



The Citizens National Bank  
of McConnellsville

*Growing. Connecting. Banking. Since 1886.*  
www.cnbmoco.com

A CNB Holdings, Inc. Bank

**Main Office**  
100 East Main Street  
P.O. Box 329  
McConnellsville, OH 43756  
740-962-4565  
Fax: 740-962-6432

401 Main Street  
P.O. Box 423  
Duncan Falls, OH 43734  
740-674-6055  
Fax: 740-674-5043



# Memorandum

**To:** Community Reinvestment Act File  
**CC:** Compliance  
**From:** Kelsey Wells, CRA Officer  
Tiffany Hesson  
**Date:** 03/20/2023  
06/02/2023 updated  
**Re:** CRA Lending Analysis

Unfortunately, in 2022, two of Citizens National Bank's main lending areas did not fall into an underserved or distressed census tract, as defined by the FFIEC. These tract codes are 9688 and 9690. There is a map attached that shows the demographic, income, population, and housing information. In the past, these tracts have been considered distressed. The change is most likely a result of Covid monies and stimulus packages that do not represent normal household income for our customers. As a precaution, Citizens National Bank recognizes these tracts as potentially distressed tracts and will continue to monitor lending.

## 9688 Summary:

Almost 13% of the population in this tract falls below the poverty line. The primary need of this area has been consumer loans (installment loans including vehicles and unsecured notes) and residential real estate loans. There are few opportunities for economic growth in this area. This tract is south of McConnellsville/Malta where little commercial development has occurred. Some of this area used to be primarily employed by Ohio Power before it was shut down. A good portion of the land still is owned by Ohio Franklin Realty (AEP) or is now part of the Jesse Owens State Park. There are some opportunities for individuals to buy land for agriculture or to build a home on, now that AEP is selling off chunks of the old Ohio Power land. CNX Resources Corporation is also selling land which would be used mostly for recreation and farming as it is not all suitable for building. Citizens National Bank has tried to accommodate those needs by lending 80% on vacant land. This is a higher loan to value than other institutions in the area.



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**9690 Summary:**

Over 21% of the individuals that live in this area fall below the poverty line. The primary needs of this tract include agriculture, consumer vehicle loans, and residential real estate. This area, like tract 9688, has little opportunities for economic growth. This area is west of McConnellsville/Malta and north east of Athens. Most of this area is rugged and hilly and not conducive to commercial development. A good portion of this area is owned by the State of Ohio and Burr Oak State Park sits on the very edge of this tract. The lodge draws in hunters and fishermen from across the country. Many individuals in this area take advantage of the poor crop land by having cattle (whether as a primary or supplementary source of income). Citizens National Bank has seen an increase in the need of agricultural lending, secured by vacant land, and has made the loan to value requirements higher than many other institutions.

Below are two charts that show the lending breakdowns of the two census tracts in the undeserved or distressed areas versus the total loans originated by Citizens National Bank over the past two years:

**2021 Distressed/Unservd Loans**

	9688	9690	Total Loans	% of Total
Agriculture	1	0	3	33%
Commercial	0	5	50	10%
Consumer	23	35	232	25%
Real Estate	16	12	131	21%

**2022 Distressed/Unservd Loans**

	9688	9690	Total Loans	% of Total
Agriculture	4	1	19	26%
Commercial	2	2	61	7%
Consumer	36	36	268	27%
Real Estate	12	14	140	19%



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**McConnellsville Branch**

100 East Main Street  
McConnellsville, OH 43756  
Phone: 1-800-733-6595 or 1-740-962-4565

**Fax:**

1-740-962-6432

**Email:**

staff@cnbmoco.com

**Office and Lobby Hours:**

Monday through Wednesday: 9:00 AM – 5:00 PM  
Thursday: 9:00 AM – 12:00 PM  
Friday: 9:00 AM – 5:00 PM  
Saturday: 9:00 AM – 12:00 PM

**Drive Thru and Walk-Up Hours:**

Monday through Thursday: 8:00 AM – 5:00 PM  
Friday: 8:00 AM – 5:30 PM  
Saturday: 8:00 AM – 12:00 PM

**Duncan Falls Branch**

401 Main Street  
Duncan Falls, OH 43734

**Fax:**

1-740-674-5043

**E-Mail:**

branch@cnbmoco.com

**Office and Lobby Hours:**

Monday through Friday: 9:00 AM – 5:00 PM  
Saturday: 9:00 AM – 12:00 PM

**Drive Thru Hours:**

Monday through Thursday: 8:00 AM – 5:00 PM  
Friday: 8:00 AM – 5:30 PM  
Saturday: 8:00 AM – 12:00 PM



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### **ATM Locations**

The Citizens National Bank of McConnellsville  
100 E Main Street  
McConnellsville, OH 43756

McConnel Foods  
3960 W Riverside Dr  
McConnellsville, OH 43756

River Valley Social  
900 W Riverside Dr  
McConnellsville, OH 43756

The Citizens National Bank of McConnellsville – Branch Location  
401 Main Street  
Duncan Falls, OH 43734

Campbells Food Market  
412 Main Street  
Duncan Falls, OH 43734

\*There are no deposit taking ATMs.



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## **Bank's Assessment Area- Community Reinvestment Act**

The Bank's community is Morgan County (9688, 9689, 9690, and 9691) and the following census tracts located in Muskingum County 9120, 9124, 9125, 9126, 9127, 9115 and 9116.

These tracts include:

- McConnellsville
- Malta
- Stockport
- Chesterhill
- Hackney
- Reinersville
- Portersville
- Pennsville
- Deavertown
- Duncan Falls
- Philo
- Chandlersville
- Gaysport



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## **Community Reinvestment Act- Service Hours**

### **Kelsey Wells- Morgan County Improvement Corporation Treasurer**

- Kelsey has served as a board member of the Morgan County Improvement Corporation since 2014 and the treasurer since 2015. The MCIC is a board of business men and women, as well as public officials that meet monthly to discuss ideas concerning economic development in Morgan County. The MCIC has assisted in bringing Miba Bearings and Miba Sinter to McConnellsville, as well as water and sewer to various parts of Morgan County. MCIC is in constant contact with the Morgan County Economic Development Office and the Ohio Department of Development (APEG) to bring jobs and business opportunities to Morgan County.

### **Kelsey Wells- The Morgan Community Fund Secretary**

- Kelsey has served as a member of the Morgan Community Fund for the last several years. The Fund's intention is to support enrichment and learning program, as well as meet the needs of many unserved children in the county. Some of the current programs include a Christmas giveaway to children who would not receive a gift and a music program that offers strings lessons to kids who could not afford an instrument or who do not have the opportunity to learn one in school. Another program that the Fund is considering is a financial education class for children in Morgan County.

### **Matt Carpenter- Rotary**

- Matt has served as a member of the Morgan County chapter of the Rotary Club for many years. The Rotary Club, especially in Morgan County, aims to meet a variety of needs of those that are unserved. They provide scholarships and even provide Christmas gifts for children that may not receive one.



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## Available Loan Products

### Residential Loans (1-4 Family)

- Variable rate loan products
  - 3/3 ARM
  - 7/3 ARM
- Construction
  - Has a 1% construction fee (Cost of the build)
  - \$100 draw fee
- Can be amortized up to 30 years
- Current origination fee of \$990
- Other fees can include: credit report, title exam, title insurance, escrow startup, wire, FedEx, title, UCC, VSI, construction, draw, prepaid insurance, appraisal, underwriting, flood determination, attorney, transfer tax, recording, and notice of commencement fees

### Home Equity Line of Credit

- Current origination fee of \$255
- Other fees can include title exam and recording charges

### Installment Loans

- New vehicles
- Used vehicles
- Classic cars
- Boats
- ATV/UTV
- Deposit/Stock secured
- Unsecured- Up to \$2,500
- Current origination fee \$270
- Other fees can include: title, VSI, GAP (optional), credit life and disability (optional), UCC, wire, and FedEx fees

### Overdraft Line of Credit (Tied to checking account)

### Commercial/Business Loans

- Rental real estate
- Commercial/Industrial
- Equipment
- Agricultural
- Commercial Line of Credit
- Other fees can include: all listed in the residential loan category



# The Citizens National Bank of McConnelsville

## Schedule of Fees and Charges

Effective August 1, 2020

Official Checks/Personal Money Orders	\$3.00 per item
NSF Fee	\$35.00 per item
Overdraft Fee	\$35.00 per item & \$7.50 per week thereafter
Stop Payment	\$30.00 per item or range
Return Deposit (Business Accounts)	\$10.00 per item
Interim Statement/Copy of Statement	\$5.00 per statement
Account Research/Balancing	\$20.00 per hour; minimum 1 hour charge
Dormant Checking Accounts	\$5.00 per month after one year inactive
Dormant Savings Accounts	\$5.00 per month after two years inactive
Statement Savings and E-Savings	\$50.00 daily minimum balance or \$5.00 per month service charge
Safe Deposit Box Rental	\$12.00-\$80.00 per year based on box size
	<i>Lost key \$25.00 per key</i>
Collection Items	\$25.00 per item
Safekeeping Fee	\$25.00 annually per item
Coin Counting	7% of total coin; \$3.00 minimum (Non-customers Only)
E-Checking	\$25.00 minimum opening deposit; Service charge free provided: <ul style="list-style-type: none"> <li>• <i>Electronic statements (e-statements) are required</i></li> <li>• <i>Minimum of 6 debit card transactions per month</i></li> <li>• <i>Direct deposit of income, including social security</i></li> <li>• <i>Otherwise, \$2.00 per month service charge.</i></li> <li>• <i>If no e-statements, account is considered a Regular Checking</i></li> </ul>
Regular Checking	\$25.00 minimum opening deposit; \$7.50 per month
Student E-Checking	\$25.00 minimum opening deposit; Service charge free provided: <ul style="list-style-type: none"> <li>• <i>Electronic statement (e-statements) are required</i></li> <li>• <i>Minimum of 6 debit card transactions per month</i></li> <li>• <i>If no longer a student, account is considered an E-Checking</i></li> <li>• <i>Otherwise, \$2.00 per month service charge.</i></li> </ul>
Senior Checking	No monthly charge; Free basic checks
Estate Account Checking	No monthly charge; First 20 checks free, then additional checks provided for \$10.00 per processing
CIMA (Money Market Account)	No monthly charge if balance is \$2,500.00 or above <i>If balance falls below \$2,500.00, \$7.50 per month and \$ .20 per debit</i>
Super NOW (Interest-Bearing Checking)	No monthly charge if balance is \$1,000.00 or above <i>If balance falls below \$1,000.00, \$7.50 per month and \$ .20 per debit</i>
Business Checking	\$7.00 per month; \$ .10 per debit; \$10.00 return deposit fee per item <i>Earnings credit of Target Fed Funds Rate less 1.00%, min 0.1% annually of average collected balance</i>
Signature Guarantee	\$25.00 (Customers only)
Wire Transfers-Outgoing	\$25.00
Wire Transfers-Incoming	\$10.00
Internet/Mobile Banking	No monthly charge
Visa Debit Card replacement	\$15.00 for lost/damaged card replacement
Excessive Use Fee (Savings/Money Market)	\$15.00 per month
Early Account closure (within 60 days)	\$25.00





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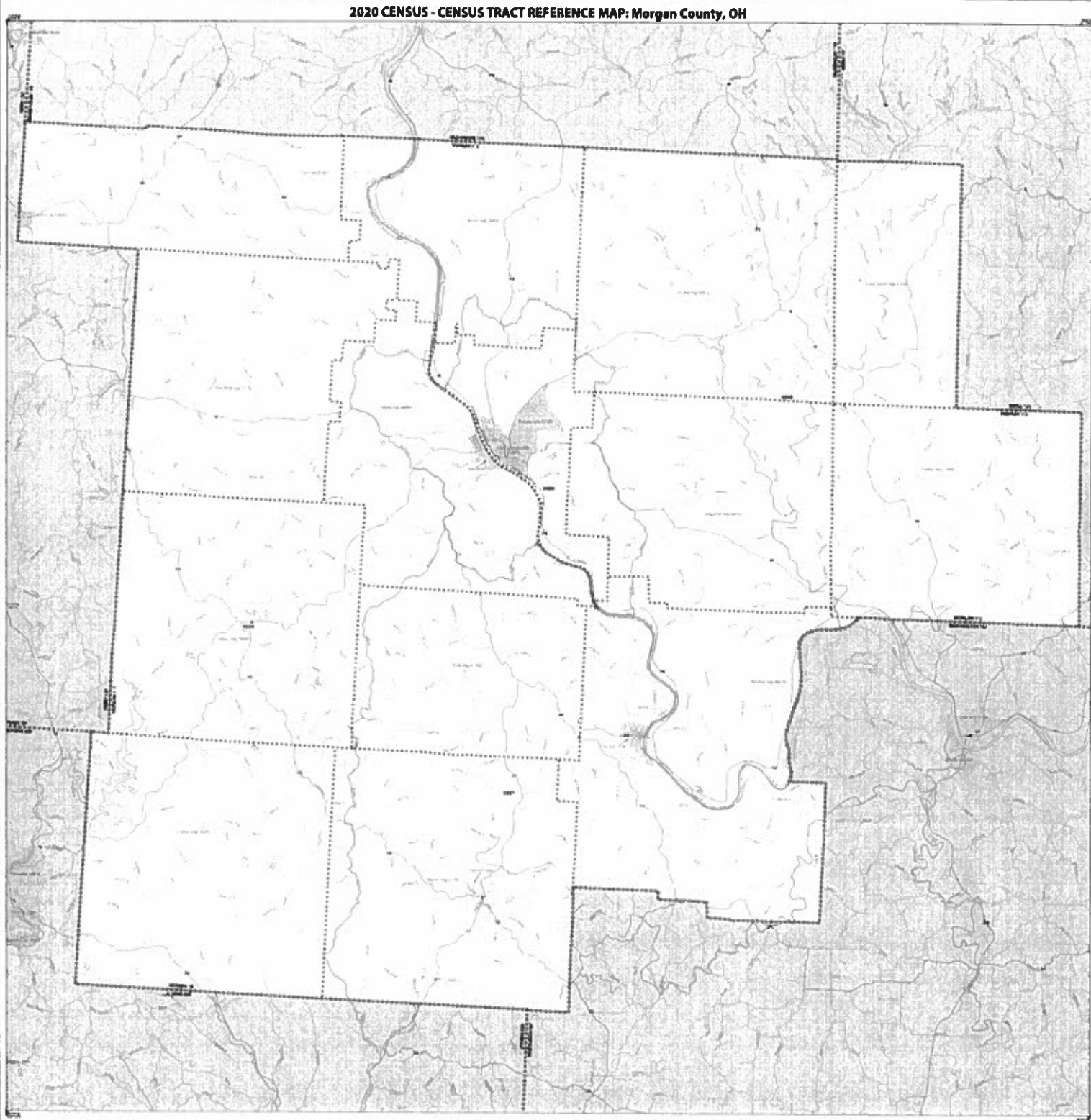


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**Loan to Deposit Ratio for 2022**

First Quarter	72%
Second Quarter	75%
Third Quarter	83%
Fourth Quarter	90%

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Morgan County, OH

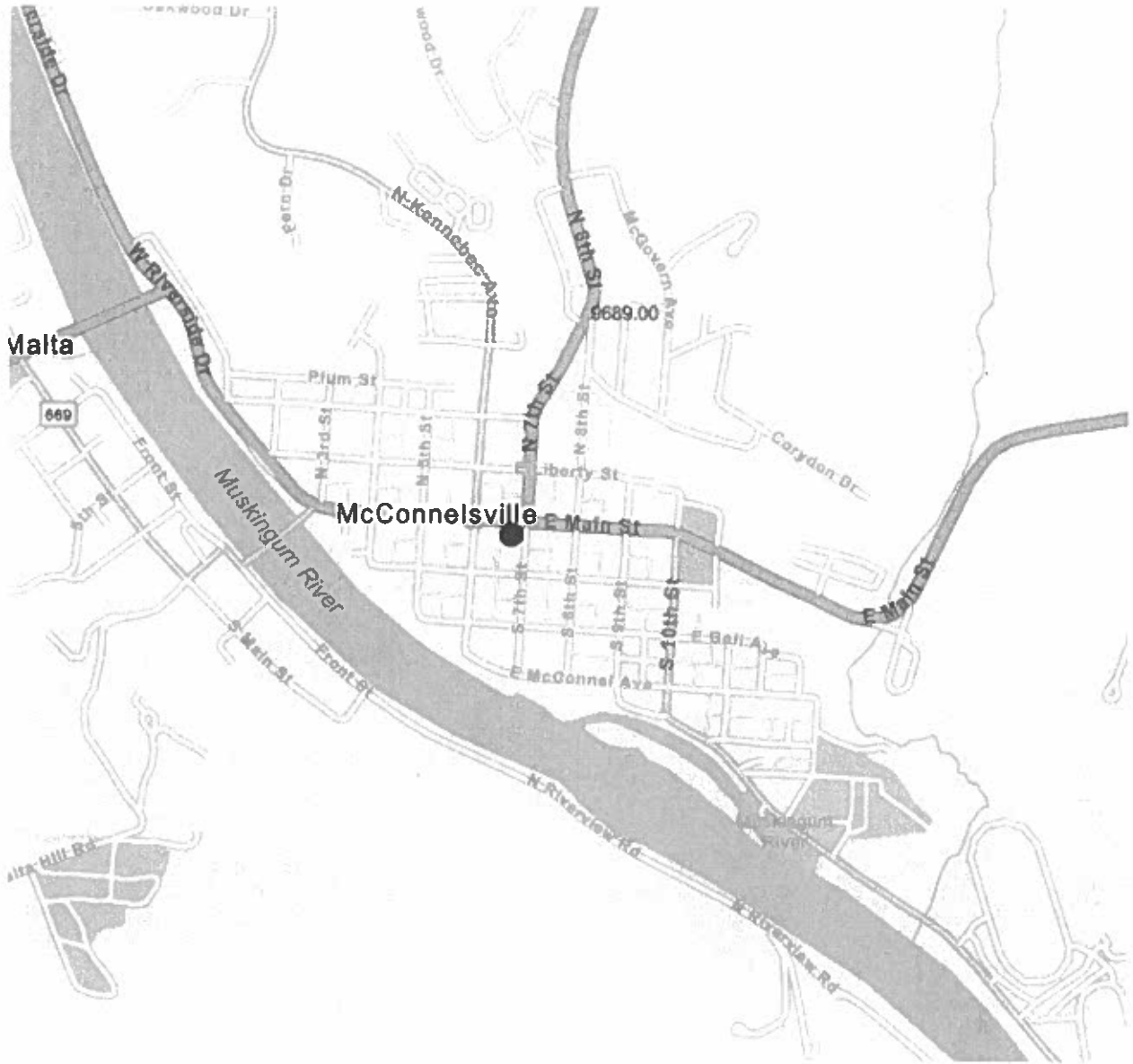


SYMBOL	DESCRIPTION	SYMBOL	DESCRIPTION	SYMBOL	DESCRIPTION
-----	County Boundary	-----	Water	-----	Interstate
-----	State Boundary	-----	Stream	-----	Major Road
-----	City Boundary	-----	Canal	-----	Minor Road
-----	Unincorporated Area	-----	Ditch	-----	Other Road
-----	Water	-----	Other Water	-----	Other Road
-----	Water	-----	Other Water	-----	Other Road
-----	Water	-----	Other Water	-----	Other Road
-----	Water	-----	Other Water	-----	Other Road
-----	Water	-----	Other Water	-----	Other Road
-----	Water	-----	Other Water	-----	Other Road

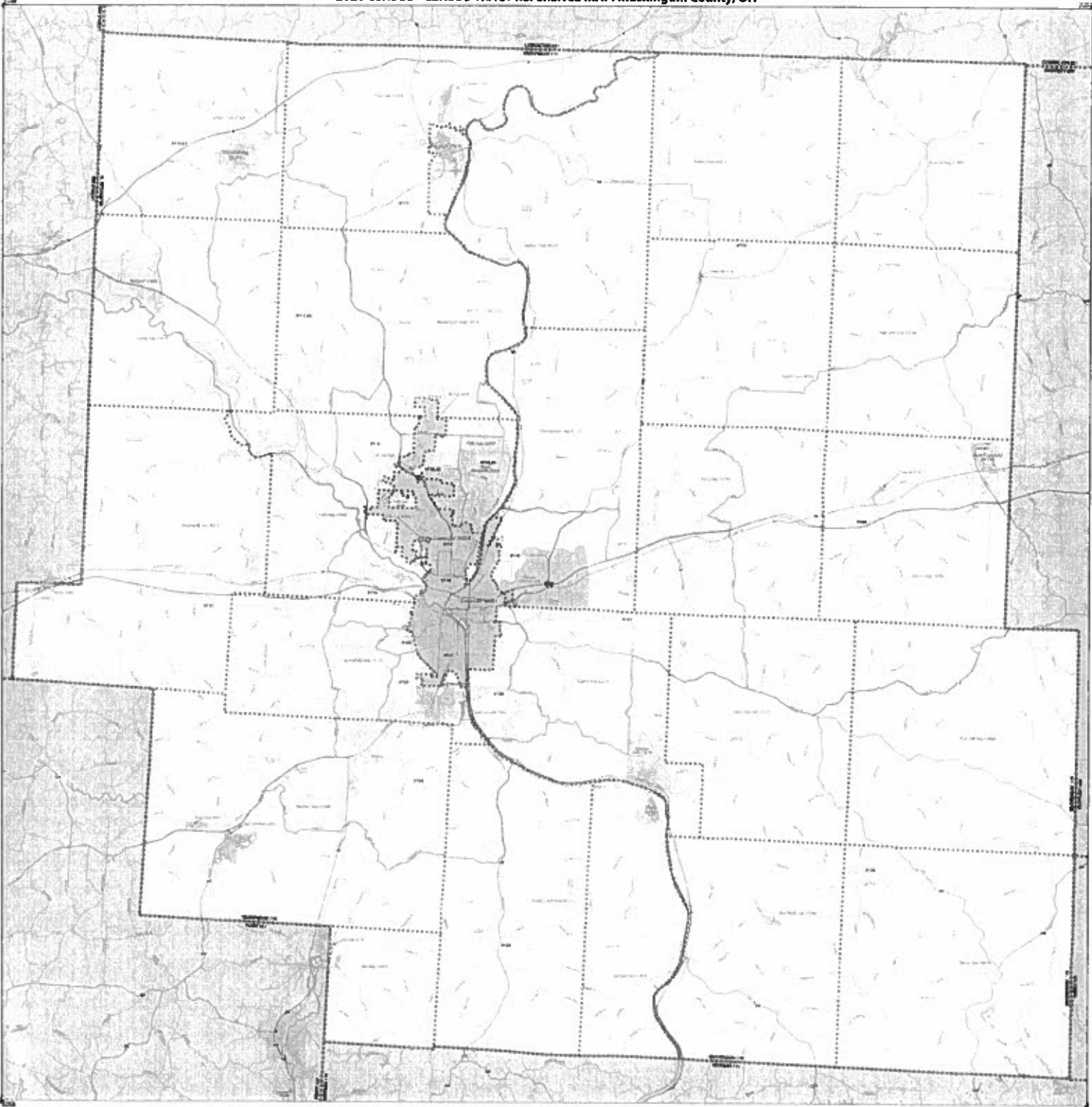
This map is a reference map for the 2020 Census. It is not a legal document. The map is based on the best available information at the time of publication. The map is subject to change without notice. The map is not to be used for any other purpose. The map is not to be used for any other purpose. The map is not to be used for any other purpose.



Sheet 1 of 3 RAINCO GROUP  
 1:000,000 Scale  
 Morgan County, OH  
 2020 Census Reference Map  
 © 2020 Rainco Group



# 2020 CENSUS - CENSUS TRACT REFERENCE MAP: Muskingum County, OH

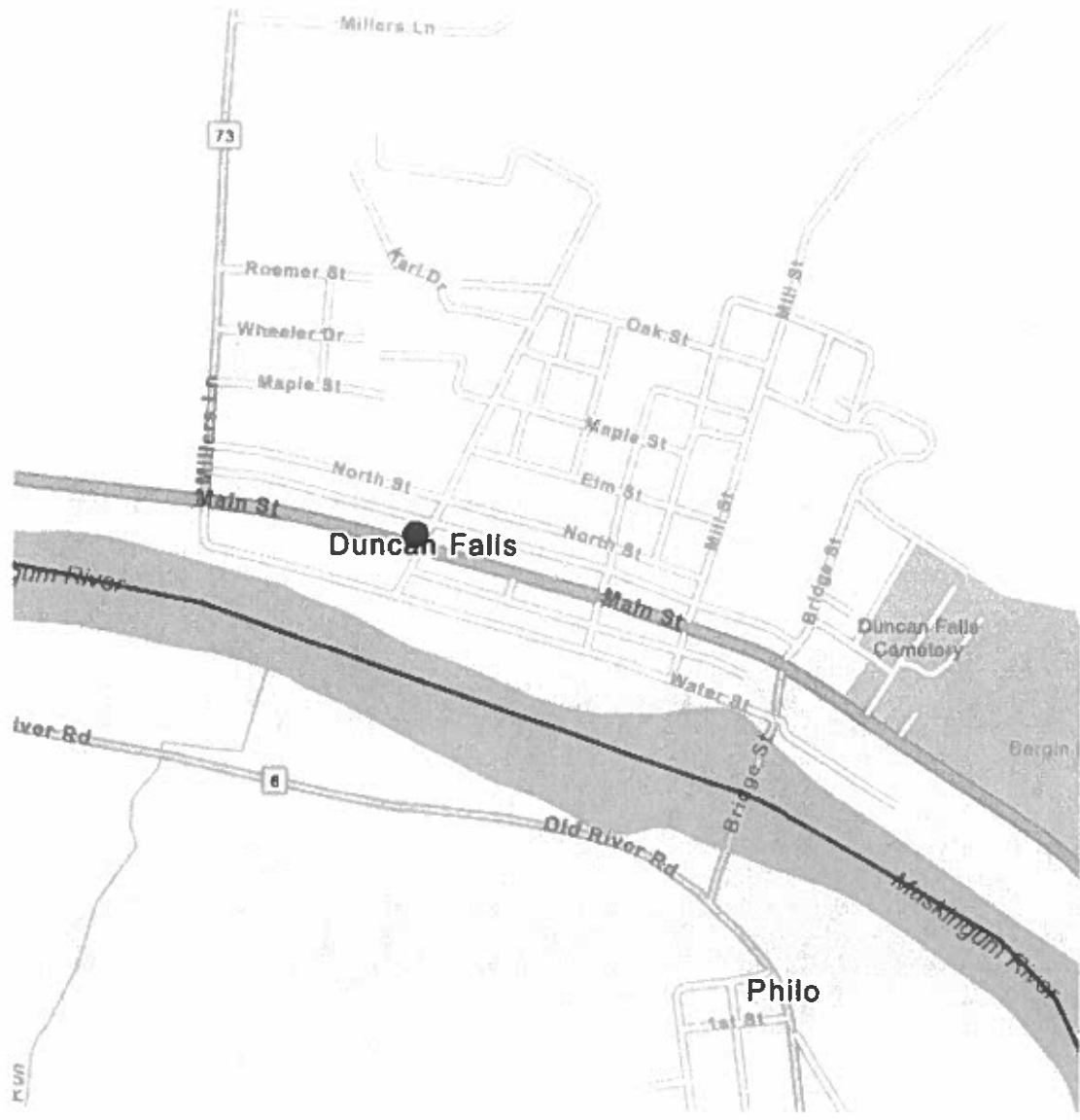


STATE	ZIP CODE	POST OFFICE	LOCALITY
OHIO	43001-43099	ADAMS	ADAMS
OHIO	43010-43019	ADAMS	ADAMS
OHIO	43020-43029	ADAMS	ADAMS
OHIO	43030-43039	ADAMS	ADAMS
OHIO	43040-43049	ADAMS	ADAMS
OHIO	43050-43059	ADAMS	ADAMS
OHIO	43060-43069	ADAMS	ADAMS
OHIO	43070-43079	ADAMS	ADAMS
OHIO	43080-43089	ADAMS	ADAMS
OHIO	43090-43099	ADAMS	ADAMS
OHIO	43100-43109	ADAMS	ADAMS
OHIO	43110-43119	ADAMS	ADAMS
OHIO	43120-43129	ADAMS	ADAMS
OHIO	43130-43139	ADAMS	ADAMS
OHIO	43140-43149	ADAMS	ADAMS
OHIO	43150-43159	ADAMS	ADAMS
OHIO	43160-43169	ADAMS	ADAMS
OHIO	43170-43179	ADAMS	ADAMS
OHIO	43180-43189	ADAMS	ADAMS
OHIO	43190-43199	ADAMS	ADAMS
OHIO	43200-43209	ADAMS	ADAMS
OHIO	43210-43219	ADAMS	ADAMS
OHIO	43220-43229	ADAMS	ADAMS
OHIO	43230-43239	ADAMS	ADAMS
OHIO	43240-43249	ADAMS	ADAMS
OHIO	43250-43259	ADAMS	ADAMS
OHIO	43260-43269	ADAMS	ADAMS
OHIO	43270-43279	ADAMS	ADAMS
OHIO	43280-43289	ADAMS	ADAMS
OHIO	43290-43299	ADAMS	ADAMS
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OHIO	43320-43329	ADAMS	ADAMS
OHIO	43330-43339	ADAMS	ADAMS
OHIO	43340-43349	ADAMS	ADAMS
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OHIO	43470-43479	ADAMS	ADAMS
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OHIO	43500-43509	ADAMS	ADAMS
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OHIO	43520-43529	ADAMS	ADAMS
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OHIO	44910-44919	ADAMS	ADAMS
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OHIO	44930-44939	ADAMS	ADAMS
OHIO	44940-44949	ADAMS	ADAMS
OHIO	44950-44959	ADAMS	ADAMS
OHIO	44960-44969	ADAMS	ADAMS
OHIO	44970-44979	ADAMS	ADAMS
OHIO	44980-44989	ADAMS	ADAMS
OHIO	44990-44999	ADAMS	ADAMS



Sheet 1 of 1 (48250) sheets  
 Total Sheets: 1 (Sheet 1 of 1)  
 MUSKINGUM COUNTY 1175  
 2020 Census Tract Reference Map  
 11/20/20





Duncan Falls

Philo

Duncan Falls Cemetery

Bergin

73

6

Run

Maskingum River

Maskingum River

Old River Rd

Old River Rd

Fair D.

Roemer St

Wheeler Dr

Maple St

North St

Oak St

Maple St

Elm St

North St

Main St

Water St

Bridge St

Bridge St

1st St

Millers Ln

Mill St

Mill St

Bridge St



## 2022 FFIEC Geocode Census Report

Address: 690 Airport Rd, Mcconnelsville, Ohio, 43756

MSA: NA - NA (Outside of MSA)

State: 39 - OHIO

County: 115 - MORGAN COUNTY

Tract Code: 9689.00

### Summary Census Demographic Information

Tract Income Level	Moderate
Underserved or Distressed Tract	No
2022 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$74,900
2022 Estimated Tract Median Family Income	\$58,916
2020 Tract Median Family Income	\$52,455
Tract Median Family Income %	78.66
Tract Population	3685
Tract Minority %	9.47
Tract Minority Population	349
Owner-Occupied Units	995
1- to 4- Family Units	1788

### Census Income Information

Tract Income Level	Moderate
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$66,684
2022 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$74,900
% below Poverty Line	14.26
Tract Median Family Income %	78.66
2020 Tract Median Family Income	\$52,455
2022 Estimated Tract Median Family Income	\$58,916
2020 Tract Median Household Income	\$39,837

### Census Population Information

Tract Population	3685
Tract Minority %	9.47
Number of Families	1027
Number of Households	1696
Non-Hispanic White Population	3336
Tract Minority Population	349
American Indian Population	4
Asian/Hawaiian/Pacific Islander Population	9
Black Population	101
Hispanic Population	37
Other/Two or More Races Population	198

### Census Housing Information

Total Housing Units	1931
1- to 4- Family Units	1788
Median House Age (Years)	61
Owner-Occupied Units	995
Renter Occupied Units	701
Owner Occupied 1- to 4- Family Units	995
Inside Principal City?	NO
Vacant Units	235



## 2022 FFIEC Geocode Census Report

Address: 6708 Rex Dr, Beverly, Ohio, 45715  
 MSA: NA - NA (Outside of MSA)  
 State: 39 - OHIO  
 County: 115 - MORGAN COUNTY  
 Tract Code: 9688.00

### Summary Census Demographic Information

Tract Income Level	Middle
Underserved or Distressed Tract	No
2022 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$74,900
2022 Estimated Tract Median Family Income	\$64,893
2020 Tract Median Family Income	\$57,778
Tract Median Family Income %	86.64
Tract Population	3028
Tract Minority %	6.41
Tract Minority Population	194
Owner-Occupied Units	1132
1- to 4- Family Units	1843

### Census Income Information

Tract Income Level	Middle
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$66,684
2022 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$74,900
% below Poverty Line	13.94
Tract Median Family Income %	86.64
2020 Tract Median Family Income	\$57,778
2022 Estimated Tract Median Family Income	\$64,893
2020 Tract Median Household Income	\$49,028

### Census Population Information

Tract Population	3028
Tract Minority %	6.41
Number of Families	980
Number of Households	1363
Non-Hispanic White Population	2834
Tract Minority Population	194
American Indian Population	3
Asian/Hawaiian/Pacific Islander Population	7
Black Population	21
Hispanic Population	22
Other/Two or More Races Population	141

### Census Housing Information

Total Housing Units	1843
1- to 4- Family Units	1843
Median House Age (Years)	45
Owner-Occupied Units	1132
Renter Occupied Units	231
Owner Occupied 1- to 4- Family Units	1132
Inside Principal City?	NO
Vacant Units	480

2022 List of Distressed or Underserved Nonmetropolitan Middle-Income Geographies

Effective June 1, 2022

COUNTY NAME	STATE NAME	Distressed Middle-Income Nonmetropolitan Tracts			Underserved Middle-Income Nonmetropolitan Tracts		STATE COUNTY CODE	TRACT CODE	TRACT CODE
		POVERTY UNEMPLOYMENT	POPULATION LOSS	REMOTE RURAL	STATE COUNTY CODE				
TRAILL	ND				X		38	097	9704.00
WALSH	ND		X				38	099	9578.00
WALSH	ND		X				38	099	9581.00
WALSH	ND		X				38	099	9582.00
WALSH	ND		X				38	099	9583.00
WELLS	ND		X			X	38	103	9598.00
WELLS	ND		X			X	38	103	9600.00
ADAMS	OH	X					39	001	7702.00
ADAMS	OH	X					39	001	7703.02
ATHENS	OH	X					39	009	9729.00
ATHENS	OH	X					39	009	9734.00
ATHENS	OH	X					39	009	9735.00
ATHENS	OH	X					39	009	9736.00
ATHENS	OH	X					39	009	9737.00
ATHENS	OH	X					39	009	9738.00
MONROE	OH					X	39	111	9666.00
MONROE	OH					X	39	111	9668.00
MONROE	OH					X	39	111	9669.00
NOBLE	OH					X	39	121	9683.00
NOBLE	OH					X	39	121	9684.01
NOBLE	OH					X	39	121	9685.00
SCIOTO	OH	X					39	145	0021.00
SCIOTO	OH	X					39	145	0023.00
SCIOTO	OH	X					39	145	0025.00
SCIOTO	OH	X					39	145	0026.00
SCIOTO	OH	X					39	145	0027.00
SCIOTO	OH	X					39	145	0028.00
SCIOTO	OH	X					39	145	0029.01
SCIOTO	OH	X					39	145	0029.02
SCIOTO	OH	X					39	145	0033.00



**PUBLIC DISCLOSURE**

April 29, 2019

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Citizens National Bank of McConnellsville  
Charter Number: 5259

100 East Main Street  
McConnellsville, Ohio 43756

Office of the Comptroller of the Currency

New York Office  
340 Madison Ave., 5th Floor  
New York, NY 10173

**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 22-quarter average loan-to-deposit ratio (LTD) is more than reasonable and commensurate with or exceeding those demonstrated by local area banks.
- The bank makes a majority of its loans within the identified assessment area (AA).
- Lending to borrowers of different income levels reflects excellent distribution.
- The Citizens National Bank of McConnelsville's (CNB or the bank) performance in lending to geographies of different income levels exhibits reasonable distribution and supports satisfactory performance.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is more than reasonable. CNB's average LTD ratio over the 22 quarters since the prior CRA examination (September 2013 – December 2018) was 76.8 percent. The bank's LTD ranged from a high of 90.7 percent in December 2017 to a low of 65.4 percent in March 2014. We compared CNB's average LTD ratio to local competitors and similar financial institutions, which included three banks with branches in the AA with total assets less than \$500 million. CNB's quarterly average LTD ratio compared favorably with the peer quarterly average LTD ratio of 72.6 percent.

## Lending in Assessment Area

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

The bank originated and purchased 72.5 percent of its total loans inside the bank's AA 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. The following table is based on the examined sample and details the bank's lending within the AA during the 2016– 2018 lending evaluation period.

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	30	75.0	10	25.0	40	2,967	54.3	2,501	45.7	5,468
Consumer	28	70.0	12	30.0	40	731	86.2	117	13.8	848
Total	58	72.5	22	27.5	80	3,698	58.5	2,618	41.5	6,316

Source: 01/01/2016 – 12/31/2018 Loan Samples

## Description of Institution

CNB is a community bank headquartered in McConnelsville, OH. The main office is located approximately 90 miles southeast of Columbus, OH. The second branch is located in Duncan Falls, OH (approximately 18 miles north of the main office); both branches have automated teller machines (ATMs) on bank premises. The bank has not opened or closed any offices since the last evaluation. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period. CNB primarily serves Morgan and Muskingum Counties. CNB is a wholly owned subsidiary of CNB Holdings, Inc., a one-bank holding company. There are two affiliates under this holding company, CNB Morgan Real Property and CNB Morgan Jefferson Development Company. Both of these entities are engaged in owning real estate in the local market.

As of December 31, 2018, CNB reported total assets of \$93.5 million, with net loans of \$63.5 million, and tier 1 capital of \$10.9 million. Net loans represent 68 percent of CNB's total assets. Residential Real Estate (RRE or home mortgage) loans total \$45.9 million or approximately 71.5 percent of total loans. Consumer loans total \$5.8 million or approximately 9 percent of total loans. Commercial loans total \$7.6 million or approximately 11.9 percent of total loans. Other loans total \$4.9 million or approximately 7.7 percent of total loans. The bank's loan originations and purchases, based on number of loans originated

and purchased, during the evaluation period are 61.4 percent consumer, 26.1 percent home mortgage, 11.4 percent commercial/commercial real estate, and 1.1 percent agriculture loans. CNB's primary business focus is residential real estate by dollar volume and consumer lending by the number of loans made.

CNB has one AA in the state of Ohio located in a non-Metropolitan Statistical Area (non-MSA) that includes Morgan and Muskingum Counties (CNB AA). The CNB AA consists of all four census tracts (CT) in Morgan County and five CTs in the southern half of Muskingum County. The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- or moderate-income areas.

No legal or financial impediments exist that could restrict CNB's ability to meet the credit needs of its AA. CNB received an Outstanding CRA rating at the previous CRA examination, as of August 12, 2013.

## **Scope of the Evaluation**

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

We conducted a full-scope CRA evaluation to assess the bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas. We used the small bank CRA evaluation procedures to assess CNB's performance. As discussed in the "Description of Institution" section, home mortgage and consumer loans are the bank's primary lending products, by dollar volume and number of loans made, and were evaluated under the Lending Test. The Lending Test includes a random sample of home mortgage loans and consumer loans that were originated or purchased each year during the lending evaluation period (January 1, 2016, to December 31, 2018). For analysis purposes, we used the 2010 U.S. Census data for loans originated and purchased in 2016 and the 2015 American Community Survey (ACS) U.S. Census data for loans originated and purchased in 2017-2018.

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

We completed a full-scope review of the non-MSA CNB AA. Refer to the tables in appendices A, B, C and D for additional information.

### **Ratings**

The bank's overall rating is based on the State of Ohio rating, as CNB only operates in the State of Ohio. The state rating is based on the full-scope review of the bank's non-MSA CNB AA. During the evaluation period, the bank's highest volume product offering by number of loans is consumer loans, and its largest product by dollar volume is home mortgage loans. Therefore, the bank's rating considers consumer loans and home mortgage loans as primary products in the bank's AA within the state of Ohio.

## **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 bank has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank'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**

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

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

### **Description of Institution's Operations in Ohio**

CNB has designated one AA in a non-MSA (the CNB AA). The CNB AA includes four CTs in Morgan County and five CTs in the southern half of Muskingum County, which consists of no low-income, four (44.4 percent) moderate-income, four (44.4 percent) middle-income, and one (11.1 percent) upper-income CTs. As of 2016, the bank had four distressed non-MSA middle-income CTs, one in Morgan County (9688) and three in Muskingum County (9124, 9125, and 9127). As of 2017-2018, the bank has two distressed non-MSA middle-income CTs, both in Morgan County (9688 and 9690).

The underlying demographics changed in 2015 due to the American Community Survey (ACS). The 2015 ACS Census data resulted in changes to the CT classifications for several moderate-income CTs. Among the CT classification changes, we noted that CT 9690 in Morgan County changed from a moderate-income CT in 2016 to a distressed non-MSA middle-income CT in 2017-2018. In Muskingum County, CT 9125 changed from a distressed non-MSA middle-income CT in 2016 to a moderate-income CT in 2017-2018.

Competition for loans and deposits in the CNB AA continues to be strong due to the presence of other community banks and branches of larger financial institutions in the area. Competition is comprised of national banks, state banks, and branches of larger financial institutions. According to the June 30, 2018 Federal Deposit Insurance Corporation market share report, CNB holds 4.4 percent or \$71.6 million of total deposits in the market area, ranking eighth out of 11 institutions. Major competitors include the

Park National Bank, Community Bank, Huntington National Bank, North Valley Bank, PNC Bank, JP Morgan Chase Bank, and the First National Bank of McConnelsville.

The economic conditions of this non-MSA AA are fair. Unemployment rates exceed those of the state of Ohio. According to the U.S. Bureau of Labor Statistics, as of February 2019, Morgan and Muskingum counties had unemployment rates of 8.5 and 6.2 percent respectively. The state of Ohio had a statewide unemployment rate of 4.7 percent as of February 2019.

The CNB AA has a reasonable mix of small companies across several industries. The largest industries inside the CNB AA are Health Care and Social Assistance, Agriculture, and Retail Trade. Major employers in Morgan and Muskingum Counties include Genesis Healthcare System, Halliburton, Miba Bearings LLC, and Dollar General.

According to the 2010 U.S. Census data, the median housing value in the CNB AA was \$100,217. Based on the 2016 median family income of \$55,400, low-income families make less than \$27,700, and moderate-income families make less than \$44,320. Overall, median housing values are approximately 2.3 to 3.6 times the annual income of low- and moderate-income families. The housing costs relative to income may have a limiting effect on mortgage demand among moderate-income families. The CNB AA includes 16,742 housing units, of which 66.6 percent are owner-occupied and 17.5 percent are rental occupied units. Approximately 14 percent of families and 18 percent of households are below the poverty level.

According to the 2015 ACS U.S. Census data, the median housing value in the CNB AA was \$96,602. Based on the 2017 median family income of \$57,600, low-income families make less than \$28,800 and moderate-income families make less than \$46,080. Overall, median housing values are approximately 2.1 to 3.4 times the annual income of low- and moderate-income families. Based on the 2018 median family income of \$61,400, low-income families make less than \$30,700 and moderate-income families make less than \$49,120. Overall, median housing values are approximately 2 to 3.2 times the annual income of low- and moderate-income families. The housing costs relative to income may have a limiting effect on mortgage demand among low- and moderate-income families. The CNB AA includes 16,845 housing units, of which 63.9 percent are owner-occupied and 20.7 percent are rental occupied units. Approximately 16.4 percent of families and 19 percent of households are below the poverty level.

We conducted interviews with representatives from local community organizations as part of this CRA evaluation. The community contacts stated that there are opportunities for participation by local financial institutions particularly in start-up funding and small business lending. They reported reasonable levels of involvement by the local financial institutions. There are many opportunities for involvement in the community, and local banks generally are willing to support local credit needs, but may have some difficulty taking on additional risk related to entrepreneurial investments.

CNB AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: CNB McConnelsville 2016</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)	9	0.0	44.4	44.4	11.1	0.0
Population by Geography	36,174	0.0	41.2	49.6	9.2	0.0
Housing Units by Geography	16,742	0.0	44.5	47.1	8.5	0.0
Owner-Occupied Units by Geography	11,149	0.0	39.4	51.6	9.0	0.0
Occupied Rental Units by Geography	2,923	0.0	52.6	41.5	5.9	0.0
Vacant Units by Geography	2,670	0.0	56.7	34.1	9.2	0.0
Businesses by Geography	1,749	0.0	44.9	45.5	9.7	0.0
Farms by Geography	162	0.0	44.4	38.3	17.3	0.0
Family Distribution by Income Level	10,158	24.4	20.8	22.5	32.3	0.0
Household Distribution by Income Level	14,072	27.2	18.7	18.4	35.7	0.0
Median Family Income Non-MSAs - OH		\$52,573	Median Housing Value			\$100,217
			Median Gross Rent			\$534
			Families Below Poverty Level			14.0%

*Source: 2010 U.S. Census and 2016 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*

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: CNB McConnelsville 2017-2018</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)	9	0.0	44.4	44.4	11.1	0.0
Population by Geography	35,986	0.0	42.1	42.3	15.7	0.0
Housing Units by Geography	16,845	0.0	43.7	42.8	13.4	0.0
Owner-Occupied Units by Geography	10,767	0.0	37.4	46.7	15.9	0.0
Occupied Rental Units by Geography	3,494	0.0	53.6	32.7	13.8	0.0
Vacant Units by Geography	2,584	0.0	56.5	40.6	2.9	0.0
Businesses by Geography	1,633	0.0	42.3	39.7	18.1	0.0
Farms by Geography	175	0.0	36.0	54.3	9.7	0.0
Family Distribution by Income Level	10,230	26.4	19.1	20.0	34.5	0.0
Household Distribution by Income Level	14,261	26.5	17.8	16.8	39.0	0.0
Median Family Income Non-MSAs - OH		\$56,217	Median Housing Value			\$96,602
			Median Gross Rent			\$617
			Families Below Poverty Level			16.4%

*Source: 2015 ACS Census and 2018 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**

We conducted a full-scope review of the CNB AA to assess the bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas. Refer to the Scope of the Evaluation section above for more details.

## **LENDING TEST**

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

Based on a full-scope review, the bank's 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 its AA.

There are no low-income CTs in the bank's AA. As of the 2010 U.S. Census data and the 2015 ACS U.S. Census data, the bank had four moderate-income CTs in the AA. The majority of the AA is moderate- and middle-income CTs. The lending analysis reflected lending in most areas, with no conspicuous gaps in lending.

### ***Home Mortgage Loans***

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

The bank's geographic distribution of home mortgage lending reflects reasonable distribution overall.

CNB's lending in the four moderate-income CTs in 2016 reflected poor distribution. Our sample of 20 loans did not capture any lending to moderate-income tracts in 2016, falling significantly below the percentage of home mortgage loans of other home mortgage lenders (aggregate data). However, we recognize that all nine loans in our sample that were originated in middle-income CTs (45 percent) were in distressed non-MSA middle-income CTs.

CNB's lending in 2017-2018 significantly exceeds both demographic and aggregate data, representing excellent performance. We noted that CT 9125 in Muskingum County changed from a distressed non-MSA middle-income CT in 2016 to a moderate-income CT in 2017-2018. The bank originated ten loans in our 2017-2018 loan sample in this CT. The distressed economic conditions and high number of rental properties may limit the bank's opportunity to lend in low- and moderate-income geographies. The bank originated a total of 339 home mortgage loans during the lending evaluation period. We sampled 20 loans in 2016 and 20 loans in 2017-2018, representing only 11.8 percent of total loan originations.

### ***Consumer Loans***

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

The bank's geographic distribution of consumer lending is reasonable overall.

CNB's lending in 2016 reflected reasonable distribution. Our sample size of 20 loans did not capture any lending in moderate-income tracts. However, we recognize that all ten loans originated in middle-income CTs were in distressed non-MSA middle-income CTs. The distressed economic conditions may limit lending opportunities in moderate-income geographies.

In 2017-2018, CNB's lending exceeded demographic data reflecting excellent distribution. The bank originated a total of 799 consumer loans during the lending evaluation period. We sampled 20 loans in 2016 and 20 loans in 2017-2018, representing only 5 percent of total loan originations.

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

The bank exhibits an excellent distribution of loans to individuals of different income levels, 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.

The bank's home mortgage lending to low- and moderate-income borrowers in 2016 is excellent overall. CNB's lending to low-income borrowers is reasonable, as lending was slightly below aggregate data. CNB's lending to moderate-income borrowers is excellent as it is well above aggregate data.

The bank's home mortgage lending to low- and moderate-income borrowers in 2017 and 2018 is excellent, as it is well above aggregate data.

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

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

The bank's consumer lending to low- and moderate-income borrowers in 2016 is reasonable overall. CNB's lending to low-income borrowers is poor, as it is significantly below demographic peer data. We noted that the 18 percent poverty rate for households in the area may limit lending opportunities, as residents of limited income may encounter difficulty meeting credit underwriting standards. CNB's lending to moderate-income borrowers is excellent as it is above demographic data.

The bank's consumer lending to low- and moderate-income borrowers in 2017 and 2018 is reasonable. CNB's lending to low-income borrowers is reasonable, as lending was commensurate with demographic data given 19 percent of households lived below the poverty line in 2018. CNB's lending to moderate-income borrowers is excellent as it is above demographic data.

### **Responses to Complaints**

There were no complaints related to the bank's CRA performance 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>	(01/01/2016 – 12/31/2018)	
<b>Bank Products Reviewed:</b>	Residential real estate (home mortgage) and consumer loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<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>
State of Ohio		
Ohio CNB AA non-MSA	Full-scope	The AA includes all CTs in Morgan County, as well as the southern half of Muskingum County

## Appendix B: Summary of Ratings

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<b>RATINGS The Citizens National Bank of McConnellsville</b>	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
<b>The Citizens National Bank of McConnellsville</b>	<b>Satisfactory</b>

## Appendix C: Definitions and Common Abbreviations

---

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

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

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

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

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

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

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

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

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

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 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 (MSA):** 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 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.

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016**

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	% 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
CNB AA 2016	20	2,193	100.0	0.0	0.0	0.0	39.4	0.0	31.9	51.6	45.0	59.2	9.0	55.0	9.0	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>2,193</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>39.4</b>	<b>0.0</b>	<b>31.9</b>	<b>51.6</b>	<b>45.0</b>	<b>59.2</b>	<b>9.0</b>	<b>55.0</b>	<b>9.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2010 U.S. Census: 01/01/2016 - 12/31/2016 Bank Data. 2016 HMDA Aggregate Data. "-" data not available.  
Due to rounding, totals may not equal 100.0

\*Bank data based on a sample of 20 loans

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18**

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	% 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
CNB AA 2017-2018	20	1,601	100.0	0.0	0.0	0.0	37.4	55.0	34.9	46.7	45.0	45.0	15.9	0.0	20.1	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>1,601</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>37.4</b>	<b>55.0</b>	<b>34.9</b>	<b>46.7</b>	<b>45.0</b>	<b>45.0</b>	<b>15.9</b>	<b>0.0</b>	<b>20.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census: 01/01/2017 - 12/31/2018 Bank Data. 2017 HMDA Aggregate Data. "-" data not available.  
Due to rounding, totals may not equal 100.0

\*Bank data based on a sample of 20 loans

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016**

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
CNB AA 2016	20	2,193	100.0	24.4	5.0	5.8	20.8	30.0	20.2	22.5	10.0	25.0	32.3	55.0	32.7	0.0	--	16.2
<b>Total</b>	<b>20</b>	<b>2,193</b>	<b>100.0</b>	<b>24.4</b>	<b>5.0</b>	<b>5.8</b>	<b>20.8</b>	<b>30.0</b>	<b>20.2</b>	<b>22.5</b>	<b>10.0</b>	<b>25.0</b>	<b>32.3</b>	<b>55.0</b>	<b>32.7</b>	<b>0.0</b>	<b>--</b>	<b>16.2</b>

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data. "--" data not available  
Due to rounding, totals may not equal 100.0

\*Bank data based on a sample of 20 loans

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-2018**

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
CNB AA 2017-2018	20	1,601	100.0	26.4	10.0	6.1	19.1	20.0	17.8	20.0	35.0	24.3	34.5	35.0	33.8	0.0	--	18.1
<b>Total</b>	<b>20</b>	<b>1,601</b>	<b>100.0</b>	<b>26.4</b>	<b>10.0</b>	<b>6.1</b>	<b>19.1</b>	<b>20.0</b>	<b>17.8</b>	<b>20.0</b>	<b>35.0</b>	<b>24.3</b>	<b>34.5</b>	<b>35.0</b>	<b>33.8</b>	<b>0.0</b>	<b>--</b>	<b>18.1</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data. "--" data not available  
Due to rounding, totals may not equal 100.0

\*Bank data based on a sample of 20 loans

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2016**

Assessment Area:	Total Consumer Loans		Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$ (000)	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
CNB AA 2016	20	396	0.0	0.0	42.1	0.0	49.5	50.0	8.4	50.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>396</b>	<b>0.0</b>	<b>0.0</b>	<b>42.1</b>	<b>0.0</b>	<b>49.5</b>	<b>50.0</b>	<b>8.4</b>	<b>50.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2010 U.S. Census: 01/01/2016 - 12/31/2016 Bank Data.  
 Due to rounding, totals may not equal 100.0  
 \*Bank data based on a sample of 20 loans

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2017-18**

Assessment Area:	Total Consumer Loans		Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$ (000)	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
CNB AA 2017-2018	20	442	0.0	0.0	41.4	75.0	43.3	25.0	15.3	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>442</b>	<b>0.0</b>	<b>0.0</b>	<b>41.4</b>	<b>75.0</b>	<b>43.3</b>	<b>25.0</b>	<b>15.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census: 01/01/2017 - 12/31/2018 Bank Data  
 Due to rounding, totals may not equal 100.0  
 \*Bank data based on a sample of 20 loans

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2016**

Assessment Area:	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$ (000)	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
CNB AA 2016	20	396	27.2	10.0	18.7	25.0	18.4	35.0	35.7	30.0	0.0	--
<b>Total</b>	<b>20</b>	<b>396</b>	<b>27.2</b>	<b>10.0</b>	<b>18.7</b>	<b>25.0</b>	<b>18.4</b>	<b>35.0</b>	<b>35.7</b>	<b>30.0</b>	<b>0.0</b>	<b>--</b>

Source: 2010 U.S. Census: 01/01 2016 - 12/31 2016 Bank Data.  
Due to rounding, totals may not equal 100.0

\*Bank data based on a sample of 20 loans

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-2018**

Assessment Area:	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
CNB AA 2017-2018	20	442	26.5	25.0	17.8	30.0	16.8	30.0	39.0	15.0	0.0	--
<b>Total</b>	<b>20</b>	<b>442</b>	<b>26.5</b>	<b>25.0</b>	<b>17.8</b>	<b>30.0</b>	<b>16.8</b>	<b>30.0</b>	<b>39.0</b>	<b>15.0</b>	<b>0.0</b>	<b>--</b>

Source: 2015 ACS Census: 01/01 2017 - 12/31 2017 Bank Data  
Due to rounding, totals may not equal 100.0

\*Bank data based on a sample of 20 loans