



## **PUBLIC DISCLOSURE**

March 4, 2024

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

The First National Bank of Bellevue  
Charter Number: 2302

120 North Street  
Bellevue, OH 44811

Office of the Comptroller of the Currency

200 Public Square Suite 1620  
Cleveland, OH 44114-2301

**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.

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## **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.
- The Lending Test rating is based on the reasonable distribution of home mortgage loans among borrowers of different incomes.
- A substantial majority of the bank's loans are inside its assessment areas (AAs).

### **Loan-to-Deposit Ratio**

Considering The First National Bank of Bellevue's (FNBB or bank) size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable.

The bank's quarterly average LTD ratios for the period between January 1, 2020, to December 31, 2022, was 68.89 percent, with quarterly ratios ranging from 59.05 percent in the third quarter of 2022 to 84.97 percent in the first quarter of 2020. The quarterly average LTD ratio for eight similarly situated banks was 71.71 percent ranging from a low of 31.2 percent to a high of 110.4 percent.

### **Lending in Assessment Area**

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

The bank originated and purchased 86.7 percent by number and 85.1 percent by dollar amount of its total loans inside the AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
<b>Home Mortgage</b>										
2020	255	87.6	36	12.4	291	38,838	85.8	6,449	14.2	45,286
2021	128	84.8	23	15.2	151	23,176	80.6	5,594	19.4	28,770
2022	63	91.3	6	8.7	69	10,726	92.9	814	7.1	11,540
<b>Total</b>	<b>446</b>	<b>87.3</b>	<b>65</b>	<b>12.7</b>	<b>511</b>	<b>72,740</b>	<b>85.0</b>	<b>12,857</b>	<b>15.0</b>	<b>85,597</b>
<b>Small Business</b>										
2020	31	88.6	4	11.4	35	5,391	86.4	851	13.6	6,242
2021	27	77.1	8	22.9	35	954	78.7	258	21.3	1,212
2022	29	85.3	5	14.7	34	6,976	85.8	1,155	14.2	8131
<b>Total</b>	<b>87</b>	<b>83.7</b>	<b>17</b>	<b>16.3</b>	<b>104</b>	<b>13,321</b>	<b>85.5</b>	<b>2,264</b>	<b>14.5</b>	<b>15,585</b>
<b>Total</b>	<b>533</b>	<b>86.7</b>	<b>82</b>	<b>13.3</b>	<b>615</b>	<b>86,061</b>	<b>85.1</b>	<b>15,121</b>	<b>14.9</b>	<b>101,182</b>

*Source: Bank Data. Evaluation Period – January 1, 2020, to December 31, 2022.  
Due to rounding, totals may not equal 100.0 percent.*

## Description of Institution

FNBB is a full-service intrastate, federally chartered community bank headquartered in Bellevue, Ohio. The bank operates nine full-service branches. The bank is a wholly owned subsidiary of First Bancshares Inc., a one-bank holding company that also operates an affiliate, First Bellevue Properties Inc., which holds the bank's other real estate owned properties. The bank services all of Sandusky and Huron counties, and portions of Erie, Ottawa, and Seneca counties.

As of December 31, 2022, the bank's assets totaled \$296.6 million and tier one capital totaled \$32.8 million or 11.1 percent of total assets. The bank's primary loan products are residential real estate loans and loans to small businesses. Net loans and leases represent 33.4 percent of total assets. During the evaluation period, the bank's loan portfolio decreased approximately 7.2 percent to \$170.6 million.

The bank offers traditional home loan products, including home mortgage loans, home equity loans, home equity lines of credit, and home construction loans. The bank also offers auto and boat loans. The bank's consumer deposit-related products and services include checking, savings, and money market accounts, certificates of deposit, individual retirement accounts, online banking, bill pay, mobile banking, mobile deposits, and ATM services.

As of December 31, 2022, the loan portfolio was comprised of residential real estate loans (\$37.3 million or 21.9 percent), non-farm or non-residential loans (\$82.3 million or 48.2 percent), multifamily loans (\$5.7 million or 3.3 percent), commercial and industrial loans (\$25.7 million or 15.1 percent), consumer loans (\$4.3 million or 2.5 percent), construction loans (\$5.7 million or 3.4 percent), farmland

loans (\$5.4 million or 3.2 percent), loans to depository institutions (\$2.4 million or 1.4 percent), and agricultural production loans (\$1.6 million or 1.0 percent).

The bank has two AAs. The first is the Non-Metropolitan Statistical Area (Non-MSA) AA and consists of the entire counties of Sandusky and Huron counties and portions of Erie and Seneca counties. The second AA is the Toledo AA consisting of a portion of Ottawa county. The Non-MSA AA has 48 census tracts (CTs) and the Toledo AA has ten CTs. The AAs comply with regulatory requirements and do not arbitrarily exclude any low- or moderate-income geographies. The bank opened two branches during the evaluation period and did not close any branches. The first branch was opened in 2020 in Sandusky, OH. The second was opened in 2022 in Norwalk, OH.

Based on Federal Deposit Insurance Corporation (FDIC) Deposit Market Share reports from June 30, 2019, and June 30, 2022, deposits at the bank for the non-MSA AA increased from \$128 million to \$171 million. Based on Federal Deposit Insurance Corporation (FDIC) Deposit Market Share reports from June 30, 2019, and June 30, 2022, deposits at the bank for the Toledo AA have increased from \$68 million to \$93 million.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the AAs. The bank received an overall rating of "Satisfactory" at the prior CRA performance evaluation dated February 1, 2021.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The OCC evaluated the bank using small bank performance criteria, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The evaluation period for the lending test is January 1, 2020, through December 31, 2022.

Based on the bank's internal reports and discussions with management, examiners determined that the bank's primary lending product during the evaluation period was home mortgages loans and small loans to small businesses. Examiners used other supporting information during the performance evaluation, including the 2015 American Community Survey (ACS) data, 2020 U.S. Census data, internal bank records, deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AA. The bank's 2022 performance is evaluated separately utilizing 2020 U.S. Census data which reflects updated population and housing demographic information, as well as changes to the number and income designations of some CTs. The Non-MSA AA received more weight, as this AA includes a larger portion of the bank's lending activity. Examiners also considered information from a community contact to help assess the needs of the bank's AA.

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

Examiners performed a full-scope reviews of the Non-MSA AA and Toledo AA, part of the Toledo, OH MSA. The AA includes the entire counties of Sandusky and Huron counties, and portions of Erie, Ottawa, and Seneca counties and does not arbitrarily exclude any low- or moderate-income CTs.

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined

and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

The bank’s overall rating is based on its Ohio lending performance within the AA.

Examiners weighed information from the following performance criteria when analyzing the bank’s primary lending products: LTD ratio, lending within the AA, lending to borrowers of different incomes and the geographic distribution of loans. Refer to the “Scope” paragraph within the “State” section of this document for details regarding how the areas were weighted in arriving at the respective ratings.

The MMSA rating 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 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 Bureau of Consumer Financial Protection, 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<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory.

The major factors that support this rating include:

- The bank's distribution of home mortgage loans to borrowers of different income levels is reasonable.
- A reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- A substantial majority of loans are inside the bank's AAs.
- A reasonable loan-to-deposit (LTD) ratio.

### Description of Institution's Operations in Ohio

During the evaluation period, the bank operated nine full-service branches within the AAs. Eight of the bank's nine branch locations are open Monday through Saturday and offer drive-through services. These eight branches offer the same service hours. The Put-In-Bay branch is located on an island and offers seasonal hours to align with seasonal tourism. Non-deposit taking automated teller machines (ATMs) are located at each branch and offer 24-hour accessibility. The bank did not close any branches during the evaluation period. The bank opened two branches during the evaluation period, one in 2020 and one in 2022. The main office is located in a middle-income CT. Three of the remaining branches are located in moderate-income CTs, three in middle-income CTs and two in upper-income CTs.

The Non-MSA AA, comprised of the entire counties of Sandusky and Huron counties and portions of Erie and Seneca counties, complies with regulatory requirements. Based on 2015 ACS the AA had 47 CTs consisting of eight moderate-income CTs, 27 middle-income CTs, and twelve upper-income CTs. According to the 2020 U.S. Census data, there are now 48 CTs, one low-income CT, seven moderate-income CT, 28 middle-income CTs, and twelve upper-income CTs in the Non-MSA AA. The change was due to one additional middle-income CT.

Banking competition within the AA is high. According to the June 30, 2022, FDIC Deposit Market Share Report, there are eighteen financial institutions with 82 offices serving the Non-MSA AA. The bank is ranked tenth in terms of deposit market share in the AA, with 2.9 percent of total deposits. The top five institutions in the June 2022 report had a market share of 64.8 percent. Banks in the AA include Sutton Bank, Civista Bank, The Croghan Colonial Bank, PNC Bank N.A., and The Old Fort Banking Company.

The largest cities in the Non-MSA AA in Sandusky County are Fremont and Clyde, and in Huron County are Norwalk and Willard. Prominent industries include manufacturing, health care and social

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.



assistance, agriculture, accommodation and food services, educational services and retail trade. Major employers in Sandusky County include Whirlpool Corporation, Revere Plastics, and Sandusky County. Huron County major employers include Fisher-Titus Medical Center, MTD Products/Midwest Industries, KSC Communications, and Pepperidge Farms, Inc. As of December 31, 2022, the unemployment rate in Sandusky County was 4.0 percent, Huron County was 5.4 percent, Erie County was 4.6 percent, and Seneca County was 3.7 percent, which are all above the state unemployment rate of 3.5 percent.

The Toledo AA complies with regulatory requirements and consists of a portion on Ottawa County. Based on 2015 ACS and the 2020 U.S. Census data, the AA had ten CTs. The AA did not contain any low- or moderate-income CTs during the evaluation period. According to the 2020 U.S. Census data, there are six middle-income CTs, and four upper-income CTs in the Toledo AA. One middle-income CT changed to an upper-income CT based on the 2020 U.S. Census data.

Banking competition within the AA is high. According to the June 30, 2022, FDIC Deposit Market Share Report, there are eleven financial institutions with 24 offices serving the Toledo AA. FNBB is ranked fifth in terms of deposit market share in the AA, with 8.7 percent of total deposits. The top four institutions in the June 2022 report had a market share of 72.4 percent. Banks in the AA include The Huntington National Bank, The Genoa Banking Company, The Croghan Colonial Bank, and U.S. Bank N.A.

The largest cities in the AA in Ottawa County are Port Clinton and Catawba Island. Prominent industries include manufacturing, health care and social assistance, educational services and retail trade. Major employers in Ottawa County include Gentex, Herman Miller, and Perrigo. As of December 31, 2022, the unemployment rate in Ottawa County was 3.8 percent, which is above the state unemployment rate of 3.5 percent.

Examiners considered information obtained from two community contacts within the AA to gain an understanding of the community development needs and credit opportunities of the AAs. The community organizations focus on affordable housing and community services to low- and moderate-income individuals. They identified the following needs in the bank's AAs: affordable, quality, and safe housing, food assistance, financial literacy, homebuyer counseling, reliable transportation, and childcare. They also noted the need for bank personnel to volunteers for financial literacy, VITA, funding for general operating support and programs, down payment assistance, mental health resources and treatment, low-cost rehab loan facilities, transportation programs, grants for car repairs, and referrals for small business loans.

**Non-MSA AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2020-2021 Non-MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	47	0.0	17.0	57.4	25.5	0.0
Population by Geography	197,430	0.0	14.5	58.7	26.8	0.0
Housing Units by Geography	89,150	0.0	15.2	57.9	26.9	0.0
Owner-Occupied Units by Geography	55,955	0.0	10.5	58.8	30.6	0.0
Occupied Rental Units by Geography	22,383	0.0	27.1	57.7	15.2	0.0
Vacant Units by Geography	10,812	0.0	14.4	53.7	31.9	0.0
Businesses by Geography	11,244	0.0	16.3	54.0	29.7	0.0
Farms by Geography	855	0.0	3.0	56.0	40.9	0.0
Family Distribution by Income Level	52,464	17.6	17.9	21.3	43.2	0.0
Household Distribution by Income Level	78,338	21.0	15.7	18.9	44.4	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$121,273
			Median Gross Rent			\$659
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2022 Non-MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	48	2.1	14.6	58.3	25.0	0.0
Population by Geography	195,005	1.3	12.2	58.0	28.5	0.0
Housing Units by Geography	89,431	1.5	13.2	57.1	28.1	0.0
Owner-Occupied Units by Geography	56,431	0.9	10.2	56.9	32.0	0.0
Occupied Rental Units by Geography	22,434	2.8	21.6	58.7	16.9	0.0
Vacant Units by Geography	10,566	2.0	11.8	54.8	31.3	0.0
Businesses by Geography	16,542	1.8	12.0	52.5	33.7	0.0
Farms by Geography	1,068	0.4	4.2	57.1	38.3	0.0
Family Distribution by Income Level	51,180	17.2	18.4	23.1	41.3	0.0
Household Distribution by Income Level	78,865	20.6	16.1	19.9	43.4	0.0
Median Family Income Non-MSAs - OH		\$66,684	Median Housing Value			\$129,338
			Median Gross Rent			\$739
			Families Below Poverty Level			8.9%
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

**Toledo MSA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2020-2021 Toledo AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	10	0.0	0.0	70.0	30.0	0.0
Population by Geography	26,724	0.0	0.0	84.3	15.7	0.0
Housing Units by Geography	22,191	0.0	0.0	76.8	23.2	0.0
Owner-Occupied Units by Geography	9,168	0.0	0.0	81.4	18.6	0.0
Occupied Rental Units by Geography	2,732	0.0	0.0	87.0	13.0	0.0
Vacant Units by Geography	10,291	0.0	0.0	70.0	30.0	0.0
Businesses by Geography	2,238	0.0	0.0	80.6	19.4	0.0
Farms by Geography	103	0.0	0.0	82.5	17.5	0.0
Family Distribution by Income Level	7,901	16.9	18.2	21.8	43.1	0.0
Household Distribution by Income Level	11,900	17.4	17.0	20.4	45.2	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$60,742	Median Housing Value			\$168,114
			Median Gross Rent			\$727
			Families Below Poverty Level			8.5%
<i>Source: 2015 ACS and 2021 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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2022 Toledo AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	10	0.0	0.0	60.0	40.0	0.0
Population by Geography	24,161	0.0	0.0	64.3	35.7	0.0
Housing Units by Geography	20,516	0.0	0.0	55.3	44.7	0.0
Owner-Occupied Units by Geography	9,046	0.0	0.0	63.9	36.1	0.0
Occupied Rental Units by Geography	2,492	0.0	0.0	74.0	26.0	0.0
Vacant Units by Geography	8,978	0.0	0.0	41.5	58.5	0.0
Businesses by Geography	2,994	0.0	0.0	65.3	34.7	0.0
Farms by Geography	121	0.0	0.0	42.1	57.9	0.0
Family Distribution by Income Level	6,948	17.0	17.1	19.2	46.7	0.0
Household Distribution by Income Level	11,538	20.5	15.3	20.2	44.0	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$70,917	Median Housing Value			\$205,913
			Median Gross Rent			\$713
			Families Below Poverty Level			5.9%

Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Ohio

This analysis reflects a full-scope review of the Non-MSA, and Toledo AAs. Examiners considered the number of home mortgage loans originated or purchased and small loans to small businesses by the bank from January 1, 2020, through December 31, 2022. Examiners gave more weight to the distribution of loans to individuals of different income levels, businesses of different sizes and the Non-MSA AA. The Non-MSA AA is the primary lending area and the bank made loans to low- and moderate-income borrowers despite the CT composition in their AAs. The geographic distribution of home mortgage loans and businesses of different sizes was given less weight due to the limited number of low- and moderate-income CTs in the Non-MSA AA, and none in the Toledo AA. Examiners also considered any factors affecting the bank's ability to lend in its AA during the evaluation period, such as demographic and market share information.

## LENDING TEST

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

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Non-MSA AA and Toledo AA is reasonable.

## Distribution of Loans by Income Level of the Geography

The bank exhibits poor geographic distribution of loans in the State of Ohio.

### *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.

### Non-MSA

#### 2020-2021

The bank's distribution of home mortgage loans among geographies of different income levels in Non-MSA AA is poor. There were no low-income CTs with this AA during the evaluation period. The bank's percentage of home mortgage loans among moderate-income CTs in the AA was 5.9 percent. This is below the 10.6 percent of the AAs owner-occupied housing units in moderate-income geographies and the 11.5 percent of aggregate bank lending.

#### 2022

The bank's distribution of home mortgage loans among geographies of different income levels in Non-MSA AA is poor. The bank did not make any home mortgage loans among low-income CTs in the AA.

The percentage of owner-occupied housing units in low-income CT geographies was 0.9 percent and the aggregate bank lending percentage was 1.3 percent. The bank's percentage of home mortgage loans among moderate-income CTs in the AA was 3.9 percent. This is below the 10.2 percent of the AAs owner-occupied housing units in moderate-income geographies and is below the 11.0 percent of aggregate bank lending.

### **Toledo MSA**

Examiners did not perform an analysis for the Toledo MSA as there were no low- or moderate-income CTs in the bank's AA during the evaluation period.

### ***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.

### **Non-MSA**

#### 2020-2021

The bank's distribution of small loans to businesses among geographies of different income levels in the Non-MSA during 2020-2021 is poor. There were no low-income CTs during 2020-2021. The bank's percentage of small loans to businesses among geographies of moderate-income CTs was 8.5 percent. This is below the 17.3 percent of businesses in moderate-income CT geographies and below the 17.6 percent aggregate bank lending.

#### 2022

The bank's distribution of small loans to businesses among geographies of different income levels in the Non-MSA in 2022 is reasonable. The bank did not make any small loans to businesses among geographies of low-income CTs. The bank's percentage of small loans to businesses among geographies of moderate-income CTs was 9.1 percent. This is slightly below the 12.0 percent of businesses in moderate-income CT geographies and below the 13.7 percent aggregate bank lending.

### **Toledo MSA**

Examiners did not perform an analysis for the Toledo MSA since there was not a sufficient number of loans to perform an adequate analysis.

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

The bank 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.

**Non-MSA**2020-2021

The bank's distribution of home mortgage loans to borrowers of different income levels in the Non-MSA AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 5.6 percent. This is below the 17.7 percent of low-income families living in the AA but near the 7.0 percent aggregate bank lending level. The bank's percentage of home mortgage loans to moderate-income borrowers is 20.4 percent. It exceeds the 18.0 percent of moderate-income families living in the AA and 19.8 percent aggregate bank lending.

2022

The bank's distribution of home mortgage loans to borrowers of different income levels in the Non-MSA AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 7.8 percent. This is below the 17.2 percent of low-income families living in the AA, but near the 8.8 percent aggregate bank lending. The bank's percentage of home mortgage loans to moderate-income borrowers is 31.4 percent. It exceeds the 18.4 percent of moderate-income families living in the AA and exceeds the 22.4 percent aggregate bank lending level.

**Toledo AA**2020-2021

The bank's distribution of home mortgage loans to borrowers of different income levels in the Toledo MSA AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 7.1 percent. This is below the 16.9 percent of low-income families living in the AA but above 4.7 percent aggregate bank lending. The bank's percentage of home mortgage loans to moderate-income borrowers is 20.4 percent. It exceeds the 18.2 percent of moderate-income families living in the AA and the 13.2 percent aggregate bank lending.

2022

The bank's distribution of home mortgage loans to borrowers of different income levels in the Toledo MSA AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 8.3 percent. This is below the 17.0 percent of low-income families living in the AA but above the 5.3 percent aggregate bank lending level. The bank's percentage of home mortgage loans to moderate-income borrowers is 8.3 percent. It is below the 17.1 percent of moderate-income families living in the AA and the 14.1 percent aggregate bank lending level.

***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 originations and purchases of small loans to businesses.

## **Non-MSA**

### 2020-2021

The bank's distribution of small loans to businesses among businesses of different sizes in the Non-MSA during 2020-2021 is reasonable. The bank's percentage of small loans to businesses with revenues less than \$1 million was 25.3 percent. This is below the 81.2 percent of businesses with revenues less than \$1 million in the AA and the 49.1 percent of aggregate bank lending. However, this percentage was impacted by the significant number of PPP loans where revenues were not available.

### 2022

The bank's distribution of small loans to businesses among businesses of different sizes in the Non-MSA during 2022 is reasonable. The bank's percentage of small loans to businesses with revenues less than \$1 million was 63.6 percent. This is below the 85.2 percent of businesses with revenues less than \$1 million in the AA, but higher than the 58.1 percent of aggregate bank lending.

## **Toledo MSA**

The OCC did not perform an analysis for the Toledo MSA since there was not a sufficient number of loans to perform an adequate analysis.

## **Responses to Complaints**

The bank did not receive any CRA-related complaints 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>	01/01/2020 to 12/31/2022	
<b>Bank Products Reviewed:</b>	Home mortgage, small business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable	Not Applicable	No affiliate products reviewed.
<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>
Non-MSA AA	Full Scope	Erie County CTs – 403, 404, 405, 406 (419 for 2022 instead of 406), 407, 408, (408.01 & 408.02 for 2022) 409, 410, 411, 412, 413, 414, 415, 416, 417 (417.01 & 417.02 for 2022), and 418. Seneca County – 9625, 9626, 9638
Toledo AA	Full Scope	Ottawa County CTs – 501, 502, 502.01, 502.02, 503.01, 503.02, 505, 506, 507, 508, and 512.
<b>States</b>		
Ohio		



## Appendix B: Summary of MMSA and State Ratings

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RATINGS	The First National Bank of Bellevue
Overall Bank:	Lending Test Rating
The First National Bank of Bellevue	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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Non MSA AA	270	43,230,066	100.0	7,001	0.0	0.0	0.0	10.6	5.9	11.5	59.2	72.6	56.3	30.2	21.5	32.3	0.0	0.0	0.0
<b>Total</b>	<b>270</b>	<b>43,230,066</b>	<b>100.0</b>	<b>7,001</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>10.6</b>	<b>5.9</b>	<b>11.5</b>	<b>59.2</b>	<b>72.6</b>	<b>56.3</b>	<b>30.2</b>	<b>21.5</b>	<b>32.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Non MSA AA	51	7,949,252	100.0	4,788	0.9	0.0	1.3	10.2	3.9	11.0	56.9	66.7	56.4	32.0	29.4	31.4	0.0	0.0	0.0
<b>Total</b>	<b>51</b>	<b>7,949,252</b>	<b>100.0</b>	<b>4,788</b>	<b>0.9</b>	<b>0.0</b>	<b>1.3</b>	<b>10.2</b>	<b>3.9</b>	<b>11.0</b>	<b>56.9</b>	<b>66.7</b>	<b>56.4</b>	<b>32.0</b>	<b>29.4</b>	<b>31.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Toledo AA	113	18,783,082	100.0	1,671	0.0	0.0	0.0	0.0	0.0	0.0	81.4	63.7	72.7	18.6	36.3	27.3	0.0	0.0	0.0
<b>Total</b>	<b>113</b>	<b>18,783,082</b>	<b>100.0</b>	<b>1,671</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>81.4</b>	<b>63.7</b>	<b>72.7</b>	<b>18.6</b>	<b>36.3</b>	<b>27.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Toledo AA	12	2,776,350	100.0	955	0.0	0.0	0.0	0.0	0.0	0.0	63.9	41.7	56.5	36.1	58.3	43.5	0.0	0.0	0.0
<b>Total</b>	<b>12</b>	<b>2,776,350</b>	<b>100.0</b>	<b>955</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>63.9</b>	<b>41.7</b>	<b>56.5</b>	<b>36.1</b>	<b>58.3</b>	<b>43.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
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
Non MSA AA	270	43,230,066	100.0	7,001	17.7	5.6	7.0	18.0	20.4	19.8	21.3	23.7	23.9	43.0	47.4	34.5	0.0	3.0	14.9
<b>Total</b>	<b>270</b>	<b>43,230,066</b>	<b>100.0</b>	<b>7,001</b>	<b>17.7</b>	<b>5.6</b>	<b>7.0</b>	<b>18.0</b>	<b>20.4</b>	<b>19.8</b>	<b>21.3</b>	<b>23.7</b>	<b>23.9</b>	<b>43.0</b>	<b>47.4</b>	<b>34.5</b>	<b>0.0</b>	<b>3.0</b>	<b>14.9</b>

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
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
Non MSA AA	51	7,949,252	100.0	4,788	17.2	7.8	8.8	18.4	31.4	22.4	23.1	17.6	23.8	41.3	25.5	28.7	0.0	17.6	16.3
<b>Total</b>	<b>51</b>	<b>7,949,252</b>	<b>100.0</b>	<b>4,788</b>	<b>17.2</b>	<b>7.8</b>	<b>8.8</b>	<b>18.4</b>	<b>31.4</b>	<b>22.4</b>	<b>23.1</b>	<b>17.6</b>	<b>23.8</b>	<b>41.3</b>	<b>25.5</b>	<b>28.7</b>	<b>0.0</b>	<b>17.6</b>	<b>16.3</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
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
Toledo AA	113	18,783,082	100.0	1,671	16.9	7.1	4.7	18.2	20.4	13.2	21.8	21.2	16.4	43.1	50.4	54.9	0.0	0.9	10.8
<b>Total</b>	<b>113</b>	<b>18,783,082</b>	<b>100.0</b>	<b>1,671</b>	<b>16.9</b>	<b>7.1</b>	<b>4.7</b>	<b>18.2</b>	<b>20.4</b>	<b>13.2</b>	<b>21.8</b>	<b>21.2</b>	<b>16.4</b>	<b>43.1</b>	<b>50.4</b>	<b>54.9</b>	<b>0.0</b>	<b>0.9</b>	<b>10.8</b>

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
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
Toledo AA	12	2,776,350	100.0	955	17.0	8.3	5.3	17.1	8.3	14.1	19.2	8.3	15.0	46.7	75.0	53.7	0.0	0.0	11.8
<b>Total</b>	<b>12</b>	<b>2,776,350</b>	<b>100.0</b>	<b>955</b>	<b>17.0</b>	<b>8.3</b>	<b>5.3</b>	<b>17.1</b>	<b>8.3</b>	<b>14.1</b>	<b>19.2</b>	<b>8.3</b>	<b>15.0</b>	<b>46.7</b>	<b>75.0</b>	<b>53.7</b>	<b>0.0</b>	<b>0.0</b>	<b>11.8</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

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																			2020-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Non MSA	47	5,811	100	1,513	0.0	0.0	0.0	17.3	8.5	17.6	41.1	57.5	36.8	41.6	34	45.6	0.0	0.0	0.0	
<b>Total</b>	<b>47</b>	<b>5,811</b>	<b>100</b>	<b>1,513</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>17.3</b>	<b>8.5</b>	<b>17.6</b>	<b>41.1</b>	<b>57.5</b>	<b>36.8</b>	<b>41.6</b>	<b>34</b>	<b>45.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2020 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022	
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	
Non MSA AA	22	4,419	100	2,915	1.8	0.0	1.2	12.0	9.1	13.8	52.5	59.1	58.0	33.7	31.8	26.0	0.0	0.0	1.1	
<b>Total</b>	<b>22</b>	<b>4,419</b>	<b>100</b>	<b>2,915</b>	<b>1.8</b>	<b>0.0</b>	<b>1.2</b>	<b>12.0</b>	<b>9.1</b>	<b>13.8</b>	<b>52.5</b>	<b>59.1</b>	<b>58.0</b>	<b>33.7</b>	<b>31.8</b>	<b>26.0</b>	<b>0.0</b>	<b>0.0</b>	<b>1.1</b>	

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

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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Non MSA AA	47	5,811	100	470	81.2	25.3	49.1	4.9	21.3	13.9	53.1
<b>Total</b>	<b>47</b>	<b>5,811</b>	<b>100</b>	<b>470</b>	<b>81.2</b>	<b>25.3</b>	<b>49.1</b>	<b>4.9</b>	<b>21.3</b>	<b>13.9</b>	<b>53.1</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
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
Non-MSA AA	22	4,419	100	2,915	85.2	63.6	58.1	4.0	36.4	10.8	0.0
<b>Total</b>	<b>22</b>	<b>4,419</b>	<b>100</b>	<b>2,915</b>	<b>85.2</b>	<b>63.6</b>	<b>58.1</b>	<b>4.0</b>	<b>36.4</b>	<b>10.8</b>	<b>0.0</b>

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

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.