

PUBLIC DISCLOSURE

November 1, 2010

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Citizens Banking Company
542528

100 East Water Street
Sandusky, Ohio 44870

Federal Reserve Bank of Cleveland
Cleveland, Ohio

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

The major factors and criteria contributing to this rating include:

- A reasonable loan-to-deposit ratio given the bank's size, financial condition, and assessment area credit needs;
- A substantial majority of loans are in the bank's assessment area;
- A reasonable geographic distribution of loans throughout the assessment area;
- A reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes given the demographics of the assessment area;
- No complaints received about the institution's performance in meeting assessment area credit needs; and,
- An adequate level of responsiveness to the community development needs of its assessment area through community development loans, investments, and services considering the institution's capacity and the need and availability of opportunities for community development in the assessment areas.

The previous CRA examination conducted October 20, 2008 resulted in a rating of "Satisfactory."

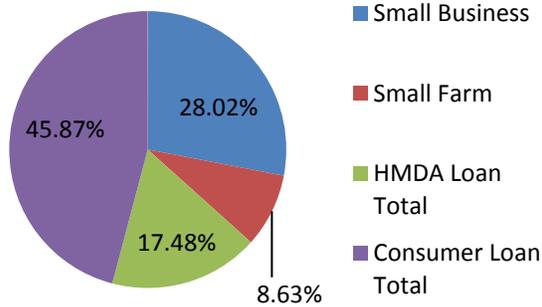
SCOPE OF EXAMINATION

The Citizens Banking Company (Citizens) lending performance was evaluated using loan data for the period of January 1, 2009 through June 30, 2010. The lending products reviewed for this evaluation included mortgage loans subject to the reporting requirements of the Home Mortgage Disclosure Act (HMDA), consumer loans, small business loans, and small farm loans. HMDA mortgage loans included home purchase, home refinance, and home improvement loans. Consumer loans included home equity, motor vehicle, other-secured, and unsecured loans. In order to conduct a meaningful analysis within each assessment area, the HMDA loans were grouped together and consumer loans were grouped together.

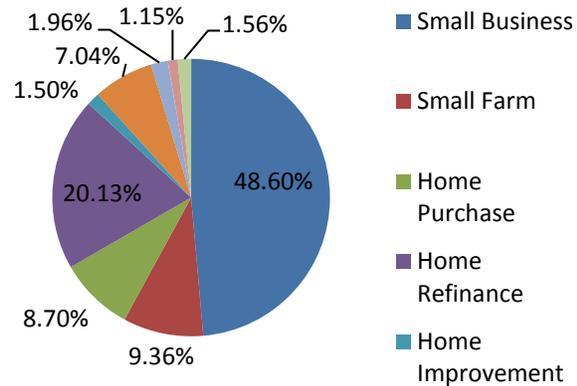
The following table and charts illustrate the volume and distribution of loans originated during the evaluation period:

Loan Type	Number of Loans	Dollar Amount of Loans (000's)
Small Business	526	\$55,146
Small Farm	162	\$10,624
<i>CRA Loan Total</i>	688	\$65,770
Home Purchase	84	\$9,870
Home Refinance	174	\$22,845
Home Improvement	70	\$1,702
<i>HMDA Loan Total</i>	328	\$34,417
Home Equity	136	\$7,987
Motor Vehicle	243	\$2,228
Other-Secured	165	\$1,306
Unsecured	317	\$1,764
<i>Consumer Loan Total</i>	861	\$13,285
<i>Total Loans</i>	1,877	\$113,472

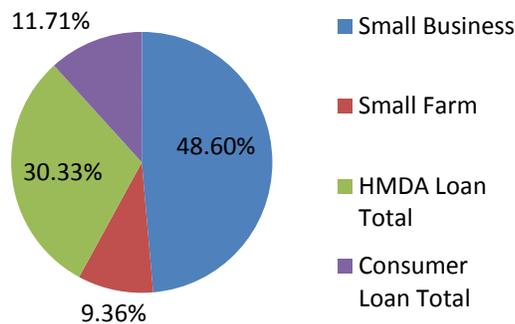
Originated Loans (#)



Originated Loans (\$)



Originated Loans (\$)



Given the above distribution, small business loans received the greatest weight, followed by HMDA loans, consumer loans, and small farm loans.

The borrower distribution analysis under the lending test received greater weight than the geographic distribution analysis because the total assessment area is comprised mostly of middle-income and upper-income tracts.

A review of Citizens' qualified community development loans, investments, and services were reviewed for the period of October 21, 2008 through October 31, 2010 and were reviewed as part of the Community Development Test.

The CRA Intermediate Small Bank procedures were used for this evaluation based on the fluctuation the bank's asset size over the past three years and meeting the asset requirements for an Intermediate Small Bank.

Citizens' has several assessment areas throughout the State of Ohio. The bank is predominantly in the north central part of the state, portions of western central Ohio, and an assessment area in portions of Summit County. A breakdown of assessment areas are as follows:

Akron, Ohio MSA 10420

- Portions of Summit County

Columbus, Ohio MSA 18140

- Northwestern portion of Franklin County
- Southwestern portion of Delaware County
- Northern portion of Madison County

Mansfield, Ohio MSA 31900

- Northern and central portion of Richland County

Sandusky, Ohio 41780 MSA

- Erie County

Toledo, Ohio 45780 MSA

- Eastern portion of Ottawa County

Nonmetropolitan Area North Central Ohio

- Crawford County
- Huron County
- Eastern portion of Seneca County

Nonmetropolitan West Central Ohio

- Champaign County
- Logan County

Citizens' assessment areas in Sandusky, Ohio MSA 41780 and Nonmetropolitan North Central Ohio are given the largest amount of weight in this evaluation because they contain the largest percentage of branches and originated the largest amount of loans by volume. Citizens' main office is located in the Sandusky, Ohio MSA 41780 and of the 28 offices located throughout Citizens' assessment area, 14 (50.0%) are located within these two assessment areas. The following table lists the bank's assessment areas in order of weight ranking (loan share concentrations are based on the amount of loans originated in each assessment area).

Assessment Area	Number of Offices	Percent of Offices	Deposit Share ¹	Small Business Loan Share	HMDA Loan Share	Consumer Loan Share
Sandusky, Ohio 41780 MSA	6	21.4%	43.2%	34.3%	45.1%	38.7%
Nonmetropolitan Area North Central Ohio	8	28.6%	19.5%	23.9%	19.5%	30.7%
Mansfield, Ohio 31900 MSA	4	14.3%	12.5%	20.7%	14.6%	15.0%
Nonmetropolitan West Central Ohio	5	17.8%	15.9%	13.5%	11.9%	12.7%
Columbus, Ohio MSA 18140	3	10.7%	6.8%	2.1%	2.4%	1.6%
Toledo, Ohio 45780 MSA	1	3.6%	0.5%	4.2%	5.5%	1.0%
Akron, Ohio MSA 10420	1	3.6%	1.6%	1.3%	1.0%	0.3%
Totals	28	100%	100%	100%	100%	100%

Consumer lending by volume represents 45.9% of lending and weighted most heavily, followed by small business lending at 28.0%, HMDA lending at 17.5%, and small farm loans at 8.6%. Due to the low volume of farm loans within some of the assessment areas, an analysis was not performed.

Five interviews within the bank’s market were conducted to gain a better prospective of the community needs. Details from these interviews are presented in subsequent sections of this performance evaluation.

Based on deposit share and lending activity, the following review was completed on each of the assessment areas:

- Akron, Ohio MSA 10420 – Limited Review
- Columbus, Ohio MSA 18140 – Limited Review
- Mansfield, Ohio MSA 31900 – Full Review
- Sandusky, Ohio MSA 41780 – Full Review
- Toledo, Ohio MSA 45780 – Limited Review
- Nonmetropolitan Area North Central Ohio – Full Review
- Nonmetropolitan Area West Central Ohio – Full Review

The following table illustrates the demographics of the total assessment area based on data from the 2000 Census:

¹ Based on the FDIC’s deposit market share report as of June 30, 2010

Combined Demographics Report

Citizens Banking Company

Assessment Group(s): Overall

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	0.7	82	0.0	7	8.5	23,848	14.0
Moderate-income	16	11.7	13,773	8.1	2,395	17.4	28,205	16.5
Middle-income	78	56.9	94,767	55.6	5,438	5.7	39,160	23.0
Upper-income	42	30.7	61,833	36.3	1,405	2.3	79,242	46.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	137	100.0	170,455	100.0	9,245	5.4	170,455	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	225	58	0.0	25.8	121	53.8	46	20.4
Moderate-income	24,931	12,267	7.0	49.2	10,131	40.6	2,533	10.2
Middle-income	156,600	97,594	55.8	62.3	39,845	25.4	19,161	12.2
Upper-income	89,018	65,130	37.2	73.2	18,453	20.7	5,435	6.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	270,774	175,049	100.0	64.6	68,550	25.3	27,175	10.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	143	0.6	115	0.5	24	1.1	4	0.5
Moderate-income	2,104	8.1	1,852	8.1	188	8.8	64	7.9
Middle-income	13,501	52.2	11,975	52.2	1,043	48.9	483	59.5
Upper-income	10,134	39.2	8,996	39.2	877	41.1	261	32.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	25,882	100.0	22,938	100.0	2,132	100.0	812	100.0
Percentage of Total Businesses:			88.6		8.2		3.1	
	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	20	1.1	20	1.1	0	0.0	0	0.0
Middle-income	1,207	68.7	1,194	68.6	13	72.2	0	0.0
Upper-income	531	30.2	526	30.2	5	27.8	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,758	100.0	1,740	100.0	18	100.0	0	0.0
Percentage of Total Farms:			99.0		1.0		0.0	

DESCRIPTION OF INSTITUTION

Citizens is the sole banking subsidiary and is the primary holding company asset of First Citizens Banc Corp., both of which are located in Sandusky. As of June 30, 2010, Citizens reported \$1.1 billion in total assets, which is the same level of assets at the previous examination date.

At the time of this evaluation, Citizens had:

- 27 branch offices that included full service automated teller machines (ATMs)
- One branch office that does not have an ATM
- One loan operations center that included a cash-dispensing ATM
- Seven stand-alone cash-dispensing ATMs
- One stand-alone cash-dispensing ATM located outside of Citizens' assessment area

The main branch is located at 100 East Water Street in Sandusky, Ohio. Citizens closed one branch since the previous examination located at 900 East Main Street in Crestline, Ohio. This branch was located in a middle-income tract in Crawford County. Customers who banked at that location were referred to a branch approximately ten miles away. However, the ATM services remained at that location.

Also, the following offices and ATMs closed since the previous evaluation:

- Trust office located at 115 S. Market Street in Troy, Ohio
- Loan production office located at 559 E. Center Street in Marion, Ohio
- Loan production office located at 101 N. Main Street in Marysville, Ohio
- ATM located at 3020 Tiffin Avenue in Sandusky, Ohio
- ATM located at 2102 River Ave. in Sandusky, Ohio

Neither the trust office nor the loan production offices accepted deposits or engaged in standard branch activities. The ATMs that were closed were located in middle-income tracts in Erie County.

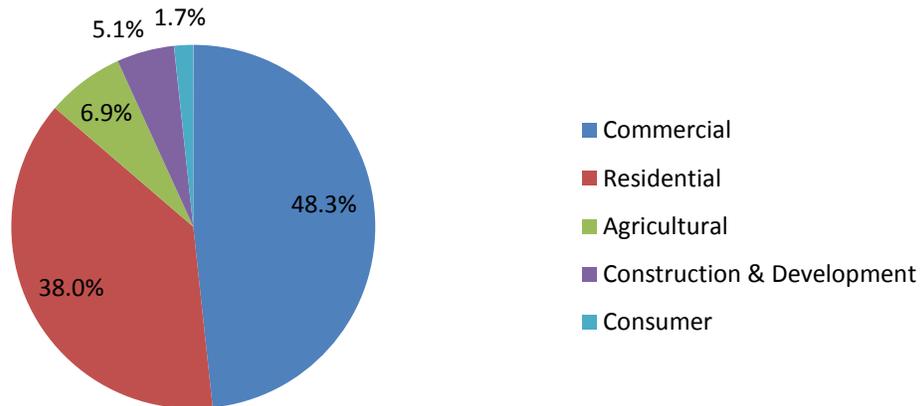
The closing of the loan production offices led to an adjustment of Citizens' assessment area. Specifically, all census tracts in Marion and Union counties previously included in the assessment area were removed. The only presence that Citizens had in these two counties was the loan production offices. The nearest Citizens branch (approximately 24 miles away) to the census tracts in Marion County is in Tiro, Ohio. Although there are branches close to the census tracts in Union County, there has been no lending activity in that area since the loan production office closed. In addition, Union County does not contain any low- or moderate-income tracts.

Citizens is a full-service retail bank offering business and consumer deposit accounts and commercial, agricultural, residential mortgage, and consumer loans. As of June 30, 2010, Citizens had \$771 million in net loans and leases, which is approximately a \$25 million (3.2%) decrease over the previous examination date. Loans comprised 69.1% of the bank's assets, made up of primarily real estate loans by dollar volume. Securities make up the majority of the remaining assets at 17.8%.

The locations of the branches are also indicated on the assessment area maps in Appendix A.

The following chart and table demonstrates the bank’s loan portfolio composition as of June 30, 2010 and the previous two years:

Loan Portfolio Distribution



*Commercial includes commercial and industrial and nonfarm nonresidential loans, Residential includes 1-4 family and multifamily loans, Agricultural includes agricultural and farmland loans.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2010		12/31/2009		12/31/2008	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	40,217 ¹	5.1%	30,068 ¹	3.8%	30,628 ¹	3.9%
Secured by One- to Four- Family Dwellings	269,777 ¹	34.2%	273,831 ¹	34.7%	281,074 ¹	35.4%
Other Real Estate:						
Farmland	43,192 ¹	5.5%	40,721 ¹	5.2%	44,863 ¹	5.6%
Multifamily	30,277 ¹	3.8%	29,731 ¹	3.8%	28,879 ¹	3.6%
Nonfarm nonresidential	308,572 ¹	39.1%	305,921 ¹	38.8%	284,121 ¹	35.8%
Commercial and Industrial	72,702 ¹	9.2%	76,079 ¹	9.6%	84,775 ¹	10.7%
Loans to Individuals	13,195 ¹	1.7%	14,532 ¹	1.8%	17,757 ¹	2.2%
Agricultural Loans	11,360 ¹	1.4%	17,865 ¹	2.3%	21,982 ¹	2.8%
Total	\$789,292¹	100.00%	\$788,748¹	100.00%	\$794,079¹	100.00%

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

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

The bank is rated satisfactory under the lending test.

Loan-to-Deposit Ratio

The following table shows Citizens' quarterly loan-to-deposit (LTD) ratios for the eight quarters since the previous evaluation with the average LTD for the same period. The table includes the national peer ratio, as well as custom peer² ratios that combine 10 local peer institutions.

The Citizens Banking Company Loan-to Deposit Ratios					
As of Date	Net Loans \$(000s)	Total Deposits \$(000s)	Bank Ratio (%)	Peer Ratio (%)	Custom Peer (%)
June 30, 2010	771,090	900,082	85.67	80.52	81.45
March 31, 2010	767,661	893,154	85.95	81.16	81.10
December 31, 2009	775,547	868,343	89.31	83.58	83.05
September 30, 2009	777,408	863,594	90.02	86.54	86.07
June 30, 2009	772,778	880,011	87.81	89.41	85.74
March 31, 2009	782,834	891,819	87.78	90.66	85.60
December 31, 2008	787,769	817,374	96.38	93.54	88.18
September 30, 2008	785,705	779,614	100.78	95.98	87.76
Quarterly Loan-to-Deposit Ratio Average since the previous examination			90.46	87.67	84.87

Citizens has averaged a 90.46% LTD ratio over the past eight quarters. The bank's ratios remained relatively consistent throughout the evaluation period. The slight decline occurred because deposits grew and loans experienced a decline during the evaluation period.

Citizens' average LTD ratio is above the national peer group average LTD ratio of 87.67%³ and the custom peer group average LTD ratio of 84.87%. In addition, the national and custom peer groups have seen similar declines in their average ratio as the bank.

Citizens' loan-to-deposit ratio is reasonable given the bank's size, financial condition, and assessment area credit needs.

2 Custom peer group consists of Farmers & Merchants Bancorp, LNB Bancorp Inc., Croghan Bancshares Inc., Farmers National Banc Corp., Heartland BancCorp, United Bancshares Inc., Commercial Bancshares Inc., CSB Bancorp Inc., Pandora Bancshares Inc., and Consumers Bancorp Inc.

3 Citizens' national peer group consists of all commercial banks having assets between \$1 billion and \$3 billion.

Lending in the Assessment Area

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

Lending Inside and Outside the Assessment Area								
Loan Type	Inside the Assessment Area				Outside the Assessment Area			
	# of Loans	%	\$ (000s)	%	# of Loans	%	\$ (000s)	%
HMDA	328	86.1	34,417	69.1	53	13.9	15,417	30.9
Small Business	526	78.2	55,146	70.4	147	21.8	23,141	29.6
Small Farm	162	81.4	10,624	79.0	37	18.6	2,828	21.0
Consumer	861	92.8	13,285	95.7	67	7.2	603	4.3
Total Loans	1,877	86.1	113,472	73.0	304	13.9	41,989	27.0

The table illustrates that a substantial majority of the bank’s loans, both by number and dollar amount, were made inside of its assessment area.

Geographic and Borrower Distribution

Citizens’ overall geographic and borrower distribution of lending is considered reasonable. A majority of the assessment areas had a reasonable geographic distribution of lending, with one exception where the geographic distribution was poor. In addition, all of the assessment areas had a reasonable borrower distribution of lending. Refer to each assessment area’s performance ratings for further details regarding how these ratings were reached.

Response to Consumer Complaints

No CRA-related complaints were filed against Citizens during this evaluation period.

Community Development Test

The bank is rated satisfactory under the community development test.

Citizens’ community development performance demonstrates an adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services considering its capacity and the needs and availability of such opportunities for community development in its assessment area.

Community Development Loans

Citizens has demonstrated an adequate responsiveness to community development lending needs. The bank originated five community development loans totaling \$3,717,000, a 75.5% increase in dollar amount since the previous evaluation. A majority of the loans were made to organizations that conduct community development services that were targeted to low- and moderate-income individuals. In addition, one loan was extended to an organization that promoted job creation in a middle-income tract that is designated as distressed due to unemployment rates.

Qualified Investments

Citizens has demonstrated an adequate responsiveness to community development investment needs. The bank made 18 qualified community development donations totaling \$94,703 to organizations that provided community development services or economic development. In addition, the bank made one bond investment, totaling \$1.140 million that will be used to provide affordable housing to low- and moderate-income families.

Community Development Services

Citizens has demonstrated an adequate responsiveness to community development service needs.

The bank has 28 branches throughout its market. One (3.6%) located in the moderate-income tracts, 24 (85.71%) located in middle-income tracts and three (10.7%) located in upper-income tracts. There are no branches located in low-income geographies. Details of the bank's branching distribution is discussed within the respective assessment area sections within this performance evaluation.

The bank's employees provided their financial expertise to 18 local organizations that provide community development services, economic development, and/or affordable housing. Details of the bank's community development services are also discussed within the respective assessment areas sections of this performance evaluation.

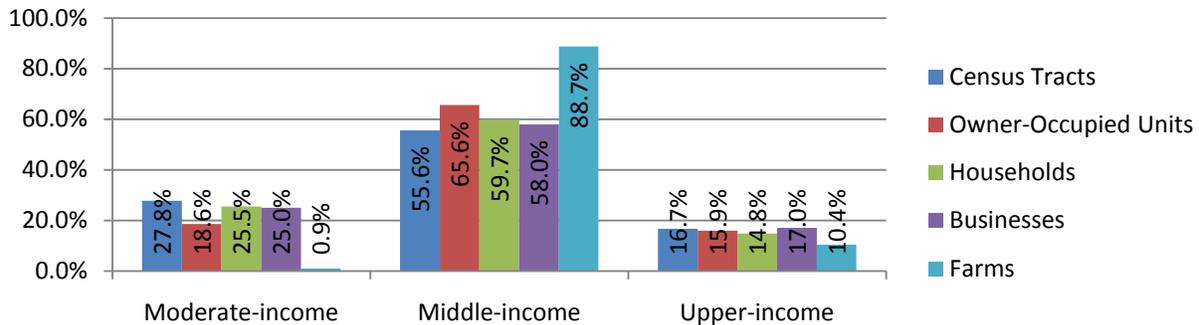
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

DESCRIPTION OF SANDUSKY, OHIO MSA 41780

The Sandusky, Ohio MSA consists of the entirety of Erie County, Ohio. The assessment area has 18 total census tracts, which is comprised of five moderate-income, ten middle-income, and three upper-income census tracts. There are no low-income tracts within this assessment area. The charts below depict the demographic distribution for this assessment area:

Distribution by Tract Income



The table below depicts the 11 financial institutions insured by the Federal Deposit Insurance Corporation (FDIC) that operate in this assessment area:

Institution Name	Number of Offices	Deposits (\$000)	Market Share
CITIZENS BANKING CO	6	389,126	37.35%
KEYBANK NATIONAL ASSN	5	232,152	22.28%
PNC BANK NATIONAL ASSN	4	138,678	13.31%
FIFTH THIRD BANK	2	91,115	8.75%
FIRST FS&LA OF LORAIN	2	76,991	7.39%
FIRSTMERIT BANK NA	1	35,853	3.44%
U S BANK NATIONAL ASSN	2	32,880	3.16%
HOME SAVINGS&LOAN CO	1	29,441	2.83%
FIRST NB OF BELLEVUE	1	9,584	0.92%
FIRST FEDERAL BANK OF OHIO	1	4,325	0.42%
WOODFOREST NATIONAL BANK	1	1,633	0.16%
Number of Institutions in the Market: 11	26	1,041,778	100%

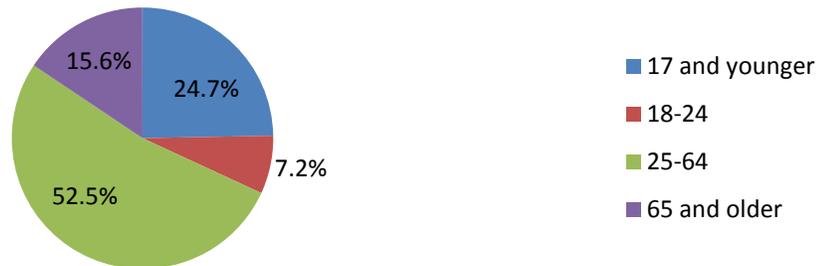
Based on the FDIC’s deposit market share report as of June 30, 2010, Citizens ranked first with 37.35% of the market share of deposits in this area⁴. Within the assessment area, the bank originated 180 small business loans, 333 consumer loans, and 148 HMDA loans. The small business loan share for this assessment area was 34.2%, HMDA loan share was 45%, and consumer loan share was 38.7% compared to the deposit share.

⁴ <http://www2.fdic.gov/sod/index.asp>

Population

Data released by the U.S. Census Bureau in 2000 indicates that the population within the Sandusky MSA assessment area was 79,551. The population by age was distributed as follows:

Population by Age



Income Characteristics

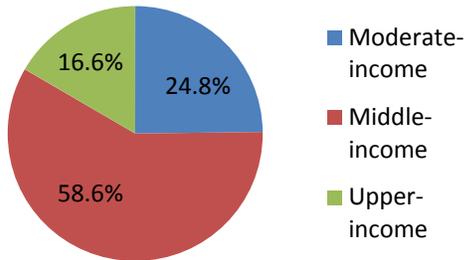
According to the 2000 U.S. Census Bureau report, there were 31,756 households in this area, of which 21,939 (69.1%) were designated as families. Of these families, 19.0% were low-income, 18.6% were moderate-income, 23.3% were middle-income, and 39.1% were upper-income. Further, 6.0% of the families in this assessment area lived below the poverty level, which was lower than the State of Ohio's family poverty rate of 7.8%.

The median family income (MFI) for the assessment area was \$51,747 compared to the State of Ohio's median family income of \$50,037. According to the Department of Housing & Urban Development (HUD), the estimated MFI in this area, increased to \$64,000 in 2010.

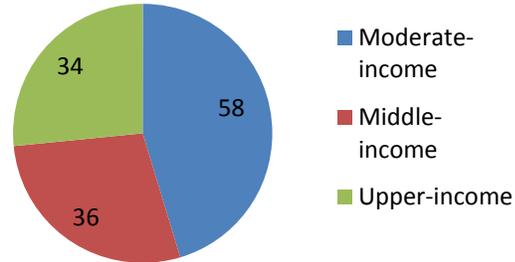
Housing

The Sandusky MSA contains 35,909 housing units; of which 63.6% are owner-occupied, 24.7% are rental units, and 11.7% are vacant properties. Single-family units comprise 74.5% of the housing units, while two-to-four family units comprise 10.2%, multi-family units comprise 10.7%, and mobile homes comprise 4.5%. The median age of the housing stock within the assessment area is 39 years. The following graphs depict the geographic distribution of housing units and the median age of the housing stock in this assessment area:

Distribution of Housing Units



Median Age of Housing Stock



The median housing value for this assessment area was \$107,435. However, 85.7% of the owner-occupied units within the assessment area were valued at \$60,000 or more and 25.2% of owner-occupied units were valued at \$150,000 or more. This is comparable to the state of Ohio’s housing values, where 82.8% of the owner-occupied units were valued at \$60,000 or more and 24% of owner-occupied units were valued at \$150,000 or more.

The following graph depicts the median housing value by tract income:

Median Housing Value



Based on the median family income, approximately half of the homes in this assessment area are considered affordable for low-income individuals and about 75.0% of the homes are affordable for moderate-income individuals, using a mortgage payment equal to 30.0% of gross income.

Labor, Employment, and Economics

The following table illustrates land use in each county in the assessment area:⁵

Urban	Cropland	Pasture	Forest	Wetlands
12.7%	53.4%	10.2%	16.2%	4.8%

As indicated above, the majority of land in this assessment area is used for farming and a significant portion is covered by forest. This results in limited land being available for business use and residential properties.

The assessment area had 2,823 small businesses and 136 small farms, according to the 2008 Dun & Bradstreet data. The top five industries include other services (14.0%); retail trade (12.2%); construction (10.5%); accommodation and food services (8.9%); and professional, scientific, and technical services (8.5%). The majority of businesses (88.8%) have revenues of less than \$1 million annually. Most businesses (76.3%) have been in business for more than ten years with 36.0% of those businesses more than 25 years.

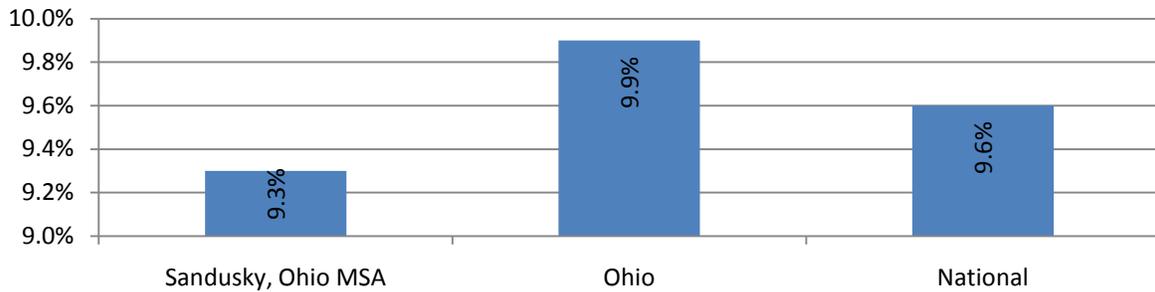
The following table identifies major employers for the assessment area:

Business Name	Industry
Cedar Fair/Cedar Point	Services
Kyklos Bearing Inc	Manufacturing
Firelands Regional Medical Center	Services
Ford Motor Co/ACH	Manufacturing
Freudenberg NOK	Manufacturing
International Automotive Components	Manufacturing
Kalahari Resorts	Services
Meijer Inc	Trade
Sandusky City Schools	Government
State of Ohio	Government

The following chart shows unemployment rates for October 2010 for the assessment area compared to the State of Ohio and national averages:

⁵ www.development.ohio.gov/research

Unemployment Rates October 2010



The chart shows that this assessment area has a slightly lower unemployment rate than both the State of Ohio and the national average.⁶ Although this area has unemployment levels slightly lower than the State of Ohio and national averages, Erie County has been significantly impacted by the economic challenges of recent years, as foreclosure filings have increased considerably.

Data provided by realtytrac.com⁷ indicates that the State of Ohio currently has 93,571 homes in foreclosure. Erie County currently has 774 homes in foreclosure. Further, one in every 485 housing units, in Erie County, received a foreclosure filing in October 2010.

The unemployment and foreclosure levels in this area were taken into consideration within the lending test.

The following table illustrates the demographics of this assessment area, based on data from the 2000 U.S. Census Bureau report.

⁶ www.lmi.state.oh.us

⁷ www.realtytrac.com

Combined Demographics Report

Citizens Banking Company

Assessment Area(s): MSA 41780

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	4,169	19.0
Moderate-income	5	27.8	4,848	22.1	763	15.7	4,076	18.6
Middle-income	10	55.6	13,817	63.0	460	3.3	5,119	23.3
Upper-income	3	16.7	3,274	14.9	95	2.9	8,575	39.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	18	100.0	21,939	100.0	1,318	6.0	21,939	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	8,914	4,244	18.6	47.6	3,818	42.8	852	9.6
Middle-income	21,033	14,984	65.6	71.2	3,980	18.9	2,069	9.8
Upper-income	5,962	3,626	15.9	60.8	1,075	18.0	1,261	21.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	35,909	22,854	100.0	63.6	8,873	24.7	4,182	11.6
	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	788	24.7	691	24.5	70	27.5	27	23.1
Middle-income	1,894	59.3	1,678	59.4	141	55.3	75	64.1
Upper-income	513	16.1	454	16.1	44	17.3	15	12.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,195	100.0	2,823	100.0	255	100.0	117	100.0
Percentage of Total Businesses:			88.4		8.0		3.7	
	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	0.7	1	0.7	0	0.0	0	0.0
Middle-income	120	87.6	119	87.5	1	100.0	0	0.0
Upper-income	16	11.7	16	11.8	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	137	100.0	136	100.0	1	100.0	0	0.0
Percentage of Total Farms:			99.3		0.7		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

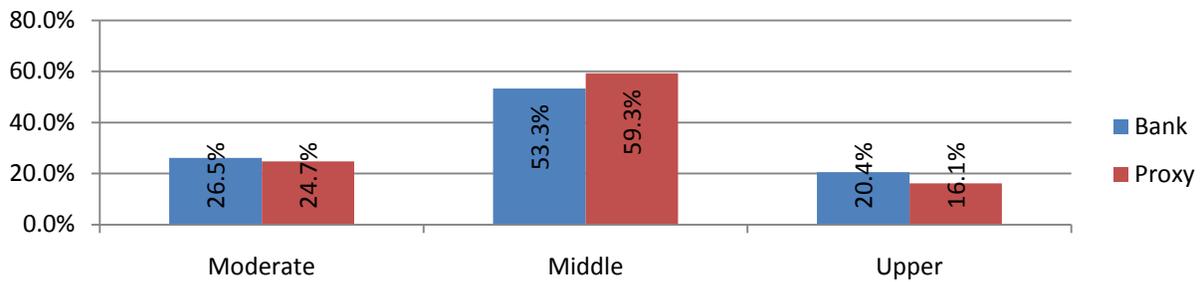
Lending Test

Citizens' performance reflects a good responsiveness to the credit needs of the community, a reasonable geographic distribution of loans in the area, and an adequate distribution among borrowers of different income levels and businesses of different revenue sizes. The bank made one community development loan totaling \$42,000 during the assessment period. The purpose of the loan was to create jobs for low-income individuals.

Geographic Distribution

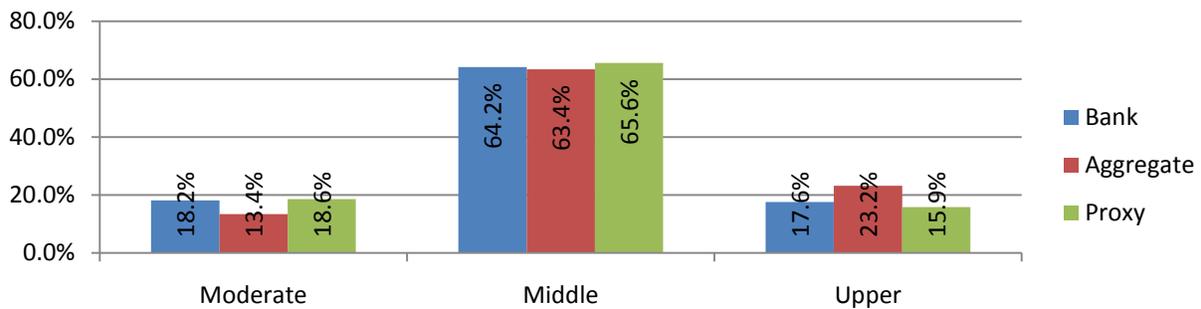
The geographic distribution of loans reflects a reasonable penetration throughout the assessment area. There were no gaps noted in the distribution of loans throughout the assessment area. All census tracts had lending during this evaluation period.

Small Business Lending by Tract



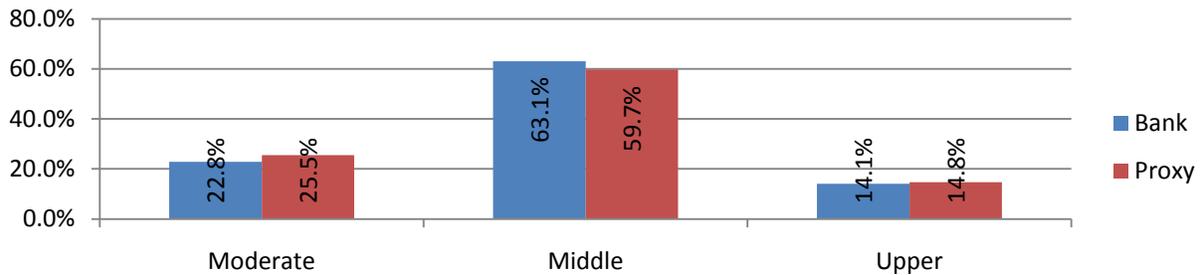
The chart above shows that Citizens originated a higher percentage of small business loans in the moderate-income tracts than the percentage of businesses (proxy) in the moderate-income tracts. This reflects an excellent level of lending in the moderate-income tracts.

HMDA Lending by Tract



The previous chart shows that Citizens originated a higher percentage of HMDA loans in the moderate-income tracts than the aggregate of all lenders and a slightly lower percentage than the percentage of owner-occupied housing units (proxy) in moderate-income tracts. This reflects a good level of lending in the moderate-income tracts.

Consumer Lending by Tract

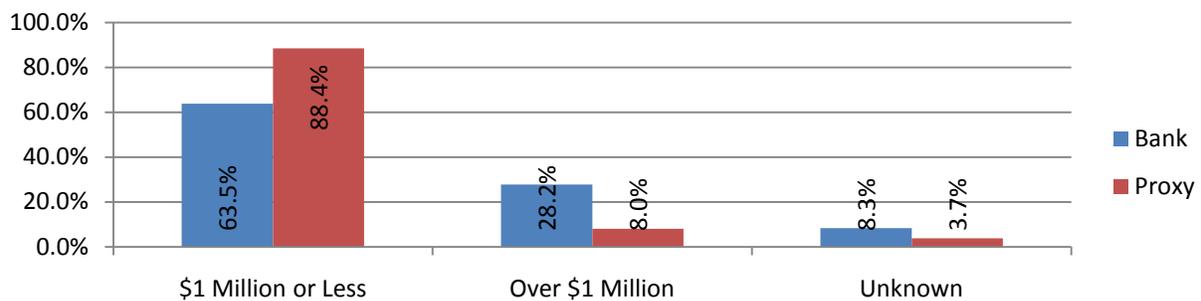


The above chart shows that Citizens originated a slightly lower percentage of consumer loans in the moderate-income tracts than the percentage of households (proxy) in moderate-income tracts. This reflects a good level of lending in the moderate-income tracts.

Borrower Distribution

Lending in this assessment area reflects a reasonable distribution of lending to borrowers of different income levels and to businesses of different revenue sizes.

Lending by Revenue Size



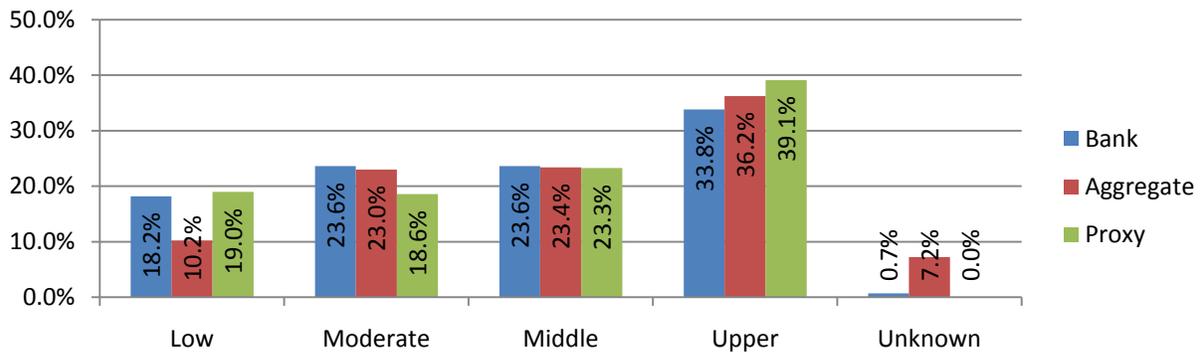
The above chart shows Citizens originated a significantly lower percentage of small business loans than the percentage of businesses with revenues of \$1 million or less (proxy). The most notable difference is in the percentage of loans to businesses with more than \$1 million in revenue. However, based on this analysis, the bank's lending to small businesses with \$1 million or less in revenue is considered adequate.

Percentage of Small Business Loans by Loan Size



The above chart illustrates the distribution of business loans by loan size and indicates that the majority of the bank’s lending is small dollar business loans, less than \$100,000. Business loans with smaller loan amounts are often indicative of the credit needs of small businesses.

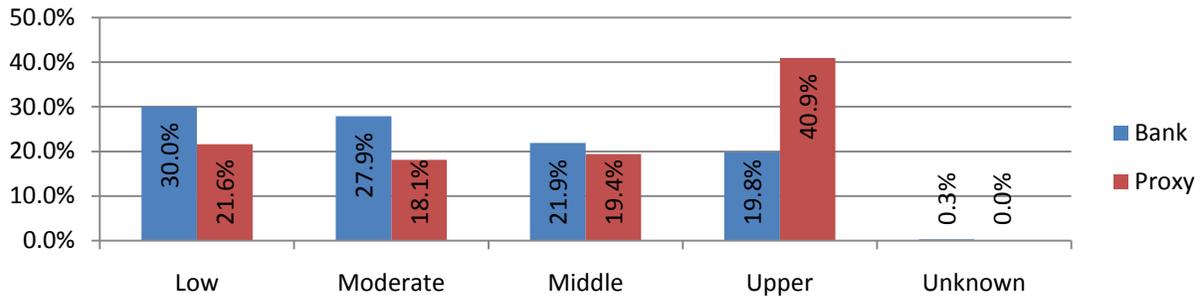
Lending by Family Income



The above chart shows that Citizens originated a substantially higher percentage of HMDA loans to low-income families compared to the aggregate percentage of all lenders. In addition, Citizens originated a slightly lower percentage of HMDA loans to low-income families as compared to the percentage of low-income families in the assessment area (proxy). Based on this analysis, HMDA lending to low-income families is good.

Lending to moderate-income families for HMDA loans were similar to aggregate of all lenders and exceeded the percentage of moderate-income families in the assessment area. HMDA lending to moderate-income families is excellent.

Lending by Household Income



The above chart shows Citizens originated a significantly higher percentage of consumer loans to low- and moderate-income households than the percentage of low- and moderate-income households in the assessment area (proxy). Consumer lending to low- and moderate-income households is excellent.

Community Development Test

Citizens' community development performance in this assessment area demonstrates an adequate responsiveness to the community development needs of this assessment area through community development loans, qualified investments, and community development services considering its capacity and the needs and availability of such opportunities for community development in this assessment area.

Community Development Loans

Citizens demonstrated an adequate responsiveness to community development lending needs in this assessment area. The bank originated one community development loan, which was for the creation of jobs for low-income individuals, totaling \$42,000 during this evaluation period. Most loans originated are considered under the lending test as a small business, HMDA, or consumer loan.

Qualified Investments

Citizens demonstrated a poor responsiveness to community development investment needs. The bank's qualified investments were entirely donations to community development organizations. The bank made seven qualified donations during this evaluation period within this assessment area totaling \$25,834.

Community Development Services

Citizens demonstrated an adequate responsiveness to community development service needs.

The following chart displays the branch distribution by tract income level compared to demographics:

	# of Branches	Percentage of Branches	# of Tracts	Percentage of Tracts	Percentage of Families	Percentage of Households
Moderate-income	1	16.7%	5	27.8%	18.6%	25.5%
Middle-income	4	66.6%	10	55.6%	65.6%	59.7%
Upper-income	1	16.7%	3	16.7%	15.9%	14.8%

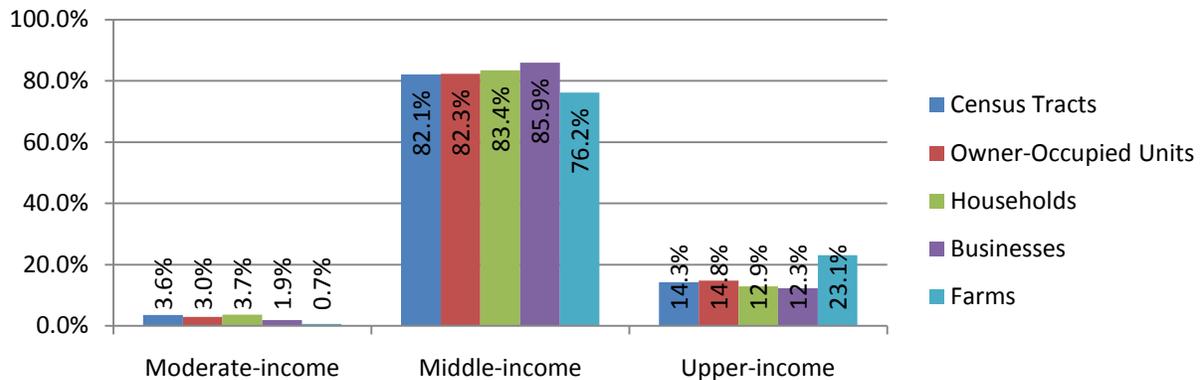
The above table shows that there is a reasonable distribution of branches compared to the assessment area demographics. In addition, the branch in the moderate-income tract is the main office. There are two stand-alone ATMs in the middle-income tracts. Services are also available through online and telephone banking.

The bank's employees provide their financial expertise to local organizations that provide community development and affordable housing services to the community through board and committee memberships. Financial expertise is also provided through financial education programs at local venues such as "Save our Homes," which is foreclosure prevention education.

DESCRIPTION OF NORTH CENTRAL OHIO NONMETROPOLITAN AREA

The Nonmetropolitan Area North Central Ohio consists of the entireties of Huron and Crawford counties and the eastern portion of Seneca County. The assessment area consists of 28 census tracts, of which there is one moderate-income, 23 middle-income, and four upper-income census tracts. The charts below depict the demographic characteristics of this assessment area:

Distribution by Tract Income



All middle-income tracts in Huron and Crawford counties have been designated as distressed areas due to unemployment rates. This represents 21 middle-income tracts or 91.3% of all middle-income tracts in this assessment area, and comprises 75.0% of all tracts in the assessment area.

The table below depicts the 23 financial institutions insured by the FDIC that operate in this assessment area:

Institution Name	Number of Offices	Deposits (\$000)	Market Share
PNC BANK NATIONAL ASSN	8	257,799	10.70%
HOME SAVINGS&LOAN CO	6	213,981	8.88%
OLD FORT BANKING CO	4	204,852	8.50%
SUTTON BANK	4	190,364	7.90%
CITIZENS BANKING CO	8	175,304	7.28%
FIFTH THIRD BANK	3	155,063	6.44%
KEYBANK NATIONAL ASSN	4	150,566	6.25%
PARK NATIONAL BANK	3	143,358	5.95%
FARMERS CITIZENS BANK	2	115,294	4.79%
PEOPLES SAVINGS&LOAN CO	2	109,700	4.55%
FIRSTMERIT BANK NA	5	100,632	4.18%
FIRST FED CMTY BK OF BUCYRUS	4	88,121	3.66%

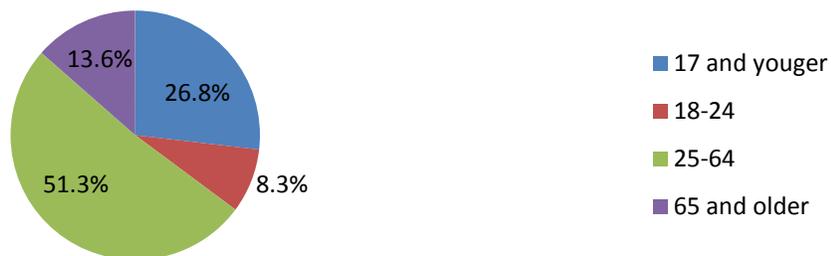
Institution Name	Number of Offices	Deposits (\$000)	Market Share
CROGHAN COLONIAL BANK	3	83,047	3.45%
FIRST FEDERAL BANK OF OHIO	3	80,954	3.36%
FIRST NB OF BELLEVUE	1	62,134	2.58%
FIRST BANK OF OHIO	2	60,211	2.50%
GALION BUILDING&LOAN BANK	2	55,433	2.30%
U S BANK NATIONAL ASSN	2	54,425	2.26%
FIRST FEDERAL BANK OF THE MW	1	31,144	1.29%
REPUBLIC BANKING CO	1	30,112	1.25%
FIRST NB OF SYCAMORE	1	22,584	0.94%
HUNTINGTON NATIONAL BANK	1	22,555	0.94%
WOODFOREST NATIONAL BANK	2	1,593	0.07%
Number of Institutions in the Market: 23	72	2,409,226	100%

Based on the FDIC’s deposit market share report as of June 30, 2010, Citizens ranked fifth with 7.3% of the deposit market share.⁸ In addition, Citizens ranked second (behind PNC Bank) with 11.9% of the deposit market share in Huron and Crawford counties. This data indicates that there is considerable competition for Citizens in this area. Within this assessment area, the bank originated 264 consumer loans, 126 small business loans, 64 HMDA loans and 41 farm loans. The percentage of total lending in this assessment area is 26.4% of the bank’s lending compared to 7.3% of the bank’s share of deposits.

Population

Data released by the U.S. Census Bureau in 2000 indicates the population within the assessment area was 114,925. Details of the population’s age characteristics are illustrated in the chart below.

Population by Age



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

Income Characteristics

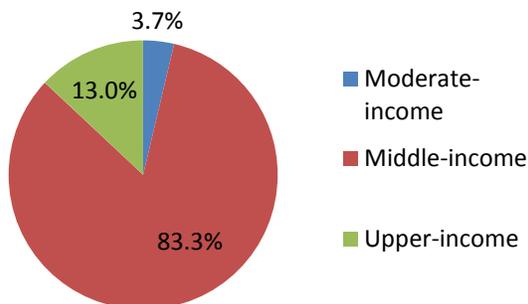
According to the 2000 U.S. Census Bureau report, there were 44,260 households in this assessment area, of which 31,810 (71.9%) were designated as families. Of those families, 15.5% were low-income, 19.4% were moderate-income, 24.8% were middle-income, and 40.3% were upper-income. In the assessment area, 6.9% of the families lived below the poverty level, which was lower than the State of Ohio’s family poverty rate of 7.8%.

The median family income for the assessment area was \$45,299 compared to the State of Ohio at \$50,037. According to Department of Housing & Urban Development (“HUD”), the estimated MFI for 2010 increased to \$53,700.

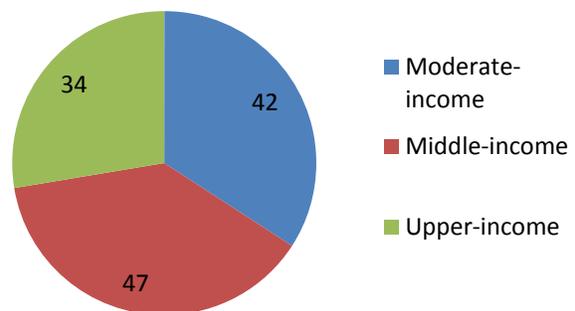
Housing

The Nonmetropolitan North Central Ohio assessment area contains 47,014 housing units, of which 68.9% are owner-occupied, 25.4% are rental, and 5.7% are vacant. Single-family units comprise 75.6% of the housing units, while two-to-four family units comprise 11.1%, multi-family units comprise 6.2%, and mobile homes comprise 7.2%. The median age of the housing stock within the assessment area is 45 years old. The following graphs depict the geographic distribution of housing units and the median age of housing units by tract income in this assessment area:

Distribution of Housing Units



Median Age of Housing Stock



The median housing value for this assessment area is \$86,519. The following graph depicts the median housing value by tract income:

Median Housing Value



However, 76.9% of the owner-occupied units within the assessment area are valued at \$60,000 or more, with 14.2% valued at \$150,000 or more. This is slightly lower than the State of Ohio, in which 82.8% of the owner-occupied units are valued at \$60,000 or more. This is significantly lower than the State of Ohio with 24.0% valued at \$150,000 or more.

Based on the median family income, over half of the homes in the assessment area are considered affordable for low-income individuals and approximately 86.0% are considered affordable for moderate-income individuals, when using a mortgage payment equal to 30.0% of gross income.

Labor, Employment, and Economics

The following table illustrates land use in each county in the assessment area⁹:

	Urban	Cropland	Pasture	Forest
Crawford County	4.8%	79.5%	3.8%	10.7%
Huron County	3.9%	70.8%	8.1%	16.3%
Seneca County	5.0%	79.4%	4.3%	10.2%

With the majority of land used for farming and additional land covered by forest, land available for business use and residential properties is limited.

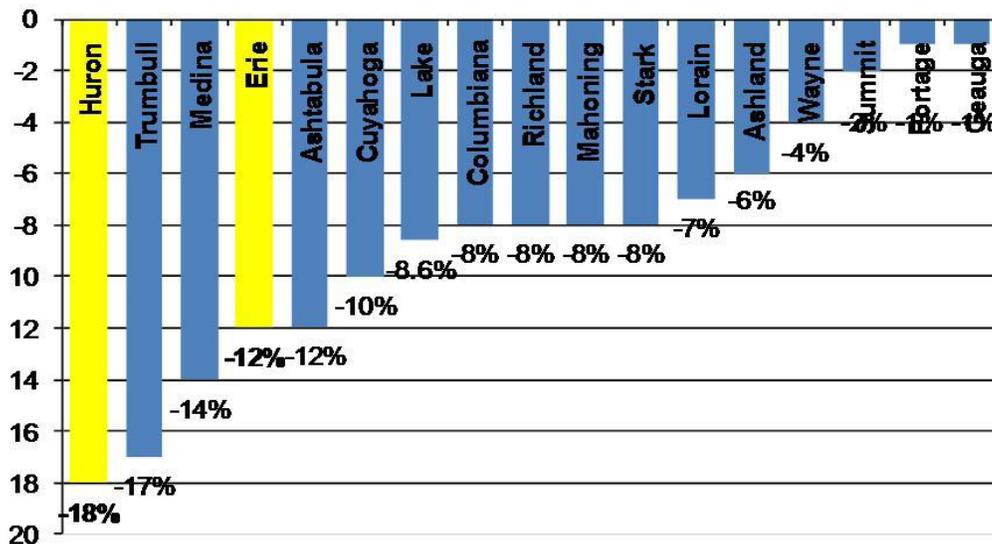
⁹ www.development.ohio.gov/research

The assessment area had 3,494 small businesses and 694 small farms according to the 2008 Dun & Bradstreet data. The top six industries include agricultural (15.1%); other services (14.3%); retail trade (10.9%); construction (10.1%); health care and social assistance (6.2%); and professional, scientific, and technical services (6.2%). The majority of businesses (88.7%) have revenues of less than \$1 million annually. Most businesses (80.5%) have been in business for more than ten years and 44.3% of those businesses have been in existence for more than 25 years.

A community contact involved in providing community development services to low- and moderate-income individuals stated that Huron County continues to struggle with unemployment and poverty levels. The following chart displays the employment decrease by county in the State of Ohio:

Per Cent Total Employment Decrease By County from 2000-2007.
Reference: The 2009-2010 PCSAO Factbook, 9th Edition.

Data Analysis: Office of Research & Development



The chart shows that Huron County has suffered the greatest decrease in employment in the State of Ohio.

The contact also stated that there is a high need for services targeted to low- and moderate-income individuals. The contact stated that local residents have need for the following services (in order of priority):

- Assistance with rent payments, mortgage payments, and energy bills
- Medical bills
- Food stamps
- Job search assistance
- Transportation to work
- Debt collection services

In addition, the contact stated that there is a great need for financial education in the area.

The following tables identify major employers for the assessment area:

Crawford County:

Business Name	Industry
Bucyrus Precision Tech Inc	Manufacturing
Crawford County Government	Government
Galion City Schools	Government
Galion Community Hospital	Services
General Electric Co	Manufacturing
Imasen Bucyrus Technology Inc	Manufacturing
PPG Industries Inc	Manufacturing
Timken Co	Manufacturing

Huron County:

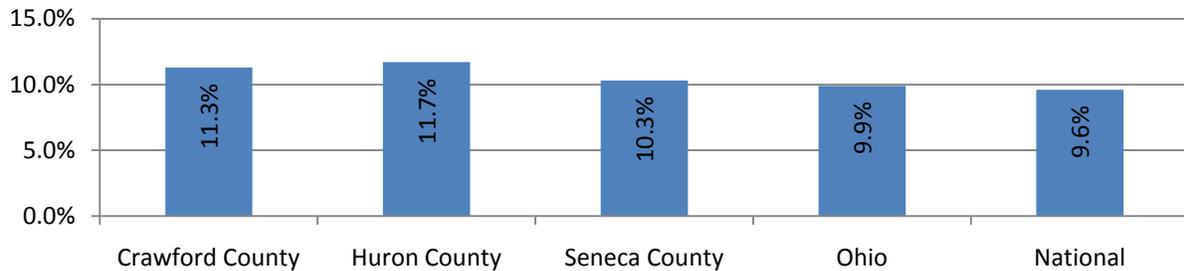
Business Name	Industry
Berry Plastics/Venture Packaging	Manufacturing
Campbell Soup Co/Pepperidge Farm	Manufacturing
Fisher-Titus Medical Center	Services
Huron County Government	Government
MTD Products/Midwest Inds	Manufacturing
Norwalk City Schools	Government
R Donnelley & Sons Co	Manufacturing

Seneca County:

Business Name	Industry
Dorel Industries/Ameriwood Ind	Manufacturing
Fostoria City Schools	Government
Heidleberg College	Services
Mercy Hospital of Tiffin	Services
State of Ohio	Government
Tiffin City Schools	Government
Tiffin University	Services
Trane U.S. Inc	Manufacturing

The following chart shows unemployment rates for October 2010 for Crawford, Huron, and Seneca counties compared to the State of Ohio and national averages:

Unemployment Rates October 2010



The chart shows that all three counties have higher unemployment rates than the State of Ohio and the national average. The high unemployment rates in this area have contributed to a significant amount of foreclosures. Data from realtytrac.com indicates that there are currently 93,571 homes in foreclosure in Ohio. This data revealed the following information about the counties in this assessment area:

- Crawford County – As of October 2010, there were 66 homes in foreclosure and one in every 317 homes received foreclosure filings.
- Huron County – As of October 2010, there were 527 homes in foreclosure and one in every 355 housing units received foreclosure filings.
- Seneca County – As of October 2010, there were 57 homes in foreclosure and one in every 442 homes received foreclosure filings.

The high unemployment and foreclosure levels in this area were taken into consideration within the lending test.

The following table illustrates the demographics of this assessment area, based on data from the 2000 U.S. Census Bureau report:

Combined Demographics Report

Citizens Banking Company

Assessment Area(s): North Central NonMSA OH

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	4,938	15.5
Moderate-income	1	3.6	1,062	3.3	179	16.9	6,168	19.4
Middle-income	23	82.1	26,286	82.6	1,821	6.9	7,901	24.8
Upper-income	4	14.3	4,462	14.0	199	4.5	12,803	40.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	28	100.0	31,810	100.0	2,199	6.9	31,810	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	1,725	956	3.0	55.4	674	39.1	95	5.5
Middle-income	39,177	26,658	82.3	68.0	10,286	26.3	2,233	5.7
Upper-income	6,112	4,786	14.8	78.3	967	15.8	359	5.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	47,014	32,400	100.0	68.9	11,927	25.4	2,687	5.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	74	1.9	62	1.8	11	3.5	1	0.7
Middle-income	3,398	86.3	3,003	85.9	275	88.7	120	89.6
Upper-income	466	11.8	429	12.3	24	7.7	13	9.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,938	100.0	3,494	100.0	310	100.0	134	100.0
Percentage of Total Businesses:				88.7		7.9		3.4
	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	5	0.7	5	0.7	0	0.0	0	0.0
Middle-income	535	76.2	528	76.1	7	87.5	0	0.0
Upper-income	162	23.1	161	23.2	1	12.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	702	100.0	694	100.0	8	100.0	0	0.0
Percentage of Total Farms:				98.9		1.1		0.0

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

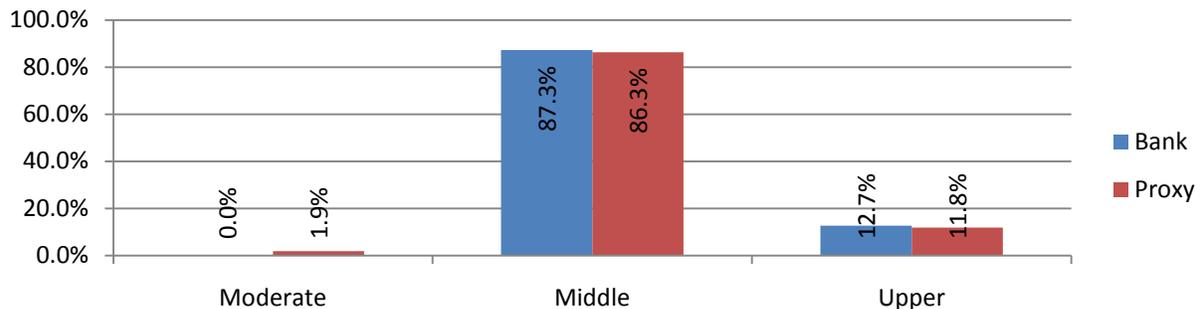
Citizens' performance reflects an adequate responsiveness to the credit needs of the community, a reasonable geographic distribution of loans in the area, and an adequate distribution among borrowers of different income levels and businesses of different revenue sizes. The bank made one community development loan, totaling \$1 million, which is considered an excellent level of community development lending.

Geographic Distribution

The geographic distribution of loans reflects a reasonable penetration throughout the assessment area. There were four census tracts in Crawford County (one moderate-income, two middle-income, and one upper-income) where no loans were extended during the evaluation period. The four census tracts are in areas that are approximately 10-14 miles away from the bank's branches. This distance could pose challenges for the bank to reach customers in these areas. The Crestline branch, located in a middle-income tract was closed since the previous examination. The presence of FirstMerit Bank and Park National Bank created significant competition for Citizens in this area and decreased the bank's opportunities to attract borrowers.

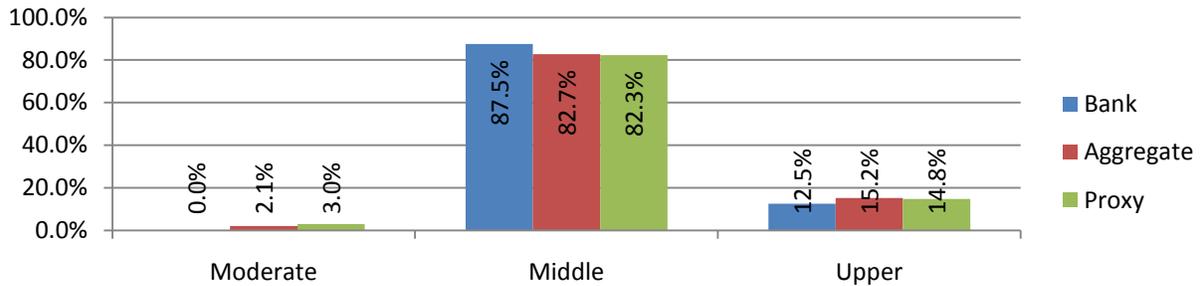
Citizens originated loans in 19 (90.5%) of the 21 distressed middle-income tracts. This indicates that the bank is making efforts to penetrate the entire assessment area.

Small Business Lending by Tract



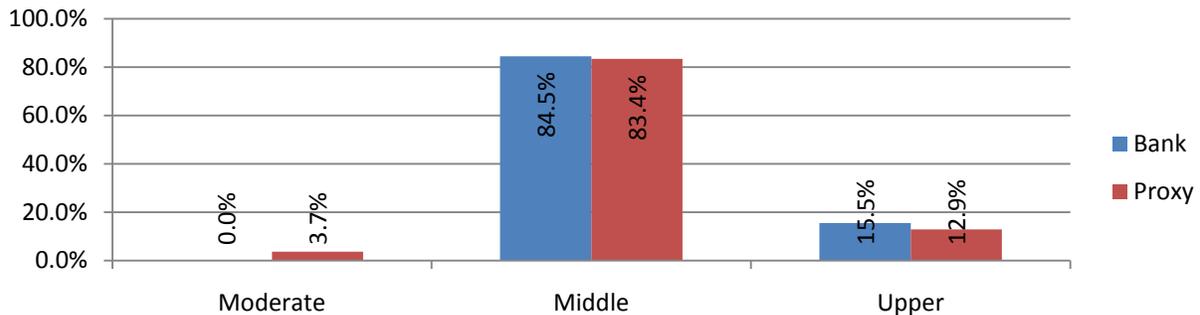
The above chart shows that Citizens originated no small business loans in the moderate-income tract, which reflects a poor level of lending compared to the percentage of businesses in the moderate-income tract. Citizens originated a slightly higher percentage of small business loans in middle-income tracts compared to proxy. This reflects a good level of small business lending considering the large percentage of distressed middle-income tracts in this assessment area.

HMDA Lending by Tract



The chart shows that Citizens did not originate HMDA loans in the moderate-income tract. The aggregate of all lenders had a slightly lower percentage than the percentage of owner-occupied housing units in the moderate-income tract. This reflects a poor level of lending in the moderate-income tract. Conversely, Citizens originated a higher percentage of HMDA loans than aggregate and proxy in middle-income tracts. This reflects an excellent level of lending given the high percentage of distressed middle-income tracts in the area.

Consumer Lending by Tract

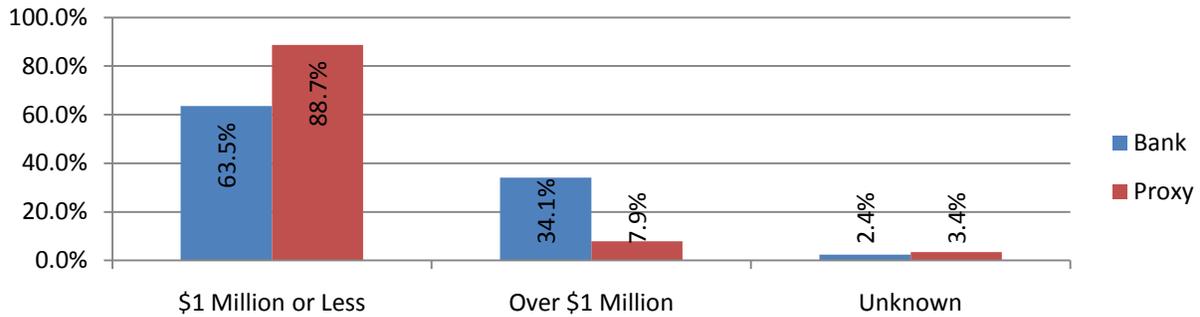


The above chart shows that Citizens originated no consumer loans in the moderate-income tract and compared to the percentage of households in moderate-income tracts, this reflects a poor level of lending in the moderate-income tract. Conversely, Citizens originated a higher percentage of consumer loans than proxy in middle-income tracts. This reflects an excellent level of lending, given the high percentage of distressed middle-income tracts in the area.

Borrower Distribution

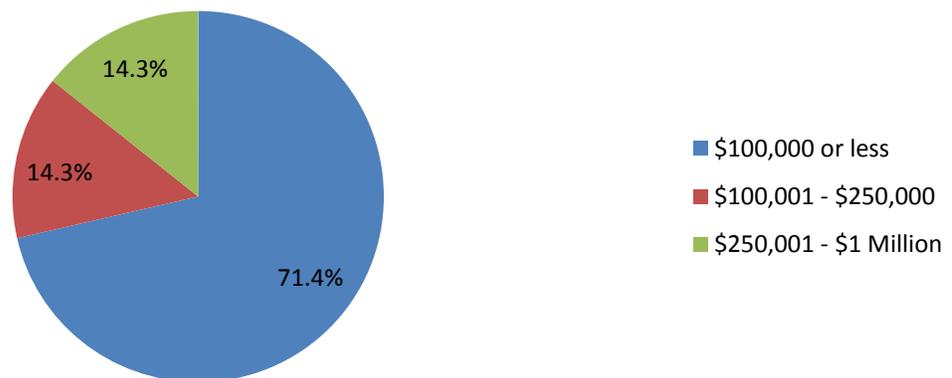
Lending in this assessment area reflects a reasonable distribution of lending to borrowers of different incomes and to businesses of different revenue size.

Lending by Revenue Size



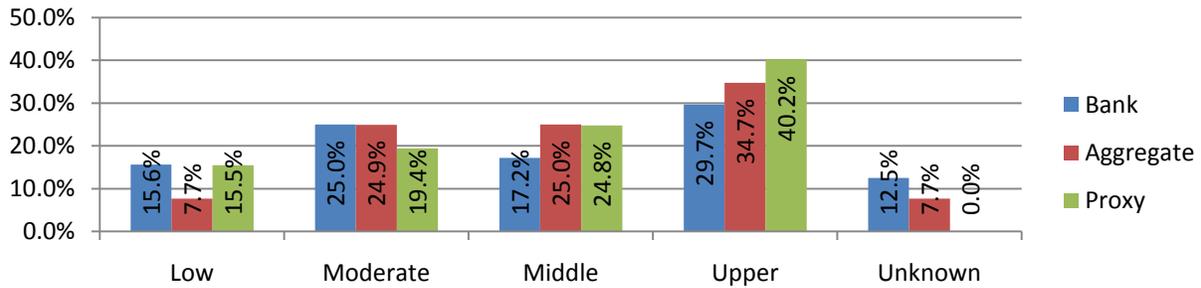
The above chart shows Citizens originated a significantly lower percentage of small business loans than the percentage of businesses with revenues of \$1 million or less. The most notable difference is in the percentage of loans to businesses with more than \$1 million in revenue. Lending to small businesses with \$1 million or less in revenue is adequate.

Percentage of Small Business Loans by Loan Size



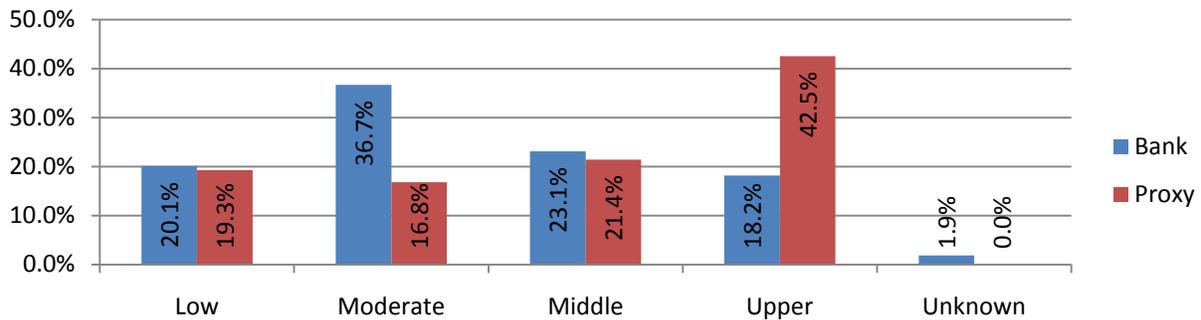
The above chart illustrates the distribution of business loans by loan size and reflects that the majority of the bank’s business lending is for small dollar amounts. Smaller amount loans are often indicative of small business credit needs

Lending by Family Income



The above chart shows that Citizens originated a substantially higher percentage of HMDA loans to low-income families as compared to the percentage of all aggregate lenders. In addition, Citizens originated a slightly higher percentage of HMDA loans to low-income families as compared to the percentage of low-income families in the assessment area (proxy). HMDA lending to low-income families is excellent. Lending to moderate-income families for HMDA loans were similar to aggregate and exceeded the percentage of moderate-income families in the assessment area. HMDA lending to moderate-income families is excellent.

Lending by Household Income



The above chart shows Citizens originated a slightly higher percentage of consumer loans to low-income households than the percentage of low-income households in the assessment area (proxy). This reflects a good level of lending to low-income households. Citizens originated a significantly higher percentage of consumer loans compared to proxy and this reflects an excellent level of consumer lending to moderate-income households.

Community Development Test

Citizens’ community development performance in this assessment area demonstrates an adequate responsiveness to the community development needs of this assessment area through community development loans, qualified investments, and community development services considering its capacity and the needs and availability of such opportunities for community development in this assessment area.

Community Development Loans

Citizens has demonstrated an excellent responsiveness to community development lending needs in this assessment area. The bank originated one community development loan totaling \$1,000,000 for affordable housing during this evaluation period. Most loans originated are considered under the lending test as a small business, HMDA, or consumer loans.

Qualified Investments

Citizens has demonstrated an adequate responsiveness to community development investment needs. The bank’s qualified investments were entirely donations to community development organizations. The bank made five qualified donations during this evaluation period within this assessment area totaling \$40,625. The donations were made to organizations that used the funds to improve downtown areas, small business creation and retention, or services to low- and moderate-income individuals.

Community Development Services

Citizens has demonstrated an adequate responsiveness to community development service needs.

The following chart displays the branch distribution by tract income level compared to demographics:

	# of Branches	Percentage of Branches	# of Tracts	Percentage of Tracts	Percentage of Families	Percentage of Households
Moderate-income	0	0%	1	3.6%	3.3%	3.7%
Middle-income	8	100%	23	82.1%	82.6%	83.4%
Upper-income	0	0%	4	14.3%	14.0%	12.9%

The chart indicates that there is a reasonable distribution of branches compared to the assessment area demographics. All eight branches are located in middle-income tracts that are designated as distressed. In addition, there is one cash-dispensing ATM located in a middle-income tract that is designated as distressed. Services are also available through online and telephone banking.

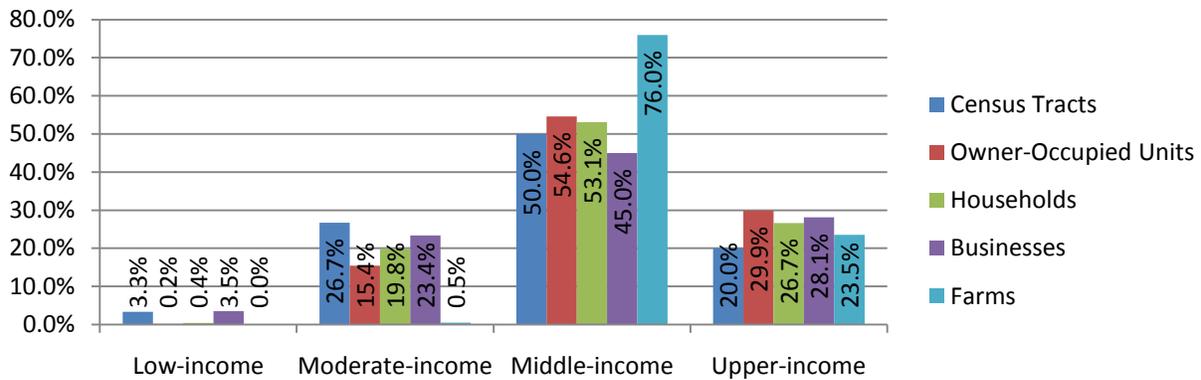
The bank's employees provide their financial expertise to local organizations that provide community and economic development through board and committee memberships. A majority of these organizations focus on generating and retaining small businesses. Below is a list of organizations and services provided in this assessment area.

NAME OF ORGANIZATION	SERVICES PROVIDED
Norwalk Economic Development	Member was a financial advisor for the organization.
Main Street Norwalk	Member served on the economic restructuring committee.
New Washington Development Corporation	Member provided financial advice as Treasurer.
Willard Chamber of Commerce	Member provided financial advice as Treasurer.
Willard Area Economic Development Committee	Member provided financial advice as Treasurer.

DESCRIPTION OF MANSFIELD, OHIO MSA 31900

The Mansfield, Ohio MSA consists entirely of census tracts in Richland County. Specifically, this assessment area contains 30 of the 32 census tracts in Richland County. The 30 tracts are comprised of one low-income, eight moderate-income, 15 middle-income, and six upper-income census tracts. The charts below depict the demographic distribution for this assessment area:

Distribution by Tract Income



The table below depicts the 14 financial institutions, insured by the FDIC, that operate in this assessment area:

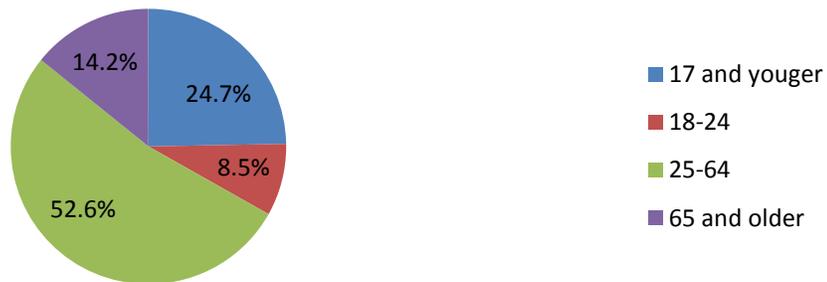
Institution Name	Number of Offices	Deposits (\$000)	Market Share
PARK NATIONAL BANK	13	453,402	27.44%
MECHANICS SAVINGS BANK	6	323,420	19.58%
KEYBANK NATIONAL ASSN	6	224,056	13.56%
JPMORGAN CHASE BANK NA	4	147,134	8.91%
CITIZENS BANKING CO	4	112,279	6.80%
FIRSTMERIT BANK NA	4	111,097	6.72%
FIRST FEDERAL BANK OF OHIO	3	66,167	4.01%
HUNTINGTON NATIONAL BANK	1	59,240	3.59%
U S BANK NATIONAL ASSN	3	43,297	2.62%
HOME SAVINGS&LOAN CO	1	39,433	2.39%
PNC BANK NATIONAL ASSN	1	34,402	2.08%
SUTTON BANK	2	29,547	1.79%
FARMERS CITIZENS BANK	1	8,013	0.49%
WOODFOREST NATIONAL BANK	1	561	0.03%
Number of Institutions in the Market: 14	50	1,652,048	100%

Based on the FDIC's deposit market share report, as of June 30, 2010, Citizens ranked fifth with 6.8% of the deposit market share.¹⁰ This information indicates that there is significant banking competition in this assessment area. Within this assessment area, the bank originated 129 consumer loans, 109 small business loans, 48 HMDA loans and 43 farm loans. The percentage of total lending in this assessment area is 17.5% of the bank's lending compared to 6.8% of the bank's share of deposits.

Population

The 2000 data released by the U.S. Census Bureau indicates that the population within this assessment area was 120,185. The population by age was distributed as follows:

Population by Age



Income Characteristics

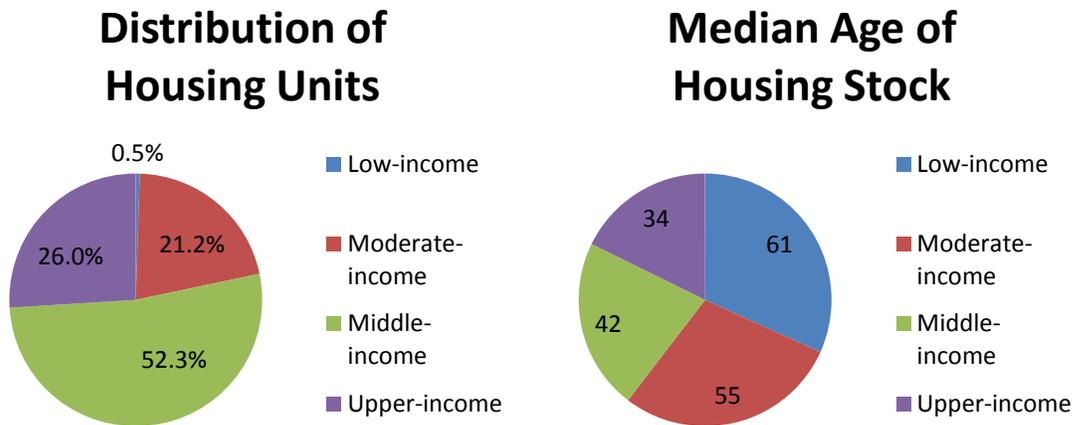
According to the 2000 U.S. Census Bureau report, there were 46,273 households in this area, of which 31,863 (68.9%) were designated as families. Of those families, 17.9% were low-income, 19.5% were moderate-income, 23.5% were middle-income, and 39.1% were upper-income. Further, in this assessment area, 8.4% of the families lived below the poverty level, which was slightly higher than the State of Ohio's poverty level of at 7.8%.

The median family income for the assessment area was \$44,870, compared to the State of Ohio at \$50,037. According to HUD, the estimated MFI for 2010 increased to \$55,100.

¹⁰ <http://www2.fdic.gov/sod/index.asp>

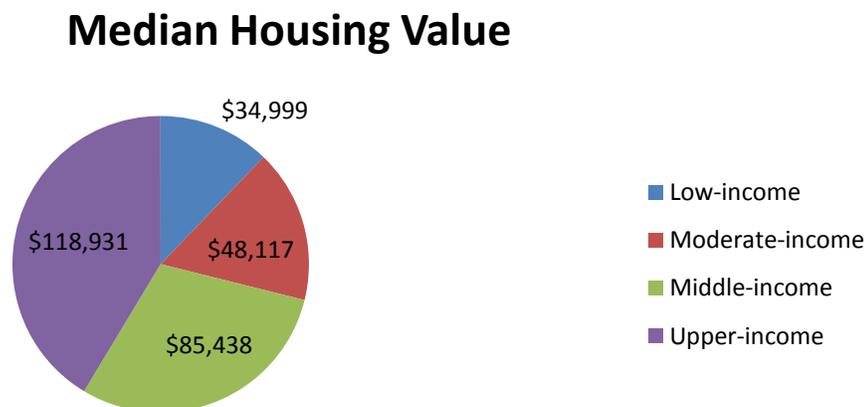
Housing

There are 49,594 housing units in this assessment area, of which 66.0% are owner-occupied, 27.3% are rental units, and 6.7% are vacant properties. Single-family units comprise 75.1% of the housing units, while two-to-four family units comprise 11.4%, multi-family units comprise 9.4%, and mobile homes comprise 4.1%. The median age of the housing stock within the assessment area is 42 years old. The following graphs depict the geographic distribution of housing units and the median age of housing by tract income in this assessment area:



The median housing value for this assessment area was \$87,310. Specifically, 76.6% of the owner-occupied units within the assessment area were valued at \$60,000 or more and 14.5% of owner-occupied units were valued at \$150,000 or more. This is slightly lower than the State of Ohio, in which 82.8% of the owner-occupied units were valued at \$60,000 or more and significantly lower than the state of Ohio with 24% valued at \$150,000 or more.

The following graph depicts the median housing values by tract income:



Based on the median family income, over half of the homes in the assessment area are affordable for low-income individuals and approximately 86.0% of the homes are affordable for moderate-income individuals when using a mortgage payment equal to 30.0% of gross income.

Labor, Employment, and Economics

The following table illustrates land use in Richland County:

Urban	Cropland	Pasture	Forest	Wetlands
11.5%	40.4%	6.4%	39.0%	2.3%

With the majority of land being used for farming and additional land being covered by forest, the availability of land for business uses and residential properties is limited.

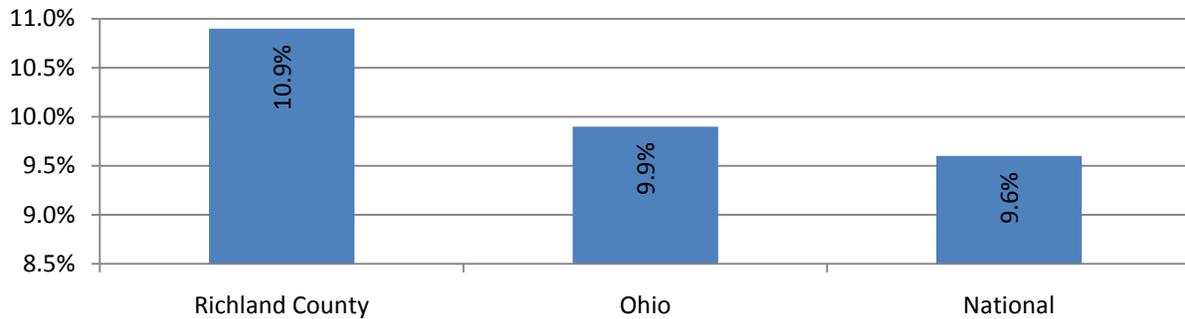
The assessment area had 3,683 small businesses and 203 small farms according to the 2008 Dun & Bradstreet data. The top five industries include other services (16.4%); retail trade (12.8%); construction (11.2%), health care and social assistance (8.8%); and professional, scientific, and technical services (8.5%). The majority of businesses (88.3%) have revenues of less than \$1 million annually. Most businesses (76.3%) have been in existence for more than ten years, and 36.2% of those businesses have been in existence over 25 years.

The following table identifies major employers in Richland County:

Business Name	Industry
AK Steel Holding Corp	Manufacturing
ArcelorMittal/Dofasco Tubular	Manufacturing
Embarq Corp	Utility
Emerson Electric Co/Therm-O-Disc	Manufacturing
Gorman-Rupp Co	Manufacturing
Jay Industries	Manufacturing
Mansfield City Schools	Government
MedCentral Health System	Services
Richland County Government	Government
Sankei Giken/Newman Technology	Manufacturing
State of Ohio	Government
Stoneridge Inc	Manufacturing

The following chart shows unemployment rates for October 2010 for Richland County compared to the State of Ohio and national averages:

Unemployment Rates October 2010



The above chart shows that Richland County has a higher unemployment rate than both the State of Ohio and the national average. A community contact involved in revitalization and stabilization in downtown Mansfield stated that Mansfield took a major economic hit when General Motors (GM) shut down their plant in Ontario, Ohio last year. Ontario is located in Richland County and employed people from other surrounding cities through the GM plant. The contact also stated that businesses are continually downsizing, which further contributes to the high unemployment rate that resulted in record high levels of foreclosures in this area.

Data provided by realtytrac.com indicates that in October 2010, there were 1,224 foreclosed homes in Richland County and one in every 267 housing units received foreclosure filings during this time.

Unemployment and foreclosure levels in Richland County were considered in the bank's lending performance in this area.

The following table illustrates the demographics of this assessment area, based on data from the 2000 U.S. Census Bureau report.

Combined Demographics Report

Citizens Banking Company

Assessment Area(s): MSA 31900

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.3	82	0.3	7	8.5	5,702	17.9
Moderate-income	8	26.7	5,686	17.8	1,178	20.7	6,203	19.5
Middle-income	15	50.0	16,934	53.1	1,196	7.1	7,490	23.5
Upper-income	6	20.0	9,161	28.8	284	3.1	12,468	39.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	30	100.0	31,863	100.0	2,665	8.4	31,863	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	225	58	0.2	25.8	121	53.8	46	20.4
Moderate-income	10,512	5,023	15.4	47.8	4,158	39.6	1,331	12.7
Middle-income	25,934	17,854	54.6	68.8	6,702	25.8	1,378	5.3
Upper-income	12,923	9,777	29.9	75.7	2,554	19.8	592	4.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	49,594	32,712	100.0	66.0	13,535	27.3	3,347	6.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	143	3.5	115	3.1	24	7.5	4	3.6
Moderate-income	964	23.4	865	23.5	78	24.4	21	18.9
Middle-income	1,850	45.0	1,643	44.6	150	46.9	57	51.4
Upper-income	1,157	28.1	1,060	28.8	68	21.3	29	26.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,114	100.0	3,683	100.0	320	100.0	111	100.0
Percentage of Total Businesses:			89.5		7.8		2.7	
	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	0.5	1	0.5	0	0.0	0	0.0
Middle-income	155	76.0	155	76.4	0	0.0	0	0.0
Upper-income	48	23.5	47	23.2	1	100.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	204	100.0	203	100.0	1	100.0	0	0.0
Percentage of Total Farms:			99.5		0.5		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

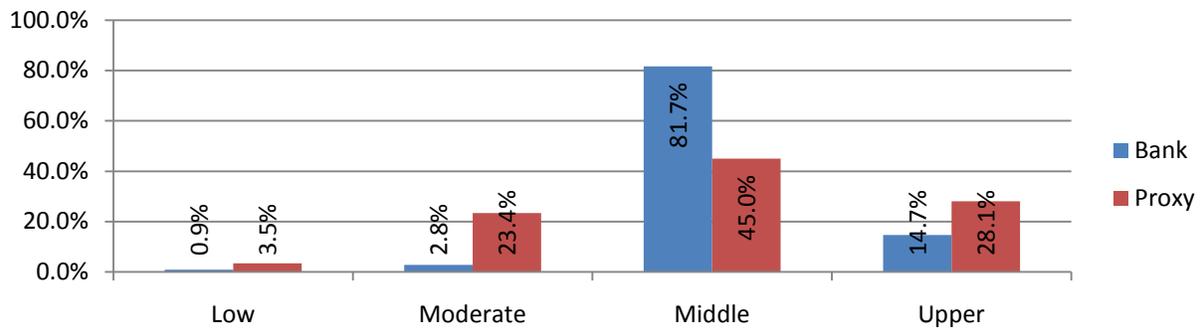
Lending Test

Citizens' performance reflects a poor responsiveness to the credit needs of the community, a poor geographic distribution of loans in the area, and an adequate distribution among borrowers of different income levels and businesses of different revenue sizes.

Geographic Distribution

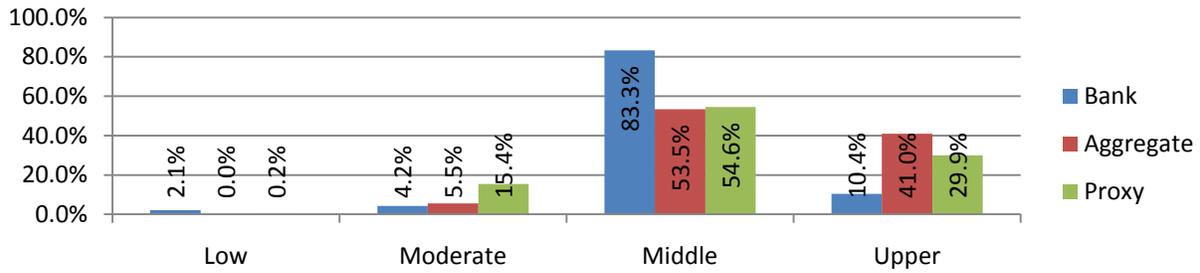
The bank's geographic distribution of lending reflects a poor penetration throughout the assessment area. There were gaps noted in the distribution of loans, as the bank originated no loans in three (two moderate-income and one upper-income) census tracts in this area during this review period. There are no apparent geographic limitations that inhibit the bank's ability to reach all sectors of the assessment area.

Small Business Lending by Tract



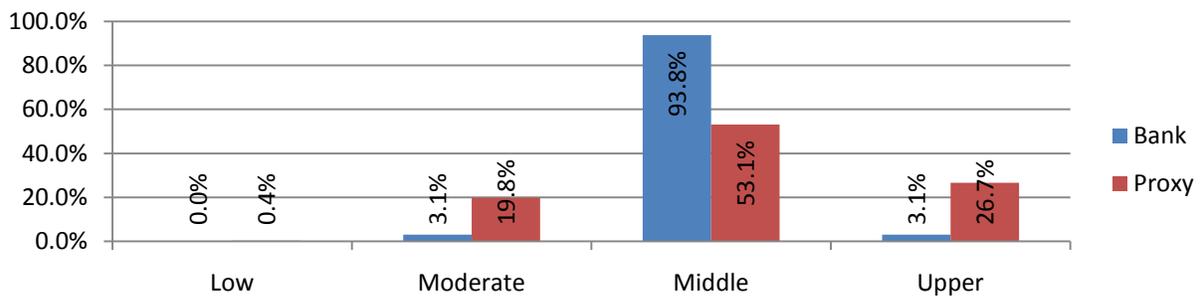
The above chart shows that Citizens originated a significantly lower percentage of small business loans in the low- and moderate-income tracts than the percentage of businesses in the low- and moderate-income tracts. This reflects a poor level of lending in the low- and moderate-income tracts.

HMDA Lending by Tract



The above chart shows that Citizens originated a higher percentage of HMDA loans in the low-income tract than the aggregate of all lenders and the percentage of owner-occupied housing units (proxy) in the low-income tract. This reflects an excellent level of lending in the low-income tract. Conversely, Citizens originated a slightly lower percentage of HMDA loans in the moderate-income tracts than the aggregate and significantly lower percentage than the percentage of owner-occupied housing units in moderate-income tracts. This reflects a poor level of lending in moderate-income tracts.

Consumer Lending by Tract

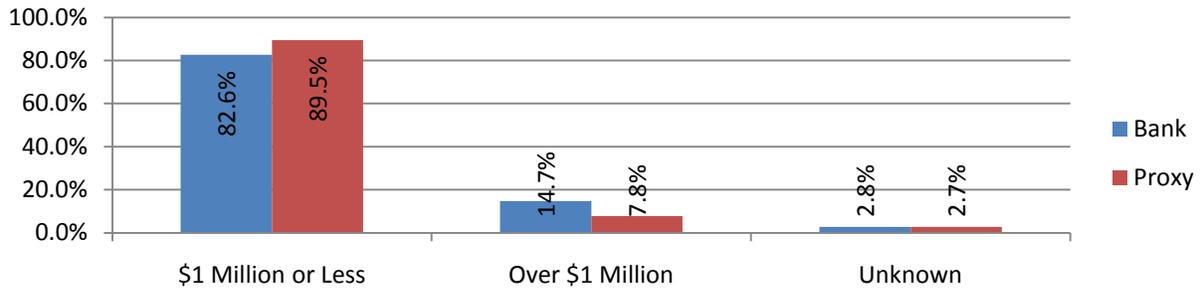


The above chart shows that Citizens did not originate any consumer loans in the low-income census tract; however, there are limited opportunities to lend due to the low number of households in the low-income census tract. Citizens originated a significantly lower percentage of consumer loans in the moderate-income tracts than the percentage of households in moderate-income tracts. This reflects a poor level of lending in the moderate-income tracts.

Borrower Distribution

Lending in this assessment area reflects a reasonable distribution of lending to borrowers of different income levels and to businesses of different revenue sizes.

Lending by Revenue Size



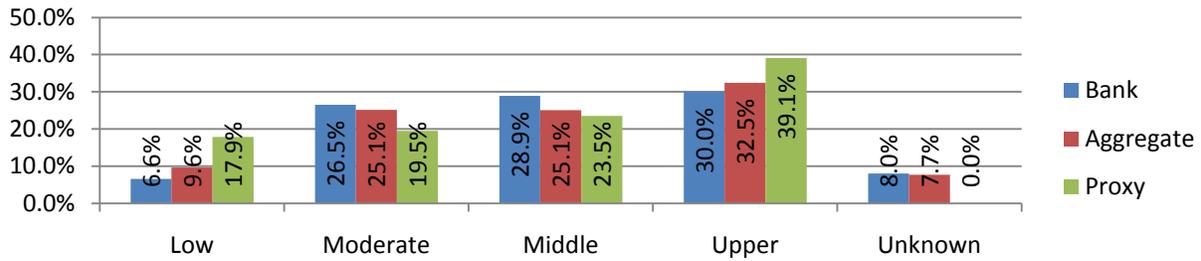
The above chart shows that Citizens originated a slightly lower percentage of small business loans than the percentage of businesses with revenues of \$1 million or less. The most notable difference is in the percentage of loans to businesses with more than \$1 million in revenues. Lending to small businesses with \$1 million or less in revenues is good.

Percentage of Small Business Loans by Loan Size



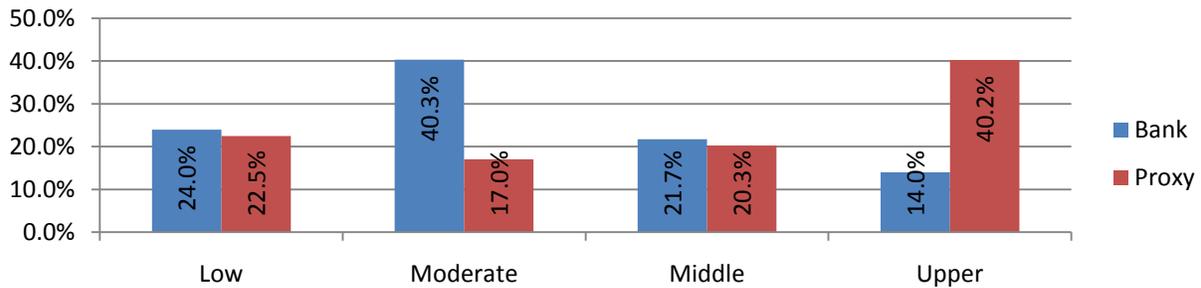
The above chart illustrates the distribution of business loans by loan size and reflects that the majority of the bank’s business lending is for small dollar business loans. Smaller amount business loans are often indicative of the credit needs of small businesses. This further supports that Citizens is appropriately meeting the needs of small businesses.

Lending by Family Income



The above chart shows that Citizens originated a slightly lower percentage of HMDA loans to low-income families compared to the aggregate percentage of all lenders. In addition, Citizens originated a significantly lower percentage of HMDA loans to low-income families compared to the percentage of low-income families in the assessment area. HMDA lending to low-income families is poor. Citizens originated a higher percentage of HMDA loans to moderate-income families in comparison to aggregate and the percentage of moderate-income families in the assessment area. HMDA lending to moderate-income families is excellent.

Lending by Household Income



The above chart shows that Citizens originated a slightly higher percentage of consumer loans to low-income households than the percentage of low-income households in the assessment area. Consumer lending to low-income households is excellent. Citizens originated a significantly higher percentage of consumer loans to moderate-income households than the percentage of moderate-income households in the assessment area. Consumer lending to moderate-income households is excellent.

Community Development Test

Citizens’ community development performance in this assessment area demonstrates poor responsiveness to the community development needs, considering its capacity and the needs and availability of such opportunities for community development in this area. A community contact involved in revitalization and stabilization in downtown Mansfield stated that there is a need for funding of vital projects to revitalize the community; however, they have not received support from local financial institutions.

Community Development Loans

The bank did not provide any community development loans for consideration. All loans extended in this assessment area were considered under the lending test.

Qualified Investments

Citizens has demonstrated a poor responsiveness to community development investment needs. The bank’s qualified investments were entirely donations to community development organizations. The bank made one qualified donation during this evaluation period within this assessment area totaling \$100. The donation was made to an organization that focuses on economic development through retention and expansion of small businesses.

Community Development Services

Citizens’ has demonstrated a poor responsiveness to community development service needs.

The following chart displays the branch distribution by tract income levels, compared to demographics:

	# of Branches	Percentage of Branches	# of Tracts	Percentage of Tracts	Percentage of Families	Percentage of Households
Low-income	0	0%	1	3.3%	0.3%	0.4%
Moderate-income	0	0%	8	26.7%	17.8%	19.8%
Middle-income	4	100%	15	50.0%	53.1%	53.1%
Upper-income	0	0%	6	20.0%	28.8%	26.7%

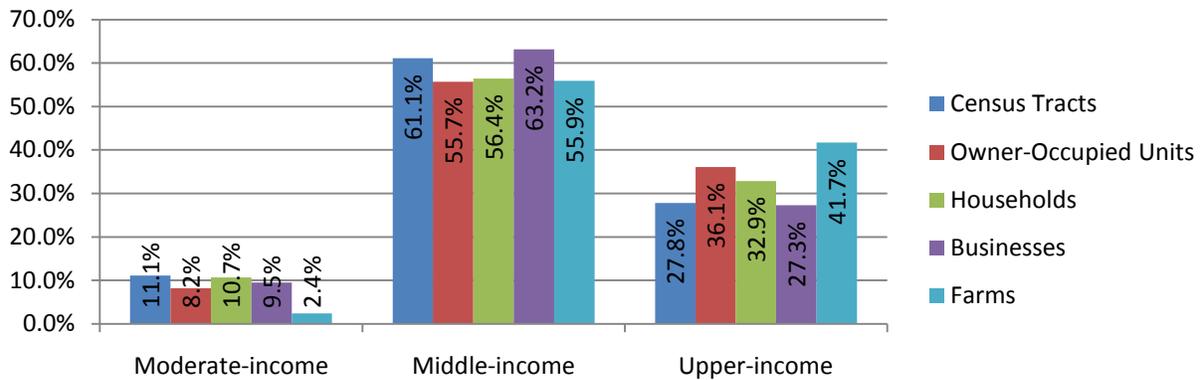
The above chart shows that the distribution of branches does not reflect geographic demographics of the assessment area. In addition to the four branches, there is one stand-alone ATM located in a middle-income tract. Banking services are also available through online and telephone banking.

A Citizens’ employee provided financial counseling for low- and moderate-income individuals through the Catholic Charities Financial Counseling program.

DESCRIPTION OF WEST CENTRAL OHIO NONMETROPOLITAN AREA

The Nonmetropolitan West Central Area consists of the entireties of Champaign and Logan counties. The assessment area is comprised of 18 census tracts; of which, there are two moderate-income, 11 middle-income, and five upper-income census tracts. The charts below depict the demographic distribution for this assessment area:

Distribution by Tract Income



The table below depicts the 17 financial institutions insured by the FDIC that operate in this assessment area:

Institution Name	Number of Offices	Deposits (\$000)	Market Share
PERPETUAL FSB	1	264,126	22.90%
CITIZENS BANKING CO	4	143,749	12.46%
HUNTINGTON NATIONAL BANK	3	130,300	11.29%
CITIZENS FS&LA BELLEFONTAINE	1	125,517	10.88%
PARK NATIONAL BANK	4	98,585	8.55%
PEOPLES SAVINGS BANK	2	70,622	6.12%
FIRST CENTRAL NB OF ST PARIS	4	63,072	5.47%
FIFTH THIRD BANK	2	58,066	5.03%
PNC BANK NATIONAL ASSN	2	48,399	4.20%
UNION BANKING CO	2	33,863	2.94%
PEOPLES SAVINGS&LOAN CO	1	30,758	2.67%
UNITED MIDWEST SAVINGS BANK	1	30,486	2.64%
CITIZENS BANK OF DE GRAFF	1	23,749	2.06%
LIBERTY NATIONAL BANK	1	13,900	1.20%
RICHWOOD BANKING CO	1	13,642	1.18%
OSGOOD STATE BANK	1	3,567	0.31%
WOODFOREST NATIONAL BANK	2	1,211	0.10%
Number of Institutions in the Market: 17	33	1,153,612	100%

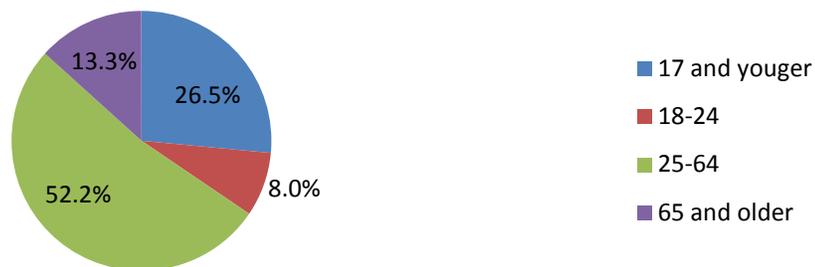
Based on the FDIC’s deposit market share report, as of June 30, 2010, Citizens ranked second with 12.46% of the deposit market share.¹¹ In addition, Citizens ranked third with 14.08% of the deposit market share in Champaign County and third with 10.7% of the deposit market share in Logan County. Within this assessment area, the bank originated 264 consumer loans, 126 small business loans, 64 HMDA loans and 41 farm loans. The percentage of total lending in this assessment area is 26.4% of the bank’s lending compared to 12.5% of the bank’s share of deposits.

A community contact involved in the management of the Village of West Mansfield stated that lending is readily available to small businesses and individuals in Logan County through small and large financial institutions.

Population

The 2000 U.S. Census Bureau report indicates that the population within the assessment area was 84,895. The population by age was distributed as follows:

Population by Age



Income Characteristics

According to the 2000 U.S. Census Bureau report, there were 32,916 households in this area, of which, 23,628 (71.8%) were designated as families. Of these families, 13.8% were low-income, 17.0% were moderate-income, 23.5% were middle-income, and 45.7% were upper-income. In the assessment area, 6.2% of the families lived below the poverty level, which was slightly lower than the State of Ohio’s poverty rate of 7.8%.

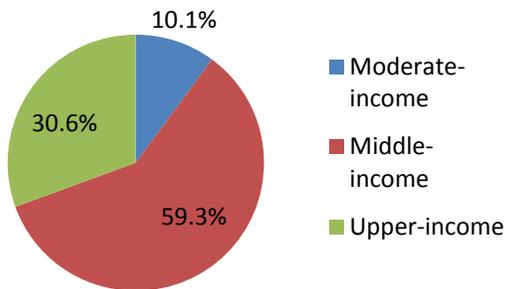
The MFI for the assessment area was \$49,149, compared to the State of Ohio’s MFI of \$50,037. According to HUD, the estimated MFI for 2010 increased to \$53,700.

¹¹ <http://www2.fdic.gov/sod/index.asp>

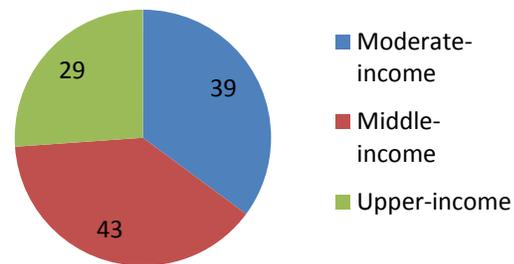
Housing

The assessment area contains 37,461 housing units, of which 66.6% are owner-occupied, 21.3% are rental, and 12.1% are vacant. Single-family units comprise 76.2% of the housing units, while two-to-four family units comprise 8.0%, multi-family units comprise 5.0%, and mobile homes comprise 10.7%. The median age of the housing stock within the assessment area is 38 years. The following graphs depict the distribution of housing units and the median age of housing stock by tract income in this assessment area:

Distribution of Housing Units



Median Age of Housing Stock



The median housing value for this assessment area was \$90,494. Specifically, 78.6% of the owner-occupied units within the assessment area were valued at \$60,000 or more, and 17.7% of owner-occupied units were valued at \$150,000 or more. This is slightly lower than the State of Ohio, in which 82.8% of the owner-occupied units were valued at \$60,000 or more and 24.0% were valued at \$150,000 or more. The following graph depicts the median housing values by tract income:

Median Housing Value



Based on the median family income, over half of the homes in the assessment area are affordable for low-income individuals and approximately 82.0% of the homes are affordable for moderate-income individuals, when using a mortgage payment equal to 30.0% of gross income.

Labor, Employment, and Economics

The following table illustrates land use in each county in the assessment area:

	Urban	Cropland	Pasture	Forest
Champaign County	6.5%	65.9%	5.6%	21.1%
Logan County	3.5%	52.8%	8.7%	31.0%

With the majority of land being used for farming and additional land covered by forest, land available for business uses and residential properties is limited.

The assessment area had 2,605 small businesses and 528 small farms according to the 2008 Dun & Bradstreet data. The top five industries include agricultural (15.6%); other services (14.8%); retail trade (12.2%); professional, scientific, and technical services (6.6%), and health care and social assistance (5.6%). The majority of businesses (91.0%) have revenues of less than \$1 million annually. Most businesses (78.4%) have been in existence over ten years and 39.9% of those businesses are more than 25 years old.

A community contact involved in city government stated that local closures of the DAB and Siemens plants had negative effects on Logan County. The contact also stated that the closure of the Rockwell plant in Kenton, Ohio negatively affected Logan County. However, the contact stated that Honda has provided some job stability in the community through spin-off businesses (such as suppliers).

The following table identifies major employers in Champaign and Logan counties:

Champaign County:

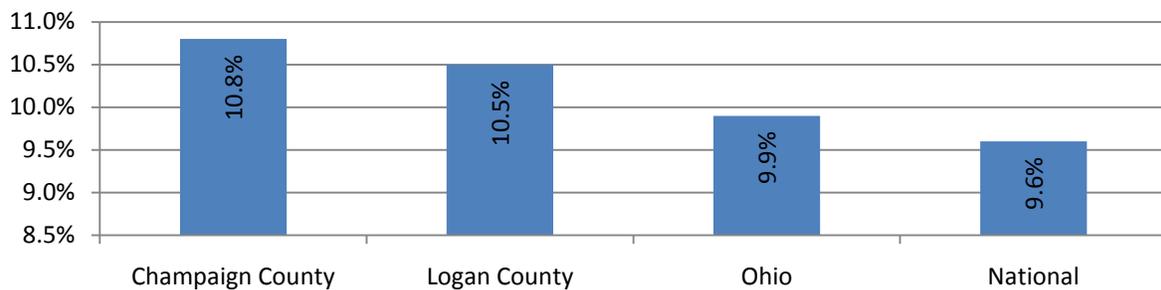
Business Name	Industry
Community Mercy Health Partners	Service
Graham Local Schools	Government
Honeywell International Inc	Manufacturing
KTH Parts Industries Inc	Manufacturing
Menasha Corp/ORBIS	Manufacturing
Rittal Corp	Manufacturing
Urbana City Schools	Government
Urbana University	Service
Wal-Mart Stores Inc	Trade

Logan County:

Business Name	Industry
Asahi Glass Co Ltd/AGC Automotive	Manufacturing
Bellefontaine City Schools	Government
Belletech Corp	Manufacturing
HBD Industries	Manufacturing
Honda Motor Co Ltd	Manufacturing
Mary Rutan Hospital	Service
Nash-Finch Co	Trade
Wal-Mart Stores Inc	Trade
West Liberty Salem Local Schools	Government

The following chart shows unemployment rates for October 2010 for Champaign and Logan counties, compared to the State of Ohio and national averages:

Unemployment Rates October 2010



The chart shows that Champaign and Logan counties have slightly higher unemployment rates than the State of Ohio and the national average.

Data from realtytrac.com indicates that as of October 2010, there were 301 foreclosed homes in Champaign County and one in every 633 housing units received foreclosure filings during this time. There were 346 foreclosed homes in Logan County and one in every 471 housing units received foreclosure filings during this time.

Unemployment and foreclosure levels were considered when evaluating the bank's lending performance in this area.

The following table illustrates the demographics of this assessment area, based on data from the 2000 U.S. Census Bureau report:

Combined Demographics Report

Citizens Banking Company

Assessment Area(s): West Central NonMSA OH

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	3,264	13.8
Moderate-income	2	11.1	2,177	9.2	275	12.6	4,027	17.0
Middle-income	11	61.1	13,088	55.4	871	6.7	5,543	23.5
Upper-income	5	27.8	8,363	35.4	306	3.7	10,794	45.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	18	100.0	23,628	100.0	1,452	6.1	23,628	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	3,780	2,044	8.2	54.1	1,481	39.2	255	6.7
Middle-income	22,199	13,887	55.7	62.6	4,676	21.1	3,636	16.4
Upper-income	11,482	9,005	36.1	78.4	1,815	15.8	662	5.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	37,461	24,936	100.0	66.6	7,972	21.3	4,553	12.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	278	9.5	234	9.0	29	16.0	15	11.9
Middle-income	1,840	63.2	1,643	63.1	111	61.3	86	68.3
Upper-income	794	27.3	728	27.9	41	22.7	25	19.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,912	100.0	2,605	100.0	181	100.0	126	100.0
Percentage of Total Businesses:			89.5		6.2		4.3	
	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	13	2.4	13	2.5	0	0.0	0	0.0
Middle-income	299	55.9	295	55.9	4	57.1	0	0.0
Upper-income	223	41.7	220	41.7	3	42.9	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	535	100.0	528	100.0	7	100.0	0	0.0
Percentage of Total Farms:			98.7		1.3		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

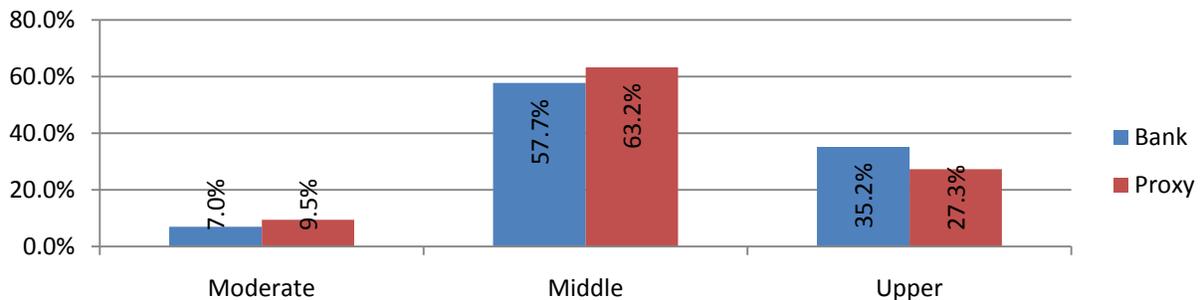
Lending Test

Citizens' performance reflects an adequate responsiveness to the credit needs of the community, a reasonable geographic distribution of loans in the area, and an adequate distribution among borrowers of different income levels and businesses of different revenue sizes. The bank made two community development loans, totaling \$2.6 million, which is considered an excellent level of community development lending. The loans were for organizations that provide services to low- and moderate-income individuals.

Geographic Distribution

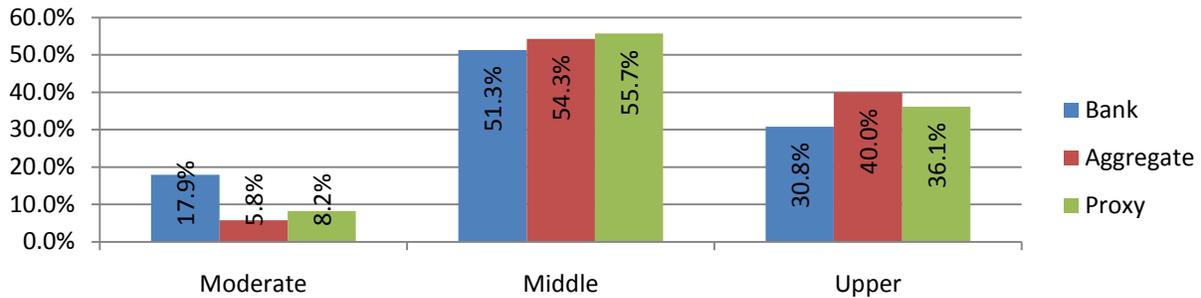
The geographic distribution of loans reflects a reasonable penetration throughout the assessment area. There were two census tracts (one moderate-income and one middle-income) in Logan County where no loans were extended during the evaluation period. The moderate-income tract that had no lending is located in the city of Bellefontaine, which has three large national banks. In addition, the three national banks (Huntington National Bank, PNC Bank, and Fifth Third Bank) are located in closer proximity to the moderate-income tract. The middle-income tract that had no lending is the greatest distance from any of the bank's branches in comparison to the other tracts in Logan County.

Small Business Lending by Tract



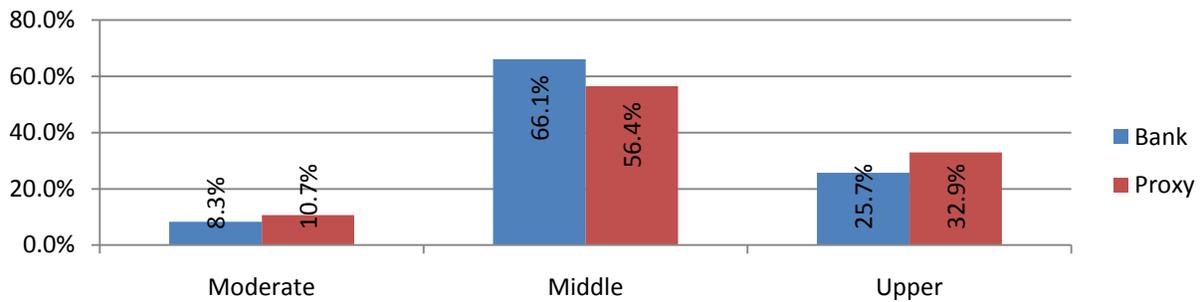
The chart shows that Citizens originated a lower percentage of loans in moderate-income tracts than the percentage of businesses in moderate-income tracts. This reflects an adequate level of lending in moderate-income tracts.

HMDA Lending by Tract



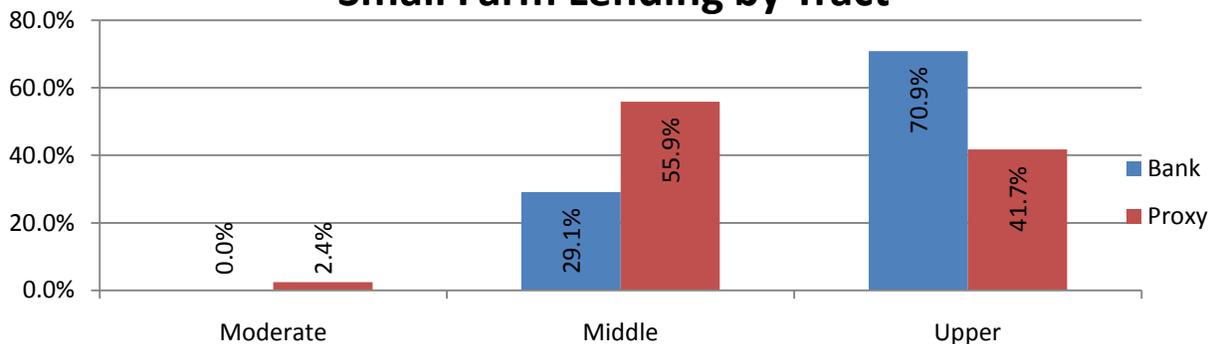
The above chart shows that Citizens originated a significantly higher percentage of HMDA loans than the percentage of owner-occupied units in moderate-income tracts and the percentage of HMDA loans originated by the aggregate of all lenders in the moderate-income tracts. This reflects an excellent level of lending in moderate-income tracts.

Consumer Lending by Tract



The above chart shows that Citizens originated a lower percentage of loans than the percentage of households in moderate-income tracts. This reflects an adequate good level of lending in moderate-income tracts.

Small Farm Lending by Tract

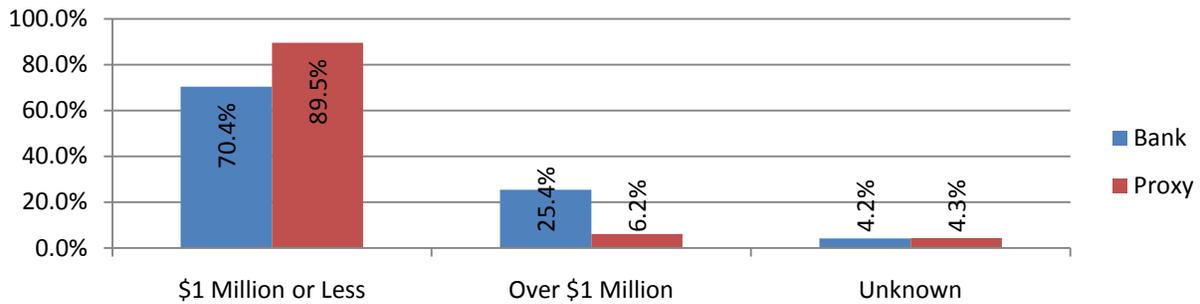


The above chart shows that Citizens did not originate any small farm loans in moderate-income tracts. This reflects a poor level of lending. However, there are only 13 farms located in the moderate-income tracts, which indicates that opportunities for small farm lending are limited.

Borrower Distribution

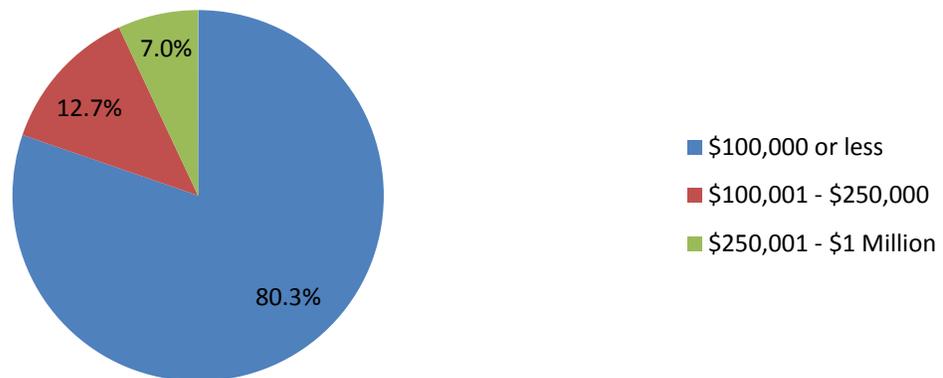
Lending in this assessment area reflects a reasonable distribution of lending to borrowers of different incomes and to businesses of different revenue size.

Lending by Revenue Size



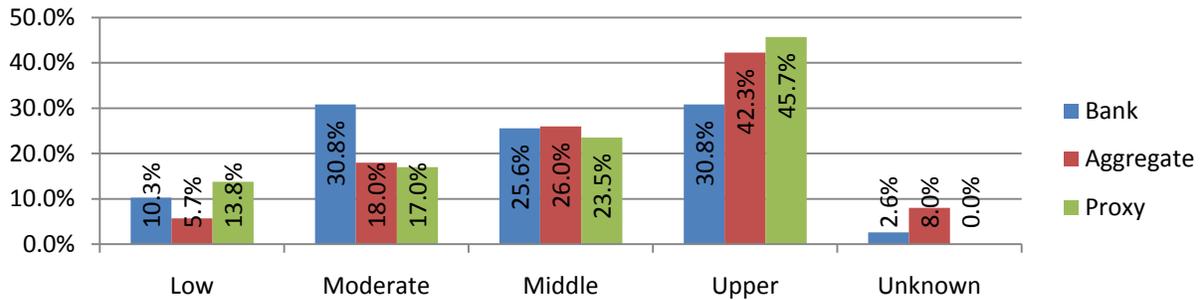
The above chart shows that Citizens originated a lower percentage of small business loans than the percentage of businesses with revenues of \$1 million or less. Lending to small businesses with \$1 million or less in revenue is good.

Percentage of Small Business Loans by Loan Size



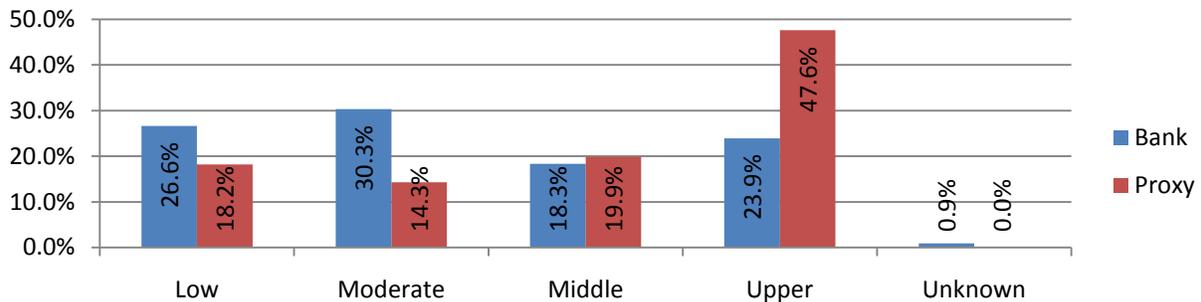
The above chart illustrates the distribution of business loans by loan size and reflects that the majority of the bank’s business lending is for small loan amounts. Smaller loan amounts are often indicative of the credit needs of small businesses.

Lending by Family Income



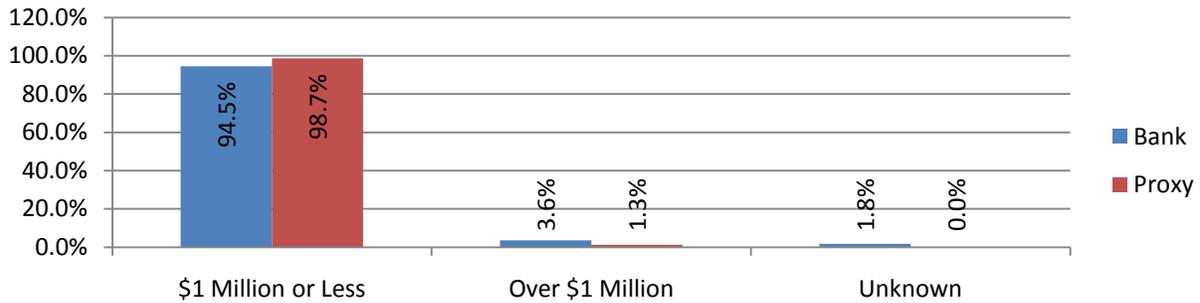
The above chart shows that Citizens originated a substantially higher percentage of HMDA loans to low-income families as compared to the aggregate percentage of all lenders. In addition, Citizens originated a lower percentage of HMDA loans to low-income families as compared to the percentage of low-income families in the assessment area. HMDA lending to low-income families is good. Citizens originated a substantially higher percentage of HMDA loans to moderate-income families as compared to the aggregate and the proxy. HMDA lending to moderate-income families is excellent.

Lending by Household Income



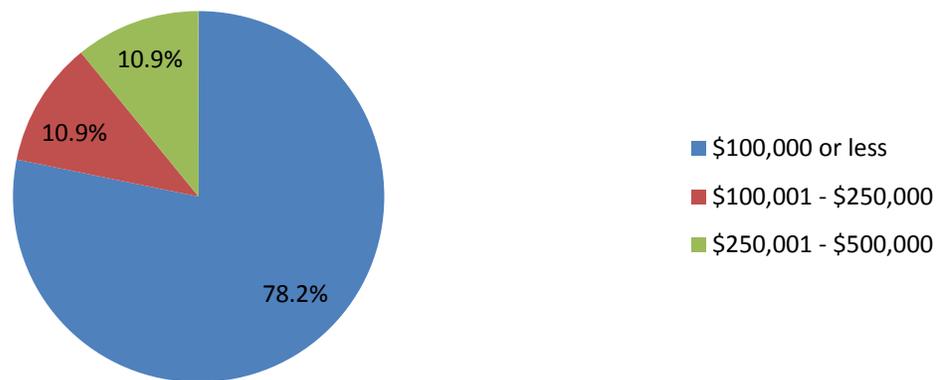
The chart shows Citizens originated a significantly higher percentage of consumer loans to low- and moderate-income borrowers than the percentage of low- and moderate-income households in the assessment area. This reflects an excellent level of lending to low- and moderate-income borrowers.

Lending by Revenue Size



The above chart shows that Citizens originated a slightly lower percentage of small farm loans than the percentage of farms with revenues of \$1 million or less. Lending to small farms with \$1 million or less in revenue is good.

Percentage of Small Farm Loans by Loan Size



The above chart illustrates the distribution of farm loans by loan size, and indicates that the majority of the bank’s farm loans are for smaller amounts. Small loan amounts are often indicative of the credit needs of small farms. This further illustrates that Citizens is supporting the credit needs of small farms in this area.

Community Development Test

The bank demonstrated an adequate responsiveness to the community development needs of this assessment area through community development loans and qualified investments, considering its capacity and the needs and availability of such opportunities for community development in this assessment area.

Community Development Loans

Citizens demonstrated an excellent responsiveness to community development lending needs in this assessment area. The bank originated two community development loans totaling \$2,600,000 during this evaluation period. The loans were for operating expenses to organizations that provide services to low- and moderate-income individuals.

Qualified Investments

Citizens demonstrated an adequate responsiveness to community development investment needs. The bank’s qualified investments were entirely donations to community development organizations. The bank made three qualified donations during this evaluation period, within this assessment area, totaling \$25,520. The donations were made to organizations that provide services targeted to low- and moderate-income individuals.

Community Development Services

Citizens demonstrated an adequate responsiveness to community development service needs. The following chart displays the branch distribution by tract income level compared to demographics:

	# of Branches	Percentage of Branches	# of Tracts	Percentage of Tracts	Percentage of Families	Percentage of Households
Moderate-income	0	0%	2	11.1%	9.2%	10.7%
Middle-income	5	100%	11	61.1%	55.4%	56.4%
Upper-income	0	0%	5	27.8%	35.4%	32.9%

The chart shows that the distribution of branches does not reflect the geographic demographics of the assessment area, as there are no offices in moderate-income tracts. There are two stand-alone ATMs and five branches located in middle-income tracts. Although there are no branches in moderate-income tracts, middle-income geographies, families, and households comprise the majority of the assessment area. Banking services are also available through online and telephone banking.

The bank did not perform any qualified community development services in this area during this evaluation period.

DESCRIPTION OF COLUMBUS, OHIO MSA 18140

The Columbus, Ohio MSA 18140 MSA contains portions of Franklin, Delaware, and Madison counties. The assessment area consists of 25 tracts, of which nine are middle-income and 16 are upper-income tracts. This assessment area accounted for 1.8% (34 loans) of the bank's total lending.

The table below depicts the 43 financial institutions insured by the FDIC that operate in this assessment area:

Institution Name	Number of Offices	Deposits (\$000)	Market Share
HUNTINGTON NATIONAL BANK	60	8,699,748	23.65%
JPMORGAN CHASE BANK NA	65	7,566,160	20.57%
PNC BANK NATIONAL ASSN	53	6,268,375	17.04%
FIFTH THIRD BANK	54	3,468,429	9.43%
NATIONWIDE BANK	2	2,847,866	7.74%
KEYBANK NATIONAL ASSN	26	1,821,242	4.95%
U S BANK NATIONAL ASSN	43	1,097,367	2.98%
WORLD FINANCIAL NETWORK NB	1	800,632	2.18%
DELAWARE COUNTY B&T CO	18	505,385	1.37%
WESBANCO BANK INC	10	503,112	1.37%
HEARTLAND BANK	9	372,690	1.01%
FIRST MERCHANTS BANK NA	1	368,697	1.00%
UNION SAVINGS BANK	6	327,958	0.89%
FIRSTMERIT BANK NA	14	248,507	0.68%
ARLINGTON BANK	3	186,398	0.51%
PARK NATIONAL BANK	6	149,734	0.41%
COLUMBUS FIRST BANK	1	128,407	0.35%
BENCHMARK BANK	2	126,160	0.34%
FIRST BEXLEY BANK	1	122,599	0.33%
FARMERS CITIZENS BANK	2	115,508	0.31%
GUERNSEY BANK	3	108,538	0.30%
FIRST COMMUNITY BANK	4	103,243	0.28%
INSIGHT BANK	1	95,569	0.26%
UNITED MIDWEST SAVINGS BANK	1	95,184	0.26%
GREAT LAKES BANKERS BANK	1	82,321	0.22%
FIDELITY FS&LA	2	77,657	0.21%
COOPER STATE BANK	6	75,369	0.20%
CITIZENS BANKING CO	3	60,945	0.17%
EMERALD BANK	2	58,907	0.16%
FIRST CITY BANK	1	55,997	0.15%

Institution Name	Number of Offices	Deposits (\$000)	Market Share
VINTON COUNTY NB OF MCARTHUR	1	50,160	0.14%
ADVANTAGE BANK	3	49,309	0.13%
MERCHANTS NATIONAL BANK	1	38,414	0.10%
RBS CITIZENS NATIONAL ASSN	11	36,097	0.10%
FIRST PLACE BANK	1	22,743	0.06%
CFBANK	1	19,322	0.05%
OHIO VALLEY BANK CO	1	12,697	0.03%
MILTON BANKING CO	1	7,306	0.02%
OHIO STATE BANK	1	4,910	0.01%
FIRST CITIZENS NB UPPER SAND	1	4,160	0.01%
FIRST FS&LA	1	3,291	0.01%
WOODFOREST NATIONAL BANK	3	1,954	0.01%
CITIZENS BANK OF ASHVILLE OH	1	158	0.00%
Number of Institutions in the Market: 43	428	36,789,225	100%

Based on the FDIC's deposit market share report as of June 30, 2010, Citizens ranked 28th with 0.17% of the deposit market share¹². As shown in the table above, this assessment area has a substantial amount of competition.

The following table illustrates the demographic characteristics of this assessment area based on data from the 2000 U.S. Census Bureau report:

¹² <http://www2.fdic.gov/sod/index.asp>

Combined Demographics Report

Citizens Banking Company

Assessment Area(s): MSA 18140

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	3,050	7.6
Moderate-income	0	0.0	0	0.0	0	0.0	4,556	11.3
Middle-income	9	36.0	13,360	33.1	466	3.5	8,806	21.8
Upper-income	16	64.0	27,017	66.9	365	1.4	23,965	59.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	25	100.0	40,377	100.0	831	2.1	40,377	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	22,299	11,831	30.2	53.1	9,197	41.2	1,271	5.7
Upper-income	39,140	27,380	69.8	70.0	9,789	25.0	1,971	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	61,439	39,211	100.0	63.8	18,986	30.9	3,242	5.3
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	2,377	33.5	2,067	33.0	250	38.1	60	33.9
Upper-income	4,718	66.5	4,195	67.0	406	61.9	117	66.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,095	100.0	6,262	100.0	656	100.0	177	100.0
Percentage of Total Businesses:				88.3		9.2		2.5
	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	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	68	55.7	67	55.4	1	100.0	0	0.0
Upper-income	54	44.3	54	44.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	122	100.0	121	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		0.0

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

The bank's lending performance in this assessment area was consistent with its overall performance. Despite the limited volume of lending, Citizens' performance was comparable to the proxies.

Community Development Test

Citizens' community development performance in this assessment area is below the overall performance. However, given the presence of large, regional and multi-regional banks in the area, opportunities for community development loans, services, and investments are limited. The bank's employees however did provide their financial expertise to local organizations that focus on community and economic development through board and committee memberships. In addition, the geographic distribution of branches aligned with the assessment area demographics.

A community contact involved in providing affordable housing to low- and moderate-income households, stated that foreclosures have had a significant impact on their clients and to LMI families. The need for financial education that includes credit and foreclosure prevention counseling is in high demand.

DESCRIPTION OF TOLEDO, OHIO MSA 45780

The Toledo, Ohio MSA 45780 consists of portions of Ottawa County. The assessment area contains six middle-income census tracts. Lending in this assessment area accounted for 2.6% (49 loans) of the bank's total lending.

The table below depicts the 13 financial institutions insured by the FDIC that operate in this assessment area:

Institution Name	Number of Offices	Deposits (\$000)	Market Share
HUNTINGTON NATIONAL BANK	4	179,081	25.83%
NATIONAL BANK OF OAK HARBOR	3	141,266	20.38%
GENOA BANKING CO	2	120,214	17.34%
KEYBANK NATIONAL ASSN	1	47,293	6.82%
U S BANK NATIONAL ASSN	3	46,656	6.73%
FIRST FEDERAL BANK OF THE MW	1	36,894	5.32%
FIRST NB OF BELLEVUE	3	32,021	4.62%
MARBLEHEAD BANK	3	28,078	4.05%
PNC BANK NATIONAL ASSN	1	26,421	3.81%
FIRST FS&LA OF LORAIN	1	25,045	3.61%
CROGHAN COLONIAL BANK	1	5,288	0.76%
CITIZENS BANKING CO	1	4,116	0.59%
WOODFOREST NATIONAL BANK	1	941	0.14%
Number of Institutions in the Market: 13	25	693,314	100%

Based on the FDIC's deposit market share report, as of June 30, 2010, Citizens ranked 12th with 0.59% deposit market share.¹³ This data indicates that there is significant banking competition in this area.

The following table illustrates the demographics of this assessment area, based on data from the 2000 U.S. Census Bureau report:

¹³ <http://www2.fdic.gov/sod/index.asp>

Combined Demographics Report

Citizens Banking Company

Assessment Area(s): MSA 45780

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	992	17.8
Moderate-income	0	0.0	0	0.0	0	0.0	1,126	20.2
Middle-income	6	100.0	5,575	100.0	294	5.3	1,437	25.8
Upper-income	0	0.0	0	0.0	0	0.0	2,020	36.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6	100.0	5,575	100.0	294	5.3	5,575	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	16,399	6,477	100.0	39.5	1,872	11.4	8,050	49.1
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	16,399	6,477	100.0	39.5	1,872	11.4	8,050	49.1
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	1,295	100.0	1,163	100.0	69	100.0	63	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,295	100.0	1,163	100.0	69	100.0	63	100.0
Percentage of Total Businesses:			89.8		5.3		4.9	
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	23	100.0	23	100.0	0	0.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	23	100.0	23	100.0	0	0.0	0	0.0
Percentage of Total Farms:			100.0		0.0		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMNACE TESTS

Lending Test

Citizens' lending performance in this assessment area was below the overall performance of the bank. However, there were no gaps noted regarding the dispersion of loans throughout the assessment area, as the bank made loans in all census tracts during the evaluation period.

Community Development Test

Citizens' community development performance in this assessment area is consistent with its overall performance. The bank's employees provided their financial expertise to local organizations that focus on community and economic development, through board and committee memberships. In addition, bank employees provided their financial expertise to local organizations that provide affordable housing through board and committee memberships. The bank did not originate any community development loans during the evaluation period. However, the bank did make two donations totaling \$2,125 and one investment for a bond to provide affordable housing for \$1,140,227. The branch distribution aligns with the assessment area demographics.

DESCRIPTION OF AKRON, OHIO MSA 10420

The Akron, Ohio MSA 10420 contains portions of Summit County, which is comprised of four middle-income and eight upper-income census tracts. Lending in this assessment area accounted for 0.7% (13 loans) of the bank's total lending. The low level of lending is attributed to the Citizens' limited presence and the high level of competition in the area. Several large institutions have lending operations in this area. In addition, a community contact stated that larger financial institutions have met credit needs and community development needs in the area. Many of the community development programs that the contact mentioned were either financed or invested in by large financial institutions.

The table below depicts the 22 financial institutions insured by the FDIC that operate in this assessment area:

Institution Name	Number of Offices	Deposits (\$000)	Market Share
FIRSTMERIT BANK NA	31	2,587,339	26.27%
PNC BANK NATIONAL ASSN	22	1,373,550	13.94%
KEYBANK NATIONAL ASSN	15	1,129,721	11.47%
JPMORGAN CHASE BANK NA	15	1,103,595	11.20%
FIFTH THIRD BANK	15	769,257	7.81%
RBS CITIZENS NATIONAL ASSN	19	570,676	5.79%
THIRD FS&LA OF CLEVELAND	3	498,722	5.06%
NEW YORK COMMUNITY BANK	5	496,147	5.04%
HUNTINGTON NATIONAL BANK	8	417,860	4.24%
U S BANK NATIONAL ASSN	17	219,154	2.22%
CFBANK	1	131,575	1.34%
LORAIN NATIONAL BANK	1	114,414	1.16%
NORTH AKRON SAVINGS BANK	5	111,639	1.13%
VALLEY SAVINGS BANK	2	71,387	0.72%
LIBERTY BANK NATIONAL ASSN	1	62,474	0.63%
WESTFIELD BANK FSB	1	59,937	0.61%
PARK VIEW FSB	1	52,108	0.53%
CITIZENS BANK	2	31,929	0.32%
DOLLAR BANK FSB	1	22,477	0.23%
CITIZENS BANKING CO	1	14,563	0.15%
APPLE CREEK BANKING CO	1	7,343	0.07%
FIRST NATIONAL BANK	1	3,936	0.04%
Number of Institutions in the Market: 22	168	9,849,803	100%

Based on the FDIC's deposit market share report, as of June 30, 2010, Citizens ranked 20th with 0.15% of the deposit market share. This further reflects the significant banking competition in this area.

The following table illustrates the demographics of this assessment area based on data from the 2000 U.S. Census Bureau report:

Combined Demographics Report

Citizens Banking Company

Assessment Area(s): MSA 10420

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	1,733	11.4
Moderate-income	0	0.0	0	0.0	0	0.0	2,049	13.4
Middle-income	4	33.3	5,707	37.4	330	5.8	2,864	18.8
Upper-income	8	66.7	9,556	62.6	156	1.6	8,617	56.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	12	100.0	15,263	100.0	486	3.2	15,263	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	9,559	5,903	35.9	61.8	3,132	32.8	524	5.5
Upper-income	13,399	10,556	64.1	78.8	2,253	16.8	590	4.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	22,958	16,459	100.0	71.7	5,385	23.5	1,114	4.9
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	847	25.4	778	26.8	47	13.8	22	26.2
Upper-income	2,486	74.6	2,130	73.2	294	86.2	62	73.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,333	100.0	2,908	100.0	341	100.0	84	100.0
Percentage of Total Businesses:			87.2		10.2		2.5	
	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	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	7	20.0	7	20.0	0	0.0	0	0.0
Upper-income	28	80.0	28	80.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	35	100.0	35	100.0	0	0.0	0	0.0
Percentage of Total Farms:			100.0		0.0		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMNACE TESTS

Lending Test

Citizens' lending performance in this assessment area was below the overall performance of the bank. However, this is largely attributable to Citizens' limited presence and high competition in the area.

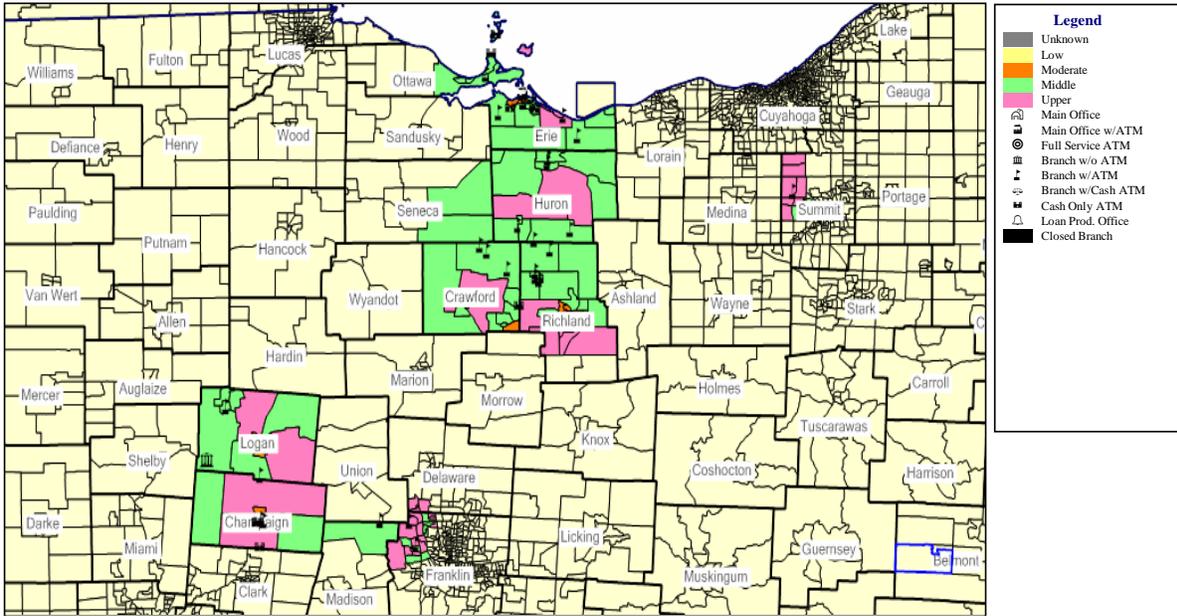
Community Development Test

Citizens' community development performance in this assessment area is consistent with the overall performance. The bank's employees provided their financial expertise to local organizations that provide community development through board and committee memberships. The bank made originated one community development loan during this evaluation period of \$75,000 and one donation totaling \$500. The geographic distribution of branches aligned with the assessment area demographics. As mentioned above, the bank has limited opportunities to engage in community development activities due to its small presence in this assessment area and the presence of several large financial institutions.

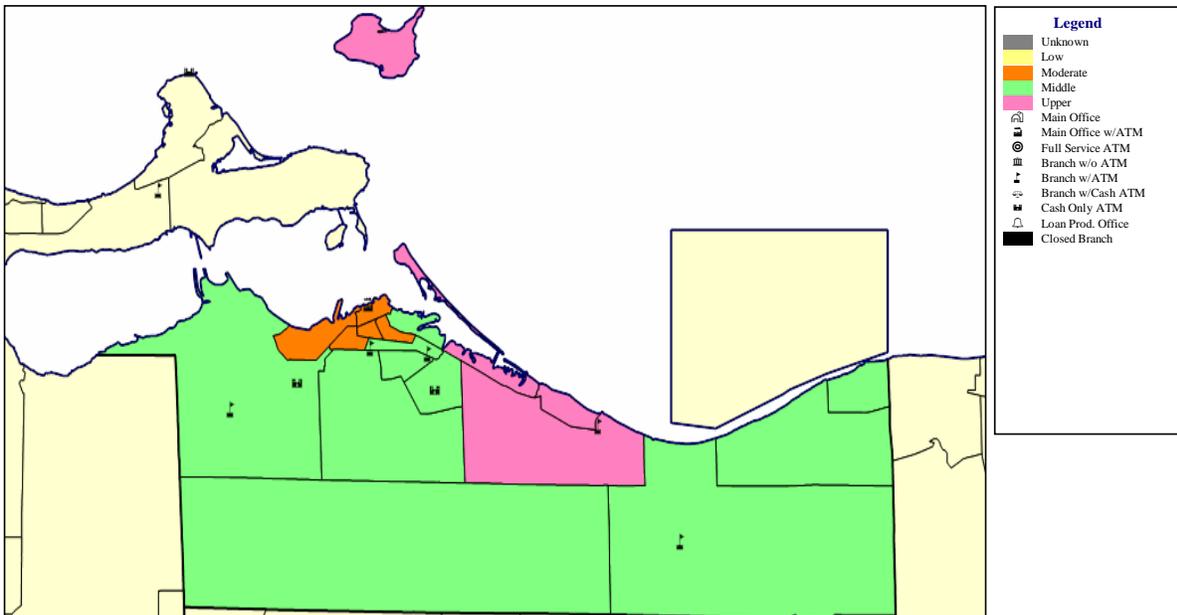
APPENDIX A

ASSESSMENT AREA MAPS

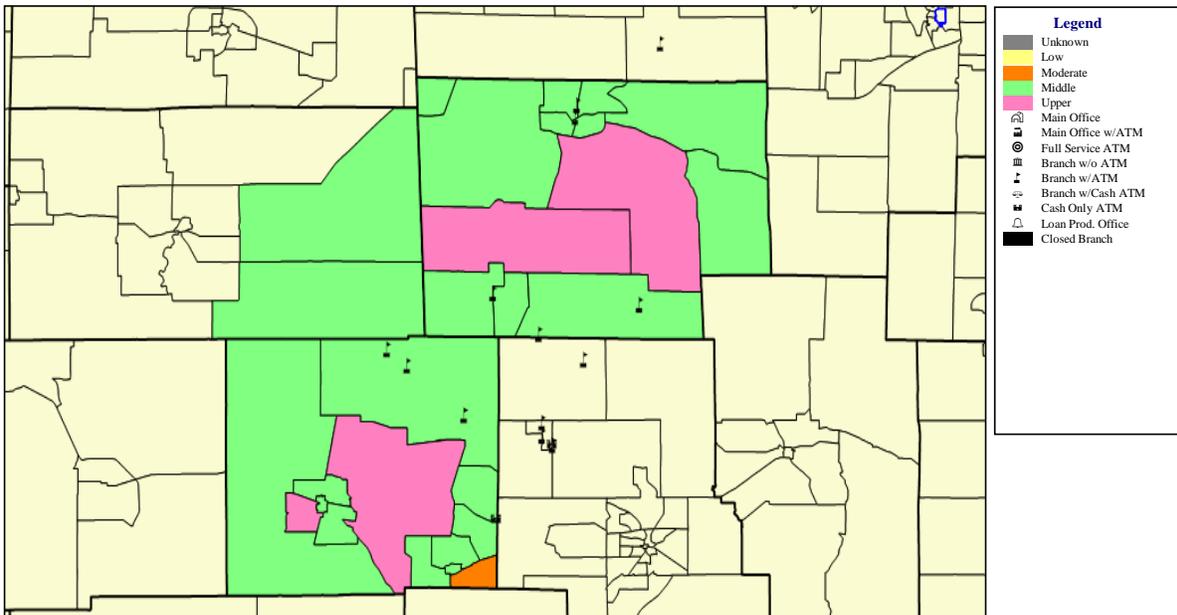
Citizens Banking Company
Assessment Area: Overall



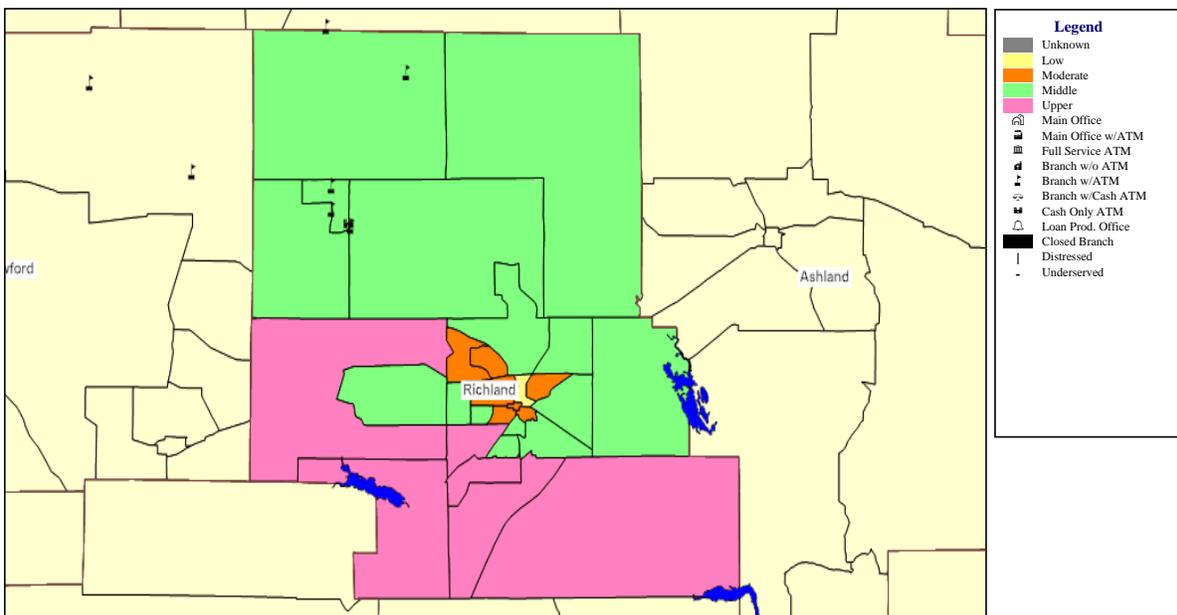
Citizens Banking Company
Assessment Area: MSA 41780



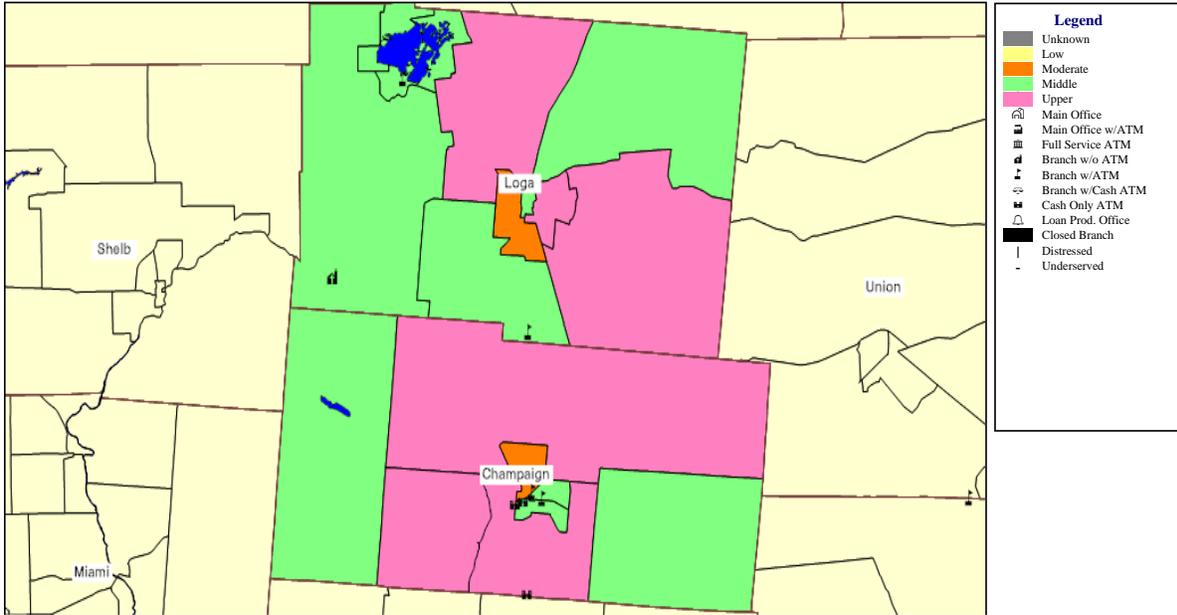
Citizens Banking Company
Assessment Area: North Central NonMSA OH



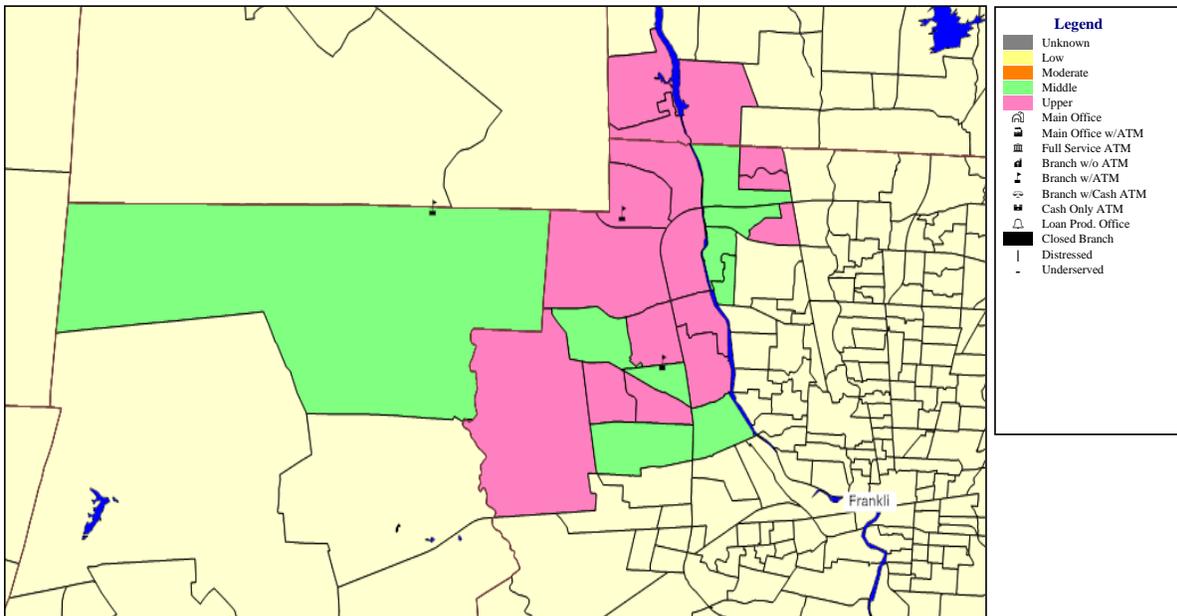
Citizens Banking Company
Assessment Area: MSA 31900



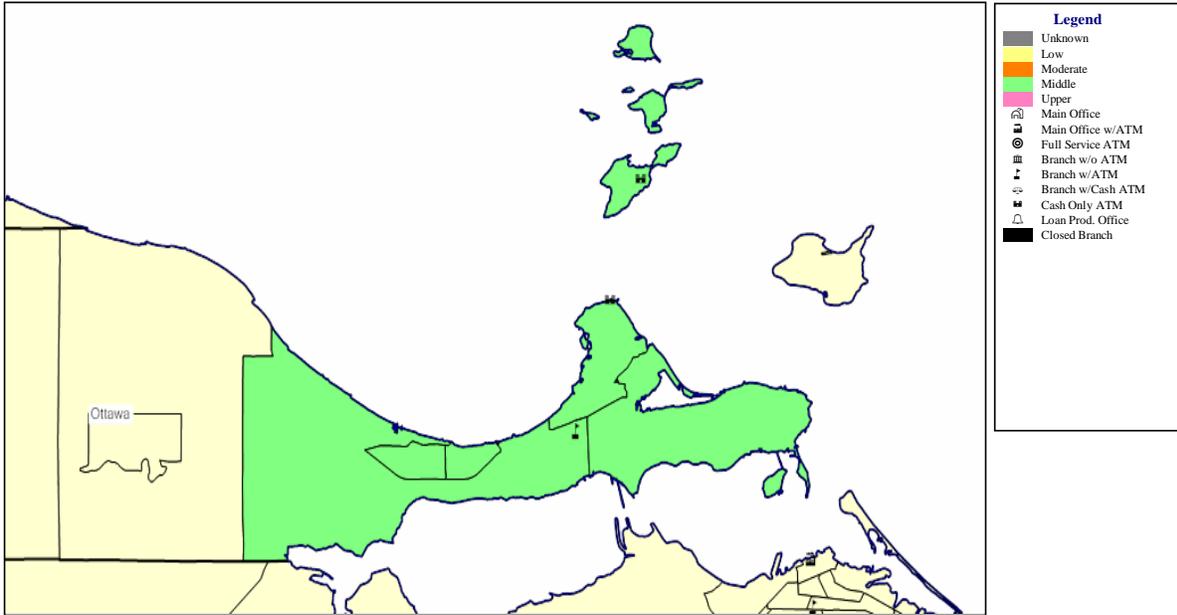
Citizens Banking Company
Assessment Area: West Central NonMSA OH



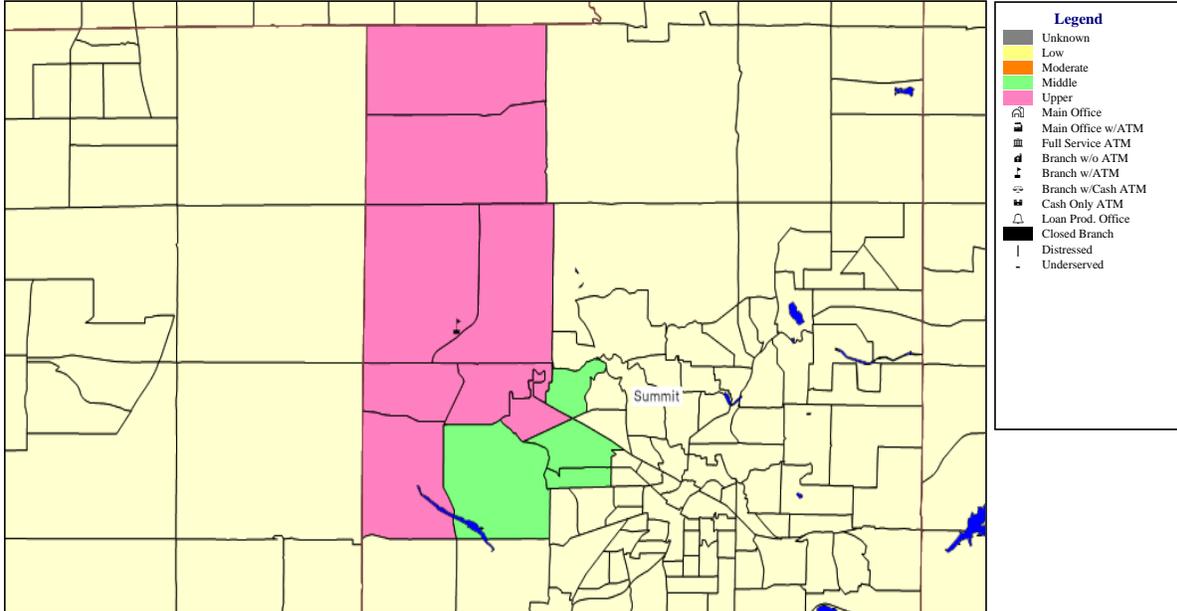
Citizens Banking Company
Assessment Area: MSA 18140



Citizens Bank
Assessment Area: MSA 45780



Citizens Banking Company
Assessment Area: MSA 10420



APPENDIX B
LENDING TABLES

Overall

Geographic Distribution of Small Loans to Businesses and Farms										
Assessment Area/Group: Overall										
	Total Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans
Small Business	526	76.5	0.6	0.2	8.1	10.5	52.2	68.8	39.2	20.5
Small Farm	162	23.5	0.0	0.0	1.1	0.0	68.7	68.5	30.2	31.5

Borrower Distribution of Small Loans to Businesses and Farms							
Assessment Area/Group: Overall							
	Total Loans		Businesses/Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses/ Farms	% Bank Loans	\$100,000 or Less	>\$100,001 to \$250,000	>\$250,001 to \$1,000,000
Small Business	526	76.5	88.6	67.7	73.4	16.9	9.7
Small Farm	162	23.5	99.0	90.1	81.5	14.2	4.3

Geographic Distribution of HMDA Loans										
Assessment Area/Group: Overall										
	Total HMDA Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans
Home Purchase	84	25.6	0.0	0.0	7.0	9.5	55.8	75.0	37.2	15.5
Refinance	174	53.0	0.0	0.0	7.0	10.3	55.8	67.8	37.2	21.8
Home Improvement	70	21.3	0.0	1.4	7.0	14.3	55.8	72.9	37.2	11.4

Borrower Distribution of HMDA Loans										
Assessment Area/Group: Overall										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans
Home Purchase	84	25.6	14.0	16.7	16.5	25.0	23.0	21.4	46.5	31.0
Refinance	174	53.0	14.0	13.8	16.5	21.3	23.0	21.8	46.5	38.5
Home Improvement	70	21.3	14.0	15.7	16.5	30.0	23.0	25.7	46.5	24.3

Geographic Distribution of Consumer Loans										
Assessment Area/Group: Overall										
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	136	15.8	0.1	0.0	9.2	11.0	56.4	73.5	34.3	15.4
Motor Vehicle	243	28.2	0.1	0.0	9.2	11.9	56.4	72.0	34.3	16.0
Other - Secured	165	19.2	0.1	0.0	9.2	11.5	56.4	78.8	34.3	9.7
Other - Unsecured	317	36.8	0.1	0.0	9.2	8.2	56.4	75.1	34.3	16.7

Borrower Distribution of Consumer Loans										
Assessment Area/Group: Overall										
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	136	15.8	17.3	16.9	15.2	21.3	19.5	20.6	48.0	40.4
Motor Vehicle	243	28.2	17.3	23.0	15.2	31.3	19.5	23.5	48.0	21.8
Other - Secured	165	19.2	17.3	30.9	15.2	39.4	19.5	18.8	48.0	9.7
Other - Unsecured	317	36.8	17.3	27.4	15.2	34.1	19.5	23.0	48.0	14.5

Sandusky, Ohio MSA 41780

Geographic Distribution of Small Loans to Businesses and Farms								
Assessment Area/Group: MSA 41780								
	Total Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses/Farms	% Bank Loans	% of Businesses/Farms	% Bank Loans	% of Businesses/Farms	% Bank Loans
Small Business	180	89.1	24.7	26.1	59.3	53.3	16.1	20.6
Small Farm	22	10.9	0.7	0.0	87.6	86.4	11.7	13.6

Borrower Distribution of Small Loans to Businesses and Farms							
Assessment Area/Group: MSA 41780							
	Total Loans		Businesses/Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses/Farms	% Bank Loans	\$100,000 or Less	>\$100,001 to \$250,000	>\$250,001 to \$1,000,000
Small Business	180	89.1	88.4	63.3	67.2	20.6	12.2
Small Farm	22	10.9	99.3	72.7	59.1	40.9	0.0

Geographic Distribution of HMDA Loans								
Assessment Area/Group: MSA 41780								
	Total HMDA Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans
Home Purchase	36	24.3	18.6	22.2	65.6	66.7	15.9	11.1
Refinance	74	50.0	18.6	14.9	65.6	62.2	15.9	23.0
Home Improvement	38	25.7	18.6	21.1	65.6	65.8	15.9	13.2

Borrower Distribution of HMDA Loans										
Assessment Area/Group: MSA 41780										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans
Home Purchase	36	24.3	19.0	22.2	18.6	19.4	23.3	22.2	39.1	33.3
Refinance	74	50.0	19.0	14.9	18.6	23.0	23.3	20.3	39.1	41.9
Home Improvement	38	25.7	19.0	21.1	18.6	28.9	23.3	31.6	39.1	18.4

Geographic Distribution of Consumer Loans								
Assessment Area/Group: MSA 41780								
	Total Consumer Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	79	23.7	25.5	17.7	59.7	63.3	14.8	19.0
Motor Vehicle	101	30.3	25.5	22.8	59.7	62.4	14.8	14.9
Other - Secured	59	17.7	25.5	30.5	59.7	62.7	14.8	6.8
Other - Unsecured	94	28.2	25.5	22.3	59.7	63.8	14.8	13.8

Borrower Distribution of Consumer Loans										
Assessment Area/Group: MSA 41780										
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	79	23.7	21.6	17.7	18.1	21.5	19.4	20.3	40.9	40.5
Motor Vehicle	101	30.3	21.6	27.7	18.1	28.7	19.4	23.8	40.9	18.8
Other - Secured	59	17.7	21.6	40.7	18.1	33.9	19.4	16.9	40.9	8.5
Other - Unsecured	94	28.2	21.6	36.2	18.1	28.7	19.4	24.5	40.9	10.6

North Central Ohio Nonmetropolitan Area

Geographic Distribution of Small Loans to Businesses and Farms Assessment Area/Group: North Central NonMSA OH								
	Total Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans
Small Business	126	75.4	1.9	0.0	86.3	87.3	11.8	12.7
Small Farm	41	24.6	0.7	0.0	76.2	90.2	23.1	9.8

Borrower Distribution of Small Loans to Businesses and Farms Assessment Area/Group: North Central NonMSA OH							
	Total Loans		Businesses/Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses/ Farms	% Bank Loans	\$100,000 or Less	>\$100,001 to \$250,000	>\$250,001 to \$1,000,000
Small Business	126	75.4	88.7	63.5	71.4	14.3	14.3
Small Farm	41	24.6	98.9	92.7	90.2	9.8	0.0

Geographic Distribution of HMDA Loans Assessment Area/Group: North Central NonMSA OH								
	Total HMDA Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans
Home Purchase	14	21.9	3.0	0.0	82.3	92.9	14.8	7.1
Refinance	39	60.9	3.0	0.0	82.3	84.6	14.8	15.4
Home Improvement	11	17.2	3.0	0.0	82.3	90.9	14.8	9.1

Borrower Distribution of HMDA Loans Assessment Area/Group: North Central NonMSA OH										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans
Home Purchase	14	21.9	15.5	14.3	19.4	35.7	24.8	21.4	40.2	28.6
Refinance	39	60.9	15.5	17.9	19.4	15.4	24.8	17.9	40.2	30.8
Home Improvement	11	17.2	15.5	9.1	19.4	45.5	24.8	9.1	40.2	27.3

Geographic Distribution of Consumer Loans								
Assessment Area/Group: North Central NonMSA OH								
	Total Consumer Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	27	10.2	3.7	0.0	83.4	92.6	12.9	7.4
Motor Vehicle	50	18.9	3.7	0.0	83.4	88.0	12.9	12.0
Other - Secured	45	17.0	3.7	0.0	83.4	86.7	12.9	13.3
Other - Unsecured	142	53.8	3.7	0.0	83.4	81.0	12.9	19.0

Borrower Distribution of Consumer Loans										
Assessment Area/Group: North Central NonMSA OH										
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	27	10.2	19.3	14.8	16.8	3.7	21.4	33.3	42.5	44.4
Motor Vehicle	50	18.9	19.3	22.0	16.8	42.0	21.4	18.0	42.5	18.0
Other - Secured	45	17.0	19.3	17.8	16.8	40.0	21.4	24.4	42.5	15.6
Other - Unsecured	142	53.8	19.3	21.1	16.8	40.1	21.4	22.5	42.5	14.1

Mansfield, Ohio MSA 31900

Geographic Distribution of Small Loans to Businesses and Farms										
Assessment Area/Group: MSA 31900										
	Total Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans
Small Business	109	71.7	3.5	0.9	23.4	2.8	45.0	81.7	28.1	14.7
Small Farm	43	28.3	0.0	0.0	0.5	0.0	76.0	90.7	23.5	9.3

Borrower Distribution of Small Loans to Businesses and Farms										
Assessment Area/Group: MSA 31900										
	Total Loans		Businesses/Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size					
	#	% of Total	% of Businesses/ Farms	% Bank Loans	\$100,000 or Less	>\$100,001 to \$250,000	>\$250,001 to \$1,000,000			
Small Business	109	71.7	89.5	82.6	84.4	13.8	1.8			
Small Farm	43	28.3	99.5	93.0	90.7	7.0	2.3			

Geographic Distribution of HMDA Loans										
Assessment Area/Group: MSA 31900										
	Total HMDA Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans
Home Purchase	12	25.0	0.2	0.0	15.4	0.0	54.6	91.7	29.9	8.3
Refinance	22	45.8	0.2	0.0	15.4	0.0	54.6	86.4	29.9	13.6
Home Improvement	14	29.2	0.2	7.1	15.4	14.3	54.6	71.4	29.9	7.1

Borrower Distribution of HMDA Loans										
Assessment Area/Group: MSA 31900										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans
Home Purchase	12	25.0	17.9	8.3	19.5	41.7	23.5	25.0	39.1	8.3
Refinance	22	45.8	17.9	18.2	19.5	18.2	23.5	27.3	39.1	36.4
Home Improvement	14	29.2	17.9	14.3	19.5	21.4	23.5	28.6	39.1	28.6

Geographic Distribution of Consumer Loans										
Assessment Area/Group: MSA 31900										
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	13	10.1	0.4	0.0	19.8	0.0	53.1	100.0	26.7	0.0
Motor Vehicle	41	31.8	0.4	0.0	19.8	7.3	53.1	90.2	26.7	2.4
Other - Secured	34	26.4	0.4	0.0	19.8	2.9	53.1	91.2	26.7	5.9
Other - Unsecured	41	31.8	0.4	0.0	19.8	0.0	53.1	97.6	26.7	2.4

Borrower Distribution of Consumer Loans										
Assessment Area/Group: MSA 31900										
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	13	10.1	22.5	7.7	17.0	53.8	20.3	7.7	40.2	30.8
Motor Vehicle	41	31.8	22.5	24.4	17.0	24.4	20.3	31.7	40.2	19.5
Other - Secured	34	26.4	22.5	26.5	17.0	58.8	20.3	11.8	40.2	2.9
Other - Unsecured	41	31.8	22.5	26.8	17.0	36.6	20.3	24.4	40.2	12.2

West Central Ohio Nonmetropolitan Area

Geographic Distribution of Small Loans to Businesses and Farms Assessment Area/Group: West Central NonMSA OH								
	Total Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans
Small Business	71	56.3	9.5	7.0	63.2	57.7	27.3	35.2
Small Farm	55	43.7	2.4	0.0	55.9	29.1	41.7	70.9

Borrower Distribution of Small Loans to Businesses and Farms Assessment Area/Group: West Central NonMSA OH							
	Total Loans		Businesses/Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses/ Farms	% Bank Loans	\$100,000 or Less	>\$100,001 to \$250,000	>\$250,001 to \$1,000,000
Small Business	71	56.3	89.5	70.4	80.3	12.7	7.0
Small Farm	55	43.7	98.7	94.5	78.2	10.9	10.9

Geographic Distribution of HMDA Loans Assessment Area/Group: West Central NonMSA OH								
	Total HMDA Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans
Home Purchase	10	25.6	8.2	0.0	55.7	70.0	36.1	30.0
Refinance	24	61.5	8.2	29.2	55.7	37.5	36.1	33.3
Home Improvement	5	12.8	8.2	0.0	55.7	80.0	36.1	20.0

Borrower Distribution of HMDA Loans Assessment Area/Group: West Central NonMSA OH										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans
Home Purchase	10	25.6	13.8	20.0	17.0	30.0	23.5	10.0	45.7	40.0
Refinance	24	61.5	13.8	8.3	17.0	29.2	23.5	33.3	45.7	29.2
Home Improvement	5	12.8	13.8	0.0	17.0	40.0	23.5	20.0	45.7	20.0

Geographic Distribution of Consumer Loans								
Assessment Area/Group: West Central NonMSA OH								
	Total Consumer Loans		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	14	12.8	10.7	7.1	56.4	78.6	32.9	14.3
Motor Vehicle	37	33.9	10.7	8.1	56.4	56.8	32.9	35.1
Other - Secured	21	19.3	10.7	0.0	56.4	90.5	32.9	9.5
Other - Unsecured	37	33.9	10.7	13.5	56.4	56.8	32.9	29.7

Borrower Distribution of Consumer Loans										
Assessment Area/Group: West Central NonMSA OH										
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	14	12.8	18.2	28.6	14.3	28.6	19.9	14.3	47.6	28.6
Motor Vehicle	37	33.9	18.2	13.5	14.3	35.1	19.9	21.6	47.6	29.7
Other - Secured	21	19.3	18.2	38.1	14.3	33.3	19.9	19.0	47.6	4.8
Other - Unsecured	37	33.9	18.2	32.4	14.3	24.3	19.9	16.2	47.6	27.0

Columbus, Ohio MSA 18140

Geographic Distribution of Small Loans to Businesses and Farms						
Assessment Area/Group: MSA 18140						
	Total Loans		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans
Small Business	11	91.7	33.5	36.4	66.5	63.6
Small Farm	1	8.3	55.7	0.0	44.3	100.0

Borrower Distribution of Small Loans to Businesses and Farms							
Assessment Area/Group: MSA 18140							
	Total Loans		Businesses/Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses/ Farms	% Bank Loans	\$100,000 or Less	>\$100,001 to \$250,000	>\$250,001 to \$1,000,000
Small Business	11	91.7	88.3	54.5	54.5	36.4	9.1
Small Farm	1	8.3	99.2	0.0	0.0	100.0	0.0

Geographic Distribution of HMDA Loans Assessment Area/Group: MSA 18140						
	Total HMDA Loans		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans
Home Purchase	4	50.0	30.2	25.0	69.8	75.0
Refinance	3	37.5	30.2	33.3	69.8	66.7
Home Improvement	1	12.5	30.2	100.0	69.8	0.0

Borrower Distribution of HMDA Loans Assessment Area/Group: MSA 18140										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans
Home Purchase	4	50.0	7.6	25.0	11.3	25.0	21.8	25.0	59.4	25.0
Refinance	3	37.5	7.6	0.0	11.3	33.3	21.8	33.3	59.4	33.3
Home Improvement	1	12.5	7.6	0.0	11.3	0.0	21.8	0.0	59.4	100.0

Geographic Distribution of Consumer Loans Assessment Area/Group: MSA 18140						
	Total Consumer Loans		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	1	7.1	36.1	0.0	63.9	100.0
Motor Vehicle	8	57.1	36.1	62.5	63.9	37.5
Other - Secured	4	28.6	36.1	75.0	63.9	25.0
Other - Unsecured	1	7.1	36.1	0.0	63.9	100.0

Borrower Distribution of Consumer Loans Assessment Area/Group: MSA 18140										
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	1	7.1	9.4	0.0	11.4	0.0	18.2	0.0	61.0	100.0
Motor Vehicle	8	57.1	9.4	0.0	11.4	25.0	18.2	25.0	61.0	50.0
Other - Secured	4	28.6	9.4	50.0	11.4	0.0	18.2	25.0	61.0	25.0
Other - Unsecured	1	7.1	9.4	0.0	11.4	0.0	18.2	0.0	61.0	100.0

Toledo, Ohio MSA 45780

There are no geographic tables for this assessment area because it consists entirely of middle-income census tracts.

Borrower Distribution of Small Loans to Businesses and Farms							
Assessment Area/Group: MSA 45780							
	Total Loans		Businesses/Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses/Farms	% Bank Loans	\$100,000 or Less	>\$100,001 to \$250,000	>\$250,001 to \$1,000,000
Small Business	22	100.0	89.8	63.6	72.7	18.2	9.1
Small Farm	0	0.0	100.0	0.0	0.0	0.0	0.0

Borrower Distribution of HMDA Loans										
Assessment Area/Group: MSA 45780										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans
Home Purchase	7	38.9	17.8	0.0	20.2	0.0	25.8	28.6	36.2	42.9
Refinance	10	55.6	17.8	0.0	20.2	20.0	25.8	10.0	36.2	60.0
Home Improvement	1	5.6	17.8	0.0	20.2	0.0	25.8	0.0	36.2	100.0

Borrower Distribution of Consumer Loans										
Assessment Area/Group: MSA 45780										
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	1	11.1	19.8	0.0	19.2	0.0	20.3	0.0	40.7	100.0
Motor Vehicle	5	55.6	19.8	40.0	19.2	20.0	20.3	20.0	40.7	20.0
Other - Secured	1	11.1	19.8	0.0	19.2	0.0	20.3	0.0	40.7	100.0
Other - Unsecured	2	22.2	19.8	0.0	19.2	0.0	20.3	100.0	40.7	0.0

Akron, Ohio MSA 10420

Geographic Distribution of Small Loans to Businesses and Farms						
Assessment Area/Group: MSA 10420						
	Total Loans		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses/ Farms	% Bank Loans	% of Businesses/ Farms	% Bank Loans
Small Business	7	100.0	25.4	0.0	74.6	100.0
Small Farm	0	0.0	20.0	0.0	80.0	0.0

Borrower Distribution of Small Loans to Businesses and Farms							
Assessment Area/Group: MSA 10420							
	Total Loans		Businesses/Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses/ Farms	% Bank Loans	\$100,000 or Less	>\$100,001 to \$250,000	>\$250,001 to \$1,000,000
Small Business	7	100.0	87.2	28.6	57.1	28.6	14.3
Small Farm	0	0.0	100.0	0.0	0.0	0.0	0.0

Geographic Distribution of HMDA Loans						
Assessment Area/Group: MSA 10420						
	Total HMDA Loans		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% Bank Loans	% of Owner Occ Units	% Bank Loans
Home Purchase	1	33.3	35.9	0.0	64.1	100.0
Refinance	2	66.7	35.9	0.0	64.1	100.0
Home Improvement	0	0.0	35.9	0.0	64.1	0.0

Borrower Distribution of HMDA Loans										
Assessment Area/Group: MSA 10420										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans	% of Families	% Bank Loans
Home Purchase	1	33.3	11.4	0.0	13.4	0.0	18.8	0.0	56.5	100.0
Refinance	2	66.7	11.4	0.0	13.4	0.0	18.8	0.0	56.5	100.0
Home Improvement	0	0.0	11.4	0.0	13.4	0.0	18.8	0.0	56.5	0.0

Geographic Distribution of Consumer Loans						
Assessment Area/Group: MSA 10420						
	Total Consumer Loans		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	1	33.3	41.3	0.0	58.7	100.0
Motor Vehicle	1	33.3	41.3	0.0	58.7	100.0
Other - Secured	1	33.3	41.3	0.0	58.7	100.0
Other - Unsecured	0	0.0	41.3	0.0	58.7	0.0

Borrower Distribution of Consumer Loans										
Assessment Area/Group: MSA 10420										
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Home Equity	1	33.3	15.0	0.0	13.6	0.0	16.4	0.0	55.0	100.0
Motor Vehicle	1	33.3	15.0	0.0	13.6	0.0	16.4	0.0	55.0	100.0
Other - Secured	1	33.3	15.0	0.0	13.6	0.0	16.4	100.0	55.0	0.0
Other - Unsecured	0	0.0	15.0	0.0	13.6	0.0	16.4	0.0	55.0	0.0

APPENDIX C

GLOSSARY

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

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

Community development: 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.