Office of the
Comptroller of the Currency
Washington, DC 20219

SMALL BANK

PUBLIC DISCLOSURE

January 30, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Pandora
Charter Number 11343

102 East Main Street
Pandora, OH 45877

Office of the Comptroller of the Currency

Westlake Center
4555 Lake Forest Drive, Suite 520
Blue Ash, OH 45242-3760

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

The Institution is rated Satisfactory.

- The bank's average loan-to-deposit ratio is reasonable.
- The bank is responsive to the credit needs of its community as a substantial majority of loans were made within the bank's assessment area (AA).
- Lending to borrowers of different income levels and businesses of different sizes reflects a reasonable distribution and satisfactory performance.
- The bank's lending in geographies of different income levels demonstrates a reasonable distribution.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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**.**

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

Description of Institution

The First National Bank of Pandora (FNB or the bank) is a wholly owned subsidiary of a one-bank holding company, Pandora Bancshares, Inc. Both FNB and its holding company are headquartered in the village of Pandora, Ohio. Pandora is located in Putnam County in northwest Ohio, approximately 110 miles northwest of Columbus, Ohio. Besides its main office in Pandora, FNB has four branches. One branch is in Bluffton, Ohio (Allen County), located eight miles southeast of Pandora, two are the Findlay East and Findlay West branches in Findlay, Ohio (Hancock County) which is approximately 20 miles northeast of Pandora. The other branch is in Ottawa, Ohio in Putnam County, approximately 9 miles northwest of Pandora. FNB offers retail, commercial and agricultural banking products and services in all of these full-service locations.

FNB's primary business focus is residential real estate and commercial lending with some agricultural and consumer lending as well. No legal or financial impediments exist that could restrict FNB's ability to meet the credit needs of its assessment area. FNB received a "Satisfactory" rating at its previous CRA evaluation dated March 17, 2014.

As of September 30, 2018, FNB reported total assets of $169.3 million, with net loans of $115.2 million and Tier 1 Capital of $15.1 million. Residential Real Estate loans total $37.6 million or approximately 37% of total loans. Home Equity Lines of Credit total $11.2 million, or approximately 11% of total loans. Commercial Loans total $33.8 million or approximately 33% of total loans. Agriculture loans total $15.2 million or approximately 15% of total loans. Consumer loans total $5.1 million or approximately 5% of total loans.

FNB has one assessment area (AA), located in a non-Metropolitan Statistical Area (non-MSA) together with two census tracts located within the Lima, Ohio MSA #30620 (MSA). The bank does a low level of lending in these two census tracts. Additionally, these census tracts do not extend substantially beyond the non-MSA boundary of Putnam County. Therefore, they were included in the non-MSA AA. The 2015 ACS U.S. Census Areas of the AA contains zero low-income Census Tracts (CT), two (9.1 percent) moderate-income CTs, seven (31.8 percent) middle-income CTs, and 13 (59.1 percent) upper-income CTs. Refer to "Appendix B: Community Profiles for Full-scope Areas" for specific details regarding the AA. The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- or moderate-income areas. Bank management selected this AA based on the bank's targeted lending territory and office locations.

Discussions with community contacts in Putnam County, OH indicate that community credit and banking needs, especially for low- and moderate-income borrowers and areas, are being met. Primary credit needs include residential real estate lending and loans to small businesses. The community contact stated that local banks have been generous with their assistance for all types of community programs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC conducted a Community Reinvestment Act (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 small bank evaluation procedures to evaluate the bank's performance.

Our review focused on the bank's primary lending products, which are business (commercial and commercial real estate) and residential real estate loans, as determined through discussions with management and the volume of loan originations during the evaluation period (January 1, 2015 to December 31, 2017).

To perform our evaluation we sampled 40 business loans originated during the evaluation period and used all of the originated residential real estate loans reported under the Home Mortgage Disclosure Act (HMDA) on the loan application register (LAR) from January 1, 2015 through December 31, 2017. To perform the borrower and geographic distribution analyses for business loans, we removed any loans in the original 40-loan sample that were made outside the AA and selected additional loans located inside the AA to ensure we used at least 40 business loans in our analysis. We used only the reported residential real estate loans made in the AA to perform the borrower and geographic distribution analyses for home loans. We used the 2010 U.S. Census and 2015 American Community Survey (ACS) U.S. Census data for our review.

Data Integrity

A data integrity examination was conducted on the bank's filed HMDA data and completed in November 2018. The examination concluded that the bank's HMDA data was reliable with an insignificant error rate. Therefore, for our review of Residential Real Estate loans, we relied on the data filed in the bank's HMDA LAR. For our review of Commercial loans, we reviewed material from the bank's lending files while onsite at the bank. We geocoded the locations and reviewed the customer's gross revenues/sales. We determined that this documentation was also reliable.

Selection of Areas for Full-Scope Review

We completed a full-scope review of the bank's only AA, the Non-MSA AA described within the Description of Institution section of this report.

Ratings

The bank's overall rating is based on the review of the Non-MSA AA.

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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

Based on the criteria for the CRA lending test, the bank's lending performance is satisfactory.

Loan-to-Deposit Ratio

The loan-to-deposit ratio is reasonable given the bank's size, financial condition, and AA credit needs and meets the requirements for satisfactory performance. The bank's average LTD ratio over the 22 quarters since the prior CRA examination (June 2013 – September 2018) was 77.9 percent. The bank's LTD ratio ranged from a high of 82.27 percent at June 30, 2015 to a low of 72.80 percent as of December 31, 2014. The bank's LTD ratio increased since the prior exam to the peak of 82.27 percent in June 2015 and then declined to around 77 percent, which it has generally stayed near since. FNB compares satisfactorily to the peer banks, which averaged an 85.64 percent LTD ratio over the same evaluation period.

Lending in Assessment Area

Table D - Lending Inside and Outside of the Assessment Area

Loan Category	Number of Loans				Total	Dollar Amount of Loans $(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	$	%	$	%	$(000s)
Home Mortgage										
2015	107	81.7	24	18.3	131	12,846	83.1	2,616	16.9	15,462
2016	119	85.0	21	15.0	140	16,890	86.7	2,596	13.3	19,486
2017	83	84.7	15	15.3	98	11,339	83.9	2,171	16.1	13,510
Commercial	36	90.0	4	10.0	40	2,087	94.0	131	6.0	2,218
Total	**345**	**85.3**	**64**	**14.7**	**409**	**43,162**	**85.2**	**7,514**	**14.8**	**50,676**

Source: Evaluation Period: 1/1/2015 - 12/31/2017 HMDA Data and CRA Commercial Loan sample
Due to rounding, totals may not equal 100.0

The bank's record of lending within its AA is outstanding with a substantial majority of loans made inside the AA. We evaluated the bank's home mortgage loans reported from the HMDA LAR and commercial loans reviewed in our CRA sample taken on site. During the evaluation period, FNB originated 85.3 percent of loans by number or 85.2 percent of loans by dollar amount inside its AA. Refer to Table D for the number and dollar volume of loans originated by type inside the AA.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Lending to borrowers of different incomes reflects reasonable distribution.

FNB's lending to low- and moderate-income borrowers in the AA in 2015 – 2017 is above or commensurate with aggregate peer data, reflecting excellent distribution of lending among borrowers of different income levels.

Refer to the data in Table P in Appendix C and the community profiles in Appendix B for the facts and data used to evaluate the borrower distribution of the bank's loan originations.

Business Loans

FNB's lending to business of different sizes reflects reasonable distribution in 2015 – 2017.

In 2015 - 2016, the distribution of business loans reflected excellent distribution to businesses of different sizes. The percent of small business loans originated in 2015 – 2016 by FNB exceeded the aggregate peer amount of small business loans made in the assessment area. The proportion of lending to small businesses mirrored the percentage of small businesses in the AA.

In 2017, the distribution of business loans reflected reasonable distribution to businesses of different sizes. The percent of small business loans originated in 2017 by FNB were above the aggregate peer amount of small business loans made in the assessment area. The proportion of lending to small businesses was below the percentage of small businesses in the AA.

Refer to Tables R in appendix C for the facts and data used to evaluate the borrower distribution of the banks small loans to business originations and purchases.

Geographic Distribution of Loans

FNB's geographic distribution of loans reflects reasonable distribution.

The AA consists of no low-income CTs and two moderate-income CTs. The lending analysis reflected lending in most areas, with no conspicuous gaps in lending.

The bank's geographic distribution of lending in 2015 – 2016 and 2017 in low- and moderate-income CTs is reasonable, but falls below the aggregate peer data.

Refer to the data in Table O in Appendix C and the community profiles in Appendix B for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

Business Loans

The geographic distribution of business loans reflects reasonable distribution of small business loans in moderate-income CTs. The Pandora AA does not include low-Income CTs.

In 2015 - 2016, the distribution of business loans reflected poor distribution. Pandora did not originate any small business loans in the moderate-income CT based on our sample of 20 loans. There are only two moderate-income CTs in the AA.

In 2017, the distribution of business loans reflected reasonable distribution. The percentage of lending in the moderate-income CT reflected similar percentages to the percentage of aggregate distribution and business distribution.

Refer to tables Q for Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography for 2016 and 2017.

Responses to Complaints

FNB has not received any complaints about its performance in helping to meet AA credit needs 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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/2015 – 12/31/2017) Investment and Service Tests and CD Loans: Not Applicable (NA)	
Financial Institution		**Products Reviewed**
First National Bank of Pandora (FNB) Pandora, OH		Residential Real Estate Commercial Loans
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	**Type of Exam**	**Other Information**
Non-MSA (Metropolitan Statistical Area) AA in the State of Ohio: 1. Putnam County 2. Hancock County 3. Allen County – two CTs in the Lima, OH MSA 30620	Full Scope	Non-MSA (Metropolitan Statistical Area) AA: 1) Putnam County – County Code 137 a) Pandora (Main) Branch – *Census Tract 304* b) Ottawa Branch– *Census Tract 303* 2) Hancock County – County Code 063 a) Findlay East Branch – *Census Tract 6* b) Findlay West Branch – *Census Tract 4* 3) Allen County – two Census Tracts: 101 and 102

Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area 2015 - 2016 Assessment Area: Pandora						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	22	0.0	9.1	40.9	50.0	0.0
Population by Geography	117,796	0.0	11.2	35.1	53.7	0.0
Housing Units by Geography	49,556	0.0	12.0	37.0	51.0	0.0
Owner-Occupied Units by Geography	35,018	0.0	8.0	35.4	56.6	0.0
Occupied Rental Units by Geography	11,509	0.0	21.1	41.8	37.1	0.0
Vacant Units by Geography	3,029	0.0	23.1	37.7	39.2	0.0
Businesses by Geography	6,384	0.0	14.6	33.0	52.4	0.0
Farms by Geography	785	0.0	2.0	35.4	62.5	0.0
Family Distribution by Income Level	32,314	13.5	15.2	22.6	48.7	0.0
Household Distribution by Income Level	46,527	17.4	14.4	18.4	49.8	0.0
Median Family Income MSA - 30620 Lima, OH MSA		$55,549	Median Housing Value			$130,514
Median Family Income Non-MSAs - OH		$52,573	Median Gross Rent			$622
			Families Below Poverty Level			7.2%

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.

Table A – Demographic Information of the Assessment Area 2017 Assessment Area: Pandora						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	22	0.0	9.1	31.8	59.1	0.0
Population by Geography	118,150	0.0	10.0	31.2	58.8	0.0
Housing Units by Geography	50,350	0.0	9.7	32.0	58.3	0.0
Owner-Occupied Units by Geography	35,221	0.0	5.9	32.4	61.8	0.0
Occupied Rental Units by Geography	12,035	0.0	20.8	29.9	49.3	0.0
Vacant Units by Geography	3,094	0.0	10.2	36.6	53.2	0.0
Businesses by Geography	6,429	0.0	11.3	31.6	57.1	0.0
Farms by Geography	825	0.0	1.6	37.0	61.5	0.0
Family Distribution by Income Level	32,012	13.1	14.7	21.6	50.5	0.0
Household Distribution by Income Level	47,256	17.8	15.3	17.0	49.9	0.0
Median Family Income MSA - 30620 Lima, OH MSA		$56,195	Median Housing Value			$130,805
Median Family Income Non-MSAs - OH		$56,217	Median Gross Rent			$672
			Families Below Poverty Level			7.7%

Source: 2015 ACS Census and 2017 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.

FNB has designated one assessment area (Pandora AA), which includes a non-MSA AA (Putnam and Hancock Counties) together with two CTs located within the Lima, OH MSA #30620 (two CTs in Allen County). The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas. The AA includes 22 CTs, which has remained the same since 2010 according to the 2015 ACS U.S. Census. The 2015 ACS U.S. Census Areas of the Pandora AA contains zero low-income CTs, two (9.1 percent) moderate-income CTs, seven (31.8 percent) middle-income CTs, and 13 (59.1 percent) upper-income CTs. The population was slightly up from the 2010 U.S Census while the percentage of moderate-income households have decreased.

The local economy is stable with lower unemployment rates than state levels. Ohio unemployment rates are 4.1 percent as of November 2018. The unemployment rates for the same time period for the Lima MSA in Allen County were 3.9 percent. As of November 2018, the unemployment rates for the Ohio Non-MSA are 3.0 percent for Putnam County and 3.1 percent for Hancock County. The source of the unemployment data was from the U.S. Bureau of Labor Statistics.

The Pandora AA has a reasonable mix of companies across several industries. The largest industries inside the AA are manufacturing, healthcare and social assistance, and retail trade. Major employers in the Pandora AA include Whirlpool, Cooper Tire & Rubber, Marathon Petroleum, and Blanchard Valley Regional Health Center.

According to the 2010 U.S Census data, the median housing value in the Pandora AA was $130,514. Based on the median family income in the Lima MSA of $55,549, moderate-income

families make less than $48,880 annually. Resulting in the median housing values to be approximately 2.7 times the annual income of moderate-income families in the Lima MSA. Based on the median family income in the Ohio Non-MSA of $52,573, moderate-income families make less than $44,320 annually. Resulting in the median housing values to be approximately 2.9 times the annual income of moderate-income families in the Ohio Non-MSA.

According to the 2015 ACS Census data, the median housing value in the Pandora AA was $130,805. Based on the median family income in the Lima MSA of $56,195, moderate-income families make less than $45,120 annually. Resulting in the median housing values to be approximately 2.3 times the annual income of moderate-income families in the Lima MSA. Based on the median family income in the Ohio Non-MSA of $56,217, moderate-income families make less than $46,080 annually. Resulting in the median housing values to be approximately 2.3 times the annual income of moderate-income families in the Ohio Non-MSA.

We conducted interviews with representatives from two community organizations as part of this CRA evaluation. The community contacts stated that there are many opportunities for participation by local financial institutions. They mentioned there is a need for short-term dollar loans, general operating support, grants, and low interest financing for future rehabs. Overall, local financial institutions are adequately meeting the credit and community development needs of the community.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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 MA/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 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) throughout those geographies. Because small business data is 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 Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to the percentage distribution of businesses with revenues of $1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

Table S. **Assessment Area Distribution of Loans to Farms by Income Category of the Geography** – The percentage distribution of the number of small loans (less than or equal to $500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data is 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 (less than or equal to $500,000) originated and purchased by the bank to farms with revenues of $1 million or less to the percentage distribution of farms with revenues of $1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer 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 throughout 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 MA/assessment area.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2015-16**

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
Pandora	184	24,566	100.0	3,059	0.0	0.0	0.0	8.0	3.8	6.8	35.4	28.3	34.7	56.6	67.9	58.5	0.0	0.0	0.0
Total	**184**	**24,566**	**100.0**	**3,059**	**0.0**	**0.0**	**0.0**	**8.0**	**3.8**	**6.8**	**35.4**	**28.3**	**34.7**	**56.6**	**67.9**	**58.5**	**0.0**	**0.0**	**0.0**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

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

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
Pandora	68	8,801	100.0	2,691	0.0	0.0	0.0	5.9	4.4	6.0	32.4	32.4	30.1	61.8	63.2	63.9	0.0	0.0	0.0
Total	**68**	**8,801**	**100.0**	**2,691**	**0.0**	**0.0**	**0.0**	**5.9**	**4.4**	**6.0**	**32.4**	**32.4**	**30.1**	**61.8**	**63.2**	**63.9**	**0.0**	**0.0**	**0.0**

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2015-16**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**
Pandora	184	24,566	100.0	3,059	13.5	3.8	3.9	15.2	21.7	18.6	22.6	30.4	22.1	48.7	42.4	43.2	0.0	1.6	12.1
Total	**184**	**24,566**	**100.0**	**3,059**	**13.5**	**3.8**	**3.9**	**15.2**	**21.7**	**18.6**	**22.6**	**30.4**	**22.1**	**48.7**	**42.4**	**43.2**	**0.0**	**1.6**	**12.1**

Source: 2010 U.S Census ; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

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

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**
Pandora	68	8,801	100.0	2,691	13.1	7.4	5.0	14.7	19.1	19.1	21.6	27.9	23.2	50.5	35.3	43.6	0.0	10.3	9.2
Total	**68**	**8,801**	**100.0**	**2,691**	**13.1**	**7.4**	**5.0**	**14.7**	**19.1**	**19.1**	**21.6**	**27.9**	**23.2**	**50.5**	**35.3**	**43.6**	**0.0**	**10.3**	**9.2**

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015-16**

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
Pandora	20	851	100	1,362	0.0	0.0	0.0	14.4	0.0	14.3	33.0	15	30.3	52.6	85	55.4	0.0	0.0	0.0
Total	**20**	**851**	**100**	**1,362**	**0.0**	**0.0**	**0.0**	**14.4**	**0.0**	**14.3**	**33.0**	**15**	**30.3**	**52.6**	**85**	**55.4**	**0.0**	**0.0**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017**

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
Pandora	20	2,217	100	1,201	0.0	0.0	0.0	11.3	10.0	10.3	31.6	45.0	35.1	57.1	45.0	54.6	0.0	0.0	0.0
Total	**20**	**2,217**	**100**	**1,201**	**0.0**	**0.0**	**0.0**	**11.3**	**10.0**	**10.3**	**31.6**	**45.0**	**35.1**	**57.1**	**45.0**	**54.6**	**0.0**	**0.0**	**0.0**

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

**Percentages used based on a sample of 20 small business loans.*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pandora	20	851	100	1,362	78.0	75.0	36.5	7.1	25.0	14.9	0.0
Total	**20**	**851**	**100**	**1,362**	**78.0**	**75.0**	**36.5**	**7.1**	**25.0**	**14.9**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pandora	20	2,217	100	1,201	77.6	55.0	44.8	7.4	45.0	15.0	0.0
Total	**20**	**2,217**	**100**	**1,201**	**77.6**	**55.0**	**44.8**	**7.4**	**45.0**	**15.0**	**0.0**

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0