

# PUBLIC DISCLOSURE

September 26, 2022

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Genoa Banking Company  
RSSD# 504311

801 Main Street  
Genoa, Ohio 43430

Federal Reserve Bank of Cleveland

P.O. Box 6387  
Cleveland, Ohio 44101-1387

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

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**INSTITUTION'S CRA RATING: "Satisfactory"**

The Lending Test is rated: "Satisfactory"

The Community Development Test is rated: "Satisfactory"

This rating is based on the following conclusions with respect to the performance criteria:

- The loan-to-deposit ratio is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs;
- A majority of loans and other lending-related activities are in the AA;
- The distribution of loans reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses and farms of different sizes; and,
- The geographic distribution of loans reflects poor dispersion throughout the AA.
- The bank's community development performance demonstrates an adequate responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

**SCOPE OF EXAMINATION**

This is Genoa's first CRA performance evaluation utilizing the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions*.<sup>1</sup> This evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as assessment area (AA) demographic and economic characteristics and credit needs.

The following data was reviewed:

- Genoa's 22-quarter average net loan-to-deposit ratio.
- Under the lending test, HMDA-reportable loans were analyzed from July 1, 2016 – December 31, 2021. Small business and small farm loans were analyzed from January 1, 2020, through December 31, 2021. Consumer loans and home equity lines of credit were analyzed from January 1, 2021 – December 31, 2021.
- HMDA-reportable loans consist of home purchase, refinance, and home improvement loans. There was enough volume to evaluate these products separately in 2016, 2017, and 2019. In 2018, 2020, and 2021, home purchase and refinance loans were evaluated separately, as there was not enough volume to conduct a meaningful analysis of home improvement loans. Multi-family, other purpose open-end, and other purpose closed-end loans were not considered in this evaluation due to limited volume.
- There was enough volume to evaluate small business and small farm loans separately in 2020 and 2021.

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<sup>1</sup> As of December 31, of both prior two calendar years, Genoa had at least \$330 million in assets, and as of December 31 of either of the past two calendar years, had less than \$1.322 billion in assets.

- Consumer loans consist of motor vehicle, other secured, and other unsecured. There was enough volume to evaluate these products separately. Home equity lines of credit were reviewed separately.
- The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 amended the Home Mortgage Disclosure Act (HMDA) to add new data points. These changes were effective January 1, 2018, and included the reporting of home equity lines of credit for certain institutions, the addition of new loan purposes, and changes to the definitions of some existing fields. Due to the breadth of these changes, HMDA-reportable loans originated or purchased on or after January 1, 2018, are separated from loans made before that date.
- Based on the total loan volume by number and dollar amount, HMDA-reportable loans (home purchase, refinance, and home improvement, respectively) received the most weight, followed by small business, consumer (motor vehicle, other secured, and other unsecured, respectively), home equity lines of credit, and small farms. Incomes were available for all consumer loans and home equity lines of credit. A sample of revenues was obtained for small business and small farm loans. If lending performance differed between years, more weight was given to 2020 performance, the year with the most loans by volume and dollar amount.
- Genoa's lending performance also was compared to the performance of the aggregate of all lenders in 2016, 2017, 2018, 2019, 2020, and 2021. The aggregate of all lenders includes all lenders required to report HMDA-reportable data in the respective AAs.
- Genoa facilitated 1,212 Paycheck Protection Program (PPP) loans totaling \$68.6 million between April 3, 2020, through May 31, 2021. PPP loans are administered by the Small Business Administration (SBA) as part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). Consistent with intermediate small bank procedures and information provided in the May 27, 2020, joint statement on CRA Consideration for Activities in Response to COVID-19,<sup>2</sup> Genoa opted to have its PPP loans evaluated in the retail lending test.
- Borrower and geographic distribution received equal weight based on the percentage of LMI families compared the percentage of LMI tracts.
- Lending performance in low-, moderate-, middle-, and upper-income tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when impacting the outcome of the analyses.
- Under the community development test, community development activities funded from April 25, 2017, to September 26, 2022, were evaluated.

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<sup>2</sup> [May 27, 2020 Joint Statement](#)

**DESCRIPTION OF INSTITUTION**

Genoa is an intrastate community bank headquartered in Genoa, Ohio. The bank’s characteristics include:

- Genoa is a wholly owned subsidiary of GenBanc, Inc. (GenBanc). GenBanc has two non-bank subsidiaries. Neither engage in lending or other CRA-related activities.
- As of June 30, 2022, Genoa had total assets of \$516.0 million and total deposits of \$454.5 million. This represents a 58.2% increase in total assets and a 71.2% increase in total deposits since the previous CRA evaluation.
- In addition to its main office with a full-service Automated Teller Machine (ATM), the bank has eight branches with full-service ATMs in Ottawa, Lucas, and Wood counties. The main office is in Genoa (Ottawa County), along with five branches in Rossford (Wood County), Maumee and Oregon (Lucas County), and Port Clinton and Millbury (Ottawa County) in middle-income tracts. There are two branches in upper-income tracts in Sylvania (Lucas County) and Elmore (Ottawa County). The remaining branch is in downtown Toledo (Lucas County) in a low-income tract. The main office and all branches offer drive-thru services and weekend and extended hours of service.
- Genoa opened the branch in downtown Toledo on October 22, 2018, and did not close any branches during the evaluation period.
- Genoa submitted an application to this Reserve Bank on July 5, 2022, to open a branch in Fremont (Sandusky County). Because this branch was not open before the start of this review, activities from this branch will not be considered in this evaluation.
- Genoa is a full-service retail bank that offers traditional products, including consumer and business checking and savings accounts, home equity loans, motor vehicle loans, credit cards, and commercial and agriculture loans.
- Genoa’s loan portfolio composition is shown in the table below.

<b>Composition of Loan Portfolio as of June 30, 2022</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	26,325	7.0
Farmland	20,950	5.6
1-4 Family Residential Real Estate	151,798	40.3
Multifamily Residential Real Estate	8,069	2.1
Non-Farm Non-Residential Real Estate	119,707	31.8
Agricultural	2,831	0.8
Commercial and Industrial	21,849	5.8
Consumer	24,422	6.5
Other	500	0.1
<b>Gross Loans</b>	<b>376,451</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated “Satisfactory” under the CRA at its April 24, 2017, performance evaluation.

There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

## DESCRIPTION OF ASSESSMENT AREA

Due to changes to Metropolitan Statistical Area (MSA) designations by the Office of Management and Budget (OMB) in 2018, Ottawa County moved from Nonmetropolitan Ohio back to the Toledo, OH MSA #45780 (Toledo), effective as of January 1, 2019. Because most of the lending activity occurred while Ottawa County was part of the Toledo MSA, Genoa will only have one delineated CRA AA in this evaluation.<sup>3</sup>

Genoa's Toledo AA consists of the entireties of Lucas, Ottawa, and Wood counties, along with one tract in the northwestern part of Sandusky County<sup>4</sup> and excluding Fulton County in the western part of the Toledo MSA. See Appendix A for an AA maps and Appendix B for additional demographic data.

- This AA consists of 36 low-, 27 moderate-, 65 middle-, 40 upper-, and two unknown-income tracts.
- 95.0% of total LMI tracts are concentrated in Toledo (Lucas County) and 5.0% in Bowling Green (Wood County).
- According to the June 30, 2021, Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits Report, Genoa ranked ninth amongst 26 financial institutions with a 2.7% market share in its AA. The top three market holders, The Huntington National Bank, Fifth Third Bank, and KeyBank National Association hold 22.3%, 22.7%, and 13.1% of deposits in the market, respectively. This leaves the residual 41.9% market share available to the remaining 23 financial institutions, including Genoa, to compete. Genoa ranked 10<sup>th</sup> amongst 27 financial institutions with a 2.5% market share in the Toledo MSA.
- The 2020 HMDA Peer Market data indicates that Genoa ranks fifth out of 96 HMDA reporters in the MSA and originated 959 loans. By comparison, first-ranked Huntington National Bank and second-ranked Fifth Third Bank originated 3,313 and 1,831 loans respectively. Genoa ranked ninth, eleventh, sixth, and seventh in 2019, 2018, 2017, and 2016, respectively among HMDA reporters in the MSA.

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<sup>3</sup> During the previous evaluation Genoa had two delineated AAs: Toledo AA - consisting of entireties of Lucas and Wood counties and Nonmetropolitan Ohio AA - consisting of the entirety of Ottawa County and one upper-income tract in Sandusky County.

<sup>4</sup> Although Sandusky County (part of Nonmetropolitan Ohio) is not in the Toledo MSA, because Genoa has no branches or deposit-taking facilities in Sandusky County and the tract is contiguous to Ottawa and Wood counties, Sandusky County was included in the Toledo MSA AA. Performance context information does not include a separate discussion of Sandusky County since demographic characteristics are like Ottawa County's.

**Community Contact**

An interview was conducted with a community contact to provide additional information regarding AA credit needs and context to demographic and economic conditions of the local community. The interview was conducted with a representative from a community foundation that serves as a resource for local nonprofit organizations. The contact emphasized there is an affordable housing crisis in Toledo. There is a lack of quality affordable housing for LMI individuals, families, and seniors and there is a need for low-cost home improvement loans due to many aged and vacant housing stock, particularly in lower-income areas. Major repairs are required to keep these houses livable. There are public-private initiatives to repair vacant homes that are salvageable and encourage more landlords to accept Section 8 housing vouchers. The contact said Toledo continues to see capital investment and job creation, particularly in manufacturing. General Motors recently announced it will invest \$760 million into its Toledo Propulsions Systems facility to produce drive units for electric vehicles. This facility employs about 1,700 workers and production is expected to begin in late 2023 or early 2024. The contact indicated there is a lack of internet connectivity that can limit the area’s education, productivity, and growth. The contact stated there are opportunities for local financial institutions to finance all aspects of affordable housing and help small business owners get access to responsible small-dollar loans to encourage continued economic growth. Lastly, the contact indicated local financial institutions, including, but not limited to Genoa, are involved in the community.

**Population Characteristics**

<b>Population Change</b>			
<b>Assessment Area: Toledo, OH MSA #45780</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Lucas County	436,261	428,294	-1.8
Ottawa County	41,162	40,253	-2.2
Sandusky County	60,187	58,351	-3.1
Wood County	128,885	131,113	1.7
<b>Toledo, OH MSA</b>	<b>648,793</b>	<b>641,549</b>	<b>-1.1</b>
<b>Ohio</b>	<b>11,575,977</b>	<b>11,693,217</b>	<b>1.0</b>
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey  U.S. Census Bureau Vintage 2020 Population Estimates for the United States and States</i>			

- Lucas and Ottawa counties experienced a loss in population from 2015 through 2020 compared to Ohio and Wood County that experienced slight gains in population.
- 77.4% of the AA population was 18 years of age or older, the legal age to enter a contract.
- 14.5% of the population was age 65 and over, compared to 15.1% in Ohio.
- 21.2% of the population in Ottawa County was age 65 and over; the county’s higher percentage of aging population could indicate a smaller workforce and increased need of services.

- Only 13.2% of the AA’s population resides in low-income tracts and 14.5% resides in moderate-income tracts.
- According to 2020 Census data, Toledo (Lucas County) is the most populous city in the AA with a population of 270,871; its population decreased by 5.7% since 2010. Bowling Green is the most populous city in Wood County with a population of 30,808; its population increased by 2.6% since 2010. Port Clinton is the largest city in Ottawa County with a population of 6,025; its population decreased by 0.5% since 2010.

**Income Characteristics**

Borrower Income Levels Toledo, OH MSA #45780										
FFIEC Estimated Median Family Income			Low		Moderate		Middle		Upper	
Year	\$	% Change	0	- 49.9%	50%	- 79.9%	80%	- 119.9%	120%	- & above
2016	\$61,000		0	- \$30,499	\$30,500	- \$48,799	\$48,800	- \$73,199	\$73,200	- & above
2017	\$61,500	0.8	0	- \$30,749	\$30,750	- \$49,199	\$49,200	- \$73,799	\$73,800	- & above
2018	\$67,200	9.3	0	- \$33,599	\$33,600	- \$53,759	\$53,760	- \$80,639	\$80,640	- & above
2019	\$66,600	-0.9	0	- \$33,299	\$33,300	- \$53,279	\$53,280	- \$79,919	\$79,920	- & above
2020	\$68,300	2.6	0	- \$34,149	\$34,150	- \$54,639	\$54,640	- \$81,959	\$81,960	- & above
2021	\$69,800	2.2	0	- \$34,899	\$34,900	- \$55,839	\$55,840	- \$83,759	\$83,760	- & above

Source: 2016-2021 FFIEC Census Data

- The median family income (MFI) in the Toledo MSA increased each year from 2016 through 2021, except for a slight decrease in 2019. Overall, MFI increased by 14.4% during this timeframe.
- According to 2015 Census data, AA MFI at \$60,365 is approximately 1.0 times less than Ohio MFI at \$62,817.
- According to 2015 Census data, Wood County had the highest MFI at \$71,122; followed by Ottawa County at \$64,597, and Lucas County at \$55,978.

Poverty Rates Assessment Area: Toledo, OH MSA #45780			
Area	2018	2019	2020
Lucas County	18.7	18.0	17.5
Ottawa County	9.5	8.1	7.7
Sandusky County	10.0	9.6	10.4
Wood County	11.9	11.2	9.9
Ohio	13.8	13.0	12.6
United States	13.1	12.3	11.9

Source: U.S. Census Bureau Small Area Income and Poverty Estimates Program

- From 2018 through 2020 poverty rates in Lucas County were approximately 1.4 times higher than poverty rates in Ohio and the United States. Poverty rates in Lucas County were at least 1.6 to 2.3 times higher than poverty rates in Ottawa and Wood counties.
- Of the 150,621 families in the AA, 39.8% are designated as LMI with 13.9% living below poverty, compared to 16.5% of families living below poverty in Lucas County and 11.5% in Ohio.



- Of the 246,564 households in the AA, 18.2% are below the poverty level and 3.3% receive public assistance, compared to 20.2% of households below poverty in Lucas County and 15.0% in Ohio.
- According to Federal Reserve Economic Data (FRED) maintained by the Federal Reserve Bank of St. Louis,<sup>5</sup> in 2019, 15.7% of the population in Lucas County received Supplemental Nutrition Assistance Program (SNAP) benefits, compared to 7.5% and 4.9% of the population in Ottawa and Wood counties, respectively. SNAP helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

**Housing Characteristics**

<b>Housing Cost Change</b>						
<b>Assessment Area: Toledo, OH MSA #45780</b>						
<b>Area</b>	<b>Median Housing Value</b>			<b>Median Gross Rent</b>		
	<b>2015</b>	<b>2020</b>	<b>Percent Change</b>	<b>2015</b>	<b>2020</b>	<b>Percent Change</b>
Lucas County	\$104,200	\$120,900	16.0	\$666	\$760	14.1
Ottawa County	\$138,800	\$154,500	11.3	\$696	\$752	8.0
Sandusky County	\$110,100	\$118,600	7.7	\$634	\$716	12.9
Wood County	\$146,300	\$165,400	13.1	\$727	\$811	11.6
<b>Toledo, OH MSA</b>	<b>\$116,418</b>	<b>\$134,900</b>	<b>15.9</b>	<b>\$676</b>	<b>\$767</b>	<b>13.5</b>
<b>Ohio</b>	<b>\$129,900</b>	<b>\$151,400</b>	<b>16.6</b>	<b>\$730</b>	<b>\$825</b>	<b>13.0</b>
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey                  2016-2020 U.S. Census Bureau: American Community Survey</i>						

- Median housing values increased 15.9% from 2015 to 2020 in the AA. Overall, housing became less affordable across the AA, most likely because MFI did not keep pace with home price growth.
- Based on the 2015 Census data, the affordability ratio<sup>6</sup> was 39.3 in the AA compared to 38.1 in Ohio. While housing across the AA is generally more affordable than other parts of Ohio, housing is less affordable at 36.2 in Wood County.
- Median gross rents in Lucas, Ottawa, and Wood counties increased between 8.0% to 14.1% from 2015 to 2020. The rise in median gross rents indicates the need for more affordable housing. According to 2015 Census data, 46.9% of all renters in the AA have rental costs that are at least 30.0% of their income.
- According to the U.S. Department of Housing and Urban Development’s (HUD)’s 2021 Fair Market Rents data, the average rent for a one-bedroom unit was \$613 and \$793 for a

<sup>5</sup> [Federal Reserve Economic Data \(FRED\)](#)

<sup>6</sup> 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.

two-bedroom unit in the Toledo MSA. Rents rose by 3.5% compared to a 2.2% increase in MFI from 2020 to 2021. While rents are rising, Toledo’s median two-bedroom rent is still below the national average of \$1,150.

- There are 285,650 housing units in the AA, of which 54.9% are owner-occupied, 31.5% are rentals, and 13.7% are vacant. While more households own their homes than rent, with 45.2% of housing units across the AA being either rental or vacant, there may be limited opportunities to originate mortgage loans, particularly in LMI tracts. Approximately 14.0% of total housing units are in low-income tracts; 25.8% are owner-occupied and 74.3% are either rental or vacant. Approximately 15.1% of total housing units are in moderate-income tracts, 42.8% are owner-occupied, and 57.2% are either rental or vacant.
- Housing units in the AA primarily consist of single-family dwellings (71.9%) and mobile homes (4.1%), which is comparable to 73.0% single-family dwellings and 3.9% mobile homes across Ohio.
- The median age of housing stock in the AA is 59 years old and 32.2% of housing units were built prior to 1950. The median age of housing stock in LMI tracts is 61 years old. The age of the housing stock across the AA, particularly in LMI tracts, demonstrates a potential need for home improvement lending and refinance or home improvement loans to remove lead-based paint that was commonly used on houses and apartments built before 1978.<sup>7</sup>
- In 2019, Genoa began offering a special home improvement loan for individuals with incomes below 80% of area median income and/or are in LMI tracts. These home improvement loans help finance rehabilitation work to improve the condition of the home (e.g., repair of a leaking roof or falling porch or removal of lead-based paint). From May 2019 through December 31, 2021, Genoa originated 13 loans through this program with a current balance of \$47,538. The community contact indicated there is a need to fund needed and costly repairs on older housing stock that are primarily in lower-income neighborhoods.

<b>Housing Cost Burden</b>						
<b>Assessment Area: Dayton-Kettering, OH MSA #19430</b>						
<b>Area</b>	<b>Cost Burden – Owners</b>			<b>Cost Burden – Renters</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>
Lucas County	63%	35%	19%	72%	35%	42%
Ottawa County	60%	29%	16%	71%	23%	34%
Sandusky County	63%	25%	14%	69%	30%	36%
Wood County	68%	31%	17%	79%	40%	39%
<b>Toledo, OH MSA</b>	<b>63%</b>	<b>33%</b>	<b>18%</b>	<b>73%</b>	<b>35%</b>	<b>41%</b>
<b>Ohio</b>	<b>64%</b>	<b>32%</b>	<b>17%</b>	<b>73%</b>	<b>34%</b>	<b>40%</b>

*Cost Burden is housing cost that equals 30 percent or more of household income*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy*

<sup>7</sup>[Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning](#)

- About 18.0% of all homeowners and 41.0% of all renters across the MSA are cost-burdened, compared to 17.0% of all homeowners and 40.0% of all renters in Ohio.
- The data shows that cost burden disproportionately affects renter-occupied households, particularly low-income renters and low-income homeowners.
- Cost-burdened renters may have a difficult time saving enough monies to purchase a motor vehicle or otherwise afford increasing rents.

**Labor, Employment and Economic Characteristics**

<b>Unemployment Rates</b>					
<b>Assessment Area: Toledo, OH MSA #45780</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Lucas County	5.9%	5.2%	4.7%	10.3%	6.2%
Ottawa County	6.7%	6.3%	5.7%	9.1%	6.1%
Sandusky County	4.7%	4.5%	4.3%	8.1%	5.2%
Wood County	4.4%	4.0%	3.7%	7.0%	4.3%
<b>Toledo, OH MSA</b>	<b>5.5%</b>	<b>5.0%</b>	<b>4.5%</b>	<b>9.4%</b>	<b>5.7%</b>
<b>Ohio</b>	<b>5.0%</b>	<b>4.5%</b>	<b>4.2%</b>	<b>8.2%</b>	<b>5.1%</b>
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- While unemployment rates decreased each year (2017 through 2019) across the AA, the unemployment rate in 2020 increased substantially because of the COVID-19 emergency. While the unemployment rates improved in 2021, unemployment rates have not returned to pre-pandemic levels. Unemployment rates in Lucas and Ottawa counties remain higher than Ohio’s rates during this period.
- As reported by Ohio Office of Research:<sup>8</sup>
  - Land use in Lucas County is primarily urban with 45.0% available for residential, commercial, industrial, or recreational development and 30.7% is used as farmland. In contrast, land use in Ottawa and Wood counties is primarily rural with 60.1% and 78.0%, respectively, used as farmland and only 14.2% and 13.6%, respectively, available for residential, commercial, industrial, or recreational development.
  - The leading industries in Lucas County are trade, transportation, and utilities; construction; professional and business services; education and health services; and leisure and hospitality.
  - The leading industries in Ottawa County are leisure and hospitality, professional and business services, education and health services, and construction.
  - The leading industries in Wood County are trade, transportation, and utilities; professional and business services; leisure and hospitality; financial services; education and health services; and construction.

<sup>8</sup> Ohio County Trends: [County Trends \(ohio.gov\)](https://www.ohio.gov)

- According to Regional Growth Partnership in Northwest Ohio,<sup>9</sup> major employers in the Toledo MSA include, but are not limited to, ProMedica Health Systems, Mercy Health, University of Toledo, Whirlpool Corporation, FCA US LLC., and Bowling Green State University. The AA's median average weekly wage for the private sector is \$865 and the average weekly wage for the service-providing sector is \$736, which indicates employed persons could afford the area's highest median rent of \$767.
- Based on 2015 Census data and BroadbandOhio,<sup>10</sup> 84.8% of households in Lucas County have a broadband internet subscription and 42.0% of the county's populated area and 21.0% of households do not have access to the minimum bandwidth needed for basic internet activity. In Ottawa County, 79.7% of households have a broadband internet subscription and 66.0% of the county's populated area and 25.0% of households do not have access to the minimum bandwidth needed for basic internet activity. In Wood County, 87.8% of households have a broadband internet subscription and 78.0% of the county's populated area and 23.0% of households do not have access to the minimum bandwidth needed for basic internet activity. The community contact stated there is a lack of internet connectivity that can limit the area's education, productivity, and growth.
- A Federal Reserve Bank of Cleveland report, *Access to Broadband is Essential for Positive Economic Outcomes*,<sup>11</sup> found that employment rates differed markedly for those with and without broadband in both urban and rural counties. Nationally, those with access to a broadband-enabled computer are employed at a higher rate in urban and rural counties.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS<sup>12</sup>

Genoa's overall CRA performance is rated "Satisfactory." Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

#### LENDING TEST

The net loan-to-deposit ratio is reasonable. The bank made a majority of loans inside its AA. The borrower distribution among individuals and businesses and farms of different sizes is reasonable. The geographic distribution reflects a poor dispersion throughout the AA with a moderate level of lending gaps.

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<sup>9</sup> Regional Growth Partnership in Northwest Ohio: <https://rgp.org/major-employers-northwest-ohio/>

<sup>10</sup> BroadbandOhio: [https://broadband.ohio.gov/static/countyprofiles/Washington%20County\\_BBOH.pdf](https://broadband.ohio.gov/static/countyprofiles/Washington%20County_BBOH.pdf)

<sup>11</sup> Cleveland Fed: <https://www.clevelandfed.org/en/newsroom-and-events/publications/notes-from-the-field/nftf-20210816-access-to-broadband-is-essential-for-positive-economic-outcomes.aspx>

<sup>12</sup> The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

**Net Loan-to-Deposit Ratio (NLTD)**

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending considering performance context, such as Genoa’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated FDIC institutions (custom peer group). The custom peer group was selected based on asset size, market share, and the area where they are located.

Loan-to-Deposit Ratios						
The Genoa Banking Company, Genoa, OH				The First National Bank of Bellevue, OH	The Old Fort Bankign Company, Old Fort, OH	CUSTOM PEER RATIO
As of Date	Net Loans \$(000s)	Total Deposits \$(000s)	Bank Ratio	Peer 1 Ratio	Peer 2 Ratio	Custom Peer Ratio
June 30, 2022	372,066	454,452	81.9	63.8	52.9	58.3
March 31, 2022	353,654	449,681	78.7	59.1	51.3	55.2
December 31, 2021	346,874	454,097	76.4	61.3	54.5	57.9
September 30, 2021	352,498	445,863	79.1	61.5	58.2	59.8
June 30, 2021	344,763	435,070	79.2	69.5	61.8	65.6
March 31, 2021	352,039	440,223	80.0	68.4	66.5	67.5
December 31, 2020	335,381	412,765	81.3	74.0	69.1	71.5
September 30, 2020	350,506	398,236	88.0	78.2	71.3	74.8
June 30, 2020	341,146	387,776	88.0	82.8	72.9	77.8
March 31, 2020	308,364	348,423	88.5	85.0	68.5	76.7
December 31, 2019	300,731	340,381	88.4	92.4	70.1	81.3
September 30, 2019	302,980	334,491	90.6	87.2	66.6	76.9
June 30, 2019	296,057	330,787	89.5	97.3	66.5	81.9
March 31, 2019	282,003	331,682	85.0	90.0	67.9	78.9
December 31, 2018	274,440	320,465	85.6	97.4	68.0	82.7
September 30, 2018	270,421	317,268	85.2	93.8	66.3	80.0
June 30, 2018	264,698	291,174	90.9	95.4	66.9	81.2
March 31, 2018	258,070	288,269	89.5	86.6	65.5	76.0
December 31, 2017	253,361	279,716	90.6	94.2	66.4	80.3
September 30, 2017	247,189	273,458	90.4	85.6	65.8	75.7
June 30, 2017	242,275	273,430	88.6	96.2	67.4	81.8
March 31, 2017	234,861	268,629	87.4	91.4	66.0	78.7
<b>Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation</b>			<b>85.6</b>	<b>82.3</b>	<b>65.0</b>	<b>73.7</b>

Genoa’s NLTD ratio averaged 85.6% compared to the custom peer group average of 73.7%. Bank management indicated there has been a large increase in deposits (latest nine quarters), outpacing loan growth, due to direct payments to consumers and small businesses from various economic stimulus programs in response to the COVID-19 emergency, a similar trend amongst other community banks. Genoa’s NLTD ratio is reasonable given the bank’s size, financial condition, and AA credit needs.

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AA.

**2016-2017**

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Improvement	87	90.6	3,483	90.6	9	9.4	362	9.4
Home Purchase - Conventional	362	84.8	60,774	82.4	65	15.2	12,944	17.6
Multi-Family Housing	8	88.9	2,093	82.7	1	11.1	439	17.3
Refinancing	184	88.0	26,625	87.0	25	12.0	3,972	13.0
<b>Total HMDA related</b>	<b>641</b>	<b>86.5</b>	<b>92,975</b>	<b>84.0</b>	<b>100</b>	<b>13.5</b>	<b>17,717</b>	<b>16.0</b>
<b>Total Loans</b>	<b>641</b>	<b>86.5</b>	<b>92,975</b>	<b>84.0</b>	<b>100</b>	<b>13.5</b>	<b>17,717</b>	<b>16.0</b>

*Note: Percentages may not total 100.0 percent due to rounding.*

From 2016 to 2017, 86.5% by volume and 84.0% by dollar amount were made inside the AA. Therefore, a majority of loans by volume and other lending-related activities are in the bank's AA.

**2018-2021**

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Motor Vehicle	271	91.6	6,472	90.9	25	8.4	644	9.1
Other – Secured	72	76.6	10,802	72.9	22	23.4	4,008	27.1
Other – Unsecured	63	95.5	652	93.2	3	4.5	47	6.8
<b>Total Consumer related</b>	<b>406</b>	<b>89.0</b>	<b>17,926</b>	<b>79.2</b>	<b>50</b>	<b>11.0</b>	<b>4,700</b>	<b>20.8</b>
Home Improvement	81	90.0	4,061	83.8	9	10.0	787	16.2
Home Purchase - Conventional	1,232	85.4	256,279	82.9	211	14.6	52,845	17.1
Home Purchase – FHA	1	100.0	240	100.0	0	0.0	0	0.0
Multi-Family Housing	36	90.0	10,359	89.4	4	10.0	1,222	10.6
Other Purpose Closed-End	63	88.7	2,662	90.2	8	11.3	288	9.8
Refinancing	1,210	86.7	230,679	84.6	185	13.3	41,995	15.4
<b>Total HMDA related</b>	<b>2,623</b>	<b>86.3</b>	<b>504,280</b>	<b>83.8</b>	<b>417</b>	<b>13.7</b>	<b>97,137</b>	<b>16.2</b>
Home Equity	116	86.6	8,715	84.4	18	13.4	1,615	15.6
<b>Total Non-HMDA Residential</b>	<b>116</b>	<b>86.6</b>	<b>8,715</b>	<b>84.4</b>	<b>18</b>	<b>13.4</b>	<b>1,615</b>	<b>15.6</b>
Small Business	1,452	85.1	147,636	84.6	255	14.9	26,877	15.4
<b>Total Small Business related</b>	<b>1,452</b>	<b>85.1</b>	<b>147,636</b>	<b>84.6</b>	<b>255</b>	<b>14.9</b>	<b>26,877</b>	<b>15.4</b>
Small Farm	77	89.5	10,974	79.4	9	10.5	2,848	20.6
<b>Total Small Farm related</b>	<b>77</b>	<b>89.5</b>	<b>10,974</b>	<b>79.4</b>	<b>9</b>	<b>10.5</b>	<b>2,848</b>	<b>20.6</b>
<b>Total Loans</b>	<b>4,674</b>	<b>86.2</b>	<b>689,531</b>	<b>83.8</b>	<b>749</b>	<b>13.8</b>	<b>133,177</b>	<b>16.2</b>

*Note: Percentages may not total 100.0 percent due to rounding.*



From 2018 to 2021, 86.2% by volume and 83.8% by dollar amount the bank's total loans were made inside the AA. Therefore, a majority of loans by volume and other lending-related activities are in the bank's AA.

In response to the COVID-19 emergency, Genoa allowed consumer and commercial customers to defer loan payments in response to economic hardship. During the evaluation period, Genoa modified commercial loan payments for 140 businesses and 261 consumer and mortgage loan customers. These deferments helped promote stability to consumers and businesses experiencing financial hardship due to COVID-19 and demonstrate responsiveness to serving the credit needs of its AAs.

### **Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes**

The borrower distribution of HMDA, small business, home equity lines of credit, and small farm loans is reasonable and consumer loans is excellent.

#### HMDA Lending

During the evaluation period, Genoa originated 3,264 HMDA loans totaling \$593.4 million. Genoa's performance was compared to the percentage of families (proxy) and the aggregate of all lenders. Genoa's borrower distribution of home purchase, refinance, and home improvement loans is reasonable. See Appendix C for explicit HMDA-reportable lending data.

#### *Home Purchase Lending*

In 2021, Genoa's originated 320 home purchase loans totaling \$75.3 million. Genoa also originated 23 (7.2%) home purchase loans to borrowers with unknown-income designations. Genoa originated 12 (3.8%) home purchase loans to low-income borrowers, which was significantly below the percentage of families at 23.2% and significantly below the aggregate of all lenders at 8.4%. Genoa originated 46 (14.4%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 16.6% and the aggregate of all lenders at 22.5%.

In 2020, Genoa originated 317 home purchase loans totaling \$70.6 million. Genoa also originated 19 (6.0%) home purchase loans to borrowers with unknown-income designations. Genoa originated nine (2.8%) home purchase loans to low-income borrowers, which was significantly below the percentage of families at 23.2% and the aggregate of all lenders at 9.4%. Genoa originated 30 (9.5%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 16.6% and significantly below the aggregate of all lenders at 23.3%.

In 2019, Genoa originated 307 home purchase loans totaling \$60.8 million. Genoa also originated eight (2.6%) home purchase loans to borrowers with unknown-income designations. Genoa originated 14 (4.6%) home purchase loans to low-income borrowers, which was significantly

below the percentage of families at 23.2% and below the aggregate of all lenders at 8.0%. Genoa originated 44 (14.3%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 16.6% and the aggregate of all lenders at 21.9%.

In 2018, Genoa originated 289 home purchase loans totaling \$49.8 million. Genoa also originated 12 (4.2%) home purchase loans to borrowers with unknown-income designations. Genoa originated 15 (5.2%) home purchase loans to low-income borrowers, which was significantly below the percentage of families at 22.9% and below the aggregate of all lenders at 9.1%. Genoa originated 48 (16.6%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 16.4% and fell below the aggregate of all lenders at 21.5%.

In 2017, Genoa originated 240 home purchase loans totaling \$40.8 million. Genoa also originated 10 (4.2%) home purchase loans to borrowers with unknown-income designations. Genoa originated three (1.3%) home purchase loans to low-income borrowers, which was significantly below the percentage of families at 22.9% and the aggregate of all lenders at 6.5%. Genoa originated 30 (12.5%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 16.4% and the aggregate of all lenders at 20.4%.

In 2016, Genoa originated 122 home purchase loans totaling \$20.0 million. Genoa also originated four (3.3%) home purchase loans to borrowers with unknown-income designations. Genoa originated two (1.6%) home purchase loans to low-income borrowers, which was significantly below the percentage of families at 21.5% and the aggregate of all lenders at 7.2%. Genoa originated 23 (18.9%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 16.6% and fell slightly below the aggregate of all lenders at 19.8%.

Given Genoa's performance consistently fell significantly below proxy and the aggregate of all lenders, borrower distribution of home purchase loans to low-income borrowers is poor. Considering the high rates of poverty and unemployment and home price growth, borrower distribution is reasonable to moderate-income borrowers since the bank's performance was just below proxy and the aggregate of all lenders.

#### *Refinance Lending*

In 2021, Genoa originated 359 refinance loans totaling \$65.7 million. Genoa also originated 11 (3.1%) refinance loans to borrowers with unknown-income designations. Genoa originated 11 (3.1%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 23.2% and below the aggregate of all lenders at 5.7%. Genoa originated 45 (12.5%) refinance loans to moderate-income borrowers, which was below the percentage of families at 16.6% and the aggregate of all lenders at 16.8%.

In 2020, Genoa originated 592 refinance loans totaling \$118.9 million. Genoa also originated 11 (1.9%) refinance loans to borrowers with unknown-income designations. Genoa originated seven (1.2%) refinance loans to low-income borrowers, which was significantly below the percentage of



families at 23.2% and the aggregate of all lenders at 4.7%. Genoa originated 50 (8.4%) refinance loans to moderate-income borrowers, which was below the percentage of families at 16.6% and the aggregate of all lenders at 12.7%.

In 2019, Genoa originated 171 refinance loans totaling \$34.2 million. Genoa also originated two (1.2%) refinance loans to borrowers with unknown-income designations. Genoa originated five (2.9%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 23.2% the aggregate of all lenders at 6.7%. Genoa originated 19 (11.1%) refinance loans to moderate-income borrowers, which was below the percentage of families at 16.6% and the aggregate of all lenders at 14.7%.

In 2018, Genoa originated 88 refinance loans totaling \$11.9 million. Genoa also originated four (4.5%) refinance loans to borrowers with unknown-income designations. Genoa originated four (4.5%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 22.9% and the aggregate of all lenders at 10.3%. Genoa originated 16 (18.2%) refinance loans to moderate-income borrowers, which exceeded the percentage of families at 16.4% and the aggregate of all lenders at 17.7%.

In 2017, Genoa originated 99 refinance loans totaling \$13.8 million. Genoa also originated three (3.0%) refinance loans to borrowers with unknown-income designations. Genoa originated two (2.0%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 22.9% and the aggregate of all lenders at 6.4%. Genoa originated eight (8.1%) refinance loans to moderate-income borrowers, which was significantly below the percentage of families at 16.4% and below the aggregate of all lenders at 14.7%.

In 2016, Genoa originated 85 refinance loans totaling \$12.8 million. Genoa also originated one (1.2%) refinance loans to borrowers with unknown-income designations. Genoa originated three (3.5%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 21.5% and below the aggregate of all lenders at 5.5%. Genoa originated 11 (12.9%) refinance loans to moderate-income borrowers, which was below the percentage of families at 16.6% and exceeded the aggregate of all lenders at 12.0%.

Given Genoa's performance consistently fell significantly below proxy and the aggregate of all lenders, borrower distribution of refinance loans to low-income borrowers is poor. Borrower distribution is reasonable to moderate-income borrowers since the bank's performance was just below or exceeded proxy and the aggregate of all lenders.

#### *Home Improvement Lending*

In 2019, Genoa originated 27 home improvement loans totaling \$1.2 million. Genoa originated no home improvement loans to low-income borrowers compared to the percentage of families at 23.2% and the aggregate of all lenders at 8.7%. Genoa originated three (11.1%) home improvement loans to moderate-income borrowers, which was below the percentage of families at 16.6% and

the aggregate of all lenders at 18.6%.

In 2017, Genoa originated 61 home improvement loans totaling \$2.3 million. Genoa also originated eight (13.1%) home improvement loans to borrowers with unknown-income designations. Genoa originated three (4.9%) home improvement loans to low-income borrowers, which was significantly below the percentage of families at 22.9% and below the aggregate of all lenders at 9.4%. Genoa originated 11 (18.0%) home improvement loans to moderate-income borrowers, which exceeded the percentage of families at 16.4% and was below the aggregate of all lenders at 22.8%.

In 2016, Genoa originated 26 home improvement loans totaling \$1.2 million. Genoa also originated four (15.4%) home improvement loans to borrowers with unknown-income designations. Genoa originated no home improvement loans to low-income borrowers, compared to the percentage of families at 21.5% and the aggregate of all lenders at 10.6%. Genoa originated six (23.1%) home improvement loans to moderate-income borrowers, which exceeded the percentage of families at 16.6% and the aggregate of all lenders at 20.2%.

Given Genoa's performance consistently fell significantly below proxy and the aggregate of all lenders, borrower distribution of home improvement loans to low-income borrowers is poor. Borrower distribution is reasonable to moderate-income borrowers since the bank's performance was just below or exceeded proxy and the aggregate of all lenders.

While Genoa began offering a home improvement loan product targeted toward LMI borrowers and geographies in 2019, there was not enough volume to evaluate home improvement loans separately in either 2021 or 2020. The community contact expressed a need for this type of product. As mentioned earlier, Genoa originated 13 home improvement loans since this product was launched.

### Small Business Lending

During the evaluation period, Genoa originated 1,452 small business loans to businesses of different sizes totaling \$147.7 million, and 1,190 (82.0%) loans totaling \$68.0 million were PPP loans. Of those loans, 92.6% were extended to businesses with unknown revenues. Under the PPP, banks were not required to collect revenue data since the intent of the PPP is to assist businesses retain workers and staff during the economic hardship resulting from the pandemic. Therefore, these unique circumstances will be considered in this evaluation. Genoa's performance was compared to the percentage of businesses (proxy).

In 2021, Genoa originated 181 small business loans to businesses of different sizes totaling \$58.4 million. Of these loans, 107 (59.1%) were extended to businesses with unknown revenues, and three (1.7%) of these loans totaling \$590,000 were PPP loans.

Distribution of 2021 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Toledo, OH MSA #45780					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	42	23.2	8,244	14.1	89.2
<b>Over \$1 Million</b>	32	17.7	9,155	15.7	9.8
<b>Revenue Unknown</b>	107	59.1	40,987	70.2	1.0
<b>Total</b>	181	100.0	58,385	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	89	49.2	4,441	7.6	
<b>\$100,001 - \$250,000</b>	35	19.3	5,751	9.9	
<b>\$250,001 - \$1 Million</b>	48	26.5	24,837	42.5	
<b>Total</b>	181	100.0	58,385	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	26	61.9	1,305	15.8	
<b>\$100,001 - \$250,000</b>	6	14.3	890	10.8	
<b>\$250,001 - \$1 Million</b>	10	23.8	6,049	73.4	
<b>Total</b>	42	100.0	8,244	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Genoa originated 42 (23.2%) loans totaling \$8.2 million that were originated to businesses with revenues of \$1.0 million or less compared to the percentage of small businesses in the AA at 89.2%. While the penetration to small businesses is poor, this analysis is skewed by the large number of businesses with unknown gross annual revenues. However, Genoa also originated 89 (49.2%) of its small-dollar loans in amounts of \$100,000 or less.

In 2020, Genoa originated 1,271 small business loans to businesses of different sizes totaling \$89.3 million. Of these loans 1,238 (97.4%) of these loans were extended to businesses with unknown revenues, and 1,187 (93.4%) of these loans totaling \$67.5 million were PPP loans.

Distribution of 2020 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Toledo, OH MSA #45780					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	15	1.2	1,710	1.9	89.0
<b>Over \$1 Million</b>	18	1.4	5,750	6.4	10.1
<b>Revenue Unknown</b>	1,238	97.4	81,790	91.6	0.9
<b>Total</b>	1,271	100.0	89,250	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	1,085	85.4	25,974	29.1	
<b>\$100,001 - \$250,000</b>	114	9.0	17,127	19.2	
<b>\$250,001 - \$1 Million</b>	58	4.6	26,468	29.7	
<b>Total</b>	1,271	100.0	89,250	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	9	60.0	543	31.8	
<b>\$100,001 - \$250,000</b>	4	26.7	482	28.2	
<b>\$250,001 - \$1 Million</b>	2	13.3	685	40.1	
<b>Total</b>	15	100.0	1,710	100.0	
<i>Source: 2020 FFIEC Census Data 2020 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Genoa originated 15 (1.2%) loans totaling \$1.7 million that were originated to businesses with revenues of \$1.0 million or less, compared to the percentage of small businesses at 89.0%. While the penetration to small businesses is poor, this analysis is skewed by the large number of businesses with unknown gross annual revenues. However, Genoa also originated 85.4% of its small-dollar loans in amounts of \$100,000 or less.

Overall, Genoa’s willingness to lend in smaller amounts exhibits good responsiveness to credit needs of businesses in the AA, since small-dollar loans tend to represent amounts typically requested by small businesses, particularly small businesses impacted by the COVID-19 emergency. The need for access to capital, especially for small businesses, is critical for new businesses and existing businesses to expand. Considering these factors, Genoa’s distribution to businesses of different sizes is reasonable.

### Consumer Lending

During the evaluation period, Genoa originated 406 consumer loans totaling \$17.9 million. Genoa’s performance was compared to the percentage of households by household income (proxy). Borrower distribution of motor vehicle and other unsecured loans is excellent and reasonable for other secured loans.

Distribution of 2021 Consumer Loans by Borrower Income Level					
Assessment Area: Toledo, OH MSA #45780					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	##%	\$(000)	%	
<b>Credit Cards</b>					
<b>Motor Vehicle Loans</b>					
Low	41	15.1	526	8.1	26.2
Moderate	83	30.6	1,711	26.4	15.5
Middle	69	25.5	1,767	27.3	16.2
Upper	61	22.5	2,039	31.5	42.1
Unknown	17	6.3	428	6.6	0.0
<b>Total</b>	<b>271</b>	<b>100.0</b>	<b>6,472</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Secured Loans</b>					
Low	7	9.7	107	1.0	26.2
Moderate	19	26.4	345	3.2	15.5
Middle	12	16.7	328	3.0	16.2
Upper	18	25.0	2,423	22.4	42.1
Unknown	16	22.2	7,598	70.3	0.0
<b>Total</b>	<b>72</b>	<b>100.0</b>	<b>10,802</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Unsecured Loans</b>					
Low	9	14.3	62	9.5	26.2
Moderate	21	33.3	188	28.8	15.5
Middle	14	22.2	137	21.0	16.2
Upper	12	19.0	185	28.4	42.1
Unknown	7	11.1	80	12.3	0.0
<b>Total</b>	<b>63</b>	<b>100.0</b>	<b>652</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Consumer Loans</b>					
Low	57	14.0	695	3.9	26.2
Moderate	123	30.3	2,244	12.5	15.5
Middle	95	23.4	2,232	12.5	16.2
Upper	91	22.4	4,647	25.9	42.1
Unknown	40	9.9	8,106	45.2	0.0
<b>Total</b>	<b>406</b>	<b>100.0</b>	<b>17,926</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data					
2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

### Motor Vehicle Lending

Genoa originated 271 motor vehicle loans totaling \$6.5 million. Genoa also originated 17 (6.3%) motor vehicle loans to borrowers with unknown-income designations. Genoa originated 41 (15.1%) motor vehicle loans to low-income borrowers, which was below the percentage of households at 26.2%. The bank originated 83 (30.6%) motor vehicle loans to moderate-income borrowers, which significantly exceeded the percentage of households at 15.5%.

Genoa’s borrower distribution of motor vehicle loans to low-income borrowers is reasonable and excellent to moderate-income borrowers. Access to transportation is essential for improving upward social mobility for lower-income individuals and communities.

*Other Secured Lending*

Genoa originated 72 other secured loans totaling \$10.8 million. Genoa also originated 16 (22.2%) other secured loans to borrowers with unknown-income designations. Genoa originated seven (9.7%) other secured loans to low-income borrowers, which was significantly below the percentage of households at 26.2%. The bank originated 19 (26.4%) other secured loans to moderate-income borrowers, which exceeded the percentage of households at 15.5%.

Genoa’s borrower distribution of other secured loans to low-income borrowers is poor and excellent to moderate-income borrowers.

*Other Unsecured Lending*

Genoa originated 63 other unsecured loans totaling \$652,000. Genoa also originated seven (11.1%) other unsecured loans to borrowers with unknown-income designations. Genoa originated nine (14.3%) other unsecured loans to low-income borrowers, which was below the percentage of households at 26.2%. The bank originated 21 (33.3%) other unsecured loans to moderate-income borrowers, which exceeded the percentage of households at 15.5%.

Genoa’s borrower distribution of other unsecured loans to low-income borrowers is reasonable and excellent to moderate-income borrowers, considering access to unsecured small-dollar loans gives LMI individuals the ability to have access to smaller amounts of money to pay for items/services they could not otherwise afford.

Home Equity Lines of Credit

During the evaluation period, Genoa originated 116 home equity lines of credit totaling \$8.7 million; eight (6.9%) home equity lines of credit were originated to borrowers with unknown incomes. Genoa’s performance was compared to the percentage of families (proxy). Genoa’s borrower distribution of home equity lines of credit is reasonable.

<b>Distribution of 2021 Home Equity Lines of Credit by Borrower Income Level</b>					
<b>Assessment Area: Toledo, OH MSA #45780</b>					
<b>Borrower Income Level</b>	<b>Bank Loans</b>				<b>Families by Family Income %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Low</b>	15	12.9	1,090	12.5	23.2
<b>Moderate</b>	22	19.0	1,366	15.7	16.6
<b>Middle</b>	24	20.7	1,417	16.3	19.6
<b>Upper</b>	47	40.5	4,211	48.3	40.6
<b>Unknown</b>	8	6.9	631	7.2	0.0
<b>Total</b>	116	100.0	8,715	100.0	100.0
<i>Source: 2021 FFIEC Census Data            2011-2015 U.S. Census Bureau: American Community Survey            Note: Percentages may not total 100.0 percent due to rounding.</i>					

Genoa originated 15 (12.9%) home equity lines of credit to low-income borrowers, which was below the percentage of families at 23.2%. The bank originated 22 (19.0%) home equity lines of credit to moderate-income borrowers, which exceeded the percentage of families at 16.6%.

Considering the bank’s performance relative to proxy, the borrower distribution of home equity lines of credit to low-income borrowers is reasonable and moderate-income borrowers is excellent.

Small Farm Lending

During the evaluation period, Genoa originated 77 small farm loans to farms of different sizes totaling \$11.0 million, and 22 (71.0%) totaling \$603,000 were PPP loans. Thirty-one (40.3%) totaling \$2.0 million were extended to small farms with unknown revenues. Genoa’s performance was compared to the percentage of farms (proxy).

In 2021, Genoa originated 34 loans to farms of different sizes totaling \$5.4 million. Of these loans, six (17.6%) were extended to small farms with unknown revenues.

<b>Distribution of 2021 Small Farm Lending by Revenue Size of Farms</b>					
<b>Assessment Area: Toledo, OH MSA #45780</b>					
	<b>Bank Loans</b>				<b>Total Farms %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	26	76.5	4,157	77.5	96.5
<b>Over \$1 Million</b>	2	5.9	400	7.5	2.6
<b>Revenue Unknown</b>	6	17.6	807	15.0	0.9
<b>Total</b>	34	100.0	5,364	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	20	58.8	894	16.7	
<b>\$100,001 - \$250,000</b>	7	20.6	1,054	19.6	
<b>\$250,001 - \$500,000</b>	6	17.6	2,002	37.3	
<b>Total</b>	34	100.0	5,364	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	16	61.5	621	14.9	
<b>\$100,001 - \$250,000</b>	5	19.2	738	17.8	
<b>\$250,001 - \$500,000</b>	4	15.4	1,384	33.3	
<b>Total</b>	26	100.0	4,157	100.0	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Genoa originated 26 (76.5%) loans totaling \$4.2 million to farms with revenues of \$1.0 million or less, compared to the percentage of small farms at 96.5%. While the penetration to small farms is poor, this analysis is skewed by the large number of farms with unknown gross annual revenues.

However, Genoa also originated 20 (58.8%) of its small-dollar loans in amounts of \$100,000 or less. Genoa’s willingness to lend in smaller amounts exhibits an adequate responsiveness to credit needs of farms in the AA, since small-dollar loans tend to represent amounts typically requested by small farms. The need for access to capital, especially for small farms, is critical for new and existing farms to remain viable. Considering these factors, Genoa’s distribution to farms of different sizes is reasonable.

In 2020, Genoa originated 43 loans to farms of different sizes totaling \$5.6 million. Of these loans, 25 (58.1%) were extended to small farms with unknown revenues and 22 (51.2%) of these loans totaling \$603,000 were PPP loans.

Distribution of 2020 Small Farm Lending by Revenue Size of Farms					
Assessment Area: Toledo, OH MSA #45780					
	Bank Loans				Total Farms %
	#	#%	\$(000)	%	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	17	39.5	4,311	76.8	96.4
<b>Over \$1 Million</b>	1	2.3	86	1.5	2.5
<b>Revenue Unknown</b>	25	58.1	1,213	21.6	1.1
<b>Total</b>	43	100.0	5,610	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	31	72.1	1,016	18.1	
<b>\$100,001 - \$250,000</b>	7	16.3	1,275	22.7	
<b>\$250,001 - \$500,000</b>	3	7.0	1,134	20.2	
<b>Total</b>	43	100.0	5,610	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	7	41.2	285	6.6	
<b>\$100,001 - \$250,000</b>	6	35.3	1,068	24.8	
<b>\$250,001 - \$500,000</b>	2	11.8	774	18.0	
<b>Total</b>	17	100.0	4,311	100.0	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Genoa originated 17 (39.5%) loans totaling \$4.3 million to farms with revenue of \$1.0 million or less compared to the percentage of small farms at 96.4%. While the penetration to small farms is poor, this analysis is skewed by the large number of farms with unknown gross annual revenues. However, Genoa also originated 31 (72.1%) of its small-dollar loans in amounts of \$100,000 or less. Genoa’s willingness to lend in smaller amounts exhibits good responsiveness to credit needs of farms in the AA, since small-dollar loans tend to represent amounts typically requested by small farms. The need for access to capital, especially for small farms, is critical for new and existing farms to remain viable. Considering these factors, Genoa’s distribution to farms of different sizes is reasonable.



**Geographic Distribution of Loans**

The geographic distribution of HMDA, small business, consumer, and home equity lines of credit is poor and adequate for small farm loans, with a moderate level of lending gaps.

Tract Income Level	Percentage of Lending Penetration					
	Second Half 2016	2017	2018	2019	2020	2021
Low	7.4%	13.9%	8.3%	16.7%	72.2%	38.9%
Moderate	13.3%	55.6%	40.7%	40.7%	77.8%	81.5%
Middle	53.7%	74.2%	77.4%	83.1%	98.5%	90.8%
Upper	77.3%	86.0%	83.7%	85.0%	100.0%	100.0%
Unknown	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>44.7%</b>	<b>60.6%</b>	<b>57.6%</b>	<b>61.8%</b>	<b>88.8%</b>	<b>79.4%</b>

From 2017 through 2021, Genoa was able to penetrate nearly 70.0% of its total tracts and 30.0% of its low- and 59.0% of its moderate-income tracts. Because the rate of owner-occupied housing is less than 26.0% in low- and 45.0% in moderate-income tracts, lending opportunities in these tracts, particularly low-income tracts, is likely to be limited. In 2020 and 2021, the years with the most loans, Genoa was able to penetrate 84.0% of its total tracts and nearly 56.0% of its low- and 80.0% of its moderate-income tracts. The improved penetration rate can be attributed to the increase of small business loans through the PPP and a slight increase in HMDA loans. Lastly, while Genoa competes with several large national and regional financial institutions in this market, it has the capacity to originate loans across its delineated AA. For example, Genoa ranked fifth out of 96 HMDA reporters in the MSA in 2020.

HMDA Lending

During the evaluation period, Genoa originated 3,264 HMDA loans totaling \$593.4 million. Genoa’s performance was compared to the percentage of owner-occupied units (proxy) and the aggregate of all lenders. Genoa’s geographic distribution of home purchase, refinance, and home improvement loans is poor.

*Home Purchase Lending*

In 2021, Genoa originated 320 home purchase loans totaling \$75.3 million. Genoa originated three (0.9%) home purchase loans in low-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 6.7% and the aggregate of all lenders at 2.7%. Genoa originated six (1.9%) home purchase loans in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 11.8% and the aggregate of all lenders at 9.5%.

In 2020, Genoa originated 317 home purchase loans totaling \$70.6 million. Genoa originated two (0.6%) home purchase loans in low-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 6.7% and the aggregate of all lenders at 2.0%. Genoa originated seven (2.2%) home purchase loans in moderate-income tracts, which was significantly

below the percentage of owner-occupied units in these tracts at 11.8% and the aggregate of all lenders at 2.2%.

In 2019, Genoa originated 307 home purchase loans totaling \$60.8 million. Genoa originated one (0.3%) home purchase loan in a low-income tract, which was significantly below the percentage of owner-occupied units in these tracts at 6.7% and the aggregate of all lenders at 1.9%. Genoa originated 13 (4.2%) home purchase loans in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 11.8% and below the aggregate of all lenders at 8.2%.

In 2018, Genoa originated 289 home purchase loans totaling \$49.8 million. Genoa originated two (0.7%) home purchase loans in low-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 6.7% and the aggregate of all lenders at 2.0%. Genoa originated 11 (3.8%) home purchase loans in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 11.8% and the aggregate of all lenders at 8.7%.

In 2017, Genoa originated 240 home purchase loans totaling \$40.8 million. Genoa originated two (0.8%) home purchase loans in low-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 6.7% and the aggregate of all lenders at 2.2%. Genoa originated 12 (5.0%) home purchase loans in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 11.8% and below the aggregate of all lenders at 8.0%.

In 2016, Genoa originated 122 home purchase loans totaling \$20.0 million. Genoa originated two (1.6%) home purchase loans in low-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 5.7% and exceeded the aggregate of all lenders at 1.0%. Genoa originated no home purchase loans in moderate-income tracts, compared to the percentage of owner-occupied units in these tracts at 12.6% and the aggregate of all lenders at 6.7%.

Given Genoa's performance consistently fell significantly below proxy and the aggregate of all lenders, geographic distribution of home purchase loans in LMI tracts is poor.

#### *Refinance Lending*

In 2021, Genoa originated 359 refinance loans totaling \$65.7 million. Genoa originated no refinance loans in low-income tracts, compared to the percentage of owner-occupied units in these tracts at 6.7% and the aggregate of all lenders at 1.2%. Genoa originated seven (1.9%) refinance loans in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 11.8% and the aggregate of all lenders at 5.7%.

In 2020, Genoa originated 592 refinance loans totaling \$118.9 million. Genoa originated two (0.3%) refinance loans in low-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 6.7% and the aggregate of all lenders at 0.8%. Genoa originated nine (1.5%) refinance loans in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 11.8% and the aggregate of all lenders at 4.0%.

In 2019, Genoa originated 171 refinance loans totaling \$34.2 million. Genoa originated two (1.2%) refinance loans in low-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 6.7%, but exceeded the aggregate of all lenders at 1.1%. Genoa originated three (1.8%) refinance loans in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 11.8% and the aggregate of all lenders at 5.5%.

In 2018, Genoa originated 88 refinance loans totaling \$11.9 million. Genoa originated two (2.3%) refinance loans in low-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 6.7% and exceeded the aggregate of all lenders at 1.9%. Genoa originated two (2.3%) refinance loans in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 11.8% and the aggregate of all lenders at 7.2%.

In 2017, Genoa originated 99 refinance loans totaling \$13.8 million. Genoa originated no refinance loans in low-income tracts compared to the percentage of owner-occupied units in these tracts at 6.7% and the aggregate of all lenders at 2.0%. Genoa originated two (2.0%) refinance loans in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 11.8% and the aggregate of all lenders at 7.9%.

In 2016, Genoa originated 85 refinance loans totaling \$12.8 million. Genoa originated no refinance loans in low-income tracts compared to the percentage of owner-occupied units in these tracts at 5.7% and the aggregate of all lenders at 1.0%. Genoa originated four (4.7%) refinance loans in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 12.6% and below the aggregate of all lenders at 6.4%.

Given Genoa's performance mostly fell significantly below proxy and the aggregate of all lenders, geographic distribution of refinance loans in LMI tracts is poor.

#### *Home Improvement Lending*

In 2019, Genoa originated 27 home improvement loans totaling \$1.2 million. Genoa originated one (3.7%) home improvement loan in a low-income tract, which was below the percentage of owner-occupied units in these tracts at 6.7% and exceeded the aggregate of all lenders at 1.9%. Genoa originated no home improvement loans in moderate-income tracts compared to the percentage of owner-occupied units in these tracts at 11.8% and the aggregate of all lenders at

7.3%.

In 2017, Genoa originated 61 home improvement loans totaling \$2.3 million. Genoa originated two (3.3%) home improvement loans in low-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 6.7% and the aggregate of all lenders at 7.6%. Genoa originated four (6.6%) home improvement loans in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 11.8% and the aggregate of all lenders at 11.4%.

In 2016, Genoa originated 26 home improvement loans totaling \$1.2 million. Genoa originated no home improvement loans in low-income tracts compared to the percentage of owner-occupied units in these tracts at 5.7% and the aggregate of all lenders at 4.3%. Genoa originated no home improvement loans in moderate-income tracts compared to the percentage of owner-occupied units in these tracts at 12.6% and the aggregate of all lenders at 11.0%.

Given performance mostly fell significantly below proxy and the aggregate of all lenders, geographic distribution of home improvement loans in LMI tracts is poor.

Small Business Lending

During the evaluation period, Genoa originated 1,452 small business loans totaling \$147.6 million. Genoa’s performance was compared to the percentage of businesses by income-level (proxy). Genoa’s overall geographic distribution of small business lending is poor.

Distribution of 2021 Small Business Lending by Income Level of Geography					
Assessment Area: Toledo, OH MSA #45780					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	9	5.0	1,284	2.2	12.5
Moderate	5	2.8	289	0.5	10.5
Middle	114	63.0	32,787	56.2	38.9
Upper	53	29.3	24,025	41.1	38.0
<b>Total</b>	<b>181</b>	<b>100.0</b>	<b>58,385</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

In 2021, Genoa originated 181 small business loans totaling \$58.4 million. Genoa originated nine (5.0%) small business loans in low-income tracts, which was significantly below the percentage of businesses in these tracts at 12.5%. Genoa originated five (2.8%) small business loans in moderate-income tracts, which was significantly below the percentage of business in these tracts at 10.5%. The geographic distribution of small business loans in LMI tracts is poor.

Distribution of 2020 Small Business Lending by Income Level of Geography					
Assessment Area: Toledo, OH MSA #45780					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
<b>Low</b>	70	5.5	7,926	8.9	12.3
<b>Moderate</b>	41	3.2	3,420	3.8	10.1
<b>Middle</b>	626	49.3	39,299	44.0	39.0
<b>Upper</b>	534	42.0	38,606	43.3	38.5
<b>Total</b>	1,271	100.0	89,250	100.0	100.0
<i>Source: 2020 FFIEC Census Data 2020 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

In 2020, Genoa originated 1,271 small business loans totaling \$89.3 million. Genoa originated 70 (5.5%) small business loans in low-income tracts, which was below the percentage of businesses in these tracts at 12.3%. Genoa originated 41 (3.2%) small business loans in moderate-income tracts, which was significantly below the percentage of business in these tracts at 10.1%. Geographic distribution of small business loans in LMI tracts is poor.

### Consumer Lending

During the evaluation period, Genoa originated 406 consumer loans totaling \$17.9 million. Genoa's performance was compared to the percentage of households by tract income (proxy). Genoa's overall geographic distribution of motor vehicle and other secured is poor and reasonable for other unsecured loans.

Distribution of 2021 Consumer Loans by Income Level of Geography					
Assessment Area: Toledo, OH MSA #45780					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	\$%	
<b>Motor Vehicle Loans</b>					
Low	7	2.6	153	2.4	12.8
Moderate	15	5.5	340	5.3	14.8
Middle	153	56.5	3,385	52.3	42.9
Upper	96	35.4	2,595	40.1	29.5
<b>Total</b>	<b>271</b>	<b>100.0</b>	<b>6,472</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Secured Loans</b>					
Low	1	1.4	25	0.2	12.8
Moderate	6	8.3	1,521	14.1	14.8
Middle	37	51.4	2,670	24.7	42.9
Upper	28	38.9	6,585	61.0	29.5
<b>Total</b>	<b>72</b>	<b>100.0</b>	<b>10,802</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Unsecured Loans</b>					
Low	0	0.0	0	0.0	12.8
Moderate	8	12.7	56	8.6	14.8
Middle	35	55.6	403	61.8	42.9
Upper	20	31.7	193	29.6	29.5
<b>Total</b>	<b>63</b>	<b>100.0</b>	<b>652</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Consumer Loans</b>					
Low	8	2.0	178	1.0	12.8
Moderate	29	7.1	1,917	10.7	14.8
Middle	225	55.4	6,458	36.0	42.9
Upper	144	35.5	9,373	52.3	29.5
<b>Total</b>	<b>406</b>	<b>100.0</b>	<b>17,926</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data					
2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

### Motor Vehicle Lending

Genoa originated 271 motor vehicle loans totaling \$6.5 million. Genoa originated seven (2.6%) motor vehicle loans in low-income tracts, which was significantly below the percentage of households in these tracts at 12.8%. Genoa originated 15 (5.5%) motor vehicle loans in moderate-income tracts, which was significantly below the percentage of households in these tracts at 14.8%.

Considering the low percentage of population and households in LMI tracts, which may limit the bank's opportunities to make consumer loans in these tracts, the geographic distribution of motor vehicle lending in LMI tracts is poor.

*Other Secured Lending*

Genoa originated 72 other secured loans totaling \$10.8 million. Genoa originated one (1.4%) other secured loan in low-income tracts, which was significantly below the percentage of households in these tracts at 12.8%. Genoa originated six (8.3%) other secured loans in moderate-income tracts, which was significantly below proxy at 14.8%.

Considering the low percentage of households in LMI tracts, which may limit the bank’s opportunities to make consumer loans in these tracts, geographic distribution of other secured lending in LMI tracts is poor.

*Other Unsecured Lending*

Genoa originated 63 other unsecured loans totaling \$652,000. Genoa originated no other unsecured loans in low-income tracts, compared to the percentage of households in these tracts at 12.8%. Genoa originated eight (12.7%) other unsecured loans in moderate-income tracts, which was below proxy at 14.8%.

Considering the low percentage of households in LMI tracts, which may limit the bank’s opportunities to make consumer loans in these tracts, geographic distribution of other unsecured lending in low-income tracts is poor and reasonable in moderate-income tracts.

Home Equity Lines of Credit

During the evaluation period, Genoa originated 116 home equity lines of credit totaling \$8.7 million. Genoa’s performance was compared to the percentage of owner-occupied units (proxy). Genoa’s overall geographic distribution of home equity lines of credit is poor.

<b>Distribution of 2021 Home Equity Lines of Credit by Income Level of Geography</b>					
<b>Assessment Area: Toledo, OH #45780</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Owner Occupied Units %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>Low</b>	1	0.9	32	0.4	6.7
<b>Moderate</b>	2	1.7	78	0.9	11.8
<b>Middle</b>	55	47.4	3,320	38.1	45.4
<b>Upper</b>	58	50.0	5,286	60.7	36.1
<b>Total</b>	116	100.0	8,715	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Genoa originated one (0.9%) home equity line of credit in low-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 6.7%. Genoa originated two (1.7%) home equity lines of credit in moderate-income tracts, which was significantly below the percentage of owner-occupied units in these tracts at 11.8%.

The geographic distribution of home equity lines of credit in LMI tracts is poor, considering performance fell significantly below proxy.

Small Farm Lending

During the evaluation period, Genoa originated 77 small farm loans totaling \$11.0 million. Genoa’s performance was compared to the percentage of farms by income-level (proxy). Genoa’s overall geographic distribution of small farm lending is reasonable.

<b>Distribution of 2021 Small Farm Lending by Income Level of Geography</b>					
<b>Assessment Area: Toledo, OH MSA #45780</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Farms %</b>
	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Low</b>	0	0.0	0	0.0	2.1
<b>Moderate</b>	0	0.0	0	0.0	1.9
<b>Middle</b>	20	58.8	3,750	69.9	49.2
<b>Upper</b>	14	41.2	1,615	30.1	46.8
<b>Total</b>	34	100.0	5,364	100.0	100.0
<i>Source: 2021 FFIEC Census Data            2021 Dun &amp; Bradstreet Data            2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

<b>Distribution of 2020 Small Farm Lending by Income Level of Geography</b>					
<b>Assessment Area: Toledo, OH MSA #45780</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Farms %</b>
	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Low</b>	0	0.0	0	0.0	2.0
<b>Moderate</b>	0	0.0	0	0.0	1.8
<b>Middle</b>	19	44.2	2,354	42.0	50.0
<b>Upper</b>	24	55.8	3,256	58.0	46.2
<b>Total</b>	43	100.0	5,610	100.0	100.0
<i>Source: 2020 FFIEC Census Data            2020 Dun &amp; Bradstreet Data            2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					



In 2021 and 2020, Genoa originated no small farm loans in LMI tracts; however, there is a very limited number of small farms in these tracts. Therefore, geographic distribution of small farm loans in LMI tracts is reasonable.

### **Response to Complaints**

There were no CRA-related complaints filed against the bank since the previous CRA evaluation.

### **COMMUNITY DEVELOPMENT TEST**

Genoa's community development performance demonstrates an adequate responsiveness to community development needs in this AA by providing community development loans, qualified investments and donations, and community development services, considering Genoa's capacity and opportunities in this AA.

#### ***Community Development Lending***

During the evaluation period, Genoa originated a commercial mortgage purchase loan totaling \$112,000 to a substance abuse and mental health facility in a moderate-income area. The loan helped the organization purchase several properties to provide transitional housing for individuals and families in recovery. This loan resulted in the creation and retention of at least six permanent jobs contributing to the revitalization and stabilization of a moderate-income area.

#### ***Community Development Investments***

Qualified community development investments consisted of small-dollar donations. Genoa made 61 donations totaling \$39,716 to 36 organizations during this evaluation period. The following table shows the total number of qualified donations by purpose, number and dollar amount.

<b>Purpose of Qualified Donation</b>	<b>#</b>	<b>\$</b>
Services to LMI Individuals	53	\$34,966
Affordable Housing	4	\$2,850
Economic Development	2	\$1,500
Revitalization/Stabilization	2	\$400
<b>Total</b>	<b>61</b>	<b>\$39,716</b>

Most of these small-dollar contributions supported organizations that provide a multitude of community services, including, but not limited to, supporting food banks, wraparound services for LMI individuals and families, local chambers of commerce, creation of green space in a disenfranchised neighborhood, LMI women's economic advancement, and social and educational outings for LMI children. Genoa also donated check registers to a school that

primarily serves LMI students so they could learn to budget and balance their checking accounts.

The largest donations ranging from \$4,000 to \$1,000, supported the elimination of housing discrimination, building affordable housing, and mentorship of future entrepreneurs.

*Community Development Services*

During the evaluation period, 36 bank officers and employees provided leadership and financial and technical expertise to 67 organizations with a community development purpose. The following tables shows the total number of services, organizations, and employees by purpose.

<b>Purpose of CD Service</b>	<b># of Services</b>	<b># of Orgs</b>	<b># of Employees</b>
Economic Development	52	33	15
Services to LMI Individuals	33	31	18
Revitalization/Stabilization	3	3	3
<b>Total</b>	<b>88</b>	<b>67</b>	<b>36*</b>

*\*Several employees may be double counted because they provided multiple CD services*

The majority of services provided leadership and financial expertise through board and committee membership to organizations that address strategies to encourage economic development and sustainability of the farm and food community; promotion of services to LMI individuals and families; and revitalization and stabilization of LMI areas, including working with the Lucas County land bank to provide low-cost home improvement loans at a discounted interest rate to qualified borrowers. Technical expertise included providing several non-profits with budgeting, fundraising, setting scholarship selection criteria, and conducting needs assessments to determine if individuals qualify for services on a sliding scale.

Nineteen employees conducted financial literacy training sessions during the evaluation period. Because of the COVID-19 pandemic, Genoa did not conduct in-person workshops or financial literacy training at schools in 2020 or 2021. Below are examples of workshops and financial literacy training provided prior to the pandemic:

- Genoa partnered with Genoa Financial and a local farmer to host a free agricultural workshop to showcase commitment in preserving, protecting, and financing local family farms. This workshop discussed wealth planning and trust services, as well as national and regional trends in farming. Approximately 70 individuals attended.
- Genoa partnered with a local law firm to host a complimentary breakfast workshop for local farmers to educate and offer advice on financial and legal topics necessary for protecting a family farm business. The topics included how to utilize LLCs and trusts for asset protection, the long-term care costs of protecting a farm, nutrient control, and insurance coverage. Approximately 15 individuals attended.

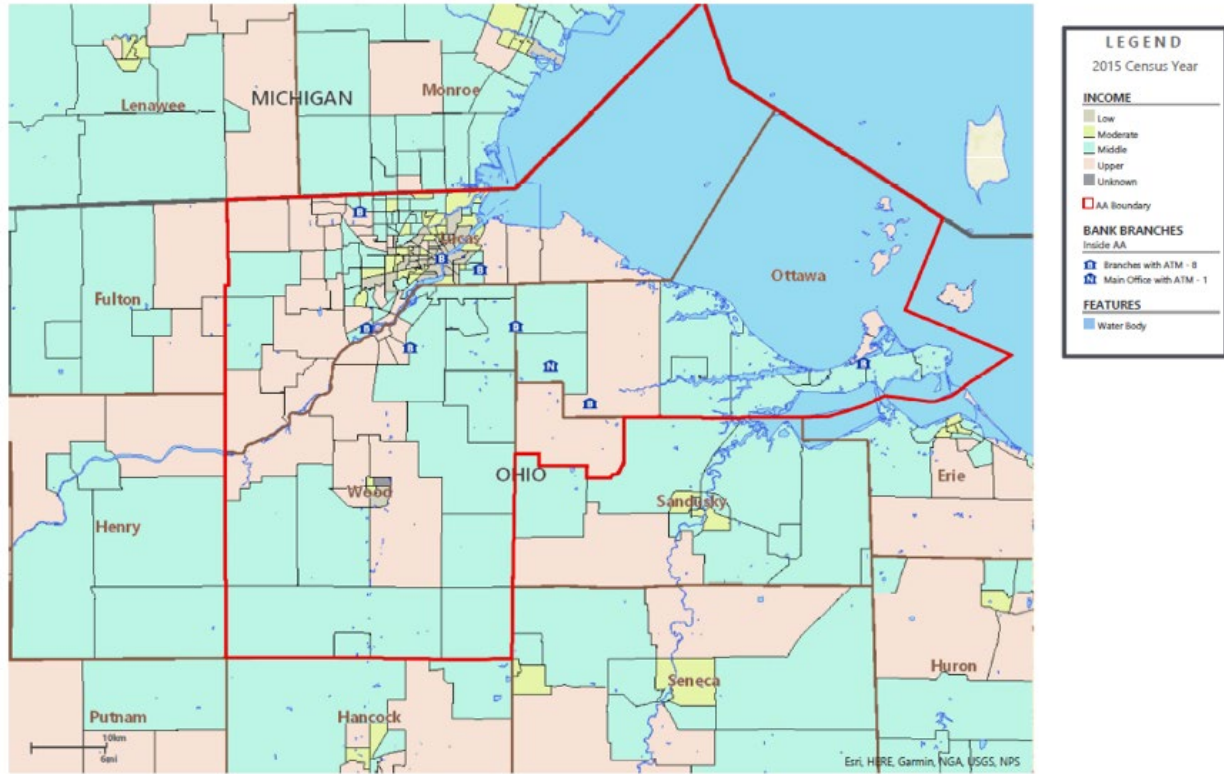
- Genoa hosted a credit repair seminar for potential first-time homebuyers to better understand credit scores, credit reports, and how to improve their credit scores. Approximately 15 people attended.
- Genoa participated in a Starting a Small Business in a Small-Town workshop hosted by the Genoa Economic Development Center to educate prospective small business owners what it takes to start a small business or franchise. Genoa offered expertise and insight as a small business lender.
- Genoa offered a free credit, mortgage workshop at its Downtown Toledo Branch to help LMI first-time homebuyers understand the mortgage approval process. Approximately 12 individuals attended.
- Real Money, Real World is a hands-on financial literacy program that gives junior high and high school students the opportunity to make lifestyle and budget choices like those they will make as adults. At least annually five to seven employees participate in this program and these events can reach over 550 students.

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

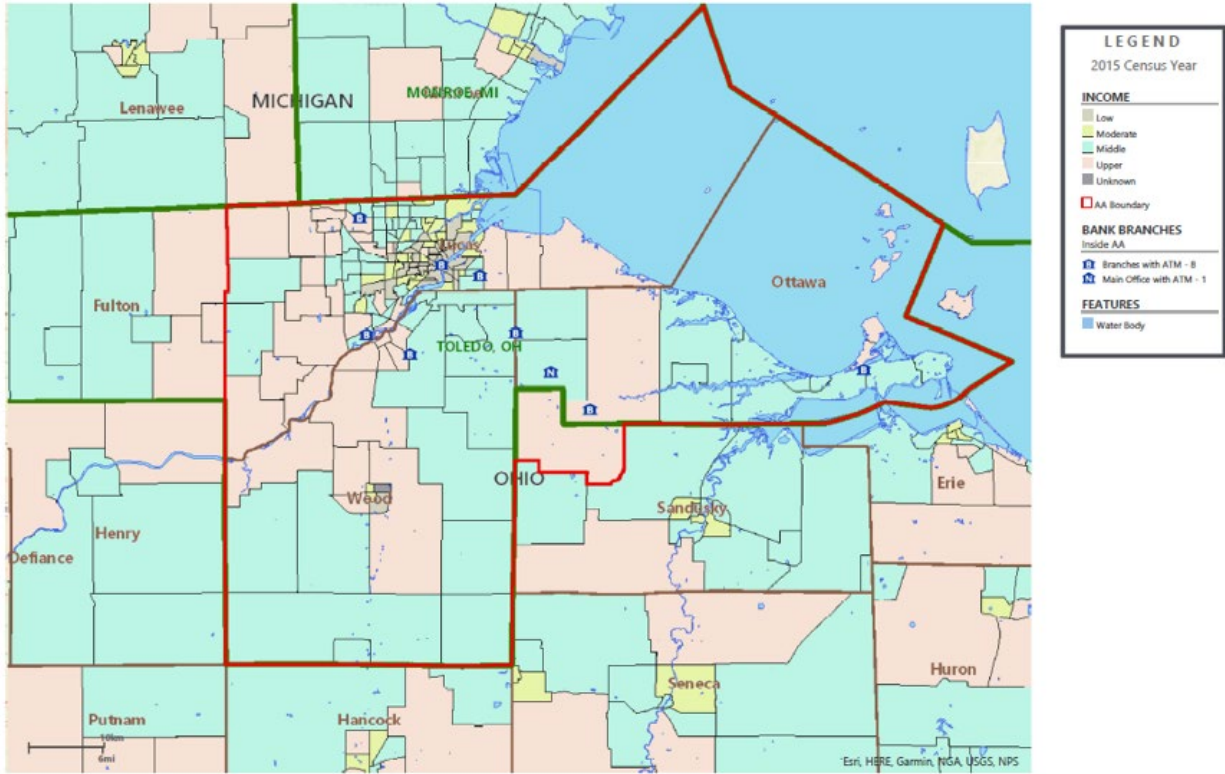
An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – MAPS OF THE ASSESSMENT AREA

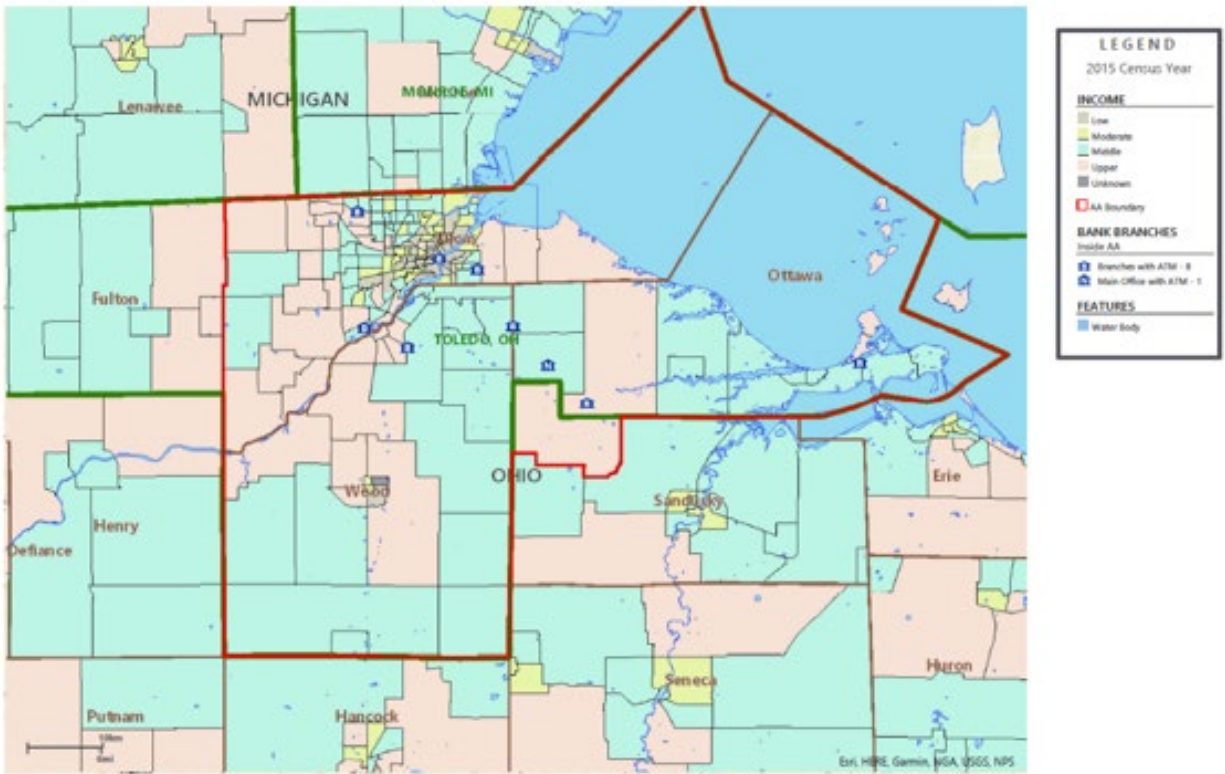
Assessment Area: 2021 Toledo, OH MSA #45780



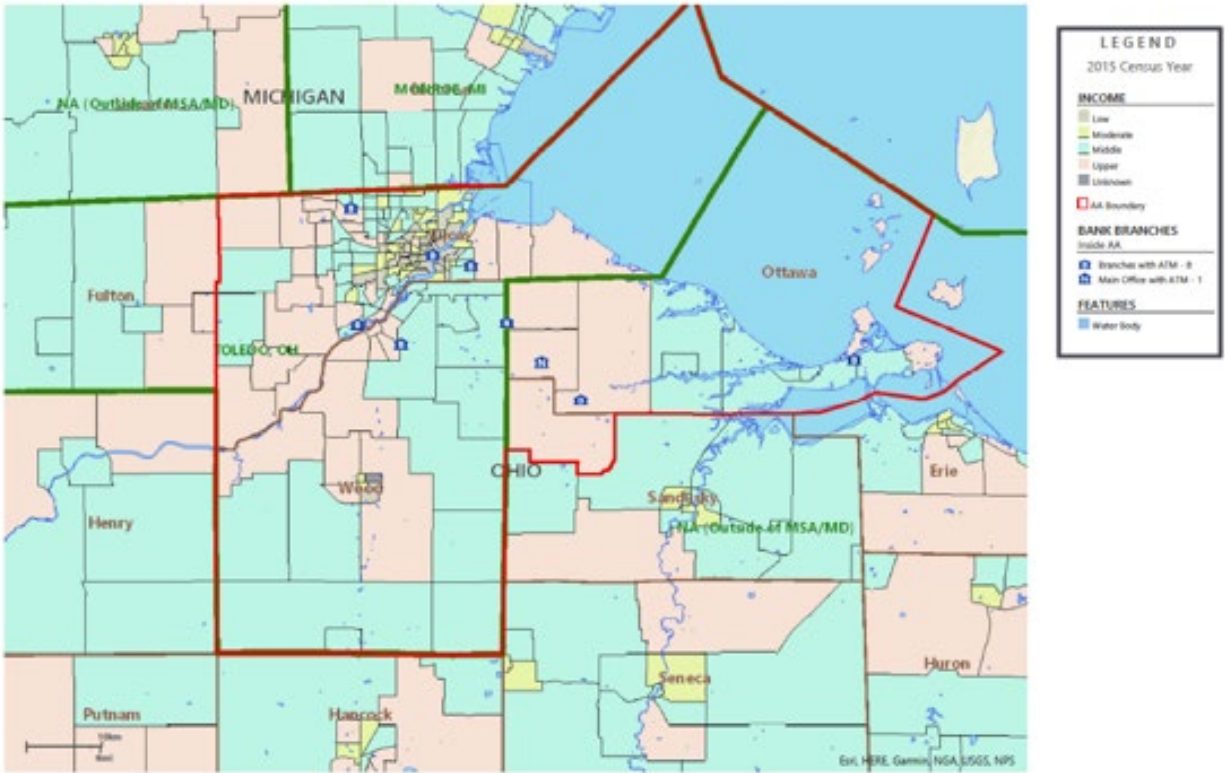
Assessment Area: 2020 Toledo, OH MSA #45780



Assessment Area: 2019 Toledo, OH MSA #45780

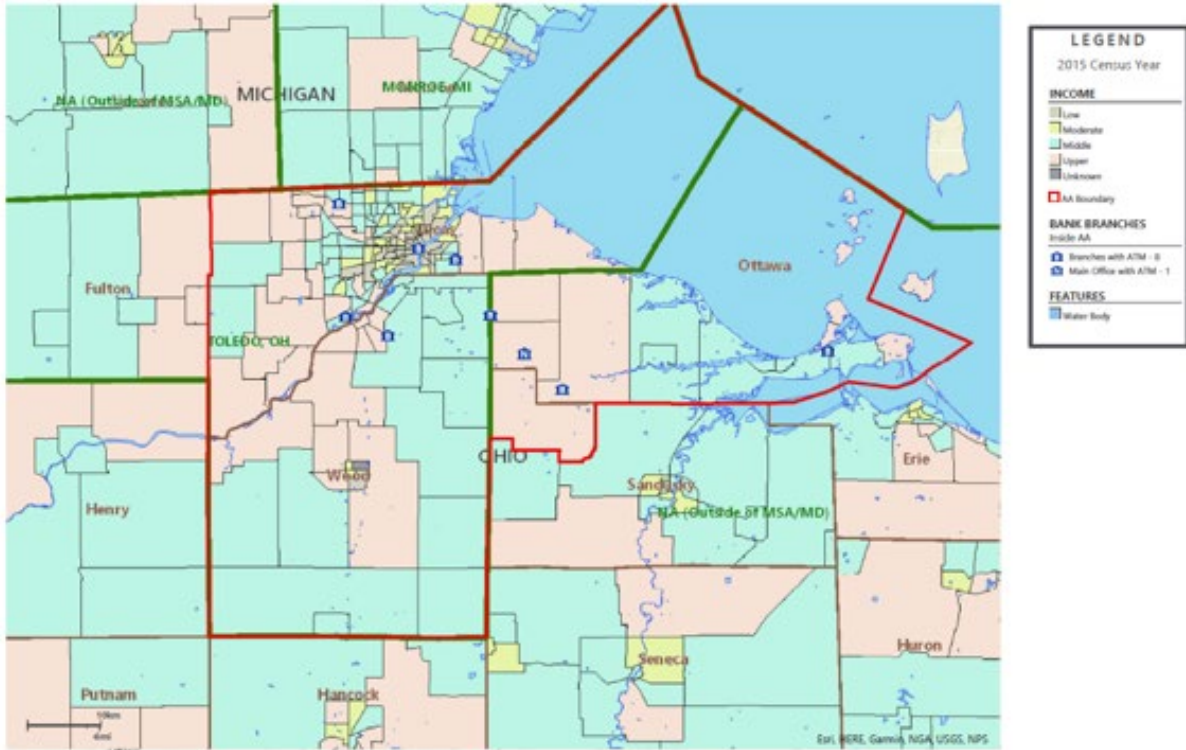


Assessment Area: 2018 Toledo, OH MSA #45780

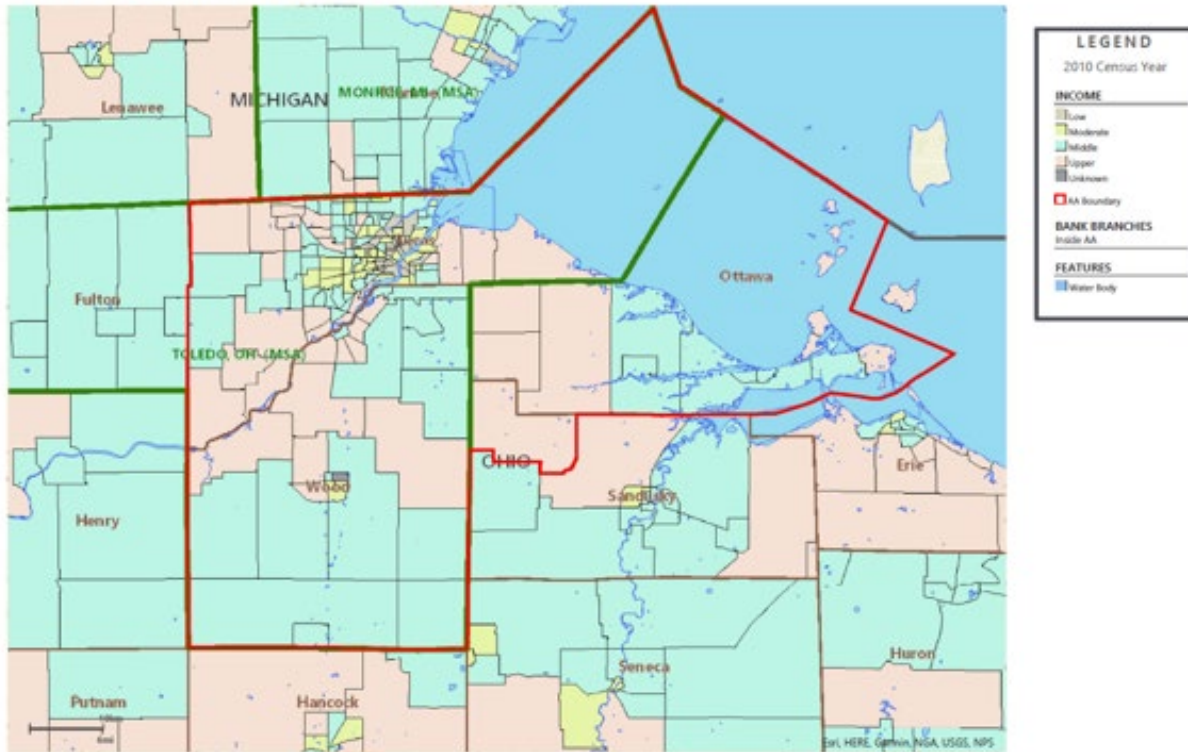




Assessment Area: 2017 Toledo, OH MSA #45780



Assessment Area: 2016 Toledo, OH MSA #45780



APPENDIX B – DEMOGRAPHIC INFORMATION

2021 TOLEDO, OHIO MSA #45780 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	36	21.2	16,210	10.8	7,164	44.2	34,888	23.2
Moderate	27	15.9	20,300	13.5	4,814	23.7	25,042	16.6
Middle	65	38.2	64,245	42.7	6,817	10.6	29,564	19.6
Upper	40	23.5	49,863	33.1	2,074	4.2	61,127	40.6
Unknown	2	1.2	3	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>170</b>	<b>100.0</b>	<b>150,621</b>	<b>100.0</b>	<b>20,869</b>	<b>13.9</b>	<b>150,621</b>	<b>100.0</b>
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied		Rental		Vacant			
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	40,897	10,549	6.7	25.8	20,968	51.3	9,380	22.9
Moderate	43,263	18,536	11.8	42.8	18,044	41.7	6,683	15.4
Middle	120,881	71,080	45.4	58.8	34,591	28.6	15,210	12.6
Upper	80,503	56,503	36.1	70.2	16,220	20.1	7,780	9.7
Unknown	106	0	0.0	0.0	73	68.9	33	31.1
<b>Total AA</b>	<b>285,650</b>	<b>156,668</b>	<b>100.0</b>	<b>54.8</b>	<b>89,896</b>	<b>31.5</b>	<b>39,086</b>	<b>13.7</b>
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low	2,955	12.5	2,533	12.0	403	17.4	19	8.2
Moderate	2,495	10.5	2,240	10.6	241	10.4	14	6.0
Middle	9,198	38.9	8,275	39.2	820	35.4	103	44.2
Upper	9,007	38.0	8,062	38.2	849	36.7	96	41.2
Unknown	19	0.1	16	0.1	2	0.1	1	0.4
<b>Total AA</b>	<b>23,674</b>	<b>100.0</b>	<b>21,126</b>	<b>100.0</b>	<b>2,315</b>	<b>100.0</b>	<b>233</b>	<b>100.0</b>
Percentage of Total Businesses:			89.2		9.8		1.0	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low	9	2.1	8	2.0	1	9.1	0	0.0
Moderate	8	1.9	6	1.5	2	18.2	0	0.0
Middle	208	49.2	204	50.0	4	36.4	0	0.0
Upper	198	46.8	190	46.6	4	36.4	4	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>423</b>	<b>100.0</b>	<b>408</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>
Percentage of Total Farms:			96.5		2.6		0.9	
Source: 2021 FFIEC Census Data 2021 Dux & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2020 TOLEDO, OHIO MSA #45780 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	36	21.2	16,210	10.8	7,164	44.2	34,838	23.2
Moderate	27	15.9	20,300	13.5	4,814	23.7	25,042	16.6
Middle	65	38.2	64,245	42.7	6,817	10.6	29,564	19.6
Upper	40	23.5	49,863	33.1	2,074	4.2	61,127	40.6
Unknown	2	1.2	3	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>170</b>	<b>100.0</b>	<b>150,621</b>	<b>100.0</b>	<b>20,869</b>	<b>13.9</b>	<b>150,621</b>	<b>100.0</b>
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	40,897	10,549	6.7	25.8	20,968	51.3	9,380	22.9
Moderate	43,263	18,536	11.8	42.8	18,044	41.7	6,683	15.4
Middle	120,881	71,080	45.4	58.8	34,591	28.6	15,210	12.6
Upper	80,503	56,503	36.1	70.2	16,220	20.1	7,780	9.7
Unknown	106	0	0.0	0.0	73	68.9	33	31.1
<b>Total AA</b>	<b>285,650</b>	<b>156,668</b>	<b>100.0</b>	<b>54.8</b>	<b>89,896</b>	<b>31.5</b>	<b>39,086</b>	<b>13.7</b>
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	#	%	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
Low	2,916	12.3	2,487	11.8	412	17.2	17	7.7
Moderate	2,388	10.1	2,119	10.1	255	10.7	14	6.3
Middle	9,225	39.0	8,278	39.4	845	35.4	102	45.9
Upper	9,094	38.5	8,132	38.7	874	36.6	88	39.6
Unknown	20	0.1	16	0.1	3	0.1	1	0.5
<b>Total AA</b>	<b>23,643</b>	<b>100.0</b>	<b>21,032</b>	<b>100.0</b>	<b>2,389</b>	<b>100.0</b>	<b>222</b>	<b>100.0</b>
Percentage of Total Businesses:					89.0		10.1	
Total Farms by Tract	Farms by Tract & Revenue Size							
	#	%	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
Low	9	2.0	8	1.9	1	9.1	0	0.0
Moderate	8	1.8	6	1.4	2	18.2	0	0.0
Middle	222	50.0	217	50.7	4	36.4	1	20.0
Upper	205	46.2	197	46.0	4	36.4	4	80.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>444</b>	<b>100.0</b>	<b>428</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>
Percentage of Total Farms:			96.4		2.5		1.1	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

2019 TOLEDO, OHIO MSA #45780 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	36	21.2	16,210	10.8	7,164	44.2	34,888	23.2
Moderate	27	15.9	20,300	13.5	4,814	23.7	25,042	16.6
Middle	65	38.2	64,245	42.7	6,817	10.6	29,564	19.6
Upper	40	23.5	49,863	33.1	2,074	4.2	61,127	40.6
Unknown	2	1.2	3	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>170</b>	<b>100.0</b>	<b>150,621</b>	<b>100.0</b>	<b>20,869</b>	<b>13.9</b>	<b>150,621</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	40,897	10,549	6.7	25.8	20,968	51.3	9,380	22.9
Moderate	43,263	18,536	11.8	42.8	18,044	41.7	6,683	15.4
Middle	120,881	71,080	45.4	58.8	34,591	28.6	15,210	12.6
Upper	80,503	56,503	36.1	70.2	16,220	20.1	7,780	9.7
Unknown	106	0	0.0	0.0	73	68.9	33	31.1
<b>Total AA</b>	<b>285,650</b>	<b>156,668</b>	<b>100.0</b>	<b>54.8</b>	<b>89,896</b>	<b>31.5</b>	<b>39,086</b>	<b>13.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,904	12.2	2,470	11.7	419	17.2	15	6.4
Moderate	2,401	10.1	2,127	10.1	260	10.7	14	6.0
Middle	9,228	38.9	8,261	39.2	867	35.5	100	42.7
Upper	9,195	38.7	8,202	38.9	889	36.4	104	44.4
Unknown	24	0.1	19	0.1	4	0.2	1	0.4
<b>Total AA</b>	<b>23,752</b>	<b>100.0</b>	<b>21,079</b>	<b>100.0</b>	<b>2,439</b>	<b>100.0</b>	<b>234</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>88.7</b>		<b>10.3</b>		<b>1.0</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	10	2.1	9	1.9	1	8.3	0	0.0
Moderate	7	1.5	5	1.1	2	16.7	0	0.0
Middle	242	50.3	237	51.1	4	33.3	1	20.0
Upper	222	46.2	213	45.9	5	41.7	4	80.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>481</b>	<b>100.0</b>	<b>464</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>96.5</b>		<b>2.5</b>		<b>1.0</b>	
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2018 TOLEDO, OHIO MSA #45780 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	36	21.2	16,210	10.8	7,164	44.2	34,541	22.9
Moderate	27	15.9	20,300	13.5	4,814	23.7	24,744	16.4
Middle	62	36.5	60,965	40.5	6,663	10.9	29,360	19.5
Upper	43	25.3	53,143	35.3	2,228	4.2	61,976	41.1
Unknown	2	1.2	3	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>170</b>	<b>100.0</b>	<b>150,621</b>	<b>100.0</b>	<b>20,869</b>	<b>13.9</b>	<b>150,621</b>	<b>100.0</b>
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	40,897	10,549	6.7	25.8	20,968	51.3	9,380	22.9
Moderate	43,263	18,536	11.8	42.8	18,044	41.7	6,683	15.4
Middle	114,212	67,261	42.9	58.9	33,782	29.6	13,169	11.5
Upper	87,172	60,322	38.5	69.2	17,029	19.5	9,821	11.3
Unknown	106	0	0.0	0.0	73	68.9	33	31.1
<b>Total AA</b>	<b>285,650</b>	<b>156,668</b>	<b>100.0</b>	<b>54.8</b>	<b>89,896</b>	<b>31.5</b>	<b>39,086</b>	<b>13.7</b>
Total Businesses by Tract	Businesses by Tract & Revenue Size							
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,898	12.2	2,438	11.6	425	17.2	35	12.2
Moderate	2,408	10.1	2,122	10.1	270	10.9	16	5.6
Middle	8,772	37.0	7,835	37.3	831	33.6	106	37.1
Upper	9,635	40.6	8,566	40.8	941	38.1	128	44.8
Unknown	26	0.1	21	0.1	4	0.2	1	0.3
<b>Total AA</b>	<b>23,739</b>	<b>100.0</b>	<b>20,982</b>	<b>100.0</b>	<b>2,471</b>	<b>100.0</b>	<b>286</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>88.4</b>		<b>10.4</b>		<b>1.2</b>	
Total Farms by Tract	Farms by Tract & Revenue Size							
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7	1.4	6	1.3	1	10.0	0	0.0
Moderate	7	1.4	5	1.1	2	20.0	0	0.0
Middle	228	46.6	225	47.5	3	30.0	0	0.0
Upper	247	50.5	238	50.2	4	40.0	5	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>489</b>	<b>100.0</b>	<b>474</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>96.9</b>		<b>2.0</b>		<b>1.0</b>	
<p>Source: 2018 FFIEC Census Data 2018 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								



2017 TOLEDO, OHIO MSA #45780 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	36	21.2	16,210	10.8	7,164	44.2	34,541	22.9
Moderate	27	15.9	20,300	13.5	4,814	23.7	24,744	16.4
Middle	62	36.5	60,965	40.5	6,663	10.9	29,360	19.5
Upper	43	25.3	53,143	35.3	2,228	4.2	61,976	41.1
Unknown	2	1.2	3	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>170</b>	<b>100.0</b>	<b>150,621</b>	<b>100.0</b>	<b>20,869</b>	<b>13.9</b>	<b>150,621</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	40,897	10,549	6.7	25.8	20,968	51.3	9,380	22.9
Moderate	43,263	18,536	11.8	42.8	18,044	41.7	6,683	15.4
Middle	114,212	67,261	42.9	58.9	33,782	29.6	13,169	11.5
Upper	87,172	60,322	38.5	69.2	17,029	19.5	9,821	11.3
Unknown	106	0	0.0	0.0	73	68.9	33	31.1
<b>Total AA</b>	<b>285,650</b>	<b>156,668</b>	<b>100.0</b>	<b>54.8</b>	<b>89,896</b>	<b>31.5</b>	<b>39,086</b>	<b>13.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,444	12.1	1,990	11.4	436	17.8	18	8.1
Moderate	2,032	10.1	1,735	9.9	286	11.7	11	5.0
Middle	7,530	37.3	6,631	37.9	813	33.2	86	38.7
Upper	8,148	40.4	7,128	40.7	914	37.3	106	47.7
Unknown	19	0.1	16	0.1	2	0.1	1	0.5
<b>Total AA</b>	<b>20,173</b>	<b>100.0</b>	<b>17,500</b>	<b>100.0</b>	<b>2,451</b>	<b>100.0</b>	<b>222</b>	<b>100.0</b>
Percentage of Total Businesses:			86.7		12.1		1.1	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6	1.3	4	0.9	2	15.4	0	0.0
Moderate	6	1.3	3	0.7	3	23.1	0	0.0
Middle	236	50.3	232	50.9	4	30.8	0	0.0
Upper	221	47.1	217	47.6	4	30.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>469</b>	<b>100.0</b>	<b>456</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:			97.2		2.8		0.0	
Source: 2017 FFIEC Census Data 2017 Dux & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2016 TOLEDO, OHIO MSA #45780 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	27	15.9	13,612	8.8	5,839	42.9	33,392	21.5
Moderate	30	17.6	22,795	14.7	4,869	21.4	25,748	16.6
Middle	67	39.4	65,229	42.0	5,528	8.5	31,417	20.2
Upper	44	25.9	53,701	34.6	2,080	3.9	64,789	41.7
Unknown	2	1.2	9	0.0	9	100.0	0	0.0
<b>Total AA</b>	<b>170</b>	<b>100.0</b>	<b>155,346</b>	<b>100.0</b>	<b>18,325</b>	<b>11.8</b>	<b>155,346</b>	<b>100.0</b>
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	29,729	9,428	5.7	31.7	14,002	47.1	6,299	21.2
Moderate	50,186	20,988	12.6	41.8	21,748	43.3	7,450	14.8
Middle	119,926	74,048	44.6	61.7	31,710	26.4	14,168	11.8
Upper	84,958	61,628	37.1	72.5	13,478	15.9	9,852	11.6
Unknown	129	0	0.0	0.0	110	85.3	19	14.7
<b>Total AA</b>	<b>284,928</b>	<b>166,092</b>	<b>100.0</b>	<b>58.3</b>	<b>81,048</b>	<b>28.4</b>	<b>37,788</b>	<b>13.3</b>
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Total Businesses by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,626	6.9	1,412	6.7	204	8.8	10	4.3
Moderate	3,341	14.1	2,972	14.1	353	15.2	16	6.9
Middle	9,785	41.3	8,710	41.2	975	42.1	100	42.9
Upper	8,903	37.6	8,016	37.9	781	33.7	106	45.5
Unknown	19	0.1	16	0.1	2	0.1	1	0.4
<b>Total AA</b>	<b>23,674</b>	<b>100.0</b>	<b>21,126</b>	<b>100.0</b>	<b>2,315</b>	<b>100.0</b>	<b>233</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>89.2</b>		<b>9.8</b>		<b>1.0</b>	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Total Farms by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	0.7	2	0.5	1	9.1	0	0.0
Moderate	13	3.1	11	2.7	2	18.2	0	0.0
Middle	195	46.1	190	46.6	4	36.4	1	25.0
Upper	212	50.1	205	50.2	4	36.4	3	75.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>423</b>	<b>100.0</b>	<b>408</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>96.5</b>		<b>2.6</b>		<b>0.9</b>	
<p>Source: 2016 FFIEC Census Data 2016 Dun &amp; Bradstreet Data 2006-2010 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								



APPENDIX C – LENDING TABLES

Distribution of 2021 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Toledo, OH MSA #45780							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	12	3.8	8.4	1,352	1.8	4.2	23.2
Moderate	46	14.4	22.5	6,161	8.2	15.3	16.6
Middle	73	22.8	22.6	12,515	16.6	20.3	19.6
Upper	166	51.9	36.3	44,228	58.7	50.5	40.6
Unknown	23	7.2	10.2	11,050	14.7	9.7	0.0
<b>Total</b>	<b>320</b>	<b>100.0</b>	<b>100.0</b>	<b>75,306</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	11	3.1	5.7	882	1.3	2.8	23.2
Moderate	45	12.5	16.8	5,827	8.9	11.2	16.6
Middle	76	21.2	22.6	11,854	18.0	18.4	19.6
Upper	216	60.2	42.7	44,228	67.3	54.0	40.6
Unknown	11	3.1	12.2	2,925	4.5	13.6	0.0
<b>Total</b>	<b>359</b>	<b>100.0</b>	<b>100.0</b>	<b>65,716</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	5.0	7.7	20	1.3	5.0	23.2
Moderate	2	10.0	16.5	220	14.0	13.6	16.6
Middle	3	15.0	22.3	172	10.9	19.2	19.6
Upper	10	50.0	50.6	536	34.0	58.4	40.6
Unknown	4	20.0	2.9	627	39.8	3.8	0.0
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>1,575</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							
Low	25	3.5	6.9	2,290	1.5	3.3	23.2
Moderate	95	13.2	18.8	12,319	8.3	12.2	16.6
Middle	155	21.5	22.3	24,645	16.6	18.0	19.6
Upper	395	54.9	40.1	89,228	60.1	49.1	40.6
Unknown	50	6.9	11.9	20,037	13.5	17.5	0.0
<b>Total</b>	<b>720</b>	<b>100.0</b>	<b>100.0</b>	<b>148,519</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2021 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Toledo, OH #45780							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
<b>Other Purpose LOC</b>							
Low	0	0.0	8.6	0	0.0	5.2	23.2
Moderate	0	0.0	20.0	0	0.0	14.3	16.6
Middle	0	0.0	24.8	0	0.0	20.9	19.6
Upper	0	0.0	44.8	0	0.0	58.2	40.6
Unknown	0	0.0	1.7	0	0.0	1.4	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	1	11.1	12.4	36	7.4	4.9	23.2
Moderate	2	22.2	18.8	111	22.8	12.6	16.6
Middle	3	33.3	19.2	104	21.4	13.3	19.6
Upper	3	33.3	45.7	236	48.5	64.1	40.6
Unknown	0	0.0	3.8	0	0.0	5.1	0.0
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>487</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	0.0	0	0.0	0.0	23.2
Moderate	0	0.0	0.4	0	0.0	0.2	16.6
Middle	0	0.0	0.0	0	0.0	0.0	19.6
Upper	0	0.0	0.4	0	0.0	0.0	40.6
Unknown	0	0.0	99.2	0	0.0	99.8	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Toledo, OH MSA #45780							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	9	2.8	9.4	840	1.2	5.0	23.2
Moderate	30	9.5	23.3	3,806	5.4	16.2	16.6
Middle	61	19.2	23.5	10,355	14.7	21.7	19.6
Upper	198	62.5	36.7	52,667	74.6	50.9	40.6
Unknown	19	6.0	7.0	2,902	4.1	6.3	0.0
<b>Total</b>	<b>317</b>	<b>100.0</b>	<b>100.0</b>	<b>70,570</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	7	1.2	4.7	681	0.6	2.2	23.2
Moderate	50	8.4	12.7	5,445	4.6	8.0	16.6
Middle	107	18.1	21.2	15,649	13.2	16.9	19.6
Upper	417	70.4	50.0	94,518	79.5	60.1	40.6
Unknown	11	1.9	11.5	2,606	2.2	12.8	0.0
<b>Total</b>	<b>592</b>	<b>100.0</b>	<b>100.0</b>	<b>118,899</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	4.8	6.7	29	3.8	5.5	23.2
Moderate	3	14.3	17.9	27	3.5	13.6	16.6
Middle	2	9.5	22.2	92	11.9	20.7	19.6
Upper	14	66.7	51.6	605	78.4	58.7	40.6
Unknown	1	4.8	1.6	19	2.5	1.7	0.0
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>772</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							
Low	19	2.0	6.6	1,627	0.8	3.2	23.2
Moderate	86	9.0	16.7	9,333	4.8	10.7	16.6
Middle	173	18.0	21.5	26,225	13.5	17.5	19.6
Upper	641	66.8	43.7	148,722	76.8	52.7	40.6
Unknown	40	4.2	11.5	7,740	4.0	15.9	0.0
<b>Total</b>	<b>959</b>	<b>100.0</b>	<b>100.0</b>	<b>193,647</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Toledo, OH #45780							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Other Purpose LOC</b>							
Low	0	0.0	9.3	0	0.0	6.8	23.2
Moderate	0	0.0	17.9	0	0.0	14.2	16.6
Middle	0	0.0	21.8	0	0.0	18.7	19.6
Upper	0	0.0	50.2	0	0.0	59.8	40.6
Unknown	0	0.0	0.7	0	0.0	0.5	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	1	5.9	9.6	28	4.1	7.2	23.2
Moderate	2	11.8	22.5	33	4.8	16.2	16.6
Middle	3	17.6	14.7	129	18.9	10.5	19.6
Upper	10	58.8	42.7	447	65.5	56.8	40.6
Unknown	1	5.9	10.6	45	6.6	9.3	0.0
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>682</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	0.0	0	0.0	0.0	23.2
Moderate	0	0.0	0.2	0	0.0	0.1	16.6
Middle	0	0.0	0.0	0	0.0	0.0	19.6
Upper	0	0.0	0.0	0	0.0	0.0	40.6
Unknown	0	0.0	99.8	0	0.0	99.9	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Toledo, OH MSA #45780							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	14	4.6	8.0	1,037	1.7	3.9	23.2
Moderate	44	14.3	21.9	4,819	7.9	14.8	16.6
Middle	53	17.3	23.4	8,353	13.7	21.0	19.6
Upper	188	61.2	37.5	45,899	75.5	52.2	40.6
Unknown	8	2.6	9.2	721	1.2	8.1	0.0
<b>Total</b>	<b>307</b>	<b>100.0</b>	<b>100.0</b>	<b>60,829</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	5	2.9	6.7	172	0.5	3.1	23.2
Moderate	19	11.1	14.7	2,408	7.1	9.5	16.6
Middle	29	17.0	19.9	4,175	12.2	15.8	19.6
Upper	116	67.8	47.0	26,841	78.6	57.7	40.6
Unknown	2	1.2	11.8	556	1.6	14.0	0.0
<b>Total</b>	<b>171</b>	<b>100.0</b>	<b>100.0</b>	<b>34,152</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	8.7	0	0.0	5.9	23.2
Moderate	3	11.1	18.6	130	11.1	16.2	16.6
Middle	3	11.1	24.0	89	7.6	19.8	19.6
Upper	21	77.8	47.0	954	81.3	56.7	40.6
Unknown	0	0.0	1.7	0	0.0	1.5	0.0
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>1,173</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							
Low	20	3.8	7.6	1,232	1.3	3.3	23.2
Moderate	69	13.0	18.6	7,486	7.6	11.2	16.6
Middle	89	16.8	21.8	12,830	13.0	16.5	19.6
Upper	336	63.5	40.7	74,433	75.5	47.0	40.6
Unknown	15	2.8	11.3	2,555	2.6	22.0	0.0
<b>Total</b>	<b>529</b>	<b>100.0</b>	<b>100.0</b>	<b>98,536</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Toledo, OH #45780							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Other Purpose LOC</b>							
Low	0	0.0	10.7	0	0.0	6.6	23.2
Moderate	0	0.0	19.0	0	0.0	17.0	16.6
Middle	0	0.0	24.2	0	0.0	20.8	19.6
Upper	0	0.0	43.3	0	0.0	53.6	40.6
Unknown	0	0.0	2.9	0	0.0	2.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	1	5.9	11.4	23	3.5	7.3	23.2
Moderate	3	17.6	19.1	129	19.4	13.1	16.6
Middle	3	17.6	23.2	77	11.6	21.1	19.6
Upper	10	58.8	43.4	436	65.6	54.5	40.6
Unknown	0	0.0	2.9	0	0.0	4.0	0.0
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>665</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	0.7	0	0.0	0.3	23.2
Moderate	0	0.0	0.7	0	0.0	0.5	16.6
Middle	0	0.0	0.0	0	0.0	0.0	19.6
Upper	0	0.0	0.7	0	0.0	0.2	0.0
Unknown	0	0.0	97.8	0	0.0	99.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Toledo, OH MSA #45780							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%		\$%
<b>Home Purchase Loans</b>							
Low	15	5.2	9.1	1,079	2.2	4.4	22.9
Moderate	48	16.6	21.5	5,200	10.4	14.7	16.4
Middle	64	22.1	23.0	8,964	18.0	20.8	19.5
Upper	150	51.9	35.7	33,673	67.6	50.6	41.1
Unknown	12	4.2	10.7	898	1.8	9.5	0.0
<b>Total</b>	<b>289</b>	<b>100.0</b>	<b>100.0</b>	<b>49,814</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	4	4.5	10.3	108	0.9	5.7	22.9
Moderate	16	18.2	17.7	1,304	10.9	13.0	16.4
Middle	14	15.9	24.1	1,339	11.2	21.8	19.5
Upper	50	56.8	40.9	8,395	70.5	51.0	41.1
Unknown	4	4.5	7.1	766	6.4	8.6	0.0
<b>Total</b>	<b>88</b>	<b>100.0</b>	<b>100.0</b>	<b>11,912</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	7.7	8.1	30	5.5	6.6	22.9
Moderate	3	23.1	18.9	100	18.5	15.7	16.4
Middle	4	30.8	24.6	194	35.9	21.3	19.5
Upper	5	38.5	44.9	217	40.1	49.0	41.1
Unknown	0	0.0	3.5	0	0.0	7.3	0.0
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>541</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							
Low	20	4.8	9.0	1,217	1.9	4.4	22.9
Moderate	69	16.6	19.7	6,650	10.5	12.9	16.4
Middle	88	21.2	22.7	10,839	17.0	18.7	19.5
Upper	220	53.0	37.4	42,980	67.6	45.4	41.1
Unknown	18	4.3	11.2	1,892	3.0	18.6	0.0
<b>Total</b>	<b>415</b>	<b>100.0</b>	<b>100.0</b>	<b>63,578</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Toledo, OH #45780							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
<b>Other Purpose LOC</b>							
Low	0	0.0	8.4	0	0.0	6.0	22.9
Moderate	0	0.0	20.7	0	0.0	16.0	16.4
Middle	0	0.0	22.2	0	0.0	19.4	19.5
Upper	0	0.0	48.0	0	0.0	57.9	41.1
Unknown	0	0.0	0.7	0	0.0	0.7	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	8.2	0	0.0	6.6	22.9
Moderate	2	10.0	25.1	46	5.6	19.1	16.4
Middle	3	15.0	23.8	87	10.5	22.0	19.5
Upper	15	75.0	40.7	695	83.9	50.1	41.1
Unknown	0	0.0	2.2	0	0.0	2.3	0.0
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>828</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	0.0	0	0.0	0.0	22.9
Moderate	0	0.0	1.0	0	0.0	1.2	16.4
Middle	0	0.0	2.1	0	0.0	1.2	19.5
Upper	0	0.0	1.0	0	0.0	1.1	41.1
Unknown	0	0.0	95.9	0	0.0	96.5	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



Distribution of 2017 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Toledo, OH MSA #45780							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>							
Low	3	1.3	6.5	287	0.7	3.1	22.9
Moderate	30	12.5	20.4	3,245	8.0	13.4	16.4
Middle	49	20.4	22.1	5,421	13.3	19.4	19.5
Upper	148	61.7	38.5	30,534	74.8	53.3	41.1
Unknown	10	4.2	12.4	1,326	3.2	10.8	0.0
<b>Total</b>	<b>240</b>	<b>100.0</b>	<b>100.0</b>	<b>40,813</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	2	2.0	6.4	131	0.9	3.2	22.9
Moderate	8	8.1	14.7	611	4.4	9.8	16.4
Middle	23	23.2	21.8	2,685	19.5	18.0	19.5
Upper	63	63.6	42.2	9,980	72.3	53.0	41.1
Unknown	3	3.0	14.9	394	2.9	16.0	0.0
<b>Total</b>	<b>99</b>	<b>100.0</b>	<b>100.0</b>	<b>13,801</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	3	4.9	9.4	17	0.7	3.6	22.9
Moderate	11	18.0	22.8	310	13.5	13.1	16.4
Middle	12	19.7	23.7	134	5.8	21.5	19.5
Upper	27	44.3	39.7	1,621	70.7	57.3	41.1
Unknown	8	13.1	4.4	211	9.2	4.4	0.0
<b>Total</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>2,293</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							
Low	8	2.0	6.7	435	0.7	2.8	22.9
Moderate	49	12.0	18.9	4,166	7.1	11.1	16.4
Middle	84	20.6	22.0	8,240	14.0	17.1	19.5
Upper	238	58.3	39.3	42,135	71.4	47.9	41.1
Unknown	29	7.1	13.1	4,024	6.8	20.9	0.0
<b>Total</b>	<b>408</b>	<b>100.0</b>	<b>100.0</b>	<b>59,000</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2017 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2016 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Toledo, OH MSA #45780							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%		\$%
<b>Home Purchase Loans</b>							
Low	2	1.6	7.2	138	0.7	3.5	21.5
Moderate	23	18.9	19.8	2,059	10.3	13.0	16.6
Middle	31	25.4	24.1	4,056	20.3	21.0	20.2
Upper	62	50.8	36.9	12,922	64.7	51.4	41.7
Unknown	4	3.3	12.0	786	3.9	11.0	0.0
<b>Total</b>	<b>122</b>	<b>100.0</b>	<b>100.0</b>	<b>19,961</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	3	3.5	5.5	201	1.6	2.8	21.5
Moderate	11	12.9	12.0	981	7.6	7.6	16.6
Middle	13	15.3	19.7	1,347	10.5	15.3	20.2
Upper	57	67.1	46.4	10,062	78.5	57.6	41.7
Unknown	1	1.2	16.4	233	1.8	16.7	0.0
<b>Total</b>	<b>85</b>	<b>100.0</b>	<b>100.0</b>	<b>12,824</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	10.6	0	0.0	4.4	21.5
Moderate	6	23.1	20.2	91	7.6	9.6	16.6
Middle	8	30.8	26.0	169	14.2	19.2	20.2
Upper	8	30.8	38.7	876	73.6	59.7	41.7
Unknown	4	15.4	4.5	54	4.5	7.2	0.0
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>1,190</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							
Low	5	2.1	6.8	339	1.0	3.1	21.5
Moderate	40	17.2	17.0	3,131	9.2	10.3	16.6
Middle	52	22.3	22.5	5,572	16.4	17.8	20.2
Upper	127	54.5	40.1	23,860	70.2	50.5	41.7
Unknown	9	3.9	13.7	1,073	3.2	18.4	0.0
<b>Total</b>	<b>233</b>	<b>100.0</b>	<b>100.0</b>	<b>33,975</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2016 FFIEC Census Data							
2006-2010 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2021 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	3	0.9	2.7	161	0.2	1.4	6.7
Moderate	6	1.9	9.5	784	1.0	5.2	11.8
Middle	148	46.3	47.0	25,678	34.1	38.4	45.4
Upper	163	50.9	40.7	48,683	64.6	55.0	36.1
<b>Total</b>	<b>320</b>	<b>100.0</b>	<b>100.0</b>	<b>75,306</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.2	0	0.0	0.6	6.7
Moderate	7	1.9	5.7	719	1.1	3.3	11.8
Middle	184	51.3	41.7	28,738	43.7	34.0	45.4
Upper	168	46.8	51.4	36,259	55.2	62.1	36.1
<b>Total</b>	<b>359</b>	<b>100.0</b>	<b>100.0</b>	<b>65,716</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	5.0	2.1	20	1.3	1.0	6.7
Moderate	0	0.0	6.7	0	0.0	4.7	11.8
Middle	11	55.0	40.3	673	42.7	34.2	45.4
Upper	8	40.0	50.9	882	56.0	60.2	36.1
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>1,575</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
Low	0	0.0	13.2	0	0.0	27.5	23.3
Moderate	4	33.3	31.4	2,092	38.5	15.9	15.4
Middle	7	58.3	36.4	3,195	58.8	30.4	40.9
Upper	1	8.3	19.0	148	2.7	26.2	20.1
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>5,435</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							<b>Owner Occupied Units %</b>
Low	4	0.6	1.9	181	0.1	2.6	6.7
Moderate	17	2.4	7.5	3,595	2.4	4.9	11.8
Middle	356	49.4	43.8	58,664	39.5	35.6	45.4
Upper	343	47.6	46.8	86,079	58.0	57.0	36.1
<b>Total</b>	<b>720</b>	<b>100.0</b>	<b>100.0</b>	<b>148,519</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Other Purpose LOC</b>							
Low	0	0.0	1.9	0	0.0	0.7	6.7
Moderate	0	0.0	8.6	0	0.0	4.9	11.8
Middle	0	0.0	38.6	0	0.0	30.9	45.4
Upper	0	0.0	50.7	0	0.0	63.3	36.1
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	3.8	0	0.0	2.1	6.7
Moderate	0	0.0	9.4	0	0.0	3.9	11.8
Middle	6	66.7	39.7	380	78.0	34.4	45.4
Upper	3	33.3	47.0	107	22.0	59.6	36.1
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>487</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	3.3	0	0.0	1.1	6.7
Moderate	0	0.0	12.8	0	0.0	5.6	11.8
Middle	0	0.0	62.8	0	0.0	35.7	45.4
Upper	0	0.0	21.1	0	0.0	57.6	36.1
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	2	0.6	2.0	96	0.1	1.1	6.7
Moderate	7	2.2	8.3	1,641	2.3	4.7	11.8
Middle	141	44.5	46.3	26,024	36.9	36.9	45.4
Upper	167	52.7	43.4	42,809	60.7	57.4	36.1
<b>Total</b>	<b>317</b>	<b>100.0</b>	<b>100.0</b>	<b>70,570</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	2	0.3	0.8	653	0.5	0.4	6.7
Moderate	9	1.5	4.0	681	0.6	2.3	11.8
Middle	255	43.1	36.6	44,004	37.0	29.1	45.4
Upper	326	55.1	58.6	73,561	61.9	68.2	36.1
<b>Total</b>	<b>592</b>	<b>100.0</b>	<b>100.0</b>	<b>118,899</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.8	0	0.0	1.0	6.7
Moderate	0	0.0	5.9	0	0.0	3.5	11.8
Middle	12	57.1	41.0	380	49.2	38.6	45.4
Upper	9	42.9	51.4	392	50.8	56.9	36.1
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>772</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
Low	2	16.7	16.2	116	4.3	14.8	
Moderate	3	25.0	27.0	283	10.4	11.0	23.3
Middle	6	50.0	39.6	2,157	79.2	35.8	15.4
Upper	1	8.3	17.1	168	6.2	38.4	40.9
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>2,724</b>	<b>100.0</b>	<b>100.0</b>	<b>20.1</b>
<b>Total HMDA Reportable Loans</b>							<b>Owner Occupied Units %</b>
Low	6	0.6	1.5	865	0.4	1.5	
Moderate	19	2.0	6.0	2,605	1.3	3.8	6.7
Middle	426	44.4	41.0	73,089	37.7	32.9	11.8
Upper	508	53.0	51.5	117,088	60.5	61.9	45.4
<b>Total</b>	<b>959</b>	<b>100.0</b>	<b>100.0</b>	<b>193,647</b>	<b>100.0</b>	<b>100.0</b>	<b>36.1</b>
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
<b>Other Purpose LOC</b>							
Low	0	0.0	1.9	0	0.0	1.1	6.7
Moderate	0	0.0	4.6	0	0.0	2.7	11.8
Middle	0	0.0	38.1	0	0.0	32.6	45.4
Upper	0	0.0	55.4	0	0.0	63.6	36.1
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	1.4	0	0.0	0.8	6.7
Moderate	0	0.0	7.8	0	0.0	3.8	11.8
Middle	12	70.6	53.2	524	76.8	40.0	45.4
Upper	5	29.4	37.6	158	23.2	55.4	36.1
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>682</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	3.8	0	0.0	2.1	6.7
Moderate	0	0.0	12.7	0	0.0	9.0	11.8
Middle	0	0.0	56.3	0	0.0	51.1	45.4
Upper	0	0.0	27.2	0	0.0	37.9	36.1
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>							
Low	1	0.3	1.9	22	0.0	1.1	6.7
Moderate	13	4.2	8.2	794	1.3	4.6	11.8
Middle	149	48.5	46.0	22,877	37.6	36.2	45.4
Upper	144	46.9	43.9	37,136	61.0	58.1	36.1
<b>Total</b>	<b>307</b>	<b>100.0</b>	<b>100.0</b>	<b>60,829</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	2	1.2	1.1	274	0.8	0.6	6.7
Moderate	3	1.8	5.5	367	1.1	3.1	11.8
Middle	77	45.0	39.3	13,235	38.8	31.1	45.4
Upper	89	52.0	54.0	20,276	59.4	65.3	36.1
<b>Total</b>	<b>171</b>	<b>100.0</b>	<b>100.0</b>	<b>34,152</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	3.7	1.9	27	2.3	1.1	6.7
Moderate	0	0.0	7.3	0	0.0	4.8	11.8
Middle	11	40.7	41.8	506	43.1	34.7	45.4
Upper	15	55.6	49.0	640	54.6	59.5	36.1
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>1,173</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
Low	3	42.9	23.1	256	14.9	17.4	
Moderate	0	0.0	25.2	0	0.0	13.2	15.4
Middle	3	42.9	32.9	762	44.4	29.5	40.9
Upper	1	14.3	18.9	699	40.7	39.9	20.1
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>1,717</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							<b>Owner Occupied Units %</b>
Low	7	1.3	1.9	579	0.6	3.0	
Moderate	17	3.2	7.4	1,216	1.2	5.3	11.8
Middle	253	47.8	43.5	37,883	38.4	33.9	45.4
Upper	252	47.6	47.2	58,858	59.7	57.8	36.1
<b>Total</b>	<b>529</b>	<b>100.0</b>	<b>100.0</b>	<b>98,536</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Other Purpose LOC</b>							
Low	0	0.0	1.4	0	0.0	0.7	6.7
Moderate	0	0.0	5.6	0	0.0	3.3	11.8
Middle	0	0.0	43.2	0	0.0	38.1	45.4
Upper	0	0.0	49.8	0	0.0	58.0	36.1
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	3.3	0	0.0	1.4	6.7
Moderate	1	5.9	9.2	55	8.3	6.5	11.8
Middle	13	76.5	48.2	503	75.6	35.4	45.4
Upper	3	17.6	39.3	107	16.1	56.7	36.1
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>665</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	4.7	0	0.0	2.4	6.7
Moderate	0	0.0	16.1	0	0.0	11.5	11.8
Middle	0	0.0	56.2	0	0.0	52.5	45.4
Upper	0	0.0	23.0	0	0.0	33.5	36.1
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	2	0.7	2.0	286	0.6	1.1	6.7
Moderate	11	3.8	8.7	1,089	2.2	4.7	11.8
Middle	122	42.2	43.1	17,121	34.4	33.0	42.9
Upper	154	53.3	46.2	31,318	62.9	61.2	38.5
<b>Total</b>	<b>289</b>	<b>100.0</b>	<b>100.0</b>	<b>49,814</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	2	2.3	1.9	165	1.4	1.0	6.7
Moderate	2	2.3	7.2	148	1.2	4.6	11.8
Middle	28	31.8	40.6	3,075	25.8	32.6	42.9
Upper	56	63.6	50.3	8,524	71.6	61.9	38.5
<b>Total</b>	<b>88</b>	<b>100.0</b>	<b>100.0</b>	<b>11,912</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.6	0	0.0	1.1	6.7
Moderate	1	7.7	7.0	11	2.0	5.5	11.8
Middle	4	30.8	38.2	116	21.4	33.3	42.9
Upper	8	61.5	53.3	414	76.5	60.2	38.5
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>541</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
Low	0	0.0	17.1	0	0.0	33.9	23.3
Moderate	2	40.0	24.3	159	32.9	11.9	15.4
Middle	2	40.0	41.4	249	51.6	33.6	40.3
Upper	1	20.0	17.1	75	15.5	20.7	20.7
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>483</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							<b>Owner Occupied Units %</b>
Low	4	1.0	2.2	451	0.7	4.2	6.7
Moderate	17	4.1	8.4	1,423	2.2	5.4	11.8
Middle	169	40.7	41.9	21,014	33.1	33.1	42.9
Upper	225	54.2	47.5	40,690	64.0	57.3	38.5
<b>Total</b>	<b>415</b>	<b>100.0</b>	<b>100.0</b>	<b>63,578</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Other Purpose LOC</b>							
Low	0	0.0	2.8	0	0.0	1.2	6.7
Moderate	0	0.0	6.5	0	0.0	3.6	11.8
Middle	0	0.0	36.2	0	0.0	29.4	42.9
Upper	0	0.0	54.5	0	0.0	65.9	38.5
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	2.2	0	0.0	0.8	6.7
Moderate	1	5.0	12.1	16	1.9	6.9	11.8
Middle	13	65.0	43.3	453	54.7	41.1	42.9
Upper	6	30.0	42.4	359	43.4	51.2	38.5
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>828</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	7.2	0	0.0	4.2	6.7
Moderate	0	0.0	15.2	0	0.0	9.9	11.8
Middle	0	0.0	50.6	0	0.0	46.9	42.9
Upper	0	0.0	26.9	0	0.0	39.1	38.5
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2017 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	2	0.8	2.2	161	0.4	1.2	6.7
Moderate	12	5.0	8.0	1,109	2.7	4.6	11.8
Middle	83	34.6	44.2	10,092	24.7	33.8	42.9
Upper	143	59.6	45.6	29,451	72.2	60.5	38.5
<b>Total</b>	<b>240</b>	<b>100.0</b>	<b>100.0</b>	<b>40,813</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	2.0	0	0.0	1.2	6.7
Moderate	2	2.0	7.9	172	1.2	5.0	11.8
Middle	39	39.4	41.2	4,137	30.0	32.8	42.9
Upper	58	58.6	49.0	9,492	68.8	61.1	38.5
<b>Total</b>	<b>99</b>	<b>100.0</b>	<b>100.0</b>	<b>13,801</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	2	3.3	7.6	49	2.1	2.7	6.7
Moderate	4	6.6	11.4	127	5.5	4.8	11.8
Middle	17	27.9	42.1	446	19.5	38.3	42.9
Upper	38	62.3	38.9	1,671	72.9	54.2	38.5
<b>Total</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>2,293</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
Low	2	25.0	25.8	475	22.7	21.9	23.3
Moderate	2	25.0	22.6	445	21.3	12.0	15.4
Middle	1	12.5	37.6	505	24.1	40.3	40.3
Upper	3	37.5	14.0	668	31.9	25.9	20.7
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>2,093</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							<b>Owner Occupied Units %</b>
Low	6	1.5	2.6	685	1.2	3.3	6.7
Moderate	20	4.9	8.3	1,853	3.1	5.4	11.8
Middle	140	34.3	43.2	15,180	25.7	34.3	42.9
Upper	242	59.3	45.9	41,282	70.0	57.0	38.5
<b>Total</b>	<b>408</b>	<b>100.0</b>	<b>100.0</b>	<b>59,000</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2017 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2016 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>							
Low	2	1.6	1.0	104	0.5	0.5	5.7
Moderate	0	0.0	6.7	0	0.0	3.6	12.6
Middle	42	34.4	44.9	6,268	31.4	34.6	44.6
Upper	78	63.9	47.4	13,589	68.1	61.3	37.1
<b>Total</b>	<b>122</b>	<b>100.0</b>	<b>100.0</b>	<b>19,961</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.0	0	0.0	0.5	5.7
Moderate	4	4.7	6.4	715	5.6	3.6	12.6
Middle	24	28.2	39.9	2,524	19.7	31.3	44.6
Upper	57	67.1	52.8	9,585	74.7	64.6	37.1
<b>Total</b>	<b>85</b>	<b>100.0</b>	<b>100.0</b>	<b>12,824</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	4.3	0	0.0	0.9	5.7
Moderate	0	0.0	11.0	0	0.0	5.1	12.6
Middle	7	26.9	43.9	276	23.2	34.7	44.6
Upper	19	73.1	40.8	914	76.8	59.3	37.1
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>1,190</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
Low	0	0.0	10.6	0	0.0	18.7	
Moderate	0	0.0	26.0	0	0.0	12.6	26.1
Middle	0	0.0	42.3	0	0.0	48.7	43.9
Upper	0	0.0	21.2	0	0.0	20.1	17.7
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							<b>Owner Occupied Units %</b>
Low	2	0.9	1.2	104	0.3	1.7	
Moderate	4	1.7	6.9	715	2.1	4.2	12.6
Middle	73	31.3	43.1	9,068	26.7	34.3	44.6
Upper	154	66.1	48.7	24,088	70.9	59.8	37.1
<b>Total</b>	<b>233</b>	<b>100.0</b>	<b>100.0</b>	<b>33,975</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2016 FFIEC Census Data							
2006-2010 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

## APPENDIX D – GLOSSARY

**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:** 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, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives 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 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 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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. 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 Reports 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.