



## PUBLIC DISCLOSURE

July 18, 2022

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Consumers National Bank

**Charter Number 15543**

614 East Lincoln Way  
Minerva, Ohio 44657

Office of the Comptroller of the Currency  
Northern Ohio Office  
200 Public Square Suite 1610  
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 community development test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on the reasonable distribution of home mortgage loans and small loans to businesses among borrowers of different incomes, reasonable geographic distribution of home mortgages and small loans to businesses, a substantial majority of loans in their AAs, and a reasonable loan-to-deposit ratio.
- The Community Development (CD) Test rating is based on an adequate responsiveness to community needs through qualified CD loans, investments and services and its capacity to participate.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is reasonable.

We evaluated Consumers National Bank (CNB) quarterly loan-to-deposit (LTD) ratio for the periods between January 1, 2019, and December 31, 2021. The bank's average LTD ratio during this period was 79.04 percent, with quarterly ratios ranging from 67.39 percent to 87.73 percent. We also compared CNB's LTD ratio to one peer bank with assets of \$100.2 million located in Stark County. CNB's performance exceeded the peer bank, as their LTD ratios averaged was 53.18 percent.

### Lending in Assessment Area

A substantial majority of the bank's loans are inside its assessment areas (AAs).

The bank originated and purchased 80.0 percent of its total loans inside the bank's 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 the other performance criteria.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2019	127	88.8	16	11.2	143	26,378	83.9	5,080	16.1	31,459
2020	142	75.9	45	24.1	187	29,960	74.6	10,182	25.4	40,143
2021	246	80.7	59	19.3	305	45,764	67.6	21,936	32.4	67,700
<b>Subtotal</b>	<b>515</b>	<b>81.1</b>	<b>120</b>	<b>18.9</b>	<b>635</b>	<b>102,103</b>	<b>73.3</b>	<b>37,198</b>	<b>26.7</b>	<b>139,302</b>
Small Business										
2019	50	86.2	8	13.8	58	7,893	87.5	1,129	12.5	9,022
2020	44	73.3	16	26.7	60	6,542	75.1	2,169	24.9	8,711
2021	41	69.5	18	30.5	59	15,481	85.8	2,560	14.2	18,041
<b>Subtotal</b>	<b>135</b>	<b>76.3</b>	<b>42</b>	<b>23.7</b>	<b>177</b>	<b>29,916</b>	<b>83.6</b>	<b>5,858</b>	<b>16.4</b>	<b>35,774</b>
<b>Total</b>	<b>650</b>	<b>80.0</b>	<b>162</b>	<b>20.0</b>	<b>812</b>	<b>132,019</b>	<b>75.4</b>	<b>43,056</b>	<b>24.6</b>	<b>175,075</b>
<i>Source: Bank Data</i>										
<i>Due to rounding, totals may not equal 100.0%</i>										

## Description of Institution

CNB is a full-service intrastate community bank headquartered in Minerva, Ohio. The bank is a wholly owned subsidiary of Consumers Bancorp, Inc., a one-bank holding company, which is also headquartered in Minerva, Ohio. As of December 31, 2021, the bank had \$954.8 million in total assets, and tier one capital totaled \$70.5 million or 7.4 percent of total assets. The bank has four AAs which are Stark and Carroll AA, Columbiana AA, Jefferson AA, and Summit AA. Its primary AAs are its Stark and Carroll AA, which contains Stark County and Carroll County, and its Columbiana AA, which contains Columbiana County. Stark and Carroll Counties are part of the Canton-Massillon, OH Metropolitan Statistical Areas (MSA), while Columbiana County is not part of an MSA. Jefferson AA contains Jefferson County is part of the Weirton-Steubenville, WV-OH MSA. Summit AA contains Summit County and is not part of an MSA.

CNB's primary loan product is residential real estate loans and loans to small businesses. From December 31, 2018, to December 31, 2021, the bank's loan portfolio increased by 86.4 percent to \$623.9 million. As of December 31, 2021, the loan portfolio was comprised of residential real estate loans (\$185.6 million or 29.8 percent), nonfarm nonresidential properties (\$214.3 million or 34.3 percent), commercial and industrial (\$82.4 million or 13.2 percent), consumer loans (\$36.5 million or 5.9 percent), construction (\$31.7 million or 5.1 percent) and farm (\$39.3 million or 6.3 percent).

Based on Federal Deposit Insurance Corporation (FDIC) Deposit Market Share reports from June 30, 2018, and June 30, 2021, deposits at the bank have increased from \$430 million to \$727 million. As of the June 30, 2021, \$465 million (64.0 percent) of the total deposits were from the Stark and Carroll AA, \$154 million (21.2 percent) were from the Columbiana AA, \$90 million (12.4 percent) were from the Jefferson AA, and \$17 million (2.3 percent) were from Summit AA.

CNB offers traditional home loan products, including home mortgage loans, home construction loans, consumer loans, home equity loans, home equity lines of credit (HELOC), Federal Housing Administration (FHA)/ Veterans Administration (VA)/ United States Department of Agriculture (USDA), and offers commercial loans. The bank's consumer deposit-related products and services include checking, savings, money market, and certificates of deposit. Digital banking includes online bill payment, mobile banking, overdraft protection, safe deposit boxes, and ATM services. Business-related deposit products and services include checking and savings accounts and cash management services. 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 a "Satisfactory" rating on their previous Community Reinvestment Act (CRA) performance evaluation dated July 8, 2019.

## **Scope of the Evaluation**

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

This performance evaluation covers the period from January 1, 2019, to December 31, 2021. We performed a full-scope review using Intermediate Small Bank CRA examination procedures. This performance evaluation assesses CNB's record of meeting the credit needs of its AAs. The lending test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities and uses home mortgage loans reported by the bank under the Home Mortgage Disclosure Act (HMDA). In addition, we selected a sample of small loans to businesses for evaluation.

Based on the bank's internal reports for lending activity during the evaluation period and discussions with management, we determined that the bank's primary lending focus during the evaluation period was home mortgage and small loans to businesses. While the bank offers farm, multi-family, home equity, and consumer installment loans, these products are not a primary focus for the bank, and as a result are not considered in this evaluation. Therefore, we did not evaluate the bank based on these loan products, as an analysis of this data would not be meaningful.

We also utilized other supporting information while evaluating CNB's CRA performance. Additional supporting information included 2015 American Community Survey (ACS) data, internal bank records, deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AAs. We also considered information from community contacts to help assess the needs of the bank's AAs.

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

All of the bank's AAs are in the state of Ohio. We selected CNB's Carroll and Stark AA, Columbiana AA and Jefferson AA for full-scope reviews. These AAs contain most of the bank's branches and provide most of its deposit base and loan business. We completed a limited-scope review for the Summit AA. Refer to the Scope of Evaluation in Ohio section 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.

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 AAs 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**

CNB’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The bank’s overall rating is based on performance within the bank’s AAs. We weighed information from the following performance criteria when analyzing the bank’s primary lending product: loan-to-deposit ratio, lending within the AA, lending to borrowers of different incomes and the geographic distribution of loans. The most weight was given to the Carroll and Stark and Columbiana AAs because this is the bank’s primary market in deposit and lending.

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 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<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The bank's distribution of home mortgage loans and small loans to businesses to borrowers of different income levels is reasonable.
- The bank's geographic distribution of home mortgage loans and small loans to businesses is reasonable.
- The bank's loan-to-deposit ratio is reasonable.
- The bank made a substantial majority of loans inside its AAs.
- The bank originated an adequate level of CD loans and investments.

### Description of Institution's Operations in Ohio

CNB's operations in Ohio consists of four AAs, which include the Carroll and Stark AA, Columbiana AA, Jefferson AA, and Summit AA.

CNB has twenty-one full-services branches. There are a total of ten branches (with the main office) in the Stark and Carroll AA, five offices in Columbiana AA, four offices in the Jefferson AA, and two in the Summit AA. The bank opened or acquired six branches during the evaluation period. One branch, Green Town Park, was opened in the Summit County AA in April 2021. Three branches, Adena, Dillonvale and Mt. Pleasant were acquired when CNB merged with The Peoples National Bank of Mt. Pleasant in January 2020. All three branches are in the Jackson County AA. The Calcutta and Wellsville were purchased from CF Bank in July 2021. These branch offices are in the Columbiana County AA. Each branch, except for the Adena and Mt. Pleasant, has an onsite deposit-taking ATM. Excluding one branch in the Summit AA, every branch also offers drive-through services. The bank also has a loan production office in Wayne County. Below is further information on the AAs.

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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 the MMSA.

**Carroll and Stark AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Consumers National Bank Carroll and Stark 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)	93	9.7	11.8	63.4	14.0	1.1
Population by Geography	403,340	6.3	10.7	65.7	17.0	0.3
Housing Units by Geography	179,072	6.8	11.4	65.7	15.5	0.5
Owner-Occupied Units by Geography	112,214	3.4	8.2	69.8	18.6	0.0
Occupied Rental Units by Geography	49,143	12.3	17.3	57.7	11.4	1.3
Vacant Units by Geography	17,715	13.4	15.2	62.2	7.8	1.4
Businesses by Geography	25,016	5.1	6.9	65.7	19.9	2.4
Farms by Geography	995	1.4	1.9	80.3	16.2	0.2
Family Distribution by Income Level	106,626	19.6	18.7	21.9	39.8	0.0
Household Distribution by Income Level	161,357	23.7	16.4	18.4	41.5	0.0
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$59,302	Median Housing Value			\$117,531
			Median Gross Rent			\$660
			Families Below Poverty Level			10.7%
<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>						

The Carroll and Stark County AA, based on 2020 U.S. Census data, is comprised of nine low-income census tracts (CTs) and 11 moderate-income CTs. All nine low-income CTs, and 11 moderate-income CTs, were in Stark County and concentrated in the cities of Canton, Massillon, and Alliance, Ohio. All CTs in Carroll County are middle-income (with the exception of one CT where income level is unknown). The AA has 59 middle-income and 13 upper-income CTs. CNB's headquarters is located in Minerva, Ohio. Ten of the bank's 21 branches are located in the Stark and Carroll AA.

Banking competition within the AA is high. According to the June 30, 2021, Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, there are 18 financial institutions with 106 offices serving the Carroll and Stark AA. CNB is ranked 7th in terms of deposit market share in the AA, with 4.70 percent of total deposits. The top five institutions have a market share of 78.8 percent. The largest institutions include The Huntington National Bank, JP Morgan Chase National Association, KeyBank National Association, First Commonwealth Bank, and Citizens Bank National Association. Based on the June 30, 2021, FDIC Deposit Market Share Report, 64 percent of the bank's total deposits are from this AA.

Based on 2021 peer aggregate home mortgage lending data, CNB was ranked 30 of 333 with an 0.79 percent market share in the AA. The top five lenders have a market share of 35.6 percent.

The five largest lenders include Huntington National Bank, Rocket Mortgage, Crosscountry Mortgage, LLC, CBNA Year to Date, and Signature Mortgage Corporation.

The AA is a mix of rural and urban areas, and its population declined slightly from 403,340 persons according to 2015 ACS data, to 401,574 persons according to the 2020 U.S. Census data. The largest cities in the AA are Canton, Massillon, and Alliance, all of which are in Stark County. The economy is driven largely by manufacturing, retail, health care and social assistance. Major employers include Aultman Hospital, The Timken Company, and Mercy Medical Center. Canton is home to the Pro Football Hall of Fame. The unemployment rates in Stark and Carroll Counties were 3.6 and 4.1 percent, respectively, as of December 31, 2021. These rates were at or near the state unemployment rate of 3.6 percent.

As part of the evaluation process, we conducted one community contact within the Stark County AA. The community organization focuses on providing affordable housing and social services to low- and moderate-income individuals and families. The organization noted basic needs in the AA include finances, stable employment, childcare, affordable-housing, and healthcare. The organization needs include general operating support, financial literacy grant support, workforce development program support, participation on Board of Directors, and future and permanent mortgage for their current leased location.

## Columbiana AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Consumers National Bank Columbiana 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)	24	0.0	12.5	75.0	12.5	0.0
Population by Geography	105,987	0.0	8.0	80.7	11.3	0.0
Housing Units by Geography	46,777	0.0	8.1	80.1	11.8	0.0
Owner-Occupied Units by Geography	29,930	0.0	5.7	82.0	12.3	0.0
Occupied Rental Units by Geography	12,157	0.0	11.8	78.3	9.9	0.0
Vacant Units by Geography	4,690	0.0	14.3	72.7	12.9	0.0
Businesses by Geography	5,288	0.0	4.9	79.6	15.5	0.0
Farms by Geography	332	0.0	0.6	82.5	16.9	0.0
Family Distribution by Income Level	28,616	20.8	19.0	21.7	38.6	0.0
Household Distribution by Income Level	42,087	23.9	16.4	18.6	41.1	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$101,554
			Median Gross Rent			\$606
			Families Below Poverty Level			11.3%
<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>						

The Columbiana AA, based on 2020 U.S. Census data, there were no low-income census tracts (CTs) and three moderate-income CTs, 18 middle-income and three upper-income CTs. Five of CNB's 21 branches are in this AA.

Banking competition within the AA is high. According to the June 30, 2021, FDIC Deposit Market Share Report, there are 10 financial institutions with 33 offices serving Columbiana County. CNB is ranked 6th in terms of deposit market share in the AA, with 8.18 percent of total deposits. The top five institutions have a market share of 84.5 percent. The largest institutions include The Huntington National Bank, Premier Bank, The Farmers National Bank of Canfield, JP Morgan Chase National Association, and PNC Bank National Association. Based on the June 30, 2021, FDIC Deposit Market Share Report, 21.24 percent of the bank's total deposits are from this AA.

Based on 2021 peer aggregate home mortgage lending data, CNB was ranked 19th of 179 with a 1.33 percent market share in the AA. The top five lenders have a market share of 41.3 percent. The five largest lenders include Huntington National Bank, Rocket Mortgage, Premier Bank, Farmers National Bank, and Hancock County Savings Bank.

Columbiana County is a largely rural area, located in the Cleveland-Pittsburgh industrial corridor, and its population declined from 105,987 persons according to 2015 ACS data, to 101,877 persons according to 2020 U.S. Census data. The two largest cities in the AA are Salem and East Liverpool. Prominent industries include manufacturing, health care and social assistance, and retail trade. Major employers include Salem Community Hospital., Fresh Mark, Inc., and East Liverpool City Hospital. As of December 31, 2021, the unemployment rate in the county was 3.9 percent, which is near the state unemployment rate of 3.6 percent.

As part of this performance evaluation, we conducted one community contact within the Columbiana County AA. The community organization focuses on providing social services to low- and moderate-income individuals and families. The organization noted financial education as one of the greatest needs in the AA. The organization needs include general operating support, funds for acquisition and pre-development for purchase of an elementary school for head start operations, and economic development investment in new sport complex in East Liverpool.

## Jefferson AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Consumers National Bank Jefferson AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	8.7	17.4	60.9	13.0	0.0
Population by Geography	68,053	3.3	15.1	72.1	9.5	0.0
Housing Units by Geography	32,604	3.8	15.0	71.5	9.7	0.0
Owner-Occupied Units by Geography	19,796	2.5	8.2	78.4	10.9	0.0
Occupied Rental Units by Geography	8,162	5.4	26.3	60.1	8.2	0.0
Vacant Units by Geography	4,646	6.6	24.4	61.9	7.1	0.0
Businesses by Geography	3,483	2.4	18.0	64.0	15.6	0.0
Farms by Geography	123	1.6	4.1	86.2	8.1	0.0
Family Distribution by Income Level	18,208	19.6	18.8	21.8	39.8	0.0
Household Distribution by Income Level	27,958	25.0	15.0	18.9	41.1	0.0
Median Family Income MSA - 48260 Weirton-Steubenville, WV-OH MSA		\$52,770	Median Housing Value			\$84,428
			Median Gross Rent			\$584
			Families Below Poverty Level			12.6%
<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>						

The Jefferson AA, based on 2020 U.S. Census data, there were two low-income census tracts (CTs) and four moderate-income CTs, 14 middle-income and three upper-income CTs. Four of CNB's 21 branches are located in this AA.

Banking competition within the AA is high. According to the June 30, 2021, FDIC Deposit Market Share Report, there are eight financial institutions with 20 offices serving Jefferson County. CNB is ranked 6th in terms of deposit market share in the AA, with 8.01 percent of total deposits. The top five institutions have a market share of 81.35 percent. The largest institutions include The Huntington National Bank, PNC Bank National Association, JP Morgan Chase National Association, First National Bank of Pennsylvania, and US Bank, National Association. Based on the June 30, 2021, FDIC Deposit Market Share Report, 12.44 percent of the bank's total deposits are from this AA.

Based on 2021 peer aggregate home mortgage lending data, CNB was ranked 18th of 145 lenders with a 1.16 percent market share in the AA. The top five lenders have a market share of 49.2 percent. The five largest lenders include Huntington National Bank, US Bank, National Association, Polaris Home Funding Corporation, Hancock County Savings Bank, and Rocket Mortgage.

Jefferson County is part of the Weirton-Steubenville, WV-OH MSA. The population of Jefferson County declined from 68,053 persons based on the 2015 ACS data, to 65,249 persons based on the 2020 U.S. Census data. The two largest cities in the AA are Steubenville and Toronto.

Prominent industries include health care and social assistance, educational services, and retail trade. Major employers include Trinity Health System, Walmart, and Arcelor Mittal Steel. As of December 31, 2021, the unemployment rate in the county was 4.7 percent, which exceeded state unemployment rate of 3.6 percent.

As part of this performance evaluation, we conducted one community contact within the Jefferson County AA. The community organization focuses on providing affordable housing and social services to low- and moderate-income individuals and families. The organization noted quality, affordable-housing as one of the greatest needs in the AA. The organization needs include general operating support, financial literacy volunteers, matching funds for government programs, financial assistance to purchase a vehicle, and participation on Board of Directors.

## **Scope of Evaluation in Ohio**

This analysis reflects a full-scope review of the bank's three AAs in Ohio. We completed our analysis of Carroll and Stark, Columbiana, Jefferson County AAs for the years 2019, 2020, and 2021. To develop our conclusions, we considered the number of home mortgage loans originated or purchased by CNB and small loans to businesses during the evaluation period. We gave more weight to the distribution of loans to individuals of different income levels and businesses of different sizes and the geographic distribution of small loans to business. We also considered any factors affecting the bank's ability to lend in each AA during the evaluation period. Refer to the Rating section above.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO**

### **LENDING TEST**

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

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full- and limited-scope reviews, the bank's lending performance in the state of Ohio is reasonable.

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

The bank exhibits reasonable 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.

#### **Carroll and Stark AA**

The bank's distribution of home mortgage loans among geographies of different income levels in the Carroll and Stark AA, during the evaluation period is poor. The bank did not make any home mortgage loans among low-income CTs in the AA. The percent of the AAs owner-occupied housing units in low-income geographies is 3.4 percent and the aggregate bank lending is 1.3 percent.

The bank's percentage of home mortgage loans among moderate-income CTs in the AA was 2.7 percent. This is below the 8.2 percent of the AAs owner-occupied housing units in moderate-income geographies and near the 5.0 percent of aggregate bank lending.

#### Columbiana AA

The bank's distribution of home mortgage loans among geographies of different income levels in the Columbiana AA, during the evaluation period is poor. There were no low-income CTs with this AA during the evaluation period. According to the 2015 ASC data the number of moderate-income CTs declined to three. As a result, the number of owner-occupied housing units in moderate-income CTs declined to 1,706, or 5.7 percent of the AA's total owner-occupied housing units. The bank did not make any home mortgage loans among geographies of moderate-income CTs in the AA.

#### Jefferson AA

The bank's distribution of home mortgage loans among geographies of different income levels in the Jefferson AA, during evaluation period is reasonable. The bank did not make any home mortgage loans in low-income CTs in the AA. The percent of the AAs owner-occupied housing units in low-income CTs is 2.5 percent and the level of aggregate bank lending is 0.9 percent. The bank's percentage of home mortgage loans in moderate-income CTs in the AA was 5.9 percent. This is near the 8.2 percent of the AAs owner-occupied housing units in moderate-income CTs and near the 7.2 percent of aggregate bank lending.

#### ***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.

#### Carroll and Stark AA

CNB's distribution of small loans to businesses among CTs of different income levels in the CNB Carroll and Stark AA during the evaluation period is reasonable. The bank's percentage of small loans to businesses among low-income CTs was 13.2 percent. This was significantly above both the 5.1 percent of businesses in low-income CTs and 4.6 percent aggregate bank lending level. The bank's percentage of small loans to businesses among moderate-income CTs was 2.6 percent. This is below both the 6.9 percent of businesses in moderate-income CTs and 5.5 percent aggregate bank lending level.

#### Columbiana AA

The bank's distribution of small loans to businesses among CTs of different income levels in the Columbiana AA during evaluation period is reasonable. There were no low-income CTs in the bank's AA. The bank's percentage of small loans to businesses among moderate-income CTs was 4.8 percent. This is near the 4.9 percent of businesses in moderate-income CTs and above the 2.3 percent aggregate bank lending level.

Jefferson AA

The bank's distribution of small loans to businesses among CTs of different income levels in the Jefferson AA during evaluation period is reasonable. The bank did not make any small loans to businesses among low-income CTs in the AA. The percent of the AAs owner-occupied housing units in low-income CTs is 2.4 percent and the 2.6 percent of aggregate bank lending level. The bank's percentage of small loans to businesses among geographies of moderate-income CTs was 33.3 percent. This is significantly above both the 18.0 percent of businesses in the moderate-income CTs geographies and 17.0 percent aggregate bank lending level.

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

CNB exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms 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.

Carroll and Stark AA

CNB's distribution of home mortgage loans to borrowers of different income levels during the evaluation period in the Carroll and Stark AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 7.8 percent. This is significantly below the 19.6 percent of low-income families living in the AA, but near the 8.3 percent aggregate bank lending level. The bank's percentage of home mortgage loans to moderate-income borrowers is 14.2 percent. It is near the 18.7 percent of moderate-income families living in the AA, but below the 20 percent aggregate bank lending level.

Columbiana AA

The bank's distribution of home mortgage loans to borrowers of different income levels during the evaluation period in the Columbiana AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 6.6 percent. This is significantly below the 20.8 percent of low-income families living in the AA, but near the 8.5 percent aggregate bank lending level. The bank's percentage of home mortgage loans to moderate-income borrowers is good at 18.7 percent. It is near the 19.0 percent of moderate-income families living in the AA, and the near the 20.6 percent aggregate bank lending level.

Jefferson AA

The bank's distribution of home mortgage loans to borrowers of different income levels during the evaluation period in the Jefferson AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 5.9 percent. This is significantly below the 19.6 percent of low-income families living in the AA, but above the 4.4 percent aggregate bank lending level. The bank's percentage of home mortgage loans to moderate-income borrowers was 9.5 percent. It is below the 18.8 percent of moderate-income families living in the AA, and the 17.6 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.

The distribution of small loans to businesses reflects reasonable penetration among businesses of different sizes. We considered the bank's limited opportunities for lending to businesses in the AA given the level of competition from other banks, credit unions, and non-bank financial institutions.

#### Carroll and Stark AA

CNB's distribution of small loans to businesses among businesses of different sizes in the Carroll and Stark AA during the evaluation period is reasonable. Based on our statistical sample of small loans to businesses originated from January 1, 2019, through December 31, 2021, the bank made 72.0 percent of its loans to businesses with gross annual revenues of \$1 million or less. This is comparable to the 82.4 percent of small businesses in the AA and exceeds the aggregate small loans to businesses lending level of 42.3 percent.

#### Columbiana AA

The bank's distribution of small loans to businesses among businesses of different sizes in the Columbiana AA during the evaluation period is reasonable. Based on our statistical sample of small loans to businesses originated from January 1, 2019, through December 31, 2021, CNB made 85.7 percent of its loans to businesses with gross annual revenues of \$1 million or less. This is comparable to the 80.6 percent of small businesses in the AA and exceeds the aggregate small loans to small businesses lending level of 37.2 percent.

#### Jefferson AA

The bank's distribution of small loans to businesses among businesses of different sizes in the Jefferson AA during the evaluation period is reasonable. Based on our statistical sample of small loans to businesses originated from January 1, 2019, through December 31, 2021, CNB made 57.1 percent of its loans to businesses with gross annual revenues of \$1 million or less. This is below to the 79.1 percent of small businesses in the AA and exceeds the aggregate small loans to small businesses lending level of 38.6 percent.

### **Responses to Complaints**

CNB did not receive any complaints during the evaluation period that would affect its CRA rating.

### **Conclusions for Area Receiving a Limited Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the Summit AA is consistent with the bank's overall performance under the Lending Test in the full scope areas.

### **COMMUNITY DEVELOPMENT TEST**

CNB's performance under the Community Development Test in the state of Ohio is rated Satisfactory.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope and limited-scope reviews, CNB exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, CNB made a reasonable level of CD loans which had a neutral impact on its overall lending performance in the AAs. In the Carroll and Stark AA, the bank originated eight qualifying CD loan totaling \$8.4 million. The loans were Small Business Administration (SBA) loans for community revitalization, economic development, and community services in the AA. In the Columbiana AA, the bank originated six qualifying CD loan totaling \$2.1 million. The loans were SBA loans for community services and redevelopment of an industrial site, in the AA. In the Jefferson AA, the bank originated one qualifying CD loan totaling \$1.0 million. The loan was for a community service organization in the AA.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% Of Total #	\$(000's)	% Of Total \$
Carroll and Stark AA	8	53.3	8,398	72.9
Columbiana AA	6	40.0	2,120	18.4
Jefferson AA	1	6.7	1,002	8.7
Summit AA	0	0.0	0.0	0.0
Total	15	100	11,520	100

### Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, sets forth the information and data used to evaluate the bank's level of CD investments.

During the evaluation period, CNB made a relatively low level of CD investments which had a neutral impact on its overall lending performance in the AA. The bank made two qualified investments totaling approximately \$1.2 million. CNB also made \$5,950 in donations within the AA.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% Of Total #	\$(000's)	% Of Total \$	#	\$(000's)
Carroll and Stark AA	0	0.0	4	1,157	4	66.7	1,157	99.9	0	0.0
Columbiana AA	0	0.0	1	0.5	1	16.7	0.5	<.1	0	0.0
Jefferson AA	0	0.0	1	0.1	1	16.7	0.1	<.1	0	0.0
Summit AA	0	0.0	0	0	0	0	0	0	0	0.0
Total	0	0.0		1,157.6	6	100	1,157.6	100	0	0.0

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

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

### **Extent to Which the Bank Provides Community Development Services**

CNB's branches are reasonably accessible to geographies and individuals of different income levels. Overall, systems for delivering retail banking services are adequate. The bank operates one branch in a moderate-income CT. One branch is located near low- and moderate-income CTs. The bank opened or acquired six branches during the evaluation period. All branches except two have onsite deposit-taking ATM. Only one branch does not offer drive-thru services. Branch hours, and the level of services available, do not vary in ways that inconvenience any portion of the AA, including low- and moderate-income individuals. Other alternative delivery systems include online bill pay, mobile banking, P2P payments, and text alerts.

#### Community Development Services

During the evaluation period, CNB provided a reasonable level of CD services which had a neutral impact on its overall lending performance in the AAs. Fourteen of CNB staff served on seventeen organization board positions. The organizations included affordable housing, community services, and economic development.

### **Conclusions for Area Receiving a Limited Scope Review**

Based on a limited-scope review CNB's performance under the CD Test in the Summit AA is weaker than the bank's overall performance under the CD Test in the full scope areas.

# 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 MSA(s) and non-MSA(s) 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>	Home mortgage, small business Community development loans, qualified investments, community development services	
<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>
Carroll and Stark AA	Full scope	Stark and Carroll Counties, which are part of the Canton-Massillon, OH MSA
Columbiana AA	Full scope	Columbiana County, which is not part of an MSA
Jefferson AA	Full scope	Weirton-Steubenville, WV-OH MSA
Summit	Limited scope	
<b>State</b>		
OHIO		

## Appendix B: Summary of MMSA and State Ratings

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RATINGS – Consumers National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Consumers National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Ohio	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## 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.

**Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2019-21**

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
Carroll and Stark AA	331	65,648,926.30	64.5	19,095	3.4	0.0	1.3	8.2	2.7	5.0	69.8	85.5	69.9	18.6	11.8	23.9	0.0	0.0	0.0
Columbiana A A	90	13,743,506.51	17.5	3,527	0.0	0.0	0.0	5.7	0.0	3.0	82.0	86.7	83.7	12.3	13.3	13.3	0.0	0.0	0.0
Jefferson AA	42	10,023,975.90	8.2	1,902	2.5	0.0	0.9	8.2	2.4	7.2	78.4	88.1	76.8	10.9	9.5	15.1	0.0	0.0	0.0
Summit AA	50	12,205,644.00	9.7	27,765	7.4	2.0	4.4	19.1	20.0	15.6	37.2	36.0	37.9	36.3	42.0	42.1	0.0	0.0	0.0
<b>Total</b>	<b>513</b>	<b>101,622,052.71</b>	<b>100.0</b>	<b>52,289</b>	<b>4.9</b>	<b>0.2</b>	<b>2.8</b>	<b>13.1</b>	<b>3.9</b>	<b>10.6</b>	<b>56.1</b>	<b>81.1</b>	<b>54.1</b>	<b>25.9</b>	<b>14.8</b>	<b>32.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 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 2019-21**

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
Carroll and Stark AA	331	65,648,926.30	64.5	19,095	19.6	7.9	8.3	18.7	14.2	20.0	21.9	19.3	22.8	39.8	51.7	33.6	0.0	6.9	15.3
Columbiana A A	90	13,743,506.51	17.5	3,527	20.8	6.7	8.5	19.0	18.9	20.6	21.7	22.2	22.8	38.6	43.3	34.7	0.0	8.9	13.4
Jefferson AA	42	10,023,975.90	8.2	1,902	19.6	2.4	4.4	18.8	9.5	17.6	21.8	28.6	22.9	39.8	31.0	36.0	0.0	28.6	19.1
Summit AA	50	12,205,644.00	9.7	27,765	21.9	8.0	12.5	16.7	18.0	21.1	20.7	12.0	20.3	40.6	58.0	31.7	0.0	4.0	14.4
<b>Total</b>	<b>513</b>	<b>101,622,052.71</b>	<b>100.0</b>	<b>52,289</b>	<b>20.8</b>	<b>7.2</b>	<b>10.4</b>	<b>17.8</b>	<b>15.0</b>	<b>20.5</b>	<b>21.3</b>	<b>19.9</b>	<b>21.5</b>	<b>40.1</b>	<b>49.1</b>	<b>32.7</b>	<b>0.0</b>	<b>8.8</b>	<b>14.8</b>

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			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		
	#	\$	% Of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Carroll and Stark AA	75	13,785	57.7	7,294	5.1	13.2	4.6	6.9	2.6	5.5	65.7	69.7	64.4	19.9	14.5	23.8	2.4	0.0	1.7
Columbiana AA	21	1,989	8.3	1,648	0.0	0.0	0.0	4.9	4.8	2.3	79.6	85.7	81.4	15.5	9.5	16.3	0.0	--	0.0
Jefferson AA	21	2,998	12.6	967	2.4	0.0	2.6	18.0	33.3	17.0	64.0	52.4	66.1	15.6	14.3	14.4	0.0	--	0.0
Summit AA	18	5,103	21.4	12,785	12.9	5.6	10.9	15.3	5.6	13.8	30.7	50.0	29.8	41.1	38.9	45.5	0.0	--	0.0
<b>Total</b>	<b>135</b>	<b>23,874</b>	<b>100</b>	<b>22,694</b>	<b>8.9</b>	<b>7.4</b>	<b>7.7</b>	<b>11.9</b>	<b>8.1</b>	<b>10.5</b>	<b>47.2</b>	<b>67.4</b>	<b>46.2</b>	<b>31.2</b>	<b>17.0</b>	<b>35.0</b>	<b>0.8</b>	<b>--</b>	<b>0.5</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 bank data; 2020 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		
	#	\$	% Of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Carroll and Stark AA	75	13,785	57.7	7,294	82.4	72.0	42.3	5.8	28.0	11.8	0.0	
Columbiana AA	21	1,989	8.3	1,648	80.6	85.7	37.2	6.3	14.3	13.2	0.0	
Jefferson AA	21	2,998	12.6	967	79.1	57.1	38.6	4.9	42.9	16.0	0.0	
Summit AA	18	5,103	21.4	12,785	82.8	55.6	45.9	6.3	44.4	11.0	0.0	
<b>Total</b>	<b>135</b>	<b>23,874</b>	<b>100</b>	<b>22,694</b>	<b>82.3</b>	<b>69.6</b>	<b>43.8</b>	<b>6.0</b>	<b>30.4</b>	<b>11.6</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 bank data; 2020 CRA aggregate data, "--" data not available.  
Due to rounding, totals may not equal 100.0%