



PUBLIC DISCLOSURE

May 4, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Huntington National Bank
Charter Number: 7745

17 South High Street
Columbus, Ohio 43215

Office of the Comptroller of the Currency

Large Bank Supervision
Constitution Center
400 7th Street SW
Washington, DC 20219-0001

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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Overall CRA Rating

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

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

Performance Levels	The 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 Lending Test rating is based on performance across all rating areas. The overall conclusions are a weighted average, based on deposits, of the four multi-state metropolitan statistical areas (MMSA) and eight state ratings, with the performances in the states of Ohio and Michigan carrying the greatest weights.
- The Investment Test rating is based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test.
- The Service Test rating is based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test.

Lending in Assessment Area

A substantial majority of the bank's loans were in its AAs. The bank originated and purchased, in aggregate, 85.9 percent by number and 84.2 percent by dollar volume of its total loans inside the bank's combined AAs during the evaluation period. This analysis was performed at the bank, rather than at the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This performance factored positively into the overall analysis of the geographic distribution of lending by income level of the geographies.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000)				Total \$(000)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	194,109	88.3	25,727	11.7	219,836	29,988,097	83.3	6,009,287	16.7	35,997,384
Small Business	69,670	80.0	17,411	20.0	87,081	7,508,281	88.2	1,008,562	11.8	8,516,843
Small Farm	1,442	73.8	512	26.2	1,954	109,690	80.4	26,704	19.6	136,394
Total	265,221	85.9	43,650	14.1	308,871	37,606,068	84.2	7,044,553	15.8	44,650,621

Description of Institution

HNB is an interstate financial institution headquartered in Columbus, Ohio. HNB is a wholly owned subsidiary of Huntington Bancshares Incorporated (HBI), headquartered in Columbus, Ohio. As of December 31, 2019, HBI had total assets of \$109.0 billion. The holding company is a diversified financial services company providing banking, insurance, investments, mortgage loans, and consumer finance through HNB.

As of December 31, 2019, HNB had total assets of \$108.7 billion, total deposits of \$85.7 billion and a tier 1 capital base of \$11.7 billion. All HNB's deposits were held in domestic U.S. offices. HNB's net loans and leases were \$75.4 billion, representing 69.4 percent of total assets. Composition of the bank's domestic loan portfolio was 40.9 percent real estate loans, predominantly loans secured by 1-4 family residential properties, 29.9 percent commercial and industrial loans, 22.9 percent loans to individuals for household, family and personal purposes, and 6.3 percent miscellaneous other loans and leases. Farm and agricultural loans comprised 0.3 percent of the overall loan portfolio. At the request of HNB and in accordance with provisions of the CRA, this evaluation considered affiliate activities in CD lending and investments. Refer to Appendix A for a complete list of subsidiaries, affiliates, and products considered.

HBI completed one acquisition transaction during the evaluation period. On August 16, 2016, HBI acquired all outstanding capital stock of FirstMerit Corporation (FirstMerit) which resulted in the merger of their respective subsidiary banks.

As of December 31, 2019, HNB was a full-service bank operating 909 branches and 1,439 automated teller machines (ATMs) within its retail footprint. The bank conducted business within four MMSAs and eight states. The four MMSAs were Cincinnati OH-KY-IN MMSA, Weirton-Steubenville, WV-OH MMSA, Wheeling, WV-OH MMSA, and Youngstown-Warren-Boardman, OH-PA MMSA. The eight states that comprised HNB's retail footprint were Florida, Illinois, Indiana, Michigan, Ohio, Pennsylvania, West Virginia, and Wisconsin. This PE contains the OCC's evaluation of HNB's performance within HNB's 48 assessment areas (AA). All AAs consisted of whole counties and met the requirements of the regulation. The areas reflected the different trade areas that the bank's branches could service and did not arbitrarily exclude any low- or moderate-income (LMI) areas.

HNB continued to maintain its private banking presence in Florida with one retail branch office. On September 29, 2017, HNB closed the one branch location in Ohio County, West Virginia. This resulted in the bank no longer being in two or more states of an MMSA. Normally, analysis of 2018-2019 data for the remaining county, Belmont County, Ohio, would have been included as a limited-scope analysis area in the state of Ohio analysis. The OCC opted to continue the evaluation of Belmont County, Ohio as an MMSA to continue the full-scope analysis for the full four-year period. Data from Ohio County, West Virginia was not included in the analysis after the branch closure. On June 14, 2019, HNB exited

the state of Wisconsin by selling all branches located in Wisconsin to Associated Banc-Corp, headquartered in Green Bay, Wisconsin. Refer to the Description of Institutions section in the respective state narratives for details.

HNB provides full-service commercial, small business, and consumer banking services; mortgage banking services; treasury management and foreign exchange services; equipment leasing; wealth and investment management services; trust services; brokerage services; customized insurance brokerage and service programs.

No known legal, financial, or other factors are present to impede the bank's ability to help meet the credit needs of its AAs.

HNB received an Outstanding CRA rating at the previous CRA evaluation dated May 9, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the Large Institution Lending, Investment, and Service Tests. The evaluation period was January 1, 2016 to December 31, 2019.

In evaluating the bank's lending performance, the OCC reviewed home mortgage loan products reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses and small loans to farms reported under CRA, Community Development (CD) loans; qualified investments; and CD and retail services. Examiners did not consider consumer loans in this evaluation, as consumer lending did not constitute a substantial majority of the bank's business and management did not request consideration. Qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States occurred after December 31, 2019, which the OCC will consider in the subsequent evaluation.

HNB offers and originates farm loans as a courtesy to customers but farm lending was not considered a primary product. In most markets, HNB made few, if any, small loans to farms. The OCC determined that 20 loans made within an AA was sufficient for analysis purposes. Due to the limited number of farms in LMI geographies, small farm lending had no material impact on the Lending Test conclusion. If examiners included an analysis of these loans in a rating area, they noted it in the narrative for the applicable rating area.

The evaluation covers changes in demographics between the 2010 U.S. Census data and the 2015 American Community Survey (ACS) and requires the organization and analysis of data based on the applicable census period. The ACS changes became effective on January 1, 2017. The changes instituted by the ACS updated income, population, and housing information and resulted in changes to the income designations of some geographies. Examiners completed two analyses of the geographic and borrower income distribution criteria for each AA, one with 2016 stand-alone data and one with 2017 – 2019 combined data. When arriving at overall conclusions, examiners placed more weight on the bank's lending performance during the 2017 – 2019 period as it represented a longer period of performance, more recent performance, a larger volume of lending, and the combined post-merger institution. Examiners discuss the performance from 2016 in the applicable narrative sections of the evaluation and

compare it with the performance from 2017 – 2019. Appendix D includes only data from 2017 – 2019 for the respective MMSA and State rating areas.

MSA boundary changes introduced in September 2018, effective January 1, 2019, by the Office of Management and Budget (OMB) resulted in additional analysis for two limited-scope AAs under the lending test in the state of Michigan. For both the geographic and borrower income distribution criteria, those AAs affected received separate analyses of 2016 data, 2017 through 2018 data, and 2019 data. See the “Description of Institution’s Operations” section in the state of Michigan rating section for details on those areas affected by these changes.

HNB did not have any branches in Illinois or Wisconsin prior to its merger with FirstMerit in August 2016. In addition, HNB sold all Wisconsin branches and exited Wisconsin in June 2019. Examiners did not analyze 2016 data in Illinois and Wisconsin nor 2019 data in Wisconsin, as there was not enough data to conduct a meaningful analysis. As a result, appendix D includes only data from 2017-2018 for the state of Wisconsin.

Examiners aggregated home mortgage loan data for all home loan types. When differences existed in performance between loan products in a specific AA, examiners determined the overall conclusion by weighting the products based on the loan mix by number of loans over the evaluation period. Weighting by number of loans gives consideration for each lending decision regardless of the loan’s dollar amount. Weightings are described within the narrative comments of each rating area.

The loan distribution analyses compared HMDA loans and loans to small businesses and small farms to demographic and aggregate data under the applicable lending test components. Aggregate data illustrates the bank’s performance relative to other lenders in the AA and provides context as to reasonableness of the bank’s performance. Examiners placed equal emphasis on demographic and aggregate performance for 2016 data. For 2017 – 2019 lending performance (2017-2018 for the state of Wisconsin), examiners placed more emphasis on borrower and geographic distributions than on aggregate performance. Borrower and geographic comparators included data from multiple years where aggregate comparators included only data from 2018, which was the most current information available at the time of the evaluation.

Examiners gave slightly more emphasis to the borrower distribution component of the Lending Test throughout all rating areas due to larger percentages of LMI borrowers compared to LMI geographies. When evaluating the distribution of loans to geographies with different income levels, examiners gave more weight to the bank’s performance in moderate-income geographies as this category had more lending opportunities (e.g., higher percentage of businesses or owner-occupied housing units). For borrower distribution, examiners placed more emphasis on the income category with the higher percentages of families. Examiners also considered the impact of poverty levels and housing costs on home affordability, as described within the narrative comments of each rating area, as applicable.

The analysis considered the number and dollar volume of CD loans with emphasis placed on those loans that were particularly innovative or complex or responsive to the AAs needs. CD lending in an AA may affect the Lending Test rating positively, neutrally, or negatively, which examiners describe in the narrative comments. To provide perspective regarding the relative level of CD lending, examiners allocated a portion of the bank’s tier 1 capital to each AA based on its pro rata share of deposits as a means of comparative analysis.

HNB offers several flexible loan products that address the needs of LMI borrowers, LMI geographies and small businesses. These include Federal Housing Administration (FHA), Veterans' Administration (VA), and Federal National Mortgage Association (FNMA) loans, adjustable term loans, and special state bond loan programs. HNB also originated residential real estate loans with higher than typical risk for retention within the bank's portfolio due to terms not immediately acceptable to the secondary market. The following products and programs complement the bank's existing suite of products which examiners considered in the "Product Innovation and Flexibility" section for those AAs that had significant activity.

HNB developed the "*Community Access Mortgage*" (CAM), an innovative/flexible portfolio mortgage product to help consumers purchase or refinance primary residences located in LMI geographies. The CAM program allows a minimum borrower credit score of 620 for a one-unit principal residence; the maximum loan-to-value (LTV) for purchase and limited cash-out refinance was 97 percent, with a maximum combined LTV (first and second mortgage combined) of 105 percent. The CAM product requires no private mortgage insurance and the bank does not charge a higher interest rate for lower credit scores. "*HomeTown Mortgage*," a version of CAM, was also available in partnership with nonprofits to find and qualify prospects in the local communities that the nonprofits serve. *HomeTown Mortgage* allows credit scores as low as 580 with financial education for the borrower.

The bank offered "*Debt Manager*" programs with no minimum loan amount (micro loans), at below market interest rates to work with borrowers whose credit scores are reduced. HNB designed the *Debt Manager* loan program as an unsecured loan to help customers establish a plan to payoff existing credit card balances. The program's fixed rate and fixed term make the loan product a tool to avoid rate increases and quickly reduce credit card balances; customers must close any credit card the bank pays off with this loan. The unsecured loan product offers a solution for customers who do not own a home or whose home values do not provide sufficient equity to support an equity consolidation loan.

In response to community needs identified by nonprofit organizations and community partners in various communities, HNB designed its unsecured home improvement loan product to address gaps for consumers who own homes in LMI geographies with property values that do not support conforming home equity loans. In addition, HNB reduced barriers to homeownership and enabled existing homeowners to refinance owner-occupied homes in LMI geographies by waiving closing costs across the bank's footprint.

The analysis considered the volume of qualified investments made during the current evaluation period and qualified investments made prior to the current evaluation period for which amounts are still outstanding. Particularly innovative or complex investments, or those particularly responsive to the AA's needs, received more emphasis. To provide perspective regarding the relative level of CD lending, examiners allocated a portion of the bank's tier 1 capital to each AA based on its pro rata share of deposits as a means of comparative analysis.

HNB also offered equity equivalents (EQ2s) during the review period. The bank often took the lead financial investor role to create the EQ2 and invited other financial institution participants to invest and spread the risk. An EQ2 provides a form of equity or capital that usually must be repaid in 10 years, although the equity had a "rolling" term, meaning an indeterminate maturity. The EQ2 functioned like equity for nonprofit Community Development Financial Institutions (CDFI). The EQ2 was a capital product for CDFIs and their investors that allows the CDFI to strengthen their capital structures, leverage additional debt capital, and as a result, increase lending and investing in economically disadvantaged communities.

Primary consideration was given to the bank's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. The analysis compared the percentage of branches located in LMI geographies to the percentage of the population residing in LMI geographies. The analysis also considered any differences in branch hours and services in LMI geographies compared to branch hours and services in middle-and-upper income geographies.

When the bank opened or closed branches within low-, moderate-, middle-, or upper-income geographies of an AA, the analysis evaluated the overall impact of the change based on the geography income level as of the date of the change. If the bank neither opened nor closed branches in an AA, the service test conclusions did not include this performance element.

The bank provided banking services through other alternative distribution systems (ADS) including full-service ATMs, telephone banking, online banking, mobile banking, and Zelle. Examiners did not place significant weight on these systems, as there was no data concerning the effectiveness of these systems in targeting LMI geographies and individuals.

Examiners evaluated the bank's record of providing CD services in the AAs that received full-scope reviews. Examiners gave primary consideration to CD services found particularly innovative or responsive to the needs of the community.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is a blend of the MMSA and state ratings. The states of Ohio and Michigan carried the greatest weights in the overall conclusions. These combined rated areas accounted for 72.3 percent of the bank's HMDA- and CRA-reportable loans (48.3 percent and 24.0, respectively), 77.8 percent of total deposits (57.7 percent and 20.0, respectively), and 74.0 percent of the branch network (42.5 percent and 31.6 percent, respectively).

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) in determining a national bank's 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 Consumer Financial Protection Bureau, as applicable.

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

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

Multistate Metropolitan Statistical Area Ratings

Cincinnati OH-KY-IN (Cincinnati) MMSA

CRA rating for the Cincinnati 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:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses was adequate and overall borrower distribution was good.
- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.
- CD services were effective and responsive in addressing community needs. The bank provided a significant level of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Cincinnati MMSA

HNB delineated seven of the 15 counties within the Cincinnati MMSA as an AA. Refer to appendix A for a list of counties reviewed.

Based on June 30, 2019 Federal Deposit Insurance Corporation (FDIC) summary of deposit information, HNB had \$3.4 billion in deposits in the Cincinnati MMSA AA, representing 4.1 percent of overall bank deposits. The bank originated and purchased \$3.0 billion in loans, or 8.2 percent of total bank loan originations and purchases, during the evaluation period. The bank's primary loan products in the Cincinnati MMSA AA were home mortgage loans and small loans to businesses.

HNB operated 36 branches, representing 3.9 percent of the bank's branches, and 46 ATMs, of which 40 were deposit-taking. HNB ranked fifth out of 53 depository institutions with a 5.7 percent deposit market share. The top three banks within the MMSA in terms of deposit market share were U.S. Bank, N.A. with a 53.2 percent market share, Fifth Third Bank with a 26.9 percent market share, and PNC Bank, N.A. with a 5.1 percent market share.

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

The following table provides a summary of the demographics, including housing and business information for the Cincinnati MMSA AA.

Table A – Demographic Information of the Assessment Area Assessment Area: Cincinnati MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	463	13.6	21.0	36.7	26.8	1.9
Population by Geography	1,976,032	8.7	17.7	39.0	33.4	1.3
Housing Units by Geography	847,321	10.7	19.1	39.3	30.3	0.5
Owner-Occupied Units by Geography	500,413	4.2	14.3	42.3	39.2	0.1
Occupied Rental Units by Geography	261,527	18.9	26.9	35.4	17.7	1.1
Vacant Units by Geography	85,381	23.8	23.6	34.1	17.2	1.3
Businesses by Geography	131,182	7.0	17.7	35.7	38.6	1.0
Farms by Geography	3,686	3.6	12.8	48.6	34.9	0.2
Family Distribution by Income Level	495,929	21.9	16.4	19.8	42.0	0.0
Household Distribution by Income Level	761,940	25.2	15.2	17.0	42.6	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$69,949	Median Housing Value			\$158,731
			Median Gross Rent			\$768
			Families Below Poverty Level			10.3%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Information from the 2019 Moody's Analytics report indicated the Cincinnati economy has been very prosperous and will remain one of Ohio's strongest economies due to high employment gains, mainly in white-collar services and healthcare, as well as aerospace manufacturing. The AA's strengths included a highly educated and skilled workforce, a strong freight shipping and logistics network, and the presence of multinational firms, the low cost of living and affordable housing, and an expanding commercial aviation cluster. The favorable business environment will help the AA continue to outpace the broader Midwest but will still trail the United States (U.S.) relative to job growth in the long term. The MSA benefits from strength in professional and technical services, real estate, health, and manufacturing. Demand for medical care is rising and several multimillion-dollar hospital construction projects are underway. The AA is home to dozens of corporate headquarters that provide high-paying jobs. Aerospace manufacturing recently added hundreds of new employees. However, many of these jobs are not accessible to LMI residents in urban neighborhoods. Public transportation is limited and unreliable, both in the city and in the rural areas, which limits access to jobs.

Based on information in the above table, low-income families earned less than \$34,975 and moderate-income families earned less than \$55,959. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$874 for low-income borrowers and \$1,399 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional

monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be \$852.

The Cincinnati MMSA AA's unemployment rate declined from 4.4 percent in 2016 to 3.6 percent in 2019. Top employers are in the Manufacturing, Professional and Business Services, Education & Health Services, and Government. Manufacturing, Financial Centers and Medical Centers serve as the main growth drivers of the economy.

The analysis considered information provided by three nonprofit community contacts that serve the Cincinnati MMSA AA. One community contact represented affordable housing and fair housing policies in LMI areas. The other contacts represent economic development with a goal of building sustainable communities in LMI areas including encouraging and enabling home ownership.

The long-standing source of living wage employment in the six county Cincinnati region, especially for people without high school diplomas or college degrees, was once dominated by manufacturing industries with several located in Hamilton County and the City of Cincinnati. These industries decreased over the decades, replaced by lower paying warehouse and service industry jobs. Declining manufacturing jobs combined with the mortgage crisis and loss of affordable housing due to gentrification has led to the displacement of LMI populations.

Information provided by three community contact interviews, two organizations providing assistance for first-time homebuyers and one focusing on economic development, indicated the most pressing needs of the area include:

- Small dollar loans for home repair or rehabilitation, auto repair, emergencies, etc.
- Financial education and first-time homebuyer counseling.
- Affordable entry-level transaction accounts, credit repair products, secured credit cards, and second chance checking accounts.
- Tax preparation assistance for LMI individuals and families.

Scope of Evaluation in Cincinnati MMSA

The rating for the Cincinnati MMSA AA is based on a full-scope evaluation of the bank's performance in the AA. Examiners placed more emphasis on home mortgage loans versus small loans to businesses and small loans to farms in arriving at the overall conclusion. HMDA loans represented the majority of HNB's lending in this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CINCINNATI MMSA

LENDING TEST

The bank's performance under the Lending Test in the Cincinnati MMSA AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Cincinnati MMSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans 2016 - 2019					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Cincinnati MMSA	13,233	4,892	62	27	18,214

Dollar Volume of Loans 2016 - 2019 (000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Cincinnati MMSA	\$2,439,823	\$559,972	\$3,982	\$165,643	\$3,169,420

HNB ranked fifth in deposits out of 53 depository institutions (top 10 percent), with a 5.7 percent market share in the AA. In overall HMDA lending, HNB ranked second out of 556 lenders with a 6.0 percent market share (top 1 percent). The first and third top home lenders in this market were U.S. Bank, N.A. with a 6.1 percent market share and Union Savings Bank with a 5.3 percent market share.

For small loans to businesses, HNB ranked ninth out of 126 lenders (top 8 percent) with a market share of 4.1 percent. The top three lenders were American Express National Bank with a market share of 20.1 percent, U.S. Bank, N.A. with a market share of 14.2 percent, and Chase Bank USA, N.A. with a 11.0 percent market share. All three of these lenders issue significant numbers of small business credit cards as a primary business.

For small loans to farms, HNB ranked fourth out of 19 lenders (top 22 percent), with a market share of 10.6 percent. The top three lenders were U.S. Bank, N.A. with a market share of 29.5 percent, John Deere Financial, F.S.B. with a market share of 18.9 percent, and Chase Bank USA, N.A. with a 13.2 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the “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.

The geographic distribution of home mortgage loans was adequate.

- For 2017 – 2019, the proportion of home mortgage loans in low-income geographies was below the proportion of owner-occupied housing units (OOU) but approximated the aggregate distribution of loans in those geographies.
- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies was below both the proportion of OOU and the aggregate distribution of loans in those geographies.
- For 2016, the bank’s geographic distribution of home mortgage loans was consistent with the bank’s geographic distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

Refer to Table Q in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

- For 2017 – 2019, the proportion of small loans to businesses in both low- and moderate-income geographies exceeded both the proportion of small businesses located in those geographies and the aggregate distribution of loans to small businesses.
- For 2016, the bank’s geographic distribution of small loans to businesses was consistent with the bank’s geographic distribution of small loans to businesses for 2017 – 2019.

Small Loans to Farms

Refer to Table S in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was good considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, HNB did not make any small loans to farms in low-income geographies. The proportion of small loans to farms in moderate-income geographies exceeded both the proportion of small farms located in those geographies and the aggregate distribution of loans to small farms in those geographies.
- For 2016, the bank did not make enough small loans to farms to complete a meaningful analysis.

Lending Gap Analysis

The OCC analyzed HNB’s geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but approximated the aggregate distribution of all reporting lenders in the AA.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.
- For 2016, the bank’s borrower distribution of home mortgage loans was consistent with the bank’s borrower distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

- For 2017 – 2019, the percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of small businesses in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank’s borrower distribution of small loans to businesses with revenues of \$1 million or less was consistent with the bank’s distribution of small loans to businesses for 2017 – 2019.

Small Loans to Farms

Refer to Table T in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was good considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, the percentage of small loans to farms with revenues of \$1 million or less was below the percentage of small farms in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank did not make enough small loans to farms to complete a meaningful analysis.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Cincinnati MMSA AA was excellent. HNB made 27 loans totaling \$165.6 million, which represented 36.4 percent of allocated tier 1 capital. The bank made significant use of innovative and/or complex CD loans, involving many complex projects where the bank frequently acted in a leadership role. The bank made 15 loans totaling \$89.1 million to revitalize, stabilize, and develop LMI neighborhoods. These loans supported developing or improving new retail centers, restaurants, medical and mental health facilities, student housing and market rate apartment buildings.

The bank made four loans totaling \$16.7 million that created 324 units of affordable housing, also a critical need of the AA. Additionally, the bank extended eight loans totaling \$59.9 million to organizations providing community services to LMI individuals.

Examples of CD loans in the AA include:

- HNB made a complex construction loan of \$30 million to develop an office building in a moderate-income geography in Cincinnati's Madisonville neighborhood. The property was pre-leased to a leading clinical contract research organization focused on providing outsourced clinical development services. The company estimated that this expansion of its existing campus would result in 650 new jobs, including clinical, laboratory and administrative positions. In addition to the research organization's space, there were three retail/restaurant locations to create additional jobs in service industries.
- HNB loaned \$28.8 million to refinance existing debt to a skilled nursing facility with six locations in the AA whose overall payor mix includes 56.8 percent Medicaid. The Cincinnati facilities house 492 beds. HNB assumed a leadership role as the syndication agent for this complex project.
- HNB loaned \$19.5 million in a construction to mini-permanent loan to develop 204 multi-family units in Cincinnati's Silverton neighborhood, which was in a designated CRA area in the city of Silverton's Comprehensive Plan. In addition to the affordable housing units, this mixed-use development consisted of retail, restaurant, and office space that will revitalize and stabilize the adjacent LMI areas by attracting businesses and residents and creating jobs.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Under the bank's *Community Access Mortgage* program, the bank funded two first-time homebuyer mortgages totaling \$259,000. Under the *HomeTown Mortgage* loan program, the bank funded 116 first-time homebuyer mortgages totaling \$12.2 million. The bank also made 83 unsecured home improvement loans totaling \$796,000 and 498 loans under the *Debt Manager* program totaling \$6.3 million.

INVESTMENT TEST

The institution's performance under the Investment Test in the Cincinnati MMSA AA is Outstanding.

Based on a full-scope review, the institution's performance in the Cincinnati MSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Cincinnati MMSA	17	4,930	105	39,119	122	100.0	44,049	100.0	13	5,269

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

** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 9.7 percent of tier 1 capital allocated to the AA. This did not include unfunded commitments, which was an additional 1.2 percent of allocated capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution made extensive use of innovative and/or complex investments to support CD initiatives. The bank made 20 complex Low-Income Housing Tax Credit (LIHTC) syndications totaling \$27.5 million where the bank often acted in a leadership role with participation from federal, state, local housing agencies, real estate developers, and other financial institutions. In addition, the bank provided 79 grants totaling \$1.1 million to a variety of organizations that primarily supported affordable housing and community services.

Examples of CD investments in the AA include:

- Huntington Community Development Corporation (HCDC) invested \$5.2 million to purchase a 99.0 percent investor member interest in an historic tax credit partnership. The project involved rehabilitation of a vacant school located in a CRA-eligible geography just north of Cincinnati's central business district. The project converted 150 existing classrooms into 142 one- and two-bedroom naturally occurring affordable apartments.
- HNB invested a total of \$5.5 million in a 65-unit LIHTC project to provide affordable housing in the Cincinnati MMSA AA.
- HCDC invested \$2 million with a certified CDFI nonprofit to provide financing for affordable housing and community facilities within the Cincinnati MMSA AA.

SERVICE TEST

The institution's performance under the Service Test in the Cincinnati MMSA AA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Cincinnati MMSA AA was good.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Cincinnati MMSA	100.0	36	100.0	0.0	27.8	38.9	33.3	8.7	17.7	39.0	33.4

* May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank had no branches in low-income geographies. HNB's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 46 ATMs in the AA, of which 40 were deposit-taking.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Cincinnati MMSA	2	4	0	0	-1	-1

The institution's opening and closing of branches had not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed four branches, one of which was in a moderate-income geography, and opened two branches, one of which was also in a moderate-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of the AA, particularly LMI geographies and/or individuals. HNB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm, and Saturday from 9:00 am to 12:00 pm. Of the 36 branches, 34 have drive-through facilities open the same hours as the lobby.

Community Development Services

The institution provided a significant level of CD services.

Bank employees provided financial or job-specific expertise and/or technical assistance for 551 CD service activities to 39 organizations logging 2,421 qualified hours. Over 1,850 hours of assistance were to organizations that provide community services to LMI individuals and families, including first-time homebuyer education and financial literacy education. Employees provided 533 hours serving on the boards of directors or loan committees for eight nonprofit organizations. The bank's assistance was responsive to identified needs in the AA, particularly financial education and homebuyer counseling and education for LMI individuals and families.

The following are examples of CD services provided in this AA:

- One HNB employee served as a board member and chair of the audit committee for a local chapter of a nonprofit organization that helps women become financially self-sufficient and enter the workforce. The organization trains individuals how to complete job applications, interview successfully, and maintain a job. Ninety-two percent of the women served were LMI, unemployed, or receiving public assistance.
- One HNB employee served as a board member for a small business administration loan provider in Hamilton County, Ohio. The organization also qualifies as a Certified Development Company

that promotes economic development by providing financing and loans to small business in the county.

- One hundred fifty-four HNB employees taught 884 hours of financial literacy classes in 10 schools located in low-income geographies throughout the Cincinnati MMSA AA. The classes took the form of an interactive game that taught fifth grade students ways to budget, save, handle unexpected expenses, discern the difference between low- versus high-risk ventures, and understand financial vocabulary words. The majority of the student enrollment in the schools was eligible to receive free and reduced lunches.

Weirton-Steubenville, WV-OH (Weirton) MMSA

CRA rating for the Weirton MMSA²: 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:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses and overall borrower distribution were good.
- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.
- CD services were effective and responsive in addressing community needs. The bank provided a significant level of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Weirton MMSA

HNB delineated two of the three counties within the Weirton MMSA as an AA. Refer to appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, HNB had \$346 million in deposits in the Weirton MMSA AA, representing 0.4 percent of overall bank deposits. The bank originated and purchased \$91.3 million in loans, or 0.3 percent of total bank loan originations and purchases during the evaluation period. The bank's primary loan products in the Weirton MMSA AA were home mortgage loans and small loans to businesses.

HNB operated seven branches, representing 0.8 percent of the bank's branches, and eight ATMs, of which seven were deposit-taking. HNB ranked first out of 12 depository institutions with a 24.2 percent deposit market share. The second and third banks within the MMSA in terms of deposits were Wesbanco Bank, Inc. with a 16.1 percent market share and PNC Bank, N.A. with a 14.0 percent market share.

The following table provides a summary of the demographics, including housing and business information for the Weirton MMSA AA.

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

Table A – Demographic Information of the Assessment Area Assessment Area: Weirton MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	6.5	16.1	64.5	12.9	0.0
Population by Geography	98,254	2.3	13.5	74.0	10.2	0.0
Housing Units by Geography	47,058	2.6	13.2	74.1	10.0	0.0
Owner-Occupied Units by Geography	29,267	1.7	8.4	77.9	12.0	0.0
Occupied Rental Units by Geography	11,585	3.8	21.2	68.3	6.6	0.0
Vacant Units by Geography	6,206	4.9	21.3	67.1	6.7	0.0
Businesses by Geography	4,851	1.4	15.0	69.9	13.7	0.0
Farms by Geography	154	0.6	5.8	83.8	9.7	0.0
Family Distribution by Income Level	26,497	19.4	19.4	21.4	39.8	0.0
Household Distribution by Income Level	40,852	24.5	15.9	19.0	40.6	0.0
Median Family Income MSA - 48260 Weirton-Steubenville, WV-OH MSA		\$52,770	Median Housing Value			\$85,139
			Median Gross Rent			\$598
			Families Below Poverty Level			12.4%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Information from the October 2019 Moody's Analytics report indicated recent investments in the U.S. steel industry caused the Weirton economy to experience stronger than expected job growth that benefitted consumer industries. Additionally, a large gas compression company recently located its U.S. headquarters in the area. The Moody's analyst expected these expansions to add needed mid- and high-wage jobs to support consumer industries and housing spends. The AA's below-average business and living costs plus a concentration of health care facilities comprised good reasons to locate to the area. However, the area's long-term forecasts remained stagnant. Weirton represented one of West Virginia's poorest economies due to persistent out-migration (more working people moving out of an area than are moving in), an under-skilled workforce, a below-average standard of living, and above-average employment volatility. Moody's indicated the 50-year decline in manufacturing as the major reason for Weirton's population decline. The AA's population decline in 2018 represented one of the fastest in the U.S. Despite an aging remaining population, the analyst forecasted that the overall low wages offered by the healthcare facilities, the area's largest employing industry, will cause working age families to leave the area.

The Federal Housing Finance Agency reported that houses in the area became more affordable and could now be undervalued. House appreciation remained below the rest of West Virginia and much below the U.S. average. New construction was stagnant with significant vacant existing home stock.

Based on information in the above table, low-income families earned less than \$26,385 and moderate-income families earned less than \$42,216. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$660 for low-income borrowers

and \$1,055 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be \$457.

According to the October 2019 Moody's Analytics report, the Weirton MMSA AA's unemployment rate declined from 7.8 percent in 2016 to 5.4 percent in 2019 but remained above both the 2019 West Virginia and U.S. averages of 4.9 and 3.6 percent, respectively. Top employers were in Government and Education, Healthcare Services, Casino/Racetrack, and the Manufacturing and Processing of Metals.

Information provided by two nonprofit community contacts that supported economic development in the Weirton MMSA AA, one organization supporting brownfield remediation and development, the other providing services focused on health, housing, youth, transportation, emergency assistance, and income management indicate that the most pressing needs of the Weirton MMSA AA included:

- Affordable housing development.
- Remediation of the brownfields left by mining operations.

Scope of Evaluation in Weirton MMSA

The rating for the Weirton MMSA AA is based on a full-scope evaluation of the bank's performance in the AA. Examiners placed more emphasis on home mortgage loans versus small loans to businesses arriving at the overall conclusion. HMDA loans represented the majority of HNB's lending in this AA. HNB did not originate enough farm loans in the Weirton MMSA AA to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEIRTON MMSA

LENDING TEST

The bank's performance under the Lending Test in the Weirton MMSA AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Weirton MMSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans 2016 – 2019					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Weirton MMSA	967	225	3	3	1,198

Dollar Volume of Loans 2016 - 2019 (000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Weirton MMSA	\$74,063	\$17,163	\$95	\$15,145	\$106,466

HNB ranked first in deposits out of 12 depository institutions (top 9 percent), with a 24.2 percent market share in the Weirton MMSA AA. In overall HMDA lending, HNB ranked first out of 126 lenders (top 1 percent), with a 16.7 percent market share. The second and third top lenders in this market were Hancock County Savings Bank, FSB with a 12.9 percent market share and U.S. Bank, N.A. with a 10.1 percent market share.

For small loans to businesses, HNB ranked seventh out of 55 lenders (top 13 percent) with a market share of 6.0 percent. The top three lenders were Synchrony Bank with a market share of 14.7 percent, American Express National Bank with a market share of 10.8 percent, and PNC Bank, N.A. with a market share of 10.7 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the “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.

The geographic distribution of home mortgage loans was good.

- For 2017 – 2019, the proportion of home mortgage loans in both low- and moderate-income geographies was below the proportion of OOUs but approximated the aggregate distribution of loans in those geographies.
- For 2016, the bank’s geographic distribution of home mortgage loans was consistent with the bank’s geographic distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

Refer to Table Q in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was adequate.

- For 2017 – 2019, the proportion of small loans to businesses in low-income geographies was below the proportion of small businesses located in those geographies but exceeded the aggregate distribution of loans to small businesses.
- For 2017 – 2019, the proportion of small loans to businesses in moderate-income geographies was below the proportion of small businesses located in those geographies but well below the aggregate distribution of loans to small businesses.

- For 2016, the bank's geographic distribution of small loans to businesses was stronger than the bank's geographic distribution of small loans to businesses for 2017 – 2019 due to better distribution in moderate-income geographies.

Lending Gap Analysis

The OCC analyzed HNB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the "MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.
- For 2016, the bank's borrower distribution of home mortgage loans was weaker than the bank's borrower distribution of home mortgage loans for 2017 – 2019 due to poorer distribution to low-income borrowers.

Small Loans to Businesses

Refer to Table R in the "MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

- For 2017 – 2019, the percentage of small loans to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank's borrower distribution of small loans to businesses with revenues of \$1 million or less was consistent with the bank's distribution of small loans to businesses for 2017 – 2019.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Weirton MMSA AA was excellent. HNB made three loans in its AA for a total of \$15.1 million, which represented 35.0 percent of tier 1 capital allocated to the AA. The bank made significant use of innovative and/or complex CD loans, involving many complex projects where the bank frequently acted in a leadership role. The bank made two loans totaling \$14.0 million to revitalize/stabilize and develop LMI neighborhoods. The bank made one loan totaling \$1.1 million for the purpose of affordable housing.

Examples of CD loans in the AA include:

- HNB loaned \$11.0 million to construct a 113-room hotel located in a low-income geography and convert the current hotel into student housing for a local university. The project was in a designated Community Reinvestment Target Area, had a tax increment financing property tax abatement, and was expected to create permanent jobs as well as affordable housing for students. This lending was complex as it involved both the construction/permanent loan and mezzanine financing.
- HNB loaned \$1.1 million to an organization that constructed 43 units of affordable housing in a LIHTC project in the AA.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs.

Under the bank's *HomeTown Mortgage* loan program, the bank funded one first-time homebuyer mortgage totaling \$100,000. The bank also made 15 unsecured home improvement loans totaling \$141,000 and 153 loans under the *Debt Manager* program totaling \$1.8 million.

INVESTMENT TEST

The institution's performance under the Investment Test in the Weirton MMSA AA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Weirton MMSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Weirton MMSA	5	41	13	4,185	18	100.0	4,226	100.0	4	61

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

** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 9.8 percent of tier 1 capital allocated to the AA.

The investments and grants reflected excellent responsiveness to needs identified in the AA, including affordable housing, community services, and revitalization/stabilization of LMI individuals and geographies. The bank made five LIHTC project investments for \$2.9 million. HNB invested \$1.2 million to a local school district for capital improvements. The majority of HNB's current period grants and donations of \$33,500 were to community service organizations that provided services to LMI individuals.

Examples of CD investments in the AA include:

- HCDC invested \$2.8 million and served as the leader for an affordable housing investment. The project rehabilitated a 61-unit senior housing building in a moderate-income geography. The property held a Section 8 Housing Assistance Payment contract with the Department of Housing and Urban Development that covered 60 of the 61 units.
- HNB invested \$1.2 million for a local school district improvement bond to cover various capital projects throughout the school district. Over 59 percent of the district's students were eligible to receive free or reduced lunches.

SERVICE TEST

The institution's performance under the Service Test in the Weirton MMSA AA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Weirton MMSA AA was good.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Weirton MMSA	100.0	7	100.0	0.0	14.3	71.4	14.3	2.3	13.5	74.0	10.2

* May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank had no branches in low-income geographies. HNB's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had eight ATMs in the AA, of which seven were deposit-taking.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Weirton MMSA	0	3	0	0	-3	0

The institution's opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed three branches, none of which were in a low- or moderate-income geography. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconvenienced the various portions of its AA(s), particularly low- and moderate-income geographies and/or individuals. HNB maintained standard business hours and offered traditional banking products and services at six branch locations in the AA. The seventh branch consisted only of a drive-through facility. Branches were open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm, and Saturday from 9:00 am to 12:00 pm. The six branches with lobbies had drive-through facilities that operated with the same hours.

Community Development Services

The institution provided a significant level of CD services.

Employees provided financial or job-specific expertise and/or technical assistance for 54 CD service activities logging 310 qualified hours, to 10 organizations within this AA. The majority of the bank's assistance, 205 hours, was to organizations that provided community services to LMI individuals and families, including first time homebuyer education, homebuyer counseling, and financial literacy education. Employees provided 105 hours serving on the board of directors or committee for five nonprofit organizations.

The following are examples of CD services provided in this AA:

- One HNB employee served as a board member for a local revitalization nonprofit that rehabilitates owner-occupied housing, homeless and domestic violence shelters, and parks and recreation space located in LMI areas; and provided first-time homebuyer down payment assistance and tenant rental assistance for LMI residents.
- Three HNB employees used the FDIC Money Smart curriculum to teach senior citizens how to prevent financial exploitation, avoid fraud and identity theft, and plan for a secure financial future. The classes were held at a community center in a women's residence housing eight women in transition from homelessness, mental health issues, substance abuse issues, domestic violence, and elder abuse. All residents were LMI individuals.

Wheeling WV-OH (Wheeling) MMSA

CRA rating for the Wheeling MMSA³: 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:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution and borrower distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses were excellent.
- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

Description of Institution's Operations in Wheeling MMSA

HNB delineated two of the three counties within the Wheeling MMSA as an AA. On September 29, 2017, HNB closed the one branch in Ohio County, West Virginia. This resulted in the bank no longer being in two or more states of an MMSA. Normally, analysis of 2018-2019 data for the remaining county, Belmont County, Ohio would have been included as a limited-scope analysis area in the state of Ohio analysis. The OCC opted to continue the evaluation of Belmont County, Ohio as an MMSA to continue the full-scope analysis for the full four-year period. Data from Ohio County, West Virginia was not included in the analysis after the branch closure. Refer to appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, HNB had \$233.3 million in deposits in the Wheeling MMSA AA, representing 0.3 percent of overall bank deposits. The bank originated and purchased \$7.1 million in loans, or 0.2 percent of total bank loan originations and purchases during the evaluation period. The bank's primary loan products in the Wheeling MMSA AA were home mortgage loans and small loans to businesses.

HNB operated five branches, representing 0.6 percent of the bank's branches, and five ATMs, all of which were deposit-taking. HNB ranked fourth out of 15 depository institutions with a 7.1 percent deposit market share. The top three banks within the MMSA in terms of deposit market share are Wesbanco Bank, Inc. with a 37.6 percent market share, Unified Bank with a 10.0 percent market share, and Belmont Savings Bank with an 8.7 percent market share.

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

The following table provides a summary of the demographics, including housing and business information for the Wheeling MMSA AA.

Table A – Demographic Information of the Assessment Area Assessment Area: Wheeling MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	38	0.0	31.6	50.0	18.4	0.0
Population by Geography	113,197	0.0	18.4	60.3	21.3	0.0
Housing Units by Geography	53,317	0.0	21.0	60.6	18.4	0.0
Owner-Occupied Units by Geography	33,302	0.0	15.1	64.2	20.7	0.0
Occupied Rental Units by Geography	13,041	0.0	31.5	52.9	15.6	0.0
Vacant Units by Geography	6,974	0.0	29.4	58.2	12.4	0.0
Businesses by Geography	7,175	0.0	24.6	54.3	21.1	0.0
Farms by Geography	222	0.0	9.9	70.7	19.4	0.0
Family Distribution by Income Level	28,612	18.8	19.3	20.5	41.4	0.0
Household Distribution by Income Level	46,343	24.9	16.5	16.9	41.7	0.0
Median Family Income MSA - 48540 Wheeling, WV-OH MSA		\$56,853	Median Housing Value			\$98,037
			Median Gross Rent			\$549
			Families Below Poverty Level			9.8%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Information from the October 2019 Moody's Analytics report indicated the Wheeling MMSA AA economy has been growing faster than regional peer MMSAs. The AA ranks among the 10 fastest growing metropolitan areas nationally. Mining and construction expanded rapidly in 2019 and dominated local hiring. The economy's strengths include abundant natural energy resources, high housing affordability, and below-average business and living costs. Moody's expects the Wheeling MMSA AA economy's net hiring in goods-producing industries (mining and natural gas production) will slow from the 2019 pace, but still exceed the national average in the near term. Moody's also expects mining and construction to remain a key source of jobs due to West Virginia's "Roads to Prosperity" plan and the build-out of natural gas production, including construction of a \$5 billion pipeline. West Virginia also spent nearly \$100 million to update state roads since October 2017, funding construction jobs.

Moody's analysts also expect rising international demand for coal to contribute to the Wheeling MMSA AA's economic growth, lifting the price of coal and prompting firms to reopen currently idled mines. They expect the positive effect from the growth in energy and construction industries will prompt growth in other businesses, including new restaurants and entertainment venues, and professional and business services.

Based on information in the above table, low-income families earned less than \$28,427 and moderate-income families earned less than \$45,482. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's

income. This calculated to a maximum monthly mortgage payment of \$711 for low-income borrowers and \$1,137 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be \$526.

According to Moody's Analytics, the Wheeling MMSA AA's unemployment rate declined from 7.0 percent in 2016 to 5.0 percent in 2019. Top employers are in Local Government, Healthcare, State Government, Energy, Manufacturing, and Education. The growth in jobs indicates that the Wheeling MMSA AA's previous decades of population losses should slow and possibly increase. The energy industry is known for boom and bust cycles. Further, the resident population is rapidly aging. Unless the MMSA attracts new industries with less cyclical volatility, in the long-term, low educational attainment and further rapid population losses could cause Wheeling to underperform the region and nation.

Information provided by two community contacts that served the Wheeling MMSA AA, one state-chartered public agency with a mission to provide subsidized housing for eligible citizens in the AA and one interstate regional planning and development council of governments, indicated the most pressing needs of the area include:

- Financing for affordable housing.
- Community development funding.

Scope of Evaluation in Wheeling MMSA

The rating for the Wheeling MMSA AA is based on a full-scope evaluation of the bank's performance in the AA. There were no low-income geographies within this AA, therefore geographic distribution conclusions are based on performance in moderate-income geographies only. Examiners placed more emphasis on home mortgage loans versus small loans to businesses in arriving at the overall conclusion. HMDA loans represented the majority of HNB's lending in this AA. HNB did not originate any small loans to farms in this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WHEELING MMSA

LENDING TEST

The bank's performance under the Lending Test in the Wheeling MMSA AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Wheeling MMSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans 2016 - 2019					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Wheeling MMSA	639	181	0	2	822

Dollar Volume of Loans 2016 - 2019 (000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Wheeling MMSA	\$70,794	\$6,340	\$0	\$6,722	\$83,856

HNB ranked fourth in deposits out of 15 depository institutions (top 27 percent) in the Wheeling MMSA AA with a 7.1 percent market share. In overall HMDA lending, HNB ranked second out of 134 lenders (top 2 percent) with an 8.9 percent market share. The first and third top lenders in this market were Wesbanco Bank, Inc. with a 15.0 percent market share and Main Street Bank Corp. with a 7.1 percent market share.

For small loans to businesses, HNB ranked tenth out of 58 lenders (top 18 percent) with a market share of 3.4 percent. The top three lenders were Synchrony Bank with a market share of 15.0 percent, American Express National Bank with a market share of 13.7 percent, and Chase Bank USA, N.A. with a market share of 13.7 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the “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.

The geographic distribution of home mortgage loans was excellent.

- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies exceeded both the proportion of OOU’s and the aggregate distribution of loans in those geographies.
- For 2016, the bank’s geographic distribution of home mortgage loans was weaker than the bank’s geographic distribution of home mortgage loans for 2017 – 2019 due to lower distributions in moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was adequate.

- For 2017 – 2019, the proportion of small loans to businesses in moderate-income geographies was below both the proportion of small businesses located in those geographies and the aggregate distribution of loans to small businesses.
- For 2016, the bank’s geographic distribution of small loans to businesses was stronger than the bank’s geographic distribution of small loans to businesses for 2017 – 2019 due to better distribution in moderate-income geographies.

Lending Gap Analysis

The OCC analyzed HNB’s geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.
- For 2016, the bank’s borrower distribution of home mortgage loans was consistent with the bank’s borrower distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

- For 2017 – 2019, the percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of small businesses in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank’s borrower distribution of small loans to businesses with revenues of \$1 million or less was weaker than the bank’s distribution of small loans to businesses for 2017 – 2019 due to poorer distribution of loans to small businesses in the AA.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Wheeling MMSA AA is excellent. HNB made two loans in its AA for a total of \$6.7 million, which represented 23.0 percent of tier 1 capital allocated to the AA. The bank made significant use of innovative and/or complex CD loans; both loans involved complex projects in the LIHTC program and supported affordable housing projects. One example of a CD loan in the AA is a \$5.9 million construction loan to a LIHTC project for the renovation of 51 units of senior housing located within the AA. The project operated with a Section 8 contract for 50 of the units.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

The bank also made 16 unsecured home improvement loans totaling \$98,000 and 80 loans under the *Debt Manager* program totaling \$1.0 million.

INVESTMENT TEST

The institution's performance under the Investment Test in the Wheeling MMSA AA is Outstanding.

Based on a full-scope review, the institution's performance in the Wheeling MMSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Wheeling MMSA	4	158	11	4,357	15	100.0	4,515	100.0	2	15

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

** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 15.5 percent of tier 1 capital allocated to the AA.

The investments and grants reflected excellent responsiveness to needs identified in the AA, including affordable housing and community services for LMI individuals and geographies. The bank made six LIHTC project investments for \$4.5 million which involved complex syndications where the bank sometimes acted in a leadership role with participations from federal, state, local housing agencies, real

estate developers and other financial institutions. The bank's current period grants and donations of \$8,000 were to community service organizations that provided services to LMI individuals.

Examples of CD investments in the AA include:

- HCDC invested \$3.4 million in an 18-unit affordable housing construction project utilizing LIHTCs and a public housing subsidy. The property consisted of three sites in a moderate-income neighborhood northeast of downtown Wheeling, West Virginia.
- HCDC invested \$762,000 in a 40-unit LIHTC project in Wheeling, West Virginia.

SERVICE TEST

The institution's performance under the Service Test in the Wheeling MMSA AA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Wheeling MMSA AA was excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Wheeling MMSA	100.0	5	100	0.0	20.0	60.0	20.0	0.0	18.7	60.3	21.3

* May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA. There were no low-income geographies within the AA. HNB's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had five ATMs in the AA, all of which were deposit-taking.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Wheeling MMSA	0	1	0	0	0	-1

The institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank did not open any branches and closed one branch in an upper-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. HNB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open Monday through Thursday from 9:00 am to 4:00 pm or 5:00 pm, Friday from 9:00 am to 5:00 pm or 6:00 pm, and Saturday from 9:00 am to 12:00 pm. Out of the five branches, four had drive-through facilities and one was a drive-through facility only.

Community Development Services

The institution provided a significant level of CD services.

Bank employees provided financial or job-specific expertise and/or technical assistance for 45 CD service activities to seven organizations logging 243 qualified hours within this AA. The majority of the bank's assistance, 159 hours, was to organizations that provided community services to LMI individuals and families, including financial literacy education. Two bank employees also served on the board of directors for two nonprofit organizations, providing 50 hours of assistance. The bank's assistance was responsive to identified needs in the AA, particularly with financial education for LMI individuals and families.

The following are examples of CD services provided in this AA:

- One HNB employee served as a board member and raised funds for a local nonprofit organization that provides daycare to LMI families. The state of West Virginia acknowledges the level of poverty of these families by including a state subsidy for childcare which this daycare accepts.
- Five HNB employees provided financial education to inmates of an Ohio correctional institution who were nearing release. Statistics from this facility show that 80 percent of Ohio's inmates are high school dropouts, and 30 percent of male and 20 percent of female inmates are functionally illiterate. The average income of persons with less than a high school diploma approximates \$25,000 a year, reflecting that the individuals served are LMI.
- Eight HNB employees taught financial literacy classes in a Wheeling, West Virginia middle school. Approximately 60 percent of enrolled students received free or reduced lunches.

Youngstown-Boardman-Warren OH-PA (Youngstown) MMSA

CRA rating for the Youngstown MMSA⁴: 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:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses was adequate and overall borrower distribution was excellent.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.
- CD services were effective and responsive in addressing community needs. The bank provided a significant level of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in the Youngstown MMSA

HNB delineated the entirety of the Youngstown MMSA as an AA. Refer to appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, HNB had \$2.2 billion in deposits in the Youngstown MMSA AA, representing 2.6 percent of overall bank deposits. The bank originated and purchased \$757.6 million in loans, or 2.1 percent of total bank loan originations and purchases during the evaluation period. The bank's primary loan products in the Youngstown MMSA AA were home mortgage loans and small loans to businesses.

HNB operated 36 branches, representing 4.0 percent of the bank's branches, and 46 ATMs, of which 36 were deposit-taking. HNB ranked first out of 18 depository institutions with a 20.7 percent deposit market share. The second and third placed banks within the MMSA in terms of deposit market share were First National Bank of Pennsylvania with a 13.0 percent market share and Home Savings Bank with a 12.1 percent market share.

The following table provides a summary of the demographics, including housing and business information for the Youngstown MMSA AA.

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: Youngstown MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	155	14.2	20.0	45.8	20.0	0.0
Population by Geography	556,243	8.7	15.4	50.3	25.7	0.0
Housing Units by Geography	258,796	9.3	16.6	49.6	24.5	0.0
Owner-Occupied Units by Geography	161,805	5.1	12.5	53.0	29.3	0.0
Occupied Rental Units by Geography	68,359	14.5	23.7	44.7	17.0	0.0
Vacant Units by Geography	28,632	20.5	22.6	42.0	14.9	0.0
Businesses by Geography	32,460	7.7	12.3	44.6	35.3	0.0
Farms by Geography	1,230	2.0	6.4	55.9	35.7	0.0
Family Distribution by Income Level	146,502	20.5	18.4	20.6	40.5	0.0
Household Distribution by Income Level	230,164	23.9	16.1	18.0	42.0	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$55,174	Median Housing Value			\$98,762
			Median Gross Rent			\$630
			Families Below Poverty Level			12.7%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Information from the October 2019 Moody's Analytics report indicated the Youngstown MMSA AA economy faced challenging times due to annual employment declines in each of the last three years. One of the larger declines in employment occurred in 2019. A major U.S. automaker closed an automobile assembly plant in Lordstown, Ohio, part of the Youngstown MMSA, a plant that at one point employed 4,500 workers. An automobile manufacturer of electric vehicles has acquired the assembly plant but production at the plant will not occur until 2020 and the plant will only employ 400 workers. More broadly, manufacturers who sold motor vehicle parts and supplies to the closed plant struggle. Transportation equipment manufacturing makes up one-fifth of Youngstown's factory payrolls.

The Youngstown MMSA AA's strengths consist of a large healthcare industry, the area's advantageous location above the Utica and Marcellus shale reserves, and highly affordable and undervalued housing. An additional strength is the recent higher demand for specialty steel products tied to greater oil and gas exploration. The economy's weaknesses, however, include a heavy reliance on manufacturing, exposing the metropolitan area to large job losses in 2019, and a declining population that constrains long-term growth of basic service industries. Other manufacturing or production industries in the AA also declined in the last three years or show signs of future deterioration. Youngstown's steel industry produces steel tubes supporting oil and gas drilling operations. Active rig counts nationally declined from their post-energy-bust in mid-2018. Additionally, shale drillers found new ways to use less steel in their production of oil from shale. Steel related industries' employment decreased by seven percent in 2019. Statewide metal exports are down 15 percent year-over-year. Employment in the Youngstown MMSA AA has been near its pre-recession low for the past five years. Average hourly earnings improved modestly, but still lag the Ohio average.

The Youngstown MMSA AA's housing market struggles amid labor market and demographic challenges. House price appreciation in the AA ranks in the bottom 10 percent nationwide and has not accelerated in over a decade. Among U.S. Metropolitan areas losing large numbers of residents to out-migration since 2010, Youngstown ranks twelfth, nationwide. The exodus of working-age residents compounds labor market struggles and falling household formation negatively impacts housing demand.

Based on information in the above table, low-income families earned less than \$27,587 and moderate-income families earned less than \$44,139. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$690 for low-income borrowers and \$1,103 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be \$530.

The Youngstown MMSA AA's unemployment rate declined from 6.4 percent in 2016 to 5.6 percent in 2019 but remains above the national and Ohio average rates in 2019. Top employers in the MMSA include the Local, State, and Federal Government sector, Health Care/Services, Manufacturing, Call Centers, and Education.

Information provided by two nonprofit community contacts that served the Youngstown MMSA AA, one representing the city's planning and economic development department and the other a neighborhood development organization whose primary mission is to support strategic neighborhood reinvestment, indicated the most pressing needs of the area include:

- Working capital lines of credit for small developers, contractors, and do-it-yourselfers.
- Small loans and grants to use for home repair or rehabilitation, auto repair, emergencies, etc.
- Affordable rental properties.
- Workforce development programs.
- Financial literacy education and first-time homebuyer counseling.
- Tax preparation for LMI individuals and families.
- Affordable entry-level transaction accounts, credit repair products, secured credit cards, and second chance checking accounts.

Scope of Evaluation in Youngstown MMSA

The rating for the Youngstown MMSA AA is based on a full-scope evaluation of the bank's performance in the AA. Examiners placed more emphasis on home mortgage loans versus small loans to businesses and small loans to farms in arriving at the overall conclusion. HMDA loans represented the majority of HNB's lending in this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN YOUNGSTOWN MMSA

LENDING TEST

The bank's performance under the Lending Test in the Youngstown MMSA AA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Youngstown MMSA AA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans 2016 – 2019					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Youngstown MMSA	5,884	2,226	43	17	8,170

Dollar Volume of Loans 2016 - 2019 (000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Youngstown MMSA	\$562,261	\$192,962	\$2,358	\$15,613	\$773,194

HNB ranked first in deposits out of 18 depository institutions (top 6 percent), with a 20.7 percent market share in the AA. In overall HMDA lending, HNB ranked first out of 305 lenders (top 1 percent) with a 15.0 percent market share. The second and third top lenders in this market were Seven Seventeen Credit Union with an 8.4 percent market share and Home Savings Bank with a 5.8 percent market share.

For small loans to businesses, HNB ranked fourth out of 94 lenders (top 5 percent) with a market share of 8.3 percent. The top three lenders were American Express National Bank with a market share of 13.6 percent, Chase Bank USA, N.A. with a market share of 13.1 percent, and PNC Bank, N.A. with a market share of 11.3 percent.

For small loans to farms, HNB ranked fifth out of 14 lenders (top 36 percent), with a market share of 12.1 percent. The top three lenders were Farmers National Bank with a market share of 26.0 percent, Chase Bank USA, N.A. with a market share of 17.3 percent, and First National Bank of Pennsylvania with a 15.0 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the “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.

The geographic distribution of home mortgage loans was adequate.

- For 2017 – 2019, the proportion of home mortgage loans in low-income geographies was significantly below the proportion of OOUs but exceeded the aggregate distribution of loans in those geographies.
- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies was near-to the proportion of OOUs but exceeded the aggregate distribution of loans in those geographies.
- For 2016, the bank’s geographic distribution of home mortgage loans was stronger than the bank’s geographic distribution of home mortgage loans for 2017 – 2019 due to better distribution in low-income geographies.

Small Loans to Businesses

Refer to Table Q in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

- For 2017 – 2019, the proportion of small loans to businesses in both low- and moderate-income geographies exceeded both the proportion of small businesses located in those geographies and the aggregate distribution of loans to small businesses.
- For 2016, the bank’s geographic distribution of small loans to businesses was weaker than the bank’s geographic distribution of small loans to businesses for 2017 – 2019 due to poorer distribution in moderate-income geographies.

Small Loans to Farms

Refer to Table S in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was adequate considering that small farm lending was not a primary focus for the bank and only 8.4 percent of farms were in low- or moderate-income geographies.

- For 2017 – 2019, HNB did not make any small loans to farms in either low- or moderate-income geographies.
- For 2016, the bank did not make enough small loans to farms to complete a meaningful analysis.

Lending Gap Analysis

The OCC analyzed HNB’s geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.
- For 2016, the bank’s borrower distribution of home mortgage loans was consistent with the bank’s borrower distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

- For 2017 – 2019, the percentage of small loans to businesses with revenues of \$1 million or less was near-to the percentage of small businesses in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank’s borrower distribution of small loans to businesses with revenues of \$1 million or less was consistent with the bank’s distribution of small loans to businesses for 2017 – 2019

Small Loans to Farms

Refer to Table T in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was good considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, the percentage of small loans to farms with revenues of \$1 million or less was below the percentage of small farms in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank did not make enough small loans to farms to complete a meaningful analysis.

Community Development Lending

The institution made a good level of CD loans. CD lending had a neutral impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Youngstown MMSA AA was good. HNB made 17 loans totaling \$15.6 million, which represented 5.6 percent of allocated tier 1 capital. The bank made seven loans totaling \$3.7 million related to economic development. HNB made one loan totaling \$3.2 million for the primary purpose of affordable housing, a critical AA need. Additionally, the bank extended nine CD loans totaling \$8.7 million for the primary purpose of community services to assist LMI individuals.

Examples of CD Loans in the AA include:

- HNB renewed a \$2 million working capital line-of credit to a nonprofit designated as a Federally Qualified Health Center (FQHC) to provide medical services to the under-served. FQHCs provide community health centers, public housing centers, and outpatient health programs, and other programs serving migrants and the homeless.
- HNB provided a \$3.2 million LIHTC construction loan to build 40 permanent supportive housing units for homeless persons in a moderate-income geography in Youngstown, Ohio. This complex transaction contained various funding sources including LIHTC equity, an Ohio housing development assistance program, and a Federal Home Loan Bank (FHLB) Affordable Housing Program (AHP) grant.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Under the bank's *Community Access Mortgage* program, the bank funded three first-time homebuyer mortgages totaling \$125,000. Under the *HomeTown Mortgage* loan program, the bank funded 28 first-time homebuyer mortgages totaling \$1.8 million. The bank also made 131 unsecured home improvement loans totaling \$1.1 million and 720 loans under the *Debt Manager* program totaling \$8.4 million.

INVESTMENT TEST

The institution's performance under the Investment Test in the Youngstown MMSA AA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Youngstown MMSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Youngstown MMSA	6	2,652	52	25,094	58	100.0	27,746	100.0	4	36

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

** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 10.0 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution made extensive use of innovative and/or complex investments to support CD initiatives. The bank made 12 investments in LIHTC funds totaling \$18.3 million. HNB made four investments totaling \$6.8 million in local municipal bonds to improve services to their residents, of which more than 60 percent were low- or moderate-income. Additionally, the bank provided 34 grants totaling \$304,000 to a variety of organizations that primarily supported affordable housing, small business incubation, and community services.

Examples of CD investments in the AA include:

- HCDC invested \$5.5 million in an LIHTC rehabilitation project of 173 senior apartments. The location was in downtown Youngstown, Ohio, and targeted seniors aged 62 and older, earning up to 60 percent of the area median income (AMI). All 173 units will continue to receive Section 8 project-based rental assistance through a 20-year contract.
- HNB provided a complex \$3.5 million proprietary equity investment in a 40-unit LIHTC permanent supportive housing building for homeless persons in a moderate-income geography in Youngstown, Ohio. Permanent funding sources include the LIHTC equity, a state mental health organization, an Ohio housing development assistance program, and an FHLB AHP Program grant.

SERVICE TEST

The institution's performance under the Service Test in the Youngstown MMSA AA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Youngstown MSA AA was good.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Youngstown MMSA	100.0	36	100.0	5.6	16.7	38.8	38.9	8.7	15.4	50.3	25.7

* May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA. HNB's distribution of branches in low-income geographies was below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 46 ATMs in the AA, of which 36 were deposit-taking.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Youngstown MMSA	0	4	-1	0	-1	-2

The institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank did not open any branches during the evaluation period. HNB closed four branches, only one of which was in a low-income geography. While the closure lowered the number of branches in low-income geographies, there was minimal impact on the bank's ability to service LMI individuals as supported by the lending test conclusions. The branch was closed due to low customer usage.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. HNB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open Monday through Thursday from 9:00 am to 4:00 pm or 5:00 pm, Friday from 9:00 am to 5:00 pm or 6:00 pm, and Saturday from 9:00 am to 12:00 pm. Of the 36 branches, 18 had drive-through facilities and two were drive-up only facilities. HNB maintained the same hours as the lobby for all branches with drive-through facilities. Ten branches are located in grocery stores and were open Monday through Friday from 10:00 am to 7:00 pm, and Saturday and

Sunday from 10:00 am to 3:00 pm. HNB made all services available at all branches except the drive-up only facilities that served only as deposit/withdrawal operations.

Community Development Services

The institution provided a significant level of CD services.

Bank employees provided financial or job-specific expertise and/or technical assistance for 291 CD service activities to 38 organizations logging 2,031 qualified hours within this AA. The majority of the bank's assistance, 1,255 hours, was to organizations that provide community services to LMI individuals and families by providing financial literacy education in local schools. Two employees served on the board of directors for two nonprofit organizations, providing 344 hours of assistance. The bank's assistance was responsive to identified needs in the AA, particularly with financial education for LMI individuals and families.

The following are examples of CD services provided in this AA:

- One hundred-eleven HNB employees taught 1,255 hours of financial literacy classes in schools located in low-income geographies throughout the Youngstown MMSA AA. Between 93 percent and 100 percent of students participated in free and reduced lunch programs.
- One HNB employee served as a board member for the local chapter of a national nonprofit organization that trains volunteers to build or rehabilitate houses that are then sold at affordable prices to low-income borrowers with a below-market interest rate loan.
- One HNB employee served as a board member and on the loan fund committee of a local city business incubator that revitalized a downtown area located in a low-income geography. The activities of the board and loan fund committee include the promotion and funding for the expansion of small and micro technology-based businesses in the downtown revitalization area.

State Rating

State of Florida

CRA rating for the State of Florida: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution and borrower distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses were adequate.
- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an adequate level of qualified investments, grants, and donations.
- The bank's branches were reasonably accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

Description of Institution's Operations in Florida

HNB delineated one AA within Florida, which was the entire Naples-Immokalee-Marco Island, FL (Naples) MSA. Refer to appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, HNB had \$68.2 million in deposits in the Naples MSA AA, representing 0.1 percent of overall bank deposits. The bank originated and purchased \$127.9 million in loans, or 0.3 percent of total bank loan originations and purchases during the evaluation period.

HNB had only one branch in the Naples MSA AA, representing 0.1 percent of the bank's branches and had no ATMs. HNB ranked 28th out of 34 depository institutions with 0.4 percent deposit market share. The top three banks in the AA in terms of deposits are KeyBank, N.A. with a 13.4 percent market share, Fifth Third Bank with a 13.4 percent market share, and Wells Fargo Bank, N.A. with a 10.6 percent market share.

HNB's location in this AA is primarily a Private Financial Client Group (PFG) office used to service clients who live part-time in Naples, Florida, and the surrounding area. While this location provides services to non-PFG customers, the bank does not actively market loan products throughout the AA. As a result, examiners considered HNB's limited branch presence and retail product delivery when determining conclusions.

Naples MSA

The following table provides a summary of the demographics, including housing and business information for the Naples MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Naples MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	8.1	20.3	35.1	35.1	1.4
Population by Geography	341,091	7.2	23.5	38.0	31.3	0.0
Housing Units by Geography	201,582	3.6	18.3	38.0	40.0	0.0
Owner-Occupied Units by Geography	93,733	2.3	16.3	41.3	40.1	0.0
Occupied Rental Units by Geography	36,155	9.5	28.3	37.8	24.5	0.0
Vacant Units by Geography	71,694	2.4	15.9	33.8	47.8	0.0
Businesses by Geography	55,264	2.7	13.5	39.0	44.8	0.0
Farms by Geography	1,442	4.9	20.3	43.4	31.3	0.0
Family Distribution by Income Level	87,665	20.8	17.7	19.3	42.2	0.0
Household Distribution by Income Level	129,888	22.3	17.1	18.4	42.2	0.0
Median Family Income MSA - 34940 Naples-Marco Island, FL MSA		\$66,264	Median Housing Value			\$347,465
			Median Gross Rent			\$1,087
			Families Below Poverty Level			9.1%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Information from the October 2019 Moody's Analytics report indicated the Naples MSA AA economy has added jobs at nearly twice the national rate for most of 2019. Tourism continues as an economic driver. One in five employed people in the AA work in the leisure/hospitality industry. Construction contributed double-digit job growth for most of 2019. The metro area is adding residents more quickly than both the state and national rates, driven by retired senior citizens continuing to relocate to southwest Florida. Housing demands are high as the population grows. However, the area is relatively unaffordable compared with other Florida metro areas. Tourists and retirees continue to support service-related industries.

The largest employers in the Naples MSA AA include Publix Super Market Inc., Naples Community Hospital Inc., Walmart Inc., and Chico's Inc. According to U.S. Bureau of Labor Statistics (BLS), the unemployment rate for the Naples MSA AA in December 2019 was 2.5 percent, decreasing significantly from 4.7 percent in January 2016.

Based on information in the above table, low-income families earned less than \$33,132 and moderate-income families earned less than \$53,011. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$828 for low-income borrowers and \$1,865 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional

monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,865. Both low- and moderate-income borrowers would be challenged to afford a mortgage loan in this AA.

Information provided in an interview with a community contact that represented a housing development corporation serving the Naples MSA AA identified the following needs within the Naples MSA AA:

- Affordable mortgages.
- Housing rehabilitation loans and lines of credit.
- Financial education, including first-time homebuyer programs and counseling.
- Affordable entry-level transaction accounts, including credit repair products.
- Secured credit cards and small dollar loans.

Scope of Evaluation in Florida

Examiners based the rating of the state of Florida on the area that received a full-scope review. Examiners conducted a full-scope review of the Naples MSA AA, which was the only AA in the state. Examiners placed more emphasis on home mortgage loans versus small loans to businesses in arriving at the overall conclusion. HMDA loans represented the majority of HNB's lending in this AA. HNB did not originate any farm loans in the Naples MSA AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank's performance under the Lending Test in Florida is rated High Satisfactory

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Naples MSA AA was good.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans 2016 – 2019							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Naples MSA	202	72	0	1	275	100.0	100.0

Dollar Volume of Loans 2016 - 2019 (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Naples MSA	\$109,720	\$18,273	\$0	\$2,086	\$130,079	100.0	100.0

HNB ranked 28th in deposits out of 34 depository institutions (top 83 percent), with a 0.4 percent market share in the AA. In overall HMDA lending, HNB ranked 53rd out of 662 lenders with a 0.4 percent market share (top 9 percent). The top three lenders in this market were Wells Fargo Bank, N.A. with a 9.4 percent market share, Quicken Loans Inc. with a 4.3 percent market share, and JPMorgan Chase Bank, N.A. with a 3.7 percent market share.

For small loans to businesses, HNB ranked 38th ninth out of 129 lenders (top 30 percent) with a market share of 0.2 percent. The top three lenders were American Express National Bank with a 23.0 percent market share, Chase Bank USA, N.A. with a 12.0 percent market share, and Bank of America, N.A. with a 11.5 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was adequate considering the bank's strategic focus within the Naples MSA AA.

- For 2017 – 2019, the proportion of home mortgage loans in low-income geographies was significantly below the proportion of OOU's and well below the aggregate distribution of loans in those geographies.
- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies was well below both the proportion of OOU's and the aggregate distribution of loans in those geographies.
- For 2016, the bank's geographic distribution of home mortgage loans was consistent with the bank's geographic distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was adequate.

- For 2017 – 2019, the bank made no loans in low-income geographies.
- For 2017 – 2019, the proportion of small loans to businesses in moderate-income geographies was exceeded both the proportion of small businesses located in those geographies and the aggregate distribution of loans to small businesses.
- For 2016, the bank's geographic distribution of small loans to businesses was consistent with the bank's geographic distribution of small loans to businesses for 2017 – 2019.

Lending Gap Analysis

The OCC analyzed HNB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was adequate considering the bank's strategic focus within the Naples MSA AA.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA but well below the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers was significantly below both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.
- For 2016, the bank's borrower distribution of home mortgage loans was consistent with the bank's borrower distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

- For 2017 – 2019, the percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of small businesses in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank's borrower distribution of small loans to businesses with revenues of \$1 million or less was consistent with the bank's distribution of small loans to businesses for 2017 – 2019.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Naples MSA AA was excellent. HNB originated one CD loan totaling \$2.1 million, which represented 24.5 percent of tier 1 capital allocated to the AA. The loan was to acquire an existing five-location dry cleaner, of which two locations were in moderate-income geographies. The loan allowed for the retention of 34 jobs and the creation of four new jobs.

Product Innovation and Flexibility

The institution made no use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank's performance under the Investment Test in Florida is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Naples MSA AA was adequate.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Naples MSA	1	13	9	53	10	100.0	66	100.0	0	\$0

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

** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an adequate level of qualified CD investments or grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. While the dollar volume of current- and prior-period investments represented 0.8 percent of tier 1 capital allocated to the AA, consideration was given for a prior-period investment that unexpectedly paid off at the end of 2018. Market competition and lack of investment opportunities within the Naples MSA AA prevented HNB from obtaining a similar-sized investment during the last year of the evaluation period.

The institution exhibited adequate responsiveness to credit and community economic development needs. The institution rarely used innovative and/or complex investments to support CD initiatives. The bank provided nine grants totaling \$53,080 to a variety of organizations that primarily supported community services. The bank also had one prior-period investment of \$12,703 to a LIHTC fund that provided affordable housing.

SERVICE TEST

The bank's performance under the Service Test in Florida is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Naples MSA AA was adequate.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Naples MSA	100.0	1	100.0	0.0	0.0	0.0	100.0	7.2	23.5	38.0	31.3

* May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA. The bank had only one branch and no ATMs located in this AA. The branch was in an office building in an upper-income geography. This was reasonable considering the location was for private banking clients and not providing typical retail services.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Naples MSA	0	0	0	0	0	0

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

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. HNB's branch in the Naples MSA AA was open Monday through Friday from 9:00 am to 4:00 pm.

Community Development Services

The institution provided an adequate level of CD services.

Three HNB employees served in leadership roles for three different organizations in the Naples MSA AA by participating on boards and committees. They provided financial or job-specific expertise and/or technical assistance for 16 CD service activities, providing a total of 82 qualified hours.

The following are examples of CD services provided in this AA:

- An HNB employee was on the board of directors of two organizations supporting LMI education to public schools in Immokalee, Florida. The free and reduced lunch program participation rate at the county public schools exceeded 95.0 percent.
- One HNB employee was on the board of directors of an organization that provided shelter and services to victims of domestic violence and human trafficking. According to the organization, over 96.0 percent of its clients are LMI individuals.

State of Illinois

CRA rating for the State of Illinois: 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:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution and borrower distribution of the bank's originations and purchases of home mortgage loans, small loans to businesses, and small loans to farms were adequate.
- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.
- CD services were effective and responsive in addressing community needs. The bank provided a significant level of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Illinois

HNB delineated one AA within Illinois which was comprised of portions of the Chicago-Naperville-Arlington Heights, IL MD, the Elgin MD, and Lake County-Kenosha County, IL-WI MD. Examiners combined these MDs at the MSA level (Chicago MSA AA) for analysis and presentation purposes. Refer to appendix A for a list of counties reviewed. HNB did not have any branches in Illinois prior to its merger with FirstMerit in August 2016.

Based on June 30, 2019, FDIC summary of deposit information, HNB had \$2.5 million in deposits in the Chicago MSA AA, representing 2.9 percent of overall bank deposits. The bank originated and purchased \$275.0 million in loans, or 0.1 percent of total bank loan originations and purchases during the evaluation period. The bank's primary loan products in Illinois were home mortgage loans and small loans to businesses.

HNB had 35 branches in the Chicago MSA AA, representing 3.9 percent of the bank's branches and had 36 ATMs, of which 35 are deposit-taking. HNB ranked 18th out of 154 depository institutions with 0.6 percent deposit market share. The top three banks in the AA in terms of deposits include JPMorgan Chase Bank, N.A. with a 21.3 percent market share, BMO Harris Bank, N.A. with a 15.8 percent market share, and Bank of America, N.A. with a 9.1 percent market share.

Chicago MSA

The following table provides a summary of the demographics, including housing and business information for the Chicago MSA AA.

Table A – Demographic Information of the Assessment Area Assessment Area: Chicago MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,975	14.1	24.0	28.3	32.8	0.9
Population by Geography	8,385,941	10.1	24.0	30.8	34.9	0.2
Housing Units by Geography	3,334,182	10.4	22.8	30.8	35.7	0.3
Owner-Occupied Units by Geography	1,933,214	4.5	18.0	34.4	43.0	0.1
Occupied Rental Units by Geography	1,095,864	17.5	29.8	26.1	25.9	0.7
Vacant Units by Geography	305,104	22.4	28.0	24.7	24.5	0.5
Businesses by Geography	580,582	4.9	15.4	29.0	50.2	0.5
Farms by Geography	9,005	3.4	15.2	37.8	43.5	0.1
Family Distribution by Income Level	1,985,710	23.5	16.3	18.5	41.7	0.0
Household Distribution by Income Level	3,029,078	25.4	15.2	17.0	42.4	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$248,020
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,055
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137	Families Below Poverty Level			10.5%
Source: 2015 ACS Census and 2019 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Information from the November 2019 Moody's Analytics report indicated Chicago's economy is in a period of very slow growth. Employment growth decelerated or abated in most industries and the housing market is among the weakest in the top U.S. metro areas. The jobless rate declined to a new low of 3.6 percent as labor force gains moderated. Chicago's vast transportation and distribution network adds strength to the city's economy. Job growth in the logistics industry outpaced both national and other local industry growth levels. The city's central U.S. location and transportation advantages, such as the international airport with direct connections around the globe, make Chicago a distribution and logistics hub. E-commerce gains spurred major investments and jobs in transportation and warehousing grew at triple the pace of overall job growth during this expansion period.

The city's popularity with tourists fueled strong visitor spending but leisure/hospitality employment slowed with the U.S. economy. Per the Moody's Analytics report, investment income accounts for a large share of personal income for Chicago residents and although stocks traded near record highs in 2018 and 2019, a projected softening of the market in 2020 will increase risk to investor portfolios. Real estate offered little support and the lack of house price appreciation undermined wealth effect spending. Weak City of Chicago public finances make the Chicago MSA unusually vulnerable to the next economic downturn. Chicago and Illinois both struggle with mounting pension obligations and a shrinking population. The city's financial woes are among the most severe nationally. Trends in the

number of residents leaving Chicago exceeding the number of residents coming into Chicago indicate a looming tax base erosion. That in turn indicates a need to replace the tax base and the potential for taxes rising, which often causes more residents to leave than are coming into an area. Moody's Analytics' stress test of state budgets finds that Illinois is among the least prepared for the next recession. Longer term, Chicago will likely lag its peers and the nation because of adverse population trends and extraordinary fiscal pressure on the state and city governments.

Chicago remains a major center for business, distribution, transportation, and finance. The city has access to a large talent pool and many well-regarded educational institutions. Future employment expansion is expected from a new and growing high-tech center in the River North neighborhood. However, the city has definite weaknesses that must be overcome including state and local budgetary pressures, adverse population trends, and a high crime rate.

Based on information in the above table, low-income families earned between \$37,512 and \$43,569 and moderate-income families earned between \$60,019 and \$69,710, depending on the MD. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MD, this calculated to a maximum monthly mortgage payment between \$938 and \$1,089 for low-income borrowers and between \$1,500 and \$1,743 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be \$1,331. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

According to the U.S. BLS, the Chicago MSA AA unemployment rate decreased throughout the evaluation period, averaging 5.7 percent in 2016, 4.9 percent in 2017 and 2018, and 3.8 percent in 2019. In 2017 and 2018, the unemployment rate in the AA mirrored the overall state of Illinois unemployment rate but was slightly lower in 2016 and 2019. The state's unemployment rate averaged 5.8 percent in 2016, 4.9 percent in 2017 and 2018, and 4.0 percent in 2019.

Information provided by 11 community contacts, five from economic development entities, three from affordable housing organizations, and three from local government agencies, identified the following needs within the Chicago MSA AA:

- Credit building programs for those with credit scores under 600.
- Co-lending for community development.
- Micro loans and permanent capital grants to small businesses.
- Affordable mortgage loans, including those for home repair.
- Assistance for the unbanked and underbanked, including affordable deposit products.
- Small business development expertise.
- Financial literacy and first-time homebuyer education classes.
- Investment in community development financial institutions.

Scope of Evaluation in Illinois

Examiners based the rating of the state of Illinois on the area that received a full-scope review. Examiners conducted a full-scope review of the Chicago MSA AA, which was the only AA in the state. Examiners placed more emphasis on home mortgage loans versus small loans to businesses and small loans to farms in arriving at the overall conclusion. HMDA loans represented the majority of HNB's

lending in this AA. Examiners did not analyze 2016 data in Illinois as there was not enough data to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

The bank's performance under the Lending Test in Illinois is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago MSA AA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans 2017 - 2019							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Chicago MSA	9,549	2,671	22	16	12,258	100.0	100.0

Dollar Volume of Loans 2017 - 2019 (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Chicago MSA	\$2,701,230	\$358,051	\$2,914	\$76,962	\$3,139,157	100.0	100.0

HNB ranked 18th in deposits out of 154 depository institutions (top 12 percent), with a 0.6 percent market share in the AA. In overall HMDA lending, HNB ranked 11th out of 848 lenders (top 2 percent) with a 1.9 percent market share. The three top lenders in this market were JPMorgan Chase Bank, N.A. with a 11.3 percent market share, Wells Fargo Bank, N.A. with a 6.4 percent market share, and Guaranteed Rate, Inc. with a 5.6 percent market share.

For small loans to businesses, HNB ranked 24th out of 220 lenders (top 11 percent) with a market share of 0.4 percent. The top three lenders were Chase USA, N.A. with a 25.9 market share, American Express National Bank with a 17.0 percent market share, and Citibank, N.A. with an 8.9 percent market share. All three of these lenders issue significant numbers of small business credit cards as a primary business.

For small loans to farms, HNB ranked 13th out of 30 lenders (top 44 percent), with a market share of 1.8 percent. The top three lenders were Chase Bank USA, N.A. with a market share of 33.4 percent, John Deere Financial, F.S.B. with a market share of 10.2 percent, and U.S. Bank N.A. with a 9.8 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was adequate.

- For 2017 – 2019, the proportion of home mortgage loans in low-income geographies was below the proportion of OOU's but near-to the aggregate distribution of loans in those geographies.
- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies was below both the proportion of OOU's and the aggregate distribution of loans in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good.

- For 2017 – 2019, the proportion of small business loans in low-income geographies was well below the proportion of small businesses located in those geographies and below the aggregate distribution of loans to small business in those geographies.
- For 2017- 2019, the proportion of small business loans in moderate-income approximated the proportion of small businesses located in those geographies and was near-to the aggregate distribution of loans to small businesses in those geographies.

Small Loans to Farms

Refer to Table S in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was adequate considering that small farm lending was not a primary focus for the bank and only 3.4 percent of farms were in low- or moderate-income geographies.

- For 2017 – 2019, HNB did not make any small loans to farms in either low- or moderate-income geographies.

Lending Gap Analysis

The OCC analyzed HNB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was adequate.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA and below the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers was below both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.

Small Loans to Businesses

Refer to Table R in the Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

- For 2017 – 2019, the percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of small businesses in the AA but exceeded the aggregate distribution of all reporting lenders.

Small Loans to Farms

Refer to Table T in the Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was good considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, the percentage of small loans to farms with revenues of \$1 million or less was below the percentage of small farms in the AA but exceeded the aggregate distribution of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

HNB made 16 CD loans in its AA for a total of \$77.0 million, which represented 25.0 percent of tier 1 capital allocated to the AA. The bank originated 11 CD loans totaling \$52.0 million which were responsive to the community service needs of the AA, four of which were complex partnerships with other lenders. The bank made two CD loans totaling \$9.1 million that were responsive to the affordable housing needs in the AA. The bank also made two CD loans totaling \$4.9 million for economic development and one \$10.5 million CD loan for revitalization and stabilization.

Examples of CD loans in the AA include:

- HNB provided \$5.1 million as part of a syndicated loan to a local nonprofit that provides comprehensive services to individuals with disabilities or other special needs and their families, to improve quality of life and maximize independence. Eighty-one percent of those served are LMI.
- HNB renewed a \$5.0 million working capital line-of-credit to support the operations of a local skilled nursing facility that primarily serves an LMI population; Medicaid pays for 67 percent of the beds.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs.

Under the bank's *Community Access Mortgage* program, the bank funded one first-time homebuyer mortgage totaling \$171,000. Under the *HomeTown Mortgage* loan program, the bank funded eight first-time homebuyer mortgages totaling \$1.3 million. The bank also made 25 unsecured home improvement loans totaling \$265,000 and 105 loans under the *Debt Manager* program totaling \$1.5 million.

INVESTMENT TEST

The bank's performance under the Investment Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago MSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Chicago MSA	5	11,955	170	26,367	175	100.0	38,322	100.0	3	3,543

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

** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 12.4 percent of tier 1 capital allocated to the AA. This did not include unfunded commitments, which was an additional 1.2 percent of allocated capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution made extensive use of innovative and/or complex investments to support CD initiatives. The bank made investments in seven LIHTC projects for \$17.0 million that provided affordable housing. The bank made two investments totaling \$6.7 million in Small Business Investment Corporations that provide funding to small businesses. The majority of the bank's grants and donations, \$947,000, was to community service organizations that provide services to LMI individuals, primarily through providing affordable housing.

Examples of CD investments made in the AA include:

- HNB invested \$6.6 million in an LIHTC fund whose proceeds funded the rehabilitation of a 65-unit senior housing development property located in Joliet, Illinois.
- HNB invested \$3.5 million in a CDFI loan fund that provides low-cost loans for first-time and low-income homebuyers in the Chicago MSA AA.

SERVICE TEST

The bank's performance under the Service Test in Illinois is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in Illinois was good.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Chicago MSA	100.0	35	100.0	5.7	22.9	22.8	48.6	11.1	23.6	30.4	34.7

* May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below, and in moderate-income geographies approximated, the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery

availability and access to banking services to both retail and business customers. HNB had 36 ATMs in the AA, of which 35 were deposit-taking.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Chicago MSA	1	5	0	1	-2	-3

To the extent changes have been made, the institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed five branches, none in low- or moderate-income geographies. The bank opened one branch in a moderate-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. branches were open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 to 6:00 pm, and Saturday from 9:00 am to 12:00 pm. Out of the 35 branches, 26 had drive-through facilities that were open the same hours as the branch lobbies.

Community Development Services

The institution provided a significant level of CD services.

Employees provided financial or job-specific expertise and/or technical assistance for 354 CD service activities to 59 organizations logging 1,957 qualified hours within this AA. Over 1,048 hours of assistance were to organizations that provide community services to LMI individuals and families, including financial literacy and first-time homebuyer education. Other activities, totaling over 383 hours that target small business assistance and board of director and committee member service and 258 hours providing workforce development training. The bank's assistance was responsive to identified needs in the AA, particularly with financial education and homebuyer counseling and education for LMI individuals and families.

The following are examples of CD services provided in this AA:

- Twenty-one HNB employees provided 358 hours for a first-time homebuyer program presentation in conjunction with an organization whose mission were to provide comprehensive counseling, education, and housing resources for LMI families in the Chicagoland area.
- Fifteen HNB employees provided 258 hours for a workforce development program for LMI high school students with a 501(c)(3) not-for-profit charitable organization that provides paid summer internships, business and financial literacy education and scholarships to Chicago high school students.

State of Indiana

CRA rating for the State of Indiana⁵: 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:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses was good and overall borrower distribution was excellent.
- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.
- CD services were effective and responsive in addressing community needs. The bank provided a significant level of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Indiana

HNB delineated two AAs within Indiana. They included portions of the Indianapolis-Carmel-Anderson, IN (Indianapolis) MSA and the Lafayette-West Lafayette, IN (Lafayette) MSA. Refer to appendix A for a list of counties reviewed within each AA.

Based on June 30, 2019, FDIC summary of deposit information, HNB had \$3.7 billion of deposits in Indiana, which represented 4.5 percent of the bank's overall deposits. The bank originated and purchased \$2.4 billion in loans or 6.6 percent of total bank loan originations and purchases during the evaluation period. The bank's primary loan products in Indiana were home mortgage loans and small loans to businesses.

HNB operated 45 branches, representing 5.0 percent of the bank's branches, and 72 ATMs, of which 58 were deposit-taking. HNB ranked ninth out of 42 depository institutions with a 2.4 percent deposit market share. The leading three depository institutions in the state were JPMorgan Chase Bank, N.A. with a 21.5 percent market share, PNC Bank, N.A. with a 13.5 percent market share and Fifth Third Bank with an 8.4 percent market share.

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.

Indianapolis MSA

The following table provides a summary of the demographics, including housing and business information for the Indianapolis MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Indianapolis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	353	18.4	28.0	29.5	23.5	0.6
Population by Geography	1,712,841	11.9	23.9	30.3	33.5	0.3
Housing Units by Geography	732,082	13.7	26.1	29.4	30.7	0.2
Owner-Occupied Units by Geography	416,489	6.9	18.4	34.3	40.3	0.1
Occupied Rental Units by Geography	237,442	20.6	36.9	23.7	18.6	0.3
Vacant Units by Geography	78,151	28.9	34.0	20.9	15.7	0.4
Businesses by Geography	140,496	10.0	20.4	29.9	39.6	0.1
Farms by Geography	3,745	5.3	13.2	43.8	37.4	0.2
Family Distribution by Income Level	420,081	22.4	17.2	19.1	41.3	0.0
Household Distribution by Income Level	653,931	24.2	16.4	17.6	41.8	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$144,103
			Median Gross Rent			\$832
			Families Below Poverty Level			11.1%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The Indianapolis MSA AA consisted of six of the 11 counties in the Indianapolis-Carmel-Anderson, IN MSA. According to the FDIC's Summary of Deposits as of June 30, 2019, HNB's deposits in the AA comprised 4.8 percent of the bank's total deposits.

Within the Indianapolis MSA AA, the bank had \$3.6 billion in deposits and ranked fourth out of 39 depository institutions in the AA with an 8.9 percent market share. The top three depository institutions in the AA are JPMorgan Chase Bank, N.A. with a 20.9 percent market share, PNC Bank, N.A. with a 14.2 percent market share, and Fifth Third Bank with an 8.6 percent market share. HNB operated 43 branches and 70 ATMs in the AA, of which 56 were deposit-taking.

Information from the October 2019 Moody's Analytics report indicated the Indianapolis MSA AA economy slowed in 2019, with its business cycle considered to be in the late expansion portion of the cycle. The labor market tightened as reflected by the unemployment rate declining to less than three percent. According to the U.S. BLS, the unemployment rate for the Indianapolis MSA AA declined from 4.6 percent in January 2016 to 2.6 percent in December 2019, and the poverty rate was 19.1 percent in 2018. Between 2016-2019, this MSA experienced a small increase in population, while the rest of the state population declined. The primary industries include health-technology, manufacturing, and health services. The Indianapolis MSA AA has grown into a regional technology hub; a deep talent pool exists, and startups continue to secure venture capital funding. Manufacturing has held steady, although a shift toward automation may reduce the need for labor. The largest employers in the

Indianapolis MSA AA include Indiana University Health, St. Vincent Hospitals and Health Services, Eli Lilly and Co., and Community Health Network.

Based on information in the above table, low-income families earned less than \$33,402 and moderate-income families earned less than \$53,442. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$835 for low-income borrowers and \$1,336 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$774.

According to the U.S. BLS, the Indianapolis MSA AA unemployment rate decreased throughout the evaluation period, averaging 4.1 percent in 2016, 3.3 percent in 2017, 3.2 percent in 2018 and 2019. The state's unemployment rate averaged 4.4 percent in 2016, 3.5 percent in 2017 and 2018, and 3.2 percent in 2019.

Information provided by of two community contacts that served the Indianapolis MSA AA, one a statewide community economic development association and the other a community-based development corporation, identified the following needs in the AA:

- Funding for affordable housing, including multi-family housing.
- Affordable mortgages, rehabilitation loans, and lines of credit.
- Financial literacy and first-time homebuyer programs.
- Small business development, including micro-lending and support for organizations offering small business training, education, and counseling.
- Small dollar loans.

Scope of Evaluation in Indiana

Examiners selected the Indianapolis MSA AA for a full-scope review, as it had the largest percentage of deposits and reported loans within the state at 95.7 percent and 94.3 percent, respectively. The Lafayette MSA received a limited-scope review. Refer to appendix A for more information.

Examiners based the ratings on the results of the area that received a full-scope review and the bank's performance in the limited-scope areas, as applicable. The Indianapolis MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Indiana.

Examiners placed more emphasis on home mortgage loans versus small loans to businesses and small loans to farms in arriving at the overall conclusion. HMDA loans represented the majority of HNB's lending in all both AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

The bank's performance under the Lending Test in Indiana is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Indianapolis MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans 2016 - 2019*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Indianapolis MSA	9,275	2,854	28	19	12,176	93.0	95.7
Limited-Scope:							
Lafayette MSA	727	188	1	2	918	7.0	4.3
Total	10,002	3,042	29	21	13,094	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans 2016 - 2019* (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Indianapolis MSA	\$1,424,413	\$274,824	\$2,053	\$56,794	\$1,758,084	94.3	95.7
Limited-Scope:							
Lafayette MSA	\$91,602	\$12,347	\$20	\$2,091	\$106,060	5.7	4.3
Total	\$1,516,015	\$287,171	\$2,073	\$58,885	\$1,864,144	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

HNB ranked fourth in deposits out of 39 depository institutions (top 11 percent), with an 8.9 percent market share in the AA. In overall HMDA lending, HNB ranked first out of 581 lenders (top 1 percent) with a 5.6 percent market share. The second and third top lenders in this market were Caliber Home Loans with a 5.5 percent market share and JPMorgan Chase Bank, N.A. with a 4.8 percent market share.

For small loans to businesses, HNB ranked seventh out of 144 lenders (top 5 percent) with a market share of 3.5 percent. The top three lenders were Chase USA, N.A. with a 22.2 market share, American Express National Bank with a 16.0 percent market share, and PNC Bank, N.A. with an 9.8 percent market share. All three of these lenders issue significant numbers of small business credit cards as a primary business.

For small loans to farms, HNB ranked ninth out of 30 lenders (top 30 percent), with a market share of 2.7 percent. The top three lenders were John Deere Financial, F.S.B. with a market share of 17.6 percent, Chase Bank USA, N.A. with a market share of 17.3 percent, and First Farmers Bank and Trust with a 16.5 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good.

- For 2017 – 2019, the proportion of home mortgage loans in low-income geographies was below the proportion of OOU's but exceeded the aggregate distribution of loans in those geographies.
- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies exceeded both the proportion of OOU's and the aggregate distribution of loans in those geographies.
- For 2016, the bank's geographic distribution of home mortgage loans was weaker than the bank's geographic distribution of home mortgage loans for 2017 – 2019 due to lower distributions in both low- and moderate-income geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was adequate.

- For 2017 – 2019, the proportion of small business loans in both low- and moderate-income geographies was below the proportion of small businesses located in those geographies but near-to the aggregate distribution of loans to small businesses in those geographies.
- For 2016, the bank's geographic distribution of small loans to businesses was consistent with the bank's geographic distribution of small loans to businesses for 2017 – 2019.

Small Loans to Farms

Refer to Table S in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was adequate considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, the proportion of small loans to farms loans in low-income geographies was below the proportion of small farm loans located in those geographies but exceeded the aggregate distribution of loans to small farms in those geographies.
- For 2017 – 2019, the bank did not make any small loans to farms in moderate-income geographies.
- For 2016, the bank did not make enough loans to complete a meaningful analysis.

Lending Gap Analysis

The OCC analyzed HNB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.
- For 2016, the bank's borrower distribution of home mortgage loans was weaker than the bank's borrower distribution of home mortgage loans for 2017 – 2019 due to poorer distribution to low-income borrowers.

Small Loans to Businesses

Refer to Table R in the Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

- For 2017 – 2019, the percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of small businesses in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank's borrower distribution of small loans to businesses with revenues of \$1 million or less was consistent with the bank's distribution of small loans to businesses for 2017 – 2019.

Small Loans to Farms

Refer to Table T in the Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was good considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, the percentage of small loans to farms with revenues of \$1 million or less was below the percentage of small farms in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank did not make enough small loans to farms to complete a meaningful analysis.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Indianapolis MSA AA was excellent. HNB made 19 CD Loans for a total of \$56.8 million, which represented 12.7 percent of tier 1 capital allocated to the AA. The bank originated seven CD loans, four of which were complex LIHTC transactions, totaling \$38.9 million for the creation or rehabilitation of 719 affordable housing units. The bank made nine loans totaling \$5.8 million responsive to community service needs of the AA. The bank also made two CD loans totaling \$3.2 million for economic development and one \$8.9 million CD loan for revitalization and stabilization.

Examples of CD Loans in the AA include:

- HNB renewed a \$2.0 million working capital revolving line-of-credit to a private not-for-profit organization providing mental health and addiction services for all ages. Approximately 83 percent of the organization's 2019 revenue came from Medicaid reimbursements.
- HNB provided a new \$7.5 million complex construction loan and a \$1.2 million permanent loan to finance the construction of 60 senior LIHTC units located in a moderate-income geography in Indianapolis, Indiana. The project will be rented to individuals below 60 percent of the AMI.
- HNB provided both the leadership for the syndication and the funds for a new complex \$7.0 million construction loan to fund the rehabilitation of two existing affordable housing projects. One of the projects located in a middle-income geography will create 44 permanent supportive LIHTC affordable units. The second project, located in a low-income geography, will create 28 LIHTC affordable units. The Housing and Urban Development's (HUD) Continuum of Care program intended to provide rental assistance to 54 of the 72 units. Eighteen unsubsidized units will target households with income up to 60 percent of the AMI.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Under the bank's *Community Access Mortgage* program, the bank funded 15 first-time homebuyer mortgages totaling \$1.2 million. Under the *HomeTown Mortgage* loan program, the bank funded 258 first-time homebuyer mortgages totaling \$31.6 million. The bank also made 118 unsecured home improvement loans totaling \$1.1 million and 518 loans under the *Debt Manager* program totaling \$6.0 million.

Conclusions for Areas Receiving Limited-Scope Reviews

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

Refer to Tables O through T in the state of Indiana sections of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Indiana is rated Outstanding

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Indianapolis MSA AA was excellent.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Indianapolis MSA	15	7,892	114	47,964	129	92.1	55,856	98.6	3	250
Limited-Scope										
Lafayette MSA	1	0	10	814	11	7.9	814	1.4	0	0
Total	16	7,892	124	48,778	140	100.0	56,670	100.0	3	250

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

*** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 12.5 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution made extensive use of innovative and/or complex investments to support CD initiatives. The bank made seven single investor LIHTC project investments for \$26.1 million and invested in 10 LIHTC syndications totaling \$10.4 million. HNB made five investments totaling \$15.6 million in local municipal bonds to improve services to their residents, of which more than 60 percent were low- or moderate-income. HNB made the majority of its current period grants and donations of \$830,000 to a variety of organizations that primarily supported community services to low- and moderate-income individuals.

Examples of CD investments in the AA include:

- HNB made a \$10.8 million investment in a LIHTC that transformed a 96-unit single room occupancy property into 44 efficiency apartments and renovated a second 28-unit complex to create 72 units of affordable rental housing.
- HNB invested \$8.7 million in a LIHTC project for the construction of 60 affordable housing units. The units will be for seniors, age 65 or older, with incomes at or below 60 percent of the AMI.
- HNB purchased \$2.0 million in municipal bonds that funded the cost of acquisition and construction of a public safety building and fire station in a moderate-income geography.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Lafayette MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope areas due to a lower level of qualified investments. The institution's performance under the Investment Test in the limited-scope area had a neutral impact on the overall Investment Test rating for the state of Indiana.

SERVICE TEST

The bank's performance under the Service Test in Indiana is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Indianapolis MSA AA was good.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)**				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Indianapolis MSA	95.7	43	95.6	7.3	23.3	34.9	34.9	11.9	23.9	30.3	33.5
Limited-Scope:											
Lafayette MSA	4.3	2	4.4	0.0	50.0	0.0	50.0	6.1	18.7	31.0	35.1

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below, and in moderate-income geographies approximated, the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had operated 43 branches and 70 ATMs in the AA, of which 56 were deposit-taking.

Distribution of Branch Openings/Closings*						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Indianapolis MSA	1	5	0	-1	-2	-1
Limited-Scope:						
Lafayette MSA	0	2	0	-1	-1	0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes were made, the institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed five branches, of which only one was in a moderate-income geography. The grocery store, in which the branch was located, closed, resulting in the corresponding closure of the branch. While the closure did lower the number of branches in moderate-income geographies, there was minimal impact on the bank's ability to service LMI individuals as supported by the lending test conclusions. The bank opened one branch in an upper-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. Branches were open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm, and Saturday from 9:00 am to 12:00 pm. The branches inside grocery stores were open Sunday through Saturday from 7:00 am to 10:00 pm each day. All HNB services are available to all AAs.

Community Development Services

The institution provided a significant level of CD services.

Employees provided financial or job-specific expertise and/or technical assistance for 557 CD service activities to 40 organizations during the evaluation period, logging a total of 2,734 qualified hours within the AA. A majority of the bank's assistance, 1,720 hours, were to organizations that provided financial literacy and first-time homebuyer education to LMI individuals and families. The bank also provided 581 hours of tax preparation assistance to LMI individuals and families.

The following are examples of CD services provided in the AA:

- Ninety-one HNB employees provided 978 hours of financial education to 14 organizations for LMI students and individuals. The students qualify for free and reduced lunch programs.
- Twelve HNB employees provided 223 hours of board of directors and technical assistance for 13 qualified community development organizations that focus on affordable housing, small business development, and community services to LMI individuals and families.

Conclusions for Area Receiving a Limited-Scope Review

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

State of Michigan

CRA rating for the State of Michigan: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution and borrower distribution of the bank's originations and purchases of home mortgage loans, small loans to businesses, and small loans to farms were good.
- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made a significant level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.
- CD services were effective and responsive in addressing community needs. The bank provided a significant level of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Michigan

HNB delineated 16 AAs within Michigan. They included the entirety or portions of the Detroit-Warren-Dearborn, MI (Detroit) MSA; Ann Arbor, MI (Ann Arbor) MSA; Battle Creek, MI (Battle Creek) MSA; Bay City, MI (Bay City) MSA; Flint, MI (Flint) MSA; Grand Rapids-Wyoming, MI (Grand Rapids) MSA; Jackson, MI (Jackson) MSA; Kalamazoo-Portage, MI (Kalamazoo) MSA; Lansing-East Lansing, MI (Lansing) MSA; Midland, MI (Midland) MSA; Monroe, MI (Monroe) MSA; Muskegon, MI (Muskegon) MSA; Niles-Benton Harbor, MI (Niles) MSA; Saginaw, MI (Saginaw) MSA; South Bend-Mishawaka, IN-MI (South Bend) MSA, and 31 non-MSA counties (Michigan Non-MSA) which examiners combined as one AA for analysis and presentation. Refer to appendix A for a list of counties reviewed within each AA. The bank closed its locations in the South Bend MSA on September 9, 2017. Analysis for this limited-scope AA was completed only for 2016 data.

Michigan represented the bank's second largest rated area by deposits. Based on June 30, 2019, FDIC summary of deposit information, HNB had \$16.9 billion of deposits in Michigan, which represented 20.1 percent of the bank's overall deposits. The bank originated and purchased \$9.0 billion in loans or 24.4 percent of total bank loan originations and purchases during the evaluation period. The bank's primary loan products in Michigan were home mortgage loans and small loans to businesses.

HNB operated 287 branches, representing 31.6 percent of the bank's branches, and 382 ATMs, of which 343 were deposit-taking. HNB ranked fifth out of 115 depository institutions with a 7.4 percent deposit market share. The leading three depository institutions in the state were JPMorgan Chase Bank, N.A.

with a 19.6 percent market share, Comerica Bank, N.A. with a 12.8 percent market share, and Bank of America, N.A. with a 10.1 percent market share.

The 2019 OMB changes affected limited-scope AAs in this state. The OMB removed Barry County, Michigan from the Grand Rapids MSA and replaced it with Ionia County, Michigan, which was previously classified as a non-metropolitan area. The bank did not have any branches in Barry County, Michigan. As a result, data from Ionia County, Michigan for 2016 – 2018 was included in the Michigan Non-MSA analysis and 2019 data was included in the Grand Rapids MSA analysis.

Detroit MSA

The following table provides a summary of the demographics, including housing and business information for the Detroit MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Detroit MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,301	13.5	25.7	31.5	27.4	1.9
Population by Geography	4,296,416	10.2	24.1	33.8	31.6	0.2
Housing Units by Geography	1,891,400	12.0	25.7	33.2	28.8	0.3
Owner-Occupied Units by Geography	1,148,793	6.1	20.4	37.0	36.5	0.1
Occupied Rental Units by Geography	514,155	18.8	33.0	29.6	18.1	0.5
Vacant Units by Geography	228,452	26.4	36.3	22.2	14.0	1.1
Businesses by Geography	278,412	7.8	21.2	31.1	39.3	0.6
Farms by Geography	6,880	4.9	18.9	43.5	32.5	0.3
Family Distribution by Income Level	1,081,123	22.9	16.7	18.9	41.4	0.0
Household Distribution by Income Level	1,662,948	25.2	15.6	17.0	42.2	0.0
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI		\$52,733	Median Housing Value			\$129,261
Median Family Income MSA - 47664 Warren-Troy- Farmington Hills, MI		\$76,739	Median Gross Rent			\$863
			Families Below Poverty Level			12.7%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The Detroit MSA AA consisted of all counties in the Detroit-Dearborn-Livonia, MI Metropolitan Division (MD) and the Warren-Troy-Farmington Hills, MI MD. These MDs were combined for analysis and presentation at the MSA level. According to the FDIC's Summary of Deposits as of June 30, 2019, HNB's deposits in the AA comprised 9.9 percent of the bank's total deposits, making this AA the bank's third largest in terms of deposits held.

Within the Detroit MSA AA, the bank had \$8.3 billion in deposits and ranked sixth out of 40 depository institutions in the AA with a 5.8 percent market share. The top three ranked depository institutions in terms of deposit market share were JPMorgan Chase Bank, N.A. with a 26.0 percent market share,

Comerica Bank, N.A. with an 18.6 percent market share, and Bank of America, N.A. with a 14.7 percent market share. HNB operated 108 branches and 148 ATMs in the AA, of which 136 were deposit-taking.

Information from the October 2019 Moody's Analytics report indicated the Detroit MSA AA economy remained in a recovery period. The AA's strengths centered in the automobile (auto) industry with the Ford Motor Co and General Motors (GM) as the top two employers. The University of Michigan and Fiat Chrysler Automobiles (FCA) are also key employers in the AA, as are several healthcare systems. The auto companies particularly influence the Detroit economy given the auto parts and components manufacturers in the AA that supply and rely on the top three U.S. auto makers to purchase their products. The healthcare services industry is also a key employer, due to the increasingly elderly populations in the area. The United Auto Workers 40-day strike early in 2019 caused widespread layoffs in Detroit for auto suppliers, shippers, and restaurants. Notwithstanding the strike and resulting declines in company profitability, auto and auto part manufacturers in the AA continued to funnel capital into the economy. Nissan announced plans to build a \$41 million crash test facility in Farmington Hills (Detroit/Warren suburb) while FCA planned to add 1,500 jobs by 2020 after retooling its Warren truck plant for the next-generation Ram Heavy Duty pickup. Analysts expected the retooling to spur investment by auto suppliers, although, metal tariffs raise input costs and accelerate the application of labor-saving technologies.

The AA has a high reliance on the domestic vehicle industry and therefore has very high employment volatility. At eight percent, Detroit's concentration of jobs in transportation / warehousing ranks high for a metro area of its size. The economy's weaknesses showed up in waning housing and labor markets. Strengths included auto-related research and development centers, headquarters for the automakers and suppliers, and above-average per capita income. Individuals between the ages of 20-59 years comprise approximately 54 percent of the AA's population. On the upside for the Detroit MSA economy, transportation, and warehousing logistics investments attracted skilled youth and spurred additional corporate expansions. On the downside for the MSA, steel and aluminum tariffs weighed heavily on the leading industries; automakers and their suppliers, as did rising gas prices. These represented drags on the economy that caused some increased out-migration because of poor job prospects and low incomes. People also left the Detroit MSA AA because of its below-average quality of life, high crime rate, and eroding infrastructure.

Based on information in the above table, low-income families earned between \$26,367 and \$38,370 and moderate-income families earned between \$42,186 and \$61,391, depending on the MD. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MD, this calculated to a maximum monthly mortgage payment between \$659 and \$959 for low-income borrowers and between \$1,055 and \$1,535 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$694. Low-income borrowers would be challenged to afford a mortgage loan in the Detroit MD portion of the AA.

According to the U.S. BLS, the Detroit MSA AA unemployment rate mirrored the rest of the country and declined from 5.3 percent in 2016 to 4.3 percent in 2019 but was higher than the 3.9 percent for the state of Michigan and 3.5 percent for the U.S. in 2019. The unemployment rate in the AA did not vary significantly from the state of Michigan throughout the evaluation period. The state's unemployment rate averaged 5.0 percent in 2016, 4.6 percent in 2017, 4.2 percent in 2018, and 4.1 percent in 2019.

Information provided by three community contacts, one each from a housing commission that helped residents find safe and affordable housing, a metropolitan community action agency, and a state housing development agency, and also from an OCC/FDIC-sponsored community listening session with community leaders from 15 community-based organizations within the greater Detroit area identified the following needs within the Detroit MSA AA:

- Grants and repair/rehabilitation loans to improve the existing rental units and housing stock.
- Small, easily obtained cash loans to combat predatory lending by payday lenders.
- Lines of credit for small business cash flow.
- Financial education to improve potential borrowers' credit scores.
- Economic development loans for job creation at living wages in LMI geographies.
- Emergency utility assistance
- Funding for childcare and transportation assistance to LMI individuals.
- "Second chance" products that allow residents access to low cost and minimum balance retail bank products/services.
- Increased options and access to mainstream mortgage financing in markets that continue to struggle with low appraisal values in the aftermath of high foreclosure rates.
- High LTV loan limits to offset low appraisals, and expansion of higher debt-to-income (DTI) limits (up to 45 percent) to allow for increased LMI homeownership.
- Increased access to affordable home renovation financing with high LTVs and greater DTI.
- Expanded access to financial education and financial service programs targeted to disabled people and individuals re-entering the communities from the penal system.
- Small business lending with loans between \$50,000 and \$250,000.
- Financial education for small business owners.
- Grants for nonprofit organizations that provide financial education services, affordable and sustainable homeownership counseling.

Scope of Evaluation in Michigan

The state of Michigan was HNB's second largest market. Examiners selected the Detroit MSA AA for a full-scope review. The Detroit MSA AA had the largest percentage of deposits and reported loans within the state at 49.2 percent and 40.7 percent, respectively. The Ann Arbor MSA, Battle Creek MSA, Bay City MSA, Flint MSA, Grand Rapids MSA, Jackson MSA, Kalamazoo MSA, Lansing MSA, Midland MSA, Monroe MSA, Muskegon MSA, Niles MSA, Saginaw MSA, South Bend MSA, and the Michigan Non-MSA AAs received limited-scope reviews. Refer to appendix A for more information.

Examiners based the ratings on the results of the area that received a full-scope review and the bank's performance in the limited-scope areas, as applicable. The Detroit MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Michigan.

Examiners placed more emphasis on home mortgage loans versus small loans to businesses and small loans to farms in arriving at the overall conclusion. HMDA loans represented the majority of HNB's lending in all 16 AAs. Only the Detroit MSA and Grand Rapids MSA AAs had enough small loans to farms to complete a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

The bank's performance under the Lending Test in Michigan is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans 2016 - 2019*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Detroit MSA	17,037	8,111	78	56	25,282	40.7	49.2
Limited-Scope:							
Ann Arbor MSA	1,658	362	8	0	2,028	3.3	1.6
Battle Creek MSA	210	63	0	1	274	0.4	0.1
Bay City MSA	444	114	8	1	567	0.9	1.0
Flint MSA	1,547	678	17	20	2,262	3.6	6.8
Grand Rapids MSA 2016-2018	5,386	2,640	73	30	11,590	18.7	14.9
Grand Rapids MSA 2019	2,622	821	18				
Jackson MSA	995	195	3	4	1,197	1.9	1.7
Kalamazoo MSA	558	207	6	3	774	1.2	0.6
Lansing MSA	1,583	676	18	9	2,286	3.7	3.3
Midland MSA	207	49	0	1	257	0.4	0.5
Monroe MSA	1,474	261	4	0	1,739	2.8	2.2
Muskegon MSA	1,537	408	5	3	1,953	3.1	1.2
Niles MSA	255	83	2	1	341	0.5	0.3
Saginaw MSA	783	322	7	9	1,121	1.8	3.2
South Bend MSA 2016	38	11	1	0	50	0.1	0.1
Michigan Non-MSA 2016-2018	5,432	1,735	83	18	10,375	16.7	13.3
Michigan Non-MSA 2019	2,538	550	19				
Total	44,304	17,286	350	156	62,096	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans 2016 - 2019* (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Detroit MSA	\$3,056,975	\$1,058,484	\$5,642	\$325,306	\$4,446,407	46.7	49.2
Limited-Scope:							
Ann Arbor MSA	\$364,316	\$41,539	\$157	\$0	\$406,012	4.3	1.6
Battle Creek MSA	\$18,734	\$5,898	\$0	\$11,225	\$35,857	0.4	0.1
Bay City MSA	\$38,530	\$5,307	\$170	\$11,815	\$55,822	0.6	1.0
Flint MSA	\$166,744	\$101,960	\$839	\$25,248	\$294,791	3.1	6.8
Grand Rapids MSA 2016-2018	\$798,642	\$310,725	\$4,231	\$125,552	\$1,722,364	18.1	14.9
Grand Rapids MSA 2019	\$384,234	\$98,057	\$923				
Jackson MSA	\$106,358	\$27,255	\$452	\$8,005	\$142,070	1.5	1.7
Kalamazoo MSA	\$89,235	\$34,804	\$225	\$2,205	\$126,469	1.3	0.6
Lansing MSA	\$217,761	\$74,086	\$612	\$31,838	\$324,297	3.4	3.3
Midland MSA	\$31,581	\$7,110	\$0	\$5	\$38,696	0.4	0.5
Monroe MSA	\$173,876	\$18,166	\$95	\$0	\$192,137	2.0	2.2
Muskegon MSA	\$161,985	\$39,582	\$562	\$13,453	\$215,582	2.3	1.2
Niles MSA	\$45,327	\$7,606	\$35	\$12,696	\$65,664	0.7	0.3
Saginaw MSA	\$80,173	\$42,210	\$182	\$1,939	\$124,504	1.3	3.2
South Bend MSA 2016	\$3,984	\$1,731	\$10	0	\$5,725	0.1	0.1
Michigan Non-MSA 2016-2018	\$723,916	\$162,304	\$3,629	\$26,055	\$1,313,482	13.8	13.3
Michigan Non-MSA 2019	\$354,801	\$41,516	\$1,261				
Total	\$6,817,172	\$2,078,340	\$19,025	\$595,342	\$9,509,879	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

HNB ranked sixth in deposits out of 40 depository institutions (top 15 percent), with a 5.8 percent market share in the AA. In overall HMDA lending, HNB ranked fourth out of 614 lenders (top 1 percent) with a 4.4 percent market share. The top three lenders in this market include Quicken Loans Inc. with a 9.5 percent market share, JPMorgan Chase Bank, N.A. with a 6.4 percent market share, and Wells Fargo Bank, N.A. with a 4.8 percent market share.

For small loans to businesses, HNB ranked eighth out of 158 lenders (top 6 percent) with a market share of 3.2 percent. The top three lenders in terms of market share were American Express National Bank with a 20.7 percent market share, Chase Bank USA, N.A. with an 18.2 percent market share, and Citibank, N.A. with a 11.6 percent market share. All three of these lenders issue significant numbers of small business credit cards as a primary business.

For small loans to farms, HNB ranked fourth out of 19 lenders (top 22.0 percent), with a market share of 9.6 percent. The top three lenders were Chase Bank USA, N.A. with a market share of 30.1 percent, John Deere Financial, F.S.B. with a market share of 18.6 percent, and U.S. Bank, N.A. with a 13.6 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good.

- For 2017 – 2019, the proportion of home mortgage loans in low-income geographies was well below the proportion of OOU's but exceeded the aggregate distribution of loans in those geographies.
- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies was near-to the proportion of OOU's and exceeded the aggregate distribution of loans in those geographies.
- For 2016, the bank's geographic distribution of home mortgage loans was consistent with the bank's geographic distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

- For 2017 – 2019, the proportion of small business loans in low-income geographies approximated the proportion of small businesses located in those geographies but exceeded the aggregate distribution of loans to small businesses in those geographies.
- For 2017- 2019, the proportion of small business loans in moderate-income geographies exceeded both the proportion of small businesses located in those geographies and the aggregate distribution of loans to small businesses in those geographies.
- For 2016, the bank's geographic distribution of small loans to businesses was consistent with the bank's geographic distribution of small loans to businesses for 2017 – 2019.

Small Loans to Farms

Refer to Table S in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was adequate considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, the proportion of small loans to farms loans in low-income geographies was significantly below the proportion of small farms located in those geographies but exceeded the aggregate distribution of loans to small farms in those geographies.

- For 2017 – 2019, the proportion of small loans to farms in moderate-income geographies was well below both the proportion of small farms located in those geographies and the aggregate distribution of loans to small farms in those geographies.
- For 2016, the bank did not make enough loans to complete a meaningful analysis.

Lending Gap Analysis

The OCC analyzed HNB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but exceeded the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.
- For 2016, the bank's borrower distribution of home mortgage loans was consistent with the bank's borrower distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

Refer to Table R in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

- For 2017 – 2019, the percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of small businesses in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank's borrower distribution of small loans to businesses with revenues of \$1 million or less was consistent with the bank's distribution of small loans to businesses for 2017 – 2019.

Small Loans to Farms

Refer to Table T in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was good considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, the percentage of small loans to farms with revenues of \$1 million or less was below the percentage of small farms in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank did not make enough small loans to farms to complete a meaningful analysis.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Detroit MSA AA was excellent. HNB made 56 CD loans for a total of \$325.3 million, which represented 31.3 percent of tier 1 capital allocated to the AA. The bank utilized complex CD loans, often in a leadership position. The bank made 17 CD loans totaling \$198.6 million with the primary purpose of revitalization and stabilization of the AA. HNB made 10 CD loans totaling \$25.1 million for economic development of LMI neighborhoods. The bank made two loans totaling \$13.6 million for the purpose of affordable housing, creating 215 units for LMI individuals and families. HNB made 27 loans totaling \$88.0 million to organizations providing community services to LMI individuals. The loans were responsive to the identified needs for affordable housing and community revitalization and stabilization.

Examples include:

- HNB provided a \$12.4 million complex construction loan to an affordable community housing network to rehabilitate and build 60 LIHTC apartment units targeted to those with special needs.
- HNB refinanced an \$1.2 million mortgage originally used to construct a new affordable housing project consisting of 155 fully furnished, one-bedroom apartments for formerly homeless adults. The nonprofit owner provides onsite mental health, addiction treatment, intensive case management, financial literacy, nutrition classes and other on-site support, and offers a healthcare clinic in the building for residents and community use.
- HNB made a \$40.0 million construction loan as part of a complex \$75 million loan syndication, for which HNB was the lead agent. The loan financed the construction of a mixed-use office, retail, and outdoor event area located in downtown Detroit, Michigan. The property was in a low-income geography and was part of efforts to revitalize the area. The property was part of a \$200 million project targeted to attract new businesses and residents and create over 8,000 construction-related jobs and over 1,000 permanent jobs when complete.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

HNB worked with local community leaders to develop the “Detroit Home Mortgage” (DHM) specialized lending program. The DHM program offers a fixed-rate product for the purchase, renovation, or refinance of a residential owner-occupied property located in the City of Detroit, Michigan. This program addressed a specific need for neighborhoods challenged by appraisal value gaps. The DHM allows borrowers to obtain two mortgages at the same time; the first mortgage to purchase the home, and a second mortgage up to \$75,000 for property renovations. The DHM program finances renovation costs despite low appraisal values, provided the combined loan-to-value of both mortgages does not exceed 150 percent. The DHM program includes required courses for potential borrowers in financial responsibility, improving a credit score, and basic home maintenance. During the evaluation period, HNB originated 190 DHM loans totaling over \$14.3 million that resulted in positive changes in the targeted neighborhoods.

Under the bank’s *Community Access Mortgage* program, the bank funded 39 first-time homebuyer mortgages totaling \$3.2 million. Under the *HomeTown Mortgage* loan program, the bank funded 27 first-time homebuyer mortgages totaling \$2.5 million. The bank also made 211 unsecured home improvement loans totaling \$1.8 million and 963 loans under the *Debt Manager* program totaling \$10.9 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Battle Creek MSA, Bay City MSA, Flint MSA, Grand Rapids MSA, Jackson MSA, Kalamazoo MSA, Lansing MSA, Midland MSA, Muskegon MSA, Niles MSA, Saginaw MSA, and the Michigan Non-MSA AAs was consistent with the overall performance under the Lending Test in the full-scope area. Performance in the Ann Arbor MSA, was weaker than the bank’s overall performance under the Lending Test in the full-scope area due to lower levels of CD lending activity. Performance in the Monroe MSA was weaker than the bank’s overall performance under the Lending Test in the full-scope area due to poorer geographic distributions and lower levels of CD lending activity. Performance in the South Bend MSA was weaker than the bank’s overall performance under the Lending Test in the full-scope area due to poorer borrower distributions and lower levels of CD lending activity. Performance in these limited-scope AAs did not affect the bank’s overall rating for the state of Michigan.

Refer to Tables O through T in the state of 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 High Satisfactory. The weaker combined Investment Test performance in the limited-scope AAs negatively affected the bank’s overall Investment Test rating for the state of Michigan.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit MSA AA was excellent.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Detroit MSA	17	13,307	253	99,236	270	33.8	112,543	50.1	3	17,477
Limited-Scope										
Ann Arbor MSA	2	4	14	282	16	2.0	286	0.1	0	0
Battle Creek MSA	2	14	4	14	6	0.8	28	0.0	0	0
Bay City MSA	0	0	10	47	10	1.3	47	0.0	0	0
Flint MSA	3	22	57	11,623	60	7.5	11,645	5.2	0	0
Grand Rapids MSA	20	4,838	147	48,491	167	20.9	53,329	23.7	1	15
Jackson MSA	4	17	12	423	16	2.0	440	0.2	0	0
Kalamazoo MSA	5	1,137	22	608	27	3.4	1,745	0.8	0	0
Lansing MSA	4	12	35	2,221	39	4.9	2,233	1.0	0	0
Midland MSA	0	0	14	145	14	1.8	145	0.1	0	0
Monroe MSA	1	48	8	3,477	9	1.1	3,525	1.6	0	0
Muskegon MSA	1	222	13	37	14	1.8	259	0.1	0	0
Niles MSA	1	0	6	4	7	0.9	5	0.0	0	0
Saginaw MSA	2	11	24	62	26	3.3	73	0.0	0	0
South Bend MSA	3	10	4	3	7	0.9	13	0.0	0	0
Non-MSA Michigan	10	1,115	100	37,260	110	13.8	38,375	17.1	0	0
Total	75	20,757	723	203,933	798	100.0	224,691	100.0	4	17,492

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

*** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 10.8 percent of tier 1 capital allocated to the AA. This did not include unfunded commitments, which was an additional 1.7 percent of allocated capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution made extensive use of innovative and/or complex investments to support CD initiatives. The bank made five single investor LIHTC project investments for \$20.4 million and invested in 15 LIHTC syndications totaling \$35.1 million. HNB made the majority of its current period grants and donations of \$1.6 million to community service organizations that provided services to LMI individuals, primarily through providing affordable housing.

Examples of CD investments made in the AA include:

- HNB invested \$6.9 million in a LIHTC fund; the proceeds funded a rehabilitation and senior housing development property located in Oak Park, Michigan. The development consisted of 100

low-income housing apartment units. HUD subsidizes the rents and residents generally pay no more than 30 percent of their gross annual income.

- HNB acted as Trustee and invested \$41.3 million in a northern Detroit suburb school district to finance the school's day-to-day expenses until the school's grants, bonds, tax dollars, state aid revenue, and other financing became available. The school district evidenced students eligible for free/reduced lunches at between 73.0 percent and 82.2 percent of the student body.
- HNB invested \$18.0 million to a new investment fund to revitalize Detroit, Michigan neighborhoods. The revitalization program prompted construction and landscaping training in Detroit neighborhoods, and trained potential borrowers how to cure credit problems, create a budget, maintain home repairs, and apply for and obtain a residential mortgage. Homes in the Detroit MSA often held low appraisal values and the program allowed homeowners to improve properties, obtain affordable mortgages, and contribute to neighborhood revitalization.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Grand Rapids MSA, Kalamazoo MSA and the Michigan Non-MSA AAs was consistent with the bank's overall performance in the Investment Test in the full-scope areas. Performance in the Ann Arbor MSA, Battle Creek MSA, Bay City MSA, Flint MSA, Jackson MSA, Kalamazoo MSA, Lansing MSA, Midland MSA, Monroe MSA, Muskegon MSA, Niles MSA, Saginaw MSA, and South Bend MSA AAs was weaker than the bank's overall performance in the Investment Test in the full scope area due to lower levels of qualified investments. The weaker combined investment test performance in the limited-scope AAs negatively affected the bank's overall investment test rating for the state of Michigan.

SERVICE TEST

The bank's performance under the Service Test in Michigan is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit MSA AA was good.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Detroit MSA	49.2	108	37.6	6.5	24.1	36.1	33.3	10.2	24.1	33.8	31.6
Limited-Scope											
Ann Arbor MSA	1.6	8	2.8	0.0	25.0	50.0	0.0	14.9	12.9	40.2	27.6
Battle Creek MSA	0.1	2	0.7	0.0	0.0	0.0	100.0	7.4	26.5	39.2	26.9

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Bay City MSA	1.0	3	1.0	0.0	66.7	0.0	33.3	1.2	22.1	48.6	28.1
Flint MSA	6.8	18	6.3	16.7	16.7	55.6	11.1	11.9	18.3	36.4	33.5
Grand Rapids MSA	14.9	40	13.9	0.0	5.0	67.5	27.5	4.9	20.3	48.6	26.1
Jackson MSA	13.3	6	2.1	0.0	50.0	50.0	0.0	9.9	19.4	47.4	20.1
Kalamazoo MSA	1.7	5	1.7	0.0	20.0	80.0	0.0	8.0	12.3	52.9	25.2
Lansing MSA	0.6	19	6.6	5.3	5.3	52.6	31.6	5.5	19.6	39.7	31.1
Midland MSA	3.3	2	0.7	0.0	50.0	0.0	50.0	3.3	19.2	42.2	35.3
Monroe MSA	0.5	4	1.4	0.0	25.0	75.0	0.0	1.1	13.3	72.3	13.4
Muskegon MSA	2.2	5	1.7	0.0	20.0	20.0	60.0	11.1	23.1	37.6	28.2
Niles MSA	1.2	1	0.3	0.0	0.0	100.0	0.0	11.2	15.3	46.5	27.1
Saginaw MSA	0.3	9	3.1	0.0	22.2	44.4	33.3	11.2	12.5	50.5	25.8
Non-MSA Michigan	3.2	57	19.9	0.0	17.5	52.6	29.8	0.3	11.9	68.8	18.1

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below, and in moderate-income geographies equaled, the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 148 ATMs in the AA, of which 136 were deposit-taking.

Distribution of Branch Openings/Closings*						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Detroit MSA	10	20	0	-2	-3	-5
Limited-Scope						
Ann Arbor MSA	0	2	-1	0	-1	0
Battle Creek MSA	0	1	0	-1	0	0

Distribution of Branch Openings/Closings*						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Bay City MSA	0	3	0	-2	0	-1
Flint MSA	1	9	0	-3	-3	-2
Grand Rapids MSA	1	1	0	0	0	0
Jackson MSA	0	1	0	-1	0	0
Kalamazoo MSA	0	2	0	-1	-1	0
Lansing MSA	1	3	0	0	-3	0
Midland MSA	0	0	0	0	0	0
Monroe MSA	0	3	0	0	-3	0
Muskegon MSA	1	2	0	-1	-1	1
Niles MSA	0	0	0	0	0	0
Saginaw MSA	0	7	-2	-1	-2	-2
Non-MSA Michigan	5	30	1	-4	-19	-3

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed 20 branches, one in a low-income geography and six in moderate-income geographies. The bank opened 10 branches, one in a low-income geography and four in moderate-income geographies. The branch realignment was the result of duplicative branch locations from the FirstMerit merger and low utilization of the branches.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the AA, particularly LMI geographies and/or individuals. Branches were open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm, and Saturday from 9:00 am to 12:00 pm. Of the 73 stand-alone branches, 63 have drive-through facilities open the same hours as the lobbies. Additionally, 35 branch locations are within large regional chain grocery stores in the Detroit MSA AA, with four located in low-income geographies and 10 in moderate-income geographies. Grocery store branch hours are Monday through Friday 10:00 am to 7:00 pm and Saturday and Sunday 10:00 am to 3:00 pm.

Community Development Services

The institution provided a significant level of CD services. Employees supplied financial or job-specific expertise and/or technical assistance for 1,028 CD service activities to 75 organizations, providing 5,603 qualified hours within this AA. The majority of the bank's assistance, 3,246 hours, was to organizations that provided community services to LMI individuals and families, including financial literacy and first-time homebuyer education. Employees also served on the boards of director for 17 nonprofit organizations providing 954 hours of assistance. Assistance provided by the bank was responsive to identified needs in the AA, particularly with financial education and homebuyer counseling and education for LMI individuals and families.

The following are examples of CD services provided in this AA:

- One HNB employee served as a board member for an affordable housing arm of a nonprofit focused on community revitalization and the promotion of homeownership and commercial development. The organization offers various programs and services to LMI individuals, including affordable rental housing units and permanent supportive housing for homeless veterans.
- Three HNB employees worked with a community development partnership that contributes capital, provides affordable housing, creates jobs, and provides economic development opportunities to underserved communities. The partnership helps address the appraisal value gap associated with the renovation of properties by combining a second mortgage with a conventional first mortgage to assist the financing of rehabilitated single-family properties. Employees facilitated multiple homebuyer education classes to LMI individuals to achieve the path to homeownership.
- An HNB employee served as a member of a loan advisory board to review and approve loans to small businesses that do not qualify for traditional bank financing. The advisory board was part of a statewide women's foundation that provides loans and resources to LMI individuals, including minority and women-owned businesses. More than 51 percent of the foundation's clients qualify as LMI persons.

Conclusions for Areas Receiving Limited-scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Ann Arbor MSA, Bay City MSA, Jackson MSA, Kalamazoo MSA, Midland MSA, Monroe MSA, Saginaw MSA, and the Michigan Non-MSA AAs was consistent with HNB's overall performance under the Service Test in the full-scope area. The bank's performance in the Flint MSA AA was stronger than the bank's overall performance under the Service test in the full-scope area due to better branch distributions in both low- and moderate-income geographies. The bank's performance in the Battle Creek MSA, Grand Rapids MSA, and Niles MSA AAs was weaker than the overall performance under the Service test in the full-scope area due to poorer branch distributions in both low- and moderate-income geographies. The bank's performance in the Lansing MSA AA was weaker than the overall performance under the Service Test in the full-scope area due to weaker branch distribution in moderate-income geographies. The bank's performance in the Muskegon MSA AA was weaker than the overall performance under the Service Test in the full-scope area due to weaker branch distribution in low-income geographies. The institution's performance under the Service Test in the limited-scope areas had a neutral impact on the overall Service Test rating for the state of Michigan.

State of Ohio

CRA rating for the State of Ohio⁶: 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:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution and borrower distribution of the bank's originations and purchases of home mortgage loans, small loans to businesses, and small loans to farms were good.
- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.
- CD services were effective and responsive in addressing community needs. The bank provided a significant level of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Ohio

HNB delineated 10 AAs within Ohio including the entirety or portions of the Akron, OH (Akron) MSA; Canton-Massillon, OH (Canton) MSA; Cleveland-Elyria, OH (Cleveland) MSA; Columbus, OH (Columbus) MSA; Dayton, OH (Dayton) MSA; Lima, OH (Lima) MSA; Mansfield, OH (Mansfield) MSA; Springfield, OH (Springfield) MSA; Toledo, OH (Toledo) MSA; and 27 non-MSA counties (Ohio Non-MSA) which examiners combined as one AA for analysis and presentation. Refer to appendix A for a list of counties reviewed within each AA.

Ohio represented the bank's largest rated area by deposits. Based on June 30, 2019, FDIC summary of deposit information, HNB had \$48.4 billion of deposits in Ohio, which represented 57.8 percent of the bank's overall deposits. The bank originated and purchased \$16.3 billion in loans or 44.5 percent of total bank loan originations and purchases during the evaluation period. The bank's primary loan products in Ohio were home mortgage loans and small loans to businesses.

HNB operated 386 branches, representing 42.5 percent of the bank's branches, and 741 ATMs, of which 545 were deposit-taking. HNB ranked first out of 149 depository institutions with a 22.9 percent deposit market share. The second and third positioned banks in the AA in terms of deposits included JPMorgan Chase Bank, N.A. with a 12.0 market share and KeyBank, N.A. with an 11.1 market share.

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.

Akron MSA

The following table provides a summary of the demographics, including housing and business information for the Akron MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Akron MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	170	17.6	20.0	40.0	22.4	0.0
Population by Geography	703,744	11.4	19.7	41.7	27.2	0.0
Housing Units by Geography	313,134	11.7	20.9	42.1	25.2	0.0
Owner-Occupied Units by Geography	188,352	5.7	17.7	44.9	31.7	0.0
Occupied Rental Units by Geography	93,605	20.5	26.1	37.8	15.6	0.0
Vacant Units by Geography	31,177	21.5	25.1	38.7	14.7	0.0
Businesses by Geography	48,217	10.2	15.0	37.2	37.5	0.0
Farms by Geography	1,377	4.4	10.2	52.4	33.0	0.0
Family Distribution by Income Level	178,180	21.4	16.9	20.8	40.9	0.0
Household Distribution by Income Level	281,957	24.8	15.7	17.7	41.8	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$137,715
			Median Gross Rent			\$779
			Families Below Poverty Level			10.6%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The Akron MSA AA consisted of both counties in the MSA. According to the FDIC's Summary of Deposits as of June 30, 2019, HNB's deposits in the AA comprised 5.1 percent of the bank's total deposits, making this AA the bank's fourth largest in terms of deposits held.

HNB had \$4.2 billion in deposits and ranked first among 27 depository institutions in the AA with a 28.4 percent market share. The second and third depository institutions in terms of deposit market shares were JPMorgan Chase Bank, N.A. with a 14.8 percent and PNC Bank, N.A. with a 12.5 percent. HNB operated 42 branches and 84 ATMs, of which 63 were deposit taking, in the AA.

Information from the October 2019 Moody's Analytics report indicated the Akron, Ohio economy's strengths included a cluster of tire and rubber research and development facilities, relatively low business and living costs, and a prime location for staffing business outsourcing and human resources support roles. The report indicated that Akron's economy continued to underperform all other Ohio populous metropolitan areas, as measured by year-ago growth in the Moody's Analytics Business Cycle index. Payroll employment was flat between 2015-2019, with recent job losses in the factory sector, professional business services, consumer industries and wholesale trade. The weakness in the labor market, particularly the loss of well-paying jobs, was evident in the wage data, with average hourly

earnings growth declining by nearly \$2 since the end of 2018. The labor force was near a multi-decade low as more working people leave the area. Housing market appreciation in recent quarters stemmed from the limited availability of single-family homes rather than robust homebuyer demand. However, longer-term competitive drivers for business services remained intact. Akron retained the lowest business costs of any major Ohio metropolitan area except Toledo and Cincinnati. Office space remained more than 30 percent less costly than the rest of the nation with a high vacancy rate in downtown Akron. Consequently, the long-term business services outlook remained optimistic.

Akron's major economic driver was healthcare services; this industry was projected to produce the largest job growth over the next decade because of higher demand from the aging population. The city's population aged 65 and over was above the 65 and older population percentages of both Ohio and the U.S. and projected to comprise more than 20 percent of Akron's total population by 2025. Healthcare providers boosted investments to keep pace with anticipated demand. One large healthcare facility expected to construct an in- and outpatient behavioral health facility, with completion in 2022. The investment will add to a recently completed \$200 million, seven-story patient tower. In addition, the local general medical center increased its hiring quota of registered nurses, healthcare technicians, and general physicians.

Based on information in the above table, low-income families earned less than \$32,858 and moderate-income families earned less than \$52,573. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$821 for low-income borrowers and \$1,324 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$739.

According to the U.S. BLS, the Akron MSA AA's unemployment rate mirrored the rest of the country and declined from 5.1 percent in 2016 to 4.3 percent in 2019, higher than the 4.2 percent for the state of Ohio and the U.S. low of 3.5 percent. The unemployment rate in the AA did not vary significantly from the overall State of Ohio, which averaged 5.2 percent in 2016, 4.5 percent in 2017, 4.6 percent in 2018, and 4.2 percent in 2019. Approximately 34 percent of the area households made less than \$40,000 annually, while about 28 percent made over \$100,000.

Information provided by two community contacts; a regional chapter of an international affordable housing charitable organization and a not-for-profit that assists Akron residents find safe and affordable banking and services identified the following needs within the Akron MSA AA:

- Rehabilitation loans to improve the current housing stock.
- Small, easily obtained cash loans to combat predatory lending by payday lenders.
- Lines of credit to assist small business cash flow.
- Quality rental housing.
- Economic development for job creation at living wages.
- Substance abuse programs.

Cleveland MSA

The following table provides a summary of the demographics, including housing and business information for the Cleveland MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cleveland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	638	18.5	23.0	32.1	24.5	1.9
Population by Geography	2,064,483	12.1	20.0	34.3	33.2	0.4
Housing Units by Geography	956,125	14.1	22.4	33.4	29.4	0.6
Owner-Occupied Units by Geography	552,981	6.5	16.2	37.9	39.2	0.2
Occupied Rental Units by Geography	294,627	22.5	31.0	29.2	16.0	1.2
Vacant Units by Geography	108,517	30.1	30.6	22.4	15.7	1.3
Businesses by Geography	150,156	8.2	16.2	33.0	41.9	0.8
Farms by Geography	3,794	3.7	11.6	40.1	44.5	0.1
Family Distribution by Income Level	521,209	22.8	16.7	19.3	41.2	0.0
Household Distribution by Income Level	847,608	25.9	15.3	16.6	42.2	0.0
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Median Housing Value			\$138,565
			Median Gross Rent			\$761
			Families Below Poverty Level			11.6%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The Cleveland MSA AA consisted of all five counties in the MSA. According to the FDIC's Summary of Deposits as of June 30, 2019, HNB's deposits in the AA comprised 12.9 percent of the bank's total deposits, making this AA the bank's second largest in terms of deposits held.

Within the Cleveland MSA AA, the bank had \$10.7 billion in deposits and ranked second among 33 depository institutions in the AA with a 14.9 percent market share. The first and third ranked depository institutions in terms of deposit market share were KeyBank, N.A. with 21.9 percent and PNC Bank, N.A. with 13.3 percent. HNB operated 115 branches and 212 ATMs, of which 154 were deposit taking, in the AA.

Information from the October 2019 Moody's Analytics report indicated the Cleveland MSA AA economy declined over the second and third quarters of 2019 and fell behind the economies of Cincinnati and Columbus. Payroll employment was at its highest level in 2018, bolstered by gains in durable goods manufacturing, professional and technical services, transportation, and consumer industries. Auto manufacturers and allied steel suppliers reduced jobs, as national vehicle sales have declined. Healthcare providers are adding most of the jobs over the short- and long-terms due to growing demand in the aging population.

Major economic drivers for the Cleveland MSA AA included education and healthcare services, professional and business services, government, and manufacturing. Key employers in the AA included Cleveland Clinic Foundation, University Hospitals, Progressive Corporation, Giant Eagle, and Metro Health System.

According to the U.S. BLS, the Cleveland MSA AA's unemployment rate mirrored the rest of the country and declined from 5.1 percent in 2016 to 4.4 percent in 2019, higher than the 4.2 percent for the State of Ohio and the U.S. low of 3.5 percent. The unemployment rate in the AA did not vary significantly from the overall state of Ohio, which averaged 5.2 percent in 2016, 4.5 percent in 2017, 4.6 percent in 2018, and 4.2 percent in 2019. The MSA posted a higher-than-average poverty level of 14.5 percent in 2018, and approximately 35 percent of households earned less than \$40,000 in gross annual income; only approximately 27 percent earned over \$100,000.

Based on information in the above table, low-income families earned less than \$32,911 and moderate-income families earned less than \$52,657. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$823 for low-income borrowers and \$1,316 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$744.

Information provided by four community contacts, three from community development corporations and one from a social services entity, identified the following needs within the Cleveland MSA AA:

- Affordable housing, workforce development, and small business development.
- Bank products and services, tailored for underbanked individuals, including entry-level transaction accounts.
- Credit repair products, secured credit cards, and small-dollar loan products.
- Financial literacy education and counseling.
- Rehabilitation loans, home equity loans, small business lending,
- Neighborhood revitalization/stabilization funding to low-income geographies.

Columbus MSA

The following table provides a summary of the demographics, including housing and business information for the Columbus MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Columbus MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	414	15.7	23.7	31.6	28.0	1.0
Population by Geography	1,872,440	10.3	21.6	34.1	33.2	0.9
Housing Units by Geography	791,535	11.9	22.9	33.7	31.3	0.2
Owner-Occupied Units by Geography	436,614	5.1	17.8	36.5	40.6	0.0
Occupied Rental Units by Geography	282,039	18.2	29.7	31.2	20.5	0.4

Table A – Demographic Information of the Assessment Area						
Assessment Area: Columbus MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Vacant Units by Geography	72,882	28.5	27.2	26.2	17.5	0.6
Businesses by Geography	137,932	9.2	17.5	30.3	42.4	0.5
Farms by Geography	4,110	4.5	14.5	44.1	36.8	0.1
Family Distribution by Income Level	453,530	21.8	16.8	19.4	41.9	0.0
Household Distribution by Income Level	718,653	23.9	16.3	17.2	42.7	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$162,519
			Median Gross Rent			\$846
			Families Below Poverty Level			10.5%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The Columbus MSA AA consisted of seven of the 10 counties in the MSA. According to the FDIC's Summary of Deposits as of June 30, 2019, HNB's deposits in the AA comprised 27.3 percent of the bank's total deposits, making this AA the bank's largest in terms of deposits held.

Within the Columbus MSA AA, the bank had \$22.8 billion in deposits and ranked first among 51 depository institutions in the AA with a 37.4 percent market share. The second and third depository ranked institutions in terms of deposit market share were JPMorgan Chase Bank, N.A. with 22.6 percent and PNC Bank, NA, with 9.5 percent. HNB operated 79 branches and 223 ATMs, of which 150 were deposit taking, in the AA.

Information from the October 2019 Moody's Analytics report indicated the Columbus MSA AA economy started to slow in 2019 but outperformed all other major Ohio metropolitan areas in the second and third quarter. Payroll employment significantly increased in the third quarter of 2019, driven by gains in professional and technical services, state and local government and transportation/utilities. Although average hourly earnings decreased below 2018 levels as new labor market entrants offered lower wages, the Columbus MSA AA labor force growth through September 2019 was the strongest in over two decades. Additionally, Columbus MSA AA house price appreciation increased 2.0 percentage points above the national average due to relatively strong housing demand.

Despite a cyclical slowdown expected in late 2020, professional, technical, and financial services are projected to thrive over the coming decade as the city's modest business costs (approximately 20 percent below the national average) and highly educated population attract white-collar firms. The Columbus MSA AA attracts international and domestic migrants who attend local universities and remain in the area after graduation. In 2018, 38 percent of the city's population held a bachelor's degree, ranking Columbus in the top quintile of Midwest metropolitan areas. A top private-sector employer sought to hire approximately 350 software engineers, marketers, wealth managers, data scientists, and accountants in Columbus and planned to increasingly shift its employee base from New York, NY to lower-cost areas like Columbus to streamline operations over the coming decade.

Economic strengths in Columbus included: good prospects for high tech and other knowledge-based industries; the stable presence of The Ohio State University; favorable migration patterns and age structure; a highly educated workforce; relatively low costs of living and doing business; and above-average house price growth. Weaknesses included a per capita income below the U.S. average and weak single-family residential construction.

Columbus metropolitan healthcare was projected to regain its status as the area's second largest source of employment, driven by robust demographic gains. The Columbus MSA AA's population growth measured twice the national average and eight times the State of Ohio average. The above average population gains created stronger demand for medical services, yielding bigger job gains in healthcare. The recent growth in state and local government will extend over the medium-term as state budgetary conditions remain sound and public-sector institutions expand. Specifically, the city of Columbus's status as the state's capital and the location of The Ohio State University remained strengths.

According to the U.S. BLS, the Columbus MSA AA's unemployment rate mirrored the rest of the country and declined from 4.2 percent in 2016 to 3.5 percent in 2019. The unemployment rate in the AA was well below the overall state of Ohio averages of 5.2 percent in 2016, 4.5 percent in 2017, 4.6 percent in 2018, and 4.2 in 2019 and equal to the national average.

Based on information in the above table, low-income families earned less than \$35,227 and moderate-income families earned less than \$56,363. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$823 for low-income borrowers and \$1,316 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$872.

Information provided by three community contacts from affordable housing organizations and from an OCC/FDIC-sponsored community listening session with community leaders from the Columbus MSA AA identified the following needs within the Columbus MSA AA:

- Affordable housing, in the form of quality rental housing and affordable homes for purchase.
- Financial education and counseling for individuals to repair credit, including how to avoid foreclosure and tax sales.
- Low-cost loans for construction financing.
- Mortgages and rehabilitation loans to repair and remodel the existing housing supply
- Grants to purchase LIHTCs
- Small business development and lending, including lines of credit.
- Workforce development.

Scope of Evaluation in Ohio

Since the state of Ohio was HNB's largest market, examiners selected three AA for full-scope reviews, the Akron MSA, Cleveland MSA, and the Columbus MSA AAs. The Columbus MSA AA had the largest percentage of deposits and reported loans within the state at 47.1 percent and 26.9 percent respectively. The percentages of deposits and reported loans in the Cleveland MMSA AA were 22.1 percent and 24.1 percent, respectively. The percentages of deposits and reported loans in the Akron

MSA AA were 8.7 percent and 10.9 percent, respectively. The Canton MSA, Dayton MSA, Lima MSA, Mansfield MSA, Springfield MSA, Toledo MSA, and the Ohio Non-MSA AAs received limited-scope reviews. Refer to appendix A for more information.

Examiners based the ratings on the results of the areas that received full-scope reviews and the bank's performance in the limited-scope areas, as applicable. The Columbus MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Ohio.

Examiners placed more emphasis on home mortgage loans versus small loans to businesses and small loans to farms in arriving at the overall conclusion. HMDA loans represented the majority of HNB's lending in all 10 AAs. HNB originated too few small loans to farms in the Lima MSA, Mansfield MSA, and the Springfield MSA AAs to conduct any meaningful analyses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

The bank's performance under the Lending Test in Ohio is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Akron MSA, Cleveland MSA, and Columbus MSA AAs was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans 2016 - 2019*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Akron MSA	10,014	3,669	45	49	13,777	10.9	8.7
Cleveland MSA	20,589	9,562	110	84	30,345	24.1	22.2
Columbus MSA	25,824	7,708	204	137	33,873	26.9	47.1
Limited-Scope:							
Canton MSA	7,154	1,923	41	19	9,137	7.3	5.8
Dayton MSA	3,518	1,681	39	15	5,253	4.2	1.6
Lima MSA	535	189	18	5	747	0.6	0.5
Mansfield MSA	796	250	3	3	1,052	0.8	0.3
Springfield MSA	754	308	26	10	1,098	0.9	0.6
Toledo MSA	7,975	1,977	55	17	10,024	8.0	5.3
Ohio Non-MSA	15,888	4,326	272	24	20,510	16.3	7.9
Total	93,047	31,593	813	363	125,819	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans 2016 - 2019* (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Akron MSA	\$1,191,525	\$374,711	\$3,137	\$100,806	\$1,670,179	9.5	8.7
Cleveland MSA	2,788,763	\$976,939	\$8,678	\$435,919	\$4,210,299	23.9	22.2
Columbus MSA	\$4,925,469	\$866,818	\$18,589	\$601,896	\$6,412,772	36.4	47.1
Limited-Scope:							
Canton MSA	\$833,252	\$168,307	\$2,340	\$62,146	\$1,066,045	6.0	5.8
Dayton MSA	\$506,152	\$192,369	\$4,361	\$30,375	\$733,257	4.2	1.6
Lima MSA	\$54,070	\$17,408	\$1,628	\$12,244	\$85,350	0.5	0.5
Mansfield MSA	\$74,212	\$19,926	\$233	\$1,227	\$95,598	0.5	0.3
Springfield MSA	\$73,709	\$36,608	\$2,696	\$17,387	\$130,400	0.7	0.6
Toledo MSA	\$923,079	\$214,471	\$3,849	\$28,815	\$1,170,214	6.6	5.3
Ohio Non-MSA AA	\$1,648,223	\$369,477	\$22,795	\$32,539	\$2,073,034	11.7	7.9
Total	\$13,018,454	\$3,237,034	\$68,306	\$1,323,354	\$17,647,148	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Akron MSA

HNB ranked first in deposits out of 27 depository institutions (top 4 percent) with a 28.4 percent market share in the AA. In overall HMDA lending, HNB ranked first out of 361 home mortgage lenders (top 1 percent) with a 16.8 percent market share. The second and third HMDA lenders in market share were Third Federal Savings and Loan with a 5.6 percent market share and Wells Fargo Bank, N.A. with a 5.0 percent market share.

For small loans to businesses, HNB ranked fourth out of 103 small business lenders (top 4 percent) with a 10.5 percent market share. The top three lenders of small loans to businesses in market share were Chase Bank USA, NA., with a 17.7 percent market share, American Express National Bank with a 15.9 percent market share and PNC Bank, N.A. with a 11.8 percent market share.

For small loans to farms, HNB ranked third out of 11 small farm lenders (top 28 percent) with a 17.4 percent market share. The top two lenders of small loans to farms were Chase Bank USA, NA, with a 27.2 percent market share, and Farmers National Bank with a 22.8 percent market share.

Cleveland MSA

HNB ranked second in deposits out of 33 depository institutions (top 7 percent) with a 14.9 percent market share in the AA. In overall HMDA lending, HNB ranked first out of 480 home mortgage lenders (top 1 percent) with a 11.9 percent market share. The second and third ranked HMDA lenders in market share were Third Federal Savings and Loan with a 10.2 percent market share and Wells Fargo Bank, N.A. with a 5.0 percent market share.

For small loans to businesses, HNB ranked fourth out of 124 small business lenders (top 4 percent) with an 8.5 percent market share. The top three lenders of small loans to businesses in market share were American Express National Bank with an 18.1 percent market share, Chase Bank USA, NA., with a 16.3 percent market share, and PNC Bank, N.A. with an 11.4 percent market share.

For small loans to farms, HNB ranked third out of 17 small farm lenders (top 18 percent) with a 21.0 percent market share. The top two lenders of small loans to farms were Farmers National Bank with a 21.9 percent market share and Chase Bank USA, N.A. with a 21.4 percent market share.

Columbus MSA

HNB ranked first in deposits out of 51 depository institutions (top 2 percent) with a 37.4 percent market share in the AA. In overall HMDA lending, HNB ranked first out of 538 home mortgage lenders (top 1 percent) with a 12.5 percent market share. The second and third ranked HMDA lenders in market share were JPMorgan Chase Bank, N.A. with a 6.1 percent market share and Wells Fargo Bank, N.A. with a 5.0 percent market share.

For small loans to businesses, HNB ranked fourth out of 138 small business lenders (top 3 percent) with a 7.4 percent market share. The top three lenders of small loans to businesses in market share were Chase Bank USA, NA., with a 24.6 percent market share, American Express National Bank with a 15.1 percent market share, and PNC Bank, N.A. with a 13.2 percent market share.

For small loans to farms, HNB ranked third out of 23 small farm lenders (top 14 percent) with a 14.4 percent market share. The top two lenders of small loans to farms were Chase Bank USA, NA, with a 21.8 percent market share and John Deere Financial, FSB with 20.3 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited good geographic distribution of loans in its AAs.

Akron MSA

Home Mortgage Loans

Refer to Table O in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

- For 2017 – 2019, the proportion of home mortgage loans in low-income geographies was below the proportion of OOU's but exceeded the aggregate distribution of loans in those geographies.
- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies approximated the proportion of OOU's and exceeded the aggregate distribution of loans in those geographies.
- For 2016, the bank's geographic distribution of home mortgage loans was consistent with the bank's geographic distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good.

- For 2017 – 2019, the proportion of small business loans in low-income geographies was below the proportion of small businesses located in those geographies and near-to the aggregate distribution of loans to small businesses in those geographies.
- For 2017- 2019, the proportion of small business loans in moderate-income approximated the proportion of small businesses located in those geographies and exceeded the aggregate distribution of loans to small businesses in those geographies.
- For 2016, the bank’s geographic distribution of small loans to businesses was weaker than the bank’s geographic distribution of small loans to businesses for 2017 – 2019 due to lower lending penetration in low-income geographies.

Small Loans to Farms

Refer to Table S in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was adequate considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, HNB did not make any small loans to farms in low-income geographies. The proportion of small loans to farms in moderate-income geographies was significantly below the proportion of small farms located in those geographies but approximated the aggregate distribution of loans to small farms in those geographies.
- For 2016, the bank did not make enough small loans to farms to complete a meaningful analysis.

Cleveland MSA

Home Mortgage Loans

Refer to Table O in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good.

- For 2017 – 2019, the proportion of home mortgage loans in low-income geographies was below the proportion of OOU’s but approximated the aggregate distribution of loans in those geographies.
- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies in 2017 – 2019 was below the proportion of OOU’s but near-to the aggregate distribution of loans in those geographies.
- For 2016, the bank’s geographic distribution of home mortgage loans was consistent with the bank’s geographic distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good.

- In 2017 – 2019, the proportion of small business loans in both low- and moderate-income geographies was below the proportion of small businesses located in those geographies but near-to the aggregate distribution of loans to small businesses in those geographies.
- For 2016, the bank’s geographic distribution of small loans to businesses was stronger than bank’s geographic distribution of small loans to businesses for 2017 – 2019 due to higher lending penetrations in both low- and moderate-income geographies.

Small Loans to Farms

Refer to Table S in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was adequate considering that small farm lending was not a primary focus for the bank.

- In 2017 – 2019, the proportion of small farm loans in low-income geographies was significantly below the small proportion of farms located in those geographies but exceeded the aggregate distribution of loans to farms in those geographies.
- In 2017 – 2019, the proportion of small farm loans in moderate-income geographies in 2017 – 2019 was well below the proportion of farms located in those geographies but exceeded the aggregate distribution of loans to farms in those geographies.
- For 2016, the bank’s geographic distribution of small loans to farms was stronger than the bank’s geographic distribution of small loans to businesses for 2017 – 2019 due to higher lending penetration in moderate-income geographies.

Columbus MSA

Home Mortgage Loans

Refer to Table O in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good

- For 2017 – 2019, the proportion of home mortgage loans in low-income geographies was below the proportion of OOUs but approximated the aggregate distribution of loans in those geographies.
- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies was below the proportion of OOUs but near-to aggregate distribution of loans in those geographies.
- In 2016, geographic distribution of home mortgage loans was consistent with the bank’s geographic distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was adequate.

- For 2017 – 2019, the proportion of small business loans in low-income geographies was below the proportion of small businesses located in those geographies and well below the aggregate distribution of loans to small businesses in those geographies.
- For 2017 – 2019, the proportion of small business loans in moderate-income geographies was below the proportion of small businesses and near-to the aggregate distribution of loans to small businesses in those geographies.
- For 2016, the bank’s geographic distribution of small loans to businesses was stronger than the bank’s geographic distribution of small loans to businesses for 2017 – 2019 due to both higher lending penetrations and aggregate performance in low-income geographies.

Small Loans to Farms

Refer to Table S in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was adequate considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, the proportion of small farm loans in low-income geographies was significantly below the proportion of farms located in those geographies but exceeded the aggregate distribution of loans to small farms in those geographies.
- For 2017 – 2019, the proportion of small farm loans in moderate-income geographies was significantly below the proportion of farms but well below the aggregate distribution of loans to small farms in those geographies.
- For 2016, the bank’s geographic distribution of small loans to farms was stronger than the bank’s geographic distribution of small loans to farms for 2017 – 2019 due to higher lending penetration and aggregate performance in low-income geographies.

Lending Gap Analysis

The OCC analyzed HNB’s geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the institution.

Akron MSA

Home Mortgage Loans

Refer to Table P in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.
- For 2016, the bank's borrower distribution of home mortgage loans was consistent with the bank's borrower distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good.

- For 2017-2019, the percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate distribution.
- For 2016, the bank's borrower distribution of small loans to businesses with revenues of \$1 million or less was consistent with the bank's distribution of small loans to businesses for 2017 – 2019.

Small Loans to Farms

Refer to Table T in the State of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was good considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, the percentage of small loans to with revenues of \$1 million or less was near-to the percentage of small farms in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank did not make enough small loans to farms to complete a meaningful analysis.

Cleveland MSA

Home Mortgage Loans

Refer to Table P in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate distribution of all reporting lenders in the AA.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.
- For 2016, the bank's borrower distribution of home mortgage loans was consistent with the bank's borrower distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good.

- For 2017-2019, the percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate distribution.
- For 2016, the bank's borrower distribution of small loans to businesses with revenues of \$1 million or less was consistent with the bank's distribution of small loans to businesses for 2017 – 2019.

Small Loans to Farms

Refer to Table T in the State of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was good considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, the percentage of small loans to with revenues of \$1 million or less was near-to the percentage of small farms in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the percentage of small loans to with revenues of \$1 million or less was consistent with the bank's distribution of small loans to farms for 2017 – 2019.

Columbus MSA

Home Mortgage Loans

Refer to Table P in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but equaled the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA and approximated the aggregate distribution of all reporting lenders in the AA.

- For 2016, the bank's borrower distribution of home mortgage loans was consistent with the bank's borrower distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good.

- For 2017-2019, the percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate distribution.
- For 2016, the bank's borrower distribution of small loans to businesses with revenues of \$1 million or less was consistent with the bank's distribution of small loans to businesses for 2017 – 2019.

Small Loans to Farms

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

The distribution of loans to farms of different sizes was good considering that small farm lending was not a primary focus for the bank.

- For 2017 – 2019, the percentage of small loans to with revenues of \$1 million or less was below the percentage of small farms in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the percentage of small loans to with revenues of \$1 million or less was consistent with the bank's distribution of small loans to farms for 2017 – 2019.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion for all three full-scope AAs.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Akron MSA

The level of CD lending was excellent. HNB made 49 CD loans for a total of \$100.8 million, which represented 19.3 percent of allocated tier 1 capital. The bank made significant use of innovative and complex CD loans for community service to assist LMI individuals. HNB originated eight CD loans totaling \$28.6 million, to provide 400 affordable housing units plus three single family residences to LMI individuals and families and three retail spaces in LMI neighborhoods. The loans were responsive to the identified needs for affordable housing and to revitalize and stabilize the community. The bank made 10 loans totaling \$40.9 million to revitalize, stabilize, and develop LMI neighborhoods.

Additionally, the bank extended 31 loans totaling \$34.4 million to organizations providing community services to LMI individuals.

Examples of CD loans in the AA include:

- HNB provided a complex \$3.12 million loan to acquire an 80-unit section 8, multi-family housing complex operating with a Housing Assistance Program contract from HUD. The location of the senior age-restricted project was in a middle-income geography in Stow, Ohio.
- In April 2017, HNB renewed a \$4.5 million complex construction loan for a project that benefited from New Market Tax Credits. The loan funded construction of a retail plaza in a low-income Akron neighborhood. Tenants in the project includes a grocery store, which the neighborhood lacked, that was highly responsive to the needs in the community and an innovative rehabilitation of the neighborhood. Other planned tenants included a dental service provider that will primarily serve the LMI residents in the neighborhood.

Cleveland MSA

The level of CD lending in the Cleveland MSA AA was excellent. HNB made 84 CD loans for a total of \$435.9 million, which represented 32.4 percent of allocated tier 1 capital. The bank made significant use of innovative and/or complex CD loans for several complex projects where the bank often acted in a leadership role. The bank made 28 CD loans totaling \$269.1 million with the primary purpose of revitalization and stabilization of the AA. The bank made six loans totaling \$16.4 million for the purpose of affordable housing, creating over 225 affordable units. The bank made 39 loans totaling \$109.0 million, to organizations providing community services to LMI individuals. Additionally, the bank made 11 loans totaling \$38.2 million to support economic development.

Examples of CD loans in the AA include:

- HNB was the agent bank for three complex syndicated loans where HNB retained \$26.7 million to refinance and construct a 19-story, 187-unit apartment tower, with street-level retail space in the downtown Cleveland area. The project expected to create approximately 92 permanent retail jobs and was consistent with citywide plan to revitalize the downtown area.
- HNB refinanced a seven-year term complex participation loan where HNB retained \$11.4 million used to acquire and improve multi-tenant office and industrial space plus an office tower in a moderate-income geography. HNB also participated in a subsequent seven-year construction-to-permanent loan where HNB retained \$18.6 million for capital and tenant improvements related to a major tenant and employer. The project, located in the westside Community Reinvestment Area in a moderate-income geography, was expected to revitalize and stabilize this area by attracting businesses and providing jobs to LMI area residents.
- HNB provided a \$13.3 million construction loan to build 70 additional multi-family units and retail space for an existing project located in a low-income geography. This project was part of a citywide revitalization plan to attracting and retaining businesses and residents.

Columbus MSA

The level of CD lending in the Columbus AA was excellent. HNB made 137 CD loans in its AA for a total of \$601.9 million, which represented 21.3 percent of allocated tier 1 capital. The bank made use of innovative and complex CD loans to assist LMI individuals with affordable housing and revitalization, economic development, and community services. The bank made 13 CD loans totaling \$138.7 million

with the primary purpose of revitalization and stabilization of the AA. HNB made 17 CD loans totaling \$185.8 million for economic development of LMI neighborhoods. The bank made 26 loans totaling \$129.4 million for the purpose of affordable housing, creating 740 units for LMI individuals and families. The greatest number of loans, 81 totaling \$148.0 million, the bank made to organizations providing community services to LMI individuals. The loans were responsive to the identified needs for affordable housing and to revitalize and stabilize the community.

Examples of CD loans in the AA include:

- HNB made a \$6.3 million complex construction loan to a nonprofit to build a new 64-unit senior LIHTC housing facility in Whitehall, Ohio.
- HNB originated the \$10.6 million direct purchase of a complex tax-exempt Ohio Housing Finance Agency bond issuance to fund the rehabilitation of 160 units at a LIHTC project in Dublin, Ohio.
- HNB made two construction loans totaling \$9.7 million to convert a former high school into a 49-unit LIHTC senior housing facility in Circleville, Ohio.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Akron MSA

Under the bank's *Community Access Mortgage* program, the bank funded four first-time homebuyer mortgages totaling \$214,000. Under the *HomeTown Mortgage* loan program, the bank funded 238 first-time homebuyer mortgages totaling \$24.6 million. The bank also made 151 unsecured home improvement loans totaling \$1.2 million, and 780 loans under the *Debt Manager* program totaling \$9.1 million.

Cleveland MSA

Under the bank's *Community Access Mortgage* program, the bank funded 20 first-time homebuyer mortgages totaling \$1.6 million. Under the *HomeTown Mortgage* loan program, the bank funded 272 first-time homebuyer mortgages totaling \$31.6 million. The bank also made 362 unsecured home improvement loans totaling \$2.9 million, and 1,659 loans under the *Debt Manager* program totaling \$9.0 million.

Columbus MSA

Under the bank's *Community Access Mortgage* program, the bank funded 33 first-time homebuyer mortgages totaling \$3.3 million. Under the *HomeTown Mortgage* loan program, the bank funded 102 first-time homebuyer mortgages totaling \$17.4 million. The bank also made 198 unsecured home improvement loans totaling \$1.7 million, and 1,041 loans under the *Debt Manager* program totaling \$12.4 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Canton MSA, Dayton MSA, Lima MSA, Mansfield MSA, Springfield MSA, Toledo MSA, and the Ohio Non-MSA AAs was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through T in the state of Ohio section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Ohio is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Akron MSA and Columbus MSA AAs was excellent. The bank's performance in the Cleveland MSA AA was good.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Akron MSA	11	3,628	146	47,744	157	13.9	51,372	8.7	10	2,624
Cleveland MSA	24	8,367	192	84,406	216	19.1	92,773	15.7	11	3,809
Columbus MSA	28	14,991	289	224,973	317	28.1	239,964	40.7	12	5,443
Limited-Scope										
Canton MSA	9	1,367	94	27,604	103	9.1	28,971	4.9	6	605
Dayton MSA	11	1,431	61	14,766	72	6.4	16,197	2.7	11	2,025
Lima MSA	1	11	12	4,665	13	1.2	4,676	0.8	1	83
Mansfield MSA	5	116	7	418	12	1.1	534	0.1	4	215
Springfield MSA	5	476	32	5,053	37	3.3	5,529	0.9	4	776
Toledo MSA	12	2,661	83	110,578	95	8.4	113,239	19.2	9	687
Ohio Non-MSA	22	2,256	86	33,675	108	9.6	35,931	6.1	14	3,049
Total	128	35,304	1,002	553,882	1,130	100.0	589,186	100.0	82	19,033

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

*** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Akron MSA

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 9.8 percent of tier 1 capital allocated to the AA.

The investments and grants reflected excellent responsiveness to the needs identified in the AA including affordable housing. The bank made 20 LIHTC project investments totaling \$47.0 million in

the current period. The majority of the \$2.1 million in grants and donations was to community service organizations that provide services to LMI individuals, with an emphasis on affordable housing.

Examples of CD investments made in the AA include:

- HCDC invested in two LIHTC investments that provided both debt and equity for the following projects:
 - HNB invested \$8.6 million in a 40-unit family housing development to help support refugee resettlement in the North Hill Neighborhood of Akron.
 - HNB invested \$6.8 million in a housing development consisting of 68 permanent housing units in a moderate-income geography in Akron. The units were to target to individuals with persistent mental illness and/or substance abuse disorders and the homeless population.
- HNB invested a total of \$4.2 million to fund the new construction of a LIHTC project that consisted of 60 one-bedroom units of affordable housing.

Cleveland MSA

The institution had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 6.9 percent of tier 1 capital allocated to the AA.

The investments and grants reflected excellent responsiveness to the needs identified in the AA including affordable housing. CD investments involved several complex tax credit projects where the bank acted in a leadership role with participations from federal, state, and local housing agencies, and/or real estate developers. The bank made 31 LIHTC project investments totaling \$69.3 million in the current period. The remaining investments related to economic development and were made to a Small Business Investment Company (SBIC). The majority of the \$1.3 million of grants and donations was to community service organizations that provide services to LMI individuals.

Examples of CD investments made in the AA include:

- HCDC purchased \$10 million of an 18-month multifamily housing revenue bond series for the acquisition and redevelopment of a 151-unit apartment project targeting moderate-income individuals and families at no more than 60 percent average median income. The location of the project was in a moderate-income geography in Warrensville Heights, Ohio.
- HNB donated \$500,000 to a community-wide, public/private partnership to help increase the development, funding, visibility, and impact of early childhood services in Cuyahoga County. The funds supported six Head Start sites. Per Federal eligibility requirements, Head Start accepts only preschool age children from families with incomes below poverty guidelines, children from homeless families, families receiving public assistance, and foster children regardless of foster family income.

Columbus MSA

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 8.4 percent of tier 1 capital allocated to the AA.

The investments and grants reflected excellent responsiveness to the needs identified in the AA affordable housing needs. CD investments involved several complex tax credit projects where the bank acted in a leadership role with participations from federal, state, and local housing agencies, and/or real estate developers. The bank made 44 LIHTC project investments for affordable housing totaling \$144.8 million in the current period. Other investments totaling \$77.9 million were related to economic development and were made to an SBIC. The majority of the \$6.6 million grants and donations was to community service organizations that provide services to LMI individuals.

Examples of innovative and/or complex CD investments made in the Columbus MSA AA during the current period include:

- HCDC purchased \$9.2 million in LIHTCs and \$2.3 million in deductible tax savings, a total investment of \$11.5 million. The project consisted of a 100-unit senior housing development in Dublin, Ohio. The property included 51 affordable housing units, including three units with an Ohio Department of Medicaid subsidy, and 49 market-rate units.
- HNB was the leader in a \$24 million investment in a complex \$48 million syndicated 36-month construction facility for a mixed-use project that consisted of 234 multi-family units, office space, and retail space. The project, just outside downtown Columbus in a low-income geography, complied with a district plan with the expectation it will attract new and retain existing businesses and residents.
- HNB was the leader in a 36-month, \$50.4 million participation loan of which the bank holds a \$26.4 million investment. The loan was for the construction of a new 12-story mixed-use project with 125 multi-family units and special multi-tenant commercial space. The project was located adjacent to the Columbus Commons Park in the central business district of Columbus, Ohio, an area designated for redevelopment by the city. The bank structured the transaction with the borrower using Columbus-Franklin County Finance Authority Taxable Development Lease Revenue Bonds.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Canton MSA, Dayton MSA, Lima MSA, Springfield MSA, Toledo MSA, and the Ohio Non-MSA AAs was consistent with the bank's overall performance under the Investment Test in the full-scope areas. The bank's performance in the Mansfield MSA AA was weaker than the bank's performance under the Investment Test in the full-scope areas due to a lower volume of qualified investments. The institution's performance under the Investment Test in the limited-scope areas had a neutral impact on the overall Investment Test rating for the state of Ohio.

SERVICE TEST

The bank's performance under the Service Test in Ohio is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Akron MSA, Cleveland MSA, and Columbus MSA AAs was good.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)**				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Akron MSA	8.7	42	10.9	7.1	19.1	38.1	35.7	11.4	19.7	41.7	27.2
Cleveland MSA	22.2	115	29.8	7.0	16.5	36.5	40.0	12.1	20.0	34.3	33.2
Columbus MSA	47.1	79	20.5	10.1	13.9	35.4	38.0	10.3	21.6	34.1	33.2
Limited-Scope:											
Canton MSA	5.8	26	6.7	0.0	3.9	65.4	26.9	6.3	10.7	65.7	17.0
Dayton MSA	1.6	12	3.1	0.0	16.7	50.0	33.3	9.1	20.1	42.8	28.1
Lima MSA	0.5	4	1.0	0.0	50.0	25.0	25.0	6.7	18.5	47.6	27.2
Mansfield MSA	0.3	3	0.8	0.0	0.00	66.7	33.3	3.9	16.8	57.4	21.8
Springfield MSA	0.6	3	0.8	0.0	33.3	33.3	33.3	7.4	27.0	40.9	24.7
Toledo MSA	5.3	36	9.3	14.0	5.6	41.7	38.9	13.2	14.6	40.9	30.4
Ohio Non-MSA	7.9	66	17.1	0.0	30.3	50.0	19.7	0.8	15.2	64.0	19.6

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Akron MSA

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below and in moderate-income geographies approximated the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 84 ATMs in the AA, of which 63 were deposit-taking.

Cleveland MSA

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below and in moderate-income geographies near to the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 212 ATMs in the AA, of which 154 were deposit-taking.

Columbus MSA

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies approximated and in moderate-income geographies was below the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 223 ATMs in the AA, of which 150 were deposit-taking.

Distribution of Branch Openings/Closings*						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Akron MSA	2	17	-3	-3	-7	-2
Cleveland MSA	10	49	0	-4	-23	-12
Columbus MSA	5	21	-2	-3	-5	-5
Limited-Scope						
Canton MSA	0	7	-1	-1	-5	0
Dayton MSA	2	4	0	1	-2	-1
Lima MSA	1	1	0	1	-1	0
Mansfield MSA	0	1	-1	0	0	0
Springfield MSA	0	0	0	0	0	0
Toledo MSA	1	4	-2	0	-1	0
Ohio Non-MSA	1	21	-1	-6	-10	-3

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Akron MSA

To the extent changes have been made, the institution's opening and closing of branches had adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed 17 branches, three in low-income geographies and three in moderate-income geographies. Half of these closures (one in a low-income geography and two in moderate-income geographies) were branch consolidations with another nearby HNB location. The remaining three closures were due to low branch utilization. The two branch openings were in upper-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AAs, particularly low- and moderate-income geographies and/or individuals. HNB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm, and Saturday from 9:00 am to 12:00 pm. Of the 42 branches, 25 have drive-through facilities open the same hours as the lobby. Additionally, 14 branches are within large

regional chain grocery stores, three of which are in moderate-income geographies. Grocery store branch hours are 10:00 am to 7:00 pm Monday through Friday and 10:00 am to 3:00 pm Saturday and Sunday.

Cleveland MSA

To the extent changes have been made, the institution's opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed 49 branches, of which only two were in low-income geographies and six in moderate-income geographies. Four closures (one in a low-income geography and three in moderate-income geographies) were due to low branch utilization. The remaining four moderate-income branch closures were due to consolidation with other near-by branch locations. While the closures lowered the number of branches in low- and moderate-income geographies, there was minimal impact on the bank's ability to service LMI individuals as supported by the lending test conclusions. The bank opened 10 branches, of which two branches were in low-income geographies and two branches were in moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals. Branches were open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm, and Saturday from 9:00 am to 12:00 pm. Out of the 71 stand-alone branches, all maintained Saturday hours except for the five downtown business district branches with minimal weekend retail business activity. The three drive-through only facilities were open the same hours as the stand-alone branches. Additionally, 41 branches are located within large regional chain grocery stores, one in a low-income geography and six in moderate-income geographies. Grocery store branch hours are Monday through Friday from 10:00 am to 7:00 pm and Saturday and Sunday from 10:00 am to 3:00 pm.

Columbus MSA

To the extent changes have been made, the institution's opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed 21 branches, of which three were in low-income geographies and three were in moderate-income geographies. Two of these branch closures (one in a low-income geography and one in a moderate-income geography) were the result of the closures of the grocery chain stores in which the branches were located. Eight of the closures were branch consolidations with other nearby HNB locations. While the closures lowered the number of branches in low- and moderate-income geographies, there was minimal impact on the bank's ability to service LMI individuals as supported by the lending test conclusions. The bank opened five branches, of which two were in low-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals. HNB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm, and Saturday from 9:00 am to 12:00 pm. Out of the 60 stand-alone branches, all but six branches keep Saturday hours. Three of the branches closed on Saturday were on college campuses; the other three branches closed on Saturday were in downtown or commercial centers with minimal weekend retail business activity. Additionally, 19 branches were located within large regional chain grocery stores, four of which were in moderate-income geographies. The grocery store branches were open Monday through Friday from 10:00 am to 7:00 pm and Saturday and Sunday from 10:00 am until 3:00 pm.

Community Development Services

Akron MSA

The institution provided a significant level of CD services. Employees provided financial or job-specific expertise and/or technical assistance for 510 CD service activities to 55 organizations, recording 3,206 qualified hours within this AA. About half of these hours, or 1,617, related to the bank's assistance organizations that provided financial literacy and first-time homebuyer education. Employees also served on the boards of directors for 17 nonprofit organizations, totaling 1,013 hours. In addition, the bank's assistance was responsive to identified needs in the AA, particularly with financial education and homebuyer counseling and education for LMI individuals and families.

The following are examples of CD services provided in this AA:

- One HNB employee served as a board trustee for a nonprofit that provides low-cost senior housing. The employee advised and voted on various property rehabilitation projects, marketing / community engagement, and setting annual housing employee salaries and wages.
- An HNB employee demonstrated the home buying process from the application to closing for 25 participants at a nonprofit neighborhood development corporation event, including follow-up work to ensure the prospective first-time homebuyers understood the process after the completion of the credit counseling classes.
- One HNB employee served on a board of directors as member of the finance committee in a local chapter of a large internationally known charitable organization that builds houses for LMI families. The organization assists families with incomes at 30-80 percent of the MSA median income.

Cleveland MSA

The institution provided a significant level of CD services. Employees provided financial or job-specific expertise and/or technical assistance for 1,154 CD service activities to 127 organizations, totaling 5,849 qualified hours. The majority of the bank's assistance, 3,080 hours, was to organizations that provide community services to LMI individuals and families. Other activities included small business assistance and board of director service for a total of 1,826 hours. The bank's assistance was responsive to identified needs in the AA, particularly with financial education for LMI individuals and families.

The following are examples of CD services provided in this AA:

- Fifteen HNB employees recorded 688 hours teaching LMI students the FDIC's Youth Money Smart Program to provide basic financial education and a detailed simulation of budgeting, credit, and income decisions based on real-life scenarios.
- One HNB employee provided over 100 hours of board service, attending monthly financing committee and quarterly board meetings, and preparing financial projections to contributors. The nonprofit organization provides small business assistance to LMI neighborhoods.

Columbus MSA

The institution provided a significant level of CD services. Employees provided financial or job-specific expertise and/or technical assistance for 792 CD service activities to 87 organizations, totaling 5,886

qualified hours. The majority of the bank's assistance, 3,006 hours, was to organizations that provide community services to LMI individuals and families, including financial literacy and first-time homebuyer education. Employees also served on the boards of directors for 24 nonprofit organizations, providing 1,515 hours of assistance. The bank's assistance was responsive to identified needs in the AA, particularly with financial education and homebuyer counseling and education for LMI individuals and families.

The following are examples of CD services provided in this AA:

- One HNB employee served on the board of directors and was a committee member of a nonprofit residential development corporation. The corporation operated 297 senior housing communities, 15 family housing communities, six permanent supportive housing communities, and five assisted living/skilled nursing facilities. Most of the communities provide housing for low-income seniors based on HUD guidelines of less than 80 percent of median family income levels for the geographies.
- An HNB employee instructed on four separate occasions the mortgage part of a homebuyer education class for prospective first-time homebuyers attending events at the university extension program located in an LMI district. The instruction included explaining grants and down payment assistance to LMI prospective homebuyers and teaching the mortgage process and what a borrower must do to be mortgage ready, including credit, down payments, mortgage programs, income, and liabilities.
- One HNB employee served on a board of directors and as a member of the fundraising committee of a nonprofit advocacy group that works to improve, expand, guide, and positively influence policy for affordable housing in Ohio.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Lima MSA, Springfield MSA, and the Ohio Non-MSA AAs was consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance under the Service Test in the Canton MSA, Dayton MSA, Mansfield MSA, and the Toledo MSA AAs was weaker than the bank's overall performance under the Service Test in the full-scope areas due to poorer branch distributions in low- and moderate-income geographies. The institution's performance under the Service Test in the limited-scope areas had a neutral impact on the overall Service Test rating for the state of Ohio.

State of Pennsylvania

CRA rating for the State of Pennsylvania⁷: 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:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses was excellent and overall borrower distribution was good.
- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.
- CD services were effective and responsive in addressing community needs. The bank provided a significant level of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Pennsylvania

HNB delineated three AAs within Pennsylvania. They included the entirety or portions of the Pittsburgh, PA (Pittsburgh) MSA, Erie, PA (Erie) MSA, and one Non-MSA (Pennsylvania Non-MSA) county. Refer to appendix A for a list of counties reviewed within each AA.

Based on June 30, 2019 FDIC summary of deposit information, HNB had \$3.8 billion of deposits in Pennsylvania, which represented 4.5 percent of the bank's overall deposits. The bank originated and purchased \$1.5 billion in loans or 4.0 percent of total bank loan originations and purchases during the evaluation period. The bank's primary loan products in Pennsylvania were home mortgage loans and small loans to businesses.

HNB operated 43 branches, representing 4.7 percent of the bank's branches, and 59 ATMs, of which 54 were deposit-taking. HNB ranked ninth out of 42 depository institutions with 2.4 percent deposit market share. The leading three depository institutions in the state were PNC Bank, N.A. with a 41.6 percent market share, BNY Mellon, N.A. with a 13.42 percent market share, and The Bank of New York Mellon with a 10.9 percent market share.

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..

Pittsburgh MSA

The following table provides a summary of the demographics, including housing and business information, for the Pittsburgh MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsburgh MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	656	8.8	21.6	44.7	22.6	2.3
Population by Geography	2,156,096	5.2	17.1	48.6	28.5	0.6
Housing Units by Geography	1,009,395	6.1	19.2	48.7	25.9	0.1
Owner-Occupied Units by Geography	630,967	2.8	14.3	51.9	31.1	0.0
Occupied Rental Units by Geography	278,034	11.1	26.8	43.7	18.1	0.4
Vacant Units by Geography	100,394	13.0	28.9	42.6	15.2	0.3
Businesses by Geography	168,466	4.8	13.5	42.7	38.1	0.8
Farms by Geography	3,920	2.1	10.6	57.6	29.6	0.1
Family Distribution by Income Level	558,302	20.3	17.1	20.5	42.1	0.0
Household Distribution by Income Level	909,001	24.6	15.3	17.0	43.2	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$69,624	Median Housing Value			\$140,986
			Median Gross Rent			\$764
			Families Below Poverty Level			8.1%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The Pittsburgh MSA AA consisted of five of the seven counties in the Pittsburgh, PA MSA. According to the FDIC's Summary of Deposits, as of June 30, 2019, HNB's deposits in the AA comprised 3.9 percent of the bank's total deposits.

Within the Pittsburgh MSA AA, the bank had \$3.3 billion in deposits and ranked ninth out of 44 depository institutions in the AA with a 2.3 percent market share. The top three depository institutions in terms of deposit market shares were PNC Bank, N.A. with a 42.1 percent, BNY Mellon, NA, with a 14.1 percent, and The Bank of New York Mellon, with a 11.4 percent. HNB operated 35 branches and 45 ATMs in the AA, of which 43 were deposit-taking.

Information from the September 2019 Moody's Analytics report indicated the Pittsburgh, Pennsylvania economy is in a period of slow growth. The Pittsburgh MSA AA's major economic drivers included finance, medical technology/centers, and energy and natural resources. Low business costs and a large pool of graduates in the science, technology, engineering, and science fields helped Pittsburgh develop into a technology hub. The region saw an increased technology presence with an influx of companies including Apple, Microsoft, and Google. Royal Dutch Shell's construction of a massive petrochemical manufacturing plant continued to support over 5,000 construction jobs. Other major employers in the

Pittsburgh MSA AA included UPMC Health System, Highmark Inc., The University of Pittsburgh, and PNC Financial Services Group.

Strengths of the Pittsburgh economy included the presence of top educational and research institutions and a skilled labor force. The area had a relatively low cost of living compared to other large Northeastern metropolitan areas. Although competition from e-commerce adversely impacted Pittsburgh's brick and mortar stores, Pittsburgh was growing as a logistics hub and many e-commerce companies had expanded their presence in the area. Amazon, for instance, built a distribution facility in Findlay Township, PA.

Hindering long-term economic growth was the area's weak population metrics. Labor force contraction continued to occur in Pittsburgh due to an aging population and the number of residents leaving Pittsburgh exceeding the number of residents coming into the MSA. The aging infrastructure of Pittsburgh also presented difficulties for businesses and citizens. However, led by the high technology and healthcare industries, Moody's Analytics expected Pittsburgh's economy to correct itself and for job growth in the Pittsburgh MSA AA to catch up to the Pennsylvania average.

Based on information in the above table, low-income families earned less than \$34,812 and moderate-income families earned less than \$55,699. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$870 for low-income borrowers and \$1,392 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$757.

According to the U.S. BLS, the Pittsburgh MSA AA unemployment rate mirrored the rest of the country and declined from an average of 5.6 percent in 2016 to an average of 4.0 in the first nine months of 2019.

Information provided by two community contacts, both of which were community development organizations, identified the following needs within the Pittsburgh MSA AA:

- Rehabilitation and home improvement loans to improve the housing stock that require structural repairs.
- Low-income housing and support services for seniors as critical.
- Access to safe and affordable single-family housing (for both rental and purchase).
- Affordable housing.
- Checking accounts and retirement account services for start-up and newer companies.

Scope of Evaluation in Pennsylvania

Examiners selected the Pittsburgh MSA AA for a full-scope review. The Pittsburgh MSA AA had the largest percentage of deposits and reported loans within the state at 87.2 percent and 85.0 percent, respectively. The Erie MSA and the Pennsylvania Non-MSA AAs received limited-scope reviews. Refer to appendix A for more information.

Examiners based the ratings on the results of the area that received a full-scope review and the bank's performance in the limited-scope areas, as applicable. The Pittsburgh MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Pennsylvania.

Examiners placed more emphasis on home mortgage loans versus small loans to businesses in arriving at the overall conclusion. HMDA loans represented the majority of HNB's lending in all three AAs. HNB did not originate enough farm loans in either analysis period in any of the AAs to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

The bank's performance under the Lending Test in Pennsylvania is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans 2016 - 2019*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Pittsburgh MSA	6,377	2,908	24	33	9,342	85.9	87.2
Limited-Scope:							
Erie MSA	297	156	0	2	455	4.2	2.0
Pennsylvania Non-MSA	769	309	2	3	1,083	9.9	10.8
Total	7,443	3,373	26	38	10,880	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans 2016 - 2019* (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Pittsburgh MSA	\$1,039,854	\$275,178	\$1,565	\$200,168	\$1,516,765	90.4	87.2
Limited-Scope:							
Erie MSA	\$34,257	\$13,681	\$0	\$981	\$48,919	2.9	2.0
Pennsylvania Non-MSA	\$80,583	\$27,813	\$54	\$4,076	\$112,526	6.7	10.8
Total	\$1,154,694	\$316,672	\$1,619	\$205,225	\$1,678,210	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

HNB ranked ninth in deposits out of 44 depository institutions (top 21 percent), with a 2.5 percent market share in the AA. In overall HMDA lending, HNB ranked eighth out of 558 lenders (top 2 percent) with a 3.3 percent market share. The top three lenders in terms of market share were PNC Bank, N.A with a 10.0 percent market share, Wells Fargo Bank, NA, with a 6.9 percent market share, and Dollar Bank, FSB with a 6.5 percent market share.

For small loans to businesses, HNB ranked 14th out of 131 lenders (top 11 percent) with a market share of 5.39 percent. The top three lenders in terms of market share were PNC Bank, N.A. with a 20.8 percent market share, American Express National Bank with a 17.0 percent market share, and Chase Bank USA, N.A. with a 10.1 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

- For 2017 – 2019, the proportion of home mortgage loans in low-income geographies was below the proportion of OOU's but exceeded the aggregate distribution of loans in those geographies.
- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies exceeded both the proportion of OOU's and the aggregate distribution of loans in those geographies.
- For 2016, the bank's geographic distribution of home mortgage loans was weaker than the bank's geographic distribution of home mortgage loans for 2017 – 2019 due to poorer distributions in both low- and moderate-income geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good.

- For 2017 – 2019, the proportion of small loans to businesses in low-income geographies was below the proportion of small businesses located in those geographies but near-to the aggregate distribution of loans to small businesses.
- For 2017 – 2019, the proportion of small loans to businesses in moderate-income geographies was near-to both the proportion of small businesses located in those geographies and the aggregate distribution of loans to small businesses.
- For 2016, the bank's geographic distribution of small loans to businesses was stronger than the bank's geographic distribution of small loans to businesses for 2017 – 2019 due to better distribution in both low- and moderate-income geographies.

Lending Gap Analysis

The OCC analyzed HNB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.
- For 2016, the bank's borrower distribution of home mortgage loans was consistent with the bank's borrower distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

Refer to Table R in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

- For 2017 – 2019, the percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of small businesses in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank's borrower distribution of small loans to businesses with revenues of \$1 million or less was consistent with the bank's distribution of small loans to businesses for 2017 – 2019

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion for all three full-scope AAs.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Pittsburgh MSA AA was excellent. HNB made 33 CD loans in its AA for a total of \$200.2 million, which represented 48.2 percent of allocated tier 1 capital. The bank made use of innovative and complex CD loans to assist LMI individuals with affordable housing and revitalization, economic development, and community services. The bank made six CD loans totaling \$51.6 million with the primary purpose of revitalization and stabilization of the AA. HNB made nine CD loans totaling \$27.7 million for economic development of LMI neighborhoods. The bank made one loan totaling \$6.0 million for the purpose of affordable housing, creating 24 units for LMI individuals and families. The greatest number of CD loans, 15 totaling \$110.4 million, were made to organizations providing community services to LMI individuals. The loans were responsive to the identified needs for affordable housing and to revitalize and stabilize the community.

Examples of CD loans in the AA include:

- HNB refinanced a \$4.7 million loan used to reconstruct a women's shelter facility to increase capacity by 33 percent and provide additional security improvements. The nonprofit women's center and shelter provide safety, shelter, support, and guidance to victims of domestic violence in the greater Pittsburgh area. Incomes for the facility's residents approximated \$4,000 per capita and \$7,600 per household, well below the poverty level and the low-income threshold for the Pittsburgh MSA AA.
- HNB renewed a \$2.5 million revolving line-of-credit for an arts and technology training center that focuses on adult career training and youth arts education. Over 62.0 percent of the students qualified for the free or reduced lunch program.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Under the bank's *Community Access Mortgage* program, the bank funded 10 first-time homebuyer mortgages totaling \$549,000. Under the *HomeTown Mortgage* loan program, the bank funded 38 first-time homebuyer mortgages totaling \$4.4 million. The bank also made 80 unsecured home improvement loans totaling \$668,000 and 490 loans under the *Debt Manager* program totaling \$5.6 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Erie MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance in the Pennsylvania Non-MSA AA was weaker than the bank's overall performance due to a poorer geographic distribution of home mortgage loans. Performance in this limited-scope AA did not affect the bank's overall rating for the state of Pennsylvania.

Refer to Tables O through T in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Pennsylvania is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh MSA AA was excellent.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Pittsburgh MSA	8	6,115	160	31,013	168	89.3	37,128	81.3	1	56
Limited-Scope										
Erie MSA	1	50	3	2,704	4	2.1	2,754	6.0	0	0
Non-MSA Pennsylvania	2	113	6	4,031	8	4.3	4,144	9.1	0	0
Total	17	7,167	171	38,506	188	100.0	45,673	100.0	3	540

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

*** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 8.9 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution made extensive use of innovative and/or complex investments to support CD initiatives. The bank made eight single investor LIHTC project investments for \$28.0 million and invested in four LIHTC syndications totaling \$3.1 million. HNB made the majority of its current period grants and donations of \$1.2 million to community service organizations that provided services to LMI individuals, with emphasis on youth programs and job training for the unemployed and/or underemployed.

Examples of CD investments made in the AA include:

- HCDC invested \$3.1 million in a LIHTC-eligible development. The development was a senior apartment complex comprised of 12 one-story buildings consisting of 62 townhouse units located in Plum Borough, Allegheny County, Pennsylvania. The project targeted residents 62 years of age and older with income less than 60 percent of the AMI.
- HCDC invested \$6.1 million in a low-income housing limited partnership. The development will replace demolished public housing located 1.5 miles north of downtown Pittsburgh and will consist of 65 new units, 47 of which will be LIHTC eligible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in both the Erie MSA and Pennsylvania Non-MSA AAs was consistent with the bank's overall performance in the Investment Test in the full-scope area. Performance in the limited-scope AAs did not affect the overall Investment Test rating for the state of Pennsylvania.

SERVICE TEST

The bank's performance under the Service Test in Pennsylvania is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh MSA AA was good.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)**				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Pittsburgh MSA	87.2	35	81.4	2.9	17.1	45.7	34.3	5.2	17.1	48.6	28.5
Limited-Scope:											
Erie MSA	2.0	2	4.6	0.0	50.0	50.0	0.0	9.6	12.9	46.3	30.4
Pennsylvania Non-MSA	10.8	6	14.0	33.3	0.0	33.3	33.3	6.4	8.3	72.0	13.3

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below, and in moderate-income geographies equaled, the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 45 ATMs in the AA, of which 43 were deposit-taking.

Distribution of Branch Openings/Closings*						
Branch Openings/Closings*						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Pittsburgh MSA	2	4	-1	-2	-1	2
Limited-Scope						
Eric MSA	0	0	0	0	0	0
Pennsylvania Non-MSA	1	0	1	0	0	0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches had adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed four branches, one in a low-income geography and two in moderate-income geographies. The branch closures were due to low customer utilization. The bank opened two branches, both in upper-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. Branches were open Monday through Thursday from 9:00 am to 4:00 pm or 5:00 pm, Friday from 9:00 am to 5:00 pm or 6:00 pm, and Saturday from 9:00 am to 12:00 pm. Of the 35 branches, 27 have drive-through facilities open the same hours as the branch lobbies.

Community Development Services

The institution provided a significant level of CD services.

Employees provided financial or job-specific expertise and/or technical assistance for 434 CD service activities to 56 organizations totaling 2,284 qualified hours within this AA. Over 850 hours of assistance were to organizations that provide community services to LMI individuals and families, including financial literacy and first-time homebuyer education. Other activities, totaling over 950 hours, targeted small business assistance and board of director and committee member service. The bank's assistance was responsive to identified needs in the AA, particularly with financial education and homebuyer counseling and education for LMI individuals and families.

The following are examples of CD services provided in this AA:

- Eighteen HNB employees contributed 90 hours participating in a local high school's first "Reality Day" aimed at empowering high school juniors to make good financial decisions over the course of their lifetime. Ninety-eight percent of students were enrolled in the free or reduced lunch program. Students participated in a classroom lecture and then an interactive "game of life" where they were assigned a job, credit score, and a family, and used a simulated checking account to pay for monthly necessities including food, housing, childcare, taxes, transportation, utilities, and other expenses.
- One HNB employee contributed 26 hours as the instructor for a first-time homebuyer education workshop for LMI individuals, hosted by a greater Pittsburgh nonprofit community organization; the events drew in up to 22 participants for the two-hour weekend training.

- One HNB employee contributed 66 hours as a member of the board of directors of a nonprofit that serves LMI communities and individuals with four main programs: workforce and business development, housing counseling, housing and real estate development, and community outreach. The nonprofit renovates and constructs high quality affordable housing and assists the surrounding community to develop and maintain their main street districts; provides individuals with the tools and training needed to enter the workforce; and offers one-on-one housing counseling services to teach successful home ownership.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Erie MSA and Pennsylvania Non-MSA AAs was consistent with the bank's overall performance under the Service Test in the full-scope area.

State of West Virginia

CRA rating for the State of West Virginia⁸: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses was excellent and overall borrower distribution was good.
- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an adequate level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

Description of Institution's Operations in West Virginia

HNB delineated five AAs within West Virginia. They included portions of the Morgantown, WV (Morgantown) MSA, Charleston, WV (Charleston) MSA, Huntington-Ashland WV-KY-OH (Huntington) MSA, Parkersburg-Vienna, WV (Parkersburg) MSA, and five Non-MSA (West Virginia Non-MSA) counties. Refer to Appendix A for a list of counties reviewed within each AA.

Based on June 30, 2019, FDIC summary of deposit information, HNB had \$3.8 billion of deposits in West Virginia, which represented 2.7 percent of the bank's overall deposits. The bank originated and purchased \$793.2 million in loans or 2.2 percent of total bank loan originations and purchases during the evaluation period. The bank's primary loan products in West Virginia were home mortgage loans and small loans to businesses.

HNB operated 28 branches, representing 3.1 percent of the bank's branches, and 42 ATMs, of which 30 were deposit-taking. HNB ranked third out of 40 depository institutions with an 11.9 percent deposit market share. The top two depository institutions in terms of deposit market share were Branch Banking and Trust Company with an 18.6 percent market share and United Bank with an 18.5 percent market share.

⁸ 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.

Morgantown MSA

The following table provides a summary of the demographics, including housing and business information, for the Morgantown MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Morgantown MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.2	20.8	41.7	33.3	0.0
Population by Geography	101,668	1.5	20.3	41.1	37.2	0.0
Housing Units by Geography	44,167	0.7	22.6	42.3	34.5	0.0
Owner-Occupied Units by Geography	21,173	0.0	15.3	43.2	41.4	0.0
Occupied Rental Units by Geography	15,862	1.2	31.6	39.6	27.6	0.0
Vacant Units by Geography	7,132	1.3	24.4	45.2	29.1	0.0
Businesses by Geography	6,982	0.3	21.7	37.5	40.5	0.0
Farms by Geography	136	0.0	9.6	46.3	44.1	0.0
Family Distribution by Income Level	19,381	20.9	14.4	20.4	44.2	0.0
Household Distribution by Income Level	37,035	29.1	13.1	14.3	43.5	0.0
Median Family Income MSA - 34060 Morgantown, WV MSA		\$63,745	Median Housing Value			\$172,514
			Median Gross Rent			\$765
			Families Below Poverty Level			10.7%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The Morgantown MSA AA consisted of one of the two counties in the Morgantown, WV MSA. According to the FDIC's Summary of Deposits as of June 30, 2019, HNB's deposits in the AA comprised 0.6 percent of the bank's total deposits.

Within the Morgantown MSA AA, the bank had \$467.7 million in deposits and ranked second out of 11 depository institutions in the AA with an 18.1 percent market share. The first and third depository institutions in terms of deposit market share were United Bank with a 31.2 percent and Branch Banking and Trust Company with a 16.5 percent. HNB operated seven branches and 10 ATMs in the AA, of which six were deposit-taking.

Information from the September 2019 Moody's Analytics report indicated the Morgantown MSA AA economy was stagnant in 2019 because of decreased hiring in the AA and a lackluster labor market. However, due to the robust growth of the city's healthcare industry during the evaluation period, analysts expected Morgantown's economy to improve in 2020. An additional cause for improvement in Morgantown's economy was the stabilization of the state's government so that steady funding for schools, universities, and other public institutions in the AA keep thousands of employees on the job. Additionally, the location of West Virginia University in Morgantown offered stability, although a challenge remains with many of the students graduating and leaving the area, taking their education and

skills to other larger markets. Longer term, the expectation is that Morgantown will retain its edge over the rest of West Virginia and keep pace with the U.S. due to the large healthcare and university presence.

Morgantown MSA AA's major economic drivers include government (including federal research labs), education, and healthcare services. Other significant industries in Morgantown include accommodation and food services, professional, scientific, and technical services, and construction. The largest employers in the AA and the surrounding area include West Virginia University, West Virginia University Hospitals, Mylan Pharmaceuticals, Inc., Monongalia County Board of Education, University Health Associates, Monongalia General Hospital, and Teletech Customer Care Management (WV), Inc.

Based on information in the above table, low-income families earned less than \$31,873 and moderate-income families earned less than \$50,996. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$797 for low-income borrowers and \$1,275 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$926. Low-income borrowers would be challenged to afford a mortgage loan in the Morgantown MSA AA.

According to the U.S. BLS, the Morgantown MSA AA unemployment rate mirrored the rest of the country and declined from 4.6 percent in 2016 to 3.9 percent in 2019, lower than the 4.9 percent for the state of West Virginia, but higher than the U.S. rate of 3.5 percent. The MSA posted a higher-than-average poverty rate of 19 percent in 2018 and approximately 41 percent of area households earned less than \$40,000 in gross annual income; approximately 23 percent earned over \$100,000. The area has a relatively low cost of living compared to metropolitan areas in surrounding states.

Information provided by the one community contact, a regional housing authority, conducted as part of this evaluation identified the following needs within the Morgantown MSA AA.:

- Safe and affordable single-family housing (for both rental and purchase).
- First-time homebuyer mortgages, including down payment assistance.
- Home rehabilitation loans to improve the current housing stock.

Scope of Evaluation in West Virginia

Examiners selected the Morgantown MSA AA for a full-scope review. While this area accounted for neither the largest portion of the state's lending nor the largest portion of deposits, examiners selected this AA for a full-scope review because it had been reviewed as a limited-scope AA in the prior two CRA evaluations. The Charleston MSA, Huntington MSA, Parkersburg MSA, and West Virginia Non-MSA AAs received limited-scope reviews. Refer to appendix A for more information.

Examiners based the ratings on the results of the area that received a full-scope review and the bank's performance in the limited-scope areas, as applicable. The Charleston MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of West Virginia.

Examiners placed more emphasis on home mortgage loans versus small loans to businesses and small loans to farms in arriving at the overall conclusion. HMDA loans represented the majority of HNB's

lending in all five AAs. HNB did not originate enough small loans to farms in any of the AAs to complete a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA

LENDING TEST

The bank's performance under the Lending Test in West Virginia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Morgantown MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans 2016 - 2019*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Morgantown MSA	1,068	168	2	3	1,241	20.7	23.3
Limited-Scope:							
Charleston MSA	724	442	9	1	1,176	19.5	32.8
Huntington MSA	736	364	4	1	1,105	18.4	9.2
Parkersburg MSA	394	134	0	2	530	8.8	6.5
West Virginia Non-MSA	1,506	448	6	4	1,964	32.6	28.2
Total	4,428	1,556	21	11	6,016	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans 2016 - 2019* (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Morgantown MSA	\$203,596	\$17,649	\$26	\$12,000	\$233,271	28.6	23.3
Limited-Scope:							
Charleston MSA	\$91,156	\$52,812	\$544	\$1,106	\$145,618	17.9	32.8
Huntington MSA	\$97,960	\$35,174	\$290	\$2,200	\$135,624	16.7	9.2
Parkersburg MSA	\$52,351	\$13,770	\$0	\$5,685	\$71,806	8.8	6.5
West Virginia Non-MSA	\$176,189	\$51,430	\$294	\$220	\$228,133	28.0	28.2
Total	\$621,252	\$170,835	\$1,154	\$21,211	\$814,452	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

HNB ranked second in deposits out of 11 depository institutions (top 19 percent) with an 18.1 percent market share in the AA. In overall HMDA lending, HNB ranked first out of 133 home mortgage lenders (top 1 percent) with a 13.0 percent market share. The second and third lenders in terms of market share

were Clear Mountain Bank with an 8.5 percent market share and Home Savings Bank with an 8.0 percent market share.

For small loans to businesses, HNB ranked 10th out of 70 small business lenders (top 15 percent) with a 3.2 percent market share. The top three lenders in terms of market share were Branch Banking and Trust Company with a 16.6 percent market share, American Express National Bank with a 13.5 percent market share, and United Bank with a 6.5 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of 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 and purchases.

The geographic distribution of home mortgage loans was excellent.

- For 2017 – 2019, the proportion of home mortgage loans in low-income geographies approximated both the proportion of OOU's and the aggregate distribution of loans in those geographies.
- For 2017 – 2019, the proportion of home mortgage loans in moderate-income geographies exceeded both the proportion of OOU's and the aggregate distribution of loans in those geographies.
- For 2016, the bank's geographic distribution of home mortgage loans was consistent with the bank's geographic distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

- For 2017 – 2019, HNB did not make any loans in low-income geographies, however only 0.3 percent of businesses were in low-income geographies.
- For 2017 – 2019, the proportion of small loans to businesses in moderate-income geographies exceeded both the proportion of small businesses located in those geographies and the aggregate distribution of loans to small businesses.
- For 2016, the bank's geographic distribution of small loans to businesses was weaker than the bank's geographic distribution of small loans to businesses for 2017 – 2019 due to poorer distribution in moderate-income geographies.

Lending Gap Analysis

The OCC analyzed HNB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of West Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good.

- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but exceeded the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2019, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.
- For 2016, the bank's borrower distribution of home mortgage loans was consistent with the bank's borrower distribution of home mortgage loans for 2017 – 2019.

Small Loans to Businesses

Refer to Table R in the state of West Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

- For 2017 – 2019, the percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of small businesses in the AA but exceeded the aggregate distribution of all reporting lenders.
- For 2016, the bank's borrower distribution of small loans to businesses with revenues of \$1 million or less was consistent with the bank's distribution of small loans to businesses for 2017 – 2019.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables reflect all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Morgantown MSA AA was excellent. HNB made three CD loans in its AA for a total of \$12.0 million, which represented 20.1 percent of allocated tier 1 capital. The bank made use of innovative CD loans for community service to assist LMI individuals. An example of a CD loan originated in the Morgantown MSA AA is:

- HNB renewed and increased \$12.0 million in working capital revolving lines of credit to support the operations of a Morgantown-based organization that provides in-home continuing care services to patients in West Virginia. Medicaid receivables represent more than 90 percent of the organization's revenues.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs.

Under the bank's *Community Access Mortgage* program, the bank funded one first-time homebuyer mortgage totaling \$171,000. The bank also made 19 unsecured home improvement loans totaling \$201,000 and 95 loans under the *Debt Manager* program totaling \$1.2 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Huntington MSA, Parkersburg MSA, and West Virginia Non-MSA AAs was consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance under the Lending Test in the Charleston MSA AA was weaker than the bank's overall performance under the lending test due to a lower level of CD lending activity. Performance in the limited-scope areas did not affect the overall Lending Test rating for the state of West Virginia.

Refer to Tables O through T in the state of 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 in West Virginia is rated Low Satisfactory. The stronger combined Investment Test performance in the limited-scope AAs positively affected the bank's overall Investment Test rating for the state of West Virginia.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope review, the bank's performance in the Morgantown MSA AA was poor.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Morgantown MSA	2	64	13	164	15	13.6	228	1.0	0	0
Limited-Scope										
Charleston MSA	4	41	41	13,589	49	44.6	13,630	60.6	0	0
Huntington MSA	3	1,900	9	654	12	10.9	2,554	11.3	1	6
Parkersburg MSA	1	23	11	2,223	12	10.9	2,246	10.0	0	0
West Virginia Non-MSA	5	1,820	17	2,035	22	20.0	3,855	17.1	0	0
Total	15	3,848	91	18,665	110	100.0	22,513	100.0	1	6

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

*** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had a few, if any, qualified CD investments and grants, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 0.4 percent of tier 1 capital allocated to the AA.

The institution exhibited adequate responsiveness to credit and community economic development needs. The institution rarely used innovative and/or complex investments to support CD initiatives. The majority of grants, \$131,000, was to community service organizations that provided services to LMI individuals.

Examples of CD investments made in the AA include:

- HNB provided a \$30,000 grant to support programs in a quasi-government agency that connects government assisted programs with private partners and community service programs. Services include public housing, Section-8 housing choice, veterans assistance, family self-sufficiency and housing rehab vouchers, mortgage origination, housing counseling and development, and redevelopment programs.
- HNB provided a \$50,000 grant to a local university's small business "Startup Engine" for the operation of the small business accelerator program. The investment supported students, faculty, and staff in developing and growing their own business ideas in entrepreneurship and innovation, to facilitate growth of the West Virginia economy.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Charleston MSA, Huntington MSA, Parkersburg MSA, and the West Virginia Non-MSA AA were stronger than the bank's overall performance in the Investment Test in the full-scope area due to higher volumes of qualified investments. Performance in the limited-scope AAs positively affected the overall Investment Test rating for the state of West Virginia.

SERVICE TEST

The bank's performance under the Service Test in West Virginia is rated Outstanding

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Morgantown MSA AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)**				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Morgantown MSA	23.3	7	25.0	0.0	28.6	57.1	14.3	1.5	20.3	41.1	37.2
Limited-Scope:											
Charleston MSA	32.8	6	21.4	0.0	16.7	83.3	0.0	1.9	13.1	52.1	32.9
Huntington MSA	9.2	4	14.3	25.0	0.0	50.0	25.0	6.0	14.9	47.1	30.6
Parkersburg MSA	6.5	1	3.6	0.0	0.0	100.0	0.0	0.0	10.1	68.8	21.1
West Virginia Non-MSA	28.2	10	35.7	10.0	10.0	60.0	20.0	0.8	7.5	57.5	34.2

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. HNB did not have any branch location in low-income geographies; however, only 1.5 percent of the population resided within those geographies. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had ten ATMs in the AA, of which six were deposit-taking.

Distribution of Branch Openings/Closings*						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Morgantown MSA	0	0	0	0	0	0
Limited-Scope						
Charleston MSA	1	2	0	0	-1	0
Huntington MSA	0	0	0	0	0	0
Parkersburg MSA	0	1	0	0	-1	0
West Virginia Non-MSA	0	2	0	0	0	-2

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

HNB did not open or close any branches in the Morgantown MSA AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. Branches were open Monday through Thursday from 9:00 am to 4:00 pm or 5:00 pm, Friday from 9:00 to 5:00 pm or 6:00 pm, and Saturday from 9:00 am to 12:00 pm. Out of the seven branches, two had drive-through teller windows that were open the same hours as the branch lobbies. A stand-alone drive-through only facility keeps those same hours. Additionally, two branches were located within a large regional grocery store, both in moderate-income geographies and providing extended hours on weekends. The grocery store branches were open Monday through Friday from 10:00 am to 7:00 pm and Saturday and Sunday from 10:00 am to 3:00 pm.

Community Development Services

The institution provided a significant level of CD services.

Employees provided financial or job-specific expertise and/or technical assistance for 24 CD service activities to four organizations totaling 645 qualified hours within this AA. Approximately two-thirds of the bank's assistance, or 406 hours, were for five bank employees serving on the boards of director of four nonprofit organizations. The remaining one-third of the bank's assistance of 240 hours was to an organization that provided community services to LMI individuals and families, including financial literacy and first-time homebuyer education. The bank's assistance was responsive to identified needs in the AA, particularly with financial education and homebuyer counseling and education for LMI individuals and families.

The following are examples of CD services provided in this AA:

- One HNB employee served as a board member, executive committee member, and chair of the fund-raising campaign to lend financial expertise and leadership abilities to the local chapter of a national charitable organization that supported 52 programs at 27 health and human service agencies that assist seniors, homeless, children and other populations. Intake data reflected 92 percent of clients served by supported agencies were LMI, earning less than \$29,965 per household.

- One HNB employee served as a family selection committee member in a local chapter of a large international charitable organization that builds houses for LMI families. The local organization assisted families with incomes below 60 percent of the MSA median income. The employee worked with applicant families to help resolve credit issues and create a financial budget.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Charleston MSA and West Virginia Non-MSA AAs was consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance under the Service Test in the Huntington MSA and Parkersburg MSA AAs was weaker than the bank's overall performance under the Service Test in the full-scope area due to poorer branch distributions in moderate-income geographies. Performance in the limited-scope areas had a neutral impact on the overall Service Test conclusion.

State of Wisconsin

CRA rating for the State of Wisconsin ⁹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses was good and overall borrower distribution was excellent.
- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made a good level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.
- CD services were effective and responsive in addressing community needs. The bank provided a significant level of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Wisconsin

HNB delineated seven AAs within Wisconsin. They included the entirety or portions of the Appleton, WI (Appleton) MSA, Duluth, MN-WI (Duluth) MSA, Green Bay, WI (Green Bay) MSA, Madison, WI (Madison) MSA, Milwaukee-Waukesha-West Allis, WI (Milwaukee) MSA, Oshkosh-Neenah, WI (Oshkosh) MSA and 14 non-MSA counties (Wisconsin Non-MSA), which examiners combined as one AA for analysis and presentation. Refer to Appendix A for a list of counties reviewed within each AA.

HNB did not have any branches in Wisconsin prior to its merger with FirstMerit in August 2016. HNB sold all Wisconsin branches and exited Wisconsin in June 2019.

Based on June 30, 2018, FDIC summary of deposit information, HNB had \$950.4 million of deposits in Wisconsin, which represented 1.1 percent of the bank's overall deposits. The bank originated and purchased \$269.6 million in loans or 1.0 percent of total bank loan originations and purchases during the evaluation period. The bank's primary loan products in Wisconsin were home mortgage loans and small loans to businesses.

HNB operated 31 branches, representing 3.2 percent of the bank's branches, and 31 ATMs. HNB ranked 18th out of 137 depository institutions with a 0.9 percent deposit market share. The top three depository institutions in terms of deposit market share were U.S. Bank, N.A. with a 23.9 percent market share,

⁹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

BMO Harris Bank, N.A. with a 14.3 percent market share, and Associated Bank, N.A. with an 11.9 percent market share.

Wisconsin Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wisconsin Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	168	0.0	8.9	73.2	15.5	2.4
Population by Geography	649,053	0.0	8.5	73.9	17.0	0.6
Housing Units by Geography	365,816	0.0	10.3	75.6	13.7	0.3
Owner-Occupied Units by Geography	198,260	0.0	8.0	73.9	18.1	0.0
Occupied Rental Units by Geography	69,466	0.0	12.9	74.7	11.1	1.4
Vacant Units by Geography	98,090	0.0	13.2	79.8	6.9	0.2
Businesses by Geography	36,583	0.0	9.7	75.4	14.7	0.2
Farms by Geography	3,195	0.0	2.8	79.1	18.1	0.0
Family Distribution by Income Level	174,412	16.7	19.1	22.8	41.4	0.0
Household Distribution by Income Level	267,726	21.6	16.9	18.8	42.8	0.0
Median Family Income Non-MSAs - WI		\$60,911	Median Housing Value			\$162,286
			Median Gross Rent			\$702
			Families Below Poverty Level			7.3%
Source: 2015 ACS and 2019 D&B Data						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification.						

The Wisconsin Non-MSA AA consisted of 14 non-metropolitan counties dispersed throughout the state. According to the FDIC's Summary of Deposits as of June 30, 2018, HNB's deposits in the AA comprised 0.4 percent of the bank's total deposits.

Within the Wisconsin Non-MSA AA, the bank had \$367.6 million in deposits and ranked eighth among 71 depository institutions in the AA with a 3.1 percent market share. The top three depository institutions in terms of deposit market share were BMO Harris Bank, N.A. with an 11.9 percent market share, Associated Bank, N.A. with a 9.5 percent market share, and Investors Community Bank with an 8.8 percent market share. HNB operated 14 branches and 13 ATMs in the AA.

The Moody's Analytics reports used to compose the Economic Data in other sections of this periodic evaluation do not cover any of the counties or cities within the Wisconsin Non-MSA AA. The information presented below originated from the following sources: Wisconsin Realtor's Association (WRA); Zillow.com; Realtor.com; the U.S. BLS; and Wikipedia.

The 14 Wisconsin Non-MSA counties represented a diverse set of economic scenarios. Some counties hold smaller populations because much of their area is comprised of lakes and the main employment is tourism and lake sports (Door, Lincoln, Vilas, and Oneida Counties). Other counties are farming communities, (Polk, Walworth, and Lafayette). Waushara County claims the title of the 'Christmas Tree

Capital of the World.’ These counties comprised more of the seasonal increases in unemployment, although none represented more than 4.1 percent at December 31, 2018. Other counties were manufacturing and production hubs including ethanol and bio-blend fuel plants, chemicals plants, logging, a paper mill, metal and plastics fabrication, a power systems plant, building ships, yachts and helicopters, car, airplane and emergency vehicle parts plants and a foundry that employs 1,500 people (Portage, Lafayette, Langlade, Walworth, Manitowoc, Jefferson, Waupaca, and Marinette). Food and beverage plants also were present in some of the counties, including breweries, food and beverages plants, and a cat food plant (Jefferson, Lafayette, and Waupaca).

Home prices in Wisconsin statewide, according to Zillow, increased an average of 5.6 percent in 2017 and another 5.3 percent in 2018 to \$180,000. Median prices in the counties varied between \$85,000 (Marinette) and \$222,000 (Waushara) in the two-year review period. However, median housing prices increased an average of 23.2 percent in seven of the 14 counties between December 2017 and December 2018. The other seven counties experienced primarily unexplained decreases of an average 9.5 percent in the median home price. Two of those counties (Manitowoc and Waupaca) also underwent modest decreases in population between 2017 and 2018. Lafayette County also experienced a decrease in population but realized an increase of the median home price of less than 1.0 percent.

Based on information in the above table, low-income families earned less than \$30,456 and moderate-income families earned less than \$48,729. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income. This calculated to a maximum monthly mortgage payment of \$761 for low-income borrowers and \$1,218 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$871. Low-income borrowers would be challenged to afford a mortgage loan in the Wisconsin Non-MSA AA.

According to the U.S. BLS, unemployment reached and held an average low of 3.0 percent in the state of Wisconsin for all of 2018, a decrease from an average 3.3 percent in 2017. Within the 14 counties comprising HNB’s Wisconsin Non-MSA AA, the unemployment rates during the 2017-2018 review period ranged from 6.6 percent in Door County, Wisconsin in January 2017, to 1.9 percent in Lafayette County in December 2017. Several of the 14 counties reached their lowest points of unemployment in the latter half of 2018. The tourism economy affects many of these counties and strongly boosts employment in the summer months when tourists visit the lakes. The lowest average unemployment rate of 3.1 percent for the 14 counties, occurred in July 2018.

Information provided by five community contacts, three affordable housing organizations and two community development organizations, identified the following needs within this AA:

- Affordable housing, including quality affordable rental housing.
- Small dollar loans.
- Lines of credit for small business cash flow.
- Credit counseling, financial literacy, and first-time homebuyer programs.

Scope of Evaluation in Wisconsin

Examiners selected the combined Wisconsin Non-MSA counties for a full-scope review. This area accounted for the largest portion of the state's lending, 30.6 percent, and the second largest portion of deposits, 38.9 percent. The Appleton MSA, Duluth MSA, Green Bay MSA, Madison MSA, Milwaukee MSA, and Oshkosh MSA AAs received limited-scope reviews.

Examiners based the ratings on the results of the area that received a full-scope review and the bank's performance in the limited-scope areas, as applicable. The Green Bay MSA and Wisconsin Non-MSA AAs were the most heavily weighted when arriving at the overall conclusion for the state of Wisconsin.

Examiners placed more emphasis on the loan product that had the higher percentage of lending within the AA. In the Wisconsin Non-MSA, Madison MSA, Milwaukee MSA, and Oshkosh MSA AAs, HMDA loans represented the majority of HNB's lending. In the Appleton MSA and Green Bay MSA AAs, small loans to businesses represented the majority of HNB's lending. In the Duluth MSA AA, HMDA and small loans to businesses were weighted equally. There were no low-income geographies within the Wisconsin Non-MSA, Appleton MSA, or Oshkosh MSA AAs; therefore, geographic distribution conclusions are based on performance in moderate-income geographies in those AAs. HNB did not originate enough small loans to farms in any of the AAs to conduct any meaningful analyses.

Examiners did not analyze 2016 or 2019 data for Wisconsin as insufficient data existed to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

The bank's performance under the Lending Test in Wisconsin is rated Outstanding

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Wisconsin Non-MSA AA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans 2017 - 2018*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Wisconsin Non-MSA	421	274	13	2	710	35.3	38.7
Limited-Scope:							
Appleton MSA	99	104	2	0	205	10.2	6.9
Duluth MSA	15	15	0	0	30	1.5	1.6
Green Bay MSA	200	241	12	3	456	22.7	44.3
Madison MSA	101	85	5	1	192	9.6	1.5
Milwaukee MSA	195	113	0	2	310	15.4	2.3
Oshkosh MSA	56	44	7	0	107	5.3	4.8
Total	1,087	876	39	8	2,010	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans 2017 - 2018* (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Wisconsin Non-MSA	\$58,890	\$20,918	\$453	\$2,334	\$82,595	30.6	38.7
Limited-Scope:							
Appleton MSA	\$15,791	\$10,184	\$77	\$0	\$26,052	9.7	6.9
Duluth MSA	\$1,503	\$407	\$0	\$0	\$1,910	0.7	1.6
Green Bay MSA	\$22,419	\$20,515	\$1,282	\$2,789	\$47,005	17.4	44.3
Madison MSA	\$25,850	\$7,929	\$579	\$1,965	\$36,323	13.5	1.5
Milwaukee MSA	\$41,650	\$14,606	\$0	\$6,588	\$62,844	23.3	2.3
Oshkosh MSA	\$8,286	\$3,599	\$965	\$0	\$12,850	4.8	4.8
Total	\$174,389	\$78,158	\$3,356	\$13,676	\$269,579	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

HNB ranked eighth in deposits out of 71 depository institutions (top 12 percent), with a 3.1 percent market share in the AA. In overall HMDA lending, HNB ranked 18th out of 553 lenders (top 4 percent) with a 1.4 percent market share. The three top lenders in terms of market share were Associated Bank, N.A. with a 5.5 percent market share, Covantage Credit Union with a 4.6 percent market share, and BMO Harris Bank, N.A. with a 3.8 percent market share.

For small loans to businesses, HNB ranked 16th out of 99 lenders (top 17 percent) with a market share of 1.4 percent. The top three lenders in terms of market share were U.S. Bank, N.A. with a 19.1 percent market share, Chase Bank USA, NA. with a 13.4 percent market share, and American Express National Bank with a 10.1 percent market share. All three of these lenders issue significant numbers of small business credit cards as a primary business.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

- For 2017 – 2018, the proportion of home mortgage loans in moderate-income geographies approximated the proportion of OOUs and equaled the aggregate distribution of loans in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was adequate.

- For 2017 – 2018, the proportion of small business loans in moderate-income geographies was below the proportion of small businesses located in those geographies but near-to the aggregate distribution of loans to small business in those geographies.

Lending Gap Analysis

The OCC analyzed HNB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent.

- For 2017 – 2018, the proportion of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate distribution of all reporting lenders in the AA.
- For 2017 – 2018, the proportion of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate distribution of all reporting lenders in the AA.

Small Loans to Businesses

Refer to Table R in the Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

- For 2017 – 2018, the percentage of small loans to businesses with revenues of \$1 million or less was near-to the percentage of small businesses in the AA but exceeded the aggregate distribution of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Wisconsin Non-MSA AA was excellent considering the shortened evaluation period. HNB made two CD Loans for a total of \$2.3 million, which represented 5.1 percent of tier 1 capital allocated to the AA. HNB originated a Small Business Administration loan totaling \$1.3 million to finance a small business allowing it to retain 10 jobs in the AA. HNB originated a \$1 million affordable housing loan to a nonprofit that offers residential and vocational programs to LMI individuals with developmental disabilities to support community inclusion, independence, and empowerment.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs.

Under the bank's *Community Access Mortgage* program, the bank funded one first-time homebuyer mortgage loan totaling \$43,000. Under the *HomeTown Mortgage* loan program, the bank funded one first-time homebuyer mortgage loan totaling \$103,000. The bank also made six unsecured home improvement loans totaling \$16,000 and 26 loans under the *Debt Manager* program totaling \$383,000.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Duluth MSA, Green Bay MSA, Madison MSA, and Milwaukee MSA AAs was consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance in the Appleton MSA and Oshkosh MSA AAs was weaker than the bank's overall performance under the Lending test in the full-scope area due to lower levels of CD lending. Performance in the limited-scope AAs did not affect the bank's overall Lending Test rating for the state of Wisconsin.

Refer to Tables O through T in the state of Wisconsin sections of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Wisconsin is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Wisconsin Non-MSA AA was good.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Wisconsin Non-MSA	2	3	28	1,743	30	25.9	1,746	25.5	0	0
Limited-Scope										
Appleton MSA	0	0	2	5	2	1.7	5	0.1	0	0
Duluth MSA	0	0	0	0	0	0.0	0	0.0	0	0
Green Bay MSA	1	16	22	2,246	23	19.8	2,262	33.0	0	0
Madison MSA	2	74	9	511	11	9.5	585	8.5	1	20
Milwaukee MSA	5	370	40	339	45	38.8	709	10.4	1	206
Oshkosh MSA	1	40	4	1,504	5	4.3	1,544	22.5	0	0
Total	11	503	105	6,348	116	100.0	6,851	100.0	2	226

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

*** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 3.7 percent of tier 1 capital allocated to the AA.

The institution exhibited good responsiveness to credit and community economic development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. The bank had two LIHTC project investments for \$1.6 million. The bank's grants and donations, totaling \$17,100 were to community service organizations that provided services to LMI individuals, primarily affordable housing and foodbanks.

Examples of CD investments made in the AA:

- HNB invested \$1.5 million in an LIHTC-eligible affordable housing project with two properties located in the AA, one with 28 units and the other with 20 units, for individuals making less than 60 percent of the AMI.
- HPC made a \$135,000 lease purchase investment in an essential use vehicle for a small city in the AA, located in a distressed and underserved tract.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Green Bay MSA, Madison MSA, Milwaukee MSA, and Oshkosh MSA AAs was stronger than the bank's overall performance under the Investment Test in the full-scope area due to higher levels of qualified investments. The bank's performance under the Investment Test in the Appleton MSA and Duluth MSA AAs was weaker than the bank's overall performance under the Investment test in the full-scope area due to minimal levels of qualified investments. The institution's performance under the Investment Test in the combined limited-scope areas had a neutral impact on the overall Investment Test rating for the state of Wisconsin.

SERVICE TEST

The bank's performance under the Service Test in Wisconsin is rated High Satisfactory. The weaker combined Service Test performance in the limited-scope AAs negatively affected the bank's overall Service Test rating for the state of Wisconsin.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Wisconsin Non-MSA AA was excellent.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)**				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Wisconsin Non-MSA	38.7	14	43.8	0.00	14.3	71.4	14.3	0.0	8.5	73.9	17.0
Limited-Scope:											
Appleton MSA	6.9	2	6.3	0.0	50.0	50.0	0.0	0.0	13.7	76.5	9.8
Duluth MSA	1.6	1	3.1	100.0	0.0	0.0	0.0	11.9	14.5	57.1	16.5
Green Bay MSA	44.3	9	28.1	0.0	22.2	77.8	0.0	1.9	24.1	50.5	23.2
Madison MSA	1.5	2	6.3	0.0	50.0	0.0	50.0	3.9	15.1	50.8	26.9
Milwaukee MSA	2.3	2	6.3	0.0	0.0	50.0	50.0	19.4	17.3	29.7	33.6
Oshkosh MSA	4.8	2	6.3	0.00	0.00	50.0	50.0	0.0	15.4	62.3	22.3

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** May not add up to 100.0 percent due to geographies with unknown geography income level and rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

HNB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 13 ATMs in the AA.

Distribution of Branch Openings/Closings*						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Wisconsin Non-MSA	0	4	0	0	-3	-1
Limited-Scope						
Appleton MSA	0	1	0	0	-1	0
Duluth MSA	0	0	0	0	0	0
Green Bay MSA	0	0	0	0	0	0
Madison MSA	0	0	0	0	0	0
Milwaukee MSA	0	0	0	0	0	0
Oshkosh MSA	0	1	0	0	-1	0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes had been made, the institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed four branches, none of which were in a moderate-income geography. The bank did not open any branches.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AAs, particularly low- and moderate-income geographies and/or individuals. HNB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open Monday through Thursday from 9:00 am to 5:00 pm and Friday from 9:00 am to 6:00 pm.

Community Development Services

The institution provided a significant level of CD services.

Employees provided financial or job-specific expertise and/or technical assistance for 125 CD service activities to 24 organizations, aggregating 619.5 qualified hours within this AA. The majority of the bank's assistance of 434 hours was to organizations that provide community services to LMI individuals and families, including financial literacy and first-time homebuyer education. Nine bank employees spent 92 hours serving on the boards of directors or committees of seven community development organizations.

The following are examples of CD services provided in this AA:

- Nineteen bank employees taught financial literacy classes to students in several junior-high and high schools, using a financial literacy game created by HNB staff. The schools' students were 52 to 75 percent eligible for free or reduced fee lunches.
- One HNB employee served on the board of directors for an organization that provided medical and dental services to low-income individuals.
- One bank employee served on the board of directors for a small city's housing authority, whose mission was to provide, develop, and administer safe, quality affordable housing opportunities for the elderly, handicapped, and low-income families, promoting independence and self-sufficiency.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Appleton MSA AA was consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance under the Service Test in the Duluth MSA, Green Bay MSA, Madison MSA, Milwaukee MSA, and Oshkosh MSA AAs was weaker than the bank's overall performance under the Service Test in the full-scope area due to poorer branch distributions in low- and moderate-income geographies. Performance in the limited-scope AAs negatively affected the overall Service Test rating for the state of Wisconsin.

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/1/2016 to 12/31/2019	
Bank Products Reviewed:	Home mortgage loans, small business loans, small farm loans, community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Huntington CDC	Affiliate	Qualified Investments and CD Loans
Huntington Foundation	Affiliate	Donations
Huntington Akron Foundation	Affiliate	Donations
Huntington Public Capital	Affiliate	Qualified Investments and CD Loans
Huntington Mezzanine	Affiliate	Qualified Investments and CD Loans (SBICs)
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Cincinnati MMSA	Full-Scope	Ohio: Butler, Clermont, Hamilton, and Warren Counties Kentucky: Boone, Campbell, and Kenton Counties
Weirton MMSA	Full-Scope	West Virginia: Hancock County Ohio: Jefferson County
Wheeling MMSA	Full-Scope	West Virginia: Ohio County (1/1/2016 to 9/29/2017) Ohio: Belmont County
Youngstown MMSA	Full-Scope	Ohio: Mahoning and Trumbull Counties Pennsylvania: Mercer County
Florida		
Naples MSA	Full-Scope	Collier County
Illinois		
Chicago MSA	Full-Scope	Cook, DuPage, Kane, Lake (Illinois), McHenry, and Will Counties
Indiana		
Indianapolis MSA	Full-Scope	Boone, Hamilton, Hendricks, Johnson, Madison, and Marion Counties
Lafayette MSA	Limited-Scope	Tippecanoe County
Michigan		
Detroit MSA	Full-Scope	Lapeer, Livingston, Macomb, Oakland, Saint Clair, and Wayne Counties
Ann Arbor MSA	Limited-Scope	Washtenaw County
Battle Creek MSA	Limited-Scope	Calhoun County
Bay City MSA	Limited-Scope	Bay County
Benton Harbor MSA	Limited-Scope	Berrien County
Flint MSA	Limited-Scope	Genesee County
Grand Rapids MSA	Limited-Scope	Ionia, Kent, Montcalm, and Ottawa Counties
Jackson MSA	Limited-Scope	Jackson County
Kalamazoo MSA	Limited-Scope	Kalamazoo and Van Buren Counties
Lansing MSA	Limited-Scope	Clinton, Eaton, and Ingham Counties
Midland MSA	Limited-Scope	Midland County

List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Monroe MSA	Limited-Scope	Monroe County
Muskegon MSA	Limited-Scope	Muskegon County
Saginaw MSA	Limited-Scope	Saginaw County
South Bend MSA	Limited-Scope	Cass County
Michigan Combined Non-Metro	Limited-Scope	Allegan, Alpena, Antrim, Arenac, Branch, Charlevoix, Chippewa, Crawford, Delta, Dickinson, Emmet, Gogebic, Grand Traverse, Gratiot, Houghton, Iron, Kalkaska, Leelanau, Lenawee, Manistee, Marquette, Mecosta, Newaygo, Oceana, Osceola, Oscoda, Otsego, Shiawassee, St. Joseph, Tuscola, and Wexford Counties
Ohio		
Akron MSA	Full-Scope	Portage and Summit Counties
Cleveland MSA	Full-Scope	Cuyahoga, Geauga, Lake, Lorain, and Medina Counties
Columbus MSA	Full-Scope	Delaware, Fairfield, Franklin, Licking, Madison, Pickaway, and Union Counties
Canton MSA	Limited-Scope	Carroll and Stark Counties
Dayton MSA	Limited-Scope	Greene, Miami, and Montgomery Counties
Lima MSA	Limited-Scope	Allen County
Mansfield MSA	Limited-Scope	Richland County
Springfield MSA	Limited-Scope	Clark County
Toledo MSA	Limited-Scope	Fulton, Lucas, and Wood Counties
Ohio Combined Non-Metro	Limited-Scope	Ashland, Ashtabula, Columbiana, Crawford, Defiance, Erie, Fayette, Guernsey, Hancock, Hardin, Harrison, Henry, Huron, Knox, Logan, Marion, Muskingum, Ottawa, Putnam, Ross, Sandusky, Seneca, Tuscarawas, Washington, Wayne, Williams, and Wyandot Counties
Pennsylvania		
Pittsburgh MSA	Full-Scope	Alleghany, Beaver, Butler, Washington, and Westmoreland Counties
Erie MSA	Limited-Scope	Erie County
Pennsylvania Combined Non-Metro	Limited-Scope	Lawrence County
West Virginia		
Morgantown MSA	Full-Scope	Monongalia County
Charleston MSA	Limited-Scope	Kanawha County
Huntington MSA	Limited-Scope	Cabell, Putnam, and Wayne Counties
Parkersburg MSA	Limited-Scope	Wood County
West Virginia Combined Non-Metro	Limited-Scope	Harrison, Lewis, Marion, Randolph, and Ritchie Counties
Wisconsin		
Wisconsin Combined Non-Metro	Full-Scope	Door, Jefferson, Lafayette, Langlade, Lincoln, Manitowoc, Marinette, Oneida, Polk, Portage, Vilas, Walworth, Waupaca, and Waushara Counties
Appleton MSA	Limited-Scope	Calumet and Outagamie Counties
Duluth MSA	Limited-Scope	Douglas County
Green Bay MSA	Limited-Scope	Brown, Kewaunee, and Oconto Counties
Madison MSA	Limited-Scope	Dane and Green Counties
Milwaukee MSA	Limited-Scope	Milwaukee and Waukesha Counties
Oshkosh MSA	Limited-Scope	Winnebago County

Appendix B: Summary of MMSA and State Ratings

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

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017 – 2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Cincinnati MMSA	10,953	1,992,119	100.0	70,371	4.2	3.3	3.4	14.3	11.5	13.6	42.3	40.8	43.3	39.2	44.2	39.6	0.1	0.1	0.1	
Weirton MMSA	798	61,280	100.0	1,976	1.7	1.4	0.8	8.4	6.5	6.8	77.9	79.3	79.0	12.0	12.8	13.4	0.0	0.0	0.0	
Wheeling MMSA	504	56,519	100.0	2,243	0.0	0.0	0.0	15.1	15.5	12.4	64.2	58.5	62.9	20.7	26.0	24.7	0.0	0.0	0.0	
Youngstown MMSA	5,077	483,476	100.0	14,047	5.1	2.2	1.3	12.5	11.0	8.0	53.0	53.3	56.3	29.3	33.5	34.3	0.0	0.0	0.0	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017 – 2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Cincinnati MMSA	10,953	1,992,119	100.0	70,371	21.9	9.0	9.8	16.4	20.8	19.8	19.8	22.9	20.6	42.0	46.9	36.2	0.0	0.5	13.6	
Weirton MMSA	798	61,280	633.3	1,976	19.4	10.7	10.4	19.4	24.4	22.2	21.4	28.3	25.4	39.8	36.5	31.3	0.0	0.1	10.7	
Wheeling MMSA	504	56,519	475.5	2,243	18.8	10.7	9.5	19.3	22.0	20.8	20.5	25.8	22.5	41.4	41.3	35.0	0.0	0.2	12.2	
Youngstown MMSA	5,077	483,476	100.0	14,047	20.5	13.9	9.5	18.4	25.6	21.5	20.6	26.4	24.7	40.5	33.6	32.3	0.0	0.5	12.1	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2017 – 2019	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Cincinnati MMSA	3,691	420,366	100.0	36,123	7.0	9.2	7.2	17.7	19.6	19.0	35.7	32.0	33.8	38.6	38.6	39.1	1.0	0.7	0.8
Weirton MMSA	180	11,625	100.0	1,073	1.4	1.1	0.8	15.0	10.0	15.7	69.9	70.0	73.3	13.7	18.9	10.3	0.0	0.0	0.0
Wheeling MMSA	131	4,585	100.0	1,405	0.0	0.0	0.0	24.6	20.6	28.6	54.3	57.3	51.9	21.1	22.1	19.5	0.0	0.0	0.0
Youngstown MMSA	1,708	133,747	100.0	8,108	7.7	7.8	7.3	12.3	12.4	11.1	44.6	46.7	43.4	35.3	33.1	38.2	0.0	0.0	0.0
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017 – 2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Full-Scope:												
Cincinnati MMSA	3,691	420,366	100.0	36,123	82.4	59.7	48.0	6.2	39.3	11.5	1.0	
Weirton MMSA	180	11,625	100.0	1,073	79.9	77.2	39.9	5.3	21.7	14.8	1.1	
Wheeling MMSA	131	4,585	100.0	1,405	78.2	67.9	35.3	6.6	30.5	15.2	1.5	
Youngstown MMSA	1,708	133,747	100.0	8,108	80.8	70.3	44.5	6.4	29.2	12.9	0.5	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%												

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017 – 2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Cincinnati MMSA	51	3,982	100.0	227	3.6	0.0	0.4	12.8	15.7	5.7	48.6	41.2	62.1	34.9	43.1	31.7	0.2	0.0	0.0		
Weirton MMSA	2	65	100.0	21	0.6	0.0	0.0	5.8	0.0	0.0	83.8	100.0	95.2	9.7	100.0	4.8	0.0	0.0	0.0		
Wheeling MMSA	0	0	100.0	23	0.0	0.0	0.0	9.9	0.0	4.3	70.7	0.0	82.6	19.4	0.0	13.0	0.0	0.0	0.0		
Youngstown MMSA	33	1,636	100.0	172	2.0	0.0	0.0	6.4	0.0	2.3	55.9	45.5	58.7	35.7	54.5	39.0	0.0	0.0	0.0		
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																					

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017 – 2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Full-Scope:												
Cincinnati MMSA	51	3,982	100.0	227	96.2	74.5	58.6	1.8	25.5	2.0	0.0	
Weirton MMSA	2	65	100.0	21	98.1	100.0	61.9	0.6	0.0	1.3	0.0	
Wheeling MMSA	0	0	100.0	23	97.3	0.0	39.1	1.4	0.0	1.4	0.0	
Youngstown MMSA	33	1,636	100.0	172	97.2	78.8	54.1	1.5	21.2	1.3	0.0	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%												

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017 – 2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope:																					
Naples MSA	164	87,691	100.0	14,305	2.3	0.6	1.2	16.3	10.4	16.2	41.3	30.5	42.1	40.1	58.5	40.5	0.0	0.0	0.0		
Total	164	87,691	100.0	14,305	2.3	0.6	1.2	16.3	10.4	16.2	41.3	30.5	42.1	40.1	58.5	40.5	0.0	0.0	0.0		
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017 – 2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Naples MSA	164	87,691	100.0	14,305	20.8	1.2	3.5	17.7	1.8	12.5	19.3	3.7	18.2	42.2	84.1	50.5	0.0	9.1	15.3	
Total	164	87,691	100.0	14,305	20.8	1.2	3.5	17.7	1.8	12.5	19.3	3.7	18.2	42.2	84.1	50.5	0.0	9.1	15.3	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017 – 2019
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Naples MSA	57	13,327	100.0	12,624	2.7	0.0	2.6	13.5	14.0	10.9	39.0	43.9	39.8	44.8	42.1	46.8	0.0	0.0	0.0
Total	57	13,327	100.0	12,624	2.7	0.0	2.6	13.5	14.0	10.9	39.0	43.9	39.8	44.8	42.1	46.8	0.0	0.0	0.0
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2017 – 2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Naples MSA	57	13,327	100.0	12,624	91.8	66.7	45.9	3.1	33.3	5.2	0.0
Total	57	13,327	100.0	12,624	91.8	66.7	45.9	3.1	33.3	5.2	0.0
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017 – 2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Chicago MSA	9,549	2,701,230	100.0	235,543	4.5	3.6	3.8	18.0	13.3	15.8	34.4	25.6	34.0	43.0	57.3	46.3	0.1	0.2	0.1
Total	9,549	2,701,230	100.0	235,543	4.5	3.6	3.8	18.0	13.3	15.8	34.4	25.6	34.0	43.0	57.3	46.3	0.1	0.2	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017 – 2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Chicago MSA	9,549	2,701,230	100.0	235,543	23.5	4.2	7.1	16.3	12.1	17.3	18.5	17.9	20.7	41.7	64.8	38.4	0.0	1.0	16.6
Total	9,549	2,701,230	100.0	235,543	23.5	4.2	7.1	16.3	12.1	17.3	18.5	17.9	20.7	41.7	64.8	38.4	0.0	1.0	16.6
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017 – 2019		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Chicago MSA	2,671	358,051	100.0	213,167	4.9	3.0	3.9	15.4	14.9	16.1	29.0	38.1	31.1	50.2	43.7	48.6	0.5	0.4	0.3		
Total	2,671	358,051	100.0	213,167	4.9	3.0	3.9	15.4	14.9	16.1	29.0	38.1	31.1	50.2	43.7	48.6	0.5	0.4	0.3		
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017 – 2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Full-Scope:												
Chicago MSA	2,671	358,051	100.0	213,167	83.8	61.7	43.0	6.7	36.8	9.5	1.5	
Total	2,671	358,051	100.0	213,167	83.8	61.7	43.0	6.7	36.8	9.5	1.5	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%												

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2017 – 2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Chicago MSA	22	2,914	100.0	504	3.4	0.0	1.0	15.2	0.0	7.1	37.8	63.6	46.8	43.5	36.4	45.0	0.1	0.0	0.0
Total	22	2,914	100.0	504	3.4	0.0	1.0	15.2	0.0	7.1	37.8	63.6	46.8	43.5	36.4	45.0	0.1	0.0	0.0
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues										2017 – 2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Chicago MSA	22	2,914	100.0	504	93.3	68.2	49.8	4.1	31.8	2.6	0.0
Total	22	2,914	100.0	504	93.3	68.2	49.8	4.1	31.8	2.6	0.0
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2017 – 2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Indianapolis MSA	7,326	1,052,526	92.1	51,150	8.7	7.0	5.9	22.7	23.7	20.0	40.2	35.6	40.7	28.4	33.7	33.3	0.1	0.0	0.0	
Limited-Scope:																				
Lafayette MSA	628	79,000	7.9	5,715	1.1	0.5	1.3	16.2	20.2	16.5	35.3	38.2	33.4	47.3	41.1	48.4	0.1	0.0	0.3	
Total	7,954	1,131,526	100.0	56,865	8.0	6.5	5.5	22.1	23.4	19.6	39.7	35.8	40.0	30.2	34.3	34.8	0.1	0.0	0.1	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2017 – 2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Indianapolis MSA	7,326	1,052,526	92.1	51,150	25.6	16.7	12.3	18.7	26.3	22.6	19.9	22.4	20.4	35.9	33.7	28.7	0.0	0.9	16.0	
Limited-Scope:																				
Lafayette MSA	628	79,000	7.9	5,715	20.5	15.1	9.7	15.7	28.7	21.7	23.0	24.4	21.1	40.8	31.8	32.2	0.0	0.0	15.4	
Total	7,954	1,131,526	100.0	56,865	25.1	16.6	12.0	18.4	26.5	22.5	20.2	22.5	20.5	36.3	33.6	29.1	0.0	0.9	16.0	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2017 – 2019		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Indianapolis MSA	2,005	176,246	93.6	23,071	12.8	9.7	11.1	24.6	19.6	22.0	36.1	40.4	36.9	26.3	29.8	29.8	0.2	0.4	0.3	
Limited-Scope:																				
Lafayette MSA	137	7,965	6.4	1,995	4.7	1.5	5.0	30.2	33.6	32.8	26.3	33.6	26.3	34.6	28.5	33.8	4.2	2.9	2.1	
Total	2,142	184,211	100.0	25,066	12.2	9.2	10.6	25.1	20.5	22.8	35.3	40.0	36.0	27.0	29.7	30.2	0.5	0.6	0.4	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017 – 2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Full-Scope:												
Indianapolis MSA	2,005	176,246	93.6	23,071	84.0	65.6	41.1	5.4	33.0	10.6	1.4	
Limited-Scope:												
Lafayette MSA	137	7,965	6.4	1,995	82.3	73.0	43.7	4.8	25.5	12.9	1.5	
Total	2,142	184,211	100.0	25,066	83.9	66.1	41.3	5.4	32.5	10.7	1.4	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%												

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2017 – 2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Indianapolis MSA	20	1,685	95.2	286	6.9	5.0	0.7	15.9	0.0	4.5	50.3	75.0	74.1	26.8	20.0	20.6	0.2	0.0	0.0	
Limited-Scope:																				
Lafayette MSA	1	20	4.8	89	1.3	0.0	0.0	10.7	0.0	4.5	37.3	100.0	51.7	50.7	0.0	43.8	0.0	0.0	0.0	
Total	21	1,705	100.0	375	6.1	4.8	0.5	15.1	0.0	4.5	48.5	76.2	68.8	30.2	19.0	26.1	0.2	0.0	0.0	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017 – 2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Full-Scope:												
Indianapolis MSA	20	1,685	95.2	286	96.2	65.0	53.1	2.1	35.0	1.7	0.0	
Limited-Scope:												
Lafayette MSA	1	20	4.8	89	96.2	100.0	37.1	1.7	0.0	2.1	0.0	
Total	21	1,705	100.0	375	96.2	66.7	49.3	2.0	33.3	1.7	0.0	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%												

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017 – 2019**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Detroit MSA	14,011	2,430,432	38.1	134,278	6.1	3.4	2.5	20.4	19.1	15.8	37.0	38.4	39.4	36.5	39.0	42.3	0.1	0.0	0.0
Limited-Scope:																			
Ann Arbor MSA	1,202	256,715	3.3	11,054	6.6	12.0	7.5	12.0	17.0	12.3	44.7	38.1	46.1	36.5	32.5	33.9	0.2	0.4	0.2
Battle Creek MSA	184	15,530	0.5	3,417	5.2	5.4	2.7	21.1	21.2	18.6	42.7	40.2	41.8	31.0	33.2	36.9	0.0	0.0	0.0
Bay City MSA	409	34,953	1.1	2,498	0.7	1.5	0.8	19.9	22.2	21.4	50.4	49.6	46.9	29.1	26.7	30.9	0.0	0.0	0.0
Flint MI MSA	1,386	146,292	3.8	11,057	8.5	2.7	1.5	14.9	8.7	5.1	38.5	39.3	40.3	38.1	49.3	53.0	0.0	0.0	0.0
Grand Rapids MSA 17-18	3,910	567,470	10.6	36,807	2.0	3.0	2.4	16.9	17.3	16.5	51.8	50.6	51.8	29.3	29.1	29.3	0.0	0.0	0.0
Grand Rapids MSA 19	2,622	384,234	7.1	38,650	1.7	1.8	2.3	16.9	13.7	16.2	52.7	51.9	52.8	28.6	32.6	28.7	0.0	0.0	0.0
Jackson MSA	882	94,137	2.4	4,820	5.7	6.5	3.8	15.6	18.3	15.2	53.7	47.7	53.5	25.0	27.6	27.4	0.0	0.0	0.0
Kalamazoo MSA	433	66,704	1.2	8,020	4.9	8.5	3.3	11.1	12.2	10.7	50.7	42.0	48.4	33.3	37.2	37.5	0.1	0.0	0.1
Lansing MSA	1,426	187,652	3.9	15,327	2.5	3.1	2.8	16.5	14.9	14.1	50.8	51.2	49.2	30.1	30.6	33.7	0.1	0.2	0.2
Midland MSA	190	28,512	0.5	2,397	1.7	1.1	1.5	17.5	12.6	15.6	44.7	50.5	43.0	36.1	35.8	39.8	0.0	0.0	0.0
Monroe MSA	1,224	142,622	3.3	5,260	0.5	0.0	0.2	10.2	8.4	9.6	74.9	76.7	75.0	14.3	14.9	15.2	0.0	0.0	0.0
Muskegon MSA	1,253	133,021	3.4	5,642	5.0	2.5	2.2	18.8	20.3	17.4	41.9	38.9	43.9	34.3	38.3	36.5	0.0	0.0	0.0
Niles MSA	231	42,190	0.6	4,747	5.7	0.9	1.6	13.7	25.5	13.0	49.5	57.1	52.4	31.1	16.5	32.9	0.0	0.0	0.0
Saginaw MSA	691	71,069	1.9	3,768	7.8	3.6	1.7	9.6	6.4	4.0	54.8	54.4	59.4	27.8	35.6	34.9	0.0	0.0	0.0
Michigan Non-MSA 17-18	4,155	542,528	11.3	57,603	0.0	0.0	0.0	8.9	9.4	7.1	69.3	61.9	66.5	21.8	28.7	26.4	0.0	0.0	0.0
Michigan Non-MSA 19	2,538	354,801	6.9	27,960	0.0	0.0	0.0	8.9	7.7	6.9	69.4	59.1	66.1	21.7	33.2	27.0	0.0	0.0	0.0
Total	36,747	5,498,862	100.0	345,505	4.5	2.8	2.3	16.8	15.4	13.9	46.5	47.4	46.6	32.2	34.3	37.0	0.1	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2017 – 2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Detroit MSA	14,011	2,430,432	38.1	134,278	22.9	11.4	9.5	16.7	20.5	19.6	18.9	23.1	22.6	41.4	43.8	36.8	0.0	1.3	11.5
Limited-Scope:																			
Ann Arbor MSA	1,202	256,715	3.3	11,054	22.7	13.3	9.0	17.0	22.1	20.2	19.6	20.5	22.6	40.7	43.9	37.6	0.0	0.2	10.5
Battle Creek MSA	184	15,530	0.5	3,417	21.7	13.6	7.5	17.8	25.5	19.2	19.6	25.5	23.1	40.9	34.8	37.5	0.0	0.5	12.6
Bay City MSA	409	34,953	1.1	2,498	19.5	17.8	12.1	18.1	24.5	22.9	22.2	24.2	24.3	40.2	32.8	28.6	0.0	0.7	12.2
Flint MI MSA	1,386	146,292	3.8	11,057	23.6	9.8	5.8	15.4	19.6	17.6	20.0	25.7	24.2	41.0	44.1	38.0	0.0	0.8	14.4
Grand Rapids MSA 17-18	3,910	567,470	10.6	36,807	19.7	10.5	9.2	18.0	23.6	22.5	22.3	24.6	23.4	39.9	40.2	34.3	0.0	1.2	10.6
Grand Rapids MSA 19	2,622	384,234	7.1	38,650	19.6	8.1	9.1	18.0	23.8	22.5	22.3	26.4	23.5	40.2	41.6	34.2	0.0	0.2	10.7
Jackson MSA	882	94,137	2.4	4,820	22.3	13.9	9.3	17.5	26.3	18.8	20.2	27.4	25.7	40.0	32.1	34.4	0.0	0.2	11.8
Kalamazoo MSA	433	66,704	1.2	8,020	20.5	9.9	11.2	16.6	16.9	20.4	20.0	24.2	21.4	42.9	47.6	36.5	0.0	1.4	10.4
Lansing MSA	1,426	187,652	3.9	15,327	21.0	15.5	10.4	17.3	27.1	23.5	20.7	23.3	23.6	41.0	33.2	31.3	0.0	1.0	11.3
Midland MSA	190	28,512	0.5	2,397	20.1	11.6	11.2	17.6	24.2	21.1	20.7	23.2	21.9	41.5	40.5	34.7	0.0	0.5	11.1
Monroe MSA	1,224	142,622	3.3	5,260	19.3	12.6	10.3	18.8	26.4	24.0	22.2	27.6	25.6	39.7	32.9	28.3	0.0	0.5	11.8
Muskegon MSA	1,253	133,021	3.4	5,642	21.7	10.8	10.1	17.0	25.5	23.3	20.6	24.6	23.1	40.7	38.5	28.3	0.0	0.6	15.2
Niles MSA	231	42,190	0.6	4,747	22.6	14.7	7.0	17.0	24.2	16.4	19.4	18.2	20.8	40.9	41.6	46.6	0.0	1.3	9.2
Saginaw MSA	691	71,069	1.9	3,768	21.2	13.0	7.5	17.1	22.6	20.7	20.7	24.5	24.2	41.0	39.4	36.6	0.0	0.6	11.0
Michigan Non-MSA 17-18	4,155	542,528	11.3	57,603	18.1	9.0	6.7	17.5	21.1	18.1	22.2	25.8	23.1	42.2	43.3	40.6	0.0	0.8	11.5
Michigan Non-MSA 19	2,538	354,801	6.9	27,960	18.1	7.3	6.7	17.5	18.6	17.8	22.2	26.4	22.9	42.2	47.6	41.2	0.0	0.1	11.4
Total	36,747	5,498,862	100.0	373,305	21.6	10.8	9.1	17.0	21.9	20.1	20.1	24.4	22.9	41.2	42.0	36.4	0.0	0.9	11.5
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2017 – 2019		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Detroit MSA	6,459	808,882	46.5	89,279	7.8	7.7	6.9	21.2	21.6	19.9	31.1	32.8	30.8	39.3	37.0	41.8	0.6	0.9	0.5	
Limited-Scope																				
Ann Arbor MSA	309	36,350	2.2	7,475	8.9	8.4	7.3	9.2	7.8	10.2	42.7	49.5	45.0	32.0	31.1	31.8	7.2	3.2	5.7	
Battle Creek MSA	54	4,597	0.4	1,219	8.6	16.7	9.1	26.3	35.2	26.9	33.6	25.9	32.1	31.4	22.2	31.9	0.0	0.0	0.0	
Bay City MSA	106	4,909	0.8	1,132	1.6	1.9	1.2	28.6	26.4	26.1	43.3	50.0	41.9	26.6	21.7	30.8	0.0	0.0	0.0	
Flint MI MSA	589	91,384	4.2	4,891	10.0	9.2	7.2	13.2	14.6	9.7	43.3	49.4	43.0	33.1	26.8	39.9	0.4	0.0	0.2	
Grand Rapids MSA 17-18	1,855	206,273	13.4	17,611	3.4	3.8	3.5	17.4	13.6	15.8	47.9	55.1	48.3	31.3	27.5	32.4	0.0	0.0	0.0	
Grand Rapids MSA 19	821	98,057	5.9	18,098	3.1	4.8	3.4	17.6	16.6	15.6	48.3	50.2	49.0	31.0	28.5	32.0	0.0	0.0	0.0	
Jackson MSA	171	24,473	1.2	1,807	9.7	11.1	11.2	28.6	24.0	25.1	40.6	42.1	41.0	20.8	22.8	22.7	0.3	0.0	0.0	
Kalamazoo MSA	154	24,334	1.1	3,832	8.4	9.1	8.0	20.3	13.0	18.0	46.1	49.4	42.8	24.6	28.6	31.1	0.6	0.0	0.2	
Lansing MSA	596	64,659	4.3	6,789	6.9	8.1	9.7	20.1	15.1	15.9	40.5	38.6	38.1	29.9	36.2	34.7	2.6	2.0	1.5	
Midland MSA	42	6,791	0.3	1,138	6.3	2.4	8.3	21.3	16.7	18.1	31.2	16.7	35.5	41.2	64.3	38.1	0.0	0.0	0.0	
Monroe MSA	211	12,684	1.5	1,895	0.8	0.0	0.7	15.3	10.0	11.6	71.8	82.9	75.0	12.1	7.1	12.7	0.0	0.0	0.0	
Muskegon MSA	315	29,278	2.3	1,978	8.7	9.5	9.6	21.6	31.7	26.2	34.6	30.2	32.3	35.1	28.6	31.9	0.0	0.0	0.0	
Niles MSA	66	6,285	0.5	2,171	10.5	9.1	8.2	11.6	27.3	8.6	43.9	34.8	46.0	34.1	28.8	37.2	0.0	0.0	0.0	
Saginaw MSA	285	37,371	2.1	2,213	6.5	6.7	5.2	12.3	10.5	9.2	52.8	47.7	54.6	28.4	35.1	31.0	0.0	0.0	0.0	
Michigan Non-MSA 17-18	1,302	113,299	9.4	32,031	0.0	0.0	0.0	12.3	10.8	10.7	63.8	61.4	62.3	23.7	27.8	26.9	0.2	0.0	0.0	
Michigan Non-MSA 19	550	41,516	4.0	15,850	0.0	0.0	0.0	12.2	9.1	10.8	63.4	64.0	62.0	24.2	26.9	27.1	0.2	0.0	0.0	
Total	13,885	1,611,142	100.0	209,409	6.4	6.0	6.0	18.7	17.7	17.4	40.1	43.4	38.9	34.0	32.3	37.1	0.8	0.6	0.6	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017 – 2019
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Detroit MSA	6,459	808,882	46.5	89,279	84.1	63.8	46.3	6.6	35.4	9.3	0.8
Limited-Scope:											
Ann Arbor MSA	309	36,350	2.2	7,475	83.3	71.8	45.5	5.9	26.9	10.8	1.3
Battle Creek MSA	54	4,597	0.4	1,219	77.5	75.9	41.7	7.3	24.1	15.2	0.0
Bay City MSA	106	4,909	0.8	1,132	79.2	75.5	53.4	6.4	24.5	14.4	0.0
Flint MI MSA	589	91,384	4.2	4,891	82.8	57.7	43.5	5.7	42.3	11.6	0.0
Grand Rapids MSA 17-18	1,855	206,273	13.4	17,611	78.8	67.2	42.1	8.9	32.6	12.4	0.2
Grand Rapids MSA 19	821	98,057	5.9	18,098	80.7	62.6	42.2	7.8	36.4	11.5	1.0
Jackson MSA	171	24,473	1.2	1,807	79.9	59.6	43.3	7.5	38.6	12.6	1.8
Kalamazoo MSA	154	24,334	1.1	3,832	80.3	54.5	43.7	7.2	44.2	12.6	1.3
Lansing MSA	596	64,659	4.3	6,789	80.6	67.1	46.1	6.0	32.2	13.4	0.7
Midland MSA	42	6,791	0.3	1,138	80.7	66.7	49.7	6.3	33.3	13.0	0.0
Monroe MSA	211	12,684	1.5	1,895	82.8	78.7	51.9	5.8	21.3	11.3	0.0
Muskegon MSA	315	29,278	2.3	1,978	80.2	69.2	44.7	7.3	30.5	12.5	0.3
Niles MSA	66	6,285	0.5	2,171	81.1	65.2	42.5	6.3	33.3	12.6	1.5
Saginaw MSA	285	37,371	2.1	2,213	76.9	61.1	49.0	7.3	38.6	15.8	0.4
Michigan Non-MSA 17-18	1,302	113,299	9.4	32,031	79.4	70.8	47.2	6.5	28.8	14.1	0.4
Michigan Non-MSA 19	550	41,516	4.0	15,850	80.8	71.6	47.2	6.0	28.0	13.2	0.4
Total	13,885	1,611,142	100.0	209,409	82.5	65.5	45.8	6.6	33.9	10.9	0.6
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2017 – 2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Detroit MSA	62	3,988	21.0	294	4.9	1.6	0.7	18.9	11.3	18.4	43.5	41.9	52.7	32.5	45.2	27.6	0.3	0.0	0.7	
Limited-Scope:																				
Ann Arbor MSA	6	131	2.0	72	3.4	0.0	1.4	5.9	0.0	1.4	57.3	66.7	55.6	33.2	33.3	41.7	0.1	0.0	0.0	
Battle Creek MSA	0	0	0.0	46	1.9	0.0	0.0	7.3	0.0	0.0	63.0	0.0	82.6	27.7	0.0	17.4	0.0	0.0	0.0	
Bay City MSA	8	170	2.7	52	0.6	0.0	1.9	6.1	0.0	0.0	63.9	100.0	76.9	29.4	0.0	21.2	0.0	0.0	0.0	
Flint MI MSA	17	839	5.8	61	3.4	0.0	0.0	7.1	11.8	1.6	39.0	35.3	39.3	50.4	52.9	59.0	0.0	0.0	0.0	
Grand Rapids MSA 17-18	54	2,915	18.3	369	0.8	0.0	0.5	16.2	18.5	15.2	55.0	50.0	60.7	27.9	31.5	23.6	0.0	0.0	0.0	
Grand Rapids MSA 19	18	923	6.1	432	0.7	0.0	0.5	15.1	22.2	13.0	55.7	16.7	63.9	28.5	61.1	22.7	0.0	0.0	0.0	
Jackson MSA	3	452	1.0	38	1.5	0.0	0.0	10.9	0.0	7.9	62.6	0.0	73.7	25.0	100.0	18.4	0.0	0.0	0.0	
Kalamazoo MSA	5	89	1.7	50	3.5	0.0	0.0	12.5	0.0	12.0	55.1	80.0	54.0	28.4	20.0	34.0	0.4	0.0	0.0	
Lansing MSA	16	542	5.4	256	1.5	0.0	0.8	7.4	0.0	2.0	63.7	81.3	78.5	26.8	18.8	18.8	0.6	0.0	0.0	
Midland MSA	0	0	0.0	44	0.4	0.0	0.0	17.9	0.0	9.1	59.8	0.0	79.5	22.0	0.0	11.4	0.0	0.0	0.0	
Monroe MSA	4	95	1.4	130	0.0	0.0	0.0	4.3	0.0	0.8	82.9	75.0	83.8	12.8	25.0	15.4	0.0	0.0	0.0	
Muskegon MSA	3	35	1.0	34	5.4	0.0	0.0	8.4	0.0	0.0	53.0	66.7	67.6	33.1	33.3	32.4	0.0	0.0	0.0	
Niles MSA	1	20	0.3	100	1.8	0.0	0.0	7.1	0.0	1.0	67.3	100.0	71.0	23.8	100.0	28.0	0.0	0.0	0.0	
Saginaw MSA	7	182	2.4	116	1.3	0.0	0.0	3.0	0.0	0.0	59.7	57.1	58.6	36.0	42.9	41.4	0.0	0.0	0.0	
Michigan Non-MSA 17-18	72	3,032	24.4	950	0.0	0.0	0.0	4.3	4.2	2.4	74.1	76.4	80.8	21.6	19.4	16.7	0.0	0.0	0.0	
Michigan Non-MSA 19	19	1,261	6.4	887	0.0	0.0	0.0	4.8	0.0	2.6	73.3	63.2	80.7	21.9	36.8	16.7	0.0	0.0	0.0	
Total	295	14,674	100.0	3,931	2.4	0.3	0.3	11.5	8.8	5.8	57.2	56.8	71.1	28.7	34.1	22.7	0.1	0.0	0.1	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017 – 2019
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Detroit MSA	62	3,988	21.0	294	95.5	75.8	44.6	2.7	24.2	1.7	0.0
Limited-Scope:											
Ann Arbor MSA	6	131	2.0	72	95.3	66.7	47.2	2.6	33.3	2.1	0.0
Battle Creek MSA	0	0	0.0	46	95.4	0.0	28.3	3.0	0.0	1.6	0.0
Bay City MSA	8	170	2.7	52	98.2	100.0	51.9	0.9	0.0	0.9	0.0
Flint MI MSA	17	839	5.8	61	95.6	70.6	44.3	2.9	29.4	1.5	0.0
Grand Rapids MSA 17-18	54	2,915	18.3	369	92.3	83.3	38.5	5.7	16.7	1.9	0.0
Grand Rapids MSA 19	18	923	6.1	432	93.6	100.0	35.4	4.9	0.0	1.6	0.0
Jackson MSA	3	452	1.0	38	98.5	100.0	31.6	1.0	0.0	0.5	0.0
Kalamazoo MSA	5	89	1.7	50	91.9	80.0	38.0	5.7	20.0	2.5	0.0
Lansing MSA	16	542	5.4	256	96.4	75.0	26.2	2.2	25.0	1.5	0.0
Midland MSA	0	0	0.0	44	98.0	0.0	68.2	2.0	0.0	0.0	0.0
Monroe MSA	4	95	1.4	130	96.8	75.0	60.8	2.4	25.0	0.8	0.0
Muskegon MSA	3	35	1.0	34	96.3	100.0	47.1	3.4	0.0	0.3	0.0
Niles MSA	2	35	0.3	100	95.7	50.0	32.0	3.7	50.0	0.5	0.0
Saginaw MSA	7	182	2.4	116	97.0	71.4	55.2	1.5	28.6	1.5	0.0
Michigan Non-MSA 17-18	72	3,032	24.4	950	95.8	80.6	44.7	2.6	18.1	1.7	1.4
Michigan Non-MSA 19	19	1,261	6.4	887	96.1	57.9	46.7	2.4	42.1	1.5	0.0
Total	295	14,674	100.0	3,931	95.6	79.1	42.7	2.9	20.6	1.5	0.3
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017 – 2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Akron MSA	8,984	1,050,883	11.3	23,687	5.7	4.3	3.1	17.7	17.0	14.5	44.9	47.2	45.2	31.7	31.5	37.2	0.0	0.0	0.0	
Cleveland MSA	18,066	2,374,345	22.7	64,885	6.5	3.3	3.0	16.2	12.0	12.4	37.9	38.8	39.3	39.2	45.8	45.3	0.2	0.1	0.0	
Columbus MSA	21,532	3,970,417	27.0	71,782	5.1	4.2	4.4	17.8	14.5	16.5	36.5	30.5	34.8	40.6	50.7	44.3	0.0	0.1	0.0	
Limited-Scope:																				
Canton MSA	6,066	698,658	7.6	12,136	3.4	1.3	1.1	8.2	5.3	5.0	69.8	71.1	70.7	18.6	22.3	23.1	0.0	0.0	0.0	
Dayton MSA	2,911	413,026	3.7	23,451	5.7	2.7	3.0	16.3	10.5	13.6	45.6	47.6	46.5	32.4	39.2	36.9	0.0	0.0	0.0	
Lima MSA	443	44,497	0.6	2,604	2.7	2.0	1.9	12.8	11.7	8.6	52.7	49.7	51.9	31.9	36.6	37.6	0.0	0.0	0.0	
Mansfield MSA	732	68,013	0.9	2,981	2.2	1.4	0.7	13.6	10.4	9.1	57.9	61.1	59.7	26.3	27.2	30.5	0.0	0.0	0.0	
Springfield MSA	626	59,867	0.8	3,596	3.1	1.6	1.1	20.2	17.7	20.2	46.6	46.3	47.0	30.1	34.3	31.7	0.0	0.0	0.0	
Toledo MSA	6,596	742,672	8.3	15,300	6.8	2.9	2.3	12.0	8.6	8.6	45.0	44.2	44.6	36.2	44.3	44.6	0.0	0.0	0.0	
Ohio Non-MSA	13,716	1,420,660	17.2	37,132	0.5	0.3	0.3	12.1	12.6	12.8	65.5	63.7	63.2	21.8	23.5	23.7	0.0	0.0	0.0	
Total	79,672	10,843,037	100.0	257,554	4.6	2.9	2.8	15.1	12.5	13.3	47.3	45.3	45.0	33.0	39.2	38.9	0.0	0.0	0.0	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017 – 2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Full-Scope:																					
Akron MSA	8,984	1,050,883	11.3	23,687	21.4	15.5	11.4	16.9	24.7	20.8	20.8	23.8	21.6	40.9	35.6	34.0	0.0	0.5	12.3		
Cleveland MSA	18,066	2,374,345	22.7	64,885	22.8	11.4	8.8	16.7	22.9	19.3	19.3	24.5	21.4	41.2	40.7	37.2	0.0	0.5	13.4		
Columbus MSA	21,532	3,970,417	27.0	71,782	21.8	7.6	7.6	16.8	18.1	18.3	19.4	22.0	20.9	41.9	51.4	38.5	0.0	1.0	14.7		
Limited-Scope:																					
Canton MSA	6,066	698,658	7.6	12,136	19.6	11.7	9.8	18.7	23.7	21.7	21.9	25.4	23.1	39.8	38.6	33.5	0.0	0.6	11.8		
Dayton MSA	2,911	413,026	3.7	23,451	22.6	9.9	8.1	17.0	23.1	19.5	19.6	24.0	22.0	40.9	42.3	39.1	0.0	0.7	11.4		
Lima MSA	443	44,497	0.9	2,604	21.7	10.4	9.8	17.0	23.5	22.5	21.6	23.5	25.0	39.7	41.8	32.1	0.0	0.9	10.5		
Mansfield MSA	732	68,013	1.6	2,981	20.6	9.8	9.4	18.5	22.7	20.6	20.9	26.8	25.4	40.0	40.4	31.0	0.0	0.3	13.8		
Springfield MSA	626	59,867	4.5	3,596	20.9	12.9	11.4	17.4	24.9	24.5	20.9	27.0	23.3	40.8	34.8	26.5	0.0	0.3	14.3		
Toledo MSA	6,596	742,672	8.3	15,300	23.2	10.5	9.5	16.4	22.9	20.5	19.7	25.8	23.0	40.7	40.3	35.5	0.0	0.5	11.5		
Ohio Non-MSA	13,716	1,420,660	17.2	37,132	19.4	9.6	8.0	18.1	24.3	22.6	21.9	26.8	23.5	40.5	38.8	33.5	0.0	0.5	12.4		
Total	79,672	10,843,037	100.0	257,554	21.6	10.4	8.6	17.2	22.1	19.9	20.2	24.3	21.9	41.0	42.5	36.4	0.0	0.6	13.1		
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2017 – 2019		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Akron MSA	3,029	309,905	12.0	12,401	10.2	8.2	9.0	15.0	15.1	14.3	37.2	38.5	36.9	37.5	38.3	39.9	0.0	0.0	0.0	
Cleveland MSA	7,727	763,520	30.7	39,140	8.2	6.2	7.1	16.2	13.1	15.0	33.0	35.2	31.7	41.9	44.9	45.4	0.8	0.6	0.8	
Columbus MSA	6,023	662,636	23.9	35,791	9.2	7.8	13.4	17.5	13.8	14.6	30.3	28.8	27.1	42.4	49.0	44.6	0.5	0.6	0.3	
Limited-Scope:																				
Canton MSA	1,532	128,196	6.1	5,940	5.1	3.6	4.4	6.9	5.7	6.0	66.4	70.2	64.7	19.4	19.2	23.5	2.3	1.4	1.5	
Dayton MSA	1,304	144,145	5.2	11,437	7.2	11.8	7.0	17.3	16.0	17.1	43.2	40.6	42.6	32.3	31.6	33.2	0.0	0.0	0.0	
Lima MSA	133	11,204	0.5	1,163	4.8	1.5	4.3	19.2	16.5	18.0	44.3	48.1	45.3	31.7	33.8	32.4	0.0	0.0	0.0	
Mansfield MSA	205	15,895	0.8	1,619	9.0	11.7	9.0	15.0	17.6	15.3	48.4	54.1	49.6	27.6	16.6	26.1	0.0	0.0	0.0	
Springfield MSA	245	27,027	1.0	1,553	5.0	3.3	4.4	27.2	27.8	27.5	38.0	36.7	36.1	29.9	32.2	32.1	0.0	0.0	0.0	
Toledo MSA	1,523	163,739	6.0	7,642	12.4	8.5	10.1	10.2	12.6	9.7	38.8	37.6	36.7	38.6	41.3	43.5	0.1	0.0	0.0	
Ohio Non-MSA	3,470	287,830	13.8	18,830	0.8	0.4	0.6	16.5	15.3	15.1	62.3	62.0	62.5	20.5	22.2	21.8	0.0	0.1	0.0	
Total	25,191	2,514,097	100.0	135,516	7.5	6.3	8.0	15.9	13.7	14.5	40.3	40.5	38.3	35.8	39.1	38.8	0.5	0.4	0.4	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017 – 2019
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Akron MSA	3,029	309,905	12.0	12,401	82.4	65.9	44.5	6.6	33.2	11.0	0.9
Cleveland MSA	7,727	763,520	30.7	39,140	83.4	67.7	47.6	6.6	31.9	10.0	0.4
Columbus MSA	6,023	662,636	23.9	35,791	83.9	63.0	42.5	5.3	36.4	10.8	0.6
Limited-Scope:											
Canton MSA	1,532	128,196	6.1	5,940	82.0	68.0	45.0	6.2	31.3	11.8	0.7
Dayton MSA	1,304	144,145	5.2	11,437	81.4	63.9	45.9	6.2	35.4	12.4	0.8
Lima MSA	133	11,204	0.5	1,163	76.8	62.4	34.7	7.0	37.6	16.3	0.0
Mansfield MSA	205	15,895	0.8	1,619	79.0	64.9	47.2	6.0	34.1	15.0	1.0
Springfield MSA	245	27,027	1.0	1,553	79.1	58.4	47.3	6.3	41.2	14.6	0.4
Toledo MSA	1,523	163,739	6.0	7,642	79.5	64.9	46.3	7.2	34.3	13.2	0.8
Ohio Non-MSA	3,470	287,830	13.8	18,830	79.3	69.7	47.5	6.2	29.8	14.6	0.5
Total	25,191	2,514,097	100.0	135,516	82.1	66.1	45.5	6.2	33.3	11.7	0.6
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2017 – 2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Akron MSA	31	1,889	5.1	92	4.4	0.0	6.5	10.2	3.2	3.3	52.4	41.9	58.7	33.0	54.8	31.5	0.0	0.0	0.0
Cleveland MSA	86	6,528	14.1	208	3.7	1.2	1.0	11.6	7.0	6.3	40.1	44.2	49.5	44.5	47.7	43.3	0.1	0.0	0.0
Columbus MSA	144	13,506	23.6	456	4.5	1.4	1.1	14.5	6.9	12.3	44.1	51.4	54.4	36.8	40.3	31.8	0.1	0.0	0.4
Limited-Scope:																			
Canton MSA	34	1,870	5.6	139	1.5	0.0	0.0	2.4	0.0	0.7	80.8	97.1	88.5	15.1	2.9	10.8	0.2	0.0	0.0
Dayton MSA	29	3,093	4.7	205	3.2	3.4	0.5	12.4	10.3	6.8	53.5	37.9	54.1	30.9	48.3	38.5	0.0	0.0	0.0
Lima MSA	13	1,098	2.1	128	0.6	0.0	0.0	5.2	0.0	0.8	75.8	69.2	87.5	18.4	30.8	11.7	0.0	0.0	0.0
Mansfield MSA	2	83	0.3	73	1.1	0.0	2.7	4.8	0.0	0.0	65.8	100.0	78.1	28.2	0.0	19.2	0.0	0.0	0.0
Springfield MSA	16	1,727	2.6	100	3.5	0.0	0.0	17.2	6.3	3.0	44.1	50.0	68.0	35.2	43.8	29.0	0.0	0.0	0.0
Toledo MSA	47	3,162	7.7	405	3.7	6.4	0.2	5.9	6.4	1.5	50.4	59.6	73.3	40.0	27.7	24.9	0.0	0.0	0.0
Ohio Non-MSA	209	17,976	34.2	1,947	0.2	0.5	0.2	6.2	5.7	3.6	63.7	76.1	69.4	29.8	17.7	26.8	0.0	0.0	0.0
Total	611	50,932	100.0	3,753	2.5	1.3	0.5	9.5	5.9	4.5	54.0	61.4	67.3	33.9	31.4	27.7	0.1	0.0	0.1
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-19
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Akron MSA	31	1,889	5.1	92	95.9	90.3	73.9	2.4	9.7	1.7	0.0
Cleveland MSA	86	6,528	14.1	208	95.8	89.5	63.5	2.6	10.5	1.6	0.0
Columbus MSA	144	13,506	23.6	456	95.6	74.3	46.7	2.7	25.7	1.6	0.0
Limited-Scope:											
Canton MSA	34	1,870	5.6	139	96.8	88.2	69.1	2.0	11.8	1.2	0.0
Dayton MSA	29	3,093	4.7	205	95.9	72.4	57.6	2.6	27.6	1.5	0.0
Lima MSA	13	1,098	2.1	128	97.9	69.2	62.5	1.5	30.8	0.6	0.0
Mansfield MSA	2	83	0.3	73	97.5	100.0	54.8	1.7	0.0	0.8	0.0
Springfield MSA	16	1,727	2.6	100	97.3	87.5	57.0	1.9	12.5	0.8	0.0
Toledo MSA	47	3,162	7.7	405	95.4	100.0	77.0	3.2	0.0	1.4	0.0
Ohio Non-MSA	209	17,976	34.2	1,947	97.7	84.2	61.1	1.3	15.3	0.9	0.5
Total	611	50,932	100.0	3,753	96.5	83.6	61.4	2.2	16.2	1.3	0.2
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017 – 2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope:																					
Pittsburgh MSA	5,313	830,728	83.8	66,931	2.8	2.0	1.5	14.3	16.8	11.5	51.9	51.5	49.0	31.1	29.7	38.0	0.0	0.0	0.0		
Limited-Scope																					
Erie MSA	257	28,720	4.1	5,953	4.5	2.7	2.3	8.8	15.6	8.5	50.6	46.3	47.2	36.2	35.4	42.1	0.0	0.0	0.0		
Pennsylvania Non-MSA	769	69,355	12.1	2,190	3.1	1.4	1.7	7.7	5.9	5.6	75.8	72.3	74.8	13.4	20.4	17.9	0.0	0.0	0.0		
Total	6,339	928,803	100.0	75,074	2.9	1.9	1.5	13.5	15.4	11.1	52.7	53.8	49.6	30.9	28.8	37.8	0.0	0.0	0.0		
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017 – 2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Full-Scope:																					
Pittsburgh MSA	5,313	830,728	83.8	66,931	20.3	14.3	9.2	17.1	24.2	19.5	20.5	21.8	21.6	42.1	39.3	39.4	0.0	0.4	10.4		
Limited-Scope																					
Erie MSA	257	28,720	4.1	5,953	21.1	10.1	9.0	17.6	27.6	19.7	20.8	28.4	25.1	40.5	33.9	36.8	0.0	0.0	9.4		
Pennsylvania Non-MSA	769	69,355	12.1	2,190	20.8	13.5	9.7	16.9	23.3	21.8	21.5	22.2	22.1	40.9	41.0	37.0	0.0	0.0	9.5		
Total	6,339	928,803	100.0	75,074	20.4	14.0	9.2	17.1	24.3	19.6	20.5	22.1	21.9	41.9	39.3	39.1	0.0	0.3	10.3		
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2017 – 2019		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Pittsburgh MSA	2,201	203,500	86.1	40,804	4.8	3.5	4.1	13.5	12.5	13.7	42.7	50.0	43.7	38.1	33.8	38.0	0.8	0.2	0.5	
Limited-Scope																				
Erie MSA	120	9,374	4.7	3,671	12.4	9.2	12.0	11.8	12.5	11.2	45.0	50.8	46.7	30.8	27.5	30.1	0.0	0.0	0.0	
Pennsylvania Non-MSA	236	20,642	9.2	1,279	11.2	11.9	9.3	5.9	1.7	5.6	62.4	72.9	67.0	20.5	13.6	18.1	0.0	0.0	0.0	
Total	2,557	233,516	100.0	45,754	5.6	4.5	4.9	13.2	11.5	13.3	43.5	52.1	44.6	37.0	31.6	36.8	0.8	0.2	0.4	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017 – 2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Full-Scope:												
Pittsburgh MSA	2,201	203,500	86.1	40,804	82.8	68.7	46.2	5.9	30.6	11.2	0.8	
Limited-Scope												
Erie MSA	120	9,374	4.7	3,671	79.9	65.8	41.8	7.2	31.7	12.9	2.5	
Pennsylvania Non-MSA	236	20,642	9.2	1,279	80.7	68.2	42.7	6.7	31.8	12.6	0.0	
Total	2,557	233,516	100.0	45,754	82.5	68.5	45.8	6.1	30.7	11.4	0.8	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, “--” data not available. Due to rounding, totals may not equal 100.0%												

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2017 – 2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Pittsburgh MSA	16	957	88.9	166	2.1	0.0	1.2	10.6	6.3	6.6	57.6	31.3	77.1	29.6	62.5	15.1	0.1	0.0	0.0	
Limited-Scope																				
Erie MSA	0	0	0.0	34	2.9	0.0	0.0	6.3	0.0	5.9	46.1	0.0	47.1	44.7	0.0	47.1	0.0	0.0	0.0	
Pennsylvania Non-MSA	2	54	11.1	25	0.5	0.0	0.0	2.3	0.0	0.0	86.7	100.0	96.0	10.6	0.0	4.0	0.0	0.0	0.0	
Total	18	1,011	100.0	225	2.1	0.0	0.9	9.7	5.6	5.8	57.8	38.9	74.7	30.3	55.6	18.7	0.1	0.0	0.0	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017 – 2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Full-Scope:												
Pittsburgh MSA	16	957	88.9	166	96.2	68.8	41.6	2.2	31.3	1.6	0.0	
Limited-Scope												
Erie MSA	0	0	0	34	95.4	0.0	32.4	3.3	0.0	1.3	0.0	
Pennsylvania Non-MSA	2	54	11.1	25	99.5	100.0	44.0	0.0	0.0	0.5	0.0	
Total	18	1,011	100.0	225	96.3	72.2	40.4	2.2	27.8	1.5	0.0	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%												

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017 – 2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope:																					
Morgantown MSA	867	163,935	24.9	2,550	0.0	0.1	0.2	15.3	15.7	12.4	43.2	41.1	40.1	41.4	43.1	47.4	0.0	0.0	0.0		
Limited-Scope:																					
Charleston MSA	577	72,587	16.6	3,594	1.2	0.5	1.1	11.3	14.4	13.8	52.9	49.9	49.2	34.7	35.2	35.8	0.0	0.0	0.0		
Huntington MSA	560	75,400	16.1	3,984	3.2	1.6	2.2	13.2	7.3	6.8	49.4	48.0	46.6	34.1	42.9	44.0	0.0	0.2	0.5		
Parkersburg MSA	303	35,316	8.7	1,686	0.0	0.0	0.0	8.5	6.3	6.1	67.4	70.6	65.7	24.2	23.1	28.2	0.0	0.0	0.0		
West Virginia Non-MSA	1,175	139,274	33.7	3,123	0.2	0.3	0.3	5.8	7.4	7.4	58.6	50.7	42.5	35.4	41.6	49.8	0.0	0.0	0.0		
Total	3,482	486,512	100.0	14,937	1.2	0.5	1.0	10.5	10.5	9.5	54.2	49.5	47.4	34.1	39.5	42.0	0.0	0.0	0.1		
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2017 – 2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Morgantown MSA	867	163,935	24.9	2,550	20.9	5.7	5.5	14.4	20.1	16.9	20.4	21.5	20.1	44.2	52.0	48.7	0.0	0.8	8.7	
Limited-Scope:																				
Charleston MSA	577	72,587	16.6	3,594	20.7	9.5	7.8	17.1	18.7	17.8	19.8	24.6	22.0	42.4	46.4	40.9	0.0	0.7	11.6	
Huntington MSA	560	75,400	16.1	3,984	21.8	6.4	5.8	16.5	18.9	15.0	19.7	25.0	23.2	42.1	48.6	44.7	0.0	1.1	11.2	
Parkersburg MSA	303	35,316	8.7	1,686	20.5	11.2	7.7	17.1	18.2	16.0	20.3	24.4	23.8	42.1	45.2	43.7	0.0	1.0	8.8	
West Virginia Non-MSA	1,175	139,274	33.7	3,123	18.7	6.4	4.5	16.0	15.6	12.8	19.5	25.5	23.0	45.8	52.0	49.6	0.0	0.5	10.2	
Total	3,482	486,512	100.0	14,937	20.5	7.2	6.2	16.4	18.0	15.6	19.8	24.2	22.4	43.3	49.9	45.4	0.0	0.7	10.4	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017 – 2019**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Morgantown MSA	133	13,587	11.1	1,753	0.3	0.0	0.2	21.7	21.1	19.7	37.5	36.1	37.9	40.5	42.9	42.2	0.0	0.0	0.0
Limited-Scope:																			
Charleston MSA	341	40,426	28.4	2,974	4.2	10.0	4.2	10.4	10.9	11.1	55.7	58.4	54.8	29.7	20.8	29.9	0.0	0.0	0.0
Huntington MSA	274	25,550	22.8	2,231	13.3	15.7	14.1	10.1	5.8	6.8	40.8	43.8	41.7	34.9	34.7	37.1	0.8	0.0	0.3
Parkersburg MSA	101	9,481	8.4	1,166	0.0	0.0	0.0	11.0	8.9	9.4	70.7	80.2	72.0	18.3	10.9	18.5	0.0	0.0	0.0
West Virginia Non-MSA	351	38,255	29.3	2,325	2.2	0.0	1.7	6.9	11.1	8.3	52.7	46.7	44.6	38.2	42.2	45.3	0.0	0.0	0.0
Total	1,200	127,299	100.0	10,449	4.8	6.4	4.6	11.4	10.8	10.8	50.3	51.0	48.8	33.3	31.8	35.6	0.2	0.0	0.1

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017 – 2019**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Morgantown MSA	133	13,587	11.1	1,753	81.8	67.7	44.7	4.9	31.6	13.3	0.8
Limited-Scope:											
Charleston MSA	341	40,426	28.4	2,974	75.4	53.7	45.0	6.8	44.9	17.8	1.5
Huntington MSA	274	25,550	22.8	2,231	77.8	60.9	44.2	6.5	36.9	15.7	2.2
Parkersburg MSA	101	9,481	8.4	1,166	78.6	50.5	38.3	5.7	49.5	15.7	0.0
West Virginia Non-MSA	351	38,255	29.3	2,325	77.8	62.7	37.8	6.4	37.3	15.9	0.0
Total	1,200	127,299	100.0	10,449	77.8	59.3	42.4	6.2	39.8	16.0	1.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017 – 2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Morgantown MSA	2	26	15.4	10	0.0	0.0	0.0	9.6	50.0	10.0	46.3	50.0	70.0	44.1	0.0	20.0	0.0	0.0	0.0		
Limited-Scope:																					
Charleston MSA	5	302	38.5	3	2.2	0.0	0.0	10.4	0.0	0.0	61.2	100.0	66.7	26.2	0.0	33.3	0.0	0.0	0.0		
Huntington MSA	1	45	7.7	10	4.9	0.0	0.0	8.1	100.0	20.0	48.8	0.0	30.0	38.2	0.0	50.0	0.0	0.0	0.0		
Parkersburg MSA	0	0	0	8	0.0	0.0	0.0	1.9	0.0	0.0	83.7	0.0	100.0	14.4	0.0	0.0	0.0	0.0	0.0		
West Virginia Non-MSA	5	279	38.5	34	0.0	0.0	0.0	3.3	0.0	2.9	63.3	60.0	70.6	33.3	40.0	26.5	0.0	0.0	0.0		
Total	13	652	100.0	65	1.8	0.0	0.0	6.6	15.4	6.2	58.6	69.2	67.7	32.9	15.4	26.2	0.0	0.0	0.0		
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																					

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017 – 2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Full-Scope:												
Morgantown MSA	2	26	15.4	10	97.8	100.0	40.0	0.7	0.0	1.5	0.0	
Limited-Scope:												
Charleston MSA	5	302	38.5	3	94.0	60.0	100.0	3.3	40.0	2.7	0.0	
Huntington MSA	1	45	7.7	10	95.4	0.0	40.0	1.8	100.0	2.8	0.0	
Parkersburg MSA	0	0	0	8	98.1	0.0	25.0	1.0	0.0	1.0	0.0	
West Virginia Non-MSA	5	279	38.5	34	98.0	80.0	35.3	0.3	20.0	1.7	0.0	
Total	13	652	100.0	65	96.5	69.2	38.5	1.4	30.8	2.1	0.0	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%												

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2018
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Wisconsin Non-MSA	421	58,890	38.7	21,719	0.0	0.0	0.0	8.0	7.8	7.8	73.9	77.9	74.6	18.1	14.3	17.6	0.0	0.0	0.0
Limited-Scope																			
Appleton MSA	99	15,791	9.1	8,609	0.0	0.0	0.0	9.2	8.1	8.8	81.4	86.9	81.3	9.4	5.1	9.9	0.0	0.0	0.0
Duluth MSA	15	1,503	1.4	1,230	5.8	20.0	5.9	10.8	20.0	10.9	65.0	46.7	63.2	18.4	13.3	20.0	0.0	0.0	0.0
Green Bay MSA	200	22,419	18.4	10,763	0.9	1.0	1.2	19.8	17.0	19.2	54.7	59.5	50.8	24.6	22.5	28.7	0.0	0.0	0.0
Madison MSA	101	25,850	9.3	22,665	0.8	3.0	0.9	12.2	25.7	10.8	56.8	45.5	55.9	30.2	25.7	32.3	0.0	0.0	0.1
Milwaukee MSA	195	41,650	17.9	38,797	8.9	6.2	5.1	14.5	15.4	13.6	32.0	33.3	32.8	44.5	45.1	48.5	0.0	0.0	0.0
Oshkosh MSA	56	8,286	5.2	5,402	0.0	0.0	0.0	9.9	17.9	11.5	62.5	66.1	60.0	27.6	16.1	28.6	0.0	0.0	0.0
Total	1,087	174,389	100.0	109,185	3.5	1.8	2.2	12.5	13.2	11.9	53.9	63.3	53.2	30.1	21.6	32.7	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2017-2018		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Wisconsin Non-MSA	421	58,890	38.7	21,719	16.7	11.6	7.9	19.1	25.9	19.5	22.8	22.6	21.7	41.4	38.2	39.9	0.0	1.7	11.0	
Limited-Scope																				
Appleton MSA	99	15,791	9.1	8,609	18.2	14.1	9.3	18.6	34.3	23.2	24.9	22.2	24.5	38.3	24.2	32.3	0.0	5.1	10.7	
Duluth MSA	15	1,503	1.4	1,230	22.5	13.3	9.2	18.8	26.7	21.5	22.6	33.3	22.0	36.1	20.0	30.6	0.0	6.7	16.7	
Green Bay MSA	200	22,419	18.4	10,763	19.8	16.5	10.3	18.4	30.5	21.4	22.0	22.0	22.8	39.8	28.0	33.6	0.0	3.0	12.0	
Madison MSA	101	25,850	9.3	22,665	19.4	8.9	7.1	17.1	28.7	18.7	22.9	21.8	26.5	40.6	36.6	40.8	0.0	4.0	6.9	
Milwaukee MSA	195	41,650	17.9	38,797	25.7	3.1	8.0	16.3	20.5	18.4	19.0	22.1	22.2	39.0	49.7	39.8	0.0	4.6	11.6	
Oshkosh MSA	56	8,286	5.2	5,402	18.6	23.2	9.4	18.4	21.4	22.9	24.0	16.1	22.9	39.0	37.5	32.5	0.0	1.8	12.4	
Total	1,087	174,389	100.0	109,185	21.3	11.6	8.2	17.5	26.6	19.6	21.4	22.1	23.3	39.8	36.7	38.4	0.0	3.0	10.6	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2018		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Wisconsin Non-MSA	274	20,918	31.3	9,789	0.0	0.0	0.0	9.7	8.0	9.3	75.4	74.8	73.7	14.7	17.2	17.0	0.2	0.0	0.1		
Limited-Scope																					
Appleton MSA	104	10,184	11.9	3,372	0.0	0.0	0.0	10.6	5.8	10.1	82.1	82.7	80.0	7.3	11.5	9.9	0.0	0.0	0.0		
Duluth MSA	15	407	1.7	417	28.8	53.3	30.7	8.6	6.7	9.4	51.0	26.7	48.9	11.5	13.3	11.0	0.0	0.0	0.0		
Green Bay MSA	241	20,515	27.5	5,230	2.8	2.9	2.7	25.0	24.1	24.9	50.2	45.6	47.0	22.0	27.4	25.4	0.0	0.0	0.0		
Madison MSA	85	7,929	9.7	8,673	2.4	2.4	1.5	16.0	18.8	14.4	48.0	50.6	48.4	31.6	28.2	34.0	2.0	0.0	1.6		
Milwaukee MSA	113	14,606	12.9	24,143	13.0	12.4	9.7	14.0	4.4	11.9	31.8	23.9	31.3	41.2	59.3	47.1	0.1	0.0	0.0		
Oshkosh MSA	44	3,599	5.0	2,057	0.0	0.0	0.0	18.0	6.8	17.5	57.0	65.9	54.5	25.0	27.3	28.0	0.0	0.0	0.0		
Total	876	78,158	100.0	53,681	6.1	3.5	5.1	14.4	12.7	13.2	50.0	57.5	47.4	29.0	26.3	34.0	0.5	0.0	0.3		
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Wisconsin Non-MSA	274	20,918	31.3	9,789	79.7	69.7	50.6	6.8	28.5	13.4	1.8
Limited-Scope											
Appleton MSA	104	10,184	11.9	3,372	74.8	79.8	46.2	8.8	18.3	16.4	1.9
Duluth MSA	15	407	1.7	417	74.7	80.0	48.0	8.5	20.0	16.8	0.0
Green Bay MSA	241	20,515	27.5	5,230	77.8	60.2	46.7	8.5	39.8	13.7	0.0
Madison MSA	85	7,929	9.7	8,673	81.1	74.1	48.5	6.9	25.9	12.0	0.0
Milwaukee MSA	113	14,606	12.9	24,143	78.6	58.4	44.0	9.3	38.1	12.1	3.5
Oshkosh MSA	44	3,599	5.0	2,057	76.5	54.5	44.8	8.0	43.2	15.5	2.3
Total	876	78,158	100.0	53,681	78.9	66.7	46.4	8.1	32.0	13.0	1.4
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2017-2018	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle- Income Tracts			Upper- Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Wisconsin Non-MSA	13	453	33.3	945	0.0	0.0	0.0	2.8	7.7	1.6	79.1	53.8	83.9	18.1	38.5	14.5	0.0	0.0	0.0
Limited-Scope																			
Appleton MSA	2	77	10.5	160	0.0	0.0	0.0	7.5	100.0	5.0	85.7	0.0	91.3	6.8	0.0	3.8	0.0	0.0	0.0
Duluth MSA	0	0	0.0	9	5.2	0.0	0.0	6.9	0.0	0.0	87.9	0.0	88.9	0.0	0.0	11.1	0.0	0.0	0.0
Green Bay MSA	12	1,282	30.8	212	0.5	0.0	0.0	14.1	0.0	9.4	58.0	50.0	67.0	27.4	50.0	23.6	0.0	0.0	0.0
Madison MSA	5	579	12.8	381	0.4	0.0	0.5	12.1	0.0	21.5	57.8	0.0	60.9	29.4	100.0	17.1	0.3	0.0	0.0
Milwaukee MSA	0	0	0.0	67	8.6	0.0	4.5	10.4	0.0	3.0	29.3	0.0	17.9	51.7	0.0	74.6	0.0	0.0	0.0
Oshkosh MSA	7	965	17.9	53	0.0	0.0	0.0	6.7	0.0	0.0	69.4	57.1	60.4	23.8	42.9	39.6	0.0	0.0	0.0
Total	39	3,356	100.0	1,827	1.4	0.0	0.3	7.9	7.7	7.0	64.8	43.6	74.7	25.8	48.7	18.1	0.1	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Wisconsin Non-MSA	13	453	33.3	945	95.2	84.6	47.2	3.5	15.4	1.3	0.0
Limited-Scope											
Appleton MSA	2	77	5.1	160	94.8	100.0	36.3	3.2	0.0	2.0	0.0
Duluth MSA	--	--	--	9	96.6	--	77.8	1.7	--	1.7	--
Green Bay MSA	12	1,282	30.8	212	93.9	41.7	40.1	4.5	58.3	1.6	0.0
Madison MSA	5	579	12.8	381	95.7	20.0	55.4	2.5	80.0	1.8	0.0
Milwaukee MSA	--	--	--	67	91.7	--	65.7	5.3	--	2.9	--
Oshkosh MSA	7	965	17.9	53	96.6	100.0	30.2	2.3	0.0	1.0	0.0
Total	39	3,356	100.0	1,827	94.7	66.7	47.5	3.5	33.3	1.7	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											