

PUBLIC DISCLOSURE

February 19, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Metamora State Bank
RSSD #533227

120 Main Street
Metamora, OH 43540

Federal Reserve Bank of Cleveland

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

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

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

The major factors and criteria contributing to this rating include:

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

The previous CRA examination conducted as of January 26, 2015, resulted in a "Satisfactory" performance rating.

SCOPE OF EXAMINATION

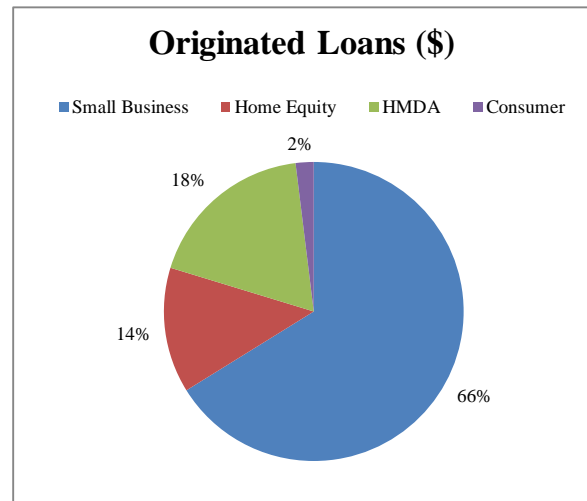
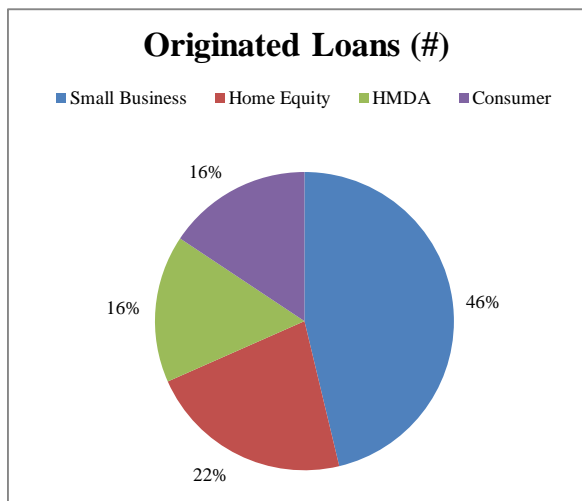
The Metamora State Bank’s (Metamora) Community Reinvestment Act (CRA) performance was evaluated using the interagency small bank examination procedures under Regulation BB.

Metamora’s CRA performance was evaluated based on lending data for the period of October 1, 2014 through December 31, 2017. The loan products evaluated included small business loans, home equity loans, consumer loans, HMDA loans, and residential real estate loans. Consumer loans were comprised of motor vehicle, other secured, and other unsecured. These loan products were selected for review because they represent the highest volume of loans made during the evaluation period. The loans were analyzed by combining the loans made in each category for the evaluation period due to the lower volume of loans originated.

Metamora’s assessment area for CRA purposes comprised one assessment area that received a full-scope review. Two community contact interviews were conducted to provide perspective on the credit needs of the assessment area in which the bank operates.

The following table and charts illustrate the volume and distribution of loans originated by Metamora during the evaluation period.

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
Small Business	136	17,775
Home Equity	65	3,644
HMDA	47	4,926
Consumer	46	522
Total	294	26,867



Based on total loan volume by number and dollar amount and the composition of the loan portfolio, small business loans received the most weight followed by home equity, HMDA/residential real estate loans, and consumer loans.

Due to the limited number of low- and moderate- income tracts in Metamora's assessment area, borrower distribution received the most weight, followed by geographic distribution.

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

DESCRIPTION OF INSTITUTION

Metamora is an interstate bank operating under a single bank shell holding company, Metamora Bancorp, Inc., in Ohio and Michigan. Metamora is a full-service community retail bank offering deposit accounts, residential mortgages, consumer, commercial, and agricultural loans. As of December 31, 2018, Metamora reported \$74.4 million in total assets, an increase of 16.2% since the previous evaluation. Net loans and leases as of the same date were \$53.3 million and represented 71.6% of total assets.

The bank's assessment area consists of portions of Lucas County and Fulton County in Ohio and Lenawee County and Monroe County in Michigan. The bank currently has three full-service branches and one cash-only ATM:

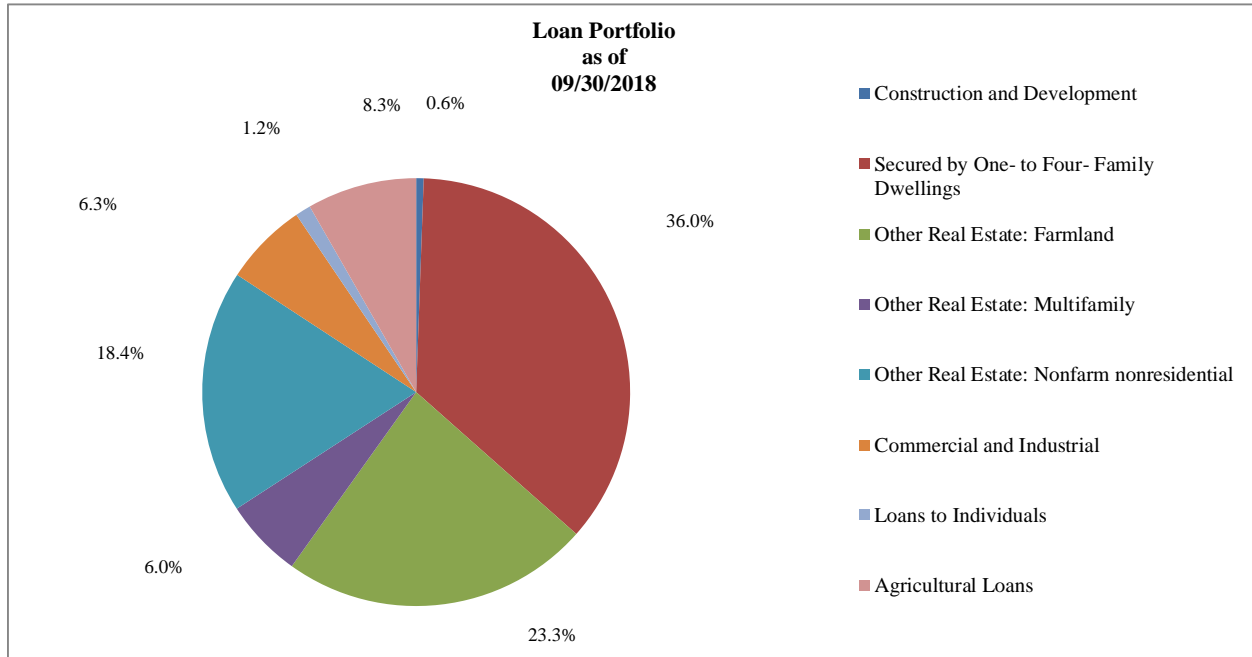
- Metamora Banking Center located in Metamora, Ohio(main office)
- Sylvania Banking Center located in Sylvania, Ohio
- Maumee Banking Center located in Maumee, Ohio (opened February 2019)
- A cash-only ATM at Evergreen High School, located in Metamora, Ohio

The bank defines its market area in the state of Ohio as the village of Metamora, the city of Sylvania, the city of Maumee, and includes surrounding communities of Assumption, Berkey, and Richfield Center. The bank's market area for the state of Michigan includes the communities of Blissfield, Jasper, and Ottawa Lake. As of February 2019, the bank expanded its assessment area, with an additional eight census tracts due to their new branch opening in the city of Maumee. The eight additional tracts were considered in the evaluation of lending for this institution.

The following table and chart illustrate the volume and distribution of loans originated within Metamora's assessment area of September 30, 2018:

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	9/30/2018		12/31/2017		12/31/2016	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	299	0.6%	481	0.9%	188	0.4%
Secured by One- to Four- Family Dwellings	19,081	36.0%	18,274	35.7%	16,100	34.3%
Other Real Estate: Farmland	12,376	23.3%	11,096	21.7%	10,189	21.7%
Other Real Estate: Multifamily	3,158	6.0%	3,267	6.4%	3,622	7.7%
Other Real Estate: Nonfarm nonresidential	9,760	18.4%	10,234	20.0%	7,713	16.4%
Commercial and Industrial	3,347	6.3%	3,327	6.5%	4,438	9.5%
Loans to Individuals	622	1.2%	423	0.8%	593	1.3%
Agricultural Loans	4,395	8.3%	4,147	8.1%	4,065	8.7%
<i>Total</i>	<i>\$53,038</i>	<i>100.00%</i>	<i>\$51,249</i>	<i>100.00%</i>	<i>\$46,908</i>	<i>100.00%</i>

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



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

DESCRIPTION OF ASSESSMENT AREA

Metamora is located in northwest Ohio and has one assessment area consisting of portions of Fulton County and Lucas County in Ohio and portions of Monroe County and Lenawee County in Michigan, which are situated along the border of Ohio. Lucas and Fulton counties are located in the Toledo Metropolitan Statistical Area (MSA) 45780. Monroe County is part of the Monroe MSA 33780 and Lenawee County is not in a metropolitan statistical area. The bank's assessment area consists of 41 census tracts, two moderate- (4.9%), 23 middle- (56.1%), and 16 upper-income census tracts (39.0%). None of the middle-income tracts are designated as distressed or underserved. It is noted that in 2017, according to the FFIEC's website that provides demographic information for each census tract, indicated that one of the bank's moderate-income tracts in its assessment area had an increase in median family income which moved it from a moderate-income tract to a middle-income tract. Since a majority of the evaluation period encompassed the period when the tract was considered moderate-income, the geographic distribution portion of the lending test was completed with that tract as a moderate-income geography.

Metamora served its assessment area through two banking centers, the main office located in Metamora, Ohio (middle-income tract) and the other in Sylvania, Ohio (upper-income tract); both branches are full-service with ATMs. In February 2019, Metamora opened a new full-service branch located in the city of Maumee in Lucas County. As a result, the bank expanded its assessment area by eight tracts that are composed of the following: one moderate-, three middle-, and four upper-income census tracts. Furthermore, the bank operates a cash-only ATM that is located in Evergreen High School in the village of Metamora.

Fulton County is located on the Michigan border in the northwest portion of the state of Ohio. Fulton County covers 406.8 square miles and the county seat is the city of Wauseon, the largest city in the county. Fulton is primarily rural; urban areas comprise less than one percent of the county. Employment opportunities for local residents are typically in the manufacturing industry with the main products manufactured as steel, aluminum, office furniture, and flashlights. From 2015-2016, employment in Fulton County declined at a rate of 2.1%. According to the U.S. Census Bureau, the population of Fulton County in 2010 was 42,698 and 42,289, according to the 2017 U.S. Census estimates. In addition, only 17.3% of the population aged 25 years or older hold a bachelor's degree or higher in the county. The Metamora assessment area contains four middle-income census tracts in Fulton County.

Lucas County is located in the northwest portion of Ohio and covers 340.8 square miles. The county's northern border lies along the Michigan state line. The county seat of Lucas County is Toledo and the county's next largest community is Sylvania Township.

According to the U.S. Census Bureau, the population of Lucas County in 2010 was 441,815 and 430,887 according to the 2017 U.S. Census estimates. In addition, only 25.6% of the population aged 25 years or older hold a bachelor's degree or higher.

Lenawee County is located in southeast Michigan and borders northwest Ohio. The largest city and county seat is the city of Adrian. The economy of Lenawee County is specialized in manufacturing, agriculture, forestry, fishing, hunting, and health care and social assistance.¹ According to the U.S. Census Bureau, the population of Lenawee County in 2010 was 99,892 and 98,623, according to the 2017 U.S. Census estimates. According to the U.S. Census Bureau, only 20.6% of the population aged 25 years or older hold a bachelor's degree or higher. The Metamora assessment area includes two middle- and one upper-income census tracts in Lenawee County.

Monroe County is located in southeast Michigan and borders Ohio. Monroe County is located between the city of Detroit (north) and the city of Toledo (south). The largest industries in the county are manufacturing, healthcare and social assistance and retail trade. In addition, Monroe County is the world headquarters of La-Z-Boy Incorporated.² According to the U.S. Census Bureau, the population of Monroe in 2010 was 152,021 and 149,659 according to the 2017 U. S. Census estimates. The Metamora assessment area includes one middle-income census tract in Monroe County.

As of December 31, 2018, the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report ranked Metamora 16th out of 16 institutions in Fulton, Lucas, Lenawee, and Monroe counties with three offices and a market share of 0.5%. The following top three largest institutions by deposit share are larger regional institutions: Fifth Third Bank (21.1%); Huntington National Bank (18.7%); and KeyBank (10.4%).

1 <http://datausa.io/profile/geo/Lenawee-county-mi>

2 <http://datausa.io/profile/geo/Monroe-county-mi>

#	Financial Institution	Deposit Market Share
1	Fifth Third Bank	21.14%
2	The Huntington National Bank	18.68%
3	KeyBank National Association	10.38%
4	PNC Bank, National Association	8.26%
5	Monroe Bank & Trust	7.92%
6	Signature Bank, National Association	6.14%
7	Citizens Bank, National Association	5.34%
8	Waterford Bank, N.A.	4.72%
9	First Federal Bank of the Midwest	4.19%
10	The Farmers & Merchants State Bank	4.03%
11	Old National Bank	3.11%
12	First Federal Savings and Loan Association	1.19%
13	The Genoa Banking Company	0.98%
14	Blissfield State Bank	0.74%
15	The State Bank and Trust Company	0.69%
16	The Metamora State Bank	0.52%

Community Contacts

Two community contact interviews were conducted to provide additional information regarding credit needs of the local community and context to the demographic and economic characteristics discussed.

An interview was conducted with a private agency that was created to combat poverty in Fulton County. The agency employs 142 people and has annual funding of \$8 million from federal and state grants. Programs and services offered to the community include: early childhood education, emergency services, utility assistance, homelessness, housing, nutrition services, home weatherization and repair, financial empowerment, publicly funded childcare, free tax preparation, affordable housing, and emergency shelter and rapid rehousing for homeless. According to the director of the agency, the economic conditions for Fulton County are stable; however, the cost of homelessness continues to be a problem. While the director admits that the number of those who are homeless are not above the national average, nor equal to the larger cities, homelessness is a problem that expands past the issue of finding housing and includes preventative and therapeutic costs to treat the underlying issues of the individuals. The director also stated that financial empowerment continues to be a need in the county, as those households born in poverty tend to remain in poverty through successive generations. The agency is attempting to work with financial institutions to match dollar for dollar in savings accounts for those living in poverty, as well as asking them to conduct financial classes and be a general resource to the public. The cost of running the financial empowerment program is typically funded by donations that pay for the salary of the employees running the financial empowerment program. The director indicated that recently they have had trouble finding the funds to continue to pay their employees and are looking for financial institutions to step forward and assist.

The director stated that their organization has not had much participation from the local banking institutions, as the institutions tend to be more reactive to the issues and also do not employ innovative thinking when approaching the needs of the community. The director further stated that many local institutions have been approached with the idea that their funding and services would qualify for CRA credit; however, even with the possibility of CRA credit local institutions have not been as active in the community. The director stated that the credit unions have been the most active in their community, as they are innovative and are more likely to promote, sponsor, and fund activities that help the community.

The other interview was conducted with an economic development company that serves Lucas County. The company provides services that are targeted to meet the needs of both area employers and job-seekers. The agency coordinates, facilitates, and documents the economic activities into a one-stop system that includes a partnership with county government, non-profit, and private sector workforce and economic development organizations. The staff of this company work in cooperation with these service providers to help job-seekers find quality employment, employed workers find better jobs, and businesses to find skilled and job-ready employees. Funding for this organization is through the government as well as a smaller percent through private sources, such as financial institutions. According to their company, the county continues to see a large investment in the area, especially in the area of information technology. Employment is at an all-time low; however, those individuals that are currently unemployed represent a workforce that does not have the skill sets needed to fill the open positions in this new economy. Thus, the community contacts noted that this continues to be an area of difficulty for Lucas County; as a result, the organization's goal is to provide training and workforce development to increase the amount of skilled, employable workers. According to the contact, the economy of Lucas County continues to grow and with it they feel that financial institutions are keeping up with the need for more investment into the community. The company has developed solid relationships with local financial institutions. This partnership with local financial institutions allows their agency to recommend the financial institution that would best meet their customers' specific needs. According to the contact, the local institutions specialize in different types of lending and services and the strong amount of banking competition allows for more innovative and diverse solutions to funding. While the contact feels that financial institutions are serving the business needs of the community, the contact indicated that small dollar loans are still the preferred source as small businesses need the most financial support; thus the contacts would like to see more institutions investing in small businesses with an emphasis on smaller dollar loans.

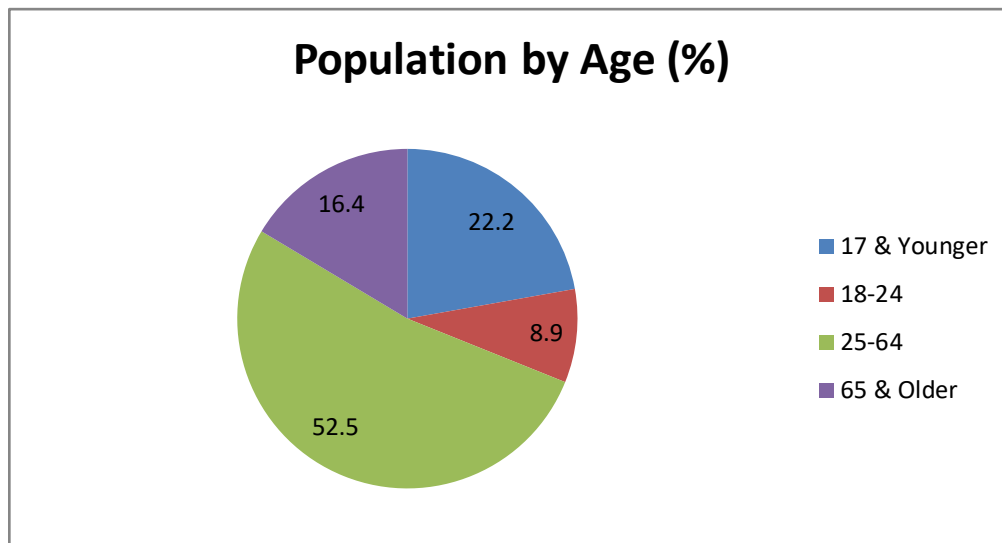
Based on these community contacts, it appears that financial institutions are active in the community but there are opportunities for local institutions to employ more innovative strategies to meet the variety of needs in the assessment area.

Population Characteristics

The U.S. Census Bureau estimates from 2015 show the population in the assessment area was 200,088 with 2.7% of the population in moderate tract, 45.1% residing in middle-income tracts and 52.2% in upper-income tracts. The chart below shows the population change for the entirety of each county that makes up a portion of the assessment area based on 2010 and 2017 Census Bureau data.

County	2010 Population	2017 Population	Population Percent Change
Lenawee County	99,892	98,623	-1.3%
Monroe County	152,021	149,649	-1.6%
Fulton County	42,698	42,289	-1.0%
Lucas County	441,815	430,887	-2.5%
Total	736,426	721,448	

Additionally, 77.8% of the populations in the assessment area is 18 years of age or older, the legal age to enter into a contract. Of the population that is at least 18 years of age, 61.4% are within the ages of 18 to 64 which are prime ages for lending; whereas, 16.4% of those at least 18 years of age are 65 and over. The table below provides a further breakdown of the population by age.



Income Characteristics

According to data from the 2015 U.S. Census Bureau, the median family income level for Metamora’s assessment area was \$73,765, which is 17.4% above Ohio’s median family income of \$62,817 and 18.5% above Michigan’s median family income of \$62,247. The 2014-2018 estimated median family income levels for the Toledo MSA, Monroe MSA, Non-Metropolitan Ohio and Non-Metropolitan Michigan are detailed in the following tables:

**Borrower Income Levels
Toledo, OH - MSA**

HUD Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2014	\$60,800	0	-	\$30,399	\$30,400	-	\$48,639	\$48,640	-	\$72,959	\$72,960	-	& above
2015	\$61,700	0	-	\$30,849	\$30,850	-	\$49,359	\$49,360	-	\$74,039	\$74,040	-	& above
2016	\$61,000	0	-	\$30,499	\$30,500	-	\$48,799	\$48,800	-	\$73,199	\$73,200	-	& above
2017	\$61,500	0	-	\$30,749	\$30,750	-	\$49,199	\$49,200	-	\$73,799	\$73,800	-	& above
2018	\$67,200	0	-	\$33,599	\$33,600	-	\$53,759	\$53,760	-	\$80,639	\$80,640	-	& above

**Borrower Income Levels
Monroe, MI - MSA**

HUD Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2014	\$63,800	0	-	\$31,899	\$31,900	-	\$51,039	\$51,040	-	\$76,559	\$76,560	-	& above
2015	\$65,000	0	-	\$32,499	\$32,500	-	\$51,999	\$52,000	-	\$77,999	\$78,000	-	& above
2016	\$69,200	0	-	\$34,599	\$34,600	-	\$55,359	\$55,360	-	\$83,039	\$83,040	-	& above
2017	\$71,600	0	-	\$35,799	\$35,800	-	\$57,279	\$57,280	-	\$85,919	\$85,920	-	& above
2018	\$75,100	0	-	\$37,549	\$37,550	-	\$60,079	\$60,080	-	\$90,119	\$90,120	-	& above

**Borrower Income Levels
Ohio State Non-Metro**

HUD Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2014	\$55,700	0	-	\$27,849	\$27,850	-	\$44,559	\$44,560	-	\$66,839	\$66,840	-	& above
2015	\$56,900	0	-	\$28,449	\$28,450	-	\$45,519	\$45,520	-	\$68,279	\$68,280	-	& above
2016	\$55,400	0	-	\$27,699	\$27,700	-	\$44,319	\$44,320	-	\$66,479	\$66,480	-	& above
2017	\$57,600	0	-	\$28,799	\$28,800	-	\$46,079	\$46,080	-	\$69,119	\$69,120	-	& above
2018	\$61,400	0	-	\$30,699	\$30,700	-	\$49,119	\$49,120	-	\$73,679	\$73,680	-	& above

**Borrower Income Levels
Michigan State Non-Metro**

HUD Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2014	\$53,900	0	-	\$26,949	\$26,950	-	\$43,119	\$43,120	-	\$64,679	\$64,680	-	& above
2015	\$54,700	0	-	\$27,349	\$27,350	-	\$43,759	\$43,760	-	\$65,639	\$65,640	-	& above
2016	\$52,600	0	-	\$26,299	\$26,300	-	\$42,079	\$42,080	-	\$63,119	\$63,120	-	& above
2017	\$55,800	0	-	\$27,899	\$27,900	-	\$44,639	\$44,640	-	\$66,959	\$66,960	-	& above
2018	\$58,700	0	-	\$29,349	\$29,350	-	\$46,959	\$46,960	-	\$70,439	\$70,440	-	& above

The assessment area contains 81,443 households, of which 51,850 (63.7%) are designated as families. Low- and moderate-income families represent 14.7% and 14.9% of all families in this assessment area, respectively, with 8.1% of families below the poverty level, compared to the state of Ohio's rate of 11.5% and the state of Michigan's rate of 11.9%.

According to the 2015 data from the U.S. Census Bureau's Small Area Income and Poverty Estimates (SAIPE), household poverty rates for Fulton, Lucas, Lenawee, and Monroe counties were as follows:

County	2016 Poverty Rate	2017 Poverty Rate	Change
Fulton	8.90%	8.20%	-7.87%
Lucas	19.80%	17.90%	-9.60%
Lenawee	12.50%	10.40%	-16.80%
Monroe	10.00%	11.70%	17.00%
Ohio	14.50%	13.90%	-4.14%
Michigan	14.90%	14.10%	-5.37%
United States	14.00%	13.40%	-4.29%

The area’s poverty rates are generally lower than those for the states and national rates, however, the 2017 poverty rate in Lucas County of 17.9% is 28.8% higher than the state of Ohio, 26.9% higher than the State of Michigan and 27.8% higher than the national poverty rate. Thus, individuals residing in Lucas County could encounter difficulty obtaining bank loans due to insufficient financial resources.

Labor, Employment and Economic Characteristics

According to the Ohio Office of Policy, Research and Strategic Planning, the largest industries by average employment for Fulton County and Lucas County are: goods producing; trade, transportation, and utilities; and education and health services.

According to the Detroit Chamber of Commerce, the largest industries by average employment for Lenawee County and Monroe County are: manufacturing and health services.

The following table identifies the employment sectors and major employers in Metamora’s assessment area:

County	Primary Employment Sectors	Major Employers
Fulton (OH)	Goods Producing; Trade, Transportation and Utilities; Education and Health Services; Leisure and Hospitality	ConAgra; Haas Door Company; International Automotive Components; North Star BlueScope Steel; Sauder Woodworking Co.; TRW Automotive; Fulton County Health Center;
Lucas (OH)	Goods Producing; Trade Transportation and Utilities; Financial Services; Professional and Business Services; Education and Health Services; Leisure and Hospitality	Mercy Health Partners; United Parcel Service Inc.; University of Toledo; Promedica Health System; Owens Corning; Toledo City Schools; Andersons Inc.; Fiat Chrysler Automobiles US
Lenawee (MI)	Manufacturing; Health Services	Inteva Products, LLC; ProMedica Health System-North Region; Wacker Chemical-Adrian; Hi-Lex Controls; KIRCHHOFF Van-Rob
Monroe (MI)	Manufacturing; Utilities; Healthcare; Transportation and Warehousing	La-Z-Boy; Centuar Inc.; Mercy Memorial Hospital; National Galvanizing LP

The following table shows the 2014-2017 average annual unemployment rates for Fulton and Lucas counties in Ohio and Lenawee and Monroe counties in Michigan compared to the state of Ohio, state of Michigan, and national unemployment rates.

Unemployment Rates
Assessment Area: Metamora State Bank

Area	Years - Annualized			
	2014	2015	2016	2017
Fulton County, OH	5.2	4.8	4.9	4.5
Lucas County, OH	5.6	5.0	5.1	5.1
Toledo, OH MSA	5.3	4.8	4.9	4.8
Monroe, County, MI	4.4	3.7	3.8	4.1
Monroe, MI MSA	4.4	3.7	3.8	4.1
Lenawee, County, MI	5.1	4.0	4.1	4.2
Ohio	4.9	4.7	5.0	4.5
Michigan	5.6	4.5	4.6	4.4
National	5.4	4.8	4.5	3.9

Not Seasonally Adjusted
Data extracted on November 7, 2018

The unemployment rate for Fulton County was equal to or slightly above the state of Ohio for three of the four years. The unemployment rate for Lucas County was consistently above the unemployment rate for the state of Ohio. In addition the Toledo, Ohio MSA was generally above the state of Ohio and above the national unemployment rates in 2016 and 2017. Monroe County Michigan which is part of the Monroe MSA was consistently below the state of Michigan for each of the four years. . Finally, Lenawee County was consistently below the state of Michigan and the national unemployment rates except for the year 2017 when the national unemployment rate was less than that of Lenawee County.

Housing Characteristics

There were 86,734 housing units in the assessment area based on 2015 U.S. Census Bureau estimates. Within the assessment area, 64.8% of the units were owner-occupied, 29.1% were rental units, and 6.1% were vacant. The owner-occupancy rate of the assessment area is 9.6% higher than the State of Ohio’s rate of 59.1%, and 7.8% higher than the State of Michigan’s rate of 60.1%. Of the total housing units, 3.2% are located in moderate-, 48.0% are located in middle-, and 48.8% are located in upper-income tracts.

According to the 2015. U.S. Census Bureau estimates, the median age of the housing stock in the assessment area was 47 years, with 17.0% built before 1950. In comparison, the median statewide age for Ohio was comparable at 48 years and for Michigan was 46 years. The oldest housing stock was in Lucas County with a median age of 57 years, while the newest was 43 years in Monroe County.

The median housing value in the assessment area was \$150,125, with an affordability ratio of 38.2%. The higher the affordability ratio, the more affordable a home is considered. The housing affordability ratio is calculated by dividing the median household income by the median housing value. The housing affordability ratio in the assessment area is almost equal to the State of Ohio affordability ratio at 38.1% and slightly lower than the State of Michigan’s at 40.5%. Furthermore, the assessment area’s affordability ratio is slightly lower than the Monroe Michigan MSA (40.6%), Toledo Ohio MSA (39.5%), and Non-MSA Ohio (39.0%) ratios.

According to RealtyTrac³, foreclosure rates in Fulton and Lucas counties were 0.11% and 0.03% compared to the foreclosure rate for Ohio at 0.06%. Foreclosure rates for Monroe and Lenawee counties were 0.03% and 0.04%, compared to the foreclosure rate for Michigan at 0.02%. The national foreclosure rate was 0.04%.

Geography Name	Foreclosed Properties in (January, 2019)	Ratio of Properties Receiving Foreclosure Filings in (January, 2019)
Lucas	210	1:931
Fulton	5	1:2850
Lenawee	12	1:2739
Monroe	15	1:2969
Ohio	3,200	1:1600
Michigan	1,200	1:3858
United States	58,000	1:2348

According to Sperling's Best Places⁴. The median cost of a home in Lucas and Fulton County in Ohio is \$101,400 and \$138,500, respectively. In addition, the median cost of a home in Lenawee and Monroe County in Michigan was \$135,900 and \$160,700, respectively. Given the median family income for the assessment area the median costs of homes are comparable.

The median gross rent in the assessment area was \$732, which was slightly above the State of Ohio's average gross rents at \$730 and below the state of Michigan's gross rents at \$783. In the assessment area 51.3% of gross rents are higher than \$700.

The following tables further illustrate the demographics of Metamora's assessment area.

3 <http://www.realtytrac.com/trendcenter/>

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

Combined Demographics Report

Assessment Area(s): Metamora 2014

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	7,407	14.3	
Moderate-income	2	4.9	2,467	4.7	310	12.6	7,378	14.2	
Middle-income	23	56.1	25,793	49.6	2,116	8.2	10,276	19.8	
Upper-income	16	39.0	23,694	45.6	857	3.6	26,893	51.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	41	100.0	51,954	100.0	3,283	6.3	51,954	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate-income	5,219	2,272	3.9	43.5	2,242	43.0	705	13.5	
Middle-income	45,422	28,143	48.9	62.0	13,792	30.4	3,487	7.7	
Upper-income	34,590	27,158	47.2	78.5	5,422	15.7	2,010	5.8	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	85,231	57,573	100.0	67.5	21,456	25.2	6,202	7.3	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	347	3.4	303	3.4	27	3.2	17	4.3	
Middle-income	4,667	46.0	4,125	46.3	375	45.0	167	42.5	
Upper-income	5,128	50.6	4,488	50.3	431	51.7	209	53.2	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	10,142	100.0	8,916	100.0	833	100.0	393	100.0	
Percentage of Total Businesses:				87.9		8.2		3.9	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	1	0.3	1	0.3	0	0.0	0	0.0	
Middle-income	233	65.3	228	65.0	5	83.3	0	0.0	
Upper-income	123	34.5	122	34.8	1	16.7	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	357	100.0	351	100.0	6	100.0	0	.0	
Percentage of Total Farms:				98.3		1.7		.0	

2014 FFIEC Census Data and 2014 D&B Information

Combined Demographics Report

Assessment Area(s): Metamora 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	7,407	14.3	
Moderate-income	2	4.9	2,467	4.7	310	12.6	7,378	14.2	
Middle-income	23	56.1	25,793	49.6	2,116	8.2	10,276	19.8	
Upper-income	16	39.0	23,694	45.6	857	3.6	26,893	51.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	41	100.0	51,954	100.0	3,283	6.3	51,954	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate-income	5,219	2,272	3.9	43.5	2,242	43.0	705	13.5	
Middle-income	45,422	28,143	48.9	62.0	13,792	30.4	3,487	7.7	
Upper-income	34,590	27,158	47.2	78.5	5,422	15.7	2,010	5.8	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	85,231	57,573	100.0	67.5	21,456	25.2	6,202	7.3	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low-income	0	0	0.0	0	0.0	0	0.0		
Moderate-income	366	334	3.5	32	3.4	0	0.0		
Middle-income	4,840	4,389	45.6	45.7	426	45.0	25	43.9	
Upper-income	5,401	4,880	50.9	50.8	489	51.6	32	56.1	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	10,607	9,603	100.0	100.0	947	100.0	57	100.0	
Percentage of Total Businesses:				90.5		8.9		.5	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low-income	0	0	0.0	0	0.0	0	0.0		
Moderate-income	1	1	0.3	0	0.0	0	0.0		
Middle-income	218	212	64.1	63.9	6	75.0	0	0.0	
Upper-income	121	119	35.6	35.8	2	25.0	0	0.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	340	332	100.0	100.0	8	100.0	0	.0	
Percentage of Total Farms:				97.6		2.4		.0	

2015 FFIEC Census Data and 2015 D&B Information

Combined Demographics Report

Assessment Area(s): Metamora 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	7,407	14.3
Moderate-income	2	4.9	2,467	4.7	310	12.6	7,378	14.2
Middle-income	23	56.1	25,793	49.6	2,116	8.2	10,276	19.8
Upper-income	16	39.0	23,694	45.6	857	3.6	26,893	51.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	41	100.0	51,954	100.0	3,283	6.3	51,954	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	5,219	2,272	3.9	43.5	2,242	43.0	705	13.5
Middle-income	45,422	28,143	48.9	62.0	13,792	30.4	3,487	7.7
Upper-income	34,590	27,158	47.2	78.5	5,422	15.7	2,010	5.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	85,231	57,573	100.0	67.5	21,456	25.2	6,202	7.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	326	3.4	290	3.5	35	3.5	1	1.1
Middle-income	4,317	45.6	3,830	45.8	443	43.7	44	46.8
Upper-income	4,833	51.0	4,249	50.8	535	52.8	49	52.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	9,476	100.0	8,369	100.0	1,013	100.0	94	100.0
Percentage of Total Businesses:			88.3		10.7		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1	0.3	1	0.3	0	0.0	0	0.0
Middle-income	191	63.7	184	63.2	7	77.8	0	0.0
Upper-income	108	36.0	106	36.4	2	22.2	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	300	100.0	291	100.0	9	100.0	0	.0
Percentage of Total Farms:			97.0		3.0		.0	

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area(s): Metamora 2017

Income ⁸⁷⁾ Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	7,639	14.7
Moderate-income	1	2.4	1,322	2.5	221	16.7	7,711	14.9
Middle-income	21	51.2	22,707	43.8	2,769	12.2	9,872	19.0
Upper-income	19	46.3	27,821	53.7	1,208	4.3	26,628	51.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	41	100.0	51,850	100.0	4,198	8.1	51,850	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	2,834	540	1.0	19.1	2,194	77.4	100	3.5
Middle-income	41,597	24,507	43.6	58.9	14,113	33.9	2,977	7.2
Upper-income	42,303	31,167	55.4	73.7	8,922	21.1	2,214	5.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	86,734	56,214	100.0	64.8	25,229	29.1	5,291	6.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	178	2.1	155	2.1	21	2.1	2	2.3
Middle-income	3,429	40.4	3,031	41.0	369	37.0	29	33.7
Upper-income	4,875	57.5	4,214	56.9	606	60.8	55	64.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8,482	100.0	7,400	100.0	996	100.0	86	100.0
Percentage of Total Businesses:				87.2		11.7		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1	0.4	1	0.4	0	0.0	0	0.0
Middle-income	134	48.4	129	48.1	5	55.6	0	0.0
Upper-income	142	51.3	138	51.5	4	44.4	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	277	100.0	268	100.0	9	100.0	0	.0
Percentage of Total Farms:				96.8		3.2		.0

2017 FFIEC Census Data and 2017 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Metamora’s performance under the lending test is rated “Satisfactory.” The loan-to-deposit ratio is reasonable. Metamora made a majority of its loans inside its assessment area. The borrower distribution of lending is excellent, while the geographic distribution is reasonable.

Loan-to-Deposit Ratio

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

Metamora’s loan-to-deposit ratio is reasonable given the bank’s size, financial condition, and assessment area credit needs. The bank has averaged 79.97% over the past 16 quarters of operation and compares to the peer group average ratio of 80.0%.⁵ Metamora’s loan-to-deposit ratio has fluctuated throughout the evaluation period with the highest loan-to-deposit ratio as of September 18, 2015 of 88.15% to its lowest loan-to-deposit ratio of 71.98% as of March 31, 2017. Since March 31, 2017, Metamora’s loan-to-deposit ratio has steadily increased.

The following table shows Metamora’s quarterly loan-to-deposit ratios for 16 quarters since the previous evaluation, along with the average loan-to-deposit for the same period.

Metamora State Bank Loan-to-Deposit Ratios					
AS OF DATE	METAMORA ST BK	STATE B&TC	FIRST FS&LA	WATERFORD BK NA	CUSTOM PEER
September 30, 2018	80.91	95.72	61.35	88.67	81.91
June 30, 2018	82.33	97.71	59.83	91.09	82.88
March 31, 2018	80.09	92.34	60.08	86.43	79.62
December 31, 2017	79.46	94.51	60.81	85.54	80.29
September 30, 2017	77.15	93.71	62.62	78.64	78.32
June 30, 2017	74.90	91.72	62.01	79.75	77.83
March 31, 2017	71.98	86.98	60.98	81.00	76.32
December 31, 2016	73.80	94.49	62.33	82.71	79.84
September 30, 2016	74.59	92.52	63.35	79.70	78.52
June 30, 2016	82.05	92.47	63.61	90.03	82.04
March 31, 2016	82.86	89.31	63.01	95.72	82.68
December 31, 2015	84.17	93.63	60.52	94.33	82.83
September 30, 2015	88.15	92.89	62.02	79.99	78.30
June 30, 2015	86.47	91.62	61.03	83.27	78.64
March 31, 2015	78.96	87.21	59.58	92.51	79.77
December 31, 2014	81.66	91.26	58.82	90.75	80.28
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation	79.97	92.38	61.37	86.26	80.00

Lending in the Assessment Area

Metamora’s small business, home equity, consumer, and residential real estate loans were analyzed to determine the volume of lending inside and outside its assessment area. The following table shows the distribution of loans made inside and outside Metamora’s assessment area.

⁵ National peer group consists of all commercial banks having assets between \$100 and \$300 million in nonmetropolitan areas with three or more full service offices.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Equity	66	91.7	\$3,694	94.4	6	8.3	\$218	5.6
Motor Vehicle	14	70.0	\$170	77.7	6	30.0	\$49	22.3
Other - Secured	32	86.5	\$346	93.4	5	13.5	\$24	6.6
Other - Unsecured	1	100.0	\$15	100.0	0	0.0	\$0	0.0
Residential Loans	20	83.3	\$2,298	74.4	4	16.7	\$791	25.6
Total Consumer related	133	86.4	\$6,523	85.8	21	13.6	\$1,082	14.2
Home Improvement	3	75.0	\$35	33.3	1	25.0	\$70	66.7
Home Purchase - Conventional	17	89.5	\$1,936	97.2	2	10.5	\$56	2.8
Multi-Family Housing	2	28.6	\$504	15.5	5	71.4	\$2,742	84.5
Refinancing	9	90.0	\$535	71.8	1	10.0	\$210	28.2
Total HMDA related	31	77.5	\$3,010	49.4	9	22.5	\$3,078	50.6
Small Business	140	79.1	\$18,141	54.1	37	20.9	\$15,420	45.9
Total Small Bus. related	140	79.1	\$18,141	54.1	37	20.9	\$15,420	45.9
TOTAL LOANS	304	81.9	\$27,675	58.6	67	18.1	\$19,580	41.4

As the table indicates, a majority of (81.9% by volume) of Metamora's loans were made inside its delineated assessment area. The loans originated within the assessment area, however, only account for 58.6% of the dollar amount of loans originated. By dollar amount: 85.8% of the consumer loans were made inside the assessment area; 49.4% of HMDA loans were made inside the assessment area; however, only 54.1% of small business loans were made inside of the assessment area. The lower percentage of small business loans by dollar amount made inside the assessment area is indicative of Metamora's activity in loan participations which are typically higher dollar amount loans.

Borrower Distribution of Lending

Metamora's lending to borrowers of different income levels and lending to businesses of different revenue sizes is considered excellent. Lending to small businesses that had gross revenues of \$1 million or less is excellent. The borrower distribution of home equity is considered reasonable HMDA/residential real estate and consumer loans (including motor vehicle, secured, and other secured) is excellent.

Small Business

Metamora originated 140 loans to small businesses, and of those loans 78 (55.7%) were made to businesses with gross revenues of \$1 million which was slightly below the percentage of total businesses at 88.3% (proxy) in the bank's assessment area.

According to lending data, of the 140 total small business loans originated in the assessment area, 62.1% were extended in an amount of \$100,000 or less, 23.6% of business loans were for amounts greater than \$100,000, but less than or equal to \$250,000, and 14.3% of business loans were for

amounts greater than \$250,000, but less than equal to \$1 million. It is further noted that Metamora made zero business loans for amounts greater than \$1 million. Smaller loans are generally commensurate with the borrowing needs of smaller businesses. A majority of the businesses in the assessment reported revenues of less than or equal to \$1 million, therefore, the bank's small dollar amount lending would have had a greater impact to these types of businesses and to the assessment area. Thus the bank's lending to businesses with gross revenues of \$1 million or less is excellent.

Home Equity

Metamora originated a total of 44 home equity loans during the evaluation period. Of those 44 loans, two loans (4.5%) were made to low-income borrowers which was significantly below the percentage of families by family income (proxy) at 14.3%. In addition, the bank made seven loans to moderate-income borrowers (15.9%) which was slightly above the proxy of 14.2%. Metamora's lending to middle-income borrowers was 18.2% which was below the proxy of 19.8%. Lastly, lending to upper-income borrowers was 61.4% which was above the proxy of 51.8%. While lending to low-income borrowers was below the proxy, according to the 2010 Census Bureau, the median housing value for the assessment area was \$163,572 and the median family income for the assessment area was \$70,899. Low-income borrowers would typically have difficulty in affording homes with an average value of \$163,572 and 81.4% of the housing available is valued at \$100,000 or more. Furthermore, of the housing available in the assessment area, 25.2% are rental units and 7.3% are vacant units, further reducing Metamora's ability to originate home equity loans. Thus, Metamora's home equity lending to borrowers of different income levels is considered reasonable.

HMDA/Residential Real Estate

Metamora originated a total of 44 loans to borrowers of different income levels during the evaluation period. Metamora originated 9.1% of its loans to low-income borrowers which was below the percentage of families by family income (proxy) at 14.3%; Metamora's lending to low-income borrowers was significantly above the percentage of lending completed by all aggregate lenders at 5.0%. Metamora originated 15.9% of its loans to moderate-income borrowers, which was slightly above the proxy of 14.2% and slightly above the aggregate of all lenders at 14.4%. Lending to middle-income borrowers at 20.5% was slightly above the proxy of 19.8% and below the aggregate of all lenders (22.2%). Lending to upper-income borrowers at 54.5% was above the proxy at 51.8% and above the aggregate of all lenders at 45.5%. Metamora's borrower distribution of residential real estate lending is excellent given that 25.0% of its lending was originated to low- and moderate-income borrowers. Given that Metamora is in a competitive market and a quarter of their loans were made to low- and moderate-income borrowers compared to its peers demonstrates Metamora's excellent lending performance.

Consumer

Metamora originated 46 consumer loans during the evaluation period. Of the 46 loans, 26.1% were made to low-income borrowers, which was significantly above the percentage of households by household income (proxy) of 17.7%. Metamora originated 26.1% of its consumer loans to

moderate-income borrowers, which was significantly above the proxy of 15.2%. Lending to middle-income borrowers at 28.3% exceeded proxy of 15.7% and lending to upper-income borrowers at 19.6% was significantly below the proxy at 51.4%. Therefore, Metamora’s consumer lending to borrowers of different levels is considered excellent.

Geographic Distribution of Lending

Metamora’s geographic distribution of lending is considered reasonable. Metamora had only one moderate-income tract in its assessment area for the 2014-2016 lending period. According to the geocoding information from the FFIEC, the moderate income tract income in 2016 was 77% of HUD’s MFI making it a moderate income tract. Beginning in 2017, however, the demographics of that tract changed to 94% of HUD’s MFI thus moving the tract to a middle-income geography. A second moderate-income tract was added to the bank’s assessment area after the bank opened its new branch in Maumee, Ohio on February 14, 2019.

As referenced in the chart below, while the analysis revealed some gaps in the bank’s levels of lending in its assessment area, the bank had a reasonable penetration making loans in 85.4% of its geographies.

Tract Income Level	Number of Tracts	Number of Tracts with Loans	% of Tracts with Loans
Moderate	2	2	100.0%
Middle	23	18	78.3%
Upper	16	15	93.8%
Total	41	35	85.4%

The bank made no loans in five middle-income tracts and one upper-income tract for the evaluation period. It is noted, that despite the bank’s addition of eight census tracts to its assessment area in February 2019 due to the opening of its new branch, none of these new census tracts make up the tracts where no loans were originated. Of the census tracts with no loans, four of the five middle-income tracts and the one upper income tract are located in the state of Ohio, while only one middle-income tract in the state of Michigan that had zero loans. The middle-income tract in Michigan is located in Lenawee County and the bank has no branches in the county that may impact the bank’s ability to lend in this tract. It is noted that this tract is not distressed or underserved and within the tract there are 807 owner-occupied units and a small population of 2,539. The remaining census tracts with no loans are located in the Toledo, Ohio MSA in Lucas County. A review of the census demographic information indicates that these tracts are not distressed or underserved and have at the least 86% of MFI and at the most 240% of MFI.

It is also noted that these tracts are located in Lucas County where the city of Toledo is located and is part of the Toledo OH MSA. Competition in the Toledo MSA is much higher as larger regional banks appear to be very ingrained in the credit culture for this area which can make it difficult for a bank of Metamora's size to compete. The regional banks offer a variety of programs and competitive rates.

Small Business Lending

An analysis of small business lending was conducted to determine the extent of lending to business located in Metamora's moderate-, middle-, and upper-income census tracts. The geographic distribution of small business loans is considered reasonable.

Metamora originated 140 small business loans in the assessment area during the review period. Of the 140 loans, no loans were made in the bank's two moderate-income tracts, 64 in middle-income and 76 in upper-income tracts. Metamora's performance was compared to the number of businesses within the assessment area (proxy).

Metamora's performance of lending to businesses within its moderate-income tracts was significantly below the proxy at 3.4%, given that the bank originated zero loans in the tracts. The bank's small business lending in middle-income tracts at 45.7% was slightly above the proxy at 45.6%. Lending to small businesses in upper-income tracts at 54.3% was above the proxy at 51.0%. While the bank's performance was significantly below the proxy in its moderate income tracts, it is noted that the percentage of businesses was also significantly low in those tracts, thus limiting the bank's lending opportunities in this tract.

Home Equity Lending

Metamora originated 41 home equity loans in the assessment area during the review period. Metamora's performance was compared to the number of owner-occupied housing units in the assessment (proxy). Of the 41 loans originated, zero loans were made in the bank's moderate-income tracts, 21 loans were made in its middle-income tracts, and 45 loans were made in its upper-income tracts.

Metamora originated zero loans in its moderate-income tracts, which was significantly below the proxy at 3.9%. In its middle-income tracts, the bank originated 31.8% of its loans which was below the proxy at 48.9%. The bank's lending performance in upper-income tracts at 68.2% was above the proxy at 47.2%. While the bank did not make any loans in its moderate income tracts, only 43.5% of the total housing units in those tracts were owner-occupied, of the remaining housing units, 42.9% were rental, and 13.5% were vacant, thus further reducing Metamora's ability to originate home equity loans. In addition, of persons 16 years or older residing in the moderate tracts, 69.7% are part of the labor force; however of those 5,383 persons, 14.8% are unemployed, further reducing the bank's ability to originate home equity loans.

HMDA Lending and Residential Real Estate

Metamora originated 41 loans in the assessment area during the review period. Metamora's performance was compared to the percent of owner occupied housing units in the assessment area (proxy). In addition, peer lending data was also considered in addition to poverty levels, housing affordability, percentage of rental and vacant units and general economic conditions in the assessment area which could limit lending opportunities. Overall, the geographic distribution of HMDA lending and residential real estate is considered excellent.

Metamora originated two loans in its moderate-income tracts (3.9%) and was equal to the proxy at 3.9% and significantly above the aggregate of peer lenders at 2.6%. Metamora's lending in middle-income tracts (54.9%) was above the proxy of 48.9 and above the aggregate of all lenders at 43.3%. In upper-income tracts Metamora performed below the proxy at 41.2% compared to 47.2% and below the aggregate of all lenders at 54.4%.

Consumer Lending

Metamora originated a total of 41 consumer loans in the assessment area during the evaluation period. Of the 41 loans, no loans were made in its moderate-income tracts; 27 were made in middle-income tracts; and 16 were made in upper-income tracts. Metamora's lending was compared to the number of households in the assessment area (proxy). Overall, the geographic distribution of consumer lending is considered reasonable.

Metamora's consumer lending was significantly below the proxy at 5.7% as no loans were originated during the evaluation period in moderate tracts. Metamora originated 57.4% of its consumer loans in middle-income tracts, which was above the proxy at 53.1%. Metamora's lending in upper-income tracts was 42.6%, which was above the proxy of 41.2%. Of the total low-income households, 9.6% reside in the bank's moderate-income tracts and of those households that qualify as moderate-income only 8.4% reside in the moderate tracts. Thus, the majority of low-income households and moderate-income households reside in middle- and upper-income tracts. While no loans were made in its moderate-income tracts, lending in middle- and upper-income tracts reaches low- and moderate-income households.

Response to Consumer Complaints

No CRA-related complaints were filed against Metamora during the evaluation period.

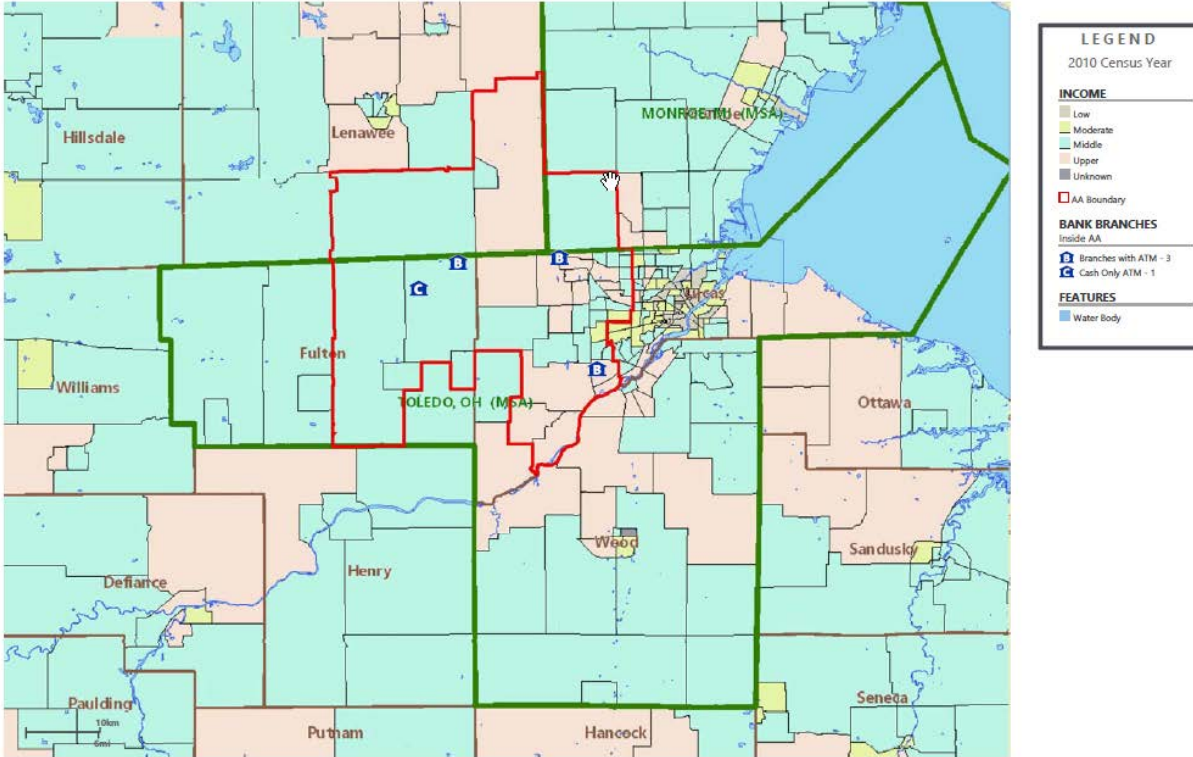
Fair Lending or Other Illegal Credit Practices Review

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

APPENDIX A

ASSESSMENT AREA MAP

2014 Toledo OH MSA



APPENDIX B
APPENDIX B

LENDING TABLES

HMDA Loan Distribution Table

Exam: Metamora 2019

Assessment Area/Group :Metamora 2016								
Income Categories	HMDA				HMDA			
	By Tract Income				By Borrower Income			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	20.0%	75	16.4%	2	20.0%	76	8.3%
Low/Moderate Total	1	20.0%	75	16.4%	2	20.0%	76	8.3%
Middle	1	20.0%	25	5.5%	4	40.0%	208	22.8%
Upper	3	60.0%	357	78.1%	2	20.0%	480	52.5%
Unknown	0	0.0%	0	0.0%	2	20.0%	150	16.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	457	100.0%	10	100.0%	914	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	4	66.7%	182	67.4%
Low/Moderate Total	0	0.0%	0	0.0%	4	66.7%	182	67.4%
Middle	2	66.7%	104	77.0%	0	0.0%	0	0.0%
Upper	1	33.3%	31	23.0%	2	33.3%	88	32.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	135	100.0%	6	100.0%	270	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	20	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	100.0%	40	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	20	100.0%	2	100.0%	40	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals:								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	11.1%	75	12.3%	6	33.3%	258	21.1%
Low/Moderate Total	1	11.1%	75	12.3%	6	33.3%	258	21.1%
Middle	4	44.4%	149	24.3%	4	22.2%	208	17.0%
Upper	4	44.4%	388	63.4%	6	33.3%	608	49.7%
Unknown	0	0.0%	0	0.0%	2	11.1%	150	12.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	612	100.0%	18	100.0%	1,224	100.0%

HMDA Loan Distribution Table

Exam: Metamora 2019

Assessment Area/Group :Metamora 2015								
Income Categories	HMDA				By Borrower Income			
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	6	22.2%	378	11.5%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	6	22.2%	378	11.5%
Middle	8	88.9%	965	88.3%	0	0.0%	0	0.0%
Upper	1	11.1%	128	11.7%	15	55.6%	1,965	59.9%
Unknown	0	0.0%	0	0.0%	6	22.2%	936	28.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	1,093	100.0%	27	100.0%	3,279	100.0%
Refinance								
Low	0	0.0%	0	0.0%	3	25.0%	90	12.4%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	3	25.0%	90	12.4%
Middle	4	100.0%	241	100.0%	6	50.0%	333	46.1%
Upper	0	0.0%	0	0.0%	3	25.0%	300	41.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	241	100.0%	12	100.0%	723	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	10	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	3	100.0%	30	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	10	100.0%	3	100.0%	30	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	504	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	6	100.0%	1,512	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	504	100.0%	6	100.0%	1,512	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	9	18.8%	468	8.4%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	9	18.8%	468	8.4%
Middle	15	93.8%	1,720	93.1%	6	12.5%	333	6.0%
Upper	1	6.3%	128	6.9%	21	43.8%	2,295	41.4%
Unknown	0	0.0%	0	0.0%	12	25.0%	2,448	44.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	1,848	100.0%	48	100.0%	5,544	100.0%

HMDA Loan Distribution Table

Exam: Metamora 2019

Assessment Area/Group :Metamora 2014								
Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	66.7%	305	79.0%	0	0.0%	0	0.0%
Upper	1	33.3%	81	21.0%	8	66.7%	1,220	79.0%
Unknown	0	0.0%	0	0.0%	4	33.3%	324	21.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	386	100.0%	12	100.0%	1,544	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	4	50.0%	280	44.0%
Low/Moderate Total	0	0.0%	0	0.0%	4	50.0%	280	44.0%
Middle	1	50.0%	89	56.0%	4	50.0%	356	56.0%
Upper	1	50.0%	70	44.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	159	100.0%	8	100.0%	636	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	5	100.0%	4	100.0%	20	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	5	100.0%	4	100.0%	20	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	4	16.7%	280	12.7%
Low/Moderate Total	0	0.0%	0	0.0%	4	16.7%	280	12.7%
Middle	4	66.7%	399	72.5%	8	33.3%	376	17.1%
Upper	2	33.3%	151	27.5%	8	33.3%	1,220	55.5%
Unknown	0	0.0%	0	0.0%	4	16.7%	324	14.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	550	100.0%	24	100.0%	2,200	100.0%

CRA Loan Distribution Table

Exam: Metamora 2019

Assessment Area/Group: Metamora 2017

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	17.4%	1,323	25.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	38	82.6%	4,422	74.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	5,945	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	27	58.7%	3,310	55.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	3	6.5%	285	4.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	16	34.8%	2,351	39.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	5,945	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	24	52.2%	1,139	19.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	16	34.8%	2,363	39.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	13.0%	2,444	41.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	5,945	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	15	55.6%	687	20.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	9	33.3%	1,318	39.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	11.1%	1,305	39.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	3,310	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Metamora 2019

Assessment Area/Group: Metamora 2016

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	27	58.7%	2,282	36.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	19	41.3%	4,043	63.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	6,325	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	26	56.5%	2,481	39.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	6	13.0%	2,762	43.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	14	30.4%	1,081	17.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	6,325	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	34	73.9%	1,678	26.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	6	13.0%	799	12.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	13.0%	3,848	60.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	6,325	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	21	80.8%	1,121	45.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	11.5%	329	13.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	7.7%	1,031	41.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	2,481	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Metamora 2019

Assessment Area/Group: Metamora 2015												
Income Category:	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	23	59.0%	2,011	40.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	16	41.0%	2,998	59.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	100.0%	5,009	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	20	51.3%	2,215	44.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	19	48.7%	2,794	55.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	100.0%	5,009	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	23	59.0%	944	18.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	9	23.1%	1,612	32.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	7	17.9%	2,453	49.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	100.0%	5,009	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	12	60.0%	507	22.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	4	20.0%	690	31.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	4	20.0%	1,018	46.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20	100.0%	2,215	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Metamora 2019

Assessment Area/Group: Metamora 2014												
Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	6	66.7%	790	90.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	3	33.3%	82	9.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	863	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	5	55.6%	570	66.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	1	11.1%	50	5.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	3	33.3%	242	28.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	863	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	6	66.7%	221	25.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	22.2%	274	31.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	11.1%	368	42.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	863	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	3	60.0%	79	13.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	20.0%	124	21.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	20.0%	368	64.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	570	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Consumer Loan Distribution Table

Exam: Metamora 2019

Assessment Area/Group Metamora 2017								
	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	5	14.7%	215	12.3%
Low/Moderate Total	0	0.0%	0	0.0%	5	14.7%	215	12.3%
Middle	8	23.5%	248	14.2%	4	11.8%	185	10.6%
Upper	26	76.5%	1,500	85.8%	12	35.3%	873	49.9%
Unknown	0	0.0%	0	0.0%	13	38.2%	476	27.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	34	100.0%	1,748	100.0%	34	100.0%	1,748	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	3	21.4%	9	3.7%
Moderate	0	0.0%	0	0.0%	4	28.6%	95	38.9%
Low/Moderate Total	0	0.0%	0	0.0%	7	50.0%	104	42.6%
Middle	4	28.6%	62	25.3%	4	28.6%	38	15.7%
Upper	10	71.4%	182	74.7%	3	21.4%	102	41.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	244	100.0%	14	100.0%	244	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Residential Loans							
Low	0	0.0%	0	0.0%	1	5.0%	87	3.8%
Moderate	1	5.0%	15	0.7%	3	15.0%	110	4.8%
Low/Moderate Total	1	5.0%	15	0.7%	4	20.0%	196	8.5%
Middle	5	25.0%	351	15.3%	3	15.0%	284	12.4%
Upper	14	70.0%	1,932	84.1%	12	60.0%	1,802	78.4%
Unknown	0	0.0%	0	0.0%	1	5.0%	15	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20	100.0%	2,298	100.0%	20	100.0%	2,298	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	4	5.9%	95	2.2%
Moderate	1	1.5%	15	0.3%	12	17.6%	419	9.8%
Low/Moderate Total	1	1.5%	15	0.3%	16	23.5%	515	12.0%
Middle	17	25.0%	660	15.4%	11	16.2%	507	11.8%
Upper	50	73.5%	3,614	84.3%	27	39.7%	2,777	64.7%
Unknown	0	0.0%	0	0.0%	14	20.6%	491	11.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	68	100.0%	4,289	100.0%	68	100.0%	4,289	100.0%

Consumer Loan Distribution Table

Exam: Metamora 2019

Assessment Area/Group :Metamora 2016								
	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	1	7.7%	30	2.9%
Moderate	0	0.0%	0	0.0%	2	15.4%	35	3.4%
Low/Moderate Total	0	0.0%	0	0.0%	3	23.1%	65	6.3%
Middle	4	30.8%	316	30.8%	0	0.0%	0	0.0%
Upper	9	69.2%	710	69.2%	7	53.8%	711	69.3%
Unknown	0	0.0%	0	0.0%	3	23.1%	250	24.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	1,026	100.0%	13	100.0%	1,026	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	2	33.3%	8	26.6%
Moderate	0	0.0%	0	0.0%	1	16.7%	3	8.7%
Low/Moderate Total	0	0.0%	0	0.0%	3	50.0%	10	35.2%
Middle	4	66.7%	19	66.0%	1	16.7%	3	11.9%
Upper	2	33.3%	10	34.0%	2	33.3%	15	52.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	29	100.0%	6	100.0%	29	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Residential Loans							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	3	15.8%	38	3.6%
Moderate	0	0.0%	0	0.0%	3	15.8%	38	3.6%
Low/Moderate Total	0	0.0%	0	0.0%	6	31.6%	75	7.1%
Middle	8	42.1%	335	31.8%	1	5.3%	3	0.3%
Upper	11	57.9%	720	68.2%	9	47.4%	726	68.8%
Unknown	0	0.0%	0	0.0%	3	15.8%	250	23.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	1,055	100.0%	19	100.0%	1,055	100.0%

Consumer Loan Distribution Table

Exam: Metamora 2019

Assessment Area/Group -Metamora 2015								
	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Equity								
Low	0	0.0%	0	0.0%	1	6.3%	20	2.6%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	6.3%	20	2.6%
Middle	6	37.5%	320	41.3%	3	18.8%	95	12.3%
Upper	10	62.5%	455	58.7%	6	37.5%	405	52.3%
Unknown	0	0.0%	0	0.0%	6	37.5%	255	32.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	775	100.0%	16	100.0%	775	100.0%
Other - Secured								
Low	0	0.0%	0	0.0%	2	22.2%	13	25.3%
Moderate	0	0.0%	0	0.0%	4	44.4%	19	35.4%
Low/Moderate Total	0	0.0%	0	0.0%	6	66.7%	32	60.7%
Middle	7	77.8%	47	89.4%	2	22.2%	11	20.2%
Upper	2	22.2%	6	10.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	11.1%	10	19.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	52	100.0%	9	100.0%	52	100.0%
Other - Unsecured								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	1	100.0%	15	100.0%
Upper	1	100.0%	15	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	15	100.0%	1	100.0%	15	100.0%
Residential Loans								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Consumer Loan Totals:								
Low	0	0.0%	0	0.0%	3	11.5%	33	3.9%
Moderate	0	0.0%	0	0.0%	4	15.4%	19	2.2%
Low/Moderate Total	0	0.0%	0	0.0%	7	26.9%	52	6.1%
Middle	13	50.0%	367	43.5%	6	23.1%	121	14.3%
Upper	13	50.0%	476	56.5%	6	23.1%	405	48.1%
Unknown	0	0.0%	0	0.0%	7	26.9%	265	31.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	842	100.0%	26	100.0%	842	100.0%

Consumer Loan Distribution Table

Exam: Metamora 2019

Assessment Area/Group -Metamora 2014								
	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Equity								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	100.0%	145	100.0%	1	33.3%	25	17.2%
Upper	0	0.0%	0	0.0%	2	66.7%	120	82.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	145	100.0%	3	100.0%	145	100.0%
Other - Secured								
Low	0	0.0%	0	0.0%	1	33.3%	10	44.3%
Moderate	0	0.0%	0	0.0%	1	33.3%	7	31.3%
Low/Moderate Total	0	0.0%	0	0.0%	2	66.7%	16	75.6%
Middle	1	33.3%	5	24.4%	1	33.3%	5	24.4%
Upper	2	66.7%	16	75.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	22	100.0%	3	100.0%	22	100.0%
Other - Unsecured								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Residential Loans								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Consumer Loan Totals								
Low	0	0.0%	0	0.0%	1	16.7%	10	5.7%
Moderate	0	0.0%	0	0.0%	1	16.7%	7	4.1%
Low/Moderate Total	0	0.0%	0	0.0%	2	33.3%	16	9.8%
Middle	4	66.7%	150	90.2%	2	33.3%	30	18.2%
Upper	2	33.3%	16	9.8%	2	33.3%	120	72.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	167	100.0%	6	100.0%	167	100.0%

APPENDIX C

GLOSSARY OF TERMS

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

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

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

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

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

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

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

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

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

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

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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