

PUBLIC DISCLOSURE

November 28, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Cortland Savings and Banking Company
RSSD # 846619

194 West Main Street
Cortland, Ohio 44410

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 Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

The major factors and criteria contribution to this rating include:

- A reasonable loan-to-deposit ratio given the institution's size, financial condition, and assessment area credit needs;
- A majority of loans and other lending-related activities are inside the assessment area;
- A reasonable geographic distribution of loans throughout the assessment area;
- A reasonable penetration of loans among borrowers of different income levels and penetration of loans among businesses of different revenue sizes;
- No CRA-related complaints about the institution's performance in meeting the assessment area credit needs; and,
- An excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services, considering the bank's capacity and the need and availability of such opportunities in the bank's assessment area.

The previous CRA examination conducted November 4, 2013 resulted in a "Satisfactory" performance rating.

SCOPE OF EXAMINATION

The Cortland Savings and Banking Company's (Cortland) Community Reinvestment Act (CRA) performance was evaluated using the interagency intermediate bank examination procedures under Regulation BB.

Cortland's CRA performance was evaluated based on lending data for the period of January 1, 2015 to December 31, 2015. The products evaluated included Home Mortgage Disclosure Act (HMDA)-reportable loans small business, and consumer loans. HMDA-reportable loans are comprised of home purchase, refinance, and home improvement loans. Consumer loans are comprised of home equity loan products.

Community development activities for the period between November 4, 2013 and November 28, 2016 were also reviewed as part of this evaluation, specifically community development loans, investments, and services occurring since the previous examination.

Cortland's CRA-delineated footprint comprises the following three assessment areas:

- Youngstown-Warren-Boardman OH-PA Metropolitan Statistical Area (Youngstown MSA)
- Akron OH Metropolitan Statistical Area (Akron MSA)
- Nonmetropolitan Ohio

All three assessment areas were evaluated for lending and community development performance tests. Based on the volume of lending activity, number of branches, and deposit market share, the Youngstown MSA was reviewed using full-scope examination procedures, whereas limited-scope reviews were completed for the Akron MSA and Nonmetropolitan Ohio.

This evaluation of Cortland's lending record includes the utilization of and comparison to demographic characteristics. The primary sources for demographic data are the 2010 U.S. Census and 2015 Dun & Bradstreet data. Demographic characteristics of a particular assessment area are useful in analyzing a financial institution's lending record, as they provide a means of estimating loan demand and identifying lending opportunities.

Loans are evaluated to determine the lending activity inside and outside Cortland's assessment areas. In addition, loans inside the assessment area are evaluated based on the geographic and borrower income distribution for each assessment area. The geographic distribution of HMDA and home equity loans are assessed by comparing the percentage of loans made in each geography type (low-, moderate-, middle-, and upper-income) to the percentage of owner-occupied units in each geography type. Small business loans are compared to the percentage of small businesses within each geographic income category.

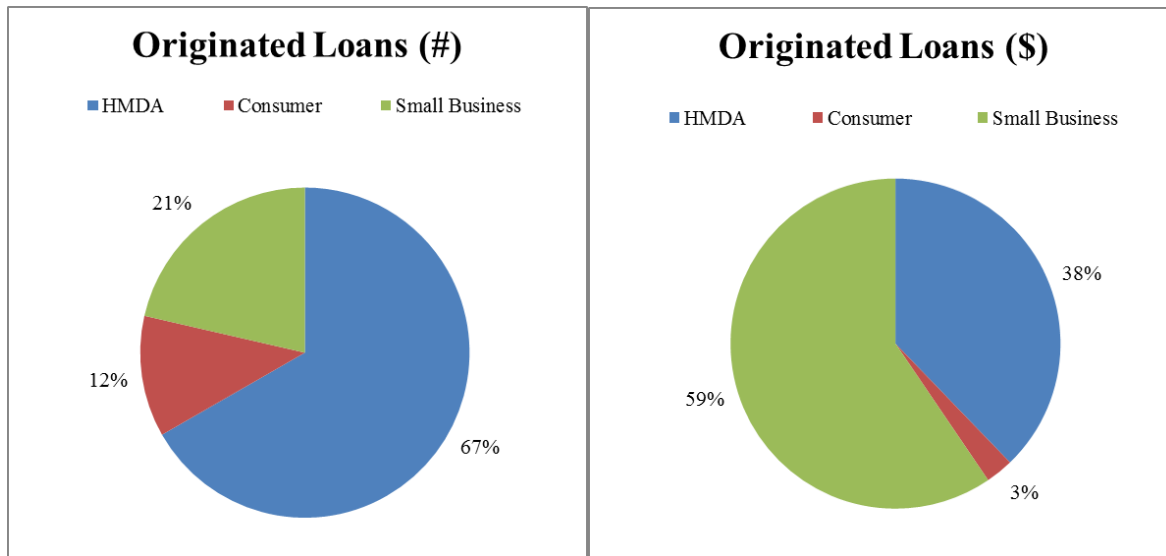
The distribution of HMDA and home equity loans by borrower income is assessed by comparing the percentage of loans made to borrowers in each income category (low-, moderate-, middle-, and upper-income) to the percentage of families in each income category. The distribution of small business loans by borrower income is assessed by comparing the percentage of loans made to businesses in each revenue category (less than or equal to \$1 million and greater than \$1 million) to the percentage of total businesses in each revenue category.

Cortland’s lending performance was also compared to the performance of aggregate lenders in 2015, Aggregate lenders include all lenders required to report HMDA-reportable loans within the respective assessment areas.

A community contact interview was conducted to provide perspective on the credit needs of the area in which Cortland operates. Details from this interview are presented within the full-scope assessment area of this evaluation.

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

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
HMDA	433	\$65,764
Small Business	139	\$103,541
Consumer	77	\$4,720
Total	649	\$174,025



Based on the total loan volume by number and dollar amount and composition of the loan portfolio, overall HMDA lending received the most weight, followed by small business and consumer lending. Among HMDA lending, home purchase lending received the most weight followed by refinance and home improvement lending.

For the purpose of this evaluation, geographic distribution and borrower distribution were weighted equally based on the characteristics of the assessment area. For example, low- and moderate-income tracts comprise 35.4% of Cortland's geographies and low- and moderate-income families make up 38.6% of Cortland's borrowers.

DESCRIPTION OF INSTITUTION

Cortland is the banking subsidiary of Cortland Bancorp and is headquartered in Cortland, Ohio. As of June 30, 2016, Cortland reported \$602.6 million in total assets, an increase of 11.6% since the previous CRA evaluation.

Cortland operates a main office located in Cortland, Ohio in Trumbull County in addition to 12 branch offices, 12 full-service ATMs, and one cash-only dispensing ATM throughout the assessment area. Cortland has six other offices in Trumbull County, three offices in Mahoning County, one office in Ashtabula County, and two in Portage County. Cortland has no branch offices or ATMs located in low-income census tracts, but one office in the Akron MSA is located in a moderate-income tract. Of the remaining offices, nine are located in middle-income tracts and three are located in upper-income tracts. Cortland is a full-service retail bank offering deposit accounts and residential mortgage, consumer, and commercial loans. Since the previous evaluation, Cortland opened loan production offices in Beachwood, Ohio (Cuyahoga County) and Fairlawn, Ohio (Summit County).

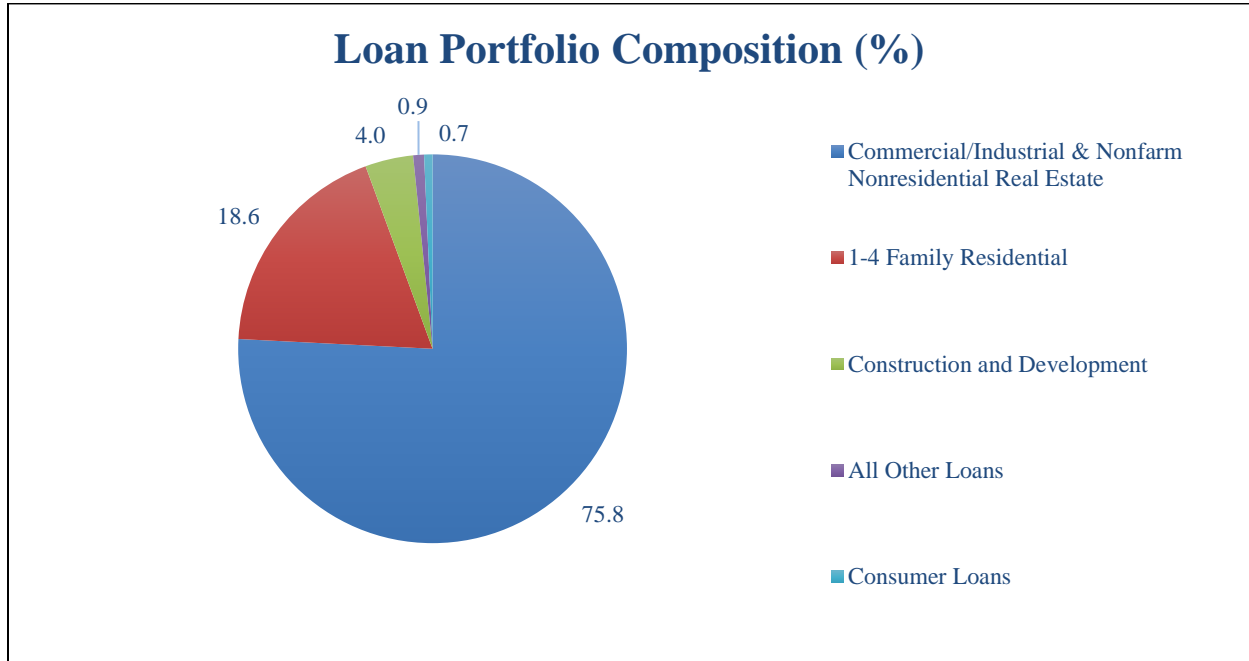
Cortland also opened a retail branch in Canfield, Ohio (Mahoning County) in September 2015. Also, Cortland is expanding its operations in Summit County by opening a branch in Hudson, Ohio in December 2016. The loan production office in Fairlawn will be absorbed by this branch.

As of June 30, 2016 net loans and leases represent \$384.7 million, which is 63.8% of total assets.

The following table and charts illustrate the volume and distribution of loans originated within Cortland's assessment area during the evaluation period.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2016		12/31/2015		12/31/2014	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	15,614	4.0%	13,917	3.5%	14,638	4.1%
Secured by One- to Four- Family	72,235	18.6%	66,186	16.7%	58,763	16.4%
Other Real Estate: Farmland	298	0.1%	350	0.1%	350	0.1%
Other Real Estate: Multifamily	3,048	0.8%	3,163	0.8%	3,387	0.9%
Other Real Estate: Nonfarm nonresidential	230,628	59.4%	226,302	57.0%	207,233	57.7%
Commercial and Industrial	63,809	16.4%	83,575	21.0%	70,603	19.7%
Loans to Individuals	2,869	0.7%	3,676	0.9%	4,008	1.1%
Agricultural Loans	0	0.0%	0	0.0%	0	0.0%
Total	\$388,501	100.00%	\$397,169	100.00%	\$358,982	100.00%

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



Cortland’s investment portfolio as of June 30, 2016 was \$173.4 million, which represents 28.8% of total assets. Investments in U.S. Treasuries and Agencies account for 57.4% and municipal securities account for 35.1% of total investments.

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

DESCRIPTION OF ASSESSMENT AREAS

Cortland has delineated three assessment areas within Ohio, including:

- Youngstown-Warren-Boardman OH-PA MSA 49660, comprising the entireties of Trumbull and Mahoning counties in Ohio, but excluding Mercer County in Pennsylvania.
- Akron OH MSA 10420, comprising the entireties of Portage and Summit counties.
- Nonmetropolitan Ohio, comprising two census tracts in southernmost Ashtabula County, which borders Trumbull County.

Cortland's assessment areas consist of 297 census tracts, of which 40 (13.5%) are designated as low-income, 65 (21.9%) are moderate-income, 129 (43.4%) are middle-income, and 63 (21.2%) are upper-income tracts. There are no underserved or distressed middle-income tracts within Cortland's delineated assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Cortland’s lending test performance is rated “Satisfactory.” Lending performance in the Youngstown MSA was considered reasonable. Lending in the Akron MSA and Nonmetropolitan Ohio was consistent with Cortland’s overall lending performance.

Loan-to-Deposit Ratio

A financial institution’s loan-to-deposit (LTD) ratio compares the institution’s aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of the institution’s lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing by the total number of quarters. The following table illustrates Cortland’s quarterly LTD ratios for 13 quarters since the previous evaluation compared to Cortland’s custom peer group. The custom peer consists of two similarly situated community banks within Cortland’s assessment area.

Cortland Loan-to-Deposit Ratios				
AS OF DATE	CORTLAND SVG & BKG CO	ANDOVER BK	MIDDLEFIELD BKG CO	CUSTOM PEER
September 30, 2016	77.60	58.36	90.22	74.29
June 30, 2016	78.65	58.55	90.77	74.66
March 31, 2016	77.24	57.23	82.78	70.01
December 31, 2015	79.17	57.13	84.39	70.76
September 30, 2015	78.67	55.25	80.37	67.81
June 30, 2015	79.22	54.85	77.99	66.42
March 31, 2015	77.32	52.65	76.05	64.35
December 31, 2014	77.84	53.31	79.07	66.19
September 30, 2014	76.00	51.67	76.64	64.16
June 30, 2014	73.51	51.00	75.10	63.05
March 31, 2014	73.94	50.52	73.30	61.91
December 31, 2013	76.57	50.44	73.09	61.77
September 30, 2013	74.09	50.65	68.47	59.56
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation	76.91	53.97	79.10	66.53

Cortland’s average LTD ratio was 76.91% over the past 13 quarters of operation, which exceeds the customer peer group average of 66.53%, specifically, Andover Bank’s LTD ratio is significantly lower and Middlefield Banking Company’s LTD ratio is slightly higher than Cortland’s. Overall, Cortland’s LTD has remained relatively stable during this time period. Bank management attributes its performance to low interest rates and steady loan generation across all product types. Considering Cortland’s lending-related activity, size, financial condition, and assessment area credit needs, Cortland’s LTD ratio is considered reasonable.

Lending in the Assessment Area

Cortland’s mortgage, small business, and consumer lending was analyzed to determine the volume of lending inside and outside Cortland’s assessment area. Of Cortland’s total loans, 82.4% by volume and 77.4% by dollar amount were made inside the assessment area.

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

Lending Inside and Outside the Assessment Area

Exam: Cortland Revised

Loan Type - Description	Inside				Outside				Total	
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	\$(000s)
HE - Home Equity	71	92.2	4,241	89.9	6	7.8	479	10.1	77	4,720
Total Consumer related	71	92.2	4,241	89.9	6	7.8	479	10.1	77	4,720
CV - Home Purchase - Conventional	196	82.4	32,142	75.8	42	17.6	10,255	24.2	238	42,397
FH - Home Purchase - FHA	34	85.0	3,307	82.7	6	15.0	692	17.3	40	3,999
HI - Home Improvement	54	96.4	2,151	96.8	2	3.6	70	3.2	56	2,221
RF - Refinancing	75	78.9	12,012	73.7	20	21.1	4,284	26.3	95	16,296
VH - Home Purchase - VA	3	75.0	542	63.7	1	25.0	309	36.3	4	851
Total HMDA related	362	83.6	50,154	76.3	71	16.4	15,610	23.7	433	65,764
SB - Small Business	102	73.4	80,229	77.5	37	26.6	23,312	22.5	139	103,541
Total Small Bus. related	102	73.4	80,229	77.5	37	26.6	23,312	22.5	139	103,541
TOTAL LOANS	535	82.4	134,624	77.4	114	17.6	39,401	22.6	649	174,025

Therefore, a majority of Cortland’s loans by both volume and dollar amount were made inside its assessment area.

Geographic Distribution of Lending

Cortland's geographic distribution of lending is reasonable. While significant lending gaps exist in in Cortland's primary assessment area, the dispersion of loans among different tract income categories is adequate. HMDA lending, which received the most weight, is considered adequate. Small business and consumer lending are also considered adequate. The respective analyses are included within the full-scope assessment area evaluation discussed later in this report.

Borrower Distribution of Lending

Cortland's lending to borrowers of different income levels and businesses of different revenue sizes are reasonable. HMDA lending, which received the greatest weight, is good, whereas small business and consumer lending are considered adequate. The respective analyses can be found within the full-scope assessment area evaluation discussed later in this report.

Response to Consumer Complaints

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

Community Development Test

Cortland made an outstanding level of community development activities during this evaluation period, considering the size and presence of the institution in its assessment areas and community development opportunities. Cortland also made two qualified community development activities outside of its delineated assessment areas ,which are discussed below.

Community Development Loans

Cortland originated three qualified community development loans totaling \$821,201 within the Youngstown MSA during this evaluation period.

In addition, Cortland originated two qualified community development loans totaling \$6.1 million outside its delineated assessment areas during this review period that supported the rehabilitation of a historic building located in Chillicothe, Ohio (Ross County). This building was the first development project to utilize funding from the new JobsOhio revitalization program and created 13 new jobs and retained nine existing jobs. Cortland was the leverage lender and provided a \$4.1 million senior mortgage and \$2.0 million bridge loan.

Community Development Investments

Investments were in the form of Low-Income Housing Tax Credits (LIHTCs) and small dollar donations. Cortland made nine qualified small dollar donations totaling \$11,596 during this review period. Eight donations totaling \$11,346 were made in the Youngstown MSA and one donation totaling \$250 was made in Nonmetropolitan Ohio. These small-dollar donations primarily helped to support non-profit organizations providing services to low- and moderate-income individuals and families.

Cortland invested \$2.0 million during this evaluation period in a qualified Community Development Financial Institutions (CDFI) Fund certified for community development. The fund helps provide lower-cost capital to businesses meeting the SBA 7(a) Program eligibility standards and promote permanent job creation, retention, and/or improvement in low- or moderate-income areas or for low- and moderate-income persons employed by small businesses. During this evaluation period, \$1.9 million helped retain several businesses in the Youngstown MSA and \$144,000 helped retain a business located in a moderate-income tract in Ashtabula County adjacent to Cortland's delineated assessment area in Nonmetropolitan Ohio.

During this review period, Cortland invested \$3.0 million in the Ohio Capital Corporation for Housing (OCCH) fund. OCCH's core activity is raising private capital for investment in affordable housing developments utilizing the LIHTC program. This investment helped various counties throughout Ohio and benefited affordable housing developments within Cortland's delineated CRA footprint (Ashtabula, Portage, Summit, and Trumbull counties).

Community Development Services

Cortland employees were involved with organizations and activities that promote financial literacy education to low- and moderate-income students and small business owners/entrepreneurs. Cortland's officers provide their financial expertise to the community by engaging in activities promoting or facilitating services for low- and moderate-income individuals and families and economic development in the Youngstown MSA.

Fair Lending or Other Illegal Credit Practices Review

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

**DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE
YOUNGSTOWN-WARREN-BOARDMAN OH-PA MSA 49660
(Full-scope Review)**

The Youngstown MSA consists of Mahoning and Trumbull counties in Ohio and Mercer County in Pennsylvania. Cortland’s assessment area consists of the entireties of Trumbull and Mahoning counties in Ohio, but excludes Mercer County in Pennsylvania. This assessment area consists of a total of 125 census tracts comprising 16 low-income (12.8%), 27 moderate-income (21.6%), 62 middle-income (49.6%), and 20 upper-income tracts (16.0%). Cortland has seven offices, including the main office, in Trumbull County and three offices in Mahoning County.

Trumbull County is located in northeastern Ohio and is a mixture of urban and rural areas situated between the Youngstown, Cleveland, and Akron corridors. Warren is the largest city and county seat.

Mahoning County is located south of Trumbull County. Youngstown is the largest city and county seat and is located approximately 65 miles southeast of Cleveland and 61 miles northwest of Pittsburgh, Pennsylvania.

According to the June 30, 2016 FDIC Deposit Market Share Report, Cortland ranked seventh out of 14 institutions in the market with \$437.6 million in deposits, representing a market share of 6.1% in the Youngstown MSA.¹

#	Financial Institution	Deposit Market Share
1	The Huntington National Bank	25.54%
2	JPMorgan Chase Bank, NA	12.22%
3	The Home Savings and Loan Company of Youngstown, Ohio	12.01%
4	Talmer Bank and Trust	11.81%
5	PNC Bank, NA	10.83%
6	The Farmers National Bank of Canfield	10.53%
7	The Cortland Savings and Banking Company	6.10%
8	First National Bank of Pennsylvania	5.27%
9	Key Bank, NA	1.88%
10	Citizens Bank, NA	1.84%

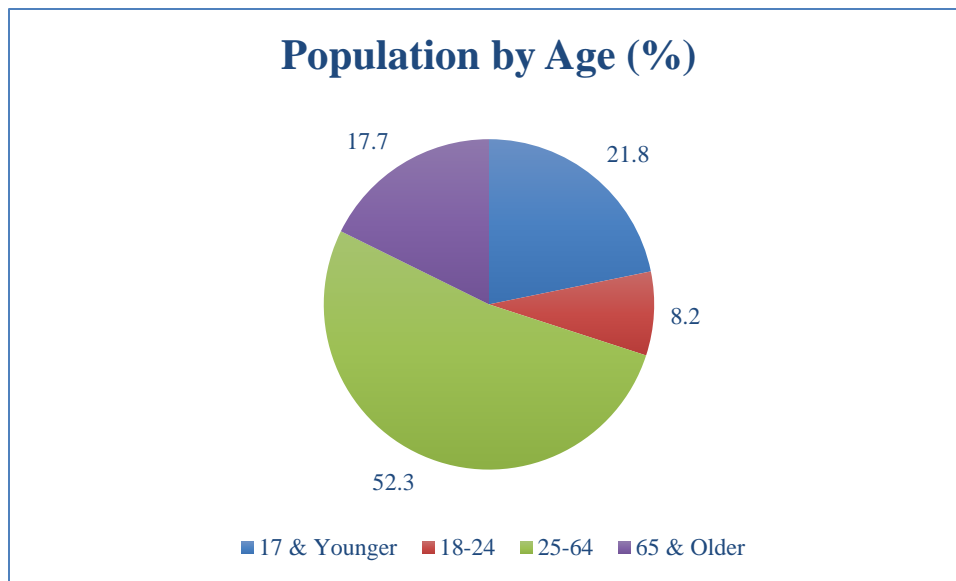
One community contact interview was conducted to provide additional information regarding credit needs of the local community and context to the demographic and economic characteristics discussed. The community contact, representing a neighborhood revitalization organization that helps to address the lack of access to food and promote homeownership in the Trumbull County area, stated the economic conditions in the city of Warren and Trumbull County are well below the state average, primarily due to the significant loss of jobs in the steel and auto industries. The contact stated there is a significant need for home loan financing in the area and mentioned several area banks help support the organization’s mission.

¹ <http://www2.fdic.gov/sod/sodMarketBank.asp>

The contact indicated that Warren continues to have significant pockets of low-income residents in neighborhoods in need of revitalization and affordable housing. Lastly, the contact stated that while the organization has renovated numerous homes in Trumbull County, it has experienced difficulty placing families in these homes due to the lack of available financing for lower-income borrowers.

Population Characteristics

According to the 2010 U.S. Census, the total population in this assessment area is 449,135. Approximately, 7.9% of the assessment area’s population resides in low-income tracts and 16.1% in moderate-income tracts, while 53.4% reside in middle-income tracts and 22.6% reside in upper-income tracts. As shown in the chart below, 78.2% of the population is 18 years of age or older, which is the legal age to enter into a contract. However, the number of persons 65 years and older accounts for 17.7% of the assessment area’s total population, which is 3.6% more than Ohio’s senior population at 14.1%.



The following table shows the actual and projected population changes since the 2010 U.S. Census by county in this assessment area.²

County	2010 Population	2015 Population	Population Percent Change
Mahoning	238,823	231,900	-2.9%
Trumbull	210,312	203,751	-3.1%
Total	449,135	435,651	

The declining population and higher percentage of the population that is 65 years and older could limit Cortland’s ability to make loans in this assessment area.

² http://www.development.ohio.gov/reports/reports_countytrends_map.htm

Income Characteristics

According to data from the U.S. Department of Housing and Urban Development (HUD), the 2010 median family income for the assessment area was \$52,363. The 2015 estimated median family income are detailed in the following table.³

Borrower Income Levels
Youngstown, Ohio - MSA

HUD Estimated		Low			Moderate			Middle			Upper		
Median Family Income		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2015	\$53,700	0	-	\$26,849	\$26,850	-	\$42,959	\$42,960	-	\$64,439	\$64,440	-	& above

The MSA's median family income increased slightly in 2015.

The assessment area contains 185,487 households, of which 119,938 (64.7%) are designated as families. Low- and moderate-income families represent 20.7% and 17.8% of all families in this assessment area, respectively, with 12.1% of families below the poverty level as compared to 10.3% of all families below the poverty level within Ohio.

Based on 2014 data from the Economic Research Service of the U.S. Department of Agriculture (USDA), household poverty rates for the counties in the assessment area were as follows:

County	2013 Poverty Rate	2014 Poverty Rate	Change
Mahoning	18.00%	18.90%	5.00%
Trumbull	18.70%	17.20%	-8.02%
Ohio	15.90%	15.80%	-0.63%
United States	15.80%	15.50%	-1.90%

During this time period, the poverty rate for Mahoning County increased, while the poverty rate for Trumbull County decreased at a higher rate than Ohio and the nation. Regardless, the Youngstown MSA's rate of poverty is significantly higher than the state and the nation.

Labor, Employment and Economic Characteristics

The following table illustrates the largest percentage of land use in each county in the assessment area:⁴

County	Urban	Cropland	Pasture	Forest	Open Water	Bare Mines	Wetlands
Mahoning	29.64%	16.71%	15.02%	30.06%	2.66%	0.42%	2.17%
Trumbull	19.76%	21.66%	9.66%	32.54%	3.26%	0.09%	7.93%

³ <http://www.huduser.org/portal/datasets/il/il13/index.html>

Only 29.6% of the land in Mahoning County and 19.8% of the land in Trumbull County is considered urban, which includes land used for residential, commercial, industrial, or transportation purposes or as urban grasses. The remaining amount of land that does not contain housing, businesses, or schools may impact Cortland’s ability to originate all types of loans in this assessment area.

According to the Ohio Office of Policy, Research, and Strategic Planning, the largest industries by average employment are trade, transportation and utilities; education and health services; and manufacturing. The following table identifies the employment sectors and major employers in Cortland’s assessment area, but is not limited to the following:⁴

County	Primary Employment Sectors	Major Employers
Mahoning	Trade, Transportation, and Utilities; Education and Health Services; Professional and Business Services; Leisure and Hospitality; Local Government; Manufacturing	Austintown Local Schools; Boardman Local Schools; HM Health Partners; InfoCision Management; Mahoning County Government; Schwebel Baking Company; UCFC/Home Savings & Loan Co; Vallourec Star/V&M Star; Valley Care Health System; VXi Global Solutions; Wal-Mart Stores Inc; Youngstown City Schools; Youngstown State University
Trumbull	Trade, Transportation, and Utilities; Manufacturing; Education and Health Services; Local Government; Leisure and Hospitality	Delphi Automotive Systems, LLC; General Motors Corp; HM Health Services; Sears Holdings/Kmart Corp; Trumbull County Government; Valley Care Health System; Warren City Schools; Wal-Mart Stores Inc

The following table shows the 2014 and 2015 average annual unemployment rate for Mahoning and Trumbull Counties, Ohio, and the nation.

Unemployment Rates
Cortland Bank: Youngstown-Warren-Boardman, OH-PA - MSA

Area	Years - Annualized	
	2014	2015
Mahoning Co.	5.7	7.4
Trumbull Co.	6.2	7.8
Youngstown-Warren-Boardman, OH-PA MSA	5.7	6.9
Ohio	4.9	4.6
National	5.4	4.8

Not Seasonally Adjusted, Data Extracted on November 12, 2016

The unemployment rates for Mahoning and Trumbull Counties were substantially higher than Ohio’s rate and the nation’s unemployment rate in 2014 and 2015. Also, unemployment rates increased in the MSA from 2014 to 2015; however, Ohio’s and the nation’s unemployment rates declined during this time period.

⁴ http://www.development.ohio.gov/reports/reports_countytrends_map.htm

Housing Characteristics

There are 208,680 housing units in this assessment area, based on the 2010 U.S. Census. Within this assessment area, 65.2% of the units are owner-occupied, 23.7% are rental units, and 11.1% are vacant. Only 5.3% and 13.3% of all owner-occupied housing units are located in low- and moderate-income census tracts, respectively, suggesting limited opportunity for mortgage credit in low- and moderate-income geographies.

The median age of housing stock in the MSA is 52 years, according to the 2010 U.S. Census, with 30.9% of housing built prior to 1950. In low-income tracts, the median age of housing stock is 61 years and in moderate-income tracts, the median age of housing stock is 59 years. Older homes such as these are typically more likely to require repairs and rehabilitation, which could indicate a need for home improvement loans, particularly in low- and moderate-income tracts.

The median housing value in the assessment area was \$100,106 with an affordability ratio of 41.1%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Further, based on the 2015 median family income for the Youngstown MSA (\$53,700), approximately 48.8% of the homes valued up to \$98,421 in the assessment area would be considered affordable for low-income individuals and 75.5% of the homes valued up to \$157,473 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed-rate, 30-year loan.

According to Sperling's Best Places, the 2015 median home cost in Trumbull County was \$80,100, a depreciation of 16.6% over the prior year, while in Mahoning County, the median home cost was \$73,700, a decline of 12.0% over the prior year.⁵

One in every 887 (0.1%) properties in Trumbull County and one in every 759 (0.1%) properties in Mahoning County was in foreclosure in October 2016. These were higher than Ohio's ratio of one in every 928 properties.⁶

The median gross rent in the assessment area was \$584, with only 11.8% of the rental units having rents of less than \$350 a month, according to the 2010 U.S. Census. The majority of rents (34.3%) in this assessment area were \$500-\$699 per month and 18.5% of rents were \$350-\$499, while 28.1% of rents were greater than \$700. Almost one-quarter of all housing units in the assessment area are rental units. Additionally, 46.5% of renters have rent costs greater than 30.0% of their income. According to the U.S. Census, median gross rent increased to \$638 in 2016. Increasing rental rates make it more difficult for potential homebuyers to save enough for a down payment.

The following table illustrates the demographics in the Youngstown MSA.

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

⁶ www.realtytrac.net

Combined Demographics Report

Assessment Area(s): Youngstown-Warren-Boardman, OH-PA MSA 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	12.8	7,967	6.6	3,539	44.4	24,767	20.6
Moderate-income	27	21.6	17,729	14.8	4,214	23.8	21,402	17.8
Middle-income	62	49.6	65,090	54.3	5,548	8.5	26,417	22
Upper-income	20	16	29,152	24.3	1,231	4.2	47,352	39.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	125	100.0	119,938	100.0	14,532	12.1	119,938	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	19,800	7,251	5.3	36.6	7,438	37.6	5,111	25.8
Moderate-income	36,236	18,117	13.3	50	11,792	32.5	6,327	17.5
Middle-income	108,532	75,578	55.5	69.6	23,435	21.6	9,519	8.8
Upper-income	44,112	35,136	25.8	79.7	6,740	15.3	2,236	5.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	208,680	136,082	100.0	65.2	49,405	23.7	23,193	11.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	1,382	7.2	1,189	6.8	176	11.8	17	13.9
Moderate-income	2,262	11.8	2,008	11.4	243	16.3	11	9
Middle-income	9,214	48.1	8,533	48.6	612	41	69	56.6
Upper-income	6,311	32.9	5,823	33.2	463	31	25	20.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	19,169	100.0	17,553	100.0	1,494	100.0	122	100.0
Percentage of Total Businesses:				91.6		7.8		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	4	0.8	4	0.8	0	0	0	0
Moderate-income	12	2.4	12	2.4	0	0	0	0
Middle-income	384	75.9	381	76	3	60	0	0
Upper-income	106	20.9	104	20.8	2	40	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	506	100.0	501	100.0	5	100.0	0	.0
Percentage of Total Farms:				99.0		1.0		.0

2015 FFIEC Census Data and 2015 D&B Information

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
YOUNGSTOWN-WARREN-BOARDMAN OH-PA MSA 49660**

Lending Test

Lending performance in the Youngstown MSA assessment area is considered to be reasonable. The greatest consideration, based on number and volume, was given to HMDA lending (home purchase, refinance, and home improvement), followed by small business lending and consumer lending (home equity loans). Details of Cortland’s HMDA, small business, and consumer lending can be found in the tables in Appendix B.

Geographic Distribution of Lending

Overall, Cortland’s distribution of lending among geographies is considered adequate. Home purchase lending, the largest loan category, is adequate, while refinance and home improvement lending is poor. Small business lending and home equity lending are adequate. There is also a moderate level of lending gaps, as noted in the following table:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration (% of tracts with one or more loans)
Low	16	11	31.3%
Moderate	27	14	48.1%
Middle	62	15	75.8%
Upper	20	0	100.0%
Total	125	40	68.0%

Lending gaps are considered moderate because Cortland was only able to penetrate 68.0% of the tracts within this assessment area. Penetration rates are substantially higher in middle- and upper-income tracts compared to low- and moderate-income tracts. However, the low penetration rate in low- and moderate-income tracts can be attributed to the relatively low owner-occupancy rate and the higher percentages of rentals and vacancies and families below the poverty level in these areas.

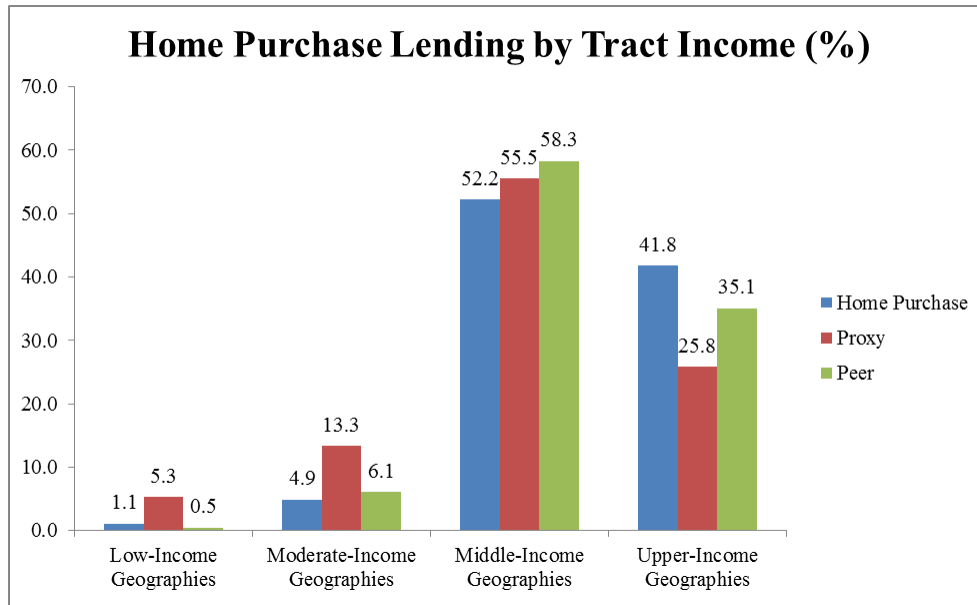
HMDA Lending

During this evaluation period, Cortland made 289 HMDA loans totaling \$37.4 million. The analysis of Cortland’s HMDA lending is discussed below.

Home Purchase

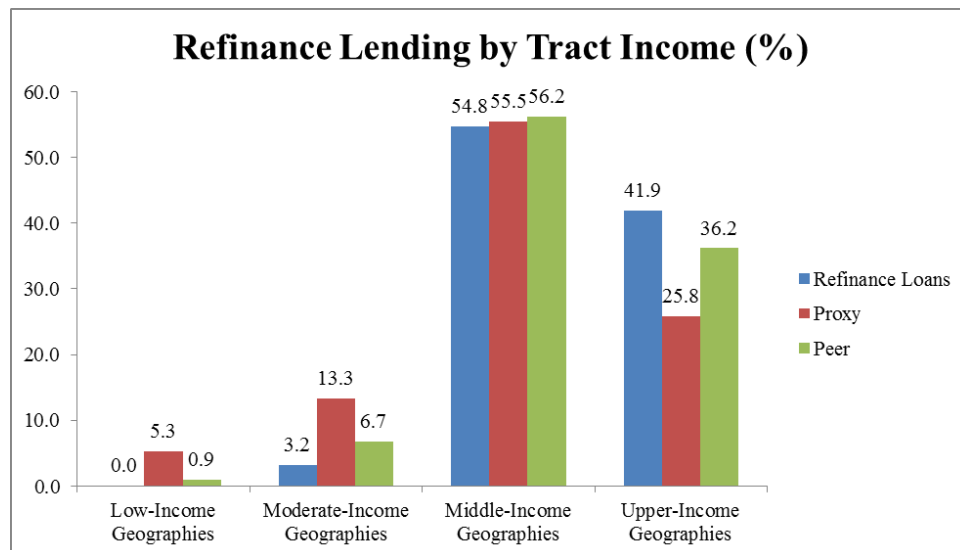
During this review period, Cortland made 184 home purchase loans totaling \$25.6 million. This represents 63.7% of Cortland’s total HMDA lending by volume and 68.7% by dollar. Cortland and the aggregate of all HMDA lenders (peer) performed similarly in the low- and moderate-income areas, but below the percentage of owner-occupied housing units in the assessment area (proxy). This may be attributed to a lack of affordable housing and high poverty rates in lower-income tracts.

Overall, Cortland’s home purchase lending was comparable to proxy and peer in middle-income tracts and exceeded proxy and peer in upper-income tracts. Therefore, Cortland’s geographic distribution of home purchase loans is considered adequate.



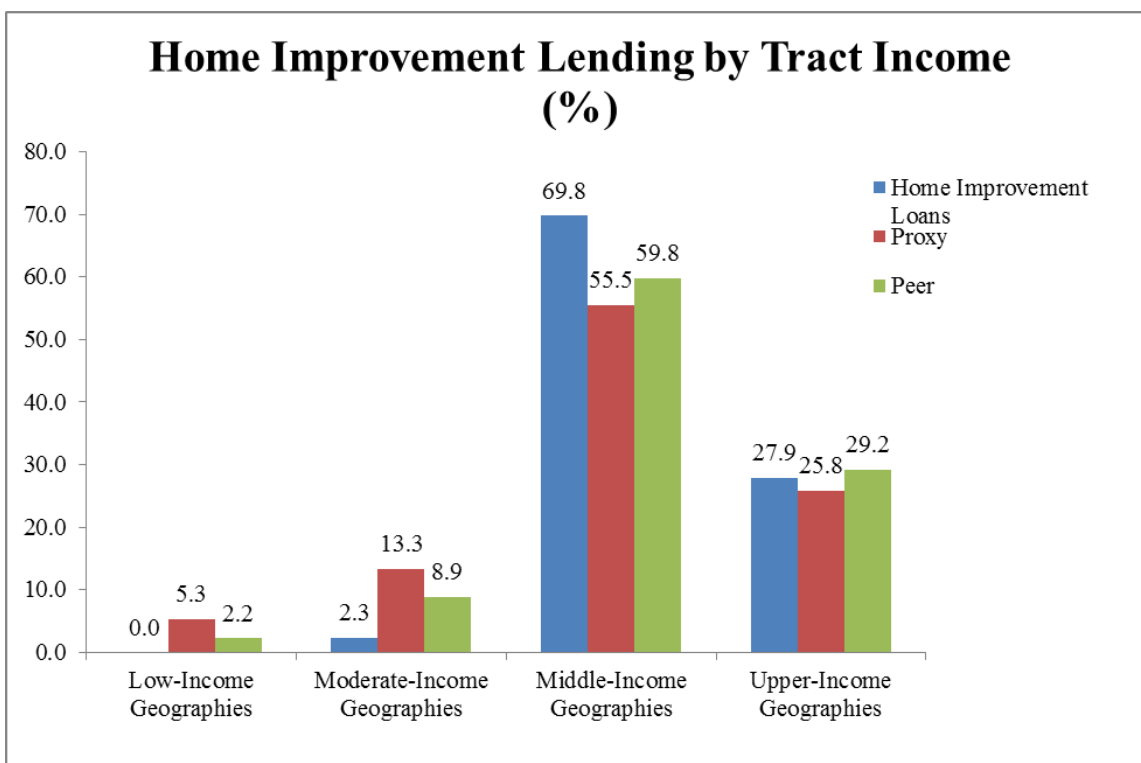
Refinance

During this review period, Cortland made 62 refinance loans totaling \$10.0 million, which represents 21.5% of Cortland’s total HMDA lending by volume and 26.7% by dollar. While Cortland did not make any refinance loans in low-income tracts and only two refinance loans in moderate-income tracts, only 5.3% and 13.3% of all owner-occupied units are located in these areas, respectively. Cortland performed below proxy and peer in low- and moderate-income areas. Overall, Cortland’s refinance lending was comparable to proxy and peer in middle-income tracts and exceeded proxy and peer upper-income tracts. Therefore, Cortland’s geographic distribution of refinance loans is considered poor.



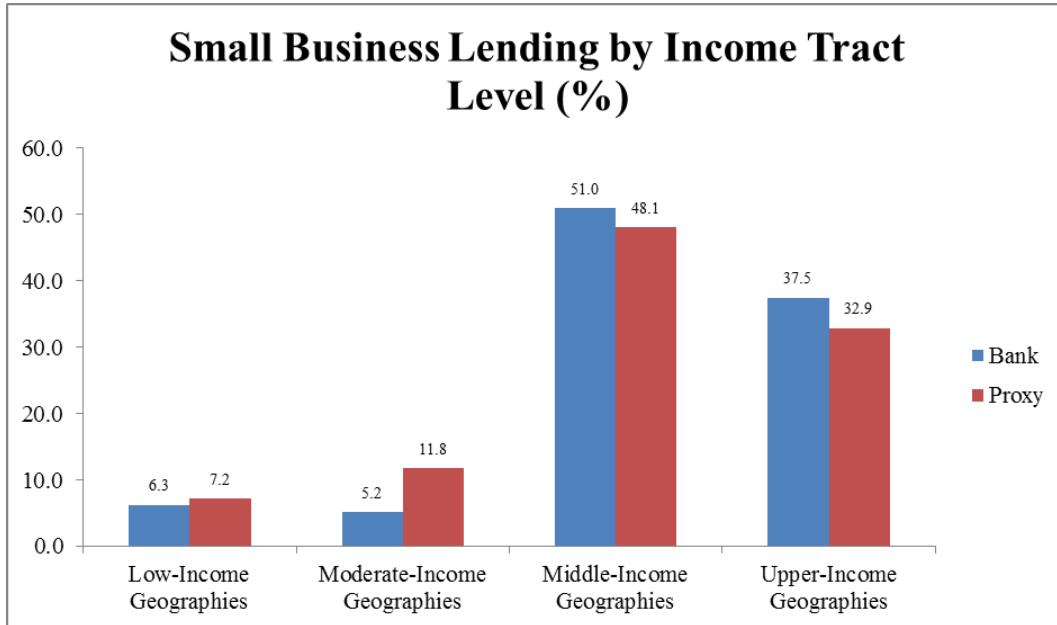
Home Improvement

During this review period, Cortland made 43 home improvement loans totaling \$1.8 million, which represents 14.9% of Cortland’s total HMDA lending by volume and 4.8% by dollar. Cortland did not make any home improvement loans in low-income tracts and only one home improvement loan in moderate-income tracts and Cortland performed below peer and proxy in these geographies. However, there is a need for home improvement loans based on the median age of housing stock at 61 years in low- and 59 years in moderate-income tracts, as typically, older homes are more likely to require repairs and rehabilitation. Overall, Cortland’s home improvement lending exceeded proxy and peer performance in middle- and upper-income tracts, respectively. Therefore, Cortland’s geographic distribution of home improvement loans is considered poor.



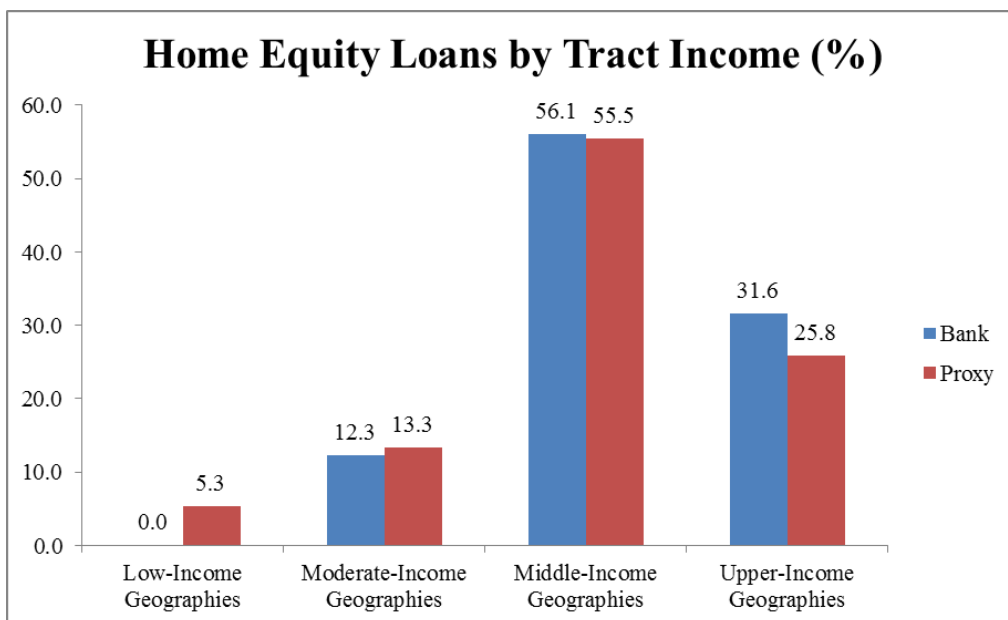
Small Business Lending

Cortland originated 96 small business loans totaling \$73.4 million in the assessment area during this review period. As shown in the following graph, Cortland performed similar to proxy (percent of total business in the assessment area with revenue of \$1 million or less) in low-income census tracts and significantly below proxy in moderate-income tracts; however, only 19.0% of businesses are located in low- and moderate-income geographies compared to 81.0% in middle- and upper-income geographies. Overall, Cortland’s small business lending exceeded proxy in middle- and upper-income tracts, respectively. Therefore, geographic distribution of small business loans is considered adequate.



Consumer Lending (Home Equity Loans)

Cortland originated 57 home equity loans totaling \$3.1 million within the assessment area during this review period. Cortland’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy). As shown in the graph below, Cortland made no home equity loans in low-income tracts. Cortland made seven (12.3%) home equity loans in moderate-income tracts, which was comparable to the proxy. Overall, Cortland’s home equity lending exceeded proxy performance in middle- and upper-income tracts. Therefore, Cortland’s geographic distribution of consumer home equity loans is considered adequate.



Borrower Distribution of Lending

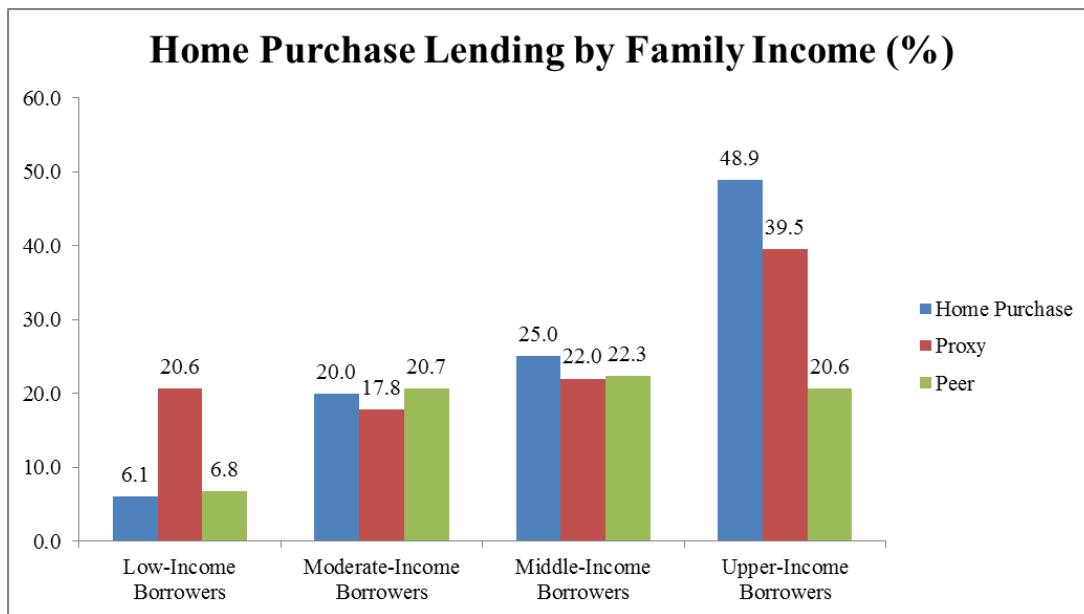
Overall, Cortland’s borrower distribution is considered good. Home purchase lending, the largest loan category is good, while refinance lending is adequate and home improvement lending is good. Small business lending and home equity lending are also adequate.

HMDA Lending

During this evaluation period, Cortland made 289 HMDA loans totaling \$37.4 million. The analysis of Cortland’s HMDA lending is discussed below.

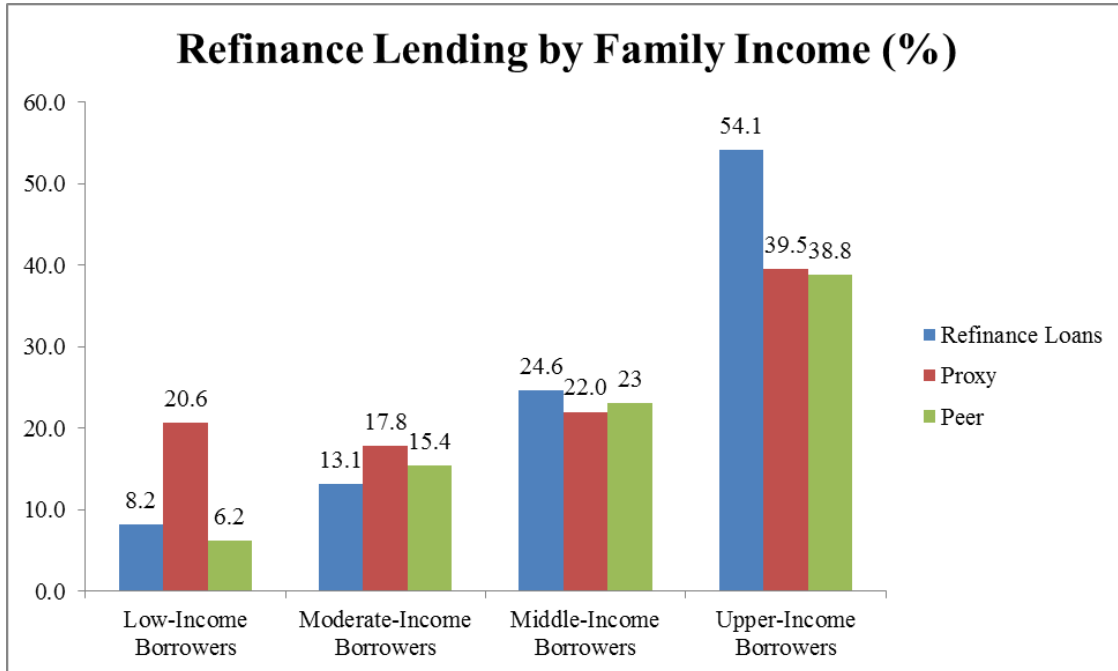
Home Purchase

During this review period, Cortland made 184 home purchase loans totaling \$25.6 million. As shown below, Cortland’s home purchase lending is significantly below the percentage of low-income families (proxy) but comparable to the aggregate of all HMDA lenders (peer). Home purchase lending exceeded the percentage of moderate-income families and was comparable to peer. Overall, Cortland’s home purchase lending exceeded proxy and peer to middle- and upper-income borrowers, respectively. Given the high poverty levels and the need to originate home purchase loans to lower-income borrowers expressed by the community contact, Cortland’s borrower distribution of home purchase loans is considered good.



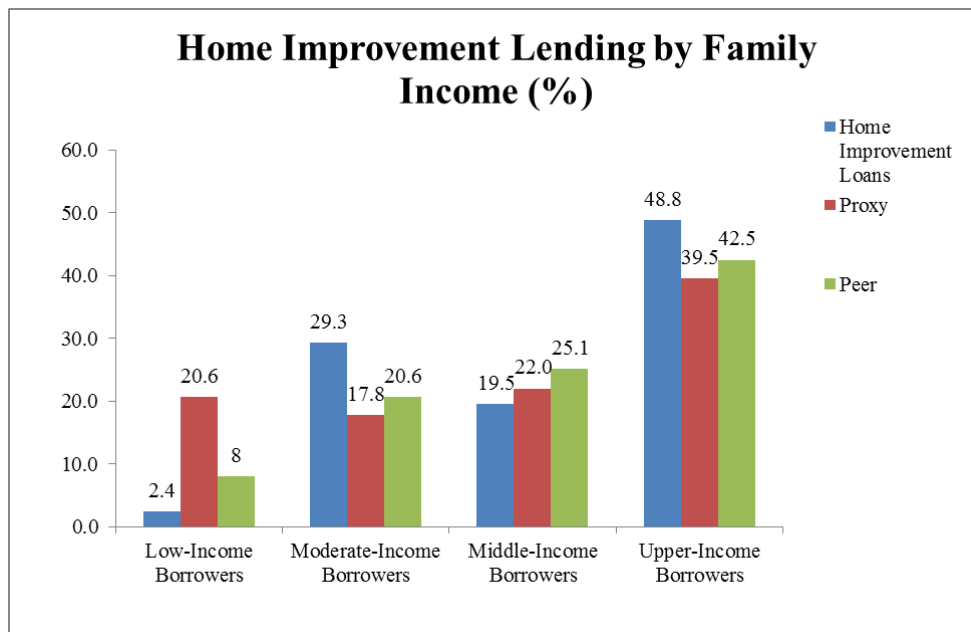
Refinance

During this review period, Cortland made 62 refinance loans totaling \$10.0 million. While Cortland’s refinance lending to low-income borrowers is significantly below proxy, it exceeds peer. Lending to moderate-income borrowers is below proxy and peer. Overall, Cortland’s performance exceeded proxy and peer to middle- and upper-income borrowers. Therefore, the borrower distribution of refinance loans is considered adequate.



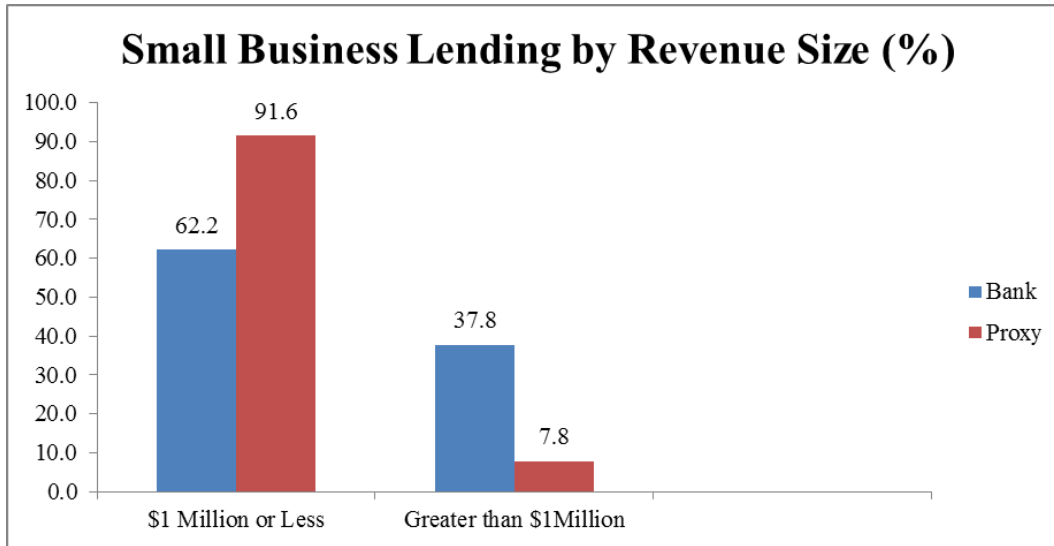
Home Improvement

During this review period, Cortland made 43 home improvement loans totaling \$1.8 million. Cortland made only one home improvement loan to low-income borrowers and 12 home improvement loans to moderate-income borrowers. Lending to low-income borrowers is significantly below peer and proxy, while lending to moderate-income borrowers is significantly above peer and proxy. Overall, Cortland's performance was below proxy and peer to middle-income borrowers and exceeded proxy and peer to upper-income borrowers. Therefore, the borrower distribution of home improvement loans is considered good.

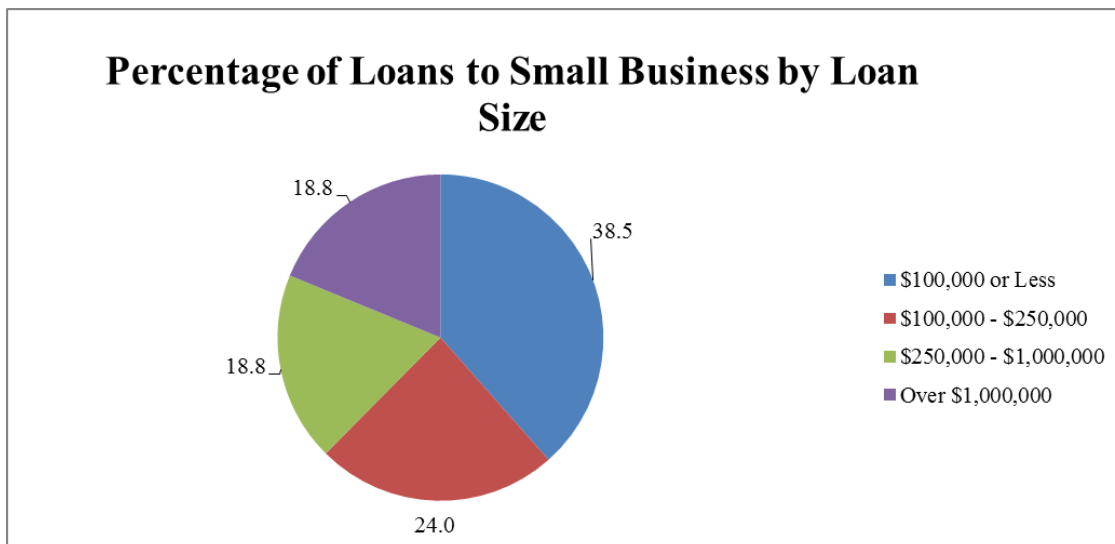


Small Business Lending

Cortland originated 96 small business loans totaling \$73.4 million in the assessment area during this review period. As shown below, Cortland’s was able to make 62.2% of small business loans to businesses with revenues of \$1 million or less. Cortland’s performance was below the percentage of small businesses in the assessment area at 91.6%.

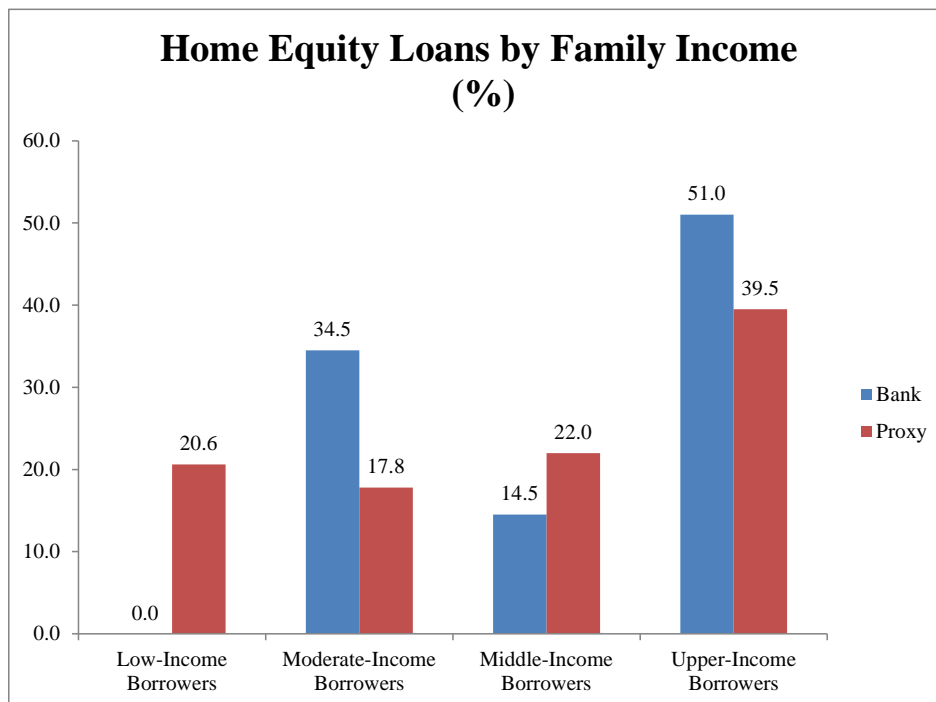


Further analysis of small business lending shows 38.5% of Cortland’s small business loans were for \$100,000 or less, demonstrating Cortland’s willingness to lend in smaller amounts that are typically requested by small businesses. Therefore, the distribution of small business loans to businesses of different sizes is adequate.



Consumer Lending (Home Equity Loans)

Cortland originated 57 home equity loans totaling \$3.1 million within the assessment area during this review period. As shown below, Cortland’s consumer lending to low-income borrowers was substantially below the percentage of families (proxy), but exceeded proxy for moderate-income borrowers. Overall, Cortland’s performance was below proxy to middle-income borrowers and exceeded proxy to upper-income borrowers. Therefore, the borrower distribution of consumer home equity loans is considered good.



Community Development Test

Community development performance in the Youngstown MSA is considered excellent. The qualified community development activities discussed below were found to be responsive to needs in the assessment area.

Community Development Loans

Cortland originated two loans totaling \$746,201 that helped purchase 40 single family low-income subsidized rental residential housing units in Mahoning County. The third loan totaling \$75,000 provided funds to build a United Way headquarters in Trumbull County. This organization helps fund services to low- and moderate-income individuals and families in the county. These loans that support affordable housing and services to low- and moderate-income individuals are deemed to be responsive, as the community contact specifically mentioned the need for funding affordable housing projects. Additionally, area poverty rates support the need for services that provide assistance to low- and moderate-income individuals and families.

Community Development Investments

During this evaluation period, Cortland invested \$1.9 million in a Community Development Financial Institutions (CDFI) Fund certified for community development. The fund promotes permanent job creation, retention, and/or improvement in low- or moderate-income areas or for low- and moderate-income persons who are employed by small businesses. This investment helped retain three businesses located in moderate-income tracts and created/retained 62 jobs in Mahoning County. This investment also helped retain one business located in a moderate-income tract and created/retained 40 jobs in Mahoning County. This investment was deemed to be responsive due to the high unemployment rate. Additionally, as the community contact stated the area has lost employment, helping to create and retain jobs in this assessment area is considered to be responsive.

Cortland made eight qualified small-dollar donations during this review period totaling \$11,346 in this assessment area. These small-dollar donations primarily helped support six non-profit organizations that provide services to low- and moderate-income individuals and families and two organizations that promote economic development activities.

Community Development Services

Four employees conducted five financial literacy education sessions to low- and moderate-income high school students and one employee provided financial expertise as a panelist for a seminar for women small business owners/entrepreneurs. Two senior officers provided their financial expertise to the community by serving on the boards of seven different organizations that promote or facilitate services for low- and moderate-income individuals and families or economic development primarily within Trumbull County.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE
AKRON OH MSA 10420
(Limited-scope Review)**

The Akron MSA consists of Portage and Summit counties; as of November 1, 2016, Cortland revised its assessment area to include the entireties of Portage and Summit counties. This assessment area consists of a total of 170 census tracts comprising 24 low-income (14.1%), 38 moderate-income (22.4%), 65 middle-income (38.2%), and 43 upper-income (25.3%) census tracts.

As of June 30, 2016,⁷ Cortland ranked 22nd out of 22 institutions in this market with \$41.3 million in deposits, representing a market share of 0.3% in the Akron MSA. Cortland operates two branches with full-service ATMs and a loan production office in this assessment area.

The following table page shows the demographics for this assessment area using data from the 2010 U.S. Census.

⁷ <http://www2.fdic.gov/sod/sodMarketBank.asp>

Combined Demographics Report

Assessment Area(s): Akron, OHMSA 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	24	14.1	12,826	7	4,443	34.6	38,129	20.8
Moderate-income	38	22.4	36,260	19.7	6,246	17.2	32,682	17.8
Middle-income	65	38.2	74,699	40.7	5,233	7	40,418	22
Upper-income	43	25.3	59,811	32.6	1,685	2.8	72,367	39.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	170	100.0	183,596	100.0	17,607	9.6	183,596	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	29,127	9,064	4.6	31.1	15,123	51.9	4,940	17
Moderate-income	69,213	37,357	18.9	54	24,627	35.6	7,229	10.4
Middle-income	124,380	83,460	42.2	67.1	31,658	25.5	9,262	7.4
Upper-income	88,454	67,884	34.3	76.7	15,768	17.8	4,802	5.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	311,174	197,765	100.0	63.6	87,176	28.0	26,233	8.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	2,325	7.2	1,977	6.7	337	11.7	11	8.3
Moderate-income	5,031	15.6	4,475	15.3	535	18.6	21	15.8
Middle-income	11,942	37	11,037	37.7	853	29.7	52	39.1
Upper-income	12,999	40.2	11,806	40.3	1,144	39.9	49	36.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	32,297	100.0	29,295	100.0	2,869	100.0	133	100.0
Percentage of Total Businesses:				90.7		8.9		.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	1	0.3	1	0.3	0	0	0	0
Moderate-income	43	11.7	41	11.3	2	50	0	0
Middle-income	219	59.8	217	59.9	2	50	0	0
Upper-income	103	28.1	103	28.5	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	366	100.0	362	100.0	4	100.0	0	.0
Percentage of Total Farms:				98.9		1.1		.0

2015 FFIEC Census Data and 2015 D&B Information

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
AKRON MSA 10420**

Through the use of available facts and data (refer to core tables accompanying this report), including performance and demographic information, performance in the Akron MSA was evaluated and compared with Cortland's overall performance in Ohio. The conclusions regarding performance are provided in the table below.

Assessment Area	Lending Test	Community Development Test
Akron MSA	Below	Below

For the lending test, performance in this assessment area was below Cortland's overall performance. A lesser geographic distribution of loans contributed to weaker performance in the Akron MSA. Additionally, this assessment area had significant lending gaps.

For the community development test, performance in this assessment area was below Cortland's overall performance. While this assessment area benefited from an investment that helped various counties throughout Ohio, Cortland had no qualified community development activities in this assessment area, which contributed to weaker performance in this assessment area.

The performance in this limited-scope assessment area did not change the overall CRA rating.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
NONMETROPOLITAN OHIO AREA
(Limited-scope Review)**

Nonmetropolitan Ohio consists of two middle-income census tracts located in the southernmost portion of Ashtabula County.

As of June 30, 2016,⁸ Cortland ranked ninth out of nine institutions in this market with \$10.3 million in deposits, representing a market share of 1.0% in Ashtabula County. Cortland operates one branch with a full-service ATM in Williamsfield Township.

The table on the following page shows the demographics for this assessment area using data from the 2010 U.S. Census.

⁸ <http://www2.fdic.gov/sod/sodMarketBank.asp>

Combined Demographics Report

Assessment Area(s): Non Metro Ohio 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	548	19.6
Moderate-income	0	0	0	0	0	0	569	20.4
Middle-income	2	100	2,795	100	278	9.9	792	28.3
Upper-income	0	0	0	0	0	0	886	31.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	2	100.0	2,795	100.0	278	9.9	2,795	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	4,774	3,178	100	66.6	685	14.3	911	19.1
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	4,774	3,178	100.0	66.6	685	14.3	911	19.1
	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
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	511	100	469	100	27	100	15	100
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	511	100.0	469	100.0	27	100.0	15	100.0
Percentage of Total Businesses:			91.8		5.3		2.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	71	100	70	100	1	100	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	71	100.0	70	100.0	1	100.0	0	.0
Percentage of Total Farms:			98.6		1.4		.0	

2015 FFIEC Census Data and 2015 D&B Information

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

Through the use of available facts and data (refer to core tables accompanying this report), including performance and demographic information, performance in Nonmetropolitan Ohio was evaluated and compared with Cortland’s overall performance in Ohio. The conclusions regarding performance are provided in the table below.

Assessment Area	Lending Test	Community Development Test
Nonmetropolitan Ohio	Consistent	Below

For the lending test, performance in this assessment area was below Cortland’s overall performance. This assessment area had no lending gaps.

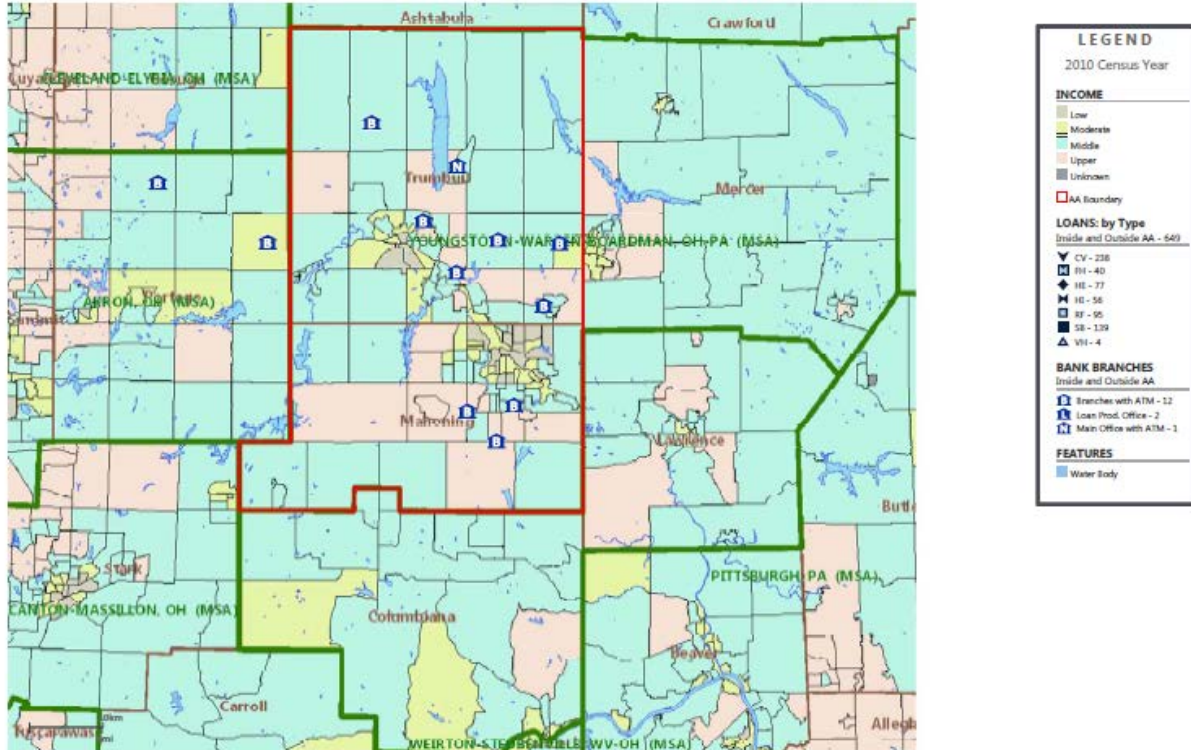
For the community development test, performance in this assessment area was below Cortland’s overall performance. While this assessment area benefited from an investment that helped retain a business located in a moderate-income tract in Ashtabula County adjacent to this assessment area and an investment that helped various counties throughout Ohio, Cortland made one qualified small dollar donation during this review period totaling \$250 in this assessment area. This donation helped a non-profit organization that provides services to low- and moderate-income individuals and families. The lesser community development activity contributed to weaker performance in this assessment area.

The performance in this limited-scope assessment area did not change the overall CRA rating.

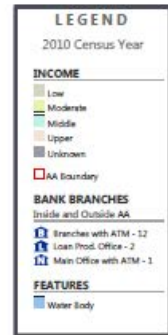
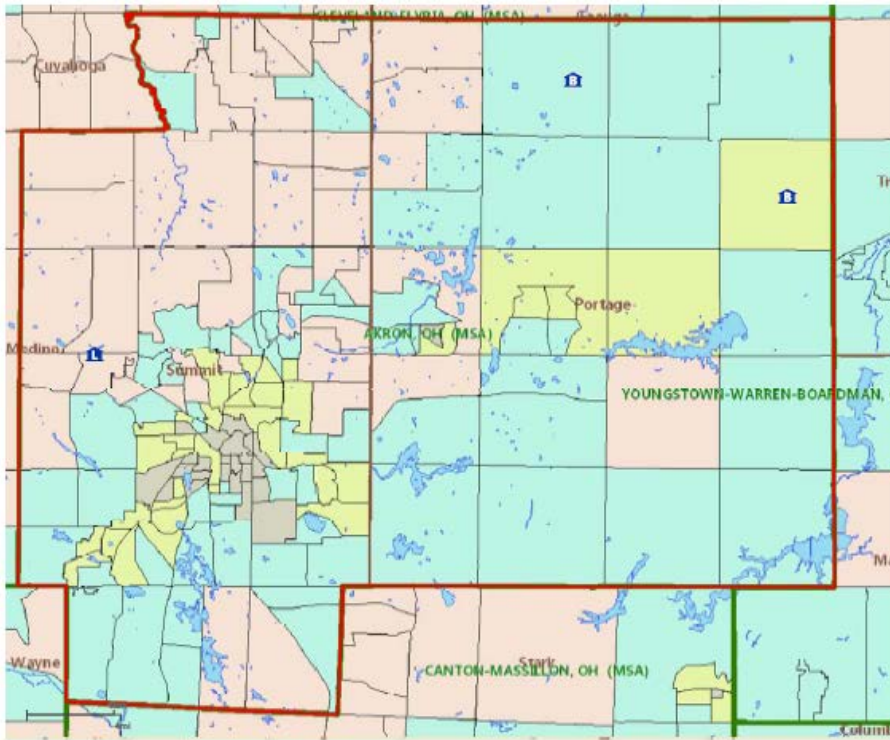
APPENDIX A

ASSESSMENT AREA MAPS

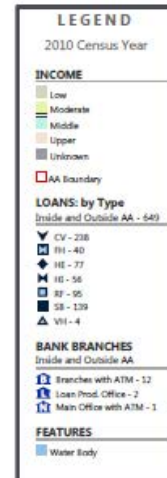
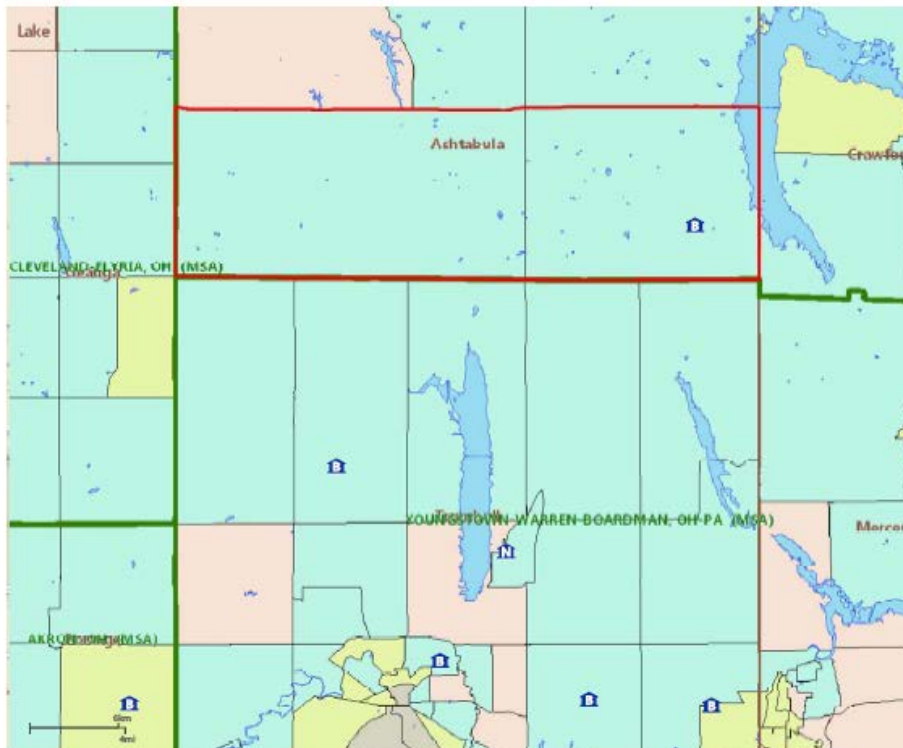
Assessment Area: Youngstown-Warren-Boardman, OH-PA, MSA



Assessment Area: Akron OH, MSA



Assessment Area: Non Metro OH



APPENDIX B

LENDING TABLES

CRA Loan Distribution Table

Exam: Cortland

Assessment Area/Group: Youngstown-Warren-Boardman, OH-PA MSA 2015

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	6	6.3%	510	0.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	5.2%	2,051	2.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	11	11.5%	2,561	3.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	49	51.0%	45,018	61.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	36	37.5%	25,821	35.2%	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	96	100.0%	73,400	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	56	58.3%	28,174	38.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	34	35.4%	30,415	41.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	6	6.3%	14,811	20.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	96	100.0%	73,400	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	37	38.5%	1,797	2.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	23	24.0%	3,876	5.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	18	18.8%	9,879	13.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	18	18.8%	57,847	78.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	96	100.0%	73,400	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	29	51.8%	1,353	4.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	12	21.4%	1,939	6.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	14.3%	4,540	16.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	7	12.5%	20,342	72.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	56	100.0%	28,174	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Cortland

Assessment Area/Group: Akron, OH MSA 2015

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	60.0%	4,289	67.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	2	40.0%	2,115	33.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	6,404	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	3	60.0%	5,569	87.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	2	40.0%	835	13.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	6,404	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	40.0%	244	3.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	20.0%	720	11.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	2	40.0%	5,440	84.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	6,404	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	33.3%	129	2.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	2	66.7%	5,440	97.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	5,569	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Cortland

Assessment Area/Group: Non Metro Ohio 2015

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	1	100.0%	425	100.0%	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%	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	1	100.0%	425	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	1	100.0%	425	100.0%	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	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	425	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	100.0%	425	100.0%	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	1	100.0%	425	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	100.0%	425	100.0%	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	1	100.0%	425	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: Cortland

Assessment Area/Group :Youngstown-Warren-Boardman, OH-PA MSA 2015

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	2	1.1%	430	1.7%	11	6.0%	558	2.2%
Moderate	9	4.9%	628	2.4%	36	19.6%	2,402	9.3%
Low/Moderate Total	11	6.0%	1,058	4.1%	47	25.5%	2,960	11.5%
Middle	96	52.2%	10,705	41.7%	45	24.5%	5,372	20.9%
Upper	77	41.8%	13,935	54.2%	88	47.8%	16,523	64.3%
Unknown	0	0.0%	0	0.0%	4	2.2%	843	3.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	184	100.0%	25,698	100.0%	184	100.0%	25,698	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	5	8.1%	194	1.9%
Moderate	2	3.2%	133	1.3%	8	12.9%	669	6.7%
Low/Moderate Total	2	3.2%	133	1.3%	13	21.0%	863	8.7%
Middle	34	54.8%	3,836	38.5%	15	24.2%	1,818	18.3%
Upper	26	41.9%	5,986	60.1%	33	53.2%	7,164	72.0%
Unknown	0	0.0%	0	0.0%	1	1.6%	110	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	62	100.0%	9,955	100.0%	62	100.0%	9,955	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	1	2.3%	30	1.7%
Moderate	1	2.3%	50	2.8%	12	27.9%	291	16.5%
Low/Moderate Total	1	2.3%	50	2.8%	13	30.2%	321	18.2%
Middle	30	69.8%	1,009	57.2%	8	18.6%	205	11.6%
Upper	12	27.9%	705	40.0%	20	46.5%	1,028	58.3%
Unknown	0	0.0%	0	0.0%	2	4.7%	210	11.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	43	100.0%	1,764	100.0%	43	100.0%	1,764	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	2	0.7%	430	1.1%	17	5.9%	782	2.1%
Moderate	12	4.2%	811	2.2%	56	19.4%	3,362	9.0%
Low/Moderate Total	14	4.8%	1,241	3.3%	73	25.3%	4,144	11.1%
Middle	160	55.4%	15,550	41.6%	68	23.5%	7,395	19.8%
Upper	115	39.8%	20,626	55.1%	141	48.8%	24,715	66.1%
Unknown	0	0.0%	0	0.0%	7	2.4%	1,163	3.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	289	100.0%	37,417	100.0%	289	100.0%	37,417	100.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: Cortland

Assessment Area/Group :Akron, OH MSA 2015

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	3	6.1%	209	2.0%
Moderate	5	10.2%	436	4.2%	6	12.2%	652	6.3%
Low/Moderate Total	5	10.2%	436	4.2%	9	18.4%	861	8.4%
Middle	15	30.6%	2,803	27.2%	9	18.4%	968	9.4%
Upper	29	59.2%	7,054	68.5%	30	61.2%	8,325	80.9%
Unknown	0	0.0%	0	0.0%	1	2.0%	139	1.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	49	100.0%	10,293	100.0%	49	100.0%	10,293	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	9.1%	112	5.5%
Moderate	0	0.0%	0	0.0%	3	27.3%	474	23.4%
Low/Moderate Total	0	0.0%	0	0.0%	4	36.4%	586	29.0%
Middle	7	63.6%	1,114	55.1%	4	36.4%	557	27.5%
Upper	4	36.4%	908	44.9%	3	27.3%	879	43.5%
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	11	100.0%	2,022	100.0%	11	100.0%	2,022	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	3	33.3%	28	8.8%
Moderate	3	33.3%	8	2.5%	2	22.2%	28	8.8%
Low/Moderate Total	3	33.3%	8	2.5%	5	55.6%	56	17.6%
Middle	4	44.4%	84	26.4%	2	22.2%	36	11.3%
Upper	2	22.2%	226	71.1%	2	22.2%	226	71.1%
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	9	100.0%	318	100.0%	9	100.0%	318	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%	7	10.1%	349	2.8%
Moderate	8	11.6%	444	3.5%	11	15.9%	1,154	9.1%
Low/Moderate Total	8	11.6%	444	3.5%	18	26.1%	1,503	11.9%
Middle	26	37.7%	4,001	31.7%	15	21.7%	1,561	12.4%
Upper	35	50.7%	8,188	64.8%	35	50.7%	9,430	74.6%
Unknown	0	0.0%	0	0.0%	1	1.4%	139	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	69	100.0%	12,633	100.0%	69	100.0%	12,633	100.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: Cortland

Assessment Area/Group :Non Metro Ohio 2015

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	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%
Refinance								
Low	0	0.0%	0	0.0%	1	50.0%	6	17.1%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	50.0%	6	17.1%
Middle	2	100.0%	35	100.0%	1	50.0%	29	82.9%
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	2	100.0%	35	100.0%	2	100.0%	35	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	50.0%	15	21.7%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	50.0%	15	21.7%
Middle	2	100.0%	69	100.0%	1	50.0%	54	78.3%
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	2	100.0%	69	100.0%	2	100.0%	69	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%	2	50.0%	21	20.2%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	2	50.0%	21	20.2%
Middle	4	100.0%	104	100.0%	2	50.0%	83	79.8%
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	4	100.0%	104	100.0%	4	100.0%	104	100.0%

*Information based on 2010 ACS data

Consumer Loan Distribution Table

Exam: Cortland

Assessment Area/Group :Youngstown-Warren-Boardman, OH-PA MSA 2015

	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	7	12.3%	347	11.1%	19	33.3%	935	29.9%
Low/Moderate Total	7	12.3%	347	11.1%	19	33.3%	935	29.9%
Middle	32	56.1%	1,641	52.5%	8	14.0%	301	9.6%
Upper	18	31.6%	1,137	36.4%	28	49.1%	1,781	57.0%
Unknown	0	0.0%	0	0.0%	2	3.5%	109	3.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	57	100.0%	3,126	100.0%	57	100.0%	3,126	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	7	12.3%	347	11.1%	19	33.3%	935	29.9%
Low/Moderate Total	7	12.3%	347	11.1%	19	33.3%	935	29.9%
Middle	32	56.1%	1,641	52.5%	8	14.0%	301	9.6%
Upper	18	31.6%	1,137	36.4%	28	49.1%	1,781	57.0%
Unknown	0	0.0%	0	0.0%	2	3.5%	109	3.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	57	100.0%	3,126	100.0%	57	100.0%	3,126	100.0%

Consumer Loan Distribution Table

Exam: Cortland

Assessment Area/Group :Akron, OH MSA 2015

	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%	2	22.2%	120	14.8%
Low/Moderate Total	0	0.0%	0	0.0%	2	22.2%	120	14.8%
Middle	7	77.8%	565	69.5%	1	11.1%	50	6.1%
Upper	2	22.2%	249	30.5%	5	55.6%	635	78.1%
Unknown	0	0.0%	0	0.0%	1	11.1%	9	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	814	100.0%	9	100.0%	814	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	22.2%	120	14.8%
Low/Moderate Total	0	0.0%	0	0.0%	2	22.2%	120	14.8%
Middle	7	77.8%	565	69.5%	1	11.1%	50	6.1%
Upper	2	22.2%	249	30.5%	5	55.6%	635	78.1%
Unknown	0	0.0%	0	0.0%	1	11.1%	9	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	814	100.0%	9	100.0%	814	100.0%

Consumer Loan Distribution Table

Exam: Cortland

Assessment Area/Group :Non Metro Ohio 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	1	20.0%	10	3.3%
Moderate	0	0.0%	0	0.0%	1	20.0%	35	11.5%
Low/Moderate Total	0	0.0%	0	0.0%	2	40.0%	45	14.8%
Middle	5	100.0%	302	100.0%	1	20.0%	98	32.5%
Upper	0	0.0%	0	0.0%	2	40.0%	159	52.7%
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	5	100.0%	302	100.0%	5	100.0%	302	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	1	20.0%	10	3.3%
Moderate	0	0.0%	0	0.0%	1	20.0%	35	11.5%
Low/Moderate Total	0	0.0%	0	0.0%	2	40.0%	45	14.8%
Middle	5	100.0%	302	100.0%	1	20.0%	98	32.5%
Upper	0	0.0%	0	0.0%	2	40.0%	159	52.7%
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	5	100.0%	302	100.0%	5	100.0%	302	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Cortland

Selected Year: 2015

Youngstown-Warren-Boardman, OH-PA MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	24	0.52%	1,388	0.27%	312	6.76%	18,041	3.48%
Moderate	280	6.07%	18,219	3.51%	955	20.7%	73,438	14.16%
<i>Low/Moderate Total</i>	<i>304</i>	<i>6.59%</i>	<i>19,607</i>	<i>3.78%</i>	<i>1,267</i>	<i>27.47%</i>	<i>91,479</i>	<i>17.64%</i>
Middle	2,688	58.27%	259,547	50.06%	1,028	22.28%	106,535	20.55%
Upper	1,621	35.14%	239,359	46.16%	1,411	30.59%	230,455	44.45%
Unknown	0	0.0%	0	0.0%	907	19.66%	90,044	17.37%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4,613	100.0%	518,513	100.0%	4,613	100.0%	518,513	100.0%
	Refinance							
Low	29	0.9%	1,413	0.43%	200	6.22%	10,684	3.26%
Moderate	215	6.68%	12,624	3.85%	496	15.42%	32,969	10.05%
<i>Low/Moderate Total</i>	<i>244</i>	<i>7.58%</i>	<i>14,037</i>	<i>4.28%</i>	<i>696</i>	<i>21.64%</i>	<i>43,653</i>	<i>13.31%</i>
Middle	1,808	56.2%	162,517	49.56%	741	23.03%	61,864	18.87%
Upper	1,165	36.21%	151,355	46.16%	1,248	38.79%	159,525	48.65%
Unknown	0	0.0%	0	0.0%	532	16.54%	62,867	19.17%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,217	100.0%	327,909	100.0%	3,217	100.0%	327,909	100.0%
	Home Improvement							
Low	15	2.18%	199	0.77%	55	7.98%	1,110	4.28%
Moderate	61	8.85%	1,204	4.64%	142	20.61%	3,168	12.22%
<i>Low/Moderate Total</i>	<i>76</i>	<i>11.03%</i>	<i>1,403</i>	<i>5.41%</i>	<i>197</i>	<i>28.59%</i>	<i>4,278</i>	<i>16.5%</i>
Middle	412	59.8%	13,411	51.71%	173	25.11%	4,495	17.33%
Upper	201	29.17%	11,119	42.88%	293	42.53%	15,389	59.34%
Unknown	0	0.0%	0	0.0%	26	3.77%	1,771	6.83%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	689	100.0%	25,933	100.0%	689	100.0%	25,933	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	4.44%	5,750	25.22%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>2</i>	<i>4.44%</i>	<i>5,750</i>	<i>25.22%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	38	84.44%	15,978	70.09%	0	0.0%	0	0.0%
Upper	5	11.11%	1,069	4.69%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	45	100.0%	22,797	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	45	100.0%	22,797	100.0%	45	100.0%	22,797	100.0%
	HMDA Totals							
Low	68	0.79%	3,000	0.34%	567	6.62%	29,835	3.33%
Moderate	558	6.52%	37,797	4.22%	1,593	18.6%	109,575	12.24%
<i>Low/Moderate Total</i>	<i>626</i>	<i>7.31%</i>	<i>40,797</i>	<i>4.56%</i>	<i>2,160</i>	<i>25.22%</i>	<i>139,410</i>	<i>15.57%</i>
Middle	4,946	57.75%	451,453	50.43%	1,942	22.68%	172,894	19.31%
Upper	2,992	34.94%	402,902	45.01%	2,952	34.47%	405,369	45.28%
Unknown	0	0.0%	0	0.0%	1,510	17.63%	177,479	19.83%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8,564	100.0%	895,152	100.0%	8,564	100.0%	895,152	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Cortland
Akron, OH MSA 2015

Selected Year: 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	200	1.92%	11,783	0.74%	1,040	10.0%	75,328	4.75%
Moderate	1,447	13.91%	120,731	7.61%	2,187	21.03%	231,508	14.59%
<i>Low/Moderate Total</i>	<i>1,647</i>	<i>15.84%</i>	<i>132,514</i>	<i>8.35%</i>	<i>3,227</i>	<i>31.03%</i>	<i>306,836</i>	<i>19.34%</i>
Middle	4,303	41.38%	545,479	34.38%	2,194	21.1%	310,213	19.55%
Upper	4,450	42.79%	908,711	57.27%	3,167	30.45%	719,198	45.33%
Unknown	0	0.0%	0	0.0%	1,812	17.42%	250,457	15.78%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10,400	100.0%	1,586,704	100.0%	10,400	100.0%	1,586,704	100.0%
	Refinance							
Low	139	2.01%	10,298	1.05%	494	7.14%	37,458	3.82%
Moderate	838	12.12%	71,756	7.32%	1,032	14.92%	98,661	10.06%
<i>Low/Moderate Total</i>	<i>977</i>	<i>14.12%</i>	<i>82,054</i>	<i>8.37%</i>	<i>1,526</i>	<i>22.06%</i>	<i>136,119</i>	<i>13.88%</i>
Middle	2,918	42.19%	352,012	35.89%	1,372	19.84%	164,928	16.81%
Upper	3,022	43.69%	546,853	55.75%	2,588	37.42%	474,059	48.33%
Unknown	0	0.0%	0	0.0%	1,431	20.69%	205,813	20.98%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6,917	100.0%	980,919	100.0%	6,917	100.0%	980,919	100.0%
	Home Improvement							
Low	33	4.19%	1,874	3.38%	98	12.44%	2,793	5.04%
Moderate	139	17.64%	4,893	8.84%	157	19.92%	5,841	10.55%
<i>Low/Moderate Total</i>	<i>172</i>	<i>21.83%</i>	<i>6,767</i>	<i>12.22%</i>	<i>255</i>	<i>32.36%</i>	<i>8,634</i>	<i>15.59%</i>
Middle	301	38.2%	15,075	27.22%	162	20.56%	8,421	15.21%
Upper	315	39.97%	33,536	60.56%	337	42.77%	33,955	61.31%
Unknown	0	0.0%	0	0.0%	34	4.31%	4,368	7.89%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	788	100.0%	55,378	100.0%	788	100.0%	55,378	100.0%
	Multi-Family							
Low	10	13.7%	10,001	3.54%	0	0.0%	0	0.0%
Moderate	14	19.18%	26,727	9.47%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>24</i>	<i>32.88%</i>	<i>36,728</i>	<i>13.01%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	25	34.25%	101,650	36.01%	0	0.0%	0	0.0%
Upper	24	32.88%	143,884	50.98%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	73	100.0%	282,262	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	73	100.0%	282,262	100.0%	73	100.0%	282,262	100.0%
	HMDA Totals							
Low	382	2.1%	33,956	1.17%	1,632	8.98%	115,579	3.98%
Moderate	2,438	13.41%	224,107	7.71%	3,376	18.57%	336,010	11.57%
<i>Low/Moderate Total</i>	<i>2,820</i>	<i>15.51%</i>	<i>258,063</i>	<i>8.88%</i>	<i>5,008</i>	<i>27.55%</i>	<i>451,589</i>	<i>15.54%</i>
Middle	7,547	41.52%	1,014,216	34.91%	3,728	20.51%	483,562	16.64%
Upper	7,811	42.97%	1,632,984	56.21%	6,092	33.51%	1,227,212	42.24%
Unknown	0	0.0%	0	0.0%	3,350	18.43%	742,900	25.57%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	18,178	100.0%	2,905,263	100.0%	18,178	100.0%	2,905,263	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 refinancings of home improvement and home purchase loans.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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