



PUBLIC DISCLOSURE

June 12, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Citizens National Bank of Bluffton
Charter Number 11573

102 South Main Street
Bluffton, Ohio 45817

Office of the Comptroller of the Currency

Westlake Center
4555 Lake Forest Drive, Suite 520
Cincinnati, Ohio 45242-3760

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

Table of Contents

OVERALL CRA RATING	3
DEFINITIONS AND COMMON ABBREVIATIONS	4
DESCRIPTION OF INSTITUTION	8
SCOPE OF THE EVALUATION.....	9
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	11
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	12
LENDING TEST	12
COMMUNITY DEVELOPMENT TEST.....	23
APPENDIX A: SCOPE OF EXAMINATION.....	A-1
APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....	B-1

Overall CRA Rating: This institution is rated **Satisfactory**.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

- The Citizens National Bank of Bluffton (CNB or the bank) makes a majority of their loans inside the assessment areas (AAs).
- CNB's loan-to-deposit (LTD) ratio is more than reasonable.
- CNB's lending to borrowers of different income levels and businesses and farms of different sizes reflects an overall reasonable penetration.
- Overall, geographic distribution of lending reflects reasonable dispersion in the low- and moderate-income census tracts (CTs).
- Responsiveness to community development (CD) needs through CD lending, investments, and services is adequate.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and re-financings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

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

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area includes the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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 One 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.

Description of Institution

CNB is a \$784 million independent, intrastate community bank, which is wholly owned by Citizens Bancshares, Inc., a one-bank holding company. Both the main office and holding company are located in Bluffton, Ohio, approximately 85 miles northwest of Columbus, Ohio. The bank has ten banking offices, with eight full service offices and two independent drive-thru facilities. The bank has offices in Bluffton, Lima, Elida, Van Wert, Celina, Findlay, Defiance, and Springfield. The bank operates seven automatic teller machines (ATM) at the offices. The only office location without a drive-thru or ATM is the Springfield branch. In January 2014, the bank opened a Loan Production Office in Toledo, Ohio in a middle-income geography. The bank's Lima branch and independent drive-thru facility are located in a low-income CT, the Defiance and Springfield branches are located in moderate-income CTs, and the rest of the offices are located in middle- or upper-income CTs.

CNB's primary business focus is retail/commercial/agricultural banking. The bank offers a variety of standard lending and deposit products and services through their full service banking offices to accommodate their customers throughout their AAs. CNB also offers savings accounts and certificates of deposit (CD) to depositors across the country through cnbbankdirect.com. As of March 31, 2017, the bank had internet savings accounts totaling \$4.3 million and CDs totaling \$606,476. Loan products are not offered through this internet site.

As of March 31, 2017, CNB reported Tier 1 capital of \$74 million or nine percent of total assets. CNB's loan portfolio totaled approximately \$613 million at the same time period, with net loans representing about 78 percent of total assets. During the lending evaluation period, the bank sold approximately \$156 million in residential real estate loans to the secondary market. Table 1 reflects the bank's total loans originated/purchased between January 1, 2014 and December 31, 2016, with home, business, and farm loans as their primary products.

	% by Dollars of Loans Originated/Purchased during evaluation period	% by Number of Loans Originated/Purchased during evaluation period
Loan Type	%	%
Home Loans	21.51%	35.96%
Business Loans	49.33%	24.72%
Farm Loans	26.51%	24.14%
Consumer Loans	2.65%	15.18%
Total	100.00%	100.00%

Source: Bank's record of loans originated during 2014, 2015, and 2016.

CNB has designated three AAs. The AAs meet the requirements of the Community Reinvestment Act and do not arbitrarily exclude low- or moderate-income geographies. The AAs are as follows:

- Lima, OH MSA #30620 (Lima MSA AA) – Allen County, Ohio.
- Non-MSA AA – Defiance, Hancock, Mercer, Paulding, Putnam, and Van Wert Counties, and census tracts 401 and 402 in Auglaize County.
- Springfield, OH MSA #44220 (Springfield MSA AA) – Clark County, Ohio.

Competition remains strong in all AAs. The AAs include many local community banks, savings and loan associations, and branches of larger financial institutions. According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2016, CNB ranks second among 11 financial institutions in the Lima MSA AA, with a 16.05 percent deposit market share. For the Non-MSA AA, CNB ranks 12th among 32 financial institutions in this AA, with a 2.93 percent deposit market share. For the Springfield MSA AA, out of 12 financial institutions operating a total of 37 offices within the AA, CNB ranks ninth with 1.19 percent deposit market share.

There are no legal or economic impediments that affect CNB's ability to help meet the credit needs of its AAs. CNB's CRA rating as of March 24, 2014 was Satisfactory.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We conducted a full-scope CRA evaluation to assess the bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas. We used intermediate small bank CRA evaluation procedures to assess the bank's performance under the Lending Test and CD Test. The Lending Test includes loans originated from January 1, 2014 through December 31, 2016 (lending evaluation period), excluding CD loans. Residential real estate, small business, and small farm loans are the bank's primary lending products and were evaluated during the Lending Test. We used the 2010 U.S. Census data to analyze performance for the Lending Test. The CD Test considered CD loans, investments, and services from March 24, 2014, to June 12, 2017 (CD evaluation period).

Data Integrity

The bank's primary products include residential real estate, small business, and small farm loans. We reviewed home purchase, home improvement, and refinance loans reported under the Home Mortgage Disclosure Act (HMDA) and small business and small farm loans reported under CRA data. Based on data integrity examinations in 2017, we found the HMDA and CRA data was accurate and reliable and was used in its entirety in this evaluation.

Selection of Areas for Full-Scope Review

CNB has designated three AAs as its primary lending areas. We completed full-scope reviews of the Lima MSA AA and Non-MSA AA and a limited-scope review for the Springfield MSA AA.

Ratings

The bank's overall rating is based on the review of all three AAs. Sixty-one percent of the total home mortgage, small business, and small farm loans were originated in the Non-MSA AA, with almost 38 percent of the originations in the Lima MSA AA. We placed more weight on these two AAs during this evaluation.

Because the Bank originates less than two percent of the total loans originated during the lending evaluation period in the Springfield MSA AA, its 1.19 percent deposit market share, and strong competition, we placed less emphasis on the Springfield MSA AA in this evaluation.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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.

Conclusions with Respect to Performance Tests

LENDING TEST

CNB's performance under the lending test is rated "satisfactory."

Loan-to-Deposit Ratio

CNB's LTD ratio is more than reasonable given their size, financial condition, and AA credit needs. The bank's 13-quarter average LTD ratio of 110.89 percent is more than reasonable when compared to other similarly situated banks and thrifts with an average LTD of 74.59 percent. CNB's average LTD ratio was the second highest out of 18 similarly situated banks, with the competitors ranging from 50.38 percent to 113.04 percent. CNB's highest quarterly average LTD ratio was 116.69 percent as of September 30, 2016, and their lowest quarterly average ratio was 102.85 percent as of March 31, 2014.

Lending in Assessment Area

CNB's record of lending within its AAs is satisfactory with a majority of the bank's lending inside the AAs. Table 2 details CNB's lending activity during the lending evaluation period by number and dollar volume. Table 2 demonstrates that the bank makes a majority of its loans inside the AAs, with 76 percent of the number of loans originated inside the AAs.

Table 2 - Lending in the AAs										
Loan Type	Number of Loans					Dollars of Loans (in 000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	664	68.24	309	31.76	973	80,800	66.23	41,190	33.77	121,990
Home Refinance	540	79.88	136	20.12	676	66,028	72.38	25,195	27.62	91,223
Home Improvement	169	88.48	22	11.52	191	8,550	79.43	2,214	20.57	10,764
Small Business Loans	765	78.14	214	21.86	979	156,445	70.85	64,361	29.15	220,806
Small Farm Loans	833	77.34	244	22.66	1,077	110,312	71.50	43,978	28.50	154,290
Totals	2,971	76.26	925	23.74	3,896	422,135	70.46	176,938	29.54	599,073

Source: HMDA loans originated from January 1, 2014 through December 31, 2016, and CRA small business and farm loans originated from January 1, 2014 through December 31, 2016.

Lending to Borrowers of Different Incomes and to Businesses and Farms of Different Sizes

CNB's lending to borrowers of different income levels and businesses and farms of different sizes reflects an overall reasonable penetration and supports satisfactory performance.

The performance in the Springfield MSA AA reflects poor penetration. With one branch and approximately 11 percent of the families living below poverty, lending opportunities to low- and moderate-income individuals are limited in the Springfield MSA AA. CNB's lending to businesses and farms of different sizes in the Springfield MSA AA reflects poor penetration. During the lending evaluation period, CNB originated approximately 20 small business and 17 small farm loans in the Springfield MSA AA. There is strong competition in this AA and CNB's limited presence with one branch in this market limits their opportunities.

Conclusions for full-scope AAs

Lima MSA AA

For the Lima MSA AA, the distribution of residential real estate loans reflects reasonable penetration among individuals of different incomes, including low- and moderate-income borrowers. In addition, the penetration of lending to small farms of different sizes is overall reasonable. The penetration of lending to small businesses is lower than the level of loans made by AA businesses, and reflects poor penetration.

The distribution of residential real estate loans to moderate-income borrowers exceeds the percentage of moderate-income AA families for home purchase and home improvement loans, and is near to the ratio for home refinance loans. This reflects excellent penetration to moderate-income families. The distribution of residential real estate loans to low-income borrowers is significantly lower than the level of low-income AA families, representing poor distribution. However, the overall 12.04 percent poverty level of families within the AA contributes to the lower penetration of lending to low-income borrowers as it reflects difficulty they may have meeting the credit underwriting standards for home loan products. Table 3 shows the distribution of home loan products among borrowers of different income levels as compared to the percentage of AA families in each income category, and demonstrates an overall reasonable distribution. CNB was ranked overall second out of 174 lenders in the AA in the total number of loans and total dollar amount of loans made by the bank, based on 2015 peer mortgage loan data.

Table 3 – Borrower Distribution of Residential Real Estate Loans in the Lima MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	21.47%	5.96%	17.45%	24.50%	22.40%	29.14%	38.68%	40.40%
Home Refinance		8.56%		13.96%		34.23%		43.25%
Home Improvement		6.49%		22.08%		24.68%		46.75%

Source: HMDA loans originated from January 1, 2014 through December 31, 2016; 2010 U.S. Census data, updated as of 2016. The above numbers are as a percentage of loans with borrower income information available, and the data shown only includes one-to-four family and manufactured housing loans.

The overall penetration of loans to small businesses with gross revenues of \$1 million or less is significantly lower than the level of loans made by AA businesses, and is considered overall poor. Refer to Table 4 for more details on the borrower distribution of loans to small businesses.

Table 4 – Borrower Distribution of Loans to Businesses in the Lima MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	76.39%	7.15%	16.46%	100%
% of Bank Loans in AA by #	40.70%	59.30%	0.00%	100%
% of Bank Loans in AA by \$	22.89%	77.11%	0.00%	100%

Source: CRA small business loans originated in 2014, 2015, and 2016; Dun and Bradstreet data as of June 2016; 2010 U.S. Census data.

The overall penetration of loans to small farms with gross revenues of \$1 million or less is lower than the level of loans made by AA farms, but is considered reasonable. Refer to Table 5 for more details on the borrower distribution of loans to small farms.

Table 5 – Borrower Distribution of Loans to Farms in the Lima MSA AA				
Farm Revenues	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Farms	98.02%	1.70%	0.28%	100%
% of Bank Loans in AA by #	79.62%	20.38%	0.00%	100%
% of Bank Loans in AA by \$	71.69%	28.31%	0.00%	100%

Source: CRA small farm loans originated in 2014, 2015, and 2016; Dun and Bradstreet data as of June 2016; 2010 U.S. Census data.

Non-MSA AA

For the Non-MSA AA, the distribution of residential real estate loans reflects reasonable penetration among individuals of different incomes, including low- and moderate-income borrowers. In addition, the penetration of loans to small businesses and farms of different sizes is overall reasonable.

The distribution of residential real estate loans to moderate-income borrowers exceeds the percentage of moderate-income AA families for home purchase and home improvement loans, and is near to the ratio for home refinance loans. This reflects excellent penetration to moderate-income families. The distribution of residential real estate loans to low-income borrowers is lower than the level of low-income AA families, representing poor distribution. However, the overall 7.85 percent poverty level of families within the AA contributes to the lower penetration of lending to low-income borrowers as it reflects difficulty they may have meeting the credit underwriting standards for home loan products. Table 6 shows the distribution of home loan products among borrowers of different income levels as compared to the percentage of AA families in each income category, and demonstrates an overall reasonable distribution. CNB was ranked overall sixth out of 242 lenders in the AA in the total number of loans and total dollar amount of loans made by the bank, based on 2015 peer mortgage loan data.

Table 6 – Borrower Distribution of Residential Real Estate Loans in the Non-MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	14.44%	6.03%	16.88%	29.52%	22.96%	20.95%	45.72%	43.50%
Home Refinance		5.51%		15.81%		22.06%		56.62%
Home Improvement		3.45%		21.84%		22.99%		51.72%

Source: HMDA loans originated from January 1, 2014 through December 31, 2016; 2010 U.S. Census data, updated as of 2016. The above numbers are as a percentage of loans with borrower income information available, and the data shown only includes one-to-four family and manufactured housing loans.

The penetration of loans to small businesses is reasonable in the Non-MSA AA. CNB originated 64 percent of their number of loans to businesses with gross revenues of \$1 million or less, which is comparable to the 78 percent by AA businesses with gross revenues of \$1 million or less. Refer to Table 7 for more details on the borrower distribution of loans to small businesses.

Table 7 – Borrower Distribution of Loans to Businesses in the Non-MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	78.14%	6.95%	14.91%	100%
% of Bank Loans in AA by #	64.47%	35.53%	0.00%	100%
% of Bank Loans in AA by \$	40.51%	59.49%	0.00%	100%

Source: CRA small business loans originated in 2014, 2015, and 2016; Dun and Bradstreet data as of June 2016; 2010 U.S. Census data.

The penetration of loans to small farms is reasonable in the Non-MSA AA. For small farm lending, CNB originated 95 percent of their number of loans to small farms with gross revenues of \$1 million or less, which compares reasonably with the 99 percent of AA business with gross revenues of \$1 million or less. Refer to Table 8 for more details on the borrower distribution of loans to small farms.

Table 8 – Borrower Distribution of Loans to Farms in the Non-MSA AA				
Farm Revenues	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Farms	98.82%	0.82%	0.36%	100%
% of Bank Loans in AA by #	94.78%	5.22%	0.00%	100%
% of Bank Loans in AA by \$	92.28%	7.72%	0.00%	100%

Source: CRA small farm loans originated in 2014, 2015, and 2016; Dun and Bradstreet data as of June 2016; 2010 U.S. Census data.

Conclusion for limited-scope AA

Springfield MSA AA

For the Springfield MSA AA, the distribution of residential real estate, small business, and small farm loans reflects an overall poor penetration among individuals and businesses/farms of different incomes/sizes.

The penetration of residential real estate loans to low- and moderate-income borrowers is poor, and does not meet the standards for satisfactory performance. CNB did not originate any loans to low-income borrowers in the Springfield MSA AA during the lending evaluation period. The bank's level of lending to moderate-income borrowers is significantly lower than the percentage of moderate-income families in the AA. During the lending evaluation period, CNB originated six residential real estate loans in the Springfield MSA AA, and only one was to a moderate-income borrower. The overall 11.05 percent poverty level of families within the AA contributes to the lower penetration of lending to low-income borrowers as it reflects difficulty they may have meeting the credit underwriting standards for home loan products. However, the bank's penetration is considered poor. Refer to Table 9 for the borrower distribution of home loans in the Springfield MSA AA.

Table 9 – Borrower Distribution of Residential Real Estate Loans in the Springfield MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	19.82%	0.00%	17.52%	0.00%	22.90%	50.00%	39.76%	50.00%
Home Refinance		0.00%		25.00%		0.00%		75.00%
Home Improvement		0.00%		0.00%		0.00%		0.00%

Source: HMDA loans originated from January 1, 2014 through December 31, 2016; 2010 U.S. Census data, updated as of 2016. The above numbers are as a percentage of loans with borrower income information available, and the data shown only includes one-to-four family and manufactured housing loans.

The penetration of loans to small businesses is poor in the Springfield MSA AA. CNB originated 55 percent of their number of loans to businesses with gross revenues of \$1 million or less, which is significantly lower than the 78 percent by AA businesses with gross revenues of \$1 million or less. Refer to Table 10 for more details on the borrower distribution of loans to small businesses.

Table 10 – Borrower Distribution of Loans to Businesses in the Springfield MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	78.21%	6.52%	15.27%	100%
% of Bank Loans in AA by #	55.00%	45.00%	0.00%	100%
% of Bank Loans in AA by \$	32.48%	67.52%	0.00%	100%

Source: CRA small business loans originated in 2014, 2015, and 2016; Dun and Bradstreet data as of June 2016; 2010 U.S. Census data.

The penetration of loans to small farms is poor in the Springfield MSA AA. For small farm lending, CNB originated 35 percent of their number of loans to small farms with gross revenues of \$1 million or less, which is poor when compared to the 98 percent of AA businesses with gross revenues of \$1 million or less. Refer to Table 11 for more details on the borrower distribution of loans to small farms.

Table 11 – Borrower Distribution of Loans to Farms in the Springfield MSA AA				
Farm Revenues	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Farms	97.89%	1.51%	0.60%	100%
% of Bank Loans in AA by #	35.29%	64.71%	0.00%	100%
% of Bank Loans in AA by \$	17.23%	82.77%	0.00%	100%

Source: CRA small farm loans originated in 2014, 2015, and 2016; Dun and Bradstreet data as of June 2016; 2010 U.S. Census data.

Geographic Distribution of Loans

Overall, geographic distribution of lending reflects reasonable dispersion in the low- and moderate-income CTs and meets the standards for satisfactory performance. Sixty-one percent of the total home mortgage, small business, and small farm loans were originated in the Non-MSA AA, with almost 38 percent of the originations in the Lima MSA AA. The Springfield MSA AA accounts for a very minimal level of the bank's overall lending and a 1.19 percent deposit market share in the AA. With this information, combined with only one branch in the Springfield MSA AA and strong competition, we placed the least amount of weight on the Springfield MSA AA and completed a limited-scope review.

Conclusions for full-scope AAs

Lima MSA AA

CNB's geographic distribution of lending in the Lima MSA AA for residential real estate lending reflects poor dispersion. Geographic distribution of lending in low- and moderate-income CTs for small business and small farm lending reflects reasonable dispersion. Lending was reflected in the majority of the AA.

CNB's geographic distribution of home loans is significantly lower than the percentage of AA owner occupied housing for low- and moderate-income CTs and is considered poor. The bank originated approximately 14 home loans in low- income CTs and 34 home loans in moderate-income CTs during the three-year lending evaluation period. A factor contributing to the lower penetration in low- and moderate-income geographies is that 26 percent of the total housing units in the AA are rental occupied units. Competition for loans in this AA is strong. CNB is one of the top originators of mortgage loans in the AA as of the 2015 peer mortgage data. Refer to Table 12 for specific details on the bank's geographic distribution of home loans.

Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	5.60%	2.16%	10.43%	5.86%	51.30%	42.59%	32.67%	49.39%
Home Refinance		1.61%		4.84%		49.60%		43.95%
Home Improvement		1.27%		2.53%		51.90%		44.30%

Source: HMDA loans originated from January 1, 2014 to December 31, 2016; 2010 U.S. Census data.

The geographic distribution of business loans in the Lima MSA AA reflects overall reasonable dispersion. The bank originated more business loans in low-income CTs when compared to the percentage of AA businesses in these areas. The bank originated a number of business loans in moderate-income geographies that is less than the demographic data for these areas, but is overall considered reasonable. A majority of the low- and moderate-income CTs are near the city of Lima. Refer to Table 13 for details on the geographic distribution of business loans in the Lima MSA AA.

Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	15.32%	16.58%	11.27%	7.54%	47.92%	37.69%	25.49%	38.19%

Source: CRA small business loans from January 1, 2014 to December 31, 2016; Dun and Bradstreet data, 2016.

CNB's geographic distribution of farm loans is lower than the percentage of farms in low- and moderate-income geographies, but is considered overall reasonable. According to Dun and Bradstreet data as of 2016, there were seven farms in low-income geographies and six farms in moderate-income geographies. The bank did not originate any farm loans in the low-income CTs and originated two loans in moderate-income CTs. Given there are only 13 farms in the low- and moderate-income geographies and the majority of these areas are near the city of Lima, lending to farms in low- and moderate-income CTs is considered reasonable. Refer to Table 14 for details on the geographic distribution of farm loans in the Lima MSA AA.

Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans
Farm Loans	1.98%	0.00%	1.70%	0.77%	77.05%	84.62%	19.27%	14.61%

Source: CRA small farm loans from January 1, 2014 to December 31, 2016; Dun and Bradstreet data, 2016.

Non-MSA AA

CNB's geographic distribution of lending in the Non-MSA AA for residential real estate, small business, and small farm lending reflects reasonable dispersion. There are no low-income geographies in the Non-MSA AA. Lending was reflected in the majority of the AA.

CNB's geographic distribution of home loans is near to the percentage of AA owner occupied housing for moderate-income CTs and reflects reasonable dispersion. There are no low-income geographies in this AA. Refer to Table 15 for specific details on the bank's geographic distribution of home loans.

Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	0.00%	0.00%	6.17%	5.97%	53.82%	63.28%	40.01%	30.75%
Home Refinance		0.00%		4.95%		57.60%		37.45%
Home Improvement		0.00%		5.56%		64.44%		30.00%

Source: HMDA loans originated from January 1, 2014 to December 31, 2016; 2010 U.S. Census data.

The geographic distribution of business loans in the Non-MSA AA reflects excellent dispersion. The bank originated more business loans in moderate-income CTs when compared to the percentage of AA businesses in these areas. Refer to Table 16 for details on the geographic distribution of business loans in the Non-MSA AA.

Table 16 - Geographic Distribution of Loans to Businesses in the Non-MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	0.00%	0.00%	10.54%	15.02%	51.81%	49.27%	37.65%	35.71%

Source: CRA small business loans from January 1, 2014 to December 31, 2016; Dun and Bradstreet data, 2016.

CNB's geographic distribution of farm loans is lower than the percentage of farms in moderate-income geographies, but is overall reasonable. According to Dun and Bradstreet data as of 2016, there were 27 farms in moderate-income geographies. The bank originated approximately two loans in moderate-income CTs during the lending evaluation period. Given there are only 27 farms in the moderate-income geographies and competition is strong, lending to farms in moderate-income CTs is considered reasonable. Refer to Table 17 for details on the geographic distribution of farm loans in the Non-MSA AA.

Table 17 - Geographic Distribution of Loans to Farms in the Non-MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans
Farm Loans	0.00%	0.00%	1.38%	0.36%	54.71%	45.32%	43.91%	54.32%

Source: CRA small farm loans from January 1, 2014 to December 31, 2016; Dun and Bradstreet data, 2016.

Conclusion for limited-scope AA

Springfield MSA AA

CNB's geographic distribution of lending in the low- and moderate-income geographies in the Springfield MSA AA for residential real estate and small farm lending reflects poor dispersion. The bank's geographic distribution of lending in low- and moderate-income CTs for business loans reflects excellent dispersion.

CNB originated six home loans during the three-year lending evaluation period. Of those six loans, one was originated in a moderate-income CT and no loans were originated in low-income CTs. Lending in the Springfield MSA AA represented approximately one percent of the bank's lending activity during the lending evaluation period. In addition, the bank has only one branch in this AA, with a total deposit market share of 1.19 percent. We placed less weight on the Springfield MSA AA during this evaluation period based on these facts. The bank's lending in moderate-income geographies is significantly lower than the percentage of AA owner occupied housing in

these geographies and considered poor. Refer to Table 18 for specific details on the bank's geographic distribution of home loans.

Table 18 - Geographic Distribution of Residential Real Estate Loans in the Springfield MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	4.94%	0.00%	12.97%	0.00%	44.52%	50.00%	37.57%	50.00%
Home Refinance		0.00%		25.00%		25.00%		
Home Improvement		0.00%		0.00%		0.00%		

Source: HMDA loans originated from January 1, 2014 to December 31, 2016; 2010 U.S. Census data.

The geographic distribution of business loans in the Springfield MSA AA reflects excellent dispersion. The bank originated more business loans in low- and moderate-income CTs when compared to the percentage of AA businesses in these areas. Refer to Table 19 for details on the geographic distribution of business loans in the Springfield MSA AA.

Table 19 - Geographic Distribution of Loans to Businesses in the Springfield MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	8.78%	10.00%	18.35%	30.00%	33.91%	10.00%	38.96%	50.00%

Source: CRA small business loans from January 1, 2014 to December 31, 2016; Dun and Bradstreet data, 2016.

The geographic distribution of farm loans in the Springfield MSA AA reflects poor dispersion, as the bank did not originate any farm loans in these areas during the lending evaluation period. In total, CNB originated 17 farm loans in this AA, with no loans originated in low- and moderate-income CTs. Refer to Table 20 for details on the geographic distribution of farm loans in the Springfield MSA AA.

Table 20 - Geographic Distribution of Loans to Farms in the Springfield MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans
Farm Loans	2.41%	0.00%	6.02%	0.00%	34.94%	17.65%	56.63%	82.35%

Source: CRA small farm loans from January 1, 2014 to December 31, 2016; Dun and Bradstreet data, 2016.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

CNB's performance under the community development test is rated "Satisfactory." Responsiveness to CD needs through CD lending, investments, and services is adequate.

Number and Amount of Community Development Loans

The number and amount of qualified CD loans represents adequate responsiveness.

Conclusions for full-scope AAs

Lima MSA AA

CD lending performance in the Lima MSA AA reflects adequate responsiveness. CNB originated eight qualifying loans totaling \$2.6 million. CNB granted a \$740,000 loan to purchase a new laser cutting machine for the sheet metal operation of a small industrial firm. The loan led to the creation of seven new jobs and positioned the firm for future growth. The facility is located in a moderate-income geography in Lima. CNB granted a line of credit for \$200,000 to a community service organization with a mission of providing financial, counseling and any other assistance needed to crime victims. The non-profit operates in a low-income geography in Lima. The line of credit's purpose was to help fund on-going operations.

Non-MSA AA

CD lending performance in the Non-MSA AA reflects excellent responsiveness. CNB originated two qualifying loans totaling \$1.5 million. The limited opportunities for CD loans in rural areas was considered in our conclusion. CNB originated both loans to community health centers.

Conclusion for limited-scope AA

Springfield MSA AA

CNB did not originate any CD loans in the Springfield MSA AA during the CD evaluation period.

Performance in the Broader Statewide or Regional Area

Because CNB's overall CD performance within its AAs was adequate, we also gave positive consideration to a \$1.85 million loan in Toledo, Ohio. The purpose was to

purchase and make improvements to an industrial facility in an area that is targeted for revitalization by the City's "Toledo Expansion Incentives" (TEI) program.

Number and Amount of Qualified Investments

The number, amount and quality of the qualified CD investments represents adequate responsiveness.

Conclusions for full-scope AAs

Lima MSA AA

The number and amount of qualified CD investments in the Lima MSA AA represent adequate responsiveness. During the CD evaluation period, CNB made 77 donations totaling \$59,000 to various CD organizations. The organizations included underprivileged youth centers, homeless shelters, and food banks.

Non-MSA AA

The number and amount of qualified investments in the Non-MSA AA represent adequate responsiveness. During the CD evaluation period, CNB made 81 donations totaling \$34,000 to a wide variety CD organizations. The organizations included underprivileged children's service providers, affordable housing organizations, homeless shelters, and food banks.

Conclusion for limited-scope AA

Springfield MSA AA

The number and amount of qualified investments in the Springfield MSA AA represent adequate responsiveness. During the CD evaluation period, CNB made 6 donations totaling \$2,000 to various CD organizations. The organizations included food banks and shelters for abused women. We considered CNB's relatively small presence in this AA in our conclusion. The bank made three donations totaling nearly \$300 to assist a local school district with a financial literacy program. The majority of students throughout the district are eligible for reduced-price or free lunches.

Performance in the Broader Statewide or Regional Area

Because CNB's overall CD performance within its AAs was adequate, we also gave positive consideration to management's purchase of a bond issued by the city of Steubenville, Ohio. The purpose of the bond is to demolish buildings in an urban area to enable redevelopment. This activity was done in conjunction with the city of Steubenville's 2013 Economic Development Plan.

Extent to Which the Bank Provides Community Development Services

The number, amount and quality of the qualified CD services represents adequate responsiveness.

Conclusions for full-scope AAs

Lima MSA AA

The provision of CD services in the Lima MSA AA represents excellent responsiveness. Bank employees serve as directors, committee members or officers of 14 different qualifying CD organizations. We note that a bank officer serves on the board of a local economic development organization and also serves as the chairman of a revolving loan fund that is an integral part of the organization's activities. The fund is used for loans to businesses that often would not qualify for traditional financing due to the business being a start-up or due to a lack of collateral. Another bank officer serves on the board and the finance committee of a community health facility focused on providing services to primarily low- and moderate-income individuals.

Non-MSA AA

The provision of CD services in the Non-MSA AA represents adequate responsiveness. CNB employees serve as either a director or committee member of 6 different qualifying CD organizations. Two of the organizations were local county economic development organizations. One organization was a non-profit charity that focuses on the needs of very poor residents.

Conclusion for limited-scope AA

Springfield MSA AA

The provision of CD services in the Springfield MSA AA represents adequate responsiveness. CNB employees serve as either a director or committee member of 3 different qualifying CD organizations. One organization's focus is providing critical consulting and business support services to small businesses and start-ups. A second organization was a non-profit community health organization.

Responsiveness to Community Development Needs

The bank's responsiveness to CD needs is adequate and reflects the need for community services and additional economic development.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/2014 to 12/31/2016 Investment and Service Tests and CD Loans: 03/24/2014 to 06/12/2017	
Financial Institution	Products Reviewed	
The Citizens National Bank of Bluffton (CNB) Bluffton, Ohio	Residential Real Estate, Small business, and Small Farm Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>[Instructions: Provide only if affiliate products are reviewed.]</i> None reviewed.		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Lima, OH MSA #30620	Full Scope	
Non-MSA AA (Ohio)	Full Scope	
Springfield, OH MSA #44220	Limited Scope	

Appendix B: Community Profiles for Full-Scope Areas

Lima MSA AA

Demographic Information for Full-Scope Area: Lima MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	33	15.15	18.18	48.49	18.18	0.00
Population by Geography	106,331	9.04	15.51	48.05	27.40	0.00
Owner-Occupied Housing by Geography	28,986	5.60	10.43	51.30	32.67	0.00
Businesses by Geography	5,705	15.32	11.27	47.92	25.49	0.00
Farms by Geography	353	1.98	1.70	77.05	19.27	0.00
Family Distribution by Income Level	27,769	21.47	17.45	22.40	38.68	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	10,806	16.57	18.73	47.70	17.00	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below the Poverty Level	= \$61,100 = 14.59%	Median Housing Value Unemployment Rate (Allen County, Ohio)				= \$101,789 = 4.5%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2016 FFIEC-updated MFI.

The Lima MSA AA includes all of Allen County, Ohio. CNB maintains five branches in this AA including the main office and a drive-thru facility in Bluffton, a branch and drive-thru facility in Lima, and a branch in Elida. The Lima branch office and drive-thru facility are located in a low-income CT. Elida and Bluffton offices are located in upper-income CTs. Lima is the county seat and the largest city in Allen County.

Competition in the AA is strong with many state and national banks, savings and loan associations, and branches of large banks. Since the previous evaluation, the local economic conditions of the AA continue to improve with the unemployment rate in Allen County only slightly higher than the state (4.4 percent) and national (4.1 percent) rates, according to the Bureau of Labor Market Information as of April 2017.

Allen County is supported by a diverse mix of companies across many industries, from manufacturing to the service industry. Primary employers in the county include Ford Motor Company, General Dynamics Corporation, St. Rita's Medical Center, Lima Memorial Health Systems, MetoKote Corporation, Procter & Gamble Company, and the Lima City Schools.

A community contact indicated that the AA's unemployment rates are in line with the state and national levels. The credit needs of the AA include affordable housing and small business lending. We contacted an affordable housing organization during the evaluation. According to the contact, local banks and thrifts are adequately meeting the credit and CD needs of the AA.

Non-MSA AA

Demographic Information for Full-Scope Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	54	0.00	9.26	57.41	33.33	0.00
Population by Geography	245,657	0.00	8.31	52.60	39.09	0.00
Owner-Occupied Housing by Geography	75,492	0.00	6.17	53.82	40.01	0.00
Businesses by Geography	12,974	0.00	10.54	51.81	37.65	0.00
Farms by Geography	1,954	0.00	1.38	54.71	43.91	0.00
Family Distribution by Income Level	68,433	14.44	16.88	22.96	45.72	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	21,439	0.00	12.92	56.95	30.13	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below the Poverty Level	= \$55,400 = 10.47%	Median Housing Value Unemployment Rate (Ohio)		= \$117,721 = 4.4%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2016 FFIEC updated MFI.

The Non-MSA AA includes the entire counties of Defiance, Hancock, Mercer, Paulding, Putnam, and Van Wert in Ohio, and CTs 401 and 402 in Auglaize County, Ohio. The Non-MSA AA adjoins the Lima MSA AA. CNB maintains four offices including drive-thru facilities within the Non-MSA AA, with one branch each in Van Wert, Mercer, Hancock, and Defiance counties. The Defiance branch is located in a moderate-income CT, and the other three offices are in middle- and upper-income CTs. Van Wert is the county seat of Van Wert County, Celina is the county seat of Mercer County, Findlay is county seat of Hancock County, and Defiance is the county seat of Defiance.

Competition in the AA is strong with many state and national banks, savings and loan associations, and branches of large banks. Since the previous evaluation, the local economic conditions of the AA are stable, with the unemployment rates in each county lower than the state (4.4 percent) and national (4.1 percent) levels, according to the Bureau of Labor Market Information as of April 2017. The unemployment rates for each county as of April 2017 were as follows: Auglaize County 3.3 percent, Hancock County

2.9 percent, Mercer County 2.5 percent, Paulding County 3.6 percent, Putnam County 3.0 percent, and Van Wert County 3.4 percent.

The counties in the Non-MSA AA are supported by a diverse mix of companies across many industries, including manufacturing, government, agriculture, and the service industry. Primary employers in Auglaize County include Grand Lake Health System, Crown Equipment Company, and The Dannon Company. Primary employers in Defiance County are General Motors Company, Johns Manville Corporation, and Defiance Metal Products Company. Primary employers in Hancock County include Findlay City Schools, Blanchard Valley Health System, Cooper Tire & Rubber Company, University of Findlay, Marathon Petroleum Company LLC, and Whirlpool Corporation. Primary employers in Mercer County include Celina City Schools and Celina Aluminum Precision Technology. Primary employers in Paulding County are Paulding Schools, Wayne Trace Local Schools, and Cooper Farms Inc. Primary employers in Putnam County are Wal-Mart Stores, Inc., Putnam County Government, and Mars Inc./Iams Company. Primary employers in Van Wert County include Van Wert City Schools, Eaton Corporation, Federal-Mogul Corporation, and the Van Wert County Hospital Association.

A community contact indicated that the AA's economy is stable, with low unemployment. The credit needs of the AA include small business lending, as well as other loans. We contacted a small business/economic development organization during the evaluation. According to the contact, local banks and thrifts are adequately meeting the credit and CD needs of the AA.