



PUBLIC DISCLOSURE

September 5, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Citizens National Bank of Bluffton
Charter Number: 11573

102 South Main Street
Bluffton, OH 45817

Office of the Comptroller of the Currency

Central Ohio – Indiana Office
Metro Place V
655 Metro Place South, Suite 625
Dublin, OH 43017

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on the state of Ohio rating and the following overall conclusions:
 - A majority of the bank's loans are inside its assessment areas (AAs).
 - The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes.
 - The bank exhibits a reasonable geographic distribution of loans in its AAs.
- The Community Development (CD) Test rating is based on the state of Ohio rating. The bank's CD lending represents excellent responsiveness to CD needs, considering the bank's capacity and the need and availability of such opportunities for CD in the AAs. The Office of the Comptroller of the Currency (OCC) placed more weight on CD lending given the opportunities for CD during the recent pandemic.

Loan-to-Deposit Ratio

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

The Citizens National Bank of Bluffton's (CNB or bank) LTD ratio over the 11 quarters since the previous Community Reinvestment Act (CRA) evaluation (June 30, 2020, to December 31, 2022) is 101.9 percent. The ratio ranged from a low of 92.5 percent as of March 31, 2022, to a high of 112.4 percent as of June 30, 2020. The bank's average LTD ratio of 101.9 percent is more than reasonable when compared to other financial institutions of similar size and location (total assets between \$100 million and \$1.4 billion and bank offices in the AAs). The bank's LTD ratio ranks second highest among a total of 15 similarly situated financial institutions in the AAs. The other 15 financial institutions had an average LTD ratio of 70.5 percent, ranging from 39.8 percent to 118.6 percent.

Lending in Assessment Area

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

The bank originated and purchased 76.1 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,775	77.0	529	23.0	2,304	291,554	66.5	146,699	33.5	438,253
Small Business	673	74.3	233	25.7	906	163,867	71.4	65,731	28.6	229,598
Small Farm	509	75.1	169	24.9	678	69,945	69.1	31,226	30.9	101,171
Total	2,957	76.1	931	23.9	3,888	525,366	68.3	243,656	31.7	769,022

*Source: 1/1/20 – 12/31/22 Bank Data (Home Mortgage Disclosure Act (HMDA) data and CRA loan data).
Due to rounding, totals may not equal 100.0%.*

Description of Institution

CNB is an intrastate community bank, which is wholly owned by Citizens Bancshares, Inc., a one-bank holding company. Both the main office and holding company are headquartered in Bluffton, Ohio, approximately 85 miles northwest of Columbus, Ohio. As of December 31, 2022, total assets were \$969.4 million with \$773.4 million in net loans, \$727 million in total deposits, and \$110.4 million in tier 1 capital. Net loans represent approximately 80 percent of total assets. There was no merger or acquisition activity that affected the scope of the bank’s operations during the evaluation period.

CNB has 11 banking offices in Ohio, with nine full-service offices and two independent drive-thru facilities. The bank has offices in Bluffton, Lima, Elida, Van Wert, Celina, Findlay, Defiance, Springfield, and Toledo. The bank operates eight automated teller machines (ATMs) at the offices or drive-thru facilities. The only office without an ATM is the Springfield branch. There is no ATM at the Bluffton main office or Lima branch, but there is an ATM at the independent drive-thru facilities in Bluffton and Lima. The Lima branch and independent drive-thru and Springfield branch are in moderate-income census tracts (CTs). The Defiance branch was in moderate-income CT as of the 2015 American Community Survey (ACS) U.S. Census and the classification of this CT changed to middle-income as of the 2020 U.S. Census. All other offices are in middle- or upper-income geographies. No offices have been opened or closed since the previous CRA evaluation. Additionally, the bank has a loan production office in Columbus, Ohio, that primarily generates participation loans.

CNB is a single-state financial institution with one rating area (Ohio) and four AAs. The AAs meet the requirements of the regulation and do not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income (LMI) areas. The AAs are further described in the “Scope of Evaluation” and “Description of Institution’s Operations in Ohio” sections of this performance evaluation. The AAs include the following:

- Allen County, Ohio, in the Lima, Ohio Metropolitan Statistical Area (MSA) 30620 (Lima MSA AA).
- Defiance, Hancock, Mercer, Paulding, Putnam, and Van Wert Counties (entire counties) and CTs 401 and 402 in Auglaize County, Ohio, in a non-MSA AA (Non-MSA AA).
- Clark County, Ohio, in the Springfield, Ohio MSA 44220 (Springfield MSA AA).

- Lucas County, Ohio, in the Toledo, Ohio MSA 45780 (Toledo MSA AA).

Management offers a variety of standard lending and deposit products and services through their full-service banking offices to accommodate their customers, including online and mobile banking. CNB also offers savings and money market accounts to depositors across the country through cnbbankdirect.com, totaling approximately \$1.9 million (36 accounts) as of December 31, 2022. Loan products are not offered through this internet site.

As of the December 31, 2022, Consolidated Report of Condition and Income (Call Report), the bank's loan portfolio is comprised of 18.9 percent residential real estate loans (home mortgage), 63.4 percent commercial and industrial loans and commercial real estate loans (business), 17.3 percent agriculture loans (farm), and 0.4 percent consumer loans. The bank's loan originations and purchases, based on the number of loans originated and purchased during the evaluation period, are approximately 58.3 percent residential real estate, 10.3 percent business, 13.7 percent farm, and 17.7 percent consumer loans. The bank's loan originations and purchases, based on the dollar amount of loans originated and purchased during the evaluation period, are approximately 52.3 percent residential real estate, 11.1 percent business, 32.2 percent farm, and 4.4 percent consumer loans. CNB's primary business focus is home mortgage, business, and farm lending. During the evaluation period, the bank sold approximately \$317 million in home mortgage loans to the secondary market.

The COVID-19 pandemic in 2020 impacted the local economy, including unemployment data. The Small Business Administration's (SBA) Paycheck Protection Program (PPP) provided loans to help businesses keep their workforces employed during the pandemic. The bank was particularly responsive to the SBA's PPP and originated a significant volume of PPP loans in 2020 and 2021. In 2020, the bank originated 726 SBA PPP loans totaling \$100.2 million. In 2021, the bank originated 979 SBA PPP loans totaling \$47 million. Of the 979 loans originated in 2021, 29 loans totaling \$1.5 million were originated outside the state of Ohio. Refer to the CD Test for additional information on the SBA PPP loans originated in 2021 that qualified as CD loans.

CNB's lending activities are consistent with its size, expertise, financial capability, and local economic conditions. There are no legal, financial, or other factors that affect its ability to help meet the credit needs of its AAs. CNB received a Satisfactory rating for its CRA performance during the prior evaluation period. This rating was reported in the OCC's CRA Performance Evaluation dated July 6, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC conducted a CRA performance evaluation to assess the bank's record of meeting the credit and CD needs of its entire community, including LMI areas. The OCC used intermediate small bank CRA evaluation procedures to assess the bank's performance under the Lending and CD Tests. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2020, to December 31, 2022. A separate analysis was conducted for each AA.

The OCC evaluated the bank’s lending performance based on its primary lending products, home mortgage, small business, and small farm lending. While the bank offers other lending products, these products were not primary products during the evaluation period. As a result, the OCC did not consider these as part of the performance evaluation, as an analysis of this data would not be meaningful. CNB’s primary lending products are discussed under the “Description of Institution” section in this report. For the Lending Test, the OCC evaluated all home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) for 2020, 2021, and 2022 and all small business and small farm loans reported under the CRA for 2020, 2021, and 2022. The OCC relied on internal bank reports for the CD test.

For analysis purpose, the OCC compared the bank’s lending performance with demographic data from the 2015 ACS U.S. Census for 2020 and 2021, the 2020 U.S. Census for 2022, and 2021 and 2022 Dun and Bradstreet (D&B) data. There are two sets of tables in Appendix D for the different census periods. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

Selection of Areas for Full-Scope Review

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

CNB has four AAs in Ohio, as described in the “Description of Institution” and “Description of Institution’s Operations in Ohio” sections of this evaluation. The OCC completed a full-scope review of the Lima MSA AA, Toledo MSA AA, and the Non-MSA AA and a limited-scope review of the Springfield MSA AA.

Ratings

The bank’s overall rating is based on the state of Ohio rating. CNB operates all branches in a single state. Since all branches are in Ohio, its overall rating is based on performance solely in Ohio. The state of Ohio rating is based on performance in all four AAs.

Of the home mortgage, small business, and small farm loans originated or purchased inside the AAs during the evaluation period, over 90 percent were in the Lima MSA AA and Non-MSA AA. According to the Federal Deposit Insurance Corporation’s (FDIC) Deposit Market Share Reports as of June 30, 2022, 48.9 percent of the bank’s total deposits were in the Lima MSA AA, with 43.9 percent in the Non-MSA AA.

Home mortgage, small business, and small farm loans are the bank’s primary lending products. However, small farm loans are not a primary product in the Toledo MSA AA. The Toledo office

has business lenders, but no agriculture lenders. The primary products in the Toledo MSA AA are home mortgage and small business loans. Management also stated that there are no retail lenders in the Springfield MSA AA, and the majority of the loans originated out of this office are outside the AA.

The Lima MSA AA and Non-MSA AA are weighted heavier than the Toledo MSA AA and Springfield MSA AA as the bank has a larger retail presence in these two AAs. The majority of the loans and deposits are in these two AAs. Additionally, 58.3 percent of loan originations and purchases, based on the number of loans originated or purchased during the evaluation period, were home mortgage loans. Given this, the OCC placed more weight on home mortgage lending. Refer to the “Scope of the Evaluation” section under the state of Ohio section for more details.

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 Consumer Financial Protection Bureau, as applicable.

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

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

State Rating

State of Ohio

CRA rating for the State of Ohio: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- CNB exhibits a reasonable geographic distribution of loans in the state.
- CNB exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes.
- The bank has not received any complaints about its performance in helping to meet the AAs' credit needs during the evaluation period.
- The bank's responsiveness to CD needs of the AAs through CD lending is overall excellent.

Description of Institution's Operations in Ohio

CNB has four AAs in northwestern Ohio: Lima MSA AA, Non-MSA AA, Toledo MSA AA, and the Springfield MSA AA. The AAs meet the requirements of the regulation and do not reflect illegal discrimination or arbitrarily exclude any LMI areas. Management selected the AAs based on their targeted lending territory, the area with the most deposit and lending activity, and office locations. The OCC completed a full-scope review of each AA except the Springfield MSA AA in which a limited-scope review was completed. Each AA is described below.

As of the 2015 ACS U.S. Census data, four banking offices/independent drive-thru facilities are in moderate-income CTs, two are in middle-income, and five are in upper-income CTs. As of the 2020 U.S. Census data, three are in moderate-income CTs, four are in middle-income CTs, and four are in upper-income CTs. The Celina branch moved from an upper-income CT as of the 2015 ACS U.S. Census to a middle-income CT as of the 2020 U.S. Census. The Defiance branch changed from a moderate-income tract as of the 2015 ACS U.S. Census to a middle-income tract as of the 2020 U.S. Census.

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

Lima MSA AA

The Lima MSA AA consists of Allen County, Ohio, in the Lima, Ohio MSA 30620. The Lima MSA 30620 includes Allen County, with no other counties in the MSA. Lima is the county seat of Allen County and is in northwestern Ohio. CNB operates five offices in the AA which includes the main office and an independent drive-thru facility in Bluffton, a branch and drive-thru facility in Lima, and a branch in Elida. The Lima offices are in a moderate-income CT, with the remaining offices in upper-income CTs. There is an ATM at the Bluffton drive-thru, Lima drive-thru, and Elida office.

Demographic Information of the Assessment Area						
Assessment Area: Lima MSA AA (2020 – 2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	12.1	24.2	42.4	21.2	0.0
Population by Geography	105,196	6.7	18.5	47.6	27.2	0.0
Housing Units by Geography	44,859	7.5	20.1	46.5	25.9	0.0
Owner-Occupied Units by Geography	26,883	2.7	12.8	52.7	31.9	0.0
Occupied Rental Units by Geography	13,103	13.9	29.8	38.2	18.1	0.0
Vacant Units by Geography	4,873	17.2	33.9	34.6	14.4	0.0
Businesses by Geography	6,235	4.7	19.4	44.0	31.9	0.0
Farms by Geography	316	0.6	5.4	74.4	19.6	0.0
Family Distribution by Income Level	26,203	21.7	17.0	21.6	39.7	0.0
Household Distribution by Income Level	39,986	24.7	15.9	16.9	42.5	0.0
Median Family Income MSA - 30620 Lima, OH MSA		\$56,195	Median Housing Value			\$99,008
			Median Gross Rent			\$647
			Families Below Poverty Level			12.7%
<i>Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Information of the Assessment Area						
Assessment Area: Lima MSA AA (2022)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	14.3	25.7	40.0	20.0	0.0
Population by Geography	102,206	8.5	24.9	43.9	22.8	0.0
Housing Units by Geography	45,126	9.9	27.2	41.8	21.0	0.0
Owner-Occupied Units by Geography	27,373	5.1	18.7	50.3	25.9	0.0
Occupied Rental Units by Geography	13,652	15.8	42.8	27.6	13.8	0.0
Vacant Units by Geography	4,101	22.6	32.4	32.7	12.3	0.0
Businesses by Geography	9,192	7.5	26.2	41.4	24.9	0.0
Farms by Geography	455	2.2	6.8	74.9	16.0	0.0
Family Distribution by Income Level	25,580	19.2	19.0	22.4	39.5	0.0
Household Distribution by Income Level	41,025	24.0	17.2	17.0	41.8	0.0
Median Family Income MSA - 30620 Lima, OH MSA		\$64,913	Median Housing Value			\$113,770
			Median Gross Rent			\$721
			Families Below Poverty Level			9.5%
<i>Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the Lima MSA AA is 105,196, with 6.7 percent of the population living in low-income CTs, 18.5 percent in moderate-income CTs, 47.6 percent in middle-income CTs, and 27.2 percent in upper-income CTs. As of the 2015 ACS U.S. Census, the AA consists of 33 CTs, and is comprised of four low-income, eight moderate-income, 14 middle-income, and seven upper-income. The AA includes 26,203 families and 39,986 households.

There were CT classification changes in the AA during the evaluation period between the 2015 ACS U.S. Census and the 2020 U.S. Census. As of the 2020 U.S. Census data in the table above, the population of the Lima MSA AA is 102,206, with 8.5 percent of the population living in low-income CTs, 24.9 percent in moderate-income CTs, 43.9 percent in middle-income CTs, and 22.8 percent in upper-income CTs. As of the 2020 U.S. Census, the AA consists of 35 CTs, and is comprised of five low-income, nine moderate-income, 14 middle-income, and seven upper-income. The AA includes 25,580 families and 41,025 households.

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value is \$99,008. With the median family income of \$56,195, moderate-income families make less than \$44,956 annually and low-income families make less than \$28,098 annually. Median housing values are 2.2 times the annual income of moderate-income families and 3.5 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among low-income families. The 2015 ACS U.S. Census data show that there are 44,859 total housing units in the Lima MSA AA, of which 59.9 percent are owner-occupied, 29.2 percent are rental-occupied, and 10.9 percent are vacant units. As of the 2015 ACS U.S. Census, 1962 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 59 years. Additionally, the median age of housing stock in low-income CTs was 77 years and 69 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 12.7 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

According to the 2020 U.S. Census data, the median housing value is \$113,770. With the median family income of \$64,913, moderate-income families make less than \$51,930 annually and low-income families make less than \$32,457 annually. Median housing values are 2.2 times the annual income of moderate-income families and 3.5 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among low-income families. The 2020 U.S. Census data show that there are 45,126 total housing units in the Lima MSA AA, of which 60.7 percent are owner-occupied, 30.2 percent are rental occupied, and 9.1 percent are vacant units. As of the 2020 U.S. Census, 1962 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 60 years. Additionally, the median age of housing stock in low-income CTs was 79 years and 65 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 9.5 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

Job Market and Economic Conditions

The economic conditions in the Lima MSA AA have improved since the start of the COVID-19 pandemic. The unemployment rate in Allen County and the state and national unemployment rates experienced a spike in 2020 followed by a gradual recovery through the end of 2021. According to the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information as of December 2022, the “not seasonally adjusted” unemployment rate was 3.7 percent in Allen County, which is reasonable when compared with the state of Ohio unemployment rate of 3.6 percent and the national unemployment rate of 3.3 percent for the same period.

According to Moody’s Analytics as of October 2022, Lima’s economy is starting to move in the right direction. There are many diversified industries playing a significant role in supporting employment within the AA. Primary industries include, but are not limited to, healthcare,

education, agriculture, and manufacturing. Primary employers include Mercy Health/St. Rita's Medical Center, Ford Motor Company, Lima Memorial Health System, DTR Industries Inc., and Procter & Gamble Manufacturing Company.

Competition

Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks and branches of larger financial institutions. According to the June 30, 2022, Deposit Market Share Report from the FDIC, 11 financial institutions with 29 offices operated in Allen County. CNB held the second largest deposit market share at 14.9 percent as of June 30, 2022, with \$358 million in total deposits. This represents 49 percent of the bank's total deposits. The bank's primary competitors include financial institutions with significant deposit activity in the AA such as JPMorgan Chase Bank, National Association (N.A.), Premier Bank, Huntington National Bank and Union Bank Company, with these four holding almost 68 percent of the deposit market share.

As stated above, CNB's primary business focus includes home mortgage, small business, and small farm lending. Strong competition for home mortgage loans exists in the AA. Based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data, CNB ranked second out of 163 lenders in the Lima MSA AA in residential home mortgage volume. As of the 2021 Peer Mortgage Data Report, CNB had 7 percent of the lending market share, based on the number of loans, lending \$45 million (267 loans). Top mortgage lenders in the AA included Superior Credit Union, Inc., Rocket Mortgage, and Huntington National Bank, with a combined market share of almost 39 percent. During the evaluation period, 46.2 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Lima MSA AA for 2020 and 2021.

Based on 2022 Peer Mortgage Data and 2020 U.S. Census data, CNB ranked third out of 166 lenders in the Lima MSA AA in residential home mortgage volume. CNB had 5.4 percent of the lending market share, based on the number of loans, lending almost \$24 million (154 loans). Top mortgage lenders in the AA included Superior Credit Union, Inc. and Union Bank Company, with a combined market share of almost 37 percent. During the evaluation period, 48.9 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Lima MSA AA for 2022.

Although not required by regulation, the bank reports small business loans under CRA loan data. There is strong competition for small business loans in the AA. As of the 2021 Peer Small Business Data Report, there were 52 lenders originating or purchasing small business loans in the Lima MSA AA. The top three lenders included JPMorgan Chase Bank, N.A., American Express National Bank, and U.S. Bank, N.A., with a combined market share of 42.2 percent. Based on the number of loans originated or purchased, CNB ranked eighth out of 52 lenders in the Lima MSA AA in small business lending, with 4.2 percent of the lending market share (55 loans). Based on the dollar amount of loans originated or purchased, CNB ranked first out of 52 lenders in the Lima MSA AA in small business lending, with 26.6 percent of the lending market share (\$17.6 million). During the evaluation period, 27.7 percent of the bank's small business loan originations and purchases inside the AAs were in the Lima MSA AA for 2020 and 2021 and 27.5 percent for 2022.

The bank also reports small farm loans under CRA loan data. As of the 2021 Peer Small Farm Data Report, there were 12 lenders originating or purchasing 131 small farm loans in the Lima MSA AA. Based on the number of loans originated or purchased, CNB ranked first out of 12 lenders in the Lima MSA AA in small farm lending, with 38.2 percent of the lending market share. The bank originated 50 loans totaling \$6.6 million in 2021. The top three lenders, behind CNB, included Premier Bank, First Financial Bank, and U.S. Bank, N.A, with a combined market share of 38 percent. During the evaluation period, 33.3 percent of the bank’s small business loan originations and purchases inside the AAs were in the Lima MSA AA for 2020 and 2021 and 29.6 percent in 2022.

Community Contacts/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information provided from one interview with a representative from an affordable housing organization. The contact identified the following as needs and opportunities in the AA:

- Small dollar mortgage products.
- First time homeownership mortgages.
- Grants for homeownership and financial literacy counseling.
- Affordable retail products.

Non-MSA AA

The Non-MSA AA consists of the entire counties of Defiance, Hancock, Mercer, Paulding, Putnam, and Van Wert, and CTs 401 and 402 in Auglaize County, Ohio. The Non-MSA AA adjoins the Lima MSA AA. CNB operates four full-service branches including drive-thru facilities within the Non-MSA AA, with one branch in each Van Wert, Mercer, Hancock, and Defiance counties. All branches have ATM access. The Defiance branch was in a moderate-income CT as of the 2015 ACS U.S. Census and is now in a middle-income CT as of the 2020 U.S. Census. The Celina branch in Mercer County was in an upper -income CT as of the 2015 ACS U.S. Census and is now in a middle-income CT as of the 2020 U.S. Census. The Van Wert branch is in a middle-income CT and the Findlay branch in Hancock County is in an upper-income CT.

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA (2020 – 2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	0.0	5.6	55.6	38.9	0.0
Population by Geography	245,335	0.0	6.1	49.5	44.5	0.0
Housing Units by Geography	106,206	0.0	6.2	51.4	42.4	0.0
Owner-Occupied Units by Geography	73,531	0.0	3.8	49.7	46.4	0.0
Occupied Rental Units by Geography	24,149	0.0	13.1	52.4	34.5	0.0
Vacant Units by Geography	8,526	0.0	6.8	63.2	30.0	0.0
Businesses by Geography	14,151	0.0	7.3	49.0	43.6	0.0

Farms by Geography	1,857	0.0	1.2	41.4	57.5	0.0
Family Distribution by Income Level	66,829	14.2	16.4	22.4	47.0	0.0
Household Distribution by Income Level	97,680	18.6	16.1	17.7	47.6	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$119,862
			Median Gross Rent			\$664
			Families Below Poverty Level			7.8%
<p><i>Source: 2015 ACS and 2021 D&B Data.</i> <i>Due to rounding, totals may not equal 100.0%.</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA (2022)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	0.0	8.8	63.2	28.1	0.0
Population by Geography	245,889	0.0	5.5	61.1	33.4	0.0
Housing Units by Geography	108,423	0.0	5.8	63.8	30.4	0.0
Owner-Occupied Units by Geography	75,440	0.0	3.8	62.2	34.1	0.0
Occupied Rental Units by Geography	24,052	0.0	10.9	66.1	23.0	0.0
Vacant Units by Geography	8,931	0.0	8.6	72.0	19.4	0.0
Businesses by Geography	21,603	0.0	8.5	56.3	35.2	0.0
Farms by Geography	2,459	0.0	2.5	52.7	44.8	0.0
Family Distribution by Income Level	66,653	13.8	16.5	22.9	46.8	0.0
Household Distribution by Income Level	99,492	18.0	15.3	19.3	47.4	0.0
Median Family Income Non-MSAs - OH		\$66,684	Median Housing Value			\$138,528
			Median Gross Rent			\$730
			Families Below Poverty Level			6.2%
<p><i>Source: 2020 U.S. Census and 2022 D&B Data.</i> <i>Due to rounding, totals may not equal 100.0%.</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the Non-MSA AA is 245,335, with 6.1 percent of the population living in moderate-income CTs, 49.5 percent in middle-income CTs, and 44.5 percent in upper-income CTs. As of the 2015 ACS U.S. Census, the AA consists of 54 CTs, and is comprised of three moderate-income, 30 middle-income, and 21 upper-income CTs. The AA includes 66,829 families and 97,680 households.

There were CT classification changes in the AA during the evaluation period between the 2015 ACS U.S. Census and the 2020 U.S. Census. As of the 2020 U.S. Census data in the table above, the population of the Non-MSA AA is 245,889, with 5.5 percent of the population living in moderate-income CTs, 61.1 percent in middle-income CTs, and 33.4 percent in upper-income CTs. As of the 2020 U.S. Census, the AA consists of 57 CTs, and is comprised of five moderate-income, 36 middle-income, and 16 upper-income CTs. The AA includes 66,653 families and 99,492 households.

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value is \$119,862. With the median family income of \$55,785, moderate-income families make less than \$44,628 annually and low-income families make less than \$27,893 annually. Median housing values are 2.7 times the annual income of moderate-income families and 4.3 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among low-income families. The 2015 ACS U.S. Census data show that there are 106,206 total housing units in the Non-MSA AA, of which 69.2 percent are owner-occupied, 22.8 percent are rental-occupied, and 8 percent are vacant units. As of the 2015 ACS U.S. Census, 1967 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 54 years. Additionally, the median age of housing stock in moderate-income CTs was 67 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 7.8 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

According to the 2020 U.S. Census data, the median housing value is \$138,528. With the median family income of \$66,684, moderate-income families make less than \$53,347 annually and low-income families make less than \$33,342 annually. Median housing values are 2.6 times the annual income of moderate-income families and 4.2 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among low-income families. The 2020 U.S. Census data show that there are 108,423 total housing units in the Non-MSA AA, of which 69.6 percent are owner-occupied, 22.2 percent are rental occupied, and 8.2 percent are vacant units. As of the 2020 U.S. Census, 1967 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 55 years. Additionally, the median age of housing stock in moderate-income CTs was 70 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 6.2 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

Job Market and Economic Conditions

The economic conditions in the Non-MSA AA have improved since the start of the COVID-19 pandemic. The unemployment rates in the Non-MSA AA and the state and national unemployment rates experienced a spike in 2020 followed by a gradual recovery through the end of 2021. According to the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information as of December 2022, the “not seasonally adjusted” unemployment rate for the counties in the Non-MSA AAA are reasonable when compared with the state and the national unemployment rates for the same period.

Unemployment Rates as of December 2022	
Auglaize County	2.4 percent
Defiance County	3.4 percent
Hancock County	2.7 percent
Mercer County	2.1 percent
Paulding County	2.7 percent
Putnam County	2.8 percent
Van Wert County	2.7 percent
State of Ohio	3.6 percent
United States	3.3 percent
<i>Source: Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information as of December 2022.</i>	

The counties in the Non-MSA AA are supported by a diverse mix of companies across many industries, including manufacturing, government, agriculture, and the service industry. Primary employers in Defiance County include Defiance Metal Products Company and General Motors. Primary employers in Hancock County include Marathon Petroleum Corporation and Cooper Tire & Rubber Company. Primary employers in Mercer County include Celina City Schools and Celina Aluminum Precision Technology. Primary employers in Paulding County include the local school systems and Cooper Farms Inc. Primary employers in Putnam County include Kalida Manufacturing Inc., Progressive Stamping Inc., and Pro-Tec Coating Company. Primary employers in Van Wert County include Danfoss, Cooper Farms, Tenneco, Ohio Health – Van Wert Hospital, and Central Mutual Insurance Company.

Competition

Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks and branches of larger financial institutions. According to the June 30, 2022, Deposit Market Share Report from the FDIC, 31 financial institutions with 109 offices operated in the Non-MSA AA. CNB held the 11th largest deposit market share at 4 percent as of June 30, 2022, with \$322 million in total deposits. This represents 44 percent of the bank’s total deposits. The bank’s primary competitors include financial institutions with significant deposit activity in the AA such as Premier Bank, Fifth Third Bank, N.A., First Financial Bank, Peoples Bank Co., and Huntington National Bank, with these five holding almost 46 percent of the deposit market share.

As stated above, CNB's primary business focus includes home mortgage, small business, and small farm lending. Strong competition for home mortgage loans also exists in this AA. Based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data, CNB ranked 10th out of 280 lenders in the Non-MSA AA in residential home mortgage volume. As of the 2021 Peer Mortgage Data Report, CNB had 3 percent of the lending market share, based on the number of loans, lending approximately \$40.7 million. Top mortgage lenders in the AA included Premier Bank, Loandepot.com, LLC, Huntington National Bank, Superior Credit Union, Inc., and Rocket Mortgage, with a combined market share of almost 43 percent. During the evaluation period, 47.7 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Non-MSA AA for 2020 and 2021.

Based on 2022 Peer Mortgage Data and 2020 U.S. Census data, CNB ranked 10th out of 255 lenders in the Non-MSA AA in residential home mortgage volume. Based on the number of loans, CNB had 2.4 percent of the lending market share. Top mortgage lenders in the AA included Premier Bank, Superior Credit Union, Inc., Huntington National Bank, Loandepost.com, LLC, and Union Bank Co., with a combined market share of almost 43 percent. During the evaluation period, 43.8 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Non-MSA AA for 2022.

Although not required by regulation, the bank reports small business loans under CRA loan data. There is strong competition for small business loans in this AA. As of the 2021 Peer Small Business Data Report, there were 74 lenders originating small business loans in Defiance, Hancock, Mercer, Paulding, Putnam, Van Wert, and Auglaize Counties in Ohio. The top three lenders included Premier Bank, JPMorgan Chase Bank, N.A., and American Express National Bank, with a combined market share of 35.5 percent. Based on the number of loans originated or purchased, CNB ranked 11th out of 74 lenders in the Non-MSA AA in small business lending, with 3.1 percent of the lending market share. Based on the dollar amount of loans originated or purchased, CNB ranked second out of 74 lenders in the Non-MSA AA in small business lending, with 14.1 percent of the lending market share. During the evaluation period, 64.2 percent of the bank's small business loan originations and purchases inside the AAs were in the Non-MSA AA for 2020 and 2021 and 67.1 percent in 2022.

The bank also reports small farm loans under CRA loan data. As of the 2021 Peer Small Farm Data Report, there were 27 lenders originating or purchasing small farm loans in the Non-MSA AA. Based on the number of loans originated or purchased, CNB ranked first out of 27 lenders in the Non-MSA AA in small farm lending, with 14.6 percent of the lending market share. The next three lenders included Park National Bank, John Deere Financial, FSB, and U.S. Bank, N.A., with a combined market share of 34 percent. During the evaluation period, 66.1 percent of the bank's small farm loan originations and purchases inside the AAs were in the Non-MSA AA for 2020 and 2021 and 69.7 percent for 2022.

Community Contacts/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information provided from one interview with a representative from an affordable housing organization. The contact identified the following as needs and opportunities in the AA:

- Small dollar mortgage products.
- First time homeownership mortgages.

- Grants for homeownership and financial literacy counseling.
- Affordable retail products.

Toledo MSA AA

The Toledo MSA AA consists of Lucas County, Ohio, one of four counties in the Toledo, Ohio MSA 45780. The bank's Toledo MSA AA does not include the MSA counties of Fulton, Ottawa, and Wood, as the bank does not have branches in those counties. Toledo is the county seat of Lucas County, in northwestern Ohio. The Toledo branch was opened in April 2018, and is in a middle-income CT. The Toledo branch has an ATM and drive-thru facility.

Demographic Information of the Assessment Area						
Assessment Area: Toledo MSA AA (2020 – 2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	128	27.3	19.5	32.8	19.5	0.8
Population by Geography	436,261	17.1	18.4	36.4	28.1	0.0
Housing Units by Geography	202,269	18.9	19.1	36.8	25.2	0.0
Owner-Occupied Units by Geography	108,258	9.5	16.4	39.5	34.6	0.0
Occupied Rental Units by Geography	69,361	27.2	21.2	36.6	14.9	0.0
Vacant Units by Geography	24,650	36.9	24.9	25.4	12.8	0.0
Businesses by Geography	27,801	16.4	12.2	35.6	35.8	0.0
Farms by Geography	629	7.6	12.1	34.7	45.6	0.0
Family Distribution by Income Level	106,520	26.1	17.1	18.7	38.1	0.0
Household Distribution by Income Level	177,619	28.3	15.8	16.0	40.0	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$60,742	Median Housing Value			\$104,537
			Median Gross Rent			\$671
			Families Below Poverty Level			16.5%
<p><i>Source: 2015 ACS and 2021 D&B Data.</i></p> <p><i>Due to rounding, totals may not equal 100.0%.</i></p> <p><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

Demographic Information of the Assessment Area						
Assessment Area: Toledo MSA AA (2022)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	169	15.4	25.4	27.8	24.3	7.1
Population by Geography	431,279	11.4	22.5	30.2	30.5	5.4
Housing Units by Geography	203,586	14.0	24.0	31.2	25.8	4.9
Owner-Occupied Units by Geography	108,632	6.9	20.4	33.2	36.7	2.9
Occupied Rental Units by Geography	72,840	20.6	28.5	30.1	13.3	7.5
Vacant Units by Geography	22,114	27.2	27.0	25.2	13.8	6.8
Businesses by Geography	50,201	10.1	20.3	26.8	30.5	12.3
Farms by Geography	1,088	7.2	18.5	27.2	39.2	7.9
Family Distribution by Income Level	106,276	25.9	16.8	19.4	38.0	0.0
Household Distribution by Income Level	181,472	27.8	16.1	16.8	39.3	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$70,917	Median Housing Value			\$116,017
			Median Gross Rent			\$753
			Families Below Poverty Level			13.7%
<i>Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the Toledo MSA AA is 436,261, with 17.1 percent of the population living in low-income CTs, 18.4 percent in moderate-income CTs, 36.4 percent in middle-income CTs, and 28.1 percent in upper-income CTs. The AA consists of 128 CTs, and is comprised of 35 low-income, 25 moderate-income, 42 middle-income, 25 upper-income CTs, and one CT in which the geography has not been assigned an income classification (non-applicable). The AA includes 106,520 families and 177,619 households.

There were CT classification changes in the AA during the evaluation period between the 2015 ACS U.S. Census and the 2020 U.S. Census. As of the 2020 U.S. Census data in the table above, the population of the Toledo MSA AA is 431,279, with 11.4 percent of the population living in low-income CTs, 22.5 percent in moderate-income CTs, 30.2 percent in middle-income CTs, 30.5 percent in upper-income CTs, and 5.4 percent in CTs that have not been assigned an income classification. The AA consists of 169 CTs, and is comprised of 26 low-income, 43 moderate-

income, 47 middle-income, 41 upper-income CTs, and 12 CTs in which the geographies have not been assigned an income classification (non-applicable). The AA includes 106,276 families and 181,472 households.

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value is \$104,537. With the median family income of \$60,742, moderate-income families make less than \$48,594 annually and low-income families make less than \$30,371 annually. Median housing values are 2.2 times the annual income of moderate-income families and 3.4 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among low-income families. The 2015 ACS U.S. Census data show that there are 202,269 total housing units in the Toledo MSA AA, of which 53.5 percent are owner-occupied, 34.3 percent are rental-occupied, and 12.2 percent are vacant units. As of the 2015 ACS U.S. Census, 1960 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 61 years. Additionally, the median age of housing stock in low-income CTs was 74 years and 70 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 16.5 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

According to the 2020 U.S. Census data, the median housing value is \$116,017. With the median family income of \$70,917, moderate-income families make less than \$56,734 annually and low-income families make less than \$35,459 annually. Median housing values are two times the annual income of moderate-income families and 3.3 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among some low-income families. The 2020 U.S. Census data show that there are 203,586 total housing units in the Toledo MSA AA, of which 53.3 percent are owner-occupied, 35.8 percent are rental occupied, and 10.9 percent are vacant units. As of the 2020 U.S. Census, 1962 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 60 years. Additionally, the median age of housing stock in low-income CTs was 71 years and 69 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 13.7 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

Job Market and Economic Conditions

The economic conditions in the Toledo MSA AA have improved since the start of the COVID-19 pandemic. The unemployment rate in Lucas County, as well as the state and national unemployment rates, experienced a spike in 2020 followed by a gradual recovery through the end of 2021. According to the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information as of December 2022, the “not seasonally adjusted” unemployment rate for Lucas County of 4.2 is higher than the state of Ohio (3.6 percent) and the national (3.3 percent) unemployment rates for the same period.

According to Moody's Analytics as of February 2023, Toledo's economy is growing and improving, despite higher unemployment rates than the state and national averages as of December 2022. The economy is diversified, with primary industries including healthcare, education, manufacturing, and government. Primary employers in the Toledo MSA AA include ProMedica Health Systems, Mercy Health Partners, and the University of Toledo.

Competition

Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks and branches of larger financial institutions. According to the June 30, 2022, Deposit Market Share Report from the FDIC, 17 financial institutions with 96 offices operated in Lucas County. CNB held the 17th largest deposit market share at 0.13 percent as of June 30, 2022, with \$15.4 million in total deposits. This represents 2 percent of the bank's total deposits. The bank's primary competitors include financial institutions with significant deposit activity in the AA such as Fifth Third Bank, N.A. and Huntington National Bank, with these two holding almost 50 percent of the deposit market share.

CNB's primary business focus in the Toledo MSA AA includes home mortgage and small business lending. Prior to opening the full-service branch in 2018, the bank's focus was commercial real estate loans. Farm loans are not a primary product in this AA. Based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data, CNB ranked 54th out of 345 lenders in the Toledo MSA AA in residential home mortgage volume. CNB had 0.25 percent of the lending market share, based on the number of loans, lending \$8.2 million (42 loans). Top mortgage lenders in the AA included Huntington National Bank, Fifth Third Bank, N.A., and Rocket Mortgage, with a combined market share of almost 29 percent. During the evaluation period, 5.5 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Toledo MSA AA for 2020 and 2021.

Based on 2022 Peer Mortgage Data and 2020 U.S. Census data, CNB ranked 65th out of 326 lenders in the Toledo MSA AA in residential home mortgage volume. CNB had 0.16 percent of the lending market share, based on the number of loans, lending \$4.5 million (18 loans). Top mortgage lenders in the AA included Huntington National Bank, Fifth Third Bank, N.A., and Rocket Mortgage, with a combined market share of almost 28 percent. During the evaluation period, 5.7 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Toledo MSA AA for 2022.

There is strong competition for small business loans in this AA. As of the 2021 Peer Small Business Data Report, there were 99 lenders originating or purchasing small business loans in the Toledo MSA AA. The top three lenders included American Express National Bank, Huntington National Bank, and JPMorgan Chase Bank, N.A, with a combined market share of 34 percent. Based on the number of loans originated or purchased, CNB ranked 35th out of 99 lenders in the Toledo MSA AA in small business lending, with 0.16 percent of the lending market share (12 loans totaling \$3.3 million). During the evaluation period, 6.2 percent of the bank's small business loan originations and purchases inside the AAs were in the Toledo MSA AA for 2020 and 2021 and 3.3 percent in 2022.

As of the 2021 Peer Small Farm Data Report, there were 11 lenders originating or purchasing 54 small farm loans in the Toledo MSA AA. The top three lenders included F&M State Bank, John Deere Financial, FSB, and Huntington National Bank, with a combined market share of 77.8 percent. As stated above, farm lending is not a primary product in the Toledo MSA AA, with the bank only originating one small farm loan during the evaluation period.

Community Contacts/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information provided from one interview with a representative from an affordable housing organization. The contact identified the following as needs and opportunities in the AA:

- Capital to expand the minority contractor loan fund.
- Grants for the fair housing counselors.
- Capacity building grants for certified development corporations.

Springfield MSA AA

The Springfield MSA AA consists of Clark County, Ohio, in the Springfield, Ohio MSA 44220. The Springfield MSA includes Clark County only, with no other counties in the MSA. Springfield is the county seat of Clark County. The bank has one branch in Springfield, Ohio, in a moderate-income CT. There is no ATM or drive-thru facility at the Springfield branch.

Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA AA (2020 – 2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	9.1	31.8	36.4	22.7	0.0
Population by Geography	136,827	7.4	27.0	40.9	24.7	0.0
Housing Units by Geography	61,241	7.8	27.2	40.5	24.5	0.0
Owner-Occupied Units by Geography	36,310	3.1	20.2	46.6	30.1	0.0
Occupied Rental Units by Geography	18,499	14.3	37.6	31.6	16.4	0.0
Vacant Units by Geography	6,432	15.2	37.1	31.3	16.5	0.0
Businesses by Geography	6,140	4.8	27.6	37.8	29.8	0.0
Farms by Geography	367	2.7	17.7	45.8	33.8	0.0
Family Distribution by Income Level	35,980	20.9	17.4	20.9	40.8	0.0
Household Distribution by Income Level	54,809	23.9	16.3	17.9	41.9	0.0
Median Family Income MSA - 44220 Springfield, OH MSA		\$55,198	Median Housing Value			\$103,522
			Median Gross Rent			\$698
			Families Below Poverty Level			13.2%

Source: 2015 ACS and 2021 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.

Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA AA (2022)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	11.1	22.2	40.0	26.7	0.0
Population by Geography	136,001	7.6	20.7	41.4	30.2	0.0
Housing Units by Geography	61,283	8.7	20.8	42.6	27.9	0.0
Owner-Occupied Units by Geography	36,833	4.4	14.6	42.8	38.1	0.0
Occupied Rental Units by Geography	18,029	14.1	31.7	44.0	10.1	0.0
Vacant Units by Geography	6,421	17.6	25.8	37.5	19.1	0.0
Businesses by Geography	9,355	6.2	21.1	41.5	31.2	0.0
Farms by Geography	498	3.6	13.9	30.7	51.8	0.0
Family Distribution by Income Level	35,354	20.3	17.4	21.7	40.5	0.0
Household Distribution by Income Level	54,862	22.4	17.9	18.5	41.2	0.0
Median Family Income MSA - 44220 Springfield, OH MSA		\$63,361	Median Housing Value			\$114,435
			Median Gross Rent			\$747
			Families Below Poverty Level			11.1%

Source: 2020 U.S. Census and 2022 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.

Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the Springfield MSA AA is 136,827, with 7.4 percent of the population living in low-income CTs, 27 percent in moderate-income CTs, 40.9 percent in middle-income CTs, and 24.7 percent in upper-income CTs. The AA consists of 44 CTs, and is comprised of four low-income, 14 moderate-income, 16 middle-income, and 10 upper-income CTs. The AA includes 35,980 families and 54,809 households.

There were CT classification changes in the AA during the evaluation period between the 2015 ACS U.S. Census and the 2020 U.S. Census. As of the 2020 U.S. Census data in the table above, the population of the Springfield MSA AA is 136,001, with 7.6 percent of the population living in low-income CTs, 20.7 percent in moderate-income CTs, 41.4 percent in middle-income CTs,

and 30.2 percent in upper-income CTs. The AA consists of 45 CTs, and is comprised of five low-income, 10 moderate-income, 18 middle-income, and 12 upper-income CTs. The AA includes 35,354 families and 54,862 households.

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value is \$103,522. With the median family income of \$55,198, moderate-income families make less than \$44,158 annually and low-income families make less than \$27,599 annually. Median housing values are 2.3 times the annual income of moderate-income families and 3.8 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among some low-income families. The 2015 ACS U.S. Census data show that there are 61,241 total housing units in the Springfield MSA AA, of which 59.3 percent are owner-occupied, 30.2 percent are rental-occupied, and 10.5 percent are vacant units. As of the 2015 ACS U.S. Census, 1960 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 61 years. Additionally, the median age of housing stock in low-income CTs was 77 years and 74 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 13.2 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

According to the 2020 U.S. Census data, the median housing value is \$114,435. With the median family income of \$63,361, moderate-income families make less than \$50,689 annually and low-income families make less than \$31,681 annually. Median housing values are 2.3 times the annual income of moderate-income families and 3.6 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among low-income families. The 2020 U.S. Census data show that there are 61,283 total housing units in the Toledo MSA AA, of which 60.1 percent are owner-occupied, 29.4 percent are rental occupied, and 10.5 percent are vacant units. As of the 2020 U.S. Census, 1960 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 62 years. Additionally, the median age of housing stock in low-income CTs was 81 years and 73 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 11.1 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

Job Market and Economic Conditions

The economic conditions in the Springfield MSA AA have improved since the start of the COVID-19 pandemic. The unemployment rate in Clark County, as well as the state and national unemployment rates, experienced a spike in 2020 followed by a gradual recovery through the end of 2021. According to the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information as of December 2022, the “not seasonally adjusted” unemployment rate for Clark County of 3.7 is reasonable when compared to the state of Ohio (3.6 percent) and the national (3.3 percent) unemployment rates for the same period. Major industries include manufacturing, trade, service, and government. Large employers in the county include Mercy Health, Assurant Inc., and Navistar Inc.

Competition

Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks and branches of larger financial institutions. According to the June 30, 2022, Deposit Market Share Report from the FDIC, 12 financial institutions with 30 offices operated in Clark County, Ohio. CNB held the ninth largest deposit market share at 1.9 percent as of June 30, 2022, with \$37.2 million in total deposits. This represents 5 percent of the bank's total deposits. The bank's primary competitors included financial institutions with significant deposit activity in the AA such as Park National Bank, Huntington National Bank, and PNC Bank, N.A., with these three holding approximately 63 percent of the deposit market share.

Overall, CNB's primary business focus includes home mortgage, small business, and small farm lending. Management noted that there is no retail lender in the Springfield branch and that a majority of the loans are originated outside the AA. The bank only originated 14 home mortgage loans, 13 small business loans, and two small farm loans inside the Springfield MSA AA during the evaluation period. Therefore, the OCC could not perform a meaningful analysis of home mortgage, small business, or small farm lending with less than 20 loans originated per primary product during the evaluation period.

Based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data, top mortgage lenders in the AA included Wright-Patt Credit Union, Inc., Rocket Mortgage, and Caliber Home Loans, Inc., with a combined market share of almost 25 percent. During the evaluation period, 0.6 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Springfield MSA AA for 2020 and 2021.

Based on 2022 Peer Mortgage Data and 2020 U.S. Census data, top mortgage lenders in the AA included Wright-Patt Credit Union, Inc., Caliber Home Loans, Inc., and Rocket Mortgage, with a combined market share of almost 24 percent. During the evaluation period, 1.6 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Springfield MSA AA for 2022.

As of the 2021 Peer Small Business Data report, there were 59 lenders originating or purchasing small business loans in the Springfield MSA AA. The top three lenders included Park National Bank, American Express National Bank, and JPMorgan Chase Bank, N.A., with a combined market share of 38 percent. During the evaluation period, 1.8 percent of the bank's small business loan originations and purchases inside the AAs were in the Springfield MSA AA for 2020 and 2021 and 2.1 percent in 2022.

As of the 2021 Peer Small Farm Data report, there were 17 lenders originating or purchasing small farm loans in the Springfield MSA AA. The top lender was Park National Bank, with a market share of 62.6 percent. Farm lending is not a primary product in the Springfield MSA, as the bank only originated two small farm loans during the evaluation period.

Community Contacts/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information provided from one interview with a representative from an affordable housing organization. The contact stated that

general credit needs include affordable housing, small dollar mortgage products, and down payment assistance.

Scope of Evaluation in Ohio

The OCC performed a full-scope review of Lima MSA AA, Non-MSA AA, and the Toledo MSA AA, with a limited-scope review of the Springfield MSA AA. The data in the AAs were analyzed and presented as four AAs for the purposes of this evaluation. Home mortgage, small business, and small farm lending are the bank's primary lending products and were evaluated under the Lending Test. As discussed above, the OCC used HMDA and CRA loan data for 2020, 2021, and 2022 for the lending analysis. The OCC reviewed CD loans, qualified investments, and CD services for 2020, 2021, and 2022. Refer to the "Scope of the Evaluation" section for more details.

As stated above under the "Scope of the Evaluation" (Ratings) section, the Lima MSA AA and Non-MSA AA are weighted heavier than the other two AAs as the bank has a larger retail presence in these two AAs. Additionally, 58.3 percent of loan originations and purchases, based on number of loans originated or purchased, during the evaluation period were home mortgage loans. Given this, the OCC placed more weight on home mortgage lending. Refer to the above "Scope of the Evaluation" section for more details.

Conclusions With Respect to Performance Tests in Ohio

Lending Test

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

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank offers flexible home mortgage loan programs including loans insured by the Federal Housing Administration (FHA), U.S. Department of Veterans Affairs (VA), and the U.S. Department of Agriculture (USDA) Rural Housing program, all of which assist LMI borrowers with homeownership. These loans are included in the bank's HMDA data.

Distribution of Loans by Income Level of the Geography

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

In determining the rating, the OCC weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from other financial institutions, the number of LMI geographies, branch presence, and area demographics. The bank's Lima branch and independent drive-thru and Springfield branch are in moderate-income CTs. The Defiance branch was in moderate-income CT as of the 2015 ACS U.S. Census and the classification of this CT changed to middle-income as of the 2020 U.S. Census data. All other branches are in middle- or upper-income geographies.

Home Mortgage Loans

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

The bank's overall geographic distribution of home mortgage lending reflects reasonable distribution.

Lima MSA AA

CNB exhibits a reasonable geographic distribution of loans in the Lima MSA AA, given the performance context factors discussed below.

In the 2020 – 2021 analysis, the percentage of home mortgage loans originated or purchased by the bank was below both the demographic and aggregate lending data of other HMDA reporters in the LMI CTs. However, aggregate data was only 1.6 percent, and the percentage of owner-occupied housing units (demographic data) was only 2.7 percent in the low-income tracts.

In the 2022 analysis, the percentage of home mortgage loans originated or purchased in low-income tracts was near aggregate lending data but below demographic data. The bank's percentage of home mortgage loans originated or purchased in moderate-income tracts was below both demographic and aggregate data but overall reasonable.

In the lending analysis, the OCC considered other factors contributing to limited lending opportunities within the LMI CTs, including significant market competition in the AA. The top financial institution in home mortgage lending accounted for 28.6 percent of the home mortgage market share as of the 2021 Peer Mortgage Data Report, with CNB ranking second with 7 percent of the lending market share. As of the 2022 Peer Mortgage Data Report, the top two financial institutions in home mortgage lending accounted for almost 37 percent, with CNB ranking third with 5.4 percent of the market share. Many lenders are competing for the same LMI loans in this AA. The majority of the LMI CTs are in the downtown Lima area, with the bank serving these areas with one branch and drive-thru facility in a moderate-income CT in Lima, Ohio. The other offices in the Lima MSA AA are in upper-income geographies.

Based on 2021 figures, there is a relatively low volume of housing units within the low-income tracts (3,374). Approximately 29.2 percent of the total housing units are rental occupied, and 10.9 percent are vacant. A higher poverty rate (based on families below poverty) also contributes to lower lending in LMI CTs. The percentage of families below poverty in the low-income tracts was 53 percent and 25.8 percent in moderate-income tracts. The median age of housing stock within the AA is 59 years, with the median age of housing stock in low-income CTs at 77 years

and 69 years for moderate-income CTs. The maintenance costs associated with older housing stock can be a significant obstacle to homeownership for some LMI borrowers, which may result in a reduction of mortgage demand.

Based on 2022 figures, there is a relatively low volume of housing units within the low-income tracts (4,484). Approximately 30.3 percent of the housing units are rental occupied, and 9.1 percent are vacant. A higher poverty rate (based on families below poverty) also contributes to lower lending in LMI CTs. The percentage of families below poverty in the low-income tracts was 33.7 percent and 18.9 percent in moderate-income tracts. The median age of housing stock within the AA is 60 years, with the median age of housing stock in low-income CTs at 79 years and 65 years for moderate-income CTs. The maintenance costs associated with older housing stock can be a significant obstacle to homeownership for some LMI borrowers, which may result in a reduction of mortgage demand.

Non-MSA AA

The bank exhibits an overall reasonable geographic distribution of loans in the Non-MSA AA, given the performance context factors discussed below. There are no low-income tracts in the Non-MSA AA. There are three moderate-income tracts as of the 2015 ACS U.S. Census and five moderate-income tracts as of the 2020 U.S. Census.

In the 2020 – 2021 analysis, the percentage of home mortgage loans originated or purchased in moderate-income CTs was below both demographic and aggregate lending data of other HMDA reporters but overall reasonable. In the 2022 analysis, the percentage of home mortgage loans originated or purchased in moderate-income tracts significantly exceeded both demographic and aggregate lending data.

In the lending analysis, the OCC considered other factors contributing to limited lending opportunities within the moderate-income CTs, including significant market competition in the AA. The top three financial institutions in home mortgage lending accounted for 29.1 percent of the home mortgage market share as of the 2021 Peer Mortgage Data Report, with CNB ranking tenth with 3 percent of the lending market share. The market share results for 2021 were consistent with the 2022 Peer Mortgage Data Report. Many lenders are competing for the same LMI loans in this AA. As of the 2015 U.S. Census, CNB's Defiance Branch was in a moderate-income CT; however, as of the 2020 U.S. Census it is now in a middle-income CT. The other branches in the Non-MSA AA are in middle- and upper-income CTs.

Based on 2021 figures, 22.7 percent of the housing units are rental occupied, and 8 percent are vacant. The percentage of families below poverty in the moderate-income tracts was 24.5 percent, which contributes to lower lending in these tracts. The median age of housing stock within the AA is 54 years, with the median age of housing stock in moderate-income CTs at 67 years. The maintenance costs associated with older housing stock can be a significant obstacle to homeownership for some borrowers, which may result in a reduction of mortgage demand.

Toledo MSA AA

CNB exhibits an excellent geographic distribution of loans in the Toledo MSA AA.

In the 2020 – 2021 analysis, the percentage of home mortgage loans originated or purchased in low-income tracts exceeded both demographic and aggregate lending data. The bank's percentage of lending in moderate-income tracts exceeded aggregate data and was near demographic data.

The OCC did not perform an analysis of the geographic distribution of loans in the Toledo MSA AA for loans originated or purchased in 2022. The bank originated 18 home mortgage loans in 2022 which is not sufficient for a meaningful analysis.

Small Loans to Businesses

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

The OCC compared the percentage of the number of small loans to businesses originated or purchased by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of businesses throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to businesses of other lenders (aggregate data), as demonstrated by CRA aggregate data.

In determining conclusions, the OCC gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of businesses located in LMI tracts within the AAs.

The bank's overall geographic distribution of small loans to businesses is reasonable.

Lima MSA AA

CNB exhibits a reasonable geographic distribution of loans in the Lima MSA AA, given the performance context factors discussed below. In the 2020 – 2021 analysis, the percentage of small loans to businesses originated or purchased in low-income CTs was below both aggregate and demographic data. However, the percentage of small loans to businesses originated or purchased in moderate-income CTs exceeded aggregate data and was near demographic data. In the 2022 analysis, the percentage of small loans to businesses originated or purchased in LMI CTs was below demographic data. Aggregate CRA data was not available for 2022.

Competition for business loans remains strong in the AA. As of the 2021 Peer Small Business Data Report, there were 52 lenders originating or purchasing small business loans in the Lima MSA AA. The top three lenders accounted for a combined market share of 42.2 percent. Based on the number of loans originated or purchased, CNB ranked eighth out of 52 lenders in the Lima MSA AA in small business lending, with 4.2 percent of the lending market share. Based on the dollar volume of loans originated or purchased, CNB ranked first out of 52 lenders in the Lima MSA AA in small business lending, with 26.6 percent of the lending market share.

Non-MSA AA

The bank exhibits a reasonable geographic distribution of loans in the Non-MSA AA. There are no low-income CTs in the Non-MSA AA. In the 2020 – 2021 analysis, the percentage of small loans to businesses originated or purchased in moderate-income CTs was near aggregate data and below demographic data. In the 2022 analysis, the percentage of small loans to businesses originated or purchased in moderate-income CTs slightly exceeded demographic data. Aggregate CRA data was not available for 2022.

There is strong competition for small business loans in the AA. As of the 2021 Peer Small Business Data Report, there were 74 lenders originating or purchasing small business loans in the Non-MSA AA. The top three lenders accounted for a combined market share of 35.5 percent. Based on the number of loans originated or purchased, CNB ranked 11th out of 74 lenders in the Non-MSA AA in small business lending, with 3.1 percent of the lending market share. Based on the dollar volume of loans originated or purchased, CNB ranked second in small business lending, with 14.1 percent of the lending market share.

Toledo MSA AA

The bank exhibits an excellent geographic distribution of loans in the Toledo MSA AA. In the 2020 – 2021 analysis, the percentage of small loans to businesses originated or purchased in low-income CTs exceeded both aggregate and demographic data. The percentage of small loans to businesses originated or purchased in moderate-income CTs exceeded both aggregate and demographic data. In 2022, the bank originated only eight small loans to businesses, which is not sufficient for a meaningful analysis.

Small Loans to Farms

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

The OCC compared the percentage of the number of small loans to farms originated or purchased by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of farms throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to farms of other lenders (aggregate data), as demonstrated by CRA aggregate data.

In determining conclusions, the OCC gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of farms located in LMI tracts within the AAs.

The bank's overall geographic distribution of small loans to farms is reasonable.

Lima MSA AA

CNB exhibits an overall reasonable geographic distribution of loans in the Lima MSA AA, given the aggregate data and other performance context factors. The bank did not originate or purchase any small loans to farms in the LMI tracts in 2020 and 2021. However, aggregate data shows that no farm loans were made in LMI CTs. In 2022, the bank originated or purchased one loan in a

moderate-income CT, with the percentage below demographic data. Aggregate CRA data was not available for 2022.

Competition for farm loans remains strong in the AA. As of the 2021 Peer Small Farm Data Report, there were 12 lenders originating or purchasing small farm loans in the Lima MSA AA. The top lender was CNB with 38.2 percent of the small farm loan market share. The second highest lender accounted for 24.4 percent of the market share. CNB is a top farm lender in the AA. A majority of the LMI tracts are located near downtown Lima. Farming is not as prevalent near city/town limits.

Non-MSA AA

CNB exhibits a reasonable geographic distribution of loans in the Non-MSA AA. There are no low-income geographies in this AA. Approximately 66.1 percent of all of CNB's farm loan originations or purchases in 2020 – 2021 were in the Non-MSA AA. In the 2020 – 2021 analysis, the bank's distribution of small loans to farms in the moderate-income CTs was below demographic and aggregate data; however, aggregate data only shows 0.1 percent of loans made in moderate-income CTs and only 1.2 percent of the farms are in moderate-income tracts (demographic data). In the 2022 analysis, the bank's distribution of small loans to farms originated or purchased in moderate-income CTs was below demographic data. Aggregate CRA data was not available for 2022.

Competition for farm loans remains strong in the AA. As of the 2021 Peer Small Farm Data Report, there were 27 lenders originating or purchasing small farm loans in the Non-MSA AA. The top lender was CNB with 14.6 percent of the small farm loan market share. The next three highest lenders in market share accounted for 34.2 percent of the market share. CNB is a top farm lender in the Non-MSA AA. The moderate-income tracts in the Non-MSA AA are located near town/city limits where farming is not as prevalent.

Toledo MSA AA

The bank originated one farm loan during the evaluation period in the Toledo MSA AA; therefore, a meaningful analysis could not be completed. The bank's Toledo office opened in 2018, with home mortgage and small loans to businesses as the primary loan products in this AA. Farm lending is not a primary product in the Toledo MSA AA.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

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

CNB exhibits an overall reasonable distribution of home mortgage loans among borrowers of different income levels.

Lima MSA AA

The bank exhibits a reasonable distribution of home mortgage loans among borrowers of different income levels within the Lima MSA AA, given the performance context factors discussed below.

In the 2020 – 2021 analysis, CNB's percentage of home mortgage loans to low-income borrowers was below both demographic and aggregate data. CNB's percentage of home mortgage loans to moderate-income borrowers exceeded demographic data and was below aggregate data, demonstrating overall reasonable performance.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for low-income borrowers. As stated above, overall median housing values are 3.5 times the weighted average of the median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to some low-income families. Approximately 12.7 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan. There is strong competition for home mortgage loans in the Lima MSA AA. The top financial institution in home mortgage lending accounted for 28.6 percent of the home mortgage market share as of the 2021 Peer Mortgage Data Report, with CNB ranking second with 7 percent of the lending market share.

In the 2022 analysis, CNB's percentage of home mortgage loans to low-income borrowers was near aggregate data and below demographic data. CNB's percentage of home mortgage loans to moderate-income borrowers exceeded demographic data and was below aggregate data, demonstrating overall reasonable performance.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for low-income borrowers. As stated above, overall median housing values are 3.5 times the weighted average of the median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to some low-income families. Approximately 9.5 percent of the families live below the poverty level, making it especially difficult for this

segment of the population to afford and maintain a home or qualify for a loan. As of the 2022 Peer Mortgage Data Report, the top two financial institutions in home mortgage lending accounted for almost 37 percent of the market share, with CNB ranking third with 5.4 percent.

Non-MSA AA

The bank exhibits a reasonable distribution of home mortgage loans among borrowers of different income levels within the Non-MSA AA, given the performance context factors discussed below.

In the 2020 – 2021 analysis, CNB’s percentage of home mortgage loans to low-income borrowers was below both demographic and aggregate data. CNB’s percentage of home mortgage loans to moderate-income borrowers was near demographic data and below aggregate data, demonstrating overall reasonable performance.

The OCC considered other factors in the bank’s performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for low-income borrowers. As stated above, overall median housing values are 4.3 times the weighted average of the median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to low-income families. Approximately 7.8 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan. There is strong competition for home mortgage loans in the Non-MSA AA. The top three financial institutions in home mortgage lending accounted for 29.1 percent of the home mortgage market share as of the 2021 Peer Mortgage Data Report, with CNB ranking 10th with 3 percent of the lending market share.

In the 2022 analysis, CNB’s percentage of home mortgage loans to low-income borrowers exceeded aggregate data and was near demographic data. CNB’s percentage of home mortgage loans to moderate-income borrowers was near demographic data and below aggregate data.

The OCC considered other factors in the bank’s performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for low-income borrowers. As stated above, overall median housing values are 4.2 times the weighted average of the median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to low-income families. Approximately 6.2 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan. As of the 2022 Peer Mortgage Data Report, the top three financial institutions in home mortgage lending accounted for 29.3 percent, with CNB ranking 10th with 2.4 percent of the market share.

Toledo MSA AA

The bank exhibits a poor distribution of home mortgage loans among borrowers of different income levels within the Toledo MSA AA. However, approximately 52.5 percent of the home mortgage loans were non-owner-occupied investment properties, with no income reported in the HMDA data. Management stated that there is no onsite residential lender in the Toledo office, and the majority of the loans are business or investment property related.

In the 2020 – 2021 analysis, CNB's did not originate any home mortgage loans to low-income borrowers, which is poor when compared to demographic and aggregate data. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below both demographic and aggregate data. Without the investment property loans, the bank's percentage to moderate-income borrowers was still below demographic and aggregate data.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for low-income borrowers. As stated above, overall median housing values are 3.4 times the weighted average of the median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to low-income families. The percentage of families that live below the poverty level is high at 16.5 percent, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan. There is strong competition for home mortgage loans in the Toledo MSA AA. The top three financial institution in home mortgage lending accounted for 28.7 percent of the home mortgage market share as of the 2021 Peer Mortgage Data Report, with CNB ranking 54th out of 345 lenders with 0.25 percent of the lending market share.

In 2022, CNB originated or purchased only 18 home mortgage loans in the Toledo MSA AA, which is not sufficient for a meaningful analysis.

Small Loans to Businesses

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

The OCC compared the percentage distribution of the number of small loans to businesses originated or purchased by the bank by gross annual revenue level to businesses with gross annual revenues of \$1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small business data (aggregate data), as demonstrated by CRA aggregate data.

The OCC placed more weight on the Lima MSA AA and Non-MSA AA, as less than 10 percent of the small business loan originations and purchases were inside the other two AAs. During the evaluation period, 27.7 percent of the small business loan originations and purchases inside the AAs were in the Lima MSA AA for 2020 and 2021 and 27.5 percent in 2022. Approximately 64.2 percent of the total small business loan originations and purchases were inside the Non-MSA AA for 2020 and 2021 and 67.1 percent in 2022.

In evaluating the borrower distribution of small loans to businesses of different sizes, the OCC considered the level of competition and its effect on limiting the bank's ability to lend, as well as the economic conditions in the AAs.

CNB exhibits an overall reasonable distribution of small loans to businesses of different sizes.

Lima MSA AA

CNB exhibits a reasonable distribution of small loans to businesses of different sizes within the Lima MSA AA. The data in Table R does not include any SBA PPP loans.

In the 2020 – 2021 analysis, the bank’s percentage of small loans to businesses with gross annual revenues of \$1 million or less was near aggregate data, but below demographic data. In the 2022 analysis, the bank’s percentage of small loans to businesses with gross annual revenues of \$1 million or less was below demographic data. Aggregate data was not available for 2022.

As of the 2021 Peer Small Business Data Report, the top three lenders accounted for a market share of 42.2 percent. As stated above, based on the number of loans originated or purchased, CNB ranked eighth out of 52 lenders in the Lima MSA AA in small business lending. Based on the dollar amount of loans originated or purchased, CNB ranked first out of 52 lenders in the Lima MSA AA in small business lending, with 26.6 percent of the lending market share (55 loans totaling \$17.6 million). CNB is a top small business lender in the AA.

The COVID-19 pandemic impacted the local economy in 2020 and 2021. The bank was particularly responsive to the credit needs of local businesses with the origination of SBA PPP loans in both years. However, these loans were not included in the CRA loan data (small business loans) as the bank requested them to be reviewed under CD Lending.

Non-MSA AA

CNB exhibits a reasonable distribution of small loans to businesses of different sizes within the Non-MSA AA. The data in Table R does not include any SBA PPP loans.

In the 2020 – 2021 analysis, the bank’s percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeded aggregate data but was below demographic data. In the 2022 analysis, the bank’s percentage of small loans to businesses with gross annual revenues of \$1 million or less was below demographic data. However, aggregate data was not available for 2022.

As of the 2021 Peer Small Business Data Report, there were 74 lenders originating small business loans in Defiance, Hancock, Mercer, Paulding, Putnam, Van Wert, and Auglaize Counties in Ohio. The top three lenders accounted for a market share of 35.5 percent. Based on the number of loans originated or purchased, CNB ranked 11th out of 74 lenders in the Non-MSA AA in small business lending. However, based on the dollar amount of loans originated, CNB ranked second out of 74 lenders in the Non-MSA AA in small business lending, with 14.1 percent of the lending market share (\$29 million).

The COVID-19 pandemic impacted the local economy in 2020 and 2021. The bank was particularly responsive to the credit needs of local businesses with the origination of SBA PPP loans in both years. However, these loans were not included in the CRA loan data (small business loans) as the bank requested them to be reviewed under CD Lending.

Toledo MSA AA

CNB exhibits a reasonable distribution of small loans to businesses of different sizes within the Toledo MSA AA. The data in Table R does not include any SBA PPP loans.

In the 2020 – 2021 analysis, CNB’s percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeded aggregate data but was below demographic data. In 2022, the bank originated only eight small loans to businesses, which is not sufficient for a meaningful analysis.

As of the 2021 Peer Small Business Data Report, there were 99 lenders originating or purchasing small business loans in the Toledo MSA AA. The top three lenders accounted for a market share of 34.3 percent. Based on the number of loans originated, CNB ranked 35th out of 99 lenders in the Toledo MSA AA in small business lending, with 0.16 percent of the lending market share (12 loans). During the evaluation period, 6.2 percent of the small business loan originations and purchases inside the AAs were in the Toledo MSA AA for 2020 and 2021 and 3.3 percent in 2022. With only a small percentage of loans originated or purchased in the Toledo MSA AA, the OCC placed less weight on this AA.

Small Loans to Farms

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

The OCC compared the percentage distribution of the number of small loans to farms originated or purchased by the bank by gross annual revenue level to farms with gross annual revenues of \$1 million or less (demographic data). The OCC also compared the bank’s performance to aggregate small farm data (aggregate data), as demonstrated by CRA aggregate data.

As evidenced in Table T, the OCC placed more weight on the Lima MSA AA and Non-MSA AA, as less than 1 percent of the small farm loan originations and purchases were inside the other two AAs.

In evaluating the borrower distribution of small loans to farms of different sizes, the OCC considered the level of competition and its effect on limiting the bank’s ability to lend, as well as the economic conditions in the AA.

CNB exhibits an overall excellent distribution of small loans to farms of different sizes.

Lima MSA AA

CNB exhibits an excellent distribution of small loans to farms of different sizes within the Lima MSA AA.

In the 2020 – 2021 analysis, the bank’s percentage of small loans to farms with gross annual revenues of \$1 million or less significantly exceeded aggregate data but was below demographic data. In the 2022 analysis, the bank’s percentage of small loans to farms with gross annual revenues of \$1 million or less was near demographic data. However, aggregate data was not available for 2022.

As of the 2021 Peer Small Farm Data Report, there were 12 lenders originating or purchasing small farm loans in the Lima MSA AA. Based on the number of loans originated or purchased,

CNB ranked first out of 12 lenders in the Lima MSA AA in small farm lending, with 38.2 percent of the lending market share. The bank originated 50 loans totaling \$6.6 million in 2021. The top three lenders, behind CNB, accounted for a combined market share of 38 percent. CNB was the top farm lender in the Lima MSA AA in 2021.

Non-MSA AA

CNB exhibits an excellent distribution of small loans to farms of different sizes within the Non-MSA AA.

In the 2020 – 2021 analysis, the bank’s percentage of small loans to farms with gross annual revenues of \$1 million or less significantly exceeded aggregate data but was below demographic data. In the 2022 analysis, the bank’s percentage of small loans to farms with gross annual revenues of \$1 million or less was near demographic data. However, aggregate data was not available for 2022.

As of the 2021 Peer Small Farm Data Report, there were 27 lenders originating or purchasing small farm loans in the Non-MSA AA. Based on the number of loans originated or purchased, CNB ranked first out of 27 lenders, with 14.6 percent of the small farm lending market share. The next three lenders accounted for a combined market share of 34.2 percent. CNB was the top farm lender in the Non-MSA AA in 2021.

Toledo MSA AA

The bank originated one farm loan during the evaluation period in the Toledo MSA AA, which is insufficient for a meaningful analysis. The bank’s Toledo office opened in 2018, with home mortgage and small loans to businesses as the primary loan products in this AA. Farm lending is not a primary product in the Toledo MSA AA.

Responses to Complaints

CNB has not received any complaints about its performance in helping to meet the AAs’ credit needs during the evaluation period.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank’s performance under the Lending Test in the Springfield MSA AA is consistent with the bank’s overall performance under the Lending Test in the full-scope areas. The OCC considered CNB’s relatively small presence in this AA in our conclusions.

CNB originated nine home mortgage loans in the Springfield MSA AA in 2020 – 2021 and five in 2022. The bank originated eight small business loans in the Springfield MSA AA in 2020 – 2021 and five in 2022. CNB originated one small farm loan in the Springfield MSA AA in 2020 – 2021 and one in 2022. Given the small number of loan originations or purchases, the OCC could not complete a meaningful comparative analysis.

Community Development Test

The bank's performance under the Community Development Test in the state of Ohio is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

CNB was particularly responsive to the COVID-19 pandemic and its level of CD loans were highly impactful. The OCC placed more weight on CD lending, given the bank's excellent responsiveness to the COVID-19 crisis and volume of CD loans made in response to the COVID-19 pandemic.

CNB's participation in the SBA's PPP was particularly responsive to the credit needs of the businesses and enhanced the credit availability of this loan product. The PPP loans originated in 2021 met the definition of CD as part of the 2020 OCC CRA Rule and the expanded CD definitions. However, loans made prior to October 1, 2020, were analyzed under the 1995 CRA Rule and only counted as CD loans if they had a primary purpose of CD as defined in that rule.

Number and Amount of Community Development Loans

The CD Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

The number and dollar amount of qualified CD loans represent excellent responsiveness. During the evaluation period, CNB originated 812 qualified CD loans inside their AAs totaling \$38.7 million. Additionally, the bank originated 140 CD loans in the statewide/regional area of Ohio, totaling \$7.1 million.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Lima MSA AA	203	21.3	13,707	29.9
Non-MSA AA	570	59.9	19,567	42.8
Toledo MSA AA	32	3.4	4,846	10.6
Springfield MSA AA	7	0.7	532	1.2
Statewide/Regional Loans with Indirect Benefit	140	14.7	7,112	15.5
Total	952	100.0	45,764	100.0

Lima MSA AA

During the evaluation period, CNB originated 203 CD loans totaling \$13.7 million. This demonstrates excellent responsiveness. In 2021, CNB originated 202 SBA PPP loans totaling \$13.5 million to help businesses keep their workforces employed during the COVID-19 pandemic. The PPP loans particularly helped revitalize and stabilize LMI areas and promoted economic development in these areas. The PPP loans were innovative, flexible loan products, given the current COVID-19 crisis. The bank was particularly responsive to the community's needs in the Lima MSA AA with the origination of PPP loans.

Additionally, CNB originated one CD loan totaling \$200,000 in the Lima MSA AA in 2020. This loan was originated to a non-profit organization that provides community services in Allen County, Ohio.

Non-MSA AA

During the evaluation period, CNB originated 570 CD loans totaling \$19.6 million. This demonstrates excellent responsiveness. In 2021, CNB originated 569 SBA PPP loans totaling \$19.6 million to help businesses keep their workforces employed during the COVID-19 pandemic. The PPP loans particularly helped revitalize and stabilize LMI areas and promoted economic development in these areas. The PPP loans were innovative, flexible loan products, given the current COVID-19 crisis. The bank was particularly responsive to the community's needs in the Non-MSA AA with the origination of PPP loans.

Additionally, CNB originated one CD loan totaling \$15,000 in the Non-MSA AA in 2020. This loan was originated to a non-profit organization that provides affordable housing in Van Wert County, Ohio. The affordable housing loan was made for the purchase of a home for LMI individuals.

Toledo MSA AA

During the evaluation period, CNB originated 32 CD loans totaling \$4.8 million. This demonstrates excellent responsiveness. In 2021, CNB originated 32 SBA PPP loans totaling \$4.8 million to help businesses keep their workforces employed during the COVID-19 pandemic. The

PPP loans particularly helped revitalize and stabilize LMI areas and promoted economic development in these areas. The PPP loans were innovative, flexible loan products, given the current COVID-19 crisis. The bank was particularly responsive to the community's needs in the Toledo MSA AA with the origination of PPP loans.

Statewide/Regional Area of Ohio

CNB is responsive to the CD needs in its AAs so additional consideration was given to 140 CD loans in the statewide area of Ohio. During the evaluation period, CNB originated 140 SBA PPP loans totaling \$7.1 million. These loans helped businesses keep their workforces employed during the COVID-19 pandemic. The PPP loans particularly helped revitalize and stabilize LMI areas and promoted economic development in these areas. The PPP loans were innovative, flexible loan products, given the current COVID-19 crisis.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Lima MSA AA	0	0	46	54	46	28.2%	54	49.1%	0	0
Non-MSA AA	0	0	104	49	104	63.8%	49	44.5%	0	0
Toledo MSA AA	0	0	13	7	13	8.0%	7	6.4%	0	0
Springfield MSA AA	0	0	0	0	0	0	0	0	0	0
Total	0	0	163	110	163	100	110	100	0	0

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

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

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the evaluation date.

CNB's qualified CD investment activity represents adequate responsiveness. During the evaluation period, CNB made 163 qualified investments/donations totaling \$109,722.

Lima MSA AA

The number and amount of qualified CD investments in the Lima MSA AA represent adequate responsiveness. Qualified investments consist of donations and sponsorships for various non-profit organizations. Organizations include emergency shelters, food banks, homeless centers, economically depressed youth scholarship funds, and healthcare programs for low-income

individuals. See the above table for the number and dollar volume of investments/donations in the Lima MSA AA.

Non-MSA AA

The number and amount of qualified CD investments in the Non-MSA AA represent adequate responsiveness. Qualified investments consist of donations and sponsorships for various non-profit organizations. Organizations include homeless centers, food banks, disadvantaged youth centers, programs for victims of domestic violence, and affordable housing programs for low-income individuals. See the above table for the number and dollar volume of investments/donations in the Non-MSA AA.

Toledo MSA AA

The number and amount of qualified CD investments in the Toledo MSA AA represent adequate responsiveness. Qualified investments consist of donations and sponsorships for various non-profit organizations. Organizations include underprivileged youth programs, food pantries, health care programs for low-income individuals, and economic development organizations for depressed areas. See the above table for the number and dollar volume of investments/donations in the Toledo MSA AA.

Extent to Which the Bank Provides Community Development Services

CNB exhibits adequate responsiveness to CD needs through CD services.

CNB's delivery systems are accessible to geographies and individuals of different income levels throughout the AAs. Impactful CD services were noted in the form of maintaining banking offices in moderate-income CTs. As of the 2015 ACS U.S. Census, the bank had three branches and one independent drive-thru in moderate income CTs. As of the 2020 U.S. Census, the bank has two branches and one independent drive-thru in moderate income CTs. The maintenance of these offices serves to increase access to financial services to the AAs, including LMI residents. CNB also compliments its traditional service delivery methods with certain alternative delivery channels, including online banking, mobile banking, and ATMs.

CNB also assisted customers in taking advantage of down payment and closing cost assistance programs targeted to LMI individuals in its AAs. The Federal Home Loan Bank (FHLB) offers a Welcome Home program that provides down payment assistance to LMI borrowers that meet specific income criteria. CNB originated 34 loans with FHLB Welcome Home grants during the evaluation period.

Lima MSA AA

The provision of CD services in the Lima MSA AA represents adequate responsiveness. Approximately four officers/employees served as directors, board committee members, and volunteers for 15 qualifying CD organizations. Of the services performed, many were in leadership roles. Multiple employees serve on committees that meet various times throughout the year and have served in their capacity for many years. One employee serves on the board of several local economic development organizations and serves on an advisory board for one

organization's revolving loan fund that is an integral part of that organization's activities. The fund is used for loans to businesses that often would not qualify for traditional financing due to the business being a start-up or due to a lack of collateral. Another employee serves on two economic development committees for downtown Lima, which contains multiple LMI CTs.

Non-MSA AA

The provision of CD services in the Non-MSA AA represents adequate responsiveness. At least eight officers/employees served as directors, board committee members, and volunteers for 13 qualifying CD organizations. Of the services performed, many were in leadership roles. One bank employee serves as the Vice President of the board for a business development organization. Another serves on the board of the local Salvation Army which benefits low-income individuals in the area. One employee serves on a committee for a revolving loan fund that provides economic development in the AA. Employees serve at multiple well-known organizations to provide financial knowledge in helping LMI areas and individuals.

Toledo MSA AA

Employees/officers did not assist with any CD service organizations located in the Toledo MSA AA during the evaluation period. However, the Toledo MSA is a newer AA for the bank, with the full-service branch opening in 2018. Management is working to develop relationships with community organizations in the area. Additionally, opportunities were limited due to the pandemic in 2020 and 2021 impacting many CD service organizations.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Springfield MSA AA is consistent with the bank's overall performance under the CD Test in the full-scope areas. The OCC considered CNB's relatively small presence in this AA in our conclusions.

During the evaluation period, CNB originated seven SBA PPP loans totaling \$532,000 to help businesses keep their workforces employed during the COVID-19 pandemic. The PPP loans particularly helped revitalize and stabilize LMI areas and promoted economic development in these areas. The PPP loans were innovative, flexible loan products, given the current COVID-19 crisis. The bank was particularly responsive to the community's needs in the Springfield MSA AA with the origination of PPP loans.

During the evaluation period, CNB did not make any qualified investments/donations in the Springfield MSA AA. Additionally, CNB employees did not assist with any CD service organizations located in the Springfield MSA AA during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas 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:	1/1/20 – 12/31/22	
Bank Products Reviewed:	Home mortgage, small business, and small farm loans CD loans, qualified investments, and CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State - Ohio		
Lima MSA AA	Full-Scope	Allen County, Ohio, in the Lima, OH MSA 30620.
Non-MSA AA	Full-Scope	Defiance, Hancock, Mercer, Paulding, Putnam, and Van Wert counties in Ohio and CTs 401 and 402 in Auglaize County, Ohio.
Toledo MSA AA	Full-Scope	Lucas County, Ohio, in the Toledo, OH MSA 45780.
Springfield MSA AA	Limited-Scope	Clark County, Ohio, in the Springfield, OH MSA 44220.

Appendix B: Summary of State Ratings

Ratings: The Citizens National Bank of Bluffton			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
The Citizens National Bank of Bluffton	Satisfactory	Outstanding	Satisfactory
State:			
Ohio	Satisfactory	Outstanding	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 (MD): 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 (MSA): 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.

State of Ohio

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography													2020-21						
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Lima MSA AA	675	110,402	46.2	3,793	2.7	0.4	1.6	12.8	4.4	9.5	52.7	47.7	49.5	31.9	47.4	39.3	0.0	0.0	0.0
Springfield MSA AA	9	3,585	0.6	5,848	3.1	11.1	1.0	20.2	22.2	18.4	46.6	22.2	47.1	30.1	44.4	33.6	0.0	0.0	0.0
Toledo MSA AA	80	13,535	5.5	16,557	9.5	11.3	2.7	16.4	15.0	10.3	39.5	42.5	41.2	34.6	31.3	45.8	0.0	0.0	0.0
Non-MSA AA	696	111,559	47.7	8,587	0.0	0.0	0.0	3.8	2.2	4.9	49.7	55.2	48.1	46.4	42.7	47.0	0.0	0.0	0.0
Total	1,460	239,081	100.0	34,785	5.0	0.9	1.6	12.8	4.0	10.2	45.1	50.8	44.8	37.2	44.2	43.3	0.0	0.0	0.0

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography													2022						
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Lima MSA AA	154	23,801	48.9	2,843	5.1	2.6	2.9	18.7	16.2	20.4	50.3	41.6	46.4	25.9	39.6	30.3	0.0	0.0	0.0
Springfield MSA AA	5	770	1.6	3,945	4.4	0.0	2.2	14.6	60.0	17.6	42.8	40.0	44.9	38.1	0.0	35.3	0.0	0.0	0.0
Toledo MSA AA	18	4,485	5.7	11,183	6.9	22.2	3.3	20.4	22.2	18.0	33.2	38.9	34.9	36.7	11.1	42.3	2.9	5.6	1.6
Non-MSA AA	138	23,417	43.8	5,834	0.0	0.0	0.0	3.8	8.7	4.7	62.2	62.3	61.2	34.1	29.0	34.1	0.0	0.0	0.0
Total	315	52,473	100.0	23,805	4.2	2.5	2.3	14.3	14.0	15.0	45.3	50.5	44.3	34.9	32.7	37.7	1.3	0.3	0.8

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower															2020-21				
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Lima MSA AA	675	110,402	46.2	3,793	21.7	4.7	7.5	17.0	18.2	20.8	21.6	24.4	22.9	39.7	46.5	33.5	0.0	6.1	15.2
Springfield MSA AA	9	3,585	0.6	5,848	20.9	0.0	6.7	17.4	11.1	18.9	20.9	0.0	21.6	40.8	44.4	32.8	0.0	44.4	20.0
Toledo MSA AA	80	13,535	5.5	16,557	26.1	0.0	8.1	17.1	5.0	20.5	18.7	7.5	22.4	38.1	35.0	36.3	0.0	52.5	12.6
Non-MSA AA	696	111,559	47.7	8,587	14.2	3.0	6.5	16.4	15.8	19.4	22.4	24.3	23.2	47.0	49.3	37.1	0.0	7.6	13.8
Total	1,460	239,081	100.0	34,785	21.5	3.6	7.4	16.9	16.3	20.0	20.4	23.3	22.5	41.2	47.2	35.6	0.0	9.6	14.4

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower															2022				
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Lima MSA AA	154	23,801	48.9	2,843	19.2	11.0	11.3	19.0	22.1	25.8	22.4	26.0	22.9	39.5	35.7	28.6	0.0	5.2	11.5
Springfield MSA AA	5	770	1.6	3,945	20.3	0.0	7.1	17.4	0.0	21.9	21.7	0.0	24.4	40.5	20.0	30.7	0.0	80.0	15.9
Toledo MSA AA	18	4,485	5.7	11,183	25.9	0.0	11.3	16.8	0.0	22.9	19.4	0.0	22.6	38.0	16.7	31.9	0.0	83.3	11.3
Non-MSA AA	138	23,417	43.8	5,834	13.8	11.6	8.9	16.5	14.5	23.8	22.9	19.6	24.3	46.8	37.0	31.8	0.0	17.4	11.1
Total	315	52,473	100.0	23,805	20.9	10.5	10.0	17.0	17.1	23.3	21.1	21.3	23.3	41.0	34.9	31.3	0.0	16.2	12.0

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2020-21						
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Lima MSA AA	120	34,906	27.7	1,321	4.7	1.7	4.1	19.4	16.7	16.1	44.0	43.3	44.7	31.9	38.3	35.0	0.0	0.0	0.0
Springfield MSA AA	8	1,126	1.9	1,680	4.8	0.0	4.0	27.6	37.5	25.4	37.8	25.0	37.5	29.8	37.5	33.1	0.0	0.0	0.0
Toledo MSA AA	27	5,477	6.2	7,400	16.4	18.5	14.5	12.2	18.5	12.5	35.6	29.6	34.3	35.8	33.3	38.8	0.0	0.0	0.0
Non-MSA AA	278	64,439	64.2	3,800	0.0	0.0	0.0	7.3	6.1	6.4	49.0	61.2	47.1	43.6	32.7	46.5	0.0	0.0	0.0
Total	433	105,948	100.0	14,201	9.5	1.6	8.4	13.5	10.4	12.7	40.3	53.6	39.0	36.7	34.4	39.8	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
 This table does not include any SBA PPP loans.
 Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography												2022	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$ (000s)	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Lima MSA AA	66	17,356	27.5	7.5	4.5	26.2	22.7	41.4	33.3	24.9	39.4	0.0	0.0
Springfield MSA AA	5	994	2.1	6.2	0.0	21.1	40.0	41.5	40.0	31.2	20.0	0.0	0.0
Toledo MSA AA	8	2,273	3.3	10.1	0.0	20.3	12.5	26.8	37.5	30.5	37.5	12.3	12.5
Non-MSA AA	161	37,296	67.1	0.0	0.0	8.5	8.7	56.3	69.6	35.2	21.7	0.0	0.0
Total	240	57,919	100.0	7.0	1.3	18.2	13.3	36.9	57.9	31.1	27.1	6.8	0.4

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data was not available.
 Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Lima MSA AA	120	34,906	27.7	1,321	76.4	42.5	46.5	6.8	57.5	16.9	0.0
Springfield MSA AA	8	1,126	1.9	1,680	79.3	50.0	51.8	6.1	50.0	14.6	0.0
Toledo MSA AA	27	5,477	6.2	7,400	81.4	66.7	47.6	6.5	33.3	12.1	0.0
Non MSA AA	278	64,439	64.2	3,800	77.8	55.8	45.7	6.9	44.2	15.2	0.0
Total	433	105,948	100.0	14,201	79.7	52.7	47.5	6.6	47.3	13.7	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
 This table does not include any SBA PPP loans.
 Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Lima MSA AA	66	17,356	27.5	--	83.8	37.9	--	4.6	62.1	11.6	0.0
Springfield MSA AA	5	994	2.1	--	86.3	80.0	--	3.9	20.0	9.7	0.0
Toledo MSA AA	8	2,273	3.3	--	89.6	62.5	--	3.5	37.5	6.9	0.0
Non-MSA AA	161	37,296	67.1	--	85.5	58.4	--	4.4	41.6	10.1	0.0
Total	240	57,919	100.0	--	87.7	53.3	--	3.8	46.7	8.4	0.0

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available; 2022 CRA Aggregate Data was not available.
 Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography														2020-21				
Assessment Area:	Total Loans to Farms			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Lima MSA AA	119	15,528	33.3	0.6	0.0	0.0	5.4	0.0	0.0	74.4	89.9	84.0	19.6	10.1	16.0	0.0	0.0	0.0
Springfield MSA AA	1	34	0.3	2.7	0.0	0.0	17.7	0.0	0.6	45.8	100.0	61.1	33.8	0.0	38.3	0.0	0.0	0.0
Toledo MSA AA	1	110	0.3	7.6	0.0	1.9	12.1	0.0	1.9	34.7	0.0	20.4	45.6	100.0	75.9	0.0	0.0	0.0
Non-MSA AA	236	31,350	66.1	0.0	0.0	0.0	1.2	0.0	0.1	41.4	50.8	41.8	57.5	49.2	58.1	0.0	0.0	0.0
Total	357	47,022	100.0	1.9	0.0	0.1	5.7	0.0	0.3	43.8	63.9	49.2	48.6	36.1	50.4	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
 Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography												2022	
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$ (000s)	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Lima MSA AA	45	6,242	29.6	2.2	0.0	6.8	2.2	74.9	86.7	16.0	11.1	0.0	0.0
Springfield MSA AA	1	124	0.7	3.6	0.0	13.9	0.0	30.7	100.0	51.8	0.0	0.0	0.0
Toledo MSA AA	0	0	0.0	7.2	0.0	18.5	0.0	27.2	0.0	39.2	0.0	7.9	0.0
Non-MSA AA	106	16,557	69.7	0.0	0.0	2.5	0.9	52.7	68.9	44.8	30.2	0.0	0.0
Total	152	22,923	100.0	2.4	0.0	8.1	1.3	46.3	74.3	41.3	24.3	1.9	0.0

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data was not available.
 Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2020-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$(000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Lima MSA AA	119	15,528	33.3	131	97.8	86.6	56.5	1.3	13.4	0.9	0.0
Springfield MSA AA	1	34	0.3	180	97.5	100.0	37.8	2.2	0.0	0.3	0.0
Toledo MSA AA	1	110	0.3	54	94.0	100.0	72.2	4.6	0.0	1.4	0.0
Non-MSA AA	236	31,350	66.1	689	97.8	76.7	55.3	1.1	23.3	1.1	0.0
Total	357	47,022	100.0	1,054	97.0	80.1	53.3	2.0	19.9	1.0	0.0

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$(000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Lima MSA AA	45	6,242	29.6	--	98.0	93.3	--	1.1	6.7	0.9	0.0
Springfield MSA AA	1	124	0.7	--	98.4	100.0	--	1.4	0.0	0.2	0.0
Toledo MSA AA	0	0	0.0	--	96.4	0.0	--	2.7	0.0	0.9	0.0
Non-MSA AA	106	16,557	69.7	--	98.3	91.5	--	0.9	8.5	0.9	0.0
Total	152	22,923	100.0	--	97.8	92.1	--	1.4	7.9	0.8	0.0

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available; 2022 CRA Aggregate Data was not available.
Due to rounding, totals may not equal 100.0%.*