



## **PUBLIC DISCLOSURE**

August 6, 2018

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

First National Bank of Pennsylvania  
Charter Number 249

166 Main Street  
Greenville, PA 16125

Office of the Comptroller of the Currency

400 7th Street SW  
Washington, D.C. 20219

**NOTE:** This document is an evaluation of this Bank'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 Bank. This evaluation is not, and should not be construed as, an assessment of the financial condition of this Bank. The rating assigned to this Bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial Bank.

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**Overall CRA Rating**

**Bank’s CRA Rating:** This Bank is rated **Satisfactory**.

The following table indicates the performance level of First National Bank of Pennsylvania with respect to the lending, investment, and service tests:

Performance Levels	First National Bank of Pennsylvania Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to credit needs in the bank’s assessment areas (AAs), taking into account the number and amount of home mortgages and small business loans in the AAs.
- FNB’s distribution of loans among geographies of different income levels was good, based upon good home mortgage lending and good small business lending.
- FNB’s distribution of loans to individuals and businesses of different income levels was good, based upon good home mortgage lending and good small business lending.
- The bank has made a relatively high level of community development loans.
- The bank has made a significant level of qualified community development investments and grants, which exhibits adequate responsiveness to credit and community needs.
- The bank’s branches and alternative delivery systems are reasonably accessible to essentially all portions of the AA.

## 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 metropolitan assessment area (AA).

**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 (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; 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 the Department of Housing and Urban Development (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 bank as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the 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 Banks 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 bank collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data a bank 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:** Any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A state or multistate metropolitan area. For a bank with domestic branches in only one state, the bank's CRA rating would be the state rating. If a bank maintains domestic branches in more than one state, the bank will receive a rating for each state in which those branches are located. If a bank maintains domestic branches in two or more states within a multistate metropolitan area, the bank will receive a rating for the multistate 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 thousand 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.

## Description of Bank

First National Bank of Pennsylvania (“FNB” or “bank”) is an interstate bank headquartered in Greenville, Pennsylvania (PA), and wholly owned by FNB Corporation (FNB Corp.), a one-bank holding company headquartered in Pittsburgh, PA. The bank was chartered in February 1864. FNB Corp. has several subsidiaries, including Regency Finance Company (RFC), First National Insurance Agency (FNIA), and F.N.B. Capital Corporation, LLC (FNBCC). Additionally, FNBCC has a funding commitment to F.N.B. Capital Partners, L.P. (FNBCP), and a Small Business Investment Company (SBIC) licensed by the Small Business Administration. FNBCP is not a subsidiary or affiliate of FNB.

In February 2016, FNB acquired Metro Bank, along with its 32 full-service branches located in Pennsylvania. In April 2016, FNB completed the acquisition of 17 Fifth Third Bank branch banking locations in the Pittsburgh MSA. In March 2017, FNB acquired Yadkin Bank, along with its 98 full-service branches located in North Carolina and South Carolina.

The bank currently operates 416 branch offices and 487 deposit-taking automated teller machines (ATMs) distributed across 26 AAs in six states: Maryland (MD), North Carolina (NC), Ohio (OH), Pennsylvania (PA), South Carolina (SC), and West Virginia (WV). FNB opened 25 branches and closed 27 branches during the evaluation period.

As of December 31, 2017, FNB had total assets of \$31.2 billion and tier 1 capital was over \$2.3 billion. Total net loans and leases outstanding were \$20.7 billion. The bank’s loan portfolio consisted of 31.0 percent non-farm non-residential loans, 18.0 percent commercial & industrial loans, 30.0 percent 1-4 family residential loans, 7.8 percent loans to individuals, 6.6 percent construction and development loans, and 3.8 percent in all other loans. Total deposits were \$22.6 billion.

FNB is a full-service financial institution that offers a comprehensive array of banking, trust, investment, leasing, mortgage and cash management products and services to commercial enterprises of all sizes and consumers. FNB’s primary focus is commercial and retail banking with an emphasis on small business and residential lending.

FNB competes with many national banks, state banks, and credit unions for deposit market share. The bank offers a variety of deposit products to businesses and consumers. Deposit products include checking, savings, and money market deposit accounts, certificates of deposits, and other time deposits. FNB offers additional retail services including check cashing, direct deposit, online bill payment and funds transfer, mobile banking, and telephone banking.

Consumer loan products include conventional mortgages, home equity loans, lines of credit, credit cards, personal loans, and automobile loans. Business loan products include term loans, lines of credit, Small Business Administration (SBA) loans, loans for equipment leases, and credit cards.

There were no legal or financial factors impeding the bank’s ability during the evaluation period to help meet credit needs in its AAs. FNB’s CRA performance was rated “Satisfactory” in the last public evaluation dated August 10, 2015.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

For the Lending Test, we analyzed home mortgage loans that the bank reported under the HMDA, and small loans made to businesses and small loans to farms the bank reported under the CRA. Both loan types were reviewed for the period of January 1, 2015 through December 31, 2017. Multifamily loans are not a primary loan product; therefore, we did not evaluate this product separately. However, we did consider multifamily loans meeting the CD definition as part of the evaluation of CD lending. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period.

In evaluating the geographic distribution and borrower income criteria under the Lending Test, 2015 through 2016 data was analyzed separately from 2017 data. This was due to changes between the 2015 U.S. Census American Community Survey. Performance Tables O, P, Q, R, S, and T in appendix D include data covered by the analysis period 2015-2016 and 2017.

When evaluating the bank's performance under the Lending Test, we placed greater weight on the bank's performance in 2015 through 2016. It represented the bank's most significant period for reportable loans, which is discussed in the applicable narrative sections of the evaluation. The evaluation period for CD loans, the investment test, and the service test was January 1, 2015 through December 31, 2017.

Due to the bank's acquisition activity during the examination cycle, the state ratings for North Carolina and South Carolina have an evaluation period start date of March 1, 2017 through December 31, 2017 for all CRA reportable activity.

Home mortgage loans were not a primary loan product in the state of South Carolina. Small loans to farms were not a primary loan product in the states of Maryland, North Carolina, Ohio, and South Carolina.

### Selection of Areas for Full-Scope Review

In each state and multistate metropolitan area where the bank has an office, a sample of AAs within that state and multistate metropolitan area was selected for full-scope reviews. Full-scope reviews consider quantitative and qualitative factors, as well as performance context factors. Limited-scope reviews consider quantitative factors only.

Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section (as applicable) for details regarding how the areas were selected.

### Ratings

The bank's overall rating is a blend of the state and multistate metropolitan area ratings. The state and multistate metropolitan area ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The multistate metropolitan areas and the state of Pennsylvania rating areas carried the greatest weight in our conclusions because these areas represented the bank's most significant market in terms of deposit concentration, branch distribution, and reportable loans. As of June 30, 2017, deposits in these rating areas comprised 72.6 percent of FNB's total deposits. Additionally, 67.4 percent of the bank's branches were located, and 77.4 percent of reportable loan originations were generated in these multistate metropolitan areas and the state.

For the lending test, this evaluation analyzed performance from 2015 through 2016 and 2017. We placed more emphasis on performance in 2017 for the AAs impacted by the 2015 U.S. Census American Community Survey changes to reach our performance conclusions. The 2017 time period is more reflective of the bank's current performance considering the acquisitions. When evaluating the bank's lending, we placed the most weight on home mortgage lending. Home mortgage lending accounted for 70.0 percent of total bank originations throughout the evaluation period.

### **Inside/Outside Ratio**

The ratio is a bank-wide calculation and not calculated by individual rating area or AA. The analysis is limited to bank originations and purchases and does not include any affiliate data. For the combined three-year evaluation period, FNB originated a majority of all loan products inside the bank's AAs (89.1 percent). The percentages of loans made inside the AAs, by loan type, are as follows: home mortgage loans: 87.9 percent; small loans to businesses: 91.1 percent; and small loans to farms: 92.8 percent.

### **Other Performance**

#### **Lending Test**

FNB developed the Family Homeownership Program and Family Home Improvement/Renovation Program as home mortgage products designed to facilitate homeownership and home improvements to LMI borrowers.

FNB offers the Family Homeownership Program (FHOP), a home purchase mortgage loan program for single family residences throughout its lending footprint. This program includes a lower down payment requirement, reduced closing costs, and a high loan to value. Household income must be less than or equal to 80 percent of the area median income, and home ownership counseling is required. FNB leveraged this program to originate 443 loans totaling over \$31.2 million during the evaluation period throughout the bank's AAs. The bank originated 97 loans totaling over \$7.3 million in the Pittsburgh-Weirton CSA, 43 loans totaling over \$2.8 million in the Youngstown-Warren-Boardman, OH-PA MMSA, five loans totaling \$964 thousand in the state of Maryland, 19 loans totaling \$428 thousand in the state of North

Carolina, 89 loans totaling \$7.0 million in the state of Ohio, and 190 loans totaling \$12.6 million in the state of Pennsylvania.

FNB offers the Family Home Improvement/Renovation Program (FHIRP), a home improvement mortgage loan, for the purchase and refinance of a single family residence throughout its lending footprint. This program includes a lower down payment, reduced closing costs, and a loan up to 100 percent on the completed value. Household income must be less than or equal to 80 percent of the area median income, and home ownership counseling is required. FNB leveraged this program to originate 43 loans totaling over \$3.1 million during the evaluation period throughout the bank's AAs. The bank originated seven loans totaling over \$440 thousand in the Pittsburgh-Weirton CSA, three loans totaling over \$219 thousand in the Youngstown-Warren-Boardman, OH-PA MMSA, three loans totaling \$330 thousand in the state of Maryland, one loan totaling \$148 thousand in the state of North Carolina, ten loans totaling \$814 thousand in the state of Ohio, and 19 loans totaling \$1.2 million in the state of Pennsylvania.

### **State of North Carolina**

FNB works in conjunction with a state housing agency to offer affordable down payment assistance programs to first time and non-first time homebuyers. These programs may include down payment assistance, closing cost assistance, and tax credits. FNB has worked with the North Carolina Housing Finance Association (NCHFA) to offer flexible, affordable loan products under the agency's programs. FNB leveraged these program to originate one loan totaling over \$221 thousand in the Charlotte MMSA and 18 loans totaling 1.8 million in the state of North Carolina during the evaluation period.

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

Pursuant to 12 C.F.R. §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, or any affiliate whose loans have been considered as part of the bank's lending performance, has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this 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.

## Multistate Metropolitan Area Rating

### Charlotte-Concord-Gastonia, NC-SC MMSA

**CRA rating for the Charlotte-Concord-Gastonia, NC-SC MMSA<sup>1</sup>: Satisfactory**

**The lending test is rated:** High Satisfactory

**The investment test is rated:** Low Satisfactory

**The service test is rated:** Low Satisfactory

The major factors that support this rating include:

- FNB's distribution of loans among geographies of different income levels was excellent, based upon excellent home mortgage lending and excellent small business lending.
- FNB's distribution of loans to individuals and businesses of different income levels was good, based upon good home mortgage lending and adequate small business lending.
- The bank has made an adequate level of qualified investments that exhibited adequate responsiveness to AA credit and community needs.
- The bank's branches and alternative delivery systems are readily accessible to all portions of the AA.
- The bank provides a limited level of community development services.

### Description of Bank's Operations in Charlotte-Concord-Gastonia, NC-SC MMSA

The Charlotte-Concord-Gastonia, NC-SC MMSA is comprised of the complete counties of Iredell, Mecklenburg, Rowan, and Union in North Carolina and York in South Carolina. FNB's branch presence in the AA began March 1, 2017 through acquisition activity.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had a 0.4 percent deposit market share in the AA and is ranked eight out of 35 financial institutions doing business in the AA. The bank made 1.8 percent of its total evaluation period HMDA and CRA loans in the AA. Primary competitors include Bank of America, National Association, which ranked first in deposit market share (74.8 percent) with 61 offices, Wells Fargo Bank, National Association, which ranked second in deposit share (15.0 percent) with 91 offices, and Branch Banking and Trust Co., which ranked third in deposit share (3.0 percent) with 70 offices.

FNB provides a full-range of loan and deposit products and services in the AA through 16 full-service branches. One branch is located in a low-income geography. Two are located in moderate-income geographies, four are located in middle-income geographies, and nine are located in upper-income geographies.

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

Refer to the community profile for the Charlotte-Concord-Gastonia, NC-SC MMSA in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## **Scope of Evaluation in Charlotte-Concord-Gastonia, NC-SC MMSA**

The Charlotte-Concord-Gastonia, NC-SC MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. The evaluation period start date was March 1, 2017 in the rating area for all reportable activity.

The rating is based on results of the full-scope area. Please see appendix A for more information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Charlotte-Concord-Gastonia, NC-SC MMSA**

### **LENDING TEST**

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

The bank's performance under the lending test in Charlotte-Concord-Gastonia, NC-SC MMSA is rated High Satisfactory based on full-scope reviews.

#### **Lending Activity**

The lending activity is adequate. FNB originated a poor volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

Refer to Tables 1 Lending Volume in the Charlotte-Concord-Gastonia, NC-SC MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

FNB's market share and ranking in home mortgage loans and small loans to businesses are weaker than the bank's market share and ranking in deposits. Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had \$749 million in deposits with a 0.4 percent deposit market share in the AA. FNB ranked eighth in total deposits out of 35 banks in the AA. FNB originated 343 home mortgage loans and 282 small business loans in 2017.

According to 2017 peer mortgage data, FNB ranked in the top 10.0 percent of lenders, 44 out of 632 lenders, originating home mortgage loans in the AA. The bank's market share of 0.5 percent and rank in loans is near to the bank's market share and rank in deposits. The five largest mortgage lenders have captured 29.8 percent of the market.

Analysis of the bank's small business lending level cannot be performed. The most recent peer data is from 2016, prior to FNB's entrance into the AA.

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

## **Home Mortgage Loans**

The geographic distribution of the bank's home mortgage loan originations and purchases was excellent.

Refer to Table O in the Charlotte-Concord-Gastonia, NC-SC MMSA 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.

During the 2017 evaluation period, the distribution of home mortgage lending in both low- and moderate- income (LMI) geographies was excellent. The proportion of loans exceeded the percentage of owner-occupied housing units in both geographies, and also exceeded the aggregate distribution of loans in those geographies.

## **Small Loans to Businesses**

The geographic distribution of the bank's originations and purchases of small loans to businesses was excellent.

Refer to Table Q in the Charlotte-Concord-Gastonia, NC-SC MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

During the 2017 evaluation period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans exceeded the percentage of businesses in low-income geographies, and was below the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in low-income geographies exceeded the aggregate distribution of loans in those geographies, and exceeded the distribution of loans in moderate-income geographies.

## **Lending Gap Analysis**

We reviewed summary reports and maps and analyzed FNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

### **Home Mortgage Loans**

The distribution of the bank's home mortgage loans to LMI borrowers was good.

Refer to Tables P in the Charlotte-Concord-Gastonia, NC-SC MMSA 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 distribution of the bank's home mortgage lending during the 2017 evaluation period was good. The proportion of loans was significantly below the percentage of low-income and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI borrowers.

The high cost of housing and the need for additional affordable housing significantly impacted the ability to make home mortgage loans to LMI borrowers. These issues were considered when evaluating the bank's performance in the AA. The bank's ability to make mortgage loans is limited by the income levels of low- and moderate-income individuals and families, and the high cost of housing.

### **Small Loans to Businesses**

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table R in the Charlotte-Concord-Gastonia, NC-SC MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

During the 2017 evaluation period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was significantly below the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses.

### **Community Development Lending**

FNB's level of CD lending in the AA is poor, and had a neutral impact on lending performance in the AA. The neutral impact is due to the limited time the bank was in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to Table 1 Community Development Lending in the Charlotte-Concord-Gastonia, NC-SC MMSA section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table O includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table O does not separately list community development loans.

FNB originated one loan totaling \$1 million and representing 1.2 percent of allocated tier 1 capital. The CD loan exhibited poor responsiveness to the credit and CD needs in the AA, which only supported affordable housing.

The \$1 million loan was for the purchase of an existing 25 unit complex with rents below Housing and Urban Development's (HUD) Fair Market Value (FMV) in a moderate-income CT. The project served primarily LMI tenant population.

## **INVESTMENT TEST**

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

FNB's performance under the investment test in Charlotte-Concord-Gastonia, NC-SC MMSA is rated Low Satisfactory based on full-scope reviews.

Refer to Table 14 in the Charlotte-Concord-Gastonia, NC-SC MMSA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

FNB made an adequate level of qualified investments, including grants and donations. While not innovative or complex, these investments exhibited adequate responsiveness to the credit and CD needs in the AA. Qualified investments totaled \$9.8 million, with current period investments totaling \$1 million; prior period investments of \$8.8 million; and one thousand dollars in grants. The prior period investments were part of the acquisition the bank made and are still outstanding and continue to benefit the assessment area. Investments benefiting the AA during the evaluation represented 11.9 percent of allocated tier 1 capital.

During the evaluation period, the bank invested \$1 million in four SBIC funds benefitting economic development needs of the AA. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The prior period investments were part of the acquisition the bank made and are still outstanding and continue to benefit the assessment area. The remaining balance of \$8.8 million is in three qualifying mortgage backed securities secured by loans to LMI borrowers.

The bank made a grant to a community service organization that provides clothing for job interviews to LMI individuals in AA.

## **SERVICE TEST**

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

The bank's performance under the service test in Charlotte-Concord-Gastonia, NC-SC MMSA is rated Low Satisfactory based on full-scope review.

#### **Retail Banking Services**

FNB's branch distribution and retail service performance is adequate.

Refer to Table 15 in the Charlotte-Concord-Gastonia, NC-SC MMSA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's branches are reasonably accessible to essentially all portions of the Charlotte MMSA. The bank has 16 branches within the AA, with one branch in low-income CTs and three branches in moderate-income CTs. The percentages of branches in low- and moderate-income CTs are near to the level of population in the low- and moderate-income areas.

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. In March 2017, the bank entered into the market through an acquisition. It consisted of 16 branches including one in a low-income geography and three in moderate-income geographies.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours.

### **Community Development Services**

Based on the level of CD services in the Charlotte-Concord-Gastonia, NC-SC MMSA, we concluded the provision of CD services is adequate.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities and the bank's length of time in the area.

FNB employees from various lines of business provided technical assistance to five different CD organizations. The bank had five employees provided outreach totaling 45 hours in the AA. FNB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services include:

- An employee served on the board and provided loan review services for a SBA Certified Development Organization, which partners with banks for the purpose of financing real estate and heavy equipment for small businesses.
- An employee served on the board of a charitable foundation, which provides assistance to LMI families and individuals with urgent needs. The foundation awards grants to a variety of community nonprofit organizations that provide assistance to those in need.
- An employee served on the board of a community organization, which provides groceries to LMI individuals and families through a network of 23 emergency food pantries.
- An employee provided technical expertise services to a housing organization, which offers programs including housing counseling, foreclosure prevention, financial literacy and tax preparation services.
- An employee provided technical expertise to a nonprofit organization, which empowers LMI women to achieve economic independence by providing a network of support, professional attire and development tools.

## **Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA**

### **CRA rating for the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA<sup>2</sup>: Satisfactory**

**The lending test is rated:** High Satisfactory

**The investment test is rated:** High Satisfactory

**The service test is rated:** High Satisfactory

The major factors that support this rating include:

- FNB's distribution of loans among geographies of different income levels was good, based upon good home mortgage lending and good small business lending.
- FNB's distribution of loans to individuals and businesses of different income levels was good, based upon good home mortgage lending and good small business lending.
- The bank has made an adequate level of community development loans.
- The bank has made a good level of qualified investments that exhibited adequate responsiveness to AA credit and community needs.
- The bank's branches and alternative delivery systems are readily accessible to all portions of the AA.
- The bank provides an adequate level of community development services.

## **Description of Bank's Operations in Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA**

The Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA ("Pittsburgh-Weirton CSA") is comprised of the Pittsburgh, PA MSA and Weirton-Steubenville, WV-OH MSA. The Pittsburgh, PA MSA is comprised of the complete counties of Alleghany, Armstrong, Beaver, Butler, Fayette, Washington, and Westmoreland in Pennsylvania. The Weirton-Steubenville, WV MSA is comprised of the complete counties of Brooke in West Virginia and Jefferson in Ohio.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had over \$6.6 billion in deposits or 4.8 percent deposit market share in the AA, which represented 29.2 percent of the bank's total deposits. The bank made 29.0 percent of its total evaluation period HMDA and CRA loans in the AA. The bank's deposit market share is ranked fifth out of 58 financial institutions in the Pittsburgh-Weirton CSA doing business in the AA. Primary competitors include PNC Bank, National Association, which ranked first in deposit market share (42.4 percent) with 144 offices, the Bank of NY Mellon, which ranked second in deposit market share (14.0 percent) with two offices, BNY Mellon, National Association, which ranked third in deposit

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<sup>2</sup> This rating reflects performance within the consolidated metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the consolidated metropolitan area.

market share (9.1 percent) with one office, and Citizens Bank, which ranked number four in deposit market share (7.0 percent) with 121 offices.

FNB provides a full-range of loan and deposit products and services in the AA through 95 full-service branches; six are located in low-income, 19 are located in moderate-income, 42 are located in middle-income, and 27 are located in upper-income, and one located in non-designated geographies.

Refer to the community profile for the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA**

The Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA was selected for analysis using full-scope procedures because it is the only AA in the rating area.

The rating is based on results of the full-scope area. Please see appendix A for more information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA**

### **LENDING TEST**

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

The bank's performance under the lending test in Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA is rated High Satisfactory based on full-scope reviews.

#### **Lending Activity**

FNB originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence. Lending levels reflect adequate responsiveness to credit needs in the AA, taking into account the number and amount of home mortgage, small business, and small farm loans.

Refer to Table 1 Lending Volume in the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had \$6.6 billion in deposits with a deposit market share of 4.8 percent. FNB ranked fifth in total deposits out of 58 banks in the AA. FNB originated 7,278 home mortgage loans and 2,924 small business loans 2015 through 2017.

According to 2017 peer mortgage data, FNB ranked in the top one percent of lenders, fifth out of 563 lenders, originating home mortgage loans in the AA. The bank's market share of 3.3

percent and rank in loans is weaker than the bank's market share and rank in deposits. The four largest mortgage lenders have captured 27.1 percent of the market.

According to 2016 peer small business data, FNB is ranked 10 out of 123 lenders, originating small business loans in the AA. The bank's market share of 2.1 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 59.4 percent of the market.

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

### **Home Mortgage Loans**

The geographic distribution of the bank's home mortgage loan originations and purchases was good.

Refer to Table O in the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA 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.

During the 2015 through 2016 evaluation period, the distribution of home mortgage lending in both LMI geographies was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and somewhat near to in moderate-income geographies, and also somewhat near to the aggregate distribution of loans in low-income geographies and exceeded in moderate-income geographies. Performance during the 2017 evaluation period was consistent with performance in the prior period and was good.

### **Small Loans to Businesses**

The geographic distribution of the bank's originations and purchases of small loans to businesses was good.

Refer to Table Q in the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

During the 2015 through 2016 evaluation period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans was below the percentage of businesses in low-income geographies, and exceeded in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was below the aggregate distribution of loans in those geographies, and exceeded the distribution of loans in moderate-income geographies. Performance during the 2017 evaluation period was not consistent with performance in the prior period and was poor.

### **Small Loans to Farms**

The geographic distribution of the bank's originations and purchases of small loans to farms.

Refer to Table S in the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

During the 2015 through 2016 evaluation period, the distribution of small loans to farms in LMI geographies was good. The proportion of loans was significantly below the portion of farms in low-income geographies, and exceeded the percentage of farms in moderate-income geographies. The proportion of small farms exceeded the aggregate distribution of loans in moderate-income geographies. Performance during the 2017 evaluation period was not enough to perform an analysis. FNB did not originate or purchase enough small farm loans during 2017 to enable a meaningful analysis of the bank's performance.

### **Lending Gap Analysis**

We reviewed summary reports and maps and analyzed FNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

#### **Home Mortgage Loans**

The distribution of the bank's home mortgage loans to LMI borrowers was adequate.

Refer to Table P in the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA 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 distribution of the bank's home mortgage lending during the 2015 through 2016 evaluation period was adequate. The proportion of loans was significantly below the percentage of low-income and somewhat near to moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI borrowers. Performance in the 2017 evaluation period was consistent with performance in the prior period and was good.

The high cost of housing and the need for additional affordable housing significantly impacted the ability to make home mortgage loans to low-income borrowers. These issues were considered when evaluating the bank's performance in the AA. The bank's ability to make mortgage loans is limited by the income levels of low- and moderate-income individuals and families, and the high cost of housing.

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

The borrower distribution of the bank's originations and purchases of small loans to businesses was good.

Refer to Table R in the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

During the 2015 through 2016 evaluation period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was below the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. Performance in the 2017 evaluation period was weaker than performance in the prior period and adequate.

### **Small Loans to Farms**

The borrower distribution of the bank's originations and purchases of small loans to farms was good.

Refer to Table 12 in the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

During the 2015 through 2016 evaluation period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was below the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. Performance in the 2017 evaluation period was not enough to perform a meaningful analysis. FNB did not originate or purchase enough small farm loans during 2017 to enable a meaningful analysis of the bank's performance.

### **Community Development Lending**

FNB's level of CD lending in the AA is adequate, and had a neutral impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to Table 1 Community Development Lending in the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table O includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table O does not separately list community development loans.

FNB originated nine loans totaling \$25.3 million and representing 3.7 percent of allocated tier 1 capital. CD loans originated exhibited adequate responsiveness to the credit and community credit needs in the AA. The majority of the loans supported economic development in the AA.

Examples of CD loans originated during the evaluation period include:

- \$7 million loan to an organization for the construction of a parking garage in the Central Business District of the City of Pittsburgh. The organization's goals are to create jobs, increase the city's tax base, and improve the vitality of businesses, neighborhoods, and the city's livability as a whole;
- \$9 million loan to build a Low Income Housing Tax Credit (LIHTC) building for LMI residents in a low-income CT.; and

- \$1 million loan to finance the expansion and renovation of a nonprofit organization's existing facility. The organization provides services to LMI children in the AA.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

FNB's performance under the investment test in Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA is rated High Satisfactory based on full-scope reviews.

Refer to Table 14 in the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

FNB made a good level of qualified investments, including grants and donations. While not innovative or complex, these investments exhibited adequate responsiveness to the credit and CD needs in the AA. Qualified investments totaled \$45.3 million, with current period investments totaling \$31.7 million; prior period investments of \$12.3 million, and \$1.2 million in grants. Investments benefiting the AA during the evaluation represented 6.64 percent of allocated tier 1 capital.

During the evaluation period, the bank invested \$19.8 million in four LIHTC funds benefitting affordable housing needs of the AA. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balances of \$5.4 and \$6.9 million include 19 qualifying mortgage backed securities secured by loans to LMI borrowers and other qualifying CD investments activities, respectively.

A majority of the grants were to community service organizations that meet the needs of LMI individuals and families in the AA by providing art enrichment programs, mentoring programs, job training, food, and temporary housing. A limited number of grants were given to organizations that engage in economic development in the assessment and to organizations that engage in activities to revitalize and stabilize the AA.

Examples of qualified donations in this AA include:

- a \$208 thousand donation to a community service organization that serves as an alternative to public education for low income children in high risk areas.
- a \$150 thousand donation to an economic development organization whose mission is to facilitate investment and reinvestment, create jobs, and enhance the competitiveness of LMI communities.
- a \$222 thousand donation to a community service organization operating in a state designated distressed area that provides foreclosure prevention training, education, and counseling. The organization provides community education through conferences and summits.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA is rated High Satisfactory based on full-scope review.

### **Retail Banking Services**

FNB's branch distribution and retail service performance is excellent.

Refer to Table 15 in the Pittsburgh-Weirton-Steubenville, PA-OH-WV section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's branches and alternative delivery systems are readily accessible to all portions of the AA. The bank has 95 branches within the AA, with six branches in low-income CTs and 19 branches in moderate-income CTs. The percentages of branches in low- and moderate-income CTs are near to the level of population in the low- and moderate-income areas.

The acquisition of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank acquired 13 branches in April of 2016. The bank did not open branches and closed seven branches, resulting in a net increase of six branches in the AA, including one in a low-income geography and five in moderate-income geographies. The bank closed the seven branches after determining they were low performing and in close proximity to other branches that could be consolidated. The bank uses standard procedures in determining closures, which consider branch traffic and profitability, as well as proximity and accessibility of other branches.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. Branch hours vary, but mainly operate during traditional banking hours, while some also operate on Saturdays.

### **Community Development Services**

Based on the level of CD services in the Pittsburgh-Weirton CSA, we concluded the provision of CD service is adequate.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities.

FNB employees from various lines of business provided technical assistance to 26 different CD organizations totaling 834 hours during the evaluation period. The bank had 21 employees that provided outreach in the AA. FNB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services:

- Employees served on the board of a nonprofit organization, which promotes affordable housing.

- An employee served on the board of an outreach organization, which meets the needs of LMI individuals and families. The organization operates a large food bank and provides interim housing for LMI individuals and families in AA. The organization also provides job training, computer classes, and low-income car ownership opportunities.
- Two employees served on the board of a nonprofit organization, which serves to assist LMI households experiencing hardships by providing utility assistance and other services that lead to self-sufficiency.
- An employee served on the loan committee for an organization which provides small dollar loans to low-income parents. The loans are provided to pay for a car purchase or repair that supports job retention or enables a family member to remain in school.
- An employee served on the board of a Community Development Financial Institution (CDFI). The CDFI provides capital to underserved markets and business education to small businesses, which will result in positive economic and social impact.

## Youngstown-Warren-Boardman, OH-PA MMSA

### CRA rating for the Youngstown-Warren-Boardman, OH-PA MMSA <sup>3</sup>:

**Satisfactory**

**The lending test is rated:** Low Satisfactory

**The investment test is rated:** Low Satisfactory

**The service test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs.
- FNB's distribution of loans among geographies of different income levels was adequate, based upon adequate small business lending.
- FNB's distribution of loans to businesses of different income levels was good, based upon good small business lending.
- The bank has made an adequate level of community development loans.
- The bank has made an adequate level of qualified investments that exhibited adequate responsiveness to AA credit and community needs.
- The bank's branches and alternative delivery systems are reasonably accessible to essentially all portions of the AA.
- The bank provides an adequate level of community development services.

### Description of Bank's Operations in Youngstown-Warren-Boardman, OH-PA MMSA

The Youngstown-Warren-Boardman, OH-PAMMSA ("Youngstown-Warren MMSA") is comprised of the complete counties of Mahoning, and Trumbull in Ohio, and Mercer in Pennsylvania.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had a 12.4 percent deposit market share in the AA and is ranked second out of 19 financial institutions doing business in the Youngstown-Warren MMSA. The bank made 7.7 percent of its total evaluation period HMDA and CRA loans in the AA. Primary competitors include Huntington National Bank, which ranked first in deposit market share (21.3 percent) with 39 offices, and PNC Bank, National Association, which ranked third in deposit market share (12.2 percent) with 20 offices.

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<sup>3</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

FNB provides a full-range of loan and deposit products and services in the AA through 19 full-service branches; two are located in low-income, one is located in a moderate-income, 10 are located in middle-income, and six are located in upper-income geographies.

Refer to the community profiles for the Youngstown-Warren MMSA in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## **Scope of Evaluation in Youngstown-Warren-Boardman, OH-PA MMSA**

The Youngstown-Warren-Boardman, OH-PA MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area.

The rating is based on results of the full-scope area. Please see appendix A for more information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Youngstown-Warren-Boardman, OH-PA MMSA**

### **LENDING TEST**

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

The bank's performance under the lending test in Youngstown-Warren-Boardman, OH-PA MMSA is rated Low Satisfactory based on full-scope reviews.

#### **Lending Activity**

Refer to Tables 1 Lending Volume in the Youngstown-Warren-Boardman, OH-PA MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

FNB originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence. Lending levels reflect adequate responsiveness to credit needs in the AA, taking into account the number and amount of home mortgage and small business.

FNB's market share and ranking in home mortgage loans and small loans to businesses are weaker than the bank's market share and ranking in deposits. Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had \$1.2 billion in deposits with a deposit market share of 12.4 percent. FNB ranked second in total deposits out of 19 banks in the AA. FNB originated 1,928 home mortgage loans and 779 small business loans 2015 through 2017.

According to 2017 peer mortgage data, FNB ranked in the top 10 percent of lenders, fourth out of 575 lenders, originating home mortgage loans in the AA. FNB's market share of 5.2 percent and rank in loans is weaker than the bank's market share and rank in deposits. The four largest mortgage lenders have captured 21.9 percent of the market.

According to 2016 peer small business data, FNB is ranked ninth out of 86 lenders, originating small business loans in the AA. FNB's market share of 3.3 percent and market share ranking in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 54.1 percent of the market.

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

### **Home Mortgage Loans**

The geographic distribution of the bank's home mortgage loan originations and purchases was poor.

Refer to Table O in the Youngstown-Warren-Boardman, OH-PA MMSA 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.

During the 2015 through 2016 evaluation period, the distribution of home mortgage lending in LMI geographies was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and below moderate-income geographies. The proportion of loans exceeded the aggregate distribution of loans in LMI geographies. Performance during the 2017 evaluation period was stronger than performance in the prior period and was adequate.

### **Small Loans to Businesses**

The geographic distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table Q in the Youngstown-Warren-Boardman, OH-PA MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

During the 2015 through 2016 evaluation period, the distribution of small loans to businesses in LMI geographies was adequate. The proportion of loans was well below the percentage of businesses in low-income geographies, and was somewhat near to moderate-income geographies. The proportion of small loans to businesses in low-income geographies was significantly below the aggregate distribution of loans, and exceeded the distribution of loans in moderate-income geographies. Performance during the 2017 evaluation period was stronger than performance in the prior period and was good.

### **Lending Gap Analysis**

We reviewed summary reports and maps and analyzed FNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

## Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers was adequate.

Refer to Tables P in the Youngstown-Warren-Boardman, OH-PA MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

FNB exhibits adequate distribution of loans among individuals of different income levels, given the product lines offered by the bank.

The distribution of the bank's home mortgage lending during the 2015 through 2016 evaluation period was adequate. The proportion of loans was significantly below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI borrowers. Performance in the 2017 evaluation period was stronger than performance in the prior period and was good.

## Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses was good.

Refer to Table R in the Youngstown-Warren-Boardman, OH-PA MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

During the 2015 through 2016 evaluation period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was below the percentage of small businesses, but was exceeded the aggregate distribution of loans to those businesses. Performance in the 2017 evaluation period was weaker than performance in the prior period and adequate.

## Community Development Lending

FNB's level of CD lending in the AA is adequate, and had a neutral impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to Table 1 Community Development Lending in the Youngstown-Warren-Boardman, OH-PA MMSA section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table O includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table O does not separately list community development loans.

FNB originated one loan totaling \$12.5 million and representing 9.4 percent of allocated tier 1 capital. The CD loan originated exhibited adequate responsiveness to the credit and

community credit needs in the AA. The loan of \$12.5 million loan to a newly built nursing facility serving a majority of Medicaid recipients, which supported community services to LMI individuals in the AA.

## **INVESTMENT TEST**

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

FNB's performance under the investment test in Youngstown-Warren-Boardman, OH-PA MMSA is rated Low Satisfactory based on full-scope reviews.

Refer to Table 14 in the Youngstown-Warren-Boardman, OH-PA MMSA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

FNB made an adequate level of qualified investments, including grants and donations. While not innovative or complex, these investments exhibited adequate responsiveness to the credit and CD needs in the AA. Qualified investments totaled \$4 million, with current period investments totaling \$2.6 million; prior period investments of \$1.2 million; and \$272 thousand in grants. Investments benefiting the AA during the evaluation represented 3.0 percent of allocated tier 1 capital.

During the evaluation period, the bank invested \$2.6 million in five SBIC fund benefitting economic development needs of the AA. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance of \$1.2 million in 11 qualifying mortgage backed securities secured by loans to LMI borrowers.

A majority of the level of grants were to community service organizations that meet the needs of LMI individuals and families in the AA by distributing food, providing temporary housing, serving victims of domestic violence, and offering medical services. A limited number of grants were given to organizations that provide affordable housing, organizations that engage in economic development in the assessment area, and to organizations that engage in activities to revitalize and stabilize the AA.

Examples of qualified donations in this AA include:

- \$3 thousand grant to an organization that provides support to entrepreneurs, start-ups, and fledgling businesses. The organization provides facilities, equipment, and counseling to its clients.
- \$5 thousand grant to a community service organization that provides medical and dental services, wheelchairs, home entrance ramps, and van equipment for handicapped LMI individuals.
- \$239 thousand grant made in the form of gratis occupancy of a building owned by the bank. The building is used by the benefiting organization which provides science and technology educational services to LMI students.

## **SERVICE TEST**

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

The bank's performance under the service test in Youngstown-Warren-Boardman, OH-PA MMSA is rated Low Satisfactory based on full-scope reviews.

### **Retail Banking Services**

FNB's branch distribution and retail service performance is adequate.

Refer to Table 15 in the Youngstown-Warren-Boardman, OH-PA MMSA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's branches and alternative delivery systems are reasonably accessible to essentially all portions of the AA. The bank has 19 branches within the AA, with two branches in low-income CTs and one branch in a moderate-income CT. The percentage of branches in low-income CTs is near to the level of population in the low-income areas. The percentage of the branches in the moderate-income CT is below the level of population in the moderate-income areas.

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch within the AA, which was located in an upper-income census tract. The bank closed this branch due to a low volume of transactions, and was the primary branch for a small portion of customers. The bank uses standard procedures in determining closures, which consider branch traffic and profitability, as well as proximity and accessibility of other branches.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some branches offering Saturday hours.

### **Community Development Services**

Based on the level of CD services in the Youngstown-Warren-Boardman, OH-PA MMSA, we concluded the provision of CD service is adequate.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a limited number of CD services, consistent with its capacity and expertise to conduct specific activities.

FNB employees from various lines of business provided technical assistance to eleven different CD organizations totaling 361 hours during the evaluation period. The bank had 11 employees that provided outreach in the AA. FNB staff served on boards or committees for organizations that promote community services targeted to LMI individuals and families and economic development.

Examples of some of these services include:

- An employee provided financial literacy instruction through a nonprofit organization and partner agency network program. The organization helps clients overcome barriers by providing housing option services, transportation access and health initiatives.
- Two employees served as board and committee members of a community action partnership program, which is administered by the school district, promoting school readiness for children of LMI families through providing education, mental health and social services.
- Two employees served on the board of a nonprofit organization that provides food services to LMI individuals and families.
- An employee served on the board of a nonprofit agency, which manages three industrial and business parks. It is the partner for a new and expanding businesses and offers financial assistance in a region focused on growth.

## State Rating

### State of Maryland

<b>CRA Rating for Maryland<sup>4</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	High Satisfactory
<b>The investment test is rated:</b>	High Satisfactory
<b>The service test is rated:</b>	Low Satisfactory

The major factors that support this rating include:

- FNB's distribution of loans among geographies of different income levels was adequate, based upon adequate home mortgage lending and good small business lending.
- FNB's distribution of loans to individuals and businesses of different income levels was adequate, based upon adequate home mortgage lending and adequate small business lending.
- The bank has made relatively high level of community development loans, which had a significant positive impact on the performance.
- The bank has made a significant level of qualified community development investments and grants, which exhibits good responsiveness to credit and community needs.
- The bank's branches and alternative delivery systems are reasonably accessible to essentially all portions of the AA.

### Description of Bank's Operations in Maryland

FNB's operations consisted of one AA in the state of Maryland. The Washington-Baltimore-Arlington CSA, which combines the Baltimore-Towson MSA and Silver Spring-Frederick-Rockville MD. The AA is comprised of the complete counties of Ann-Arundel, Baltimore, Baltimore City, Harford, Howard, Montgomery, and Queen Anne's in Maryland.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had a 1.0 percent deposit market share and is ranked 14 out of 95 financial institutions in the state. The bank made 7.1 percent of its total evaluation period HMDA and CRA loans in the state. Primary competitors include Bank of America, National Association, which ranked first in deposit market share (22.4 percent) with 154 offices, Manufacturers and Traders Trust Company, which ranked second in deposit market share (13.7 percent) with 176 offices, and PNC Bank, National Association which ranked third in deposit market share (9.8 percent) with 203 offices.

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<sup>4</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

FNB provides a full-range of loan and deposit products and services in the state through 31 full-service branches; two are located in low-income, three are located in moderate-income, 11 are located in middle-income, and 15 are located in upper-income geographies.

Refer to the community profiles for the state of Maryland in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## **Scope of Evaluation in Maryland**

The Washington-Baltimore-Arlington CSA was selected for analysis using full-scope procedures because it is the only AA in the rating area.

The rating is based on results of the full-scope area. Please see appendix A for more information.

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

### **LENDING TEST**

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

The bank's performance under the lending test in Maryland is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Washington-Baltimore-Arlington CSA is good.

#### **Lending Activity**

Refer to Tables 1 Lending Volume in the state of Maryland section of appendix D for the facts and data used to evaluate the bank's lending activity.

#### **Washington-Baltimore-Arlington CSA**

FNB originated a poor volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings in home mortgage loans and small loans to businesses are weaker than the bank's market share and ranking in deposits. Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had \$1.5 billion in deposits with a deposit market share of 1.3 percent. FNB ranked 11 in total deposits out of 67 banks in the AA. FNB originated 873 home mortgage loans and 249 small business loans 2015 through 2017.

According to 2017 peer mortgage data, FNB ranked in the top five percent of lenders, 31 out of 629 lenders, originating home mortgage loans in the AA. The bank's market share of 0.8 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest mortgage lenders have captured 22.5 percent of the market.

According to 2016 peer small business data, FNB is ranked 22 out of 158 lenders, originating small business loans in the AA. The bank's market share of 0.3 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 66.7 percent of the market.

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

### **Home Mortgage Loans**

The geographic distribution of the bank's home mortgage loan originations and purchases was adequate.

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

#### Washington-Baltimore-Arlington CSA

During the 2015 through 2016 evaluation period, the distribution of home mortgage lending in both LMI geographies was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and well below moderate-income geographies. The proportion of loans exceeded the aggregate distribution of loans in LMI geographies. Performance during the 2017 evaluation period was weaker than performance in the prior period and was poor.

### **Small Loans to Businesses**

The geographic distribution of the bank's originations and purchases of small loans to businesses was good.

Refer to Table Q in the state of Maryland section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

#### Washington-Baltimore-Arlington CSA

During the 2015 through 2016 evaluation period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans exceeded the percentage of businesses in low-income geographies, and was well below moderate-income geographies. The proportion of small loans to businesses in low-income geographies exceeded the aggregate distribution of loans in those geographies, and was well below the aggregate distribution of loans in moderate-income geographies. Performance during the 2017 evaluation period was weaker than performance in the prior period and was poor.

### **Lending Gap Analysis**

We reviewed summary reports and maps and analyzed FNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

### **Home Mortgage Loans**

The distribution of the bank's home mortgage loans to LMI borrowers was adequate.

Table P in the state of Maryland 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 high cost of housing and the need for additional affordable housing significantly impacted the ability to make home mortgage loans to low-income borrowers. These issues were considered when evaluating the bank's performance in the AA. The bank's ability to make mortgage loans is limited by the income levels of LMI individuals and families and the high cost of housing. There is a need for affordable housing in the AA.

#### Washington-Baltimore-Arlington CSA

The distribution of the bank's home mortgage lending during the 2015 through 2016 evaluation period was adequate. The proportion of loans was significantly below the percentage of low-income and below moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI borrowers. Performance in the 2017 evaluation period was weaker than performance in the prior period and was poor.

### **Small Loans to Businesses**

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table R in the state of Maryland section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

#### Washington-Baltimore-Arlington CSA

During the 2015 through 2016 evaluation period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was significantly below the percentage of small businesses. The proportion of loans exceeded the aggregate distribution of loans to LMI businesses. Performance in the 2017 evaluation period was weaker than performance in the prior period.

### **Community Development Lending**

FNB's level of CD lending in the AA is excellent, and had a significantly positive impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to Table 1 Community Development Lending in the state of Maryland section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table O includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table O does not separately list CD loans.

### Washington-Baltimore-Arlington CSA

FNB originated six loans totaling \$45.6 million and representing 28.5 percent of allocated tier 1 capital. CD loans originated by the bank were excellent in helping address community credit needs. The majority of the loans promoted community revitalization and stabilization.

Examples of CD loans originated during the evaluation period include:

- \$17.8 million refinance loan to a shopping center with a new grocery center to anchor the site located in a moderate-income CT, which will serve to revitalize the neighborhood;
- \$6.7 million loan to finance a 77 unit affordable housing development located in a moderate-income CT, which will participate in the Housing and Urban Development (HUD) Section 8 subsidy program.

## **INVESTMENT TEST**

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

FNB's performance under the investment test in Maryland is rated High Satisfactory. FNB's performance in the full-scope Washington-Baltimore-Arlington CSA is good. We considered the investment opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs. Investments across Maryland, including the AAs had a neutral impact on overall investment test conclusions.

Refer to Table 14 in the state of Maryland section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### Washington-Baltimore-Arlington CSA

FNB made a good level of qualified investments, including grants and donations. While not innovative or complex, these investments exhibited adequate responsiveness to the credit and CD needs in the AA. Qualified investments totaled \$14.2 million, with current period investments totaling \$10.6 million; prior period investments of \$3.5 million; and \$64 thousand in grants. Investments benefiting the AA during the evaluation represented 8.88 percent of allocated tier 1 capital.

During the evaluation period, the bank invested \$4.5 million in two LIHTC funds benefitting affordable housing needs of the AA. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance of \$1.9 million in five qualifying mortgage backed securities secured by loans to LMI borrowers. An additional remaining balance of \$1.6 million in other qualifying CD investments activities.

A majority of the level of grants were to community service organizations that meet the needs of LMI individuals and families in the AA by distributing food, offering educational programs, and providing services and support to the homeless. A limited number of grants were given to organizations that provide affordable housing, promote economic development, and engage in activities to revitalize and stabilize the AA.

Examples of qualified donations in this AA include:

- \$3 thousand grant to a community service organization that provides clothing for job interviews to LMI individuals. The funds were earmarked to cover relocation expenses after the organization's building burned down.
- \$6 thousand grant to a community development organization whose mission to end homelessness. Funds from the grant were earmarked for a program that ensures homeless children and unaccompanied youth have access to schools and other educational resources.
- \$19 thousand grant to a community development organization that provides financial literacy training to students who come from LMI families.

## **SERVICE TEST**

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

The bank's performance under the service test in Maryland is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Washington-Baltimore-Arlington CSA is adequate.

### **Retail Banking Services**

FNB's branch distribution and retail service performance is adequate.

Refer to Table 15 in the state of Maryland section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### Washington-Baltimore-Arlington CSA

The bank's branches and alternative delivery systems are reasonably accessible to geographies of the AA. The bank has 31 branches within the AA, with two branches in low-income CTs and one branch in moderate-income CTs. The percentages of branches in low-income CTs are below the level of population in the low-income areas. The percentages of the branches in moderate-income CTs is well below the level of population in the moderate-income areas. While the percentage of branches and ATMs are lower than both the distribution of population and geographies by tract income level, the OCC considered the level of lending in LMI geographies and to LMI individuals across the AA and determined it to be adequate. We reviewed maps and analyzed FNB's home mortgage and small business lending activity over the evaluation period and determined lending was generally distributed throughout the AA. The

loan distribution demonstrates the bank's ability to reach low- and moderate-income areas and customers with the bank's current branch distribution.

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened two branches and closed two branches, resulting in a net zero opening and closing of branches in the AA. All four branches were located in upper-income census tracts. The bank closed one branch due to profitability, and closed the other branch after opening one of the new branches, which the bank determined is in a better location. The bank uses standard procedures in determining closures, which consider branch traffic and profitability, as well as proximity and accessibility of other branches.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with a majority of branches offering Saturday hours.

### **Community Development Services**

FNB's performance in providing community development services in the state of Maryland is very poor.

#### Washington-Baltimore-Arlington CSA

Based on the level of CD services in the Washington-Baltimore-Arlington CSA, we concluded the provision of CD service is very poor.

The bank conducted or supported a few CD services, consistent with its capacity and expertise to conduct specific activities.

The bank provided a limited level of community development services. FNB employees from various lines of business provided technical assistance to six different CD organizations totaling 97 hours during the evaluation period. The bank had six employees that provided outreach in the AA. FNB staff served on boards and committees for organizations that provide affordable housing community services and financial literacy instruction targeted to LMI individuals and families.

Examples of some of these services include:

- An employee served on the board of a local nonprofit organization which provides services to LMI individuals impacted by violence. The organization provides emergency shelter and transitional housing for clients and families.
- Employees provided technical expertise in the form of financial literacy instruction through a 501c3 organization, which offers programs to children and teenagers, particularly from LMI communities.

## State of North Carolina

### CRA Rating for North Carolina<sup>5</sup>: **Satisfactory**

**The lending test is rated:** Low Satisfactory

**The investment test is rated:** Low Satisfactory

**The service test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs, taking into account the number and amount of home mortgage and small business.
- FNB's distribution of loans among geographies of different income levels was adequate, based upon adequate home mortgage lending and good small business lending.
- FNB's distribution of loans to individuals and businesses of different income levels was adequate, based upon adequate home mortgage lending and good small business lending.
- The bank has made an adequate level of qualified investments that exhibited good responsiveness to AA credit and community needs.
- The bank's branches and alternative delivery systems are accessible to essentially all portions of the communities in which it operates.

## Description of Bank's Operations in North Carolina

FNB's operations consisted of eight AAs in the state of North Carolina. The Fayetteville MSA is comprised of the Cumberland County. The Greensboro-Winston Salem-High Point CSA, combines the Greensboro-High Point MSA, Winston-Salem MSA, Burlington MSA, and the Micropolitan Statistical Area of Mount Airy. The AA is comprised of the complete counties of Alamance, Davidson, Forsyth, Guilford, Rockingham, Stokes, Surry, and Yadkin. The Greenville MSA is comprised of Pitt County. The Jacksonville MSA is comprised of the Onslow County. The Myrtle Beach MSA is comprised of Brunswick County. The Raleigh-Durham-Chapel Hill MSA (Raleigh, NC MSA, Durham, NC MSA and the MSA of Sanford, NC) is comprised of Johnston, Wake, Durham, Orange, and Lee counties. The Wilmington MSA is comprised of the New Hanover and Pender Counties. The North Carolina (NC) Non-MSA AA is comprised of Ashe, Avery, Beaufort, Dare, Hyde, Lee, Martin, Moore, Perquimans, Surry, Tyrrell, Washington, Watauga, and Wilkes counties. These non-metropolitan areas were combined for analysis purposes. FNB's branch presence in the state of North Carolina began March 1, 2017 through acquisition activity.

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<sup>5</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had a 2.3 percent deposit market share and is ranked tenth out of 88 financial institutions in the rating area. The bank made 5.5 percent of its total evaluation period HMDA and CRA loans in the state. Primary competitors include Bank of America, National Association, which ranked first in deposit market share (47.3 percent) with 153 offices, Wells Fargo Bank, National Association, which ranked second in deposit market share (15.3 percent) with 330 offices, and Branch Banking and Trust Company, which ranked third in deposit market share (13.9 percent) with 351 offices.

Refer to the community profiles for the state of North Carolina in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## **Scope of Evaluation in North Carolina**

The Greensboro-Winston Salem-High Point CSA and Raleigh-Durham-Chapel Hill CSA were selected for analysis using full-scope procedures. The Greensboro-Winston Salem-High Point CSA was selected for analysis using full-scope procedures because it had the largest percent of the bank's deposits (36.6), loans (37.9), and branches (35.0) within the rating area. The Raleigh-Durham-Chapel Hill CSA was selected due to the high percentage of deposits (20.5) and loans (14.4) in the state.

Fayetteville MSA, Greenville MSA, Jacksonville MSA, Myrtle Beach MSA, NC Non-MSA, and Wilmington MSA were chosen for limited-scope review due to the bank's limited presence in the AAs.

The evaluation period start date was March 1, 2017, for all reportable activity.

Ratings are primarily based on results of the full-scope area. Please see appendix A for more information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA**

### **LENDING TEST**

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

The bank's performance under the Lending Test in North Carolina was rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Greensboro-Winston Salem-High Point CSA and Raleigh-Durham-Chapel Hill CSA was adequate. The level of community development lending had a neutral impact on lending performance.

#### **Lending Activity**

Refer to Tables 1 Lending Volume in the state of North Carolina section of appendix D for the facts and data used to evaluate the bank's lending activity.

### Greensboro-Winston Salem-High Point CSA

FNB originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings in home mortgage loans is weaker than the bank's market share and ranking in deposits. Based on FDIC market share data as of June 30, 2017, FNB had \$1.4 billion in deposits with a deposit market share of 3.0 percent. FNB ranked sixth in total deposits out of 27 banks in the AA. FNB originated 512 home mortgage loans and 226 small business loans in 2017.

According to 2017 peer mortgage data, FNB ranked in the top three percent of lenders, 14 out of 476 lenders, originating home mortgage loans in the AA. FNB's mortgage market share of 1.5 percent is less than their overall deposit market share. The five largest mortgage lenders have captured 30.6 percent of the market.

Analysis of the bank's small business lending level cannot be performed. The most recent peer data is from 2016, prior to FNB's entrance into the AA.

### Raleigh-Durham-Chapel Hill CSA

FNB originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings in home mortgage loans is weaker than the bank's market share and ranking in deposits. Based on FDIC market share data as of June 30, 2017, FNB had \$749 million in deposits with a deposit market share of 1.8 percent. FNB ranked tenth in total deposits out of 35 banks in the AA. FNB originated 149 home mortgage loans and 131 small business loans in 2017.

According to 2017 peer mortgage data, FNB ranked in the top 15 percent of lenders, 69 out of 595 lenders, originating home mortgage loans in the AA. FNB's mortgage market share of 0.2 percent is weaker than their overall deposit market share. The five largest mortgage lenders have captured 29.9 percent of the market.

Analysis of the bank's small business lending level cannot be performed. The most recent peer data is from 2016, prior to FNB's entrance into the AA.

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

### **Home Mortgage Loans**

The geographic distribution of the bank's home mortgage loan originations and purchases was adequate.

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

### Greensboro-Winston Salem-High Point CSA

During the 2017 evaluation period, the distribution of home mortgage lending in was adequate with poor performance in low-income geographies and adequate performance in moderate-income geographies. The proportion of loans was well below the percentage of owner-occupied housing units in low-income geographies and below moderate-income geographies, and somewhat near to the aggregate distribution of loans in LMI geographies.

### Raleigh-Durham-Chapel Hill CSA

During the 2017 evaluation period, the distribution of home mortgage lending in was adequate with poor performance in low-income geographies and adequate performance in moderate-income geographies. The proportion of loans was well below the percentage of owner-occupied housing units in low-income geographies and somewhat near to moderate-income geographies, and well below the aggregate distribution of loans in low-income, and somewhat near to moderate-income geographies.

### **Small Loans to Businesses**

The geographic distribution of the bank's originations and purchases of small loans to businesses was good.

Refer to Table Q in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

### Greensboro-Winston Salem-High Point CSA

During the 2017 evaluation period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans was below the percentage of businesses in low-income geographies, and exceeded the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was below the aggregate distribution of loans. The proportion of loans exceeded the aggregate distribution of loans in moderate-income geographies.

### Raleigh-Durham-Chapel Hill CSA

During the 2017 evaluation period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans is near to the percentage of businesses in low-income geographies, and near to the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in LMI geographies exceeded the aggregate distribution of loans.

### **Lending Gap Analysis**

We reviewed summary reports and maps and analyzed FNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

### **Home Mortgage Loans**

The distribution of the bank's home mortgage loans to LMI borrowers was adequate.

Table P in the state of North Carolina 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.

#### Greensboro-Winston Salem-High Point CSA

The distribution of the bank's home mortgage lending during the 2017 evaluation period was good. The proportion of loans was significantly below the percentage of low-income and exceeded moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI borrowers.

The high cost of housing and the need for additional affordable housing significantly impacted the ability to make home mortgage loans to low-income borrowers. These issues were considered when evaluating the bank's performance in the AA. The bank's ability to make mortgage loans is limited by the income levels of low- and moderate-income individuals and families, and the high cost of housing.

#### Raleigh-Durham-Chapel Hill CSA

The distribution of the bank's home mortgage lending during the 2017 evaluation period was adequate. The proportion of loans was significantly below the percentage of low-income and somewhat near to moderate-income families. The proportion of loans was significantly below the aggregate distribution of loans to low-income borrowers and somewhat near to moderate-income borrowers.

The high cost of housing and the need for additional affordable housing significantly impacted the ability to make home mortgage loans to LMI borrowers. These issues were considered when evaluating the bank's performance in the AA. The bank's ability to make mortgage loans is limited by the income levels of low- and moderate-income individuals and families, and the high cost of housing.

### **Small Loans to Businesses**

The borrower distribution of the bank's originations and purchases of small loans to businesses was good.

Refer to Table R in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

### Greensboro-Winston Salem-High Point CSA

During the 2017 evaluation period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was well below the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses.

### Raleigh-Durham-Chapel Hill CSA

During the 2017 evaluation period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was well below the percentage of small businesses but was somewhat near to the aggregate distribution of loans to those businesses.

## **Community Development Lending**

FNB's level of CD lending in the AA is poor, and had a neutral impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to Table 1 Community Development Lending in the state of North Carolina section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table O includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table O does not separately list CD loans.

### Greensboro-Winston Salem-High Point CSA

FNB's level of CD lending in the AA is poor, and had a neutral impact on lending performance in the AA. FNB did not originate any CD loans in the AA. Although this represents poor performance, the bank's limited time and presence in the AA mitigate a negative impact on the overall Lending Test rating. We also considered the very strong competition for lending in the AA from nationwide institutions and the large industrial loan banks in the AA. These institutions have much greater capacity and expertise.

### Raleigh-Durham-Chapel Hill CSA

FNB's level of CD lending in the AA is poor, and had a neutral impact on lending performance in the AA. FNB did not originate any CD loans in the AA. Although this represents poor performance, the bank's limited time and presence in the AA mitigate a negative impact on the overall Lending Test rating. We also considered the very strong competition for lending in the AA from nationwide institutions and the large industrial loan banks in the AA. These institutions have much greater capacity and expertise.

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

Greenville MSA, Myrtle Beach MSA, NC Non-MSA, and Wilmington MSA was consistent with the bank's overall Low Satisfactory performance under the Lending Test in the state. Performance in the Fayetteville MSA and Jacksonville MSA was not reviewed due to the number of bank loans being below threshold for analysis, and did not impact conclusions about the bank's performance in the state. The bank had limited presence in the AAs as of the evaluation period.

Tables O, P, R, S, and 14 in the state of North Carolina section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

FNB's performance under the Investment Test in North Carolina is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the full-scope Greensboro-Winston Salem-High Point CSA and Raleigh-Durham-Chapel Hill CSA is adequate. We considered the investment opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to Table 14 in the state of North Carolina section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

#### Greensboro-Winston Salem-High Point CSA

FNB made an adequate level of qualified investments, including grants and donations. While not innovative or complex, these investments exhibited adequate responsiveness to the credit needs in the AA. Qualified investments totaled \$2.9 million, with current period investments totaling \$2.3 million; prior period investments of \$531 thousand; and three thousand dollars in grants. The prior period investments were part of the acquisition the bank made and are still outstanding and continue to benefit the assessment area. Investments benefiting the AA during the evaluation represented 2.0 percent of allocated tier 1 capital. The bank had a reasonable number of investment opportunities based on its limited time period in the AA.

During the evaluation period, the bank invested \$1.7 million in two LIHTC funds helping address affordable housing needs of the AA.

All grants made in the AA were to organizations that provide community services including financial literacy classes, support for homeless, and health care for the underprivileged.

Examples of qualified donations in this AA include:

- \$1 thousand grant to a community service organization that provides health care services to LMI individuals.
- \$500 grant to a community service organization that provides financial literacy classes to children from LMI families.
- \$500 grant to a community service organization that distributes food to LMI individuals.

#### Raleigh-Durham-Chapel Hill CSA

FNB made an adequate level of qualified investments, including grants and donations. While not innovative or complex, these investments exhibited good responsiveness to the credit needs in the AA. Qualified investments totaled \$5.6 million, with current period investments totaling \$745 thousand; prior period investments of \$4.8 million; and \$48 thousand in grants. The prior period investments were part of the acquisition the bank made and are still outstanding and continue to benefit the assessment area. Investments benefiting the AA during the evaluation represented 6.99 percent of allocated tier 1 capital.

During the evaluation period, the bank invested \$1 million in a LIHTC fund benefitting affordable housing needs of the AA. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance of \$4.5 million in three qualifying mortgage backed securities secured by loans to LMI borrowers.

All grants made in the AA were to organizations that provide community services.

Examples of qualified donations in this AA include:

- \$35 thousand grant to a community service organization that advocates for economic justice and fair lending in underserved communities.
- \$8 thousand grant to a community service organization that provides various programs and services to youth from LMI families.
- \$5 thousand grant to a community service organization that provides educational programs to youth from LMI families that build character, instill life enhancing values and promote healthy choices through their programs.

### North Carolina Statewide

FNB made 11 statewide qualified investments totaling \$9.4 million during the evaluation period in activities that had a purpose, mandate or function that serves one or more of the bank's AAs. Statewide investments included qualifying mortgage backed securities and LIHTCs benefiting LMI individuals across North Carolina. When considering these and other investments in the full- and limited-scope areas, the \$21.5 million of qualified investments in the AAs and across the rating area represented 5.5 percent of total tier 1 capital. The statewide performance had a positive impact on the conclusion about the bank's performance in the rating area.

### Regional or Nationwide

FNB made five investments totaling \$7.6 million in four qualifying mortgage backed securities that benefitted LMI individuals across North Carolina and South Carolina.

## **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, NC Non-MSA is consistent with North Carolina's overall Low Satisfactory investment test performance. The performance in the Myrtle Beach MSA and Wilmington MSA is stronger due to higher levels of current period or outstanding prior period

investments relative to deposits. Stronger performance did not impact conclusions about the bank's performance in the state. Performance in the Fayetteville MSA, Greenville MSA, and Jacksonville MSA is weaker than the state's overall investment test performance due to limited investment or grants, and is considered poor. Weaker performance did not impact conclusions about the bank's performance in the state.

Refer to the Table 14 in the state of North Carolina section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in North Carolina is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Greensboro-Winston Salem-High Point CSA and Raleigh-Durham-Chapel Hill CSA is adequate.

### **Retail Banking Services**

Refer to Table 15 in the state of North Carolina section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

#### Greensboro-Winston Salem-High Point CSA

FNB's branch distribution and retail service performance is adequate.

The bank's branches and alternative delivery systems are accessible to essentially all portions of the Greensboro-Winston Salem-High Point CSA. The bank has 28 branches in the AA, with no branches in low-income CTs and nine branches in moderate-income CTs. The percentage of branches in moderate-income CTs exceeds the level of population in the moderate-income areas.

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. In March 2017, the bank entered into the market through an acquisition. It consisted of 28 branches including nine in moderate-income geographies, 11 in middle-income geographies, and eight in upper-income geographies.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, and do not offer Saturday hours.

#### Raleigh-Durham-Chapel Hill CSA

FNB's branch distribution and retail service performance is good.

The bank's branches and alternative delivery systems are accessible to essentially all portions of the Raleigh-Durham-Chapel Hill CSA. The bank has 15 branches within the AA, with two branches in low-income CTs and one branch in moderate-income CTs. The percentages of branches in low-income CTs exceeds the level of population in the low-income areas. The percentage of the branch in moderate-income CTs is well below the level of population in the moderate-income areas.

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. In March 2017, the bank entered into the market through an acquisition. It consisted of 15 branches including two in low-income, one in moderate-income, four in middle-income, and eight in upper-income geographies.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, and do not offer Saturday hours.

### **Community Development Services**

FNB's performance in providing community development services in the state of North Carolina is adequate.

#### Greensboro-Winston Salem-High Point CSA

Based on the level of CD services in the Greensboro-Winston Salem-High Point CSA, we concluded the provision of CD service is adequate.

The bank conducted or supported a limited number CD services, consistent with its capacity and expertise to conduct specific activities.

FNB employees provided technical assistance to two different CD organizations, totaling 15 hours. The bank had three employees that provided outreach in the AA. FNB staff served on boards for organizations that provide community services targeted to LMI individuals and families.

Examples of these services include:

- An employee served on the board of a nonprofit organization, which serves LMI communities through the sale of donated items from its stores. The organization funds employment and training programs designed to assist people in finding jobs and opportunities.
- Two employees served on the board for a nonprofit food pantry, which targets needs for LMI seniors.

#### Raleigh-Durham-Chapel Hill CSA

Based on the level of CD services in the Raleigh-Durham-Chapel Hill CSA, we concluded the provision of CD service is adequate.

The bank conducted or supported a limited number of CD services, consistent with its capacity and expertise to conduct specific activities.

FNB employees provided technical assistance to two different CD organizations, totaling 12 hours. The bank had two employees that provided outreach in the AA. FNB staff served on boards of organizations that provide community services targeted to LMI individuals and families.

Examples of these services include:

- An employee served on the board of a community-based organization, which provides LMI young people with a safe, fun, and constructive after-school environment. Programs and services that strengthen life skills, build character and providing support, guidance and hope for the future.
- An employee served on the board of an organization, which provides safe, affordable housing for working homeless men recovering from substance dependency.

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

Based on limited-scope reviews, the bank's performance under the service test in the North Carolina Non-MSA is consistent with the bank's overall Low Satisfactory performance under the service test in North Carolina. Performance in the Wilmington MSA is stronger than the bank's overall performance in the state, and is considered excellent which did not impact conclusions about the bank's performance in the state. Stronger performance is due to the branch distribution in LMI CTs. Performance in the Fayetteville MSA, Greenville MSA, Jacksonville MSA, and Myrtle Beach MSA is weaker than the bank's overall performance in the state, and is considered poor. Weaker performance is due to the bank's limited presence in these AAs, and did not impact conclusions about the bank's performance in the state.

Refer to Table 1 and 15 in the state of North Carolina section of appendix D for the facts and data that support these conclusions.

## State of Ohio

<b>CRA Rating for Ohio<sup>6</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	Low Satisfactory
<b>The investment test is rated:</b>	Outstanding
<b>The service test is rated:</b>	Needs to Improve

The major factors that support this rating include:

- Lending levels reflect a good responsiveness to AA credit needs, taking into account the number and amount of home mortgage and small business.
- FNB's distribution of loans among geographies of different income levels was adequate, based upon adequate home mortgage lending and good small business lending.
- FNB's distribution of loans to individuals and businesses of different income levels was adequate, based upon adequate home mortgage lending and adequate small business lending.
- The bank has made an adequate level of community development loans.
- The bank has made an excellent level of qualified investments that exhibited excellent responsiveness to AA credit and community needs.
- The bank's branches and alternative delivery systems are accessible to limited portions of the communities in which it operates.

## Description of Bank's Operations in Ohio

FNB's consisted of consisted of two AAs in the state of Ohio, the Cleveland-Akron-Canton CSA and Wheeling MSA. The Cleveland-Akron-Canton CSA (Cleveland-Elyria, OH MSA and Akron, OH MSA) is comprised of the complete counties of Cuyahoga, Geauga, Lake, Lorain, Medina, Portage and Summit in Ohio. The Canton-Massillon, OH MSA is excluded from the AA since FNB does not have any branches in this MSA. The Wheeling MSA is comprised of Belmont County.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had a 0.2 percent deposit market share and is ranked 30 out of 221 financial institutions in the rating area. The bank made 9.8 percent of its total evaluation period HMDA and CRA loans in the state. Primary competitors include US Bank, which ranked first in deposit market share (19.0 percent) with 280 offices, Huntington National Bank, which ranked second in deposit share

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<sup>6</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

(14.6 percent) with 464 offices, and Fifth Third Bank, which ranked third in deposit share (13.9 percent) with 325 offices.

Refer to the community profiles for the state of Ohio in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## **Scope of Evaluation in Ohio**

The Cleveland-Akron-Canton CSA was selected for analysis using full-scope procedures because the AA had the largest proportion of the bank's deposits (96.2), loans (97.1), and branches (95.5) within the rating area.

The Wheeling MSA was chosen for limited-scope review due to the bank's limited presence in the Ohio.

Ratings are primarily based on results of the full-scope area. Please see appendix A for more information.

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

### **LENDING TEST**

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

The bank's performance under the Lending Test in Ohio was rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Cleveland-Akron-Canton CSA was adequate. The level of community development lending had a neutral impact on lending performance.

#### **Lending Activity**

Refer to Tables 1 Lending Volume in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's lending activity.

#### **Cleveland-Akron-Canton CSA**

FNB originated a good volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings in home mortgage loans and small loans to businesses are higher than the bank's market share and ranking in deposits.

Based on FDIC market share data as of June 30, 2017, FNB had \$705 million in deposits with a deposit market share of 0.9 percent. FNB ranked 14 in total deposits out of 41 banks in the AA. FNB originated 2,730 home mortgage loans and 630 small business loans from 2015 through 2017.

According to 2017 peer mortgage data, FNB ranked in the top 3.7 percent of lenders, 18 out of 486 lenders, originating home mortgage loans in the AA. FNB's home mortgage market share of 1.3 percent is greater than their overall deposit market share. The five largest mortgage lenders have captured 29.8 percent of the market share.

According to 2016 peer small business data, FNB is ranked 21 out of 125 lenders, originating small business loans in the AA. The bank's market share of 0.4 percent and rank in loans is weaker than the bank's deposit market share and rank in deposits. The five largest small business lenders have captured 61.2 percent of the market share.

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

### **Home Mortgage Loans**

The geographic distribution of the bank's home mortgage loan originations and purchases was adequate.

Refer to Tables 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/purchases.

#### Cleveland-Akron-Canton CSA

During the 2015 through 2016 evaluation period, the distribution of home mortgage lending in both LMI geographies was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in both LMI geographies. The proportion of loans are below the aggregate distribution of loans in LMI geographies. Performance during the 2017 evaluation period was stronger than performance in the prior period and was good. Stronger performance did impact conclusions about the bank's performance in the state.

### **Small Loans to Businesses**

The geographic distribution of the bank's originations and purchases of small loans to businesses was good.

Refer to Table Q in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

#### Cleveland-Akron-Canton CSA

During the 2015 through 2016 evaluation period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans was well below the percentage of businesses in low-income geographies and exceeded the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was below the aggregate distribution of loans. The proportion of loans exceeded the aggregate distribution of loans in moderate-income geographies. Performance during the 2017 evaluation period was consistent with performance in the prior period and was good.

## **Lending Gap Analysis**

We reviewed summary reports and maps and analyzed FNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

### **Home Mortgage Loans**

The distribution of the bank's home mortgage loans to LMI borrowers was adequate.

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.

#### Cleveland-Akron-Canton CSA

The distribution of the bank's home mortgage lending during the 2015 through 2016 evaluation period was adequate. The proportion of loans was significantly below the percentage of low-income and below moderate-income families. The proportion of loans was near to the aggregate distribution of loans to low-income borrowers and exceeded moderate-income borrowers. Performance in the 2017 evaluation period was consistent with performance in the prior period and adequate.

### **Small Loans to Businesses**

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table R in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

#### Cleveland-Akron-Canton CSA

During the 2015 through 2016 evaluation period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was well below the percentage of small businesses, but exceeded the aggregate distribution of loans. Performance in the 2017 evaluation period was consistent with performance in the prior period and adequate.

## **Community Development Lending**

FNB's level of CD lending in the AA is adequate, and had a neutral impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to Table 1 Community Development Lending in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's level of community development lending.

This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table O includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table O does not separately list CD loans.

### Cleveland-Akron-Canton CSA

FNB originated one loan totaling \$2.2 million and representing 2.9 percent of allocated tier 1 capital. The CD loan originated by the bank was adequate in helping address community credit needs. The loan was to a CDFI consortium to develop commercial space in an upper-income CT that borders a low-income CT.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Wheeling MSA is consistent than the bank's overall Low Satisfactory performance under the lending test in Ohio.

Refer to the Tables O, P, R, S, and 14 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

FNB's performance under the investment test in Ohio is rated Outstanding. Based on full-scope review, Cleveland-Akron-Canton CSA is excellent. We considered the investment opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs. Investments across Ohio, including the AAs had a neutral impact on overall investment test conclusions.

Refer to Table 14 in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### Cleveland-Akron-Canton CSA

FNB made a significant level of qualified investments, including grants and donations. While not innovative or complex, these investments exhibited good responsiveness to the credit and CD needs in the AA. Qualified investments totaled \$8.6 million, with current period investments totaling \$5.6 million; prior period investments of \$2.9 million; and \$87 thousand in grants. Investments benefiting the AA during the evaluation represented 11.1 percent of allocated tier 1 capital.

During the evaluation period, the bank invested \$5 million in two LIHTC funds benefitting affordable housing needs of the AA. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance of \$2.9 million in ten qualifying mortgage backed securities secured by loans to LMI borrowers.

A majority of the level of grants were to community service organizations that meet the needs of LMI individuals and families in the AA through food distribution, offering various training programs, providing temporary housing, and distribution of personal and household items. Limited grants were also provided to organizations that provide affordable housing, engage in economic development, or participate in revitalization and stabilization of the AA.

Examples of qualified donations in this AA include:

- \$32 thousand donation to a community service organization that provides programs and services that are focused on ensuring that youth for LMI families are ready to pursue a path to economic self-sufficiency through mentoring, employability skills training, industry-based credential training, career exploration, jobs, and internships.
- \$20 thousand donation to an organization that achieves its mission of community revitalization through the development of affordable housing, promotion of economic development activity through commercial, retail and institutional initiatives, and acting as a catalyst to spur community visioning through comprehensive master planning.
- \$20 thousand grant to a community service organization that provides food, clothing, household goods, emergency services, advocacy services, shelter, and housing solutions program to LMI individuals.

## **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, FNB's performance under the investment test in the Wheeling MSA is weaker than the Ohio's overall Outstanding investment test performance. The Wheeling MSA had a poor volume of qualified investments and no grants during the evaluation period. Weaker performance did not impact conclusions about the bank's performance in the state.

Refer to the Table 14 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Ohio is rated Needs to Improve. Based on full-scope reviews, the bank's performance in the Cleveland-Akron-Canton CSA is poor.

### **Retail Banking Services**

Refer to Table 15 in the state of Ohio section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

#### Cleveland-Akron-Canton CSA

FNB's branch distribution and retail service performance is poor.

The bank's branches and alternative delivery systems are accessible to limited portions of the Cleveland-Akron-Canton CSA. The bank does not have any branches in low-income areas, although almost 12 percent of the population lives in those areas. The percentage of the bank's branches in moderate-income geographies is significantly below the percentage of the population living in those geographies.

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened three branches located in upper-income geographies within the AA.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with all but one of the branches offering Saturday hours.

## **Community Development Services**

FNB's performance in providing community development services in the state of Ohio is adequate.

### Cleveland-Akron-Canton CSA

Based on the level of CD services in the Cleveland-Akron-Canton CSA, we concluded the provision of CD service is adequate.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate level of CD services, consistent with its capacity and expertise to conduct specific activities.

FNB employees from various lines of business provided technical assistance to nine different CD organizations, totaling 247 hours throughout the evaluation period. The bank had eight employees that provided outreach in the AA. FNB staff served on boards and committees for organizations that promote affordable housing, economic development, and community services targeted to LMI individuals and families.

Examples of these services include:

- An employee served as a board member for a nonprofit organization, which is a certified CHDO in the City of East Cleveland. The organization carries out community revitalization through the development of affordable housing, promoting economic development activities through commercial, retail and institutional initiatives.
- An employee served on the board of a citywide development corporation, which provides loans and grants under \$250 thousand to small businesses in the city.
- An employee served on the board and committees of a nonprofit workforce development organization, which serves individuals living in economically distressed areas.
- An employee served on the board of a nonprofit organization, which offers educational programming for youth, employment and training services to assist individuals in accessing knowledge to enter the workforce and develop careers. The organization also

offers business counseling and assistance to individuals who are starting or growing businesses.

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

Based on limited-scope reviews, the bank's performance under the service test in the Wheeling is stronger than the bank's overall Needs to Improve performance under the service test in Ohio. Stronger performance is based on the bank's branch distribution in the AA. Performance in the Wheeling MSA did not impact conclusions about the bank's performance in the state.

Refer to Table 15 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## State of Pennsylvania

<b>CRA Rating for Pennsylvania<sup>7</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	High Satisfactory
<b>The investment test is rated:</b>	High Satisfactory
<b>The service test is rated:</b>	Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs, taking into account the number and amount of home mortgage and small business.
- FNB's distribution of loans among geographies of different income levels was good, based upon good home mortgage lending, good small business lending and excellent small farm lending.
- FNB's distribution of loans to individuals and businesses of different income levels was good, based upon good home mortgage lending, good small business lending, and excellent small farm lending.
- The bank's level of CD lending in the AA is poor, and had a negative impact on lending performance.
- The bank has made a good level of qualified investments that exhibited good responsiveness to AA credit and community needs.
- The bank's branches and alternative delivery systems are accessible to essentially all portions of the AA.
- The bank provides a limited level of community development services.

## Description of Bank's Operations in Pennsylvania

FNB's operations consisted of 11 AAs in the state of Pennsylvania. The Altoona MSA is comprised of Blair County. The East Stroudsburg MSA is comprised of Monroe County. The Erie MSA is comprised of Erie County. The Harrisburg-York-Lebanon CSA is combined of the Harrisburg-Carlisle MSA, Lebanon MSA, and York-Hanover MSA. The counties consisted of Cumberland, Dauphin, Lebanon, and York. Lebanon County was added in February 2016 due to a bank acquisition. The Johnstown MSA is comprised of Cambria County. The Lancaster MSA is comprised of Lancaster County, which was added as of September 2015 due to a bank acquisition. The Philadelphia-Reading-Camden CSA is combined by the Philadelphia MSA and

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<sup>7</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Reading MSA, which consists of the Chester and Berks Counties. The Scranton MSA is comprised of the counties of Lackawanna, Luzerne, and Wyoming. The State College MSA is comprised of Centre County in Pennsylvania. The Williamsport MSA is comprised of Lycoming County. The PA Non-MSA AA is comprised of Bedford, Clinton, Crawford, Greene, Huntingdon, Indiana, Juniata, Lawrence, Mifflin, Northumberland, Schuylkill, Snyder, Somerset, Susquehanna, Union, and Venango counties. These non-metropolitan areas were combined for analysis purposes.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had a 2.9 percent deposit market share and is ranked tenth out of 170 financial institutions in the rating area. The bank made 38.91 percent of its total evaluation period HMDA and CRA loans in the state. Primary competitors include Wells Fargo Bank, National Association, which ranked first in deposit market share (14.5 percent) with 266 offices, PNC Bank, National Association, which ranked second in deposit market share (11.9 percent) with 263 offices and Citizens Bank of Pennsylvania, which ranked third in deposit market share (7.8 percent) with 224 offices.

FNB provides a full-range of loan and deposit products and services in the AA through 151 full-service branches; five are located in low-income, 32 are located in moderate-income, 94 are located in middle-income, 17 are located in upper-income, and three located in non-income geographies.

Refer to the community profiles for the state of Pennsylvania in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## **Scope of Evaluation in Pennsylvania**

The Harrisburg-York-Lebanon CSA, Johnstown MSA, and State College MSA were selected for analysis using full-scope procedures. The Harrisburg-York-Lebanon CSA had the largest percent of the bank's deposits (23.9), loans (7.8), and branches (15.1) within the rating area. In the Harrisburg-York-Lebanon CSA, for the Lending Test geographic distribution and borrower income criteria, we performed separate analyses of 2015, 2016, and 2017 data due to the addition of the Lebanon County in the AA. The Johnston MSA and State College MSA were selected for analysis using full-scope procedures because each AA had not received a full-scope review in the most recent examinations, and the deposit market share indicates the bank is important to the areas.

PA Non-MSA was chosen for limited-scope review due to the AA had been subject to a full-scope review during the most recent CRA evaluation. The Altoona MSA, East Stroudsburg MSA, Erie MSA, Lancaster MSA, Philadelphia-Reading-Camden CSA, Scranton MSA, and Williamsport MSA were chosen for limited-scope review due to the bank's limited presence in the AA.

Ratings are primarily based on results of the full-scope area. Please see appendix A for more information.

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

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Pennsylvania was rated High Satisfactory. Based on a full-scope review, the bank's performance in the Johnstown MSA, and State College MSA was good and adequate in the Harrisburg-York-Lebanon CSA. The level of community development lending had a neutral impact on lending performance.

### Lending Activity

Refer to Table 1 Lending Volume in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the bank's lending activity.

#### Harrisburg-York-Lebanon CSA

FNB originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings in home mortgage loans and small loans to businesses are weaker than the bank's market share and ranking in deposits.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had \$1.7 billion in deposits with a deposit market share of 7.6 percent. FNB ranked fifth in total deposits out of 26 banks in the AA. FNB originated 702 home mortgage loans and 360 small business loans 2015 through 2017.

According to 2017 peer mortgage data, FNB ranked in the top 6.4 percent of lenders, 30 out of 468 lenders, originating home mortgage loans in the AA. The bank's market share of 1.3 percent and rank in loans is weaker than the bank's deposit market share and rank in deposits. The five largest mortgage lenders have captured 26.2 percent of the market.

According to 2016 peer small business data, FNB is ranked 19 out of 103 lenders, originating small business loans in the AA. The bank's market share of 0.8 percent and rank in loans is weaker than the bank's deposit market share and rank in deposits. The five largest small business lenders have captured 53.6 percent of the market.

#### Johnstown MSA

FNB originated a poor volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings in home mortgage loans and small loans to businesses are weaker than the bank's market share and ranking in deposits.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had \$564 million in deposits with a deposit market share of 19.0 percent. FNB ranked third in total deposits out of 14 banks in the AA. FNB originated 1,124 home mortgage loans and 377 small business loans 2015 through 2017.

According to 2017 peer mortgage data, FNB was the top lender, first out of 140 lenders, originating home mortgage loans in the AA. The bank's market share of 12.0 percent and rank in loans is lower than the bank's deposit market share and rank in deposits. The four largest mortgage lenders have captured 30.8 percent of the market.

According to 2016 peer small business data, FNB is ranked fifth out of 118 lenders, originating small business loans in the AA. The bank's market share of 6.9 percent and rank in loans is weaker than the bank's deposit market share and rank in deposits. The four largest small business lenders have captured 44.3 percent of the market.

### State College MSA

FNB originated a poor volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings in home mortgage loans and small loans to businesses are weaker than the bank's market share and ranking in deposits.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had \$559 million in deposits with a deposit market share of 17.0 percent. FNB ranked second in total deposits out of 16 banks in the AA. FNB originated 657 home mortgage loans and 292 small business loans 2015 through 2017.

According to 2017 peer mortgage data, FNB ranked in the top 1.01 percent of lenders, second out of 198 lenders, originating home mortgage loans in the AA. The bank's market share of 6.49 percent and rank in loans is weaker than the bank's deposit market share and rank in deposits. The five largest mortgage lenders have captured 21.7 percent of the market.

According to 2016 peer small business data, FNB is ranked eighth out of 58 lenders, originating small business loans in the AA. The bank's market share of 4.4 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 51.2 percent of the market.

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

### **Home Mortgage Loans**

The geographic distribution of the bank's home mortgage loan originations and purchases was good.

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

Harrisburg-York-Lebanon CSA

During the 2015 evaluation period, the distribution of home mortgage lending in both LMI geographies was adequate. The proportion of loans was somewhat near to the percentage of owner-occupied housing units in low-income and well below in moderate-income geographies. The proportion of loans was stronger than the aggregate distribution of loans in both LMI geographies. Performance during the 2016 evaluation period was consistent with performance in the prior period and was adequate. An insufficient number of loans were originated or purchased during the 2017 evaluation period to perform a meaningful analysis.

Johnstown MSA

During the 2015 through 2016 evaluation period, there were no low-income census tracts in the AA. The distribution of home mortgage lending in moderate-income geographies was good. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies, and somewhat near to the aggregate distribution of loans in moderate-income geographies. Performance during the 2017 evaluation period was consistent with performance in the prior period and was good.

State College MSA

During the 2015 through 2016 evaluation period, there were no low-income census tracts in the AA. The distribution of home mortgage lending in moderate-income geographies was excellent. The proportion of loans exceeded the percentage of owner-occupied housing units in moderate-income geographies, and somewhat near to the aggregate distribution of loans in those geographies. Performance during the 2017 evaluation period was weaker than performance in the prior period and was good.

**Small Loans to Businesses**

The geographic distribution of the bank's originations and purchases of small loans to businesses was good.

Refer to Table Q in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Harrisburg-York-Lebanon CSA

During the 2015 evaluation period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans exceeded the percentage of businesses in low-income geographies, and was below the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in low-income geographies exceeded the aggregate distribution of loans in those geographies, and was somewhat near to the distribution of loans in moderate-income geographies. Performance during the 2016 evaluation period was consistent with performance in the prior period and was good. Performance during the 2017 evaluation period was stronger than performance in the prior

period and was excellent. The stronger performance did impact conclusions about the bank's performance in the AA.

### Johnstown MSA

During the 2015 through 2016 evaluation period, there were no low-income census tracts. The distribution of small loans to businesses in moderate-income geographies was adequate. The proportion of loans was below the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in moderate-income geographies was below the aggregate distribution of loans in those geographies. Performance during the 2017 evaluation period was consistent with performance in the prior period and was adequate.

### State College MSA

During the 2015 through 2016 evaluation period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans was below the percentage of businesses in low-income geographies, and somewhat near to in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was below the aggregate distribution of loans in those geographies, and exceeded the distribution of loans in moderate-income geographies. Performance during the 2017 evaluation period was weaker than performance in the prior period and was adequate. The weaker performance did not impact conclusions about the bank's performance in the state.

### **Small Loans to Farms**

The geographic distribution of the bank's originations and purchases of small loans to farms is excellent.

Refer to Table S in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

### Harrisburg-York-Lebanon CSA

There were not enough small loans to farms originated during the evaluation period to allow for a meaningful analysis.

### Johnstown MSA

There were not enough small loans to farms originated during the evaluation period to allow for a meaningful analysis.

### State College MSA

During the 2015 through 2016 evaluation period, the distribution of small farms in moderate-income geographies was excellent. There were no low-income census tracts. The proportion of loans exceeded the percentage of farms in moderate-income geographies. The proportion of small farms exceeded the aggregate distribution of loans to small farms in moderate-income

geographies. Performance during the 2017 evaluation period was consistent with performance in the prior period and was excellent.

### **Lending Gap Analysis**

We reviewed summary reports and maps and analyzed FNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

#### **Home Mortgage Loans**

The distribution of the bank's home mortgage loans to LMI borrowers was good.

Table P in the state of Pennsylvania 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.

#### Harrisburg-York-Lebanon CSA

The distribution of the bank's home mortgage lending during the 2015 evaluation period was adequate. The proportion of loans was significantly below the percentage of low-income and well below moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI borrowers. Performance in the 2016 and 2017 evaluation periods was consistent with performance in the prior period and adequate.

The high cost of housing and the need for additional affordable housing significantly impacted the ability to make home mortgage loans to low-income borrowers. These issues were considered when evaluating the bank's performance in the AA. The bank's ability to make mortgage loans is limited by the income levels of low- and moderate-income individuals and families, and the high cost of housing.

#### Johnstown MSA

The distribution of the bank's home mortgage lending during the 2015 through 2016 evaluation period was good. The proportion of loans was well below the percentage of low-income and exceeded moderate-income families, and exceeded the aggregate distribution of loans to those borrowers. Performance in the 2017 evaluation period was consistent with performance in the prior period and good.

#### State College MSA

The distribution of the bank's home mortgage lending during the 2015 through 2016 evaluation period was good. The proportion of loans was significantly below the percentage of low-income and below moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to low-income and somewhat near to moderate-income borrowers. Performance in the 2017 evaluation period was weaker than performance in the prior period

and was adequate. Weaker performance did not impact conclusions about the bank's performance in the state.

The high cost of housing and the need for additional affordable housing significantly impacted the ability to make home mortgage loans to low-income borrowers. These issues were considered when evaluating the bank's performance in the AA. The bank's ability to make mortgage loans is limited by the income levels of low- and moderate-income individuals and families, and the high cost of housing.

### **Small Loans to Businesses**

The borrower distribution of the bank's originations and purchases of small loans to businesses was good.

Refer to Table R in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

#### Harrisburg-York-Lebanon CSA

During the 2015 evaluation period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was below the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. Performance in the 2016 evaluation period was stronger than performance in the prior period and good. Performance in the 2017 evaluation period was consistent with performance in the prior period and was adequate. The performance did not impact conclusions about the bank's performance in the state.

#### Johnstown MSA

During the 2015 through 2016 evaluation period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was below the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. Performance in the 2017 evaluation period was consistent with performance in the prior period and was good.

#### State College MSA

During the 2015-2016 evaluation period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was below the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. There were not enough loans in 2017 to conduct a meaningful analysis.

### **Small Loans to Farms**

The geographic distribution of the bank's originations and purchases of small loans to farms is good.

Refer to Table 12 in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

#### Harrisburg-York-Lebanon CSA

There were not enough small loans to farms originated during the evaluation period to allow for a meaningful analysis.

#### Johnstown MSA

There were not enough small loans to farms originated during the evaluation period to allow for a meaningful analysis.

#### State College MSA

During the 2015 through 2016 evaluation period, the distribution of the bank's small loans to farms by revenue was excellent. The proportion of loans exceeded the percentage of small farms, but exceeded the aggregate distribution of loans to those farms. Performance in the 2017 evaluation period was weaker than performance in the prior period and good. The weaker performance did not impact conclusions about the bank's performance in the state.

### **Community Development Lending**

FNB's level of CD lending in the AA is poor, and had a negative impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs. The bank is inconsistent with its capacity and expertise to conduct specific activities.

Refer to Table 1 Community Development Lending in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table O includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table O does not separately list CD loans.

#### Harrisburg-York-Lebanon CSA

FNB's level of CD lending in the AA is poor, and had a negative impact on lending performance in the AA. The bank's performance is inconsistent with its capacity and expertise to conduct specific activities.

FNB only originated one loan totaling \$2.8 million and representing 1.5 percent of allocated tier 1 capital. The bank's CD loan was responsive in addressing community credit needs, however the single loan is inconsistent with the bank's capacity and expertise to conduct additional activities. The refinance loan was to support renovations on a 72 unit property that provides affordable housing to LMI people.

#### Johnstown MSA

FNB's level of CD lending in the AA is very poor, and had a negative impact on lending performance in the AA. FNB did not originate any CD loans in the AA. The bank's lack of performance is inconsistent with its capacity and expertise to CD lending activities.

### State College MSA

FNB's level of CD lending in the AA is good, and had a positive impact on lending performance in the AA.

FNB originated two loans totaling \$9.5 million and representing 15.5 percent of allocated tier 1 capital. CD loans originated by the bank were adequate in helping address community credit needs. The majority of the loans supported revitalization and stabilization in the AA.

Examples of CD loans originated during the evaluation period include:

- \$4.5 million refinance of a loan to complete additions, renovations, and improvements to a burned out shopping center in State College, PA; and
- \$5 million draw down term loan that was used to support the rehabilitation of blighted properties by the Redevelopment Authority of the Borough of State College.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Erie MSA, Philadelphia-Reading-Camden CSA, and Williamsport MSA was consistent with the bank's overall High Satisfactory performance under the Lending Test in the state. Performance in the Altoona MSA, PA Non-MSA, and Scranton MSA was weaker than the bank's overall performance in the state, and was considered adequate. Weaker performance did not impact conclusions about the bank's performance in the state. Performance in the East Stroudsburg and Lancaster MSAs was also weaker than the bank's overall performance in the state, and was considered poor. Weaker performance was due to the bank's limited presence in these AAs, and did not impact conclusions about the bank's performance in the state.

Refer to the Tables O, P, R, S, and 1 in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

FNB's performance under the investment test in Pennsylvania is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Harrisburg-York-Lebanon CSA and Johnstown MSA is excellent, and adequate in the State College MSA. We considered the investment opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs. Investments across Pennsylvania, including the AAs had a positive impact on overall investment test conclusions.

Refer to Table 14 in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Harrisburg-York-Lebanon CSA

FNB made an excellent level of qualified investments, including grants and donations. While not innovative or complex, these investments exhibited good responsiveness to the credit and CD needs in the AA. Qualified investments totaled \$14.9 million, with current period investments totaling \$10.6 million; prior period investments of \$4.3 million; and \$35 thousand in grants. Investments benefiting the AA during the evaluation represented 7.9 percent of allocated tier 1 capital.

During the evaluation period, the bank invested \$5 million in LIHTC funds benefitting affordable housing needs of the AA. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance of \$365 thousand in five qualifying mortgage backed securities secured by loans to LMI borrowers. An additional remaining balance of \$3.6 million in other qualifying CD investments activities.

All grants made in the AA were to community service organizations that meet the needs of LMI individuals and families by distributing food, providing mentoring services, and offering dental care.

Examples of qualified donations in this AA include:

- \$15 thousand grant to a community service organization that provides free educational programs and services to low-income children. The organization offers after school, preschool, and summer learning programs, as well as a resource center for adult learners. The organization also offers scholarships to help low-income students attend a local private school.
- \$13 thousand donation to an organization that provides mentoring services to children from LMI families.

Johnstown MSA

FNB made an excellent level of qualified investments, including grants and donations. While not innovative or complex, these investments exhibited good responsiveness to the credit and CD needs in the AA. Qualified investments totaled \$8.2 million, with current period investments totaling \$5 million; prior period investments of \$3.2 million; and \$21 thousand in grants. Investments benefiting the AA during the evaluation represented 13.3 percent of allocated tier 1 capital.

During the evaluation period, the bank invested \$5 million in LIHTC funds benefitting affordable housing needs of the AA. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance of \$150 thousand in four qualifying mortgage backed securities secured by loans to LMI borrowers. An additional remaining balance of \$3.0 million in other qualifying CD investments activities.

A majority of the grants were to community service organizations that met the needs of LMI individuals and families in the AA by providing financial assistance, temporary housing, food, and educational programs. Grants were also provided to organizations that engage in economic development in the assessment area.

Examples of qualified donations in this AA include:

- \$14 thousand grant to a community service organization that provides education, job training, and other services to LMI individuals.
- \$3 thousand grant to a community service organization that contributes to workforce and economic development in the AA by motivating students from LMI families to develop the solid work habits required to succeed in school and in their future.
- \$2 thousand grant to an economic development organization that offers various loan programs to small businesses to encourage development of the region and job creation.

### State College MSA

FNB made an adequate level of qualified investments, including grants and donations. While not innovative or complex, these investments exhibited adequate responsiveness to the credit and CD needs in the AA. Qualified investments totaled \$1.2 million, with current period investments totaling \$1 million; prior period investments of \$157 thousand; and \$23 thousand in grants. Investments benefiting the AA during the evaluation represented 1.9 percent of allocated tier 1 capital.

During the evaluation period, the bank invested \$1 million in an SBIC fund benefitting economic development needs of the AA. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance of \$146 thousand in one qualifying mortgage backed securities secured by loans to LMI borrowers. An additional remaining balance of \$10 thousand in other qualifying CD investments activities.

A majority of the grants were to community service organizations that meet the needs of LMI individuals and families in the AA by providing financial assistance and medical services. The bank also made grants to economic development organizations and an affordable housing organization.

Examples of qualified donations in this AA include:

- \$13 thousand grant to community service organization that operates as a free clinic providing access to primary and preventive medical and dental care for LMI residents in the AA.
- \$5 thousand grant to an economic development organization that engages in activities to attract and retain family sustaining jobs in the AA.
- \$2 thousand grant to a community service organization whose mission is to address social and economic needs of low-income residents. Programs include teach budgeting, credit, goal setting and other topics to help build financial independence; financial assistance and temporary housing for LMI families.

### Pennsylvania Statewide

FNB had nine statewide qualified investment with outstanding balance of \$13.5 million from a prior period that had a purpose, mandate or function that serves one or more of the bank's

AAs. Statewide investments included qualifying mortgage backed securities benefiting LMI individuals and an investment with a CDFI loan fund for economic development in several counties. When considering these and other investments in the full- and limited-scope areas, the \$82.5 million of qualified investments in the AAs and across the state represented 10.4 percent of total tier 1 capital.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, FNB's performance under the investment test in the Lancaster MSA, PA Non-MSA, and Scranton MSA is stronger than the Pennsylvania's High Satisfactory performance due to a significantly higher level of outstanding prior period investments relative to tier 1 capital. Stronger performance did impact conclusions about the bank's performance in the state. Performance in the Altoona MSA and Erie MSA is considered good and consistent with the state, and the Philadelphia-Reading-Camden CSA is adequate. Performance in the East Stroudsburg MSA and Williamsport MSA is considered poor, due to the lower level of investments relative to tier 1 capital. Weaker performance did not impact conclusions about the bank's performance in the state.

Refer to the Table 14 in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Pennsylvania is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Harrisburg-York-Lebanon CSA and Johnstown MSA is adequate and in the State College MSA is good.

### **Retail Banking Services**

Refer to Table 15 in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

#### Harrisburg-York-Lebanon CSA

FNB's branch distribution and retail service performance is adequate.

The bank's branches are reasonably accessible to essentially all portions of the Harrisburg-York-Lebanon CSA, and its alternative delivery systems are accessible to essentially all portions of the AA. The bank has 23 branches within the AA, with no branches in low-income CTs and five branches in moderate-income CTs. The percentage of branches in moderate-income CTs are near to the level of population in the moderate-income areas.

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank did not open branches and closed four branches during the evaluation period. The bank acquired 20

branches in February of 2016, resulting in a net increase of 16 branches in the AA. Of the branches acquired, four were located in moderate-income geographies, 13 were located in middle-income geographies, and three were located in upper-income geographies. Of the branches closed, one was located in a low-income geography, one was located in a moderate-income geography, and two were located in upper-income geographies. Three of the closures were due to the acquisition of other branches which were in close proximity, and one branch was closed due to low volume of transactions. The bank uses standard procedures in determining closures, which consider branch traffic and profitability, as well as proximity and accessibility of other branches.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with all branches offering Saturday hours.

### Johnstown MSA

FNB's branch distribution and retail service performance is good.

The bank's branches and alternative delivery systems are accessible to essentially all portions of the AA. The bank has 14 branches within the AA, with no branches in low-income CTs and five branches in moderate-income CTs. The absence of branches in low-income CTs is mitigated by the very low percentage (1.8 percent) of the AA population in those CTs. The percentage of branches in moderate-income CTs exceeds the level of population in the moderate-income areas.

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed two branches in the AA, both located in middle-income geographies. The bank closed both branches due to profitability and were ultimately consolidated with another branch. The bank uses standard procedures in determining closures, which consider branch traffic and profitability, as well as proximity and accessibility of other branches.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with most branches offering Saturday hours.

### State College MSA

FNB's branch distribution and retail service performance is excellent.

The bank's branches and alternative delivery systems are readily accessible to all portions of the State College MSA. The bank has 13 branches within the AA, with no branches in low-income CTs and four branches in moderate-income CTs. The absence of branches in low-income CTs is mitigated by the low percentage (3.3 percent) of the AA's population in those CTs. The percentages of branches in moderate-income CTs exceeds the level of population in the moderate-income areas.

During the assessment period, three low-income CTs designated in 2016 transitioned to CTs without a designated income level in 2017. The bank had three branches that were located in low-income geographies for a majority of the assessment period, and continue to serve LMI individuals. We evaluated several factors to determine that these branches served LMI individuals in these geographies. This included the likelihood that the areas surrounding the branches offered residents and businesses of the nearby low- or moderate-income geographies additional amenities or public services, such as post offices, grocery stores, strip malls, or “big box” stores. Finally, we reviewed maps comparing branch locations to demonstrate these branches were serving individuals and businesses in the low- and moderate-income geographies. This demonstrates the bank’s ability to reach low-income areas and customers with the bank’s current branch distribution.

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened one branch in a low-income geography and closed two branches in moderate- and middle-income geographies, resulting in a net decrease of one branch in the State College MSA. The bank closed the two branches due to lack of profitability and because they were located in areas with declining or no growth opportunities. The bank uses standard procedures in determining closures, which consider branch traffic and profitability, as well as proximity and accessibility of other branches.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours.

## **Community Development Services**

FNB’s performance in providing community development services in the state of Pennsylvania is poor.

### Harrisburg-York-Lebanon CSA

Based on the level of CD services in the Harrisburg-York-Lebanon CSA, we concluded the provision of CD service is very poor. The bank provided a limited level of CD services in this AA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted a very limited number of CD services, which is inconsistent with its capacity and expertise to conduct specific activities.

FNB employees provided technical assistance to four different CD organizations, totaling 32 hours. The bank had four employees provide outreach in the AA. FNB staff served on boards of organizations that provide affordable housing and community services targeted to LMI individuals and families.

Examples of these services include:

- An employee provided home-buyer education instruction through a HUD certified counseling agency, which offers first time homebuyer education workshops, landlord/tenant counseling, and debt and budget counseling.
- An employee served on the board of a housing and redevelopment organization, which creates quality, affordable housing and sustainable development opportunities which revitalize and strengthen the community.

### Johnstown MSA

Based on the level of CD services in the Johnstown MSA, we concluded the provision of CD service is very poor.

The bank conducted minimal CD services, inconsistent with its capacity and expertise to conduct specific activities.

FNB employee provided technical assistance by serving on the board to one CD organization. The organization provides community services to LMI individuals and families. The organization is a nonprofit agency that promotes services for the purpose of eliminating poverty through a wide variety of county programs.

### State College MSA

Based on the level of CD services in the State College MSA, we concluded the provision of CD service is poor.

The bank conducted a limited number of CD services, inconsistent with its capacity and expertise to conduct specific activities.

FNB employees provided technical assistance to two different CD organizations, totaling 84 hours during 2015. The bank had two employees that provided outreach in the AA. FNB staff served on boards of organizations that provide affordable housing and community services targeted to LMI individuals and families. The bank did not provide any CD services in the State College MSA for the remainder of the evaluation period after 2015.

Examples of these services include:

- An employee served as board of a community organization, which provides medical and dental care, case management and necessary medications at no cost to qualified uninsured and underinsured county residents.
- An employee served as board of an affordable housing organization, which provided decent homeownership in partnership with volunteers and community support.

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

Based on limited-scope reviews, the bank's performance under the service test in the Erie MSA, Lancaster MSA, and Williamsport MSA is much stronger than the bank's overall performance in the state. Performance in the Pennsylvania Non-MSA and Scranton MSA is stronger than the bank's overall performance in the state, and is considered excellent. Stronger performance is due to the branch distribution in LMI geographies that exceeds the

percentages of the population residing in those geographies. Stronger performance did impact conclusions about the bank's performance in the state. Performance in the East Stroudsburg MSA and Philadelphia-Reading-Camden CSA is consistent with the bank's overall Low Satisfactory performance under the service test in Pennsylvania, and is considered adequate. Performance in the Altoona MSA is weaker than the bank's overall performance in the state, and is considered poor. Weaker performance in the Altoona MSA is due to the bank's percentage of branches in LMI geographies being below the percentages of the population residing in LMI geographies. Weaker performance did not impact conclusions about the bank's performance in the state.

Refer to Table 1 and 15 in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

## State of South Carolina

### CRA Rating for South Carolina<sup>8</sup>: Needs to Improve

The lending test is rated: Needs to Improve

The investment test is rated: Low Satisfactory

The service test is rated: Needs to Improve

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs, taking into account the number and amount of home mortgage and small business.
- FNB's distribution of loans among geographies of different income levels was good, based upon excellent home mortgage lending and poor small business lending.
- FNB's distribution of loans to individuals and businesses of different income levels was good, based upon good home mortgage lending and good small business lending.
- The bank made no community development loans.
- The bank's branches and alternative delivery systems are accessible to limited portions of the AA.
- The bank provides a limited level of community development services.

## Description of Bank's Operations in South Carolina

FNB's consisted of consisted of one AA in the state of South Carolina. The SC Non-MSA AA is comprised of the complete county of Cherokee, SC. FNB's branch presence in the state of South Carolina began March 1, 2017 through acquisition activity.

Based on FDIC Deposit Market Share data as of June 30, 2017, FNB had a 0.1 percent deposit market share in the state and is ranked 56 out of 82 financial institutions doing business in the rating area. The bank made 0.05 percent of its total evaluation period HMDA and CRA loans in the state. Primary competitors include Wells Fargo Bank, National Association, which is ranked first in deposit market share (20.1 percent) with 139 offices, Bank of America, National Association, which ranked second in deposit share (15.0 percent) with 75 offices, and Branch Banking and Trust Company, which ranked third in deposit share (9.7 percent) with 106 offices.

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<sup>8</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

FNB provides a full-range of loan and deposit products and services in the AA through two full-service branches, which are located in middle-income geographies.

Refer to the community profiles for the state of South Carolina in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## **Scope of Evaluation in South Carolina**

The SC Non-MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. The evaluation period start date was March 1, 2017 in the rating area for all reportable activity.

The rating is based on results of the full-scope area. Please see appendix A for more information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA**

### **LENDING TEST**

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

The bank's performance under the lending test in South Carolina is rated Need to Improve. Based on full-scope reviews, the bank's lack of lending performance in the SC Non-MSA is very poor; however, performance is considered to be poor because of the bank's limited time in the state and the bank's limited presence in the AA as of the evaluation period. We also considered the very strong competition for lending in the AA from nationwide institutions and the large industrial loan banks in the AA. These institutions have much greater capacity and expertise.

#### **Lending Activity**

Refer to Tables 1 Lending Volume in the state of South Carolina section of appendix D for the facts and data used to evaluate the bank's lending activity.

#### **SC Non-MSA**

FNB originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

FNB's market share and ranking in home mortgage loans is weaker than the bank's market share and ranking in deposits. Based on FDIC market share data as of June 30, 2017, FNB had \$85.6 million in deposits with a deposit market share of 16.8 percent. FNB ranked third in total deposits out of seven banks in the AA. FNB originated seven home mortgage loans and 12 small business loans in 2017.

According to 2017 peer mortgage data, FNB ranked in the top 25 percent of lenders, 25 out of 113 lenders, originating home mortgage loans in the AA. FNB's mortgage market share of 0.9 percent is strong than their overall deposit market share. The five largest mortgage lenders have captured 40.3 percent of the market.

Analysis of the bank's small business lending level cannot be performed. The most recent peer data is from 2016, prior to FNB's entrance into the AA.

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

### **Home Mortgage Loans**

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

#### SC Non-MSA

FNB did not originate or purchase enough home mortgage loans during 2017 to enable a meaningful analysis of the bank's performance. There were no low-income census tracts.

### **Small Loans to Businesses**

Refer to Table Q in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

#### SC Non-MSA

FNB did not originate or purchase enough small loans to businesses during 2017 to enable a meaningful analysis of the bank's performance. There were no low-income census tracts.

### **Lending Gap Analysis**

We reviewed summary reports and maps and analyzed FNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

### **Home Mortgage Loans**

Table P in the state of South Carolina 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.

#### SC Non-MSA

FNB did not originate or purchase enough home mortgage loans during 2017 to enable a meaningful analysis of the bank's performance.

### **Small Loans to Businesses**

Refer to Table R in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

### **SC Non-MSA**

FNB did not originate or purchase enough small loans to businesses during 2017 to enable a meaningful analysis of the bank's performance.

### **Community Development Lending**

FNB's level of CD lending in the AA is poor, and had a neutral impact on lending performance in the AA. In addition to considering the bank's absence of CD lending, we also considered the bank's length of time in the state when assessing its performance and any impact on the Lending Test rating. We also considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to Table 1 Community Development Lending in the state of South Carolina section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table O includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table O does not separately list CD loans.

### **SC Non-MSA**

FNB's level of CD lending in the AA is poor, and had a neutral impact on lending performance in the AA. FNB did not originate any CD loans in the AA. The bank's lack of CD lending has a neutral impact on the Lending Test rating because of the bank's limited time in the AA. We also considered the very strong competition for CD lending in the AA from nationwide institutions and the large industrial loan banks in the AA. These institutions have much greater capacity and expertise to secure qualifying loans.

## **INVESTMENT TEST**

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

FNB's performance under the investment test in South Carolina is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the SC Non-MSA is poor. We considered the investment opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs. Investments across South Carolina, including the AAs had a positive impact on overall investment test conclusions.

Refer to Table 14 in the state of South Carolina section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### SC Non-MSA

FNB made a poor level of qualified investments. The bank did not have any qualified investments or grants with in the AA. The absence of investments is mitigated by the bank's limited amount of time in the state.

### South Carolina Statewide

FNB had two prior period statewide investments that had a purpose, mandate, or function that serve the bank's AA with a book value of \$1 million outstanding through the evaluation period. Statewide investments included qualifying mortgage backed securities benefiting LMI borrowers. The prior period investments were part of the acquisition the bank made and are still outstanding, which continue to benefit the assessment area. The \$1 million of qualified investments across the state represented 10.9 percent of total tier 1 capital.

### Regional or Nationwide

FNB made five investments totaling \$7.6 million in four qualifying mortgage backed securities that benefitted LMI individuals across North Carolina and South Carolina.

## **SERVICE TEST**

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

The bank's performance under the service test in South Carolina is rated Needs to Improve. Based on full-scope reviews, the bank's performance and the limited time in the SC Non-MSA is poor.

### **Retail Banking Services**

Refer to Table 15 in the state of South Carolina section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### SC Non-MSA

FNB's branch distribution and retail service performance is poor when considering the limited time the bank was in the AA.

The bank's branches and alternative delivery systems are accessible to limited portions of the South Carolina Non-MSA. The bank has one branch in the AA with no branches in low- or moderate CTs.

The opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. In March 2017, the bank

entered into the market through an acquisition. It consisted of two branches in the AA, both of which are located in middle-income geographies.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, and do not offer Saturday hours.

### **Community Development Services**

FNB's performance in providing community development services in the state of South Carolina is poor.

#### **SC Non-MSA**

Based on the level of CD services in the SC Non-MSA, we concluded the provision of CD service is poor. The bank provided no CD services in the AA.

CD services were not effective and responsive in helping the bank address community needs. The bank conducted no CD services, consistent with its capacity and expertise to conduct specific activities.

## 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/2015 to 12/31/2017 Investment and Service Tests and CD Loans: 01/01/2015 to 12/31/2017*	
<b>Financial Bank</b>	<b>Products Reviewed</b>	
First National Bank of Pennsylvania (FNB) Pittsburgh, PA	Home Purchase, Home Improvement, Home Refinance, Multifamily, Small Business Small Farm, and CD loans; Qualified Investments; and CD Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Regency Finance Company (RFC)  First National Insurance Agency (FNIA)  F.N.B. Capital Corporation, LLC (FNBCC)	Holding Company	Community Development investments
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Charlotte-Concord-Gastonia, NC-SC MMSA*	Full-Scope	Iredell, Mecklenburg, Rowan, Union, and York Counties
Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA	Full-Scope	Allegheny, Armstrong, Beaver, Brooke, Butler, Fayette, Jefferson, Washington, and Westmoreland Counties
Youngstown-Warren-Boardman, OH-PA MMSA	Full-Scope	Mahoning, Trumbull, and Mercer Counties
State of Maryland Washington-Baltimore-Arlington CSA	Full-Scope	Ann-Arundel, Baltimore, Harford, Howard, Queen Anne's, Baltimore City, and Montgomery Counties
State of North Carolina* Greensboro-Winston Salem-High Point CSA	Full-Scope	Guilford, Rockingham, Alamance, Davidson, Forsyth, Stokes, and Yadkin Counties

Raleigh-Durham-Chapel Hill CSA	Full-Scope	Johnston, Wake, Durham, and Orange Counties Cumberland County*
Fayetteville MSA	Limited-Scope	Pitt County*
Greenville MSA	Limited-Scope	Onslow County*
Jacksonville MSA	Limited-Scope	Brunswick County*
Myrtle Beach MSA	Limited-Scope	Ashe, Avery, Beaufort, Dare, Hyde, Lee, Martin, Moore, Perquimans, Surry, Tyrrell, Washington, Watauga, and Wilkes Counties*
NC Non-MSA	Limited-Scope	
Wilmington MSA	Limited-Scope	New Hanover and Pender Counties*
State of Ohio		
Cleveland-Akron-Canton CSA	Full-Scope	Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, and Summit Counties
Wheeling MSA	Limited-Scope	Belmont County
State of Pennsylvania		
Harrisburg-York-Lebanon CSA	Full-Scope	Cumberland, Dauphin, York, and Lebanon (added Feb 2016) Counties
Johnstown MSA	Full-Scope	Cambria County
State College MSA	Full-Scope	Centre County
Altoona MSA	Limited-Scope	Blair County
East Stroudsburg MSA	Limited-Scope	Monroe County
Erie MSA	Limited-Scope	Erie County
Lancaster MSA	Limited-Scope	Lancaster County
PA Non-MSA	Limited-Scope	Bedford, Clinton, Crawford, Greene, Huntingdon, Indiana, Juniata, Lawrence, Mifflin, Northumberland, Schuylkill, Snyder, Somerset, Susquehanna, Union, and Venango Counties
Philadelphia-Reading-Camden CSA	Limited-Scope	Chester and Berks Counties
Scranton MSA	Limited-Scope	Lackawanna, Luzerne, Wyoming Counties
Williamsport MSA	Limited-Scope	Lycoming County
State of South Carolina*		
SC Non-MSA	Full-Scope	Cherokee County

\* The analysis period for the AA was March 1, 2017 through December 31, 2017.

## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS: First National Bank of Pennsylvania (FNB)				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank Rating
FNB	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
<b>Multistate Metropolitan Area:</b>				
Charlotte-Concord-Gastonia, NC-SC	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Pittsburgh-Weirton-Steubenville, PA-OH-WV	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Youngstown-Warren-Boardman, OH-PA	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
<b>State:</b>				
Maryland	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
North Carolina	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Ohio	Low Satisfactory	Outstanding	Needs to Improve	Satisfactory
Pennsylvania	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
South Carolina	Needs to Improve	Low Satisfactory	Needs to Improve	Needs to Improve

\* The lending test is weighted more heavily than the investment and service tests in the overall rating.

## Appendix C: Community Profiles for Full-Scope Areas

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<b>MULTISTATE METROPOLITAN AREA RATING .....</b>	<b>C-2</b>
Charlotte-Concord-Gastonia, NC-SC MMSA.....	C-2
Pittsburgh-Weirton CSA .....	C-5
Youngstown-Warren-Boardman MMSA.....	C-8
<b>STATE RATING .....</b>	<b>C-11</b>
State of Maryland .....	C-11
State of North Carolina .....	C-15
State of Ohio .....	C-21
State of Pennsylvania .....	C-24
State of South Carolina .....	C-34

## Multistate Metropolitan Area Rating

### Charlotte-Concord-Gastonia, NC-SC MMSA

Table A – Demographic Information of the Assessment Area						
2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	459	9.4	26.6	31.6	31.4	1.1
Population by Geography	1,957,020	8.1	25.5	32.3	33.8	0.4
Housing Units by Geography	805,518	8.2	26.1	32.5	33.1	0.1
Owner-Occupied Units by Geography	470,799	3.6	21.3	35.8	39.3	0.0
Occupied Rental Units by Geography	261,691	15.4	33.2	26.9	24.4	0.2
Vacant Units by Geography	73,028	12.4	31.3	31.1	25.0	0.2
Businesses by Geography	134,204	7.8	21.3	27.1	42.9	0.9
Farms by Geography	3,324	4.2	19.6	44.8	31.1	0.3
Family Distribution by Income Level	489,317	22.5	16.8	18.6	42.1	0.0
Household Distribution by Income Level	732,490	23.5	16.1	17.4	43.1	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$64,993	Median Housing Value			\$189,310
FFIEC Adjusted Median Family Income for 2017 Charlotte-Concord-Gastonia, NC-SC MMSA		\$67,700	Median Gross Rent			\$900
			Families Below Poverty Level			11.3%

Source: 2010 U.S. Census & 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.

The Charlotte-Concord-Gastonia, NC-SC MMSA is comprised of the complete counties of Iredell, Mecklenburg, Rowan, and Union in North Carolina and York in South Carolina. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 459 CTs of which 43 are low- income and 122 are moderate-income.

FNB has 16 full-service branches and 16 deposit-taking ATMs in the AA. As of June 30, 2017, FNB had a 0.4 percent deposit market share in the AA and is ranked eight out of 35 financial institutions doing business in the AA. The bank's three major competitors are Bank of America, National Association, which ranked first in deposit market share (74.8 percent) with 61 offices, Wells Fargo Bank, National Association, which ranked second in deposit share (15.0 percent) with 91 offices, and Branch Banking and Trust Co., which ranked third in deposit share (3.0 percent) with 70 offices.

The 2017 FFIEC adjusted median family income for the AA was \$67,700. Low-income families in the AA, earned median annual income of \$33,850 or less, and moderate-income families earned an annual income of \$33,851 to \$54,160.

### **Employment Factors**

According to the U.S. Bureau of Labor and Statistics, as of December 2017 the unemployment rate in the AA was 4.2 percent, down from 4.5 percent in March 2017. The national unemployment as of December was 4.1 percent, and 4.5 percent for the state of North Carolina. According to the U.S. Census Bureau's American Community Survey, the percentage of families living below the poverty level was 11.3 percent, compared to 9.8 percent across all of the bank's combined AAs.

### **Housing Characteristics**

According to the 2010 U.S. Census, 61.4 percent of the total housing units in the AA were owner occupied, and 28.8 percent are rental occupied units. Additionally, 3.3 percent of all owner occupied units and 13.9 percent of renter occupied units were located in low-income CTs. Furthermore, 6.2 percent of all single family (1-4 unit) homes and 13.4 percent of multifamily (5 plus unit) housing units were located in low-income tracts. In addition, 18.5 percent of all owner occupied units and 30.4 percent of renter occupied units were located in moderate-income CTs. Furthermore, 21.0 percent of all single family (1-4 unit) homes and 27.9 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. According to the 2010 U.S. Census, the median housing value was \$189,310 and the median monthly gross rent \$900.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$33,850 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$157,641 mortgage with a payment of \$846 per month. A moderate-income borrower making \$54,160 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$252,225 mortgage with a payment of \$1,354 per month. The median housing value in the AA was \$208,313 and \$325,050 in 2015 and 2017, reflecting a percent change of 56.04 percent from 2015 to 2017 according to Realtor.com data. This illustrates that both low-income borrowers and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,745.

### **Economic Conditions**

According to Moody's Analytics, key economic drivers in the AA are finance and manufacturing.

Major employers include Atrium Health, Wells Fargo Bank, National Association, Walmart, and Bank of America, National Association. Employment growth has slowed modestly from its peak, but remains stellar at nearly double the state and national rates.

Most of the gains are with private sector business/professional providers and the government. Housing demand fueled by strong demographics have resulted in significant upward pressure on housing prices.

### **Community Contacts**

We reviewed discussions with two community contacts located in the AA that occurred in 2017. One contact represented an affordable housing organization. According to the contact, the inventory of middle- and upper-income housing, both rental and homeownership, continues to increase in Charlotte. Average rents increase as a result, pricing out low- and moderate-income renters whose incomes have remained flat or decreased in recent years. LIHTC has become increasingly more competitive statewide in part as state government is cutting state tax credits for that purpose.

Another contact represented an economic development organization. The outer counties in the MSA have experienced mixed economic development progress. Those communities nearest to Charlotte have seen business investment and increased volume of housing development though at the higher end of the income range. Those portions of the counties furthest away from Charlotte have not benefited to the same extent. These communities remain more tied to a rural economy more dependent on agriculture and less attractive to regional developers and residents. Leadership for local economic development tends to come from local and community banks. The larger banks provide considerable leadership and financing for affordable housing development projects.

## Pittsburgh-Weirton CSA

Table A – Demographic Information of the Assessment Area						
2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	740	6.5	25.4	46.4	19.9	1.9
Population by Geography	2,450,063	4.1	21.0	48.9	25.6	0.4
Housing Units by Geography	1,145,830	4.7	23.4	49.2	22.7	0.0
Owner-Occupied Units by Geography	731,137	2.1	18.8	52.1	27.0	0.0
Occupied Rental Units by Geography	293,202	8.7	30.4	44.8	16.0	0.0
Vacant Units by Geography	121,491	10.8	34.5	42.0	12.6	0.1
Businesses by Geography	165,224	4.3	16.3	47.7	31.0	0.6
Farms by Geography	3,976	1.3	13.9	59.3	25.4	0.1
Family Distribution by Income Level	644,793	20.3	18.1	21.9	39.6	0.0
Household Distribution by Income Level	1,024,339	24.9	15.9	17.3	42.0	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$62,376	Median Housing Value			\$122,297
Median Family Income MSA - 48260 Weirton-Steubenville, WV-OH MSA		\$48,367	Median Gross Rent			\$651
			Families Below Poverty Level			8.3%

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						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	740	8.4	24.2	44.7	20.7	2.0
Population by Geography	2,450,644	4.9	20.3	48.6	25.8	0.5
Housing Units by Geography	1,148,206	5.7	22.1	48.6	23.4	0.1
Owner-Occupied Units by Geography	718,251	2.6	17.4	51.9	28.0	0.0
Occupied Rental Units by Geography	311,259	10.5	29.4	43.2	16.6	0.3
Vacant Units by Geography	118,696	11.8	31.7	42.9	13.3	0.2
Businesses by Geography	163,284	4.7	16.4	43.5	34.7	0.7
Farms by Geography	4,025	1.9	13.4	59.1	25.5	0.0
Family Distribution by Income Level	636,496	21.1	17.5	20.6	40.8	0.0
Household Distribution by Income Level	1,029,510	25.2	15.5	17.1	42.3	0.0

Median Family Income MSA - 38300 Pittsburgh, PA MSA	\$69,624	Median Housing Value	\$134,952
Median Family Income MSA - 48260 Weirton-Steubenville, WV-OH MSA	\$52,770	Median Gross Rent	\$746
FFIEC Adjusted Median Family Income for 2017 Pittsburgh-Weirton CSA	\$72,200	Families Below Poverty Level	8.6%
<i>Source: 2010 U.S. Census &amp; 2015 ACS Census and 2017 D&amp;B Data</i>			
<i>Due to rounding, totals may not equal 100.0</i>			
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

The Pittsburgh-Weirton CSA (Pittsburgh, PA MSA and Weirton-Steubenville, WV MSA) is comprised of the complete counties of Alleghany, Armstrong, Beaver, Butler, Fayette, Indiana, Lawrence, Washington, and Westmoreland, in Pennsylvania; Brooke County in West Virginia; and Jefferson County in Ohio. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 740 CTs of which 62 are low-income and 179 are moderate-income.

FNB has 95 full-service branches and 108 deposit-taking ATMs in the AA. As of June 30, 2017, FNB had a 4.8 percent deposit market share in the AA and is ranked fifth out of 58 financial institutions in the Pittsburgh CSA. The bank's major competitors are PNC Bank, National Association, which ranked first in deposit market share (42.4 percent) with 144 offices, Bank of NY Mellon, which ranked second in deposit market share (14.0 percent) with two offices, BNY Mellon, which ranked third in deposit market share (9.1 percent) with one office, and Bank of America, National Association, which ranked number four in deposit market share (7.0 percent) with 121 offices.

The 2017 FFIEC adjusted median family income for the AA was \$72,200. Low-income families in the AA, earned median annual income of \$36,100 or less, and moderate-income families earned an annual income of \$36,101 to \$57,760.

### **Employment Factors**

According to the U.S. Bureau of Labor and Statistics, as of December 2017 the unemployment rate in the Pittsburgh MSA was 4.9 percent, down from 5.3 percent in January 2015. The national unemployment as of December 2017 was 4.1 percent, and 4.8 percent for the state of Pennsylvania. According to the U.S. Census Bureaus' American Community Survey, the percentage of families living below the poverty level was 8.6 percent, compared to 9.8 percent across all of the bank's combined AAs.

### **Housing Characteristics**

According to the 2010 U.S. Census, 63.8 percent of the total housing units in the AA were owner occupied, and 25.6 percent are rental occupied units. Additionally, 2.1 percent of all owner occupied units and 8.7 percent of renter occupied units were located in low-income CTs. Furthermore, 4.3 percent of all single family (1-4 unit) homes and 9.0 percent of multifamily (5 plus unit) housing units were located in low-

income tracts. In addition, 18.9 percent of all owner occupied units and 30.4 percent of renter occupied units were located in moderate-income CTs. Furthermore, 23.3 percent of all single family (1-4 unit) homes and 23.6 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. According to the 2010 U.S. Census, the median housing value was \$134,952 and the median monthly gross rent \$746.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$36,100 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$168,119 mortgage with a payment of \$903 per month. A moderate-income borrower making \$57,760 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$268,991 mortgage with a payment of \$1,444 per month. The median housing value in the AA was \$139,750 and \$169,950 in 2015 and 2017 reflecting a percent change of 21.6 percent from 2015 to 2017 according to Realtor.com data. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$912.

### **Economic Conditions**

According to Moody's Analytics, key economic drivers in the Pittsburgh MSA are finance, healthcare, and energy. Major employers include UPMC Health System and Highmark Inc. A turnaround in the energy industry has helped fuel recent economic growth after several years of lackluster growth. Key economic drivers in the Weirton-Steubenville MSA are healthcare, manufacturing and logistics. Major employers include Trinity Medical Center, Mountaineer Park Inc., and Weirton Medical Center. The economy in this MSA is challenged by on-going struggles in manufacturing (e.g. collapse in steel industry) and persistent population losses.

### **Community Contacts**

We reviewed discussions with two community contacts located in the AA that occurred in 2017. One contact represented a government planning agency in the Pittsburgh market. Key concerns are the lack of available workers due to a declining and aging population, and the lack of quality affordable homes. The contact suggested that banks could be more engaged with promoting and utilizing specific products to facilitate the rehabilitation of older homes.

The other contact represents a coalition of community reinvestment groups focused on the revitalization of the Pittsburgh region and western Pennsylvania. In addition to the need for financing of housing rehabilitation, there is also a need for small dollar consumer loans, less stringent credit standards for consumers, and easier access to credit for small businesses.

## Youngstown-Warren-Boardman, OH-PA MMSA

Table A – Demographic Information of the Assessment Area						
2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	155	10.3	21.9	51.0	16.8	0.0
Population by Geography	565,773	6.5	16.1	55.3	22.2	0.0
Housing Units by Geography	260,391	7.6	18.0	54.3	20.1	0.0
Owner-Occupied Units by Geography	171,214	4.2	13.4	58.1	24.2	0.0
Occupied Rental Units by Geography	60,954	12.2	26.1	48.3	13.3	0.0
Vacant Units by Geography	28,223	18.1	28.4	43.6	9.9	0.0
Businesses by Geography	29,828	6.5	12.9	50.9	29.7	0.0
Farms by Geography	1,192	1.8	5.2	70.8	22.2	0.0
Family Distribution by Income Level	151,238	20.1	18.0	22.3	39.6	0.0
Household Distribution by Income Level	232,168	24.1	16.4	18.0	41.6	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$52,933	Median Housing Value			\$100,929
			Median Gross Rent			\$584
			Families Below Poverty Level			11.5%

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						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	155	14.2	20.0	45.8	20.0	0.0
Population by Geography	556,243	8.7	15.4	50.3	25.7	0.0
Housing Units by Geography	258,796	9.3	16.6	49.6	24.5	0.0
Owner-Occupied Units by Geography	161,805	5.1	12.5	53.0	29.3	0.0
Occupied Rental Units by Geography	68,359	14.5	23.7	44.7	17.0	0.0
Vacant Units by Geography	28,632	20.5	22.6	42.0	14.9	0.0
Businesses by Geography	29,810	8.0	12.7	44.3	34.9	0.0
Farms by Geography	1,195	2.2	6.0	56.8	35.0	0.0
Family Distribution by Income Level	146,502	20.5	18.4	20.6	40.5	0.0
Household Distribution by Income Level	230,164	23.9	16.1	18.0	42.0	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$55,174	Median Housing Value			\$98,762

FFIEC Adjusted Median Family Income for 2017 Youngstown MMSA	\$55,800	Median Gross Rent	\$630
		Families Below Poverty Level	12.7%
<i>Source: 2010 U.S. Census &amp; 2015 ACS Census and 2017 D&amp;B Data            Due to rounding, totals may not equal 100.0            (*) The NA category consists of geographies that have not been assigned an income classification.</i>			

The Youngstown MMSA (Youngstown-Warren-Boardman, OH-PA MMSA) is comprised of the complete counties of Mahoning, and Trumbull in Ohio, and Mercer in Pennsylvania. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 155 CTs of which 22 are low- income and 31 are moderate-income.

FNB has 19 full-service branches and 28 deposit-taking ATMs in the AA. As of June 30, 2017, FNB had a 12.4 percent deposit market share in the AA and is ranked second out of 19 financial institutions doing business in the Youngstown MMSA. The bank's major competitors are Huntington National Bank, which ranked first in deposit share (21.3 percent) with 39 offices, and PNC Bank, National Association, which ranked third in deposit share (12.2 percent) with 20 offices.

The 2017 FFIEC adjusted median family income for the AA was \$55,800. Low-income families in the AA, earned median annual income of \$27,900 or less, and moderate-income families earned an annual income of \$27,901 to \$44,640.

### Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2017 the unemployment rate in the Youngstown MMSA was 6.1 percent, which was unchanged from January 2015. The national unemployment as of December 2017 was 4.1 percent, and 4.9 percent for the state of Ohio, and 4.8 percent for the state of Pennsylvania. According to the U.S. Census Bureaus' American Community Survey, the percentage of families living below the poverty level was 12.7 percent, compared to 9.8 percent across all of the bank's combined AAs.

### Housing Characteristics

According to the 2010 U.S. Census, 65.8 percent of the total housing units in the AA were owner occupied, and 23.4 percent are rental occupied units. Additionally, 4.2 percent of all owner occupied units and 12.2 percent of renter occupied units were located in low-income CTs. Furthermore, 7.6 percent of all single family (1-4 unit) homes and 10.3 percent of multifamily (5 plus unit) housing units were located in low-income tracts. In addition, 13.4 percent of all owner occupied units and 26.1 percent of renter occupied units were located in moderate-income CTs. Furthermore, 17.7 percent of all single family (1-4 unit) homes and 23.7 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. According to the 2010 U.S. Census, the median housing value was \$98,762 and the median monthly gross rent \$630.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$27,900 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$129,931 mortgage with a payment of \$698 per month. A moderate-income borrower making \$44,640 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$207,890 mortgage with a payment of \$1,116 per month. The median housing value in the AA was \$81,700 and \$107,050 in 2015 and 2017 reflecting a percent change of 31.03 percent from 2015 to 2017 according to Realtor.com data, but still affordable to low- and moderate-income borrowers. This illustrates that neither low-income borrowers nor moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$575.

### **Economic Conditions**

According to Moody's Analytics, key economic drivers in the Youngstown MSA are manufacturing and healthcare. Major employers include General Motors Inc., Mercy Health, and Valley Healthcare Systems. For the past two years, the economy in this MSA has been one of the weakest in Ohio, and spiraling downward. The shrinking population and weaknesses in manufacturing have negatively impacted new job growth and overall employment. Home sales and growth in new homes and investments have been sluggish. The economy is expected to underperform for several years going forward.

### **Community Contacts**

We reviewed discussions with community representatives from another CRA performance evaluation conducted during the same time period. The representatives described the following concerns/community needs in the Youngstown MSA:

- Living wage jobs;
- Large inventory of vacant properties; foreclosures and abandoned bank-owned properties;
- Quality, energy efficient, affordable homes and rental units;
- Rehab loans when purchasing homes;
- Transitional and permanent supportive housing; and,
- Financial Literacy, homeownership counseling, and foreclosure prevention.

## State Rating

## State of Maryland

## Washington-Baltimore-Arlington CSA

Table A – Demographic Information of the Assessment Area						
2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	858	13.2	24.0	31.8	29.8	1.2
Population by Geography	3,515,132	10.0	23.3	33.8	32.6	0.4
Housing Units by Geography	1,432,726	11.3	24.4	33.8	30.5	0.0
Owner-Occupied Units by Geography	887,389	5.2	18.8	37.0	38.9	0.0
Occupied Rental Units by Geography	424,601	19.0	35.1	29.1	16.8	0.0
Vacant Units by Geography	120,736	29.2	27.7	26.1	17.1	0.0
Businesses by Geography	244,792	6.1	18.4	34.0	41.3	0.2
Farms by Geography	4,745	2.4	11.0	37.4	49.1	0.0
Family Distribution by Income Level	864,086	21.5	17.3	20.7	40.5	0.0
Household Distribution by Income Level	1,311,990	23.7	16.3	18.4	41.6	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$81,788	Median Housing Value			\$347,500
Median Family Income MSA - 43524 Silver Spring-Frederick-Rockville, MD MD		\$107,887	Median Gross Rent			\$1,139
			Families Below Poverty Level			6.0%

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.

Table A – Demographic Information of the Assessment Area						
2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	858	12.1	23.3	31.8	31.0	1.7
Population by Geography	3,620,233	9.0	22.7	33.7	33.8	0.7
Housing Units by Geography	1,465,506	10.2	23.4	34.4	31.8	0.3
Owner-Occupied Units by Geography	880,001	4.7	17.9	36.2	41.2	0.1
Occupied Rental Units by Geography	461,542	16.3	32.9	32.9	17.3	0.6
Vacant Units by Geography	123,963	25.9	27.1	26.9	19.3	0.8

Businesses by Geography	256,128	5.2	17.1	35.3	41.8	0.6
Farms by Geography	5,078	2.1	14.0	34.9	48.9	0.1
Family Distribution by Income Level	884,383	22.4	16.9	19.6	41.1	0.0
Household Distribution by Income Level	1,341,543	24.6	15.8	17.6	42.1	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA	\$87,788	Median Housing Value			\$324,250	
Median Family Income MSA - 43524 Silver Spring-Frederick-Rockville, MD MD	\$112,655	Median Gross Rent			\$1,313	
FFIEC Adjusted Median Family Income for 2017 Washington-Baltimore-Arlington CSA	\$91,100	Families Below Poverty Level			6.9%	
<i>Source: 2010 U.S. Census &amp; 2015 ACS Census and 2017 D&amp;B Data            Due to rounding, totals may not equal 100.0            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Washington-Baltimore-Arlington CSA (Baltimore-Towson MSA and Silver Spring-Frederick-Rockville MD) is comprised of the complete counties of Ann-Arundel, Baltimore, Baltimore City, Harford, Howard, Montgomery, and Queen Anne's in Maryland. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 858 CTs of which 103 are low- income and 200 are moderate-income.

FNB has 31 full-service branches and 34 deposit-taking ATMs in the AA. As of June 30, 2017, FNB had a 1.3 percent deposit market share in the AA and is ranked 11 out of 67 financial institutions in the Washington-Baltimore-Arlington CSA. The bank's three major competitors are Bank of America, National Association, which ranked first in deposit market share (24.8 percent) with 108 offices, Manufacturers and Traders Trust Company, which ranked second in deposit market share (15.8 percent) with 120 offices, and Wells Fargo Bank, National Association, which is ranked third in deposit market share (9.3 percent) with 77 offices.

The 2017 FFIEC adjusted median family income for the AA was \$91,000. Low-income families in the AA, earned median annual income of \$45,550 or less, and moderate-income families earned an annual income of \$45,551 to \$72,880.

## Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2017 the unemployment rate in the Washington-Baltimore-Arlington MSA was 4.2 percent, down from 5.7 percent in January 2015. The national unemployment as of December was 4.1 percent, and 4.1 percent for the state of Maryland. According to the U.S. Census Bureaus' American Community Survey, the percentage of families living below the poverty level was 6.9 percent, compared to 9.8 percent across all of the bank's combined AAs.

## **Housing Characteristics**

According to the 2010 U.S. Census, 61.9 percent of the total housing units in the AA were owner occupied, and 29.6 percent are rental occupied units. Additionally, 5.2 percent of all owner occupied units and 19.0 percent of renter occupied units were located in low-income CTs. Furthermore, 10.7 percent of all single family (1-4 unit) homes and 13.8 percent of multifamily (5 plus unit) housing units were located in low-income tracts. In addition, 18.8 percent of all owner occupied units and 35.1 percent of renter occupied units were located in moderate-income CTs. Furthermore, 21.5 percent of all single family (1-4 unit) homes and 34.3 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. According to the 2010 U.S. Census, the median housing value was \$324,250 and the median monthly gross rent \$1,313.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$45,550 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$212,128 mortgage with a payment of \$1,139 per month. A moderate-income borrower making \$72,880 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$339,405 mortgage with a payment of \$1,822 per month. The median housing value in the AA was \$252,500 and \$285,050 in 2015 and 2017 reflecting a percent change of 12.9 percent from 2015 to 2017 according to Realtor.com data. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,530.

## **Economic Conditions**

According to Moody's Analytics, key economic drivers in the Baltimore-Towson MSA are healthcare, the federal government and logistics. Major employers in the area include Fort George G. Meade, John Hopkins University, Aberdeen Proving Ground, University of Maryland Health System, and John Hopkins Health System. Key economic drivers in the Silver Spring-Frederick-Rockville MD are high tech and the federal government. Major employers in the area include National Institutes of Health, Food and Drug Administration and Naval Support Activity Bethesda. Long term economic growth prospects for this area are strong due to decent population growth, a well-educated workforce, and a core of high-wage industries.

## **Community Contacts**

We reviewed discussions from two separate community listening sessions that occurred in 2017. There were 16 different community groups located in the AA, with broad representation from affordable housing, community services, financial inclusion, and small business support. Affordable housing was identified as a priority CD need throughout the AA. Other identified needs included access to capital for small businesses, workforce development, transportation, and affordable medical services. The community groups identified several opportunities for additional bank support

including funding for CDFIs, small business loan pools, housing counseling programs, capacity building, asset building programs, and affordable banking products and services.

## State of North Carolina

### Greensboro-Winston Salem-High Point CSA

<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)	319	8.5	22.9	37.3	30.4	0.9
Population by Geography	1,364,504	6.8	23.0	39.3	30.6	0.3
Housing Units by Geography	605,211	6.8	23.4	39.9	29.8	0.1
Owner-Occupied Units by Geography	346,612	3.1	17.4	42.7	36.8	0.0
Occupied Rental Units by Geography	193,899	12.5	31.8	35.0	20.2	0.4
Vacant Units by Geography	64,700	9.2	30.2	39.1	21.3	0.2
Businesses by Geography	86,897	5.1	20.2	35.8	38.6	0.3
Farms by Geography	2,748	2.0	15.2	47.8	34.9	0.1
Family Distribution by Income Level	351,546	22.1	17.7	18.4	41.9	0.0
Household Distribution by Income Level	540,511	23.7	16.6	17.1	42.5	0.0
Median Family Income MSA - 15500 Burlington, NC MSA		\$53,234	Median Housing Value			\$146,556
Median Family Income MSA - 24660 Greensboro-High Point, NC MSA		\$55,218	Median Gross Rent			\$740
Median Family Income MSA - 49180 Winston-Salem, NC MSA		\$56,536	Families Below Poverty Level			13.5%
FFIEC Adjusted Median Family Income for 2017 Greensboro-Winston Salem-High Point CSA		\$56,000				

*Source: 2010 U.S. Census & 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.*

The Greensboro-Winston Salem-High Point CSA (Greensboro-High Point, NC MSA, Winston-Salem, NC MSA, Burlington, NC MSA, and the Micropolitan Statistical Area of Mount Airy, NC) is comprised of the complete counties of Alamance, Davidson, Forsyth, Guilford, Rockingham, Stokes, Surry, and Yadkin in North Carolina. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 319 CTs of which 27 are low- income and 73 are moderate-income.

FNB has 28 full-service branches and 28 deposit-taking ATMs in the AA. As of June 30, 2017, FNB had a 3.0 percent deposit market share in the AA and is ranked sixth out of 27 financial institutions. The bank's three major competitors are Branch Banking and Trust Company, which ranked first in deposit market share (56.8 percent) with 49 offices, Wells Fargo Bank, National Association, which ranked second in deposit market

share (11.9 percent) with 58 offices, and Pinnacle, which ranked third in deposit market share (6.0 percent) with 20 offices.

The 2017 FFIEC adjusted median family income for the AA was \$56,000. Low-income families in the AA, earned median annual income of \$28,000 or less, and moderate-income families earned an annual income of \$28,001 to \$44,800.

### **Employment Factors**

According to the U.S. Bureau of Labor and Statistics, as of December 2017 the unemployment rate in the Greensboro-Winston Salem-High Point CSA was 4.8 percent, down from 5.0 percent in March 2017. The national unemployment as of December 2017 was 4.1 percent, and 4.5 percent for the state of North Carolina. According to the U.S. Census Bureaus' American Community Survey, the percentage of families living below the poverty level was 13.5 percent, compared to 9.8 percent across all of the bank's combined AAs.

### **Housing Characteristics**

According to the 2010 U.S. Census, 59.8 percent of the total housing units in the AA were owner occupied, and 29 percent are rental occupied units. Additionally, 2.5 percent of all owner occupied units and 12.2 percent of renter occupied units were located in low-income CTs. Furthermore, 5.72 percent of all single family (1-4 unit) homes and 10.5 percent of multifamily (5 plus unit) housing units were located in low-income tracts. In addition, 15.6 percent of all owner occupied units and 30.9 percent of renter occupied units were located in moderate-income CTs. Furthermore, 20.4 percent of all single family (1-4 unit) homes and 29.8 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. According to the 2010 U.S. Census, the median housing value was \$146,556 and the median monthly gross rent \$740.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$28,000 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$130,397 mortgage with a payment of \$700 per month. A moderate-income borrower making \$44,800 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$208,635 mortgage with a payment of \$1,120 per month. The median housing value in the AA was \$149,300 and \$191,950 in 2015 and 2017 reflecting a percent change of 28.6 percent from 2015 to 2017 according to Realtor.com data. This illustrates that low-income borrowers would be challenged for a mortgage loan in the AA with an estimated payment of \$1,030.

### **Economic Conditions**

According to Moody's Analytics, key economic drivers in the Greensboro MSA are manufacturing, healthcare, and logistics, with transportation/warehousing helping to boost the labor market. For the past two years, employment growth has lagged behind

state and national growth rates, as most industries in this market have shed jobs. The major employer in the area is Cone Health, which is responding to a growing need for services as an increasing share of the population ages and the overall population grows. The key economic drivers in the Winston-Salem MSA are healthcare, finance and higher education. The labor market has strengthened, but remains below state and national growth in payroll employment, particularly in professional/business services and manufacturing. Major employers in the area include Wake Forest University Baptist Medical Center and Novant Health. In job growth, there have been strong gains in education/healthcare and finance but declines in business/professional services and manufacturing. Similar to the other markets, the key drivers in the Burlington MSA are health and education. The major employer in the area is Laboratory Corp. of America. Burlington's economic performance is trailing the rest of North Carolina. Burlington is one of only four metro areas in the state where payrolls are below levels from the prior year.

### **Community Contacts**

We reviewed discussions with two community contacts located in the AA that occurred in 2017. One contact represented a government housing and community development agency. The contact noted that the economy is improving, particularly in areas that were hard-hit by the 2008 housing market crash. The downtown businesses are prospering, and many of the older buildings are being renovated and turned into condos and multifamily housing. Credit is generally available to those who are creditworthy individuals and businesses. The contact indicated that there are opportunities for banks to provide more support for education, training, and financial education.

## Raleigh-Durham-Chapel Hill CSA

<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)	300	8.3	23.3	29.3	36.7	2.3
Population by Geography	1,581,876	6.9	26.2	32.6	33.5	0.7
Housing Units by Geography	644,225	6.9	25.7	33.6	33.8	0.0
Owner-Occupied Units by Geography	371,527	2.4	22.1	36.0	39.5	0.0
Occupied Rental Units by Geography	222,947	13.5	30.9	30.0	25.6	0.1
Vacant Units by Geography	49,751	10.5	29.7	31.3	28.5	0.0
Businesses by Geography	123,857	4.6	21.3	32.5	41.0	0.6
Farms by Geography	3,060	2.8	22.9	42.5	31.7	0.1
Family Distribution by Income Level	388,984	21.8	16.8	18.6	42.8	0.0
Household Distribution by Income Level	594,474	22.8	16.6	17.5	43.1	0.0
Median Family Income MSA - 20500 Durham-Chapel Hill, NC MSA		\$69,840	Median Housing Value			\$229,417
Median Family Income MSA - 39580 Raleigh, NC MSA		\$78,057	Median Gross Rent			\$935
FFIEC Adjusted Median Family Income for 2017 Raleigh-Durham-Chapel Hill CSA		\$80,200	Families Below Poverty Level			9.1%

*Source: 2010 U.S. Census & 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.*

The Raleigh-Durham-Chapel Hill CSA (Raleigh, NC MSA, Durham, NC MSA and the MSA of Sanford, NC) is comprised of the complete counties of Durham, Johnston, Lee, Orange, and Wake in North Carolina. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 300 CTs of which 25 are low- income and 70 are moderate-income.

FNB has 15 full-service branches and 15 deposit-taking ATMs in the AA. As of June 30, 2017, FNB had a 1.8 percent deposit market share in the AA and is ranked 10 out of 35 financial institutions doing business in the Raleigh CSA. The bank's four major competitors are Wells Fargo Bank, National Association, which ranked first in deposit market share (23.5 percent) with 65 offices, Pacific Western Bank, which ranked second in deposit market share (14.6 percent) with one office, Branch Banking & Trust Company, which ranked third in deposit market share (12.4 percent) with 50 offices, and Bank of America, National Association, which ranked fourth in deposit market share (10.7 percent) with 30 offices.

The 2017 FFIEC adjusted median family income for the AA was \$80,200. Low-income families in the AA, earned median annual income of \$40,100 or less, and moderate-income families earned an annual income of \$40,101 to \$64,160.

### **Employment Factors**

According to the U.S. Bureau of Labor and Statistics, as of December 2017 the unemployment rate in the Raleigh AA was 4.0 percent, down from 4.2 percent in March 2017. The national unemployment as of December 2017 was 4.1 percent, and 4.5 percent for the state of North Carolina. According to the U.S. Census Bureau's American Community Survey, the percentage of families living below the poverty level was 9.1 percent, compared to 9.8 percent across all of the bank's combined AAs.

### **Housing Characteristics**

According to the 2010 U.S. Census, 58.6 percent of the total housing units in the AA were owner occupied, and 32.4 percent are rental occupied units. Additionally, 2.7 percent of all owner occupied units and 14.5 percent of renter occupied units were located in low-income CTs. Furthermore, 6.0 percent of all single family (1-4 unit) homes and 13.4 percent of multifamily (5 plus unit) housing units were located in low-income tracts. In addition, 21.0 percent of all owner occupied units and 30.7 percent of renter occupied units were located in moderate-income CTs. Furthermore, 23.2 percent of all single family (1-4 unit) homes and 28.0 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. According to the 2010 U.S. Census, the median housing value was \$229,417 and the median monthly gross rent \$935.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$40,100 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$186,747 mortgage with a payment of \$1,003 per month. A moderate-income borrower making \$64,160 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$298,796 mortgage with a payment of \$1,604 per month. The median housing value in the AA was \$255,000 and \$335,225 in 2015 and 2017, respectively, reflecting a percent change of 31.5 percent from 2015 to 2017 according to Realtor.com data. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,800.

### **Economic Conditions**

According to Moody's Analytics, key economic drivers in the Raleigh MSA are high tech, higher education, and manufacturing. Major employers include Duke University and Health System, Global Foundries, IBM, WakeMed Health and Hospitals, and North Carolina State University. Key economic drivers in the Durham MSA are also high tech, higher education, and manufacturing. In addition to Duke University and Health System,

major employers include IBM and UNC- Chapel Hill. Job growth was slow in the beginning of 2017, but growth is on track to outpace the state and U.S. averages over the next year.

### **Community Contacts**

We reviewed discussions with two community contacts located in the AA that occurred in 2017. One contact represented an affordable housing organization in the Research Triangle area. Affordable housing is a top priority in Raleigh, especially amidst rising gentrification and the expiring use of Housing and Urban Development properties. The contact indicated that bank financing is readily available, but there is a need for unsecured lines of credit, especially to help finance pre-development work.

The other contact represented a community development loan consortium serving North Carolina, South Carolina, Virginia, Tennessee and Georgia. The contact indicated that there is a high need for multifamily affordable housing in both rural and urban areas.

## State of Ohio

## Cleveland-Akron-Canton CSA

Table A – Demographic Information of the Assessment Area						
2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	806	15.9	21.5	36.6	25.4	0.6
Population by Geography	2,780,440	10.1	18.1	38.9	32.9	0.0
Housing Units by Geography	1,263,774	11.9	20.2	38.7	29.2	0.0
Owner-Occupied Units by Geography	773,685	5.4	15.1	42.0	37.5	0.0
Occupied Rental Units by Geography	357,377	20.3	28.4	35.2	16.1	0.0
Vacant Units by Geography	132,712	27.3	27.3	28.8	16.5	0.0
Businesses by Geography	171,377	7.6	13.7	37.8	40.5	0.3
Farms by Geography	4,479	2.3	9.4	45.6	42.6	0.0
Family Distribution by Income Level	719,170	21.5	17.4	21.0	40.1	0.0
Household Distribution by Income Level	1,131,062	24.8	15.6	17.8	41.9	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$62,882	Median Housing Value			\$150,092
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$62,627	Median Gross Rent			\$716
			Families Below Poverty Level			10.1%

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						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	806	18.4	22.5	33.9	24.1	1.2
Population by Geography	2,768,227	11.9	19.9	36.2	31.7	0.3
Housing Units by Geography	1,269,259	13.5	22.1	35.6	28.4	0.5
Owner-Occupied Units by Geography	741,333	6.3	16.6	39.6	37.3	0.1
Occupied Rental Units by Geography	388,232	22.1	29.8	31.3	15.9	0.9
Vacant Units by Geography	139,694	28.1	29.4	26.0	15.5	1.0
Businesses by Geography	176,269	8.7	15.8	34.1	40.9	0.6
Farms by Geography	4,737	3.5	10.7	44.3	41.4	0.1
Family Distribution by Income Level	699,389	22.4	16.7	19.7	41.1	0.0

Household Distribution by Income Level	1,129,565	25.6	15.4	16.9	42.1	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$138,355
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Median Gross Rent			\$765
FFIEC Adjusted Median Family Income for 2017 Cleveland-Akron-Canton CSA		\$67,900	Families Below Poverty Level			11.3%
<i>Source: 2010 U.S. Census &amp; 2015 ACS Census and 2017 D&amp;B Data                  Due to rounding, totals may not equal 100.0                  (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Cleveland-Akron-Canton CSA (Cleveland-Elyria, OH MSA and Akron, OH MSA) is comprised of the complete counties of Cuyahoga, Geauga, Lake, Lorain, and Medina, Portage and Summit in Ohio. The Canton-Massillon, OH MSA is excluded from the AA since FNB does not have any branches in this MSA. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 806 CTs of which 148 are low-income and 181 are moderate-income.

FNB has 21 full-service branches and 20 deposit-taking ATMs in the AA. As of June 30, 2017, FNB had a 0.9 percent deposit market share in the AA and is ranked 14 out of 41 financial institutions doing business in the Cleveland-Akron-Canton CSA. The bank’s three major competitors are Key Bank, which ranked first in deposit market share (19.9 percent) with 93 offices, Huntington National Bank, which ranked second in deposit share (16.3 percent) with 177 offices, and PNC Bank, National Association which ranked third in deposit share (13.6 percent) with 91 offices.

The 2017 FFIEC adjusted median family income for the AA was \$67,900. Low-income families in the AA, earned median annual income of \$33,950 or less, and moderate-income families earned an annual income of \$33,951 to \$54,320.

**Employment Factors**

According to the U.S. Bureau of Labor and Statistics, as of December 2017 the unemployment rate in the Cleveland-Akron-Canton MSA was 5.4 percent, which was unchanged from January 2015. The national unemployment as of December 2017 was 4.1 percent, and 4.9 percent for the state of Ohio. According to the U.S. Census Bureaus’ American Community Survey, the percentage of families living below the poverty level was 11.3 percent, compared to 9.8 percent across all of the bank’s combined AAs.

**Housing Characteristics**

According to the 2010 U.S. Census, 61.2 percent of the total housing units in the AA were owner occupied, and 28.3 percent are rental occupied units. Additionally, 5.4 percent of all owner occupied units and 20.3 percent of renter occupied units were

located in low-income CTs. Furthermore, 11.4 percent of all single family (1-4 unit) homes and 15.1 percent of multifamily (5 plus unit) housing units were located in low-income tracts. In addition, 15.1 percent of all owner occupied units and 28.4 percent of renter occupied units were located in moderate-income CTs. Furthermore, 18.6 percent of all single family (1-4 unit) homes and 26.3 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. According to the 2010 U.S. Census, the median housing value was \$138,355 and the median monthly gross rent \$765.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$33,950 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$158,107 mortgage with a payment of \$849 per month. A moderate-income borrower making \$54,320 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$252,970 mortgage with a payment of \$1,358 per month. The median housing value in the AA was \$127,000 and \$159,550 in 2015 and 2017, reflecting a percent change of 25.6 percent from 2015 to 2017 according to Realtor.com data. This illustrates that low- and moderate-income borrowers may qualify for a mortgage loan in the AA with an estimated payment of \$856.

### **Economic Conditions**

According to Moody's Analytics, key economic drivers in the Cleveland-Elyria MSA are healthcare, finance, and manufacturing. Major employers include Cleveland Clinic Foundation and University Hospitals.

Key economic drivers in the Akron MSA are manufacturing and energy. Major employers include Summa Health System, Akron General Health System, Kent State University, and Akron Children's Hospital. A declining population will also hold job growth below that of the state and the nation over the long run.

### **Community Contacts**

We reviewed discussions with two community contacts located in the AA. One contact represented an affordable housing organization in the Akron MSA. According to the contact, the most pressing needs are economic development, quality affordable housing, and job creation. There is sufficient availability of financial services in the area, particularly for homebuyers, but there is also a need for more access to credit for small businesses.

Another contact represented a community development organization that provides a range of services to help foster and sustain vibrant neighborhoods in the Cleveland area. Local banks are supportive and engaged, but there are opportunities for banks to provide additional funding for general operating support and financial education, to serve on boards or committees, to increase small business lending, and to offer small dollar loans and secured and unsecured credit cards.

## State of Pennsylvania

### Harrisburg-York-Lebanon CSA

Table A – Demographic Information of the Assessment Area						
2015						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	204	8.8	18.1	51.5	21.1	0.5
Population by Geography	938,478	5.8	13.7	56.7	23.4	0.4
Housing Units by Geography	393,450	6.2	15.2	56.8	21.8	0.0
Owner-Occupied Units by Geography	265,819	2.6	10.4	60.8	26.2	0.0
Occupied Rental Units by Geography	102,328	12.5	25.7	49.8	12.0	0.0
Vacant Units by Geography	25,303	18.8	22.8	43.2	15.2	0.0
Businesses by Geography	61,038	4.4	17.8	53.3	24.4	0.0
Farms by Geography	2,144	0.7	6.5	70.0	22.9	0.0
Family Distribution by Income Level	245,615	18.3	18.4	23.6	39.7	0.0
Household Distribution by Income Level	368,147	22.2	17.3	19.3	41.2	0.0
Median Family Income MSA - 25420 Harrisburg-Carlisle, PA MSA		\$69,389	Median Housing Value			\$165,275
Median Family Income MSA - 49620 York-Hanover, PA MSA		\$67,624	Median Gross Rent			\$754
			Families Below Poverty Level			6.4%

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						
2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	235	7.7	17.4	53.6	20.9	0.4
Population by Geography	1,072,046	5.1	13.4	57.8	23.3	0.3
Housing Units by Geography	448,323	5.4	14.9	57.7	22.0	0.0
Owner-Occupied Units by Geography	304,258	2.3	10.1	61.5	26.2	0.0
Occupied Rental Units by Geography	115,432	11.0	25.6	51.2	12.2	0.0
Vacant Units by Geography	28,633	16.6	23.1	44.1	16.2	0.0
Businesses by Geography	68,063	4.0	16.6	54.9	24.5	0.0
Farms by Geography	2,587	0.5	5.4	70.6	23.5	0.0
Family Distribution by Income Level	281,412	18.1	18.5	23.8	39.7	0.0

Household Distribution by Income Level	419,690	22.2	17.2	19.5	41.0	0.0
Median Family Income MSA - 25420 Harrisburg-Carlisle, PA MSA		\$69,389	Median Housing Value			\$163,398
Median Family Income MSA - 30140 Lebanon, PA MSA		\$62,174	Median Gross Rent			\$743
Median Family Income MSA - 49620 York-Hanover, PA MSA		\$67,624	Families Below Poverty Level			6.4%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

**Table A – Demographic Information of the Assessment Area**

**2017**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	235	10.6	16.6	54.0	17.9	0.9
Population by Geography	1,087,957	6.7	13.0	59.0	20.7	0.6
Housing Units by Geography	459,846	7.2	14.2	59.0	19.6	0.0
Owner-Occupied Units by Geography	298,504	2.9	10.0	63.1	24.0	0.0
Occupied Rental Units by Geography	126,752	14.8	22.5	51.4	11.3	0.0
Vacant Units by Geography	34,590	16.5	20.2	51.0	12.3	0.0
Businesses by Geography	67,592	6.4	15.1	58.1	20.4	0.0
Farms by Geography	2,559	1.1	4.7	73.3	20.9	0.0
Family Distribution by Income Level	284,003	19.4	18.3	22.3	40.0	0.0
Household Distribution by Income Level	425,256	22.4	16.9	19.6	41.1	0.0
Median Family Income MSA - 25420 Harrisburg-Carlisle, PA MSA		\$71,723	Median Housing Value			\$166,518
Median Family Income MSA - 30140 Lebanon, PA MSA		\$65,676	Median Gross Rent			\$849
Median Family Income MSA - 49620 York-Hanover, PA MSA		\$69,846	Families Below Poverty Level			7.8%
FFIEC Adjusted Median Family Income for 2017 Harrisburg-York-Lebanon CSA		\$74,700				

*Source: 2010 U.S. Census & 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.*

The Harrisburg-York-Lebanon CSA (Harrisburg-Carlisle, PA MSA; Lebanon, PA MSA; and York-Hanover, PA MSA) is comprised of the complete counties of Cumberland, Dauphin, Lebanon, and York. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 235 CTs of which 25 are low- income and 39 are moderate-income.

FNB has 23 full-service branches and 50 deposit-taking ATMs in the AA. As of June 30, 2017, FNB had a 7.6 percent deposit market share in the AA and is ranked fifth out of 26 financial institutions in the Harrisburg-York-Lebanon CSA. The bank's three major competitors are Manufacturers and Traders Trust Company which ranked first in deposit market share (19.2 percent) with 54 offices, PNC Bank, National Association, which ranked second in deposit market share (12.4 percent) with 27 offices, and Fulton Bank, which ranked third in deposit market share (10.6 percent) with 32 offices.

The 2017 FFIEC adjusted median family income for the AA was \$74,700. Low-income families in the AA, earned median annual income of \$37,350 or less, and moderate-income families earned an annual income of \$37,351 to \$59,760.

### **Employment Factors**

According to the U.S. Bureau of Labor and Statistics, as of December 2017 the unemployment rate in the Harrisburg-York-Lebanon CSA was 4.2 percent, down from 4.5 percent in January 2015. The national unemployment as of December 2017 was 4.1 percent, and 4.8 percent for the state of Pennsylvania. According to the U.S. Census Bureaus' American Community Survey, the percentage of families living below the poverty level was 7.8 percent, compared to 9.8 percent across all of the bank's combined AAs.

### **Housing Characteristics**

According to the 2010 U.S. Census, 67.9 percent of the total housing units in the AA were owner occupied, and 25.8 percent are rental occupied units. Additionally, 2.3 percent of all owner occupied units and 11.1 percent of renter occupied units were located in low-income CTs. Furthermore, 5.4 percent of all single family (1-4 unit) homes and 8.0 percent of multifamily (5 plus unit) housing units were located in low-income tracts. In addition, 10.1 percent of all owner occupied units and 25.6 percent of renter occupied units were located in moderate-income CTs. Furthermore, 14.4 percent of all single family (1-4 unit) homes and 25.3 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. According to the 2010 U.S. Census, the median housing value was \$166,518 and the median monthly gross rent \$849.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$37,350 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$173,940 mortgage with a payment of \$934 per month. A moderate-income borrower making \$59,760 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$278,305 mortgage with a payment of \$1,494 per month. The median housing value in the AA was \$164,950 and \$189,950 in 2015 and 2017 reflecting a percent change of 15.2 percent from 2015 to 2017 according to Realtor.com data. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,020.

## **Economic Conditions**

According to Moody's Analytics, key economic drivers in the Harrisburg-Carlisle MSA are logistics, finance, and state government. Major employers include Penn State Medical Center, Giant Food Stores, Hershey Entertainment and Resorts, Hershey Co., Walmart Stores Inc., and Pinnacle Health System. Key economic drivers in the Lebanon MSA are manufacturing and logistics. All of the top employers in the area employ fewer than 1,400 employees. Job growth is low in the area and local economic conditions are at risk of falling into recession. Employment in factories will taper off towards the end of the decade, shifting more towards health care and services. Key economic drivers in the York-Hanover MSA are also manufacturing and logistics. Similar to Lebanon, this area is underperforming the nation, with very low job growth. Small gains in healthcare continue to be offset by the decline in consumer goods manufacturing.

## **Community Contacts**

We reviewed discussions with two community contacts that occurred in 2017. One contact included representation from a city redevelopment authority. The contact indicated that the top priority is a need for innovative mortgage programs to help borrowers with lower credit scores. Banks could also be more supportive of economic development. The other contact included representation from an organization that provides community development programs and services. Affordable housing, livable wage jobs, and access to transportation were identified as high priorities.

## Johnstown MSA

2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	0.0	23.8	61.9	14.3	0.0
Population by Geography	143,679	0.0	15.7	64.7	19.6	0.0
Housing Units by Geography	65,837	0.0	19.9	63.0	17.1	0.0
Owner-Occupied Units by Geography	43,396	0.0	13.2	66.5	20.3	0.0
Occupied Rental Units by Geography	15,406	0.0	31.9	55.9	12.3	0.0
Vacant Units by Geography	7,035	0.0	34.8	57.1	8.2	0.0
Businesses by Geography	7,464	0.0	12.6	68.1	19.3	0.0
Farms by Geography	226	0.0	5.8	77.0	17.3	0.0
Family Distribution by Income Level	38,530	18.9	19.6	22.0	39.5	0.0
Household Distribution by Income Level	58,802	23.3	17.2	17.5	41.9	0.0
Median Family Income MSA - 27780 Johnstown, PA MSA		\$50,900	Median Housing Value			\$87,561
			Median Gross Rent			\$486
			Families Below Poverty Level			9.6%

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.

2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	4.8	23.8	50.0	21.4	0.0
Population by Geography	139,381	1.8	16.5	55.1	26.6	0.0
Housing Units by Geography	65,413	2.5	20.2	52.8	24.5	0.0
Owner-Occupied Units by Geography	42,440	1.4	13.3	59.3	26.0	0.0
Occupied Rental Units by Geography	15,025	3.8	33.2	40.4	22.5	0.0
Vacant Units by Geography	7,948	6.2	32.2	41.7	19.9	0.0
Businesses by Geography	7,296	1.8	19.0	48.3	30.9	0.0
Farms by Geography	219	0.5	8.2	58.4	32.9	0.0
Family Distribution by Income Level	36,531	19.5	19.4	20.8	40.3	0.0
Household Distribution by Income Level	57,465	24.8	16.1	17.0	42.1	0.0
Median Family Income MSA - 27780 Johnstown, PA MSA		\$55,933	Median Housing Value			\$87,753
FFIEC Adjusted Median Family Income for 2017 Johnstown MSA		\$60,300	Median Gross Rent			\$564

	Families Below Poverty Level	10.3%
<i>Source: 2010 U.S. Census &amp; 2015 ACS Census and 2017 D&amp;B Data                  Due to rounding, totals may not equal 100.0                  (*) The NA category consists of geographies that have not been assigned an income classification.</i>		

The Johnstown MSA (Johnstown, PA MSA) is comprised of the complete county of Cambria, NC. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 42 CTs of which two are low- income and 10 are moderate-income.

FNB has 14 full-service branches and 14 deposit-taking ATMs in the AA. As of June 30, 2017, FNB had a 19.0 percent deposit market share in the AA and is ranked third out of 14 financial institutions doing business in the Johnstown MSA. The bank’s major competitors are Ameriserv Financial Bank, which ranked first in deposit market share (22.9 percent) with 10 offices, and 1st Summit Bank, which ranked second in deposit share (22.2 percent) with 11 offices.

The 2017 FFIEC adjusted median family income for the AA was \$60,300. Low-income families in the AA, earned median annual income of \$30,150 or less, and moderate-income families earned an annual income of \$30,151 to \$48,240.

**Employment Factors**

According to the U.S. Bureau of Labor and Statistics, as of December 2017 the unemployment rate in the Johnstown MMSA was 5.7 percent, down from 5.6 percent in 2015. The national unemployment as of December 2017 was 4.1 percent, and 4.8 percent for the state of Pennsylvania. According to the U.S. Census Bureaus’ American Community Survey, the percentage of families living below the poverty level was 10.3 percent, compared to 9.8 percent across all of the bank’s combined AAs.

**Housing Characteristics**

According to the 2010 U.S. Census, 65.9 percent of the total housing units in the AA were owner occupied, and 23.4 percent are rental occupied units. There are no low-income CTs in the AA. In addition, 13.2 percent of all owner occupied units and 31.9 percent of renter occupied units were located in moderate-income CTs. Furthermore, 19.8 percent of all single family (1-4 unit) homes and 28.8 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. According to the 2010 U.S. Census, the median housing value was \$87,753 and the median monthly gross rent \$564.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$30,150 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$140,410 mortgage with a payment of \$754 per month. A moderate-income borrower making \$48,240 per year (or less than 80 percent of the 2017 FFIEC adjusted median family

income in the AA) could afford a \$224,656 mortgage with a payment of \$1,206 per month. The median housing value in the AA was \$208,313 and \$325,050 in 2015 and 2017, reflecting a percent change of 56.0 percent from 2015 to 2017 according to Realtor.com data. This illustrates that both low-income borrowers and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,745.

### **Economic Conditions**

According to Moody's Analytics, key economic drivers in the Johnstown MSA are health care, manufacturing, and defense. Major employers include Conemaugh Valley Memorial Hospital, St Francis University, Cambria Care Center, and the University of Pittsburgh. The labor market is struggling despite job gains in the private sector. Payroll employment is flat and has not seen such lows since the late 1980s. Average hourly earnings are among the lowest in Pennsylvania. Modest gains in employment will stabilize housing demand in the near term.

### **Community Contacts**

We reviewed a discussion with one community contact located in the AA that occurred in 2017. The contact represented an economic development organization. Though none have yet been realized, the area has seen some indicators that suggest investment in manufacturing, small business development, and the relocation of corporate campuses has been considered. Ample resources are available for small business development. Much of the financial industry leadership on small business development comes from smaller, local, community banks.

## State College MSA

Table A – Demographic Information of the Assessment Area						
2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	3.2	16.1	45.2	25.8	9.7
Population by Geography	153,990	2.9	13.8	49.4	24.2	9.8
Housing Units by Geography	61,899	3.1	16.6	55.1	24.9	0.3
Owner-Occupied Units by Geography	33,011	0.0	12.9	59.4	27.7	0.0
Occupied Rental Units by Geography	21,960	7.3	20.8	47.3	23.9	0.7
Vacant Units by Geography	6,928	4.1	21.3	59.1	14.8	0.6
Businesses by Geography	9,068	6.5	10.6	48.5	31.1	3.3
Farms by Geography	389	0.0	13.1	63.2	22.9	0.8
Family Distribution by Income Level	31,564	18.3	19.0	22.8	39.9	0.0
Household Distribution by Income Level	54,971	25.4	15.1	17.5	42.0	0.0
Median Family Income MSA - 44300 State College, PA MSA		\$65,121	Median Housing Value			\$176,951
			Median Gross Rent			\$787
			Families Below Poverty Level			5.9%

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						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	3.2	19.4	38.7	25.8	12.9
Population by Geography	157,823	3.3	20.9	40.6	22.9	12.2
Housing Units by Geography	64,489	0.2	24.5	44.4	24.0	6.9
Owner-Occupied Units by Geography	34,606	0.0	16.0	51.7	31.5	0.8
Occupied Rental Units by Geography	22,577	0.5	36.1	33.4	15.0	15.1
Vacant Units by Geography	7,306	0.4	28.6	43.3	16.5	11.1
Businesses by Geography	8,849	2.0	18.5	39.4	29.9	10.3
Farms by Geography	385	0.5	16.1	54.8	27.5	1.0
Family Distribution by Income Level	32,532	19.6	18.5	21.5	40.3	0.0
Household Distribution by Income Level	57,183	25.5	15.5	16.4	42.5	0.0
Median Family Income MSA - 44300 State College, PA MSA		\$74,118	Median Housing Value			\$208,908
FFIEC Adjusted Median Family Income for 2017		\$75,000	Median Gross Rent			\$927

State College MSA			
		Families Below Poverty Level	6.5%
<i>Source: 2010 U.S. Census &amp; 2015 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

The State College MSA (State College, PA MSA) is comprised of Centre County in Pennsylvania. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 31 CTs of which one is low- income, and six are moderate-income.

FNB has 13 full-service branches and 15 deposit-taking ATMs in the AA. As of June 30, 2017, FNB had a 17.0 percent deposit market share in the AA and is ranked second out of 16 financial institutions doing business in the State College MSA. The bank’s major competitors are PNC Bank, National Association which ranked first in deposit market share (23.7 percent) with six offices, and Branch Banking and Trust Co., which ranked third in deposit share (11.9 percent) with five offices.

The 2017 FFIEC adjusted median family income for the AA was \$75,000. Low-income families in the AA, earned median annual income of \$37,500 or less, and moderate-income families earned an annual income of \$37,501 to \$60,000.

**Employment Factors**

According to the U.S. Bureau of Labor and Statistics, as of December 2017 the unemployment rate in the State College MMSA was 3.6 percent, down from 4.0 percent in January 2015. The national unemployment as of December 2017 was 4.1 percent, and 4.8 percent for the state of Pennsylvania. According to the U.S. Census Bureau’s American Community Survey, the percentage of families living below the poverty level was 6.5 percent, compared to 9.8 percent across all of the bank’s combined AAs.

**Housing Characteristics**

According to the 2010 U.S. Census, 53.3 percent of the total housing units in the AA were owner occupied, and 35.5 percent are rental occupied units. Additionally, 0.1 percent of all owner occupied units and 7.3 percent of renter occupied units were located in low-income CTs. Furthermore, 0.2 percent of all single family (1-4 unit) homes and 12.5 percent of multifamily (5 plus unit) housing units were located in low-income tracts. In addition, 12.9 percent of all owner occupied units and 20.8 percent of renter occupied units were located in moderate-income CTs. Furthermore, 14.9 percent of all single family (1-4 unit) homes and 21.7 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. According to the 2010 U.S. Census, the median housing value was \$208,908 and the median monthly gross rent \$927.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$37,500 per year (or less than 50 percent of

the 2017 FFIEC adjusted median family income in the AA) could afford a \$174,639 mortgage with a payment of \$938 per month. A moderate-income borrower making \$60,000 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$279,422 mortgage with a payment of \$1,500 per month. The median housing value in the AA was \$199,500 and \$225,000 in 2015 and 2017, reflecting a percent change of 12.8 percent from 2015 to 2017 according to Realtor.com data. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,208.

### **Economic Conditions**

According to Moody's Analytics, key economic drivers in the State College MSA are higher education and high tech industries. Major employers include Pennsylvania State University, Mount Nittany Health, Walmart, and Glenn O. Hawbaker, Inc. Private sector employment is expanding, but cuts in the much larger public sector leave employment below the previous year. Among other factors, losses in mid-wage jobs are keeping average hourly wages in the private sector from rising. Weakness in the labor market is weighing on the housing market.

### **Community Contacts**

We reviewed discussions with two community contacts located in the AA. One contact represented an affordable housing organization. According to the contact, the most pressing needs is access to affordable housing in the city of State College. Much of housing development is rental for students. There is also notable condominium development. Much of this development is either purchased by parents of students who then rent them out to their children and their friends, or are "football houses." These are condominiums purchased by football fans who use them on weekends during football season. The result limits the volume of affordable housing development and raises the cost of housing overall.

Another contact represented an economic development organization. Most notable of economic conditions in the area is that the University is not only the largest employer of professionals in the area, but also service workers. The University pays higher wages and offers good benefits, especially a 75 percent discount of tuition for employees and their dependents. There are limited opportunities for affordable housing in State College though it is more available in the rest of the county. Numerous resources are available for small business development. Banks operating in the MSA are reasonably engaged in community development.

## State of South Carolina

### SC Non-MSA

<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)	13	0.0	30.8	53.8	15.4	0.0
Population by Geography	55,863	0.0	27.5	51.4	21.1	0.0
Housing Units by Geography	23,993	0.0	27.0	52.3	20.7	0.0
Owner-Occupied Units by Geography	13,941	0.0	23.1	52.8	24.0	0.0
Occupied Rental Units by Geography	6,582	0.0	34.9	51.9	13.2	0.0
Vacant Units by Geography	3,470	0.0	27.9	50.8	21.3	0.0
Businesses by Geography	2,253	0.0	22.0	61.5	16.6	0.0
Farms by Geography	81	0.0	14.8	61.7	23.5	0.0
Family Distribution by Income Level	13,630	23.7	16.5	18.0	41.8	0.0
Household Distribution by Income Level	20,523	25.2	15.2	16.1	43.4	0.0
Median Family Income MSA SC Non-MSAs		\$44,547	Median Housing Value			\$88,914
FFIEC Adjusted Median Family Income for 2017 SC Non-MSA		\$45,900	Median Gross Rent			\$629
			Families Below Poverty Level			18.9%
<i>Source: 2010 U.S. Census &amp; 2015 ACS Census and 2017 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The SC Non-MSA is comprised of the complete county of Cherokee, SC. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 13 CTs of which four are moderate-income. There are no low-income CTs within the AA.

FNB has two full-service branches and two deposit-taking ATMs in the AA. As of June 30, 2017, FNB had a 16.8 percent deposit market share in the AA and is ranked three out of seven financial institutions doing business in the SC non-MSA. The bank's major competitors are First Piedmont Federal Savings and Loan Association of Gaffney, which ranked first in deposit market share (38.9 percent) with three offices, and Bank of America, National Association, which ranked second in deposit share (18.1 percent) with two office.

### Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2017 the unemployment rate in the State College MSA was 3.6 percent, down from 3.8 percent in March 2017. The national unemployment as of December 2017 was 4.1 percent, and 4.2 percent for the state of South Carolina. According to the U.S. Census Bureau's

American Community Survey, the percentage of families living below the poverty level was 6.5 percent, compared to 9.8 percent across all of the bank's combined AAs.

The 2017 FFIEC adjusted median family income for the AA was \$45,900. Low-income families in the AA, earned median annual income of \$22,950 or less, and moderate-income families earned an annual income of \$22,951 to \$36,720.

### **Housing Characteristics**

According to the 2010 U.S. Census, 60.3 percent of the total housing units in the AA were owner occupied, and 27.8 percent are rental occupied units. There are no low-income CTs in the AA. In addition, 11.2 percent of all owner occupied units and 31.9 percent of renter occupied units were located in moderate-income CTs. Furthermore, 18.6 percent of all single family (1-4 unit) homes and 47.1 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. According to the 2010 U.S. Census, the median housing value was \$88,914 and the median monthly gross rent \$629.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$22,950 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$106,879 mortgage with a payment of \$574 per month. A moderate-income borrower making \$36,270 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$171,007 mortgage with a payment of \$918 per month.

### **Economic Conditions**

According to Moody's Analytics, South Carolina's economy overall remains strong, despite some recent loss in momentum. Key economic drivers across the state are manufacturing, tourism and defense. The vibrant economy has attracted more workers into the labor force, driving rapid household formation, rising incomes, and stronger home sales. According to the Cherokee County Development Board, Cherokee enjoys a thriving and profitable local economy with a diversified industrial base, an abundance of natural and manufactured resources, and convenient access to two major highways. Key industries include automotive and automotive support businesses, advanced materials, manufacturing, logistics, and energy. Leading employers include Nestle, Freightliner, and Dollar Tree.

## 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 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 the 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; (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables P, R, and T, and part of Table V. 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. 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 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table D. Lending Inside and Outside of the Assessment Area** – Presents the percentage distribution of the number and dollar amount of loans originated and purchased by the bank over the evaluation period inside and outside of the assessment area(s) by loan type.
- 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 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 (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 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 (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 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 -(h)-6 and 7 for guidance on when a bank may receive positive CRA consideration for such investments.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Tables of Performance Data**

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**MULTISTATE METROPOLITAN AREA RATING..... D-5**  
Charlotte-Concord-Gastonia, NC-SC MMSA.....D-5  
Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA..... D-8  
Youngstown-Warren-Boardman, OH-PA MMSA .....D-17

**STATE RATING ..... D-32**  
State of Maryland..... D-44  
State of North Carolina..... D-44  
State of Ohio .....D-59  
State of Pennsylvania.....D-68  
State of South Carolina.....D-79

**Multistate Metropolitan Area Rating**

**Charlotte-Concord-Gastonia, NC-SC MMSA**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: MULTI-STATE						Evaluation Period: MARCH 1, 2017 TO DECEMBER 31, 2017				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Charlotte MMSA	100.0	343	68,655	282	55,247	13	2,013	1	1,000	639	126,915	100.0

\* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2017 to December 31, 2017.

\*\*\* Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MULTI-STATE				Evaluation Period: MARCH 1, 2017 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Charlotte MMSA	3	8,797	5	1,001	8	9,798	100.0	0	0

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: MULTI-STATE							
Evaluation Period: MARCH 1, 2017 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Charlotte MMSA	100.0	16	12.3	6.3	18.8	18.8	56.3	0	0	0	0	0	0	8.1	25.5	32.3	33.8

**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
Charlotte MMSA	343	137,310	100.0	75,090	3.6	6.1	2.9	21.3	21.9	18.3	35.8	42.6	32.3	39.3	29.4	46.5	0.0	0.0	0.1
<b>Total</b>	<b>343</b>	<b>137,310</b>	<b>100.0</b>	<b>75,090</b>	<b>3.6</b>	<b>6.1</b>	<b>2.9</b>	<b>21.3</b>	<b>21.9</b>	<b>18.3</b>	<b>35.8</b>	<b>42.6</b>	<b>32.3</b>	<b>39.3</b>	<b>29.4</b>	<b>46.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.1</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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2017</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Charlotte MMSA	343	137,310	100.0	75,090	22.5	9.9	5.8	16.8	21.6	17.3	18.6	18.1	19.5	42.1	39.7	41.9	0.0	10.8	15.5	
<b>Total</b>	<b>343</b>	<b>137,310</b>	<b>100.0</b>	<b>75,090</b>	<b>22.5</b>	<b>9.9</b>	<b>5.8</b>	<b>16.8</b>	<b>21.6</b>	<b>17.3</b>	<b>18.6</b>	<b>18.1</b>	<b>19.5</b>	<b>42.1</b>	<b>39.7</b>	<b>41.9</b>	<b>0.0</b>	<b>10.8</b>	<b>15.5</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*

**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
Charlotte MMSA	282	110,494	100.0	43,613	7.8	11.0	7.9	21.3	17.7	14.7	27.1	33.3	31.3	42.9	37.9	45.2	0.9	0.0	0.9
<b>Total</b>	<b>282</b>	<b>110,494</b>	<b>100.0</b>	<b>43,613</b>	<b>7.8</b>	<b>11.0</b>	<b>7.9</b>	<b>21.3</b>	<b>17.7</b>	<b>14.7</b>	<b>27.1</b>	<b>33.3</b>	<b>31.3</b>	<b>42.9</b>	<b>37.9</b>	<b>45.2</b>	<b>0.9</b>	<b>0.0</b>	<b>0.9</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	
Charlotte MMSA	282	110,494	100.0	43,613	83.6	49.3	49.3	6.0	34.4	10.5	16.3	
<b>Total</b>	<b>282</b>	<b>110,494</b>	<b>100.0</b>	<b>43,613</b>	<b>83.6</b>	<b>49.3</b>	<b>49.3</b>	<b>6.0</b>	<b>34.4</b>	<b>10.5</b>	<b>16.3</b>	

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Charlotte MMSA	13	4,026	100.0	272	4.2	0.0	1.5	19.6	7.7	15.1	44.8	84.6	69.1	31.1	7.7	14.3	0.3	0.0	0.0
<b>Total</b>	<b>13</b>	<b>4,026</b>	<b>100.0</b>	<b>272</b>	<b>4.2</b>	<b>0.0</b>	<b>1.5</b>	<b>19.6</b>	<b>7.7</b>	<b>15.1</b>	<b>44.8</b>	<b>84.6</b>	<b>69.1</b>	<b>31.1</b>	<b>7.7</b>	<b>14.3</b>	<b>0.3</b>	<b>0.0</b>	<b>0.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2017</b>
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Farms with Revenues &lt;= 1MM</b>			<b>Farms with Revenues &gt; 1MM</b>		<b>Farms with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>% Farms</b>	<b>% Bank Loans</b>
Charlotte MMSA	13	4,026	100.0	272	95.4	69.2	49.6	2.9	30.8	1.6	0.0
<b>Total</b>	<b>13</b>	<b>4,026</b>	<b>100.0</b>	<b>272</b>	<b>95.4</b>	<b>69.2</b>	<b>49.6</b>	<b>2.9</b>	<b>30.8</b>	<b>1.6</b>	<b>0.0</b>
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0</i>											

**Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: MULTI-STATE						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Pittsburgh CSA	100.0	7,278	1,141,700	2,924	403,872	44	1,723	10	37,700	10,256	1,584,995	100.0

\* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2015 to December 31, 2017.

\*\*\* Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MULTI-STATE				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Pittsburgh CSA	24	12,299	152	32,947	176	45,246	100.0	0	0

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: MULTI-STATE							
Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Pittsburgh CSA	100.0	95	73.1	6.3	20.0	44.2	28.4	0	7	0	-1	-4	-2	4.9	20.3	48.6	25.8

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-2016**

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
Pittsburgh CSA	5,173	1,618,896	100.0	67,835	2.1	1.2	1.1	18.8	17.0	13.1	52.1	48.8	48.8	27.0	33.1	36.9	0.0	0.0	0.0
<b>Total</b>	<b>5,173</b>	<b>1,618,896</b>	<b>100.0</b>	<b>67,835</b>	<b>2.1</b>	<b>1.2</b>	<b>1.1</b>	<b>18.8</b>	<b>17.0</b>	<b>13.1</b>	<b>52.1</b>	<b>48.8</b>	<b>48.8</b>	<b>27.0</b>	<b>33.1</b>	<b>36.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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
Pittsburgh CSA	2,105	664,504	100.0	62,375	2.7	1.7	1.6	17.4	16.0	14.0	51.9	48.9	49.9	28.0	33.4	34.4	0.0	0.0	0.0
<b>Total</b>	<b>2,105</b>	<b>664,504</b>	<b>100.0</b>	<b>62,375</b>	<b>2.7</b>	<b>1.7</b>	<b>1.6</b>	<b>17.4</b>	<b>16.0</b>	<b>14.0</b>	<b>51.9</b>	<b>48.9</b>	<b>49.9</b>	<b>28.0</b>	<b>33.4</b>	<b>34.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																		<b>2015-2016</b>		
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Pittsburgh CSA	5,173	1,618,896	100.0	67,835	20.3	9.7	7.9	18.1	17.2	18.0	21.9	21.9	21.0	39.6	47.2	40.1	0.0	4.0	12.9	
<b>Total</b>	<b>5,173</b>	<b>1,618,896</b>	<b>100.0</b>	<b>67,835</b>	<b>20.3</b>	<b>9.7</b>	<b>7.9</b>	<b>18.1</b>	<b>17.2</b>	<b>18.0</b>	<b>21.9</b>	<b>21.9</b>	<b>21.0</b>	<b>39.6</b>	<b>47.2</b>	<b>40.1</b>	<b>0.0</b>	<b>4.0</b>	<b>12.9</b>	

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**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Pittsburgh CSA	2,105	664,504	100.0	62,375	21.1	9.4	9.1	17.5	19.0	18.7	20.6	22.9	21.9	40.8	43.5	37.9	0.0	5.3	12.4
<b>Total</b>	<b>2,105</b>	<b>664,504</b>	<b>100.0</b>	<b>62,375</b>	<b>21.1</b>	<b>9.4</b>	<b>9.1</b>	<b>17.5</b>	<b>19.0</b>	<b>18.7</b>	<b>20.6</b>	<b>22.9</b>	<b>21.9</b>	<b>40.8</b>	<b>43.5</b>	<b>37.9</b>	<b>0.0</b>	<b>5.3</b>	<b>12.4</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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2015-2016**

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	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Pittsburgh CSA	2,089	566,574	100.0	46,309	4.3	2.9	3.5	16.3	18.4	15.4	47.7	53.1	46.8	31.1	25.0	34.0	0.6	0.6	0.3
<b>Total</b>	<b>2,089</b>	<b>566,574</b>	<b>100.0</b>	<b>46,309</b>	<b>4.3</b>	<b>2.9</b>	<b>3.5</b>	<b>16.3</b>	<b>18.4</b>	<b>15.4</b>	<b>47.7</b>	<b>53.1</b>	<b>46.8</b>	<b>31.1</b>	<b>25.0</b>	<b>34.0</b>	<b>0.6</b>	<b>0.6</b>	<b>0.3</b>

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** 20

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
Pittsburgh CSA	835	241,170	100.0	46,309	4.7	3.0	3.5	16.4	20.4	15.4	43.5	45.5	46.8	34.7	30.8	34.0	0.7	0.4	0.3
Total	835	241,170	100.0	46,309	4.7	3.0	3.5	16.4	20.4	15.4	43.5	45.5	46.8	34.7	30.8	34.0	0.7	0.4	0.3

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2015-2016</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	
Pittsburgh CSA	2,089	566,574	100.0	46,309	81.6	53.7	46.6	6.4	31.9	12.0	14.4	
<b>Total</b>	<b>2,089</b>	<b>566,574</b>	<b>100.0</b>	<b>46,309</b>	<b>81.6</b>	<b>53.7</b>	<b>46.6</b>	<b>6.4</b>	<b>31.9</b>	<b>12.0</b>	<b>14.4</b>	
<i>Source: 2016 D&amp;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</i>												

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pittsburgh CSA	835	241,170	100.0	46,309	81.3	50.5	46.6	6.7	33.9	12.0	15.6
<b>Total</b>	<b>835</b>	<b>241,170</b>	<b>100.0</b>	<b>46,309</b>	<b>81.3</b>	<b>50.5</b>	<b>46.6</b>	<b>6.7</b>	<b>33.9</b>	<b>12.0</b>	<b>15.6</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015-2016**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Pittsburgh CSA	28	2,218	100.0	163	1.3	0.0	0.0	13.9	39.3	27.0	59.3	50.0	62.0	25.4	10.7	11.0	0.1	0.0	0.0
<b>Total</b>	<b>28</b>	<b>2,218</b>	<b>100.0</b>	<b>163</b>	<b>1.3</b>	<b>0.0</b>	<b>0.0</b>	<b>13.9</b>	<b>39.3</b>	<b>27.0</b>	<b>59.3</b>	<b>50.0</b>	<b>62.0</b>	<b>25.4</b>	<b>10.7</b>	<b>11.0</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Pittsburgh CSA	16	1,228	100.0	163	1.9	0.0	1.8	13.4	18.8	16.6	59.1	75.0	71.2	25.5	6.3	10.4	0.1	0.0	0.0
<b>Total</b>	<b>16</b>	<b>1,228</b>	<b>100.0</b>	<b>163</b>	<b>1.9</b>	<b>0.0</b>	<b>1.8</b>	<b>13.4</b>	<b>18.8</b>	<b>16.6</b>	<b>59.1</b>	<b>75.0</b>	<b>71.2</b>	<b>25.5</b>	<b>6.3</b>	<b>10.4</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2015-2016**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Pittsburgh CSA	28	2,218	100.0	163	96.4	71.4	54.6	2.2	0.0	1.5	28.6
Total	28	2,218	100.0	163	96.4	71.4	54.6	2.2	0.0	1.5	28.6

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 T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Pittsburgh CSA	16	1,228	100.0	163	96.3	100.0	54.6	2.3	0.0	1.4	0.0
<b>Total</b>	<b>16</b>	<b>1,228</b>	<b>100.0</b>	<b>163</b>	<b>96.3</b>	<b>100.0</b>	<b>54.6</b>	<b>2.3</b>	<b>0.0</b>	<b>1.4</b>	<b>0.0</b>

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

**Youngstown-Warren-Boardman, OH-PA MMSA**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: MULTI-STATE						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Youngstown MMSA	100.0	1,928	177,388	779	106,778	33	1,337	1	12,500	2,741	298,003	100.0

\* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2015 to December 31, 2017.

\*\*\* Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MULTI-STATE				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Youngstown MMSA	11	1,185	26	2,897	37	4,082	100.0	0	0

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: MULTI-STATE							
Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Youngstown MMSA	100.0	19	14.6	10.5	5.3	52.6	31.6	0	1	0	0	0	-1	8.7	15.4	50.3	25.7

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2015-2016**

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
Youngstown MMSA	1,353	256,014	100.0	11,953	4.2	0.5	0.7	13.4	8.9	6.6	58.1	63.6	61.4	24.2	26.9	31.3	0.0	0.0	0.0
<b>Total</b>	<b>1,353</b>	<b>256,014</b>	<b>100.0</b>	<b>11,953</b>	<b>4.2</b>	<b>0.5</b>	<b>0.7</b>	<b>13.4</b>	<b>8.9</b>	<b>6.6</b>	<b>58.1</b>	<b>63.6</b>	<b>61.4</b>	<b>24.2</b>	<b>26.9</b>	<b>31.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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
Youngstown MMSA	575	98,762	100.0	11,173	5.1	1.6	1.4	12.5	8.7	8.0	53.0	60.7	56.2	29.3	29.0	34.4	0.0	0.0	0.0
<b>Total</b>	575	98,762	<b>100.0</b>	11,173	5.1	1.6	1.4	12.5	8.7	8.0	53.0	60.7	56.2	29.3	29.0	34.4	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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2015-2016</b>		
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>				
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>		
Youngstown MMSA	1,353	256,014	100.0	11,953	20.1	7.1	6.9	18.0	19.6	19.9	22.3	23.9	22.5	39.6	43.9	33.7	0.0	5.5	17.1		
<b>Total</b>	1,353	256,014	<b>100.0</b>	11,953	20.1	7.1	6.9	18.0	19.6	19.9	22.3	23.9	22.5	39.6	43.9	33.7	0.0	5.5	17.1		

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Youngstown MMSA	575	98,762	100.0	11,173	20.5	6.6	7.2	18.4	19.5	19.7	20.6	25.9	23.1	40.5	41.9	33.9	0.0	6.1	16.0	
<b>Total</b>	<b>575</b>	<b>98,762</b>	<b>100.0</b>	<b>11,173</b>	<b>20.5</b>	<b>6.6</b>	<b>7.2</b>	<b>18.4</b>	<b>19.5</b>	<b>19.7</b>	<b>20.6</b>	<b>25.9</b>	<b>23.1</b>	<b>40.5</b>	<b>41.9</b>	<b>33.9</b>	<b>0.0</b>	<b>6.1</b>	<b>16.0</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*

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016**

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	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Youngstown MMSA	531	145,222	100.0	7,511	6.5	3.8	5.6	12.9	11.1	11.1	50.9	58.9	49.8	29.7	26.2	33.6	0.0	0.0	0.0
<b>Total</b>	<b>531</b>	<b>145,222</b>	<b>100.0</b>	<b>7,511</b>	<b>6.5</b>	<b>3.8</b>	<b>5.6</b>	<b>12.9</b>	<b>11.1</b>	<b>11.1</b>	<b>50.9</b>	<b>58.9</b>	<b>49.8</b>	<b>29.7</b>	<b>26.2</b>	<b>33.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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** **20**

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
Youngstown MMSA	248	68,334	100.0	7,511	8.0	7.3	5.6	12.7	10.5	11.1	44.3	51.2	49.8	34.9	31.0	33.6	0.0	0.0	0.0
<b>Total</b>	<b>248</b>	<b>68,334</b>	<b>100.0</b>	<b>7,511</b>	<b>8.0</b>	<b>7.3</b>	<b>5.6</b>	<b>12.7</b>	<b>10.5</b>	<b>11.1</b>	<b>44.3</b>	<b>51.2</b>	<b>49.8</b>	<b>34.9</b>	<b>31.0</b>	<b>33.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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 2015-2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Youngstown MMSA	531	145,222	100.0	7,511	79.8	57.1	43.7	6.9	29.2	13.4	13.7
<b>Total</b>	<b>531</b>	<b>145,222</b>	<b>100.0</b>	<b>7,511</b>	<b>79.8</b>	<b>57.1</b>	<b>43.7</b>	<b>6.9</b>	<b>29.2</b>	<b>13.4</b>	<b>13.7</b>

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**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Youngstown MMSA	248	68,334	100.0	7,511	79.5	47.6	43.7	7.0	30.2	13.5	22.2
<b>Total</b>	<b>248</b>	<b>68,334</b>	<b>100.0</b>	<b>7,511</b>	<b>79.5</b>	<b>47.6</b>	<b>43.7</b>	<b>7.0</b>	<b>30.2</b>	<b>13.5</b>	<b>22.2</b>

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015-2016**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Youngstown MMSA	19	1,504	100.0	108	1.8	0.0	0.0	5.2	0.0	0.9	70.8	100.0	82.4	22.2	0.0	16.7	0.0	0.0	0.0
<b>Total</b>	<b>19</b>	<b>1,504</b>	<b>100.0</b>	<b>108</b>	<b>1.8</b>	<b>0.0</b>	<b>0.0</b>	<b>5.2</b>	<b>0.0</b>	<b>0.9</b>	<b>70.8</b>	<b>100.0</b>	<b>82.4</b>	<b>22.2</b>	<b>0.0</b>	<b>16.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Youngstown MMSA	14	1,170	100.0	108	2.2	0.0	0.0	6.0	0.0	0.0	56.8	100.0	63.0	35.0	0.0	37.0	0.0	0.0	0.0
<b>Total</b>	<b>14</b>	<b>1,170</b>	<b>100.0</b>	<b>108</b>	<b>2.2</b>	<b>0.0</b>	<b>0.0</b>	<b>6.0</b>	<b>0.0</b>	<b>0.0</b>	<b>56.8</b>	<b>100.0</b>	<b>63.0</b>	<b>35.0</b>	<b>0.0</b>	<b>37.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2015-2016**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Youngstown MMSA	19	1,504	100.0	108	97.4	78.9	53.7	1.5	0.0	1.1	21.1
<b>Total</b>	<b>19</b>	<b>1,504</b>	<b>100.0</b>	<b>108</b>	<b>97.4</b>	<b>78.9</b>	<b>53.7</b>	<b>1.5</b>	<b>0.0</b>	<b>1.1</b>	<b>21.1</b>

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 T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Youngstown MMSA	14	1,170	100.0	108	97.3	92.9	53.7	1.5	0.0	1.2	7.1
<b>Total</b>	<b>14</b>	<b>1,170</b>	<b>100.0</b>	<b>108</b>	<b>97.3</b>	<b>92.9</b>	<b>53.7</b>	<b>1.5</b>	<b>0.0</b>	<b>1.2</b>	<b>7.1</b>

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

**State Rating**

**State of Maryland**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: STATE OF MARYLAND						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Washington CSA	100.00	873	392,612	249	49,087	3	134	9	53,900	1,125	441,833	100.00

\* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2015 to December 31, 2017.

\*\*\* Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: STATE OF MARYLAND				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Washington CSA	7	3,530	32	10,689	39	14,219	100.00	0	0

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: STATE OF MARYLAND							
Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Washington CSA	100.00	31	100.00	6.5	3.2	35.5	54.9	2	2	0	0	0	0	9.0	22.7	33.7	33.8

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2015-2016**

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
Washington CSA	915	320,087	100.0	138,807	21.5	6.7	6.5	17.3	13.4	15.7	20.7	18.8	18.9	40.5	56.0	35.4	0.0	5.1	23.5
<b>Total</b>	<b>915</b>	<b>320,087</b>	<b>100.0</b>	<b>138,807</b>	<b>21.5</b>	<b>6.7</b>	<b>6.5</b>	<b>17.3</b>	<b>13.4</b>	<b>15.7</b>	<b>20.7</b>	<b>18.8</b>	<b>18.9</b>	<b>40.5</b>	<b>56.0</b>	<b>35.4</b>	<b>0.0</b>	<b>5.1</b>	<b>23.5</b>

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
Washington CSA	873	392,612	100.0	114,267	22.4	5.0	8.3	16.9	11.0	18.6	19.6	17.5	20.4	41.1	64.5	33.5	0.0	1.9	19.3
<b>Total</b>	<b>873</b>	<b>392,612</b>	<b>100.0</b>	<b>114,267</b>	<b>22.4</b>	<b>5.0</b>	<b>8.3</b>	<b>16.9</b>	<b>11.0</b>	<b>18.6</b>	<b>19.6</b>	<b>17.5</b>	<b>20.4</b>	<b>41.1</b>	<b>64.5</b>	<b>33.5</b>	<b>0.0</b>	<b>1.9</b>	<b>19.3</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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																		<b>2015-2016</b>		
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Washington CSA	915	320,087	100.0	138,807	21.5	6.7	6.5	17.3	13.4	15.7	20.7	18.8	18.9	40.5	56.0	35.4	0.0	5.1	23.5	
<b>Total</b>	<b>915</b>	<b>320,087</b>	<b>100.0</b>	<b>138,807</b>	<b>21.5</b>	<b>6.7</b>	<b>6.5</b>	<b>17.3</b>	<b>13.4</b>	<b>15.7</b>	<b>20.7</b>	<b>18.8</b>	<b>18.9</b>	<b>40.5</b>	<b>56.0</b>	<b>35.4</b>	<b>0.0</b>	<b>5.1</b>	<b>23.5</b>	

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017</b>	
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Washington CSA	873	392,612	100.0	114,267	22.4	5.0	8.3	16.9	11.0	18.6	19.6	17.5	20.4	41.1	64.5	33.5	0.0	1.9	19.3	
<b>Total</b>	<b>873</b>	<b>392,612</b>	<b>100.0</b>	<b>114,267</b>	<b>22.4</b>	<b>5.0</b>	<b>8.3</b>	<b>16.9</b>	<b>11.0</b>	<b>18.6</b>	<b>19.6</b>	<b>17.5</b>	<b>20.4</b>	<b>41.1</b>	<b>64.5</b>	<b>33.5</b>	<b>0.0</b>	<b>1.9</b>	<b>19.3</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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016**

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	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Washington CSA	475	109,828	100.0	86,524	6.1	6.3	4.7	18.4	9.9	17.1	34.0	44.4	32.9	41.3	38.7	45.1	0.2	0.6	0.2
<b>Total</b>	<b>475</b>	<b>109,828</b>	<b>100.0</b>	<b>86,524</b>	<b>6.1</b>	<b>6.3</b>	<b>4.7</b>	<b>18.4</b>	<b>9.9</b>	<b>17.1</b>	<b>34.0</b>	<b>44.4</b>	<b>32.9</b>	<b>41.3</b>	<b>38.7</b>	<b>45.1</b>	<b>0.2</b>	<b>0.6</b>	<b>0.2</b>

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	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Washington CSA	249	49,087	100.0	86,524	5.2	6.8	4.7	17.1	26.1	17.1	35.3	34.5	32.9	41.8	32.5	45.1	0.6	0.0	0.2
<b>Total</b>	<b>249</b>	<b>49,087</b>	<b>100.0</b>	<b>86,524</b>	<b>5.2</b>	<b>6.8</b>	<b>4.7</b>	<b>17.1</b>	<b>26.1</b>	<b>17.1</b>	<b>35.3</b>	<b>34.5</b>	<b>32.9</b>	<b>41.8</b>	<b>32.5</b>	<b>45.1</b>	<b>0.6</b>	<b>0.0</b>	<b>0.2</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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 2015-2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington CSA	475	109,828	100.0	86,524	84.2	52.4	48.6	6.3	40.4	9.5	7.2
<b>Total</b>	<b>475</b>	<b>109,828</b>	<b>100.0</b>	<b>86,524</b>	<b>84.2</b>	<b>52.4</b>	<b>48.6</b>	<b>6.3</b>	<b>40.4</b>	<b>9.5</b>	<b>7.2</b>

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**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington CSA	249	49,087	100.0	86,524	84.7	49.8	48.6	6.1	35.7	9.2	14.5
<b>Total</b>	<b>249</b>	<b>49,087</b>	<b>100.0</b>	<b>86,524</b>	<b>84.7</b>	<b>49.8</b>	<b>48.6</b>	<b>6.1</b>	<b>35.7</b>	<b>9.2</b>	<b>14.5</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015-2016**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Washington CSA	2	85	100.0	210	2.4	0.0	0.5	11.0	0.0	3.3	37.4	0.0	36.2	49.1	100.0	60.0	0.0	0.0	0.0
<b>Total</b>	<b>2</b>	<b>85</b>	<b>100.0</b>	<b>210</b>	<b>2.4</b>	<b>0.0</b>	<b>0.5</b>	<b>11.0</b>	<b>0.0</b>	<b>3.3</b>	<b>37.4</b>	<b>0.0</b>	<b>36.2</b>	<b>49.1</b>	<b>100.0</b>	<b>60.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Washington CSA	3	134	100.0	210	2.1	0.0	0.5	14.0	0.0	8.1	34.9	33.3	38.1	48.9	66.7	53.3	0.1	0.0	0.0
<b>Total</b>	<b>3</b>	<b>134</b>	<b>100.0</b>	<b>210</b>	<b>2.1</b>	<b>0.0</b>	<b>0.5</b>	<b>14.0</b>	<b>0.0</b>	<b>8.1</b>	<b>34.9</b>	<b>33.3</b>	<b>38.1</b>	<b>48.9</b>	<b>66.7</b>	<b>53.3</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2015-2016**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Washington CSA	2	85	100.0	210	93.7	100.0	27.1	4.0	0.0	2.3	0.0
<b>Total</b>	<b>2</b>	<b>85</b>	<b>100.0</b>	<b>210</b>	<b>93.7</b>	<b>100.0</b>	<b>27.1</b>	<b>4.0</b>	<b>0.0</b>	<b>2.3</b>	<b>0.0</b>

*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*

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2017</b>
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Farms with Revenues &lt;= 1MM</b>			<b>Farms with Revenues &gt; 1MM</b>		<b>Farms with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>% Farms</b>	<b>% Bank Loans</b>
Washington CSA	3	134	100.0	210	93.6	66.7	27.1	4.0	33.3	2.4	0.0
<b>Total</b>	<b>3</b>	<b>134</b>	<b>100.0</b>	<b>210</b>	<b>93.6</b>	<b>66.7</b>	<b>27.1</b>	<b>4.0</b>	<b>33.3</b>	<b>2.4</b>	<b>0.0</b>
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0</i>											

## State of North Carolina

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF NORTH CAROLINA						Evaluation Period: MARCH 1, 2017 TO DECEMBER 31, 2017				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Fayetteville MSA	0.06	5	1,669	8	4,026	0	0	0	0	13	5,695	1.57
Greensboro CSA	3.38	512	87,908	226	49,692	7	828	0	0	745	138,428	36.63
Greenville MSA	0.58	103	17,831	24	4,303	0	0	0	0	127	22,134	3.11
Jacksonville MSA	0.11	10	2,407	15	3,894	0	0	0	0	25	6,301	1.01
Myrtle Beach MSA	0.52	104	20,117	11	3,153	0	0	0	0	115	23,270	3.80
NC Non-MSA	2.25	295	51,694	184	23,231	18	1,453	0	0	497	76,378	26.09
Raleigh CSA	1.28	149	60,010	131	31,623	2	400	0	0	282	92,033	20.47
Wilmington MSA	0.75	119	35,632	47	10,876	0	0	0	0	166	46,508	7.32

\* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2017 to December 31, 2017.

\*\*\* Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: STATE OF NORTH CAROLINA									
Evaluation Period: MARCH 1, 2017 TO DECEMBER 31, 2017									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Fayetteville MSA	1	250	0	0	1	250	2.1	0	0
Greensboro CSA	2	531	0	0	2	531	4.2	0	0
Greenville MSA	0	0	8	2,342	8	2,342	16.7	0	0
Jacksonville MSA	0	0	0	0	0	0	0.0	0	0
Myrtle Beach MSA	0	0	3	625	3	625	6.3	0	0
NC Non-MSA	1	471	5	1,125	6	1,596	12.5	0	0
Raleigh CSA	3	4,502	3	745	7	5,528	14.6	0	0
Wilmington MSA	0	0	5	1,125	5	1,125	10.4	0	0
<b>Statewide</b>	11	9,368	0	0	11	9,368	--	0	0
<b>Regional</b>	5	7,562	0	0	5	7,562	--	0	0

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: STATE OF NORTH CAROLINA							
Evaluation Period: MARCH 1, 2017 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Fayetteville MSA	1.57	1	1.3	0.0	0.0	100.0	0	0	0	0	0	0	0	0.6	16.9	62.9	18.4
Greensboro CSA	36.63	28	35.0	0.0	32.1	39.3	28.6	0	0	0	0	0	0	6.8	23.0	39.3	30.6
Greenville MSA	3.11	2	2.5	50.0	0	50.0	0	0	0	0	0	0	0	10.8	22.5	38.5	28.3
Jacksonville MSA	1.01	1	1.3	0	0	100.0	0	0	0	0	0	0	0	0.0	12.0	68.5	15.0
Myrtle Beach MSA	3.80	3	3.8	0	0	66.7	33.3	0	0	0	0	0	0	0.0	21.9	52.3	25.8
NC Non-MSA	26.09	26	32.5	0	11.5	65.4	23.1	0	0	0	0	0	0	0.0	13.4	53.9	32.8
Raleigh CSA	20.47	15	18.8	13.3	6.7	26.7	53.3	0	0	0	0	0	0	6.9	26.2	32.6	33.5
Wilmington MSA	7.32	4	5.0	25.0	25.0	25.0	25.0	0	0	0	0	0	0	13.2	17.0	40.1	29.7

**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
Fayetteville MSA	5	1,669	0.4	8,495	0.4	0.0	0.0	10.1	0.0	7.6	64.9	40.0	64.1	24.6	60.0	28.2	0.0	0.0	0.0
Greensboro CSA	512	87,908	39.5	35,297	3.1	1.6	1.8	17.4	13.9	14.0	42.7	37.5	41.0	36.8	46.9	43.2	0.0	0.2	0.0
Greenville MSA	103	17,831	7.9	3,884	4.5	7.8	6.9	19.5	1.9	10.4	40.3	48.5	44.0	35.7	41.7	38.7	0.0	0.0	0.0
Jacksonville MSA	10	2,407	0.8	7,469	0.0	0.0	0.0	3.8	0.0	2.6	76.3	50.0	79.2	19.9	50.0	18.2	0.0	0.0	0.0
Myrtle Beach MSA	104	20,117	8.0	7,190	0.0	0.0	0.0	19.0	17.3	13.2	52.9	50.0	51.9	28.1	32.7	34.9	0.0	0.0	0.0
NC Non-MSA	295	51,694	22.7	13,987	0.0	0.0	0.0	11.3	8.1	6.6	54.2	51.9	41.8	34.5	40.0	51.6	0.0	0.0	0.0
Raleigh CSA	149	60,010	11.5	60,977	2.4	1.3	2.4	22.1	19.5	20.8	36.0	35.6	38.0	39.5	43.6	38.8	0.0	0.0	0.0
Wilmington MSA	119	35,632	9.2	11,832	4.9	2.5	4.6	14.4	9.2	8.9	44.4	29.4	48.8	36.3	58.8	37.6	0.0	0.0	0.0
<b>Total</b>	<b>1,297</b>	<b>277,268</b>	<b>100.0</b>	<b>149,131</b>	<b>2.2</b>	<b>1.6</b>	<b>2.0</b>	<b>17.3</b>	<b>12.0</b>	<b>14.6</b>	<b>44.7</b>	<b>41.8</b>	<b>44.3</b>	<b>35.8</b>	<b>44.6</b>	<b>39.1</b>	<b>0.0</b>	<b>0.1</b>	<b>0.0</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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Fayetteville MSA	5	1,669	0.4	8,495	21.4	0.0	2.7	17.5	0.0	10.1	19.9	20.0	19.2	41.3	80.0	37.6	0.0	0.0	30.4
Greensboro CSA	512	87,908	39.5	35,297	22.1	7.6	5.2	17.7	21.5	16.4	18.4	22.5	21.2	41.9	44.1	39.8	0.0	4.3	17.5
Greenville MSA	103	17,831	7.9	3,884	24.2	1.0	2.7	16.2	11.7	12.5	17.5	25.2	19.3	42.1	61.2	45.9	0.0	1.0	19.6
Jacksonville MSA	10	2,407	0.8	7,469	18.2	0.0	2.3	18.6	30.0	13.8	23.9	0.0	25.0	39.3	70.0	31.0	0.0	0.0	27.9
Myrtle Beach MSA	104	20,117	8.0	7,190	18.6	5.8	2.1	17.3	4.8	10.4	20.3	28.8	17.4	43.7	58.7	56.7	0.0	1.9	13.5
NC Non-MSA	295	51,694	22.7	13,987	19.0	5.4	2.7	16.8	14.2	8.4	18.8	18.3	16.5	45.5	60.0	58.2	0.0	2.0	14.2
Raleigh CSA	149	60,010	11.5	60,977	21.8	2.7	6.4	16.8	14.8	17.0	18.6	21.5	21.4	42.8	52.3	41.5	0.0	8.7	13.7
Wilmington MSA	119	35,632	9.2	11,832	22.7	0.8	4.3	17.6	16.8	15.3	18.4	14.3	20.0	41.3	63.9	46.0	0.0	4.2	14.4
<b>Total</b>	<b>1,297</b>	<b>277,268</b>	<b>100.0</b>	<b>149,131</b>	<b>21.4</b>	<b>5.2</b>	<b>4.9</b>	<b>17.2</b>	<b>16.5</b>	<b>14.9</b>	<b>18.9</b>	<b>21.2</b>	<b>20.6</b>	<b>42.5</b>	<b>53.4</b>	<b>43.1</b>	<b>0.0</b>	<b>3.8</b>	<b>16.5</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

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

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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
Fayetteville MSA	8	4,026	1.2	3,973	1.8	0.0	9.2	19.4	50.0	7.5	58.4	0.0	43.9	20.1	50.0	39.4	0.3	0.0	0.0
Greensboro CSA	226	49,692	35.0	26,376	5.1	4.0	5.1	20.2	22.1	15.5	35.8	40.3	41.1	38.6	33.2	38.3	0.3	0.4	0.1
Greenville MSA	24	4,303	3.7	2,648	17.2	25.0	1.2	17.0	12.5	22.8	36.7	20.8	37.8	29.1	41.7	38.2	0.0	0.0	0.0
Jacksonville MSA	15	3,894	2.3	2,012	0.0	0.0	0.0	12.7	46.7	7.4	66.7	40.0	67.5	19.7	13.3	25.1	0.9	0.0	0.1
Myrtle Beach MSA	11	3,153	1.7	2,640	0.0	0.0	0.0	20.5	45.5	14.4	46.4	27.3	50.4	33.1	27.3	35.2	0.0	0.0	0.0
NC Non-MSA	184	23,231	28.5	10,141	0.0	0.0	0.7	12.2	13.0	5.7	48.5	60.3	50.0	39.2	26.6	43.7	0.0	0.0	0.0
Raleigh CSA	131	31,623	20.3	38,115	4.6	4.6	3.8	21.3	19.1	18.9	32.5	26.0	34.4	41.0	50.4	42.7	0.6	0.0	0.1
Wilmington MSA	47	10,876	7.3	8,561	13.5	8.5	5.4	12.1	14.9	11.4	33.6	29.8	40.8	40.4	46.8	42.2	0.3	0.0	0.2
<b>Total</b>	<b>646</b>	<b>130,798</b>	<b>100.0</b>	<b>94,466</b>	<b>4.8</b>	<b>3.9</b>	<b>4.0</b>	<b>18.9</b>	<b>19.4</b>	<b>15.1</b>	<b>38.0</b>	<b>40.9</b>	<b>40.2</b>	<b>37.9</b>	<b>35.8</b>	<b>40.7</b>	<b>0.4</b>	<b>0.2</b>	<b>0.1</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Fayetteville MSA	8	4,026	1.2	3,973	83.9	37.5	54.2	4.4	12.5	11.7	50.0
Greensboro CSA	226	49,692	35.0	26,376	83.5	49.1	49.3	5.9	42.9	10.7	8.0
Greenville MSA	24	4,303	3.7	2,648	80.9	33.3	46.3	5.6	58.3	13.4	8.3
Jacksonville MSA	15	3,894	2.3	2,012	84.0	46.7	50.8	4.0	40.0	12.0	13.3
Myrtle Beach MSA	11	3,153	1.7	2,640	88.1	63.6	50.4	3.5	18.2	8.4	18.2
NC Non-MSA	184	23,231	28.5	10,141	83.0	69.0	51.9	5.2	17.9	11.8	13.0
Raleigh CSA	131	31,623	20.3	38,115	85.5	45.0	50.7	4.9	44.3	9.6	10.7
Wilmington MSA	47	10,876	7.3	8,561	84.1	53.2	45.6	5.5	36.2	10.5	10.6
<b>Total</b>	<b>646</b>	<b>130,798</b>	<b>100.0</b>	<b>94,466</b>	<b>84.4</b>	<b>53.7</b>	<b>50.0</b>	<b>5.2</b>	<b>35.3</b>	<b>10.5</b>	<b>11.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Fayetteville MSA	0	0	0.0	43	0.2	0.0	4.7	9.8	0.0	2.3	62.6	0.0	74.4	27.3	0.0	18.6	0.0	0.0	0.0
Greensboro CSA	7	828	25.9	255	2.0	0.0	1.6	15.2	14.3	23.5	47.8	42.9	52.9	34.9	42.9	22.0	0.1	0.0	0.0
Greenville MSA	0	0	0.0	84	4.4	0.0	1.2	17.4	0.0	16.7	46.4	0.0	54.8	31.8	0.0	27.4	0.0	0.0	0.0
Jacksonville MSA	0	0	0.0	37	0.0	0.0	0.0	6.2	0.0	2.7	78.8	0.0	89.2	15.1	0.0	8.1	0.0	0.0	0.0
Myrtle Beach MSA	0	0	0.0	20	0.0	0.0	0.0	31.5	0.0	30.0	45.1	0.0	55.0	23.3	0.0	15.0	0.0	0.0	0.0
NC Non-MSA	18	1,453	66.7	770	0.0	0.0	0.0	10.9	16.7	10.8	62.7	72.2	74.9	26.5	11.1	14.3	0.0	0.0	0.0
Raleigh CSA	2	400	7.4	305	2.8	0.0	3.9	22.9	0.0	49.2	42.5	0.0	27.5	31.7	100.0	19.3	0.1	0.0	0.0
Wilmington MSA	0	0	0.0	62	7.2	0.0	11.3	25.9	0.0	54.8	37.5	0.0	17.7	29.2	0.0	16.1	0.2	0.0	0.0
<b>Total</b>	<b>27</b>	<b>2,681</b>	<b>100.0</b>	<b>1,576</b>	<b>2.0</b>	<b>0.0</b>	<b>1.7</b>	<b>17.4</b>	<b>14.8</b>	<b>22.1</b>	<b>50.0</b>	<b>59.3</b>	<b>58.9</b>	<b>30.5</b>	<b>25.9</b>	<b>17.3</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Fayetteville MSA	0	0	0.0	43	96.1	0.0	60.5	2.1	0.0	1.8	0.0
Greensboro CSA	7	828	25.9	255	97.0	57.1	53.7	1.9	28.6	1.2	14.3
Greenville MSA	0	0	0.0	84	95.3	0.0	63.1	3.6	0.0	1.1	0.0
Jacksonville MSA	0	0	0.0	37	95.5	0.0	56.8	2.1	0.0	2.4	0.0
Myrtle Beach MSA	0	0	0.0	20	96.1	0.0	45.0	2.3	0.0	1.6	0.0
NC Non-MSA	18	1,453	66.7	770	97.3	72.2	53.2	1.6	11.1	1.1	16.7
Raleigh CSA	2	400	7.4	305	94.6	50.0	56.4	3.1	50.0	2.4	0.0
Wilmington MSA	0	0	0.0	62	94.2	0.0	45.2	3.7	0.0	2.1	0.0
<b>Total</b>	<b>27</b>	<b>2,681</b>	<b>100.0</b>	<b>1,576</b>	<b>96.0</b>	<b>66.7</b>	<b>54.3</b>	<b>2.4</b>	<b>18.5</b>	<b>1.6</b>	<b>14.8</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

State of Ohio

**Table 1. Lending Volume**

LENDING VOLUME												Geography: STATE OF OHIO		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017	
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
Cleveland CSA	97.08	2,730	553,941	630	151,728	0	0	1	2,200	3,361	707,869	96.25			
Wheeling MSA	2.92	75	9,619	26	1,932	0	0	0	0	101	11,551	3.75			

\* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2015 to December 31, 2017.

\*\*\* Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: STATE OF OHIO				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Cleveland CSA	11	2,851	25	5,707	37	8,558	99.7	0	0
Wheeling MSA	1	25	0	0	1	25	0.3	0	0

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: STATE OF OHIO							
Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cleveland CSA	96.25	21	95.5	0.0	9.5	14.3	76.2	3	0	0	0	3	0	11.9	19.9	36.2	31.7
Wheeling MSA	3.75	1	4.5	0.0	0.0	100.0	0.0	0	1	0	0	-1	0	0.0	18.7	66.6	14.7

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-2016**

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
Cleveland CSA	1,761	369,802	96.9	77,516	5.4	1.2	1.9	15.1	5.3	10.5	42	29.9	41.5	37.5	63.6	46.1	0	0	0
Wheeling MSA	57	7,871	3.1	1,278	2.5	1.8	1.9	13.2	1.8	12.4	67.5	64.9	60.5	16.7	31.6	25.3	0	0	0
<b>Total</b>	<b>1,818</b>	<b>377,673</b>	<b>100.0</b>	<b>78,794</b>	<b>2.5</b>	<b>1.8</b>	<b>1.9</b>	<b>13.2</b>	<b>1.8</b>	<b>12.4</b>	<b>67.5</b>	<b>64.9</b>	<b>60.5</b>	<b>16.7</b>	<b>31.6</b>	<b>25.3</b>	<b>0</b>	<b>0</b>	<b>0</b>

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
Cleveland CSA	969	184,139	98.2	72,497	6.3	3.8	3.5	16.6	15.6	13.9	39.6	26.8	41.0	37.3	53.8	41.5	0.1	0.0	0.1
Wheeling MSA	18	1,748	1.8	1,272	0	0	0	15.9	16.7	14.3	72.6	83.3	70	11.4	0	15.7	0	0	0
<b>Total</b>	<b>987</b>	<b>185,887</b>	<b>100.0</b>	<b>73,769</b>	<b>3.8</b>	<b>1.9</b>	<b>2.7</b>	<b>14.8</b>	<b>12.0</b>	<b>13.9</b>	<b>50.3</b>	<b>52.1</b>	<b>48.1</b>	<b>31.1</b>	<b>33.9</b>	<b>35.2</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</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

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2015-2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland CSA	1761	369,802	96.9	77,516	21.5	4.7	7.9	17.4	12.8	18.1	21.0	17.8	20.3	40.1	62.4	38.0	0.0	2.4	15.7
Wheeling MSA	57	7,871	3.1	1,278	19.9	10.5	7.6	20.4	15.8	20.1	21.4	12.3	20.5	38.3	57.9	33.9	0.0	3.5	17.9
<b>Total</b>	<b>1,818</b>	<b>377,673</b>	<b>100.0</b>	<b>78,794</b>	<b>20.4</b>	<b>8.6</b>	<b>7.1</b>	<b>17.9</b>	<b>17.6</b>	<b>17.2</b>	<b>21.7</b>	<b>22.2</b>	<b>20.6</b>	<b>40.1</b>	<b>48.2</b>	<b>37.2</b>	<b>0.0</b>	<b>3.5</b>	<b>17.9</b>

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**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland CSA	969	184,139	98.2	72,497	22.4	5.3	7.7	16.7	16.8	19.2	19.7	21.5	21.1	41.1	54.2	36.9	0.0	2.3	15.1
Wheeling MSA	18	1,748	1.8	1,272	18.8	22.2	7.9	19.9	11.1	17.8	21.2	22.2	19.7	40.0	44.4	35.2	0.0	0.0	19.4
<b>Total</b>	<b>987</b>	<b>185,887</b>	<b>100.0</b>	<b>73,769</b>	<b>21.3</b>	<b>7.8</b>	<b>8.0</b>	<b>17.4</b>	<b>17.2</b>	<b>18.9</b>	<b>20.5</b>	<b>23.0</b>	<b>21.6</b>	<b>40.8</b>	<b>48.0</b>	<b>35.8</b>	<b>0.0</b>	<b>3.9</b>	<b>15.7</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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016**

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	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Cleveland CSA	401	94,434	94.0	49,218	7.6	4.5	6.1	13.7	14.2	11.9	37.8	40.2	36.1	40.5	40.9	45.7	0.3	0.2	0.1
Wheeling MSA	26	3,864	6.0	743	6.4	0.0	6.2	12.4	11.5	13.2	50.7	73.1	46.2	30.5	15.4	34.5	0.0	0.0	0.0
<b>Total</b>	<b>427</b>	<b>98,298</b>	<b>100.0</b>	<b>49,961</b>	<b>7.6</b>	<b>4.2</b>	<b>6.1</b>	<b>13.7</b>	<b>14.1</b>	<b>12.0</b>	<b>38.1</b>	<b>42.2</b>	<b>36.3</b>	<b>40.3</b>	<b>39.3</b>	<b>45.6</b>	<b>0.3</b>	<b>0.2</b>	<b>0.1</b>

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	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Cleveland CSA	229	55,362	100.0	49,218	8.7	5.7	6.1	15.8	18.3	11.9	34.1	28.4	36.1	40.9	47.2	45.7	0.6	0.4	0.1
Wheeling MSA	0	0	0.0	743	0.0	0.0	6.2	16.2	0.0	13.2	65.4	0.0	46.2	18.4	0.0	34.5	0.0	0.0	0.0
<b>Total</b>	<b>229</b>	<b>55,362</b>	<b>100.0</b>	<b>49,961</b>	<b>8.5</b>	<b>5.7</b>	<b>6.1</b>	<b>15.8</b>	<b>18.3</b>	<b>12.0</b>	<b>34.7</b>	<b>28.4</b>	<b>36.3</b>	<b>40.4</b>	<b>47.2</b>	<b>45.6</b>	<b>0.6</b>	<b>0.4</b>	<b>0.1</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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 2015-2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cleveland CSA	401	94,434	94.0	49,218	81.5	52.1	44.4	7.5	41.6	11.0	6.2
Wheeling MSA	26	3,864	6.0	743	78.5	57.7	37.7	5.3	30.8	16.2	11.5
<b>Total</b>	<b>427</b>	<b>98,298</b>	<b>100.0</b>	<b>49,961</b>	<b>81.4</b>	<b>52.5</b>	<b>44.3</b>	<b>7.4</b>	<b>41.0</b>	<b>11.1</b>	<b>6.6</b>

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**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cleveland CSA	229	55,362	100.0	49,218	81.5	47.6	44.4	7.5	39.3	11.0	13.1
Wheeling MSA	0	0	0.0	743	78.2	0.0	37.7	5.5	0.0	16.2	0.0
<b>Total</b>	<b>229</b>	<b>55,362</b>	<b>100.0</b>	<b>49,961</b>	<b>81.4</b>	<b>47.6</b>	<b>44.3</b>	<b>7.5</b>	<b>39.3</b>	<b>11.1</b>	<b>13.1</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

## State of Pennsylvania

### Table 1. Lending Volume - Pennsylvania

LENDING VOLUME												Geography: STATE OF PENNSYLVANIA		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017	
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
Altoona MSA	6.68	634	67,450	282	37,545	15	1,142	0	0	931	106,137	6.37			
East Stroudsburg MSA	0.72	51	6,496	48	7,325	1	6	0	0	100	13,827	0.92			
Erie MSA	8.93	732	84,655	502	75,818	9	790	1	3,300	1,244	164,563	9.00			
Harrisburg CSA	7.64	702	169,686	360	77,834	1	74	1	2,750	1,064	250,344	23.85			
Johnstown MSA	10.84	1,124	76,007	377	33,413	9	963	0	0	1,510	110,383	7.79			
Lancaster MSA	2.89	212	81,613	191	44,375	0	0	0	0	403	125,988	7.79			
PA Non-MSA	42.77	3,914	349,844	1,885	210,296	157	12,840	4	11,500	5,960	584,480	29.20			
Philadelphia CSA	2.81	291	52,479	100	18,148	0	0	0	0	391	70,627	3.55			
Scranton MSA	7.75	663	91,537	410	68,098	5	647	2	3,000	1,080	163,282	6.54			
State College MSA	7.17	657	134,531	292	36,610	48	2,856	2	9,500	999	183,497	7.73			
Williamsport MSA	1.81	180	25,837	67	11,429	4	97	1	5,000	252	42,363	1.45			

\* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2015 to December 31, 2017.

\*\*\* Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: STATE OF PENNSYLVANIA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Altoona MSA	4	62	1	4,100	5	4,162	7.1	0	0
East Stroudsburg MSA	1	150	0	0	1	150	1.4	0	0
Erie MSA	11	6,181	1	2,900	12	9,081	17.1	0	0
Harrisburg CSA	8	4,013	5	10,625	15	14,938	21.4	0	0
Johnstown MSA	5	3,198	1	5,000	6	8,198	8.6	0	0
Lancaster MSA	2	450	5	1,682	7	2,132	10.0	0	0
PA Non-MSA	9	4,052	4	18,664	13	22,716	18.6	0	0
Philadelphia CSA	3	261	2	1,000	5	1,261	7.1	0	0
Scranton MSA	1	2,280	1	2,630	2	4,910	2.9	0	0
State College MSA	2	156	1	1,000	3	1,156	4.3	0	0
Williamsport MSA	1	38	0	0	1	38	1.4	0	0
<b>Statewide</b>	<b>8</b>	<b>13,320</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>13,320</b>	<b>--</b>	<b>0</b>	<b>0</b>

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: STATE OF PENNSYLVANIA							
Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Altoona MSA	6.37	11	7.3	0.0	9.1	90.9	0.0	0	0	0	0	0	0	6.0	11.3	74.0	8.8
East Stroudsburg MSA	0.92	1	0.7	0.0	0.0	100.0	0.0	0	0	0	0	0	0	0.0	11.2	83.4	0.00
Erie MSA	9.00	11	7.3	9.1	9.1	63.6	18.2	0	0	0	0	0	0	9.6	12.9	46.3	30.4
Harrisburg CSA	23.85	23	15.2	0.0	21.7	73.9	4.4	0	4	-1	-1	0	-2	6.7	13.0	59.0	20.7
Johnstown MSA	7.79	14	9.3	0.0	35.7	42.9	21.4	0	2	0	0	-2	0	1.8	16.5	55.1	26.6
Lancaster MSA	7.79	6	4.0	0.0	33.3	66.7	0.0	0	0	0	0	0	0	4.3	10.6	73.6	11.6
PA Non-MSA	29.20	51	33.8	3.9	17.3	69.2	9.6	0	2	0	0	-2	0	1.2	8.4	79.6	9.2
Philadelphia CSA	3.55	7	4.6	0.0	14.3	85.7	0.0	0	3	0	0	-2	-1	9.2	11.8	47.9	30.7
Scranton MSA	6.54	12	7.9	8.3	25.0	50.0	16.7	0	2	0	0	-1	-1	3.2	20.5	52.2	23.6
State College MSA	7.73	13	8.6	0.0	30.8	7.7	38.5	1	2	1	-1	-1	0	3.3	20.9	40.6	22.9
Williamsport MSA	1.45	2	1.3	50.0	0.0	50.0	0.0	0	1	0	-1	0	0	5.8	11.7	75.9	6.6

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-2016**

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
Altoona MSA	452	48,343	7.0	2,803	0.3	0.0	0.2	9.0	6.2	7.5	79.4	78.8	78.1	11.3	15.0	14.2	0.0	0.0	0.0
East Stroudsburg MSA	37	5,161	0.6	4,895	0.0	0.0	0.0	3.8	0.0	6.4	79.5	83.8	75.1	16.6	16.2	18.5	0.0	0.0	0.0
Erie MSA	527	60,648	8.2	6,003	3.9	2.3	1.8	13.4	16.3	10.7	47.7	43.6	43.6	34.9	37.8	43.9	0.0	0.0	0.0
Harrisburg CSA	411	107,349	6.4	35,289	2.3	0.7	1.0	10.1	7.8	9.0	61.5	50.6	59.7	26.2	40.9	30.4	0.0	0.0	0.0
Johnstown MSA	835	57,503	13.0	2,691	0.0	0.0	0.0	13.2	8.6	6.7	66.5	69.6	69.3	20.3	21.8	24.0	0.0	0.0	0.0
Lancaster MSA	106	55,226	1.6	14,693	1.9	3.8	2.1	6.5	10.4	7.2	78.0	59.4	76.2	13.7	26.4	14.5	0.0	0.0	0.0
PA Non-MSA	2,860	256,344	44.5	17,328	0.2	0.0	0.1	6.9	4.5	4.6	79.9	84.3	79.2	13.1	11.2	16.2	0.0	0.0	0.0
Philadelphia CSA	148	31,575	2.3	29,747	3.9	10.1	2.2	9.4	5.4	9.3	51.1	44.6	50.1	35.6	39.9	38.4	0.0	0.0	0.0
Scranton MSA	451	62,086	7.0	11,331	0.7	0.4	0.7	14.4	7.1	10.5	61.7	62.1	61.1	23.2	30.4	27.7	0.0	0.0	0.0
State College MSA	461	89,368	7.2	3,457	0.0	0.2	0.2	12.9	12.4	9.5	59.4	57.5	57.2	27.7	29.9	33.0	0.0	0.0	0.1
Williamsport MSA	140	20,173	2.2	2,423	1.3	1.4	1.2	3.3	2.1	3.1	87.4	85.0	87.4	8.0	11.4	8.4	0.0	0.0	0.0
<b>Total</b>	<b>6,428</b>	<b>793,776</b>	<b>100.0</b>	<b>130,660</b>	<b>1.7</b>	<b>0.6</b>	<b>1.2</b>	<b>9.3</b>	<b>7.1</b>	<b>8.2</b>	<b>66.2</b>	<b>71.7</b>	<b>63.0</b>	<b>22.7</b>	<b>20.6</b>	<b>27.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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
Altoona MSA	182	19,107	6.6	2,789	3.1	2.2	2.6	9.0	9.3	9.0	77.6	76.4	77.3	10.2	12.1	11.1	0.0	0.0	0.0
East Stroudsburg MSA	14	1,335	0.5	4,816	0.0	0.0	0.0	8.0	0.0	9.0	86.4	100.0	86.5	5.6	0.0	4.5	0.0	0.0	0.0
Erie MSA	205	24,007	7.5	5,384	4.5	2.4	1.8	8.8	14.6	8.3	50.6	44.9	49.3	36.2	38.0	40.7	0.0	0.0	0.0
Harrisburg CSA	298	64,016	10.9	32,236	2.9	2.3	2.2	10.0	7.0	9.7	63.1	55.4	61.9	24.0	35.2	26.2	0.0	0.0	0.0
Johnstown MSA	289	18,504	10.6	2,411	1.4	1.0	0.8	13.3	9.0	7.8	59.3	61.2	58.4	26.0	28.7	33.0	0.0	0.0	0.0
Lancaster MSA	106	26,387	3.9	13,440	1.6	0.9	2.3	8.8	7.5	11.3	76.1	69.8	72.9	13.5	21.7	13.5	0.0	0.0	0.0
PA Non-MSA	1,054	93,500	38.5	16,060	0.5	0.1	0.4	6.9	4.8	4.9	82.8	86.3	82.4	9.7	8.7	12.3	0.0	0.0	0.0
Philadelphia CSA	143	20,904	5.2	26,479	4.3	14.0	3.8	10.0	7.7	11.0	50.7	51.7	50.2	34.9	26.6	35.0	0.0	0.0	0.0
Scranton MSA	212	29,451	7.7	10,667	1.6	0.5	1.5	14.2	11.3	13.1	56.5	58.5	53.6	27.6	29.2	31.8	0.0	0.5	0.1
State College MSA	196	45,163	7.2	3,019	0.0	0.0	0.0	16.0	13.8	15.8	51.7	41.8	47.7	31.5	42.3	35.0	0.8	2.0	1.5
Williamsport MSA	40	5,664	1.5	2,278	1.4	2.5	1.9	7.2	12.5	8.9	84.3	75.0	81.4	7.0	10.0	7.8	0.0	0.0	0.0
<b>Total</b>	<b>2,739</b>	<b>348,038</b>	<b>52.9</b>	<b>119,579</b>	<b>2.2</b>	<b>1.6</b>	<b>2.1</b>	<b>9.7</b>	<b>8.0</b>	<b>9.8</b>	<b>66.2</b>	<b>68.7</b>	<b>63.3</b>	<b>21.9</b>	<b>21.5</b>	<b>24.8</b>	<b>0.0</b>	<b>0.2</b>	<b>0.0</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

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2015-2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Altoona MSA	452	48,343	7.0	2,803	19.4	12.6	8.4	18.3	17.5	17.8	23.0	24.1	22.4	39.3	43.1	35.9	0.0	2.7	15.5
East Stroudsburg MSA	37	5,161	0.6	4,895	20.1	5.4	3.9	17.3	5.4	14.3	22.9	27.0	22.0	39.8	59.5	37.7	0.0	2.7	22.1
Erie MSA	527	60,648	8.2	6,003	20.8	8.7	6.4	18.0	15.6	17.8	21.2	19.2	22.6	40.0	51.0	41.7	0.0	5.5	11.4
Harrisburg CSA	411	107,349	6.4	35,289	18.1	3.9	7.2	18.5	16.1	18.3	23.8	18.5	21.0	39.7	51.3	32.4	0.0	10.2	21.1
Johnstown MSA	835	57,503	13.0	2,691	18.9	11.3	9.3	19.6	20.5	16.4	22.0	24.7	21.0	39.5	42.6	36.7	0.0	1.0	16.6
Lancaster MSA	106	55,226	1.6	14,693	17.4	5.7	6.1	19.1	9.4	20.2	24.8	22.6	23.2	38.8	52.8	32.8	0.0	9.4	17.8
PA Non-MSA	2,860	256,344	44.5	17,328	17.9	9.1	5.9	19.6	21.3	17.7	22.9	24.6	24.1	39.6	43.0	38.6	0.0	2.1	13.6
Philadelphia CSA	148	31,575	2.3	29,747	18.7	10.1	6.8	16.7	16.9	17.9	22.7	21.6	22.2	41.9	47.3	38.1	0.0	4.1	15.1
Scranton MSA	451	62,086	7.0	11,331	20.3	6.7	8.1	18.0	20.2	17.7	21.7	22.6	21.6	40.0	45.9	36.3	0.0	4.7	16.2
State College MSA	461	89,368	7.2	3,457	18.3	9.1	6.9	19.0	15.4	16.2	22.8	25.6	23.4	39.9	47.1	41.8	0.0	2.8	11.7
Williamsport MSA	140	20,173	2.2	2,423	18.8	10.7	5.2	18.9	22.9	16.1	23.2	20.7	23.9	39.0	44.3	42.3	0.0	1.4	12.6
<b>Total</b>	<b>6,428</b>	<b>793,776</b>	<b>100.0</b>	<b>130,660</b>	<b>18.6</b>	<b>9.1</b>	<b>6.8</b>	<b>18.4</b>	<b>19.2</b>	<b>18.0</b>	<b>23.0</b>	<b>23.5</b>	<b>22.2</b>	<b>40.0</b>	<b>45.0</b>	<b>36.1</b>	<b>0.0</b>	<b>3.2</b>	<b>16.9</b>

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**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Altoona MSA	182	19,107	6.6	2,789	19.9	9.9	10.0	18.7	21.4	22.2	21.9	26.4	24.2	39.5	40.1	29.3	0.0	2.2	14.4
East Stroudsburg MSA	14	1,335	0.5	4,816	20.7	0.0	7.3	18.1	14.3	19.0	21.3	28.6	21.6	39.9	50.0	31.0	0.0	7.1	21.2
Erie MSA	205	24,007	7.5	5,384	21.1	7.3	7.6	17.6	12.7	19.3	20.8	23.4	23.3	40.5	48.3	40.8	0.0	8.3	9.1
Harrisburg CSA	298	64,016	10.9	32,236	19.4	7.7	7.6	18.3	15.1	20.0	22.3	15.4	22.6	40.0	51.7	32.8	0.0	10.1	17.1
Johnstown MSA	289	18,504	10.6	2,411	19.5	12.8	11.4	19.4	21.5	18.9	20.8	28.7	23.9	40.3	34.3	31.5	0.0	2.8	14.3
Lancaster MSA	106	26,387	3.9	13,440	18.3	3.8	6.8	19.2	14.2	20.3	23.1	19.8	24.8	39.4	57.5	33.8	0.0	4.7	14.3
PA Non-MSA	1,054	93,500	38.5	16,060	19.4	8.2	6.6	18.8	18.8	18.9	21.9	26.2	24.0	40.0	44.7	37.9	0.0	2.2	12.6
Philadelphia CSA	143	20,904	5.2	26,479	20.0	13.3	7.4	17.0	15.4	19.0	21.3	23.1	22.4	41.7	44.8	37.6	0.0	3.5	13.6
Scranton MSA	212	29,451	7.7	10,667	21.3	8.0	7.2	17.6	13.7	17.9	20.5	20.8	22.2	40.6	51.9	36.9	0.0	5.7	15.8
State College MSA	196	45,163	7.2	3,019	19.6	7.1	7.0	18.5	15.3	15.8	21.5	23.0	23.0	40.3	50.5	42.5	0.0	4.1	11.7
Williamsport MSA	40	5,664	1.5	2,278	20.0	7.5	6.1	18.7	17.5	18.1	22.1	30.0	24.0	39.2	42.5	38.4	0.0	2.5	13.4
<b>Total</b>	<b>2,739</b>	<b>348,038</b>	<b>100.0</b>	<b>119,579</b>	<b>19.8</b>	<b>8.6</b>	<b>7.4</b>	<b>18.2</b>	<b>17.3</b>	<b>19.3</b>	<b>21.7</b>	<b>24.1</b>	<b>23.0</b>	<b>40.3</b>	<b>45.8</b>	<b>35.6</b>	<b>0.0</b>	<b>4.2</b>	<b>14.8</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*

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016**

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	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Altoona MSA	179	46,902	5.9	1,575	3.7	0.0	1.8	12.6	9.5	9.9	70.4	78.8	72.9	13.4	11.7	15.4	0.0	0.0	0.0
East Stroudsburg MSA	31	7,844	1.0	2,843	0.0	0.0	0.0	3.1	0.0	2.8	85.4	90.3	82.5	11.5	9.7	14.6	0.0	0.0	0.0
Erie MSA	303	85,922	10.1	3,726	11.9	13.2	10.4	14.0	14.5	13.1	43.2	39.3	43.8	30.9	33.0	32.7	0.0	0.0	0.0
Harrisburg CSA	198	41,827	6.6	15,993	4.0	6.1	2.9	16.6	18.7	12.5	54.9	47.5	55.3	24.5	27.8	29.3	0.0	0.0	0.0
Johnstown MSA	275	46,270	9.1	1,706	0.0	0.0	0.0	12.6	8.7	10.7	68.1	72.4	68.7	19.3	18.9	20.6	0.0	0.0	0.0
Lancaster MSA	81	40,372	2.7	11,595	5.5	1.2	4.2	5.9	4.9	4.5	75.2	74.1	77.5	13.3	19.8	13.8	0.0	0.0	0.0
PA Non-MSA	1,359	302,414	45.1	12,271	0.2	0.8	0.3	10.2	6.1	8.3	74.8	80.7	75.2	14.7	12.4	16.1	0.2	0.0	0.1
Philadelphia CSA	58	22,758	1.9	20,010	4.7	13.8	3.3	10.8	8.6	10.2	45.4	53.4	44.8	39.0	24.1	41.7	0.0	0.0	0.0
Scranton MSA	291	96,282	9.7	9,258	5.6	1.0	4.3	14.9	14.4	12.7	58.7	64.6	59.5	20.6	19.9	23.4	0.1	0.0	0.1
State College MSA	186	46,092	6.2	1,953	6.5	4.3	6.0	10.6	18.3	11.9	48.5	56.5	49.9	31.1	21.0	32.0	3.3	0.0	0.2
WilliamSPORT MSA	50	15,412	1.7	1,485	4.1	4.0	2.9	4.1	2.0	3.6	84.2	86.0	85.2	7.5	8.0	8.3	0.0	0.0	0.0
<b>Total</b>	<b>3,011</b>	<b>396,961</b>	<b>100.0</b>	<b>82,415</b>	<b>4.1</b>	<b>2.8</b>	<b>3.2</b>	<b>11.8</b>	<b>9.7</b>	<b>9.7</b>	<b>60.4</b>	<b>69.9</b>	<b>60.8</b>	<b>23.6</b>	<b>17.6</b>	<b>26.4</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

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	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Altoona MSA	103	28,188	6.8	1,575	8.3	0.0	1.8	8.5	0.0	9.9	76.3	0.0	72.9	7.0	0.0	15.4	0.0	0.0	0.0
East Stroudsburg MSA	17	6,806	1.1	2,843	0.0	0.0	0.0	20.9	0.0	2.8	74.1	0.0	82.5	5.0	0.0	14.6	0.0	0.0	0.0
Erie MSA	199	65,714	13.2	3,726	12.8	0.0	10.4	12.1	0.0	13.1	45.3	0.0	43.8	29.9	0.0	32.7	0.0	0.0	0.0
Harrisburg CSA	163	36,107	10.8	15,993	6.4	7.4	2.9	15.1	17.2	12.5	58.1	49.7	55.3	20.4	25.8	29.3	0.0	0.0	0.0
Johnstown MSA	102	20,556	6.8	1,706	1.8	0.0	0.0	19.0	0.0	10.7	48.3	0.0	68.7	30.9	0.0	20.6	0.0	0.0	0.0
Lancaster MSA	110	48,378	7.3	11,595	4.2	0.0	4.2	11.4	0.0	4.5	72.4	0.0	77.5	12.0	0.0	13.8	0.0	0.0	0.0
PA Non-MSA	526	118,178	35.0	12,271	2.7	0.0	0.3	9.5	0.0	8.3	76.2	0.0	75.2	11.4	0.0	16.1	0.2	0.0	0.1
Philadelphia CSA	42	13,538	2.8	20,010	5.5	0.0	3.3	10.2	0.0	10.2	48.4	0.0	44.8	35.9	0.0	41.7	0.0	0.0	0.0
Scranton MSA	119	39,914	7.9	9,258	2.7	0.0	4.3	19.2	0.0	12.7	51.9	0.0	59.5	24.1	0.0	23.4	2.1	0.0	0.1
State College MSA	106	27,128	7.0	1,953	2.0	0.0	6.0	18.5	0.0	11.9	39.4	0.0	49.9	29.9	0.0	32.0	10.3	0.0	0.2
Williamsport MSA	17	7,446	1.1	1,485	5.5	0.0	2.9	17.0	0.0	3.6	71.4	0.0	85.2	6.1	0.0	8.3	0.0	0.0	0.0

<b>Total</b>	<b>1,504</b>	<b>224,030</b>	<b>100.0</b>	<b>82,415</b>	<b>5.7</b>	<b>0.0</b>	<b>4.4</b>	<b>15.3</b>	<b>0.0</b>	<b>13.5</b>	<b>43.8</b>	<b>0.0</b>	<b>44.1</b>	<b>34.5</b>	<b>0.0</b>	<b>37.8</b>	<b>0.6</b>	<b>0.0</b>	<b>0.1</b>
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Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Altoona MSA	103	28,188	6.8	1,575	78.2	59.2	39.4	7.5	21.4	14.3	19.4
East Stroudsburg MSA	17	6,806	1.1	2,843	86.1	52.9	52.5	4.4	29.4	9.6	17.6
Erie MSA	199	65,714	13.2	3,726	78.6	48.7	41.4	7.9	30.7	13.5	20.6
Harrisburg CSA	163	36,107	10.8	15,993	81.0	52.1	46.3	6.2	37.4	12.9	10.4
Johnstown MSA	102	20,556	6.8	1,706	77.5	54.9	43.9	6.7	24.5	15.8	20.6
Lancaster MSA	110	48,378	7.3	11,595	83.5	53.6	45.4	7.0	32.7	9.5	13.6
PA Non-MSA	526	118,178	35.0	12,271	80.4	50.4	45.8	6.1	35.2	13.5	14.4
Philadelphia CSA	42	13,538	2.8	20,010	84.3	52.4	46.8	6.6	23.8	9.1	23.8
Scranton MSA	119	39,914	7.9	9,258	82.0	60.5	45.8	6.0	32.8	11.9	6.7
State College MSA	106	27,128	7.0	1,953	79.9	65.1	44.9	5.6	26.4	14.5	8.5
Williamsport MSA	17	7,446	1.1	1,485	80.1	64.7	39.4	6.0	29.4	13.9	5.9
<b>Total</b>	<b>1,504</b>	<b>224,030</b>	<b>100.0</b>	<b>82,415</b>	<b>81.8</b>	<b>53.6</b>	<b>45.8</b>	<b>6.4</b>	<b>31.7</b>	<b>11.8</b>	<b>14.7</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015-2016**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Altoona MSA	11	1,836	6.6	36	0.5	0.0	0.0	2.8	0.0	0.0	91.1	81.8	100.0	5.6	18.2	0.0	0.0	0.0	0.0
East Stroudsburg MSA	0	0	0.0	10	0.0	0.0	0.0	3.5	0.0	0.0	80.0	0.0	70.0	16.5	0.0	30.0	0.0	0.0	0.0
Erie MSA	2	510	1.2	38	1.5	0.0	0.0	9.2	0.0	18.4	63.2	50.0	65.8	26.1	50.0	15.8	0.0	0.0	0.0
Harrisburg CSA	0	0	0.0	475	0.5	0.0	0.2	5.4	0.0	2.9	70.6	0.0	87.2	23.5	0.0	9.7	0.0	0.0	0.0
Johnstown MSA	8	1,794	4.8	24	0.0	0.0	0.0	5.8	0.0	0.0	77.0	100.0	91.7	17.3	0.0	8.3	0.0	0.0	0.0
Lancaster MSA	0	0	0.0	1,196	0.8	0.0	0.0	1.5	0.0	0.1	89.3	0.0	94.1	8.5	0.0	5.9	0.0	0.0	0.0
PA Non-MSA	111	17,988	66.9	775	0.0	0.0	0.0	2.4	0.9	0.9	84.9	94.6	87.6	12.7	4.5	11.5	0.0	0.0	0.0
Philadelphia CSA	0	0	0.0	563	0.9	0.0	0.0	11.1	0.0	16.5	54.4	0.0	69.4	33.5	0.0	14.0	0.0	0.0	0.0
Scranton MSA	5	1,294	3.0	36	0.5	0.0	0.0	7.7	0.0	2.8	63.2	100.0	75.0	28.6	0.0	22.2	0.0	0.0	0.0
State College MSA	27	3,414	16.3	121	0.0	0.0	0.0	13.1	70.4	44.6	63.2	29.6	43.8	22.9	0.0	11.6	0.8	0.0	0.0
Williamsport MSA	2	66	1.2	56	0.0	0.0	0.0	0.6	0.0	0.0	92.8	100.0	98.2	6.6	0.0	1.8	0.0	0.0	0.0
<b>Total</b>	<b>166</b>	<b>13,451</b>	<b>100.0</b>	<b>3,330</b>	<b>0.5</b>	<b>0.0</b>	<b>0.0</b>	<b>5.6</b>	<b>12.0</b>	<b>5.3</b>	<b>73.6</b>	<b>83.1</b>	<b>85.1</b>	<b>20.2</b>	<b>4.8</b>	<b>9.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Altoona MSA	4	448	4.8	36	1.0	0.0	0.0	4.5	0.0	0.0	88.1	75.0	100.0	6.5	25.0	0.0	0.0	0.0	0.0
East Stroudsburg MSA	1	12	1.2	10	0.0	0.0	0.0	6.1	0.0	0.0	84.3	100.0	70.0	9.6	0.0	30.0	0.0	0.0	0.0
Erie MSA	7	1,070	8.4	38	2.3	0.0	0.0	6.3	0.0	13.2	47.2	0.0	44.7	44.3	100.0	42.1	0.0	0.0	0.0
Harrisburg CSA	1	74	1.2	475	1.1	0.0	0.0	4.7	0.0	1.3	73.3	100.0	89.5	20.9	0.0	9.3	0.0	0.0	0.0
Johnstown MSA	1	132	1.2	24	0.5	0.0	0.0	8.2	0.0	0.0	58.4	100.0	70.8	32.9	0.0	29.2	0.0	0.0	0.0
Lancaster MSA	0	0	0.0	1,196	0.7	0.0	0.0	2.9	0.0	0.1	85.6	0.0	95.6	10.8	0.0	4.3	0.0	0.0	0.0
PA Non-MSA	46	7,692	55.4	775	0.2	0.0	0.0	1.4	0.0	0.1	86.6	93.5	92.4	11.7	6.5	7.5	0.0	0.0	0.0
Philadelphia CSA	0	0	0.0	563	1.3	0.0	0.2	10.7	0.0	15.3	57.6	0.0	73.0	30.4	0.0	11.5	0.0	0.0	0.0
Scranton MSA	0	0	0.0	36	1.3	0.0	0.0	9.9	0.0	5.6	54.4	0.0	77.8	34.5	0.0	16.7	0.0	0.0	0.0
State College MSA	21	2,298	25.3	121	0.5	0.0	0.0	16.1	76.2	43.8	54.8	14.3	39.7	27.5	9.5	16.5	1.0	0.0	0.0
WilliamSPORT MSA	2	128	2.4	56	0.3	0.0	0.0	3.7	0.0	0.0	91.7	100.0	98.2	4.3	0.0	1.8	0.0	0.0	0.0
<b>Total</b>	<b>83</b>	<b>5,964</b>	<b>100.0</b>	<b>3,330</b>	<b>0.8</b>	<b>0.0</b>	<b>0.0</b>	<b>5.7</b>	<b>19.3</b>	<b>4.6</b>	<b>72.9</b>	<b>65.1</b>	<b>87.2</b>	<b>20.5</b>	<b>15.7</b>	<b>8.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2015-2016</b>											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Altoona MSA	11	1,836	6.6	36	96.7	63.6	22.2	2.8	18.2	0.5	18.2
East Stroudsburg MSA	0	0	0.0	10	96.5	0.0	50.0	1.3	0.0	2.2	0.0
Erie MSA	2	510	1.2	38	96.8	100.0	42.1	2.3	0.0	0.9	0.0
Harrisburg CSA	0	0	0.0	475	96.8	0.0	65.1	1.8	0.0	1.4	0.0
Johnstown MSA	8	1,794	4.8	24	97.8	12.5	20.8	1.3	50.0	0.9	37.5
Lancaster MSA	0	0	0.0	1,196	96.3	0.0	81.9	2.8	0.0	0.9	0.0
PA Non-MSA	111	17,988	66.9	775	97.7	82.9	61.5	1.7	5.4	0.6	11.7
Philadelphia CSA	0	0	0.0	563	94.5	0.0	66.8	4.2	0.0	1.4	0.0
Scranton MSA	5	1,294	3.0	36	97.1	60.0	58.3	2.1	0.0	0.8	40.0
State College MSA	27	3,414	16.3	121	96.7	100.0	83.5	1.3	0.0	2.1	0.0
Williamsport MSA	2	66	1.2	56	97.5	50.0	60.7	1.9	0.0	0.6	50.0
<b>Total</b>	<b>166</b>	<b>13,451</b>	<b>100.0</b>	<b>3,330</b>	<b>96.5</b>	<b>80.1</b>	<b>70.0</b>	<b>2.5</b>	<b>7.2</b>	<b>1.1</b>	<b>12.7</b>

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

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2017</b>
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Farms with Revenues &lt;= 1MM</b>			<b>Farms with Revenues &gt; 1MM</b>		<b>Farms with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>% Farms</b>	<b>% Bank Loans</b>
Altoona MSA	4	448	4.8	36	95.5	100.0	22.2	4.0	0.0	0.5	0.0
East Stroudsburg MSA	1	12	1.2	10	97.8	100.0	50.0	0.9	0.0	1.3	0.0
Erie MSA	7	1,070	8.4	38	95.8	100.0	42.1	3.1	0.0	1.0	0.0
Harrisburg CSA	1	74	1.2	475	96.9	100.0	65.1	1.7	0.0	1.4	0.0
Johnstown MSA	1	132	1.2	24	97.3	0.0	20.8	1.8	100.0	0.9	0.0
Lancaster MSA	0	0	0.0	1,196	96.0	0.0	81.9	3.0	0.0	1.0	0.0
PA Non-MSA	46	7,692	55.4	775	97.5	76.1	61.5	1.9	13.0	0.6	10.9
Philadelphia CSA	0	0	0.0	563	94.4	0.0	66.8	4.2	0.0	1.4	0.0
Scranton MSA	0	0	0.0	36	97.2	0.0	58.3	2.1	0.0	0.6	0.0
State College MSA	21	2,298	25.3	121	96.9	90.5	83.5	1.3	0.0	1.8	9.5
Williamsport MSA	2	128	2.4	56	97.5	100.0	60.7	1.5	0.0	0.9	0.0
<b>Total</b>	<b>83</b>	<b>5,964</b>	<b>100.0</b>	<b>3,330</b>	<b>96.4</b>	<b>83.1</b>	<b>70.0</b>	<b>2.6</b>	<b>8.4</b>	<b>1.0</b>	<b>8.4</b>
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0</i>											

State of South Carolina

**Table 1. Lending Volume – South Carolina**

LENDING VOLUME												Geography: STATE OF SOUTH CAROLINA		Evaluation Period: MARCH 1, 2017 TO DECEMBER 31, 2017	
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
SC Non-MSA	100.00	7	467	12	1,896	0	0	0	0	23	11,363	100.00			

\* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2017 to December 31, 2017.

\*\*\* Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: STATE OF SOUTH CAROLINA				Evaluation Period: MARCH 1, 2017 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
SC Non-MSA	0	0	0	0	0	0	100.0	0	0
Statewide	2	1,024	0	0	2	1,024	--	0	0

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: STATE OF SOUTH CAROLINA							
Evaluation Period: MARCH 1, 2017 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
SC Non-MSA	100.00	2	100.0	0.0	0.0	100.0	0.0	0	0	0	0	2	0	0.0	27.5	51.4	21.1

**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
SC Non-MSA	7	467	100.0	824	0.0	0.0	0.0	23.1	28.6	17.1	52.8	71.4	48.9	24.0	0.0	34.0	0.0	0.0	0.0
<b>Total</b>	<b>7</b>	<b>467</b>	<b>100.0</b>	<b>824</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>23.1</b>	<b>28.6</b>	<b>17.1</b>	<b>52.8</b>	<b>71.4</b>	<b>48.9</b>	<b>24.0</b>	<b>0.0</b>	<b>34.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
SC Non-MSA	7	467	100.0	824	23.7	0.0	2.7	16.5	14.3	14.9	18.0	42.9	24.5	41.8	42.9	37.5	0.0	0.0	20.4
<b>Total</b>	<b>7</b>	<b>467</b>	<b>100.0</b>	<b>824</b>	<b>23.7</b>	<b>0.0</b>	<b>2.7</b>	<b>16.5</b>	<b>14.3</b>	<b>14.9</b>	<b>18.0</b>	<b>42.9</b>	<b>24.5</b>	<b>41.8</b>	<b>42.9</b>	<b>37.5</b>	<b>0.0</b>	<b>0.0</b>	<b>20.4</b>
<i>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</i>																			

**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
SC Non-MSA	12	1,896	100.0	530	0.0	0.0	0.0	22.0	8.3	11.5	61.5	66.7	47.2	16.6	25.0	41.3	0.0	0.0	0.0
<b>Total</b>	<b>12</b>	<b>1,896</b>	<b>100.0</b>	<b>530</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>22.0</b>	<b>8.3</b>	<b>11.5</b>	<b>61.5</b>	<b>66.7</b>	<b>47.2</b>	<b>16.6</b>	<b>25.0</b>	<b>41.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
SC Non-MSA	12	1,896	100.0	530	77.7	66.7	48.5	4.9	16.7	17.4	16.7
<b>Total</b>	<b>12</b>	<b>1,896</b>	<b>100.0</b>	<b>530</b>	<b>77.7</b>	<b>66.7</b>	<b>48.5</b>	<b>4.9</b>	<b>16.7</b>	<b>17.4</b>	<b>16.7</b>
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0</i>											