



PUBLIC DISCLOSURE

February 05, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community First Bank, National Association
Charter Number: 7518

118 East Lima Street
Forest, OH 45843

Office of the Comptroller of the Currency

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
Appendix A: Scope of Examination	A-1
Appendix B: Summary of MMSA and 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 major factors that support this rating include:

- The Lending Test rating is based on reasonable overall performance in the State of Ohio. Community First Bank's (CFB or bank) borrower distribution is excellent, while its geographic distribution is reasonable.
- On a bank-wide basis, CFB's average loan-to-deposit (LTD) ratio is reasonable, and a substantial majority of loans are originated inside the assessment area (AA).
- CFB participated in the Small Business Administration's (SBA's) Paycheck Protection Program (PPP) and originated a notable volume of PPP loans that were responsive to the credit needs of farms and businesses during the COVID-19 pandemic.
- CFB did not receive any complaints regarding its CRA performance during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. As calculated on a bank-wide basis, CFB's quarterly LTD ratio averaged 53.3 percent over the 12-quarter period ending December 31, 2022. During this timeframe, the LTD ratio ranged from a low of 48.5 percent to a high of 59.6 percent. CFB's LTD ratio is the second lowest among the five banks with total assets of \$20.5 to \$359.4 million and headquartered in the AA. The median LTD for the group was 59.3 percent and the average LTD ratio for the other four banks ranged from 46.7 to 96.5 percent. The OCC considered CFB's quarterly average LTD ratio would be 70.2 percent if adjusted for unused credit lines, other unused loan commitments, and public funds.

Lending in Assessment Area

A substantial majority of CFB's loans are inside its AA. By number, the bank originated 87.6 percent of its loans inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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	54	80.6	13	19.4	67	7,313	84.9	1,300	15.1	8,613
Small Business	52	98.1	1	1.9	53	1,389	98.4	22	1.6	1,411
Small Farm	57	86.4	9	13.6	66	5,694	78.9	1,521	21.1	7,215
Total	163	87.6	23	12.4	186	14,396	82.2	2,843	17.8	17,239

Description of Institution

CFB is a federally chartered national bank that is wholly owned by a single bank holding company, Community First Bancshares, Inc. Both entities are headquartered in Forest, Ohio, approximately 75 miles northwest of Columbus, Ohio. As a locally owned community bank, CFB offers a variety of loan products, deposit accounts, and online solutions for personal or business banking needs. Available financial products include home mortgage loans, business loans, agriculture loans, installment loans, credit cards, checking and savings accounts, money market accounts, certificates of deposit, individual retirement accounts, and health savings accounts.

CFB is a single-state bank that operates from three offices in northwestern Ohio. In addition to the main office in Forest, Ohio, CFB has a branch in Kenton, Ohio and a branch in Upper Sandusky, Ohio. Each office has an automated teller machine (ATM) and a drive- or walk-up window. Given this market footprint, CFB has one rating area, the State of Ohio, and one AA, the Ohio nonmetropolitan statistical area (OH Non-MSA). Additional information about the AA is discussed below under the Description of Institution's Operations in Ohio.

The bank did not engage in any merger/acquisition activity during the evaluation period. As of December 31, 2022, CFB had total assets of \$61.2 million and tier one capital of \$5.2 million. Deposits totaled \$57.4 million, or 93.7 percent of total assets, and are concentrated in Hardin County. Gross loans and leases of \$30 million represented 49 percent of total assets. The loan portfolio composition and loan originations during the evaluation indicate lending activity is typically centered in home mortgage and farm loans. However, CFB originated a notable volume of commercial loans in 2020 and 2021 due to the participating in the SBA's PPP.

The following tables summarize CFB's loan portfolio composition and deposits.

Loan Portfolio Composition			
Loan Category	Amount (000's)	% of Total Loans/Leases	% of Total Assets
Residential Loans	\$ 15,260	50.9%	24.9%
Farm Loans	\$ 10,244	34.2%	16.7%
Business Loans	\$ 2,920	9.7%	4.8%
Consumer Loans	\$ 1,513	5.1%	2.5%
Other Loans	\$ 38	0.1%	0.1%
Total Loans	\$ 29,975	100.0%	49.0%

Source: Call Report as of December 31, 2022

Deposits			
Office	County	Amount (000s)	% of Total
Forest	Hardin	\$ 35,822	59.7%
Kenton	Hardin	\$ 13,521	22.6%
Upper Sandusky	Wyandot	\$ 10,591	17.7%
Total		\$ 59,934	100.0%

Source: FDIC Summary Deposits Report for June 30, 2022

CFB's lending activities are consistent with its size, expertise, financial capacity, and local economic conditions. There are no legal, financial, or other factors that affect its ability to meet the credit needs of

its AA. The OCC rated CFB's CRA performance "Satisfactory" at the previous evaluation dated January 21, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation considers the bank's CRA performance from January 1, 2020, to December 31, 2022. The OCC assessed this performance using the Interagency Small Bank examination procedures. These procedures comprise the Lending Test and include the following performance criteria:

- LTD ratio;
- percentage of originated and purchased loans made inside the AA;
- lending to borrowers of different income levels and/or businesses and farms of different sizes;
- lending in low- and moderate-income (LMI) areas within the AA; and,
- the bank's record of acting on written complaints regarding its performance in helping meet the credit needs of the AA.

To analyze CFB's performance under the Lending Test, the OCC used loan data from a representative sample of the bank's primary loan products. Home mortgage, farm, and business loans are considered the primary loan products given bank's lending strategy and new loan originations during the evaluation period.

The borrower and geographic loan distributions were analyzed using two time periods, 2020-2021 and 2022. This is due to census changes that became effective in 2022. For the 2020-2021 analysis period, the demographic data used is from the 2015 ACS and 2021 Dunn and Bradstreet (D&B). The demographic data for the 2022 analysis period is from the 2020 ACS and 2022 D&B. Unless otherwise noted, the OCC placed more weight on 2020-2021 as it represents the greater portion of the evaluation period and loan 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.

CFB 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 this AA, the OH Non-MSA AA.

Ratings

CFB operates in a single state and has one AA. Therefore, the rating for the State of Ohio is based solely on its performance in the OH Non-MSA AA. Loan products are weighted equally since CFB originated a similar number of home mortgage, business, and farm loans over the three-year evaluation period.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), 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 major factors that support this rating include:

- a reasonable geographic distribution of small loans to businesses and farms, and
- an excellent borrower distribution of small loans to businesses and farms.

Description of Institution's Operations in Ohio

CFB has three offices within a two-county area in northwestern Ohio. The main office in Forest, Ohio and the branch in Kenton, Ohio are in in Hardin County. The other branch in Upper Sandusky, Ohio is in Wyandot County. Each office has an ATM onsite. The Forest and Upper Sandusky offices are in a middle-income CT and the Kenton office is in a moderate-income CT. Based on the market footprint of these facilities and the area they primarily serve, CFB delineates all of Hardin and Wyandot counties as its AA. This AA is contiguous and does not arbitrarily exclude any LMI geographies.

CFB's lending is typically centered in home mortgage and farms loans, but the volume of business loans originated was notably higher in 2020 and 2021. This trend reflects CFB's participation in the SBA's PPP, which was created to in response to the hardships caused by the COVID-19 pandemic. CFB originated 176 PPP loans totaling \$3.4 million, consisting of 127 loans (\$2.6 million) to businesses and 49 loans (\$0.9 million) to farms.

Additional information regarding demographic data, job market, housing cost, competition, and credit needs is presented and discussed below. This information provides further context for CFB's operations in the OH Non-MSA AA.

Ohio Non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Ohio Non-MSA (2020-2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	0.0	15.4	61.5	23.1	0.0
Population by Geography	54,203	0.0	14.8	64.3	20.9	0.0
Housing Units by Geography	23,002	0.0	15.9	63.8	20.3	0.0
Owner-Occupied Units by Geography	14,919	0.0	14.6	60.4	25.0	0.0
Occupied Rental Units by Geography	5,948	0.0	16.5	72.2	11.3	0.0
Vacant Units by Geography	2,135	0.0	23.2	64.4	12.5	0.0
Businesses by Geography	2,475	0.0	19.1	62.5	18.3	0.0
Farms by Geography	326	0.0	12.6	46.3	41.1	0.0
Family Distribution by Income Level	13,922	17.8	21.6	20.7	39.8	0.0
Household Distribution by Income Level	20,867	22.5	16.6	20.1	40.8	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$100,018
2021 FFIEC Updated Median Family Income Non-MSAs - OH		\$64,700	Median Gross Rent			\$631
			Families Below Poverty Level			10.8%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Ohio Non-MSA (2022)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	14.3	78.6	0.0	7.1
Population by Geography	52,596	0.0	16.0	80.6	0.0	3.4
Housing Units by Geography	23,187	0.0	17.8	81.5	0.0	0.7
Owner-Occupied Units by Geography	15,135	0.0	16.3	83.6	0.0	0.1
Occupied Rental Units by Geography	5,742	0.0	22.6	76.3	0.0	1.1
Vacant Units by Geography	2,310	0.0	16.4	80.1	0.0	3.5
Businesses by Geography	3,622	0.0	18.9	80.3	0.0	0.8
Farms by Geography	400	0.0	5.3	94.8	0.0	0.0
Family Distribution by Income Level	13,898	19.1	20.3	21.9	38.7	0.0
Household Distribution by Income Level	20,877	22.3	17.3	19.4	41.0	0.0
Median Family Income Non-MSAs – OH		\$66,684	Median Housing Value			\$116,874
2022 FFIEC Updated Median Family Income Non-MSAs – OH		\$74,900	Median Gross Rent			\$660
			Families Below Poverty Level			8.3%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Job Market

Business demographic data from the 2020 ACS census and 2022 D&B shows the primary industries in the AA are services (30 percent), retail trade (10 percent), and agriculture, forestry, and fishing (10 percent). In addition, a notable percentage of establishments are categorized as non-classifiable (22 percent). Some of the top employers are:

Major Employers	
Hardin County	Graphic Packaging International, Ohio Northern University, Hardin County Government, Ada Technologies, Inc, and Precision Strip, Inc.
Wyandot County	The Andersons, Dlubak Glass Company, Kasai North American, Kalmbach Feeds, Inc, and Walmart
<i>Source: Hardin County Chamber & Business Alliance and Wyandot County Economic Development</i>	

The average annual unemployment rate for both counties in the OH Non-MSA AA improved during the three-year evaluation period. The higher rates for 2020 reflect the impact of the COVID-19 pandemic. Unemployment rates spiked in April 2020 and then began to gradually improve through the end of 2021. During 2022, unemployment rates continued to improve and stabilize. Comparatively, Hardin County experiences a higher unemployment than Wyandot County. The following table summarizes these unemployment rates:

Average Annual Unemployment Rates			
	2020	2021	2022
State of Ohio	8.2	5.1	4.0
Hardin County	8.1	5.2	4.2
Wyandot County	7.0	3.5	2.9
<i>Source: Bureau of Labor Statistics; Rates Not Seasonally Adjusted</i>			

Housing Cost

A home mortgage loan may not be affordable for all LMI families in the AA. The demographic data in the table below shows the median housing value for the AA was at least three times the annual income of a low-income family and at least 1.9 times the annual income of a moderate-income family. Therefore, some LMI families may not be able to afford and maintain a home or qualify for a mortgage when also considering the down payment requirement, taxes and insurance, and other debt payments.

Housing Value vs Annual Income		
	2021	2022
Median Housing Value (MHV)	\$100,018	\$116,874
Median Family Income (MFI)	\$ 64,700	\$ 74,900
Low Income Level (<50% MFI)	\$ 32,350	\$ 37,450
Moderate-Income Level (<80% MFI)	\$ 51,760	\$ 59,920
<i>Source: 2015 and 2020 ACS Census; 2021 and 2022 Updated FFIEC MFI</i>		

Competition

Competition for deposits is strong given the number and size of the financial institutions with offices in the AA. As of June 30, 2022, FDIC deposit data shows CFB and nine other FDIC-insured banks have 20 offices in the AA. The top three banks, The First Citizens National Bank of Upper Sandusky, Liberty National Bank, and Premier Bank, hold 59.2 percent of the deposit market share. In comparison, CFB’s three offices in the AA have total deposits of \$59.9 million for a market share of 5 percent. This ranks CFB seventh in the group.

Competition for home mortgage, small business, and small farm loans is strong. Based on aggregate loan data, the top lenders in the AA captured a market share of 25-30 percent for home mortgages, 40-45 percent for small business loans, and 60-70 percent for small farm loans.

Aggregate Lending Data			
	# of Loans	# of Lenders	Top Three Lenders (Market Share)
Home Mortgage			
2021	1,456	144	Huntington National Bank (12.3), Union Home Mortgage (7.9), and Rocket Mortgage (7.8)
2022	1,045	132	Huntington National Bank (10.7), Premier Bank (8.6), and Superior Credit Union (6.6)
Small Business			
2021	475	42	US Bank (12.5), JPMorgan Chase (13.9), and Synchrony Bank (12.8)
2022	516	42	Synchrony Bank (17.3), US Bank (15.1), and JPMorgan Chase Bank (13.2)
Small Farm			
2021	82	15	Citizens National Bank (28.1), JPMorgan Chase Bank (15.6), Park National Bank (13.4), and John Deere Financial FSB (13.4)
2022	72	15	Citizens National Bank (25.0), John Deere Financial FSB (18.1), and JPMorgan Chase Bank (13.9)

Source: 2021 and 2022 Aggregate HMDA and CRA loan data

Community Contact

The OCC considered the comments of a contact from a private, nonprofit affordable housing organization that primarily serves Hancock, Hardin, Wyandot, and Putnam counties. The contact stated there is a significant need for affordable housing for LMI families. The contact noted affordable housing remains a substantial need among low-income families and is increasing among moderate- to middle-income families. As such, possible credit and community development opportunities to support this organization include:

- Low interest financing for future rehab projects,
- Business checking accounts with low/no fees and higher interest rates than currently offered,
- Federal Home Loan Bank sponsorship for grants,
- Mortgages for LMI clients,
- General operating support, and
- Grants for Individual Development Account (IDA) matching funds.

Scope of Evaluation in Ohio

The OCC performed a full-scope review of CFB's only AA, the OH Non-MSA. Refer to the table in Appendix A: Scope of Examination for additional information.

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 OH Non-MSA AA is reasonable. CFB's borrower distribution is excellent, but its geographic distribution is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits a reasonable geographic distribution of loans in the State. Although CFB's geographic distribution of home mortgage loans is poor, its geographic distribution of small loans to business and farms is reasonable. The AA did not have any low-income geographies and only two moderate-income geographies during the evaluation period.

Home Mortgage Loans

CFB's geographic distribution of home mortgage loans is poor. There were no home mortgage loans originated or purchased in moderate-income geographies during the three-year evaluation period.

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.

Small Loans to Businesses

CFB's geographic distribution of small loans to businesses is reasonable based on the following results:

- In 2020 and 2021, the bank's percentage of small loans to businesses in moderate-income CTs was below the percentage of businesses but was near to the aggregate percentage for all reporting lenders.
- In 2022, CFB did not originate a sufficient volume of small loans to conduct a meaningful analysis.
- In total, the OCC analyzed 52 small loans to businesses originated during the evaluation period. This sample included four loans or 7.7 percent that were in a moderate-income geography.

The OCC considered business loans are not a primary product for CFB aside from the notable volume of PPP loans originated in 2020 and 2021.

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.

Small Loans to Farms

CFB's geographic distribution of small loans to farms in the AA is reasonable based on the following results:

- In 2020-2021, CFB's percentage of small loans to farms in moderate-income geographies was below the percentage of farms and the aggregate percentage of all reporting lenders.
- In 2022, CFB did not make any loans to farms in moderate-income geographies. However, this performance is reasonable given CFB's low loan volume and the aggregate lending in these geographies. CFB originated 14 loans in the AA. In comparison, aggregate lenders originated a total of 71 loans with only one of these in a moderate-income geography.
- In total, the OCC analyzed a sample of 57 small loans to farms loans originated during the evaluation period. This sample included two loans or 3.5 percent made to farms in a moderate-income geography.

The OCC considered CFB's lending opportunities in moderate-income geographies are limited by the low number of farms and the strong competition in these geographies. Demographic data indicates there

were only 41 farms in the two moderate-income geographies (CTs #5 and #6) in 2020-2021 and 21 farms in the two moderate-income geographies (CTs #2 and #6) in 2022. These CTs are in Hardin County where CFB faces strong competition from AgCredit and 13 reporting lenders. During the evaluation period, aggregate lenders originated a total of 132 loans in Hardin County. The top two lenders originated 86 loans or 65.2 percent of the total.

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.

Lending Gap Analysis

The OCC did not identify any unexplained, conspicuous gaps in FNB's geographic distribution of home mortgage and small business loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. Although CFB's borrower distribution of home mortgage loans is reasonable, its borrower distribution of small loans to businesses and farms is excellent. The OCC also considered the impact of housing costs relative to median family income, percentage of families below poverty, competition, pandemic environment, and rising interest rates.

Home Mortgage Loans

CFB's overall distribution of home mortgage loans in its AA is reasonable based on the following results:

- In 2020-2021, CFB's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and aggregate percentage of all reporting lenders. CFB's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and aggregate percentage of all reporting lenders.
- In 2022, CFB's percentage of home loans to low-income borrowers was comparable to the percentage of low-income families and exceeded the aggregate percentage of all reporting lenders. CFB's percentage of home loans to moderate-income borrowers was below the percentage of moderate-income families and aggregate percentage of all reporting lenders.
- In total, the OCC analyzed a sample of 54 home mortgage loans originated during the evaluation period. This sample included five loans or 9.3 percent to low-income borrowers and 11 loans or 20.3 percent to moderate-income borrowers.

The OCC considered CFB does not offer any government-backed home loans from the Fair Housing Administration (FHA), Veterans Affairs (VA), or United State Department of Agriculture (USDA). In addition, CFB does not offer a first-time homebuyer program such as the Welcome Home Grant Program from the Federal Home Loan Bank. These programs are generally more common among LMI families due to the lower down payment requirement. According to 2020-2022 aggregate data, approximately 35 percent of originated loans among LMI families were government-backed.

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.

Small Loans to Businesses

CFB's distribution of small loans to businesses in the AA is excellent based on the following results:

- In 2020-2021, CFB's percentage of small loans to businesses with revenues less than \$1 million exceeded the percentage of such businesses and the aggregate percentage of all reporting lenders.
- In 2022, CFB did not originate a sufficient volume of small loans to businesses to conduct a meaningful analysis.
- In total, the OCC analyzed a sample of 52 small loans to businesses originated during the evaluation period. This sample included 50 loans or 96.2 percent made to businesses with revenues less than \$1 million.

The OCC considered the bank's business lending primarily consisted of PPP loans. In 2020-2021, the bank originated 165 small loans to businesses. Of these, 127 loans or nearly 77 percent were PPP loans.

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.

Small Loans to Farms

CFB's distribution of small loans to farms in the AA is excellent based on the following results:

- In 2020-2021 and 2022, CFB's percentage of small loans to farms with revenues less than \$1 million exceeded the percentage of such farms and the aggregate percentage for all reporting lenders.
- In total, the OCC analyzed a sample of 57 small loans to farms loans originated during the evaluation period. All 57 loans or 100 percent were made to farms with revenues less than \$1 million.

The OCC considered the bank's farm lending included a notable volume of PPP loans. In 2020-2021, the bank originated 75 small loans to farms. Of these, 49 loans or approximately 65 percent were PPP loans.

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.

Responses to Complaints

CFB did not receive any complaints regarding its CRA performance during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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:	01/01/2020 to 12/31/2022	
Bank Products Reviewed:	Home mortgage, small loans to businesses, and small loans to farms	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
Ohio Non-MSA AA	Full Scope	All of Hardin and Wyandot Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS: Community First Bank, N.A.	
Overall Bank:	Lending Test Rating
Community First Bank, N.A.	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																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
OH Non-MSA	33	3,729	0.0	1,456	0.0	0.0	0.0	14.6	0.0	12.5	60.4	54.5	67.6	25.0	45.5	19.9	0.0	0.0	0.0
Total	33	3,729	0.0	1,456	0.0	0.0	0.0	14.6	0.0	12.5	60.4	54.5	67.6	25.0	45.5	19.9	0.0	0.0	0.0

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
OH Non-MSA	21	3,585	100.0	1,045	0.0	0.0	0.0	16.3	0.00	16.6	83.6	100.0	83.2	0.0	0.0	0.0	0.1	0.0	0.3
Total	21	3,585	100.0	1,045	0.0	0.0	0.0	16.3	0.00	16.6	83.6	100.0	83.2	0.0	0.0	0.0	0.1	0.0	0.3

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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																				2020-21
Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
OH Non-MSA	33	3,729	100.0	1,456	17.8	3.0	6.9	21.6	24.2	20.9	20.7	27.3	24.2	39.8	45.5	32.6	0.0	0.0	15.5	
Total	33	3,729	100.0	1,456	17.8	3.0	6.9	21.6	24.2	20.9	20.7	27.3	24.2	39.8	45.5	32.6	0.0	0.0	15.5	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 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																				2022
Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
OH Non-MSA	21	3,585	100.0	1,045	19.1	19.0	9.6	20.3	14.3	26.8	21.9	14.3	24.6	38.7	52.4	25.6	0.0	0.0	13.5	
Total	21	3,585	100.0	1,045	19.1	19.0	9.6	20.3	14.3	26.8	21.9	14.3	24.6	38.7	52.4	25.6	0.0	0.0	13.5	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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																			2020-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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 - M	52	1,411	100.0	471	0.0	0.0	0.0	19.1	7.7	9.1	62.5	59.6	61.6	18.3	32.7	29.3	0.0	0.0	0.0
Total	52	1,411	100.0	471	0.0	0.0	0.0	19.1	7.7	9.1	62.5	59.6	61.6	18.3	32.7	29.3	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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												2020-21
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	52	1,389	100.0	471	77.8	96.2	55.4	4.9	3.8	17.3	0.0	
Total	52	1,389	100.0	471	77.8	96.2	55.4	4.9	3.8	17.3	0.0	

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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																			2020-21
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	43	2,962	100.0	82	0.0	0.0	0.0	12.6	4.7	23.2	46.3	9.3	52.4	41.1	86.0	24.4	0.0	0.0	0.0
Total	43	2,962	100.0	82	0.0	0.0	0.0	12.6	4.7	23.2	46.3	9.3	52.4	41.1	86.0	24.4	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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																			2022
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	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	14	2,732	100.0	71	0.0	0.0	0.0	5.3	0.0	1.4	94.8	100.0	98.6	0.0	0.0	0.0	0.0	0.0	0.0
Total	14	2,732	100.0	71	0.0	0.0	0.0	5.3	0.0	1.4	94.8	100.0	98.6	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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											2020-21
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	43	2,962	100.0	82	96.9	100.0	52.4	1.5	0.0	1.5	0.0
Total	43	2,962	100.0	82	96.9	100.0	52.4	1.5	0.0	1.5	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
OH Non-MSA	14	2,732	19.7	71	97.5	100.0	52.1	1.3	0.0	1.3	0.0
Total	14	2,732	19.7	71	97.5	100.0	52.1	1.3	0.0	1.3	0.0

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