs, which was near the 3.43 percent of the AA's owner-occupied housing units that are located in low-income CTs, and exceeded the 1.70 percent of aggregate home mortgage lending that occurred in low-income CTs. While the 3.13 percent of home mortgage loans that were originated for its own portfolio in moderate-income CTs was significantly lower than the 8.18 percent of the AA's owner-occupied housing units that are located in those CTs, it is near the 5.80 percent of aggregate home mortgage lending that occurred in moderate-income CTs. The bank's performance originating brokered home mortgage loans to secondary market investors during 2017 and

2018 was similar. The bank originated 269 brokered home mortgage loans during those years, with no loans in low-income CTs, and 2.97 percent of the loans in moderate-income CTs.

The bank's performance is reasonable considering the limited opportunities to lend in low- or moderate-income CTs, and the competition for loans in those CTs. Based on 2010 U.S. Census and 2015 ACS data, a significant majority of owner-occupied housing units were in the AA's middle- and upper-income CTs. Specifically, 2010 Census data showed that only 3.1 percent of the AA's owner-occupied housing were in low-income CTs, and only 9.8 percent were in moderate-income CTs (compared to approximately 86 percent in middle- or upper-income CTs). Based on 2015 ACS data, the percentage of the AA's owner-occupied housing units in low-income CTs increased 3.4 percent, while the percentage in moderate-income CTs declined to 8.2 percent. Furthermore, based on home mortgage loan aggregate data from 2016 and 2017, 116 and 100 lenders, respectively, originated home mortgage loans in low- or moderate-income CTs in the AA. In total, the lenders originated 767 home mortgage loans in low- or moderate-income CTs during 2016, and 760 home mortgage loans in low- or moderate-income CTs during 2017. During 2016, less than 13 lenders out of the 116 that originated home mortgage loans in low- or moderate-income CTs originated more than 20 loans. During 2017, only 10 lenders originated more than 10 home mortgage loans in low- or moderate-income CTs. The top five lenders for each year originated over 40 percent of the loans in the AA. During 2016 and 2017, excluding the home mortgage loans brokered by the bank, the bank ranked 22nd and 35th, respectively, in total home mortgage loans originated in low- or moderate-income CTs.

Columbiana AA

CNB's geographic distribution of home mortgage loans in the Columbiana AA is reasonable. There were no low-income CTs within the Columbiana AA during the evaluation period. Based on 2010 U.S. Census data, there were seven moderate-income CTs within the AA during 2016. The seven CTs contained approximately 6,549 owner-occupied housing units, or 20.8 percent of the overall AA's owner-occupied housing units. However, the number of moderate-income CTs declined to three with the change to 2015 ACS data. As a result, the number of owner-occupied housing units in moderate-income CTs declined to 1,706, or 5.7 percent of the AA's total owner-occupied housing units.

During 2016, CNB only originated 18 home mortgage loans in the Columbiana AA for its own loan portfolio. Of the 18 loans, 38.89 percent were originated in moderate-income CTs, which exceeded the percentages of the AA's owner-occupied homes (20.82 percent) and aggregate home mortgage lending (16.03 percent) in moderate-income CTs. The bank also originated 22 brokered home mortgage loans in the AA during 2016. Of those 22 loans, 13.64 percent were in moderate-income CTs. While this was significantly less than the percentage of the AA's owner-occupied housing located in moderate-income CTs, it was near the percentage of aggregate home mortgage lending that occurred in those CTs.

During 2017 and 2018, CNB did not originate any home mortgage loans in moderate-income CTs in the Columbiana AA. The bank's ability to lend in the AA's three moderate-income CTs was impacted by the decline in the percentage of the AA's owner-occupied housing units that were located in moderate-income CTs, along with competition from other financial institutions. Based on 2017 home mortgage aggregate data, there were 30 financial institutions that originated or purchased 88 home mortgage loans in the AA's three moderate-income CTs. The majority of the 30 financial institutions originated or purchased less than three loans during 2017.

Small Loans to Businesses

CNB's geographic distribution of small loans to businesses is reasonable. In drawing our conclusion, we considered the level of competition for small business loans in each AA. We also considered the number of businesses located in low- and moderate-income CTs.

Refer to the *Description of Institution's Operations in Ohio* section and Table Q in the *State of Ohio* section of Appendix D for the facts and data used to evaluate the geographic distribution of CNB's small loans to businesses.

Stark and Carroll AA

CNB's geographic distribution of small loans to businesses in the Stark and Carroll AA is reasonable. During 2016, the bank originated 7.69 percent of its small loans to businesses in low-income CTs, and 7.69 percent of its small loans to businesses in moderate-income CTs. The percentage of the bank's small loans to businesses in low-income CTs slightly exceeded the percentage of the AA's non-farm businesses located in low-income CTs, and the percentage the bank's small loans to business in moderate-income CTs was near the percentage of non-farm businesses in moderate-income CTs. Furthermore the bank's percentages of small loans to businesses in low- and moderate-income CTs slightly exceeded aggregate lending percentages in both low-income CTs (5.22 percent) and moderate-income CTs (6.98 percent).

During 2017 and 2018, the bank originated 4.44 percent of its small loans to businesses in low-income CTs, which was close to both the percentage of the AA's non-farm businesses in low-income CTs (4.76 percent) as well as the aggregate lending percentage in low-income CTs (4.18 percent). However, the bank originated 2.22 of its small loans to businesses in moderate-income CTs, which was significantly less than the 6.71 percent of the AA's non-farm businesses that are located in moderate-income CTs, and the aggregate lending percentage in moderate-income percentage in moderate-income CTs (6.13 percent). The bank's lower level of lending in moderate-income CTs is primarily due to strong competition for lending opportunities.

Columbiana AA

We did not perform an analysis of CNB's geographic distribution of small loans to business in the Columbians AA, because the bank did not originate a sufficient number of loans to allow for a meaningful analysis. Based on internal reports, the bank only originated two small loans to business within the AA during 2016, 2017, and 2018.

Distribution of Loans by Income Level of the Borrower

CNB's distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable, given the product lines offered by the bank.

Home Mortgage Loans

CNB's overall distribution of home mortgage loans among borrowers of different income levels is reasonable. When drawing our conclusions, we considered the bank's home mortgage brokerage lending

activities. We also considered factors that affected the bank's ability to lend to borrowers of different income levels in each AA.

Refer to Table P in the *State of Ohio* section of Appendix D for the facts and data used to evaluate the bank's distribution of home mortgage loans to borrowers of different income levels.

Stark and Carroll AA

CNB's distribution of home mortgage loans to borrowers of different income levels in the Stark and Carroll AA is reasonable. When drawing our conclusions, we gave consideration to the high level of families living below the poverty level within the AA during the review period. According to 2010 U.S. Census data, 9.5 percent of families in the AA were living below the poverty level. Based on 2015 ACS data, the percentage of families living below the poverty level increased to 10.7 percent. Given the AA's median housing values, based on the 2010 U.S. Census and 2015 ACS data (\$124,717 and \$117,531, respectively), it is difficult for families living below the poverty level to qualify for financing and achieve home ownership. Furthermore, there is a high level of competition for lending opportunities in the AA. Based on 2016 and 2017 home mortgage aggregate data, there were 297 and 290 financial institutions, respectively, reporting the origination or purchase of home mortgage loans in the AA.

During 2016, CNB originated 7.14 percent of the home mortgage loans for its own portfolio in the AA to low-income borrowers, which was significantly less than the 19.27 percent of AA families that are low-income. However, the bank's 7.14 percent was close to the aggregate lending percentage to low-income borrowers (8.05 percent). Furthermore, while the bank's percentage of brokered home mortgage loans to low-income borrowers (11.34 percent) was less than the percentage of low-income families, it exceeded the aggregate lending percentage to low-income borrowers. The bank's percentage of home mortgage loans for its own portfolio to moderate-income borrowers (12.50 percent) was significantly below both the percentage of moderate-income families in the AA (19.02 percent) and aggregate lending percentage to moderate-income borrowers (18.86 percent). However, the bank originated 26.80 percent of its brokered home mortgage loans to moderate-income borrowers, which significantly exceeded both the percentage of moderate-income families in the AA, and the aggregate lending percentage to moderate-income borrowers.

During 2017 and 2018, CNB originated significantly more brokered home mortgage loans (269) than home mortgage loans for its own portfolio and reported on its HMDA LAR (96). For the home mortgage loans originated for the bank's own portfolio, the percentages of loans to low-income borrowers (3.13 percent) and moderate-income borrowers (9.38 percent) were significantly lower than both the percentages of low- and moderate-income families in the AA (19.58 percent and 18.72 percent, respectively), and the aggregate lending percentages to low- and moderate-income borrowers (9.20 percent and 20.20 percent, respectively). However, the bank originated 7.44 percent of its brokered home mortgage loans to low-income families, which was close to the aggregate lending percentage to low-income borrowers. The bank percentage of brokered home mortgage loans moderate-income borrowers (21.19) percent slightly exceeded both the percentage of moderate-income families in the AA, and the aggregate lending percentage to moderate-income borrowers.

Columbiana AA

CNB's distribution of home mortgage loans to borrowers of different income levels in the Columbiana AA is reasonable. When drawing our conclusions, we gave consideration to the high level of families living below the poverty level within the AA during the evaluation period. According to 2010 U.S. Census

data, 12.1 percent of families in the AA were living below the poverty level. Based on 2015 ACS data, the percentage of families living below the poverty level declined slightly to 11.3 percent. Given the AA's median housing values, based on the 2010 U.S. Census and 2015 ACS data (\$98,513 and \$101,554, respectively), it is difficult for these living below the poverty level to qualify for financing and achieve home ownership. Furthermore, there is a high level of competition for lending opportunities within the AA. Based on 2016 and 2017 home mortgage aggregate data, there were 155 and 166 financial institutions, respectively, reporting the origination or purchase of home mortgage loans in the AA.

During 2016, CNB only originated 18 home mortgage loans within the AA for its own portfolio. However, 5.56 percent of these loans were to low-income borrowers, and 22.22 percent were to moderate-income borrowers. While the bank's percentage of loans to low-income borrowers was significantly below the 22.02 percent of families in the AA that are low-income, it was near the 7.54 percent of aggregate lending that occurred to low-income borrowers. The bank's percentage of home mortgage lending to moderate-income borrowers was better at 22.22 percent, which slightly exceeded the 20.59 percent of families in the AA that are moderate-income, and the 19.77 percent of aggregate lending that occurred to moderate-income borrowers. The bank also originated 22 brokered home mortgage loans in the AA during 2016, with 27.27 percent to low-income borrowers and 13.64 percent to moderate-income borrowers. The bank's percentage of brokered home mortgage loans that was to low-income borrowers exceeded the percentage families in the AA that are low-income, and the percentage of aggregate lending that occurred to moderate-income borrowers. However, the percentage of the bank's brokered home mortgage loans that was to moderate-income borrowers was significantly below the percentages for families in the AA that were moderate-income, and the percentage of aggregate lending that occurred to moderate-income borrowers.

During 2017 and 2018, CNB originated 7.14 percent of the home mortgage loans for its own portfolio to low-income borrowers within the AA, which is significantly below the 20.87 percent of AA families that are low-income. However, the 7.14 percent was near the 8.35 percent of aggregate lending that occurred to low-income borrowers. The bank also originated 10.72 of the home mortgage loans for its own portfolio to moderate-income borrowers, which was significantly below the 18.96 percent of AA families that are moderate-income, and the 25 percent of aggregate lending that occurred to moderate income borrowers. The bank's performance with brokered home mortgage lending to low- and moderate-income borrowers was better. During 2017 and 2018, the bank originated 7.32 percent of its brokered home mortgage loans in the AA to low-income borrowers, which is near the percent of aggregate lending that occurred to low-income borrowers. Furthermore, the bank originated 19.51 percent of its brokered home mortgage loans to moderate-income borrowers, which slightly exceeded the percentage of AA families that are moderate-income.

Small Loans to Businesses

CNB's overall distribution of small loans to businesses is reasonable.

Refer to Table R in the *State of Ohio* section of Appendix D for the facts and data used to evaluate the bank's distribution of loans to business of different sizes.

Stark and Carroll AA

CNB's distribution of small loans to businesses with gross annual revenues of \$1 million or less is reasonable. During 2016, CNB originated 26 small loans to businesses. Of the 26 loans, 76.92 percent were to businesses with gross annual revenues of \$1 million or less. The bank's 76.92 percent compares

closely to the percentage of businesses in the AA with gross annual revenues of \$1 million or less (80.94 percent), and significantly exceeded the aggregate lending percentage to businesses with gross annual revenues of \$1 million or less (46.03 percent).

During 2017 and 2018, CNB originated 45 small loans to businesses. Of the 45 loans, 66.67 percent were to businesses with gross annual revenues of \$1 million or less. The bank's 66.67 percent was less than the percentage of businesses in the AA with gross annual revenues of \$1 million or less (80.62 percent), but significantly exceeded the aggregate lending percentage to businesses with gross annual revenues of \$1 million or less (48.23 percent).

Columbiana AA

We did not perform an analysis of CNB's distribution of small loans to business in the Columbians AA, because the bank did not originate a sufficient number of loans to allow for a meaningful analysis. Based on internal reports, the bank only originated two small loans to business within the AA during 2016, 2017, and 2018.

Responses to Complaints

CNB did not receive any complaints during the evaluation period that would affect its CRA rating.

Conclusions for Area Receiving Limited Scope Review

Based on a limited-scope review, CNB's performance under the Lending Test in the Jefferson AA is weaker than its overall performance under the Lending Test in the full-scope AAs. The weaker performance in the Jefferson AA is expected, as this was not a delineated AA for the bank in 2016. Furthermore, the bank was new to the market in mid-2017, after establishing a branch in the AA on May 8, 2017. As a result of the bank's limited presence in the AA during the evaluation period, the bank experienced a low-level of lending, and only originated three home mortgage loans for its own portfolio, six home mortgage loans for sale to the secondary market, and two small loans to businesses.

COMMUNITY DEVELOPMENT TEST

CNB's performance under the Community Development Test in the state of Ohio is Satisfactory.

Based on a full-scope review, CNB exhibits adequate responsiveness to CD development needs in its AAs through CD loans, qualified investments, and CD services, considering the bank's capacity and the need and availability of CD opportunities.

Number and Amount of Community Development Loans

CNB's CD loan activity in the state of Ohio and its AAs during the evaluation period was adequate, and consisted of three loans and two lines of credit totaling approximately \$2.71 million. In drawing our conclusion, we considered the competition for CD loans within each AA. Information on each CD loan is presented below, along with the AA that it impacted.

- A \$1 million line of credit to an affordable housing organization serving both the Stark and Carroll AA and the Jefferson AA. The line of credit is used by the organization to help support daily operations.
- A \$375,000 loan to an organization that serves the Stark and Carroll AA, providing and supporting various social services programs such as affordable housing, day habilitation services, and support services for employment programs. The funds were used to purchase a property to be used to expand current services.
- A \$213,075 loan to a non-profit community action agency serving the Columbiana AA. The funds were used to purchase property to establish a medical center.
- A \$118,000 loan to a non-profit community action agency serving the Columbiana AA. The funds were used to establish a new health center located in a low-income area within the county.
- A \$1 million line of credit to a non-profit community action agency serving the Columbiana AA. The line of credit is used by the agency to support operations.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$	#	% of Total #	\$	% of Total \$	#	\$
Stark and Carroll	0	.00	11	805,706	11	68.75	805,706	96.34	0	.00
Columbiana	0	.00	2	29,000	2	12.50	29,000	3.46	0	.00
Jefferson	0	.00	3	1,650	3	18.75	1,650	0.20	0	.00

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

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

The bank's overall performance under the Investment Test in the state of Ohio is satisfactory. As shown in the Qualified Investment table above, the bank made a total of 16 qualified CD investments within its AAs during the review period, totaling approximately \$836,356. When drawing our conclusion regarding the bank's performance, we considered the level of competition within the AAs for CD investments. The following represents general descriptions of the qualifying CD investments made during the evaluation period:

- The bank invested \$800,000 in a qualified zone academy bond that provided support for school Science, Technology, Engineering, and Mathematics (STEM) and educational programs in the Stark and Carroll AA. The school receiving the support has a significant number of economically disadvantage students, most of whom receive free or reduced-cost lunches.
- The bank made 10 in-kind donations totaling \$5,706 to various organizations that support economic development, affordable housing, or social services in the Stark and Carroll AA.

- The bank made two in-kind donations totaling \$4,000 to a small business economic development center that services the Columbiana AA, and focuses on small businesses, economic development, and training services.
- The bank donated \$25,000 to a rural scholars program in the Columbiana AA. The funds benefitted schools that have a majority of their students who are economically disadvantaged and on the free or reduced-cost lunch program. The funds were used to support the schools' STEM and educational programs.

Extent to Which the Bank Provides Community Development Services

CNB's CD service performance over the evaluation period is reasonable. The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels, with generally consistent services and hours among branches. The bank supplements customer access to financial services through electronic banking services and nationwide access to an ATM network.

Stark and Carroll AA

CNB's community development service performance in the Stark and Carroll AA is adequate. The bank's services are reasonably accessible to geographies and individuals of different income levels within the AA. Our review of the bank's branch network within the AA found that the branch services, and hours of operation, are consistent across all branch offices and do not vary in a way that inconveniences low- or moderate-income CTs or individuals. Based on 2010 U.S. Census data, the bank had four full-service branches located near moderate-income CTs in the AA. However, as a result of the change to 2015 ACS data in 2017, and the change in the income level designation of some CTs, the bank's main office in Alliance, Ohio, is now the only branch office near moderate-income CTs. All other low- and moderate-income CTs in the AA were in the cities of Canton and Massillon, where the bank does not have any branch offices. To supplement its branch network, the bank provides customers with account services through telephone, online, and mobile banking. The bank also has deposit-taking ATMs at each of its branch locations and it belongs to the MoneyPass ATM network, which provides deposit customers with surcharge free access to a nationwide network of ATMs.

Individual bank personnel provide a low level of qualifying CD services. One member of the bank's staff is on the board of a housing organization that has a focus on affordable housing. Another member of the bank's staff is on the board of a non-profit CD foundation that focuses on economic development, financial assistance for local businesses, workforce development, and creating and retaining jobs in the area.

Columbiana AA

CNB's community development service performance in the Columbiana AA is adequate. The bank's services are reasonably accessible to geographies and individuals of different income levels within the AA. Our review of the bank's branch network within the AA found that the branch services, and hours of operation, are consistent across all branch offices and do not vary in a way that inconveniences low- or moderate-income CTs or individuals. Based on 2010 U.S. Census data, the bank had two full-service branches located near moderate-income CTs in the AA. However, as a result of the change to 2015 ACS data in 2017, and the change in the income level designation of some CTs, the number of moderate-income CTs declined and none of the bank's three branch offices were near a moderate-income CT. To

supplement its branch network, the bank provides customers with account services through telephone, online, and mobile banking. The bank also has deposit-taking ATMs at each of its branch locations and it belongs to the MoneyPass ATM network, which provides deposit customers with surcharge free access to a nationwide network of ATMs.

Individual bank personnel provide a low level of qualifying CD services. Two bank employees serve on the board of a small business economic development center that focuses on supporting economic development, small businesses, and training. One member of the bank's staff is on the Board of a housing organization that has a focus on affordable housing. One other member of the bank's staff is on the board of a non-profit community action agency that focuses on providing social services such as financial assistance, home energy assistance, transit, and educational services for low- and moderate-income people within the AA. Another employee serves on an advisory committee of a rural scholars program, which supports local schools.

Conclusions for area Receiving Limited Scope Review

Based on a limited-scope review, CNB's performance under the CD Test in the Jefferson AA is adequate, and consistent with the bank's overall performance under the CD Test in the full-scope area(s).

Appendix A: Scope of Examination

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

Time Period Reviewed:	January 1, 2016 through December 31, 2018	
Bank Products Reviewed:	Home Mortgage, Small Business. Community Development Loans, Investments, and Services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not applicable.	Not applicable	No affiliate products were reviewed.
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Ohio		
Consumers National Bank	Full-scope	Includes: Stark and Carroll Counties, which are part of the Canton-Massillon, OH MSA; Columbiana County, which is not part of an MSA; and a portion of Jefferson County, which is part of the Weirton-Steubenville, WV-OH MSA.

Appendix B: Summary of State Ratings

RATINGS - Consumers National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Consumers National Bank	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

Aggregate Lending (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

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 30th of each year. Tables without data are not included in this PE.

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

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size)

throughout those geographies. 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.

Stark and Carroll AA

January 1, 2016 – December 31, 2016

Bank Originated or Purchased HMDA Loans

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																2016		
Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Stark and Carroll Counties	56	8,456	100	3.09	0.00	1.10	9.84	10.71	5.82	60.24	73.21	59.77	26.83	16.07	33.31	0.00	0.00	0.00
Total	56	8,456	100	3.09	0.00	1.10	9.84	10.71	5.82	60.24	73.21	59.77	26.83	16.07	33.31	0.00	0.00	0.00

Source: 2010 U.S Census; 01/01/2016 – 12/31/2016 bank data; 2016 aggregate data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																2016		
Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Stark and Carroll Counties	56	8,456	100	19.27	7.14	8.05	19.02	12.50	18.86	21.68	23.21	21.82	40.03	46.43	31.51	0.00	10.71	19.77
Total	56	8,456	100	19.27	7.14	8.05	19.02	12.50	18.86	21.68	23.21	21.82	40.03	46.43	31.51	0.00	10.71	19.77

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 bank data; 2016 aggregate data.

Other Brokered Home Mortgage Loans

Table O: Assessment Area Distribution of Other Brokered Home Mortgage Loans by Income Category of the Geography																2016		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Stark and Carroll Counties	97	13,019	100	3.09	0.00	1.10	9.84	11.34	5.82	60.24	67.01	59.77	26.83	21.65	33.31	0.00	0.00	0.00
Total	97	13,019	100	3.09	0.00	1.10	9.84	11.34	5.82	60.24	67.01	59.77	26.83	21.65	33.31	0.00	0.00	0.00

Source: 2010 U.S Census; 01/01/2016 – 12/31/2016 bank data; 2016 aggregate data.

Table P: Assessment Area Distribution of Other Brokered Home Mortgage Loans by Income Category of the Borrower																2016		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Stark and Carroll Counties	97	13,019	100	19.27	11.34	8.05	19.02	26.80	18.86	21.68	27.84	21.82	40.03	34.02	31.51	0.00	0.00	19.77
Total	97	13,019	100	19.27	11.34	8.05	19.02	26.80	18.86	21.68	27.84	21.82	40.03	34.02	31.51	0.00	0.00	19.77

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 bank data; 2016 aggregate data.

Small Loans to Businesses

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography												2016	
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Stark and Carroll Counties	26	6,772	100	5.78	7.69	9.47	7.69	52.28	19.23	32.47	65.39	0.00	0.00
Total	26	6,772	100	5.78	7.69	9.47	7.69	52.28	19.23	32.47	65.39	0.00	0.00

Source: 2016 D&B data; 01/01/2016 - 12/31/2016 bank data; 2016 aggregate small loans to businesses lending throughout the AA: Low-income tracts – 5.22; Moderate-income tracts – 6.98; Middle-income tracts – 51.27; and Upper-income tracts – 36.53.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
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	
Stark and Carroll Counties	26	6,772	100	NA	80.94	76.92	46.03	6.73	23.08	12.33	0.00	
Total	26	6,772	100	NA	80.94	76.92	46.03	6.73	23.08	12.33	0.00	

Source: 2016 D&B data; 01/01/2016 - 12/31/2016; 2016 aggregate data.

January 1, 2017 – December 31, 2018

Bank Originated or Purchased HMDA Loans

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																2017-2018		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Stark and Carroll Counties	96	20,372	100	3.43	1.04	1.70	8.18	3.13	5.80	69.78	81.25	70.10	18.56	14.58	22.40	0.04	0.00	0.00
Total	96	20,372	100	3.43	1.04	1.70	8.18	3.13	5.80	69.78	81.25	70.10	18.56	14.58	22.40	0.04	0.00	0.00

Source: 2015 ACS data; 01/01/2017 – 12/31/2018 bank data; 2017 aggregate data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																2017-2018		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Stark and Carroll Counties	96	20,372	100	19.58	3.13	9.20	18.72	9.38	20.20	21.92	20.83	21.60	39.79	45.83	33.40	0.00	20.83	15.60
Total	96	20,372	100	19.58	3.13	9.20	18.72	9.38	20.20	21.92	20.83	21.60	39.79	45.83	33.40	0.00	20.83	15.60

Source: 2015 ACS data; 01/01/2017 – 12/31/2018 bank data; 2017 aggregate data.

Other Brokered Home Mortgage Loans

Table O: Assessment Area Distribution of Other Brokered Home Mortgage Loans by Income Category of the Geography																2017-2018		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Stark and Carroll Counties	269	39,633	100	3.43	0.00	1.70	8.18	2.97	5.80	69.78	85.50	70.10	18.56	11.53	22.40	0.04	0.00	0.00
Total	269	39,633	100	3.43	0.00	1.70	8.18	2.97	5.80	69.78	85.50	70.10	18.56	11.53	22.40	0.04	0.00	0.00

Source: 2015 ACS data; 01/01/2017 – 12/31/2018 bank data; 2017 aggregate data.

Table P: Assessment Area Distribution of Other Brokered Home Mortgage Loans by Income Category of the Borrower																2017-2018		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Stark and Carroll Counties	269	39,633	100	19.58	7.44	9.20	18.72	21.19	20.20	21.92	21.93	21.60	39.79	49.44	33.40	0.00	0.00	15.60
Total	269	39,633	100	19.58	7.44	9.20	18.72	21.19	20.20	21.92	21.93	21.60	39.79	49.44	33.40	0.00	0.00	15.60

Source: 2015 ACS data; 01/01/2017 – 12/31/2018 bank data; 2017 Peer aggregate data.

Small Loans to Businesses

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography												2017-2018	
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Stark and Carroll Counties	45	12,109	100	4.76	4.44	6.71	2.22	66.39	77.78	20.01	13.34	2.14	2.22
Total	45	12,109	100	4.76	4.44	6.71	2.22	66.39	77.78	20.01	13.34	2.14	2.22

Source: 2017 D&B data; 01/01/2017 - 12/31/2018 bank data; 2017 aggregate small loans to businesses lending throughout the AA: Low-income tracts – 4.18; Moderate-income tracts – 6.13; Middle-income tracts – 66.73; and Upper-income tracts – 21.51.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2018	
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	
Stark and Carroll Counties	45	12,109	100	NA	80.62	66.67	48.23	6.72	33.33	12.66	0.00	
Total	45	12,109	100	NA	80.62	66.67	48.23	6.72	33.33	12.66	0.00	

Source: 2017 D&B data; 01/01/2017 - 12/31/2018 bank data; 2017 aggregate data.

Columbiana AA

January 1, 2016 – December 31, 2016

Bank Originated or Purchased HMDA Loans

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																2016		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Columbiana County	18	2,202	100	0.00	0.00	0.00	20.82	38.89	16.03	73.63	61.11	77.83	5.55	0.00	6.14	0.00	0.00	0.00
Total	18	2,202	100	0.00	0.00	0.00	20.82	38.89	16.03	73.63	61.11	77.83	5.55	0.00	6.14	0.00	0.00	0.00

Source: 2010 U.S Census; 01/01/2016 – 12/31/2016 bank data; 2016 aggregate data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																2016		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Columbiana County	18	2,202	100	22.02	5.56	7.54	20.59	22.22	19.77	21.02	5.56	23.71	36.36	55.56	34.45	0.00	11.11	14.53
Total	18	2,202	100	22.02	5.56	7.54	20.59	22.22	19.77	21.02	5.56	23.71	36.36	55.56	34.45	0.00	11.11	14.53

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 bank data; 2016 aggregate data.

Other Brokered Home Mortgage Loans

Table O: Assessment Area Distribution of Other Brokered Home Mortgage Loans by Income Category of the Geography																	2016		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Columbiana County	22	3,330	100	0.00	0.00	0.00	20.82	13.64	16.03	73.63	86.36	77.83	5.55	0.00	6.14	0.00	0.00	0.00	
Total	22	3,330	100	0.00	0.00	0.00	20.82	13.64	16.03	73.63	86.36	77.83	5.55	0.00	6.14	0.00	0.00	0.00	

Source: 2010 U.S Census; 01/01/2016 – 12/31/2016 bank data. 2016 aggregate data.

Table P: Assessment Area Distribution of Other Brokered Home Mortgage Loans by Income Category of the Borrower																	2016		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
Columbiana County	22	3,330	100	22.02	27.27	7.54	20.59	13.64	19.77	21.02	18.18	23.71	36.36	40.91	34.45	0.00	0.00	14.53	
Total	22	3,330	100	22.02	27.27	7.54	20.59	13.64	19.77	21.02	18.18	23.71	36.36	40.91	34.45	0.00	0.00	14.53	

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 bank data. 2016 aggregate data.

Small Loans to Businesses

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography												2016	
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbiana County	2	905	100	0.00	0.00	17.21	50.00	75.72	50.00	7.07	0.00	0.00	0.00
Total	2	905	100	0.00	0.00	17.21	50.00	75.72	50.00	7.07	0.00	0.00	0.00

Source: 2016 D&B data; 01/01/2016 - 12/31/2016 bank data. 2016 aggregate small loans to businesses lending throughout the AA: Low-income tracts – 0.00; Moderate-income tracts – 14.96; Middle-income tracts – 76.72; and Upper-income tracts – 8.31.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
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	
Columbiana County	2	905	100	NA	81.38	50.00	49.63	6.26	50.00	12.37	0.00	
Total	2	905	100	NA	81.38	50.00	49.63	6.26	50.00	12.37	0.00	

Source: 2016 D&B data; 01/01/2016 - 12/31/2016; 2016 aggregate data.

January 1, 2017 – December 31, 2018

Bank Originated or Purchased HMDA Loans

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2017 - 2018		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Columbiana County	28	3,261	100	0.00	0.00	0.00	5.67	0.00	4.48	82.01	89.29	82.64	12.33	10.71	12.88	0.00	0.00	0.00	
Total	28	3,261	100	0.00	0.00	0.00	5.67	0.00	4.48	82.01	89.29	82.64	12.33	10.71	12.88	0.00	0.00	0.00	

Source: 2015 ACS data; 01/01/2017 – 12/31/2018 bank data; 2017 aggregate data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2017 - 2018		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
Columbiana County	28	3,261	100	20.87	7.14	8.35	18.96	10.72	25.00	21.68	25.00	22.25	38.58	32.14	30.70	0.00	25.00	13.70	
Total	28	3,261	100	20.87	7.14	8.35	18.96	10.72	25.00	21.68	25.00	22.25	38.58	32.14	30.70	0.00	25.00	13.70	

Source: 2015 ACS data; 01/01/2017 - 12/31/2018 bank data; 2017 aggregate data.

Other Brokered Home Mortgage Loans

Table O: Assessment Area Distribution of Other Brokered Home Mortgage Loans by Income Category of the Geography																2017 - 2018		
	Total Home Mortgage			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Columbiana County	41	5,538	100	0.00	0.00	0.00	5.67	0.00	4.48	82.01	87.81	82.64	12.33	12.19	12.88	0.00	0.00	0.00
Total	41	5,538	100	0.00	0.00	0.00	5.67	0.00	4.48	82.01	87.81	82.64	12.33	12.19	12.88	0.00	0.00	0.00

Source: 2015 ACS data; 01/01/2017 – 12/31/2018 bank data; 2017 aggregate data.

Table P: Assessment Area Distribution of Other Brokered Home Mortgage Loans by Income Category of the Borrower																2017 - 2018		
	Total Home Mortgage			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Columbiana County	41	5,538	100	20.87	7.32	8.35	18.96	19.51	25.00	21.68	17.07	22.25	38.58	56.10	30.70	0.00	0.00	13.70
Total	41	5,538	100	20.87	7.32	8.35	18.96	19.51	25.00	21.68	17.07	22.25	38.58	56.10	30.70	0.00	0.00	13.70

Source: 2015 ACS data; 01/01/2017 - 12/31/2018 bank data; 2017 aggregate data.

Small Loans to Businesses

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography												2017 - 2018	
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbiana County	0	0.00	100	0.00	0.00	4.62	0.00	79.87	0.00	15.51	0.00	0.00	0.00
Total	0	0.00	100	0.00	0.00	4.62	0.00	79.87	0.00	15.51	0.00	0.00	0.00

Source: 2017 D&B data; 01/01/2016 - 12/31/2016 bank data; 2017 aggregate small loans to businesses lending throughout the AA: Low-income tracts – 0.00; Moderate-income tracts – 2.19; Middle-income tracts – 82.14; and Upper-income tracts – 15.67.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017 - 2018	
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	
Columbiana County	0	0.00	100	NA	79.76	0.00	50.04	6.88	0.00	13.36	0.00	
Total	0	0.00	100	NA	79.76	0.00	50.04	6.88	0.00	13.36	0.00	

Source: 2017 D&B data; 01/01/2016 - 12/31/2016; 2017 aggregate data.

Jefferson AA (Limited Scope)

2016

CNB had no branch offices located in Jefferson County during 2016. The branch was opened on May 8, 2017.

May 8, 2017 – December 31, 2018

Bank Originated or Purchased HMDA Loans

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																May 8, 2017 – December 31, 2018		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Jefferson County	3	404	100	0.00	0.00	0.00	8.14	0.00	6.93	84.18	100.00	88.22	7.68	0.00	4.85	0.00	0.00	0.00
Total	3	404	100	0.00	0.00	0.00	8.14	0.00	6.93	84.18	100.00	88.22	7.68	0.00	4.85	0.00	0.00	0.00

Source: 2015 ACS data; 05/08/17 – 12/31/2018 bank data; 2017 aggregate data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																May 8, 2017 – December 31, 2018		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Jefferson County	3	404	100	14.17	0.00	4.62	17.88	33.33	20.32	24.40	0.00	26.10	43.54	66.67	36.26	0.00	0.00	12.70
Total	3	404	100	14.17	0.00	4.62	17.88	33.33	20.32	24.40	0.00	26.10	43.54	66.67	36.26	0.00	0.00	12.70

Source: 2015 ACS data; 05/08/2017 - 12/31/2018 bank data; 2017 aggregate data.

Other Brokered Home Mortgage Loans

Table O: Assessment Area Distribution of Other Brokered Home Mortgage Loans by Income Category of the Geography																May 8, 2017 – December 31, 2018		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Jefferson County	6	367	100	0.00	0.00	0.00	8.14	0.00	6.93	84.18	83.33	88.22	7.68	16.67	4.85	0.00	0.00	0.00
Total	6	367	100	0.00	0.00	0.00	8.14	0.00	6.93	84.18	83.33	88.22	7.68	16.67	4.85	0.00	0.00	0.00

Source: 2015 ACS data; 05/08/17 – 12/31/2018 bank data; 2017 aggregate data.

Table P: Assessment Area Distribution of Other Brokered Home Mortgage Loans by Income Category of the Borrower																May 8, 2017 – December 31, 2018		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Jefferson County	6	367	100	14.17	0.00	4.62	17.88	33.33	20.32	24.40	50.00	26.10	43.54	16.67	36.26	0.00	0.00	12.70
Total	6	367	100	14.17	0.00	4.62	17.88	33.33	20.32	24.40	50.00	26.10	43.54	16.67	36.26	0.00	0.00	12.70

Source: 2015 ACS data; 05/08/2017 - 12/31/2018 bank data; 2017 aggregate data.

Small Loans to Businesses

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography												May 8, 2017 – December 31, 2018	
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Jefferson County	2	347	100	0.00	0.00	10.88	0.00	84.35	100.00	4.76	0.00	0.00	0.00
Total	2	347	100	0.00	0.00	10.88	0.00	84.35	100.00	4.76	0.00	0.00	0.00

Source: 2017 D&B data; 05/08/2017 - 12/31/2018 bank data; 2017 aggregate small loans to businesses lending throughout the AA: Low-income tracts – 0.00; Moderate-income tracts – 5.94; Middle-income tracts – 89.50; and Upper-income tracts – 4.57.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											May 8, 2017 – December 31, 2018	
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	
Jefferson County	2	347	100	NA	81.67	50.00	42.47	4.33	50.00	14.00	0.00	
Total	2	347	100	NA	81.67	50.00	42.47	4.33	50.00	14.00	0.00	

Source: 2017 D&B data; 05/08/2017 - 12/31/2018 bank data; 2017 aggregate data.