



PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Huntington National Bank

Charter Number 7745

17 South High Street
Columbus, OH 43216

Office of the Comptroller of the Currency

400 7th Street S.W.
Washington, DC 20119

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

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General Information and Overall CRA Rating

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Huntington National Bank (HNB or bank) issued by the OCC, the institution's supervisory agency, for the evaluation period starting January 1, 2012 and ending December 31, 2015. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

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

The following table indicates the performance level of The Huntington National Bank with respect to the Lending, Investment, and Service Tests:

Performance Levels	Huntington National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The bank's lending activity is good.
- The bank originates a majority of its loans inside its assessment area (AA).
- The bank's overall geographic distribution of loans is adequate. Home mortgage loan performance was adequate, with good small loans to businesses performance.
- The bank's overall borrower distribution is good, as evidenced by a good distribution of home mortgage loans by borrower income level and excellent distribution of small loans to businesses of different income levels.
- The bank's level of CD lending is exceptionally strong, and responsive to identified needs. CD lending had a significantly positive impact on lending performance in seven of the

bank's 10 rating areas.

- The bank has a significant level of qualified CD investments that are responsive to community needs.
- Overall bank branches are readily accessible to people and geographies of different incomes. The bank's record of opening or closing offices has generally not adversely impacted access to banking services to low-and moderate-income individuals and geographies. The bank is a leader in providing CD services.

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): Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

Community Development: 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 refinancing's, 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 derived from the United States Census Bureau's American Community Survey data every 5 years and used to determine the income level category of geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography, 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 (MD): 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 comprises 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

The Huntington National Bank (HNB) is an interstate bank headquartered in Columbus, Ohio. As of December 31, 2015, HNB had total assets of approximately \$70.9 billion and total deposits of approximately \$56.1 billion. The bank is a wholly owned subsidiary of Huntington Bancshares Incorporated (HBI). HBI is headquartered in Columbus and has total assets approximating \$71 billion.

As of December 31, 2015, HNB had Tier 1 Capital of \$5.7 billion. During the evaluation period, HNB realized a 14.6 percent increase in Tier 1 Capital. HNB's loan-to-deposit ratio was 90.5 percent and net loans represented 71.7 percent (\$50.8 billion) of total assets. By dollar amount, the loan portfolio consisted of the following types of credit: 28.3 percent (\$14.4 billion) commercial (including commercial real estate); 44.5 percent (\$22.6 billion) residential real estate; 20.1 percent (\$10.2 billion) consumer loans; 3.8 percent (\$1.9 billion) lease financing receivables; and 3.3 percent (\$1.6 billion) other loans.

HNB offers a range of consumer and commercial banking products and services within its assessment areas. These include full-service commercial, small business, consumer, and mortgage banking services, as well as automobile financing, equipment leasing, investment management, trust services, brokerage services, insurance programs, and other financial product and services. HNB offers agricultural loans based upon local needs, but they are not a focus. For purposes of CRA evaluation, HNB is an interstate bank operating 807 offices in Ohio, Michigan, Indiana, West Virginia, Pennsylvania, Kentucky, and Florida. Offices include geographies in both the Ohio and Kentucky portions of the Cincinnati, Ohio-Kentucky-Indiana Multi-state Metropolitan Statistical Area (MMSA), both the Ohio and Pennsylvania portions of the Youngstown-Warren-Boardman MMSA, both the Ohio and West Virginia portions of the Wheeling MMSA and both the Ohio and West Virginia portions of the Weirton-Steubenville MMSA. Refer to the "Multi-State Metropolitan Area and State Ratings" section of this evaluation for details on the locations of HNB's offices.

International banking services are available through the headquarters office in Columbus, Ohio, and a limited purpose office located in the Cayman Islands. HNB's foreign banking activities, in total or with any individual country, are not significant.

HNB has subsidiaries that include: asset advisors that provide investment management services; real estate management companies; asset securitization entities; a merchant card services operation; companies that provide and supplement the provisions of international trade activities; and a community development corporation. The Huntington Community Development Corporation (HCDC) is a subsidiary that focuses on community development initiatives. At the bank's request, we considered investments made by the HCDC during this evaluation as this affiliate increases HNB's capacity to invest in the community through qualified investments. Activities of the other subsidiaries were not requested to be considered in this evaluation.

Competition in the HNB's assessment areas (AAs) is strong. HNB competes with numerous local, regional and national banks as well as credit unions, mortgage companies, and non-bank financial service providers.

HNB has conducted several acquisitions during the evaluation period. In March 2012, Huntington Bancshares Incorporated (HBI) announced that it purchased Fidelity Bank from the Federal Deposit Insurance Corporation (FDIC). On March 2014, HBI completed its merger of Camco Financial Corp., parent company of Advantage Bank, based in Cambridge, Ohio. In September 2014, HNB completed its acquisition of 24 Bank of America branches in Michigan. HNB obtained approximately \$750 million in deposits as part of the acquisition. In March 2015, HBI completed its acquisition of Macquarie Equipment Finance, Inc. (MEF-US) from its parent company, Sydney, Australia-based Macquarie Group Ltd. MEF-US is the largest, standalone, independent provider of specialized technology financing in North America with approximately \$500 million of annual originations. On December 7, 2015, HBI sold Huntington Asset Advisors Inc. to Federated Investors Inc. On December 31, 2015, Huntington Bancshares Incorporated sold Huntington Asset Services, Inc. (HASI) and Unified Financial Securities CoInc. (Unified) to Ultimus Holdings LLC. HASI and Unified provide mutual fund service solutions and financial products and services in the United States.

HNB's merger and acquisition activity during the evaluation period resulted in the bank's growth in size and expansion of its footprint in a number of AAs. While financial operations overlapped in some markets, HNB's corporate activity during the evaluation period resulted in HNB entering the following new market areas: Michigan-Washtenaw County (Ann Arbor AA), Calhoun County (Battle Creek AA), Bay County (Bay City AA), Genesee County (Flint AA), Jackson County (Jackson AA), Kalamazo and Van Buren Counties (Kalamazoo AA), Clinton, Eaton, and Ingham Counties (Lansing AA), Saginaw County (Saginaw AA), Cass County (South Bend AA), Lapeer and Livingston, and Oakland Counties (Warren AA). In the Michigan Non-MSA HNB entered Alpena, Charlevoix, Branch, Gratiot, Wexford, Ostego, Shiawassee, St. Joseph, and Midland Counties. Ohio-Guernsey, and Washington Counties (Ohio Non-MSA).

There are no financial or legal factors impeding the bank's ability to help meet the credit needs in its communities. The bank received a Satisfactory rating in its most recent CRA evaluation dated January 1, 2012.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home mortgage refinance mortgage loans that HNB reported under the Home Mortgage Disclosure Act (HMDA). We also analyzed lending to small businesses and small farms reported under the Community Reinvestment Act (CRA). Our analysis period for this evaluation is January 1, 2012 through December 31, 2015. In our evaluation under the Lending Test, some AAs received separate analyses of 2012 through 2013 and 2014 through 2015 data for the geographic distribution and borrower income distribution criteria. This was due to changes instituted by the 2014 Office of Management and Budget (OMB) MA geographic boundaries. Refer to the "Description" section under each State Rating section for details on those areas affected by the 2014 OMB changes. Performance tables 1 through 15 in appendix D include only data covered by the analysis period receiving the greatest weight. For AAs impacted by the 2014 OMB changes, performance from 2012 through 2013 is discussed in the applicable narrative sections of the evaluation. In order to perform a meaningful analysis, a minimum of 20 loans in each loan product and AA was needed. This minimum number applied to the analysis period(s) for each AA. The bank did not originate or purchase a sufficient number of multifamily loans in any AA to perform a meaningful analysis. However, multifamily loans meeting a primary purpose of CD were considered in the CD loan analysis. The evaluation period for CD loans, the Investment Test, and Service Test was January 1, 2012, through December 31, 2015.

Data Integrity

In anticipation of our CRA examination, we tested the accuracy of HNB's HMDA and CRA lending data. We also reviewed the appropriateness of CD activities provided for consideration in our evaluation. This included testing of CD loans, investments, and services for accuracy and to determine if they qualified as CD as defined in the regulation. Our testing indicated that HNB's home mortgage, small loans to business, and CD activity could be relied upon for this evaluation.

Selection of Areas for Full-Scope Review

In each state and multistate metropolitan area where the bank has an office, a sample of assessment areas (AAs) within that state/multistate metropolitan area was selected for full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section (as applicable) for details regarding how the areas were selected.

Impact of Changes to Metropolitan Area Delineations and Census Tract Definitions

We considered the impact of changes made to MA delineations and CT definitions by the US Census Bureau and the Office of Management and Budget pursuant to the 2010 Census. We considered the impact of changes in income levels of census tracts that affected the distribution of branches. We also considered the impact on lending distributions of the addition or removal of counties in affected MAs.

Ratings

The bank's overall rating is a blend of multistate metropolitan areas ratings and state ratings. The multistate metropolitan area ratings and state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

In our analysis, performance in the states of Ohio and Michigan carried the most weight in arriving at our overall bank ratings in each test. These areas represent the bank's most significant markets in regards to deposits, reported loans, qualified investments, and service activity. At June 30, 2015, the states of Ohio and Michigan accounted for 57.8 and 17.6 percent of total deposits, respectively. The state of Ohio accounted for 46.1 percent of the bank's total branch network and 59.3 percent of total reportable HMDA, small business, and small farm loans originated during the evaluation period. The state of Michigan accounted for 25.1 percent of the bank's total branch network and 19.8 percent of total reportable HMDA, small business, and small farm loans originated during the evaluation period. Performance in the remaining rating areas was also considered in arriving at overall bank ratings; however, to a somewhat lesser extent. This is due to these areas representing significantly smaller markets for the bank.

Factors Considered in our analysis under each Performance Test

Lending Test

Performance is based on analyses of activity within the bank's assessment areas. HNB reports multiple assessment areas comprised of non-MSA counties in some states. For analysis purposes, we combined all non-MSA counties in a state to form one non-MSA area.

In evaluating the bank's lending performance equal weight was given to the geographic and borrower distribution components of the Lending Test. We placed greater emphasis on the bank's distribution of home mortgage loans than the distribution of small business loans. Within the home mortgage loan category, we placed a greater emphasis on home refinance loans and home purchase loans, with home improvement loans receiving substantially less weight. We placed emphasis on home loans due to it being the bank's primary loan product and based on the affordable housing needs in the bank's AAs.

Analyses were not conducted for any loan product unless HNB originated/purchased at least 20 loans within the AA. Generally, we found that analysis on fewer than 20 loans did not provide meaningful conclusions. The bank did not originate or purchase a sufficient volume of multifamily loans in any AA to perform a meaningful analysis. While activity levels relative to small loans to farms was sufficient for analysis in a few areas, small farm lending had no material impact on any conclusions.

Inside/Outside Ratio

HNB originated a majority of loans inside its AAs. This ratio is a bank-wide calculation and not calculated by individual rating area or AA. The analysis is limited to originations and purchases and does not include any affiliate data. For the combined four-year evaluation period, HNB originated \$23.4 billion of all loan products in the bank's AAs (84 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home refinance (89.3

percent), home purchase (83.7 percent), home improvement (90.4 percent), small loans to business (78.2 percent), small loans to farms (80 percent).

Investment Test

HNB has invested in a variety of investment funds, including statewide and regional funds that have had an impact on the needs of multiple AAs. Investments in funds are allocated to individual AAs based on the underlying projects located in the AAs. In drawing conclusions, we evaluated investment complexity, responsiveness to identified community development needs, and the degree of investment opportunities within the AAs. Activity levels were put into perspective by comparing the dollar level of AA investments to the bank's Tier One Capital allocated to each respective AA

Service Test

We placed the greatest weight on the delivery of financial services and products to geographies and individuals of different income levels through the bank's distribution of branches. Particular focus was placed on serving low- and moderate-income area, including the impact of branch openings and closings. The bank's record of providing community development services received secondary consideration.

Other Performance Data – Lending Test

Product Innovation and Flexibility

HNB offers home mortgage loan products that are flexible. These include various products designed to facilitate homeownership for low- and moderate income borrowers via low (Community Access Mortgage, or HomeTown Mortgage) or no down payment requirements (Veterans Administration or United States Department of Agriculture). In addition, HNB offers innovative home mortgage products such as the Detroit Home Mortgage, or Unsecured Home Improvement Program. These programs are designed to facilitate the simultaneous purchase and renovation of distressed properties.

Other Performance Data – Investment Test

In addition to qualified CD investments made within the bank's AAs and broader statewide areas, including the bank's AAs, HNB made investments in the broader regional area that includes the bank's AAs. These investments were made to organizations or used for activities with a purpose/mandate/function (P/M/F) to serve one or more of the bank's AAs. These were also considered in the analysis of the bank's overall Investment Test performance. During the evaluation period, HNB made two investments totaling \$680,000.

Fair Lending 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 found evidence of violations of the Servicemembers Civil Relief Act involving the bank's failure to provide full interest rate reductions on a small number of loans held by eligible servicemembers. The bank committed to pay restitution to affected servicemembers and enhance procedures and controls to ensure future compliance.

The OCC does not have additional public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The CRA performance rating was not lowered as a result of these findings. We considered the nature, extent, and strength of the evidence of the practices; the extent to which institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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

Multistate Metropolitan Area Ratings

Cincinnati, Ohio-Kentucky-Indiana MMSA

CRA rating for the Cincinnati, Ohio-Kentucky-Indiana MMSA¹: Outstanding

The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Overall HNB's geographic distribution of loans is good. The bank's geographic distribution of home mortgage loans is good and the geographic distribution of small loans to businesses is excellent.
- Overall HNB's borrower distribution of loans is excellent. The bank's borrower distribution of home mortgage loans is excellent. The bank's borrower distribution of small loans to businesses is good.
- A significantly positive level of CD loans that were responsive to community needs.
- HNB's qualified investment activity is excellent and responsive to identified needs.
- Delivery systems are accessible to essentially all geographies and individuals of different income levels. The bank is a leader in providing CD services.

Description of Institution's Operations in Cincinnati, Ohio-Kentucky-Indiana Multistate Metropolitan Area

HNB's AA in the Cincinnati, Ohio-Kentucky-Indiana MMSA (Cincinnati AA) consists of three entire counties in Kentucky (Boone, Kenton, and Campbell), and four counties in Ohio (Hamilton, Butler, Clermont and Warren). This is the portion of the Cincinnati MMSA where the bank has offices. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

HNB had 38 branches within the AA, representing 4.7 percent of the bank's total branch network. As of June 30, 2015, the bank ranked fourth within the AA in total deposits with 2.9 percent market share. HNB's deposits totaled \$2.6 billion. Based on deposits, the Cincinnati AA was the third largest rating area and accounted for approximately 4.8 percent of total bank deposits. During the evaluation period, HNB originated 5.5 percent of its total reportable HMDA loans and 6.3 percent of its small loans to businesses in the AA.

Competition is strong as there are 58 insured institutions operating 699 offices in an area with a population of just under 2 million as of the 2010 Census. Financial institutions range from

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 430 lenders originated home mortgage loans in the AA during 2014. Deposit competitors include U.S. Bank, Fifth Third Bank, and PNC Bank.

Refer to the market profile for the Cincinnati AA in appendix C for detailed demographics and other performance context information for the full-scope assessment area.

Scope of Evaluation in Cincinnati MMSA

We evaluated the bank's performance in the Cincinnati AA using full-scope procedures, which is also the basis for our ratings of this area. This AA accounts for \$2.6 billion and 4.8 percent of total bank deposits. For the evaluation period, the AA loan volume was 7.2 percent. Please refer to appendix A for additional information regarding the full-scope review area.

In drawing conclusions relative to the bank's performance in the Cincinnati AA, we took into consideration community contact information obtained by the OCC. In the Cincinnati AA, we met with two affordable housing organizations, and a local realtor. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the Cincinnati AA is rated "Outstanding." Based on the full-scope review, the bank's performance in the AA is excellent. In performing our analysis, we placed greater weight on the bank's home mortgage loan performance, as it represented the majority of the bank's reportable lending activity.

Lending Activity

Refer to Table 1, Lending Volume, in the Cincinnati MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Cincinnati AA is excellent. In the AA, the bank had a deposit market share of 2.9 percent as of June 30, 2015, and ranked fourth among 58 depository institutions. Competition for home purchase lending was strong, with 373 lenders in the AA. HNB ranked eighth in home purchase lending, with a 2.5 percent market share. For home improvement lending, the bank ranked 11th, out of 130 lenders in the AA, with a 2.5 percent market share. Home refinance lending is also highly competitive with 334 total lenders in the AA. HNB ranked ninth in home refinance lending with 3 percent market share.

For small business lending, HNB ranked ninth out of 106 lenders in the AA. The bank had a market share of 3.8 percent. The top five small business lenders, primarily national credit card banks, control a majority of the market with a combined market share of 63.2 percent. For small farm lending, HNB ranked sixth among 21 lenders in the AA. The bank had a market share of 5.3 percent.

Distribution of Loans by Income Level of the Geography

Overall, the bank's geographic distribution of loans in the Cincinnati AA is good. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Cincinnati MMSA 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.

Overall, the geographic distribution of home mortgage loans is good. In evaluating the geographic distribution of home loans in the Cincinnati AA, we considered the average age of the housing stock in the AA. According to the 2010 U.S. Census, the average age was 62 years for housing in low-income census tracts, and 53 years in moderate-income census tracts. It should be noted that older housing often has higher maintenance costs compared to new housing stock and frequently requires significant repairs to bring the dwelling up to code requirements. These older houses are often less energy efficient, resulting in higher utility costs, which can increase homeownership costs. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall geographic distribution of home purchase loans is good. The percentage of loans in low-income geographies was near to the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies approximated the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies was near the bank's overall market share. The bank's market share in moderate-income geographies substantially met the bank's overall market share.

The overall geographic distribution of home improvement loans is excellent. The percentage of loans in low-income geographies was near to the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in both low- and moderate-income geographies exceeded the overall market share.

The overall geographic distribution of home refinance loans is adequate. The percentage of loans in low-income geographies was below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was near to the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies was below the overall market share in these geographies. The bank's market share in moderate-income geographies exceeded the overall market share in these geographies.

Small Loans to Businesses

Refer to Table 6 in the Cincinnati MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses in both low- and moderate-income geographies exceeded the percentage of businesses in those geographies. Additionally, the bank's market share in both low- and moderate-income geographies exceeded the overall market share.

Small Loans to Farms

Refer to Table 7 in the Cincinnati MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The overall geographic distribution of small loans to farms is adequate, considering there were relatively few farms in the AA. The percentage of small loans to farms in low-income geographies exceeded the percentage of farms in those geographies. However, the percentage of small loans to farms in moderate-income geographies was significantly below the number of farms in those geographies. HNB's market share in the low-income geographies exceeded the overall market share of small loans to farms. The bank did not achieve a market share in moderate-income geographies.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed the bank's home mortgage and small business lending activity over the evaluation period in the AA to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall distribution of lending by income level of borrower is excellent. As noted previously, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Cincinnati MMSA 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.

Overall, the borrower distribution of home mortgage loans is excellent. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period. We considered the constraints on lending to low-income borrowers resulting from the ratio of housing costs to low-income reflected in the Cincinnati MMSA section of appendix C in evaluating the distribution of loans.

The overall borrower distribution of home purchase loans is excellent. The percentage of home purchase loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers was near to the overall market share. The market share to moderate-income borrowers approximated the overall market share.

The overall borrower distribution of home improvement loans is excellent. The percentage of loans to low-income borrowers was somewhat near to the percentage of low-income families. The percentage of loans to moderate-income families exceeded the percentage of such families. The bank's market share of loans to low-income borrowers exceeded the overall market share. The bank's market share of loans to moderate-income borrowers was near to the overall market share.

The overall borrower distribution of home refinance loans is excellent, when considering market share performance. The percentage of refinance loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income families exceeded the percentage of such families. The bank's market share to both low- and moderate-income borrowers exceeded the overall market share.

Small Loans to Businesses

Refer to Table 11 in the Cincinnati MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is good. The percentage of small loans to small businesses was below the percentage of small businesses. The bank's market share of small loans to small businesses exceeded the overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 12 in the Cincinnati MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to farms is good. The percentage of small loans to small farms was below the percentage of small farms. The bank's market share of small loans to small farms exceeded the overall small loans to farms market share.

Community Development Lending

Refer to Table 1 Lending Volume in the Cincinnati MMSA section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending was exceptionally strong, and had a significantly positive impact on its overall lending performance in the Cincinnati AA. This performance compensated for overall good retail lending performance. HNB originated 32 loans totaling \$102.1 million in qualified CD loans in the AA during the evaluation period. This volume represented 37.3 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated good responsiveness to AA needs. CD loans supported affordable housing initiatives for LMI individuals, and activities that revitalized or stabilized LMI geographies in the AA.

Specific examples of the CD loans originated during this evaluation period include:

- A \$6.8 million affordable housing construction loan to fund the construction of a LIHTC apartment community. Units are targeted to LMI individuals and include four Public Housing units and 12 Section 8 units.
- A new \$1.1 million interim construction SBA 7a term loan for startup expenses of a new restaurant in a low-income census tract. The City of Cincinnati executed a CRA Tax Exemption Agreement with the bank's borrower for this project.

Product Innovation and Flexibility

HNB offers a product mix of flexible loans in the Cincinnati AA, which has a positive impact on the bank's lending performance. These loan programs include Community Access Mortgage (CAM), Federal Housing Authority (FHA), Fannie Mae (FNMA) HomeStyle Renovation, FNMA Welcome Home, Huntington Hometown Mortgage, Kentucky Housing Corporation, Ohio Housing Finance Authority, Neighborhood Stabilization Program (NSP), and United States Department of Agriculture (USDA). These loan programs offer flexibility in payment terms, credit guidelines, down payments, and private mortgage insurance (PMI). HNB targets CAM mortgages specifically to LMI individuals or geographies; however, the intended purpose of all loan programs described above is to make owning or rehabilitating a home in the AA more affordable. HNB originated 1,639 loans that were considered flexible in the AA, totaling \$238.8 million.

INVESTMENT TEST

The bank's performance under the Investment Test in the Cincinnati AA is rated "Outstanding." Based on full-scope review, the bank's performance in the Cincinnati AA is excellent.

Refer to Table 14 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, HNB originated 79 investments, donations and grants in the AA totaling \$28 million. This consisted of 25 investments totaling \$27.8 million, with 54 donations and grants totaling over \$277,000. In addition, 25 prior period investments with a total book value of \$2.5 million remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$30.6 million represented 11.2 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified needs of the AA is good, with affordable housing needs especially addressed.

In terms of dollar volume, 78.7 percent of the bank's investments, donations, and grants were allocated to affordable housing.

One investment of note is \$8.9 million in a fund structured to leverage investor dollars into two projects in Cincinnati, Ohio through the use of the HUD 108 loan program. The investment created 85 new units of public supportive affordable housing. The project also provided 39 units of workforce housing through the preservation of 10 historic buildings near a newly built casino.

SERVICE TEST

HNB's performance under the Service Test in the Cincinnati AA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Cincinnati AA is good. While the bank's record of opening and closing branches in the AA is considered poor, the branch distribution is considered good, along with excellent CD service performance.

Retail Banking Services

Refer to Table 15 in the Multistate MSA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB's branch distribution in the AA is good, when considering branches near LMI geographies. Branches are accessible to geographies and individuals of different income levels. Primary consideration was given to HNB's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in middle- or upper-income geographies that border LMI geographies, or are adjacent and within one-half mile proximity to LMI geographies. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the assessment areas, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. Although the bank had no branches in low-income CTs in the AA, three branches in middle- and upper-income CTs were near low-income CTs as described above. The bank had 10 branches in moderate-income geographies. The percentage of branches in moderate-income CTs exceeded the percentage of the AA population living in moderate-income CTs.

Branch openings and closings adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. One branch was opened, and eight branches were closed during the evaluation period. Two branches in middle-income geographies were closed due to management's overall strategic decision to exit branches in retirement facilities. Additionally the bank closed three branches in moderate-income CTs, two in middle-income CTs and one in an upper-income CT due to periodic analysis of branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance.

HNB's hours and services offered throughout the AA do not vary in a way that inconveniences portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

HNB's performance in providing CD services in the Cincinnati AA is excellent. The bank is a leader in providing community development services. One hundred and ninety one employees participated in 639 CD activities with 57 organizations, totaling 2,404 hours, which included 11 leadership positions. The bank's efforts demonstrated excellent responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups, low- and moderate-income persons and families, and small businesses. A significant effort focused on affordable housing, an identified community need. Volunteers provided 72 hours of assistance in submitting FHLB AHP grant submissions for seven organizations. Volunteers also assisted in developing or providing homeowner education classes to low- and moderate-income borrowers of three organizations. Notably, one organization stated in OCC Community Contacts that HNB reached out to provide Homebuyer Education Modules. Tax Preparation for low- and moderate-income (LMI) individuals is another identified community service need to which bank employees were responsive. Economic Development is another identified community need, including lines of credit to small contractors that employees served.

Of 164 total hours devoted to economic development, two employees provided 114 hours of Board membership to Hamilton County Development Co., Inc. (HCDC). HCDC is a not-for-profit economic development corporation providing financing and entrepreneurial assistance for companies that locate or expand in designated enterprise zones or community reinvestment areas within the AA. HCDC promotes job creation and provides business incubation, business lending and economic development services.

Five HNB employees provided 87 hours of free tax preparation service through the Volunteer Tax Income Assistance (VITA) program, and offered financial education to LMI individuals eligible for VITA. The VITA program is offered through the Brighton Centers', nonprofit arm whose mission is to create opportunities for individuals and families to reach self-sufficiency through support services, education and leadership through programs and services including workforce development, substance abuse recovery, affordable housing, financial education and counseling, youth services, and neighborhood based programs.

Weirton-Steubenville, Ohio-West Virginia MMSA

CRA rating for the Weirton-Steubenville, Ohio-West Virginia MMSA²: Satisfactory

The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Needs to Improve
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans is good. The geographic distribution of home mortgage loans is good, and the geographic distribution of small loans to businesses is excellent.
- The borrower distribution of lending by income level is good. The borrower distribution of home mortgage loans is good, and excellent for small loans to businesses.
- HNB's qualified investment activity is poor, although the activities engaged in were generally responsive to identified needs.
- Delivery systems are reasonably accessible to essentially all geographies and individuals of different income levels. The bank provides an adequate level of CD services.

Description of Institution's Operations in Weirton-Steubenville, Ohio-West Virginia MMSA

HNB's assessment area in the Weirton-Steubenville, Ohio-West Virginia MMSA (Weirton AA) consists of two of the three entire counties that comprise the Weirton-Steubenville MMSA; Hancock County in West Virginia and Jefferson County, Ohio. This is the portion of the Weirton-Steubenville MMSA where the bank has offices. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

HNB had 10 branches within the AA, representing 1.2 percent of the bank's total branch network. As of June 30, 2015, the bank ranked first within the AA in total deposits with 24.9 percent market share. HNB's deposits totaled \$374.6 million. Based on deposits, the Weirton AA was HNB's 8th largest rating area and accounted for approximately 0.7 percent of total bank deposits. During the evaluation period, HNB originated 1 percent of its total reportable HMDA loans and 0.3 percent of its small loans to businesses within the AA.

Competition is strong as there are 11 insured institutions operating 38 offices in an area with a population of roughly 100,000 as of the 2010 Census. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, 100 lenders originated home mortgage loans in the AA during 2014. Deposit competitors include Wesbanco Bank, Hancock County Savings Bank, and PNC Bank.

² This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Refer to the market profile for the Weirton AA in appendix C for detailed demographics and other performance context information for the full-scope assessment area.

Scope of Evaluation in Weirton MMSA

We evaluated the bank's performance in the Weirton AA using full-scope procedures, which is also the basis for our ratings of this area. This AA accounts for \$374.6 million and 0.7 percent of total bank deposits. For the evaluation period, the AA loan volume was 0.9 percent of total lending. Please refer to appendix A for additional information regarding the full-scope review area.

The bank did not originate or purchase a sufficient volume of small loans to farms during the evaluation period to perform a meaningful analysis.

In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC. In conjunction with this examination, we met with an economic development organization and a community action and health services organization. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the Weirton AA is rated "High Satisfactory." Based on the full-scope review, the bank's performance in the AA is good. In performing our analysis, we placed greater weight on the bank's home mortgage loan performance, as it represented the majority of the bank's reportable lending activity.

Lending Activity

Refer to Table 1, Lending Volume, in the Weirton MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Weirton AA is good. In the AA, the bank had deposit market share of 24.9 percent as of June 30, 2015, and ranked first among 11 depository institutions. HNB ranked fifth in home purchase lending, out of 79 lenders in the AA, with a 7.9 percent market share. For home improvement lending, the bank ranked third, out of 21 lenders in the AA, with an 11.6 percent market share. HNB ranked first in home refinance lending, out of 69 lenders in the AA, with 23 percent market share.

For small business lending, HNB ranked seventh out of 33 lenders in the AA. The bank has a market share of 5 percent. The top five small business lenders, primarily national credit card banks, control a majority of the market with a combined market share of 60 percent.

Distribution of Loans by Income Level of the Geography

Overall, the bank's geographic distribution of loans in the Weirton AA is good. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity. Additionally, within home mortgage lending and for the same reason, we placed most weight on home refinance lending, followed by home purchase lending, and then home improvement lending. We considered the constraints on lending in low-income CTs resulting from the limited number of owner-occupied housing units in low-income CTs reflected in appendix C in evaluating the distribution of loans.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Weirton MMSA 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.

Overall, the geographic distribution of home mortgage loans is good. In evaluating the geographic distribution of home loans in the Wheeling AA, it is important to note that the AA's low-income census tracts contain only 262 owner-occupied housing units. Additionally, according to the 2010 U.S. Census, 33.8 percent of housing units in low-income geographies are vacant. Based on this data, we placed significantly more emphasis on performance in moderate-income geographies. We also considered the average age of the housing stock in the AA. According to the 2010 U.S. Census, the average age was 61 years for housing in low-income census tracts and 58 years in moderate-income census tracts. It should be noted that older housing often has higher maintenance costs compared to new housing stock and frequently requires significant repairs to bring the dwelling up to code requirements. These older houses are often less energy efficient, resulting in higher utility costs, which can increase homeownership costs.

The overall geographic distribution of home purchase loans is good, when considering limited housing in low-income geographies. The percentage of loans in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was near to the percentage of owner-occupied units in these geographies. The bank did not achieve a market share in low-income geographies. The bank's market share in moderate-income geographies was near to the bank's overall market share.

The overall geographic distribution of home improvement loans is excellent, when considering limited housing in low-income geographies. The bank did not originate or purchase any home improvement loans in low-income geographies. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income geographies exceeded the overall market share.

The overall geographic distribution of home refinance loans is adequate, when considering limited housing in low-income geographies. The bank did not originate or purchase any home refinance loans in low-income geographies. The percentage of loans in moderate-income geographies was somewhat below the percentage of owner-occupied units in these

geographies. The bank's market share in moderate-income geographies was near to the overall market share.

Small Loans to Businesses

Refer to Table 6 in the Weirton MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The portion of small loans to businesses in low-income geographies exceeded the percentage of businesses in those geographies. The portion of loans in moderate-income geographies was near to the percentage of businesses in these geographies. The bank's market share in both low- and moderate-income geographies exceeded their overall small loans to businesses market share.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed the bank's home mortgage and small business lending activity over the evaluation period in the AA to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall distribution of lending by income level of borrower is good. As noted previously, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Weirton MMSA 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. We considered the constraints on lending to low-income borrowers resulting from the ratio of housing costs to low-income reflected in the Weirton MMSA section of appendix C in evaluating the distribution of loans.

Overall, the borrower distribution of home mortgage loans is good. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall borrower distribution of home purchase loans is good. The percentage of home purchase loans to low-income borrowers was below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers was below the overall market share. The bank's market share of loans to moderate-income borrowers exceeded the overall market share.

The overall borrower distribution of home improvement loans is excellent. The percentage of loans to low-income borrowers, while below the percentage of low-income families, significantly exceeded the industry evident through market share performance. The percentage

of loans to moderate-income borrowers exceeded the percentage of such families. The bank's market share of loans to both low- and moderate-income borrowers exceeded the overall market share.

The overall borrower distribution of home refinance loans is good. The percentage of refinance loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income families exceeded the percentage of such families. The bank's market share to low-income borrowers exceeded the overall market share. The bank's market share to moderate-income borrowers substantially meets the overall market share.

Small Loans to Businesses

Refer to Table 11 in the Weirton MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is excellent, when considering market share performance. The percentage of small loans to small businesses was near to the percentage of small businesses. The bank's market share of loans to small businesses exceeded the overall loans to businesses market share.

Community Development Lending

Refer to Table 1 Lending Volume in the Weirton MMSA section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

HNB's CD lending performance in the Weirton AA was poor, however, it was responsive to community needs. Given the strength of retail lending, CD lending had a neutral impact on its overall lending. HNB originated one qualifying CD loan totaling \$151,000 in the AA during the evaluation period. This volume represented 0.4 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated adequate responsiveness to AA needs. The CD loan supported community service organizations in the AA.

Product Innovation and Flexibility

HNB offers a product mix of flexible loans in the Weirton AA, which has a positive impact on the bank's lending performance. These loan programs include Federal Housing Authority (FHA), Fannie Mae (FNMA) Expanded Approval, FNMA HomeStyle Renovation, FNMA Welcome Home, HomePath, Ohio Housing Finance Authority, and United States Department of Agriculture (USDA). These loan programs offer flexibility in payment terms, credit guidelines, down payments, and private mortgage insurance (PMI). The intended purpose of all the loan programs described above is to make owning or rehabilitating a home in the AA more

affordable. HNB originated 134 loans that were considered flexible in the AA, totaling \$11 million.

INVESTMENT TEST

The bank's performance under the Investment Test in the Weirton AA is rated "Needs to Improve." Based on full-scope review, the bank's performance in the Weirton AA is poor.

Refer to Table 14 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, HNB originated 18 investments, donations and grants in the AA totaling \$290,000. This consisted of six investments totaling \$120,000, with 12 donations and grants totaling over \$170,000. In addition, 12 prior period investments with a total book value of \$176,000 remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$466,000 represented 1.2 percent of Tier 1 Capital allocated to the AA. Despite the very low level of investments in the AA, responsiveness to the identified needs of the AA is adequate, with particular focus on affordable housing needs. In terms of dollar volume, 100 percent of the bank's investments, donations, and grants were allocated to affordable housing.

SERVICE TEST

HNB's performance under the Service Test in the Weirton AA is rated "Low Satisfactory." Based on a full-scope review of the Weirton AA, the bank's performance is adequate.

Retail Banking Services

Refer to Table 15 in the Multistate MSA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB's branch distribution in the AA is adequate when considering branches near LMI CTs. Branches are readily accessible to geographies and individuals of different income levels. Primary consideration was given to HNB's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in middle- or upper-income geographies that border LMI geographies, or are adjacent to and within one-half mile in proximity of LMI geographies. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the assessment areas, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. The bank had a branch in one of the two low-income CTs in the AA. The percentage of branches in low-income CTs exceeded the percentage of the population living in low-income CTs as a result of the one branch. Although the bank had no branches in the seven moderate-income CTs, consideration was given to four branches in middle-income geographies that were located near moderate-income geographies as described above.

Branch openings and closings have not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. No branches were opened during the evaluation period. One branch located in a middle-income geography was closed due to periodic analysis of branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

HNB's performance in providing CD services in the Weirton AA is adequate. The bank demonstrates an adequate level of providing community development services. Seventeen employees participated in 48 CD activities with seven organizations, totaling 492 hours, which included four leadership positions. The bank's efforts demonstrated adequate responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups and low- and moderate-income persons and families. Efforts in affordable housing, an identified community need, included providing 18 hours of assistance in submitting FHLB AHP grant submissions for one organization. Community services also included 153 hours of BOD service to community service- focused organizations.

One HNB employee provided 75 hours of Board service for Mingo Social Services in Mingo Junction, OH. This organization helps to provide food and assistance with utility and medical bills for the low-income population.

Wheeling, West Virginia-Ohio MMSA

CRA rating for the Wheeling, West Virginia-Ohio MMSA³: Satisfactory

The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating:

- The geographic distribution of loans is adequate. The distribution of home mortgage loans and small loans to businesses is adequate.
- The borrower distribution of loans is good. Adequate home mortgage loan borrower distribution was augmented by excellent distribution of loans to businesses of different revenue sizes.
- Qualified investment activity is good and responsive to identified needs.
- Delivery systems are accessible to essentially all geographies and individuals of different incomes.

Description of Institution's Operations in Wheeling, West Virginia-Ohio Multi-State Metropolitan Area

HNB's assessment area in the Wheeling, West Virginia-Ohio MMSA (Wheeling AA) consists of two of the three entire counties that define the Wheeling MMSA; Belmont County, OH and Ohio County, WV. This is the portion of the Wheeling MMSA where the bank has offices. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

HNB had six branches within the AA, representing 0.7 percent of the bank's total branch network. June 30, 2015 FDIC deposit data reflects that HNB had \$202 million in deposits in the area, which ranked fifth with a 6.1 percent share of the insured deposit market. The Wheeling AA was the 9th largest rating area based on deposits and accounted for approximately 0.4 percent of total bank deposits. During the evaluation period, HNB originated 0.4 percent of its total reportable HMDA loans and 0.2 percent of its small loans to businesses within the AA.

Competition is strong as there are 15 insured institutions operating 56 offices in an area with a population of just under 115,000 as of the 2010 Census. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, 122 lenders originated home mortgage loans in the AA during 2014. The largest deposit competitors include Wesbanco Bank, Belmont Savings Bank, and United Bank.

³ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Refer to the market profile for the Wheeling AA in appendix C for detailed demographics and other performance context information for the full-scope assessment area.

Scope of Evaluation in Wheeling MMSA

We evaluated the bank's performance in the Wheeling AA using full-scope procedures, which is also the basis for our ratings of this area. This AA accounts for \$202 million and 0.4 percent of total bank deposits. For the evaluation period, the AA loan volume was 0.4 percent of total loans. Please refer to appendix A for additional information for the full-scope assessment area.

The bank did not originate or purchase a sufficient volume of small loans to farms during the evaluation period to perform a meaningful analysis.

In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC. In conjunction with this examination, we met with an economic development organization and community action and health services organization. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the Wheeling AA is rated "Low Satisfactory." Based on the full-scope review, the bank's performance in the AA is adequate. In performing our analysis, we placed greater weight on the bank's home mortgage loan performance, as it represented the majority of the bank's reportable lending activity.

Lending Activity

Refer to Table 1, Lending Volume, in the Wheeling MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Wheeling AA is good. In the AA, the bank had a deposit market share of 6.1 percent as of June 30, 2015, and ranked fifth among 15 depository institutions. HNB ranked 11th, out of 91 lenders in the AA, in home purchase lending, with 3 percent market share. For home improvement lending, the bank ranked seventh, out of 29 lenders in the AA, with a 4.6 percent market share. HNB ranked fourth in home refinance lending, out of 81 lenders in the AA, with 7.3 percent market share.

For small business lending, HNB is ranked 13th out of 37 lenders in the AA. The bank has a market share of 2.6 percent. The top five small business lenders, primarily national credit card banks, control a majority of the market with a combined market share of 53.6 percent.

Distribution of Loans by Income Level of the Geography

Overall, the bank's geographic distribution of loans in the Wheeling AA is adequate. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Wheeling MMSA 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.

Overall, the geographic distribution of home mortgage loans is adequate. In evaluating the geographic distribution of home loans in the Wheeling AA, the AA's low-income census tracts contain a low number of owner-occupied housing units (981), a potential constraint to lending opportunities. In addition, we considered the average age of the housing stock in the AA. According to the 2010 U.S. Census, the average age was 68 years for housing in low-income census tracts and 66 years in moderate-income census tracts. It should be noted here that older housing often has higher maintenance costs compared to new housing stock and frequently requires significant repairs to bring dwelling up to code requirements. These older houses are often less energy efficient, resulting in higher utility costs, which can increase homeownership costs. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall geographic distribution of home purchase loans is good. The percentage of loans in low-income geographies exceeded the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies exceeded the bank's overall market share. The bank's market share in moderate-income geographies was significantly below the bank's overall market share.

The overall geographic distribution of home improvement loans is good. The percentage of loans in both low- and moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank did not achieve a market share in low-income geographies. The bank's market share in moderate-income geographies was below the overall market share.

The overall geographic distribution of home refinance loans is poor. The percentage of loans in both low- and moderate-income geographies was well below the percentage of owner-occupied units in these geographies. The bank did not achieve a market share in low-income geographies. The bank's market share in moderate-income geographies exceeded the overall market share.

Small Loans to Businesses

Refer to Table 6 in the Wheeling MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is adequate. We considered the number of businesses (868) located in low-income geographies as a potential constraint in our analysis. The percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in those geographies. The portion of loans in moderate-income geographies exceeded the percentage of businesses in these geographies. The bank's market share in low-income geographies was significantly below their overall market share in these geographies. The bank's market share in moderate-income geographies exceeded the overall market share in these geographies.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed the bank's home mortgage and small business lending activity over the evaluation period in the AA to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall distribution of lending by income level of borrower is good. Overall adequate home mortgage performance was positively impacted by excellent small loans to business performance.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Wheeling MMSA 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.

Overall, the borrower distribution of home mortgage loans is adequate. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall borrower distribution of home purchase loans is adequate. The percentage of home purchase loans to low-income borrowers was well below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank did not achieve a market share to low-income borrowers. The bank's market share to moderate-income borrowers was below the overall market share.

The overall borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income families exceeded the percentage of such families. The bank's market share of loans to low-income borrowers was below the overall market share. The bank's market share of loans to moderate-income borrowers exceeded the overall market share.

The overall borrower distribution of home refinance loans is adequate. The percentage of refinance loans to both low- and moderate-income borrowers was below the percentage of such families. The bank's market share to low-income borrowers was below the overall market

share. The bank's market share to moderate-income borrowers exceeded the overall market share.

Small Loans to Businesses

Refer to Table 11 in the Wheeling MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is excellent, when considering market share performance. The percentage of small loans to small businesses was near to the percentage of small businesses. The bank's market share of small loans to small businesses exceeded the overall small loans to businesses market share.

Community Development Lending

Refer to Table 1 Lending Volume in the Wheeling MMSA section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

HNB's CD lending had a positive impact on its overall lending performance in the Wheeling AA. HNB originated three loans totaling \$2.2 million in qualified CD loans in the AA during the evaluation period. This volume represented 10.1 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated adequate responsiveness to AA needs. CD loans supported affordable housing initiatives for LMI individuals.

Specific examples of the CD loans originated during this evaluation period include:

- A \$1.6 million construction loan for a 40-unit senior low-income housing tax credit (LIHTC) apartment building located in Wheeling, WV.
- A \$363,000 loan for rehabilitation of an affordable housing project in Wheeling, WV. The project has also received grants from the Federal Home Loan Bank through its Affordable Housing Program.

Product Innovation and Flexibility

HNB offers a product mix of flexible loans in the Wheeling AA, which has a neutral impact on the bank's lending performance. These loan programs include Federal Housing Authority (FHA), Fannie Mae (FNMA) Expanded Approval, and West Virginia Housing Development Fund. These loan programs offer flexibility in payment terms, credit guidelines, down payments, and private mortgage insurance (PMI). The intended purpose of all loan programs is to make owning or rehabilitating a home in the AA more affordable. HNB originated 50 loans that were considered flexible in the AA, totaling \$5.6 million.

INVESTMENT TEST

The bank's performance under the Investment Test in the Wheeling AA is rated "High Satisfactory." Based on full-scope review, the bank's performance in the Wheeling AA is good.

Refer to Table 14 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, HNB originated six investments, donations and grants in the AA totaling \$795,000. This consisted of five investments totaling \$794,000, with one donation totaling over \$1,000. In addition, nine prior period investments with a total book value of \$710,000 remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$1.5 million represented 7 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified needs of the AA is adequate, with affordable housing needs especially addressed. In terms of dollar volume, 100 percent of the bank's investments, donations, and grants were allocated to affordable housing.

SERVICE TEST

HNB's performance under the Service Test in the Wheeling AA is rated "High Satisfactory." Based on a full-scope review of the Wheeling AA, the bank's performance is good.

Retail Banking Services

Refer to Table 15 in the Multistate MSA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB's branch distribution in the AA is good when considering branches near LMI CTs and the bank's relatively limited presence in the AA. Branches are reasonably accessible to geographies and individuals of different income levels. Primary consideration was given to HNB's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in middle- or upper-income geographies that border LMI geographies or are adjacent to and within one-half mile in proximity of LMI geographies. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the assessment areas, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. The bank had a branch in one of the four low-income CTs in the AA. The percentage of branches in low-income geographies exceeded the percentage of the population living in low-income CTs. The bank had no branches in the seven moderate-income geographies; however, consideration was given to one branch in a middle-income geography that was located near a moderate-income geography as described above.

Branch openings and closings have not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. No branches were opened during the evaluation period. One branch that was located in an upper-income CT was closed during the

review period, due to periodic analysis of branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

HNB's performance in providing CD services in the Wheeling AA is adequate. The bank demonstrates a limited level of providing community development services. Fourteen employees participated in 43 CD activities with five organizations, totaling 295 hours, which included one leadership position. The bank's efforts demonstrated adequate responsiveness in providing community needs through technical assistance on financial and banking related matters to community groups and low- and moderate-income persons and families. Efforts in affordable housing, an identified overwhelming community need, included providing five hours of assistance in submitting an FHLB AHP grant submission for one organization. The remainder of the community services provided during the evaluation period were in the provision of financial education to prior inmates and low- and moderate- income persons.

Employees provided 238 hours of financial education to LMI students through Teen Money Smart Workshops at Martins Ferry High School. The school is located in a moderate-income census tract and 99% of the students qualify for free, or reduced cost lunch.

Employees presented 17 hours of Money Smart workshops in 2012 and 2015 to homeless residents of the YWCA of Wheeling's temporary shelter and to LMI employees of the YWCA. The YWCA is located in a low-income tract and offers various services including a resident and emergency homeless shelter, transitional housing program, and family violence prevention programs.

Youngstown–Warren–Boardman, Ohio-Pennsylvania MMSA

CRA rating for the Youngstown-Warren-Boardman, OH-PA MMSA⁴: Outstanding

The Lending Test is rated:	Outstanding
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Overall, the geographic distribution of loans is adequate. Poor home mortgage loan distribution was augmented by excellent small loans to businesses distribution.
- The borrower distribution of lending by income level is excellent. The borrower distribution of both home mortgage and small loans to businesses is excellent.
- CD lending had a significantly positive impact on the overall lending performance, and was responsive to identified needs.
- Qualified investment activity is adequate and responsive to identified needs.
- Delivery systems are reasonably accessible to essentially all geographies and individuals of different income levels. The bank is a leader in the provision of CD services.

Description of Institution's Operations in Youngstown–Warren–Boardman, Ohio-Pennsylvania MMSA

HNB's assessment area in the Youngstown–Warren–Boardman, Ohio-Pennsylvania MMSA (Youngstown AA) consists of each of the three entire counties within the MMSA; Mahoning and Trumbull Counties in Ohio, and Mercer County in Pennsylvania. This is the portion of the MMSA where the bank has offices. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

HNB has 40 branches within the AA, representing 4.9 percent of the bank's total branch network. June 30, 2015 FDIC deposit data reflects that HNB had \$2 billion in deposits in the area, which ranked first in size with a 22.3 percent share of the insured deposit market. The Youngstown AA was HNB's sixth largest rating area based on deposits and accounted for approximately 3.7 percent of total bank deposits. During the evaluation period, HNB originated 3.6 percent of its total reportable HMDA loans and 3.3 percent of its small loans to businesses within the MSA.

Competition is strong as there are 18 insured institutions operating 180 offices in an area with a population of just under 566,000 as of the 2010 Census. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According

⁴ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

to aggregate HMDA data, over 243 lenders originated home mortgage loans in the AA during 2014. The largest deposit competitors include PNC Bank, F.N.B. Corporation, JP Morgan Chase and The Home Savings and Loan Company of Youngstown.

Refer to the market profile for the Youngstown MMSA in appendix C for detailed demographics and other performance context information for the full-scope assessment area.

Scope of Evaluation in Youngstown AA

We evaluated the bank's performance in the Youngstown AA using full-scope procedures, which is also the basis for our ratings this area. This AA accounts for \$2 billion and 3.7 percent of total bank deposits. For the evaluation period, the AA loan volume was 4.1 percent. Please refer to appendix A for additional information regarding the full-scope review area.

In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC and the bank. In conjunction with this examination, we met with a neighborhood development corporation. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the Youngstown AA is rated "Outstanding." Based on the full-scope review, the bank's performance in the AA is excellent. In performing our analysis, we placed greater weight on the bank's home mortgage loan performance, as it represented the majority of the bank's reportable lending activity.

Lending Activity

Refer to Table 1, Lending Volume, in the Youngstown MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Youngstown AA is good. In the AA, the bank had a deposit market share of 22.32 percent as of June 30, 2015, and ranked first among 19 depository institutions. HNB ranked third, out of 184 lenders in the AA, in home purchase lending, with 6.1 percent market share. For home improvement lending, the bank ranked ninth, out of 61 lenders in the AA, with 4.86 percent market share. HNB ranked first, out of 180 lenders in the AA, in home refinance lending with 10.99 percent market share.

For small business lending, HNB ranked sixth among 66 lenders in the AA. The bank has a market share of 7.45 percent. The top five small business lenders, primarily national credit card banks, control a majority of the market with a combined market share of 55.96 percent. For small farm lending, HNB ranked fourth among 16 lenders in the AA. The bank has a market share of 10.84 percent.

Distribution of Loans by Income Level of the Geography

Overall, the bank's geographic distribution of loans in the Youngstown AA is adequate. Poor home mortgage performance was augmented by excellent small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Youngstown MMSA 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.

Overall, the geographic distribution of home mortgage loans is poor. In performing our analysis we considered the average age of the housing stock in the AA. According to the 2010 U.S. Census, the average age was 64 years for housing in low-income census tracts and 60 years in moderate-income census tracts. It should be noted that older housing often has higher maintenance costs compared to new housing stock and frequently requires significant repairs to bring dwelling up to code requirements. These older houses are often less energy efficient, resulting in higher utility costs, which can increase homeownership costs. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall geographic distribution of home purchase loans is poor. The percentage of loans in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was well below the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies exceeded the bank's overall market share. The bank's market share in moderate-income geographies was below the bank's overall market share.

The overall geographic distribution of home improvement loans is good. The percentage of loans in low-income geographies was well below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was near to the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies exceeded the overall market share. The bank's market share in moderate-income geographies substantially met the overall market share.

The overall geographic distribution of home refinance loans is poor. The percentage of loans in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was well below the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies was significantly below the overall market share in these geographies. The bank's market share in moderate-income geographies exceeded the overall market share in these geographies.

Small Loans to Businesses

Refer to Table 6 in the Youngstown MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The portion of loans in low-income geographies exceeded the percentage of businesses in those geographies. The portion of loans in moderate-income geographies was near to the percentage of small businesses in these geographies. The bank's market share in low-income geographies exceeded their overall market share. The bank's market share in moderate-income geographies substantially met their overall market share.

Small Loans to Farms

Refer to Table 7 in the Youngstown MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The overall geographic distribution of small loans to farms is adequate, when considering the very limited opportunities for the bank to originate small loans to farms in low- and moderate-income geographies. According to 2010 Census data, low- and moderate-income census tracts contained only 24 and 70 farms, respectively as reflected in the Youngstown MMSA section of appendix C. The bank did not originate or purchase any small loans to farms in low- or moderate-income geographies.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed the bank's home mortgage and small business lending activity over the evaluation period in the AA to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall distribution of lending by income level of borrower is excellent. As noted previously, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity. We considered the constraints on lending to low-income borrowers resulting from the ratio of housing costs to low-income reflected in appendix C in evaluating the distribution of loans. Additionally, we considered the impact that higher poverty and unemployment rates would have on lending performance in the AA as part of our conclusions.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Youngstown MMSA 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.

Overall, the borrower distribution of home mortgage loans is excellent. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall borrower distribution of home purchase loans is excellent when considering market share performance. The percentage of home purchase loans to low-income borrowers was below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to both low- and moderate-income borrowers exceeded the overall market share.

The overall borrower distribution of home improvement loans is excellent. The percentage of loans to low-income borrowers was considered good. The percentage of loans to moderate-income families exceeded the percentage of such families. The bank's market share of loans to both low- and moderate-income borrowers exceeded the overall market share.

The overall borrower distribution of home refinance loans is excellent when considering market share performance. The percentage of refinance loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income families exceeded the percentage of such families. The bank's market share to both low- and moderate-income borrowers exceeded the overall market share.

Small Loans to Businesses

Refer to Table 11 in the Youngstown MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is excellent when considering market share performance. The percentage of small loans to small businesses was near to the percentage of small businesses. The bank's market share of small loans to small businesses exceeded the overall market share of small loans to businesses.

Small Loans to Farms

Refer to Table 12 in the Youngstown MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to farms is excellent when considering market share performance. The percentage of small loans to small farms was near to the percentage of small farms in the AA. HNB's market share of small loans to small farms exceeded the overall market share of small loans to farms.

Community Development Lending

Refer to Table 1 Lending Volume in the Youngstown MMSA section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending was exceptionally strong and had a significantly positive impact on the overall lending performance in the Youngstown AA. This performance enhanced overall good retail lending performance. HNB originated 12 loans totaling \$26.50 million in qualified CD loans in the AA during the evaluation period. This volume represented 12.35 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated good responsiveness to AA needs. CD loans supported small businesses, affordable housing initiatives for LMI individuals, supported community service organizations in the AA, and activities that promoted revitalized or stabilized LMI geographies in the AA.

Specific examples of the CD loans originated during this evaluation period include:

- A \$7.26 million construction loan to construct a 44-unit LIHTC rental project targeting low and moderate-income families. This project received Pennsylvania Home Funds (PHF) of \$1.15 million.
- A \$563,000 construction loan to rehab a former hospital located in a low-income census tract into 76 units of low-income housing for a nonprofit organization. This transaction also involved a Federal Home Loan Board (FHLB) AHP grant.

Product Innovation and Flexibility

HNB offers a product mix of flexible loans in the Youngstown AA, which has a positive impact on the bank's lending performance. These loan programs include Community Access Mortgage (CAM), Federal Housing Authority (FHA), Fannie Mae (FNMA) Expanded Approval, FNMA HomeStyle Renovation, HomePath, Huntington Hometown Mortgage, Neighborhood Stabilization Program (NSP), Ohio Housing Finance Agency, and United States Department of Agriculture (USDA). These loan programs offer flexibility in payment terms, credit guidelines, down payments, and private mortgage insurance (PMI). HNB targets CAM mortgages specifically to LMI individuals or geographies; however, the intended purpose of all loan programs is to make owning or rehabilitating a home in the AA more affordable. Huntington originated 554 loans that were considered flexible in the AA, totaling \$53.71 million.

INVESTMENT TEST

The bank's performance under the Investment Test in the Youngstown MSAA is rated "Low Satisfactory." Based on full-scope review, the bank's performance in the Youngstown MMSA is adequate.

Refer to Table 14 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, HNB originated 36 investments, donations and grants in the AA totaling \$9 million. This consisted of 11 investments totaling \$8.8 million, with 25 donations and grants totaling over \$233,000. In addition, 12 prior period investments with a total book value of \$800,000 remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of 9.9 million represented 4.60 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified needs of the AA is adequate, with affordable housing needs especially addressed. In terms of dollar volume, 96.52 percent of the bank's investments, donations, and grants were allocated to affordable housing, which is an identified need.

SERVICE TEST

HNB's performance under the Service Test in the Youngstown AA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Youngstown AA is good.

Retail Banking Services

Refer to Table 15 in the Multistate MSA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB's branch distribution in the AA is adequate when considering branches near LMI CTs. Branches are accessible to geographies and individuals of different income levels. Primary consideration was given to HNB's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in middle- or upper-income geographies that border LMI geographies, or are adjacent to and within one-half mile in proximity of LMI geographies. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the assessment areas, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. The bank had one branch in a low-income CT, which was well below the population percentage. Consideration was given to two branches in middle-income geographies were near low-income CTs as described above. The bank had five branches in moderate-income CTs within this AA, which was near to the population percentage. Consideration was given to five branches in middle- and upper-income geographies that were near moderate-income CTs as described above.

Branch openings and closings have not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. The bank opened eight and closed seven branches in the AA during the evaluation period. Two branches were opened in moderate-income CTs as well as four in middle-income CTs and two in upper-income CTs. Two branches in moderate-income CTs and four in middle-income CTs were closed due to periodic analysis of the branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance. Additionally, one branch in a moderate-income CT was closed due to the bank's strategic decision to exit its branches located in retirement centers.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

HNB's performance in providing CD services in the Youngstown MMSA is excellent. The bank is a leader in providing community development services. Eighty-nine employees participated in 364 CD activities with 38 organizations, totaling 1,974 hours, which included 14 leadership positions. The bank's efforts demonstrated excellent responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups, low- and moderate-income persons and families, and small businesses. Employees provided 594 hours of overall BOD and Loan Committee involvement to economic development, affordable housing, community service and revitalization organizations. A significant effort focused on affordable housing, another identified community need. Volunteers provided assistance in submitting FHLB AHP grant submissions for five organizations and provided Board Services to three affordable housing organizations. FHLB grant submission assistance included grants for 76 units of affordable housing, a grant to build an affordable housing shelter for battered families, and an affordable housing grant to rehab LMI homes. Revitalization is another identified community need. Volunteers provided 95 hours of BOD service to organizations with a revitalization and stabilization focus.

One employee provided 96 hours of technical financial assistance and service on the Board of both Trumbull Neighborhood Partnership (TNP) and Trumbull County Land Revitalization Corporation (TCLRC), also known as the Land Bank. TNP is a CDC neighborhood development, with a mission to empower residents and promote sustainable community development through projects and programs. TNP partnered with TCLRC to address residential vacancy and to facilitate affordable housing through property rehab and acquisition.

One employee provided 43 hours of Board service and financial expertise to Youngstown Business Incubator. This organization helps meet the credit needs of small businesses and supports economic development by accelerating the successful development of start-up and companies.

State Rating

State of Florida

CRA Rating for Florida:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- The bank's overall lending activity is excellent, considering strong competition and limited bank operations in the Naples AA.
- The overall geographic distribution of the bank's lending is adequate, considering the impact of the limited volume of bank loans on lending distributions. Home mortgage performance was adequate while small loans to businesses performance, with limited volume, was poor.
- The overall distribution of loans by borrower income level and businesses of different income levels is adequate, considering the high cost of housing and limited loan volume. Adequate home mortgage loan distribution was augmented by good small loans to businesses distribution.
- Qualified investment activity is excellent and generally responsive to identified needs.
- Delivery systems are reasonably accessible to essentially all geographies and individuals of different incomes. The bank provides an excellent level of CD services.

Description of Institution's Operations in Florida

HNB's assessment area in Florida consists of the one entire county that defines the Naples-Marco Island MSA; Collier County. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

HNB had one branch within the MSA, representing 0.1 percent of the bank's total branch network. As of June 30, 2015, the bank ranked 31st within the MSA in total deposits with 0.4 percent market share. HNB's deposits totaled \$50 million. Based on deposits, Florida was HNB's smallest rating area, ranked 10th, and accounted for approximately 0.1 percent of total bank deposits. During the evaluation period, HNB originated 0.1 percent of its total reportable HMDA loans and 0.03 percent of its small loans to businesses within the MSA.

Competition is strong as there are 38 insured institutions operating 159 offices in an area with a population of just over 321,000 as of the 2010 Census. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 530 lenders originated home mortgage loans in the AA during 2014. Deposit competitors include Fifth Third Bank, Wells Fargo Bank, and Keycorp.

Refer to the market profiles in the Florida section of appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews. The median housing value reflected in the market profile data indicates the AA is a high cost area, with limited affordability of housing for LMI residents.

Scope of Evaluation in Florida

We evaluated the bank's performance in the Naples AA using full-scope procedures, which is also the basis for our ratings of this area. This AA accounts for \$50 million and 0.1 percent of total bank deposits. For the evaluation period, the AA loan volume was 0.1 percent. Please refer to appendix A for additional information regarding area that received the full-scope review.

The bank did not originate or purchase a sufficient volume of home improvement or small loans to farms during the evaluation period to perform a meaningful analysis.

In drawing conclusions relative to the bank's performance, we considered community information obtained by the OCC and the bank. In Florida, we met with an affordable housing organization and a human services organization, located in Naples. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

The bank's performance under the Lending Test in Florida is rated "Low Satisfactory." Based on the full-scope review, the bank's performance in the Naples AA is adequate. In performing our analysis, we placed greater weight on the bank's home mortgage loan performance, as it represented the majority of the bank's reportable lending activity. We also considered the extremely high cost of housing in the AA.

Lending Activity

Refer to Table 1 Lending Volume in the Florida section of appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall lending activity is excellent, considering the strong competition for all types of loans in the Naples AA. The total dollar volume of lending significantly exceeded local deposits in the AA.

HNB's lending activity in the Naples AA is excellent. Based on FDIC Deposit Market Share data as of June 30, 2015, HNB achieved 0.4 percent market share of deposits, ranking 31st among 38 financial institutions in the AA. Based on 2014 Peer Mortgage Data, HNB achieved a 0.3 percent market share of home purchase loans, ranking 59th among 468 reporting lenders. The bank does not have any lending market share in home improvement loans, among 38 reporting lenders. The bank achieved 0.5 percent market share of home refinance loans, ranking 35th among 304 reporting lenders.

HNB achieved a 0.06 percent market share of small loans to businesses, ranking 40th among 111 reporting lenders. The small business lending activity is excellent given the bank's market share and ranking when compared to the deposit market share and small business lending competition within the AA. The top five lenders for small business lending consisted of the nation's largest credit card lenders, which collectively held 66.7 percent of the market share.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending is adequate. Adequate home mortgage performance was negatively impacted by poor small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Overall, the geographic distribution of home mortgage loans is adequate. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall geographic distribution of home purchases loans is adequate. The percentage of loans in low-income geographies was below the percentage of owner-occupied units in these geographies. However, considering the limited volume of home purchases loans in the AA, the bank would have achieved a comparable percentage with one additional loan in a low-income geography. The percentage of loans in moderate-income geographies significantly exceeded the percentage of owner-occupied units in these geographies. The bank did not achieve a market share in low-income geographies. The market share in moderate-income geographies was well below the overall market share.

The overall geographic distribution of home refinance loans is adequate. The percentage of loans in low-income geographies exceeded the percentage of owner-occupied units in these geographies. The portion of loans made in moderate-income census tracts was below the percentage of owner-occupied units in these geographies. The bank did not achieve a market share in low-income geographies. The market share in moderate-income geographies was well below the overall market share.

Small Loans to Businesses

Refer to Table 6 in the Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is poor. The bank did not originate or purchase any small loans to businesses in low-income geographies. The percentage of loans made in moderate-income geographies was significantly below the percentage of businesses in those geographies. The bank did not achieve a market share in moderate-income geographies. However, considering the very limited volume of small loans to businesses in the AA, the bank would have exceeded the percentage of small business with a

single loan in a low-income geography and achieved a comparable percentage with two additional loans in moderate-income geographies.

Lending Gap Analysis

We reviewed summary reports and maps, and analyzed HNB's home mortgage and small business lending activity over the evaluation period, to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of the bank's lending is adequate. Adequate home mortgage performance was augmented by good small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the Florida 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.

Overall, the borrower distribution of home mortgage loans is adequate. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall borrower distribution of home purchase loans is adequate. The percentage of loans to both low- and moderate-income borrowers was well below the percentage of corresponding families. The bank did not achieve a market share to low-income borrowers. The bank's market share to moderate-income borrowers exceeded the overall market share. The performance is considered adequate as a result of the constraints on home purchase lending to LMI borrowers as a result of the high cost of housing. The median housing value reflected in the Florida section of appendix C is 12 times the low-income threshold, and eight times the moderate-income threshold. This indicates homes are substantially unaffordable to LMI borrowers.

The overall borrower distribution of home refinance loans is adequate. The percentage of loans to both low- and moderate-income borrowers was significantly below the percentage of corresponding families. The bank's market share to low-income borrowers exceeded the overall market share. The bank's market share to moderate-income borrowers was below the overall market share. Given the lack of housing affordability, the opportunities to refinance loans is limited by the number of LMI homeowners, as reflected by LMI market share performance, which was not significantly different from overall market share.

Small Loans to Businesses

Refer to Table 11 in the Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is good when considering market share performance. The percentage of small loans to small businesses was below the percentage of small businesses. The bank's market share of small loans to small businesses exceeded the overall market share of small loans to businesses.

Community Development Lending

Refer to Table 1 Lending Volume in the Florida section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending had a neutral impact on the overall lending performance in the Naples AA, considering the limited bank operations in the AA. The bank did not originate any CD loans in the AA during the evaluation period.

Product Innovation and Flexibility

The bank's loan product flexibility had a neutral impact on lending performance in the Naples AA. HNB offers a Federal Housing Authority (FHA) fixed rate residential mortgage product. The FHA mortgage allows for a low down payment and includes a low minimum credit score. The FHA mortgage can also be used in conjunction with Section 8 Homeownership vouchers. The bank made two loans for a total of \$608,000 in the Naples AA during the evaluation period.

INVESTMENT TEST

The bank's performance under the Investment Test is rated "Outstanding." Based on full-scope review, the bank's performance in the Naples MSA is excellent.

Refer to Table 14 in the Florida section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, HNB made two investments in the Naples MSA totaling \$1 million. In addition, one prior period investments with a total book value of \$55,000 remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$1.1 million represented 19.9 percent of the Tier One Capital allocated to the AA. The bank's responsiveness to the identified needs of the AA is adequate, when taking into consideration the bank's presence in the AA. In terms of dollar volume, 94.6 percent of the bank's investments, donations, and grants were allocated to community service.

Refer to Table 14 in the Florida section of appendix D for the facts and data that supports this conclusion.

SERVICE TEST

The bank's performance under the Service Test in the State of Florida is rated "Low Satisfactory." Based on a full-scope review of the Naples AA, the bank's performance is adequate.

Retail Banking Services

Refer to Table 15 in the Florida section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB's branch is reasonably accessible to geographies and individuals of different income levels in the AA given the bank's very limited presence in the AA. HNB's only branch in this AA is located in an upper-income CT. With its very limited presence in the market, HNB's office is considered adequate for delivering retail-banking services. In drawing conclusions, consideration was given to the bank's local focus of serving its wealth management customers, and that the area is served by many other financial institutions, as discussed in the market profile section in appendix C.

Branch openings and closings have generally not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. During the evaluation period, one branch located in an upper-income geography was closed.

The bank's branch office hours and the level of services available are adequate. In addition to offering Monday through Friday banking hours, branch personnel are available for appointments outside the standard service hours. There are no HNB ATMs serving the AA, but product offerings and telephone and Internet banking provide alternative delivery systems that allow customers to access their accounts outside of regular banking hours.

Community Development Services

HNB's performance in providing CD services in the Naples MSA is adequate. The bank demonstrates an adequate level of providing community development services given the bank's limited presence in the AA. HNB has one branch in Naples. Three employees participated in 15 CD activities with five organizations, totaling 99 hours, which included one leadership position. The bank's efforts demonstrated adequate responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups and low- and moderate-income persons and families. Efforts in financial education, an identified community need, included providing 51 hours of financial education to three organizations. Community services also included 23 hours of employees serving on the board of directors for community service organizations.

Employees provided 51 hours of financial literacy classes at Lely High School where 69 percent of students qualify for free and reduced lunch; Mike David Elementary where 94 percent of students qualify for free and reduced lunch; and Naples Park Elementary where 64 percent of the students qualify for free and reduced lunch.

State of Indiana

CRA Rating for Indiana:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Overall geographic distribution of loans is good, as evidenced by both good home mortgage and small loans to businesses performance.
- Overall borrower distribution of loans is excellent, as evidenced by both excellent home mortgage and small loans to businesses performance.
- CD lending had a significantly positive impact on overall lending performance and was responsive to identified needs.
- Qualified investment activity is excellent, and generally responsive to identified needs.
- Delivery systems are accessible to essentially all geographies and individuals of different income levels. The bank is a leader in providing CD services.

Description of Institution's Operations in Indiana

HNB has 49 branches within Indiana, offering its full range of residential, consumer, and commercial financial products and services. Indiana is HNB's third largest rating area based on deposits and sixth by reported loans. Deposits totaling \$3.2 billion within the state represent approximately 5.9 percent of the bank's total deposits, while 4.6 percent of HNB's reported loans are from Indiana.

HNB had four AAs in Indiana during the evaluation period. HNB's Indianapolis AA is the bank's primary market area and consists of six of the ten entire counties that comprise the Indianapolis-Carmel-Anderson MSA; Boone, Hamilton, Hendricks, Johnson, Madison, and Marion Counties. The Indianapolis-Carmel MSA has 45 branch offices. HNB's Lafayette AA consist of Tippecanoe County. The Lafayette AA has four branches and 3.9 percent of the state's deposit. During the period 2012 through 2013 HNB included Madison County (Anderson AA), and Allen County (Fort Wayne AA) in its AAs in Indiana. The Fort Wayne AA was removed at the end of 2013 due to branch closures in the AA. In addition, based on the 2014 OMB changes, the Anderson AA was consolidated into the Indianapolis MSA.

Competition is strong as there are 40 insured institutions operating 504 offices in an area with a population of 1.7 million as of the 2010 Census. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 470 lenders originated home mortgage loans in the AA during 2014. Deposit competitors include JPMorgan Chase Bank, PNC Bank, and Fifth Third Bank.

Refer to the market profiles for the Indiana in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Indiana

The Indianapolis AA was selected for a full-scope review. This AA accounts for \$3 billion in deposits, 94.7 percent of rating area deposits, and 5.6 percent of total bank deposits. For the evaluation period, AA loan volume was 80 percent of rating area lending, and 3.7 percent of total reported loans. Performance in the Anderson, Fort Wayne, and Lafayette-West Lafayette AAs was assessed using limited-scope procedures. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

The bank did not originate or purchase a sufficient volume of small loans to farms in the Indianapolis AA during either analysis period to perform a meaningful analysis. Additionally, the bank did not originate or purchase a sufficient volume of home purchase, home improvement, or small loans to farms in the Anderson and Fort Wayne AAs to perform a meaningful analysis.

Indiana ratings are based primarily on conclusions reached for performance in the Indianapolis AA where we used full-scope procedures. In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC. In conjunction with this evaluation, we met or reviewed previous community contact interviews with a housing and community development organization located in Indianapolis, an affordable housing organization located in Morgan County, and an economic development organization located in Indianapolis. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Indiana is rated "Outstanding." Based on the full-scope review, the bank's performance in the AA is excellent. In performing our analysis, we placed greater weight on the bank's home mortgage loan performance, as it represented the majority of the bank's reportable lending activity. Additionally for the geographic distribution and borrower income distribution analysis, we placed greater weight on the bank's performance in 2014 through 2015 than 2012 through 2013.

Lending Activity

Refer to Table 1 Lending Volume in the Indiana section of appendix D for the facts and data used to evaluate the bank's lending activity.

HNB's lending activity in Indianapolis AA is excellent. Based on FDIC Deposit Market Share data as of June 30, 2015, HNB achieved a 7.6 percent market share of deposits, ranking fourth among 40 financial institutions in the AA, and ranking them in the top 10 percent of total depository banks. Based on 2014 Peer Mortgage Data, HNB achieved a 2.6 percent market share of home purchase loans, ranking seventh among 417 reporting lenders and the

equivalent to being in the top 1.7 percent of lenders. The bank achieved a 3.2 percent market share of home improvement loans, ranking eighth among 136 reporting lenders and the equivalent to being in the top 5.9 percent of lenders. The bank also achieved a 2.7 percent market share of home refinance loans, ranking 11th among 357 reporting lenders and is equivalent to being in the top 3.1 percent of lenders. Given the competition from the other reporting lenders in the AA and the bank's higher lender rankings for each product, overall home mortgage lending activity is excellent.

HNB achieved a 3.8 percent market share of small loans to businesses, ranking seventh among 105 reporting lenders, or the top 8.2 percent of lenders. The small business lending activity is excellent given the bank's market share and ranking when compared to the deposit market share and small business lending competition within the AA. The top five lenders for small business lending consisted of the nation's largest credit card lenders, which collectively had 59.9 percent of the market share.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending is good.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Overall, the geographic distribution of home mortgage loans is good.

The overall geographic distribution of home purchases loans is good when considering performance in 2012 through 2013. The bank's geographic distribution of home purchase loans during 2014 through 2015 was excellent when considering market share performance. The percentage of loans in low-income geographies was below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in both low- and moderate-income census tracts exceeded its overall market share for home purchase loans. The bank's performance in 2012 through 2013 was weaker than the performance noted in 2014 through 2015, and was adequate when considering market share performance. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families. The percentage of loans to moderate-income borrowers was well below the percentage of moderate-income families. The bank's market share to low-income borrowers exceeded the overall market share. The bank's market share to moderate-income borrowers was somewhat near to the bank's overall market share. This performance had a negative impact on the overall home purchase loan conclusion.

The overall geographic distribution of home improvement loans is good. The bank's geographic distribution of home improvement loans during 2014 through 2015 was good. The percentage of loans in low-income geographies was below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies substantially met the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts was well below its overall market share for home

improvement loans. The bank's market share in moderate-income census tracts exceeded its overall market share for home improvement loans. HNB's performance in 2012 through 2013 was consistent with the performance noted in 2014 through 2015.

The overall geographic distribution of home refinance loans is good when considering performance in 2012 through 2013. The bank's geographic distribution of home refinance loans during 2014 through 2015 was excellent when considering market share performance. The percentage of loans in low-income geographies was below the percentage of owner-occupied units in these geographies. The portion of loans made in moderate-income census tracts exceeded the percentage of owner-occupied units in these geographies. The bank's market share in both low- and moderate-income census tracts exceeded its overall market share for home refinance loans. The bank's performance in 2012 through 2013 was weaker than the performance noted in 2014 through 2015, and was adequate when considering market share performance. The percentage of loans was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was well below the percentage of owner-occupied units in these geographies. The bank's market share in both low- and moderate-income geographies exceeded the bank's overall market share. This performance had a negative impact on the overall home refinance loan conclusion.

Small Loans to Businesses

Overall, the geographic distribution of small loans to businesses is good.

Refer to Table 6 in the Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The bank's geographic distribution of small loans to businesses in 2014 through 2015 was good when considering market share performance. The percentage of loans made in both low- and moderate-income geographies was below the percentage of businesses in those geographies. The bank's market share in both low- and moderate-income geographies was near to its overall market share for small loans to businesses. The bank's performance in 2012 through 2013 was consistent with performance noted in 2014 through 2015.

Lending Gap Analysis

We reviewed summary reports and maps, and analyzed HNB's home mortgage and small business lending activity over the evaluation period, to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of the bank's lending is excellent.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the Indiana 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.

Overall, the borrower distribution of home mortgage loans is excellent.

The overall borrower distribution of home purchase loans is excellent. The bank's borrower distribution of home purchase loans in 2014 through 2015 was excellent. The percentage of loans to low-income borrowers was considered good. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers exceeded its overall market share of home purchase loans. The bank's performance in 2012 through 2013 was weaker than the performance in 2014 through 2015, and was considered good. The performance difference was due to weaker moderate-income market share performance. The bank's market share to moderate-income borrowers was below the overall market share. Performance in 2012 through 2013 was not significant enough to impact the overall home purchase loan conclusion.

The overall borrower distribution of home improvement loans is excellent. The bank's borrower distribution of home improvement loans in 2014 through 2015 was excellent when considering market share performance. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers exceeded its overall market share of home improvement loans. The bank's performance in 2012 through 2013 was weaker than performance in 2014 through 2015, and was considered good. The performance difference was due to weaker low-income market share performance. The low-income market share was below the overall home improvement market share. This performance was not significant enough to impact the overall home improvement conclusion.

The overall borrower distribution of home refinance loans is excellent. The bank's borrower distribution of home refinance loans in 2014 through 2015 was excellent when considering market share performance. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers substantially met the overall market share of refinance loans. The bank's market share of loans to moderate-income borrowers exceeded the overall market share of refinance loans. The bank's performance in 2012 through 2013 was weaker than the performance noted in 2014 through 2015 and was good. The performance difference was due to weaker moderate-income market share performance. The moderate-income market share was below the overall refinance loan market share. Performance in 2012 through 2013 was not significant enough to impact the overall home refinance loan conclusion.

Small Loans to Businesses

Refer to Table 11 in the Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is excellent. The bank's borrower distribution of small loans to businesses in 2014 through 2015 was excellent when considering market share performance. The percentage of small loans to small businesses was near to the percentage of small businesses. The bank's market share of loans to small businesses exceeded its overall market share of loans to businesses. The bank's performance in 2012 through 2013 was consistent with performance noted in 2014 through 2015.

Community Development Lending

Refer to Table 1 Lending Volume in the Indiana section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending was exceptionally strong, and had a significantly positive impact on the overall lending performance in the Indianapolis AA. This performance compensated for overall good retail lending performance. HNB originated 18 loans totaling \$90.2 million in qualified CD loans in the AA during the evaluation period. This volume represented 27.7 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated good responsiveness to AA needs. CD loans supported small businesses, affordable housing initiatives for LMI individuals, supported community service organizations in the AA, and activities that promoted revitalized or stabilized LMI geographies in the AA.

An example of the CD loans originated during this evaluation period include:

- A \$34 million loan to refinance a mixed-use 214-unit apartment building with ground-level retail space in a moderate-income census tract redevelopment area utilizing Tax Increment Financing (TIF) funds.

IN Statewide CD Loans

HNB also originated four CD loans in the greater statewide area totaling \$20.6 million during the evaluation period. These loans were originated outside of HNB's four Indiana AAs, with no purpose, mandate or function to serve any of the AAs, but are considered given CD lending performance in the AAs.

Product Innovation and Flexibility

The bank's loan product flexibility had a positive impact on lending performance. HNB offers the following flexible loans programs targeted to LMI borrowers.

Community Access Mortgage (CAM) is an affordable housing program offered by HNB that is designed to provide a competitively priced mortgage program for LMI individuals or families or for properties in LMI geographies. The program features up to a 97 percent loan-to-value for purchase transactions without requiring mortgage insurance. Borrowers are required to provide a \$500 down payment from their own funds. The bank made 17 loans for a total of \$1.4 million in the Indianapolis AA during the evaluation period.

HNB offers a Federal Housing Authority (FHA) fixed rate residential mortgage product. The FHA mortgage allows for a low down payment and includes a low minimum credit score. The FHA mortgage can also be used in conjunction with Section 8 Homeownership vouchers. The bank made 1,073 loans for a total of \$127.5 million in the Indianapolis AA during the evaluation period.

HNB HomeTown Mortgage is an affordable housing program offered by the bank that is designed to provide a competitively priced mortgage program. The program features up to a 97 percent loan-to-value for purchase transactions without requiring mortgage insurance. Additionally, the program allows for a minimum credit score of 580. The bank made 316 loans for a total of \$37.5 million in the Indianapolis AA during the evaluation period.

HNB offers a United States Department of Agriculture (USDA) Rural Development Housing Loan Program. The program features a low minimum credit score and up to 100 percent financing. The bank made 31 loans for a total of \$2.9 million in the Indianapolis AA during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, HNB's performance under the Lending Test in the Anderson, Fort Wayne, and Lafayette AAs is weaker than the bank's overall "Outstanding" performance in the state. In the Anderson AA, weaker performance was due to weaker geographic and borrower income distribution. In the Fort Wayne AA, the performance difference was due to weaker geographic distribution. In the Lafayette AA, weaker performance was due to significantly less CD lending. Performance in the limited-scope areas was not significant enough to impact the Lending Test rating in the state. Refer to the Tables 1 through 12 in the Indiana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test is rated "Outstanding." Based on full-scope review, the bank's performance in the Indianapolis AA is excellent.

Refer to Table 14 in the Indiana section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, HNB made 73 investments, donations, and grants in the Indianapolis AA totaling \$18.8 million. This consisted of 14 investments totaling \$18.4 million, with 59 donations and grants totaling over \$369,000. In addition, 14 prior period investments with a total book value of \$5.1 million remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$23.9 million represented 7.3 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified needs of the AA is adequate, with affordable housing needs especially addressed. In terms of dollar volume, 95.9 percent of the bank's investments, donations, and grants were allocated to affordable housing.

Conclusions for Area Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the Investment Test in the Anderson, Fort Wayne, and Lafayette AAs is weaker than the bank's "Outstanding" performance under the Investment Test in Indiana, due to the lower level of investments. This performance did not have an impact on the Investment Test rating in the state, considering more limited opportunities in those smaller AAs for qualified investments.

Refer to Table 14 in the Indiana section of appendix D for the facts and data that supports this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

HNB's performance under the Service Test in the State of Indiana is rated "High Satisfactory." Based on a full-scope review of the Indianapolis AA the bank's performance is good.

Retail Banking Services

Refer to Table 15 in the Indiana section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB's branch distribution in the Indianapolis AA is good when considering branches near LMI geographies. Branches are accessible to essentially all portions of the AA. Primary consideration was given to HNB's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in middle- or upper-income geographies that border LMI geographies, or are adjacent to and within one-half mile proximity to LMI geographies. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the assessment areas, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. Our analysis took into consideration the impact the CT income designation changes, reflected in appendix C, had on the overall branch distribution. The bank had two branches in low-income CTs in the AA and the percentage of bank branches in low-income CTs was well below the percentage of population living in low-

income CTs. One branch in a middle-income CT that was near a low-income CT, as described above. The bank had 11 branches in moderate-income geographies. The percentage of branches in moderate-income CTs was good as it approximated the percentage of the population in moderate-income geographies.

Branch openings and closings have generally not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals, although they adversely affected the distribution of branches discussed above. During the evaluation period the bank opened one branch in a moderate-income geography, as well as one branch each in a middle- and an upper-income CT. One branch in a moderate-income CT was closed in the Anderson Indiana AA due to periodic analysis of branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance. This AA was subsequently merged into the Indianapolis AA due to OMB changes effective in 2014. The bank closed two other branches each in low- and moderate-income CTs and one branch in an upper income CT due to this analysis. The closing in the low-income CTs represented half of the branches that were in low-income geographies.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

HNB's performance in providing CD services in the Indianapolis AA is excellent. The bank is a leader in providing community development services. Ninety-eight employees participated in 409 CD activities with 52 organizations, totaling 2,906 hours, which included 19 leadership positions. The bank's efforts demonstrated excellent responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups, low- and moderate-income persons and families, and small businesses. A significant effort focused on revitalization and economic development, two identified community needs. Volunteers provided 120 hours in a board of director capacity for organizations with a revitalization and stabilization focus. Volunteers also provided 84 hours in a board of director capacity for qualifying economic development organizations. Additionally, one volunteer led a community group in creating a plan to attract businesses and investments to the community. Employees provided 94 hours of board and technical assistance to organizations with an Affordable Housing focus, including assistance with an FHLB AHP grant submission for one organization. Bank employees also provided 877 hours of free tax preparation for LMI persons.

One employee provided Board services to Indianapolis Neighborhood Housing Partnership (INHP). As one of the Board roles, this colleague served on the Homeowner Development Committee establishing product guidelines for Low- to Moderate-Income homebuyers. Per

bank-provided information, INHP has created a zero interest, deferred loan available to buyers who are purchasing a Neighborhood Stabilization Program home from participating Community Development Corporations (CDCs). This loan can be used in conjunction with an INHP first mortgage or with a first mortgage from an INHP lender partner. This INHP loan must be used for home exterior modifications/improvements. HNB was one of only four banks to participate the housing repair program.

One employee provided 62 hours of Board service as a member of the loan review committee for the Indiana Statewide Certified Development Corp, Indiana's largest lender for the U.S. Small Business Administration 504 loan program.

Conclusion for Area Receiving Limited-Scope Review

Based on a limited scope review, the bank's performance under the Service Test in the Lafayette AA was consistent the bank's overall "High Satisfactory" performance under the Service Test in Indiana. Although the percentage distribution of branches was significantly exceed the percentage of population in LMI geographies, the bank operated only 4 branches in the entire AA. Service Test performance was not analyzed separately in the Anderson AA, as the AA was consolidated into the Indianapolis AA as a result of OMB MSA delineation changes. Service Test performance was not analyzed in the Fort Wayne AA, as the branch was closed well before the end of the evaluation period. The closure had minimal impact on the availability of services in the AA as a result of the limited presence. Performance in the limited-scope AAs did not have an impact on the Service Test rating in the state. Refer to Table 15 in the Indiana section of Appendix D for the facts that support these conclusions.

State of Michigan

CRA Rating for Michigan:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Overall geographic distribution is adequate. Home mortgage performance was adequate, and small loans to businesses performance was excellent.
- Overall borrower distribution is good, as evidenced by overall good home mortgage and small loans to businesses performance.
- HNB's CD lending is exceptionally strong and had a significantly positive impact on overall lending performance. CD loans demonstrated excellent responsiveness to AA needs.
- Overall investment performance is excellent and responsive to identified needs.
- Delivery systems are accessible to essentially all geographies and individuals of different income levels. The bank is a leader in providing CD services.

Description of Institution's Operations in Michigan

HNB has 230 offices in Michigan, offering its full range of residential, consumer, and commercial financial products and services. Michigan is HNB's second largest rating area based on deposits and reported loans. Deposits totaling \$9.5 billion within the state represent 17.6 percent of the bank's total deposits, while 21.5 percent of HNB's reported AA loans are from Michigan. While HNB is one of the larger financial institutions operating in Michigan based on deposits, its overall statewide deposit market share is less than five percent.

HNB has 17 Assessment Areas in Michigan. Offices are located in 14 MSAs, 2 MDs, and 23 Non-MSA counties within the state. Two AAs are within the Detroit-Warren-Livonia MSA, which is divided into two MDs, the Detroit-Livonia-Dearborn MD (Detroit AA), and the Warren-Farmington Hills-Troy MD (Warren AA). Performance within the Warren and Detroit AAs are analyzed separately. The 23 Non-MSA counties are combined to form a single AA. HNB's primary market areas in the state are within the Detroit AA, the Warren AA, and the combined non-MSA counties (MI non-MSA AA). Sixty-five offices with deposits totaling \$4.7 billion are located within the Warren AA, 23 offices with deposits of \$479 million are located within the Detroit AA, and 43 offices with deposits of \$1.1 billion are located within the MI non-MSA AA. The bank also has AAs within the following MSAs in Michigan: Bay City, Niles-Benton Harbor, Battle Creek, Lansing-East Lansing, Flint, Jackson, Kalamazoo-Portage, Grand Rapids-Wyoming, Midland, Monroe, Muskegon, Saginaw, and Ann Arbor. The bank also has one AA located in Cass County, MI, on the Michigan side of the South Bend-Mishawaka, IN-MI MMSA.

HNB's AAs and branch network in Michigan were impacted by merger and acquisition activity, branch openings/closings, and OMB changes during the evaluation period. As a result of OMB changes, Ionia County in the Grand Rapids AA was re-designated as a non-MSA county. As a result of merger and acquisition activity or branch openings, the following counties (AAs) were added: Washtenaw County (Ann Arbor AA), Calhoun County (Battle Creek AA), Bay County (Bay City AA), Genesee County (Flint AA), Jackson County (Jackson AA), Clinton, Eaton, and Ingham Counties (Lansing AA), Midland County (Midland AA), and Saginaw County (Saginaw AA). In the MI Non-MSA, HNB added Alpena, Branch, Gratiot, Ostego, Shiawassee, St. Joseph, and Wexford Counties.

As a result of branch openings and closings, and corporate activity, HNB realized a net increase of 83 branches in Michigan during the evaluation period. HNB increased the number branches in full-scope AAs by 27, and in limited-scope AAs by 56. Refer to table 15 in appendix A for details on the bank's branch openings and closings for each AA.

Please refer to the market profiles for Michigan in appendix C for detailed demographics and other performance context information for the AAs that received full-scope reviews. Refer to appendix A for the detail of counties that comprise the limited-scope AAs.

Scope of Evaluation in Michigan

For Michigan, the Detroit, Warren, and MI Non-MSA AAs were evaluated using full-scope procedures. These three AAs account for the majority of HNB market share in Michigan. The combined AAs account for \$6.3 billion in deposits, 66 percent of rating area deposits and 11.6 percent of total bank deposits. For the evaluation period, AAs loan volume was 59.9 percent of rating area loans and 12.8 percent of total reportable loans. The Ann Arbor, Battle Creek, Bay City, Flint, Grand Rapids-Wyoming, Holland, Jackson, Kalamazoo-Portage, Lansing-East Lansing, Midland, Monroe, Muskegon, Niles-Benton Harbor, Saginaw and South Bend AAs in Michigan were evaluated using limited-scope procedures. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

The bank did not originate or purchase a sufficient volume of home purchase or home refinance loans in the Bay City MSA, Midland MSA, or Saginaw AAs to perform a meaningful analysis. HNB did not originate or purchase a sufficient volume of home improvement loans for a meaningful analysis in the Ann Arbor MSA, Battle Creek MSA, Bay City MSA, Flint MSA, Jackson MSA, Kalamazoo MSA, Midland MSA, Niles MSA, Saginaw MSA, or South Bend AAs. The bank did not originate or purchase a sufficient volume of small loans to businesses in the Bay City MSA or Midland AAs to perform a meaningful analysis. Finally, the bank only originated or purchased a sufficient volume of small loans to farms in the Michigan non-MSA, Warren MD, Grand Rapids MSA, and Holland AAs to perform a meaningful analysis.

Michigan ratings are based primarily on conclusions reached for performance in the three AAs where we used full-scope procedures. In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC. In conjunction with this evaluation we met with or reviewed existing community contacts with a mental health organization located in Detroit, a community action agency located in Detroit, and a community development organization located in Grand Rapids. Refer to the market profiles in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Michigan is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Detroit AA is good, and in the Non-MSA and Warren AAs performance is excellent. In performing our analysis, we placed greater weight on the bank's home mortgage loan performance, as it represented the majority of the bank's reportable lending activity. Additionally for the geographic distribution and borrower income distribution analysis, we placed greater weight on the bank's performance in 2014 through 2015 than in 2012 through 2013 for the AAs that were impacted by the OMB changes.

Lending Activity

Refer to Table 1 Lending Volume in the Michigan section of appendix D for the facts and data used to evaluate the bank's lending activity.

Detroit MD

HNB's lending activity in the Detroit AA is excellent. Based on FDIC Deposit Market Share data as of June 30, 2015, HNB achieved a 1 percent market share of deposits, ranking eighth among 26 financial institutions in the AA, and ranking them in the top 31 percent of total depository banks. Based on 2014 Peer Mortgage Data, HNB achieved a 1.5 percent market share of home purchase loans, ranking 17th among 278 reporting lenders and the equivalent to being in the top 6.1 percent of lenders. The bank achieved a 1 percent market share of home improvement loans, ranking 28th among 113 reporting lenders and the equivalent to the top 24.8 percent of lenders. The bank also achieved a 0.9 percent market share of home refinance loans, ranking 19th among 300 reporting lenders and the equivalent to being in the top 6.3 percent of lenders. For home refinance loans, the top five lenders collectively had 47.5 percent of the total market share. Given the competition from the other reporting lenders in the AA and the bank's higher lender rankings for each product, overall home mortgage lending activity is excellent.

HNB achieved a 1.9 percent market share of small loans to businesses, ranking tenth among 84 reporting lenders, which is equivalent to the top 11 percent of lenders. The small business lending activity is excellent given the bank's market share and ranking when compared to the deposit market share and small business lending competition within the AA. The top five lenders for small business lending consisted of the nation's largest credit card lenders, which collectively had 61.4 percent of the market share.

Michigan non-MSA

HNB's lending activity in the MI non-MSA is good. Based on FDIC Deposit Market Share data as of June 30, 2015, HNB achieved a 9.4 percent market share of deposits, ranking third among 48 financial institutions in the AA, and ranking them in the top 6.3 percent of total depository banks. Based on 2014 Peer Mortgage Data, HNB had a market share of 3.3 percent for home purchase loans, ranking seventh among 361 reporting lenders and is equivalent to being in the top 1.9 percent of lenders. For home improvement loans, the bank ranked fourth among 142 lenders with a 4.7 percent market share, making them in the top 3

percent of lenders. For home refinance loans, the bank ranked third among 334 lenders, with a 5.8 percent market share and the equivalent of being in the top 0.9 percent of lenders.

HNB achieved a 2.9 percent market share of small loans to businesses, ranking eleventh among 80 reporting lenders. The top five lenders comprise 55.2 percent of the market share of small loans to businesses. For small loans to farms, the bank ranked ninth among 30 lenders with a 2.5 percent market share.

Warren MD

HNB's lending activity in the Warren AA is excellent. Based on FDIC Deposit Market Share data as of June 30, 2015, HNB achieved a 7 percent market share of deposits. This ranks the bank seventh among 42 financial institutions in the AA and in the top 16.7 percent of total depository banks. Based on 2014 Peer Mortgage Data, HNB had a market share of 2 percent for home purchase loans, ranking tenth among 417 reporting lenders and is equivalent to being in the top 2.4 percent of lenders. For home improvement loans, the bank ranked eighth among 177 lenders with a 3.1 percent market share, placing them in the top 4.5 percent of lenders. For home refinance loans, the bank ranked 13th among 410 lenders, with a 1.5 percent market share and the equivalent of being in the top 3.2 percent of lenders.

HNB achieved a 2.2 percent market share of small loans to businesses, ranking tenth among 101 reporting lenders. The top five lenders comprise 64.5 percent of the market share of small loans to businesses. For small loans to farms, the bank ranked fifth among 21 lenders with a 5.1 percent market share.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending is adequate. Overall home mortgage performance was minimally adequate, and small loans to businesses performance was excellent. This small loans to businesses performance was not sufficient enough to impact the overall home mortgage performance.

Home Mortgage Loans

Overall, the geographic distribution of home mortgage loans is adequate. In performing our analysis, we placed greater emphasis on the bank's performance in the Warren AA, as it contains the largest volume of deposits, branches, and loan volume in the state.

Refer to Tables 2, 3, 4, and 5 in the Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Detroit MD

Overall, the geographic distribution of home mortgage loans is poor.

The overall geographic distribution of home purchases loans is poor. The percentage of loans in low-income geographies was well below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was significantly below the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts exceeded its overall market share for home purchase loans. The

bank's market share in moderate-income census tracts was significantly below its overall market share for home purchase loans.

The overall geographic distribution of home improvement loans is poor, considering the limited volume, where a single loan can significant impact distributions. The percentage of loans in both low- and moderate-income geographies was significantly below the percentage of owner-occupied units in those geographies. The bank's market share in low-income census tracts exceeded its overall market share for home improvement loans. The bank's market share in moderate-income census tracts was significantly below its overall market share for home improvement loans.

The overall geographic distribution of home refinance loans is adequate when considering market share performance. The percentage of loans in both low- and moderate-income geographies was significantly below the percentage of owner-occupied units in those geographies. The bank's market share in both low- and moderate-income geographies exceeded its overall home refinance market share.

Michigan non-MSA

Overall, the geographic distribution of home mortgage loans is adequate. In evaluating the geographic distribution of home loans in the Michigan Non-MSA, it is important to note that the AA's one low-income census tract contains a very low percent of owner-occupied housing units, at approximately 300 units, reflected in appendix C. Based on this data, we placed significantly more emphasis on performance in moderate-income geographies. We also considered the improving trend in lending distributions over the evaluation period. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall geographic distribution of home purchase loans is good when considering performance in 2012 through 2013. The bank's geographic distribution of home purchase loans during the 2014 through 2015 lending period was excellent. The bank did not originate or purchase any home purchase loans in the low-income geography. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these tracts. HNB's market share in the moderate-income census tracts was near to its overall market share for home purchase loans. The bank's performance in 2012 through 2013 was weaker than the performance noted in 2014 through 2015, and was considered very poor. The bank did not originate or purchase any home purchase loans in the low-income geography. The percentage of loans in moderate-income tracts was significantly below the percentage of owner-occupied units in these areas. The bank's market share in the moderate-income census tracts was below its overall market share. This performance had a negative impact on the overall home purchase conclusion.

The overall geographic distribution of home improvement loans is adequate when considering improvement in performance over the evaluation period. The bank's geographic distribution of home improvement loans during the 2014 through 2015 lending period was adequate. The bank did not originate or purchase any home purchase loans the low-income geography. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these tracts. The bank's market share in the moderate-income census tracts was well below its overall market share for home purchase loans. The bank's performance in 2012 through 2013 was weaker than the performance noted in 2014 through 2015, and was

considered very poor. The bank did not originate or purchase any home purchase loans in the low-income geography. The percentage of loans in moderate-income tracts was significantly below the percentage of owner-occupied units in these areas. HNB's market share in moderate-income census tracts was significantly below its overall market share for home improvement loans. This performance had a negative impact on the overall home improvement conclusion, but the improving trend was considered positively.

The overall geographic distribution of home refinance loans is adequate when considering improvement in performance over the evaluation period. The bank's geographic distribution of home refinance loans during 2014 through 2015 was adequate. The bank did not originate or purchase any home purchase loans in the low-income geography. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these tracts. The bank's market share in moderate-income census tracts was near to its overall market share for home refinance loans. The bank's performance in 2012 through 2013 was weaker than the performance noted in 2014 through 2015, and was very poor. The bank did not originate or purchase any home purchase loans in the low-income geography. The percentage of loans in moderate-income tracts was significantly below the percentage of owner-occupied units in these areas. The bank's market share in the moderate-income census tracts was below its overall market share for home refinance loans. This performance had a negative impact on the overall home refinance conclusion, but the improving trend was considered positively.

Warren MD

Overall, the geographic distribution of home mortgage loans is adequate.

The overall geographic distribution of home purchase loans is adequate. The percentage of loans in low-income geographies was well below the percentage of owner-occupied units in these tracts. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these tracts. HNB's market share in the low-income census tracts approximated its overall market share for home purchase loans. The bank's market share in the moderate-income census tracts was near to its overall market share for home purchase loans.

The overall geographic distribution of home improvement loans is adequate. The percentage of loans in both low- and moderate-income geographies was below the percentage of owner-occupied units in those tracts. HNB's market share in low-income census tracts exceeded its overall market share for home improvement loans. The bank's market share in moderate-income census tracts was below its overall market share for home improvement loans.

The overall geographic distribution of home refinance loans is adequate when considering market share performance. The percentage of loans in low-income geographies was significantly below the percentage of owner-occupied units in these tracts. The percentage of loans in moderate-income geographies was well below the percentage of owner-occupied units in these tracts. HNB's market share in both low- and moderate-income census tracts exceeded its overall market share for home refinance loans.

Small Loans to Businesses

Overall, the geographic distribution of small loans to businesses is excellent.

Refer to Table 6 in the Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Detroit MD

The overall geographic distribution of small loans to businesses is excellent when considering market share performance. The percentage of loans made in low-income geographies was below the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies exceeded the percentage of businesses in those geographies. The bank's market share in both low- and moderate-income geographies exceeded its overall market share for small loans to businesses.

Michigan non-MSA

The overall geographic distribution of small loans to businesses is excellent. In evaluating the geographic distribution of small loans to businesses, it is important to note that the AA's one low-income census tract contains a very low percent of businesses, at just under 400 businesses, reflected in appendix C. Based on this data, we placed significantly more emphasis on performance in moderate-income geographies. The bank's geographic distribution of small loans to businesses in 2014 through 2015 was excellent. The percentage of loans made in the low-income geography was significantly below the percentage of businesses in that geography. The percentage of loans made in moderate-income geographies exceeded the percentage of businesses in those geographies. The bank did not achieve a market share in the low-income geography. The bank's market share in moderate-income census tracts exceeded its overall small loans to businesses market share. HNB's performance in 2012 through 2013 was consistent with performance noted in 2014 through 2015.

Warren MD

The overall geographic distribution of small loans to businesses is excellent. The percentage of loans made in both low- and moderate-income geographies exceeded the percentage of businesses in those geographies. Additionally, the bank's market share in both low- and moderate-income geographies exceeded its overall market share for small loans to businesses.

Small Loans to Farms

Overall, the geographic distribution of small loans to farms is adequate.

Refer to Table 7 in the Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Michigan non-MSA

HNB's overall geographic distribution of small loans to farms is adequate when considering performance in 2012 through 2013. In evaluating the geographic distribution of small loans to farms, it is important to note that the AA's one low-income census tract contains 2 farms, with 202 farms in the moderate-income geographies. The bank's geographic distribution of small loans to farms in 2014 to 2015 was good. The bank did not originate or purchase any small loans to farms in the low-income geography. The percentage of loans made in moderate-income geographies was below the percentage of farms in those geographies. The bank's market share in moderate-income census tracts exceeded its overall market share for small loans to farms. HNB's performance in 2012 through 2013 was weaker than its performance in 2014 through 2015, and was considered poor. The bank did not originate or purchase any small loans to farms in the low-income geography. The percentage of loans made in moderate-income geographies was below the percentage of farms in these geographies. The bank did not achieve a market share in moderate-income geographies. This performance had a negative impact on the overall small loans to farms conclusion, although the improving trend was considered positively.

Warren MD

The overall geographic distribution of HNB's small loans to farms is adequate. The percentage of loans made in low-income geographies exceeded the percentage of farms in these geographies. The percentage of loans in moderate-income geographies was significantly below the percentage of farms in those geographies. The bank's market share in low-income census tracts exceeded the bank's overall market share for small loans to farms. The bank did not achieve a market share in moderate-income geographies.

Lending Gap Analysis

We reviewed summary reports and maps, and analyzed HNB's home mortgage and small business lending activity over the evaluation period, to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of the bank's lending is good, as evidenced by overall good home mortgage and small loans to businesses performance.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is good.

Refer to Tables 8, 9 and 10 in the Michigan 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.

Detroit MD

Overall, the borrower distribution of home mortgage loans is poor.

The overall borrower distribution of home purchase loans is poor. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage

of loans made to moderate-income borrowers was near to the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was significantly below its overall market share of home purchase loans. The bank's market share of loans to moderate-income borrowers was well below its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is poor. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families. The percentage of loans made to moderate-income borrowers was below the percentage of moderate-income families. The bank did not achieve a market share in either low- or moderate-income geographies.

The overall borrower distribution of home refinance loans is poor. The percentage of loans to both low- and moderate-income borrowers was well below the percentage of low- and moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers was significantly below the overall market share of refinance loans.

Michigan non-MSA

Overall, the borrower distribution of home mortgage loans is excellent.

The overall borrower distribution of home purchase loans is good when considering performance in 2012 through 2013. The bank's borrower distribution of home purchase loans during the 2014 through 2015 lending period was excellent. The percentage of loans to low-income borrowers was considered good. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low-income and moderate-income borrowers exceeded its overall market share of home purchase loans. HNB's performance in 2012 through 2013 was weaker than the performance noted in 2014 through 2015, and was considered adequate. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. HNB's market share to low-income borrowers was well below its overall market share for home purchase loans. The bank's market share to moderate-income borrowers substantially met its overall market share. This performance had a negative impact on the overall home purchase conclusion.

The overall borrower distribution of home improvement loans is excellent. The bank's borrower distribution of home improvement loans during the 2014 through 2015 lending period was excellent. The percentage of loans to low-income borrowers substantially met the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low-income and moderate-income borrowers exceeded its overall market share of home purchase loans. HNB's performance in 2012 through 2013 was consistent with performance noted in 2014 through 2015.

The overall borrower distribution of home refinance loans is excellent. HNB's borrower distribution of home refinance loans during the 2014 through 2015 lending period was excellent. The percentage of loans to low-income borrowers was considered good. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income

borrowers exceeded the overall market share of refinance loans. HNB's performance in 2012 through 2013 was consistent with performance noted in 2014 through 2015.

Warren MD

Overall, the borrower distribution of home mortgage loans is good.

The overall borrower distribution of home purchase loans is good. The percentage of loans to low-income borrowers was considered good. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was below its overall market share of home purchase loans. The bank's market share of loans to moderate-income borrowers was near to its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers was considered good. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was well below its overall market share of home improvement loans. The bank's market share of loans to moderate-income borrowers exceeded its overall market share of home improvement loans.

The overall borrower distribution of home refinance loans is good. The percentage of loans to low-income borrowers was considered adequate. The percentage of loans to moderate-income borrowers approximated the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeded the overall market share of refinance loans. HNB's market share of loans to moderate-income was below the overall market share of refinance loans.

Small Loans to Businesses

The overall borrower distribution of small loans to businesses is good.

Refer to Table 11 in the Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Detroit MD

The overall borrower distribution of small loans to businesses is good when considering market share performance. The percentage of small loans to small businesses was below the percentage of small businesses. The bank's market share of small loans to small businesses exceeded its overall market share of small loans to businesses.

Michigan non-MSA

The overall borrower distribution of small loans to businesses is excellent. The bank's borrower distribution of small loans to businesses in 2014 through 2015 was excellent when considering market share performance. The percentage of small loans to small businesses was near to the percentage of small businesses. The bank's market share of small loans to small businesses exceeded its overall market share of small loans to businesses. The bank's performance in 2012 through 2013 was consistent with the performance noted in 2014 through 2015.

Warren MD

The overall borrower distribution of small loans to businesses is good when considering market share performance. The percentage of small loans to small businesses was below the percentage of small businesses. The bank's market share of small loans to small businesses exceeded its overall market share of small loans to businesses.

Small Loans to Farms

The overall borrower distribution of small loans to farms is excellent.

Refer to Table 12 in the Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Michigan non-MSA

HNB's overall borrower distribution of small loans to farms is excellent. The bank's borrower distribution of small loans to farms in 2014 through 2015 was excellent when considering market share performance. The percentage of small loans to small farms was near to the percentage of small farms in the AA. The bank's market share of small loans to small farms exceeded the bank's overall market share of small loans to farms. The bank's performance in 2012 through 2013 was consistent with the performance noted in 2014 through 2015.

Warren MD

The overall borrower distribution of small loans to farms is excellent. The bank's percentage of small loans to small farms substantially met the percentage of small farms in the AA. HNB's market share of small loans to small farms exceeded the overall market share of small loans to farms.

Community Development Lending

Refer to Table 1 Lending Volume in the Michigan section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Detroit MD

CD lending was exceptionally strong, and had a significantly positive impact on overall lending performance in the Detroit MD AA. This performance compensated for overall adequate retail lending performance. HNB originated 20 loans totaling \$117.7 million in qualified CD loans in the AA during the evaluation period. This volume represented 231 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated good responsiveness to AA needs. CD loans supported small businesses, affordable housing initiatives for LMI individuals, supported community service organizations in the AA, and activities that promoted revitalized or stabilized LMI geographies in the AA.

Specific examples of the CD loans originated during this evaluation period include:

- An \$11.2 million loan to construct a 161-unit LIHTC apartment complex located in a low-income census tract.
- A \$5.8 million loan to refinance and increase Detroit Investment Fund (CDFI) subordinate debt to fund tenant improvements and purchase the adjacent parking lot for commercial property located in a low-income census tract in Midtown Detroit.

Michigan non-MSA

CD lending was exceptionally strong, and had a significantly positive impact on overall lending performance in the Michigan Non-MSA. This performance compensated for overall good retail lending performance. HNB originated 47 loans totaling \$74.9 million in qualified CD loans in the AA during the evaluation period. This volume represented 63.9 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated good responsiveness to AA needs. CD loans supported small businesses, affordable housing initiatives for LMI individuals, and supported community service organizations in the AA.

Specific examples of the CD loans originated during this evaluation period include:

- A \$7.7 million loan to rehabilitate 112 multifamily affordable rental units and add a community building that will be operated under the restriction of LIHTC, USDA 515 program.
- A \$1.3 million loan to a nonprofit organization to construct a retail store located in a moderate-income census tract, which is expected to create 15 to 20 jobs for LMI individuals.

Warren MD

CD lending was exceptionally strong, and had a significantly positive impact on overall lending performance in the Warren MD AA. This performance compensated for overall good retail lending performance. HNB originated 40 loans totaling \$173.3 million in qualified CD loans in the AA during the evaluation period. This volume represented 34.8 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated good responsiveness to AA needs. CD loans supported small businesses, affordable housing initiatives for LMI individuals, supported community service organizations in the AA, and activities that promoted revitalized or stabilized LMI geographies in the AA.

Specific examples of the CD loans originated during this evaluation period include:

- A \$3 million loan to facilitate the acquisition of a wholesale supply company with 33 low- and moderate-income employees located in a moderate-income census tract.
- An \$8 million loan for rehabilitation of a 97-unit affordable housing LIHTC project. The borrower is a nonprofit organization that provides affordable housing and supportive services for elderly adults.

MI Statewide CD Loans

In addition to CD loans originated in AAs, HNB also made one CD loan totaling \$5 million in the greater statewide area that had a purpose, function or mandate to serve the AA(s). The bank also originated 38 loans totaling \$39.8 million in the greater statewide area with no purpose, function or mandate to serve any of the AA(s).

Product Innovation and Flexibility

The bank's loan product flexibility had a positive impact on its lending performance. HNB offers the following flexible loans programs targeted to LMI borrowers.

Community Access Mortgage (CAM) is an affordable housing program offered by HNB that is designed to provide a competitively priced mortgage program for LMI individuals or families or for properties in LMI geographies. The program features up to a 97 percent loan-to-value for purchase transactions without requiring mortgage insurance. Borrowers are required to provide a \$500 down payment from their own funds. The bank made 24 loans for a total of \$2.6 million in the Detroit MD (\$2.2 million) and in the Warren MD (\$489,000) AAs during the evaluation period.

HNB offers a Federal Housing Authority (FHA) fixed rate residential mortgage product. The FHA mortgage allows for a low down payment and includes a low minimum credit score. The FHA mortgage can also be used in conjunction with Section 8 Homeownership vouchers. The bank made 1,550 loans for a total of \$187.9 million in the Detroit MD (\$25.8 million), the Michigan non-MSA (\$49.5 million), and the Warren MD (\$112.6 million) AAs during the evaluation period.

HNB offers a United States Department of Agriculture (USDA) Rural Development Housing Loan Program. The program features a low minimum credit score and up to 100 percent financing. The bank made 276 loans for a total of \$29.8 million in the Detroit MD (\$128,000), the Michigan non-MSA (\$23.5 million), and the Warren MD (\$6.2 million) AAs during the evaluation period.

HNB partners with the Michigan State Housing Development Authority to provide down payment assistance and closing cost assistance. The bank made 43 loans for a total of \$3.5 million in the Detroit MD (\$903,000), the Michigan non-MSA (\$252,000), and the Warren MD (\$2.4 million) AAs during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, HNB's performance under the Lending Test in the Grand Rapids AA, Holland AA, Jackson AA, Kalamazoo AA, and South Bend AA is consistent with the bank's overall "Outstanding" performance in the state. Performance in the Ann Arbor AA, Battle Creek AA, Lansing AA, Monroe AA, Muskegon AA, and Saginaw AA is weaker than the bank's overall "Outstanding" performance in the state and was good. This was due to weaker geographic distribution. Performance in the Flint AA and Niles AA is weaker than the bank's overall "Outstanding" performance in the state and was good. This was due to weaker geographic and borrower income distribution. Performance in the Bay City AA and Midland AA is weaker than the bank's overall "Outstanding" performance in the state, and is considered

adequate. The weaker performance was due to low lending volume; however, these AAs had a substantially shorter evaluation period than the other AAs in the state. Performance in the limited-scope areas was not significant enough to have an impact on the Lending Test rating in the state. Refer to the Tables 1 through 12 in the Michigan section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Michigan is rated "Outstanding." Based on full-scope review, the bank's performance in the Detroit, Warren, and MI non-MSA AAs is excellent.

Refer to Table 14 in the Michigan section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

Detroit MD

During the evaluation period, HNB made 32 investments, donations, and grants in the Detroit AA totaling \$21.3 million. This consisted of 12 investments totaling \$ 21.2 million, with 20 donations and grants totaling over \$57,000. In addition, nine prior period investments with a total book value of \$10 million remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$31.4 million represented 61.6 percent of Tier One Capital allocated to the AA. Additionally, at the end of the evaluation period there was one investment with \$181,000 in unfunded commitments. The bank's responsiveness to the identified needs of the AA is adequate, with affordable housing needs especially addressed. In terms of dollar volume, 99.5 percent of the bank's investments, donations, and grants were allocated to affordable housing.

One investment of note is \$2.9 million in a 161 unit affordable housing project creating housing units for low-income people in the AA. The bank provided project financing without securing the property with a mortgage, which enabled the project to qualify for HUD financing. HNB was one of three equity investors in this project.

Michigan non-MSA

During the evaluation period, HNB originated 34 investments, donations, and grants in the AA totaling \$7.2 million. This consisted of 10 investments totaling \$7.1 million, with 24 donations and grants totaling over \$75,000. In addition, 14 prior period investments with a total book value of \$2.9 million remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of 10.2 million represented 8.7 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified needs of the AA is adequate, with affordable housing needs especially addressed. In terms of dollar volume, 81 percent of the bank's investments, donations, and grants were allocated to affordable housing.

Warren MD

During the evaluation period, HNB made 27 investments, donations, and grants in the Warren MD totaling \$29.6 million. This consisted of 11 investments totaling \$29.6 million, with 16 donations and grants totaling over \$86,000. In addition, 10 prior period investments with a total

book value of \$8.1 million remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$37.7 million represented 7.6 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified needs of the AA is adequate, with affordable housing needs especially addressed. In terms of dollar volume, 100 percent of the bank's investments, donations, and grants were allocated to affordable housing.

One investment of note is \$5 million in a fund designed to target public welfare investments in the AA. The bank's investment represented 10 percent of the \$50 million fund.

MI Statewide Investments

Investments in the greater Michigan statewide area contributed positively to the overall "Outstanding" Investment Test rating in the state. In addition to the qualified investments in the bank's AAs, HNB made one qualifying investment totaling \$5.2 million during the evaluation period in the broader statewide area that had a purpose, mandate or function to serve one or more of the bank's AAs in the state. This small business loan fund provided financing throughout the state. When considering this investment along with all other investments in the full- and limited-scope areas, the total dollar amount of \$116.5 million represented 11.55 percent of Tier One Capital allocated to Michigan.

Conclusions for Area Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the Investment Test in the Ann Arbor MSA, Battle Creek MSA, Grand Rapids MSA, Kalamazoo MSA, Lansing MSA, Midland MSA, and Monroe MSA is consistent with the bank's "Outstanding" performance under the Investment Test in Michigan. In the Bay City MSA, Flint MSA, Holland MSA, Jackson MSA, Muskegon MSA, Niles MSA, Saginaw MSA, and South Bend MSA, HNB's performance is weaker than the bank's overall performance in the state due to the lower level of investments.

Refer to Table 14 in the Michigan section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

SERVICE TEST

HNB's performance under the Service Test in the State of Michigan is rated "High Satisfactory." Based on full-scope reviews the bank's performance in the Detroit AA is good, is adequate in the Michigan Non-MSA, and excellent in the Warren MD AA. In the Detroit MD AA, in addition to branch distribution performance, branch opening and closing activities along with excellent CD service performance contributed to the overall AA conclusion.

Conclusion for Areas Receiving Limited Scope Reviews

Retail Banking Services

Refer to Table 15 in the Michigan section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Detroit MD AA

HNB's branch distribution in this AA is adequate when considering branches near LMI geographies. Branches are reasonably accessible to geographies and individuals of different income levels. Primary consideration was given to HNB's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in middle- or upper-income geographies that border LMI geographies, or are adjacent to and within one-half mile in proximity of LMI geographies. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the assessment areas, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. The bank had one branch in a low-income CT and two branches in moderate-income CTs. The percentage of bank branches in both low- and moderate-income CTs was well below the population percentages in those respective geographies. Consideration was given to two branches in middle-income geographies that were near low-income CTs and two branches in middle-income geographies were near moderate-income CTs, as described above.

Branch openings and closings have improved the accessibility of the bank's delivery systems to LMI geographies or individuals, although additional openings in middle- and upper-income geographies adversely impacted the distribution reflected in appendix D. During the evaluation period, HNB opened a total of 12 branches and closed two branches in the AA. The bank opened one branch in a low-income geography and one in a moderate-income geography, as well as opening four branches in middle-income CTs and six in upper-income CTs. One branch in a middle-income geography was closed because of the bank's strategic decision to exit its branches located in retirement centers. Additionally the bank closed one branch in a middle-income CT due to periodic analysis of branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Michigan Non-MSA

Refer to Table 15 in the Michigan section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB's branch distribution in the AA is adequate when considering branches near LMI geographies. Branches are reasonably accessible to all geographies and individuals of different income levels. Primary consideration was given to HNB's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in middle- or upper-income geographies that border LMI geographies or

are adjacent to and within one-half mile in proximity of LMI geographies. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the assessment areas, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. Our analysis took into consideration the impact the CT income designation changes, reflected in appendix C, had on the overall branch distribution. There were no branches in the one low-income CT. Two branches were in moderate-income CTs, which was below the population percentages in these geographies. Consideration was given to five branches in middle-income CTs that were near moderate-income CTs, as described above.

Branch openings and closings have not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals, although additional openings in middle- and upper-income geographies adversely impacted the distribution reflected in appendix D. During the evaluation period the bank opened 12 and closed six branches in the AA. No branches were opened in low- or moderate-income CTs during the evaluation period. Seven branches in middle-income CTs and five branches in upper-income CTs were opened. Six branches in middle-income geographies were closed due to periodic analysis of branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Warren MD AA

Refer to Table 15 in the Michigan section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB's branch distribution in the AA is excellent. Branches are readily accessible to all portions of the AA. The bank had five branches in low-income CTs in the AA, which exceeded the population percentage. The bank had 11 branches in moderate-income geographies, which was near to the population percentage and reflected good performance.

Branch openings and closings have improved the accessibility of the bank's delivery systems to LMI geographies or individuals. During the evaluation period, HNB opened a total of 19 and closed eight branches. The bank opened two branches in low-income geographies, three in moderate-income geographies, and fourteen in middle-income geographies. Two branches in moderate-income, four branches in middle-income, and two in upper-income geographies were closed due to periodic analysis of branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

Detroit MD AA

HNB's performance in providing CD services in the Detroit AA is excellent. The bank is a leader in providing community development services. One hundred six employees participated in 288 CD activities with 30 organizations, totaling 1,099 hours, which included 10 leadership positions. The bank's efforts demonstrated excellent responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups, low- and moderate-income persons and families, and small businesses. A significant effort focused on affordable housing and economic development, identified community needs. Volunteers provided assistance in submitting FHLB AHP grant applications for two organizations. Additionally, volunteers provided 38 hours of financial education to first time homebuyers. Bank employees also provided 149 hours of financial education and technical services to small businesses. One hundred twenty two hours of these activities were provided in support of the Pure Michigan Microlending Initiative. Bank employees also provided 75 hours in a board of director capacity for economic development organizations, including service on loan committees approving microloans to small businesses.

Per OCC community contacts, the Detroit population is underbanked. Volunteers provided 53 hours of account opening for LMI individuals, including 33 hours of account opening for first time LMI homeowners in response to this community need.

Employees provided 122 hours of financial education in collaboration with the Detroit Development Fund, the Michigan Economic Development Corporation, Michigan Women's Foundation and Life Line Business Consulting Services. Classes are a part of a business plan and technical assistance program for potential start-up businesses and existing small business owners. The program focuses on women and minority businesses.

One employee provided 62 hours of Board service for the Opportunity Resource Fund. Opportunity Resource Fund is a 501(c)(3) Community Development Financial Institution.

Michigan Non-MSA

HNB's performance in providing CD services in the Michigan Non-MSA is excellent. The bank is a leader in providing community development services. Two hundred and twenty nine employees participated in 305 CD activities with 27 organizations, totaling 2,197 hours, which included six leadership positions. The bank's efforts demonstrated excellent responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups, low- and moderate-income persons and

families, and small businesses. A significant effort focused on affordable housing and economic development, identified community needs. Volunteers provided 30 hours of assistance in submitting FHLB AHP grant applications for one organization, and provided 174 hours in a board of director capacity for three organizations with an affordable housing focus. Additionally, volunteers provided 223 hours of financial education to small business owners. Bank employees also provided 55 hours of technical assistance by reviewing grants for organizations to receive funding from the United Way, and in reviewing LMI individuals' requests for assistance from the Salvation Army.

One employee provided 305 hours of service as President of the Board for Father Fred Foundation, a community service organization providing financial assistance, and operating food service to LMI.

One employee provided 40 hours of BOD service as Board Chairman and finance committee service to Northwest Michigan Supportive Housing Corporation, an organization that provides critical needs services and affordable housing to homeless and LMI individuals. This BOD service included fundraising and solicitation of major donations for the organization.

Warren MD AA

HNB's performance in providing CD services in the Warren MD is excellent. The bank is a leader in providing community development services. One hundred ninety five employees participated in 458 CD activities with 35 organizations, totaling 2,638 hours, which included 14 leadership positions. The bank's efforts demonstrated excellent responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups, low- and moderate-income persons and families, and small businesses. A significant effort focused on affordable housing and economic development, identified community needs. Employees served 136 hours in a board of director capacity for affordable housing focused organizations. Economic Development services include collaboration with the Michigan Economic Development Corp and Lifeline Business Consulting Services as part of the Pure Michigan Micro Lending initiative to provide technical assistance to small business owners. Employees also provided 42 hours of board of director and Loan Committee service for organizations with an economic development focus. Community Development services also included 74 hours of tax preparation services for LMI individuals as well as account opening services for LMI individuals.

Six employees provided 55 service hours to with the Arab American and Chaldean Council (ACC). One employee provided 22 of the 55 aforementioned hours in Board service on various committees. ACC provides workforce development, youth programs and community revitalization programs.

One employee provided 136 hours of Board service to including service as Commissioner to Pontiac Housing Commission, which administers federal and state funding for AH to LMI individuals.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited scope reviews, performance under the Service Test in the Flint MSA, Lansing MSA, and Saginaw AAs was consistent with the overall "High Satisfactory" performance in the State of Michigan. Performance in the Jackson MSA, Kalamazoo MSA, Midland MSA, Monroe

MSA, Muskegon MSA, and Niles AAs was stronger than the overall “High Satisfactory” performance in the state. Performance in the Ann Arbor MSA, Battle Creek MSA, Bay City MSA, Grand Rapids MSA, and South Bend AAs was weaker than the bank’s overall “High Satisfactory” performance in the state. Performance differences were based on branch distribution. Performance differences in the limited scope AAs were not significant enough to affect the overall state Service Test rating. Refer to Table 15 in the Michigan section of appendix D for the facts and data that support these conclusions

State Rating

State of Ohio

CRA Rating for Ohio⁵:	Outstanding
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Overall geographic distribution is adequate, as evidenced by adequate home mortgage performance and good small loans to businesses performance.
- Overall borrower distribution is good, as evidenced by overall good home mortgage and excellent small loans to businesses performance.
- HNB's CD lending is exceptionally strong and had a significantly positive impact on overall lending performance in the Cleveland and Columbus AAs.
- Overall investment performance is excellent and responsive to identified needs. Performance in the limited-scope AAs along with the broader statewide area contributed to the bank's excellent performance.
- Delivery systems are readily accessible to geographies and individuals of different incomes. The bank is a leader in providing qualifying CD services.

Description of Institution's Operations in Ohio

Ohio is HNB's most significant rating area, representing 57.8 percent of deposits and 50.8 percent of loans reported within the bank's AAs. The bank and holding company are headquartered in Columbus, Ohio. HNB is one of the largest insured financial institutions in the state, operating 357 offices with deposits totaling \$31.2 billion, excluding offices and deposits located within the Ohio portions of four MMSAs. HNB offers its full range of residential, consumer, and commercial financial products and services in Ohio.

HNB has 11 AAs in Ohio with offices currently located in nine MSAs plus 25 non-MSA counties throughout the state. HNB's primary market areas in Ohio are within the Columbus MSA (Columbus AA) and the Cleveland Elyria-Mentor MSA (Cleveland AA). HNB has 84 offices with \$17.5 billion in deposits within the Columbus AA, while 93 offices with \$4.8 billion in deposits are located within the Cleveland AA. The bank also had AAs within the Akron, Canton, Dayton, Lima, Mansfield, Sandusky, Springfield, and Toledo MSAs. The 25 non-MSA counties in Ohio

⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

are combined to form one AA (OH Non-MSA AA). We reviewed these AAs using limited-scope procedures.

HNB's AA's were impacted by branch opening/closings and OMB changes during the evaluation period. As a result of OMB changes, Erie County (the entire Sandusky MSA) and Ottawa County (part of the Toledo MSA) were re-designated as non-MSA counties. As a result of branch openings, Guernsey and Washington Counties were added to the OH Non-MSA. Finally, as a result of branch closings, Scioto County was removed from the OH Non-MSA. HNB realized a net increase of 36 branches in Ohio during the evaluation period. HNB increased its number of branches in full-scope AAs by 27, and in limited-scope AAs by nine. Refer to table 15 in appendix A for details on the bank's branch openings and closings for each AA.

Please refer to the market profiles for Ohio in appendix C for detailed demographics and other performance context information for the AAs that received full-scope reviews. Refer to appendix A for the detail of counties that comprise the limited- scope AAs.

Scope of Evaluation in Ohio

For Ohio, we completed a full-scope review of the Columbus and Cleveland AAs. The two AAs represent the bank's most significant markets in Ohio, with a combined \$22.2 billion and 41.3 percent of the bank's total deposits. For the evaluation period, AA loan volume was 26.7 percent. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

The bank did not originate or purchase a sufficient volume of home improvement loans in the Mansfield and Sandusky AAs to perform a meaningful analysis. The bank did not originate or purchase a sufficient volume of small loans to farms in the Lima, Mansfield, and Sandusky AAs to perform a meaningful analysis.

Ohio's ratings are based primarily on conclusions reached for performance in the Columbus and Cleveland AAs where we used full-scope procedures. We assessed performance in the AAs within the Akron, Canton, Dayton, Lima, Mansfield, Sandusky, Springfield, and Toledo MSAs using limited scope procedures. The 25 non-MSA counties in Ohio were combined to form one AA (OH Non-MSA). In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC. In conjunction with this evaluation, we met with members of the local community in the full-scope AAs. In the Cleveland AA, we met with or reviewed recent community contacts with an affordable housing organization. In Columbus we met with or reviewed recent community contacts with a community development corporation, an affordable housing organization, and a real estate developer. Refer to the market profiles in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Ohio is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Cleveland AA and Columbus AA is good.

Lending Activity

Refer to Table 1 Lending Volume in the Ohio section of appendix D for the facts and data used to evaluate the bank's lending activity.

Cleveland MSA

HNB's lending activity in the Cleveland AA is excellent. Based on FDIC Deposit Market Share data as of June 30, 2015, HNB achieved a 7.6 percent market share of deposits, ranking fifth among 37 financial institutions in the AA, and ranking them in the top 13.5 percent of total depository banks. Based on 2014 Peer Mortgage Data, HNB achieved a 3.5 percent market share of home purchase loans, ranking seventh among 326 reporting lenders and the equivalent to being in the top 2.2 percent of lenders. The bank achieved a 4.3 percent market share of home improvement loans, ranking fifth among 93 reporting lenders and the equivalent to being in the top 5.38 percent of lenders. The bank also achieved a 4.9 percent market share of home refinance loans, ranking sixth among 302 reporting lenders and the equivalent to being in the top 2 percent of lenders.

HNB achieved a 6 percent market share of small loans to businesses, ranking sixth among 100 reporting lenders, or the top 6 percent of lenders. The small business lending activity is excellent given the bank's market share and ranking when compared to the deposit market share and small business lending competition within the AA. The top five lenders for small business lending consisted of the nation's largest credit card lenders, which collectively had 60.8 percent of the market share. HNB achieved a 21 percent market share for lending to small farms, ranking first among 17 reporting lenders, or the top 5.9 percent of lenders.

Columbus MSA

HNB's lending activity in the Columbus AA is good. Based on FDIC Deposit Market Share data as of June 30, 2015, HNB achieved a 30.1 percent market share of deposits, ranking first among 50 financial institutions in the AA, and ranking it in the top 2 percent of total depository banks. Based on 2014 Peer Mortgage Data, HNB had a market share of 5.7 percent for home purchase loans, ranking third among 410 reporting lenders and the equivalent to being in the top 0.7 percent of lenders. For home improvement loans, the bank held a market share of 5.9 percent. HNB ranked sixth of 129 lenders, which is the equivalent to being in the top 4.7 percent of lenders. For home refinance loans, the bank ranked first among 340 lenders, with a 7.7 percent market share and the equivalent to being in the top 0.3 percent of lenders.

HNB achieved a 7.2 percent market share of small loans to businesses, ranking sixth among 91 reporting lenders. For small loans to farms, the bank ranked third among 26 lenders with a 17.5 percent market share.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending is adequate. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity.

Home Mortgage Loans

Overall, the geographic distribution of home mortgage loans is adequate.

Refer to Tables 2, 3, 4, and 5 in the Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Cleveland MSA

Overall, the geographic distribution of home mortgage loans is adequate.

The overall geographic distribution of home purchase loans is adequate. The percentage of loans in low-income geographies was well below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts was below its overall market share for home purchase loans. The bank's market share in moderate-income census tracts was near to its overall market share for home purchase loans.

The overall geographic distribution of home improvement loans is adequate. The percentage of loans in low-income geographies was well below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts exceeded its overall market share for home improvement loans. The bank's market share in moderate-income census tracts was below its overall market share for home improvement loans.

The overall geographic distribution of home refinance loans is good when considering market share performance. The percentage of loans in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income census tracts was below the percentage of owner-occupied units in these geographies. The bank's market share in both low- and moderate-income census tracts exceeded its overall market share for home refinance loans.

Columbus MSA

Overall, the geographic distribution of home mortgage loans is adequate.

The overall geographic distribution of home purchase loans is adequate. The percentage of loans in low-income geographies was below the percentage of owner-occupied units in these tracts. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these tracts. HNB's market share in the low-income census tracts exceeded its overall market share for home purchase loans. The bank's market share in the moderate-income census tracts approximated its overall market share for home purchase loans.

The overall geographic distribution of home improvement loans is good. The percentage of loans in low-income geographies approximated the percentage of owner-occupied units in these tracts. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these tracts. HNB's market share in the low-income census tracts exceeded its overall market share for home improvement loans. The bank's market share in the moderate-income census tracts was below its overall market share for home improvement loans.

The overall geographic distribution of home refinance loans is adequate when considering market share performance. The percentage of loans in both low- and moderate-income geographies was well below the percentage of owner-occupied units in these tracts. HNB's market share in low-income census tracts exceeded its overall market share for home refinance loans. The bank's market share in moderate-income census tracts was somewhat near to its overall market share for home refinance loans.

Small Loans to Businesses

Overall, the geographic distribution of small loans to businesses is good.

Refer to Table 6 in the Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Cleveland MSA

The overall geographic distribution of small loans to businesses is good. The percentage of loans made in low-income geographies was below the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies was near to the percentage of businesses in those geographies. The bank's market share in low-income geographies was somewhat near to its overall market share for small loans to businesses. The bank's market share in moderate-income geographies exceeded its overall market share for small loans to businesses.

Columbus MSA

The overall geographic distribution of small loans to businesses is good. The percentage of loans in low-income geographies exceeded the percentage of businesses in those geographies. The percentage of loans in moderate-income geographies was near to the percentage of businesses in those geographies. The bank's market share in low-income census tracts exceeded its overall small loans to businesses market share. The bank's market share in moderate-income census tracts was below its overall small loans to businesses market share.

Small Loans to Farms

Overall, the geographic distribution of small loans to farms is poor.

Refer to Table 7 in the Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Cleveland MSA

HNB's geographic distribution of small loans to farms is adequate. The bank did not originate or purchase any loans in low-income geographies. The percentage of loans in moderate-income geographies exceeded the percentage of farms in these geographies. The bank's market share in moderate-income census tracts however, was near to the AA's overall small loans to farms market share.

Columbus MSA

The bank's geographic distribution of small loans to farms is poor. The percentage of loans made in low-income geographies was well below the percentage of farms in these geographies, but with limited demand for small farm loans in the AA. The percentage of loans in moderate-income geographies was significantly below the percentage of farms in these geographies. HNB's market share in low-income census tracts exceeded the overall market share. The bank's market share in moderate-income census tracts was well below the overall market share.

Lending Gap Analysis

We reviewed summary reports and maps, and analyzed HNB's home mortgage and small business lending activity over the evaluation period, to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of the bank's lending is good. As noted previously, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is good.

Refer to Tables 8, 9 and 10 in the 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.

Cleveland MSA

Overall, the borrower distribution of home mortgage loans is good.

The overall borrower distribution of home purchase loans is good. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was below its overall market share of home purchase loans. The bank's market share of loans to moderate-income borrowers was near to its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers was lower than the proportion of low-income families. We considered the constraints on lending to low-income borrowers resulting from the ratio of housing costs to

low-income reflected in appendix C in evaluating the distribution of loans. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeded its overall market share of home improvement loans. The bank's market share of loans to moderate-income borrowers was near to its overall market share of home improvement loans.

The overall borrower distribution of home refinance loans is good when considering market share performance. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers was near to the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers exceeded the overall market share of refinance loans.

Columbus MSA

Overall, the borrower distribution of home mortgage loans is good.

The overall borrower distribution of home purchase loans is excellent. The percentage of loans to low-income borrowers was lower than the proportion of low-income families. We considered the constraints on lending to low-income borrowers resulting from the ratio of housing costs to low-income reflected in appendix C in evaluating the distribution of loans. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeded its overall market share of home purchase loans. The bank's market share of loans to moderate-income borrowers exceeded its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is excellent when considering market share performance. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low-income and moderate-income borrowers exceeded its overall market share of home purchase loans.

The overall borrower distribution of home refinance loans is good when considering market share performance. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers substantially met the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeded the overall market share of refinance loans. HNB's market share of loans to moderate-income borrowers was near to the overall market share of refinance loans.

Small Loans to Businesses

The overall borrower distribution of small loans to businesses is excellent.

Refer to Table 11 in the Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Cleveland MSA

The overall borrower distribution of small loans to businesses is excellent. The percentage of small loans to small businesses was near to the percentage of small businesses. The bank's market share of small loans to small businesses exceeded its overall market share of small loans to businesses.

Columbus MSA

The overall borrower distribution of small loans to businesses is excellent when considering market share performance. The percentage of small loans to small businesses was near to the percentage of small businesses. The bank's market share of small loans to small businesses significantly exceeded its overall market share of small loans to businesses.

Small Loans to Farms

The overall borrower distribution of small loans to farms is good.

Refer to Table 12 in the Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Cleveland MSA

HNB's overall borrower distribution of small loans to farms is good. The percentage of small loans to small farms was below the percentage of small farms in the AA. However, the bank's market share of small loans to small farms exceeded its overall market share of small loans to farms.

Columbus MSA

The bank's overall borrower distribution of small loans to farms is good. The percentage of small loans to small farms was below the percentage of small farms in the AA. However, the bank's market share of loans to small farms exceeded the overall market share of small loans to farms.

Community Development Lending

Refer to Table 1 Lending Volume in the Ohio section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Cleveland MSA

CD lending was exceptionally strong, and had a significantly positive impact on overall lending performance in the Cleveland AA. This performance compensated for overall adequate retail lending performance. HNB originated 53 loans totaling \$212.4 million in qualified CD loans in the AA during the evaluation period. This volume represented 41.3 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated good responsiveness to AA needs. CD loans supported small businesses, affordable housing initiatives for LMI individuals, supported community

service organizations in the AA, and activities that promoted revitalized or stabilized LMI geographies in the AA.

Specific examples of the CD loans originated during this evaluation period include:

- An \$8 million loan to finance the construction of the mixed-use property project located in a moderate-income census tract. The project qualifies for New Markets Tax Credits (NMTC) and meets the requirements of a Qualified Active Low-Income Community Business (QALICB) under the Federal and State of Ohio NMTC guidelines.
- A \$1.3 million SBA loan to fund a site housing three organizations that provide health services to low- and moderate-income persons.

Columbus MSA

CD lending was exceptionally strong, and had a significantly positive impact on overall lending performance in the Columbus AA. This performance compensated for overall adequate retail lending performance. HNB originated 80 loans totaling \$313.4 million in qualified CD loans in the AA during the evaluation period. This volume represented 16.9 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated good responsiveness to AA needs. CD loans supported small businesses, affordable housing initiatives for LMI individuals, supported community service organizations in the AA, and activities that promoted revitalized or stabilized LMI geographies in the AA.

Specific examples of the CD loans originated during this evaluation period include:

- A \$12.8 million loan to develop a 259-unit apartment project and structured parking located in a low-income census tract specifically targeted by the city of Columbus for redevelopment and revitalization.
- A \$1 million revolving line of credit to a nonprofit advocacy organization based in a low-income census tract that serves low- and moderate- income constituents.

Ohio Statewide CD Loans

HNB also made three CD loans totaling \$8.4 million in the greater statewide area with no purpose, mandate or function to serve an AA(s). These loans received consideration as a result of the bank's performance in the AAs.

Product Innovation and Flexibility

The bank's loan product flexibility had a positive impact on its lending performance. HNB offers the following flexible loans programs targeted to LMI borrowers.

Community Access Mortgage (CAM) is an affordable housing program offered by HNB that is designed to provide a competitively priced mortgage program for LMI individuals or families or for properties in LMI geographies. The program features up to a 97 percent loan-to-value for purchase transactions without requiring mortgage insurance. Borrowers are required to provide a \$500 down payment from their own funds. The bank made 99 loans for a total of \$12.9

million in the Cleveland (\$2.3 million) and in the Columbus (\$10.6 million) AAs during the evaluation period.

HNB offers a Federal Housing Authority (FHA) fixed rate residential mortgage product. The FHA mortgage allows for a low down payment and includes a low minimum credit score. The FHA mortgage can also be used in conjunction with Section 8 Homeownership vouchers. The bank made 3,973 loans for a total of \$521.2 million in the Cleveland (\$151.2 million), and the Columbus (\$370 million) AAs during the evaluation period.

HNB HomeTown Mortgage is an affordable housing program offered by the bank that is designed to provide a competitively priced mortgage program. The program features up to a 97 percent loan-to-value for purchase transactions without requiring mortgage insurance. Additionally, the program allows for a minimum credit score of 580. The bank made 288 loans for a total of \$32.8 million in the Cleveland (\$13.5 million) and the Columbus (\$19.3 million) AAs during the evaluation period.

HNB offers a United States Department of Agriculture (USDA) Rural Development Housing Loan Program. The program features a low minimum credit score and up to 100 percent financing. The bank made 42 loans for a total of \$5.7 million in the Cleveland (\$436,000) and the Columbus (\$5.3 million) AAs during the evaluation period.

HNB partners with the Ohio Housing Finance Agency to provide down payment assistance and closing cost assistance. The bank made 115 loans for a total of \$12.2 million in the Cleveland (\$2.3 million) and the Columbus (\$9.8 million) AAs during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, HNB's performance under the Lending Test in the Akron, Dayton, and Lima AAs is consistent with the bank's overall "High Satisfactory" performance in the state. Performance in the Canton, OH Non-MSA, and Toledo AAs is stronger than the overall "High Satisfactory" performance in the state, due to stronger borrower income distribution. Performance in the Springfield AA was also stronger than the bank's overall performance in the state, due to stronger geographic and borrower income distribution. Performance in the Mansfield AA is weaker than the bank's overall performance in the state, and is considered adequate. This was due to weaker borrower income distribution and neutral CD lending performance. Finally, performance in the Sandusky AA was weaker than the bank's overall performance in the state, and is considered adequate. This was due to weaker geographic and borrower income distribution. Performance in the limited-scope areas was not significant enough to impact the Lending Test rating in the state. Refer to the Tables 1 through 12 in the Ohio section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Ohio is rated "Outstanding." Based on full-scope review, the bank's performance in the Cleveland AA is excellent, and good in the

Columbus AA. Performance in the combined limited-scope areas along with the broader statewide area contributed to the overall rating in the state.

Refer to Table 14 in the Ohio section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Cleveland MSA

During the evaluation period, HNB originated 61 investments, donations, and grants in the AA totaling \$58.4 million. This consisted of 31 investments totaling \$58.1 million, with 30 donations and grants totaling over \$323,000. In addition, 28 prior period investments with a total book value of \$10.3 million remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$69 million represented 13.4 percent of Tier One Capital allocated to the AA. Additionally, at the end of the evaluation period there was one investment with \$2.9 million in unfunded commitments. The bank's responsiveness to the identified needs of the AA is adequate, with affordable housing needs especially addressed. In terms of dollar volume, 80.7 percent of the bank's investments, donations, and grants were allocated to affordable housing.

One investment of note is \$5 million in a New Markets Tax Credit (NMTC) to construct a 42,000 square foot corporate headquarters for a marketing company in the AA. The site had been unused for 17 years and was redeveloped into three office buildings. The project deterred the company from leaving the area and taking with it 120 jobs. The company plans to create an additional 12 to 15 jobs.

Columbus MSA

During the evaluation period, HNB made 229 investments, donations, and grants in the Columbus AA totaling \$97.7 million. This consisted of 47 investments totaling \$92 million, with 182 donations and grants totaling over \$5.7 million. In addition, 31 prior period investments with a total book value of \$11.6 million remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$109.3 million represented 5.9 percent of Tier One Capital allocated to the AA. Additionally, at the end of the evaluation period there were two investments with \$3.7 million in unfunded commitments. The bank's responsiveness to the identified needs of the AA is good, with affordable housing needs especially addressed. In terms of dollar volume, 91.9 percent of the bank's investments, donations, and grants were allocated to affordable housing.

One investment of note is a \$5.5 million Low-Income Housing Tax Credit (LIHTC) supporting housing for low-income and homeless veterans in Columbus, Ohio. The bank also approved a \$2.6 million construction loan and sponsored a Federal Home Loan Bank AHP Grant.

OH Statewide Investments

Investments in the greater Ohio statewide area contributed positively to the overall "Outstanding" Investment Test rating in the state. In addition to the qualified investments in the bank's AAs, HNB made one qualifying investment totaling \$4.5 million during the evaluation period in the broader statewide area that had a purpose, mandate or function to serve one or more of the bank's AAs in the state. This affordable housing loan fund provided affordable housing financing throughout the state. When considering this investment along with all other investments in the full- and limited-scope areas, the total dollar amount of \$259.6 million represented 7.84 percent of Tier One Capital allocated to Ohio.

Conclusions for Area Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the Investment Test in the Akron, Dayton, Mansfield, Ohio non-MSA, Springfield, and Toledo AAs is consistent with the bank's "Outstanding" performance under the Investment Test in Ohio. In the Canton, Lima, and Sandusky AAs, HNB's performance is weaker than the bank's overall performance in the state due to the lower level of investments.

Refer to Table 14 in the Ohio section of appendix D for the facts and data that supports this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

HNB's performance under the Service Test in the State of Ohio is rated "Outstanding." Based on full-scope reviews, performance in the Cleveland and Columbus AAs is excellent. In the Cleveland AA, in addition to branch distribution performance, branch opening and closing activities along with CD service performance contributed significantly to the overall AA conclusion.

Conclusions Regarding Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the Ohio section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Cleveland AA

Branch distribution in the Cleveland AA is adequate when considering branches near LMI geographies. Branches are accessible to geographies and individuals of different income levels. Primary consideration was given to HNB's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in middle- or upper-income geographies that border LMI geographies or are adjacent to and within one-half mile in proximity of LMI geographies. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the assessment areas, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. The bank had five branches in a low-income CTs and nine branches in moderate-income CTs. The percentage of branches in both low- and moderate-income geographies was below the population percentages in those geographies. However, four branches in middle-income geographies were near low-income CTs and twelve branches in middle- or upper-income geographies were near moderate-income CTs, as described above.

Branch openings and closings have improved the accessibility of the bank's delivery systems to LMI geographies or individuals, although openings adversely affected the distribution of branches discussed above. The bank opened a total of 25 and closed eight branches during

the evaluation period. One branch was opened in a low-income CT and three branches were opened in moderate-income geographies. Ten branches were opened in middle-income and 11 were opened in upper-income CTs. One branch was closed in a low-income CT, one in an upper-income CT, and two were closed in moderate-income CTs because of the bank's strategic decision to exit its branches located in retirement centers. Two other branches located in moderate-income CTs one in an middle-income CT, and one in an upper-income CT were closed due to periodic analysis of branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Columbus AA

HNB's branch distribution in the AA is good when considering branches near LMI geographies. Branches are readily accessible to geographies and individuals of different income levels. Primary consideration was given to HNB's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in MUI geographies that border LMI geographies or are adjacent to and within one-half mile in proximity of LMI geographies. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the assessment areas, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. The bank had five branches in low-income CTs in the AA. The percentage of branches in low-income geographies was below the population percentage. Consideration was given to five branches in middle- or upper- income geographies that were near-to low-income CTs. The bank had 17 branches in moderate-income geographies. The percentage of branches in moderate-income CTs exceeded the percentage of population living in these geographies, as discussed above.

Branch openings and closings have not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. During the evaluation period the bank opened a total of 25 branches and closed 15 branches in the AA. Eight branches were opened in moderate-income CTs, five in middle-income CTs and 12 in upper-income CTs. The bank also opened two branches on college campuses in CTs with no income designation. Four branches located in low-income geographies and five in upper-income geographies were closed due to periodic analysis of branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance. One branch in a moderate-income and one in a middle-income geography as well as four in upper-income geographies were closed because of the bank's strategic decision to exit its branches located in retirement centers.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

Cleveland AA

HNB's performance in providing CD services in the Cleveland AA is excellent. The bank demonstrates a relatively high level of providing community development services. One hundred and ninety one employees participated in 540 CD activities with 54 organizations, totaling 4,950 hours, which included nine leadership positions. The bank's efforts demonstrated excellent responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups, low- and moderate-income persons and families, and small businesses. A significant effort focused on affordable housing, an identified community need. Volunteers provided 27 hours of assistance in submitting FHLB AHP grant submissions for three organizations and provided 472 hours of board of director service to Neighborhood Housing Services of Greater Cleveland, and Northeast Shores Development Corporation, organizations with an affordable housing focus. Volunteers also provided homeowner education classes to low and moderate income borrowers of two organizations. Lending, resources and education to small businesses are also an identified need. Two volunteers provided six hours of technical assistance to small businesses, and seven hours of Loan Committee service reviewing microloan applications to small businesses for the Economic And Community Development Institute, the only SBA Small Business Administration intermediary micro lender in 18 counties in Ohio. Additional efforts focused on revitalization, an identified community need per OCC Community Contacts. Various employees provided 187 hours of board of director service to organizations with a stabilization or revitalization purpose.

One employee provided 65 hours on the Board of Village Capital Corporation, a certified community development financial institution (CDFI) only a few such groups in Ohio. The employee acted in both the treasurer role and sat on the Loan Committee.

One employee provided 189 hours of Board membership on the loan review, strategic planning and finance committees of Neighborhood Housing Services of Greater Cleveland (NHSGC), an organization for assisting individuals and strengthening communities by supporting sustainable homeownership.

Columbus AA

HNB's performance in providing CD services in the Columbus AA is excellent. The bank is a leader in providing community development services. Ninety-three employees participated in 625 CD activities with 93 organizations, totaling 5,083 hours, which included 35 leadership positions. The bank's efforts demonstrated excellent responsiveness and a commitment to

community needs by providing technical assistance on financial and banking related matters to community groups, low- and moderate-income persons and families, and small businesses. A significant effort focused on affordable housing, an identified community need. Volunteers provide 93 hours of assistance in submitting Federal Home Loan Board (FHLB) AHP grant submissions for eight organizations and provided 408 hours of board of director service to organizations with an affordable housing focus. Various employees also provided 1188 hours of board of director service to organizations with an economic development purpose. Additionally, bank employees provided 628 hours of free tax preparation services for low and moderate income persons, provided 1,265 hours of financial education and 50 hours of account opening services to low and moderate income persons.

Fifteen employees volunteered 82 hours providing financial education to the YWCA Family Center and YWCA of Columbus. The YWCA Family Center holds the Money Monday program on the first and third Monday of each month, during which HNB employees conduct financial education classes for low income families in transition. Participants receive YWCA money vouchers that can be used to purchase family necessity items from the organization's in-house store.

One employee provided 28 hours of membership on the Economic and Community Development Institute (ECDI) board, and loan committees. Per bank provided information, ECDI, is the only U.S. Small Business Administration (SBA) and U.S. Treasury designated Community Development Financial Institution (CDFI) micro lender in 18 counties in central and southwest Ohio, and addresses the needs of very small business owners in the creation and expansion of their businesses. ECDI programs provided to entrepreneurs include financial literacy and small business development training, one-on-one technical assistance, and industry specific training and access to markets through the Growing Entrepreneurs Initiative.

Conclusion for Areas Receiving Limited-Scope Reviews

Based on a limited scope review, the bank's performance under the Service Test in the Ohio Non-MSA and Springfield AAs was consistent with the bank's overall "Outstanding" rating in the state. Performance in the Akron, Canton, Dayton, Lima, Mansfield, and Toledo AAs was weaker than the overall "Outstanding" performance in the state. Performance differences in these areas were based on weaker branch distribution, and was not significant enough to impact the overall state Service Test rating. Refer to Table 15 in the Ohio section of appendix D for the facts and data that support these conclusions.

State of Pennsylvania

CRA Rating Pennsylvania⁶:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Overall geographic distribution of loans is good. Home mortgage loan distribution is good, and small loans to businesses distribution is excellent.
- Overall borrower distribution of loans is excellent, as evidenced by both excellent home mortgage and small loans to businesses performance.
- CD lending had a significantly positive impact on overall lending performance and was responsive to identified needs.
- Qualified investment activity is excellent and responsive to CD needs in the AA.
- Delivery systems are readily accessible to geographies and individuals of different incomes. The bank is a leader in providing qualifying CD services.

Description of Institution's Operations in Pennsylvania

HNB has 44 offices in Pennsylvania, offering its full range of residential, consumer, and commercial financial products and services. Pennsylvania is HNB's fourth largest rating area based on deposits and reported loans. Deposits total \$3 billion within the state and represent approximately 5.6 percent of the bank's total deposits, while 5.5 percent of HNB's reported AA loans are from Pennsylvania. HNB is one of the smaller financial institutions operating in Pennsylvania based on deposits, its overall statewide deposit market share is less than one percent.

As of the end of the exam period, HNB has three AAs in Pennsylvania with offices located in two MSAs and one Non-MSA county. HNB's primary market area in Pennsylvania is the Pittsburgh MSA where the bank has 37 offices and \$2.8 billion in deposits. The bank also has an AA in the Erie MSA, and a Non-MSA AA comprised of Lawrence County (PA Non-MSA AA).

Please refer to the market profile for Pennsylvania in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review. Refer

⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

to appendix A for listing of counties that comprise the limited-scope AAs.

Scope of Evaluation in Pennsylvania

The Pittsburgh AA was selected for a full-scope review. This AA accounts for \$2.8 billion, and 5.2 percent of total bank deposits. For the evaluation period, the AA loan volume was 4.6 percent of total reportable lending. Pennsylvania ratings are based primarily on conclusions reached for performance in the Pittsburgh AA where we used full-scope procedures. The Erie and PA Non-MSA AAs were reviewed using limited-scope procedures. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

During the evaluation period, the bank did not originate or purchase a sufficient volume of small loans to farms in any AA to perform a meaningful analysis.

In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC. In conjunction with this evaluation, we met with or reviewed recent community contacts with a housing and redevelopment organization in Butler Pennsylvania, an affordable housing/community stabilization organization in Pittsburgh, and an economic development organization in Butler County. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Pennsylvania is rated "Outstanding." Based on the full-scope review, the bank's performance in the Pittsburgh AA is excellent.

Lending Activity

Refer to Table 1 Lending Volume in the Pennsylvania section of appendix D for the facts and data used to evaluate the bank's lending activity.

HNB's lending activity in the Pittsburgh AA is good. Based on FDIC Deposit Market Share data as of June 30, 2015, HNB achieved a 2.5 percent market share of deposits, ranking seventh among 50 financial institutions in the AA, and ranking them in the top 14 percent of total depository banks. Based on 2014 Peer Mortgage Data, HNB achieved a 1.3 percent market share of home purchase loans, ranking 17th among 381 reporting lenders and is equivalent to being in the top 4.5 percent of lenders. The bank achieved a 1 percent market share of home improvement loans, ranking 18th among 161 reporting lenders and is equivalent to being in the top 10.8 percent of lenders. The bank achieved a 1.6 percent market share of home refinance loans, ranking 11th among 341 reporting lenders and the equivalent to being in the top 3.2 percent of lenders. For home refinance loans, the top five lenders collectively had 44.3 percent of the total market share.

HNB achieved a 2.2 percent market share of small loans to businesses, ranking 13th among 98 reporting lenders, or the top 13.3 percent of lenders. The top five lenders for small business

lending consisted of the nation's largest credit card lenders, which collectively had 63.9 percent of the market share.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending is good.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Overall, the geographic distribution of home mortgage loans is good. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall geographic distribution of home purchases loans is adequate. The percentage of loans in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts was below its overall market share for home purchase loans. The bank's market share in moderate-income census tracts exceeded its overall market share for home purchase loans.

The overall geographic distribution of home improvement loans is excellent. The percentage of loans in both low- and moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. Additionally, the bank's market share in both low- and moderate-income census tracts exceeded its overall market share for home improvement loans.

The overall geographic distribution of home refinance loans is good when considering market share performance. The percentage of loans in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was near to the percentage of owner-occupied units in these geographies. The bank's market share in both low- and moderate-income census tracts exceeded its overall market share for home refinance loans.

Small Loans to Businesses

Refer to Table 6 in the Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The percentage of loans in low-income geographies approximated the percentage of businesses in those geographies. The percentage of loans in moderate-income geographies exceeded the percentage of businesses in those geographies. The bank's market share in low-income geographies was near to its overall market share for small loans to businesses. The bank's

market share in moderate-income geographies exceeded its overall market share for small loans to businesses.

Lending Gap Analysis

We reviewed summary reports and maps, and analyzed HNB's home mortgage and small business lending activity over the evaluation period, to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of the bank's lending is excellent.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the Pennsylvania 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.

Overall, the borrower distribution of home mortgage loans is excellent. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall borrower distribution of home purchase loans is excellent when considering market share performance. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers exceeded its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is excellent. The percentage of loans to low-income borrowers approximated the percentage of low-income families. The percentage of moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers exceeded its overall market share of home improvement loans.

The overall borrower distribution of home refinance loans is excellent when considering market share performance. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers exceeded the overall market share of refinance loans.

Small Loans to Businesses

Refer to Table 11 in the Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is excellent when considering market share performance. The percentage of small loans to small businesses was near to the percentage of small businesses. The bank's market share of small loans to small businesses exceeded its overall market share of small loans to businesses.

Community Development Lending

Refer to Table 1 Lending Volume in the Pennsylvania section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending was exceptionally strong, and had a significantly positive impact on its overall lending performance in the Pittsburgh AA. This performance compensated for overall good retail lending performance. HNB originated 28 loans totaling \$96.7 million in qualified CD loans in the AA during the evaluation period. This volume represented 32.7 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated good responsiveness to AA needs. CD loans supported small businesses, affordable housing initiatives for LMI individuals, community service organizations in the AA, and activities that promoted revitalized or stabilized LMI geographies in the AA.

Specific examples of the CD loans originated during this evaluation period include:

- An \$8.1 million loan for a 62-unit LIHTC project.
- A \$5 million construction loan to build a new Pennsylvania Title 1 school and office building on a previously vacant lot located in a moderate-income census tract.

PA Statewide CD Loans

In addition to CD loans originated in AAs, HNB also made one CD loan totaling \$5.7 million in the greater statewide area and did not have a purpose, mandate or function to serve an AA(s), but is considered given CD lending performance in the AAs.

Product Innovation and Flexibility

The bank's loan product flexibility had a positive impact on its lending performance. HNB offers the following flexible loans programs targeted to LMI borrowers.

Community Access Mortgage (CAM) is an affordable housing program offered by HNB that is designed to provide a competitively priced mortgage program for LMI individuals or families or for properties in LMI geographies. The program features up to a 97 percent loan-to-value for purchase transactions without requiring mortgage insurance. Borrowers are required to provide a \$500 down payment from their own funds. The bank made 16 loans for a total of \$917,000 in the Pittsburgh AA during the evaluation period.

HNB offers a Federal Housing Authority (FHA) fixed rate residential mortgage product. The FHA mortgage allows for a low down payment and includes a low minimum credit score. The FHA mortgage can also be used in conjunction with Section 8 Homeownership vouchers. The bank made 326 loans for a total of \$37.7 million in the Pittsburgh AA during the evaluation period.

HNB's loan portfolio includes a Fannie Mae (FNMA) HomeStyle Renovation loan product. The purpose of this loan product is to offer a single conventional mortgage for both the purchase and the renovations of a home. The program requires only a five percent down payment. The bank made nine loans for a total of \$1.3 million in the Pittsburgh AA during the evaluation period.

HNB offers a United States Department of Agriculture (USDA) Rural Development Housing Loan Program. The program features a low minimum credit score and up to 100 percent financing. The bank made 20 loans for a total of \$1.7 million in the Pittsburgh AA during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, HNB's performance under the Lending Test in the Erie and PA Non-MSA AAs is weaker than the bank's overall "Outstanding" performance in the state. Weaker performance in these AAs was due to weaker geographic and borrower income performance. Performance in the limited-scope areas was not significant enough to have an impact on the Lending Test rating in the state. Refer to the Tables 1 through 12 in the Pennsylvania section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Pennsylvania is rated "Outstanding." Based on full-scope review, the bank's performance in the Pittsburgh MSA is excellent.

Refer to Table 14 in the Pennsylvania section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, HNB originated 56 investments, donations, and grants in the AA totaling \$33.4 million. This consisted of eight investments totaling \$33.1 million, with 48 donations and grants totaling over \$251,000. In addition, six prior period investments with a total book value of \$6.9 million remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$40.3 million represented 13.6 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified needs of the AA is good, with affordable housing needs especially addressed. In terms of dollar volume, 100 percent of the bank's investments, donations, and grants were allocated to affordable housing.

One investment of note is a \$13.8 LIHTC for an 85 unit building in Pittsburgh, Pennsylvania. The majority of the 85 units will be designated for LMI tenants. The project is part of a master

plan developed for a Choice Neighborhood Implementation Grant and will replace demolished public housing properties previously on the site.

Conclusions for Area Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the Investment Test in the Erie AA is consistent with the bank's "Outstanding" performance under the Investment Test in Pennsylvania. In the PA non-MSA, HNB's performance is weaker than the bank's overall performance in the state due to the lower level of investments.

Refer to Table 14 in the Pennsylvania section of appendix D for the facts and data that supports this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

HNB's performance under the Service Test in the State of Pennsylvania is rated "Outstanding." Based on a full-scope review of the Pittsburgh AA, the bank's performance is excellent.

Retail Banking Services

Refer to Table 15 in the Pennsylvania section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB's branch distribution in the AA is excellent. Branches are readily accessible to geographies and individuals of different income levels. The bank had two branches in low-income CTs within the AA, which exceeded the population percentage. The bank had nine branches in moderate-income geographies, which exceeded the population percentage.

Branch openings and closings have generally not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. No branches were opened in low- or moderate-income geographies. One branch was opened in a middle-income geography. Two branches located in moderate-income geographies and three branches located in middle-income geographies were closed due to periodic analysis of branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

HNB's performance in providing CD services in the Pittsburgh AA is excellent. The bank demonstrates a relatively high level of providing community development services. Ninety-nine employees participated in 347 CD activities with 41 organizations, totaling 1,808 hours, which included 17 leadership positions. The bank's efforts demonstrated excellent responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups, low- and moderate-income persons and families, and small businesses. A significant effort focused on organizations with a focus on community services to LMI and homeless individuals, an identified community development need. Volunteers provided 501 hours of board of director service to community service organizations. Employees provided additional focus to affordable housing and economic development, which were identified community needs. Volunteers provided assistance in submitting FHLB AHP grant applications for three organizations, and provided 18 hours of first time homebuyer education. Volunteers provided 47 hours of BOD service to organizations with an economic development focus including 10 hours of service on the loan review committee of a community development fund. Revitalization efforts included sitting on the strategic planning committee of an ED organization that focuses on affordable housing, economic development, and revitalization of LMI CTs in the MSA, for which HNB is a partner.

Two employees provided 30 hours of Board service to the Northside Leadership Conference, a certified Community Development Corporation, and on Northside Community Development Fund (NSCDF) Funds Loan Review Committee for small business loans. NSCDF is a state of PA Neighborhood Partnership Program.

Eight employees provided 138 hours of CD services for Auberle in Pittsburgh. Services, included 63 hours of Board service and provision of financial education to the LMI members of the organization. Auberle is a residential facility that offers programs and services for LMI youth, including transitional housing for youth who cannot live with their families, and youth transitioning out of foster care.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Erie and PA Non-MSA AAs was consistent with the bank's overall "Outstanding" performance in the state. Refer to Table 15 in the Pennsylvania section of appendix D for the facts and data that support these conclusions.

State of West Virginia

CRA Rating for West Virginia⁷:	Satisfactory
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Needs to Improve
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Overall geographic distribution of loans is good. Adequate home mortgage performance was augmented by excellent small loans to businesses performance.
- Overall borrower distribution of loans is good. The borrower distribution of both home mortgage loans and small loans to businesses is good.
- CD lending had a significantly positive impact on overall lending performance and was responsive to identified needs.
- Overall qualified investment activity is poor, although it was generally responsive to identified needs.
- Delivery systems are readily accessible to individuals and geographies of different income levels.

Description of Institution's Operations in West Virginia

HNB has 32 offices in West Virginia, offering its full range of residential, consumer, and commercial financial products and services. West Virginia is HNB's seventh largest rating area based on deposits and reported loans. Deposits totaling \$1.9 billion within the state represent 3.5 percent of the bank's total deposits, while 3.3 percent of HNB's reported loans are from West Virginia. While HNB is one of the larger financial institutions operating in West Virginia based on deposits, its overall statewide deposit market share is just over six percent.

HNB has five AAs in West Virginia, with offices located in the Charleston MSA, Huntington West Virginia MSA, Morgantown MSA, Parkersburg MSA, and a non-MSA area comprised of Harrison, Lewis, Marion, Randolph, and Ritchie counties (WV Non-MSA AA). These AAs exclude two MMSAs that are evaluated separately. The Huntington, West Virginia MSA is also multistate (WV-KY-OH), but HNB only has a presence in the West Virginia portion of the MSA so that AA is included in the evaluation of performance in West Virginia. While none of the AAs represents a majority of the bank's operations in the state, the Charleston MSA is the bank's primary market area.

⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

HNB's AA's in West Virginia was impacted by OMB changes during the evaluation period. For the time period 2012 through 2013 Putnam County was included as part of the Charleston AA. With the OMB changes, Putnam County was moved to the Huntington AA. During the evaluation period HNB did not realize a net increase or decrease in the number of branches in West Virginia.

Refer to the market profiles for West Virginia in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in West Virginia

For West Virginia, the Charleston and WV Non-MSA AAs were selected for a full-scope review. These two AAs account for the majority of HNB market share in West Virginia. The combined AAs account for \$1.2 billion and 2.2 percent of total bank deposits. The Huntington West Virginia AA, Morgantown AA, and Parkersburg AA, were reviewed using limited-scope reviews. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

The bank did not originate or purchase a sufficient volume of small loans to farms in any AA in the state to perform a meaningful analysis.

West Virginia ratings are based primarily on conclusions reached for performance in the Charleston and WV Non-MSA AAs where we used full-scope procedures. In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC. In conjunction with this evaluation, we met with a regional planning and economic development organization. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in West Virginia is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Charleston and WV Non-MSA AAs is excellent. In performing our analysis, we placed greater weight on the bank's home mortgage loan performance, as it represented the majority of the bank's reportable lending activity. Additionally for the geographic distribution and borrower income distribution analysis, we placed greater weight on the bank's performance in 2014 through 2015 than in 2012 through 2013 for the AAs impacted by the OMB changes.

Lending Activity

Refer to Table 1 Lending Volume in the West Virginia section of appendix D for the facts and data used to evaluate the bank's lending activity.

Charleston MSA

HNB's lending activity in the Charleston AA is good. Based on FDIC Deposit Market Share data as of June 30, 2015, HNB achieved a 15 percent market share of deposits, ranking third

among 12 financial institutions in the AA, and ranking them in the top 25 percent of total depository banks. Based on 2014 Peer Mortgage Data, HNB achieved a 5.3 percent market share of home purchase loans, ranking seventh among 108 reporting lenders and the equivalent to being in the top 6.5 percent of lenders. The bank achieved a 2.7 percent market share of home improvement loans, ranking ninth among 33 reporting lenders and the equivalent to being in the top 27.3 percent of lenders. The bank also achieved a 5.2 percent market share of home refinance loans, ranking seventh among 105 reporting lenders and the equivalent to being in the top 6.7 percent of lenders.

HNB achieved a 4.1 percent market share of small loans to businesses, ranking eighth among 44 reporting lenders, or the top 18.2 percent of lenders. The small business lending activity is excellent given the small business lending competition.

West Virginia non-MSA

HNB's lending activity in the WV Non-MSA AA is excellent. Based on FDIC Deposit Market Share data as of June 30, 2015, HNB achieved a 16.4 percent market share of deposits, ranking second among 22 financial institutions in the AA, and ranking them in the top 9.09 percent of total depository banks. Based on 2014 Peer Mortgage Data, HNB had a market share of 9.10 percent for home purchase loans, ranking third among 101 reporting lenders and the equivalent to being in the top 3 percent of lenders. For home improvement loans, the bank held market share of 12.9 percent and ranked third among 31 lenders, which is the equivalent of being in the top 9.7 percent of lenders. For home refinance loans, the bank ranked second among 77 lenders with a 10.5 percent market share and the equivalent to being in the top 2.6 percent of lenders. For home refinance loans, the top five lenders collectively had 50.5 percent of the total market share.

HNB achieved a 6.8 percent market share of small loans to businesses, ranking sixth among 43 reporting lenders. The top five lenders held 49.2 percent of the total small loans to businesses market share.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending is good. Adequate home mortgage performance was augmented by excellent small loans to businesses performance.

Home Mortgage Loans

Overall, the geographic distribution of home mortgage loans is adequate.

Refer to Tables 2, 3, 4, and 5 in the West Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Charleston MSA

Overall, the geographic distribution of home mortgage loans is adequate. This AA does not contain low-income geographies. Within home mortgage lending, more weight was given to refinance loans based on the amount of originations during the evaluation period.

The overall geographic distribution of home purchases loans is excellent. The bank's geographic distribution of home purchase loans during 2014 through 2015 was excellent. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts exceeded its overall market share for home purchase loans. The bank's performance in 2012 through 2013 was weaker than the performance noted in 2014 through 2015, and was good when considering market share performance. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts approximated its overall market share for home purchase loans. This performance did not have an impact on the overall conclusion for home purchase loans.

The overall geographic distribution of home improvement loans is adequate when considering performance in 2012 through 2013. The bank's geographic distribution of home improvement loans during 2014 through 2015 was poor. The percentage of loans in moderate-income geographies was well below the percentage of owner-occupied units in these geographies. The bank did not achieve a market share in moderate-income census tracts. The bank's performance in 2012 through 2013 was stronger than the performance noted in 2014 through 2015, and was excellent. The bank's percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in those geographies. The bank's market share in moderate-income geographies exceeded its overall home improvement loan market share. This performance had a positive impact on the overall home improvement conclusion.

The overall geographic distribution of home refinance loans is adequate when considering performance in 2012 through 2013. The bank's geographic distribution of home refinance loans during 2014 through 2015 was poor. The percentage of loans in moderate-income geographies was well below the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts was below its overall market share for home refinance loans. The bank's performance in 2012 through 2013 was stronger than the performance noted in 2014 through 2015, and was considered excellent when considering market share performance. The bank's percentage of loans within moderate-income geographies was near to the demographics. The bank's market share in the moderate-income census tracts exceeded its overall home refinance loan market share. This performance had a positive impact on the overall home refinance conclusion.

West Virginia non-MSA

Overall, the geographic distribution of home mortgage loans is adequate. In evaluating the geographic distribution of home loans in the WV Non-MSA, it is important to note that the AA's low-income census tracts contain only 43 owner-occupied housing units. Based on this data, we placed significantly more emphasis on performance in moderate-income geographies.

The overall geographic distribution of home purchase loans is adequate. The bank did not originate or purchase any loans in low-income geographies. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these tracts. HNB's market share in the moderate-income census tracts was near to its overall market share for home purchase loans.

The overall geographic distribution of home improvement loans is adequate. The percentage of loans in low-income geographies exceeded the percentage of owner-occupied units in these

tracts. The percentage of loans in moderate-income geographies was somewhat near to the percentage of owner-occupied units in these tracts. The bank did not achieve a market share in either low- or moderate-income geographies.

The overall geographic distribution of home refinance loans is adequate. The percentage of loans in low-income geographies exceeded the percentage of owner-occupied units in these tracts. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these tracts. The bank did not achieve a market share in low-income geographies. HNB's market share in moderate-income census tracts was significantly below its overall market share for home refinance loans.

Small Loans to Businesses

Overall, the geographic distribution of small loans to businesses is good.

Refer to Table 6 in the West Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Charleston MSA

The overall geographic distribution of small loans to businesses is excellent. The bank's geographic distribution of small loans to businesses in 2012 through 2014 was excellent. The percentage of loans made in moderate-income geographies exceeded the percentage of businesses in those geographies. The bank's market share in moderate-income geographies exceeded its overall market share for small loans to businesses. The bank's performance in 2012 through 2013 was consistent with the performance noted in 2014 through 2015.

West Virginia non-MSA

The overall geographic distribution of small loans to businesses is good. In performing our analysis, it is important to note that the AA's low-income census tracts contain only 237 businesses. Based on this data, we placed significantly more emphasis on performance in moderate-income geographies. The percentage of loans in low-income geographies was significantly below the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies exceeded the percentage of businesses in those geographies. The bank's market share in low-income census tracts was significantly below its overall small loans to businesses market share. The bank's market share in moderate-income census tracts exceeded its overall small loans to businesses market share.

Lending Gap Analysis

We reviewed summary reports and maps, and analyzed HNB's home mortgage and small business lending activity over the evaluation period, to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of the bank's lending is good.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is good.

Refer to Tables 8, 9 and 10 in the West Virginia 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.

Charleston MSA

Overall, the borrower distribution of home mortgage loans is good.

The overall borrower distribution of home purchase loans is good. The bank's borrower distribution of home purchase loans during 2014 through 2015 was good. The percentage of loans to low-income borrowers was somewhat near to the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers was near to its overall market share of home purchase loans. The bank's performance in 2012 through 2013 was consistent with performance noted in 2014 through 2015.

The overall borrower distribution of home improvement loans is excellent. The bank's borrower distribution of home improvement loans during 2014 through 2015 was excellent. The percentage of loans to both low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families. Additionally, the bank's market share of loans to both low- and moderate-income borrowers exceeded its overall market share of home improvement loans. The bank's performance in 2012 through 2013 was consistent with the performance noted in 2014 through 2015.

The overall borrower distribution of home refinance loans is adequate. The bank's borrower distribution of home refinance loans during 2014 through 2015 was adequate. The percentage of loans to low-income borrowers was considered adequate. The percentage of loans to moderate-income borrowers was below the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeded the overall market share of refinance loans. The bank's market share of loans to moderate-income borrowers was well below the overall market share of refinance loans. The bank's performance in 2012 through 2013 was consistent with performance noted in 2014 through 2015.

West Virginia non-MSA

Overall, the borrower distribution of home mortgage loans is excellent.

The overall borrower distribution of home purchase loans is good. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was well below its overall market share of home purchase loans. The bank's market share to moderate-income borrowers exceeded its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is excellent. The percentage of loans to low-income borrowers was considered good. The percentage of loans made to

moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low-income and moderate-income borrowers exceeded its overall market share of home improvement loans.

The overall borrower distribution of home refinance loans is excellent when considering market share performance. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers was near to the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers exceeded the overall market share of refinance loans.

Small Loans to Businesses

The overall borrower distribution of small loans to businesses is good.

Refer to Table 11 in the West Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Charleston MSA

The overall borrower distribution of small loans to businesses is good. The bank's borrower distribution of small loans to businesses in 2014 through 2015 was good when considering market share performance. The percentage of small loans to small businesses was below the percentage of small businesses. However, the bank's market share of loans to small businesses exceeded its overall market share of loans to businesses. The bank's performance in 2012 through 2013 was stronger than the performance noted in 2014 through 2015 and was excellent. This difference was due to stronger loan performance to demographic. The percentage of small loans to small businesses was near to the percentage of small businesses. This performance did not have an impact on the overall small loans to businesses conclusion.

West Virginia non-MSA

The overall borrower distribution of small loans to businesses is good when considering market share performance. The percentage of small loans to small businesses was below the percentage of small businesses. The bank's market share of small loans to small businesses exceeded its overall market share of small loans to businesses.

Community Development Lending

Refer to Table 1 Lending Volume in the West Virginia section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Charleston MSA

CD lending was exceptionally strong, and had a significantly positive impact on the overall lending performance in the Charleston AA. This performance compensated for overall good retail lending performance. HNB originated four loans totaling \$18.2 million in qualified CD loans in the AA during the evaluation period. This volume represented 24.1 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated good responsiveness to AA needs. CD loans supported affordable housing initiatives for LMI individuals, and activities that promoted revitalized or stabilized LMI geographies in the AA.

Specific examples of the CD loans originated during this evaluation period include:

- A \$2 million loan to a health care provider to rehabilitate an abandoned building located in a moderate-income census tract for medical purposes. The building is located within a defined development area by the city of Charleston's Urban Renewal Authority. This project will also create low- and moderate-income jobs through the health care tenant.
- A \$1.5 million construction loan to preserve and rehabilitate 28 affordable housing multifamily rental units, utilizing LIHTC awarded by the West Virginia Housing Development Fund.

West Virginia non-MSA

CD lending was exceptionally strong, and had a significantly positive impact on the overall lending performance in the WV Non-MSA. HNB originated three loans totaling \$43.7 million in qualified CD loans in the AA during the evaluation period. This volume represented 82.7 percent of Tier One Capital allocated to the AA.

The bank's CD loans demonstrated good responsiveness to AA needs. CD loans supported affordable housing initiatives for LMI individuals, and supported community service organizations in the AA.

An example of the CD loans originated during this evaluation period include:

- The \$2 million construction loan using LIHTC and Historic Tax Credits to rehabilitate a vacant school building to provide 16 new affordable housing, multifamily units for low-income seniors.

WV Statewide CD Loans

In addition to CD loans originated in AAs, HNB also made 12 CDs loans totaling \$49 million in the greater statewide area with no purpose, mandate or function to serve an AA(s), but are considered given CD lending performance in the AAs.

Product Innovation and Flexibility

The bank's loan product flexibility had a positive impact on its Lending Test conclusions. HNB offers the following flexible loans programs targeted to LMI borrowers.

HNB offers a Federal Housing Authority (FHA) fixed rate residential mortgage product. The FHA mortgage allows for a low down payment and includes a low minimum credit score. The FHA mortgage can also be used in conjunction with Section 8 Homeownership vouchers. The bank made 235 loans for a total of \$26.3 million in the Charleston (\$9.7 million) and the WV non-MSA (\$16.7 million) AAs during the evaluation period.

HNB offers a United States Department of Agriculture (USDA) Rural Development Housing Loan Program. The program features a low minimum credit score and up to 100 percent financing. The bank made 80 loans for a total of \$8.2 million in the Charleston MSA (\$971,000) and the WV non-MSA (\$7.2 million) AAs during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, HNB's performance under the Lending Test in the Morgantown AA and Parkersburg AA is consistent with the bank's overall "Outstanding" performance in the state. Performance in the Huntington AA was weaker than the bank's overall performance in the state, and was good. This was due to weaker geographic distribution. Performance in the limited-scope areas was not significant enough to impact the Lending Test rating in the state. Refer to the Tables 1 through 12 in the West Virginia section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test is rated "Needs to Improve." Based on full-scope review, the bank's performance in the Charleston aa is poor, and excellent in the West Virginia non-MSA AA.

Refer to Table 14 in the West Virginia section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

Charleston MSA

During the evaluation period, HNB made 25 donations, and grants in the Charleston AA totaling \$134,000. This consisted of 25 donations and grants totaling over \$134,000. In addition, four prior period investments with a total book value of \$81,000 remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$215,000 represented 0.3 percent of Tier One Capital allocated to the AA. Based on the very low volume of qualifying investments, the bank's responsiveness to the CD needs in the AA is poor.

West Virginia non-MSA

During the evaluation period, HNB originated 13 investments, donations, and grants in the AA totaling \$4.4 million. This consisted of one investment totaling \$4.3 million, with 12 donations and grants totaling over \$33,000. In addition, three prior period investments with a total book value of \$27,000 remained outstanding at the end of the evaluation period. These prior period investments provide continued benefit to the AA. Total investments of \$4.4 million represented 8.4 percent of Tier 1 Capital allocated to the AA. The bank's responsiveness to the identified

needs of the AA is adequate, with affordable housing needs especially addressed. In terms of dollar volume, 100 percent of the bank's investments, donations, and grants were allocated to affordable housing, which is an identified need.

Conclusions for Area Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the Investment Test in the Huntington AA, is stronger than the bank's "Needs to Improve" performance under the Investment Test in West Virginia, and was considered excellent. In the Morgantown and Parkersburg AAs, HNB's performance is weaker than the bank's overall performance in the state and is considered very poor. Performance differences were due to investment levels, and further support the Investment Test rating in the state.

Refer to Table 14 in the West Virginia section of appendix D for the facts and data that supports this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

HNB's performance under the Service Test in the State of West Virginia is rated "Outstanding." Based on full-scope reviews, performance in the Charleston MSA and West Virginia Non-MSAs was excellent.

Retail Banking Services

Refer to Table 15 in the West Virginia section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Charleston AA

HNB's branch distribution in the AA is excellent. Branches are readily accessible to essentially all portions of the AA. The bank had seven branches in the AA at the end of the evaluation period. There are no low-income census tracts in the AA. The bank had three branches in moderate-income geographies, which exceeded the population percentage.

Branch openings and closings have generally not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. One branch was opened and one closed in middle-income geographies during the evaluation period. The branch closure was due to a periodic analysis of branches' proximity to other branches, demographic characteristics, customer traffic patterns, and financial performance.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in

the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

West Virginia Non-MSA

HNB's branch distribution in the AA is excellent. Branches are readily accessible to geographies and individuals of different income levels. HNB had 12 branches in the AA at the end of the evaluation period. The bank had one branch in a low-income CT, which exceeded the population percentage. The bank had three branches in moderate-income geographies, which exceeded the population percentage.

The bank did not open or close any branches in this AA during the evaluation period.

HNB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

Charleston AA

HNB's performance in providing CD services in the Charleston AA is good. The bank demonstrates a relatively high level of providing community development services. Thirty-four employees participated in 58 CD activities with eight organizations, totaling 490 hours, which included four leadership positions. The bank's efforts demonstrated good responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups. Noted community needs are primarily affordable housing, community health services and community food and clothing needs. Service efforts focused on providing financial education to children in primarily LMI schools. Additional efforts focused on revitalization. One employee provided 237 hours of board of director service to an economic development/revitalization organization.

One employee provided 237 hours of Board service to West Side Main Street (WSMS) for activities that promote small business economic development, business district revitalization, and/or create jobs for LMI individuals and/or benefit LMI areas.

One employee provided 22 hours of Board service to the YWCA of Charleston, including service on the fund development committee. The YWCA's homeless shelter provides shelter for LMI individuals and families. Transitional housing is provided for those transitioning to self-sufficiency. This YWCA also addresses critical needs in the community, including elder abuse, domestic violence, and financial counseling.

West Virginia Non-MSA

HNB's performance in providing CD services in the WV Non-MSA AA is good. The bank demonstrates a relatively high level of providing community development services. Forty-eight employees participated in 90 CD activities with 12 organizations, totaling 741 hours, which included eight leadership positions. The bank's efforts demonstrated good responsiveness and a commitment to community needs by providing technical assistance on financial and banking related matters to community groups and low- and moderate-income persons and families. Noted community needs are economic development and business support, affordable housing, and community services for LMI individuals. Efforts primarily focused in providing 292 hours of financial education to students in three primarily LMI schools. One employee also provided financial training and assistance to LMI individuals unable to pay for energy bills. Employees provided 316 hours of board of director service to four community service oriented organizations. Employees also provided 124 hours of board of director service to organizations with an affordable housing focus, an identified community need, in addition to 10 hours of fundraising for Habitat for Humanity.

One employee provided six hours by service on the board of directors for Augusta Development Council (ADC). ADC is focused on developing 1-4 family residences for Low and Moderate-Income families. One of the most recent projects is an LMI build out in Fairmont, WV.

Three employees provided 214 total hours of Board service to the United Way of Randolph County, the United Way of Harrison County, and the United Way of Marion County. These United Ways primarily fund organizations that provide CD services to a majority LMI individuals. Board service included sitting on the Grants or Allocation Committees deciding on funding for Community Service Organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Huntington, Morgantown, and Parkersburg AAs is weaker than the bank's overall "Outstanding" performance in West Virginia and was considered adequate. This performance was due to weaker branch distribution. Performance differences in the limited scope AAs were not significant enough to affect the overall state rating. Refer to Table 15 in the West Virginia section of appendix D for the facts and data that support these conclusions.

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): 1/01/12 to 12/31/15 Investment and Service Tests and CD Loans: 1/01/12 to 12/31/15	
Financial Institution	Products Reviewed	
Huntington National Bank (HNB) Columbus, Ohio	Home Purchase, Home Improvement , and Home Refinance Loans; Small Business and Small Farm Loans; Community Development Loans, Qualified Investments, and Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Huntington Community Development Corporation (HCDC)	Subsidiary	Qualified Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Multi-state MSAs Cincinnati Ohio- Kentucky- Indiana MMSA Weirton-Steubenville West Virginia-Ohio MMSA Wheeling West Virginia- Ohio MMSA Youngstown-Warren-Boardman Ohio-Pennsylvania MMSA State of Florida Naples-Marco Island MSA # 34940 State of Indiana Indianapolis MSA # 26900 Lafayette AA # 29140 Fort Wayne # 23060 Anderson MSA # 11300	Full-Scope Full-Scope Full-Scope Full-Scope Full-Scope Full Scope Limited-Scope Limited-Scope Limited-Scope	Boone, Kenton, and Campbell County Kentucky; Hamilton, Butler, Clermont and Warren County Ohio Hancock County West Virginia; Jefferson County Ohio Belmont County Ohio; Ohio County West Virginia Entire MSA Entire MSA Boone, Hamilton, Hendricks, Johnson, Madison, and Marion Tippecanoe County Allen County Madison County

<p>State of Michigan Detroit MD #19820 Warren Farmington Hills MD #19820 Michigan Non-MSA</p> <p>Ann Arbor MSA # 11460 Bay City MSA # 13020 Grand Rapids MSA # 24340 Flint MSA # 22420 Holland MSA # 26100 Kalamazoo MSA # 28020</p> <p>Jackson MSA # 27100 Lansing MSA # 29620</p> <p>Midland MSA # 33260 Monroe MSA # 33780 Muskegon MSA #34740 Niles MSA # 35660 Saginaw MSA # 40980 South Bend MSA # 43780</p>	<p>Full-Scope Full-Scope Full-Scope</p> <p>Limited-Scope Limited Scope Limited-Scope Limited-Scope Limited-Scope</p> <p>Limited-Scope Limited-Scope</p> <p>Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope</p>	<p>Entire MSA Entire MSA Allegan, Alpena (added 4/30/15), Antrim, Branch (added 4/1/2013), Charlevoix, Chippewa, Crawford, Emmet, Grand Traverse, Gratiot (added 6/12/2014, Ionia, Kalkaska, Leenanau, Lenawee, Manistee, Mecosta, Newaygo, Oceana, Ocoola, Ostego (added 8/20/2012),Shiawassee (added 8/13/2012),St. Joseph (added 3/18/2013), Wexford (added 10/22/2013), Midland (added 9/12/2014) Counties</p> <p>Washtenaw County Bay County (added 3/3/2014) Kent, Ionia (2012-2013), Montcalm, and Ottawa Counties Genesee County (added 8/13/2012) Ottawa, Van Buren (added 5/1/2014), Clinton (added 5/17/2012), Eaton (added 2/18/2013) Counties.</p> <p>Jackson County (added 8/20/2012) Clinton (added 5/15/2012), Eaton (added 2/18/2013), Ingham (added 2/11/2013) Counties</p> <p>Midland County (added 9/12/2014)</p> <p>Entire MSA Entire MSA Entire MSA Entire MSA Entire MSA</p>
<p>State of Ohio Columbus MSA # 18140 Cleveland MSA # 17460</p> <p>Akron MSA # 10420 Canton MSA # 15940 Dayton MSA# 19340 Lima MSA #30620 Ohio Non-MSA</p> <p>Sandusky MSA # 41780 Springfield MSA # 44220 Toledo MSA # 45780</p>	<p>Full-Scope Full-Scope</p> <p>Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope</p> <p>Limited-Scope Limited-Scope Limited-Scope</p>	<p>Entire MSA Entire MSA</p> <p>Entire MSA Entire MSA Greene, Miami, Montgomery Counties Entire MSA Ashland, Ashtabula, Columbia, Defiance, Erie, Fayette, Guernsey (added 2/28/2014), Hancock, Hardin, Harrison, Henry, Logan, Marion, Muskingum, Ottawa, Paulding, Putnam, Ross, Sandusky, Scioto (removed 1/21/2015), Seneca, Tuscarawas, Washington (added 2/28/2014), Wayne, Williams, Wyandot Counties Erie County (2012-2013) Entire MSA Fulton, Lucas, Ottawa (2012-2013), Wood Counties</p>
<p>State of Pennsylvania Pittsburg MSA #38300</p> <p>Erie MSA # 21500 PA Non-MSA</p>	<p>Full-Scope</p> <p>Limited-Scope Limited-Scope</p>	<p>Allegheny, Beaver, Butler, Washington, Westmoreland Counties Entire MSA Lawrence County</p>
<p>State of West Virginia Charleston MSA # 16620 West Virginia Non-MSA</p> <p>Huntington MSA # 26580 Morgantown MSA #34060 Parkersburg MSA # 37620</p>	<p>Full-Scope Full Scope</p> <p>Limited-Scope Limited-Scope Limited-Scope</p>	<p>Kanawha, Putnam (2012-2-2013) Counties Monongalia, Wood, Harrison, Lewis, Marion, Randolph, Ritchie Counties Cabell, Putnam (2014-2015), Wayne Counties Monongalia Wood</p>

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS Huntington National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Huntington National Bank	High Satisfactory	Outstanding	Outstanding	Outstanding
Multistate Metropolitan Area or State:				
Cincinnati MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Weirton MMSA	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory
Wheeling MMSA	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Youngstown MMSA	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Florida	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Indiana	Outstanding	Outstanding	High Satisfactory	Outstanding
Michigan	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Ohio	High Satisfactory	Outstanding	Outstanding	Outstanding
Pennsylvania	Outstanding	Outstanding	Outstanding	Outstanding
West Virginia	Outstanding	Needs to Improve	Outstanding	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

OH-KY-IN Multistate (17140) Cincinnati, OH-KY-IN Multistate MMSA

Demographic Information for Full Scope Area: Cincinnati AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	463	12.10	23.11	39.09	24.84	0.86
Population by Geography	1,949,427	6.79	19.27	42.14	31.20	0.60
Owner-Occupied Housing by Geography	511,549	2.99	15.68	45.69	35.64	0.00
Business by Geography	124,940	5.67	20.24	39.25	34.79	0.06
Farms by Geography	3,659	2.19	11.42	53.98	32.41	0.00
Family Distribution by Income Level	493,319	20.40	16.87	20.86	41.87	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	183,898	11.83	28.28	43.38	16.50	0.01
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		67,016 72,400 12%	Median Housing Value Unemployment Rate (2010 US Census)		163,416 3.80%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

HNB's AA in the Cincinnati-Middletown MMSA consists of entire counties in Kentucky (Boone, Kenton, and Campbell), and four counties in Ohio (Hamilton, Butler, Clermont, and Warren). This is the portion of the MMSA where the bank has offices. The AA is comprised of 56 low-income, 107 moderate-income, 181 middle-income, 115 upper-income and four CTs labeled NA.

HNB has 38 branches within the AA. As of June 30, 2015 FDIC Deposit Market Share Report, the bank ranked fourth within the AA with total deposits of 2.9 percent market share. HNB's deposits totaled \$2.6 billion. Competitors in the order of combined deposit market share of 82.7 percent were US Bancorp, Fifth Third Bancorp and PNC Bank.

The Cincinnati AA is located at the intersection of Kentucky, Indiana, and Ohio. Hamilton County, Ohio contains Cincinnati, the primary city in the MMSA, and roughly 40 percent of the MMSA's population lives within the county. The top employers in the market are The Kroger Co., The University of Cincinnati, Cincinnati Children's Hospital Medical Center, TriHealth, Inc., and Proctor & Gamble. Between 2014 and 2015, the majority of all job sectors showed increases in employment, with only Information, Government, and Other Services showing declines.

Economic conditions were still in a period of recovery during the 2012 through 2015 evaluation period, but the market was mostly stabilized by 2015. Unemployment hovered around 5 percent for most of the 2000's, then doubled to nearly 10 percent during the recession before falling down to pre-recession levels by 2014. Since the beginning of 2000, most jobs were lost in the Information, Manufacturing, Mining, and Production sectors, while professional and financial services have seen some of the greatest increases.

According to the 2010 U.S. Census the median housing price was \$163,416 and 15.7 percent of the housing units in moderate income geographies were owner-occupied. The Department of Housing and Urban Development noted that housing demand in the market for both sales and rental units of 20,000 at the beginning of 2015, exceeded production of 3,100. The majority of housing demand in the AA exist outside of Hamilton County, particularly for housing sales.

The identified needs for the Cincinnati area include: Economic Development, Affordable Housing, and Improvement in Transportation and Health Services. These issues are covered in the scope of a plan called 'PLAN Cincinnati.' It is the culmination of an interactive planning process involving a cross-section of community residents and leaders. The result of those efforts is a long-range plan to promote growth, protect the environment and influence future development in Cincinnati.

The unemployment rate in the Cincinnati-Middletown MMSA decreased by 41 percent between the time period of 2012-2015, from 7.1 percent in 2012 to 4.2 percent in 2015. The count of unemployed workers in the market fell by 40,606 according to the US Department of Labor, Bureau of Labor Statistics. The median family income for the AA was \$67,016, and the FFIEC adjusted median family income for 2015 was \$72,000. Twelve percent of households in the AA were below the poverty level.

According to aggregate HMDA, 455 lenders originated and purchased home mortgage loans within the AA during 2014. HNB was rated eighth within the AA with a number and dollar market share of 2.7 and 3.1 percent, respectively. Deposit competitors include, Union Savings Bank, Wells Fargo, Guardian Savings Bank FSB, Fifth Third Bank, and US Bank.

Large employers in the MMSA are University of Cincinnati, Kroger Company, Proctor & Gamble, Tri-Health, Gap Inc., State Farm Mutual Automobile Insurance Company, Verizon Communications, Nationwide Insurance, and JPMorgan Chase Bank.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The credit needs are affordable housing, housing down payment assistance and basic banking 101. HNB has provided needed financing and educational assistance in this MMSA.

WV-OH Multistate (48260) Weirton-Steubenville, WV-OH MMSA

Demographic Information for Full Scope Area: Weirton AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	6.45	22.58	64.52	6.45	0.00
Population by Geography	100,385	3.88	16.91	73.17	6.05	0.00
Owner-Occupied Housing by Geography	31,220	0.84	13.32	78.72	7.12	0.00
Business by Geography	5,136	8.20	13.45	70.87	7.48	0.00
Farms by Geography	172	1.16	9.30	86.63	2.91	0.00
Family Distribution by Income Level	27,896	20.77	18.26	21.33	39.64	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	10,888	3.46	24.45	67.74	4.34	0.00
Median Family Income		48,367	Median Housing Value		83,426	
FFIEC Adjusted Median Family Income for 2015		53,100	Unemployment Rate (2010 US Census)		4.00%	
Households Below Poverty Level		16%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

HNB's AA consists of the two of the three entire counties that comprise the Weirton-Steubenville MMSA; Hancock County in West Virginia and Jefferson County in Ohio. This is the portions of the MMSA where the bank has offices. The AA is comprised of two low-income, seven moderate-income, 20 middle-income, and two upper-income CTs.

HNB has 10 branches within the AA. As of June 30, 2015 FDIC Deposit Market Share Report, the bank ranked first within the MMSA with total deposits of 24.9 percent market share. HNB's deposits totaled \$374 million. Competitors with less deposit market share were Hancock County Savings Bank FSB, Wesbanco, Inc., PNC Bank, JPMorgan Chase and Company and US Bancorp.

The Weirton MMSA is part of the Pittsburgh Tri-State Combined Statistical Area and consists of Brooke and Hancock Counties in West Virginia and Jefferson County in Ohio. The education and health services sector is the largest sector in the area, accounting for more than 22 percent of nonfarm payrolls. Two of the largest employers in the area are providers of health services: Trinity Health System and Weirton Medical Center. The manufacturing sector is the second largest sector in the market, accounting for 15 percent of nonfarm payrolls. Other top employers in the region are Mountaineer Park Inc., Wal-Mart Stores, Inc., Murray American Energy, Lowes Home Center, Mylan Pharmaceuticals, and Arcelormittal Weirton, Inc. The following Brownfield sites are located within the Weirton-Steubenville AA: Business Development Corporation of the Northern Panhandle, and City of Weirton.

The unemployment rate in the Weirton-Steubenville MMSA decreased by 30.3 percent between the time period of 2012-2015, from 10.9 percent in 2012 to 7.6 percent in 2015. The count of unemployed workers in the market fell by 1,795 according to the US Department of Labor, Bureau of Labor Statistics. According to the 2010 U.S. Census the median housing value in the AA was \$83,426, the median family income in the AA was \$48,367, and FFIEC adjusted median family income for 2015, was \$53,100. Sixteen percent of the households in the AA were below the poverty level.

According to aggregate HMDA, 112 lenders originated and purchased home mortgage loans within the AA during 2014. HNB was rated 1st within the AA with a number and dollar market share of 13.7 and 12.6 percent, respectively. Deposit competitors include, Hancock County Savings Bank, U.S. Bank, First National Bank of PA, PNC Bank, and Wells Fargo.

The Federal Reserve Bank of Cleveland surveyed community leaders across the Fourth District, which includes Ohio, western Pennsylvania, the northern panhandle of West Virginia, and eastern Kentucky, regarding challenges facing their communities. The issues that top their list of concerns are jobs, affordable housing, and the relationship between vacant properties and budgetary cuts and financing issues at the state government level.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The credit need is affordable housing, economic development and homebuyer education. The needs specifically identified in the Weirton-Steubenville area include affordable housing, a downtown redevelopment strategy, healthcare access for the uninsured and underinsured. Local banks are supportive in providing financing and lending expertise to the families and businesses of the MMSA.

WV-OH Multistate (48540) Wheeling, WV-OH MMSA

Demographic Information for Full Scope Area: Wheeling MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	38	10.53	18.42	44.74	26.32	0.00
Population by Geography	114,843	4.23	12.04	51.67	32.06	0.00
Owner-Occupied Housing by Geography	34,786	2.82	11.02	56.62	29.54	0.00
Business by Geography	7,410	11.71	13.87	41.21	33.20	0.00
Farms by Geography	309	1.62	3.24	66.99	28.16	0.00
Family Distribution by Income Level	31,171	18.92	18.79	20.71	41.57	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	11,755	7.68	17.82	57.66	16.84	0.00
Median Family Income		48,620	Median Housing Value		90,681	
FFIEC Adjusted Median Family Income for 2015		54,000	Unemployment Rate (2010 US Census)		3.22%	
Households Below Poverty Level		16%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

HNB's AA consists of two of the three entire counties that define the Wheeling MMSA; Belmont County in Ohio and Ohio County in West Virginia. This is the portion of the MMSA where the bank has offices. The AA is comprised of four low-income, seven moderate-income, 17 middle-income, and ten upper-income CTs.

HNB has five branches within the AA. As of June 30, 2015 FDIC Deposit Market Share Report, the bank ranked fifth within the MMSA with total deposits of 6.1 percent market share. HNB's deposits totaled \$202 million. Competitors in the order of combined deposit market share of 71.7 percent were Wesbanco, Inc., Belmont Savings Bank, United Bancshares, Inc., and Main Street Financial Services Corp.

Wheeling is located in Ohio County in West Virginia. Located almost entirely in Ohio County, of which it is the county seat, it lies along the Ohio River in the foothills of the Appalachian Mountains. Due to its location along major transportation routes, including the Ohio River, National Road, and the B&O Railroad, Wheeling became a manufacturing center in the late nineteenth century. After experiencing the closing of factories and substantial population loss following World War II, Wheeling's major industries now include healthcare, education, law and legal services, entertainment and tourism, and energy. Major employers include Ohio Valley Medical Center, WesBanco, Wheeling Hospital Inc., Wheeling Island Race Track & Gaming Center, Kroger, Arch Coal, American Electric Power, Rite Aid of West Virginia, and Consolidated Coal Company. Brownfield sites are located in The City of Wheeling within this AA.

The economic trends in Ohio and Belmont counties have been quite different over the course of the past several years. Belmont County, Ohio, accounted for the majority of the region's job losses during the Great Recession, as the county saw a cumulative employment decline of nine percent (2,200 jobs) over the course of the economic downturn. The county's economic recovery was generally lackluster but has picked up more recently. By comparison, Ohio County endured a moderate rate of job losses during the economic downturn (3.7 percent cumulatively), but at the same time has experienced only marginal gains in employment over the past few years.

The Wheeling metro area eclipsed its December 2007 employment level early in 2014, but by June, the metro area's employment had fallen back below this benchmark by about one percent. Nevertheless, the area's unemployment rate ended two-tenths of a percentage point below the national average in 2014, and inflation-adjusted average weekly wages rose more than seven percent during the year.

The unemployment rate in the Wheeling MMSA decreased by 24.6 percent between the time period of 2012-2015, from 7.8 percent in 2012 to 5.9 percent in 2015. The count of unemployed workers in the market fell by 1,320 according to the US Department of Labor, Bureau of Labor Statistics. According to the 2010 U.S. Census, the median housing value for the AA was \$90,681, and 11 percent of the homes in moderate-income geographies were owner-occupied. The median family income was \$48,620, and the FFIEC adjusted family income was \$54,000. Sixteen percent of the households in the AA were below the poverty level.

According to aggregate HMDA, 128 lenders originated and purchased home mortgage loans within the AA during 2014. HNB was rated 5th within the AA with a number and dollar market share of 4.7 and 4.3 percent, respectively. Deposit competitors included Wesbanco Bank, Inc., Belmont Savings Bank, Main Street Bank, and US Bank.

The Federal Reserve Bank of Cleveland surveyed community leaders across the Fourth District, which includes Ohio, western Pennsylvania, the northern panhandle of West Virginia, and eastern Kentucky, regarding challenges facing their communities. The issues that top their list of concerns are: jobs, affordable housing, and the relationship between vacant properties and budgetary cuts and financing issues at the state government level. The specific needs identified in the Wheeling MSA include affordable housing and economic development, to include the retention and attraction of employers who provide well-paying jobs.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The credit needs are affordable housing and economic development, including retention of and attracting employers to provide well-paying employment.

OH-PA Multistate (49660) Youngstown-Warren-Boardman, OH, PA, MMSA

Demographic Information for Full Scope Area: Youngstown MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	155	10.32	21.94	50.97	16.77	0.00
Population by Geography	565,773	6.50	16.07	55.28	22.15	0.00
Owner-Occupied Housing by Geography	171,214	4.24	13.44	58.11	24.21	0.00
Business by Geography	33,492	6.27	12.74	51.24	29.75	0.00
Farms by Geography	1,505	1.59	4.65	71.56	22.19	0.00
Family Distribution by Income Level	151,238	20.09	17.99	22.29	39.63	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	57,590	10.49	23.66	52.45	13.40	0.00
Median Family Income		52,933	Median Housing Value		100,929	
FFIEC Adjusted Median Family Income for 2015		53,700	Unemployment Rate (2010 US Census)		4.50%	
Households Below Poverty Level		15%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

HNB's AA consists of three entire counties within the Youngstown-Warren-Boardman MMSA; Mahoning and Trumbull Counties in Ohio and Mercer County in Pennsylvania. This is the portions of the MMSA where the bank has offices. The AA is comprised of 16 low-income, 34 moderate-income, 79 middle-income, and 26 upper-income CTs.

HNB has 39 branches within the AA. As of June 30, 2015 FDIC Deposit Market Share Report, the bank was ranked first within the MMSA with total deposits of 22.3 percent market share. HNB's deposits totaled \$2 billion. Competitors in the market share with less market share are PNC Bank, F.N.B. Corporation, JPMorgan Chase and Company, The Home Savings and Loan Company, and Talmer Bancorp, Inc.

Located between Cleveland Ohio and Pittsburgh Pennsylvania near the border of the two states, Youngstown is the primary city in the AA. The AA's current economic structure is driven by a manufacturing base as well as other industries such as retail trade, education and health services, and local and state government. Major employers in the area include General Motors, HM Health Partners, Sharon Regional Health, ValleyCare Health System, Youngstown Air Reserve Station, and Youngstown State University.

The Youngstown MMSA has been slow to recover after the recession, which affected the opportunity to lend in the area. Housing permits declined by 53 percent between 2007 and 2010 and have remained at the 2010 levels. Home prices and incomes also declined. Median housing prices in the MSA at the beginning and end of the evaluation period were \$75,000 and \$85,000, respectively. The unemployment rate decreased from 9.5 percent in January 2012 to 6.9 percent in December 2015. Highest unemployment rate during the evaluation period was 10.5 percent reached in January 2013.

The unemployment rate in the Youngstown-Warren-Boardman MMSA decreased by 19 percent between the time periods of 2012-2015, from 8.6 percent to 6.9 percent in 2015. The 48-month unemployed change as of December 2015 was down by 6,756 workers according to the US Department of Labor, Bureau of Labor Statistics. According to the 2010 U.S. Census, the median housing value for the AA was \$100,929, and 12.7 percent of the homes in

moderate-income geographies were owner-occupied. The median family income was \$52,933, and the FFIEC 2015 adjusted family income was \$53,780. Fifteen percent of the households in the AA were below the poverty level.

According to aggregate HMDA, 257 lenders originated and purchased home mortgage loans within the AA during 2014. HNB was rated 2nd within the AA with a number and dollar market share of 7.8 and 8.5 percent, respectively. Deposit competitor included Wells Fargo with a market share of 8.4 percent rated 1st. The depositor competitors with less market share are Home Savings and Loan, First National Bank of PA., Chase, and PNC Bank.

The Federal Reserve Bank of Cleveland surveyed community leaders across the Fourth District, which includes Ohio, western Pennsylvania, the northern panhandle of West Virginia, and eastern Kentucky, regarding challenges facing their communities. The issues that top their list of concerns are jobs, affordable housing, and the relationship between vacant properties and budgetary cuts and financing issues at the state government level.

Housing and property issues, including addressing blight and vacant buildings and land, and developing programs to enable homebuyers and existing homeowners to rehab properties have been identified as some of the most important needs in the city of Youngstown. There is also a need for increased economic development in the area.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The credit need is affordable housing, economic development and homebuyer education. Local banks are supportive in providing financing and lending expertise to the families and businesses of this MMSA.

State of Florida

(34940) NAPLES-IMMOKALEE-MARCO ISLAND, FL

Demographic Information for Full Scope Area: Naples MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	73	8.22	20.55	38.36	32.88	0.00
Population by Geography	321,520	9.05	20.27	43.40	27.27	0.00
Owner-Occupied Housing by Geography	91,397	2.40	16.42	46.03	35.15	0.00
Business by Geography	47,668	2.68	13.33	42.64	41.35	0.00
Farms by Geography	1,284	6.46	18.77	49.22	25.55	0.00
Family Distribution by Income Level	81,135	21.14	18.31	19.04	41.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	32,010	10.31	27.24	44.01	18.44	0.00
Median Family Income		68,556	Median Housing Value		427,396	
FFIEC Adjusted Median Family Income for 2015		66,500	Unemployment Rate (2010 US Census)		3.36%	
Households Below Poverty Level		9%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

HNB's AA consists of one entire county that defines the Naples-Marco Island MSA; Collier County. The AA is comprised of six low-income, 15 moderate-income, 28 middle-income and 24 upper-income CTs.

HNB has one branch within the AA. As of the June 2015 FDIC Deposit Market Share Report, the bank ranked 31st within the AA. HNB's deposits totaled \$50 million with 0.4 percent deposit market share. The five top competitors in the order of combined deposit market share of 57.5 percent were Fifth Third Bank, Wells Fargo Bank, KeyBank National Association, Bank of America, and TGR Financial, Inc.

The City of Naples is located on the Gulf of Mexico in Southwest Florida, and it is the cultural and activity center of Collier County. The City has a permanent population of approximately 19,500, increasing to 33,000 during the peak winter season.

Naples' economy is primarily based on tourism. Along with the Everglades and Marco Island, Naples is part of the popular vacation area named Paradise Coast. The citrus industry is also a significant element of the region's economy. The area is home to Arthrex, a medical equipment manufacturer and Neighborhood America, a technology company. Health Management Associates, a Fortune 1000 company is located just north of the city limits. The county includes several industrial parks and numerous manufacturing firms.

According to the 2010 U.S. Census, unemployment in the AA was 3.4 percent. The median housing value was \$427,396, and 16.4 percent of homes in moderate-income geographies were owner-occupied. The median family income was \$68,556, and the FFIEC 2015 adjusted median family income was \$66,500. Nine percent of households in the AA were below the poverty level.

The professional and business services sector is projected to have one of the highest growth rates for employment in the county. The county's largest employment sectors are those

powered by population growth. In addition, Collier County has the second highest level of patent activity in Southwest Florida. The largest employers in the area are: Health Management Associates, American Business Solutions, NCH Healthcare System, Naples Community Hospital Inc., Collier County, Florida School District, Collier County, Cc Naples Inc., Beasley Broadcast Group Inc., Allen Systems Group Inc., LC Tomarrie li, Classic Bentley Village Inc., Wilsonmiller Inc., Kraft Construction Company Inc., Moorings Park Foundation Inc., Classic Residence Management Inc., Neighborhood America, and Arthrex.

According to aggregate 2014 HMDA data, 558 lenders originated or purchased home mortgage loans within this AA during 2014. HNB is ranked 38th with a number and dollar market share of 0.4 percent and 0.6 percent, respectively. The leading top five deposit competitors include Wells Fargo, Chase, Quicken Loans, Flagstar Bank, and The American Eagle Mortgage Co.

Large employers in the MSA are Health Management Associates, American Business Solutions, NCH Healthcare System, Naples Community Hospital Inc., Collier County, Florida School District, Collier County, Cc Naples Inc., Beasley Broadcast Group Inc., Allen Systems Group Inc., LC Tomarrie li, Classic Bentley Village Inc., Wilson miller Inc., Kraft Construction Company Inc., Moorings Park Foundation Inc., Classic Residence Management Inc., Neighborhood America, and Arthrex.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The primary need is affordable housing and basic banking. Naples MSA has one of the highest populations of the underbanked in Florida. The population in Immokalee also has significant language barriers with 69 percent being Spanish speakers and 16 percent Haitian origin (Creole speakers). Local banks are meeting the credit needs, but there is significant opportunities for more banks to help meet the credit needs of the community.

State of Indiana

(26900) INDIANAPOLIS-CARMEL-ANDERSON, IN

Demographic Information for Full Scope Area: Indianapolis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	295	16.27	29.49	30.51	23.73	0.00
Population by Geography	1,374,256	10.44	26.16	31.79	31.61	0.00
Owner-Occupied Housing by Geography	341,977	6.79	20.56	35.27	37.38	0.00
Business by Geography	118,377	6.77	20.78	35.48	36.98	0.00
Farms by Geography	2,936	3.78	14.13	45.50	36.58	0.00
Family Distribution by Income Level	336,120	22.98	17.14	19.75	40.14	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	134,838	19.05	37.15	29.10	14.70	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2013 Households Below Poverty Level		66,347 65,100 12%	Median Housing Value Unemployment Rate (2010 US Census)		149,376 4.27%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 FFIEC updated MFI

Demographic Information for Full Scope Area: Indianapolis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	295	15.59	29.49	29.15	25.76	0.00
Population by Geography	1,374,256	9.92	26.23	29.96	33.90	0.00
Owner-Occupied Housing by Geography	341,977	6.37	20.41	32.86	40.37	0.00
Business by Geography	98,520	6.02	20.50	34.20	39.28	0.00
Farms by Geography	2,604	3.30	13.25	42.36	41.09	0.00
Family Distribution by Income Level	336,120	22.24	16.78	19.59	41.39	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	131,149	18.64	37.58	27.44	16.35	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		64,663 68,900 12%	Median Housing Value Unemployment Rate (2010 US Census)		149,376 4.27%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2015 FFIEC updated MFI

HNB AA consists of six of the ten entire counties that comprise the Indianapolis-Carmel-Anderson MSA: Boone, Hamilton, Hendricks, Johnson, Madison, and Marion Counties. The AA is comprised of 48 low-income, 87 moderate-income, 90 middle-income and 70 upper-income CTs.

HNB has 45 branches within the AA. As of the June 2015 FDIC Deposit Market Share Report, the bank was ranked fourth within the MSA with total deposits of 7.6% market share. HNB's deposits totaled \$3 billion. The three top competitors in the order of combined deposit market share of 54.21% were JPMorgan Chase Bank, PNC Bank, and Fifth Third Bank.

The Indianapolis-Carmel-Anderson MSA is located in Central Indiana. Marion County is situated within the MSA, which also contains Indianapolis, the capital of Indiana. The top five

major employers in the MSA are Indiana University Health, St. Vincent Hospital and Health Care Center, Inc., Rolls- Royce plc, Indiana Department of Transportation, and Roche Diagnostics Corporation. Two of the top five come from the Manufacturing sector, two come from Education and Health Services, and one comes from the Government sector.

Before the recession, the MSA's unemployment rate rested at roughly four percent. Unemployment then increased to nearly 9 percent in 2010, but has recently fallen back to pre-recession levels. During 2000 through 2013, the largest declines in employment came from Manufacturing and from Production. The greatest increases came from Professional Business Services, Education, and Health Services. During the exam period, GDP, Per Capita Personal Income, and Housing Permits and Starts for both single- and multi-family homes all generally increased, demonstrating the market's recovery.

During the period from 2010 through 2015, the population of the MSA has increased steadily by roughly 16,000 each year. The majority of this growth has occurred in Marion County, and in Hamilton County, IN, which includes the city of Carmel.

A Community Needs Assessment prepared by the Indiana Community Action Association, Inc. based on client surveys identified the following needs: community services and health insurance for LMI individuals, affordable housing, economic development, and jobs.

The unemployment rate in the Indianapolis-Carmel MSA decreased by 49.6 percent between the time period of 2012-2015, from 8.2 percent in 2012 to 4.1 percent in 2015. The count of unemployed workers in the market fell by 36,291 according to the U.S. Department of Labor, Bureau of Labor Statistics. According to the 2010 U.S. Census, the housing value for the AA was \$145,770, and 12 percent of the homes in moderate-income geographies were owner-occupied. The median family income was \$64,633, and the FFIEC 2015 adjusted median family income was \$68,900. Twelve percent of the households in the AA were below the poverty level.

According to aggregate 2014 HMDA data, 500 lenders originated or purchased home mortgage loans within this AA during 2014. HNB is ranked eighth with a market share of 2.6% and 3.2% for number of loans and total dollar amount, respectively. The leading top five deposit competitors include Well Fargo, Chase, The CIT Group/Sales Financing, Union Savings Bank, and Stonegate Mortgage Corporation.

Large employers in the MSA are Indiana University Health, St. Vincent Hospital and Health Care Center, Inc., Rolls-Royce, Indiana Department of Transportation, and Roche Diagnostics Corporation.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The credit need is affordable housing and down payment assistance. Local Banks are helping to meeting the credit needs of the community through LIHTC investments. HNB has been involved in several tax credit deals.

State of Michigan

(19804) Detroit-Dearborn-Livonia, MI

Demographic Information for Full Scope Area: Detroit-Dearborn-Livonia MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	611	17.51	28.48	23.57	28.81	1.64
Population by Geography	1,820,584	12.53	27.09	25.88	34.50	0.01
Owner-Occupied Housing by Geography	464,603	7.40	21.84	28.50	42.24	0.01
Business by Geography	88,889	10.51	18.99	26.99	42.94	0.57
Farms by Geography	1,636	5.75	16.14	26.28	51.65	0.18
Family Distribution by Income Level	441,506	24.56	15.84	17.67	41.92	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	178,391	21.04	38.60	23.72	16.64	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		52,946 53,700 19%	Median Housing Value Unemployment Rate (2010 US Census)		124,506 7.72%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

HNB AA in the Detroit-Livonia-Dearborn MD consists of Wayne County, which comprises the entire MD. The AA is comprised of 107 low-income, 174 moderate-income, 144 middle-income, 176 upper-income tracts and ten CTs labeled NA. The MD is also part of the Detroit-Warren-Livonia MSA.

HNB has 14 branches within the AA. As of June 30, 2015 FDIC Deposit Market Share Report, the bank ranked 8th within the MD in total deposits with 1.0 percent market share. HNB's deposits totaled \$479 million. The seven top competitors in the order of combined deposit market share of 95.8 percent were JPMorgan Chase and Co., Comerica Incorporated, Bank of American Corporation, PNC Bank, UK Financial Investments Limited, Fifth Third Bancorp and Flagstar Bank, FSB.

The unemployment rate in the MD decreased by 44 percent between the time periods of 2012-2015, from 11.2 percent in 2012 to 6.3 percent in 2015. The count of unemployed workers in the market fell by 17,108 according to the US Department of Labor, Bureau of Labor Statistics. According to the 2010 U.S. Census, the median family income was \$52,946, and the FFIEC adjusted median family income for 2015 was \$53,700. The median family housing value for the AA was \$124,506, and 19 percent of households were below the poverty level.

According to aggregate HMDA, 384 lenders originated and purchased home mortgage loans within the AA during 2014. HNB was rated 19th within the AA with a number and dollar market share of 1.2 and 1.5 percent, respectively. Deposit competitors include, Quicken Loans, Wells Fargo, Chase, Citibank and Flagstar Bank.

Large employers in the MD are General Motors Company, General Motors Co., Fiat Chrysler Automobiles, University of Michigan, US Government, Henry Ford Health System, Beaumont Health System, Trinity Health and Detroit Medical Center. While the Detroit Region remains the center of the automotive world, several of its fastest growing industries are in sectors as diverse as health care, defense, aerospace, information technology and logistic.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The credit need is affordable housing, down payment assistance and housing support programs. Local Banks are helping to meet the credit needs of the community but there is great opportunity for more assistance.

State of Michigan (99999) NON-MSA MICHIGAN

Demographic Information for Full Scope Area: MI non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	258	0.39	10.08	66.28	20.54	2.71
Population by Geography	1,008,122	0.19	9.01	65.35	24.40	1.05
Owner-Occupied Housing by Geography	312,384	0.09	7.46	66.59	25.84	0.00
Business by Geography	61,512	0.57	9.03	64.17	26.16	0.07
Farms by Geography	5,360	0.04	3.77	68.69	27.50	0.00
Family Distribution by Income Level	271,099	17.66	17.58	22.42	42.35	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	95,533	0.32	12.94	69.44	17.30	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		51,187 54,700 13%	Median Housing Value Unemployment Rate (2010 US Census)		140,234 5.30%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2015 FFIEC updated MFI

Demographic Information for Full Scope Area: MI non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	228	0.44	8.77	68.86	19.74	2.19
Population by Geography	887,025	0.21	7.99	67.57	23.73	0.50
Owner-Occupied Housing by Geography	275,012	0.11	6.50	68.20	25.20	0.00
Business by Geography	70,038	0.56	7.77	65.46	26.16	0.05
Farms by Geography	5,297	0.06	4.02	70.44	25.49	0.00
Family Distribution by Income Level	238,517	17.53	17.93	22.51	42.02	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	84,582	0.36	11.53	71.60	16.51	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2013 Households Below Poverty Level		51,613 51,700 13%	Median Housing Value Unemployment Rate (2010 US Census)		143,261 5.39%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 FFIEC updated MFI

HNB's AA in Non-MSA Michigan consists of the following counties in Michigan: Allegan, Alpena, Antrim, Branch, Charlevoix, Chippewa, Crawford, Emmet, Grand Traverse, Gratiot, Ionia, Kalkaska, Leelanau, Lenawee, Manistee, Mecosta, Newaygo, Oceana, Osceola, Otsego, Shiawassee, St. Joseph, and Wexford. This is the portion of the Non-MSA Michigan (MI Non-MSA) where the bank has offices. The AA is comprised of one low income, 26 moderate-income, 171 middle-income, 53 upper-income tracts and seven CTs labeled NA.

HNB has 40 branches within the MI Non-MSA AA. As of June 30, 2015 FDIC Deposit Market Share Report, the bank ranked 3rd within the MSA in total deposits with 9.4% market share. HNB's deposits totaled \$1 billion. The two top competitors in the order of combined deposit market share of 30.2% were Chemical Financial Corporation and Fifth Third Bancorp.

The unemployment rate in the MI Non-MSA AA decreased by 53 percent from 2012 of 9.1% to 2015 of 4.3%. The count of unemployed workers in the market fell by 29,753 according to the

U.S. Department of Labor, Bureau of Labor Statistics. According to 2010 U.S. Census data, the median housing value for the AA was \$140,234, and the 7.5 percent of the homes in moderate-income geographies were owner-occupied. The median family income was \$51,178, and the FFIEC 2015 adjusted median family income was \$54,700. Thirteen percent of the households in the AA were below the poverty level.

According to aggregate HMDA, 451 lenders originated and purchased home mortgage loans within the AA during 2014. HNB was rated 6th within the AA with a number and dollar market share of 4.4 and 4.3 percent, respectively. Deposit competitors include, Fifth Third, Wells Fargo, Chemical Bank, Chase, and Quicken Loans.

Large employers in the MI Non-MSA are Parker Hannifin Corporation, Van-Rob Kirchhoff, University of MI-Ann Arbor, General Motors Technical Center, Detroit Receiving Hospital, Spectrum Health Blodgett Hospital, Sylvan, and Dow Chemical Company. There are 19 Fortune 500 companies headquartered in Michigan.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The credit need is affordable housing, down payment assistance and housing support programs. Local Banks are helping to meet the credit needs of the community but there is great opportunity for more assistance.

State of Michigan (47664) Warren-Troy-Farmington Hills MD

Demographic Information for Full Scope Area: Warren MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	689	5.22	20.75	45.86	27.14	1.02
Population by Geography	2,475,666	4.31	20.12	46.54	28.99	0.04
Owner-Occupied Housing by Geography	757,307	2.59	18.58	48.47	30.35	0.00
Business by Geography	175,975	4.58	19.13	42.05	33.84	0.40
Farms by Geography	5,379	2.62	18.57	53.54	25.06	0.20
Family Distribution by Income Level	660,775	20.29	18.26	21.47	39.99	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	254,713	7.46	29.62	47.14	15.78	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		75,314 77,300 9%	Median Housing Value Unemployment Rate (2010 US Census)		189,489 5.42%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

HNB's AA in the Warren AA consists of Macomb, Oakland, Lapeer, Livingston, and St. Clair counties. The AA is comprised of 36 low-income, 143 moderate-income, 316 middle-income, 187 upper-income and seven CTs labeled NA.

HNB has 52 branches within the Warren AA. As of June 30, 2015 FDIC Deposit Market Share Report, the bank ranked seventh within the MD in total deposits with 7.0 percent market share. HNB's deposits totaled \$4.7 billion. The six top competitors in the order of combined deposit market share of 72.4 percent were Bank of American Corporation, JPMorgan Chase and Co., Comerica Incorporated, PNC Bank, Flagstar Bank, FSB, and Fifth Third Bancorp.

The unemployment rate in the Warren AA decreased by 44 percent between the time periods of 2012-2015, from 8.6 percent in 2012 to 4.8 percent in 2015. The count of unemployed workers in the market fell by 54,081 according to the US Department of Labor, Bureau of Labor Statistics. According to the 2010 U.S. Census Data the median housing value for the AA was \$189,489, and 18.6 percent of the homes in moderate-income geographies were owner-occupied. The median family income was \$75,314, and the adjusted 2015 median family income was \$77,300. Nine percent of the households in the MD were below the poverty level.

According to aggregate HMDA, 525 lenders originated and purchased home mortgage loans within the AA during 2014. HNB was rated 12th within the AA with a number and dollar market share of 2.0 and 2.3 percent, respectively. Deposit competitors include, Quicken Loans, Wells Fargo, Chase, Citigroup and Flagstar Bank.

Large employers in the AA are Ally Financial, General Motors Co., American Axle and Manufacturing Holding, Inc., DTE Energy Company, Kelly Services, US Government, Beaumont Health System, Trinity Health and Detroit Medical Center.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The credit needs identified were affordable housing and local small business development. It was also noted that HNB has been very helpful in providing needed financing and expertise to local small businesses in the area.

State of Ohio

State of Ohio (17460), Cleveland-Elyria MSA

Demographic Information for Full Scope Area: Cleveland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	636	16.35	21.23	36.16	25.47	0.79
Population by Geography	2,077,240	10.38	17.42	38.71	33.49	0.01
Owner-Occupied Housing by Geography	575,920	5.68	13.81	41.98	38.53	0.01
Business by Geography	138,941	7.53	13.00	38.46	40.64	0.37
Farms by Geography	3,699	2.54	7.81	44.44	45.17	0.03
Family Distribution by Income Level	535,574	21.71	17.29	20.69	40.30	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	208,889	19.45	25.53	37.15	17.86	0.01
Median Family Income		62,627	Median Housing Value		151,321	
FFIEC Adjusted Median Family Income for 2015		66,100	Unemployment Rate (2010 US		4.82%	
Households Below Poverty Level		13%	Census)			

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

HNB's AA consist of each of the five counties within the Cleveland-Elyria-Mentor MSA; Cuyahoga, Geauga, Lake, Lorain, and Medina Counties. The AA is comprised of 104 low-income, 135 moderate-income, 230 middle-income, 162 upper-income, and five NA CTs.

HNB has 88 branches within the AA. As of June 30, 2015 FDIC Deposit Market Share Report, the bank ranked fifth within the MSA with a total deposit market share of 7.6 percent. HNB's deposits totaled \$4.8 billion. The four top competitors in the order of combined deposit market share of 57.8 percent were KeyCorp, PNC Bank, UK Financial Investment Limited, and Third Federal Savings and Loan of Cleveland.

The unemployment rate for the Cleveland-Elyria-Mentor MSA decreased 35.5 percent during the time period of 2012-2015, from 6.2 percent to 4 percent in 2015. The count of unemployment workers in the market fell by 34,541 according to the U.S. Department of Labor, Bureau of Labor Statistics. According to the 2010 U.S. Census Data the median housing value for the AA was \$151,321, and 13.8 percent of the homes in moderate-income geographies were owner-occupied. The median family income was \$62,627, and the adjusted 2015 median family income was \$66,100. Thirteen percent of the households in the MSA were below the poverty level.

According to aggregate HMDA data, 409 lenders originated or purchased home mortgage loans within the AA during 2014. HNB is ranked 8th with a number and dollar market share of 4.1 percent and 4.4 percent, respectively. The largest deposit competitors include Wells Fargo, Third Federal Savings and Loan, Quicken Loans, First Federal of Lakewood, Fifth Third Bank, Chase, and Howard Hanna Mortgage Services

Large employers in the MSA are the Cleveland Clinic Health System, University Hospitals, Giant Eagle, Inc., Progressive Casualty Company, and General Motors.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The primary needs identified are flexible credit products and affordable housing. The contact indicated that larger financial institutions are very conservative and there are significant opportunities for local banks to meet the community's credit needs. HBN appears to be more of an investor lender.

(18140), Columbus MSA

Demographic Information for Full Scope Area: Columbus MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	414	14.98	23.43	31.64	29.23	0.72
Population by Geography	1,801,709	10.42	19.84	34.92	34.21	0.60
Owner-Occupied Housing by Geography	439,352	5.06	17.12	37.16	40.66	0.00
Business by Geography	127,688	8.23	18.64	32.19	40.58	0.36
Farms by Geography	4,466	3.18	11.55	49.31	35.89	0.07
Family Distribution by Income Level	439,901	20.96	16.94	20.45	41.66	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	166,687	17.06	30.48	35.61	16.84	0.00
Median Family Income	64,914	Median Housing Value		165,896		
FFIEC Adjusted Median Family Income for 2015	71,000	Unemployment Rate (2010 US Census)		3.88%		
Households Below Poverty Level	13%					

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

HNB's AA in the Columbus MSA, which consist of seven counties: Delaware, Fairfield, Franklin, Licking, Madison, Pickaway, and Union. This is the portion of the Columbus MSA where the bank as offices. The AA is comprised of 62 low-income, 97 moderate-income, 131 middle-income, 121 upper-income and three CTs labeled NA.

HNB has 85 branches within the Columbus AA. As of June 30, 2015 FDIC Deposit Market Share Report, the bank ranked first within the MSA with total deposits of 30.1 percent market share. HNB's deposits totaled \$7.4 billion. Competitors in the order of combined deposit market share of 52.5 percent were JPMorgan Chase, PNC Bank, Nationwide Bank, Fifth Third Bancorp and Park National Corporation.

The unemployment rate in the Columbus MSA decreased by 37 percent between the time periods of 2012-2015, from 6.1 percent in 2012 to 3.8 percent in 2015. The count of unemployed workers in the market fell by 30,662 according to the US Department of Labor, Bureau of Labor Statistics. According to the 2010 U.S. Census Data the median housing value for the AA was \$165,896, and 17.1 percent of the homes in moderate-income geographies were owner-occupied. The median family income was \$64,914, and the adjusted 2015 median family income was \$71,000. Thirteen percent of the households in the AA were below the poverty level.

According to aggregate HMDA, 448 lenders originated and purchased home mortgage loans within the AA during 2014. HNB was rated 5th within the AA with a number and dollar market share of 6.2 and 6.3 percent, respectively. Deposit competitors include, Union Savings, Wells Fargo, Chase, Citigroup and Flagstar Bank.

Large employers in the MSA are American Honda Motor Company, Whirlpool, Abbott Nutrition, JPMorgan Chase, and The Ohio State University, US Government. OhioHealth, Kroger Corporation, Limited Bands and Wal-Mart.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The credit need is affordable housing and economic development. HNB has been very helpful in providing needed financing in this MSA.

State of Pennsylvania

(38300) Pittsburgh, PA MSA

Demographic Information for Full Scope Area: Pittsburgh MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	656	6.86	22.56	46.49	21.95	2.13
Population by Geography	2,150,738	4.27	17.32	49.29	28.68	0.45
Owner-Occupied Housing by Geography	639,696	2.22	15.05	52.42	30.30	0.00
Business by Geography	165,921	4.18	13.48	48.49	33.25	0.60
Farms by Geography	3,965	1.34	9.38	62.19	27.01	0.08
Family Distribution by Income Level	562,326	19.29	17.75	21.81	41.16	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	208,238	6.71	26.78	50.59	15.92	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		62,376 69,700 12%	Median Housing Value Unemployment Rate (2010 US Census)		127,460 3.38%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

HNB's AA consists of five of the seven entire counties within the Pittsburgh MSA: Allegheny County, Beaver County, Butler County, Washington County and Westmoreland County. This is the portions of the MMSA where the bank has offices. The AA is comprised of 45 low-income, 148 moderate-income, 305 middle-income, 144 upper-income and 14 CTs labeled NA.

HNB has 37 branches within the AA. As of June 30, 2015 FDIC Deposit Market Share Report, the bank ranked sixth within the MSA with total deposits of 2.5 percent market share. HNB's deposits totaled \$2.8 billion. Competitors in the order of combined deposit market share of 81 percent were PNC Bank, Bank of New York Mellon Corporation, UK Financial Investment Limited, F.N.B. Corporation, and Dollar Bank FSB.

The unemployment rate in the Pittsburgh MSA decreased by 40 percent between the time period of 2012-2015, from 6.9 percent in 2012 to 4.1 percent in 2015. The count of unemployed workers in the market fell by 38,704 according to the US Department of Labor, Bureau of Labor Statistics. According to the 2010 U.S. Census Data the median housing value for the AA was \$127,460, and 15.1 percent of the homes in moderate-income geographies were owner-occupied. The median family income was \$62,376 and the adjusted 2015 median family income was \$69,700. Twelve percent of the households in the MSA were below the poverty level.

According to aggregate HMDA, 488 lenders originated and purchased home mortgage loans within the AA during 2014. HNB was rated 18th within the AA with a number and dollar market share of 1.4 and 1.5 percent, respectively. Deposit competitors include, Well Fargo, PNC Bank, Dollar Bank FSB, First National Bank of PA, and Howard Hanna Mortgage Services.

Large employers in the MSA are UPMC Health System, Giant Eagle, Inc., Highmark Blue Cross and Blue Shield, University of Pittsburgh, Mellon Financial Corp, Wal-Mart Stores, West Penn Allegheny Health System, 84 Lumber Company, Verizon Communications and Alcoa.

The AA's community credit needs were identified by HNB through a strategic planning session, which brought together representatives from Columbus city departments and divisions. Through this process HNB determined priority needs including affordable housing preservation and development, safe sanitary housing, housing for the special needs population and elderly, and economic and community development.

State of West Virginia

(16620) Charleston MSA

Demographic Information for Full Scope Area: Charleston MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	63	0.00	20.63	53.97	25.40	0.00
Population by Geography	248,549	0.00	13.78	58.15	28.07	0.00
Owner-Occupied Housing by Geography	76,859	0.00	11.27	58.86	29.88	0.00
Business by Geography	19,232	0.00	27.31	41.81	30.88	0.00
Farms by Geography	314	0.00	10.19	59.24	30.57	0.00
Family Distribution by Income Level	66,993	18.35	17.46	20.64	43.55	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	23,990	0.00	19.09	64.41	16.50	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2013 Households Below Poverty Level		53,382 57,900 13%	Median Housing Value Unemployment Rate (2010 US Census)		113,086 2.97%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 FFIEC updated MFI

Demographic Information for Full Scope Area: Charleston MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	53	0.00	22.64	56.60	20.75	0.00
Population by Geography	193,063	0.00	17.01	60.52	22.47	0.00
Owner-Occupied Housing by Geography	58,837	0.00	14.28	61.69	24.03	0.00
Business by Geography	12,499	0.00	31.50	44.52	23.98	0.00
Farms by Geography	178	0.00	10.67	71.91	17.42	0.00
Family Distribution by Income Level	51,064	18.63	18.03	21.19	42.15	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	18,720	0.00	23.17	63.78	13.05	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		52,702 59,600 14%	Median Housing Value Unemployment Rate (2010 US Census)		106,848 3.31%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2015 FFIEC updated MFI

HNB assessment area in the Charleston MSA consists of Kanawha County. Due to 2014, OMB changes to MSA delineations; Putnam County was reassigned to the portion of the Charleston MSA where the bank has offices. The AA is comprised of zero low-income, 12 moderate-income, 30 middle-income and 11 upper-income CTs.

HNB has seven branches within the AA. As of June 30, 2015 FDIC deposit data, HNB was ranked third out of 12 depository financial institutions within the MSA with a total deposit market share of 15 percent. HNB's deposits totaled \$712 million. The two top competitors in the order of deposit market share of 48.8 percent were Branch Banking and Trust Company (BB&T) and United Bancshares, Inc.

The unemployment rate in the Charleston MSA decreased 17 percent between the time-period of 2012-2015 from 6.3 percent in 2012 to 5.2 percent in 2015. The count of unemployed workers in the market fell by 1,882 during the exam period, according to the US Department of Labor, Bureau of Labor Statistics. According to the 2010 U.S. Census Data the median housing value for the AA was \$113,086, and 11.27 percent of the homes in moderate-income geographies were owner-occupied. The median family income was \$53,382 and the adjusted 2015 median family income was \$57,900. Thirteen percent of the households in the were below the poverty level.

According to aggregate HMDA data, 139 lenders originated or purchased home mortgage loans within the AA during 2014. HNB is ranked fifth with a number and dollar market share of 4.98 percent and 5.35 percent, respectively. The largest deposit competitors include City National Bank of WV, BB&T, Chase, and Quicken Loans.

Large employers in the MSA are Charleston Area Medical Center, Herbert J. Thomas Memorial Hospital Association, City of Charleston Municipality, Charleston Area Medical Center and West Virginia Department of Highways.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The primary needs identified are affordable rental housing and affordable elder housing units, as well as improvements to transportation and local infrastructure. The contact indicated that local financial institutions are responsive and supportive of community needs.

State of West Virginia (99999) WV NON-MSA

Demographic Information for Full Scope Area: WV non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	55	1.82	9.09	58.18	30.91	0.00
Population by Geography	181,743	0.72	7.65	60.17	31.46	0.00
Owner-Occupied Housing by Geography	54,230	0.08	5.12	61.75	33.04	0.00
Business by Geography	9,907	2.40	13.45	52.32	31.84	0.00
Farms by Geography	294	0.34	5.10	65.99	28.57	0.00
Family Distribution by Income Level	48,853	19.14	16.66	19.79	44.42	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	17,487	0.81	9.98	66.35	22.87	0.00
Median Family Income		43,503	Median Housing Value		93,983	
FFIEC Adjusted Median Family Income for 2015		48,900	Unemployment Rate (2010 US Census)		2.97%	
Households Below Poverty Level		18%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2015 FFIEC updated MFI

HNB's AA in Non-MSA West Virginia consists of Harrison County, Lewis County, Marion County, Randolph County, and Ritchie County. This is the portions of the AA where the bank has offices. The AA is comprised of one low-income, five moderate-income, 32 middle-income, and 17 upper-income CTs.

HNB has 13 branches within the AA. As of June 30, 2015 FDIC Deposit Market Share Report, the bank ranked second within the AA with total deposits of 16.4 percent market share. HNB's deposits totaled \$497 million. The one Competitor based upon deposit market share of 17.3 percent was MVB Financial Corp. The other competitors in this market with less market share were BB&T Corporation, Wesbanco, JPMorgan Chase, Citizens Bancshares, Inc., and Citizens Financial Corporation.

The unemployment rate in the AA decreased by 7.4 percent between the time period of 2012-2015, from 6.6 percent in 2012 to 6.2 percent in 2015. The count of unemployed workers in the market fell by 1,187 according to the US Department of Labor, Bureau of Labor Statistics. According to the 2010 U.S. Census Data the median housing value for the AA was \$93,983, and 5.1 percent of the homes in moderate-income geographies were owner-occupied. The median family income was \$43,503 and the adjusted 2015 median family income was \$48,900. Eighteen percent of the households in the AA were below the poverty level.

According to aggregate HMDA, 122 lenders originated and purchased home mortgage loans within the AA during 2014. HNB was rated 1st within the AA with a number and dollar market share of 10 and 8.1 percent, respectively. Deposit competitors with less market share include MVB Mortgage, BBT, Wesbanco Bank, Inc., Fairmont Federal Credit Union and Quicken Loans.

Large employers in the AA are Wal-Mart, WV United Health System, Charleston Area Medical Center, Kroger, Mylan Pharmaceuticals, Murray American Energy, Express Modular, STS International and KeyLogic Services.

Our evaluation included making contact with a community member to understand the demographics and primary credit needs of the AA. The credit needs are affordable housing and economic development. Local banks are meeting the credit needs, but there are significant opportunities for more banks to help meet the credit needs of the community.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. 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. [Note: Do not renumber the tables.]

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

Table 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 1. Other Products - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

Table 2. Geographic Distribution of Home Purchase Loans - 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 market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Multifamily Loans - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of

multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 6. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms - 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 market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 9. Borrower Distribution of Home Improvement Loans - See Table 8.

Table 10. Borrower Distribution of Refinance Loans - See Table 8.

Table 11. Borrower Distribution of Small Loans to Businesses - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

Multistate Metropolitan Area(s)

Cincinnati Ohio- Kentucky- Indiana MMSA

Weirton-Steubenville West Virginia-Ohio MMSA

Wheeling West Virginia- Ohio MMSA

Youngstown-Warren-Boardman Ohio-Pennsylvania MMSA

State(s)

State of Florida

State of Indiana

State of Michigan

State of Ohio

State of Pennsylvania

State of West Virginia

Table 1. Lending Volume

LENDING VOLUME												
Geography: MULTISTATE MSAs												
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015												
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Cincinnati MMSA	100.00	7,119	1,230,643	4,512	526,981	29	1,251	32	102,077	11,660	1,758,875	100.00
Weirton MMSA	100.00	1,120	90,356	212	14,462	5	105	1	151	1,337	104,923	100.00
Wheeling MMSA	100.00	431	46,716	169	11,031	1	75	3	2,165	601	57,822	100.00
Youngstown MMSA	100.00	4,220	443,947	2,306	278,167	33	1,124	12	26,496	6,559	723,238	100.00

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MULTISTATE MSAS					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Cincinnati MMSA	2,676	100.00	2.99	2.58	15.68	15.36	45.69	39.01	35.64	43.05	2.48	2.17	2.46	2.37	2.64	
Weirton MMSA	310	100.00	0.84	0.32	13.32	11.94	78.72	81.29	7.12	6.45	7.91	0.00	7.00	8.62	1.59	
Wheeling MMSA	126	100.00	2.82	5.56	11.02	7.14	56.62	58.73	29.54	28.57	3.06	13.04	1.32	2.48	3.62	
Youngstown MMSA	1,335	100.00	4.24	0.82	13.44	7.04	58.11	56.55	24.21	35.58	6.09	11.76	4.39	6.09	6.33	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATE MSAs					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Cincinnati MMSA	288	100.00	2.99	2.78	15.68	17.71	45.69	37.85	35.64	41.67	2.48	3.85	2.49	1.66	3.33	
Weirton MMSA	123	100.00	0.84	0.00	13.32	13.82	78.72	82.11	7.12	4.07	11.62	0.00	16.67	11.58	5.00	
Wheeling MMSA	52	100.00	2.82	3.85	11.02	11.54	56.62	57.69	29.54	26.92	4.74	0.00	3.33	6.92	1.30	
Youngstown MMSA	257	100.00	4.24	2.33	13.44	11.67	58.11	64.20	24.21	21.79	4.87	7.69	4.67	5.15	4.14	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: MULTISTATE MSAs				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cincinnati MMSA	4,150	100.00	2.99	2.17	15.68	14.75	45.69	39.61	35.64	43.47	3.04	2.30	3.26	2.90	3.17
Weirton MMSA	687	100.00	0.84	0.00	13.32	11.06	78.72	81.51	7.12	7.42	23.08	0.00	20.90	24.37	12.82
Wheeling MMSA	252	100.00	2.82	1.59	11.02	5.95	56.62	50.40	29.54	42.06	7.36	0.00	11.11	7.52	6.61
Youngstown MMSA	2,627	100.00	4.24	0.80	13.44	7.42	58.11	58.77	24.21	33.00	11.02	4.29	16.46	10.31	11.39

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MULTISTATE MSAS					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****						
Full Review:																
Cincinnati MMSA	5	100.00	14.88	0.00	28.42	60.00	38.94	40.00	17.75	0.00	1.18	0.00	2.13	1.19	0.00	
Weirton MMSA	0	100.00	15.04	0.00	23.03	0.00	56.19	0.00	5.74	0.00	0.00	0.00	0.00	0.00	0.00	
Wheeling MMSA	1	100.00	13.66	0.00	19.50	0.00	37.21	0.00	29.63	100.00	0.00	0.00	0.00	0.00	0.00	
Youngstown MMSA	1	100.00	10.25	100.00	23.63	0.00	49.04	0.00	17.08	0.00	2.70	25.00	0.00	0.00	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: MULTISTATE MSAs Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015																
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [†]					
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
Cincinnati MMSA	4,510	100.00	5.67	6.67	20.24	23.19	39.25	36.25	34.79	33.88	3.83	4.04	4.85	3.79	3.42	
Weirton MMSA	212	100.00	8.20	13.21	13.45	12.26	70.87	71.70	7.48	2.83	5.01	5.26	6.96	4.93	3.70	
Wheeling MMSA	169	100.00	11.71	4.14	13.87	20.12	41.21	35.50	33.20	40.24	2.55	0.63	2.59	3.21	2.63	
Youngstown MMSA	2,306	100.00	6.27	6.85	12.74	11.62	51.24	50.09	29.75	31.44	7.45	9.62	7.28	7.82	7.01	

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: MULTISTATE MSAS					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Cincinnati MMSA	29	100.00	2.19	6.90	11.42	3.45	53.98	44.83	32.41	44.83	5.33	33.33	0.00	3.03	11.11	
Weirton MMSA	5	100.00	1.16	0.00	9.30	20.00	86.63	80.00	2.91	0.00	0.00	0.00	0.00	0.00	0.00	
Wheeling MMSA	1	100.00	1.62	0.00	3.24	0.00	66.99	100.00	28.16	0.00	0.00	0.00	0.00	0.00	0.00	
Youngstown MMSA	33	100.00	1.59	0.00	4.65	0.00	71.56	84.85	22.19	15.15	10.84	0.00	0.00	12.50	0.00	

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MULTISTATE MSAs					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Cincinnati MMSA	2,676	100.00	20.40	11.97	16.87	24.90	20.86	20.58	41.87	42.54	2.89	2.45	2.87	2.73	3.15	
Weirton MMSA	310	100.00	20.77	7.42	18.26	26.45	21.33	32.90	39.64	33.23	9.24	6.78	12.03	8.68	8.67	
Wheeling MMSA	126	100.00	18.92	4.07	18.79	20.33	20.71	31.71	41.57	43.90	3.71	0.00	2.96	4.65	4.13	
Youngstown MMSA	1,335	100.00	20.09	8.11	17.99	26.60	22.29	25.59	39.63	39.70	6.81	8.11	7.04	5.83	7.09	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MULTISTATE MSAs					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans**	% Families**	% BANK Loans**	% Families**	% BANK Loans**	% Families**	% BANK Loans**						
Full Review:																
Cincinnati MMSA	288	100.00	20.40	13.99	16.87	17.83	20.86	22.03	41.87	46.15	2.66	3.02	2.29	2.27	2.94	
Weirton MMSA	123	100.00	20.77	14.88	18.26	26.45	21.33	25.62	39.64	33.06	11.86	24.24	11.90	8.47	9.80	
Wheeling MMSA	52	100.00	18.92	9.62	18.79	25.00	20.71	23.08	41.57	42.31	5.12	4.00	6.45	3.39	5.56	
Youngstown MMSA	257	100.00	20.09	12.84	17.99	23.35	22.29	22.96	39.63	40.86	5.01	7.02	7.52	2.62	4.66	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MULTISTATE MSAs					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Cincinnati MMSA	4,150	100.00	20.40	9.50	16.87	18.83	20.86	22.76	41.87	48.91	3.63	5.00	3.77	3.23	3.50	
Weirton MMSA	687	100.00	20.77	6.36	18.26	18.34	21.33	25.74	39.64	49.56	25.24	26.83	24.68	27.86	23.81	
Wheeling MMSA	252	100.00	18.92	7.26	18.79	12.50	20.71	25.00	41.57	55.24	8.70	6.56	9.09	7.75	9.60	
Youngstown MMSA	2,627	100.00	20.09	8.26	17.99	19.43	22.29	23.89	39.63	48.41	12.56	13.46	14.11	10.59	12.80	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: MULTISTATE MSAs Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cincinnati MMSA	4,512	100.00	76.70	61.26	75.75	10.97	13.28	3.83	5.44
Weirton MMSA	212	100.00	75.58	68.40	86.79	8.49	4.72	5.01	7.77
Wheeling MMSA	169	100.00	73.72	66.86	91.12	4.14	4.73	2.55	5.54
Youngstown MMSA	2,306	100.00	77.39	66.39	72.64	14.87	12.49	7.45	12.61

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.79% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MULTISTATE MSAs			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Cincinnati MMSA	29	100.00	97.27	75.86	96.55	3.45	0.00	5.33	7.32
Weirton MMSA	5	100.00	98.84	100.00	100.00	0.00	0.00	0.00	0.00
Wheeling MMSA	1	100.00	98.71	100.00	100.00	0.00	0.00	0.00	0.00
Youngstown MMSA	33	100.00	98.21	93.94	96.97	3.03	0.00	10.84	26.47

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.47% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MULTISTATE MSAs			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cincinnati MMSA	25	2,516	79	28,045	104	30,561	100.00	1	4,334
Weirton MMSA	12	176	18	290	30	466	100.00	0	0
Wheeling MMSA	9	710	6	795	15	1,505	100.00	0	0
Youngstown MMSA	12	800	36	9,063	48	9,863	100.00	1	1,342

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MULTISTATE MSAs Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cincinnati MMSA	100.00	38	40.43	0.00	26.31	44.74	28.95	1	8	0	-3	-3	-1	6.79	19.27	42.14	31.20
Weirton MMSA	100.00	10	10.64	10.00	0.00	90.00	0.00	0	1	0	0	-1	0	3.88	16.91	73.17	6.05
Wheeling MMSA	100.00	6	6.38	16.67	0.00	33.33	50.00	0	1	0	0	0	-1	4.23	12.04	51.67	32.06
Youngstown MMSA	100.00	40	42.55	2.50	12.50	60.00	25.00	8	7	0	-1	0	+2	6.50	16.07	55.28	22.15

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Naples MSA	100.00	181	66,754	22	5,107	1	300	0	0	204	72,161	100.00
FL Statewide with no P/M/F to serve an AA(s)	0	0	0	0	0	0	0	2	16,250	2	16,250	0

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples MSA	97	100.00	2.40	1.03	16.42	26.80	46.03	25.77	35.15	46.39	0.32	0.00	0.17	0.19	0.60

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples MSA	2	100.00	2.40	0.00	16.42	50.00	46.03	0.00	35.15	50.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Naples MSA	82	100.00	2.40	2.44	16.42	10.98	46.03	37.80	35.15	48.78	0.50	0.00	0.29	0.46	0.64	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Naples MSA	0	0.00	3.02	0.00	13.85	0.00	39.45	0.00	43.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00								

* Based on 2014 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography [*]				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
Naples MSA	22	100.00	2.68	0.00	13.33	4.55	42.64	31.82	41.35	63.64	0.06	0.00	0.00	0.02	0.11	

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Naples MSA	1	100.00	6.46	0.00	18.77	0.00	49.22	0.00	25.55	100.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Naples MSA	97	100.00	21.14	5.32	18.31	9.57	19.04	5.32	41.50	79.79	0.36	0.00	0.40	0.00	0.44									

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share [†]				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Naples MSA	2	100.00	21.14	0.00	18.31	0.00	19.04	50.00	41.50	50.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Naples MSA	82	100.00	21.14	2.53	18.31	3.80	19.04	6.33	41.50	87.34	0.56	0.81	0.34	0.23	0.68	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [†]	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Naples MSA	22	100.00	81.51	68.18	36.36	31.82	31.82	0.06	0.08

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 9.09% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
			Geography: FLORIDA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Naples MSA	1	100.00	94.39	100.00	0.00	0.00	100.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: FLORIDA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Naples MSA	1	55	2	1,001	3	1,056	100.00	0	0

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: FLORIDA Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Naples MSA	100.00	1	100.00	0.00	0.00	0.00	100.00	0	1	0	0	0	-1	9.05	20.27	43.40	27.27

Table 1. Lending Volume

LENDING VOLUME		Geography: INDIANA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Indianapolis MSA^	79.99	3,369	620,096	1,760	182,431	18	2,167	18	90,170	5,165	894,864	94.71
Limited Review:												
Anderson MSA^^	2.23	104	10,244	40	2,637	0	0	0	0	144	12,881	1.11
Fort Wayne MSA^^	2.49	54	9,906	103	4,750	1	21	3	5,646	161	20,323	0.28
Lafayette MSA	15.29	773	94,279	209	17,343	4	317	1	336	987	112,275	3.89
IN Statewide with no P/M/F to serve an AA(s)	0	0	0	0	0	0	0	4	20,568	0	0	0

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2015.

*** Deposit Data as of June 30, 2015 for Indianapolis MSA and Lafayette MSA, and June 30, 2013 for Anderson MSA and Fort Wayne MSA. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

^ Evaluation period is January 1, 2014 through December 31, 2015.

^^ Evaluation period is January 1, 2012 through December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: INDIANA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						Market Share (%) by Geography [†]				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}						
Full Review:																
Indianapolis MSA [^]	1,960	87.97	5.68	3.78	20.03	20.26	35.60	34.44	38.68	41.53	2.57	3.09	2.61	2.74	2.41	
Limited Review:																
Anderson MSA ^{^^}	16	0.72	1.04	0.00	17.60	25.00	53.57	37.50	27.80	37.50	0.55	0.00	1.19	0.56	0.43	
Fort Wayne MSA ^{^^}	14	0.63	5.52	0.00	21.92	7.14	37.27	35.71	35.29	57.14	0.10	0.00	0.00	0.08	0.15	
Lafayette MSA	238	10.68	0.88	0.42	23.59	24.37	51.10	52.52	24.43	22.69	1.49	3.03	2.01	1.60	0.74	

* Based on 2014 Peer Mortgage Data -- US and PR for the Indianapolis MSA and Lafayette MSA, and 2013 Peer Mortgage Data for the Anderson MSA and Fort Wayne MSA.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^] Evaluation period is January 1, 2014 through December 31, 2015.

^{^^} Evaluation period is January 1, 2012 through December 31, 2013.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: INDIANA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA^	170	80.19	5.68	4.12	20.03	20.00	35.60	34.71	38.68	41.18	3.21	1.61	4.71	2.67	3.27
Limited Review:															
Anderson MSA^^	4	1.89	1.04	0.00	17.60	0.00	53.57	100.00	27.80	0.00	0.49	0.00	0.00	0.96	0.00
Fort Wayne MSA^^	1	0.47	5.52	0.00	21.92	0.00	37.27	0.00	35.29	100.00	0.21	0.00	0.00	0.00	0.61
Lafayette MSA	37	17.45	0.88	2.70	23.59	18.92	51.10	62.16	24.43	16.22	1.79	14.29	0.00	2.56	0.00

* Based on 2014 Peer Mortgage Data -- US and PR for the Indianapolis MSA and Lafayette MSA, and 2013 Peer Mortgage Data for the Anderson MSA and Fort Wayne MSA.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^ Evaluation period is January 1, 2014 through December 31, 2015.

^^ Evaluation period is January 1, 2012 through December 31, 2013.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Indianapolis MSA^	1,236	66.63	5.68	3.80	20.03	20.63	35.60	30.83	38.68	44.74	2.69	4.92	3.00	2.61	2.54	
Limited Review:																
Anderson MSA^^	83	4.47	1.04	0.00	17.60	31.33	53.57	42.17	27.80	26.51	2.05	0.00	6.19	1.64	1.48	
Fort Wayne MSA^^	38	2.05	5.52	0.00	21.92	10.53	37.27	50.00	35.29	39.47	0.18	0.00	0.27	0.17	0.17	
Lafayette MSA	498	26.85	0.88	1.20	23.59	24.90	51.10	51.41	24.43	22.49	3.24	0.00	3.55	3.04	3.63	

* Based on 2014 Peer Mortgage Data -- US and PR for the Indianapolis MSA and Lafayette MSA, and 2013 Peer Mortgage Data for the Anderson MSA and Fort Wayne MSA.

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^ Evaluation period is January 1, 2014 through December 31, 2015.

^^ Evaluation period is January 1, 2012 through December 31, 2013.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: INDIANA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****						
Full Review:																
Indianapolis MSA^	3	75.00	12.63	33.33	42.38	33.33	28.51	33.33	16.48	0.00	2.02	0.00	2.86	2.86	0.00	
Limited Review:																
Anderson MSA^^	0	0.00	2.16	0.00	24.51	0.00	64.82	0.00	8.50	0.00	0.00	0.00	0.00	0.00	0.00	
Fort Wayne MSA^^	1	25.00	10.63	0.00	54.92	100.00	23.10	0.00	11.34	0.00	0.00	0.00	0.00	0.00	0.00	
Lafayette MSA	0	0.00	18.39	0.00	41.01	0.00	23.66	0.00	16.93	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR for the Indianapolis MSA and Lafayette MSA, and 2013 Peer Mortgage Data for the Anderson MSA and Fort Wayne MSA.

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

^ Evaluation period is January 1, 2014 through December 31, 2015.

^^ Evaluation period is January 1, 2012 through December 31, 2013.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: INDIANA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
Indianapolis MSA^	1,760	83.33	5.55	4.66	20.31	15.97	35.88	39.15	38.24	40.23	3.76	3.36	3.54	4.55	3.36	
Limited Review:																
Anderson MSA^^	40	1.89	1.66	0.00	25.58	25.00	47.65	45.00	25.02	30.00	1.65	0.00	2.64	1.08	2.08	
Fort Wayne MSA^^	103	4.88	10.13	12.62	25.41	23.30	32.85	43.69	31.26	20.39	1.00	0.96	0.83	1.47	0.69	
Lafayette MSA	209	9.90	6.02	2.39	40.05	38.76	34.27	33.97	19.07	24.88	3.27	0.93	3.98	2.68	4.15	

* Based on 2014 Peer Small Business Data -- US and PR for the Indianapolis MSA and Lafayette MSA, and 2013 Peer Small Business Data for the Anderson MSA and Fort Wayne MSA.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

^ Evaluation period is January 1, 2014 through December 31, 2015.

^^ Evaluation period is January 1, 2012 through December 31, 2013.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: INDIANA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography [†]				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans						
Full Review:																
Indianapolis MSA [^]	18	78.26	2.58	0.00	11.10	5.56	49.72	33.33	36.57	61.11	4.44	0.00	7.14	3.18	6.85	
Limited Review:																
Anderson MSA ^{^^}	0	0.00	0.53	0.00	5.30	0.00	55.48	0.00	38.69	0.00	0.00	0.00	0.00	0.00	0.00	
Fort Wayne MSA ^{^^}	1	4.35	2.15	0.00	11.44	0.00	44.33	100.00	42.08	0.00	0.64	0.00	0.00	0.94	0.00	
Lafayette MSA	4	17.39	0.75	0.00	10.53	0.00	74.81	100.00	13.91	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Small Business Data -- US and PR for the Indianapolis MSA and Lafayette MSA, and 2013 Peer Small Business Data for the Anderson MSA and Fort Wayne MSA.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

[^] Evaluation period is January 1, 2014 through December 31, 2015.

^{^^} Evaluation period is January 1, 2012 through December 31, 2013.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: INDIANA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						Market Share [†]				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Indianapolis MSA [^]	1,960	87.93	21.45	15.30	17.14	29.25	20.22	20.28	41.19	35.17	3.08	3.50	3.25	2.82	3.02	
Limited Review:																
Anderson MSA ^{^^}	17	0.76	18.44	11.76	19.00	11.76	22.60	23.53	39.96	52.94	0.70	0.63	0.00	0.62	1.51	
Fort Wayne MSA ^{^^}	14	0.63	19.54	7.14	18.49	14.29	22.62	21.43	39.35	57.14	0.12	0.00	0.12	0.07	0.23	
Lafayette MSA	238	10.68	21.86	11.49	17.19	23.83	21.12	25.53	39.82	39.15	1.78	2.86	1.52	1.65	1.77	

* Based on 2014 Peer Mortgage Data -- US and PR for the Indianapolis MSA and Lafayette MSA, and 2013 Peer Mortgage Data for the Anderson MSA and Fort Wayne MSA.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

[^] Evaluation period is January 1, 2014 through December 31, 2015.

^{^^} Evaluation period is January 1, 2012 through December 31, 2013.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: INDIANA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						Market Share [†]				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Indianapolis MSA [^]	170	80.19	21.45	10.06	17.14	24.26	20.22	26.04	41.19	39.64	3.38	4.49	3.76	3.44	2.98	
Limited Review:																
Anderson MSA ^{^^}	4	1.89	18.44	25.00	19.00	0.00	22.60	50.00	39.96	25.00	0.50	0.00	0.00	0.00	1.20	
Fort Wayne MSA ^{^^}	1	0.47	19.54	0.00	18.49	0.00	22.62	0.00	39.35	100.00	0.22	0.00	0.00	0.00	0.56	
Lafayette MSA	37	17.45	21.86	13.51	17.19	35.14	21.12	16.22	39.82	35.14	1.83	0.00	4.76	1.79	1.12	

* Based on 2014 Peer Mortgage Data -- US and PR for the Indianapolis MSA and Lafayette MSA, and 2013 Peer Mortgage Data for the Anderson MSA and Fort Wayne MSA.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by bank.

[^] Evaluation period is January 1, 2014 through December 31, 2015.

^{^^} Evaluation period is January 1, 2012 through December 31, 2013.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Indianapolis MSA^	1,236	66.63	21.45	10.82	17.14	25.38	20.22	22.66	41.19	41.14	3.39	3.35	4.30	3.26	3.02	
Limited Review:																
Anderson MSA^^	83	4.47	18.44	8.64	19.00	20.99	22.60	28.40	39.96	41.98	2.55	2.04	1.91	3.91	2.13	
Fort Wayne MSA^^	38	2.05	19.54	8.11	18.49	21.62	22.62	21.62	39.35	48.65	0.22	0.28	0.34	0.12	0.21	
Lafayette MSA	498	26.85	21.86	10.73	17.19	20.45	21.12	29.96	39.82	39.07	4.19	6.25	3.38	3.73	4.36	

* Based on 2014 Peer Mortgage Data -- US and PR for the Indianapolis MSA and Lafayette MSA, and 2013 Peer Mortgage Data for the Anderson MSA and Fort Wayne MSA.

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchased by bank.

^ Evaluation period is January 1, 2014 through December 31, 2015.

^^ Evaluation period is January 1, 2012 through December 31, 2013.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: INDIANA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Indianapolis MSA [^]	1,760	83.33	76.56	66.42	78.13	12.05	9.83	3.76	6.79
Limited Review:									
Anderson MSA ^{^^}	40	1.89	72.37	85.00	87.50	7.50	5.00	1.65	2.53
Fort Wayne MSA ^{^^}	103	4.88	70.48	66.99	94.17	2.91	2.91	1.00	1.35
Lafayette MSA	209	9.90	75.38	70.81	81.34	9.57	9.09	3.27	5.91

* Based on 2014 Peer Small Business Data -- US and PR for the Indianapolis MSA and Lafayette MSA, and 2013 Peer Small Business Data for the Anderson MSA and Fort Wayne MSA.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2.96% of small loans to businesses originated and purchased by the bank.

[^] Evaluation period is January 1, 2014 through December 31, 2015.

^{^^} Evaluation period is January 1, 2012 through December 31, 2013.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: INDIANA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [†]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Indianapolis MSA [^]	18	78.26	96.97	50.00	66.67	16.67	16.67	4.44	1.64
Limited Review:									
Anderson MSA ^{^^}	0	0.00	99.29	0.00	0.00	0.00	0.00	0.00	0.00
Fort Wayne MSA ^{^^}	1	4.35	97.96	0.00	100.00	0.00	0.00	0.64	0.00
Lafayette MSA	4	17.39	98.12	25.00	75.00	25.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR for the Indianapolis MSA and Lafayette MSA, and 2013 Peer Small Business Data for the Anderson MSA and Fort Wayne MSA.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

[^] Evaluation period is January 1, 2014 through December 31, 2015.

^{^^} Evaluation period is January 1, 2012 through December 31, 2013.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: INDIANA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Indianapolis MSA	14	5,119	73	18,762	87	23,881	99.86	0	0
Limited Review:									
Anderson MSA^^	0	0	2	4	2	4	0.02	0	0
Fort Wayne MSA^^	0	0	2	11	2	11	0.05	0	0
Lafayette MSA	1	5	7	14	8	19	0.08	0	0

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

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

^^ Evaluation period is January 1, 2012 through December 31, 2013.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: INDIANA Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Indianapolis MSA	94.71	45	91.84	4.44	24.45	33.33	37.78	3	5	-2	-1	+1	0	9.92	26.23	29.96	33.90
Limited Review:																	
Anderson MSA	1.11	0	0.00	0.00	0.00	0.00	0.00	0	1	0	-1	0	0	0.00	0.00	0.00	0.00
Fort Wayne MSA	0.28	0	0.00	0.00	0.00	0.00	0.00	0	1	0	0	0	-1	0.00	0.00	0.00	0.00
Lafayette MSA	3.89	4	8.16	0.00	50.00	25.00	25.00	1	1	0	-1	+1	0	7.42	26.27	41.93	18.51

Table 1. Lending Volume

LENDING VOLUME		Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:												
Detroit MD	9.92	1,504	275,553	1,475	225,859	5	796	20	117,684	3,004	619,892	5.05
MI non-MSA^	10.20	2,215	290,865	792	84,630	36	2,295	47	74,919	3,090	452,709	11.62
Warren MD	39.78	7,611	1,545,842	4,369	672,787	27	2,444	40	173,258	12,047	2,394,331	49.36
Limited Review:												
Ann Arbor MSA^^	3.26	766	197,367	216	24,340	4	245	2	11,424	988	233,376	0.54
Battle Creek MSA^^	0.39	78	7,829	38	4,304	0	0	3	1,866	119	13,999	0.05
Bay City MSA^^	0.10	16	930	13	496	0	0	1	2,018	30	3444	0.31
Flint MSA^^	1.25	244	36,834	128	19,749	3	410	3	18,900	378	75,893	1.68
Grand Rapids MSA^	13.83	2,532	386,766	1,609	205,903	29	2,706	19	62,981	4,189	658,356	23.57
Holland MSA^^^	6.37	1,389	200,374	518	90,489	22	1,683	0	0	1,929	292,546	19.15
Jackson MSA^^	0.74	192	21,603	28	1,480	0	0	4	8,414	224	31,497	0.13
Kalamazoo MSA	2.82	595	94,633	249	45,143	3	56	8	32,586	855	172,418	1.00
Lansing MSA^^	1.92	386	52,816	181	19,687	4	213	11	37,924	582	110,640	0.39
Midland MSA^^	0.07	14	1,702	7	1,099	0	0	0	0	21	2,801	0.22
Monroe MSA	2.86	702	92,246	158	16,083	4	123	2	10,080	866	118,532	2.57
Muskegon MSA	4.90	1,142	117,527	333	37,438	4	623	4	17,555	1,483	173,143	1.77
Niles MSA	0.58	122	14,979	51	9,169	1	15	2	10,672	176	34,835	0.30
Saginaw MSA^^	0.23	35	4,069	31	3,637	0	0	3	18,464	69	26,170	1.10
South Bend MSA	0.76	189	17,254	36	4,777	2	31	3	4,308	230	26,370	0.34
MI Statewide with P/M/F	0	0	0	0	0	0	0	1	5,000	1	5,000	0
MI Statewide with no P/M/F to serve AA(s)	0	0	0	0	0	0	0	38	39,769	38	39,769	0

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2015.

*** Deposit Data as of June 30, 2015 for all AAs except the Holland MSA, which is June 30, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

^ Evaluation period is January 1, 2014 to December 31, 2015.

^^ Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^^^ Evaluation period is January 1, 2012 to December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE												Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [†]										
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Detroit MD	850	9.87	7.41	4.24	21.84	7.29	28.51	22.94	42.25	65.53	1.47	2.32	0.36	1.26	1.62						
MI non-MSA [^]	965	11.20	0.09	0.00	7.46	8.08	66.60	55.96	25.84	35.96	3.28	0.00	2.78	2.78	4.42						
Warren MD	3,203	37.18	2.59	1.34	18.58	17.55	48.48	41.49	30.35	39.62	2.02	1.94	1.69	1.74	2.54						
Limited Review:																					
Ann Arbor MSA ^{^^}	526	6.11	3.99	1.71	14.89	17.87	51.87	45.06	29.26	35.36	2.84	1.61	4.31	2.52	2.84						
Battle Creek MSA ^{^^}	32	0.37	4.91	0.00	22.42	31.25	38.92	28.13	33.75	40.63	0.42	0.00	0.82	0.20	0.44						
Bay City MSA ^{^^}	6	0.07	0.82	0.00	9.94	16.67	71.82	83.33	17.42	0.00	0.17	0.00	0.00	0.24	0.00						
Flint MSA ^{^^}	126	1.46	6.65	0.00	19.66	6.35	39.72	37.30	33.97	56.35	0.80	0.00	0.30	0.65	1.00						
Grand Rapids MSA [^]	1,301	15.10	2.19	2.08	16.67	20.98	52.68	48.73	28.46	28.21	2.88	1.66	2.88	2.81	3.06						
Holland MSA ^{^^^}	327	3.80	0.00	0.00	10.89	14.07	73.24	67.28	15.87	18.65	3.56	0.00	6.13	3.16	3.83						
Jackson MSA ^{^^}	111	1.29	6.37	2.70	10.04	12.61	54.72	61.26	28.87	23.42	2.05	0.00	0.00	2.54	1.86						
Kalamazoo MSA	239	2.77	3.62	2.09	13.53	12.97	56.20	39.33	26.66	45.61	0.72	1.79	0.44	0.74	0.73						
Lansing MSA ^{^^}	170	1.97	3.56	2.94	15.04	21.76	52.89	36.47	28.50	38.82	0.97	0.87	1.40	0.71	1.23						
Midland MSA ^{^^}	7	0.08	2.00	0.00	12.52	14.29	46.25	57.14	39.24	28.57	0.08	0.00	0.00	0.20	0.00						
Monroe MSA	240	2.79	0.62	0.00	8.57	7.50	73.90	63.33	16.91	29.17	2.80	0.00	3.92	2.53	3.43						
Muskegon MSA	370	4.29	1.62	0.54	17.07	14.86	51.26	44.32	30.05	40.27	3.92	7.69	5.08	3.22	4.47						
Niles MSA	55	0.64	4.11	0.00	11.74	23.64	47.96	45.45	36.19	30.91	0.68	0.00	1.56	0.74	0.45						
Saginaw MSA ^{^^}	17	0.20	5.59	0.00	15.55	11.76	43.70	58.82	35.16	29.41	0.22	0.00	0.00	0.40	0.11						
South Bend MSA	70	0.81	0.00	0.00	23.52	32.86	69.72	67.14	6.76	0.00	2.64	0.00	3.93	2.37	0.00						

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Holland MSA, which is 2013 Peer Mortgage Data.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^] Evaluation period is January 1, 2014 to December 31, 2015.

^{^^} Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^{^^^} Evaluation period is January 1, 2012 to December 31, 2013.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Detroit MD	68	6.97	7.41	2.94	21.84	5.88	28.51	26.47	42.25	64.71	1.01	1.37	0.38	0.83	1.27	
MI non-MSA^	191	19.59	0.09	0.00	7.46	5.76	66.60	61.78	25.84	32.46	4.76	0.00	2.50	4.19	6.82	
Warren MD	349	35.79	2.59	1.72	18.58	14.61	48.48	43.55	30.35	40.11	3.15	4.55	2.57	3.05	3.50	
Limited Review:																
Ann Arbor MSA^^	32	3.28	3.99	0.00	14.89	15.63	51.87	56.25	29.26	28.13	2.04	0.00	6.25	2.13	0.87	
Battle Creek MSA^^	3	0.31	4.91	0.00	22.42	0.00	38.92	33.33	33.75	66.67	0.36	0.00	0.00	0.97	0.00	
Bay City MSA^^	4	0.41	0.82	0.00	9.94	50.00	71.82	50.00	17.42	0.00	0.35	0.00	0.00	0.46	0.00	
Flint MSA^^	15	1.54	6.65	6.67	19.66	6.67	39.72	80.00	33.97	6.67	0.41	0.00	0.00	0.94	0.00	
Grand Rapids MSA^	129	13.23	2.19	1.55	16.67	19.38	52.68	53.49	28.46	25.58	2.52	0.00	1.19	3.41	1.93	
Holland MSA^^^	33	3.38	0.00	0.00	10.89	15.15	73.24	78.79	15.87	6.06	7.38	0.00	10.53	8.05	2.99	
Jackson MSA^^	7	0.72	6.37	28.57	10.04	0.00	54.72	57.14	28.87	14.29	0.81	4.17	0.00	0.51	0.90	
Kalamazoo MSA	19	1.95	3.62	5.26	13.53	5.26	56.20	52.63	26.66	36.84	0.87	0.00	0.00	1.30	0.67	
Lansing MSA^^	25	2.56	3.56	0.00	15.04	12.00	52.89	56.00	28.50	32.00	0.45	0.00	0.88	0.49	0.21	
Midland MSA^^	2	0.21	2.00	0.00	12.52	0.00	46.25	50.00	39.24	50.00	0.00	0.00	0.00	0.00	0.00	
Monroe MSA	34	3.49	0.62	0.00	8.57	2.94	73.90	64.71	16.91	32.35	2.96	0.00	0.00	1.34	11.43	
Muskegon MSA	39	4.00	1.62	0.00	17.07	15.38	51.26	61.54	30.05	23.08	3.87	0.00	0.00	2.97	6.67	
Niles MSA	7	0.72	4.11	0.00	11.74	42.86	47.96	28.57	36.19	28.57	0.00	0.00	0.00	0.00	0.00	
Saginaw MSA^^	2	0.21	5.59	0.00	15.55	0.00	43.70	100.00	35.16	0.00	0.21	0.00	0.00	0.44	0.00	
South Bend MSA	16	1.64	0.00	0.00	23.52	37.50	69.72	62.50	6.76	0.00	4.00	0.00	7.69	3.70	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Holland MSA, which is 2013 Peer Mortgage Data.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^ Evaluation period is January 1, 2014 to December 31, 2015.

^^ Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^^^ Evaluation period is January 1, 2012 to December 31, 2013.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Detroit MD	583	5.76	7.41	1.54	21.84	6.69	28.51	14.41	42.25	77.36	0.85	1.05	1.53	0.91	0.76	
MI non-MSA^	1,059	10.45	0.09	0.00	7.46	6.04	66.60	59.02	25.84	34.94	5.82	0.00	5.28	5.81	5.92	
Warren MD	4,054	40.02	2.59	0.84	18.58	11.84	48.48	45.04	30.35	42.28	1.51	2.52	1.55	1.46	1.54	
Limited Review:																
Ann Arbor MSA^^	207	2.04	3.99	1.93	14.89	16.43	51.87	45.41	29.26	36.23	1.02	0.00	0.85	0.94	1.29	
Battle Creek MSA^^	43	0.42	4.91	0.00	22.42	25.58	38.92	37.21	33.75	37.21	0.52	0.00	0.56	1.06	0.00	
Bay City MSA^^	6	0.06	0.82	0.00	9.94	33.33	71.82	50.00	17.42	16.67	0.10	0.00	0.00	0.14	0.00	
Flint MSA^^	101	1.00	6.65	1.98	19.66	10.89	39.72	43.56	33.97	43.56	0.76	3.70	0.73	0.72	0.75	
Grand Rapids MSA^	1,102	10.88	2.19	1.63	16.67	14.61	52.68	46.46	28.46	37.30	4.57	2.84	3.77	4.29	5.36	
Holland MSA^^^	1,029	10.16	0.00	0.00	10.89	8.36	73.24	70.55	15.87	21.09	6.30	0.00	5.40	6.41	6.33	
Jackson MSA^^	74	0.73	6.37	4.05	10.04	6.76	54.72	58.11	28.87	31.08	1.22	3.85	3.42	0.64	1.36	
Kalamazoo MSA	336	3.32	3.62	2.08	13.53	12.50	56.20	52.68	26.66	32.74	1.41	1.92	1.64	1.56	1.04	
Lansing MSA^^	191	1.89	3.56	2.62	15.04	13.09	52.89	51.83	28.50	32.46	1.18	0.83	0.44	1.20	1.44	
Midland MSA^^	5	0.05	2.00	0.00	12.52	20.00	46.25	20.00	39.24	60.00	0.27	0.00	0.00	0.31	0.32	
Monroe MSA	428	4.23	0.62	0.00	8.57	3.27	73.90	62.62	16.91	34.11	3.64	0.00	1.59	3.36	5.52	
Muskegon MSA	733	7.24	1.62	0.55	17.07	13.37	51.26	51.43	30.05	34.65	6.76	0.00	7.64	7.84	5.15	
Niles MSA	60	0.59	4.11	0.00	11.74	16.67	47.96	68.33	36.19	15.00	0.49	0.00	2.11	0.55	0.00	
Saginaw MSA^^	16	0.16	5.59	0.00	15.55	6.25	43.70	56.25	35.16	37.50	0.33	0.00	0.00	0.44	0.30	
South Bend MSA	103	1.02	0.00	0.00	23.52	35.92	69.72	59.22	6.76	4.85	2.12	0.00	2.40	2.25	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Holland MSA, which is 2013 Peer Mortgage Data.

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^ Evaluation period is January 1, 2014 to December 31, 2015.

^^ Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^^^ Evaluation period is January 1, 2012 to December 31, 2013.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Detroit MD	3	25.00	23.13	33.33	25.99	0.00	26.86	33.33	24.03	33.33	0.00	0.00	0.00	0.00	0.00	
MI non-MSA^	0	0.00	0.34	0.00	16.19	0.00	63.52	0.00	19.95	0.00	0.00	0.00	0.00	0.00	0.00	
Warren MD	5	41.67	12.29	0.00	29.25	20.00	44.99	60.00	13.47	20.00	0.96	0.00	0.00	1.85	0.00	
Limited Review:																
Ann Arbor MSA^^	1	8.33	20.11	0.00	30.30	0.00	36.45	100.00	13.14	0.00	2.78	0.00	0.00	7.69	0.00	
Battle Creek MSA^^	0	0.00	9.69	0.00	30.47	0.00	42.94	0.00	16.90	0.00	0.00	0.00	0.00	0.00	0.00	
Bay City MSA^^	0	0.00	3.55	0.00	25.87	0.00	59.87	0.00	10.71	0.00	0.00	0.00	0.00	0.00	0.00	
Flint MSA^^	2	16.67	9.26	0.00	26.90	100.00	41.72	0.00	22.12	0.00	0.00	0.00	0.00	0.00	0.00	
Grand Rapids MSA^	0	0.00	5.33	0.00	32.16	0.00	52.81	0.00	9.70	0.00	0.00	0.00	0.00	0.00	0.00	
Holland MSA^^^	0	0.00	0.00	0.00	33.14	0.00	64.65	0.00	2.21	0.00	0.00	0.00	0.00	0.00	0.00	
Jackson MSA^^	0	0.00	25.53	0.00	27.06	0.00	37.37	0.00	10.03	0.00	0.00	0.00	0.00	0.00	0.00	
Kalamazoo MSA	1	8.33	8.93	0.00	25.81	0.00	51.98	0.00	13.28	100.00	0.00	0.00	0.00	0.00	0.00	
Lansing MSA^^	0	0.00	7.92	0.00	29.73	0.00	42.79	0.00	19.56	0.00	0.00	0.00	0.00	0.00	0.00	
Midland MSA^^	0	0.00	5.76	0.00	28.86	0.00	24.80	0.00	40.59	0.00	0.00	0.00	0.00	0.00	0.00	
Monroe MSA	0	0.00	0.56	0.00	32.49	0.00	59.42	0.00	7.53	0.00	0.00	0.00	0.00	0.00	0.00	
Muskegon MSA	0	0.00	5.76	0.00	55.93	0.00	27.26	0.00	11.05	0.00	0.00	0.00	0.00	0.00	0.00	
Niles MSA	0	0.00	18.72	0.00	22.27	0.00	29.41	0.00	29.60	0.00	0.00	0.00	0.00	0.00	0.00	
Saginaw MSA^^	0	0.00	12.58	0.00	22.19	0.00	24.87	0.00	40.36	0.00	0.00	0.00	0.00	0.00	0.00	
South Bend MSA	0	0.00	0.00	0.00	38.28	0.00	60.62	0.00	1.10	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Holland MSA, which is 2013 Peer Mortgage Data.

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

^ Evaluation period is January 1, 2014 to December 31, 2015.

^^ Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^^^ Evaluation period is January 1, 2012 to December 31, 2013.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES													Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [†]										
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Detroit MD	1,470	14.46	10.51	8.71	18.99	21.22	26.99	25.65	42.94	44.42	1.88	2.23	2.54	1.91	1.62						
MI non-MSA [^]	792	7.79	0.57	0.13	9.03	10.86	64.17	64.14	26.16	24.87	2.89	0.00	3.80	3.09	2.62						
Warren MD	4,310	42.39	4.58	7.29	19.13	24.04	42.05	40.21	33.84	28.47	2.24	4.53	3.00	2.32	1.58						
Limited Review:																					
Ann Arbor MSA ^{^^}	216	2.12	4.81	1.85	12.50	19.44	49.75	56.02	31.46	22.69	0.77	0.87	1.66	0.81	0.45						
Battle Creek MSA ^{^^}	38	0.37	8.61	13.16	22.83	15.79	38.05	18.42	30.51	52.63	1.04	0.75	0.28	0.95	1.92						
Bay City MSA ^{^^}	13	0.13	1.39	7.69	16.49	0.00	67.44	76.92	14.68	15.38	0.63	0.00	0.00	1.02	0.00						
Flint MSA ^{^^}	128	1.26	8.86	12.50	16.31	12.50	43.61	60.16	30.90	14.84	0.80	2.69	0.88	0.63	0.70						
Grand Rapids MSA [^]	1,609	15.83	4.27	4.41	19.23	15.04	47.77	52.33	28.73	28.22	5.47	6.56	5.16	6.29	4.57						
Holland MSA ^{^^^}	518	5.09	0.00	0.00	15.94	14.29	70.75	76.64	13.31	9.07	5.82	0.00	5.47	6.22	4.45						
Jackson MSA ^{^^}	28	0.28	15.31	25.00	14.65	25.00	45.13	28.57	24.73	21.43	0.95	1.42	1.85	0.61	0.68						
Kalamazoo MSA	249	2.45	5.76	7.63	18.00	16.87	53.23	53.41	23.01	22.09	1.24	1.70	1.31	1.17	1.31						
Lansing MSA ^{^^}	180	1.77	3.79	4.44	23.49	22.78	42.66	46.11	27.99	26.67	1.08	0.81	0.98	1.49	0.75						
Midland MSA ^{^^}	7	0.07	6.03	0.00	19.72	0.00	36.62	0.00	37.63	100.00	0.28	0.00	0.00	0.00	0.69						
Monroe MSA	158	1.55	0.77	0.00	12.00	5.06	71.00	68.35	16.22	26.58	2.78	0.00	2.70	2.09	5.75						
Muskegon MSA	333	3.28	5.10	9.01	21.59	27.33	44.42	36.34	28.89	27.33	4.52	4.70	5.74	3.97	4.62						
Niles MSA	51	0.50	9.84	3.92	10.76	35.29	42.32	17.65	37.08	43.14	0.45	0.45	0.59	0.23	0.65						
Saginaw MSA ^{^^}	31	0.30	5.91	3.23	14.91	6.45	42.41	38.71	36.78	51.61	0.51	0.00	0.39	0.52	0.60						
South Bend MSA	36	0.35	0.00	0.00	24.36	13.89	70.66	83.33	4.98	2.78	2.21	0.00	1.14	2.50	2.86						

* Based on 2014 Peer Small Business Data -- US and PR for all AAs except for the Holland MSA, which is 2013 Peer Small Business Data.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

[^] Evaluation period is January 1, 2014 to December 31, 2015.

^{^^} Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^{^^^} Evaluation period is January 1, 2012 to December 31, 2013.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: MICHIGAN		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [†]										
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Detroit MD	5	3.47	5.75	0.00	16.14	60.00	26.28	20.00	51.65	20.00	11.11	0.00	50.00	0.00	0.00						
MI non-MSA [^]	36	25.00	0.04	0.00	3.77	2.78	68.69	72.22	27.50	25.00	2.49	0.00	5.00	2.65	1.86						
Warren MD	27	18.75	2.62	3.70	18.57	7.41	53.54	77.78	25.06	11.11	5.11	33.33	0.00	5.81	5.00						
Limited Review:																					
Ann Arbor MSA ^{^^}	4	2.78	1.24	0.00	5.43	0.00	69.34	25.00	23.98	75.00	3.64	0.00	0.00	0.00	14.29						
Battle Creek MSA ^{^^}	0	0.00	1.19	0.00	11.51	0.00	56.35	0.00	30.95	0.00	0.00	0.00	0.00	0.00	0.00						
Bay City MSA ^{^^}	0	0.00	0.70	0.00	3.02	0.00	72.16	0.00	24.13	0.00	0.00	0.00	0.00	0.00	0.00						
Flint MSA ^{^^}	3	2.08	2.45	0.00	10.66	66.67	45.71	33.33	41.18	0.00	2.86	0.00	0.00	5.26	0.00						
Grand Rapids MSA [^]	29	20.14	0.71	6.90	12.24	3.45	57.52	68.97	29.52	20.69	5.77	0.00	2.27	6.03	7.46						
Holland MSA ^{^^^}	22	15.28	0.00	0.00	5.34	9.09	79.90	81.82	14.76	9.09	8.82	0.00	40.00	9.42	0.00						
Jackson MSA ^{^^}	0	0.00	1.78	0.00	3.56	0.00	60.99	0.00	33.66	0.00	0.00	0.00	0.00	0.00	0.00						
Kalamazoo MSA	3	2.08	0.87	0.00	17.33	0.00	62.63	100.00	19.17	0.00	1.12	0.00	0.00	1.92	0.00						
Lansing MSA ^{^^}	4	2.78	1.55	0.00	5.65	0.00	67.16	25.00	25.08	75.00	0.81	0.00	0.00	1.18	0.00						
Midland MSA ^{^^}	0	0.00	0.44	0.00	19.11	0.00	56.89	0.00	23.56	0.00	0.00	0.00	0.00	0.00	0.00						
Monroe MSA	4	2.78	0.00	0.00	2.62	0.00	88.52	75.00	8.85	25.00	1.00	0.00	0.00	1.04	0.00						
Muskegon MSA	4	2.78	0.90	0.00	10.51	0.00	69.07	75.00	19.52	25.00	8.00	0.00	0.00	8.00	0.00						
Niles MSA	1	0.69	1.76	0.00	3.68	0.00	63.09	100.00	31.47	0.00	1.79	0.00	0.00	2.56	0.00						
Saginaw MSA ^{^^}	0	0.00	0.85	0.00	3.70	0.00	60.74	0.00	34.71	0.00	0.00	0.00	0.00	0.00	0.00						
South Bend MSA	2	1.39	0.00	0.00	17.97	0.00	78.26	100.00	3.77	0.00	0.00	0.00	0.00	0.00	0.00						

* Based on 2014 Peer Small Business Data -- US and PR for all AAs except for the Holland MSA, which is 2013 Peer Small Business Data.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

[^] Evaluation period is January 1, 2014 to December 31, 2015.

^{^^} Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^{^^^} Evaluation period is January 1, 2012 to December 31, 2013.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share [†]				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Detroit MD	850	9.87	24.56	4.55	15.84	13.28	17.67	25.00	41.92	57.18	1.70	0.73	0.90	1.43	2.27	
MI non-MSA [^]	965	11.20	17.66	10.34	17.58	25.59	22.42	22.92	42.35	41.15	3.90	4.01	4.16	3.68	3.86	
Warren MD	3,203	37.18	20.29	11.82	18.26	23.13	21.47	23.03	39.99	42.02	2.30	1.58	1.93	2.05	2.98	
Limited Review:																
Ann Arbor MSA ^{^^}	526	6.11	21.69	7.63	16.89	37.02	21.43	17.37	39.99	37.98	3.26	3.23	4.93	2.55	2.75	
Battle Creek MSA ^{^^}	32	0.37	20.99	16.13	18.07	29.03	20.52	25.81	40.42	29.03	0.48	0.00	0.00	1.14	0.40	
Bay City MSA ^{^^}	6	0.07	18.22	33.33	18.66	16.67	23.52	50.00	39.60	0.00	0.21	0.00	0.33	0.40	0.00	
Flint MSA ^{^^}	126	1.46	22.11	10.57	17.17	24.39	19.80	37.40	40.92	27.64	1.03	1.02	0.68	1.51	0.91	
Grand Rapids MSA [^]	1,301	15.10	19.81	15.24	18.26	30.01	22.31	21.95	39.62	32.80	3.34	4.08	3.57	2.93	3.18	
Holland MSA ^{^^^}	327	3.80	16.37	12.97	20.11	29.75	24.86	25.95	38.66	31.33	4.08	4.15	4.33	4.06	3.85	
Jackson MSA ^{^^}	111	1.29	20.69	10.19	18.28	28.70	21.31	29.63	39.72	31.48	2.43	2.61	2.63	1.56	2.88	
Kalamazoo MSA	239	2.77	22.68	11.21	16.42	17.67	20.50	21.12	40.40	50.00	0.81	1.53	0.53	0.93	0.79	
Lansing MSA ^{^^}	170	1.97	20.56	12.57	17.77	18.56	21.91	14.97	39.77	53.89	1.12	0.52	0.59	0.79	1.97	
Midland MSA ^{^^}	7	0.08	20.69	16.67	17.69	50.00	19.95	16.67	41.67	16.67	0.09	0.00	0.00	0.00	0.22	
Monroe MSA	240	2.79	18.60	9.58	19.27	23.33	22.93	30.83	39.20	36.25	3.20	5.64	3.25	3.28	2.31	
Muskegon MSA	370	4.29	21.13	9.94	17.87	25.69	21.24	27.62	39.75	36.74	5.11	7.39	5.09	4.42	5.07	
Niles MSA	55	0.64	21.66	12.73	18.24	20.00	19.92	29.09	40.18	38.18	0.81	1.74	0.63	0.81	0.76	
Saginaw MSA ^{^^}	17	0.20	21.86	11.76	16.90	29.41	20.65	17.65	40.60	41.18	0.27	0.69	0.30	0.23	0.18	
South Bend MSA	70	0.81	21.19	15.94	20.19	42.03	20.49	23.19	38.13	18.84	3.16	4.76	9.17	2.56	0.42	

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Holland MSA, which is 2013 Peer Mortgage Data.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

[^] Evaluation period is January 1, 2014 to December 31, 2015.

^{^^} Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^{^^^} Evaluation period is January 1, 2012 to December 31, 2013.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT												Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*									
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Detroit MD	68	6.97	24.56	2.99	15.84	10.45	17.67	25.37	41.92	61.19	1.07	0.00	0.00	1.60	1.48					
MI non-MSA^	191	19.59	17.66	17.28	17.58	22.51	22.42	30.37	42.35	29.84	4.91	8.77	5.41	6.30	2.87					
Warren MD	349	35.79	20.29	11.53	18.26	20.75	21.47	25.36	39.99	42.36	3.37	1.79	4.27	2.91	3.69					
Limited Review:																				
Ann Arbor MSA^^	32	3.28	21.69	18.75	16.89	18.75	21.43	31.25	39.99	31.25	2.17	3.70	2.94	2.30	1.42					
Battle Creek MSA^^	3	0.31	20.99	0.00	18.07	33.33	20.52	0.00	40.42	66.67	0.37	0.00	2.13	0.00	0.00					
Bay City MSA^^	4	0.41	18.22	0.00	18.66	75.00	23.52	0.00	39.60	25.00	0.36	0.00	1.30	0.00	0.00					
Flint MSA^^	15	1.54	22.11	6.67	17.17	20.00	19.80	26.67	40.92	46.67	0.42	0.00	0.00	0.00	0.99					
Grand Rapids MSA^	129	13.23	19.81	14.29	18.26	19.84	22.31	33.33	39.62	32.54	2.56	4.65	2.56	2.00	2.32					
Holland MSA^^^	33	3.38	16.37	12.12	20.11	15.15	24.86	45.45	38.66	27.27	7.67	13.33	4.11	10.08	6.15					
Jackson MSA^^	7	0.72	20.69	14.29	18.28	28.57	21.31	28.57	39.72	28.57	0.84	2.33	0.00	1.03	0.76					
Kalamazoo MSA	19	1.95	22.68	5.26	16.42	15.79	20.50	26.32	40.40	52.63	0.90	0.00	1.02	0.92	1.02					
Lansing MSA^^	25	2.56	20.56	12.00	17.77	16.00	21.91	20.00	39.77	52.00	0.47	1.12	0.27	0.00	0.74					
Midland MSA^^	2	0.21	20.69	0.00	17.69	0.00	19.95	0.00	41.67	100.00	0.00	0.00	0.00	0.00	0.00					
Monroe MSA	34	3.49	18.60	0.00	19.27	20.59	22.93	32.35	39.20	47.06	3.16	0.00	2.22	4.65	3.66					
Muskegon MSA	39	4.00	21.13	12.82	17.87	23.08	21.24	25.64	39.75	38.46	4.07	0.00	0.00	4.76	6.41					
Niles MSA	7	0.72	21.66	14.29	18.24	71.43	19.92	0.00	40.18	14.29	0.00	0.00	0.00	0.00	0.00					
Saginaw MSA^^	2	0.21	21.86	0.00	16.90	0.00	20.65	100.00	40.60	0.00	0.22	0.00	0.00	0.87	0.00					
South Bend MSA	16	1.64	21.19	18.75	20.19	43.75	20.49	18.75	38.13	18.75	4.17	0.00	37.50	0.00	0.00					

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Holland MSA, which is 2013 Peer Mortgage Data.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

^ Evaluation period is January 1, 2014 to December 31, 2015.

^^ Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^^^ Evaluation period is January 1, 2012 to December 31, 2013.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Detroit MD	583	5.76	24.56	3.93	15.84	8.39	17.67	18.04	41.92	69.64	1.00	0.20	0.44	1.20	1.11	
MI non-MSA^	1,059	10.45	17.66	10.18	17.58	19.12	22.42	25.74	42.35	44.96	6.92	9.01	7.48	7.15	6.21	
Warren MD	4,054	40.02	20.29	9.19	18.26	17.51	21.47	26.57	39.99	46.74	1.69	2.00	1.40	1.67	1.76	
Limited Review:																
Ann Arbor MSA^^	207	2.04	21.69	6.90	16.89	18.72	21.43	26.11	39.99	48.28	1.11	0.50	0.88	1.35	1.23	
Battle Creek MSA^^	43	0.42	20.99	6.98	18.07	30.23	20.52	13.95	40.42	48.84	0.62	1.22	1.08	0.88	0.21	
Bay City MSA^^	6	0.06	18.22	33.33	18.66	33.33	23.52	16.67	39.60	16.67	0.11	0.97	0.00	0.00	0.00	
Flint MSA^^	101	1.00	22.11	9.90	17.17	11.88	19.80	16.83	40.92	61.39	0.92	2.38	0.40	0.76	1.00	
Grand Rapids MSA^	1,102	10.88	19.81	8.54	18.26	24.02	22.31	26.17	39.62	41.28	5.47	4.73	6.07	5.12	5.55	
Holland MSA^^^	1,029	10.16	16.37	9.91	20.11	24.67	24.86	27.50	38.66	37.92	7.63	8.59	8.01	7.95	6.98	
Jackson MSA^^	74	0.73	20.69	9.46	18.28	17.57	21.31	21.62	39.72	51.35	1.48	4.44	2.65	1.04	0.74	
Kalamazoo MSA	336	3.32	22.68	8.41	16.42	17.12	20.50	26.13	40.40	48.35	1.68	3.35	1.84	1.79	1.31	
Lansing MSA^^	191	1.89	20.56	8.95	17.77	22.63	21.91	23.68	39.77	44.74	1.42	1.59	2.10	0.87	1.43	
Midland MSA^^	5	0.05	20.69	0.00	17.69	0.00	19.95	40.00	41.67	60.00	0.32	0.00	0.00	0.64	0.39	
Monroe MSA	428	4.23	18.60	6.19	19.27	21.67	22.93	26.67	39.20	45.48	4.25	7.41	4.59	3.75	3.87	
Muskegon MSA	733	7.24	21.13	8.54	17.87	21.90	21.24	23.69	39.75	45.87	8.57	6.86	11.43	7.57	8.17	
Niles MSA	60	0.59	21.66	1.75	18.24	22.81	19.92	35.09	40.18	40.35	0.52	0.00	1.12	1.18	0.16	
Saginaw MSA^^	16	0.16	21.86	6.25	16.90	37.50	20.65	18.75	40.60	37.50	0.39	0.00	0.42	0.55	0.36	
South Bend MSA	103	1.02	21.19	16.67	20.19	27.45	20.49	27.45	38.13	28.43	2.55	0.00	2.44	4.04	2.50	

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Holland MSA, which is 2013 Peer Mortgage Data.

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchased by bank.

^ Evaluation period is January 1, 2014 to December 31, 2015.

^^ Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^^^ Evaluation period is January 1, 2012 to December 31, 2013.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MICHIGAN			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Detroit MD	1,475	14.42	78.45	62.37	64.41	15.73	19.86	1.88	3.08
MI non-MSA^	792	7.74	79.59	68.56	76.26	12.12	11.62	2.89	4.86
Warren MD	4,369	42.70	79.61	61.52	66.35	15.01	18.63	2.24	3.43
Limited Review:									
Ann Arbor MSA^^	216	2.11	78.05	68.06	74.07	12.04	13.89	0.77	1.24
Battle Creek MSA^^	38	0.37	77.05	73.68	84.21	0.00	15.79	1.04	2.66
Bay City MSA^^	13	0.13	77.90	92.31	92.31	7.69	0.00	0.63	1.57
Flint MSA^^	128	1.25	79.53	58.59	67.19	13.28	19.53	0.80	1.10
Grand Rapids MSA^	1,609	15.73	76.13	63.02	71.47	13.42	15.10	5.47	9.22
Holland MSA^^^	518	5.06	76.30	60.42	61.58	14.86	23.55	5.82	7.49
Jackson MSA^^	28	0.27	77.48	89.29	92.86	3.57	3.57	0.95	2.33
Kalamazoo MSA	249	2.43	77.51	54.22	64.66	13.65	21.69	1.24	1.71
Lansing MSA^^	181	1.77	76.65	63.54	74.59	14.92	10.50	1.08	1.90
Midland MSA^^	7	0.07	77.91	57.14	71.43	0.00	28.57	0.28	0.64
Monroe MSA	158	1.54	80.31	74.05	77.85	9.49	12.66	2.78	4.21
Muskegon MSA	333	3.25	77.41	66.37	75.68	11.71	12.61	4.52	8.10
Niles MSA	51	0.50	78.64	56.86	62.75	9.80	27.45	0.45	0.42
Saginaw MSA^^	31	0.30	75.30	74.19	77.42	6.45	16.13	0.51	1.16
South Bend MSA	36	0.35	82.80	63.89	72.22	5.56	22.22	2.21	3.32

* Based on 2014 Peer Small Business Data -- US and PR for all AAs except for the Holland MSA, which is 2013 Peer Small Business Data.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2.94% of small loans to businesses originated and purchased by the bank.

^ Evaluation period is January 1, 2014 to December 31, 2015.

^^ Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^^^ Evaluation period is January 1, 2012 to December 31, 2013.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: MICHIGAN		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [†]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Detroit MD	5	3.47	96.58	80.00	60.00	20.00	20.00	11.11	33.33
MI non-MSA [^]	36	25.00	97.87	88.89	88.89	8.33	2.78	2.49	3.68
Warren MD	27	18.75	96.73	96.30	74.07	11.11	14.81	5.11	14.58
Limited Review:									
Ann Arbor MSA ^{^^}	4	2.78	96.83	100.00	100.00	0.00	0.00	3.64	10.00
Battle Creek MSA ^{^^}	0	0.00	97.42	0.00	0.00	0.00	0.00	0.00	0.00
Bay City MSA ^{^^}	0	0.00	98.38	0.00	0.00	0.00	0.00	0.00	0.00
Flint MSA ^{^^}	3	2.08	97.55	100.00	66.67	0.00	33.33	2.86	5.88
Grand Rapids MSA [^]	29	20.14	95.19	75.86	72.41	17.24	10.34	5.77	8.61
Holland MSA ^{^^^}	22	15.28	95.60	81.82	86.36	0.00	13.64	8.82	14.67
Jackson MSA ^{^^}	0	0.00	99.41	0.00	0.00	0.00	0.00	0.00	0.00
Kalamazoo MSA	3	2.08	94.68	100.00	100.00	0.00	0.00	1.12	3.23
Lansing MSA ^{^^}	4	2.78	97.77	50.00	75.00	25.00	0.00	0.81	2.63
Midland MSA ^{^^}	0	0.00	98.67	0.00	0.00	0.00	0.00	0.00	0.00
Monroe MSA	4	2.78	97.21	100.00	100.00	0.00	0.00	1.00	1.39
Muskegon MSA	4	2.78	97.60	75.00	50.00	0.00	50.00	8.00	10.00
Niles MSA	1	0.69	97.06	100.00	100.00	0.00	0.00	1.79	3.70
Saginaw MSA ^{^^}	0	0.00	98.15	0.00	0.00	0.00	0.00	0.00	0.00
South Bend MSA	2	1.39	98.26	100.00	100.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR for all AAs except for the Holland MSA, which is 2013 Peer Small Business Data.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 2.00% of small loans to farms originated and purchased by the bank.

[^] Evaluation period is January 1, 2014 to December 31, 2015.

^{^^} Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^{^^^} Evaluation period is January 1, 2012 to December 31, 2013.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MICHIGAN			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Detroit MD	9	10,017	32	21,343	41	31,360	26.93	1	181
MI non-MSA	14	2,937	34	7,240	48	10,177	8.74	0	0
Warren MD	10	8,100	27	29,649	37	37,749	32.14	0	0
Limited Review:									
Ann Arbor MSA^^	3	1,075	3	200	6	1,275	1.09	0	0
Battle Creek MSA^^	2	86	4	4	6	90	0.08	0	0
Bay City MSA^^	0	0	2	3	2	3	0.00	0	0
Flint MSA^^	3	108	6	8	9	116	0.10	0	0
Grand Rapids MSA	15	3,987	45	18,406	60	22,393	19.23	0	0
Holland MSA^^^	0	0	0	0	0	0	0.00	0	0
Jackson MSA^^	5	87	1	1	6	88	0.08	0	0
Kalamazoo MSA	6	1,729	6	921	12	2,650	2.28	0	0
Lansing MSA^^	6	54	8	1,851	14	1,905	1.64	0	0
Midland MSA^^	0	0	1	84	1	84	0.07	0	0
Monroe MSA	1	82	2	2,709	3	2,791	2.40	0	0
Muskegon MSA	2	393	1	7	3	400	0.34	0	0
Niles MSA	0	0	0	0	0	0	0.00	0	0
Saginaw MSA^^	2	31	3	9	5	40	0.03	0	0
South Bend MSA	3	53	4	91	7	144	0.12	0	0
<i>MI Statewide with P/M/F to serve an AA</i>	<i>0</i>	<i>0</i>	<i>1</i>	<i>5,200</i>	<i>1</i>	<i>5,200</i>	<i>4.46</i>	<i>0</i>	<i>0</i>

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

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

^^ Evaluation period start dates are as follows: Ann Arbor MSA-March 31, 2012; Battle Creek and Jackson MSAs-August 20, 2012; Bay City and Saginaw MSAs-March 3, 2014; Flint MSA-August 13, 2012; Lansing MSA-May 17, 2012; and Midland MSA-September 12, 2014. Evaluation end date for all AAs is December 31, 2015.

^^^ Evaluation period is January 1, 2012 to December 31, 2013.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MICHIGAN Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Detroit MD	5.05	23	10.00	4.35	8.70	43.47	43.48	12	2	+1	+1	+2	+6	12.53	27.09	25.88	34.50
MI non-MSA	11.62	43	18.70	0.00	4.65	67.44	27.91	12	6	0	0	+1	+5	0.19	9.01	65.35	24.40
Warren MD	49.36	65	28.26	7.69	16.92	52.31	23.08	19	8	+2	+1	+10	-2	4.31	20.12	46.54	28.99
Limited Review:																	
Ann Arbor MSA	0.54	5	2.17	0.00	0.00	80.00	20.00	4	1	0	0	+2	+1	8.05	17.84	46.48	24.26
Battle Creek MSA	0.05	2	.87	0.00	0.00	0.00	100.00	2	0	0	0	0	+2	6.37	25.80	39.54	28.29
Bay City MSA	0.31	2	.87	0.00	0.00	100.00	0.00	2	0	0	0	+2	0	1.21	13.32	69.45	16.03
Flint MSA	1.68	9	3.92	0.00	22.23	0.00	77.77	10	1	0	+2	+7	0	10.04	22.45	36.99	30.50
Grand Rapids MSA	23.57	45	19.57	0.00	17.78	57.78	24.44	19	4	0	+2	+7	+6	4.41	20.60	49.42	25.58
Holland MSA	0.00	0	0.00	0.00	0.00	0.00	0.00	1	0	0	0	+1	0	0.00	0.00	0.00	0.00
Jackson MSA	0.13	2	.87	0.00	50.00	50.00	0.00	2	0	0	+1	+1	0	9.91	11.04	50.42	24.40
Kalamazoo MSA	1.00	6	2.61	0.00	16.67	83.33	0.00	4	0	0	0	+4	0	8.13	16.94	51.82	23.11
Lansing MSA	0.39	9	3.92	0.00	22.22	66.67	11.11	9	0	0	+2	+6	+1	5.23	19.33	47.52	24.26
Midland MSA	0.22	1	.43	100.00	0.00	0.00	0.00	0	0	0	0	0	0	2.89	13.87	44.58	38.67
Monroe MSA	2.57	5	2.17	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.96	10.81	72.72	15.51
Muskegon MSA	1.77	5	2.17	0.00	40.00	0.00	60.00	1	1	0	0	-1	+1	5.12	23.90	45.63	25.35
Niles MSA	0.30	1	.43	0.00	100.00	0.00	0.00	0	0	0	0	0	0	8.58	13.81	45.16	32.45
Saginaw MSA	1.10	6	2.61	16.67	0.00	33.33	50.00	5	0	0	0	+2	+3	8.35	19.21	39.45	32.99
South Bend MSA	0.34	1	.43	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	25.77	68.10	6.13

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Cleveland MSA	23.27	9,366	1,458,345	7,210	784,491	52	2,807	53	212,357	16,681	2,458,000	15.51
Columbus MSA	36.93	18,724	3,454,155	7,437	881,839	226	24,434	80	313,405	26,467	4,673,833	55.97
Limited Review:												
Akron MSA	7.79	3,391	478,227	2,153	257,040	22	931	18	73,484	5,584	809,682	2.93
Canton MSA	8.52	4,401	555,966	1,662	174,003	32	1,661	11	19,981	6,106	751,611	5.48
Dayton MSA	6.42	2,643	357,569	1,897	246,772	47	5,195	14	30,491	4,601	640,027	1.99
Lima MSA	1.17	564	52,460	264	30,548	13	1,201	1	225	842	84,434	0.83
Mansfield MSA	0.53	224	24,258	155	13,062	2	127	0	0	381	37,447	0.12
OH non-MSA^^	8.93	4,256	430,095	1,933	184,161	195	20,597	18	33,071	6,402	667,924	8.83
Sandusky MSA^	0.21	96	15,973	50	4,738	1	9	0	0	147	20,720	0.00
Springfield MSA	1.57	746	76,102	324	50,484	51	6,051	6	10,155	1,127	142,792	0.78
Toledo MSA^^	4.65	2,371	277,597	920	117,880	28	2,384	13	28,364	3,332	426,225	7.55
OH Statewide with no P/M/F to serve an AA(s)	0	0	0	0	0	0	0	3	8,368	3	8,368	0

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

^ Evaluation period is January 1, 2012 to December 31, 2013.

^^ Evaluation period is January 1, 2014 to December 31, 2015.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OHIO				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						Market Share (%) by Geography [†]				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}						
Full Review:																
Cleveland MSA	3,690	20.19	5.68	3.50	13.81	10.03	41.98	37.13	38.53	49.35	3.49	2.80	2.94	3.36	3.74	
Columbus MSA	7,174	39.25	5.06	3.22	17.12	12.48	37.16	29.73	40.66	54.57	5.75	6.36	5.59	4.97	6.33	
Limited Review:																
Akron MSA	1,239	6.78	4.58	1.53	18.89	12.11	42.20	39.71	34.33	46.65	3.21	1.17	2.55	3.05	3.66	
Canton MSA	1,612	8.82	3.09	0.56	9.84	5.65	60.24	59.86	26.83	33.93	7.76	0.00	5.83	8.08	7.56	
Dayton MSA	1,058	5.79	4.44	1.51	18.39	12.19	44.16	42.16	33.02	44.14	3.02	2.26	2.00	3.19	3.17	
Lima MSA	193	1.06	5.60	0.52	10.43	10.36	51.30	54.40	32.67	34.72	3.85	2.78	6.33	4.51	2.65	
Mansfield MSA	73	0.40	0.00	0.00	20.04	4.11	49.63	58.90	30.33	36.99	1.74	0.00	0.00	2.37	1.30	
OH non-MSA ^{^^}	1,812	9.91	1.00	0.33	11.43	14.51	66.57	62.69	21.00	22.46	5.96	2.33	6.75	6.17	5.17	
Sandusky MSA [^]	27	0.15	0.00	0.00	22.76	3.70	51.83	44.44	25.41	51.85	1.61	0.00	0.00	1.03	3.15	
Springfield MSA	246	1.35	4.94	0.81	12.97	10.16	44.52	52.03	37.57	36.99	4.90	0.00	1.86	5.95	4.65	
Toledo MSA ^{^^}	1,153	6.31	5.77	2.08	12.85	9.28	48.96	43.19	32.41	45.45	6.69	6.45	7.18	6.63	6.69	

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Sandusky MSA, which is 2013 Peer Mortgage Data.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^] Evaluation period is January 1, 2012 to December 31, 2013.

^{^^} Evaluation period is January 1, 2014 to December 31, 2015.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Cleveland MSA	507	24.48	5.68	3.55	13.81	10.26	41.98	40.04	38.53	46.15	4.37	4.64	3.52	4.18	4.81	
Columbus MSA	544	26.27	5.06	4.96	17.12	12.68	37.16	31.07	40.66	51.29	5.88	9.59	4.41	6.16	5.78	
Limited Review:																
Akron MSA	150	7.24	4.58	3.33	18.89	9.33	42.20	48.67	34.33	38.67	5.02	5.26	1.56	6.37	5.42	
Canton MSA	224	10.82	3.09	3.13	9.84	13.39	60.24	66.96	26.83	16.52	9.39	11.11	7.27	11.29	3.37	
Dayton MSA	79	3.81	4.44	2.53	18.39	15.19	44.16	43.04	33.02	39.24	2.21	0.00	1.63	2.53	2.15	
Lima MSA	46	2.22	5.60	6.52	10.43	8.70	51.30	60.87	32.67	23.91	7.50	0.00	20.00	5.41	8.33	
Mansfield MSA	13	0.63	0.00	0.00	20.04	7.69	49.63	46.15	30.33	46.15	2.11	0.00	0.00	1.08	4.55	
OH non-MSA^^	345	16.66	1.00	0.29	11.43	15.94	66.57	62.61	21.00	21.16	6.94	0.00	9.47	6.21	8.24	
Sandusky MSA^	3	0.14	0.00	0.00	22.76	33.33	51.83	0.00	25.41	66.67	0.69	0.00	0.00	0.00	2.78	
Springfield MSA	32	1.55	4.94	3.13	12.97	15.63	44.52	53.13	37.57	28.13	1.74	0.00	0.00	1.90	2.15	
Toledo MSA^^	128	6.18	5.77	1.56	12.85	7.03	48.96	46.09	32.41	45.31	7.22	0.00	3.19	7.02	10.12	

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Sandusky MSA, which is 2013 Peer Mortgage Data.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^ Evaluation period is January 1, 2012 to December 31, 2013.

^^ Evaluation period is January 1, 2014 to December 31, 2015.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Cleveland MSA	5,156	19.54	5.68	2.11	13.81	9.10	41.98	37.24	38.53	51.55	4.88	5.95	6.29	5.02	4.43	
Columbus MSA	10,992	41.65	5.06	2.55	17.12	10.54	37.16	32.71	40.66	54.19	7.74	9.85	6.56	8.02	7.72	
Limited Review:																
Akron MSA	1,997	7.57	4.58	1.90	18.89	11.02	42.20	43.52	34.33	43.57	4.83	2.26	5.86	4.89	4.54	
Canton MSA	2,563	9.71	3.09	0.78	9.84	5.54	60.24	60.05	26.83	33.63	10.57	10.87	12.72	10.78	9.73	
Dayton MSA	1,500	5.68	4.44	1.07	18.39	14.07	44.16	47.80	33.02	37.07	3.36	1.26	3.13	3.78	3.08	
Lima MSA	324	1.23	5.60	10.80	10.43	12.04	51.30	45.68	32.67	31.48	9.40	17.39	8.89	10.98	6.72	
Mansfield MSA	138	0.52	0.00	0.00	20.04	10.87	49.63	47.83	30.33	41.30	3.21	0.00	1.96	2.24	4.92	
OH non-MSA^^	2,098	7.95	1.00	0.48	11.43	16.21	66.57	62.15	21.00	21.16	10.26	5.66	12.58	10.22	9.56	
Sandusky MSA^	66	0.25	0.00	0.00	22.76	4.55	51.83	53.03	25.41	42.42	2.00	0.00	0.78	2.15	2.37	
Springfield MSA	468	1.77	4.94	3.21	12.97	12.39	44.52	39.32	37.57	45.09	5.60	7.14	6.35	5.46	5.48	
Toledo MSA^^	1,089	4.13	5.77	2.11	12.85	8.63	48.96	51.42	32.41	37.83	12.16	11.59	13.59	13.29	10.42	

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Sandusky MSA, which is 2013 Peer Mortgage Data.

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^ Evaluation period is January 1, 2012 to December 31, 2013.

^^ Evaluation period is January 1, 2014 to December 31, 2015.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: OHIO					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****						
Full Review:																
Cleveland MSA	13	30.23	15.05	0.00	27.16	30.77	38.98	46.15	18.81	23.08	5.26	0.00	7.89	3.33	10.00	
Columbus MSA	14	32.56	21.87	28.57	27.23	14.29	32.02	35.71	18.88	21.43	2.75	0.00	2.44	4.55	2.50	
Limited Review:																
Akron MSA	5	11.63	15.36	0.00	23.22	20.00	36.44	20.00	24.98	60.00	1.82	0.00	0.00	4.76	0.00	
Canton MSA	2	4.65	12.01	0.00	13.54	50.00	42.53	50.00	31.92	0.00	0.00	0.00	0.00	0.00	0.00	
Dayton MSA	6	13.95	10.65	0.00	27.74	33.33	41.68	50.00	19.94	16.67	0.00	0.00	0.00	0.00	0.00	
Lima MSA	1	2.33	13.42	0.00	21.23	0.00	54.92	100.00	10.43	0.00	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	0	0.00	0.00	0.00	45.41	0.00	40.13	0.00	14.46	0.00	0.00	0.00	0.00	0.00	0.00	
OH non-MSA^^	1	2.33	4.86	0.00	19.83	0.00	56.25	0.00	19.07	100.00	2.33	0.00	0.00	0.00	20.00	
Sandusky MSA^	0	0.00	0.00	0.00	38.62	0.00	39.34	0.00	22.04	0.00	0.00	0.00	0.00	0.00	0.00	
Springfield MSA	0	0.00	18.92	0.00	15.56	0.00	45.05	0.00	20.47	0.00	0.00	0.00	0.00	0.00	0.00	
Toledo MSA^^	1	2.33	12.49	0.00	26.96	0.00	44.10	100.00	16.45	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Sandusky MSA, which is 2013 Peer Mortgage Data.

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

^ Evaluation period is January 1, 2012 to December 31, 2013.

^^ Evaluation period is January 1, 2014 to December 31, 2015.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: OHIO		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Cleveland MSA	7,197	30.02	7.53	5.60	13.00	12.07	38.46	41.09	40.64	41.24	6.04	5.08	7.10	6.69	5.49			
Columbus MSA	7,423	30.96	8.23	9.03	18.64	16.26	32.19	30.31	40.58	44.40	7.16	9.11	5.09	7.77	7.70			
Limited Review:																		
Akron MSA	2,153	8.98	7.48	5.62	16.15	17.74	36.08	34.93	40.30	41.71	6.07	5.63	6.83	6.15	6.01			
Canton MSA	1,662	6.93	6.47	5.60	9.38	8.66	52.56	55.05	31.59	30.69	9.32	10.11	10.36	10.22	8.05			
Dayton MSA	1,897	7.91	6.53	13.55	18.17	15.97	42.00	38.59	33.26	31.89	5.10	15.99	4.57	4.77	3.97			
Lima MSA	264	1.10	14.78	17.80	11.21	14.02	48.06	51.52	25.95	16.67	4.82	6.08	6.31	5.65	2.84			
Mansfield MSA	155	0.65	0.00	0.00	27.34	31.61	45.15	37.42	27.51	30.97	3.42	0.00	3.98	3.54	2.98			
OH non-MSA^^	1,933	8.06	1.86	1.09	15.38	13.86	62.65	66.99	20.10	18.05	6.61	2.00	6.37	7.37	5.78			
Sandusky MSA^	50	0.21	0.00	0.00	24.42	18.00	50.37	66.00	25.21	16.00	1.46	0.00	1.29	1.72	1.20			
Springfield MSA	324	1.35	8.32	10.80	17.66	20.99	34.31	29.01	39.71	39.20	4.34	8.00	9.62	3.38	2.81			
Toledo MSA^^	920	3.84	6.44	5.00	13.84	11.96	44.91	51.09	34.54	31.96	7.26	10.83	7.98	7.94	6.05			

* Based on 2014 Peer Small Business Data -- US and PR for all AAs except for the Sandusky MSA, which is 2013 Peer Small Business Data.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

^ Evaluation period is January 1, 2012 to December 31, 2013.

^^ Evaluation period is January 1, 2014 to December 31, 2015.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: OHIO					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography [*]				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans						
Full Review:																
Cleveland MSA	52	7.77	2.54	0.00	7.81	9.62	44.44	34.62	45.17	55.77	21.05	0.00	20.00	7.69	34.55	
Columbus MSA	226	33.78	3.18	1.77	11.55	1.77	49.31	51.77	35.89	44.69	17.54	100.00	8.70	14.81	22.94	
Limited Review:																
Akron MSA	22	3.29	1.44	0.00	12.49	18.18	50.76	54.55	35.31	27.27	33.33	0.00	40.00	36.84	20.00	
Canton MSA	32	4.78	1.26	0.00	5.72	3.13	70.79	78.13	22.22	18.75	16.67	0.00	33.33	17.65	11.11	
Dayton MSA	47	7.03	1.93	0.00	10.30	25.53	56.49	59.57	31.28	14.89	6.93	0.00	46.15	5.34	1.72	
Lima MSA	13	1.94	1.69	7.69	1.69	0.00	78.27	92.31	18.35	0.00	2.31	50.00	0.00	1.90	0.00	
Mansfield MSA	2	0.30	0.00	0.00	6.19	0.00	60.09	100.00	33.72	0.00	0.00	0.00	0.00	0.00	0.00	
OH non-MSA ^{^^}	195	29.15	0.21	0.00	4.94	5.64	68.19	73.33	26.64	21.03	7.73	0.00	13.79	9.19	4.35	
Sandusky MSA [^]	1	0.15	0.00	0.00	7.37	0.00	60.26	100.00	32.37	0.00	7.69	0.00	0.00	14.29	0.00	
Springfield MSA	51	7.62	2.49	0.00	4.52	0.00	33.48	27.45	59.50	72.55	8.00	0.00	0.00	6.25	8.79	
Toledo MSA ^{^^}	28	4.19	1.54	0.00	4.87	3.57	63.02	75.00	30.57	21.43	3.53	0.00	0.00	3.19	4.81	

* Based on 2014 Peer Small Business Data -- US and PR for all AAs except for the Sandusky MSA, which is 2013 Peer Small Business Data.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

[^] Evaluation period is January 1, 2012 to December 31, 2013.

^{^^} Evaluation period is January 1, 2014 to December 31, 2015.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: OHIO				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [†]				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	3,690	20.19	21.71	9.69	17.29	23.48	20.69	23.92	40.30	42.91	4.01	3.24	3.58	3.96	4.46
Columbus MSA	7,174	39.25	20.96	8.85	16.94	19.95	20.45	21.33	41.66	49.87	6.77	6.92	5.71	5.41	8.07
Limited Review:															
Akron MSA	1,239	6.78	20.77	10.86	17.80	23.31	22.01	26.32	39.42	39.52	3.64	3.99	2.91	4.21	3.65
Canton MSA	1,612	8.82	19.27	7.66	19.02	26.77	21.68	27.28	40.03	38.29	8.93	9.85	10.19	7.87	8.72
Dayton MSA	1,058	5.79	20.98	9.49	18.16	23.39	20.62	25.12	40.24	41.99	3.51	3.10	3.58	3.11	3.83
Lima MSA	193	1.06	21.47	13.51	17.45	29.73	22.40	23.78	38.69	32.97	4.24	4.42	3.53	4.48	4.51
Mansfield MSA	73	0.40	18.37	12.33	20.51	20.55	21.55	27.40	39.57	39.73	2.06	3.13	1.55	2.61	1.72
OH non-MSA^^	1,812	9.91	19.11	9.84	18.16	27.62	21.83	25.82	40.91	36.73	6.94	7.76	6.60	6.86	7.05
Sandusky MSA^	27	0.15	18.85	0.00	20.51	7.41	20.74	14.81	39.89	77.78	1.82	0.00	0.53	0.88	3.43
Springfield MSA	246	1.35	19.82	11.72	17.52	32.64	22.90	24.69	39.76	30.96	5.88	6.90	6.35	5.31	5.67
Toledo MSA^^	1,153	6.31	21.88	9.53	16.99	25.68	20.48	26.74	40.65	38.04	7.52	6.40	8.06	7.46	7.48

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Sandusky MSA, which is 2013 Peer Mortgage Data.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.6% of loans originated and purchased by bank.

^ Evaluation period is January 1, 2012 to December 31, 2013.

^^ Evaluation period is January 1, 2014 to December 31, 2015.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: OHIO				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						Market Share [†]				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Cleveland MSA	507	24.48	21.71	10.38	17.29	20.41	20.69	26.55	40.30	45.11	4.51	4.66	4.25	4.98	4.35	
Columbus MSA	544	26.27	20.96	10.19	16.94	28.05	20.45	24.42	41.66	46.92	6.18	7.07	6.53	5.74	6.01	
Limited Review:																
Akron MSA	150	7.24	20.77	14.97	17.80	20.41	22.01	16.33	39.42	48.30	5.28	7.25	7.87	2.10	5.24	
Canton MSA	224	10.82	19.27	17.19	19.02	28.05	21.68	19.00	40.03	35.75	9.91	7.45	14.17	6.80	10.20	
Dayton MSA	79	3.81	20.98	11.39	18.16	11.39	20.62	27.85	40.24	49.37	2.59	5.97	3.88	2.45	1.49	
Lima MSA	46	2.22	21.47	15.22	17.45	10.87	22.40	30.43	38.69	43.48	7.89	0.00	5.88	18.18	7.69	
Mansfield MSA	13	0.63	18.37	15.38	20.51	15.38	21.55	23.08	39.57	46.15	2.25	0.00	0.00	2.22	4.00	
OH non-MSA ^{^^}	345	16.66	19.11	11.34	18.16	24.42	21.83	31.40	40.91	32.85	7.22	9.73	7.63	6.99	6.43	
Sandusky MSA [^]	3	0.14	18.85	0.00	20.51	0.00	20.74	0.00	39.89	100.00	0.72	0.00	0.00	0.00	1.49	
Springfield MSA	32	1.55	19.82	21.88	17.52	25.00	22.90	21.88	39.76	31.25	1.96	11.76	0.00	2.22	1.10	
Toledo MSA ^{^^}	128	6.18	21.88	12.00	16.99	21.60	20.48	26.40	40.65	40.00	7.29	6.31	4.09	6.64	10.34	

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Sandusky MSA, which is 2013 Peer Mortgage Data.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

[^] Evaluation period is January 1, 2012 to December 31, 2013.

^{^^} Evaluation period is January 1, 2014 to December 31, 2015.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: OHIO															
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	5,156	19.54	21.71	6.88	17.29	16.26	20.69	24.81	40.30	52.05	5.52	7.35	5.80	5.81	5.00
Columbus MSA	10,992	41.65	20.96	6.90	16.94	16.46	20.45	23.95	41.66	52.70	9.25	10.34	8.74	9.32	9.20
Limited Review:															
Akron MSA	1,997	7.57	20.77	6.98	17.80	18.24	22.01	27.00	39.42	47.78	5.48	5.72	6.34	5.26	5.23
Canton MSA	2,563	9.71	19.27	6.37	19.02	17.14	21.68	25.23	40.03	51.26	11.99	13.26	10.36	13.66	11.47
Dayton MSA	1,500	5.68	20.98	7.22	18.16	17.22	20.62	23.35	40.24	52.21	4.03	3.69	3.76	4.00	4.22
Lima MSA	324	1.23	21.47	9.21	17.45	16.19	22.40	28.57	38.69	46.03	9.88	11.54	6.15	10.49	11.16
Mansfield MSA	138	0.52	18.37	4.48	20.51	14.93	21.55	32.84	39.57	47.76	3.66	1.69	2.24	6.95	2.64
OH non-MSA^^	2,098	7.95	19.11	9.51	18.16	22.50	21.83	29.21	40.91	38.77	11.47	14.91	11.62	12.55	9.95
Sandusky MSA^	66	0.25	18.85	1.54	20.51	15.38	20.74	13.85	39.89	69.23	2.21	0.00	3.04	0.93	2.78
Springfield MSA	468	1.77	19.82	10.50	17.52	14.88	22.90	22.32	39.76	52.30	6.69	14.63	6.74	4.63	6.41
Toledo MSA^^	1,089	4.13	21.88	8.29	16.99	23.11	20.48	27.21	40.65	41.38	13.66	14.86	16.96	14.27	11.52

* Based on 2014 Peer Mortgage Data -- US and PR for all AAs except for the Sandusky MSA, which is 2013 Peer Mortgage Data.

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.5% of loans originated and purchased by bank.

^ Evaluation period is January 1, 2012 to December 31, 2013.

^^ Evaluation period is January 1, 2014 to December 31, 2015.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: OHIO					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [†]	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cleveland MSA	7,210	30.04	77.40	64.51	77.36	11.51	11.12	6.04	9.44
Columbus MSA	7,437	30.98	77.59	65.93	74.17	13.20	12.63	7.16	13.75
Limited Review:									
Akron MSA	2,153	8.97	78.38	62.56	76.08	11.61	12.31	6.07	10.15
Canton MSA	1,662	6.92	77.89	67.27	79.60	10.23	10.17	9.32	16.49
Dayton MSA	1,897	7.90	77.25	66.58	67.63	19.50	12.86	5.10	8.64
Lima MSA	264	1.10	73.94	57.95	71.21	17.42	11.36	4.82	7.49
Mansfield MSA	155	0.65	75.51	72.90	84.52	9.03	6.45	3.42	5.63
OH non-MSA^^	1,933	8.05	76.65	65.86	79.93	10.61	9.47	6.61	10.68
Sandusky MSA^	50	0.21	69.86	52.00	82.00	12.00	6.00	1.46	2.04
Springfield MSA	324	1.35	76.97	57.10	62.96	17.59	19.44	4.34	6.33
Toledo MSA^^	920	3.83	75.16	62.07	76.20	9.13	14.67	7.26	10.55

* Based on 2014 Peer Small Business Data -- US and PR for all AAs except for the Sandusky MSA, which is 2013 Peer Small Business Data.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.07% of small loans to businesses originated and purchased by the bank.

^ Evaluation period is January 1, 2012 to December 31, 2013.

^^ Evaluation period is January 1, 2014 to December 31, 2015.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OHIO			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [†]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Cleveland MSA	52	7.77	96.73	69.23	88.46	11.54	0.00	21.05	32.61
Columbus MSA	226	33.78	96.71	75.66	69.03	19.47	11.50	17.54	26.28
Limited Review:									
Akron MSA	22	3.29	97.33	100.00	90.91	9.09	0.00	33.33	47.62
Canton MSA	32	4.78	98.23	90.63	90.63	3.13	6.25	16.67	42.11
Dayton MSA	47	7.03	97.48	74.47	70.21	17.02	12.77	6.93	8.55
Lima MSA	13	1.94	98.73	92.31	76.92	15.38	7.69	2.31	3.26
Mansfield MSA	2	0.30	98.39	0.00	100.00	0.00	0.00	0.00	0.00
OH non-MSA ^{^^}	195	29.15	98.83	78.97	72.31	15.38	12.31	7.73	9.05
Sandusky MSA [^]	1	0.15	98.40	100.00	100.00	0.00	0.00	7.69	16.67
Springfield MSA	51	7.62	98.42	60.78	64.71	23.53	11.76	8.00	6.17
Toledo MSA ^{^^}	28	4.19	96.80	100.00	75.00	17.86	7.14	3.53	4.30

* Based on 2014 Peer Small Business Data -- US and PR for all AAs except for the Sandusky MSA, which is 2013 Peer Small Business Data.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 2.05% of small loans to farms originated and purchased by the bank.

[^] Evaluation period is January 1, 2012 to December 31, 2013.

^{^^} Evaluation period is January 1, 2014 to December 31, 2015.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: OHIO		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cleveland MSA	28	10,259	61	58,426	89	68,955	26.56	1	2,874
Columbus MSA	31	11,647	229	97,671	260	109,318	42.10	2	3,720
Limited Review:									
Akron MSA	17	4,143	26	10,766	43	14,909	5.74	0	0
Canton MSA	13	795	44	7,690	57	8,485	3.27	1	998
Dayton MSA	16	2,068	28	5,156	44	7,224	2.78	0	0
Lima MSA	3	181	5	616	8	797	0.31	0	0
Mansfield MSA	9	92	6	399	15	491	0.19	0	0
OH non-MSA	28	7,941	65	13,435	93	21,376	8.23	0	0
Sandusky MSA^	0	0	1	10	1	10	0.00	0	0
Springfield MSA	7	387	17	2,532	24	2,919	1.12	0	0
Toledo MSA^^	15	3,714	43	16,954	58	20,668	7.96	0	0
OH Statewide with P/M/F to serve an AA(s)	0	0	1	4,500	1	4,500	1.73	0	0

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

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

^ Evaluation period is January 1, 2012 to December 31, 2013.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: OHIO Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cleveland MSA	31.26	93	26.05	5.38	9.68	46.24	38.70	25	8	0	-1	+9	+9	10.38	17.42	38.71	33.49
Columbus MSA	11.28	84	23.53	5.95	20.24	30.95	40.48	25	15	-4	+7	+4	+3	10.42	19.84	34.92	34.21
Limited Review:																	
Akron MSA	5.90	28	7.84	7.14	17.86	28.57	46.43	14	2	0	+3	+3	+6	9.27	20.30	39.41	31.03
Canton MSA	11.04	28	7.84	7.14	3.57	57.14	32.15	6	3	-1	0	+3	+1	4.77	12.26	57.20	25.78
Dayton MSA	4.01	14	3.92	0.00	0.00	78.57	21.43	0	0	0	0	0	0	7.08	22.23	42.05	28.64
Lima MSA	1.67	4	1.12	0.00	0.00	100.0 0	0.00	0	1	0	0	-1	0	9.04	15.51	48.05	27.40
Mansfield MSA	0.25	1	.28	0.00	0.00	100.0 0	0.00	0	0	0	0	0	0	0.00	27.88	45.91	26.21
OH non-MSA	17.80	71	19.89	1.41	22.54	63.38	12.67	1	13	+1	-2	-9	-2	1.83	13.63	64.98	19.23
Sandusky MSA	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	0.00	0.00	0.00
Springfield MSA	1.57	3	.84	0.00	33.33	33.34	33.33	0	1	-1	0	0	0	10.36	16.17	41.08	32.38
Toledo MSA	15.21	31	8.69	0.00	16.13	54.84	29.03	1	8	-2	0	-5	0	9.43	16.63	45.30	27.78

Table 1. Lending Volume

LENDING VOLUME		Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Pittsburgh MSA	83.66	3,558	565,923	2,869	256,036	17	1,457	28	96,725	6,472	920,141	91.32
Limited Review:												
Erie MSA	5.69	287	41,888	148	10,164	5	165	0	0	440	52,217	1.68
PA non-MSA	10.65	534	59,407	283	27,645	4	180	3	3,900	824	91,132	7.00
PA Statewide with no P/M/F to serve AA(s)	0	0	0	0	0	0	0	1	5,695	1	5,695	0

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: PENNSYLVANIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography [*]				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}						
Full Review:																
Pittsburgh MSA	1,328	85.46	2.22	1.05	15.05	17.17	52.43	46.61	30.30	35.17	1.29	0.96	1.53	1.46	1.04	
Limited Review:																
Erie MSA	113	7.27	3.95	1.77	13.43	7.96	47.72	37.17	34.90	53.10	0.92	0.00	0.31	0.90	1.15	
PA non-MSA	113	7.27	1.86	0.00	3.85	0.88	70.12	71.68	24.16	27.43	2.85	0.00	0.00	2.52	3.57	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: PENNSYLVANIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Pittsburgh MSA	295	82.17	2.22	2.71	15.05	17.29	52.43	56.27	30.30	23.73	1.00	1.43	1.37	0.98	0.81	
Limited Review:																
Erie MSA	24	6.69	3.95	0.00	13.43	20.83	47.72	50.00	34.90	29.17	0.57	0.00	1.68	0.46	0.34	
PA non-MSA	40	11.14	1.86	0.00	3.85	7.50	70.12	57.50	24.16	35.00	4.97	0.00	100.00	5.04	2.50	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Pittsburgh MSA	1,927	78.40	2.22	0.99	15.05	12.87	52.43	54.49	30.30	31.66	1.60	2.27	2.13	1.89	1.04	
Limited Review:																
Erie MSA	150	6.10	3.95	1.33	13.43	14.67	47.72	44.67	34.90	39.33	0.37	0.00	1.35	0.34	0.13	
PA non-MSA	381	15.50	1.86	0.26	3.85	0.00	70.12	63.25	24.16	36.48	10.63	0.00	0.00	11.67	8.33	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: PENNSYLVANIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****						
Full Review:																
Pittsburgh MSA	8	100.00	8.94	0.00	21.84	12.50	44.23	25.00	25.00	62.50	1.49	0.00	0.00	2.30	2.44	
Limited Review:																
Erie MSA	0	0.00	22.73	0.00	13.35	0.00	27.67	0.00	36.25	0.00	0.00	0.00	0.00	0.00	0.00	
PA non-MSA	0	0.00	0.95	0.00	22.63	0.00	54.34	0.00	22.09	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																				
Pittsburgh MSA	2,854	86.88	4.18	3.99	13.48	13.98	48.49	51.51	33.25	30.52	2.16	2.04	2.68	2.25	1.90					
Limited Review:																				
Erie MSA	148	4.51	11.42	8.11	14.25	13.51	42.86	44.59	31.47	33.78	0.86	1.32	0.80	0.74	0.94					
PA non-MSA	283	8.61	2.00	1.06	10.38	8.83	58.65	56.54	28.96	33.57	5.78	0.00	5.83	4.74	8.70					

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: PENNSYLVANIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Pittsburgh MSA	17	65.38	1.34	0.00	9.38	5.88	62.19	70.59	27.01	23.53	5.56	0.00	0.00	6.90	0.00	
Limited Review:																
Erie MSA	5	19.23	1.37	0.00	9.10	60.00	63.13	40.00	26.40	0.00	0.00	0.00	0.00	0.00	0.00	
PA non-MSA	4	15.38	0.00	0.00	1.19	0.00	69.05	50.00	29.76	50.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: PENNSYLVANIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Pittsburgh MSA	1,328	85.46	19.29	9.51	17.75	23.74	21.81	22.82	41.16	43.93	1.45	1.76	1.55	1.47	1.35	
Limited Review:																
Erie MSA	113	7.27	20.77	6.25	17.99	24.11	21.23	31.25	40.02	38.39	1.02	0.66	1.05	1.08	1.02	
PA non-MSA	113	7.27	17.84	10.81	18.55	22.52	21.67	27.93	41.95	38.74	3.25	0.00	1.54	5.13	3.64	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share [†]				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Pittsburgh MSA	295	82.17	19.29	18.15	17.75	26.71	21.81	23.63	41.16	31.51	1.03	1.12	1.26	1.19	0.82	
Limited Review:																
Erie MSA	24	6.69	20.77	8.33	17.99	20.83	21.23	33.33	40.02	37.50	0.58	0.99	0.00	0.87	0.54	
PA non-MSA	40	11.14	17.84	10.26	18.55	7.69	21.67	23.08	41.95	58.97	5.11	8.70	3.03	2.22	6.67	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Pittsburgh MSA	1,927	78.40	19.29	8.77	17.75	19.61	21.81	26.27	41.16	45.35	1.74	3.05	2.11	1.82	1.39	
Limited Review:																
Erie MSA	150	6.10	20.77	11.49	17.99	21.62	21.23	20.95	40.02	45.95	0.41	0.00	0.35	0.44	0.47	
PA non-MSA	381	15.50	17.84	7.96	18.55	19.63	21.67	24.14	41.95	48.28	11.74	14.71	8.25	13.11	12.08	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [†]	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Pittsburgh MSA	2,869	86.94	77.54	71.00	82.40	9.38	8.23	2.16	3.60
Limited Review:									
Erie MSA	148	4.48	76.44	77.03	86.49	7.43	6.08	0.86	1.95
PA non-MSA	283	8.58	77.20	77.74	80.92	8.48	10.60	5.78	12.79

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.76% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: PENNSYLVANIA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [†]	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Pittsburgh MSA	17	65.38	97.02	82.35	82.35	5.88	11.76	5.56	7.41
Limited Review:									
Erie MSA	5	19.23	97.57	80.00	100.00	0.00	0.00	0.00	0.00
PA non-MSA	4	15.38	100.00	100.00	100.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 3.85% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: PENNSYLVANIA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Pittsburgh MSA	6	6,896	56	33,389	62	40,285	95.58	0	0
Limited Review:									
Erie MSA	2	1,641	2	2	4	1,643	3.09	0	0
PA non-MSA	2	212	2	10	4	222	0.53	0	0

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: PENNSYLVANIA Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Pittsburgh MSA	91.32	37	84.09	5.41	24.32	43.24	27.03	1	5	0	-2	-2	0	4.27	17.32	49.29	28.68
Limited Review:																	
Erie MSA	1.68	2	4.55	0.00	50.00	0.00	50.00	0	2	-1	0	-1	0	8.42	16.82	42.19	31.78
PA non-MSA	7.00	5	11.36	0.00	20.00	40.00	40.00	0	2	0	0	-2	0	2.23	5.59	68.48	23.70

Table 1. Lending Volume

LENDING VOLUME												
Geography: WEST VIRGINIA												
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015												
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Charleston MSA^	12.37	343	44,188	215	28,122	5	697	4	18,221	567	91,228	38.49
WV non-MSA	42.75	1,483	166,228	465	61,103	9	359	3	43,700	1,960	271,390	26.88
Limited Review:												
Huntington MSA^	9.81	297	34,184	147	17,347	4	425	2	1,719	450	53,675	7.33
Morgantown MSA	26.04	1,006	178,130	185	31,613	0	0	3	17,830	1,194	227,573	21.26
Parkersburg MSA	9.03	321	38,885	91	7,441	0	0	2	6,920	414	53,246	6.05
WV Statewide with no P/M/F to serve AA(s)	0	0	0	0	0	0	0	12	48,992	12	48,992	0

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

^ Evaluation period is January 1, 2014 through December 31, 2015.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: WEST VIRGINIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Charleston MSA^	172	12.17	0.00	0.00	14.28	15.12	61.69	54.07	24.03	30.81	5.27	0.00	6.86	4.73	5.72						
WV non-MSA	518	36.66	0.08	0.00	5.12	3.86	61.75	55.79	33.04	40.35	9.15	0.00	8.41	10.39	8.00						
Limited Review:																					
Huntington MSA^	157	11.11	2.16	5.73	12.16	8.28	51.67	45.22	34.01	40.76	3.98	8.00	5.84	3.81	3.78						
Morgantown MSA	385	27.25	1.70	4.42	12.63	15.06	49.58	43.90	36.09	36.62	5.49	8.47	6.78	5.50	4.86						
Parkersburg MSA	181	12.81	0.00	0.00	12.53	13.81	72.78	69.06	14.69	17.13	5.74	0.00	7.69	5.76	4.42						

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^ Evaluation period is January 1, 2014 through December 31, 2015.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Charleston MSA^	40	10.31	0.00	0.00	14.28	7.50	61.69	70.00	24.03	22.50	2.78	0.00	0.00	3.48	2.38	
WV non-MSA	189	48.71	0.08	0.53	5.12	4.23	61.75	62.43	33.04	32.80	12.93	0.00	5.00	17.07	8.33	
Limited Review:																
Huntington MSA^	43	11.08	2.16	0.00	12.16	18.60	51.67	48.84	34.01	32.56	4.96	0.00	9.76	5.62	3.14	
Morgantown MSA	85	21.91	1.70	0.00	12.63	20.00	49.58	52.94	36.09	27.06	11.89	0.00	17.39	13.89	6.67	
Parkersburg MSA	31	7.99	0.00	0.00	12.53	19.35	72.78	64.52	14.69	16.13	6.45	0.00	15.00	6.38	2.44	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^ Evaluation period is January 1, 2014 through December 31, 2015.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography [*]				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}						
Full Review:																
Charleston MSA [^]	131	7.95	0.00	0.00	14.28	8.40	61.69	62.60	24.03	29.01	5.24	0.00	4.10	5.83	4.41	
WV non-MSA	776	47.06	0.08	0.13	5.12	4.12	61.75	55.15	33.04	40.59	10.56	0.00	1.75	11.11	11.14	
Limited Review:																
Huntington MSA [^]	97	5.88	2.16	0.00	12.16	8.25	51.67	54.64	34.01	37.11	3.75	0.00	3.67	3.83	3.81	
Morgantown MSA	536	32.50	1.70	1.31	12.63	13.43	49.58	42.91	36.09	42.35	8.96	6.67	13.33	9.29	7.45	
Parkersburg MSA	109	6.61	0.00	0.00	12.53	7.34	72.78	80.73	14.69	11.93	2.83	0.00	3.33	2.46	4.00	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^] Evaluation period is January 1, 2014 through December 31, 2015.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****						
Full Review:																
Charleston MSA^	0	0.00	0.00	0.00	42.18	0.00	33.73	0.00	24.09	0.00	0.00	0.00	0.00	0.00	0.00	
WV non-MSA	0	0.00	7.49	0.00	14.73	0.00	45.55	0.00	32.23	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Huntington MSA^	0	0.00	16.95	0.00	24.97	0.00	33.00	0.00	25.09	0.00	0.00	0.00	0.00	0.00	0.00	
Morgantown MSA	0	0.00	27.77	0.00	8.63	0.00	37.18	0.00	26.42	0.00	0.00	0.00	0.00	0.00	0.00	
Parkersburg MSA	0	0.00	0.00	0.00	32.73	0.00	56.28	0.00	10.99	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

^ Evaluation period is January 1, 2014 through December 31, 2015.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [†]													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Charleston MSA [^]	215	19.49	0.00	0.00	31.50	37.67	44.52	44.65	23.98	17.67	4.08	0.00	5.71	3.86	3.24									
WV non-MSA	465	42.16	2.40	0.43	13.45	14.19	52.32	43.66	31.84	41.72	6.80	3.23	8.79	6.87	7.86									
Limited Review:																								
Huntington MSA [^]	147	13.33	4.79	2.04	20.50	17.69	38.92	42.18	35.78	38.10	3.76	0.00	3.95	5.18	3.65									
Morgantown MSA	185	16.77	10.50	7.57	15.89	17.84	45.29	51.35	27.99	23.24	2.52	1.74	2.18	3.57	1.58									
Parkersburg MSA	91	8.25	0.00	0.00	23.24	25.27	63.32	64.84	13.44	9.89	2.90	0.00	2.17	3.09	4.21									

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

[^] Evaluation period is January 1, 2014 through December 31, 2015.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Charleston MSA^	5	27.78	0.00	0.00	10.67	0.00	71.91	40.00	17.42	60.00	0.00	0.00	0.00	0.00	0.00	
WV non-MSA	9	50.00	0.34	0.00	5.10	0.00	65.99	77.78	28.57	22.22	9.09	0.00	0.00	10.53	0.00	
Limited Review:																
Huntington MSA^	4	22.22	1.46	0.00	7.30	25.00	51.82	50.00	39.42	25.00	17.39	0.00	100.00	28.57	9.09	
Morgantown MSA	0	0.00	2.26	0.00	20.30	0.00	42.11	0.00	35.34	0.00	0.00	0.00	0.00	0.00	0.00	
Parkersburg MSA	0	0.00	0.00	0.00	13.16	0.00	77.63	0.00	9.21	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

^ Evaluation period is January 1, 2014 through December 31, 2015.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share [*]				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Charleston MSA [^]	172	12.17	18.63	14.20	18.03	23.08	21.19	21.89	42.15	40.83	6.23	5.42	5.49	6.08	6.89	
WV non-MSA	518	36.66	19.14	4.73	16.66	16.77	19.79	26.82	44.42	51.68	10.39	7.14	15.05	13.08	8.46	
Limited Review:																
Huntington MSA [^]	157	11.11	20.97	7.74	17.03	16.77	19.33	32.90	42.68	42.58	4.55	10.00	2.79	5.94	3.79	
Morgantown MSA	385	27.25	19.02	2.65	15.08	15.87	18.87	27.78	47.03	53.70	6.73	6.25	5.63	8.25	6.34	
Parkersburg MSA	181	12.81	20.58	10.11	16.48	23.03	23.38	27.53	39.56	39.33	6.43	5.38	4.88	8.38	6.56	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by bank.

[^] Evaluation period is January 1, 2014 through December 31, 2015.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Charleston MSA^	40	10.31	18.63	20.00	18.03	25.00	21.19	32.50	42.15	22.50	3.05	5.41	5.97	4.62	0.00
WV non-MSA	189	48.71	19.14	13.23	16.66	17.46	19.79	20.11	44.42	49.21	13.67	14.63	18.87	18.00	9.70
Limited Review:															
Huntington MSA^	43	11.08	20.97	16.28	17.03	27.91	19.33	18.60	42.68	37.21	5.41	5.56	8.57	6.85	3.49
Morgantown MSA	85	21.91	19.02	15.85	15.08	28.05	18.87	20.73	47.03	35.37	13.08	30.00	24.00	14.29	6.76
Parkersburg MSA	31	7.99	20.58	22.58	16.48	19.35	23.38	19.35	39.56	38.71	6.80	9.09	6.25	2.78	8.77

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

^ Evaluation period is January 1, 2014 through December 31, 2015.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share [†]				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Charleston MSA [^]	131	7.95	18.63	9.38	18.03	14.84	21.19	28.13	42.15	47.66	5.79	5.95	3.83	5.09	6.90	
WV non-MSA	776	47.06	19.14	5.24	16.66	12.98	19.79	25.43	44.42	56.36	12.34	30.77	18.37	18.56	8.22	
Limited Review:																
Huntington MSA [^]	97	5.88	20.97	7.45	17.03	21.28	19.33	25.53	42.68	45.74	4.07	3.41	5.26	4.32	3.71	
Morgantown MSA	536	32.50	19.02	3.80	15.08	13.09	18.87	25.05	47.03	58.06	11.04	13.04	12.86	10.17	10.80	
Parkersburg MSA	109	6.61	20.58	11.11	16.48	21.30	23.38	22.22	39.56	45.37	3.27	3.70	4.40	3.25	2.70	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by bank.

[^] Evaluation period is January 1, 2014 through December 31, 2015.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [†]	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Charleston MSA [^]	215	19.49	71.34	52.56	72.56	13.95	13.49	4.08	6.39
WV non-MSA	465	42.16	72.84	57.63	68.60	16.13	15.27	6.80	13.17
Limited Review:									
Huntington MSA [^]	147	13.33	72.09	60.54	74.83	10.20	14.97	3.76	6.18
Morgantown MSA	185	16.77	75.80	67.03	60.54	17.30	22.16	2.52	4.36
Parkersburg MSA	91	8.25	76.22	62.64	81.32	7.69	10.99	2.90	4.82

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.70% of small loans to businesses originated and purchased by the bank.

[^] Evaluation period is January 1, 2014 through December 31, 2015.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: WEST VIRGINIA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Charleston MSA [^]	5	27.78	97.19	40.00	40.00	40.00	20.00	0.00	0.00
WV non-MSA	9	50.00	97.62	100.00	88.89	11.11	0.00	9.09	25.00
Limited Review:									
Huntington MSA [^]	4	22.22	96.35	50.00	75.00	0.00	25.00	17.39	20.00
Morgantown MSA	0	0.00	98.50	0.00	0.00	0.00	0.00	0.00	0.00
Parkersburg MSA	0	0.00	98.68	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

[^] Evaluation period is January 1, 2014 through December 31, 2015.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: WEST VIRGINIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Charleston MSA	4	81	25	134	29	215	2.22	0	0
WV non-MSA	3	27	13	4,396	16	4,423	45.58	0	0
Limited Review:									
Huntington MSA	4	83	3	4,872	7	4,955	51.07	0	0
Morgantown MSA	2	26	8	78	10	104	1.07	0	0
Parkersburg MSA	0	0	7	7	7	6	0.06	0	0

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: WEST VIRGINIA Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Charleston MSA	38.49	7	23.33	0.00	42.86	57.14	0.00	1	1	0	0	0	0	0.00	17.01	60.52	22.47
WV non-MSA	26.88	12	40.00	8.33	25.00	50.00	16.67	0	0	0	0	0	0	0.72	7.65	60.17	31.46
Limited Review:																	
Huntington MSA	7.33	2	6.67	0.00	0.00	0.00	100.0	0	0	0	0	0	0	5.34	15.26	49.49	29.92
Morgantown MSA	21.26	7	23.33	0.00	0.00	0.00	0.00	0	1	0	-1	0	0	10.98	13.74	41.79	32.01
Parkersburg MSA	6.05	2	6.67	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	15.81	70.92	13.26

