



## PUBLIC DISCLOSURE

July 8, 2024

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank in New Bremen  
Charter Number 14294

435 South Washington Street  
New Bremen, OH 45869

Office of the Comptroller of the Currency

Central Ohio – Indiana Office  
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.

## Table of Contents

Overall CRA Rating .....	1
Description of Institution.....	2
Scope of the Evaluation.....	3
Discriminatory or Other Illegal Credit Practices Review .....	4
State Rating .....	5
State of Ohio.....	5
Community Development Test.....	11
Appendix A: Scope of Examination .....	A-1
Appendix B: Summary of State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

## **Overall CRA Rating**

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

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

**The Community Development Test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating of satisfactory is based on the state of Ohio rating, including a reasonable geographic distribution of loans in the assessment area (AA) and a reasonable distribution of loans to businesses and farms of different sizes.
- The Community Development (CD) Test rating is based on the state of Ohio rating. The bank demonstrates adequate responsiveness to CD needs in its AA by engaging in a combination of CD loans, qualified investments, and CD services.
- On a bank-wide basis, the loan-to-deposit (LTD) ratio is reasonable, and a substantial majority of loans are made inside the AA.

### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

The First National Bank in New Bremen's (FNB or bank) quarterly average LTD ratio over the 12 quarters since the previous Community Reinvestment Act (CRA) Performance Evaluation (March 31, 2021, to December 31, 2023) was 35.9 percent. The ratio ranged from a quarterly low of 32 percent as of December 31, 2023, to a quarterly high of 39.1 percent as of March 31, 2021. Examiners compared the bank's LTD ratio to a peer group of four similarly situated financial institutions with total assets between \$166 million and \$730 million and headquartered in Auglaize, Shelby, and Mercer Counties. The quarterly average LTD ratio for similarly situated financial institutions was 60.6 percent for the same time period, ranging from 45.7 percent to 89.9 percent. FNB ranked the lowest compared to the other four similarly situated financial institutions headquartered in the AA.

Several factors contributed to the bank's lower than peer LTD ratio. FNB's lending strategy is conservative and there is strong competition for high credit quality borrowers in the local market. The volume of mortgage banking activity also impacted FNB's lower-than-peer LTD ratio. During the evaluation period, FNB sold \$15.5 million home mortgage loans to the secondary market.

Furthermore, FNB's total deposits increased from \$356.9 million as of March 31, 2021, to \$400.8 million as of December 31, 2023. Per discussions with management, the increase was

impacted by the Government’s stimulus programs in response to COVID-19, including the Small Business Administration’s (SBA) Paycheck Protection Program (PPP). The bank originated a significant volume of SBA PPP loans as discussed under the CD Test.

### Lending in Assessment Area

A substantial majority of the bank’s loans are inside its AA.

The bank originated and purchased 90.8 percent of its total loans inside the bank’s AA 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		
	#	%	#	%		\$	%	\$	%	
Small Business	56	93.3	4	6.7	60	12,311	96.9	392	3.1	12,703
Small Farm	53	88.3	7	11.7	60	5,613	88.0	768	12.0	6,381
Total	109	90.8	11	9.2	120	17,924	93.9	1,160	6.1	19,084

*Source: 2021, 2022, and 2023 Bank Data, based on transaction testing.  
Due to rounding, totals may not equal 100.0%.*

### Description of Institution

FNB is an independently owned community bank headquartered in New Bremen, Ohio, in Auglaize County. The main office is in New Bremen, Ohio, in an upper-income census tract (CT) approximately 90 miles northwest of Columbus, Ohio. In addition, FNB has four full-service branch offices in Ohio, which are in New Knoxville, Wapakoneta, Botkins, and Sidney. The first two listed branches are in Auglaize County, Ohio, and the latter two branch offices are in Shelby County, Ohio. Each office has a drive-thru facility and a 24-hour automated teller machine (ATM). All five offices are in middle- and upper-income CTs. No branches have been opened or closed since the last CRA evaluation in June 2021. FNB does not have a holding company or any affiliates. There was no merger or acquisition activity that affected the scope of the bank’s operations during the evaluation period.

FNB is a single-state financial institution with one rating area (Ohio) and one AA. The AA includes all CTs in Auglaize County and Shelby County and two CTs in Mercer County (9678 and 9679). The AA is not part of a Metropolitan Statistical Area (MSA). The entire AA (OH Non-MSA) is contiguous and does not appear to arbitrarily exclude low- and moderate-income areas nor reflect illegal discrimination. The AA is further described in the “Description of Institution’s Operations in Ohio” section in this evaluation.

FNB offers a wide variety of deposit and lending products through their full-service banking offices to accommodate their customers, including business, farm, home mortgage, and consumer loans. There are no substantial differences in the business focus or services offered between the bank’s branches. Additionally, the bank offers online and mobile banking.

As of December 31, 2023, FNB had total assets of \$437 million with tier 1 capital of \$41.9 million. The bank's loan portfolio totaled \$130.4 million, with total loans representing 29.8 percent of total assets. As of the December 31, 2023, Consolidated Report of Condition and Income (Call Report), commercial and commercial real estate (business) loans represented the largest percentage of total loans at 38.3 percent followed by home mortgage loans (including multifamily loans), farm loans, and consumer loans at 36.4, 23.8, and 1.5 percent, respectively. During the three-year evaluation period (2021 – 2023) and based on bank loan production reports, 46.5 percent of the number of loans originated (by unit, not dollar amount) were business loans followed by farm, consumer, and home mortgage at 25.3, 14.9 and 13.3 percent, respectively. Based on dollar volume, business loans represented 69.3 percent of total loan originations during the evaluation period, with farm loans representing 19.7 percent. These totals excluded SBA PPP loans originated in 2021 as business loans as they were accounted for as CD loans in this evaluation. The bank's primary lending focus includes business and farm lending.

There are no financial, legal, or other factors that impede FNB's ability to help meet the credit and CD needs of its AA. The bank's previous CRA evaluation was dated June 28, 2021, and resulted in a Satisfactory rating.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

This performance evaluation assesses the bank's record of meeting the credit and CD needs of its entire community, including low- and moderate-income areas. The Office of the Comptroller of the Currency (OCC) assessed performance using intermediate small bank CRA evaluation procedures, which includes a Lending Test and CD Test. The Lending Test reflects evaluation of the FNB's record in meeting the credit needs of the AA through use of its primary loan products. The CD Test reflects evaluation of FNB's responsiveness to the CD needs of its AA through use of loans, qualified investments, and services with a CD purpose. FNB became an intermediate small bank for CRA purposes beginning on January 1, 2022. However, FNB provided CD loan, investment, and service activity for the entire evaluation period for analysis. The OCC analyzed lending and CD activity in full-year increments during the evaluation period, January 1, 2021, to December 31, 2023.

The OCC evaluated the bank's lending performance based on its primary lending products during the evaluation period, which was business and farm lending. As discussed above, business loans represented 46.5 percent of total loan originations based on the number of loans originated during the evaluation period and 69.3 percent based on dollar volume of loan originations. Farm loans represented 25.3 percent based on number and 19.7 percent based on dollar volume. Consumer and home mortgage loans were not considered in this evaluation as these loan types did not constitute a substantial majority of the bank's lending. Bank management did not request consideration of these loans. The OCC transaction tested business and farm loans for each year of the evaluation period. Examiners tested 20 loans per year per loan type. A minimum of at least 20 loans were needed in a loan product and in each year for a meaningful analysis. For analysis purposes, examiners compared the bank's business and farm lending performance with the Dun

and Bradstreet (D&B) data as of June 2021 and June 2023, as well as the aggregate data reported by all CRA lenders in the AA.

This evaluation period included two census periods. The demographic data presented in this evaluation is either from the 2015 American Community Survey (ACS) for 2021 or the 2020 U.S. Census for 2022 to 2023. Two sets of tables are included in Appendix D for each census period.

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

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

FNB has one AA 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 OH Non-MSA.

### **Ratings**

The bank’s overall rating is based on the state of Ohio rating. The state rating is based on performance in the bank’s only AA, the OH Non-MSA. Based on total loan originations during the evaluation period, more weight was placed on business loans over farm loans. Refer to the “Scope” section under the state rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

Pursuant to 12 CFR 25.28(c), 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:** Satisfactory.

The major factors that support this rating include:

- FNB exhibits a reasonable geographic distribution of loans in the AA and a reasonable distribution of loans to businesses and farms of different sizes.
- FNB demonstrates adequate responsiveness to CD needs in its AA by engaging in a combination of CD loans, qualified investments, and CD services.
- FNB has not received any complaints about its performance in helping to meet the AA's credit needs during the evaluation period.

### Description of Institution's Operations in Ohio

FNB designated one AA in Ohio, the OH Non-MSA. Management selected the AA based on its targeted lending area and office locations. The AA is contiguous and does not appear to reflect illegal discrimination, nor does it arbitrarily exclude low- and moderate-income areas. The AA is not located in an MSA.

During the evaluation period, the OH Non-MSA included Auglaize County, Shelby County, and CTs 9678 and 9679 in Mercer County. The bank has three offices in Auglaize County, which are New Bremen, Wapakoneta, and New Knoxville. Wapakoneta is the county seat and largest city in Auglaize County. The bank has two branches in Shelby County, which are Sidney and Botkins. Sidney is the county seat and largest city in Shelby County. As of the 2020 U.S. Census, all five offices are in middle- and upper-income CTs. Each office has a drive-thru facility and an ATM.

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

OH Non-MSA

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: OH Non-MSA (2021)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	23	0.0	8.7	34.8	56.5	0.0
Population by Geography	103,605	0.0	7.1	31.3	61.6	0.0
Housing Units by Geography	43,883	0.0	8.0	34.3	57.7	0.0
Owner-Occupied Units by Geography	29,276	0.0	4.5	31.1	64.4	0.0
Occupied Rental Units by Geography	10,722	0.0	14.6	39.2	46.2	0.0
Vacant Units by Geography	3,885	0.0	16.1	45.2	38.7	0.0
Businesses by Geography	5,690	0.0	11.0	29.4	59.6	0.0
Farms by Geography	700	0.0	2.0	17.9	80.1	0.0
Family Distribution by Income Level	28,056	13.3	16.6	20.0	50.2	0.0
Household Distribution by Income Level	39,998	16.2	15.2	18.4	50.1	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$132,256
			Median Gross Rent			\$670
			Families Below Poverty Level			6.4%
<p><i>Source: 2015 ACS and 2021 D&amp;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>						



<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: OH Non-MSA (2022 – 2023)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	23	0.0	0.0	56.5	43.5	0.0
Population by Geography	104,170	0.0	0.0	53.3	46.7	0.0
Housing Units by Geography	44,723	0.0	0.0	57.4	42.6	0.0
Owner-Occupied Units by Geography	30,423	0.0	0.0	52.4	47.6	0.0
Occupied Rental Units by Geography	10,693	0.0	0.0	67.0	33.0	0.0
Vacant Units by Geography	3,607	0.0	0.0	70.9	29.1	0.0
Businesses by Geography	9,857	0.0	0.0	52.5	47.5	0.0
Farms by Geography	975	0.0	0.0	39.5	60.5	0.0
Family Distribution by Income Level	28,158	13.7	14.4	21.0	51.0	0.0
Household Distribution by Income Level	41,116	16.4	13.6	18.3	51.8	0.0
Median Family Income Non-MSAs - OH		\$66,684	Median Housing Value			\$154,395
			Median Gross Rent			\$759
			Families Below Poverty Level			7.0%
<i>Source: 2020 U.S. Census and 2023 D&amp;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 OH Non-MSA was 103,605, with 7.1 percent living in moderate-income CTs, 31.3 percent in middle-income CTs, and 61.6 percent in upper-income CTs. The AA consisted of 23 CTs, and was comprised of two moderate-income, eight middle-income, and 13 upper-income CTs. The AA included 28,056 families and 39,998 households.

As of the 2020 U.S. Census data in the table above, the population of the OH Non-MSA was 104,170, with 53.3 percent living in middle-income CTs and 46.7 percent in upper-income CTs. The AA consisted of 23 CTs and was comprised of 13 middle-income CTs and 10 upper-income CTs. The AA included 28,158 families and 41,116 households.

**Affordable Housing Cost**

According to 2015 ACS U.S. Census data, the median housing value in the AA was \$132,256 and the median family income for non-MSAs in Ohio was \$55,785. There were 43,883 housing units in the AA, of which 66.7 percent were owner-occupied, 24.4 percent were rental-occupied, and 8.9 percent were vacant. Low-income families made up 13.3 percent of the families in the AA and moderate-income families made up 16.6 percent of the families in

the AA. Families living below the poverty level was 6.4 percent as referenced in the above table.

According to 2020 U.S. Census data, the median housing value in the AA was \$154,395 and the median family income for non-MSAs in Ohio was \$66,684. There were 44,723 housing units in the AA, of which 68 percent were owner-occupied, 23.9 percent were rental-occupied, and 8.1 percent were vacant. Low-income families made up 13.7 percent of the families in the AA and moderate-income families made up 14.4 percent of the families in the AA. Families living below the poverty level was 7 percent as referenced in the above table.

### Job Market and Economic Conditions

The average annual unemployment rate for the state of Ohio and each county in the AA gradually improved each year during the evaluation period. Comparatively, the unemployment rate for each county in the AA was lower than the state of Ohio. The following table summarizes these unemployment rates.

<b>Average Annual Unemployment Rates</b>			
	<b>2021</b>	<b>2022</b>	<b>2023</b>
State of Ohio	5.1	4.0	3.5
Auglaize County	3.8	3.1	2.6
Mercer County	3.2	2.7	2.3
Shelby County	4.2	3.5	3.1

*Source: Bureau of Labor Statistics; Rates Not Seasonally Adjusted.*

The local economy has been improving. The AA has a diverse mix of companies across many industries with a significant presence of manufacturing companies and retail trade services. According to management, the major employers in the AA include Crown Equipment Corporation, Grand Lake Health System, Honda of America Manufacturing, Mercer Health, Maria Stein Grain, Nidec Minster Corporation, Danone, Wilson Health, and Ferguson Construction. Other major employers include local governments, school systems, and retailers.

### Competition

Competition for deposits in the AA is strong with many national banks, savings and loan associations, branches of larger financial institutions, and credit unions. As of June 30, 2023, FNB had an 8.8 percent deposit market share in Auglaize, Shelby, and Mercer Counties and was ranked sixth out of eighteen financial institutions. FNB held approximately \$374.2 million in total deposits. There were 18 financial institutions in Auglaize, Shelby, and Mercer Counties, with a total of 55 offices. The top five financial institutions included The Peoples Bank Co., Minister Bank, U.S. Bank, National Association (N.A.), First Financial Bank, and JPMorgan Chase Bank, N.A, and accounted for 60.4 percent of the total deposits in these three counties. The source of the deposit market share information was the June 30, 2023, Deposit Market Share Report from the Federal Deposit Insurance Corporation (FDIC).

Business lending (small loans to businesses) is a primary business focus for FNB. According to the 2022 Peer Small Business Data, there were 64 lenders originating 2,317 small business loans in Auglaize, Shelby, and Mercer Counties. Three financial institutions dominated the small business lending market share in the AA, accounting for 49.3 percent of the number of small

business loans originated. The top three banks were U.S. Bank, N.A., JPMorgan Chase Bank, N.A, and American Express National Bank, which are much larger than FNB. FNB is not a CRA loan reporter; therefore, the bank’s data was not included in the Peer Small Business Data Report. According to the D&B Data for June 2023, the AA had 9,857 non-farm businesses. The total number of non-farm businesses with gross revenues of \$1 million or less was 8,535, which represented 86.6 percent of all non-farm businesses. Additionally, 64.5 percent of the businesses had fewer than five employees, 1.7 percent of the businesses were headquartered in the bank’s AA, and 91.4 percent operated from a single location.

Farm lending is also a primary business focus for FNB. According to the D&B Data for June 2023, the AA had 975 farms. The total number of farms with gross revenues of \$1 million or less was 956, which represented 98.1 percent of all farms.

#### 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. General needs in the community include heat/utility, food, and medical assistance. Other needs include affordable housing, mental health services/counseling, substance abuse services, dental care, childcare, and public transportation. Affordable housing and construction of residential housing are credit needs in the AA. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

### **Scope of Evaluation in Ohio**

The OCC performed a full-scope review of the OH Non-MSA. The data in the AA was analyzed and presented as one AA for the purposes of this evaluation. Business and farm lending are the bank’s primary lending products and were evaluated under the Lending Test. Business loans were given more weight given the significant volume originated and purchased during the evaluation period. The OCC transaction tested 20 business and 20 farm loans each year of the evaluation period. Examiners analyzed CD loans, investments, and services during all three years of the evaluation period, as discussed above. Refer to the “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 Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s lending performance in the state of Ohio is reasonable.

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

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

As of the 2015 ACS U.S. Census, the AA included two moderate-income geographies, CT 403 in Auglaize County and CT 9720 in Shelby County. Both geographies changed to middle-income as of the 2020 U.S. Census. There were no low-income geographies during the evaluation period.

The OCC did not complete an analysis of the distribution of loans by income level of the geography for 2022 and 2023. As of the 2020 U.S. Census, the AA did not include any low- and moderate-income CTs. Therefore, a review of the geographic distribution of loans would not be meaningful.

### ***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.

As of the 2021 analysis, the overall geographic distribution of small loans to businesses was excellent. In 2021, the percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in those geographies and exceeded the aggregate percentage of all reporting lenders. There were no low-income geographies in the AA during the evaluation period.

### ***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.

As of the 2021 analysis, the overall geographic distribution of small loans to farms was reasonable. In 2021, the bank did not originate any small loans to farms in moderate-income CTs. However, only two percent of the farms in the AA were in moderate-income CTs with no CRA lenders (CRA aggregate data) reporting any loans in those tracts. There were no low-income geographies in the AA during the evaluation period.

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

The OCC did not identify any unexplained, conspicuous gaps in the lending distribution during the review of bank reports and maps. Examiners noted that loans were made in all three counties in the AA during the evaluation period.

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

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

### ***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.

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 AA.

FNB exhibited an overall reasonable distribution of small loans to businesses of different sizes.

In the 2021 analysis, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less (demographic data) but exceeded the aggregate percentage of all reporting lenders (CRA aggregate data).

In the 2022 – 2023 analysis, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below demographic data and slightly below the aggregate percentage of all reporting lenders (CRA aggregate data).

### ***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.

FNB exhibited an overall excellent distribution of small loans to farms of different sizes.

In the 2021 analysis, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less (demographic data) but exceeded aggregate data reported by all reporting lenders (CRA aggregate data).

In the 2022 – 2023 analysis, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was below demographic data but exceeded aggregate data reported by all reporting lenders (CRA aggregate data).

### **Responses to Complaints**

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

## **Community Development Test**

The bank's performance under the CD Test in the state of Ohio is rated Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate 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 AA.

FNB was responsive to the COVID-19 pandemic and its level of CD loans were impactful. FNB's participation in the SBA's PPP was responsive to the credit needs of the businesses in the AA and statewide. The PPP loans originated in 2021 met the definition of CD as part of the 2020 OCC CRA Rule and the expanded CD definitions.

### Number and Amount of Community Development Loans

The number and dollar amount of qualified CD loans represent excellent responsiveness, considering the bank's capacity and the need and availability of such opportunities for CD in the AA. During the evaluation period, FNB originated a total of 391 qualified CD loans totaling \$18.3 million or 43.7 percent of tier 1 capital as of December 31, 2023. Most of these loans were made through the SBA PPP, an innovative and flexible loan program to help businesses keep their workforces employed during the COVID-19 pandemic.

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.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
OH Non-MSA	352	90.0	16,127	88.1
Statewide/Regional Area with Indirect Benefit	39	10.0	2,183	11.9
TOTAL	391	100.0	18,310	100.0

#### OH Non-MSA

FNB exhibits excellent responsiveness to CD needs in the AA through CD loans. During the evaluation period, FNB originated a total of 352 qualified CD loans in the AA totaling \$16.1 million or 38.4 percent of tier 1 capital as of December 31, 2023. These loans were responsive to CD needs for CD services targeted to low- and moderate-income individuals and economic development in the AA.

The SBA PPP loans were responsive to the credit needs of businesses during the evaluation period. Beginning in early 2020, the global economy was adversely affected by the COVID-19 pandemic, which spread worldwide and caused deteriorating economic conditions resulting from stay-at-home orders and businesses shutting down to lessen the spread and impact of the virus.

FNB responded to customers facing financial hardship during the pandemic by participating in the SBA’s PPP, which provided small and mid-sized businesses impacted by the pandemic with funds to cover payroll costs and other expenses. FNB originated a total of 345 PPP loans within their AA providing approximately \$11.8 million in critical funding to businesses. This PPP loan volume represented 28.2 percent of tier 1 capital as of December 31, 2023. Six of the 345 PPP loans were originated in a moderate-income geography, totaling \$406,615.

Additionally, the bank originated seven loans totaling \$4.4 million to organizations in Ohio that provide job training and support services for disabled individuals, including low- and moderate-income individuals.

Statewide/Regional

FNB was responsive to the CD needs in its AA so additional consideration was given to 39 PPP loans totaling \$2.2 million in the statewide area of Ohio, representing 5.2 percent of tier 1 capital as of December 31, 2023. These regional/statewide CD loans did not have a purpose, mandate, or function to serve the AA, but the OCC considered these loans because the bank was responsive to CD needs and opportunities within the AA. The PPP loans promoted economic development in the state. Additionally, the bank originated two PPP loans outside Ohio totaling \$29,295.

**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)
OH Non-MSA	0	0	41	21	41	100.0	21	100.0	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 data.

FNB’s qualified CD investment activity represents adequate responsiveness. During the evaluation period, FNB made 41 qualified investments/donations inside the AA totaling \$20,659. Qualified investments consisted of donations and sponsorships to various non-profit organizations. Organizations included community service organizations that target underprivileged children, financial literacy programs, community services for low- and moderate-income individuals, and economic development and revitalization organizations.

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

### **Extent to Which the Bank Provides Community Development Services**

FNB exhibits adequate responsiveness to CD needs through CD services in the AA.

FNB's delivery systems are accessible to the entire AA and individuals of different income levels. The bank offers online and mobile banking. The Federal Home Loan Bank (FHLB) offers a Welcome Home program that provides down payment assistance to low- and moderate-income borrowers that meet specific income criteria. FNB originated two loans in 2021 with FHLB Welcome Home grants totaling \$7,000.

At least five bank employees served 11 qualifying CD organizations during the evaluation period. In 2021, two employees provided financial literacy education to eight different schools through the Cemark program. Two employees provided financial literacy, including safe banking for seniors, to two organizations in 2022. One employee served as a member on an economic development organization from 2021 – 2023.



## 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”).

<b>Time Period Reviewed:</b>	1/1/21 – 12/31/23	
<b>Bank Products Reviewed:</b>	Small business and small farm loans CD loans, qualified investments, and CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not applicable	Not applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State - Ohio</b>		
OH Non-MSA	Full-scope	The AA includes Auglaize and Shelby Counties and CTs 9678 and 9679 in Mercer County.

## Appendix B: Summary of State Ratings

RATINGS: First National Bank in New Bremen			
<b>Overall Bank:</b>	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank in New Bremen	Satisfactory	Satisfactory	Satisfactory
<b>State:</b>			
Ohio	Satisfactory	Satisfactory	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Metropolitan Statistical Area (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

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### Content of Standardized Tables

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

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

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

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



State of Ohio

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
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
OH Non-MSA	20	4,465	100.0	1,562	0.0	0.0	0.0	11.0	15.0	7.6	29.4	30.0	25.6	59.6	55.0	66.8	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>4,465</b>	<b>100.0</b>	<b>1,562</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.0</b>	<b>15.0</b>	<b>7.6</b>	<b>29.4</b>	<b>30.0</b>	<b>25.6</b>	<b>59.6</b>	<b>55.0</b>	<b>66.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 1/1/2021 - 12/31/2021 Bank Data; 2021 CRA 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																			2022-23
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
OH Non-MSA	40	8,265	100.0	1,614	0.0	0.0	0.0	0.0	0.0	0.0	52.5	27.5	47.5	47.6	72.5	52.5	0.0	0.0	0.0
<b>Total</b>	<b>40</b>	<b>8,265</b>	<b>100.0</b>	<b>1,614</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>52.5</b>	<b>27.5</b>	<b>47.5</b>	<b>47.6</b>	<b>72.5</b>	<b>52.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2023 D&B Data; 1/1/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate data was not available.  
Due to rounding, totals may not equal 100.0%.

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
OH Non-MSA	20	4,465	100.0	1,562	78.0	55.0	53.8	7.5	45.0	14.5	0.0	
<b>Total</b>	<b>20</b>	<b>4,465</b>	<b>100.0</b>	<b>1,562</b>	<b>78.0</b>	<b>55.0</b>	<b>53.8</b>	<b>7.5</b>	<b>45.0</b>	<b>14.5</b>	<b>0.0</b>	
<i>Source: 2021 D&amp;B Data; 1/1/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0%.</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022-23</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
OH Non-MSA	40	8,265	100.0	1,614	86.6	52.5	58.0	4.2	47.5	9.2	0.0	
<b>Total</b>	<b>40</b>	<b>8,265</b>	<b>100.0</b>	<b>1,614</b>	<b>86.6</b>	<b>52.5</b>	<b>58.0</b>	<b>4.2</b>	<b>47.5</b>	<b>9.2</b>	<b>0.0</b>	
<i>Source: 2023 D&amp;B Data; 1/1/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate data was not available.                      Due to rounding, totals may not equal 100.0%.</i>												

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2021
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
OH Non-MSA	20	1,928	100.0	207	0.0	0.0	0.0	2.0	0.0	0.0	17.9	25.0	17.4	80.1	75.0	82.6	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>1,928</b>	<b>100.0</b>	<b>207</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>2.0</b>	<b>0.0</b>	<b>0.0</b>	<b>17.9</b>	<b>25.0</b>	<b>17.4</b>	<b>80.1</b>	<b>75.0</b>	<b>82.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 1/1/2021 - 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																			2022-23
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
OH Non-MSA	40	4,286	100.0	129	0.0	0.0	0.0	0.0	0.0	0.0	39.5	27.5	43.4	60.5	72.5	56.6	0.0	0.0	0.0
<b>Total</b>	<b>40</b>	<b>4,286</b>	<b>100.0</b>	<b>129</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>39.5</b>	<b>27.5</b>	<b>43.4</b>	<b>60.5</b>	<b>72.5</b>	<b>56.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2023 D&B Data; 1/1/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 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											2021
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
OH Non-MSA	20	1,928	100.0	207	97.9	95.0	64.7	1.3	5.0	0.9	0.0
<b>Total</b>	<b>20</b>	<b>1,928</b>	<b>100.0</b>	<b>207</b>	<b>97.9</b>	<b>95.0</b>	<b>64.7</b>	<b>1.3</b>	<b>5.0</b>	<b>0.9</b>	<b>0.0</b>

Source: 2021 D&B Data; 1/1/2021 - 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											2022-23
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
OH Non-MSA	40	4,286	100.0	129	98.1	95.0	66.7	0.9	5.0	1.0	0.0
<b>Total</b>	<b>40</b>	<b>4,286</b>	<b>100.0</b>	<b>129</b>	<b>98.1</b>	<b>95.0</b>	<b>66.7</b>	<b>0.9</b>	<b>5.0</b>	<b>1.0</b>	<b>0.0</b>

Source: 2023 D&B Data; 1/1/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate data was not available.  
Due to rounding, totals may not equal 100.0%.