

PUBLIC DISCLOSURE

June 3, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Croghan Colonial Bank
323 Croghan Street
Fremont, Ohio 43420

RSSD # 362717

Federal Reserve Bank of Cleveland
P.O. Box 6387
Cleveland, Ohio 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.

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INSTITUTION'S CRA RATING: This institution is rated Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors and criteria contribution to this rating include:

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs;
- A majority of loans and other lending-related activities are inside the assessment area;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income);
- The distribution of loans to businesses reflects a reasonable penetration among businesses of different revenue sizes given the demographics of the assessment areas;
- The geographic distribution of loans reflects an excellent dispersion throughout the assessment areas;
- The community development activities demonstrate an adequate responsiveness to the community development needs of the assessment area, and;
- There were no CRA-related complaints filed against the bank since the previous CRA Evaluation.

The prior CRA Evaluation conducted July 11, 2016, resulted in a "Satisfactory" performance rating.

SCOPE OF EVALUATION

The Croghan Colonial Bank (Croghan) Community Reinvestment Act (CRA) performance is evaluated using the interagency intermediate small bank evaluation procedures under Regulation BB.

Croghan’s CRA performance is evaluated based on lending data for the period of January 1, 2016, to December 31, 2017 for Home Mortgage Disclosure Act (HMDA) loans and July 1, 2017 to December 31, 2017 for consumer and small business loans. The products evaluated include consumer, residential, and commercial loans. Consumer loans are comprised of credit card, home equity, motor vehicle, and other-secured loans. HMDA loans are comprised of home purchase and refinance loans.

Community development activities for the period between July 11, 2016 through June 2, 2019 also were reviewed as part of this evaluation, specifically community development loans, investments, and services since the previous evaluation.

Croghan’s assessment area for CRA purposes is comprised of the following two assessment areas, and the scope of the review for each area is determined based on the volume of lending activity and deposit share:

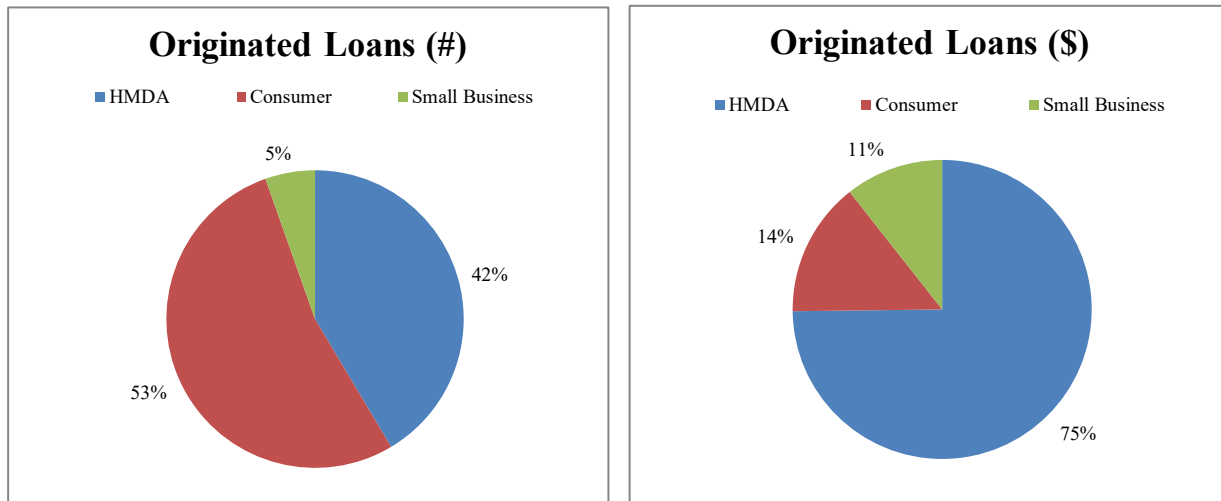
- Non-metropolitan Ohio – Full-scope evaluation
- Toledo Ohio Metropolitan Statistical Area (MSA) #45780 – Limited-scope evaluation

A detailed description of each assessment area is presented in subsequent sections of this performance evaluation.

Two community contact interviews were conducted to provide perspective on the credit needs of the assessment areas in which the bank operates. Details from these interviews are presented within the respective assessment areas of this evaluation.

The following table and charts illustrate the volume and distribution of loans originated in Croghan’s assessment area during the evaluation period.

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
HMDA	620	109,154
Consumer	795	21,271
Small Business	81	15,485
Total	1,496	145,910



Based on total loan volume by number and the composition of the loan portfolio, consumer lending receives the most weight, followed by HMDA and small business lending. The bank originated too few home improvement, multi-family, other-unsecured, and small farm loans to perform a meaningful analysis; therefore, those products are not discussed in this evaluation.

For the purpose of this evaluation, borrower distribution receives greater weight than geographic distribution given the limited number of low- and moderate-income and distressed or underserved middle-income census tracts.

The size and financial condition of the bank, lending opportunities in the assessment area, and competition with other institutions also were considered in the bank's performance context.

DESCRIPTION OF INSTITUTION

Croghan is a state member bank headquartered in Fremont, Ohio and is the banking subsidiary of Croghan Bancshares, Inc., Fremont, Ohio. The institution operates primarily in northcentral Ohio. As of December 31, 2018, Croghan reported total assets of \$762.4 million and total deposits of \$673.4 million. Croghan changed its delineated assessment area since the previous evaluation to exclude three census tracts in Henry County. Croghan had no branches in Henry County, which was part of the Toledo Ohio MSA.

Croghan operates 17 branch locations in the assessment area, 16 automated teller machines (ATM), and one stand-alone ATM. By tract category, branches are distributed as follows:

- Low-Income Tracts: None
- Moderate-Income Tracts: One branch with an ATM in Fremont, Ohio
- Middle-Income Tracts: 12 branches, 11 with ATMs (three in Fremont, Ohio, two in Port Clinton, Ohio, and one each in : Green Springs, Ohio, Bellevue, Ohio, Clyde, Ohio, Monroeville, Ohio, Norwalk, Ohio, Oak Harbor, Ohio and Tiffin, Ohio)
- Upper-Income Tracts: Four branches with ATMs (one each in: Curtice, Ohio, Fremont, Ohio, Oregon, Ohio, and Tiffin, Ohio)

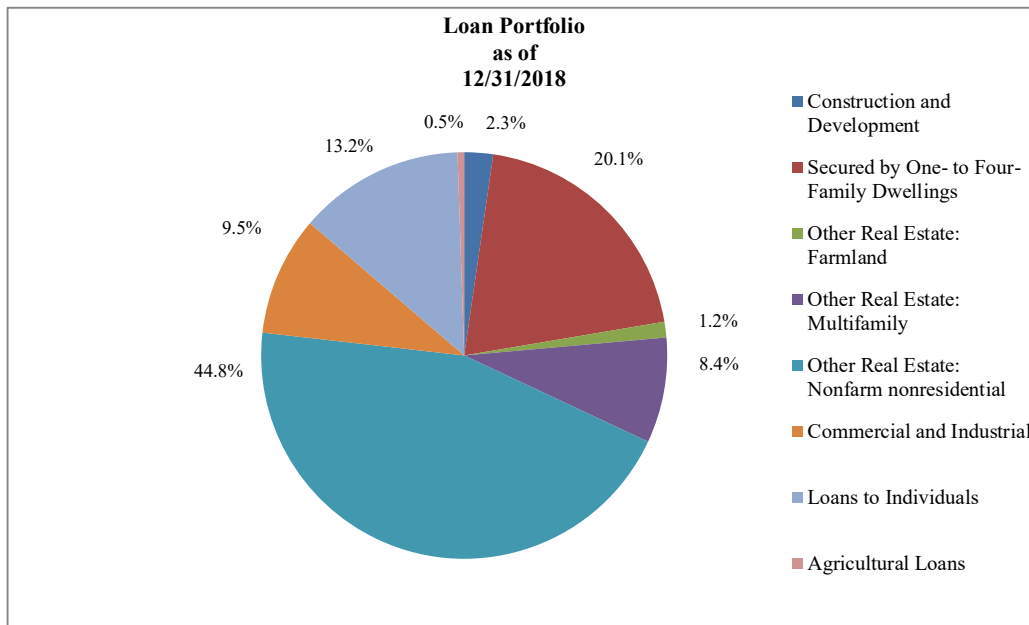
Croghan operates a loan production office (LPO) in the assessment area in an Upper-Income Tract. One stand-alone ATM, in an Upper-Income Tract, was closed since the prior evaluation.

As of December 31, 2018, net loans and leases represent \$608.3 million or 79.8% of total assets. Net loans and leases increased 15.9% since the previous CRA evaluation due to organic growth. Croghan is a full-service retail bank offering a wide variety of consumer, residential real estate, commercial, and agricultural loan products to fulfill the credit needs of the residents and businesses in the assessment areas. Consumer loan products include direct and indirect auto loans, boat and recreational vehicle loans, personal and overdraft lines of credit, installment loans, home equity loans and lines of credit, mortgage loans, and credit cards. Croghan also offers construction lending and commercial loan products including loans, lines of credit, and business credit cards.

The table/chart below illustrate Croghan’s loan portfolio composition as of December 31, 2018.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2018		12/31/2017		12/31/2016	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	14,072	2.3%	7,538	1.3%	4,174	0.8%
Secured by One- to Four- Family Residential	123,031	20.1%	124,319	21.1%	134,719	24.3%
Other Real Estate: Farmland	7,639	1.2%	6,869	1.2%	8,115	1.5%
Other Real Estate: Multifamily	51,435	8.4%	59,815	10.1%	48,714	8.8%
Other Real Estate: Nonfarm nonresidential	275,043	44.8%	263,610	44.6%	244,996	44.3%
Commercial and Industrial	58,198	9.5%	60,529	10.3%	57,115	10.3%
Loans to Individuals	80,960	13.2%	64,791	11.0%	52,090	9.4%
Agricultural Loans	3,238	0.5%	3,005	0.5%	3,610	0.7%
Total	\$613,616	100.00%	\$590,476	100.00%	\$553,533	100.00%

* 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 known legal or financial constraints preventing Croghan from meeting the credit needs of the assessment area.

DESCRIPTION OF ASSESSMENT AREAS

The following summarizes Croghan's assessment areas evaluated as part of this CRA performance evaluation:

- Non-metropolitan Ohio consisting of the entireties of Erie, Huron, Ottawa, Sandusky, and Seneca Counties.
- Toledo Ohio MSA #45780, consisting of Lucas and Wood Counties (excludes Fulton County and, as previously mentioned, no longer including three census tracts in Henry County).

Croghan's assessment areas consist of 230 census tracts. Specifically, the assessment areas contain 36 low-, 38 moderate-, 98 middle-, and 55 upper-income census tracts, and three unknown tracts. The Main Office and 15 branches are in Non-metropolitan Ohio. The Main Office and 11 branches are in middle-income census tracts. One branch is in a moderate-income census tract and three are in upper-income census tracts. None of Non-metropolitan Ohio's middle-income tracts are designated as distressed or underserved. Croghan has one branch in an upper-income tract in the Toledo Ohio MSA.

Erie County has the largest population of all counties in Non-metropolitan Ohio, with Sandusky as the county seat. According to the 2010 U.S. Census Bureau Report, the population in Sandusky was 77,079. The counties' land use in Non-metropolitan Ohio is mainly cropland, which could impact the level of lending in the assessment area.

Lucas County has the largest population of all counties in the assessment areas, with Toledo as

the county seat. According to the 2010 U.S. Census Bureau Report, the population in Lucas County was 441,815. The majority of Lucas County is urban land use, which could impact the level of lending in the assessment area. Competition is high, as several major regional banks operate in this area. Croghan has a loan production office in an upper-income census tract in Maumee in Lucas County.

As of June 30, 2018, the Federal Deposit Insurance Corporation (FDIC) reported 32 insured financial institutions operating in Erie, Huron, Lucas, Ottawa, Sandusky, Seneca, and Wood Counties. The FDIC’s market share report indicates that Croghan is ranked sixth, holding 4.6% of the market share of deposits.¹ The following table illustrates the deposit market share for the top ten financial institutions in the counties.

#	Financial Institution	Deposit Market Share
1	Fifth Third Bank	20.3%
2	The Huntington National Bank	18.7%
3	KeyBank National Association	10.5%
4	PNC Bank National Bank	9.2%
5	Signature Bank National Association	5.0%
6	The Croghan Colonial Bank	4.6%
7	Civista Bank	4.6%
8	Citizens Bank National Association	4.5%
9	Waterford Bank, NA	4.0%
10	First Federal Bank of the Midwest	2.9%

Community Contacts

Two community contact interviews were conducted with representatives from economic development and community and social services organizations operating in Croghan’s assessment area. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the assessment area. Information obtained from these interviews helped establish a context for the communities in which Croghan operates and gather information on the bank’s performance.

Community contacts identified workforce development, financial education training, and supportive services for struggling individuals and families impacted by the opioid crisis as potential opportunities for financial institutions to provide assistance in the assessment area. In addition, the contacts identified several opportunities for bank participation. More detailed information obtained from the individual community contacts is included in the “Description of the Institution’s Operations” section of the full-scope assessment area evaluations.

¹ <https://www5.fdic.gov/sod/sodMarketBank.asp?barItem=2>

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Croghan’s overall performance under the lending test is satisfactory. Lending performance in both assessment areas is reasonable.

Loan-to-Deposit Ratio

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

The following table illustrates Croghan’s quarterly LTD ratios since the previous evaluation, along with the average LTD ratios for three local peer banks for the same period. The custom peer LTD ratio is the combined aggregate LTD ratio for all three peer banks. This information is from the Deposit Market Share Report².

Croghan Colonial Bank Loan-to-Deposit Ratios					
AS OF DATE	CROGHAN COLONIAL BK	OLD FT BKG CO	WATERFORD BK NA	CIVISTA BK	CUSTOM PEER
December 31, 2018	90.33	68.01	90.71	96.87	85.20
September 30, 2018	84.96	66.26	88.67	94.65	83.19
June 30, 2018	85.55	66.90	91.09	99.96	85.98
March 31, 2018	83.28	65.45	86.43	86.52	79.47
December 31, 2017	86.24	66.44	85.54	93.41	81.80
September 30, 2017	83.29	65.83	78.64	91.97	78.81
June 30, 2017	82.19	67.37	79.75	91.10	79.41
March 31, 2017	80.35	66.02	81.00	78.83	75.28
December 31, 2016	82.74	66.64	82.71	92.75	80.70
September 30, 2016	81.26	64.41	79.70	90.92	78.34
June 30, 2016	79.24	64.55	90.03	90.86	81.81
March 31, 2016	80.04	64.24	95.72	77.17	79.04
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation	83.29	66.01	85.83	90.42	80.75

Croghan’s average LTD ratio was 83.29% over the past 12 quarters. Croghan’s LTD ratio is compared to three local peer banks: Old Fort Banking Company in Tiffin, Ohio, Waterford Bank NA in Toledo, Ohio and Civista Bank in Sandusky, Ohio. Croghan’s LTD ratio aligns with Waterford Bank NA, is well above Old Fort Banking Company, and is below Civista Bank.

Considering the bank’s lending-related activity, size, financial condition, and assessment area credit needs, Croghan’s LTD ratio is reasonable.

Lending in the Assessment Area

The bank’s consumer, mortgage, and small business lending was analyzed to determine the

² <https://www5.fdic.gov/sod/sodMarketBank.asp?barItem=2>

volume of lending inside and outside the assessment area. Of the total loans, 89.6% by volume and 83.4% by dollar amount were made inside the assessment area.

The following table shows the distribution of loans made inside and outside the assessment area.

Loan Type - Description	Inside				Outside				Total			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
CC - Credit Card	85	96.6	263	99.0	3	3.4	3	1.0	88	100.0	266	100.0
HE - Home Equity	92	98.9	3,860	99.8	1	1.1	8	0.2	93	100.0	3,867	100.0
MV - Motor Vehicle	330	91.7	6,034	91.7	30	8.3	545	8.3	360	100.0	6,580	100.0
OS - Other - Secured	133	58.8	3,728	35.6	93	41.2	6,749	64.4	226	100.0	10,476	100.0
OU - Other - Unsecured	28	100.0	82	100.0	0	0.0	0	0.0	28	100.0	82	100.0
Total Consumer related	668	84.0	13,967	65.7	127	16.0	7,304	34.3	795	100.0	21,271	100.0
CV - Home Purchase - Conventional	185	97.4	23,314	96.5	5	2.6	849	3.5	190	100.0	24,163	100.0
HI - Home Improvement	38	97.4	2,098	99.6	1	2.6	8	0.4	39	100.0	2,106	100.0
MF - Multi-Family Housing	5	71.4	5,105	60.4	2	28.6	3,350	39.6	7	100.0	8,455	100.0
RF - Refinancing	50	98.0	5,116	36.2	1	2.0	9,000	63.8	51	100.0	14,116	100.0
CV - Home Purchase - Conventional	183	96.3	22,589	96.1	7	3.7	926	3.9	190	100.0	23,515	100.0
HI - Home Improvement	37	94.9	1,416	77.5	2	5.1	410	22.5	39	100.0	1,826	100.0
MF - Multi-Family Housing	15	88.2	23,382	98.0	2	11.8	485	2.0	17	100.0	23,867	100.0
RF - Refinancing	86	98.9	11,024	99.3	1	1.1	82	0.7	87	100.0	11,106	100.0
Total HMDA related	599	96.6	94,044	86.2	21	3.4	15,110	13.8	620	100.0	109,154	100.0
SB - Small Business	74	91.4	13,715	88.6	7	8.6	1,770	11.4	81	100.0	15,485	100.0
Total Small Bus. related	74	91.4	13,715	88.6	7	8.6	1,770	11.4	81	100.0	15,485	100.0
TOTAL LOANS	1,341	89.6	121,726	83.4	155	10.4	24,184	16.6	1,496	100.0	145,910	100.0

Therefore, a majority of Croghan's loans by volume and dollar amount were made in the assessment area.

Geographic Distribution of Lending

Croghan's geographic distribution of lending is excellent. Geographic distribution was weighted less than borrower distribution due to the lower number of low- and moderate-tracts in the assessment areas. Geographic distribution is excellent in the Non-metropolitan Ohio and Toledo Ohio MSA. Consumer lending, which received the most weight, along with HMDA lending, are excellent. Small business lending is reasonable. The respective analyses are included in each assessment area evaluation later in this evaluation.

In addition to traditional bank products, Croghan originates loans through flexible lending programs. These programs can allow financial institutions to address credit needs of low- and moderate- income borrowers in a safe and sound manner. These programs are primarily designed to assist first-time homebuyers with needed down payment or closing costs or small businesses with access to capital. During the evaluation period, Croghan originated loans through the following flexible lending programs:

- Federal Home Loan Bank (FHLB) of Cincinnati Welcome Home Program: This FHLB program provides down payment and closing cost assistance to low- and moderate-income individuals funded through direct subsidies from member banks.
- Small Business Administration (SBA) 504 Loan Guarantee Program: This is the SBA's primary program for providing financial assistance to small businesses. Borrowers acquire financing at reasonable terms with lenders, who receive a partial guarantee on the SBA loan after following certain conditions/requirements set by the SBA. Croghan also participates in

the SBA Express Loan Program, under which loans are partially guaranteed by the SBA with expedited credit decisions from the SBA.

- U.S. Department of Agriculture/Rural Housing Service (USDA) - Consumer: The State of Ohio provides assistance for homeowners to help them remain in their homes and avoid foreclosure. Save the Dream Ohio is administered by the Ohio Housing Finance Agency and funded by the US Department of the Treasury's Hardest Hit Fund.
- U.S. Department of Agriculture/Rural Housing Service (USDA): This loan program is designed to assist low- and moderate-income individuals in purchasing affordable housing in rural areas. There are no down payment or mortgage insurance requirements.

Borrower Distribution of Lending

Croghan's lending to borrowers of different income levels and businesses of different revenue sizes is reasonable. Consumer lending, which receives the greatest weight, is reasonable as are HMDA and small business lending. The respective analyses can be found in each assessment area discussion later in this evaluation.

Response to Consumer Complaints

Croghan has not received any CRA-related complaints since the prior evaluation.

Community Development Test

Community Development Loans

During this evaluation period, Croghan originated one community development loan totaling \$110,000, which is considered to be a very poor level of community development loans. The loan was originated in the Non-metropolitan Ohio assessment area and details on this loan can be found in this assessment area's analysis.

There was no community development lending activity in the Toledo Ohio MSA. While Croghan does not have a large branch presence in this area, community development lending in these assessment areas is also considered very poor.

Qualified Investments

Croghan made seven community development investments totaling \$3.6 million during this evaluation period. Six investments were made in Non-metropolitan Ohio and one was made in the Toledo Ohio MSA. Various donations also were made throughout the assessment areas with 12 made in Non-metropolitan Ohio totaling \$62,000 and three in the Toledo Ohio MSA for \$1,385. This represents an excellent level of community development investments.

Community Development Services

Overall, Croghan provides an adequate level of community development services in the assessment areas. Seventeen employees served at 21 different organizations for a total of 1,458 hours. Croghan's officers and staff members provided their financial expertise to the community by engaging in activities that promoted or facilitated affordable housing, services for low- and moderate-income individuals, and economic development. Examples of board and committee membership positions held include vice presidents, treasurers, trustees, and members.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE
NON-METROPOLITAN OHIO ASSESSMENT AREA**
(Full-scope Evaluation)

The Non-metropolitan Ohio assessment area includes the entireties of Erie, Huron, Ottawa, Sandusky, and Seneca Counties. The assessment area consists of 74 census tracts, of which 11 are moderate- (14.9%), 42 are middle-income (52.8%), and 20 are upper-income (27.0%).

A majority of the banking centers (16 of 17) are in Non-metropolitan Ohio. None of the middle-income census tracts are listed on the Federal Financial Institutions Examinations Council's list of distressed or underserved non-metropolitan middle-income geographies, as defined by the Community Development Financial Institutions for 2016 or 2017.

Erie County is directly south of Lake Erie in northern Ohio and is a mixture of cropland and forest areas (72.8%) and urban areas (19.3%). Sandusky is the largest city and county seat. The county had a population of 77,079 according to the 2010 U.S. Census.

Huron County is directly south of Erie County in northern Ohio and is a mixture of cropland and forest areas (85.9%) and urban areas (9.2%). Norwalk is the largest city and county seat. The county had a population of 59,626 according to the 2010 U.S. Census.

Ottawa County is directly south of Lake Erie in northern Ohio and is a mixture of cropland and wetland areas (72.2%) and urban areas (15.2%). Port Clinton is the largest city and county seat. The county had a population of 41,428, according to the 2010 U.S. Census.

Sandusky County is directly south of Ottawa County in northern Ohio and is a mixture of cropland (74.5%) and urban areas (11.9%). Fremont is the largest city and county seat. The county had a population of 60,944, according to the 2010 U.S. Census.

Seneca County is directly south of Sandusky County in northern Ohio and is a mixture of cropland (79.4%) and urban areas (9.0%). Tiffin is the largest city and county seat. The county had a population of 56,745, according to the 2010 U.S. Census.

According to the June 30, 2018 Federal Deposit Insurance Corporation (FDIC) Market Share Report, Croghan had 14.1% of the deposits and is ranked second of 22 institutions in this market. The FDIC market share report below illustrates the market share held by the top ten financial institutions in Non-Metropolitan Ohio.³

³ <https://www5.fdic.gov/sod/sodMarketBank.asp?barItem=2>

#	Financial Institution	Deposit Market Share
1	Civista Bank	14.6%
2	The Croghan Colonial Bank	14.1%
3	PNC Bank National Bank	9.0%
4	KeyBank National Association	8.4%
5	The Huntington National Bank	8.1%
6	The Old Fort Banking Company	7.7%
7	Fifth Third Bank	7.2%
8	Sutton Bank	6.7%
9	US Bank National Association	4.6%
10	The First National Bank of Bellevue	4.0%

Two community contact interviews were conducted to provide information regarding credit needs of the local community and context to the demographic and economic characteristics discussed. The first contact, representing an economic development organization, stated the organization is focused on business expansion and retention. The organization recently established a small business entrepreneurship program to help small businesses succeed. The program teaches business owners about starting a small business, managing finances, developing business plans, marketing, sales, and providing access to helpful resources. According to the contact, Sandusky and Erie counties have larger-than-average senior populations (65 years and older) compared to other counties in Ohio, because the Sandusky area tends to be a popular destination for retirees. The larger senior population provides benefits and challenges to the area. Retirees tend to have higher disposable incomes and support local businesses but also represent a depleted tax base. Given the area's demographics, the organization partnered with several other communities to perform an area needs assessment, which will be completed in the fall of 2019; the needs assessment will be used to develop forthcoming economic development plans. While the senior population is increasing, the area's overall population and particularly its working-age population is decreasing. The contact said the area's shrinking working-age population is most likely due to the limited number of higher paying professional jobs; therefore, this demographic is relocating to larger cities (i.e., Cleveland and Toledo) that have more professional-level employment opportunities. Another factor impacting the workforce is the opioid crisis that adds to the lack of available skilled workers in the area, mostly in the manufacturing sector. The organization, in partnership with multiple community stakeholders, is designing a workforce survey to identify current challenges and future needs of area employers.

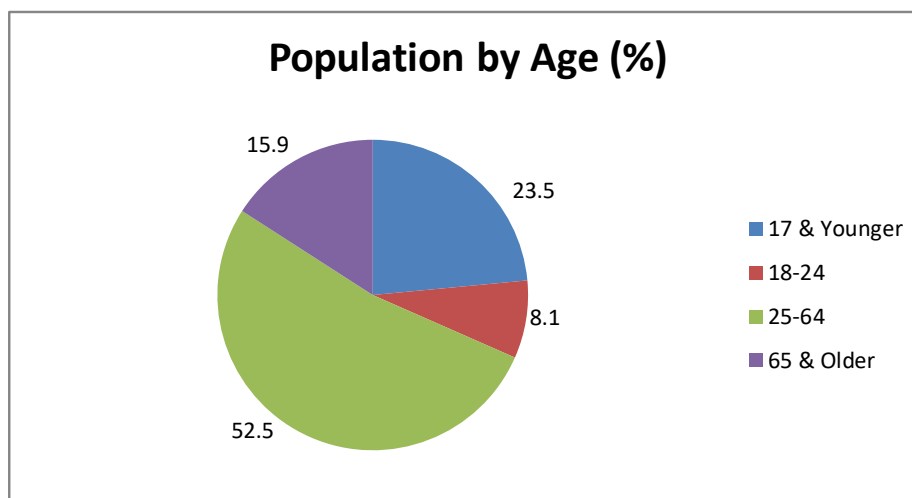
The second contact, representing a community action partnership, explained that they provide a multitude of services targeted toward low- and moderate-income individuals and families in Northwest Ohio. Programs include child care and education, homeless assistance, home rehabilitation, job training and placement, senior services, small business assistance, utility payment assistance, and transportation assistance. The contact stated Sandusky County was severely impacted by the financial downturn, resulting in a number of foreclosures; however, while the county's housing market continues to rebound, affordable housing is a critical need. Housing stock in lower-income areas is primarily rental properties that are aged (65 years +) and

typically in need of maintenance that may go overlooked due to the high cost of repairs. The community has also been highly impacted by the opioid epidemic. The repercussions of addiction extend beyond the addicted individuals, affecting child welfare, public safety, criminal justice, the economy, caregiving, and housing. According to the contact, jobs in manufacturing and other skilled trades are available but finding a dependable workforce is challenging as a result of drug use, family life, and transportation constraints. Given the area's challenges, the contact said there is a need for financial institutions to provide low-cost loans for housing repairs.

There also are opportunities for financial institutions to develop relationships with the unbanked and under-banked population through product offerings that incentivize savings and financial literacy training. The contact stated that large financial institutions appear to be more committed to assisting lower-income individuals and geographies than local and regional banks.

Population Characteristics

According to the 2010 U.S. Census, the total population in the assessment area was 295,822. Approximately 9.5% of the assessment area's population resides in moderate-income tracts and 59.5% in middle-income tracts. There are no low-income tracts in this assessment area. As shown in the chart below, 76.5% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 60.6% of the population is between the ages of 18 and 64 and more likely to have credit needs.



The population in Non-metropolitan Ohio is decreasing, as depicted in the following table, which shows the population change over the 2010 U.S. Census figure.⁴

⁴ <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

County	2010 Population	2017 Population	Population Percent Change
Erie	77,079	74,817	-2.9%
Huron	59,626	58,494	-1.9%
Ottawa	41,428	40,657	-1.9%
Sandusky	60,944	59,195	-2.9%
Seneca	56,745	55,243	-2.6%
Total	295,822	288,406	

Income Characteristics

The 2010 median family income (\$57,241) in the assessment area was less than Ohio's (\$59,680). As shown below, the assessment area median family income decreased to \$55,400 in 2016 and increased to \$57,600 in 2017 to be slightly above the 2010 median family income.

		Ohio State Non-Metro											
HUD Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2016	\$55,400	0	-	\$27,699	\$27,700	-	\$44,319	\$44,320	-	\$66,479	\$66,480	-	& above
2017	\$57,600	0	-	\$28,799	\$28,800	-	\$46,079	\$46,080	-	\$69,119	\$69,120	-	& above

Between 2016 and 2017, the poverty rates in assessment area decreased in all but two counties. Huron and Seneca counties experienced the greatest increase in poverty rates. Huron's rate was greater than both the state and nation while Seneca's rate was greater than the nation. Ottawa and Sandusky counties experienced the greatest decreases in poverty rates.

County	2016 Poverty Rate	2017 Poverty Rate	Change
Erie County	12.50%	12.40%	-0.80%
Huron County	12.20%	14.80%	21.31%
Ottawa County	10.40%	8.90%	-14.42%
Sandusky County	11.60%	11.10%	-4.31%
Seneca County	12.90%	13.60%	5.43%
Ohio	14.50%	13.90%	-4.14%
United States	14.00%	13.40%	-4.29%

According to the Census Bureau's 2015 American Community Survey (ACS), 12.3% of the 116,792 households in this assessment area are below the poverty level, 2.6% are receiving public assistance, and 39.5% have rent costs greater than 30.0% of their monthly income. Of the families that are households, 10.0% are below the poverty level. In addition, low- and moderate-income families represent 35.3% of all families in this assessment area, while low- and moderate-income households represent 36.6% of all households in this assessment area.

Housing Characteristics

According to the Census Bureau's 2015 ACS, there are 141,056 housing units and 78,225 families in the assessment area. From an income perspective, 13.3% of the housing units and

12.5% of families are in the assessment area’s moderate-income tracts. Also, 46.7% of the housing units in moderate-income tracts are owner-occupied, and over half of the housing units are either rental (42.2%) or vacant (11.20%). In addition, 14.9% of housing units are multi-family with five or more units. Therefore, based on the limited number of moderate-income tracts, families and housing units and the high percentage of rental/vacant/multi-family units, there appear to be limited credit-related opportunities for Croghan to make home purchase loans and provide various aspects of affordable housing in these tracts.

The Census Bureau’s 2015 ACS shows the median age of housing stock was 58 years old, and 33.5% of the assessment area’s 141,056 housing units are at least 65 years old (built before 1950). This indicates there may be opportunities to make home improvement loans. The median housing value in the assessment area was \$117,918 with an affordability ratio of 41.1%. 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. Further, based on the 2017 median family income for the Non-metropolitan Ohio assessment area (\$57,600), approximately 42.8% of the homes valued up to \$105,568 would be considered affordable for low-income individuals and 71.9% valued up to \$168,910 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 4.0% fixed-rate, 30-year loan.

According to Sperling’s Best Places, the 2018 median home cost in Erie County was \$130,100, an appreciation of 6.7% over the prior year.⁵ The 2018 median home cost in Huron County was \$112,500, an appreciation of 7.4% since the prior year. The 2018 median home cost in Ottawa County was \$144,400, an appreciation of 8.0% over the prior year. The 2018 median home cost in Sandusky County was \$118,700, an appreciation of 9.5% over the prior year. Lastly, the 2018 median home cost in Seneca County was \$98,300, an appreciation of 11.7% over the prior year. The following table highlights foreclosure ratios⁶ within the Non-metropolitan Ohio assessment area. Huron, Sandusky, and Seneca Counties have foreclosure filing ratios above the State of Ohio, while all counties except Ottawa County have ratios above the Nation.

Geography Name	Ratio of Properties Receiving Foreclosure Filings in (April 2019)
Erie County	1:2,348
Huron County	1:1,641
Ottawa County	1:2,598
Sandusky County	1:1,512
Seneca County	1:1,065
Ohio	1:1,792
United States	1:2,433

⁵ Sperling’s Best Places, www.bestplaces.net

⁶ www.realtytrac.net

According to Census Bureau’s 2015 ACS, 40.8% of renters in the assessment area have rent costs greater than \$700 a month and nearly 39.5% of renters are considered to be cost burdened as they have rent costs greater than 30.0% of their monthly income. Higher rental costs may make it more difficult for potential first-time homebuyers to save enough money to make a large enough down payment in the rising interest rate environment. In addition, a community contact indicated the need for more affordable housing assistance and provide low-cost loans to help rehabilitate aged, dilapidated housing stock in the older parts of the assessment area.

Building permits are a leading indicator of future activity in the construction sector. As indicated in the table below, building permits fell well below statewide and national trends between 2016 and 2017 except in Sandusky County which saw an increase of 29.7%.⁷

Geography	2016	2017	Percent of Change 2016-2017
Erie	96	86	-10.42%
Huron	46	33	-28.26%
Ottawa	135	114	-15.56%
Sandusky	37	48	29.73%
Seneca	74	28	-62.16%
Ohio	22,816	23,917	4.83%
U.S.	1,206,642	1,281,977	6.24%

The overall decrease in the number of permits could indicate a decreasing demand for home purchase loans during this evaluation period, except in Sandusky County.

Labor, Employment, and Economic Characteristics

According to Dun & Bradstreet, the majority of businesses (87.7%) in the assessment area have revenues under \$1 million. The Ohio Office of Policy, Research, and Strategic Planning shows that the largest industries by average employment are leisure and hospitality, manufacturing, and trade, transportation, and utilities. The following table identifies the employment sectors and major employers in this assessment area:⁸

⁷ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

⁸ http://www.development.ohio.gov/reports/reports_countytrends_map.htm

County	Primary Employment Sectors	Major Employers
Erie	Leisure and Hospitality; Trade, Transportation and Utilities; Manufacturing; Education and Health Services; Local Government	Cedar Fair/CedarPoint; Erie County Government; Firelands Regional Medical Center; Flex-N-Gate/Ventra Corporation; Freudenberg NOK; International Automotive Components; Kalahari Resorts; Sandusky City Schools; State of Ohio
Huron	Manufacturing; Trade, Transportation and Utilities; Education and Health Services; Local Government; Leisure and Hospitality	Berry Plastics/Venture Packaging; Pepperidge Farm/Campbell Soup Co; Fisher-Titus Medical Center; Huron County Government; LSC Communication; MTD Products/Midwest Inds; New Horizons Baking Co.; Norwalk Area Health Systems; Norwalk City Schools; Norwalk Custom Order Furniture
Ottawa	Trade, Transportation and Utilities; Leisure and Hospitality; Manufacturing; Local Government; Education and Health Services	Benton-Carroll-Salem Local Schools; FirstEnergy Corp/Davis Besse; Fenner Dunlop; Luther Home of Mercy; Magruder Hospital; Materion Brush/Brush Wellman Inc; Ottawa County Government; Port Clinton City Schools; US Gypsum Co; Wal-Mart Stores Inc
Sandusky	Manufacturing; Trade, Transportation and Utilities; Education and Health Services; Local Government; Leisure and Hospitality	Atlas Industries; Bellevue Hospital; Crown Battery; Eaton INOAC; Fremont City Schools; Kraft Heinz; International Automotive Component; Memorial Hospital; Revere Plastics Inc; Sandusky County Government; Style Crest/Poly-Foam Int'l; Whirlpool Corp
Seneca	Manufacturing; Trade, Transportation and Utilities; Education and Health Services; Local Government; Leisure and Hospitality	American Fine Sinter; Dorel Industries/Ameriwood Ind; Fostoria City Schools; FRAM Group Operations LLC; Heidleberg College; Mercy Hospital of Tiffin; National Machinery LLC; Roppe Corp; State of Ohio; Tiffin City Schools; Tiffin University; Toledo Molding & Die Inc; Webster Industries Inc

Erie County is known as the Lake Erie Shores & Island region and is considered a popular tourist attraction. Erie County is home to Cedar Point Amusement Park and several other popular indoor waterpark resorts. According to the Ohio Reporting Agency, Cedar Point Amusement Park and Kalahari Resort and Convention Center are among the area’s top employers.

In 2018 Cedar Point announced the building of a \$28 million dollar indoor sports center. The facility will contain a sports medicine and orthopedic facility funded and operated by Firelands Regional Medical Center (another area top employer). The new facility is projected to bring an additional 70,000 visitors and generate an annual economic impact of \$20 million that will benefit area hotels, restaurants, gas stations, stores, and other area attractions. The facility is projected to generate \$700,000 in new annual tax revenue for local schools, governments, and other public services. Construction is expected to take 15 to 18 months and be completed by mid-2020. Cedar Point provided the land for the facility and will have responsibility for operations and maintenance. Cedar Point contributed \$5 million toward the cost of the project, while the majority of the funding (\$23 million) is coming from Erie County through its bed tax.⁹

The table below illustrates the average unemployment rates related to this assessment area:

⁹ Port Clinton News Herald (July 11, 2018): <https://www.portclintonnews herald.com/story/news/local/2018/07/11/new-28-million-indoor-facility-coming-cedar-point-sports-center/773119002/>

**Unemployment Rates
Croghan Colonial Bank - Nonmetropolitan Ohio**

Area	Years - Annualized	
	2016	2017
Erie Co.	5.9	6.2
Huron Co.	7.3	6.5
Ottawa Co.	7.8	7.9
Sandusky Co.	5.0	4.8
Seneca Co.	5.1	4.6
Ohio	5.0 (D)	4.4 (D)
National	4.5	3.9

Not Seasonally Adjusted

D: Reflects Revised Population Controls and Model Reestimation

P: Preliminary as of March 2019

Data extracted on March 26, 2019

The unemployment rates across the assessment area declined between 2016 and 2017 for three counties (Huron, Sandusky, and Seneca), remained relatively stable in Ottawa County and increased in Erie County. Unemployment rates remained higher than the State and the Nation during the period reviewed. Community contacts indicated that higher unemployment rates in this assessment area may be the result of the opioid crisis.

The following table illustrates the largest percentage of land use in each county in the assessment area:¹⁰

County	Urban	Cropland	Pasture	Forest	Open Water	Bare Mines	Wetlands
Erie	19.29%	54.73%	2.22%	18.02%	1.63%	1.79%	2.32%
Huron	9.24%	68.78%	3.20%	17.10%	0.81%	0.17%	0.68%
Ottawa	15.23%	59.99%	0.60%	6.02%	4.53%	1.45%	12.18%
Sandusky	11.87%	74.46%	0.94%	7.28%	1.06%	0.72%	3.67%
Seneca	8.99%	79.39%	1.87%	8.83%	0.43%	0.32%	0.17%

Urban land use, which includes land used for residential, commercial, industrial, or transportation or as urban grasses, represents less than 20% of available land in the assessment area. The remaining land does not contain housing, businesses, and schools, which may impact Croghan’s ability to originate all types of loans in this assessment area.

The following tables illustrate the demographics in the Non-metropolitan Ohio assessment area.

¹⁰ http://www.development.ohio.gov/reports/reports_countytrends_map.htm

Combined Demographics Report

Assessment Area(s): 2016 Non Metropolitan Ohio

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	13,359	16.2
Moderate-income	7	9.5	6,563	8	1,072	16.3	14,149	17.2
Middle-income	44	59.5	49,463	60.1	4,526	9.2	17,939	21.8
Upper-income	22	29.7	26,305	32	1,343	5.1	36,884	44.8
Unknown-income	1	1.4	0	0	0	0	0	0
Total Assessment Area	74	100.0	82,331	100.0	6,941	8.4	82,331	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	13,246	6,591	7.3	49.8	4,729	35.7	1,926	14.5
Middle-income	82,651	53,652	59.7	64.9	18,090	21.9	10,909	13.2
Upper-income	45,222	29,699	33	65.7	6,246	13.8	9,277	20.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	141,119	89,942	100.0	63.7	29,065	20.6	22,112	15.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,088	10.1	939	9.8	138	13.7	11	5.4
Middle-income	6,082	56.3	5,381	56.1	583	57.8	118	58.1
Upper-income	3,629	33.6	3,268	34.1	287	28.5	74	36.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	10,799	100.0	9,588	100.0	1,008	100.0	203	100.0
Percentage of Total Businesses:			88.8		9.3		1.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0
Moderate-income	15	1.7	14	1.6	1	7.1	0	0
Middle-income	541	59.9	532	59.8	9	64.3	0	0
Upper-income	347	38.4	343	38.6	4	28.6	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	903	100.0	889	100.0	14	100.0	0	.0
Percentage of Total Farms:			98.4		1.6		.0	

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area(s): 2017 Non Metropolitan Ohio

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	13,720	17.5
Moderate-income	11	14.9	9,771	12.5	2,363	24.2	13,856	17.7
Middle-income	42	56.8	46,446	59.4	4,440	9.6	17,024	21.8
Upper-income	20	27	22,008	28.1	989	4.5	33,625	43
Unknown-income	1	1.4	0	0	0	0	0	0
Total Assessment Area	74	100.0	78,225	100.0	7,792	10.0	78,225	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	18,754	8,754	10.4	46.7	7,904	42.1	2,096	11.2
Middle-income	82,123	49,836	59.1	60.7	19,076	23.2	13,211	16.1
Upper-income	40,179	25,793	30.6	64.2	5,429	13.5	8,957	22.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	141,056	84,383	100.0	59.8	32,409	23.0	24,264	17.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,296	13.2	1,129	13.2	154	15.3	13	6.5
Middle-income	5,621	57.4	4,917	57.3	592	58.9	112	56
Upper-income	2,869	29.3	2,535	29.5	259	25.8	75	37.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	9,786	100.0	8,581	100.0	1,005	100.0	200	100.0
Percentage of Total Businesses:				87.7		10.3		2.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	16	2	16	2.1	0	0	0	0
Middle-income	483	61.2	475	61.3	8	57.1	0	0
Upper-income	290	36.8	284	36.6	6	42.9	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	789	100.0	775	100.0	14	100.0	0	.0
Percentage of Total Farms:				98.2		1.8		.0

2017 FFIEC Census Data and 2017 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN OHIO

Lending Test

Croghan's performance under the lending test in this assessment area is reasonable. Croghan has excellent geographic distribution of loans, a moderate level of lending gaps, and a reasonable distribution among borrowers of different income levels and to businesses of different revenue sizes. Croghan also makes use of flexible lending practices in this assessment area. Croghan exhibits a reasonable record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, or businesses with gross annual revenues of \$1 million or less.

Borrower distribution received greater weight than geographic distribution based on the lower percentage of low- and moderate-income geographies within this assessment area. Greatest consideration was given to the evaluation of consumer loans (credit cards, home equity, motor vehicle and other-secured) based on the overall volume of loans followed by residential mortgage lending (home purchase and refinance) and small business lending. There were not enough home improvement loans originated in the evaluation period to conduct a meaningful analysis. In addition, Croghan's lending performance was compared to 2016 and 2017 aggregate performance of all lenders required to report HMDA data within the respective assessment areas. Details of the consumer, residential mortgage and small business lending and information regarding lending by peers is in Appendix B.

Borrower Distribution of Lending

Croghan's overall distribution among borrowers of different income levels and businesses of different sizes is reasonable. Borrower distribution is reasonable for consumer, HMDA, and small business lending.

Consumer Lending

There were 579 consumer loans originated for which 547 had a borrower income. Of those loans with reported income, 13.5% were to low-, 25.7% to moderate-, 25.9% to middle-, and 29.4% to upper-income borrowers. Consumer lending was compared to the income levels of households in the assessment area (proxy) for credit card, motor vehicle, and other-unsecured loans and to income levels of families in the assessment area (proxy) for home equity loans.

Credit Cards

Croghan's credit card lending to low-income borrowers was 24.0%, which was slightly above the proxy at 20.7%. Lending to moderate-income borrowers was 20.0% or above the 15.9% proxy. Croghan's lending to borrowers of middle-income was 9.3% and well below the proxy at 18.8%. Lastly, lending to upper-income borrowers at 8.0% was significantly below the proxy at 44.6%.

Croghan's credit card lending to low- and moderate-income borrowers was higher than the percentage of households (proxy) and is excellent.

Home Equity Lending

Croghan's home equity lending to low-income borrowers was 5.7%, which was well below the proxy of 17.5%. Within the assessment area, 17.5% of families are low-income and 10% of families are below poverty. This could affect the ability to lend to low-income borrowers. Lending to moderate-income borrowers was 18.4% or slightly above the proxy at 17.7%. Croghan's lending to borrowers of middle-income was 26.4% and slightly above the proxy at 21.8%. Lastly, lending to upper-income borrowers at 48.3% was slightly above proxy at 43.0%.

Croghan's home equity lending to low-income borrowers was lower than the percentage of families (proxy), but exceeded proxy for moderate-income borrowers and is excellent.

Motor Vehicle Lending

Croghan's motor vehicle lending to low-income borrowers was 12.0%, which was below the proxy at 20.7%. Within the assessment area, 20.7% of households are low-income and 12.3% of households are below poverty. This could affect the ability to lend to low-income borrowers. Lending to moderate-income borrowers was 30.5% or significantly above the proxy at 15.9%. Croghan's lending to borrowers of middle-income was 28.1% and above the proxy at 18.8%. Lastly, lending to upper-income borrowers at 28.8% was below proxy at 44.6%.

Croghan's motor vehicle lending to low-income borrowers was lower than the percentage of households (proxy), but exceeded proxy for moderate-income borrowers and is reasonable.

Other – Secured Lending

Croghan's other-secured lending to low-income borrowers was 11.3%, or below the proxy at 20.7%. Lending to moderate-income borrowers was 20.6% or above the proxy at 15.9%. Croghan's lending to borrowers of middle-income was 37.1% and significantly above the proxy at 18.8%. Lastly, lending to upper-income borrowers at 30.9% was below proxy at 44.6%.

Croghan's other-secured lending to low-income borrowers was lower than the percentage of households (proxy), but exceeded proxy for moderate-income borrowers and is reasonable.

HMDA Lending

Of the 503 HMDA loans made in the assessment area, 464 had a borrower income. Of those loans with income, 31 were to low-, 116 to moderate-, 114 to middle-, and 203 to upper-income borrowers. Croghan's performance was compared to the income of families in the assessment area (proxy). To evaluate Croghan's HMDA lending, loan activity is further analyzed by understanding the performance context of the assessment area. Within the assessment area,

17.5% of families are low-income and 10.0% of families are below poverty. This could affect the ability to lend to low-income borrowers. The average age of housing stock in the assessment area is 58 years, which could indicate the need for HMDA lending, although 23.0% of housing units are rentals, 17.2% are vacant and 8.1% are multi-family. This limits the ability to make HMDA loans.

Overall the borrower distribution for HMDA lending is reasonable.

Home Purchase Loans

In 2016, Croghan made 150 home purchase loans, of which 10.0% were to low-income borrowers, which was below proxy of 16.2% but significantly above the aggregate of 5.3%. Lending to moderate-income borrowers was at 21.3%, which was above both proxy of 17.2% and aggregate of 20.2%. Lending to middle-income borrowers was 21.3% and was slightly below proxy (21.8%) and peer (22.1%). Lending to upper-income borrowers was 42.7%, which was slightly below proxy of 44.8% and slightly above the aggregate at 36.4%.

In 2017, Croghan made 157 home purchase loans, of which only 3.8% were to low-income borrowers or significantly below the 21.8% proxy and below the aggregate of 5.3%. Lending to moderate-income borrowers was 28.0%, which was well above proxy (17.7%) and above the aggregate (22.5%). Lending to middle-income borrowers was 21.0% and was slightly below proxy (21.8%) and peer (22.0%). Lending to upper-income borrowers was 40.1%, which was slightly below proxy of 43.0% but slightly above the aggregate at 35.5%.

Croghan's distribution of borrowers at different income levels is reasonable for home purchase loans.

Refinance Loans

In 2016, Croghan made 78 refinance loans, of which 3.8% were to low-income borrowers or significantly below the proxy of 16.2% but only slightly below the aggregate at 4.9%. Lending to moderate-income borrowers was at 16.7%, which was slightly below proxy (17.2%) and slightly above the aggregate (14.20%). Lending to middle-income borrowers was 21.8% and was at proxy (21.8%) and slightly above the aggregate (19.9%). Lending to upper-income borrowers was 50.0%, which was slightly above proxy of 44.8% and the aggregate at 43.2%.

In 2017, Croghan made 43 refinance loans, of which only 2.3% were to low-income borrowers which was significantly below proxy of 17.5% and below the aggregate of 6.7%. Lending to moderate-income borrowers was at 30.2%, which was well above proxy at 17.7% and the aggregate at 17.3%. Lending to middle-income borrowers was 34.9% and was well above proxy at 21.8% and peer at 23.2%. Lending to upper-income borrowers was 27.9%, which was below proxy of 43.0% and the aggregate at 38.9%.

The distribution of refinance loans based on borrower income levels is reasonable.

Small Business Lending

Croghan's lending to businesses with revenue of \$1 million or less (35.9%) is below the percentage of such businesses in the assessment area (87.7 %), which is the proxy. Further analysis of small business lending shows 50.0% of Croghan's small business loans were for \$100,000 or less. Typically, the extent to which a bank is willing to grant loans of \$100,000 or less is reviewed because smaller businesses often have a greater need for small-dollar loans. The borrower distribution for small business lending is reasonable.

Geographic Distribution of Lending

Gaps in lending to different geographies within the assessment area are moderate. Croghan made loans in the majority of the tracts in 2016 and a substantial majority in 2017. There are no low-income tracts in this assessment area. While the percentage of gaps in moderate-income tracts was more than 50% in 2016, Croghan originated loans in 82% of the moderate-income tracts in 2017. The number of moderate income tracts increased from seven in 2016 to 11 in 2017. Croghan was able to serve the increased number of tracts; the bank only made loans in three of the moderate income tracts in 2016 but in nine moderate-income tracts in 2017. Further, the owner occupancy rates in the two moderate-income tracts without loans in 2017 was relatively low, which likely impacted the ability to make loans. This analysis is weighted toward performance in 2017 since more loan categories were included in the evaluation period for that year with only HMDA loans evaluated in 2016.

Overall, Croghan's distribution of lending among geographies is excellent.

Consumer Lending

Croghan originated 579 consumer loans in the assessment area during the evaluation period (last six months of 2017) comprised of 75 (13.0%) credit card, 87 (15.0%) home equity, 292 (50.4%) motor vehicle, 97 (16.8%) other-secured, and 28 (4.8%) other-unsecured loans. Of the 579 consumer loans, 57 were made in moderate-, 403 in middle-, and 119 in upper-income census tracts. Croghan's performance was compared to the number of households in the assessment area (proxy) for credit cards, motor vehicle, and other-secured loans, while number of families in the assessment area was used for home equity. There were not enough other-unsecured loans originated to include in the analysis.

Croghan was well below the proxy in moderate-income tracts for credit cards, was slightly above proxy for home equity loans, was slightly below for motor vehicle loans, and significantly below for other-secured loans. While lending was below the proxy in some categories, demographic factors may have impacted Croghan's ability to lend in moderate-income census tracts. Specifically, of the households residing in moderate-income tracts (14.3%), 28.4% are below the poverty level. Further, of the households below the poverty level in moderate-income tracts, 21.1% receive public assistance. Of the households that are families, 12.5% reside in moderate-income tracts and 30.3% of these families are below the poverty level. In addition, of the

households that rent in moderate-income tracts, 30.8% have rent costs greater than 30.0% of their income. The moderate-income tracts hold 13.4% of the population 16 years or older.

Overall Croghan's geographic distribution of consumer loans is excellent.

Credit Cards

Croghan originated 75 credit cards in the assessment area during the evaluation period. Credit card originations in moderate-income census tract were at 6.7%, which is well below the proxy of 14.3%. Credit card lending in middle-income tracts, at 61.3%, was slightly above proxy at 59.0%. In upper-income tracts, lending at 32% was also slightly above the proxy at 26.7%.

Croghan's geographic distribution of credit card loans is reasonable.

Home Equity Lending

Croghan originated 87 home equity loans in the assessment area during the evaluation period. Home equity lending in both moderate- and middle-income tracts was 11.5% and 71.3%, respectively and was slightly above the proxy of 10.4% and 59.1%, respectively. Home equity lending in upper-income tracts, at 17.2%, was below proxy at 30.6%.

Croghan's geographic distribution of home equity loans is excellent.

Motor Vehicle Lending

Croghan originated 292 motor vehicle loans in the assessment area during the review period. Motor vehicle lending in moderate-income census tracts was 12.0%, which was slightly below the proxy of 14.3%. Lending in middle-income census tracts, at 68.2%, was slightly above proxy at 59.0% and lending in upper-income census tracts for the institution was at 19.9%, which was well below proxy of 26.7%.

Croghan's geographic distribution of motor vehicle loans is excellent.

Other – Secured Lending

Croghan originated 97 other-secured loans in the assessment area during the evaluation period. Lending in moderate-income census tracts, at 3.1%, was significantly below the proxy of 14.3%. Other-secured loans in middle-income census tracts, at 76.3%, was above proxy at 59.0% and lending in upper-income census tracts for the institution was at 20.6%, which was slightly below proxy of 26.7%.

Croghan's geographic distribution of other-secured loans is reasonable.

HMDA Lending

During the evaluation period, Croghan originated 503 HMDA loans comprised of 307 home purchase (61.0%), 121 refinance (24.1%), 68 home improvement (13.5%), and seven multi-family (1.4%) loans. Croghan's performance was compared to the number of owner-occupied housing units in the assessment area (proxy) and the aggregate of all residential lenders (peer) in this market that are HMDA reporters. There were not enough home improvement and multi-family loans originated to include in the analysis.

Poverty levels, lack of affordability, and general economic conditions in the assessment area, which provide limited lending opportunities, were also considered as part of the evaluation. According to the 2010 Census Bureau (used for 2016 data), of the housing units in the assessment area, 49.8% were owner-occupied in moderate-income tracts, 35.7% were rentals, 14.5% were vacant, and 14.5% were multi-family. Of the households that are families, 14.9% are low-income and 11.6% are moderate-income families. Of the households that are families, 15.4% are below the poverty level. Further, of the households in the moderate-income census tracts, 17.1% receive public assistance. In addition, of those households that rent in moderate-income tracts, 16.6% have rent costs greater than 30.0% of their income. The moderate-income tracts hold 8.8% of the population 16 years or older. According to the 2015 ACS (used for 2017 data), of the housing units in the assessment area, 46.7% were owner-occupied in moderate-income tracts, 42.2% were rentals, 11.2% were vacant and 14.9% were multi-family. Of the households that are families, 25.9% are low-income and 15.5% are moderate-income families. Of the households that are families, 30.3% are below the poverty level, which is nearly double 2016 rates. Moreover, of the households in moderate-income tracts, 21.1% receive public assistance and, of those households that rent in moderate-income tracts, 30.8% have rent costs greater than 30.0% of their income. The moderate-income tracts hold 13.4% of the population 16 years or older. The demographics of the moderate-income census tracts do impact Croghan's ability to lend in these areas. Further, two universities are in the moderate-income tracts, which may impact Croghan's ability to make HMDA loans in moderate-income census tracts since these areas could be comprised of mostly college students with less of a need for home purchase, refinance, or home improvement loans.

Lending in the moderate-income tracts overall was slightly below proxy and overall exceeded peer; therefore, HMDA lending is excellent.

Home Purchase Loans

In 2016, Croghan made 150 home purchase loans, of which seven were in moderate-income census tracts. This represents 4.7% of home purchase loans, which was below the percentage of owner-occupied units in these tracts at 7.3%. The percentage of loans in moderate-income census tracts also was below the aggregate at 6.5%. Croghan made 98 home purchase loans in middle-income census tracts, which represents 65.3% and was slightly above proxy and peer. For upper-income census tracts, Croghan made 45 home purchase, which represents 30% and was slightly below both proxy and peer.

In 2017, Croghan made 157 home purchase loans with 19 in moderate-income census tracts. This represents 12.1% of home purchase loans, which was slightly above the percentage of owner-occupied units in these tracts at 10.4%. The percentage of loans in moderate-income census tracts was above the aggregate at 9.6%. The bank made 95 home purchase loans in middle-income census tracts, which represents 60.5% and was slightly above both proxy and peer. For upper-income census tracts, the bank made 43 home purchase loans, which represents 27.4% and was slightly below proxy and peer.

Croghan's geographic distribution overall for home purchase loans is excellent.

Refinance Loans

In 2016, Croghan made 78 refinance loans of which five were in moderate-income census tracts. This represents 6.4% of refinance loans, which is slightly below the percentage of owner-occupied units in these tracts at 7.3% and above the peer (5.0%). Croghan made 44 refinance loans in middle-income census tracts (56.4%), which was slightly below proxy at 59.7% and slightly above peer (55.3%). For upper-income census tracts, Croghan made 29 refinance loans or 37.2%, which is slightly above proxy at 33.0% and slightly below peer at 39.8%.

In 2017, Croghan made 43 refinance loans of which four were in moderate-income census tracts. This represents 9.3% of refinance loans, which is slightly below the percentage of owner-occupied units in these tracts at 10.4%, but above peer (8.1%). Croghan made 28 refinance loans in middle-income census tracts, which represents 65.1% and was slightly above proxy (59.1%) and peer (55.3%). For upper-income census tracts, the bank made 11 refinance loans, which represents 25.6% and is slightly below proxy (30.6%) and below peer (36.6%).

Croghan's geographic distribution overall for refinance loans is excellent.

Small Business Lending

Croghan originated 64 small business loans in the assessment area during the evaluation period (last six months of 2017) of which three were in moderate-income census tracts. This represents 4.7% of refinance loans, which is well below the percentage of businesses in these tracts (13.2%). The bank made 35 small business loans in middle-income census tracts, which represents 54.7%. This is slightly below proxy at 57.4%. For upper-income census tracts, the bank made 26 small business loans, which represents 40.6% and is above proxy of 29.3%.

The geographic distribution of small business lending is reasonable.

Community Development Test

Croghan is rated satisfactory under the Community Development Test. Croghan's community development performance demonstrates an adequate responsiveness to the community

development needs of the assessment areas through community development lending, qualified investments, and community development services, when considering the bank's capacity and the need and availability of such opportunities for community development in the assessment area.

Community Development Loans

Croghan made one community development loan totaling \$110,000 in this assessment area since the previous evaluation, which is very poor. This was a participation loan that supported economic development in downtown Tiffin, Ohio.

Community Development Investments

Croghan demonstrated an excellent responsiveness to the community development investment needs of the assessment area. Croghan has six investment bonds from a previous evaluation period with a current book value of \$2.1 million. These are municipal bonds for the City of Fremont and were used to construct schools in an area where more than 50% of students receive free or reduced lunch costs.

In addition, Croghan made qualified donations of \$62,200 to support organizations that provide community services targeted to low- and moderate-income individuals and provide economic development by providing support to small businesses. Large dollar donations included \$34,000 to the Sandusky County Economic Development Corporation and \$20,000 to the Norwalk Economic Development Corporation.

Community Development Services

Croghan demonstrated an adequate responsiveness to community development services. Bank officers and staff members provided financial expertise to the community by engaging in activities that promoted or facilitated affordable housing, services for low- and moderate-income individuals, and economic development. They provided approximately 1,339 hours to 17 different organizations in this assessment area. Examples of board and committee memberships held include chair, president, vice president, treasurer, trustee, and member.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
TOLEDO OHIO MSA #45780
(Limited-scope Evaluation)**

The Toledo Ohio MSA consists of the entirety of Lucas and Wood Counties. Of the 156 census tracts in the Toledo Ohio MSA, 36 are low (23.1%), 27 are moderate (17.3%), 56 are middle (35.9%), and 35 are upper-income (22.4%). Two tract's income is unknown.

Croghan operates one branch with an ATM in an upper-income census tract in the assessment area. This represents 5.9% of Croghan's total branches. Croghan also operates a loan production office in this assessment area in Maumee, Ohio, which is an upper income tract.

As of June 30, 2018, Croghan had \$23.2 million in deposits in this assessment area, representing a market share of 0.23%. Croghan is ranked 16th of 20 institutions in the Toledo Ohio MSA.

From July 1, 2017 through December 31, 2017, Croghan originated 89 consumer loans and 10 small business loans and from January 1, 2016 through December 31, 2017, Croghan originated 96 HMDA loans in the Toledo Ohio MSA. Based on Croghan's lending volume, a limited-scope review was conducted in this assessment area.

The following tables illustrates the demographics in the Toledo Ohio MSA.

Combined Demographics Report

Assessment Area(s): 2016 Toledo Ohio MSA #45780

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	27	17.3	13,612	9.6	5,839	42.9	31,626	22.3
Moderate-income	30	19.2	22,795	16.1	4,869	21.4	23,857	16.8
Middle-income	61	39.1	59,022	41.6	4,946	8.4	28,559	20.1
Upper-income	36	23.1	46,344	32.7	1,800	3.9	57,740	40.7
Unknown-income	2	1.3	9	0	9	100	0	0
Total Assessment Area	156	100.0	141,782	100.0	17,463	12.3	141,782	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	29,729	9,428	6.3	31.7	14,002	47.1	6,299	21.2
Moderate-income	50,186	20,988	14	41.8	21,748	43.3	7,450	14.8
Middle-income	106,331	66,721	44.5	62.7	29,809	28	9,801	9.2
Upper-income	69,199	52,928	35.3	76.5	11,902	17.2	4,369	6.3
Unknown-income	129	0	0	0	110	85.3	19	14.7
Total Assessment Area	255,574	150,065	100.0	58.7	77,571	30.4	27,938	10.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,423	6.9	1,206	6.6	211	9.2	6	3.3
Moderate-income	3,050	14.8	2,631	14.5	399	17.4	20	10.9
Middle-income	8,393	40.7	7,382	40.7	927	40.4	84	45.7
Upper-income	7,732	37.5	6,907	38.1	752	32.8	73	39.7
Unknown-income	21	0.1	17	0.1	3	0.1	1	0.5
Total Assessment Area	20,619	100.0	18,143	100.0	2,292	100.0	184	100.0
Percentage of Total Businesses:				88.0		11.1		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.5	1	0.3	1	9.1	0	0
Moderate-income	9	2.2	7	1.8	2	18.2	0	0
Middle-income	217	52.9	212	53.1	5	45.5	0	0
Upper-income	182	44.4	179	44.9	3	27.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	410	100.0	399	100.0	11	100.0	0	.0
Percentage of Total Farms:				97.3		2.7		.0

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area(s): 2017 Toledo Ohio MSA #45780

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	36	23.1	16,210	11.8	7,164	44.2	32,746	23.8
Moderate-income	27	17.3	20,300	14.8	4,814	23.7	22,538	16.4
Middle-income	56	35.9	55,186	40.1	6,063	11	26,557	19.3
Upper-income	35	22.4	45,818	33.3	1,926	4.2	55,676	40.5
Unknown-income	2	1.3	3	0	0	0	0	0
Total Assessment Area	156	100.0	137,517	100.0	19,967	14.5	137,517	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	40,897	10,549	7.4	25.8	20,968	51.3	9,380	22.9
Moderate-income	43,263	18,536	13.1	42.8	18,044	41.7	6,683	15.4
Middle-income	100,331	60,798	42.9	60.6	31,672	31.6	7,861	7.8
Upper-income	71,398	51,815	36.6	72.6	15,255	21.4	4,328	6.1
Unknown-income	106	0	0	0	73	68.9	33	31.1
Total Assessment Area	255,995	141,698	100.0	55.4	86,012	33.6	28,285	11.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,444	13.2	1,990	12.4	436	19	18	10.4
Moderate-income	2,032	11	1,735	10.9	286	12.4	11	6.4
Middle-income	6,668	36.1	5,864	36.7	734	31.9	70	40.5
Upper-income	7,293	39.5	6,379	39.9	841	36.6	73	42.2
Unknown-income	19	0.1	16	0.1	2	0.1	1	0.6
Total Assessment Area	18,456	100.0	15,984	100.0	2,299	100.0	173	100.0
Percentage of Total Businesses:			86.6		12.5		.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6	1.7	4	1.2	2	18.2	0	0
Moderate-income	6	1.7	3	0.9	3	27.3	0	0
Middle-income	195	55.6	191	56.2	4	36.4	0	0
Upper-income	144	41	142	41.8	2	18.2	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	351	100.0	340	100.0	11	100.0	0	.0
Percentage of Total Farms:			96.9		3.1		.0	

2017 FFIEC Census Data and 2017 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TOLEDO OHIO MSA #45780

The Toledo Ohio MSA's performance was evaluated using available data, including performance and demographic information and compared with Croghan's overall performance. To conduct meaningful analysis in this assessment area, all consumer products were combined and all HMDA products were combined. Please refer to the tables in Appendix B for information regarding this assessment area.

For the Lending Test, Croghan received a satisfactory rating in the Toledo Ohio MSA. Performance in this limited-scope area was consistent with Croghan's performance overall. Lending levels were excellent for geographic distribution of loans and reasonable for borrower distribution of loans in this area. Overall, gaps in lending were substantial. Croghan's penetration rate in the Toledo Ohio MSA was 21.8% in 2016 and 40.4% in 2017, with penetration low- and moderate-income tracts at 3.4% and 16.7% in 2016 and 13.9% and 33.3% in 2017. Croghan only operates one branch in the assessment area. Competition is present as the bank only has 0.23% of deposit market share.

For the Community Development Test, Croghan received a satisfactory rating. There was no community development lending activity in the Toledo Ohio MSA, which is considered very poor. Croghan made one investment and various donations, which is excellent. In addition, a few community development services were provided, which is adequate.

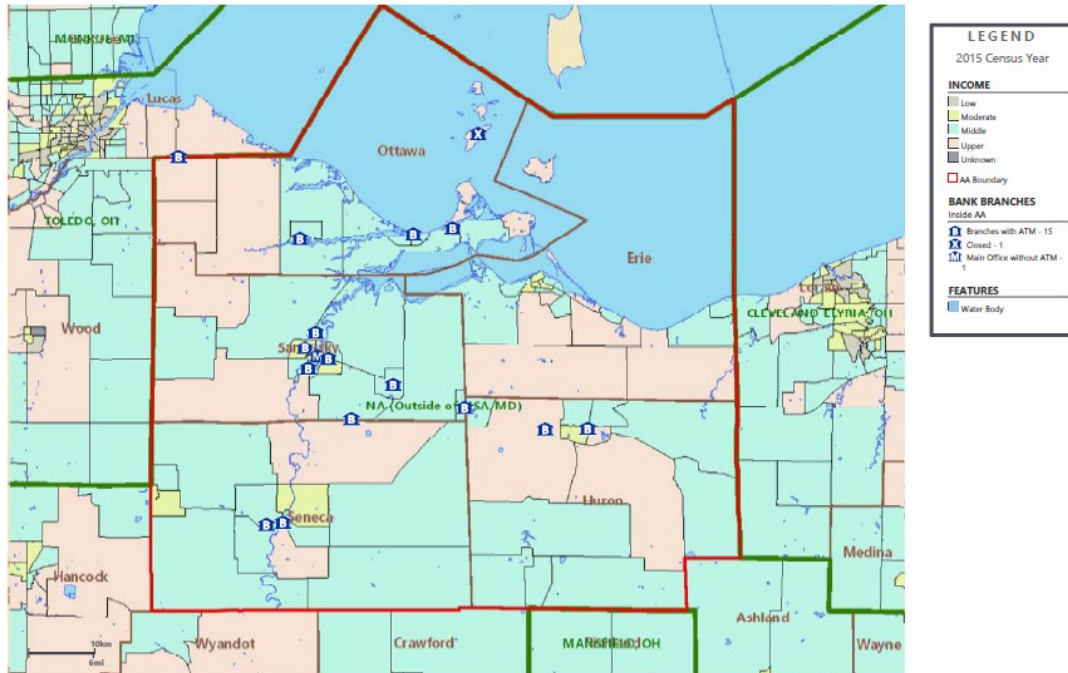
The Toledo Ohio MSA has 36 low- (23.1% of total tracts) and 27 moderate-income census tracts (17.3% of total tracts). In the assessment area, 33.6% of the housing units are rentals, 11.1% are vacant, and 16.9% are multi-family. The percentage of households below the poverty level in the Toledo Ohio MSA (18.9%) is higher than the state (15.0%) and the percentage of families below the poverty level in the Toledo Ohio MSA (14.5%) is also higher than the state (11.5%). The unemployment rate in the Toledo Ohio MSA is 20.6% in low- and 15.0% in moderate-income census tracts. These statistics, in addition to limited market share and branch presence, can limit opportunities to originate consumer and residential mortgage loans in the Toledo Ohio MSA.

Performance in the Toledo Ohio MSA did not result in a change to the overall rating.

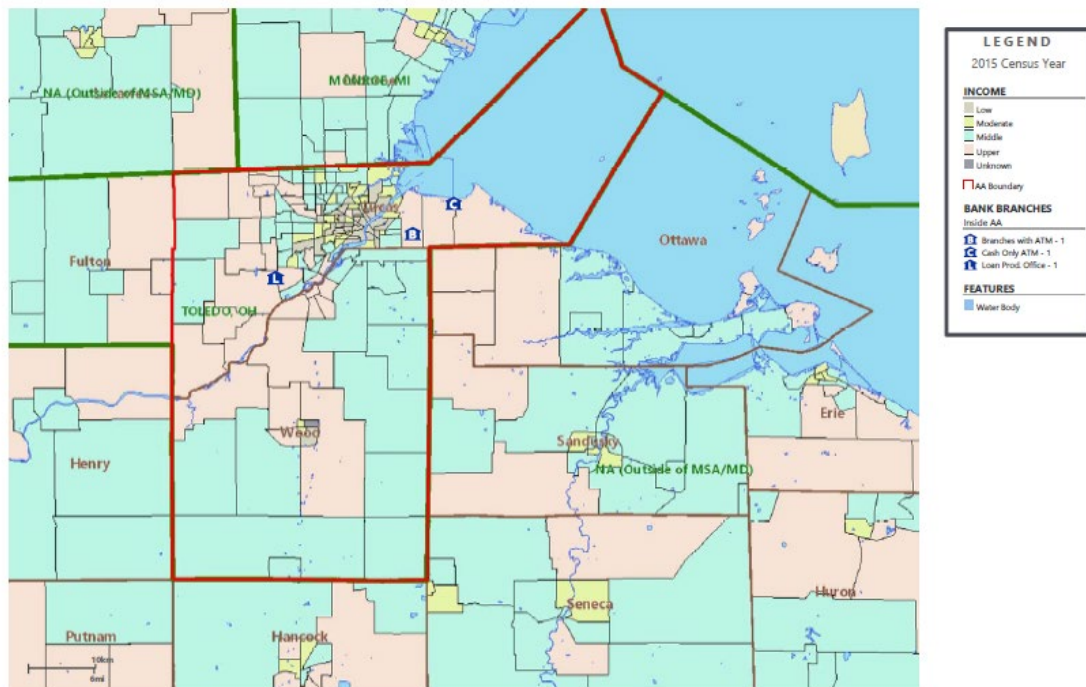
APPENDIX A

ASSESSMENT AREA MAPS

Assessment Area: Nonmetropolitan Ohio



Assessment Area: Toledo Ohio MSA #45780



APPENDIX B
LENDING TABLES
Consumer Loan Distribution Table

Exam: Croghan - 2019

Assessment Area/Group :2017 Non Metropolitan Ohio

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Credit Card							
Low	0	0.0%	0	0.0%	18	24.0%	25	10.4%
Moderate	5	6.7%	7	2.9%	15	20.0%	56	23.8%
Low/Moderate Total	5	6.7%	7	2.9%	33	44.0%	81	34.3%
Middle	46	61.3%	148	62.7%	7	9.3%	29	12.3%
Upper	24	32.0%	81	34.4%	6	8.0%	51	21.3%
Unknown	0	0.0%	0	0.0%	29	38.7%	76	32.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	75	100.0%	237	100.0%	75	100.0%	237	100.0%
	Home Equity							
Low	0	0.0%	0	0.0%	5	5.7%	142	3.9%
Moderate	10	11.5%	426	11.6%	16	18.4%	437	11.9%
Low/Moderate Total	10	11.5%	426	11.6%	21	24.1%	579	15.8%
Middle	62	71.3%	2,630	71.8%	23	26.4%	842	23.0%
Upper	15	17.2%	606	16.6%	42	48.3%	2,195	60.0%
Unknown	0	0.0%	0	0.0%	1	1.1%	45	1.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	87	100.0%	3,661	100.0%	87	100.0%	3,661	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	35	12.0%	438	8.2%
Moderate	35	12.0%	645	12.1%	89	30.5%	1,485	27.9%
Low/Moderate Total	35	12.0%	645	12.1%	124	42.5%	1,922	36.2%
Middle	199	68.2%	3,661	68.9%	82	28.1%	1,533	28.8%
Upper	58	19.9%	1,009	19.0%	84	28.8%	1,813	34.1%
Unknown	0	0.0%	0	0.0%	2	0.7%	46	0.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	292	100.0%	5,315	100.0%	292	100.0%	5,315	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	11	11.3%	97	3.5%
Moderate	3	3.1%	50	1.8%	20	20.6%	270	9.8%
Low/Moderate Total	3	3.1%	50	1.8%	31	32.0%	368	13.3%
Middle	74	76.3%	1,914	69.3%	36	37.1%	843	30.5%
Upper	20	20.6%	798	28.9%	30	30.9%	1,552	56.2%
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	97	100.0%	2,762	100.0%	97	100.0%	2,762	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	9	32.1%	25	31.0%
Moderate	4	14.3%	11	13.8%	9	32.1%	28	34.5%
Low/Moderate Total	4	14.3%	11	13.8%	18	64.3%	54	65.5%
Middle	22	78.6%	62	75.9%	2	7.1%	11	12.9%
Upper	2	7.1%	9	10.4%	8	28.6%	18	21.6%
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	28	100.0%	82	100.0%	28	100.0%	82	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	78	13.5%	727	6.0%
Moderate	57	9.8%	1,139	9.4%	149	25.7%	2,277	18.9%
Low/Moderate Total	57	9.8%	1,139	9.4%	227	39.2%	3,004	24.9%
Middle	403	69.6%	8,415	69.8%	150	25.9%	3,257	27.0%
Upper	119	20.6%	2,503	20.8%	170	29.4%	5,629	46.7%
Unknown	0	0.0%	0	0.0%	32	5.5%	167	1.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	579	100.0%	12,057	100.0%	579	100.0%	12,057	100.0%

Consumer Loan Distribution Table

Exam: Croghan - 2019

Assessment Area/Group :2017 Toledo Ohio MSA #45780

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Credit Card							
Low	0	0.0%	0	0.0%	2	20.0%	5	19.4%
Moderate	0	0.0%	0	0.0%	1	10.0%	1	3.7%
Low/Moderate Total	0	0.0%	0	0.0%	3	30.0%	6	23.1%
Middle	4	40.0%	10	36.6%	1	10.0%	0	1.1%
Upper	6	60.0%	17	63.4%	4	40.0%	17	61.6%
Unknown	0	0.0%	0	0.0%	2	20.0%	4	14.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	27	100.0%	10	100.0%	27	100.0%
	Home Equity							
Low	0	0.0%	0	0.0%	1	20.0%	37	18.6%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	20.0%	37	18.6%
Middle	1	20.0%	37	18.6%	1	20.0%	29	14.4%
Upper	4	80.0%	162	81.4%	3	60.0%	133	67.0%
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	5	100.0%	199	100.0%	5	100.0%	199	100.0%
	Motor Vehicle							
Low	1	2.6%	10	1.4%	6	15.8%	94	13.1%
Moderate	5	13.2%	70	9.7%	12	31.6%	221	30.7%
Low/Moderate Total	6	15.8%	80	11.1%	18	47.4%	315	43.7%
Middle	23	60.5%	459	63.8%	5	13.2%	73	10.1%
Upper	9	23.7%	180	25.1%	14	36.8%	316	43.9%
Unknown	0	0.0%	0	0.0%	1	2.6%	17	2.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	719	100.0%	38	100.0%	719	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	4	11.1%	37	3.9%
Moderate	3	8.3%	62	6.5%	5	13.9%	78	8.0%
Low/Moderate Total	3	8.3%	62	6.5%	9	25.0%	115	11.9%
Middle	15	41.7%	351	36.3%	10	27.8%	245	25.4%
Upper	18	50.0%	552	57.2%	17	47.2%	605	62.7%
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	36	100.0%	965	100.0%	36	100.0%	965	100.0%
	Other - Unsecured							
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%
	Consumer Loan Totals							
Low	1	1.1%	10	0.5%	13	14.6%	174	9.1%
Moderate	8	9.0%	132	6.9%	18	20.2%	299	15.7%
Low/Moderate Total	9	10.1%	142	7.4%	31	34.8%	473	24.8%
Middle	43	48.3%	857	44.9%	17	19.1%	346	18.1%
Upper	37	41.6%	911	47.7%	38	42.7%	1,070	56.0%
Unknown	0	0.0%	0	0.0%	3	3.4%	20	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	89	100.0%	1,910	100.0%	89	100.0%	1,910	100.0%

HMDA Loan Distribution Table

Exam: Croghan - 2019

Assessment Area/Group :2016 Non Metropolitan Ohio

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	15	10.0%	830	4.5%
Moderate	7	4.7%	349	1.9%	32	21.3%	2,817	15.4%
Low/Moderate Total	7	4.7%	349	1.9%	47	31.3%	3,647	19.9%
Middle	98	65.3%	10,481	57.3%	32	21.3%	3,354	18.3%
Upper	45	30.0%	7,461	40.8%	64	42.7%	10,512	57.5%
Unknown	0	0.0%	0	0.0%	7	4.7%	778	4.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	150	100.0%	18,291	100.0%	150	100.0%	18,291	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	3	3.8%	200	2.0%
Moderate	5	6.4%	298	3.0%	13	16.7%	1,094	11.1%
Low/Moderate Total	5	6.4%	298	3.0%	16	20.5%	1,294	13.2%
Middle	44	56.4%	4,712	48.0%	17	21.8%	1,477	15.0%
Upper	29	37.2%	4,805	49.0%	39	50.0%	5,419	55.2%
Unknown	0	0.0%	0	0.0%	6	7.7%	1,625	16.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	9,815	100.0%	78	100.0%	9,815	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	2	5.7%	13	1.6%
Moderate	2	5.7%	63	7.6%	6	17.1%	82	9.8%
Low/Moderate Total	2	5.7%	63	7.6%	8	22.9%	95	11.4%
Middle	24	68.6%	386	46.3%	10	28.6%	113	13.6%
Upper	9	25.7%	384	46.1%	15	42.9%	546	65.5%
Unknown	0	0.0%	0	0.0%	2	5.7%	79	9.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	35	100.0%	833	100.0%	35	100.0%	833	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	20.0%	415	9.9%	0	0.0%	0	0.0%
Low/Moderate Total	1	20.0%	415	9.9%	0	0.0%	0	0.0%
Middle	2	40.0%	2,483	59.5%	0	0.0%	0	0.0%
Upper	2	40.0%	1,275	30.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	5	100.0%	4,173	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	4,173	100.0%	5	100.0%	4,173	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	20	7.5%	1,043	3.1%
Moderate	15	5.6%	1,125	3.4%	51	19.0%	3,993	12.1%
Low/Moderate Total	15	5.6%	1,125	3.4%	71	26.5%	5,036	15.2%
Middle	168	62.7%	18,062	54.5%	59	22.0%	4,944	14.9%
Upper	85	31.7%	13,925	42.1%	118	44.0%	16,477	49.8%
Unknown	0	0.0%	0	0.0%	20	7.5%	6,655	20.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	268	100.0%	33,112	100.0%	268	100.0%	33,112	100.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Restricted-FR

Exam: Croghan - 2019

Assessment Area/Group :2017 Non Metropolitan Ohio

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	6	3.8%	353	1.9%
Moderate		12.1%	1,641	8.7%	44	28.0%	3,721	19.7%
Low/Moderate Total	19	12.1%	1,641	8.7%	50	31.8%	4,074	21.6%
Middle	95	60.5%	10,416	55.2%	33	21.0%	3,488	18.5%
Upper	43	27.4%	6,818	36.1%	63	40.1%	9,302	49.3%
Unknown	0	0.0%	0	0.0%	11	7.0%	2,011	10.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	157	100.0%	18,875	100.0%	157	100.0%	18,875	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	1	2.3%	27	0.7%
Moderate	4	9.3%	346	8.5%	13	30.2%	824	20.2%
Low/Moderate Total	4	9.3%	346	8.5%	14	32.6%	851	20.9%
Middle	28	65.1%	2,287	56.1%	15	34.9%	1,379	33.8%
Upper	11	25.6%	1,443	35.4%	12	27.9%	1,675	41.1%
Unknown	0	0.0%	0	0.0%	2	4.7%	171	4.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	43	100.0%	4,076	100.0%	43	100.0%	4,076	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	4	12.1%	16	0.8%
Moderate	6	18.2%	170	8.4%	8	24.2%	159	7.9%
Low/Moderate Total	6	18.2%	170	8.4%	12	36.4%	175	8.7%
Middle	17	51.5%	879	43.5%	7	21.2%	217	10.7%
Upper	10	30.3%	974	48.1%	10	30.3%	1,512	74.7%
Unknown	0	0.0%	0	0.0%	4	12.1%	119	5.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	33	100.0%	2,023	100.0%	33	100.0%	2,023	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	270	84.4%	0	0.0%	0	0.0%
Low/Moderate Total	1	50.0%	270	84.4%	0	0.0%	0	0.0%
Middle	1	50.0%	50	15.6%	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%	2	100.0%	320	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	320	100.0%	2	100.0%	320	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	11	4.7%	396	1.6%
Moderate	30	12.8%	2,427	9.6%	65	27.7%	4,704	18.6%
Low/Moderate Total	30	12.8%	2,427	9.6%	76	32.3%	5,100	20.2%
Middle	141	60.0%	13,632	53.9%	55	23.4%	5,084	20.1%
Upper	64	27.2%	9,235	36.5%	85	36.2%	12,489	49.4%
Unknown	0	0.0%	0	0.0%	19	8.1%	2,621	10.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	235	100.0%	25,294	100.0%	235	100.0%	25,294	100.0%

*Information based on 2015 ACS data

Peer Group HMDA Loan Distribution Table

Exam ID: Croghan - 2019

Selected Year: 2016

2016 Non Metropolitan Ohio

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	190	5.26%	12,635	2.68%
Moderate	235	6.5%	17,761	3.77%	732	20.25%	65,583	13.92%
<i>Low/Moderate Total</i>	<i>235</i>	<i>6.5%</i>	<i>17,761</i>	<i>3.77%</i>	<i>922</i>	<i>25.5%</i>	<i>78,218</i>	<i>16.6%</i>
Middle	1,975	54.63%	231,093	49.05%	798	22.07%	91,898	19.51%
Upper	1,405	38.87%	222,292	47.18%	1,316	36.4%	238,282	50.57%
Unknown	0	0.0%	0	0.0%	579	16.02%	62,748	13.32%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,615	100.0%	471,146	100.0%	3,615	100.0%	471,146	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	112	4.87%	7,116	2.39%
Moderate	114	4.95%	8,114	2.73%	328	14.25%	28,170	9.46%
<i>Low/Moderate Total</i>	<i>114</i>	<i>4.95%</i>	<i>8,114</i>	<i>2.73%</i>	<i>440</i>	<i>19.11%</i>	<i>35,286</i>	<i>11.86%</i>
Middle	1,272	55.26%	149,539	50.24%	459	19.94%	47,394	15.92%
Upper	916	39.79%	139,983	47.03%	994	43.18%	155,096	52.11%
Unknown	0	0.0%	0	0.0%	409	17.77%	59,860	20.11%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,302	100.0%	297,636	100.0%	2,302	100.0%	297,636	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	31	6.87%	779	2.65%
Moderate	28	6.21%	673	2.29%	70	15.52%	2,198	7.48%
<i>Low/Moderate Total</i>	<i>28</i>	<i>6.21%</i>	<i>673</i>	<i>2.29%</i>	<i>101</i>	<i>22.39%</i>	<i>2,977</i>	<i>10.13%</i>
Middle	235	52.11%	13,402	45.63%	114	25.28%	6,032	20.54%
Upper	188	41.69%	15,299	52.08%	212	47.01%	18,975	64.6%
Unknown	0	0.0%	0	0.0%	24	5.32%	1,390	4.73%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	451	100.0%	29,374	100.0%	451	100.0%	29,374	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	14.29%	765	4.12%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>2</i>	<i>14.29%</i>	<i>765</i>	<i>4.12%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	8	57.14%	15,563	83.84%	0	0.0%	0	0.0%
Upper	4	28.57%	2,235	12.04%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	14	100.0%	18,563	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	18,563	100.0%	14	100.0%	18,563	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	333	5.22%	20,530	2.51%
Moderate	379	5.94%	27,313	3.34%	1,130	17.71%	95,951	11.75%
<i>Low/Moderate Total</i>	<i>379</i>	<i>5.94%</i>	<i>27,313</i>	<i>3.34%</i>	<i>1,463</i>	<i>22.92%</i>	<i>116,481</i>	<i>14.26%</i>
Middle	3,490	54.69%	409,597	50.15%	1,371	21.48%	145,324	17.79%
Upper	2,513	39.38%	379,809	46.5%	2,522	39.52%	412,353	50.49%
Unknown	0	0.0%	0	0.0%	1,026	16.08%	142,561	17.46%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6,382	100.0%	816,719	100.0%	6,382	100.0%	816,719	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Croghan - 2019

Selected Year: 2017

2017 Non Metropolitan Ohio

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	195	5.33%	13,303	2.72%
Moderate	350	9.56%	30,728	6.27%	823	22.48%	76,333	15.58%
<i>Low/Moderate Total</i>	<i>350</i>	<i>9.56%</i>	<i>30,728</i>	<i>6.27%</i>	<i>1,018</i>	<i>27.81%</i>	<i>89,636</i>	<i>18.29%</i>
Middle	2,070	56.54%	250,392	51.1%	804	21.96%	96,465	19.69%
Upper	1,241	33.9%	208,860	42.63%	1,299	35.48%	243,397	49.67%
Unknown	0	0.0%	0	0.0%	540	14.75%	60,482	12.34%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,661	100.0%	489,980	100.0%	3,661	100.0%	489,980	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	118	6.67%	7,634	3.52%
Moderate	143	8.08%	13,820	6.37%	306	17.3%	25,970	11.97%
<i>Low/Moderate Total</i>	<i>143</i>	<i>8.08%</i>	<i>13,820</i>	<i>6.37%</i>	<i>424</i>	<i>23.97%</i>	<i>33,604</i>	<i>15.49%</i>
Middle	978	55.29%	109,728	50.59%	410	23.18%	44,180	20.37%
Upper	648	36.63%	93,334	43.03%	688	38.89%	105,430	48.61%
Unknown	0	0.0%	0	0.0%	247	13.96%	33,668	15.52%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,769	100.0%	216,882	100.0%	1,769	100.0%	216,882	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	30	6.41%	643	2.56%
Moderate	44	9.4%	1,887	7.5%	98	20.94%	2,713	10.79%
<i>Low/Moderate Total</i>	<i>44</i>	<i>9.4%</i>	<i>1,887</i>	<i>7.5%</i>	<i>128</i>	<i>27.35%</i>	<i>3,356</i>	<i>13.34%</i>
Middle	246	52.56%	12,386	49.24%	125	26.71%	6,253	24.86%
Upper	178	38.03%	10,879	43.25%	190	40.6%	14,767	58.71%
Unknown	0	0.0%	0	0.0%	25	5.34%	776	3.09%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	468	100.0%	25,152	100.0%	468	100.0%	25,152	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	10	52.63%	5,849	40.13%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>10</i>	<i>52.63%</i>	<i>5,849</i>	<i>40.13%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	8	42.11%	8,527	58.5%	0	0.0%	0	0.0%
Upper	1	5.26%	200	1.37%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	19	100.0%	14,576	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	14,576	100.0%	19	100.0%	14,576	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	343	5.8%	21,580	2.89%
Moderate	547	9.24%	52,284	7.0%	1,227	20.74%	105,016	14.07%
<i>Low/Moderate Total</i>	<i>547</i>	<i>9.24%</i>	<i>52,284</i>	<i>7.0%</i>	<i>1,570</i>	<i>26.53%</i>	<i>126,596</i>	<i>16.96%</i>
Middle	3,302	55.81%	381,033	51.04%	1,339	22.63%	146,898	19.68%
Upper	2,068	34.95%	313,273	41.96%	2,177	36.79%	363,594	48.7%
Unknown	0	0.0%	0	0.0%	831	14.04%	109,502	14.67%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5,917	100.0%	746,590	100.0%	5,917	100.0%	746,590	100.0%

HMDA Loan Distribution Table

Exam: Croghan - 2019

Assessment Area/Group :2016 Toledo Ohio MSA #45780

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	1	3.0%	19	0.4%
Moderate	6	18.2%	656	15.3%	6	18.2%	315	7.3%
Low/Moderate Total	6	18.2%	656	15.3%	7	21.2%	334	7.8%
Middle	19	57.6%	1,949	45.3%	2	6.1%	135	3.1%
Upper	8	24.2%	1,693	39.4%	8	24.2%	1,684	39.2%
Unknown	0	0.0%	0	0.0%	16	48.5%	2,145	49.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	33	100.0%	4,298	100.0%	33	100.0%	4,298	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	12.5%	187	15.5%	1	12.5%	80	6.6%
Low/Moderate Total	1	12.5%	187	15.5%	1	12.5%	80	6.6%
Middle	3	37.5%	246	20.3%	2	25.0%	232	19.2%
Upper	4	50.0%	776	64.2%	4	50.0%	710	58.7%
Unknown	0	0.0%	0	0.0%	1	12.5%	187	15.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	1,209	100.0%	8	100.0%	1,209	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	577	99.0%	0	0.0%	0	0.0%
Low/Moderate Total	1	50.0%	577	99.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	50.0%	6	1.0%	1	50.0%	6	1.0%
Unknown	0	0.0%	0	0.0%	1	50.0%	577	99.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	583	100.0%	2	100.0%	583	100.0%
	Multi-Family							
Low	1	10.0%	175	0.9%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	1	10.0%	175	0.9%	0	0.0%	0	0.0%
Middle	8	80.0%	18,717	97.4%	0	0.0%	0	0.0%
Upper	1	10.0%	317	1.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	10	100.0%	19,209	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	19,209	100.0%	10	100.0%	19,209	100.0%
	HMDA Totals							
Low	1	1.9%	175	0.7%	1	1.9%	19	0.1%
Moderate	8	15.1%	1,420	5.6%	7	13.2%	395	1.6%
Low/Moderate Total	9	17.0%	1,595	6.3%	8	15.1%	414	1.6%
Middle	30	56.6%	20,912	82.7%	4	7.5%	367	1.5%
Upper	14	26.4%	2,792	11.0%	13	24.5%	2,400	9.5%
Unknown	0	0.0%	0	0.0%	28	52.8%	22,118	87.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	53	100.0%	25,299	100.0%	53	100.0%	25,299	100.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: Croghan - 2019

Assessment Area/Group :2017 Toledo Ohio MSA #45780

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	1	3.6%	235	5.3%	0	0.0%	0	0.0%
Moderate	3	10.7%	355	8.0%	9	32.1%	437	9.8%
Low/Moderate Total	4	14.3%	590	13.3%	9	32.1%	437	9.8%
Middle	20	71.4%	3,251	73.2%	4	14.3%	226	5.1%
Upper	4	14.3%	598	13.5%	6	21.4%	1,021	23.0%
Unknown	0	0.0%	0	0.0%	9	32.1%	2,755	62.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	4,439	100.0%	28	100.0%	4,439	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	14.3%	310	29.8%	1	14.3%	106	10.2%
Low/Moderate Total	1	14.3%	310	29.8%	1	14.3%	106	10.2%
Middle	2	28.6%	125	12.0%	0	0.0%	0	0.0%
Upper	4	57.1%	605	58.2%	5	71.4%	624	60.0%
Unknown	0	0.0%	0	0.0%	1	14.3%	310	29.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	1,040	100.0%	7	100.0%	1,040	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	20.0%	5	6.7%
Moderate	1	20.0%	6	8.0%	2	40.0%	34	45.3%
Low/Moderate Total	1	20.0%	6	8.0%	3	60.0%	39	52.0%
Middle	1	20.0%	30	40.0%	2	40.0%	36	48.0%
Upper	3	60.0%	39	52.0%	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	5	100.0%	75	100.0%	5	100.0%	75	100.0%
Multi-Family								
Low	3	100.0%	4,785	100.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	3	100.0%	4,785	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%	3	100.0%	4,785	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	4,785	100.0%	3	100.0%	4,785	100.0%
HMDA Totals								
Low	4	9.3%	5,020	48.6%	1	2.3%	5	0.0%
Moderate	5	11.6%	671	6.5%	12	27.9%	577	5.6%
Low/Moderate Total	9	20.9%	5,691	55.0%	13	30.2%	582	5.6%
Middle	23	53.5%	3,406	32.9%	6	14.0%	262	2.5%
Upper	11	25.6%	1,242	12.0%	11	25.6%	1,645	15.9%
Unknown	0	0.0%	0	0.0%	13	30.2%	7,850	75.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	43	100.0%	10,339	100.0%	43	100.0%	10,339	100.0%

*Information based on 2015 ACS data

Peer Group HMDA Loan Distribution Table

Exam ID: Croghan - 2019

Selected Year: 2016

2016 Toledo Ohio MSA #45780

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	86	1.06%	6,884	0.6%	616	7.63%	43,329	3.77%
Moderate	590	7.3%	46,552	4.05%	1,634	20.23%	153,977	13.4%
<i>Low/Moderate Total</i>	<i>676</i>	<i>8.37%</i>	<i>53,436</i>	<i>4.63%</i>	<i>2,250</i>	<i>27.86%</i>	<i>197,306</i>	<i>17.17%</i>
Middle	3,684	45.61%	402,388	35.01%	1,990	24.64%	251,360	21.87%
Upper	3,717	46.02%	693,627	60.34%	2,839	35.15%	570,061	49.59%
Unknown	0	0.0%	0	0.0%	998	12.36%	130,724	11.37%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8,077	100.0%	1,149,451	100.0%	8,077	100.0%	1,149,451	100.0%
	Refinance							
Low	53	1.11%	3,607	0.54%	268	5.62%	18,973	2.85%
Moderate	337	7.06%	26,375	3.97%	576	12.07%	50,859	7.65%
<i>Low/Moderate Total</i>	<i>390</i>	<i>8.17%</i>	<i>29,982</i>	<i>4.51%</i>	<i>844</i>	<i>17.69%</i>	<i>69,832</i>	<i>10.51%</i>
Middle	1,911	40.05%	206,338	31.05%	952	19.95%	103,816	15.62%
Upper	2,471	51.78%	428,283	64.44%	2,183	45.75%	379,765	57.14%
Unknown	0	0.0%	0	0.0%	793	16.62%	111,190	16.73%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4,772	100.0%	664,603	100.0%	4,772	100.0%	664,603	100.0%
	Home Improvement							
Low	38	4.78%	423	1.02%	91	11.45%	1,943	4.7%
Moderate	98	12.33%	2,316	5.6%	160	20.13%	3,971	9.6%
<i>Low/Moderate Total</i>	<i>136</i>	<i>17.11%</i>	<i>2,739</i>	<i>6.62%</i>	<i>251</i>	<i>31.57%</i>	<i>5,914</i>	<i>14.3%</i>
Middle	359	45.16%	14,653	35.44%	211	26.54%	7,986	19.31%
Upper	300	37.74%	23,959	57.94%	301	37.86%	24,487	59.22%
Unknown	0	0.0%	0	0.0%	32	4.03%	2,964	7.17%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	795	100.0%	41,351	100.0%	795	100.0%	41,351	100.0%
	Multi-Family							
Low	11	11.0%	25,476	19.1%	0	0.0%	0	0.0%
Moderate	27	27.0%	17,213	12.9%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>38</i>	<i>38.0%</i>	<i>42,689</i>	<i>32.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	43	43.0%	65,040	48.75%	0	0.0%	0	0.0%
Upper	19	19.0%	25,687	19.25%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	100	100.0%	133,416	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	100	100.0%	133,416	100.0%	100	100.0%	133,416	100.0%
	HMDA Totals							
Low	188	1.37%	36,390	1.83%	975	7.09%	64,245	3.23%
Moderate	1,052	7.65%	92,456	4.65%	2,370	17.24%	208,807	10.5%
<i>Low/Moderate Total</i>	<i>1,240</i>	<i>9.02%</i>	<i>128,846</i>	<i>6.48%</i>	<i>3,345</i>	<i>24.34%</i>	<i>273,052</i>	<i>13.73%</i>
Middle	5,997	43.63%	688,419	34.61%	3,153	22.94%	363,162	18.26%
Upper	6,507	47.34%	1,171,556	58.91%	5,323	38.73%	974,313	48.99%
Unknown	0	0.0%	0	0.0%	1,923	13.99%	378,294	19.02%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13,744	100.0%	1,988,821	100.0%	13,744	100.0%	1,988,821	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Croghan - 2019

Selected Year: 2017

2017 Toledo Ohio MSA #45780

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	202	2.39%	15,786	1.28%	579	6.84%	40,607	3.3%
Moderate	738	8.72%	62,314	5.06%	1,770	20.91%	170,789	13.88%
<i>Low/Moderate Total</i>	<i>940</i>	<i>11.11%</i>	<i>78,100</i>	<i>6.33%</i>	<i>2,349</i>	<i>27.75%</i>	<i>211,396</i>	<i>17.18%</i>
Middle	3,775	44.6%	418,971	34.05%	1,893	22.37%	244,527	19.87%
Upper	3,749	44.29%	733,429	59.6%	3,142	37.12%	637,052	51.77%
Unknown	0	0.0%	0	0.0%	1,080	12.76%	137,525	11.18%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8,464	100.0%	1,230,500	100.0%	8,464	100.0%	1,230,500	100.0%
	Refinance							
Low	77	2.22%	6,004	1.3%	226	6.53%	15,037	3.25%
Moderate	304	8.78%	25,990	5.62%	515	14.88%	46,057	9.97%
<i>Low/Moderate Total</i>	<i>381</i>	<i>11.01%</i>	<i>31,994</i>	<i>6.92%</i>	<i>741</i>	<i>21.4%</i>	<i>61,094</i>	<i>13.22%</i>
Middle	1,427	41.22%	149,993	32.46%	736	21.26%	80,422	17.4%
Upper	1,654	47.78%	280,127	60.62%	1,446	41.77%	243,119	52.61%
Unknown	0	0.0%	0	0.0%	539	15.57%	77,479	16.77%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,462	100.0%	462,114	100.0%	3,462	100.0%	462,114	100.0%
	Home Improvement							
Low	72	8.52%	1,273	3.08%	86	10.18%	1,513	3.66%
Moderate	109	12.9%	2,243	5.42%	192	22.72%	5,319	12.86%
<i>Low/Moderate Total</i>	<i>181</i>	<i>21.42%</i>	<i>3,516</i>	<i>8.5%</i>	<i>278</i>	<i>32.9%</i>	<i>6,832</i>	<i>16.52%</i>
Middle	359	42.49%	16,163	39.07%	207	24.5%	9,330	22.56%
Upper	305	36.09%	21,686	52.43%	330	39.05%	23,407	56.59%
Unknown	0	0.0%	0	0.0%	30	3.55%	1,796	4.34%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	845	100.0%	41,365	100.0%	845	100.0%	41,365	100.0%
	Multi-Family							
Low	24	26.37%	47,504	21.89%	0	0.0%	0	0.0%
Moderate	21	23.08%	26,011	11.99%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>45</i>	<i>49.45%</i>	<i>73,515</i>	<i>33.88%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	34	37.36%	87,387	40.28%	0	0.0%	0	0.0%
Upper	12	13.19%	56,073	25.84%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	91	100.0%	216,975	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	91	100.0%	216,975	100.0%	91	100.0%	216,975	100.0%
	HMDA Totals							
Low	375	2.92%	70,567	3.62%	891	6.93%	57,157	2.93%
Moderate	1,172	9.11%	116,558	5.97%	2,477	19.26%	222,165	11.39%
<i>Low/Moderate Total</i>	<i>1,547</i>	<i>12.03%</i>	<i>187,125</i>	<i>9.59%</i>	<i>3,368</i>	<i>26.19%</i>	<i>279,322</i>	<i>14.32%</i>
Middle	5,595	43.5%	672,514	34.47%	2,836	22.05%	334,279	17.13%
Upper	5,720	44.47%	1,091,315	55.94%	4,918	38.24%	903,578	46.31%
Unknown	0	0.0%	0	0.0%	1,740	13.53%	433,775	22.23%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12,862	100.0%	1,950,954	100.0%	12,862	100.0%	1,950,954	100.0%

CRA Loan Distribution Table

Exam: Croghan - 2019

Assessment Area/Group: 2017 Non Metropolitan Ohio

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	4.7%	786	7.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	3	4.7%	786	7.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	35	54.7%	7,060	65.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	26	40.6%	2,955	27.4%	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%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	64	100.0%	10,801	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	23	35.9%	3,478	32.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	16	25.0%	3,495	32.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	25	39.1%	3,828	35.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	64	100.0%	10,801	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	32	50.0%	1,476	13.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	20	31.3%	3,283	30.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	12	18.8%	6,042	55.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	64	100.0%	10,801	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	13	56.5%	555	15.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	6	26.1%	916	26.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	4	17.4%	2,007	57.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	3,478	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

*Information based on 2015 ACS data

CRA Loan Distribution Table

Exam: Croghan - 2019

Assessment Area/Group: 2017 Toledo Ohio MSA #45780

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	10.0%	250	8.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	1	10.0%	250	8.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	6	60.0%	1,674	57.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	3	30.0%	990	34.0%	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%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	2,914	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	5	50.0%	1,305	44.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	5	50.0%	1,609	55.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	2,914	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	1	10.0%	64	2.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	4	40.0%	807	27.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	50.0%	2,044	70.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	2,914	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	60.0%	559	42.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	40.0%	746	57.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	1,305	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

*Information based on 2015 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.