

# **PUBLIC DISCLOSURE**

December 2, 2013

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Ohio Heritage Bank  
200 Main Street  
Coshocton, Ohio 43812  
RSSD# 2347044

Federal Reserve Bank of Cleveland  
P.O. Box 6387  
Cleveland, OH 44101-1387

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## TABLE OF CONTENTS

Institution’s CRA Rating .....	1
Scope of Examination .....	2
Description of Institution .....	4
Conclusions with Respect to Performance Tests .....	6
Columbus Metropolitan Statistical Area (Full-scope review)	
a) Description of Institution’s Operations .....	10
b) Conclusions with Respect to Performance Tests .....	16
Coshocton-Knox-Tuscarawas Non-Metropolitan Ohio (Full-scope review)	
a) Description of Institution’s Operations .....	23
b) Conclusions with Respect to Performance Tests .....	28
Appendix A: Assessment Area Map .....	33
Appendix B: Lending Tables .....	35
Appendix C: Glossary of Terms .....	40

**INSTITUTION'S CRA RATING: This institution is rated Satisfactory.**

- The loan-to-deposit ratio is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and assessment area credit needs;
- A substantial majority of loans and other lending-related activities are in the assessment area;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment areas;
- Distributions of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income),
- Distributions of loans to businesses reflects a reasonable penetration among businesses of different sizes given the demographics of the assessment areas, and;
- There were no CRA-related complaints filed against the bank since the previous CRA examination.

The bank was evaluated as a small bank and was rated "Satisfactory" at the previous CRA evaluation dated September 6, 2011.

### SCOPE OF EXAMINATION

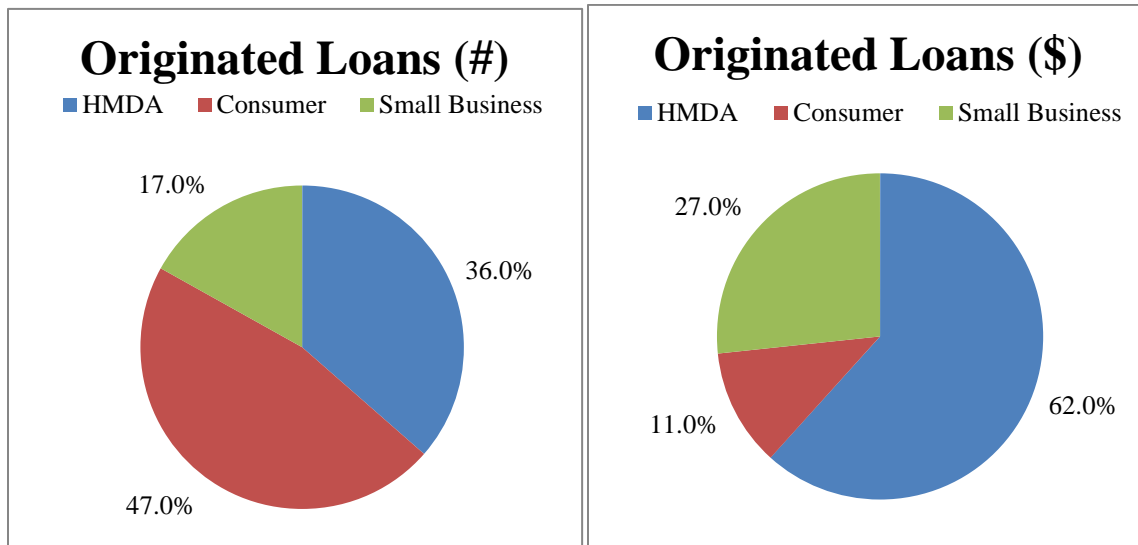
The CRA public evaluation is based on loans originated from January 1, 2012 to June 30, 2013. The bank’s lending activity for this period was evaluated using the interagency small bank examination procedures.

The loan products evaluated include mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), consumer loans, and small business loans. HMDA loans are comprised of home purchase, refinance, and home improvement loans. Consumer loans are comprised of motor vehicle, home equity lines of credit, and other secured and unsecured loans.

The following table and charts indicate the volume of loans originated during the evaluation period.

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
HMDA	388	42,744
Consumer	497	8,066
Small Business	180	18,475
<b>Total</b>	<b>1,065</b>	<b>69,285</b>

Note: In some cases information for originated loans could not be provided by the bank. Therefore, the loan volumes used for the borrower distribution are based on a sample of originated loans and are lower than the number of originated loans listed above.



Given the above distribution, HMDA lending received the greatest weight in this analysis, since these loans comprise 36.0% of the loans originated by volume and 62.0% by dollar amount during this evaluation period. This is followed by consumer lending (47.0% by volume, 11.0% by dollar amount) and small business lending (17.0% by volume, 27.0% dollar amount).

Ohio Heritage delineated two assessment areas. The non-metropolitan area is comprised of the entireties of Coshocton, Knox, and Tuscarawas Counties. The Columbus Metropolitan Statistical Area 18140 (MSA) is comprised of the entirety of Licking County. A description of each assessment area is presented in subsequent sections of this performance evaluation. Full scope reviews were conducted for both assessment areas.

The non-metropolitan assessment area received the greater weight in this analysis since 75.0% of HMDA loans by volume (70.0% by dollar amount) were originated in the assessment area during this evaluation period. Similarly, 90.0% of consumer loans by volume (91.0% by dollar amount) and 66.0% of small business loans by volume (69.0% by dollar amount) were originated in the nonmetropolitan assessment area.

## DESCRIPTION OF INSTITUTION

The financial holding company, Ohio Heritage Bancorp, Inc., owns Ohio Heritage Bank and Coshocton County Title Agency, LLC. In addition, Ohio Heritage Bank owns Ohio Heritage Financial Services, which offers full-service securities brokerage and insurance products. All of these entities are located in Coshocton, Ohio.

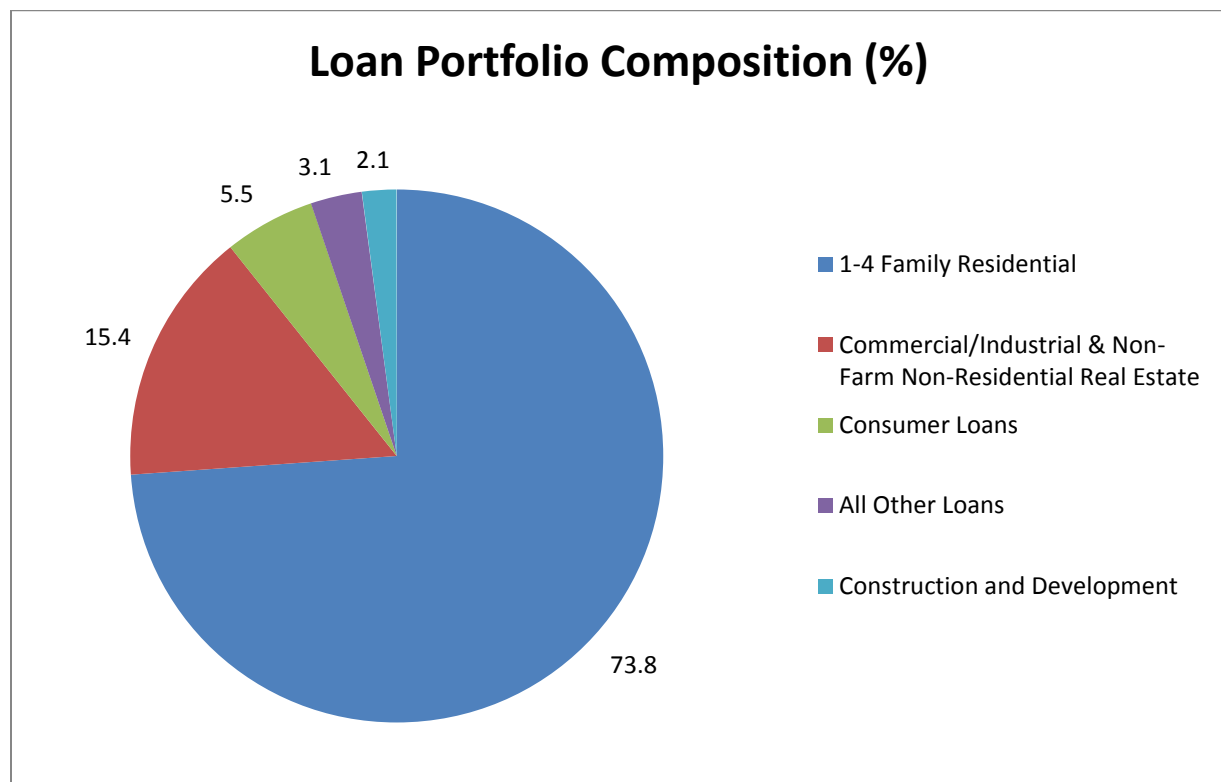
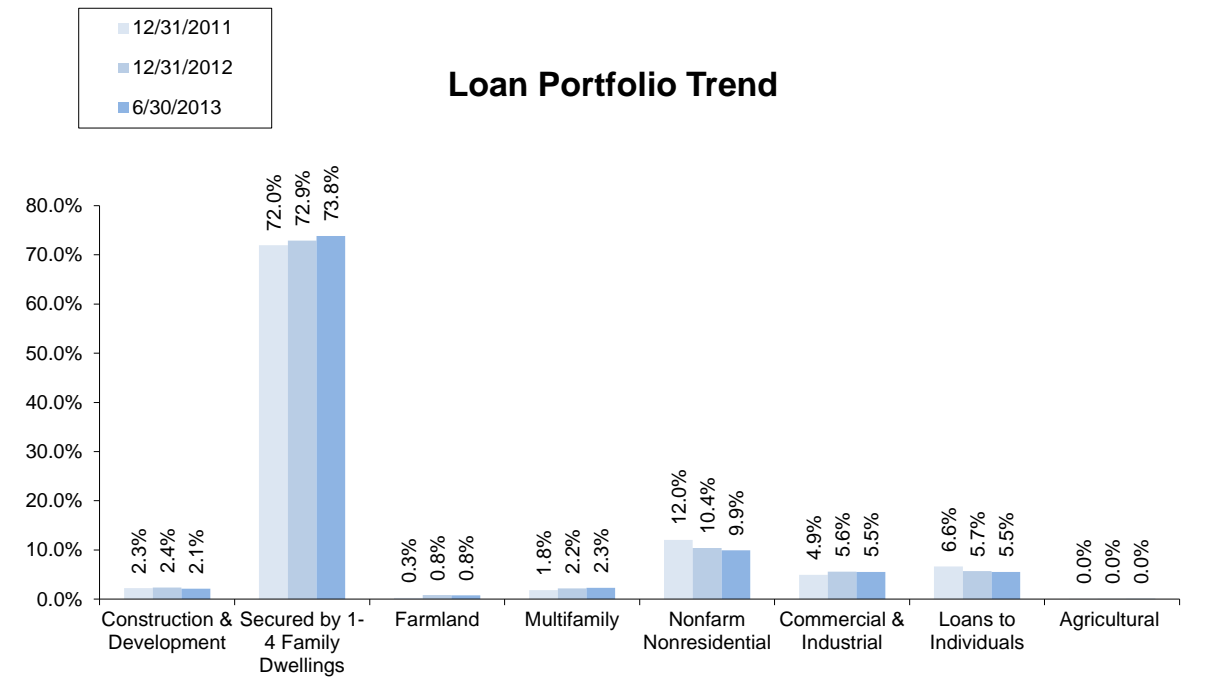
According to the June 30, 2013 Uniform Bank Performance Report (UBPR), Ohio Heritage has total assets of \$253.6 million, a 7.7% decrease from the \$274.8 million since the previous CRA evaluation in September 2011.

Ohio Heritage serves its assessment areas through one main office and five branch offices. The main office and one branch office (each with a full-service ATM) are located in Coshocton County (Coshocton). Ohio Heritage also has two branch offices with full-service ATMs in Licking County (Newark and Heath) and one office in Knox County (Mount Vernon). Ohio Heritage also has a branch office in Tuscarawas County (New Philadelphia) that does not have a full-service ATM. Ohio Heritage has not opened or closed any branches since the previous evaluation.

Ohio Heritage is a full-service retail bank offering business and consumer deposit accounts and commercial, residential mortgage, and consumer loans. The following charts represent the bank's loan portfolio as of June 30, 2013.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2013		12/31/2012		12/31/2011	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	3,799	2.1%	4,223	2.4%	4,129	2.3%
Secured by One- to Four- Family Dwellings	131,915	73.8%	129,821	72.9%	131,393	72.0%
Other Real Estate: Farmland	1,381	0.8%	1,478	0.8%	507	0.3%
Other Real Estate: Multifamily	4,112	2.3%	3,878	2.2%	3,374	1.8%
Other Real Estate: Nonfarm nonresidential	17,718	9.9%	18,486	10.4%	21,973	12.0%
Commercial and Industrial	9,884	5.5%	10,002	5.6%	9,006	4.9%
Loans to Individuals	9,901	5.5%	10,157	5.7%	12,126	6.6%
Agricultural Loans	56	0.0%	58	0.0%	88	0.0%
<b>Total</b>	<b>\$178,766</b>	<b>100.00%</b>	<b>\$178,103</b>	<b>100.00%</b>	<b>\$182,596</b>	<b>100.00%</b>

\* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.



There are no legal or financial constraints preventing Ohio Heritage from meeting the credit needs of its assessment area consistent with its asset size, business strategy, resources, and local economy.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### Loan-to-Deposit Ratio

A financial institution's loan-to-deposit (LTD) ratio compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution's lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing the total by the number of quarters.

Ohio Heritage's LTD ratio is reasonable given the bank's size, financial condition, and assessment area credit needs. The bank has averaged 96.27% over the past eight quarters of operation and is above the aggregate peer group average ratio of 69.87%, as well as the local peer average of 85.17%. Ohio Heritage's LTD ratio over the last eight quarters has declined slightly from a high of 101.64% as of September 30, 2011, reaching a low of 93.30% as of March 31, 2012 before rising to 97.80% as of June 30, 2013.

The following table shows Ohio Heritage's quarterly LTD ratios for eight quarters since the previous evaluation, along with the average LTD ratio for the same period.

<b>Loan-to Deposit Ratios</b>			
As of Date	Net Loans (000s)	Total Deposits (000s)	Ratio
June 30, 2013	175,789	179,745	97.80
March 31, 2013	175,219	182,437	96.04
December 31, 2012	175,144	183,134	95.64
September 30, 2012	175,951	186,588	94.30
June 30, 2012	176,195	187,550	93.95
March 31, 2012	174,403	186,923	93.30
December 31, 2011	179,797	184,456	97.47
September 30, 2011	183,978	181,012	101.64
<b>Quarterly Loan-to-Deposit Ratio Average since the previous examination</b>			96.27

The following table shows Ohio Heritage's quarterly LTD ratios for eight quarters since the previous evaluation, compared to the national peer ratio, as well as three local peer institutions, and average of the local peer institutions.



<b>Ohio Heritage Bank, Loan-to-Deposit Ratios</b>						
<b>As of Date</b>	<b>Ohio Heritage Bank</b>	<b>Aggregate Ratio</b>	<b>FIRST FED CMNTY BK NA</b>	<b>FIRST NB</b>	<b>HOME LOAN SVG BK</b>	<b>Custom Peer</b>
June 30, 2013	97.80	69.83	94.97	61.36	104.64	86.99
March 31, 2013	96.04	67.17	93.51	58.07	107.13	86.24
December 31, 2012	95.64	68.92	91.84	56.82	106.76	85.14
September 30, 2012	94.30	69.99	94.57	57.06	104.76	85.46
June 30, 2012	93.95	70.33	97.73	57.06	101.01	85.27
March 31, 2012	93.30	68.47	95.56	56.65	98.32	83.51
December 31, 2011	97.47	71.39	0	57.12	102.12	79.62
September 30, 2011	101.64	72.82	0	57.03	100.66	78.85
<b>Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation</b>	<b>96.27</b>	<b>69.87</b>	<b>94.70</b>	<b>57.65</b>	<b>103.18</b>	<b>85.17</b>

**Lending in the Assessment Area**

The table below depicts Ohio Heritage’s volume of loans extended inside and outside of the bank’s assessment area during the evaluation period.

Lending Inside and Outside the Assessment Area								
Loan Type - Description	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Equity	63	95.5	3,112	98.1	3	4.5	60	1.9
Motor Vehicle	62	91.2	848	91.7	6	8.8	77	8.3
Direct Consumer	335	92.3	3,700	93.2	28	7.7	269	6.8
<b>Total Consumer-related</b>	<b>460</b>	<b>92.6</b>	<b>7,660</b>	<b>95.0</b>	<b>37</b>	<b>7.4</b>	<b>406</b>	<b>5.0</b>
Home Purchase - Conventional	220	90.5	22,693	89.0	23	9.5	2,814	11.0
Home Improvement	35	89.7	2,066	78.7	4	10.3	559	21.3
Multi-Family Housing	6	100.0	1,490	100.0	0	0.0	0	0.0
Refinancing	93	93.0	12,573	95.8	7	7.0	549	4.2
<b>Total HMDA-related</b>	<b>354</b>	<b>91.2</b>	<b>38,822</b>	<b>90.8</b>	<b>34</b>	<b>8.8</b>	<b>3,922</b>	<b>9.2</b>
Small Business	168	93.3	16,885	91.4	12	6.7	1,590	8.6
<b>Total Small Bus.-related</b>	<b>168</b>	<b>93.3</b>	<b>16,885</b>	<b>91.4</b>	<b>12</b>	<b>6.7</b>	<b>1,590</b>	<b>8.6</b>
<b>TOTAL LOANS</b>	<b>982</b>	<b>92.2</b>	<b>63,367</b>	<b>91.5</b>	<b>83</b>	<b>7.8</b>	<b>5,918</b>	<b>8.5</b>

The bank's lending in consumer loans, HMDA loans, and small business loans were analyzed to determine the volume of lending inside and outside the bank's assessment area. Of the loans made to consumers, 92.6% by volume and 95.0% by dollar amount were made within the bank's assessment area. Of HMDA-related loans, 91.2% by volume and 90.8% by dollar amount were made within the bank's assessment area. Of the loans made to small businesses, 93.3% by volume and 91.4% by dollar amount were made within the bank's assessment area. Therefore, a substantial majority of the bank's loans by both volume and dollar amount were made inside its assessment area.

### **Geographic Distribution of Lending**

Ohio Heritage's geographic distribution of lending is considered reasonable. This reflects the bank's lending performance in all assessment areas in comparison to the demographics of the areas. The respective analysis can be found within subsequent sections of this report.

### **Borrower Distribution of Lending**

Ohio Heritage's lending to borrowers of different income categories and lending to businesses of different revenue sizes is considered reasonable. This reflects the bank's performance in all assessment areas in comparison to the demographic data. The respective analysis can be found within subsequent sections of this report.

### **Response to Consumer Complaints**

The bank has not received any CRA-related complaints since the previous examination.

**Fair Lending or Other Illegal Credit Practices Review**

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**DESCRIPTION OF NON-METROPOLITAN ASSESSMENT AREA**  
(Full-scope Review)

The non-metropolitan assessment area consists of Coshocton, Knox, and Tuscarawas Counties in eastern-central Ohio. Of the 43 tracts in the assessment area, eight are moderate-income, 30 are middle-income, and five are upper-income geographies. Seven of the middle-income tracts were considered distressed in 2012 due to the poverty rate.

Ohio Heritage serves this assessment area via its main office and three branch offices. The main office and one branch office in Coshocton, Ohio are both located in moderate-income census tracts. The branch office in Mount Vernon, Ohio is located in an upper-income census tract. The branch office in New Philadelphia, Ohio is located in a middle-income census tract and is the only office without a full-service ATM.

Coshocton County is located in eastern-central Ohio. Coshocton is the largest city and county seat. Knox County is also located in eastern-central Ohio. Mount Vernon is the county seat and the largest city. Tuscarawas County is located in the eastern part of Ohio. New Philadelphia is the largest city and the county seat.

As of June 30, 2013, the Federal Deposit Insurance Corporation (FDIC) reported 22 insured financial institutions operating 72 branches within the assessment area. The FDIC’s market share report<sup>1</sup> indicates that Ohio Heritage ranked seventh among these institutions, holding 6.37% of the market share of deposits. The following table illustrates the deposit market share for the top ten institutions in the assessment area by deposit market share.

#	Financial Institution	Deposit Market Share
1	The Park National Bank	18.92%
2	The Huntington National Bank	14.00%
3	JPMorgan Chase Bank, National Association	10.30%
4	First Federal Community Bank, National Association	8.09%
5	PNC Bank, National Association	7.58%
6	The First National Bank of Dennison	7.57%
7	Ohio Heritage Bank	6.37%
8	The Home Loan Savings Bank	5.35%
9	The Commercial and Savings Bank of Millersburg, Ohio	3.54%
10	The Killbuck Savings Bank Company	3.52%

Two community contact interviews were conducted in conjunction with this examination. The community contacts provided context to the demographic and economic characteristics of the assessment area. One contact was conducted with an economic development organization in Coshocton County and the other contact was conducted with a housing agency in Knox County.

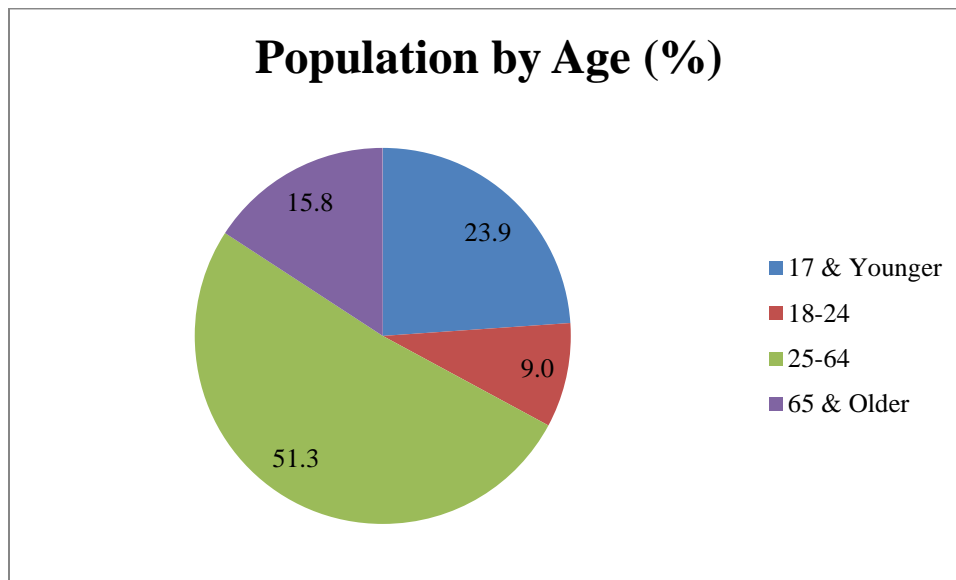
<sup>1</sup> FDIC Summary of Deposits, [www.fdic.gov](http://www.fdic.gov)

**Population**

2010 U.S. Census Bureau data indicates that the population in the bank’s assessment area is 190,404. The following table depicts the 2010 and estimated 2012 populations of the three counties within the non-metropolitan assessment area, as well as the estimated population change<sup>2</sup>:

County	2010 Population	2012 Population	Population Percent Change
Coshocton	36,901	36,779	-0.3%
Knox	60,921	60,705	-0.4%
Tuscarawas	92,582	92,392	-0.2%
<b>Total</b>	<b>190,404</b>	<b>189,876</b>	

Approximately 23.9% of the population is under 18, while 76.1% of the population is 18 years or older, which is the legal age to enter into a contract. The following chart illustrates the population, by age, within the assessment area.



There are no low-income tracts in the Non-Metropolitan Ohio assessment area and 16.0% of the population lives in moderate-income, 71.0% in middle-income, and 13.1% in upper-income tracts.

<sup>2</sup> American Fact Finder, <http://factfinder2.census.gov>

**Income Characteristics**

The following table depicts the median family income (MFI) for each of the counties in the non-metropolitan assessment area for 2012 and 2013. The MFI in Coshocton and Tuscarawas Counties declined from 2012 and is lower than the MFI for all of non-metropolitan Ohio for 2013.<sup>3</sup>

County	2012 MFI	2013 MFI
Coshocton	\$52,000	\$50,900
Knox	\$57,600	\$59,400
Tuscarawas	\$54,900	\$50,100
Non-metropolitan Ohio	\$53,600	\$53,000

In 2010, the non-metropolitan assessment area contained 73,292 households, of which 50,208 (68.5%) are designated as families. Low- and moderate- income families represent 18.4% and 19.4% of all families in the assessment area respectively. In addition, 9.8% of families in the assessment area live below the poverty level compared to 10.3 % for Ohio.

The following table shows poverty rates for Non-metropolitan Ohio for 1999 and 2011:

County	1999 Poverty Rate	2011 Poverty Rate	Change
Coshocton	9.1%	16.7%	83.5%
Knox	10.1%	13.0%	28.7%
Tuscarawas	9.4%	13.7%	45.7%
<b>Ohio</b>	<b>10.6%</b>	<b>16.4%</b>	54.7%
<b>United States</b>	<b>12.4%</b>	<b>15.9%</b>	28.2%

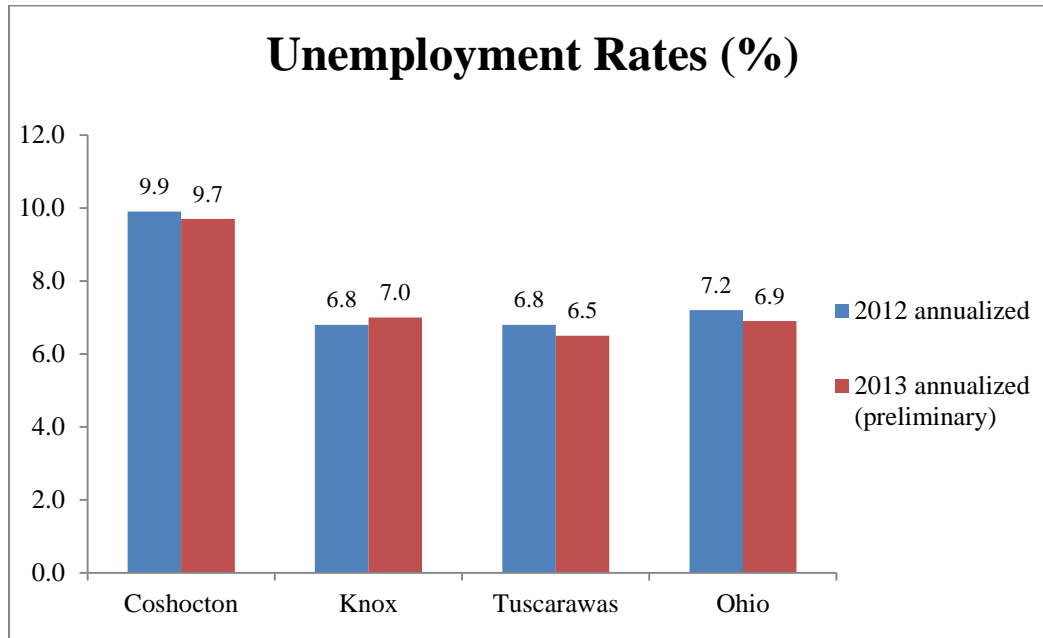
Based on this data from the Ohio Development Services Agency,<sup>4</sup> the poverty rate for Coshocton County has increased significantly and at a higher rate than the state and country.

**Labor, Employment, and Economics**

The following chart depicts the unemployment rate in 2012 and 2013 (preliminary as of July 2013) for the counties within the non-metropolitan assessment area. The unemployment rate for Coshocton County exceeds the unemployment rate of Ohio as a whole.

3 www.huduser.org

4 Ohio Development Services Agency, <http://www.development.ohio.gov/files/research/P7005.pdf>



The following table<sup>5</sup> depicts the largest employment sectors by the number of people employed in each county in the nonmetropolitan assessment area, as well as major employers in each county.

County	Primary Employment Sectors	Major Employers
Coshocton	Manufacturing, Trade, Transportation and Utilities, Education and Health Services, Local Government, Leisure and Hospitality, Professional and Business Services, Financial Services	AK Steel Holding Corp, American Electric Power Co, Coshocton City Schools, Coshocton County Government, Coshocton County Memorial Hospital, Kraft Foods Inc., McWane Corp/Clow Water Systems, Riverview Local Schools, RockTenn CP LLC
Knox	Manufacturing, Education and Health Services, Trade, Transportation and Utilities, Leisure and Hospitality, Professional and Business Services, Construction, Other services, Financial Services	Ariel Ltd, FT Precision, JELD-WEN Inc, Kenyon College, Knox Community Hospital, Kokosing Construction Co, Mount Vernon Nazarene University, Mt Vernon City Schools, Rolls-Royce plc, Sanoh America Inc, State of Ohio
Tuscarawas	Manufacturing, Trade, Transportation and Utilities, Education and Health Services, Local Government, Leisure and Hospitality, Professional and Business Services, Construction, Financial Services	Alamo Group/Gradall Industries, Allied Machine & Engineering, Dover City Schools, New Philadelphia City Schools, RockTenn CP LLC, Union Hospital, Wal-Mart Stores Inc, Zimmer Orthopedic

<sup>5</sup> [http://development.ohio.gov/reports/reports\\_countytrends\\_map.html](http://development.ohio.gov/reports/reports_countytrends_map.html) Ohio County Profiles, Ohio Office of Policy, Research and Strategic Planning

## **Housing**

There were 81,431 housing units in the assessment area as of the 2010 U.S. Census. Owner-occupied properties comprised 67.3% of the total units and rental units comprised 22.7% of the total units. The owner-occupancy rate for the assessment area was higher than the Ohio rate of 61.7%. Of the housing units, 77.0% were single family dwellings, 13.0% were multi-family dwellings, and 10.0% were mobile homes. Of the total housing units, 17.2% are located in moderate- income census tracts, 70.5% are located in middle- income census tracts, and 12.3% are located in upper- income census tracts.

The median age of housing in the assessment area was 45 years as of the 2010 U.S. Census. This was comparable to the median age of housing for Ohio overall. The median age of housing was 58 years in moderate- income census tracts, 46 years in middle- income census tracts, and 29 years in upper- income census tracts.

The median housing value in the assessment area was \$115,142 with an affordability ratio of 37.0%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. The housing stock in the assessment area is slightly more affordable than Ohio's (34.7%). Further, based on the 2012 median family income for non-metropolitan Ohio (\$53,600), approximately 32.7% of the homes valued up to \$87,366 in the assessment area would be considered affordable for low-income individuals and 61.7% of the homes valued up to \$139,786 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 5% fixed-rate, 30-year loan.

According to Sperling's Best Places,<sup>6</sup> the median cost of a home in Coshocton, Ohio is \$70,400. Home values have depreciated by 0.2% in the past year and compared to the rest of the nation, the cost of living is 15.3% lower than average. The median cost of a home in Mount Vernon, Ohio (Knox County) is \$101,300. Home values have depreciated by 0.1% in the past year and compared to the rest of the nation, the cost of living is 11.8% lower than average. The median cost of a home in New Philadelphia, Ohio (Tuscarawas County) is \$83,900. Home values have depreciated by 0.2% in the past year, and compared to the rest of the nation the cost of living is 11.3% lower than average.

The following table illustrates the demographics in the non-metropolitan assessment area.

---

<sup>6</sup> Sperling's Best Places, <http://bestplaces.net>



### Combined Demographics Report

Assessment Area(s): Non Metro Ohio AA 2012

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	9,220	18.4	
Moderate-income	8	18.6	7,601	15.1	1,336	17.6	9,725	19.4	
Middle-income	30	69.8	36,312	72.3	3,191	8.8	11,304	22.5	
Upper-income	5	11.6	6,295	12.5	393	6.2	19,959	39.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>43</b>	<b>100.0</b>	<b>50,208</b>	<b>100.0</b>	<b>4,920</b>	<b>9.8</b>	<b>50,208</b>	<b>100.0</b>	
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>							
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%	
Low-income	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate-income	14,016	7,592	13.8	54.2	4,833	34.5	1,591	11.4	
Middle-income	57,427	40,182	73.3	70.0	11,734	20.4	5,511	9.6	
Upper-income	9,988	7,045	12.9	70.5	1,906	19.1	1,037	10.4	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>81,431</b>	<b>54,819</b>	<b>100.0</b>	<b>67.3</b>	<b>18,473</b>	<b>22.7</b>	<b>8,139</b>	<b>10.0</b>	
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>							
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>			
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	1,597	16.3	1,421	16.0	104	18.7	72	18.0	
Middle-income	6,947	70.8	6,269	70.8	406	73.0	272	68.0	
Upper-income	1,267	12.9	1,165	13.2	46	8.3	56	14.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>9,811</b>	<b>100.0</b>	<b>8,855</b>	<b>100.0</b>	<b>556</b>	<b>100.0</b>	<b>400</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>90.3</b>		<b>5.7</b>		<b>4.1</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>							
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>			
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	52	5.8	52	5.8	0	0.0	0	0.0	
Middle-income	756	84.4	753	84.3	3	100.0	0	0.0	
Upper-income	88	9.8	88	9.9	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>896</b>	<b>100.0</b>	<b>893</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	
<b>Percentage of Total Farms:</b>				<b>99.7</b>		<b>.3</b>		<b>.0</b>	

Based on 2012 D&B information according to 2010 ACSBoundaries.

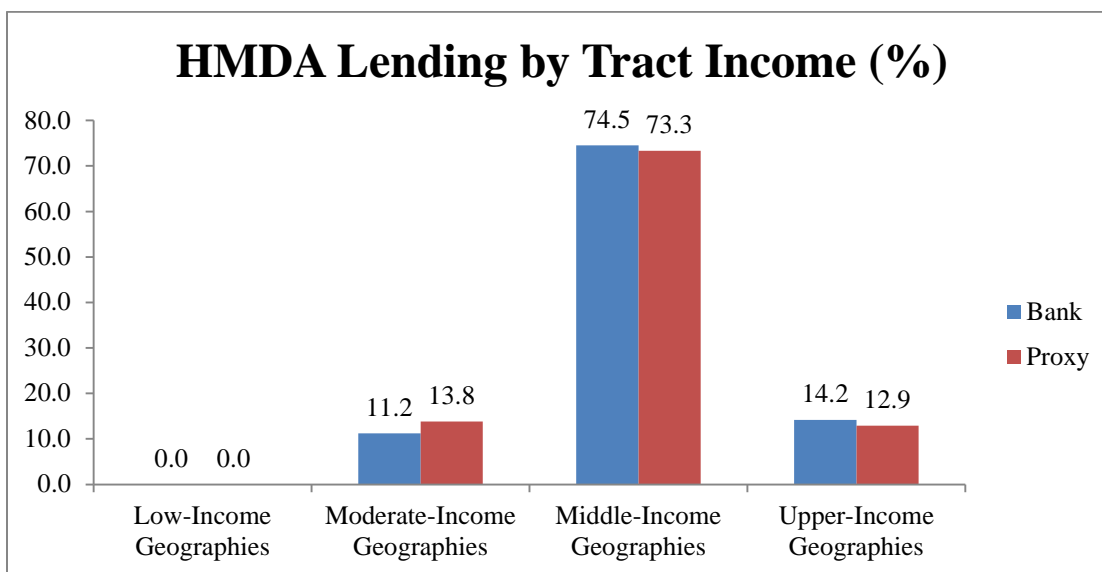
## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN OHIO ASSESSMENT AREA

### Lending Test

The lending performance in the non-metropolitan Ohio assessment area is reasonable. Both the geographic and borrower distribution of lending is reasonable.

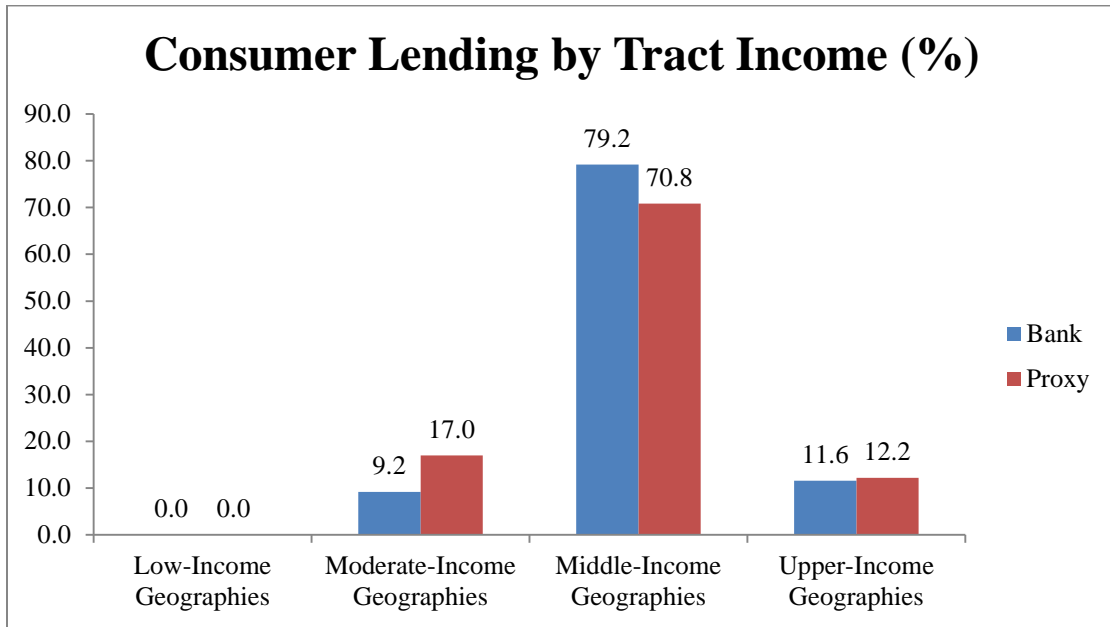
### *Geographic Distribution of Lending*

The overall geographic distribution of lending in the non-metropolitan assessment area is reasonable.

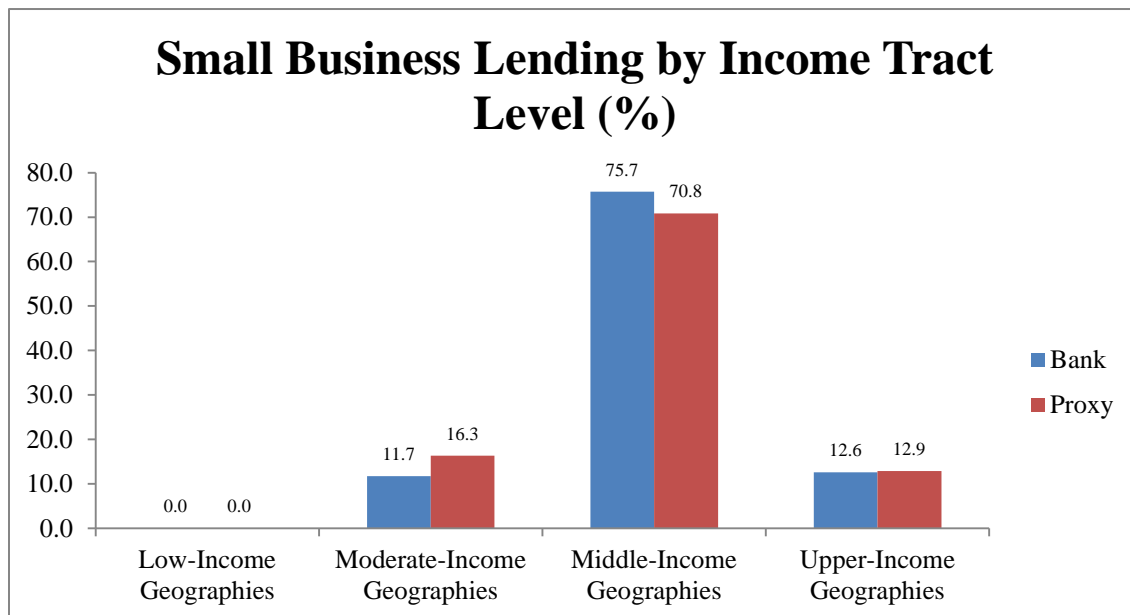


The geographic distribution of HMDA reportable loans was considered reasonable. The bank made 11.2% of its HMDA loans in moderate-income tracts, which was only slightly lower than the proxy at 13.8%. Slightly more HMDA loans were made in the middle-income tracts by the bank at 74.5% than the proxy at 73.3%. Slightly more HMDA loans were made in the upper-income tracts by the bank at 14.2% than the proxy at 12.9%.

A number of factors limit the ability of lenders to originate residential mortgage loans in moderate-income tracts. Depressed real estate values since 2008 make purchasing a home less attractive in terms of personal investment. Additionally, stagnant values make it more difficult for existing homeowners with limited equity to refinance their existing mortgage loan. The increased age of the housing stock means that prospective home buyers would need to budget for home improvement and upkeep costs, in addition to mortgage repayment costs. Lastly, 27.2% of the families in moderate-income tracts have incomes below the poverty level and would likely not be able to qualify for any type of mortgage loan.



The geographic distribution of consumer loans was considered reasonable. The bank made 9.2% of its consumer loans in moderate-income tracts, which was lower than the percentage of households (proxy) at 17.0%. More consumer loans were made by the bank in the middle-income tracts at 79.2% than the proxy at 70.8%. Slightly fewer consumer loans were made by the bank in the upper-income tracts at 11.6% than the proxy at 12.2%.



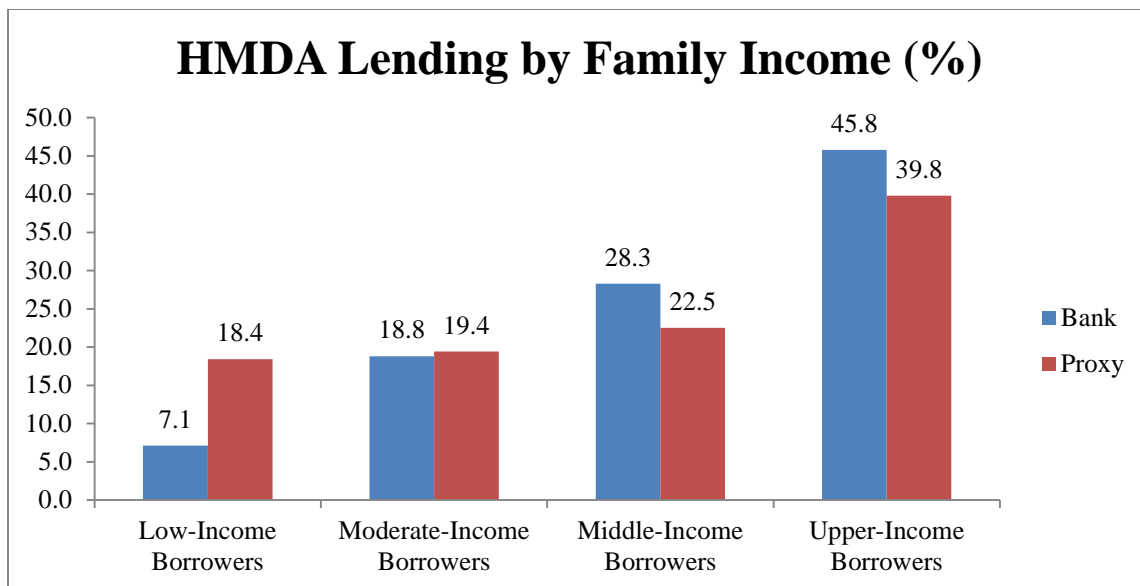
The geographic distribution of small business loans was considered reasonable. The bank made 11.7% of its small business loans in moderate-income tracts, which was less than the percentage of businesses in moderate-income tracts (proxy) at 16.3%. Slightly more small business loans were made by the bank in the middle-income tracts at 75.7% than the proxy at 70.8%.

Slightly more small business loans were made by the bank in the upper- income tracts at 12.6% than the proxy at 12.9%. A community contact in Coshocton County indicated that Ohio Heritage is active and effective in meeting the credit needs of small businesses in the county.

Based upon the analysis of the bank’s lending, no significant gaps were noted. During the evaluation period, the bank originated loans in the majority of census tracts in the assessment area. Ohio Heritage originated loans in all of the census tracts in Coshocton County, where the main office is located. The bank originated loans in six of the eight moderate- income census tracts in the assessment area. The two moderate- income census tracts where there were no originations are located in eastern Tuscarawas County and are not proximate to Ohio Heritage branch locations.

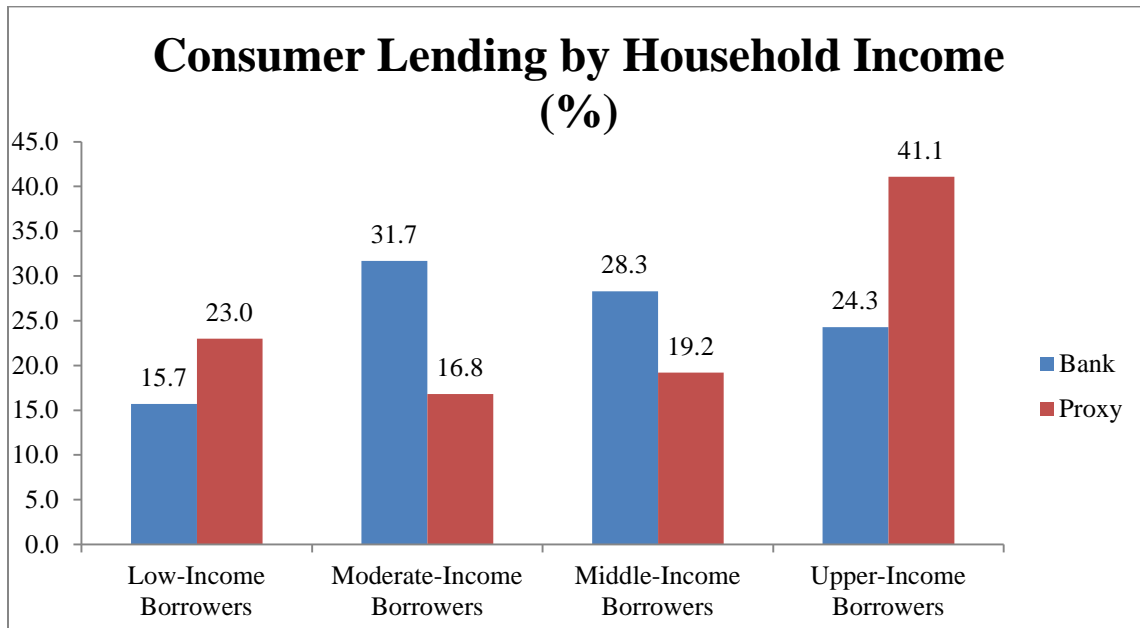
### **Borrower Distribution of Lending**

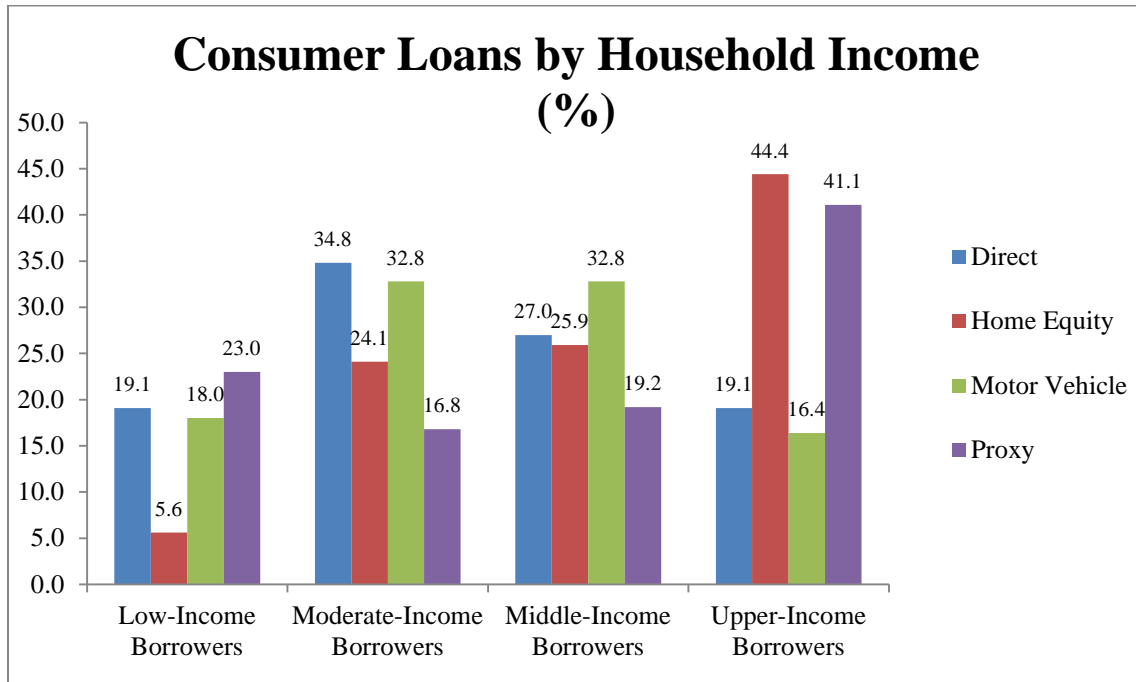
The overall borrower distribution of lending in the non-metropolitan assessment area is reasonable.



The borrower distribution of HMDA loans was considered reasonable. The bank made 7.1% of its HMDA loans to low-income borrowers compared to the percentage of low-income families in the assessment area (proxy) at 18.4%. Also, the bank made 18.8% of its HMDA loans to moderate-income borrowers, which compares closely to the percentage of moderate-income families in the assessment area at 19.4%. Middle-income borrowers received 28.3% of the HMDA loans compared to the proxy of 22.5%. Upper-income borrowers received 45.8% of the HMDA loans compared to the proxy of 39.8%.

A number of factors limit the ability of creditors to originate HMDA loans to low-income borrowers. A limited percentage of homes would be marginally affordable for low-income (32.0%) families. The increased age of the housing stock means that prospective home buyers would need to budget for home improvement and upkeep costs, in addition to mortgage repayment costs. An unemployment rate in Coshocton County (9.7%) above the state average (6.9%) makes it increasingly difficult for low-income borrowers to qualify for HMDA loans. Lastly, 9.8% of families in the assessment area have incomes below the poverty level, many of whom are likely to be low-income. Families below the poverty level would not likely be able to qualify for any type of residential mortgage loan.



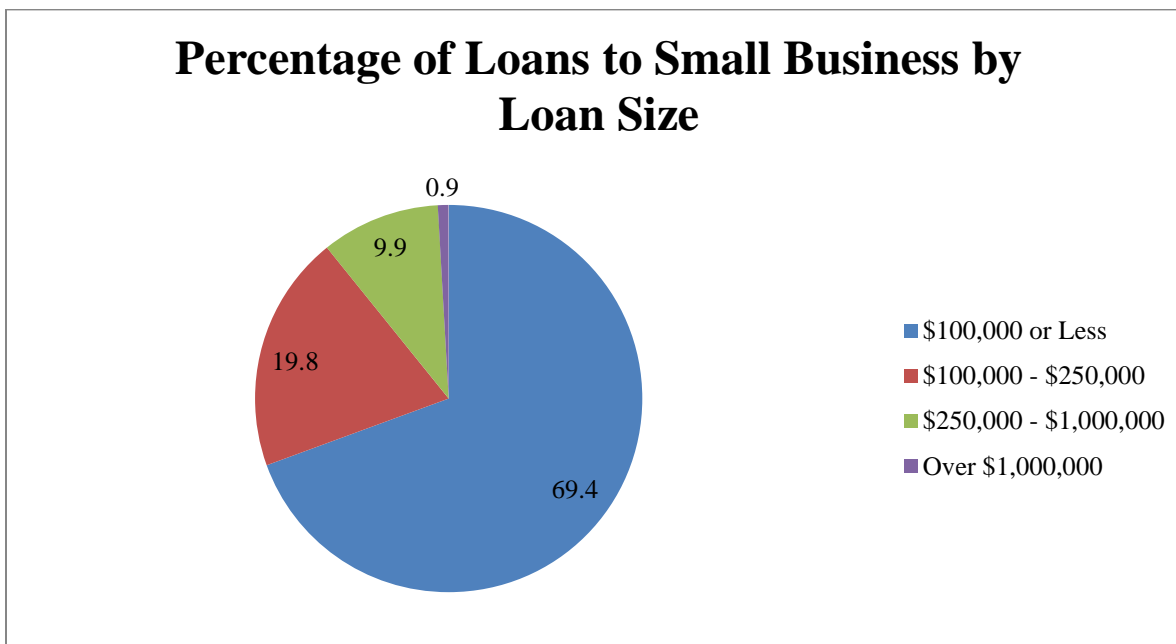
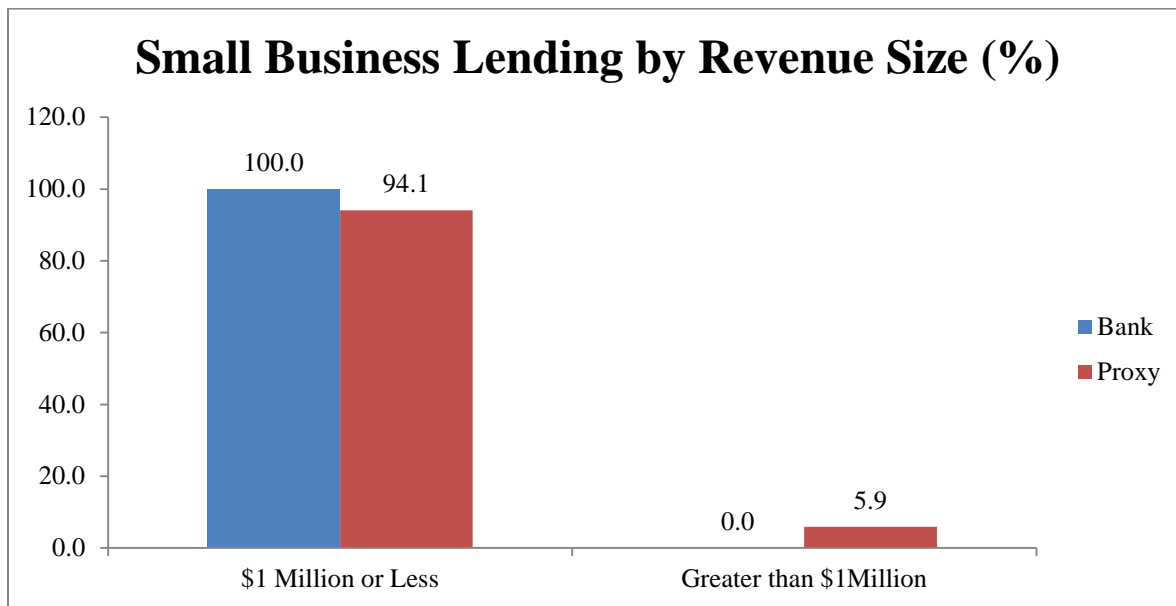


The borrower distribution of direct consumer loans was considered excellent. The bank made 19.1% of its direct consumer loans to low-income borrowers, which compares to the percentage of low-income households in the assessment area at 23.0%. Moderate-income borrowers received 34.8% of the direct consumer loans, which is greater than the percentage of moderate-income households of 16.8%. Middle-income borrowers received 27.0% of the direct consumer loans compared to the proxy of 19.2%. Upper-income borrowers received 19.1% of direct consumer loans compared to the proxy figure of 41.1%.

The borrower distribution of home equity loans was considered reasonable. The bank made 5.6% of its home equity loans to low-income borrowers, which is less than the percentage of low-income households in the assessment area at 23.0%. However, moderate-income borrowers received 24.1% of the home equity loans, which is greater than the percentage of moderate-income households of 16.8%. Middle-income borrowers received 25.9% of the home equity loans compared to the proxy of 19.2%. Upper-income borrowers received 44.4% of home equity loans compared to the proxy figure of 41.1%.

The borrower distribution of motor vehicle loans was considered excellent. The bank made 18.0% of its motor vehicle loans to low-income borrowers, which is less than the percentage of low-income households in the assessment area at 23.0%. Moderate-income borrowers received 32.8% of the motor vehicle loans, which greatly exceeds the percentage of moderate-income households of 16.8%. Middle-income borrowers received 32.8% of the motor vehicle loans compared to the proxy of 19.2%. Upper-income borrowers received 16.4% of motor vehicle loans compared to the proxy figure of 41.1%.

Low-income households generally spend a relatively high proportion of their incomes on basic necessities such as food, clothing, and shelter. As a result, demand for traditional consumer loans is limited among low-income families. Additionally, 9.8% of families in the assessment area have incomes below the poverty level, many of whom are likely to be low-income. Families below the poverty level have limited capacity to qualify for consumer loans. Nonetheless, Ohio Heritage’s distribution of direct consumer loans and motor vehicle loans to low- and moderate-income borrowers was closely comparable to or above the proxy. As a result, the borrower distribution of consumer loans was considered to be excellent.



The borrower distribution for small business loans is considered reasonable. Small business lending was comparable to the percentage of small businesses in the assessment area.

An analysis of small business lending was conducted to determine the extent of lending to businesses of different revenue sizes, including small businesses. Ohio Heritage originated 100.0% of its loans to businesses with revenues of \$1 million or less. This exceeds the percentage of small businesses in the assessment area at 94.1%. The loan size was also considered, as smaller loans are generally commensurate with the borrowing needs of smaller businesses. This review showed that 69.4% of small business loans were for loan amounts of \$100,000 or less.



**DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN  
COLUMBUS, OHIO METROPOLITAN STATISTICAL AREA 18140**  
(Full-scope Review)

Ohio Heritage’s metropolitan assessment area consists of Licking County, which is part of the Columbus MSA in central Ohio. Newark is the largest city and is the county seat. Licking County is adjacent to Knox County to the north and Coshocton County to the northeast. Of the 32 census tracts in the assessment area, one is a low-income tract, nine are moderate-income, 17 are middle-income, and five are upper-income census tracts.

Ohio Heritage serves this assessment area through two branch offices with full-service ATMs. The Newark branch office and ATM are located in a moderate-income census tract and the Heath branch office and ATM are located in a middle-income census tract.

As of June 30, 2013, the FDIC reported 12 insured financial institutions operating 51 branches within the assessment area. The FDIC’s market share report indicates that Ohio Heritage ranked ninth among these institutions, holding 1.18% of the market share of deposits. The Park National Bank, headquartered in Newark, Ohio, dominates the Licking County deposit market share. The following table illustrates the deposit market share for the top ten institutions in the assessment area by deposit market share.

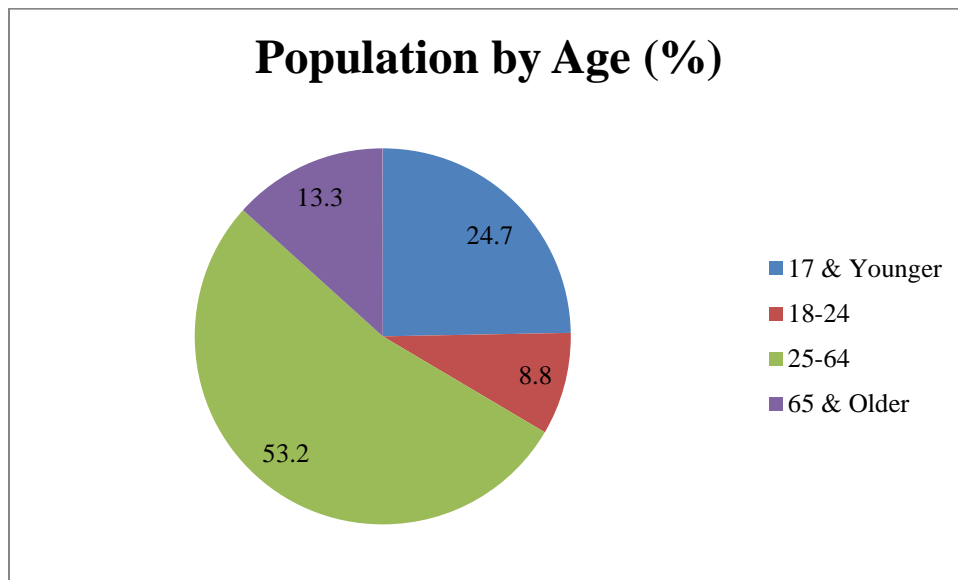
#	Financial Institution	Deposit Market Share
1	The Park National Bank	58.27%
2	JPMorgan Chase Bank, National Association	10.07%
3	The Huntington National Bank	9.34%
4	PNC Bank, National Association	6.78%
5	First Federal Savings and Loan Association	6.02%
6	Heartland Bank	4.62%
7	The Pataskala Banking Company	1.41%
8	Fifth Third Bank	1.31%
9	Ohio Heritage Bank	1.18%
10	The Vinton County National Bank	0.76%

**Population**

The 2010 U.S. Census Bureau data indicates that the population in the bank’s assessment area is 166,492. The following table depicts the 2010 and estimated 2012 populations of Licking County as well as the estimated population change:<sup>7</sup>

County	2010 Population	2012 Population	Population Percent Change
Licking	166,492	167,537	0.6%

Approximately 24.7% of the population is under 18, while 75.3% of the population is 18 years or older, which is the legal age to enter into a contract. The following chart illustrates the population, by age, within the assessment area.



Of the population in the county, 2.0% of the population lives in low-income, 22.2% in moderate-income, 57.6% in middle-income, and 18.2% in upper-income tracts.

**Income Characteristics**

The following table depicts the MFI for the Columbus MSA, which includes Licking County.<sup>8</sup>

County	2012 MFI	2013 MFI
Columbus MSA	\$67,500	\$67,900

<sup>7</sup> American Fact Finder, <http://factfinder2.census.gov>

<sup>8</sup> [www.huduser.org](http://www.huduser.org)

In 2010, the Columbus MSA assessment area contained 62,569 households, of which 44,683 (71.4%) are designated as families. Low- and moderate- income families represent 21.1% and 19.2% of all families in the assessment area respectively. In addition, 8.2% of families in the assessment area live below the poverty level compared to 10.3 % for Ohio.

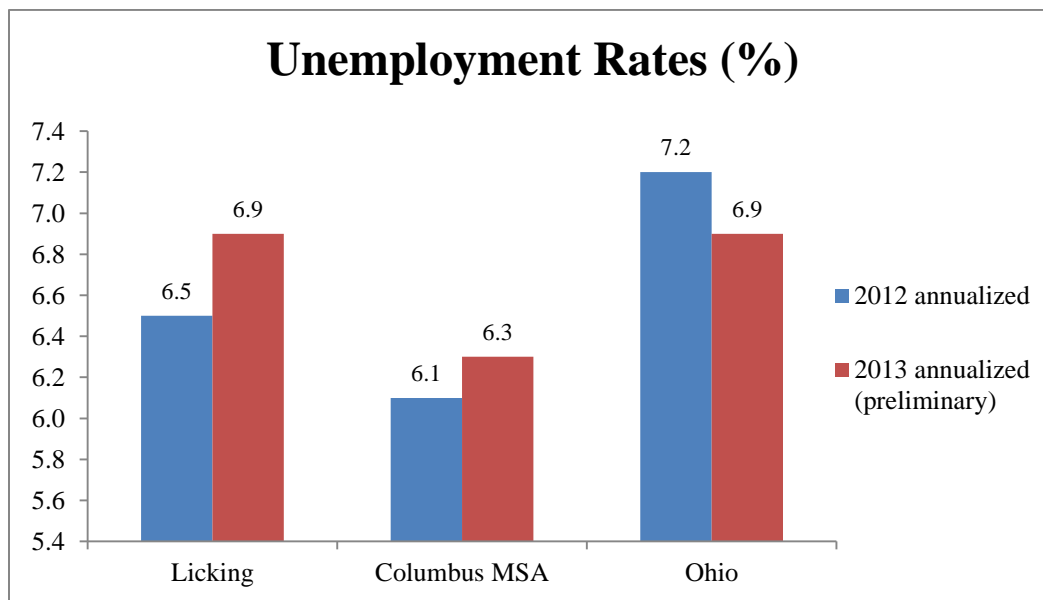
The following table shows poverty rates for Columbus, Ohio MSA (Licking County only) for 1999 and 2011:

County	1999 Poverty Rate	2011 Poverty Rate	Change
Licking	7.50%	11.60%	54.67%
Ohio	10.60%	16.40%	54.72%
United States	12.40%	15.90%	28.23%

Based on this data from the Ohio Development Services Agency,<sup>9</sup> poverty rates for Licking County have increased significantly and at a similar rate to the state, but higher for the country.

**Labor, Employment, and Economics**

The following chart depicts the unemployment rate in 2012 and 2013 (preliminary as of July 2013) for Licking County and the Columbus MSA as a whole. The unemployment rate for Licking County was less than that of Ohio in 2012, but is equal to the preliminary unemployment rate for the state in 2013.



9 Ohio Development Services Agency, <http://www.development.ohio.gov/files/research/P7005.pdf>

The following table depicts the largest employment sectors by the number of people employed in Licking County, as well as major employers in the county.<sup>10</sup>

County	Primary Employment Sectors	Major Employers
Licking	Manufacturing, Trade, Transportation and Utilities, Education and Health Services, Local Government, Leisure and Hospitality, Professional and Business Services, Financial Services	Anomatic Corp, ArvinMeritor Inc, Boeing Co, Denison University, Licking County Government, Licking Memorial Health Systems, Newark City Schools, Owens-Corning, Park National Bank, State Farm Mutual Automobile Ins Co

**Housing**

There were 68,398 housing units in the assessment area as of the 2010 U.S. Census. Owner-occupied properties comprised 68.0% of the total units and rental units comprised 23.5% of the total units. The owner-occupancy rate for the assessment area was higher than Ohio’s rate of 61.7%. Of the housing units, 78.7% were single family dwellings, 17.0% were multi-family dwellings, and 4.3% were mobile homes. Of the total housing units, 2.5% are located in low-income census tracts, 24.6% are located in moderate-income census tracts, 57.0% are located in middle-income census tracts, and 15.9% are located in upper-income census tracts.

The median age of housing in the assessment area was 36 years as of the 2010 U.S. Census. This was less than the median age of housing for Ohio overall at 44 years. The median age of housing was 61 years in low-income census tracts, 54 years in moderate-income census tracts, 33 years in middle-income census tracts, and 20 years in upper-income census tracts.

The median housing value in the assessment area was \$152,624 with an affordability ratio of 34.7%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. The housing stock in the assessment area is as affordable as in Ohio (34.7%). Further, based on the 2012 median family income for the Columbus MSA (\$67,500), approximately 26.9% of the homes valued up to \$110,023 in the assessment area would be considered affordable for low-income individuals and 61.9% of the homes valued up to \$176,036 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 5% fixed-rate, 30-year loan.

According to Sperling’s Best Places,<sup>11</sup> the median cost of a home in Newark, Ohio (Licking County) is \$85,500, home values have depreciated by 0.3% in the past year and compared to the rest of the nation, the cost of living is 13.2% lower than average.

The following table illustrates the demographics in the non-metropolitan assessment area.

<sup>10</sup> Ohio Department of Development  
<sup>11</sup> Sperlings Best Places, <http://bestplaces.net>

### Combined Demographics Report

Assessment Area(s): Columbus Ohio MSA AA 2012

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.1	791	1.8	232	29.3	9,429	21.1
Moderate-income	9	28.1	9,928	22.2	1,370	13.8	8,596	19.2
Middle-income	17	53.1	26,052	58.3	1,842	7.1	10,007	22.4
Upper-income	5	15.6	7,912	17.7	228	2.9	16,651	37.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>32</b>	<b>100.0</b>	<b>44,683</b>	<b>100.0</b>	<b>3,672</b>	<b>8.2</b>	<b>44,683</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	1,744	692	1.5	39.7	862	49.4	190	10.9
Moderate-income	16,821	9,681	20.8	57.6	5,137	30.5	2,003	11.9
Middle-income	38,965	27,284	58.6	70.0	8,539	21.9	3,142	8.1
Upper-income	10,868	8,872	19.1	81.6	1,502	13.8	494	4.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>68,398</b>	<b>46,529</b>	<b>100.0</b>	<b>68.0</b>	<b>16,040</b>	<b>23.5</b>	<b>5,829</b>	<b>8.5</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	467	5.3	410	5.0	40	9.8	17	5.3
Moderate-income	1,616	18.2	1,479	18.2	66	16.1	71	22.0
Middle-income	5,048	56.9	4,620	56.8	242	59.2	186	57.6
Upper-income	1,735	19.6	1,625	20.0	61	14.9	49	15.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>8,866</b>	<b>100.0</b>	<b>8,134</b>	<b>100.0</b>	<b>409</b>	<b>100.0</b>	<b>323</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.7</b>		<b>4.6</b>		<b>3.6</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	3	0.6	3	0.6	0	0.0	0	0.0
Moderate-income	120	24.9	119	24.8	1	33.3	0	0.0
Middle-income	329	68.3	327	68.3	2	66.7	0	0.0
Upper-income	30	6.2	30	6.3	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>482</b>	<b>100.0</b>	<b>479</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>99.4</b>		<b>.6</b>		<b>.0</b>

Based on 2012 D&B information according to 2010 ACSBoundaries.

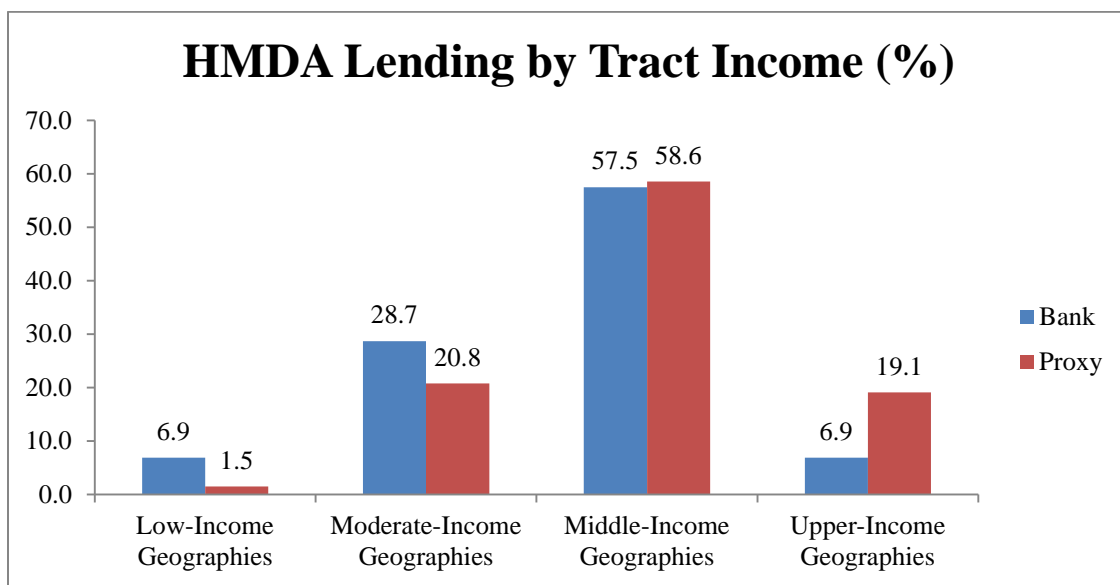
## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBUS METROPOLITAN STATISTICAL AREA 18140

### Lending Test

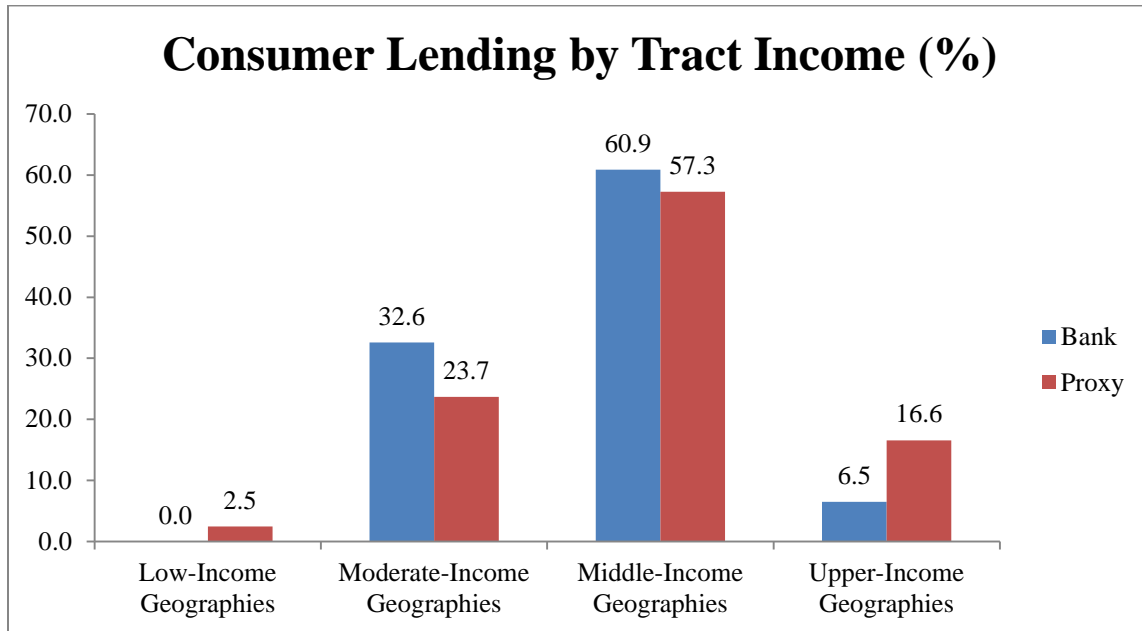
The lending performance in the Columbus MSA is reasonable. Both the geographic and borrower distribution of lending is reasonable.

### Geographic Distribution of Lending

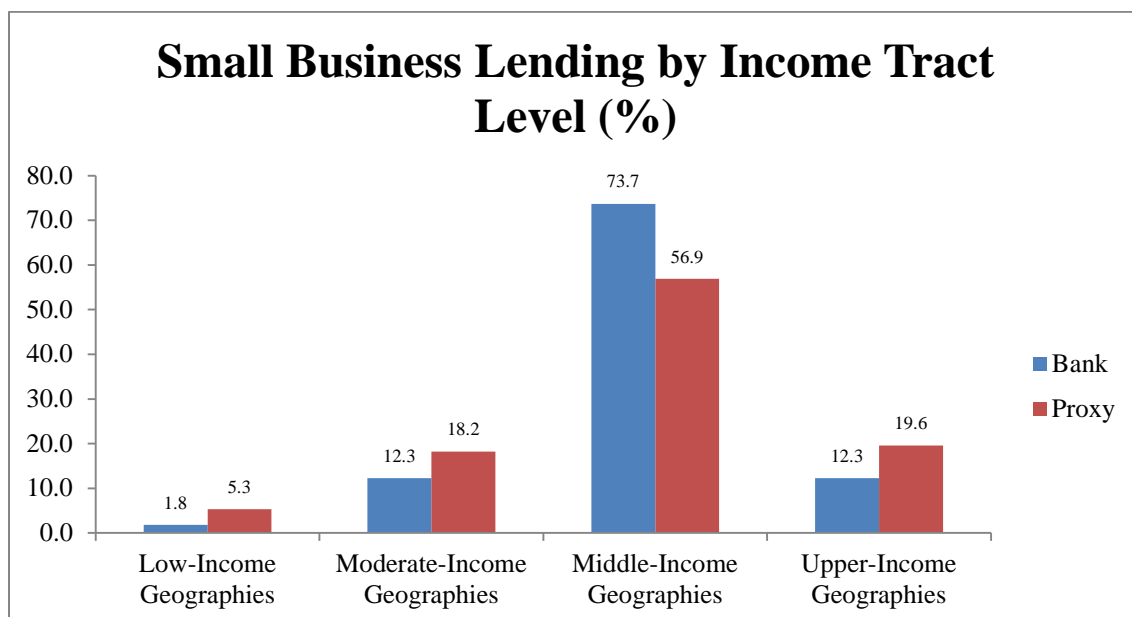
The overall geographic distribution of lending in the metropolitan assessment area is excellent.



The geographic distribution of HMDA reportable loans was considered excellent. The bank made 6.9% of its HMDA loans in low-income tracts, which exceeded the proxy at 1.5%. Also, the bank made 28.7% of its HMDA loans in moderate-income tracts, exceeding the proxy at 20.8%. HMDA loans made in the middle-income tracts at 57.5% compared very closely to the proxy at 58.6%. Fewer loans were made in the upper-income tracts by the bank at 6.9% than the proxy at 19.1%.



The geographic distribution of consumer loans was considered excellent. Although the bank made no loans in low-income census tracts, Ohio Heritage made 32.6% of its consumer loans in moderate-income tracts, which was higher than the percentage of households (proxy) at 23.7%. Slightly more consumer loans were made by the bank in the middle-income tracts at 60.9% than the proxy at 57.3%. Fewer consumer loans were made by the bank in the upper-income tracts at 6.5% than the proxy at 16.6%.



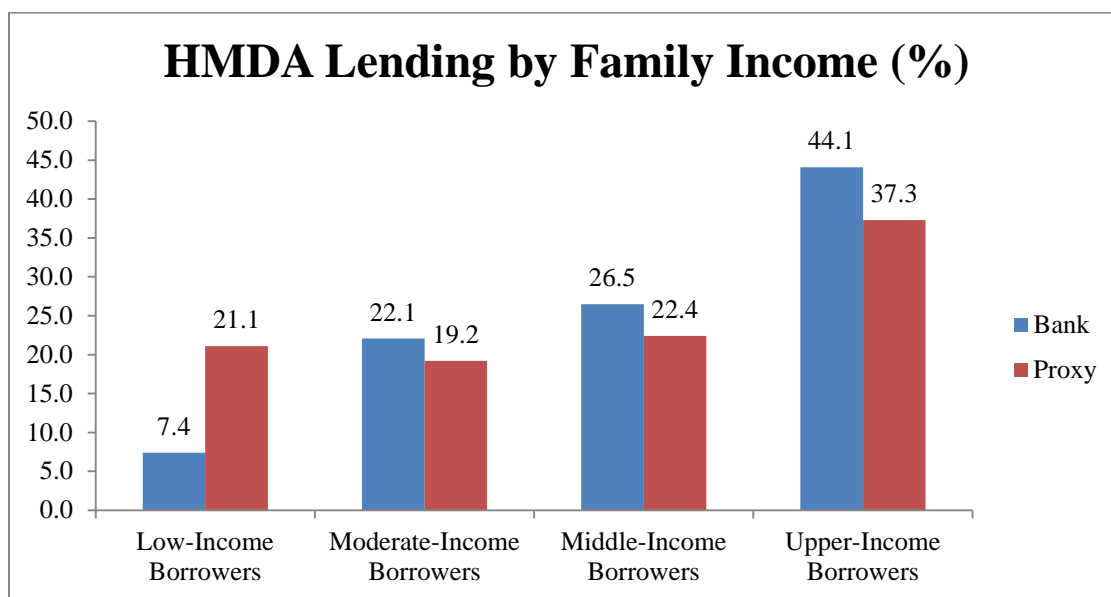
The geographic distribution of small business loans was considered reasonable. The bank made 1.8% of its small business loans in low-income tracts, which was less than the percentage of businesses in low income tracts (proxy) at 5.3%.

The bank made 12.3% of its small business loans in moderate income tracts compared to the proxy at 18.2%. More small business loans were made by the bank in the middle-income tracts at 73.7% than the proxy at 56.9%. Fewer small business loans were made by the bank in the upper-income tracts at 12.3% than the proxy at 19.6%.

Based upon the analysis of the bank's lending, no significant gaps were noted. During the evaluation period, the bank originated loans in the majority of census tracts in the assessment area. Ohio Heritage originated loans in the one low-income census tract and in eight of the nine moderate-income census tracts in the assessment area.

### **Borrower Distribution of Lending**

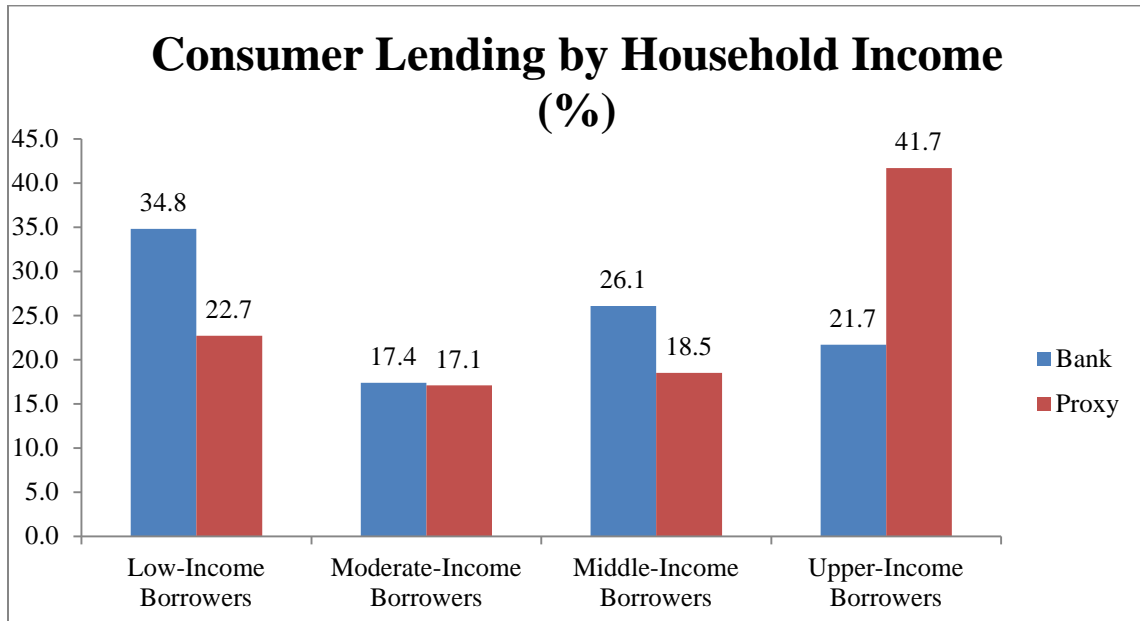
The overall borrower distribution of lending in the metropolitan assessment area is reasonable.



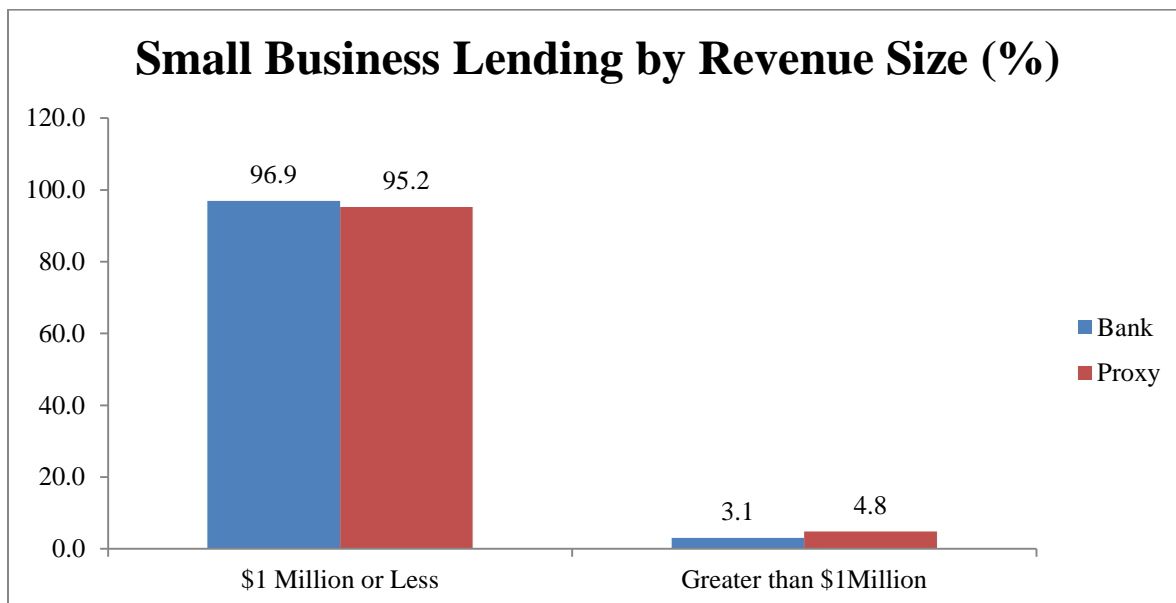
The borrower distribution of HMDA loans was considered reasonable. The bank made 7.4% of its HMDA loans to low-income borrowers compared to the percentage of low-income families in the assessment area (proxy) at 21.1%. Also, the bank made 22.1% of its HMDA loans to moderate-income borrowers, which compares closely to the percentage of moderate-income families in the assessment area at 19.2%. Middle-income borrowers received 26.5% of the HMDA loans compared to the proxy of 22.4%. Upper-income borrowers received 44.1% of the HMDA loans compared to the proxy of 37.3%.

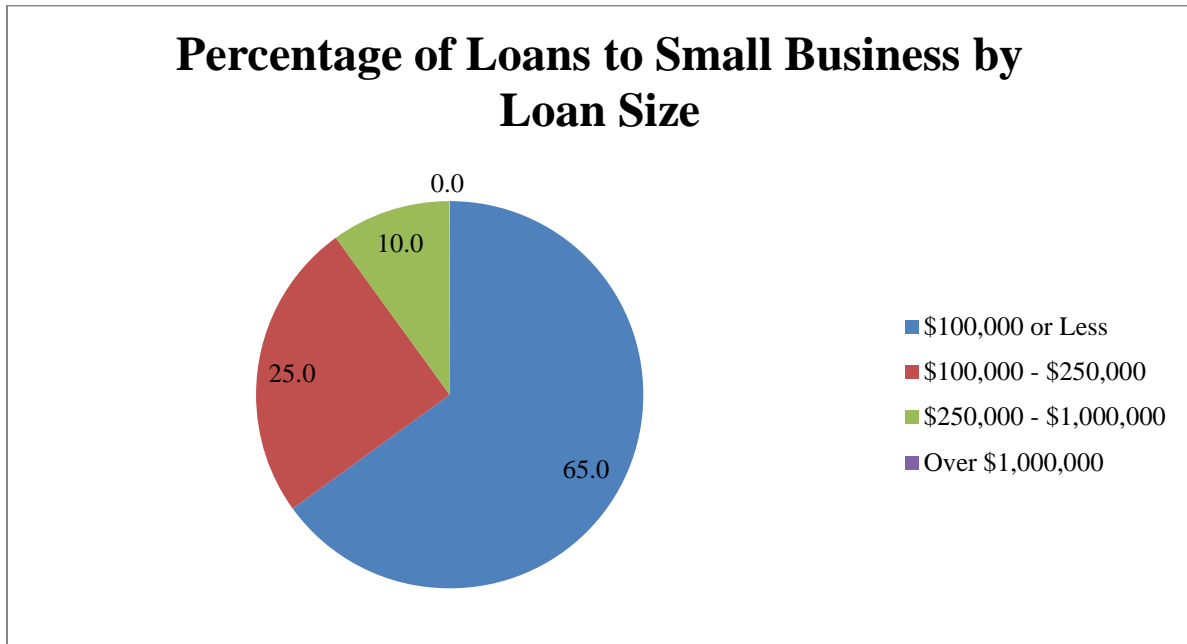
A number of factors limit the ability of creditors to originate HMDA loans to low-income borrowers. A limited percentage of homes would be marginally affordable for low-income (27.2%) families. The increased age of the housing stock means that prospective home buyers would need to budget for home improvement and upkeep costs, in addition to mortgage repayment costs. Lastly, 8.2% of families in the assessment area have incomes below the poverty level, many of whom are likely to be low-income. Families below the poverty level would not likely be able to qualify for any type of residential mortgage loan.





The borrower distribution of consumer loans was considered excellent. The bank made 34.8% of its consumer loans to low-income borrowers, which exceeds the percentage of low-income households in the assessment area at 22.7%. Moderate-income borrowers received 17.4% of the consumer loans, which is greater than the percentage of moderate-income households of 17.1%. Middle-income borrowers received 26.1% of the consumer loans compared to the proxy of 18.5%. Upper-income borrowers received 21.7% of consumer loans compared to the proxy figure of 41.7%.





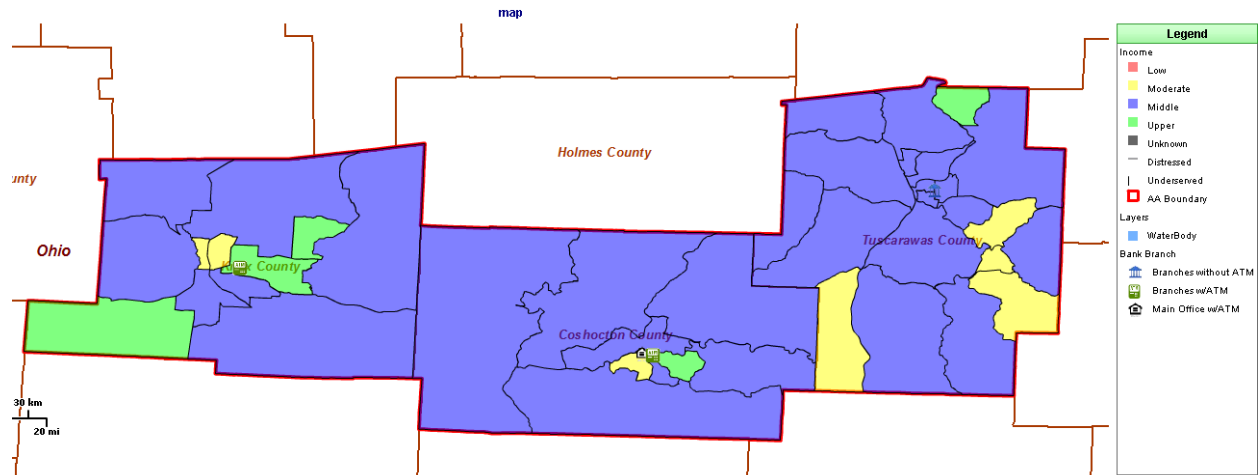
The borrower distribution for small business loans is considered reasonable. Small business lending was comparable to the percentage of small businesses in the assessment area.

An analysis of small business lending was conducted to determine the extent of lending to businesses of different revenue sizes, including small businesses. Ohio Heritage originated 96.9% of its loans to businesses with revenues of \$1 million or less. This exceeds the percentage of small businesses in the assessment area at 95.2%. The loan size was also considered, as smaller loans are generally commensurate with the borrowing needs of smaller business. This review showed that 65.4% of small business loans were for loan amounts of \$100,000 or less.

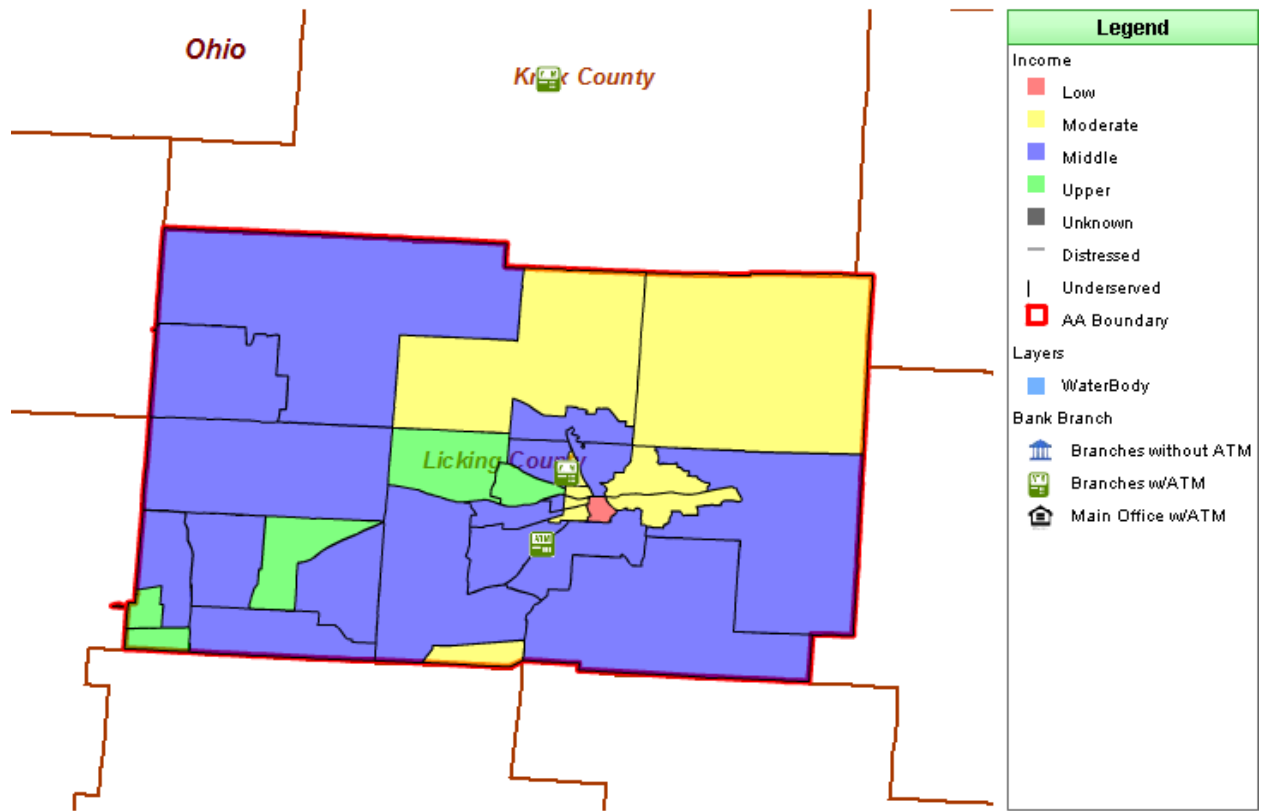
# APPENDIX A

## ASSESSMENT AREA MAP

### Assessment Area: Non-Metro Ohio AA Map



Assessment Area: Columbus Ohio MSA



**APPENDIX B**  
**LENDING TABLES**

**HMDA Loan Distribution Table**

Exam: Ohio Heritage Coshocton

Assessment Area/Group :Non Metro Ohio, Combined Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	11	6.7%	650	3.8%
Moderate	19	11.6%	1,837	10.7%	24	14.6%	1,397	8.1%
Low/Moderate Total	19	11.6%	1,837	10.7%	35	21.3%	2,047	11.9%
Middle	126	76.8%	13,595	79.0%	39	23.8%	3,089	17.9%
Upper	19	11.6%	1,786	10.4%	73	44.5%	9,428	54.8%
Unknown	0	0.0%	0	0.0%	17	10.4%	2,654	15.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	164	100.0%	17,218	100.0%	164	100.0%	17,218	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	4	5.8%	100	1.3%
Moderate	8	11.6%	795	10.2%	14	20.3%	1,161	14.9%
Low/Moderate Total	8	11.6%	795	10.2%	18	26.1%	1,261	16.2%
Middle	50	72.5%	5,567	71.7%	20	29.0%	1,756	22.6%
Upper	11	15.9%	1,404	18.1%	23	33.3%	3,207	41.3%
Unknown	0	0.0%	0	0.0%	8	11.6%	1,542	19.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	69	100.0%	7,766	100.0%	69	100.0%	7,766	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	2	5.9%	122	6.0%
Moderate	3	8.8%	83	4.1%	7	20.6%	129	6.3%
Low/Moderate Total	3	8.8%	83	4.1%	9	26.5%	251	12.2%
Middle	23	67.6%	1,433	69.9%	9	26.5%	538	26.3%
Upper	8	23.5%	533	26.0%	14	41.2%	990	48.3%
Unknown	0	0.0%	0	0.0%	2	5.9%	270	13.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	34	100.0%	2,049	100.0%	34	100.0%	2,049	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	17	6.4%	872	3.2%
Moderate	30	11.2%	2,715	10.0%	45	16.9%	2,687	9.9%
Low/Moderate Total	30	11.2%	2,715	10.0%	62	23.2%	3,559	13.2%
Middle	199	74.5%	20,595	76.2%	68	25.5%	5,383	19.9%
Upper	38	14.2%	3,723	13.8%	110	41.2%	13,625	50.4%
Unknown	0	0.0%	0	0.0%	27	10.1%	4,466	16.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	267	100.0%	27,033	100.0%	267	100.0%	27,033	100.0%

\*Information based on 2010 ACS data

**HMDA Loan Distribution Table**

Exam: Ohio Heritage Coshocton

Assessment Area/Group :Columbus Ohio MSA, Combined Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	4	7.1%	179	3.3%	5	8.9%	273	5.0%
Moderate	14	25.0%	1,014	18.5%	12	21.4%	1,106	20.2%
Low/Moderate Total	18	32.1%	1,193	21.8%	17	30.4%	1,379	25.2%
Middle	33	58.9%	3,674	67.1%	11	19.6%	1,237	22.6%
Upper	5	8.9%	608	11.1%	21	37.5%	2,200	40.2%
Unknown	0	0.0%	0	0.0%	7	12.5%	659	12.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	56	100.0%	5,475	100.0%	56	100.0%	5,475	100.0%
<b>Refinance</b>								
Low	1	4.2%	150	3.1%	0	0.0%	0	0.0%
Moderate	7	29.2%	1,722	35.8%	3	12.5%	292	6.1%
Low/Moderate Total	8	33.3%	1,872	38.9%	3	12.5%	292	6.1%
Middle	15	62.5%	2,686	55.9%	7	29.2%	591	12.3%
Upper	1	4.2%	249	5.2%	9	37.5%	2,268	47.2%
Unknown	0	0.0%	0	0.0%	5	20.8%	1,656	34.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	4,807	100.0%	24	100.0%	4,807	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	17	100.0%	0	0.0%	0	0.0%
Low/Moderate Total	1	100.0%	17	100.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	17	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	17	100.0%	1	100.0%	17	100.0%
<b>Multi-Family</b>								
Low	1	16.7%	98	6.6%	0	0.0%	0	0.0%
Moderate	3	50.0%	861	57.8%	0	0.0%	0	0.0%
Low/Moderate Total	4	66.7%	959	64.4%	0	0.0%	0	0.0%
Middle	2	33.3%	531	35.6%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	6	100.0%	1,490	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	1,490	100.0%	6	100.0%	1,490	100.0%
<b>HMDA Totals</b>								
Low	6	6.9%	427	3.6%	5	5.7%	273	2.3%
Moderate	25	28.7%	3,614	30.7%	15	17.2%	1,398	11.9%
Low/Moderate Total	31	35.6%	4,041	34.3%	20	23.0%	1,671	14.2%
Middle	50	57.5%	6,891	58.5%	18	20.7%	1,828	15.5%
Upper	6	6.9%	857	7.3%	30	34.5%	4,468	37.9%
Unknown	0	0.0%	0	0.0%	19	21.8%	3,822	32.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	87	100.0%	11,789	100.0%	87	100.0%	11,789	100.0%

\*Information based on 2010 ACS data

**Consumer Loan Distribution Table**

Exam: Ohio Heritage Coshocton

Assessment Area/Group :Non Metro Ohio, Combined Years

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Direct Consumer</b>							
Low	0	0.0%	0	0.0%	22	7.4%	203	6.2%
Moderate	28	9.4%	258	7.9%	40	13.5%	370	11.3%
Low/Moderate Total	28	9.4%	258	7.9%	62	20.9%	573	17.4%
Middle	236	79.5%	2,566	78.1%	31	10.4%	319	9.7%
Upper	33	11.1%	463	14.1%	22	7.4%	327	9.9%
Unknown	0	0.0%	0	0.0%	182	61.3%	2,069	62.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	297	100.0%	3,287	100.0%	297	100.0%	3,287	100.0%
	<b>Home Equity</b>							
Low	0	0.0%	0	0.0%	3	5.4%	95	3.3%
Moderate	4	7.1%	260	9.1%	13	23.2%	461	16.2%
Low/Moderate Total	4	7.1%	260	9.1%	16	28.6%	556	19.5%
Middle	40	71.4%	2,006	70.4%	14	25.0%	526	18.5%
Upper	12	21.4%	582	20.4%	24	42.9%	1,551	54.5%
Unknown	0	0.0%	0	0.0%	2	3.6%	215	7.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	56	100.0%	2,848	100.0%	56	100.0%	2,848	100.0%
	<b>Motor Vehicle</b>							
Low	0	0.0%	0	0.0%	11	18.0%	99	11.8%
Moderate	6	9.8%	65	7.8%	20	32.8%	286	34.3%
Low/Moderate Total	6	9.8%	65	7.8%	31	50.8%	385	46.1%
Middle	52	85.2%	714	85.4%	20	32.8%	239	28.6%
Upper	3	4.9%	58	6.9%	10	16.4%	212	25.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	61	100.0%	836	100.0%	61	100.0%	836	100.0%
	<b>Consumer Loan Totals</b>							
Low	0	0.0%	0	0.0%	36	8.7%	397	5.7%
Moderate	38	9.2%	583	8.4%	73	17.6%	1,117	16.0%
Low/Moderate Total	38	9.2%	583	8.4%	109	26.3%	1,514	21.7%
Middle	328	79.2%	5,286	75.8%	65	15.7%	1,084	15.5%
Upper	48	11.6%	1,103	15.8%	56	13.5%	2,090	30.0%
Unknown	0	0.0%	0	0.0%	184	44.4%	2,284	32.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	414	100.0%	6,972	100.0%	414	100.0%	6,972	100.0%

**Consumer Loan Distribution Table**

Exam: Ohio Heritage Coshocton

Assessment Area/Group :Columbus Ohio MSA, Combined Years

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Direct Consumer</b>							
Low	0	0.0%	0	0.0%	5	13.2%	43	10.4%
Moderate	15	39.5%	132	31.9%	3	7.9%	39	9.4%
Low/Moderate Total	15	39.5%	132	31.9%	8	21.1%	81	19.8%
Middle	22	57.9%	262	63.5%	6	15.8%	80	19.5%
Upper	1	2.6%	19	4.6%	1	2.6%	17	4.2%
Unknown	0	0.0%	0	0.0%	23	60.5%	234	56.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	413	100.0%	38	100.0%	413	100.2%
	<b>Home Equity</b>							
Low	0	0.0%	0	0.0%	2	28.6%	100	37.9%
Moderate	0	0.0%	0	0.0%	1	14.3%	10	3.8%
Low/Moderate Total	0	0.0%	0	0.0%	3	42.9%	110	41.7%
Middle	5	71.4%	169	64.0%	0	0.0%	0	0.0%
Upper	2	28.6%	95	36.0%	4	57.1%	154	58.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	264	100.0%	7	100.0%	264	100.0%
	<b>Motor Vehicle</b>							
Low	0	0.0%	0	0.0%	1	100.0%	11	103.2%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	100.0%	11	103.2%
Middle	1	100.0%	11	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	11	100.0%	1	100.0%	11	103.2%
	<b>Consumer Loan Totals</b>							
Low	0	0.0%	0	0.0%	8	17.4%	154	22.4%
Moderate	15	32.6%	132	19.1%	4	8.7%	49	7.1%
Low/Moderate Total	15	32.6%	132	19.1%	12	26.1%	203	29.5%
Middle	28	60.9%	442	64.3%	6	13.0%	80	11.7%
Upper	3	6.5%	114	16.6%	5	10.9%	171	24.9%
Unknown	0	0.0%	0	0.0%	23	50.0%	234	34.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	688	100.0%	46	100.0%	688	100.0%



**CRA Loan Distribution Table**

Exam: Ohio Heritage Coshocton

Assessment Area/Group: Non Metro Ohio, Combined Years

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	13	11.7%	541	4.6%	0	0.0%	0	0.0%
Low/Moderate Total	13	11.7%	541	4.6%	0	0.0%	0	0.0%
Middle	84	75.7%	10,300	88.2%	0	0.0%	0	0.0%
Upper	14	12.6%	841	7.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	111	100.0%	11,682	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>							
Total \$1 Million or Less	60	54.1%	6,373	54.6%	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	51	45.9%	5,309	45.4%	0	0.0%	0	0.0%
Total	111	100.0%	11,682	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>							
\$100,000 or less	77	69.4%	2,651	22.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	22	19.8%	3,202	27.4%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	11	9.9%	4,630	39.6%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	0.9%	1,200	10.3%	0	0.0%	0	0.0%
Total	111	100.0%	11,682	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	39	65.0%	1,358	21.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	15	25.0%	2,339	36.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	10.0%	2,677	42.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	60	100.0%	6,373	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**CRA Loan Distribution Table**

Exam: Ohio Heritage Coshocton

Assessment Area/Group: Columbus Ohio MSA, Combined Years

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	1	1.8%	3	0.1%	0	0.0%	0	0.0%
Moderate	7	12.3%	385	7.4%	0	0.0%	0	0.0%
Low/Moderate Total	8	14.0%	388	7.5%	0	0.0%	0	0.0%
Middle	42	73.7%	3,472	66.7%	0	0.0%	0	0.0%
Upper	7	12.3%	1,343	25.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	57	100.0%	5,203	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>							
Total \$1 Million or Less	31	54.4%	2,776	53.3%	0	0.0%	0	0.0%
Over \$1 Million	1	1.8%	40	0.8%	0	0.0%	0	0.0%
Not Known	25	43.9%	2,387	45.9%	0	0.0%	0	0.0%
Total	57	100.0%	5,203	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>							
\$100,000 or less	43	75.4%	1,984	38.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	9	15.8%	1,333	25.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	8.8%	1,886	36.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	57	100.0%	5,203	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	25	80.6%	1,198	43.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	4	12.9%	536	19.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	6.5%	1,042	37.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	31	100.0%	2,776	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

## APPENDIX C

### GLOSSARY OF TERMS

**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 area/assessment area.

**Census tract:** 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 statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and 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:** All Agencies have adopted the following language. 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or,
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**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-scope review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-scope review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**Middle-income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

**Moderate-income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

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

**Owner-occupied units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution 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) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** A loan included in ‘loans to small farms’ as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Upper-income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.