



## **PUBLIC DISCLOSURE**

August 14, 2023

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The First National Bank of Dennison  
Charter Number 13802

105 Grant Street  
Dennison, OH 44621

Office of the Comptroller of the Currency

200 Public Square Suite 1610  
Cleveland, OH 44144-2301

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

**Table of Contents**

Overall CRA Rating..... 1  
Description of Institution..... 2  
Scope of the Evaluation..... 2  
Discriminatory or Other Illegal Credit Practices Review..... 4  
State Rating..... 5  
    State of Ohio..... 5  
Lending Test ..... 7  
Appendix A: Scope of Examination..... A-1  
Appendix B: Summary of MMSA and State Ratings..... B-1  
Appendix C: Definitions and Common Abbreviations..... C-1  
Appendix D: Tables of Performance Data..... D-1

## Overall CRA Rating

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

**The lending test is rated: Satisfactory**

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable given the size and financial condition, and the credit needs of its community.
- The bank originated or purchased a majority of its loans, by number and dollar amount, inside its assessment area (AA) during the evaluation period.
- The geographic distribution of home mortgage loans, loans to small businesses and consumer installment loans demonstrates a reasonable distribution of loans throughout the AA.
- The bank's distribution of home mortgage loans, loans to small businesses and consumer installment loans reflects a reasonable penetration to borrowers of different income levels and businesses of different sizes.

### Loan-to-Deposit Ratio

Considering The First National Bank of Dennison's (FNB or bank) size, financial condition, and credit needs of the AA, the bank's LTD is reasonable.

FNB's LTD ratio is calculated on a bank-wide basis. During the evaluation period, the bank's average quarterly LTD ratio was 58.2 percent, with quarterly ratios ranging from a high of 67.9 percent in the second quarter of 2019 to a low of 49.1 percent in the fourth quarter of 2020. Similarly situated banks had a quarterly average of 87.1 percent and ranged from 85.6 percent to 88.6 percent. From the high as of June 30, 2019, the bank's LTD ratio declined throughout 2020 and 2021 due to the COVID-19 pandemic stimulus plans with deposit growth outpacing loan growth.

Between March 31, 2020, and December 31, 2021, loans and leases increased by 4.4 percent from \$129.5 million to \$135.2 million. By contrast, total deposits during this period grew by 26.5 percent from \$206.1 million to \$260.7 million. This latter trend reasonably coincides with a surge in deposits many financial institutions experienced during and following the height of the COVID-19 pandemic, stemming from various government stimulus plans. FNB also sells a majority of its home mortgage loans to the secondary market, with over \$61.2 million purchased by investors during the evaluation period.

### Lending in Assessment Area

A majority of the bank's loans are inside the AA.

The Office of the Comptroller of the Currency (OCC) based these conclusions on a statistical sample of 60 consumer installment loans, 60 commercial loans and 55 home mortgage loans originated from January 1, 2019, to December 31, 2021. Of the 175 loans reviewed, the bank originated or purchased 78.9 percent by number and 81.8 percent by dollar amount of its total consumer, commercial and home mortgage loans within the AA during the evaluation period. This analysis is performed at the bank, rather than the AA,

level and had a positive impact on the overall analysis of the bank's distribution of lending by income level of geographies.

Lending Inside and Outside of the Assessment Area 2019-2022										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Consumer Loans	44	73.3	16	26.7	60	533	72.3	204	27.7	737
Commercial Loans	47	78.3	13	21.7	60	5,249	84.8	942	15.2	8,158
Home Mortgage Loans	47	85.5	8	14.5	55	3,791	79.3	987	20.7	4,778
<b>Total</b>	<b>138</b>	<b>78.9</b>	<b>37</b>	<b>21.1</b>	<b>175</b>	<b>9,573</b>	<b>81.8</b>	<b>2,133</b>	<b>18.2</b>	<b>11,706</b>

Source: Evaluation Period: 1/1/2019 - 12/31/2021. Bank Data. Due to rounding, totals may not equal 100.0

## Description of Institution

FNB is a \$287.6 million intrastate bank headquartered in Dennison, Ohio. It is a wholly owned subsidiary of FNB, Inc., a one-bank holding company. FNB, Inc. has one other subsidiary, Tusculum Financial Inc., which is a consumer-installment loan finance company. The bank has five full-service branches. The main office is in Dennison, with two offices in New Philadelphia, and one each in Dover and Gnadenuhnen. FNB is a traditional lender, offering home mortgage loan, small loans to businesses and consumer installment lending. During the evaluation period, FNB had one AA, which is Tuscarawas County, Ohio.

As of December 31, 2021, the bank's loan portfolio totaled \$135.2 million, 55.0 percent of which was secured by real estate. The loan portfolio consisted of 36.8 percent consumer, 23.9 percent 1-4 family residential, 16.6 percent non-farm/non-residential, 8.4 percent HELOC, 8.0 percent commercial, 2.2 percent construction, 2.1 percent farm, and 2.0 percent multi-family.

FNB's consumer deposit related products and services include checking, savings, certificates of deposit, individual retirement accounts, online and telephone banking, mobile banking, bill pay, night depository, and ATM services. Business related products and services include checking, cash management, merchant card services and wire transfers.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the communities it serves. As of December 31, 2021, tier 1 capital totaled \$26.5 million or 9.2 percent of total assets. The bank received a "Satisfactory" rating on their previous CRA performance evaluation, dated June 10, 2019.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation assesses FNB's record of meeting the credit needs of its AA. OCC examiners (examiners) performed a full-scope review using Small Bank CRA examination procedures. The lending test evaluates the bank's record of meeting the credit needs of the bank's AA through its home mortgage, commercial and consumer lending activities. The lending activity analyzed covers January 1, 2019, to December 31, 2021.

Based on the bank's internal reports for lending activity and discussions with senior management, examiners determined that the bank's primary lending focus during the evaluation period was consumer installment, commercial and home mortgage loans. Equal consideration was given to the performance related to these three products to arrive at our conclusions. The bank also originates agricultural and home equity lines; however, they are not a primary lending focus of the bank. As a result, examiners did not consider these as part of this evaluation, as an analysis of this data would not be meaningful.

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

FNB has one AA in the state of Ohio, and a full-scope review was performed for that AA. Refer to Appendix A - Scope of Examination, for more information on this AA.

### **Ratings**

FNB's overall rating is based on its state of Ohio lending performance within the Tuscarawas AA. In reaching our conclusion, examiners weighed information from the following performance criteria when analyzing the bank's primary lending product: lending within the AA, lending to borrowers of different incomes and the geographic distribution of loans. Since the AA contains no low-income and only three moderate-income census tracts (CTs), additional weight was given to lending to borrowers of different incomes and businesses of different sizes since it represents a better measure of the bank's lending performance as compared to the geographic distribution test. Refer to the "Scope" section under the State section for details regarding how the areas were weighted in arriving at the respective ratings.

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

Pursuant to 12 CFR 25.28(c), in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Ohio

**CRA rating for the State of Ohio:** Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The geographic distribution of home mortgage loans, loans to small businesses and consumer installment loans demonstrates a reasonable distribution of loans throughout the AA.
- The bank's distribution of home mortgage loans, loans to small businesses, and consumer installment loans reflects a reasonable penetration to borrowers of different income levels and businesses of different sizes.
- The bank and the agency received no complaints since the prior examination regarding FNB's performance in meeting the credit needs of the AA.

### Description of Institution's Operations in Ohio

FNB operated five branch offices within the AA. Each of the bank's branches are open Monday through Saturday and each has an onsite deposit taking automated teller machine (ATM) as well as drive-thru services. Based on 2015 American Community Survey (ACS) data, the Dover branch is in a moderate-income CT while the other four branches are in middle-income CTs. While the AA contains no low-income CTs, the branches do provide reasonable accessibility to banking services in moderate-income CTs. The bank's Dover, Dennison and both New Philadelphia branch locations are adjacent to one other moderate-income CT. The bank did not open or close any branch locations during the evaluation period. Small business lending is a focus for the bank as is the consumer retail market, which includes installment direct and indirect loans as well as home mortgage loans for sale to the secondary market.

#### Tuscarawas AA

Demographic Information of the Assessment Area						
Assessment Area: Tuscarawas AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	14.3	76.2	9.5	0.0
Population by Geography	92,697	0.0	13.2	78.9	7.9	0.0
Housing Units by Geography	40,007	0.0	14.6	77.7	7.7	0.0
Owner-Occupied Units by Geography	25,820	0.0	10.9	80.4	8.7	0.0
Occupied Rental Units by Geography	10,893	0.0	23.3	70.3	6.5	0.0
Vacant Units by Geography	3,294	0.0	15.1	81.7	3.2	0.0
Businesses by Geography	5,524	0.0	16.7	75.1	8.1	0.0
Farms by Geography	290	0.0	4.8	85.2	10.0	0.0
Family Distribution by Income Level	25,250	18.8	19.1	23.5	38.7	0.0

Household Distribution by Income Level	36,713	23.3	16.0	19.4	41.3	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$110,074
			Median Gross Rent			\$674
			Families Below Poverty Level			10.7%
<i>Source: 2015 ACS and 2020 D&amp;B data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income CTs. Based on 2015 ACS data, the AA contained 21 CTs and included no low-income CTs, three moderate-income CTs, 16 middle-income CTs, and two upper-income CTs.

The AA has a competitive banking environment, with a mixture of large and community banks and credit unions serving the area. Per the June 30, 2021, Federal Deposit Insurance Corporation Deposit Market Share Report, 13 insured financial institutions operate in the AA, maintaining 35 offices. This does not include credit unions or other financial services providers. FNB ranked third in terms of deposit market share, with 13.5 percent of the AA's insured deposits. Top competitors for deposits in the AA are Huntington Bank and First Federal Community Bank, which hold a combined 42.7 percent of the deposit market.

Significant competition for loans exists in the AA. Per the 2021 ACS peer business data, a total of 52 lenders made loans to businesses in the AA. The top five business lenders in the AA are large banks which account for 63.7 percent of the business lending in the market. FNB does not report its residential mortgage or small business loan data.

Economic conditions in the AA prior to the COVID-19 pandemic was generally consistent with the state of Ohio. According to the U.S. Bureau of Labor Statistics, the unemployment level at the beginning of 2019 for the AA was 5.7 percent, while the Ohio unemployment rate was 5.2 percent. At its pandemic peak in April 2020, the AA's unemployment rate was 14.0 percent, and was near 10.0 percent for the following three months. These rates were lower than the state unemployment during that time. The AA's unemployment rate improved throughout 2021 and matched the state's unemployment rate of 3.5 percent as of December 31, 2021. Most businesses within the AA operate with less than five employees, at a single location and have annual revenues of less than one million dollars. Services and retail trade business sectors encompass half of the employers in the AA.

Examiners considered information from two community organizations within the AA. One focuses on economic development and community improvement while the other acts as an intermediary for local businesses to match them with available funding options. There is a need for financial backing from local financial institutions for the Community Housing Impact and Preservation Program which aids in improving existing homes and providing affordable housing for low- and moderate-income people. Additionally, a need for lower interest commercial loans exists.

## Scope of Evaluation in Ohio

The analysis reflects a full-scope review of the bank's only AA. To develop our conclusions, examiners considered factors within the AA's community profile that would impact the bank's ability to lend within the AA, including aggregate lending, demographic, and market share information. FNB is not required to report home mortgage or small business lending data. Therefore, examiners based the lending-related conclusions on a statistical sample of 60 consumer installment loans, 60 business loans and 55 home mortgage loans the bank originated during the evaluation period.

Examiners utilized other supporting information while evaluating FNB's CRA performance. Additional information included the 2015 ACS census data, internal bank records, deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AA. Examiners also considered information obtained from two community organizations to help assess the needs of the bank's AAs and the opportunities for financial institutions to lend and provide services within those areas.

## LENDING TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Tuscarawas AA is reasonable.

## Distribution of Loans by Income Level of the Geography

For comparative purposes, examiners considered the percentage of owner-occupied housing units, businesses, and households in moderate-income CTs as well as aggregate peer geographic distribution data in the Tuscarawas County AA. Examiners weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from larger institutions, the lack of low- and moderate-income CTs, branch locations, area demographics, and the location of most of the owner-occupied housing.

### *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 in the AA is reasonable.

In this analysis, examiners considered that better lending opportunities exist in upper- and middle-income CTs within the AA. According to the 2015 ACS, those CTs contained 89.1 percent of owner-occupied housing units. Examiners also considered that the AA does not include any low-income CTs and while 83.8 percent of housing units in the moderate-income CTs of the AA are single-family homes, only 48.1 percent are owner-occupied, which represents just 2,354 total owner-occupied housing units.

Based on the sample, the proportion of FNB's home mortgage loans in moderate-income CTs at 8.5 percent is near to both the percentage of aggregate home mortgage lending level of 11.6 percent and the owner-occupied housing units of 10.6 percent.

### ***Small Loans to Businesses***

Refer to Table Q in *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.

FNB's geographic distribution of small loans to businesses is excellent. Based on our sample, FNB made 25.5 percent of its small loans to businesses in moderate-income CTs, which significantly exceeded both the percentage of businesses at 16.7 percent and aggregate small loans to business lending of 13.7 percent.

### ***Consumer Installment Loans***

Refer to Table U in *Appendix D* for the facts and data used to evaluate the geographic distribution of the bank's consumer installment loan originations and purchases.

FNB's distribution of consumer installment loans is reasonable. Based on the selected sample, the bank originated 9.1 percent of its consumer installment loans in moderate-income CTs, which is below the percentage of households in moderate-income CTs of 14.6 percent. The bank's level of lending in comparison to the demographic comparator is considered reasonable given that 19.5 percent of households located in moderate-income CTs have income below the poverty level, making it more difficult for these persons to qualify for credit.

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

FNB exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

### ***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.

FNB's distribution of home mortgage loans to individuals of different income levels is reasonable. In evaluating the borrower distribution, examiners considered the level of competition and its effect on limiting the bank's ability to lend to borrowers of different incomes, as well as the economic conditions in the AA. Examiners also considered the percentage of families that live below the poverty level, and barriers this creates for these families to qualify for home mortgage financing. People living below the poverty level often have difficulty qualifying for conventional home mortgage products without flexible terms or reduced closing costs. Additionally, the COVID-19 pandemic further exacerbated existing challenges for low-income borrowers.

Based on the selected sample, the proportion of the bank's home mortgage loans to low-income borrowers at 12.8 percent significantly exceeded the aggregate level of lending at 6.9 percent. Though the bank's percentage of home mortgage loans to low-income borrowers is below the 18.8 percent of low-income families in the AA, the bank's level of lending in comparison to the demographic comparator is reasonable given that 10.7 percent of the families in the AA were living below the poverty level. The proportion of

the bank's home mortgage loans to moderate-income borrowers at 19.2 percent exceeds the percentage of moderate-income families in the AA at 19.1 percent and is near to aggregate lending of 21.8 percent.

### ***Small Loans to Businesses***

Refer to Table R in *Appendix D* for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

FNB's distribution of small loans to businesses reflects reasonable penetration among businesses of different sizes. In evaluating borrower distribution, examiners considered the level of competition from other financial institutions for lending opportunities to just over 4,600 small businesses in the AA.

Based on the selected sample of small loans to businesses, FNB made 57.5 percent of its small loans to businesses with gross annual revenues of \$1 million or less. This was less than the 79.2 percent of small businesses in the AA but exceeded the aggregate percentage of 53.8 percent.

### ***Consumer Installment Loans***

Refer to Table V in *Appendix D* for the facts and data used to evaluate the borrower distribution of the bank's consumer installment loan originations and purchases.

FNB's distribution of consumer installment loans among borrowers of different income levels is excellent.

Based on the selected sample, the bank originated 25.0 and 31.8 percent of its consumer installment loans to low- and moderate-income borrowers, respectively. This exceeded the percentages of both low- and moderate-income households in the AA.

### **Responses to Complaints**

FNB did not receive any complaints pertaining to the Community Reinvestment Act during the evaluation period.

# Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Consumer Loans Business Loans Home mortgage loans	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Ohio</b>		
Tuscarawas AA	Full-Scope	All of Tuscarawas County

## Appendix B: Summary of MMSA and State Ratings

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Ratings – <b>First National Bank of Dennison</b>	
Overall Bank:	Lending Test Rating
First National Bank of Dennison	Satisfactory
State:	
Ohio	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

**Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

**Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

**Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2019-21</b>		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$ (000)	% 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			
Tuscarawas County	47	4,778	100.0	2,474	0.0	0.0	0.0	10.9	8.5	11.6	80.4	89.4	76.3	8.7	2.1	12.1	0.0	0.0	0.0			
Source: 2015 ACS; 01/01/2019 - 12/31/2021 bank data, 2021 HMDA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%																						

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2019-21</b>		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers					
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate			
Tuscarawas County	47	3,791	100.0	2,474	18.8	12.8	6.9	19.1	19.2	21.8	23.5	25.5	22.5	38.7	42.5	28.9	0.0	0.0	19.8			
Source: 2015 ACS; 01/01/2019 - 12/31/2021 bank data, 2021 HMDA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%																						

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$(000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Tuscarawas County	47	5,249	100.0	1,157	0.0	0.0	0.0	16.7	25.5	13.7	75.1	57.5	74.8	8.1	17.0	11.5	0.0	0.0	0.0	
Source: 2020 D&B data; 01/01/2019 - 12/31/2021 bank data; 2021 CRA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$(000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Tuscarawas County	47	5,249	100.0	1,157	79.2	57.5	53.8	6.6	19.2	14.2	23.4		
Source: 2020 D&B data; 01/01/2019 - 12/31/2021 bank data; 2021 CRA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%													

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2019-21</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Tuscarawas County	44	533	100.0	0.0	0.0	14.6	9.1	77.4	81.8	8.1	9.1	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 bank data. Due to rounding, totals may not equal 100.0%</i>														

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2019-21</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Dennison AA	44	533	100.0	23.3	25.0	16.0	31.8	19.4	29.6	41.3	11.4	0.0	2.2	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 bank data. Due to rounding, totals may not equal 100.0%</i>														

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.