



PUBLIC DISCLOSURE

January 11, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Citizen National Bank of Upper Sandusky
Charter Number: 18783

100 North Sandusky
Upper Sandusky, OH 43351

Office of the Comptroller of the Currency

Central Ohio Field Office
Westlake Center
4555 Lake Forest Drive, Suite 520
Cincinnati, OH 45252-3760

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.

Table of Contents

OVERALL CRA RATING 1

DESCRIPTION OF INSTITUTION..... 2

SCOPE OF THE EVALUATION 3

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW 5

STATE RATING 6

 STATE OF OHIO.....6

LENDING TEST..... 7

APPENDIX A: SCOPE OF EXAMINATION APPENDIX A-1

APPENDIX B: SUMMARY OF MMSA AND STATE RATINGSAPPENDIX B-1

APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS APPENDIX C-1

APPENDIX D: TABLES OF PERFORMANCE DATA APPENDIX D-1

Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is primarily based on the non-MSA AA. This includes Wyandot, Hardin, Hancock, Crawford, and Marion county.
- The bank exhibits a reasonable distribution of home loans to individuals of different income levels, small loans to businesses, and small loans to farms.
- The bank’s geographic distribution of loans is reasonable.
- The bank’s loan-to-deposit ratio (LTD) is reasonable.
- A majority of the bank’s loans are inside its assessment area (AA).

Loan-to-Deposit Ratio

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

The bank’s quarterly average LTD ratio over the last 12 quarters is 80.5 percent. The ratio ranged from a low of 76.7 percent in March 2017 and a high of 84.3 percent in September 2017.

The bank’s LTD ratio is above peer average. The loan to deposit ratio has remained fairly stable over the past year, and the average has moved more in line with peer. Loan growth in early 2020 increased the LTD ratio briefly, but historical data indicates a relatively stable ratio since the last exam.

Lending in Assessment Area

A substantial majority of the bank’s loans are inside its assessment areas (AAs).

The bank originated and purchased 75.1 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.

Table D - 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	185	78.7	50	21.3	235	22,686	64.8	12,337	35.2	35,032
Small Business	174	67.7	83	32.3	257	26,332	54.9	21,633	45.1	47,965
Small Farm	119	78.8	32	21.2	151	16,193	78.8	4,358	21.2	20,551
Total	478	75.1	165	24.9	643	65,211	66.2	38,328	33.8	103,548

*Source: Bank Data
Due to rounding, totals may not equal 100.0%*

Description of Institution

The First Citizens National Bank of Upper Sandusky (FCNB or bank) is a national bank headquartered in Upper Sandusky, OH. The city is located 70 miles north of Columbus, OH and 48 miles east of Lima, OH. As of September 30, 2020, FCNB had \$308 million in total assets, with tier one capital of \$42.8 million.

FCNB offers traditional banking products and services. The primary products consist of residential real estate loans, commercial, and agricultural lending. Based on September 2020 call report, the bank's net loans and leases total \$181.5 million. Residential real estate loans comprise 27.6 percent of loans and 110 percent of capital.

FCNB has eight branch locations in Ohio. The branch locations include: two in Upper Sandusky (Wyandot County), one in Carey (Wyandot County), one in Nevada (Wyandot County), one in Dunkirk (Hardin County), one in Powell (Delaware County), and two in Marion (Marion County). Six of these locations have on-site deposit taking ATMs. The Marion location is new since the prior examination. In addition to the eight branch locations, FCNB has four ATM locations. These locations include: three in Upper Sandusky and one in Carey. FCNB does not have a holding company or affiliate. There are no merger or acquisition activities that affected the scope of the bank's operations during the evaluation period.

FCNB is a single-state financial institution operating in Ohio, the bank's only rating area. The bank operates in two assessment areas (AA). The non-MSA AA includes the following counties: Wyandot, Hardin, Hancock, Crawford, and Marion. The Columbus MSA AA only includes two tracts in Delaware County. Based on the 2019 census tract (CT), all twelve branch and ATM locations are within a middle-income or upper-income tract. The bank has exposure in low-to-moderate-income tracts within only Marion County.

There are no financial, legal, or other factors that would hinder FCNB's ability to meet the credit needs in the AA. The bank's previous CRA evaluation was conducted December 4, 2017 and resulted in a Satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC conducted a full-scope Community Reinvestment Act (CRA) evaluation to assess the bank's record of meeting credit needs within the Non-MSA AA. This includes low- and moderate-income (LMI) areas. Given the limited exposure in the MSA AA, the OCC performed a limited scope review in the MSA AA. For CRA analysis purposes, the bank's primary lending product include retail, commercial, and agricultural banking. The OCC reviewed lending activity from January 2017 to December 2019. The evaluation included a review of all originated and purchased home mortgages loans for 2017, 2018, and 2019. The OCC used the loans originated and purchased inside the AA to evaluate the bank's performance relative to the geographic and borrower-income distribution. Based on the loan volumes observed in the AAs, the OCC gave substantially similar weight to home and business lending, with less weight to farm lending.

For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census, and 2018 and 2019 Dun and Bradstreet (D&B) data. Please refer to the table in appendix A for more information on the scope of the review. Loan originations during the exam period reflect a total origination in residential loans of 27 percent on average in loan number, and 14 percent in dollar volume. Commercial loans, during the exam period, reflect a total origination of 23 percent on average in loan originations, and 43 percent in dollar volume. Farm loans, during the exam period, reflect a total origination of 18 percent in loan originations, and 25 percent in dollar volume.

Selection of Areas for Full-Scope Review

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

FCNB operates in two AAs. This includes a non-MSA AA and Columbus MSA AA. We completed a full-scope review of the bank's Non-MSA AA, and a limited scope review of the Columbus MSA AA. The limited scope review is due to the bank's limited exposure with only two census tracts. FCNB has one office within the MSA AA. Total deposit market shares in the MSA AA are low at 0.15 percent, placing FCNB as the second smallest of fourteen deposit taking institutions in the MSA AA.

Ratings

The rating is based on activity in the non-MSA AA.

Based on the loan volumes observed in the AAs, the OCC gave substantially similar weight to home and business lending, with less weight to farm lending. The OCC completed a full-scope review of the non-MSA AA and a limited-scope review of the Columbus MSA AA.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Ohio

CRA rating for the State of Ohio: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- FCNB exhibits a reasonable distribution of loans to individuals of different income levels.
- The bank's geographic distribution of loans is reasonable.

Description of Institution's Operations in Ohio

FCNB operates primarily within a non-MSA AA. The Non-MSA AA includes five counties (Crawford, Hancock, Hardin, Marion, and Wyandot). The AA is contiguous, meets the requirement of the regulation, and does not arbitrarily exclude any LMI areas. Within the AA, the bank has seven branch locations. Five of these locations have on-site deposit. In addition to these branch locations, there are four additional ATM locations.

Based on the 2015 ACS U.S Census data, within the Non-MSA AA there are three low-income, five moderate-income, 11 middle-income, and eight upper-income CTs. There were no changes in the assessment area during the review period. The median housing value in the Non-MSA was \$103,699. The median family income was \$55,785, and low-income families earn less than \$30,500. This means that the median housing value is at least 3.4 times the annual income of low-income families in the AA. There are 44,849 total housing units in the AA, of which 64.5 percent are owner-occupied and 27.1 percent are rental units. The poverty rate is substantial, as 11.2 percent of families and 14.2 percent of households live below the poverty line.

During the evaluation period, the local economy has improved with unemployment decreasing year-over-year in each assessment area. The statewide Ohio unemployment rate has decreased from 6.1 percent in January 2017 to 5.2 percent in November 2020. In 2019, within two of the counties, Hancock and Wyandot, the local unemployment rate was lower than the national and state unemployment at 3.2 percent and 3.1 percent, respectively. The remaining three counties, Crawford, Hardin, and Marion, each had a local unemployment higher than the national unemployment at 4.7 percent, 4.2 percent, and 4.1 percent. The Ohio state unemployment for 2019 was 4.1 percent, while the national unemployment rate was 3.5 percent. Major employers within the bank's assessment area include Bucyrus Precision Tech, Inc, Marathon Petroleum Co. LLC, Hardin Memorial Hospital, Whirlpool Corporation, Bridgestone APM and Kasai North American.

FCNB operates in a highly competitive market with national and regional banks. According to the Federal Deposit Insurance Corporation's (FDIC's) Deposit Market Share Report as of June 30, 2019, there are 13 deposit-taking financial institutions in the Non-MSA AA. FCNB has the lowest market share of all institutions with \$226 million in deposits, which represents 0.32 percent deposit market

share. The top five financial institutions based on market share include: JP Morgan Chase Bank, NA, The Huntington National Bank, First Commonwealth Bank, Fifth Third Bank, and PNC Bank, NA.

(Non-MSA AA)

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	10.7	17.9	39.3	28.6	3.6
Population by Geography	105,566	8.4	12.4	40.2	33.7	5.4
Housing Units by Geography	44,849	9.7	13.5	42.9	33.9	0.0
Owner-Occupied Units by Geography	28,906	5.7	11.0	44.0	39.3	0.0
Occupied Rental Units by Geography	11,464	15.8	16.8	42.6	24.8	0.0
Vacant Units by Geography	4,479	20.2	21.0	36.5	22.4	0.0
Businesses by Geography	4,564	11.2	6.9	41.5	40.3	0.2
Farms by Geography	520	1.5	1.5	46.3	50.4	0.2
Family Distribution by Income Level	28,086	19.4	18.7	21.5	40.4	0.0
Household Distribution by Income Level	40,370	22.0	17.1	18.7	42.2	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$103,699
			Median Gross Rent			\$676
			Families Below Poverty Level			11.2%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Ohio

FCNB operates in two AAs. This includes a non-MSA AA and the Columbus, Ohio MSA. We completed a full-scope review of the bank's Non-MSA AA, and a limited scope review of the Columbus, Ohio MSA. The assessment area of Crawford, Hancock, Hardin, Marion, and Wyandot county were combined, analyzed, and presented into the non-MSA AA for the purposes of this evaluation. The limited scope review for the Columbus, Ohio MSA is due to the bank's small deposit market share in the AA. Please refer to appendix A for a list of all AAs under review.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review the bank’s performance in the non-MSA AA is good.

Distribution of Loans by Income Level of the Geography

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

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

FCNB has originated a reasonable amount of home mortgage loans inside the non-MSA AA. The bank did not originate or purchase any loans in the low-income CTs, which is below the aggregate percentage (2.8 percent) of mortgage loans in low-income CTs and below the demographic data (5.7 percent). However, the bank originated 1.1 percent of its mortgage loans in moderate-income CTs, though this remains below the aggregate percent (11.0 percent) of mortgage loans and demographic data (10.8 percent).

The OCC considered several contextual matters in its analysis. FCNB's office locations are primarily middle-income CTs and are not in the immediate vicinity of the low-income CTs. Furthermore, competition in the AA is fierce with thirteen competing financial institutions, and FCNB maintaining the lowest market share.

Small Loans to Businesses

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

Over the examination period, the bank originated 174 small loans to businesses. Small loans to businesses include loans less than or equal to \$1.0 million to commercial businesses. Out of this 3.4 percent were originated in low-income tracts. This is lower than both demographics (11.2 percent) and aggregate data (7.8 percent). In addition to this, management originated 2.3 percent of bank loans in moderate-income tracts. This is also lower than both demographics (6.9 percent) and aggregate data (5.9 percent).

The small level of loan originations is primarily due to the bank's lack of resources in comparison to competition. Additionally, the bank is primarily located within middle-income CTs, with limited access to low-income CTs.

Small Loans to Farm

Refer to Table S in the state of Ohio section of appendix D for the facts and data regarding the geographic distribution of the bank's origination and purchases of farm loans.

Over the exam period, the bank originated 119 farm loans. Small loans to farms include loans less than or equal to \$500 thousand to farms. Loans in the low-income tract were limited at 0.8 percent. The bank did not originate small farm loans in a moderate-income tract. The aggregate data (0 percent) and

geographic data (1.5 percent) support limited opportunities for loan originations in both low- and moderate-income tracts.

Lending Gap Analysis

The OCC reviewed summary reports and analyzed the bank's home mortgage lending over the evaluation period to identify any significant gaps in the geographic distribution of loans. The OCC did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

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 that FCNB made to low, moderate, middle, and upper-income borrowers to the percentage distribution of families by income level (demographic data) in the AA, 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) in the AA, as demonstrated by HMDA aggregate data.

The bank's loans to low-income borrowers was 8.6 percent. This was below the geographic data of 19.4 percent, but above the aggregate data of 7.0 percent. Regarding moderate-income borrowers, the bank originated 11.4 percent of the loans to moderate-income borrowers. This is below the aggregate data (22.5 percent) and geographic data (18.7 percent). The OCC noted that the poverty rate for families is substantial at 11.2 percent. In addition, the median housing value of \$103,699 is significantly above the maximum income for low-income borrowers (\$27,892). This creates a barrier to homeownership and limits mortgage demands. Refer to the "Description of Institution's Operation in Ohio" section for more details on the median price of housing in the AA.

Small Loans to Businesses

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

Over the exam period, the bank originated 174 small loans to businesses inside the AA. Small loans to businesses include loans less than or equal to \$1.0 million to commercial businesses. Approximately, 11.5 percent of these loans originated to new start-up businesses, or with unreported revenues. Loan origination to businesses of less than \$1 million in revenues in the Non-MSA is 67.8 percent, which is lower than the demographic comparator data (77.3 percent), but exceeds the aggregate (42.4 percent) comparator data.

Small Loans to Farm

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

Over the exam period, the bank originated 119 small loans to farms. Small loans to farms include loans less than or equal to \$500 thousand. Approximately, 6.7 percent of these loans were to farms that did not report revenue. The remaining loan originations (88.2 percent) were lower than the demographic comparator data (97.3 percent) but significantly higher than the aggregate comparator data (43.5 percent).

Responses to Complaints

We reviewed the complaint log and did not identify any complaints issued regarding FCNB's CRA performance.

Conclusions for Area Receiving a Limited Scope Review

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

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2017 – 12/31/2019	
Bank Products Reviewed:	Home mortgage Business Farm	
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		
Non-MSA AA	Full scope	The Non-MSA AA includes Crawford, Hancock, Hardin, Marion, and Wyandot
Columbus MSA AA	Limited scope	Includes two CTs in Delaware County.

Appendix B: Summary of MMSA and State Ratings

RATINGS	FCNB Upper Sandusky
Overall Bank:	Lending Test Rating
The First Citizens National Bank of Upper Sandusky	Satisfactory
State:	
Ohio	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
MSA	0	0	0.0	861	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0
Non-MSA	185	22,686	100.0	2,742	5.7	0.0	2.8	11.0	1.1	10.8	44.0	63.2	42.3	39.3	35.7	44.0	0.0	0.0	0.0
Total	185	22,686	100.0	3,603	5.0	0.0	2.2	9.7	1.1	8.2	38.9	63.2	32.2	46.3	35.7	57.4	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
MSA	0	0	0.0	861	3.1	0.0	1.4	4.9	0.0	3.7	8.8	0.0	8.2	83.2	0.0	76.1	0.0	0.0	10.6
Non-MSA	185	22,686	100.0	2,742	19.4	8.6	7.0	18.7	11.4	22.5	21.5	25.9	24.1	40.4	42.2	31.2	0.0	11.9	15.2
Total	185	22,686	100.0	3,603	17.6	8.6	5.7	17.2	11.4	18.0	20.1	25.9	20.3	45.1	42.2	41.9	0.0	11.9	14.1

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-19

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
MSA	2	186	1.1	431	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	1.1	100.0	0.0	0.0	0.0
Non-MSA	172	26,146	98.9	884	11.2	3.4	7.8	6.9	2.3	5.9	41.5	58.0	41.4	40.3	35.1	44.9	0.2	0.0	0.0
Total	174	26,331	100.0	1,315	8.9	3.4	5.2	5.5	2.3	4.0	32.9	58.0	27.8	52.6	36.2	63.0	0.1	0.0	0.0

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-19

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MSA	2	186	0.0	431	91.3	1.1	55.9	3.6	0.0	5.1	0.0
Non-MSA	172	26,146	100.0	884	77.3	67.8	42.4	5.7	19.5	17.0	11.5
Total	174	26,331	100.0	1,315	80.2	68.9	46.8	5.3	19.5	14.5	11.5

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-19

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
MSA	--	--	--	2	0.0	--	0.0	0.0	--		0.0	--	0.0	100.0	--	100.0	0.0	--	0.0
Non-MSA	119	16,193	100.0	124	1.5	0.8	0.0	1.5	0.0	0.0	46.3	34.5	45.2	50.4	64.7	54.8	0.2	0.0	0.0
Total	119	16,193	100.0	126	1.5	0.8	0.0	1.5	0.0	0.0	43.7	34.5	44.4	53.2	64.7	55.6	0.2	0.0	0.0

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-19

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
MSA	0.0	0.0	0.0	2	100.0	0.0	50.0	0.0	0.0	0.0	0.0
Non-MSA	119	100.0	100	124	97.3	88.2	43.5	1.5	5.0	1.2	6.7
Total	119	100.0	100	126	97.5	88.2	43.7	1.5	5.0	1.1	6.7

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