

PUBLIC DISCLOSURE

September 6, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Ohio Heritage Bank
200 Main Street
Coshocton, Ohio 43812
RSSD #2347044

Federal Reserve Bank of Cleveland

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the 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.

TABLE OF CONTENTS

Institution Rating

a. Overall Rating	1
b. Scope of Examination	2
c. Description of Institution	4
d. Description of Assessment Area	6
e. Conclusions with Respect to Performance Tests	10

Nonmetropolitan Ohio Area (reviewed using full-scope review)

a. Description of Institution's Operations	13
b. Conclusions with Respect to Performance Tests	21

Columbus Metropolitan Statistical Area 18140 (reviewed using limited-scope review)

a. Description of Institution's Operations	27
b. Conclusions with Respect to Performance Tests	29

Appendices

a. Assessment Area Map.....	30
b. Core Tables	31
c. Glossary of Terms	43

INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: "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 majority of loans and other lending-related activities are in the assessment area;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area;
- There is a reasonable penetration among individuals of different income (including low- and moderate-income individuals) levels and an excellent penetration among businesses of different sizes; and,
- There were no CRA-related complaints were received about the institution's performance in meeting the assessment area credit needs

The bank was rated "Satisfactory" at the previous CRA evaluation dated July 23, 2007.

SCOPE OF EXAMINATION

Ohio Heritage Bank (Ohio Heritage) was evaluated using the Interagency Small Bank Examination procedures. Under this examination method, the bank's lending activity within its assessment area was evaluated, including the distribution of lending to borrowers of different income categories and businesses of different revenues sizes. Ohio Heritage's CRA performance was evaluated based on lending data from January 1, 2010 through December 31, 2010.

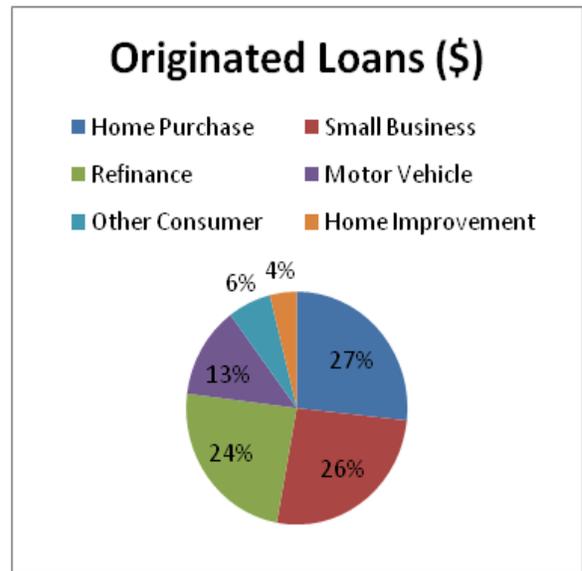
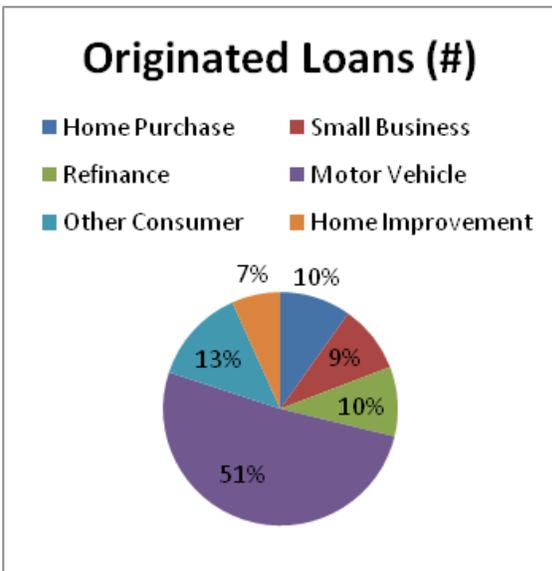
Ohio Heritage delineated two assessment areas for CRA purposes. The nonmetropolitan area is comprised of the entireties of Coshocton, Knox, and Tuscarawas counties. The Columbus Metropolitan Statistical Area 18140 (MSA) is comprised of a portion of the MSA consisting of the entirety of Licking County. A detailed description of each assessment area is presented in subsequent sections of this performance evaluation.

The loan products evaluated include mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), consumer loans, and small business loans. HMDA loans are comprised of home purchase, refinance, and home improvement loans. Consumer loans are comprised of motor vehicle, home equity lines of credit, and other secured and unsecured loans. In the nonmetropolitan area, there was sufficient volume to evaluate the bank's lending; therefore, a full scope evaluation was completed. The Columbus MSA, which only includes Licking County, had limited lending during this review period. Since there were not enough loans to perform a meaningful analysis, a limited scope evaluation was conducted to ensure consistency within this assessment area.

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

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

Loan Type	Number of Loans	Dollar Amount of Loans (000's)
Home Purchase	77	\$8,373
Small Business	74	\$8,206
Refinance	76	\$7,563
Motor Vehicle	404	\$4,017
Other Consumer	104	\$1,973
Home Improvement	53	\$1,222
Total Loans	788	\$31,354



Given the above distribution, HMDA lending received the greatest weight in this analysis because these loans comprise 26.0% of the loans originated by number and 55.0% by dollar volume during this evaluation period, followed by consumer lending (65.0% number, 19% dollar volume) and small business lending (9.0% number, 26% dollar volume).

For the purpose of this evaluation, Ohio Heritage's distribution of lending to borrowers of different income levels and businesses of different revenue sizes was weighted more heavily than the geographic dispersion of lending due to the limited number of low- and moderate-income geographies within the bank's market. During this evaluation period, 87.4% of the institution's lending activity occurred within the nonmetropolitan area. This assessment area has no low-income geographies and only five of the 15 moderate-income geographies within the bank's overall CRA footprint.

DESCRIPTION OF INSTITUTION

The financial holding company, Ohio Heritage Bancorp, Inc., owns Ohio Heritage Bank and Coshocton County Title Agency, LLC. In addition, Ohio Heritage Bank owns Ohio Heritage Financial Services, which offers full-service securities brokerage and insurance products. All of these entities are located in Coshocton, Ohio.

According to the June 30, 2011 Uniform Bank Performance Report (UBPR), Ohio Heritage has total assets of \$274.8 million, a 31.6% increase from the \$208.9 million since the previous CRA evaluation in July 2007.

Ohio Heritage serves its assessment area through one main office and five branch offices. In Coshocton, the main office and one branch office (each with a full-service ATM) are located in Coshocton County. Ohio Heritage also has two branch offices with full-service ATMs in Licking County (Newark and Heath) and one office in Knox County (Mount Vernon). Ohio Heritage also has a branch office in Tuscarawas County (New Philadelphia) that does not have a full-service ATM. Since the previous evaluation, the bank opened a new branch office in Heath, Ohio in 2009 and added deposit services to a former loan production office in New Philadelphia, Ohio. Ohio Heritage has not closed any branches since the previous evaluation.

Ohio Heritage is a full-service retail bank offering business and consumer deposit accounts and commercial, residential mortgage, and consumer loans. As of June 30, 2011, Ohio Heritage had \$187 million in net loans and leases, which represents 68.0% of the bank's total assets. The following table demonstrates the bank's loan portfolio composition as of June 30, 2011:

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2011		12/31/2010		12/31/2009	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	6,301	3.3%	6,908	3.5%	6,738	3.4%
Secured by One- to Four- Family Dwellings	135,236	71.5%	134,675	69.2%	135,241	68.3%
Other Real Estate: Farmland	591	0.3%	495	0.3%	553	0.3%
Multifamily	2,851	1.5%	5,963	3.1%	5,350	2.7%
Nonfarm nonresidential	21,789	11.5%	22,991	11.8%	25,197	12.7%
Commercial and Industrial	9,655	5.1%	10,250	5.3%	10,989	5.5%
Loans to Individuals	12,671	6.7%	13,301	6.8%	13,916	7.0%
Agricultural Loans	88	0.0%	66	0.0%	68	0.0%
Total	\$189,182	100.00%	\$194,649	100.00%	\$198,052	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.

Ohio Heritage's investment portfolio as of June 30, 2011 was \$62.9 million, which represents 22.9% of total assets. Investments in interest-bearing bank balances account for 42.9%, U.S. Treasuries and Agencies account for 33.7%, and federal funds sold account for 18.8% of investments, while municipal securities comprise the remaining 4.6% of the bank's total investment

In addition, Ohio Heritage offers lower-income individuals the opportunity to participate in the Federal Home Loan Bank's (FHLB), Welcome Home Grant program, which provides down payment assistance for first-time, low- and moderate-income homebuyers. Through this program, Ohio Heritage obtained seven grants aggregating \$35,000 during this review period.

Ohio Heritage Bank also is a participant in the USDA Rural Development Housing program, which assists low- and moderate-income individuals to purchase homes in rural areas. Funds can be used to build, repair, renovate, or relocate a home or purchase and prepare sites, including providing water and sewage facilities. Through this program, Ohio Heritage obtained 20 loans aggregating \$1.8 million during this review period.

Further, the bank participated in a match-funding loan program for fixed-rate mortgage loans, which had an impact on the bank's loan-to-deposit ratio discussed later in this evaluation.

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

DESCRIPTION OF ASSESSMENT AREA

Ohio Heritage's footprint includes four counties within the state of Ohio and delineates the following two assessment areas for the purposes of CRA:

- Nonmetropolitan Ohio Area comprised of the entireties of Coshocton, Knox, and Tuscarawas Counties.
- Columbus Ohio Metropolitan Statistical Area 18140 comprised only of the entirety of Licking County.

The overall assessment area consists of 72 total census tracts, of which one is designated as low-income (1.4%), 15 are moderate-income (20.8%), 46 are middle-income (63.9%), and ten (13.9%) are upper-income tracts. None of the bank's middle-income census tracts were considered distressed/underserved during this evaluation period. Since the previous evaluation, the bank's CRA footprint has not changed.

There is a significant amount of competition throughout the bank's overall CRA assessment area from both large- and peer-sized banks. According to the FDIC Deposit Market Share Report,¹ as of June 30, 2010, Ohio Heritage's market share of deposits accounts for 4.36% of the market and ranks fifth (operating six offices) out of 27 institutions operating 122 offices in the counties included in the bank's assessment area. The following top four institutions, Park National Bank, Huntington National Bank, PNC Bank NA, and JPMorgan Chase Bank NA, hold a combined 66.9% market share and account for 49.2% of the offices within this market. In addition, Ohio Heritage also competes with several peer banks, including First Federal Community Bank, First National Bank of Dennison, First Federal Savings & Loan Association, and Home Loan Savings Bank. These peer banks hold a combined 13.5% of market share and account for 14.8% of the offices within this market.

Population Characteristics

According to the 2000 U.S. Census, the total population within Ohio Heritage's overall assessment area was 327,560 people. Less than 1.0% lives in low-income geographies and 19.3% of the population lives in moderate-income geographies. In addition, 74.3% of the population is 18 years of age or older, which is the legal age to enter into a contract.

The following table illustrates the projected population by county in Ohio Heritage's assessment area and how it is expected to change over the next 20 years. This information was obtained from the Ohio Department of Development's Office of Policy, Research and Strategic Planning.²

1 FDIC/OTS Summary of Deposits Website: www.fdic.gov

2 www.development.ohio.gov/research/CountyTrends.htm

County	Actual Population 2000	Actual Population 2010	Projected Population 2020	Projected Population 2030
Coshocton	36,655	36,901	37,700	37,610
Knox	54,500	60,921	65,940	69,890
Tuscarawas	90,914	92,582	96,080	98,220
Licking	145,491	166,492	179,050	198,760

As demonstrated above, each of the county’s populations is projected to increase over the next 20 years, with the largest increases projected for Licking County at 19.4% and Knox County at 14.7%.

Income Characteristics

According to 2000 U.S. Census data, the median family income in the bank’s overall assessment area was \$46,544, compared to Ohio’s median family income at \$50,037. Low- and moderate-income families represent approximately 18.3% and 20.2%, respectively, of all families in the assessment area. In the bank’s assessment area, 6.4% of families were below the poverty level, compared to Ohio’s rate at 7.8%.

According to HUD’s³ estimated median family income for 2010, Ohio’s nonmetropolitan area income increased to \$53,700, and the Columbus MSA’s median family income increased to \$68,600. Median family incomes for respective counties within the bank’s assessment are discussed in subsequent sections of this performance evaluation.

In the overall assessment area, there are 125,525 households, of which 90,339 (72.0%) are designated as families. Of these households, 8.9% were below the poverty level, compared to Ohio’s rate at 10.7%. Poverty rates for respective counties within the bank’s assessment area are reflected in the Assessment Area Demographic tables within this performance evaluation.

Housing Characteristics

Based on the 2000 U.S. Census⁴, there were 134,773 housing units in the overall assessment area, with the majority of units (58,760) or 43.6% located in Licking County. Within the assessment area, 69.9% of the units were owner-occupied, 23.3% were rental units, 5.7% were multi-family, 8.5% were mobile homes, and 6.8% were vacant. The owner-occupancy rate was about the same in each county compared to the overall assessment area. From an income perspective, less than 1.0% of housing units and owner-occupied homes were located in the low-income census tract, compared to 20.6% of housing units and 16.9% of owner-occupied homes located in moderate-income census tracts. These figures suggest mortgage credit demand may be lower in moderate-income areas and extremely low in low-income areas compared to the potential demand in middle- and upper-income areas.

3 www.huduser.org

4 www.census.gov

The median age of housing stock was 36 years as of the 2000 U.S. Census, with 33.4% of housing built prior to 1950. Older homes such as these are typically more likely to require repairs and rehabilitation.

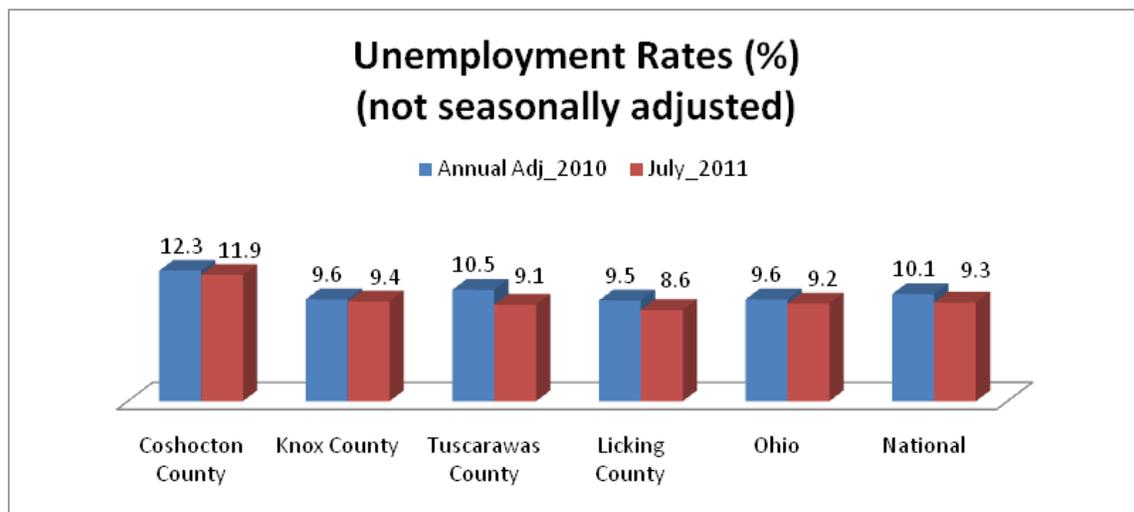
According to the 2000 U.S. Census data, the median housing value in the assessment area was \$95,165 with an affordability ratio of 41.0%, as the higher the affordability ratio, the more affordable a home is considered. Affordability ratios fluctuated from 45.0% in Coshocton County to 39.0% in Licking County.

From a rental perspective, the median gross rent in the assessment area was \$464, with 22.0% of the rental units having rents of less than \$350 a month. The majority of rents (30.5%) in the assessment area were \$350 to less than \$500 per month. The remaining rents were \$500-\$699 or greater than \$700 at 27.5% and 9.5%, respectively. Additionally, only 28.7% of renters have rent costs greater than 30.0% of their income.

Labor, Employment, and Economic Characteristics

Based on 2010 Dun and Bradstreet business demographics,⁵ administrative support services; other services; retail trade; professional services; construction; and agriculture, forestry, and fishing were the leading employment sectors within the bank's overall CRA footprint.

The following chart outlines the unemployment rate by county in the bank's assessment area, according to the Ohio Department of Job and Family Services⁶:



Specifics regarding major employers, other labor, and economic characteristics are discussed in subsequent sections of this performance evaluation.

⁵The number of businesses and percent of small businesses discussed here differs slightly from the number and percentage listed in the Combine Demographics Report, because the information in the report is based on 2000 Census data

⁶ www.jfs.ohio.gov

Assessment Area Demographics

Assessment Area: Overall

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	1.4	169	0.2	63	37.3	16,550	18.3
Moderate-income	15	20.8	16,790	18.6	1,862	11.1	18,284	20.2
Middle-income	46	63.9	60,999	67.5	3,546	5.8	22,729	25.2
Upper-income	10	13.9	12,381	13.7	339	2.7	32,776	36.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	72	100.0	90,339	100.0	5,810	6.4	90,339	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	595	78	0.1	13.1	428	71.9	89	15.0
Moderate-income	27,752	15,921	16.9	57.4	9,590	34.6	2,241	8.1
Middle-income	89,469	64,829	68.8	72.5	18,480	20.7	6,160	6.9
Upper-income	16,957	13,333	14.2	78.6	2,934	17.3	690	4.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	134,773	94,161	100.0	69.9	31,432	23.3	9,180	6.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	375	2.6	327	2.5	26	3.5	22	3.1
Moderate-income	2,589	17.7	2,288	17.4	153	20.4	148	20.9
Middle-income	9,659	66.1	8,692	66.1	501	66.9	466	65.9
Upper-income	1,991	13.6	1,851	14.1	69	9.2	71	10.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	14,614	100.0	13,158	100.0	749	100.0	707	100.0
	Percentage of Total Businesses:			90.0		5.1		4.8

Based on 2000 Census Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Loan-to-Deposit Ratio

A financial institution's loan-to-deposit ratio (LTD) compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution's lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing by the total number of quarters. Compared below is Ohio Heritage's LTD ratio to both the bank's aggregate peer group, consisting of all insured commercial banks having assets between \$300 and \$1 billion, and three local peer banks selected from the Deposit Market Share Report.

Ohio Heritage's average LTD ratio was 116.5% over the past 17 quarters since the previous evaluation, which is significantly greater than the aggregate of all lenders' average ratio of 78.5%. However, bank management attributes the higher LTD ratio to its participation in a match-funding loan program for fixed-rate mortgage loans. During this timeframe, the bank's LTD ratio averaged about 125.0%. From December 2009 to March 2010, the LTD ratio decreased by 9.5%, as Ohio Heritage discontinued its participation in this program. Since March 31, 2010, the bank's LTD ratio has averaged 100.8%.

The following table illustrates Ohio Heritage's quarterly LTD ratios since the previous evaluation with the average LTD ratio for the bank and the peer.

Loan-to-Deposit Ratios				
As of Date	Net Loans (000s)	Total Deposits (000s)	Bank Ratio	Peer Ratio
June 30, 2011	186,576	185,703	100.47	73.08
March 31, 2011	188,738	186,136	101.40	72.09
December 31, 2010	192,020	194,780	98.58	74.81
September 30, 2010	194,859	194,118	100.38	76.62
June 30, 2010	194,315	189,985	102.28	77.16
March 31, 2010	193,336	189,990	101.76	76.43
December 31, 2009	195,660	174,051	112.42	77.60
September 30, 2009	195,318	164,112	119.02	79.81
June 30, 2009	192,497	155,591	123.72	80.12
March 31, 2009	190,303	154,120	123.48	79.33
December 31, 2008	192,768	149,657	128.81	81.99
September 30, 2008	189,995	145,179	130.87	82.88
June 30, 2008	187,764	145,383	129.15	81.25
March 31, 2008	184,825	144,543	127.87	79.55
December 31, 2007	181,392	142,041	127.70	80.63
September 30, 2007	176,344	138,340	127.47	81.11
June 30, 2007	171,095	137,006	124.88	80.63
Quarterly Loan-to-Deposit Ratio Average Since Previous Evaluation			116.49	78.53

Ohio Heritage's LTD ratio was also compared to the following local peer banks: First Federal Community Bank, headquartered in Dover, Ohio; First National Bank of Dennison, headquartered in Dennison, Ohio; and Home Loan Savings Bank, headquartered in Coshocton, Ohio. Ohio Heritage and the three local peer banks are similarly situated in regards to percentage of market share ranging from a high of 4.4% for Ohio Heritage to a low of 2.9% for Home Loan Savings Bank. Focusing on the last six quarters, it appears Ohio Heritage is mirroring First Federal's and Home Loan Savings' ratios.

Institution Name	RSSD ID	# of Branches	Financial Information As of June 30, 2011		
			Total Assets	Net Loans and Leases	Total Deposits
Ohio Heritage	2347044	6	\$274,796	\$186,576	\$185,703
First Federal Community	540775	4	\$219,520	\$182,686	\$186,006
First NB of Dennison	935719	5	\$184,097	\$98,249	\$164,744
Home Loan Savings	468673	4	\$161,956	\$131,268	\$131,189

As of Date	Ohio Heritage	First Federal Community	First NB of Dennison	Home Loan Savings
June 30, 2011	100.47	98.22	59.64	100.06
March 31, 2011	101.40	102.03	60.16	100.21
December 31, 2010	98.58	103.72	64.10	100.83
September 30, 2010	100.38	106.07	65.49	102.11
June 30, 2010	102.28	104.79	66.97	103.67
March 31, 2010	101.76	107.29	67.97	105.93
December 31, 2009	112.42	103.12	69.93	119.42
September 30, 2009	119.02	103.01	72.23	118.87
June 30, 2009	123.72	104.90	71.71	120.07
March 31, 2009	123.48	105.38	70.74	125.22
December 31, 2008	128.81	108.67	72.75	129.45
September 30, 2008	130.87	115.05	67.83	126.38
June 30, 2008	129.15	110.20	68.17	122.37
March 31, 2008	127.87	113.45	66.35	118.80
December 31, 2007	127.70	113.17	67.87	118.25
September 30, 2007	127.47	113.27	66.62	117.55
June 30, 2007	124.88	109.91	70.10	112.94
Quarterly LTD Average Ratio	116.49	107.19	67.57	114.24

Therefore, considering the bank's lending-related activity, size, financial condition, and assessment area credit needs, Ohio Heritage's LTD ratio is considered reasonable.

Lending in the Assessment Area

The bank's HMDA lending, consumer lending, and small business lending was analyzed to determine the volume of lending inside and outside the bank's assessment area. Of the bank's total loans, 82.9% by volume and 85.7% by dollar amount were made inside the assessment area.

The following table illustrates the percentage of loans made inside and outside the bank's assessment area.

Lending Inside and Outside the Assessment Area

Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Consumer	104	90.4	\$1,973	90.3	11	9.6	\$212	9.7
Motor Vehicle	404	78.1	\$4,017	77.6	113	21.9	\$1,159	22.4
Total Consumer related	508	80.4	\$5,990	81.4	124	19.6	\$1,371	18.6
Home Improvement	53	96.4	\$1,222	95.5	2	3.6	\$57	4.5
Home Purchase	77	87.5	\$8,373	87.6	11	12.5	\$1,185	12.4
Refinancing	76	98.7	\$7,563	92.9	1	1.3	\$580	7.1
Total HMDA related	206	93.6	\$17,158	90.4	14	6.4	\$1,822	9.6
Small Business	74	75.5	\$8,206	80.2	24	24.5	\$2,027	19.8
Total Small Bus. related	74	75.5	\$8,206	80.2	24	24.5	\$2,027	19.8
TOTAL LOANS	788	82.9	\$31,354	85.7	162	17.1	\$5,220	14.3

A majority of the bank's loans by both volume and dollar amount were made inside its assessment area.

Geographic Distribution of Lending

Ohio Heritage's geographic distribution of lending is considered reasonable throughout the overall assessment area, reflecting the bank's lending performance in all assessment areas in conjunction with the demographics of the areas. The respective analysis can be found within subsequent sections of this report.

Borrower Distribution of Lending

Ohio Heritage's lending to borrowers of different income categories and lending to businesses of different revenue sizes is considered reasonable. This reflects the bank's performance in all assessment areas in comparison to the demographic data. The respective analysis can be found within subsequent sections of this report.

Response to Consumer Complaints

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

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.

NONMETROPOLITAN ASSESSMENT AREA
(Full-scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
NONMETROPOLITAN OHIO AREA**

The nonmetropolitan Ohio assessment area consists of the entireties of Coshocton, Knox, and Tuscarawas counties. This assessment area is comprised of 41 total census tracts, of which none is designated as low-income, five are (12.2%) moderate-income, 31 are (75.6%) middle-income, and five are (12.2%) upper-income tracts.

Ohio Heritage serves this assessment area through its main office and three branch offices. The main office and one branch office in Coshocton, Ohio⁷ are both located in moderate-income census tracts. The branch office in Mount Vernon, Ohio is located in a middle-income census tract. The branch office in New Philadelphia, Ohio is located in an upper-income census tract and this is the only office without a full-service ATM.

Coshocton County is located in eastern-central Ohio. The city of Coshocton is the largest city and county seat. The Coshocton Micropolitan Statistical Area includes all of Coshocton County.

Knox County is also located in eastern-central Ohio. The city of Mount Vernon is the county seat and the largest city. The Mount Vernon Micropolitan Statistical Area includes all of Knox County.

Tuscarawas County is located in the eastern part of Ohio. The city of New Philadelphia is the largest city and the county seat. The New Philadelphia-Dover Micropolitan Statistical Area includes all of Tuscarawas County.

While neighboring Holmes County is home to the largest Amish⁸ settlement in United States, Amish families also reside in Tuscarawas and Coshocton counties to a lesser extent. Consequently, lending opportunities for area financial institutions are somewhat limited, since the Amish do not own automobiles or purchase personal items on credit and have their own means of providing financial assistance to the community. Due to growing interest in the Amish community and its culture, tourism contributes to the area's economy.

According to the FDIC Deposit Market Share Report,⁹ as of June 30, 2010, Ohio Heritage's market share of deposits accounts for 7.0% of the market and ranks sixth, operating four offices out of 22 institutions operating 73 offices in this assessment area. The top five institutions in this market are Park National Bank with 17.0% of the market, Huntington National Bank with 15.3%, PNC Bank NA and JPMorgan Chase Bank NA with 9.8% each, and First Federal Community Bank with 7.2% of the market.

⁷ Coshocton, OH (Coshocton County); Mount Vernon, OH (Knox County); New Philadelphia, OH (Tuscarawas County)

⁸ www.ohioamishcountry.com

⁹ FDIC/OTS Summary of Deposits Website: www.fdic.gov

Three community contacts were conducted in order to provide additional information regarding the assessment area. The community contacts provided context to the demographic and economic characteristics discussed below. The community contacts serve Coshocton, Knox, and Tuscarawas counties.

The community contact in Coshocton County was conducted with a community action council. The contact stated that the negative effects of a weakened economy and high unemployment rates over the past several years have had serious impact on the county's resources. As the financial needs of area residents have been increasing, sources of funding for assistance programs have decreased. As the county and the state decrease funding for public assistance programs, finding other sources of funding will be critical. The contact stated that there are plenty of opportunities for local banks to assist with financial support for local businesses to help retain and create job opportunities and assist with affordable housing and emergency services such as food, clothing, utility bill assistance, and health services.

The community contact in Tuscarawas County was conducted with an economic development organization. The contact indicated that due to increased homelessness in the area, the county recently opened a new homeless shelter. Funds for the shelter were primarily obtained through government sources. The contact went on to state that the majority businesses in the area employ between 20 and 40 individuals and over the last five years the area has not lost any major employers. Through state and federal grants, a technology park and business incubator was recently built and opened. The county is benefiting from the growing opportunities in shale oil and gas exploration and there has been a significant increase in the number of oil and gas leases filed with the county in the past year. Recent estimates indicate that Chesapeake Energy has secured enough leases to drill over 10,000 vertical wells in the region in the next several years. The community contact believes that local banks are willing to assist with credit and that there are opportunities for local banks to participate in county development projects. The contact also stated there is a need for better credit programs for low- and moderate-income borrowers (i.e., down payment assistance for first-time homebuyers), but currently credit standards are so conservative that anyone who qualifies for down-payment assistance would likely not be approved for a loan. However, the contact still thinks these types of programs are worthwhile.

The community contact in Knox County was conducted with a local chamber of commerce. The contact stated that the county has recently experienced a decline in unemployment rates. Several local companies have been expanding and hiring additional staff. Due to the recent economy, the county has seen more individuals starting their own businesses; about 75.0% of the chamber's membership is small local businesses. The community contact indicated the banks in the county are involved in the community and help to sponsor or jointly provide training programs for businesses in the area. Also, local banks actively refer applicants to the chamber for assistance, along with providing financing and assisting business owners obtain financing from available government sources (i.e., SBA and revolving loan funding).

Population Characteristics

According to the 2000 U.S. Census, the total population for this assessment is 182,069, which means that 55.6% of the overall population resides in the nonmetropolitan Ohio area. Approximately, 12.3% of this assessment area's population resides in moderate-income tracts, while 79.3% resides in middle-income and only 8.4% in upper-income tracts. In addition, 74.6% of the population is 18 years of age or older, which is the legal age to enter into a contract.

As stated earlier in the report, Tuscarawas County currently has the largest population in this assessment area, followed by Knox and Coshocton counties, respectively. According to the most recent U.S. Census data, of the three counties in this assessment area, Knox County is projected to have the largest increase in population at 14.7% over the next 20 years.

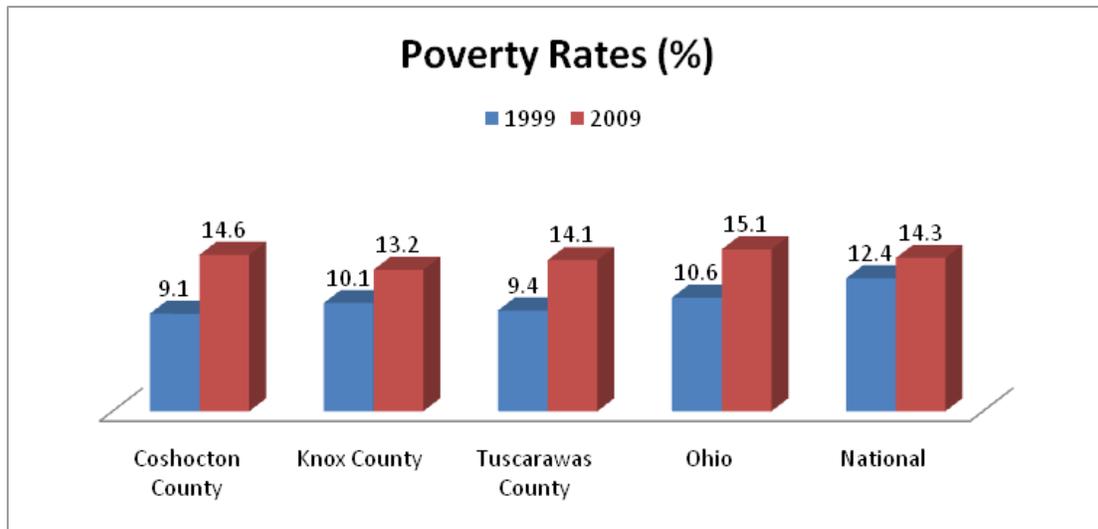
Income Characteristics

According to 2000 Census data, the median family income in this assessment area was lower at \$42,632 compared to the bank's overall assessment area at \$46,544 and Ohio's median family income at \$50,037. Based on HUD's estimated 2010 data, Ohio's median family income in nonmetropolitan Ohio increased to \$53,700. Low- and moderate-income families represent approximately 17.7% and 20.1% of all families in this assessment area, respectively. In this assessment area, 7.2% of families were below the poverty level, compared to Ohio's rate at 7.8%. Of note, approximately 74.8% of the families below the poverty level in this assessment area reside in middle-income geographies.

The assessment area contains 69,937 households, of which 50,081 (71.6%) are designated as families and 9.7% of the households were below the poverty level, compared to Ohio's rate at 10.7%.

Based on 2009 data from the Economic Research Service of the United States Department of Agriculture (USDA),¹⁰ household poverty rates for the counties in the assessment area were as follows:

¹⁰ www.ers.usda.gov/Data/PovertyRates



Labor, Employment, and Economic Characteristics

The following table illustrates land use in each county in the assessment area:¹¹

	Urban	Cropland	Pasture	Forest
Coshocton County	1.5%	19.7%	12.8%	64.9%
Knox County	3.5%	43.7%	12.7%	39.1%
Tuscarawas County	4.8%	20.4%	10.3%	63.4%

There is limited land available for business and residential use in all three counties, which indicates that Ohio Heritage has limited opportunities to make business- and residential-type loans within this assessment area.

Based on 2010 Dun and Bradstreet business demographics,¹² 8,015 businesses were located in the assessment area and of these businesses, 89.8% are small businesses. The top five businesses by revenue include administrative support (14.9%); other services (13.1%); retail (10.4%); construction (10.1%); and agriculture, forestry, and fishing (8.4%). 26.1% of all of the businesses in this assessment area have been in business more than 25 years and 24.9% have been in business from five to nine years.

According to the Ohio Department of Development,¹³ major employers in this assessment area include:

¹¹ www.development.ohio.gov/research

¹²The number of businesses and percent of small businesses discussed here differs slightly from the number and percentage listed in the Combine Demographics Report, because the information in the report is based on 2000 Census data

¹³ www.development.ohio.gov/research/

Coshocton County	AK Steel Holding, American Electric Power, Ansell Limited, Coshocton City Schools, Coshocton County Government, Coshocton County Memorial Hospital, Kraft Foods, Inc., McWane Corporation/Clow Water Systems, Riverview Local Schools, and Smurfit-Stone Container Corp.
Knox County	Ariel Ltd., JELD-WEN Inc., Kenyon College, Knox Community Hospital, Kokosing Construction Co., Mount Vernon Nazarene University, Mount Vernon City Schools, Rolls-Royce plc, Sanoh America, Inc., and State of Ohio
Tuscarawas County	Alamo Group/Gradell Industries, Allied Machine & Engineering, Dover City Schools, New Philadelphia City Schools, Smurfit-Stone Container Corp., Union Hospital, Wal-Mart Stores, Inc., and Zimmer Orthopedic

Average Weekly Wages By Primary Industrial Sector			
	Coshocton County	Knox County	Tuscarawas County
Manufacturing	\$846	\$1,063	\$765
Trade, Transportation, Utilities	\$669	\$466	\$510
Education and Health	\$526	\$664	\$552
Leisure and Hospitality	NA	\$208	\$220
Local Government	\$609	\$655	\$634
Professional and Business	NA	NA	\$615

NA = not a primary industrial sector

As stated earlier, according to the Ohio Department of Job and Family Services, the July 2011 unemployment rate was 11.9% for Coshocton County, 9.4% for Knox County, and 9.1% for Tuscarawas County.

Housing Characteristics

There were 76,013 housing units in this assessment area, based on the 2000 U.S. Census. Within this assessment area, 69.4% of the units were owner-occupied, 22.7% were rental units, 7.9% were vacant, 10.5% were mobile homes, and only 4.1% were multi-family units.

From an income perspective, only 13.6% of total housing units are located in moderate-income census tracts and of these only 11.1% are owner-occupied dwellings. These figures suggest there is limited opportunity for mortgage-type credit in these geographies.

The median age of housing stock was 40 years as of the 2000 U.S. Census, with 38.9% of housing built prior to 1950. Older homes such as these are typically more likely to require repairs and rehabilitation.

According to the 2000 U.S. Census data, the median housing value in the assessment area was \$86,845 with an affordability ratio of 41.0%, as the higher the affordability ratio, the more affordable a home is considered. The affordability ratio in Coshocton, Knox, and Tuscarawas counties was 45.0%, 40.0%, and 41.0%, respectively. Ohio's affordability ratio was 40.0%. Therefore, it appears that Coshocton has the most affordable housing overall and that the affordability ratio for Knox and Tuscarawas counties is comparable to Ohio's.

Further, based on the estimated 2010 median family income for nonmetropolitan Ohio (\$53,700), about 35.8% of the homes valued up to \$87,530 in the assessment area would be considered affordable for low-income individuals and approximately 69.3% of the homes valued up to \$140,000 would be considered affordable for moderate-income individuals. These percentages were calculated assuming an average mortgage payment equal to 28.0% of gross income for a 5.0% fixed-rate, 30-year loan.

According to Sperling's Best Places,¹⁴ the 2010 median home cost provided in the following table demonstrates that housing values have depreciated throughout this assessment area and continued to depreciate over the last year:

Major City in Each County	2010 Home Values	% Appreciation in Last Year
Coshocton (Coshocton)	\$86,600	- 2.65%
Mount Vernon (Knox)	\$97,800	-2.75%
New Philadelphia (Tuscarawas)	\$100,700	-2.68%

According to RealtyTrac,¹⁵ foreclosure filings were reported on 8,376 Ohio properties in July 2011. While Ohio's rate has dropped over the past few years, Ohio still had the nation's ninth highest state overall foreclosure total. One in every 608 Ohio households received a foreclosure notice in July 2011. Tuscarawas County ranks 31st, Knox County ranks 33rd, and Coshocton County ranks 75th in the overall number of foreclosure filings in Ohio. As shown in the table below, Knox County had the highest foreclosure rate in this assessment area as of July 2011:

County Rank by Number of Foreclosures ¹⁶	Number of Foreclosures	Housing Units Received a Foreclosure Filing ¹⁷	Rank by Foreclosure Filing Rate
75. Coshocton	4	1 in 4,035	#3
33. Knox	46	1 in 529	#1
31. Tuscarawas	49	1 in 797	#2

14 www.bestplaces.net

15 www.realtytrac.com/trendcenter/oh-trend.html

16 There are 88 counties in the State of Ohio

17 The foreclosure rate is calculated by dividing the total housing units in the county by the total number of properties that received foreclosure filings during the month and that number is expressed as a ratio (i.e., 1 in 100). The lower the second number in the ratio, the higher the foreclosure rate

From a rental perspective, the median gross rent in this assessment area was \$433, with 25.2% of the rental units having rents of less than \$350 a month, according to the 2000 U.S. Census. The majority of rents (33.2%) in this assessment area were \$350-\$499 per month and 23.6% of rents were \$500-\$699. Slightly less than 5.0% of rents were greater than \$700. Additionally, 27.3% of renters have rent costs greater than 30.0% of their income. Slightly less than 23.0% of housing units are rental units in this assessment area.

Assessment Area Demographics

Assessment Area: OH Non MSA

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	8,852	17.7
Moderate-income	5	12.2	5,960	11.9	752	12.6	10,074	20.1
Middle-income	31	75.6	39,581	79.0	2,700	6.8	12,620	25.2
Upper-income	5	12.2	4,540	9.1	158	3.5	18,535	37.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	41	100.0	50,081	100.0	3,610	7.2	50,081	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	10,321	5,854	11.1	56.7	3,601	34.9	866	8.4
Middle-income	59,144	42,063	79.7	71.1	12,262	20.7	4,819	8.1
Upper-income	6,548	4,847	9.2	74.0	1,357	20.7	344	5.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	76,013	52,764	100.0	69.4	17,220	22.7	6,029	7.9
	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	1,125	14.2	960	13.5	75	16.6	90	22.1
Middle-income	6,224	78.3	5,582	78.7	350	77.6	292	71.7
Upper-income	601	7.6	550	7.8	26	5.8	25	6.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,950	100.0	7,092	100.0	451	100.0	407	100.0
	Percentage of Total Businesses:			89.2		5.7		5.1

Based on 2000 Census Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTING IN NONMETROPOLITAN OHIO AREA

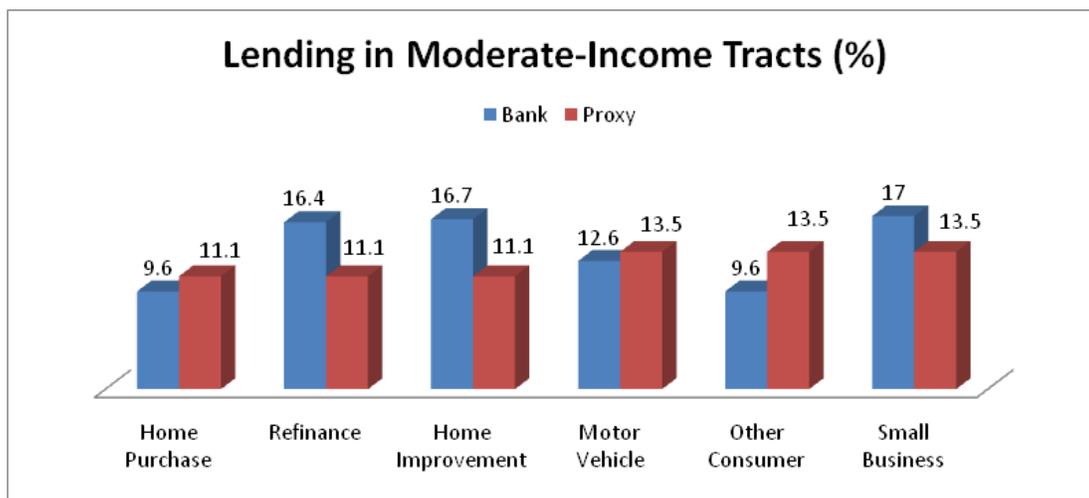
Geographic Distribution of Lending

Ohio Heritage's geographic distribution of lending reflects an adequate dispersion throughout this assessment area.

Because there are no low- and only five moderate-income census tracts in this assessment area, the bank's borrower distribution was weighted more heavily than geographic distribution. However, lending patterns in low- and moderate-income geographies are given more weight than lending in middle- and upper-income geographies.

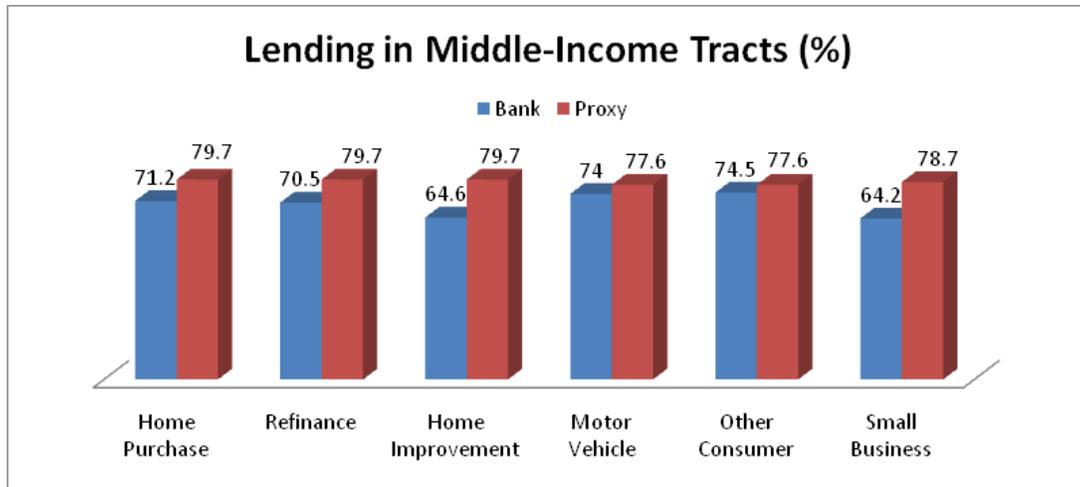
HMDA lending received the greatest weight in this analysis and is considered good. Weighted next is consumer lending, which is also considered good, followed by small business lending, which is considered excellent in this assessment area.

Of the total number of loans originated during this review period, 87.4% (689 loans) of the bank's total lending activity occurred within the nonmetropolitan area, of which 12.9% of originated loans were made in moderate-income, 72.2% in middle-income, and 14.9% in upper-income geographies. Ohio Heritage made loans in all five of its moderate-income tracts for a penetration rate of 100.0% during this review period. In addition, the bank made loans in 29 out of 31 middle-income tracts for a penetration rate of 93.5% and in all five of its upper-income tracts for a penetration rate of 100.0%. With an overall penetration rate of 92.7%, there were no unexplained gaps in the bank's lending patterns within this assessment area.



The chart above shows that in moderate-income tracts, Ohio Heritage originated a slightly lower percentage of home purchase loans compared to the percentage of owner-occupied housing units (proxy) and a substantially greater percentage for refinance and home improvement loans compared to the proxy. For consumer-type loans, Ohio Heritage originated a slightly lower percentage of motor vehicle loans compared to the percentage of households (proxy).

It also shows the bank originated a lower percentage of other consumer loans compared to the proxy. In regards to lending to small businesses, the bank originated a substantially greater number of loans than the percentage of small businesses.



The chart above shows that in middle-income tracts, Ohio Heritage originated a lower percentage for all HMDA-type loans compared to the proxy and a slightly lower number of loans for all consumer-type loans compared to its proxy. In regards to lending to small businesses, the bank originated a lower number of loans than the proxy.

The chart above shows that Ohio Heritage originated a substantially greater percentage of loans than the proxies for all loan product types in upper-income tracts.

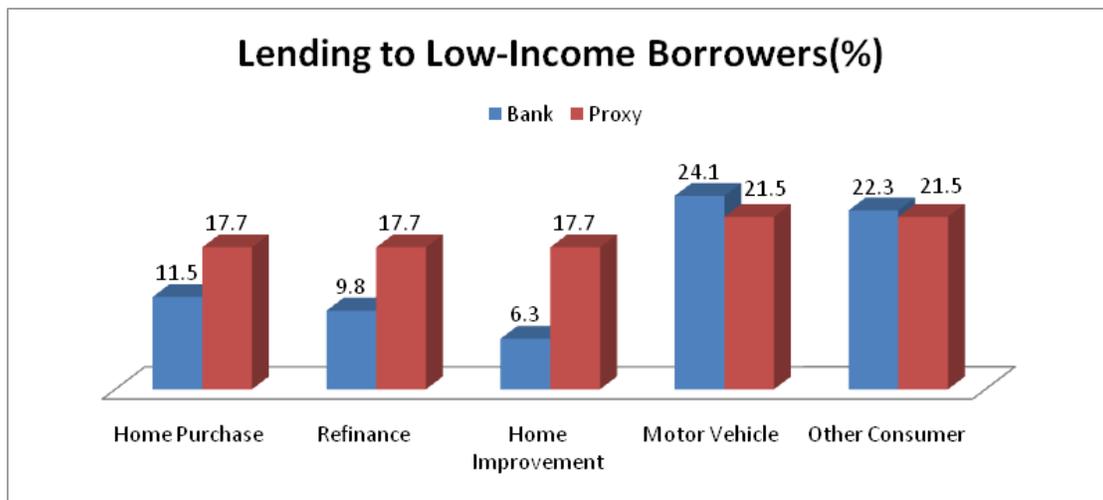
While lending is weighted more heavily in low- and moderate-income geographies than middle- and upper-income geographies, this assessment area has no low-income tracts and is comprised primarily of middle-income tracts (75.6%) and only 12.2% moderate-income tracts.

Notably, Ohio Heritage was able to originate five or more loans in each of its five moderate-income geographies during this evaluation period. Also, with only 11.1% of all housing units in moderate-income census tracts being owner-occupied dwellings, Ohio Heritage was able to extend a good level of home purchase and consumer loans and an excellent level of refinance and home improvement loans in these geographies. The bank had an excellent level of small business loans. Consequently, the bank has a good distribution of lending in moderate-income geographies within its nonmetropolitan assessment area.

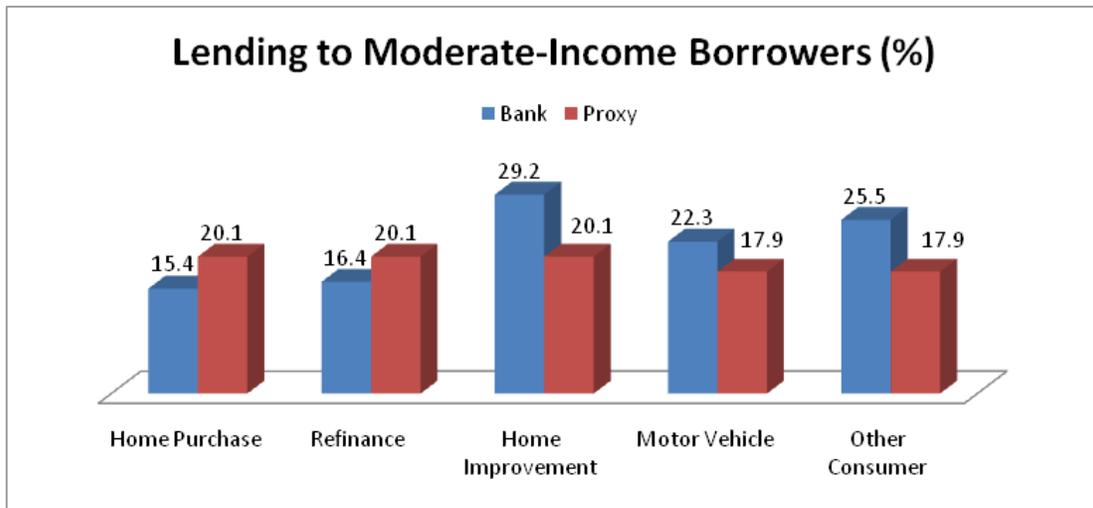
Borrower Distribution of Lending

Ohio Heritage’s lending performance reflects an adequate distribution of lending to borrowers of different income levels and an excellent level of lending to businesses of different revenue sizes (particularly to low- and moderate-income borrowers and small businesses) in this assessment area.

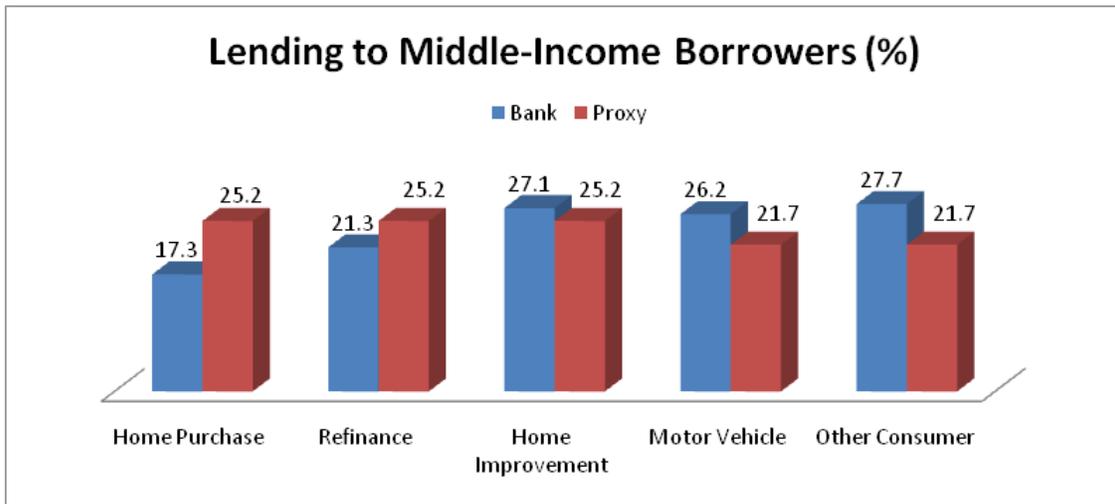
As previously discussed, the bank’s borrower distribution was weighted more heavily than geographic distribution.



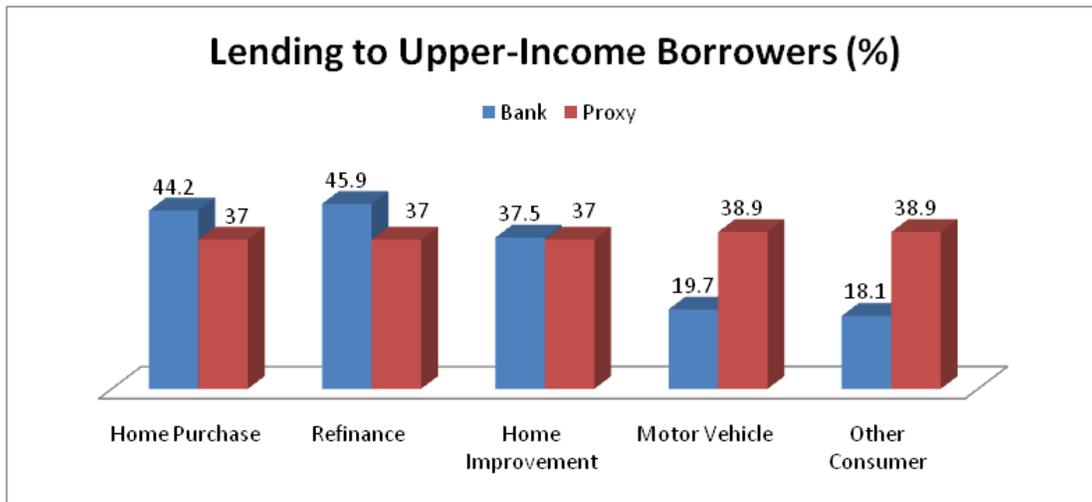
Lending to low-income borrowers in the chart above indicates that Ohio Heritage originated a lower percentage of home purchase loans compared to the percentage of families (proxy) and a substantially lower percentage for refinance and home improvement loans compared to the proxy. For consumer-type loans, Ohio Heritage originated a greater percentage for both motor vehicle and other consumer loans compared to the percentage of households (proxy).



Lending to moderate-income borrowers in the chart above indicates that Ohio Heritage originated a lower percentage of home purchase and refinance loans compared to the proxy and a substantially greater percentage for home improvement loans. For consumer-type loans, Ohio Heritage originated a greater percentage for both motor vehicle and other consumer loans compared to the proxy.



The chart above shows that in regards to lending to middle-income borrowers, Ohio Heritage originated a lower percentage of home purchase and refinance loans compared to the proxy and a greater percentage for home improvement loans compared to the proxy. For consumer-type loans, Ohio Heritage originated a substantially higher percentage for both motor vehicle and other consumer loans compared to the percentage of households.

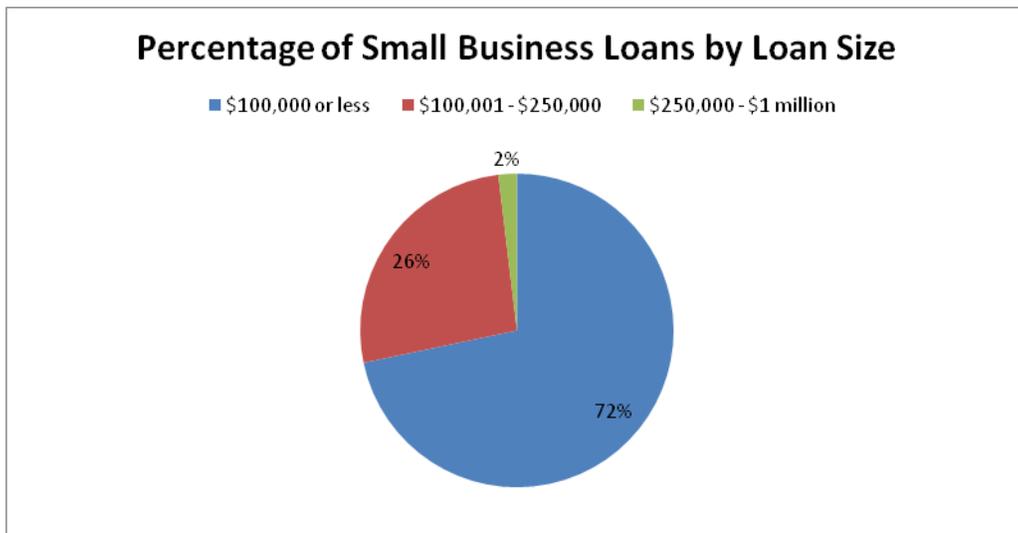


The chart above shows that in regards to lending to upper-income borrowers, Ohio Heritage exceeded the proxy for all HMDA-type loans. However, Ohio Heritage was substantially below the proxy for both motor vehicle and other consumer loans.

Considering 37.8% of the population is comprised of low- and moderate-income families and 7.2% of the families are at the poverty level and as only 35.8% of the available housing stock is affordable for low-income families and 69.3% is affordable for moderate-income families, the bank demonstrated an adequate level of home purchase and refinance lending and a good level of home improvement lending. The bank also had excellent levels of lending to low- and moderate-income borrowers for both motor vehicle and other consumer loans. As a result, lending to low- and moderate-income borrowers is considered good in the nonmetropolitan area.

According to 2010 business demographic data, the bank's assessment area has 7,950 businesses, 89.2% of which are small businesses. During this evaluation period, Ohio Heritage originated 53 small business loans, aggregating \$4.2 million.

The bank originated 88.7% of its small business loans to businesses with \$1 million or less in revenue, compared to 89.2% of these businesses within the assessment area. Therefore, the bank's lending to businesses with gross annual revenues of \$1 million or less is considered excellent in this assessment area.



Further analysis shows that 72.0% of the bank's small business loans were extended in an amount of \$100,000 or less. Since smaller-size loans are generally commensurate with the borrowing needs of smaller businesses, Ohio Heritage's lending activity demonstrates that the bank is adequately meeting the credit needs of such businesses.

METROPOLITAN ASSESSMENT AREA
(Limited-scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
COLUMBUS, OHIO MSA 18140**

The Columbus MSA 18140 is comprised of the following eight counties: Delaware, Fairfield, Franklin, Licking, Madison, Morrow, Pickaway, and Union. However, Ohio Heritage's assessment area is only comprised of entirety of Licking County. Licking County is contiguous to the bank's nonmetropolitan assessment area.

Ohio Heritage serves this assessment area through two branch offices with full-service ATMs. Both branch offices (in Newark, Ohio and Heath, Ohio) are located in middle-income census tracts.

According to the U.S. Census Bureau's annual estimates of population change for metropolitan statistical areas and rankings,¹⁸ the Columbus MSA is the third-largest metropolitan area in the state of Ohio, behind Greater Cincinnati and Greater Cleveland. The Columbus MSA is the nation's 32nd largest MSA.

According to 2010 U.S. Census data, the MSA's population totals 1.8 million residents, two-thirds of which reside in Franklin County. According to the Ohio Department of Development's Office of Policy, Research and Strategic Planning,¹⁹ Delaware County experienced the highest percentage of growth in the last ten years and replaced Licking County as the second most populous county in the MSA, with 174,214 residents. Licking County is currently ranked third in the MSA in regards to total population with 166,492 residents.

According to the FDIC Deposit Market Share Report,²⁰ as of June 30, 2010, Ohio Heritage's market share of deposits accounts for 1.4% of the market and Ohio Heritage ranks ninth (operating two offices) out of 11 institutions operating 49 offices in Licking County. The top five institutions in this market are Park National Bank, Huntington National Bank, PNC Bank NA, JPMorgan Chase Bank NA, and First Federal Savings & Loan Association with 90.84% of the market share and operating 37 (75.5%) of the total offices in the county.

One community contact was conducted in this assessment area with an economic development organization in order to provide additional information regarding the assessment area. The contact indicated that in a recently conducted economic development survey, 85.0% of small businesses in the area are doing well and 90.0% consider small business financing to be adequate. For the most part, employers in the area anticipate an increase in hiring within the next year. The contact also indicated that a majority of small businesses in the area indicated they have a good working relationship with local financial institutions.

18 www.census.gov/popest/metro/CBSA-est2009-pop-chg.html

19 www.development.ohio.gov/research/CountyTrends.htm

20 FDIC/OTS Summary of Deposits Website: www.fdic.gov

Assessment Area Demographics

Assessment Area: OH Columbus MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.2	169	0.4	63	37.3	7,698	19.1
Moderate-income	10	32.3	10,830	26.9	1,110	10.2	8,210	20.4
Middle-income	15	48.4	21,418	53.2	846	3.9	10,109	25.1
Upper-income	5	16.1	7,841	19.5	181	2.3	14,241	35.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	31	100.0	40,258	100.0	2,200	5.5	40,258	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	595	78	0.2	13.1	428	71.9	89	15.0
Moderate-income	17,431	10,067	24.3	57.8	5,989	34.4	1,375	7.9
Middle-income	30,325	22,766	55.0	75.1	6,218	20.5	1,341	4.4
Upper-income	10,409	8,486	20.5	81.5	1,577	15.2	346	3.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	58,760	41,397	100.0	70.5	14,212	24.2	3,151	5.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	375	5.6	327	5.4	26	8.7	22	7.3
Moderate-income	1,464	22.0	1,328	21.9	78	26.2	58	19.3
Middle-income	3,435	51.5	3,110	51.3	151	50.7	174	58.0
Upper-income	1,390	20.9	1,301	21.4	43	14.4	46	15.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6,664	100.0	6,066	100.0	298	100.0	300	100.0
	Percentage of Total Businesses:			91.0		4.5		4.5

Based on 2000 Census Information.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTING IN
COLUMBUS, OHIO MSA 18140**

During this evaluation period, Ohio Heritage made a total of 45 HMDA loans, 33 consumer loans, and 21 small business loans. No loans were made in the one low-income tract, 44.4% were made in moderate-income tracts, 48.9% of the loans were made in the middle-income tracts, while the remaining 6.7% were made in the upper-income tracts.

The bank made 8.9% of its HMDA loans to low-income borrowers, 13.3% to moderate-income borrowers, and 28.9% and 33.3% to middle- and upper-income borrowers, respectively. There were 15.6% of the loans that had no reported income

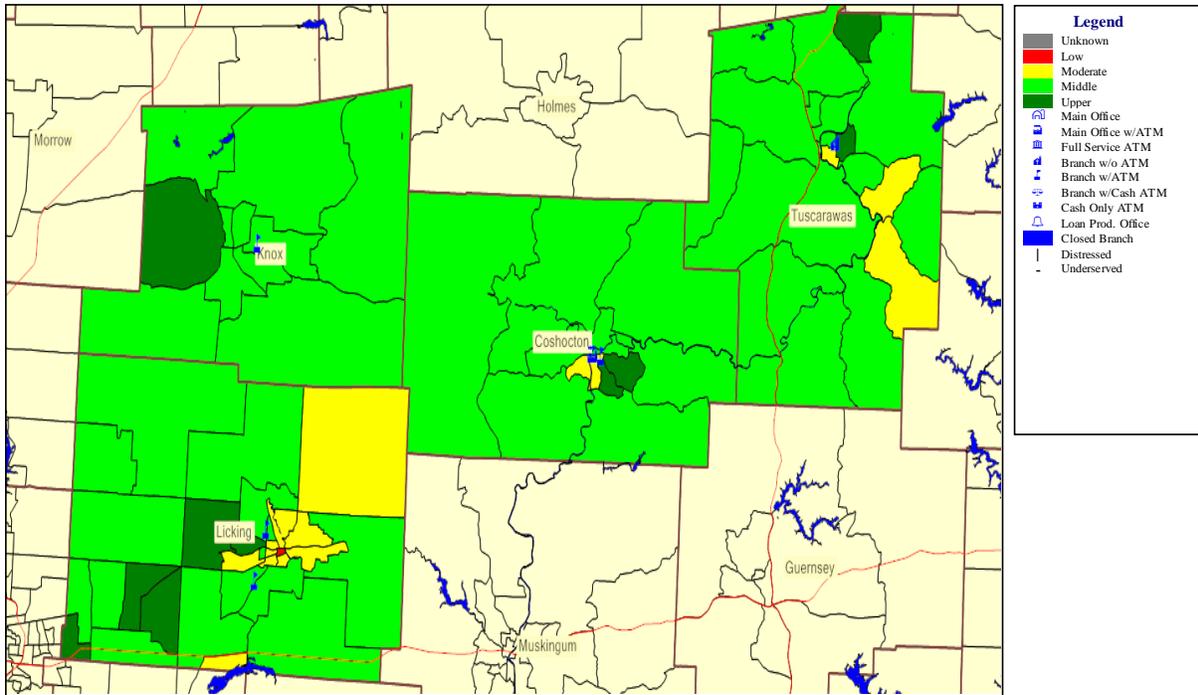
Consumer and small business lending volume was too low to evaluate.

Based on this analysis, Ohio Heritage's lending in the Columbus assessment area is consistent with the bank's overall lending within its markets.

APPENDIX A

ASSESSMENT AREA MAP

Ohio Heritage Bank
Assessment Area: Overall



APPENDIX B
CORE TABLES

Geographic Distribution of HMDA Loans

Assessment Area: OH Non MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison				
		2010				
		Bank		Demographics		Owner Occupied Units %
		Count		\$ (000s)		
#	%	\$	%			
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	23	14.3%	\$1,111	9.4%	11.1%
	Middle	111	68.9%	\$8,187	68.9%	79.7%
	Upper	27	16.8%	\$2,582	21.7%	9.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>161</i>	<i>100.0%</i>	<i>\$11,880</i>	<i>100.0%</i>	<i>100.0%</i>
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	5	9.6%	\$202	3.9%	11.1%
	Middle	37	71.2%	\$3,692	70.5%	79.7%
	Upper	10	19.2%	\$1,341	25.6%	9.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>52</i>	<i>100.0%</i>	<i>\$5,235</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	10	16.4%	\$823	14.7%	11.1%
	Middle	43	70.5%	\$3,914	69.9%	79.7%
	Upper	8	13.1%	\$861	15.4%	9.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>61</i>	<i>100.0%</i>	<i>\$5,598</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	8	16.7%	\$86	8.2%	11.1%
	Middle	31	64.6%	\$581	55.5%	79.7%
	Upper	9	18.8%	\$380	36.3%	9.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>48</i>	<i>100.0%</i>	<i>\$1,047</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of HMDA Loans

Assessment Area: OH Non MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				
		2010				
		Bank				Demographics
		Count		\$ (000s)		Families by Family Income
		#	%	\$	%	%
HMDA TOTALS	Low	15	9.3%	\$631	5.3%	17.7%
	Moderate	32	19.9%	\$1,499	12.6%	20.1%
	Middle	35	21.7%	\$2,477	20.9%	25.2%
	Upper	69	42.9%	\$6,284	52.9%	37.0%
	Unknown	10	6.2%	\$989	8.3%	0.0%
	<i>Total</i>	161	100.0%	\$11,880	100.0%	100.0%
HOME PURCHASE	Low	6	11.5%	240	4.6%	17.7%
	Moderate	8	15.4%	580	11.1%	20.1%
	Middle	9	17.3%	754	14.4%	25.2%
	Upper	23	44.2%	3,156	60.3%	37.0%
	Unknown	6	11.5%	505	9.6%	0.0%
	<i>Total</i>	52	100.0%	5,235	100.0%	100.0%
REFINANCE	Low	6	9.8%	348	6.2%	17.7%
	Moderate	10	16.4%	668	11.9%	20.1%
	Middle	13	21.3%	1,397	25.0%	25.2%
	Upper	28	45.9%	2,701	48.2%	37.0%
	Unknown	4	6.6%	484	8.6%	0.0%
	<i>Total</i>	61	100.0%	5,598	100.0%	100.0%
HOME IMPROVEMENT	Low	3	6.3%	43	4.1%	17.7%
	Moderate	14	29.2%	251	24.0%	20.1%
	Middle	13	27.1%	326	31.1%	25.2%
	Upper	18	37.5%	427	40.8%	37.0%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	48	100.0%	1,047	100.0%	100.0%

Originations & Purchases

Geographic Distribution of Consumer Loans

Assessment Area: OH Non MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010				
	Bank				Demographics
	Count		\$ (000s)		Households
	#	%	\$	%	%
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	57	12.0%	\$509	8.9%	13.5%
Middle	352	74.1%	\$4,505	78.8%	77.6%
Upper	66	13.9%	\$704	12.3%	8.9%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>475</i>	<i>100.0%</i>	<i>\$5,718</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Consumer Loans

Assessment Area: OH Non MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2010				
	Bank				Demographics
	Count		\$ (000s)		Households by Household Income
	#	%	\$	%	%
Low	113	23.8%	1,417	24.8%	21.5%
Moderate	109	22.9%	1,337	23.4%	17.9%
Middle	126	26.5%	1,514	26.5%	21.7%
Upper	92	19.4%	1,173	20.5%	38.9%
Unknown	35	7.4%	276	4.8%	N/A
<i>Total</i>	<i>475</i>	<i>100.0%</i>	<i>5,718</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Please note the data in the preceding Consumer Loan tables for the nonmetropolitan Ohio area represents all consumer lending products combined (motor vehicle and other consumer lending).

Geographic Distribution of Small Business Loans

Assessment Area: OH Non MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010				
	Bank		Demographics		Small Businesses
	Count		\$ (000s)		
#	%	\$	%	%	
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	9	17.0%	\$696	16.7%	13.5%
Middle	34	64.2%	\$2,322	55.9%	78.7%
Upper	10	18.9%	\$1,139	27.4%	7.8%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>\$4,157</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Small Business Loans by Business Revenue & Loan Size

Assessment Area: OH Non MSA

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2010				
		Bank		Total Businesses		%
		Count		\$ (000s)		
#	%	\$	%			
BUSINESS REVENUE	\$1million or Less	47	88.7%	\$3,699	89.0%	89.2%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.7%
	<i>Total where Rev is available</i>	<i>47</i>	<i>88.7%</i>	<i>\$3,699</i>	<i>89.0%</i>	<i>94.9%</i>
	Rev. Not Known	6	11.3%	\$458	11.0%	5.1%
	<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>\$4,157</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	38	71.7%	\$1,554	37.4%	
	\$100,001 - \$250,000	14	26.4%	\$2,327	56.0%	
	\$250,000 - \$1 Million	1	1.9%	\$276	6.6%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>\$4,157</i>	<i>100.0%</i>	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	34	72.3%	\$1,392	37.6%	
	\$100,001 - \$250,000	12	25.5%	\$2,031	54.9%	
	\$250,000 - \$1 Million	1	2.1%	\$276	7.5%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>47</i>	<i>100.0%</i>	<i>\$3,699</i>	<i>100.0%</i>	

Originations & Purchases

Geographic Distribution of HMDA Loans

Assessment Area: OH Columbus MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison				
		2010				
		Bank		Demographics		Owner Occupied Units %
		Count		\$ (000s)		
#	%	\$	%			
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.2%
	Moderate	20	44.4%	\$1,782	33.8%	24.3%
	Middle	22	48.9%	\$2,569	48.7%	55.0%
	Upper	3	6.7%	\$927	17.6%	20.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>45</i>	<i>100.0%</i>	<i>\$5,278</i>	<i>100.0%</i>	<i>100.0%</i>
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.2%
	Moderate	10	40.0%	\$793	25.3%	24.3%
	Middle	13	52.0%	\$1,598	50.9%	55.0%
	Upper	2	8.0%	\$747	23.8%	20.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>\$3,138</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.2%
	Moderate	7	46.7%	\$842	42.8%	24.3%
	Middle	7	46.7%	\$943	48.0%	55.0%
	Upper	1	6.7%	\$180	9.2%	20.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>\$1,965</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.2%
	Moderate	3	60.0%	\$147	84.0%	24.3%
	Middle	2	40.0%	\$28	16.0%	55.0%
	Upper	0	0.0%	\$0	0.0%	20.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$175</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of HMDA Loans

Assessment Area: OH Columbus MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				
		2010				Demographics Families by Family Income %
		Bank Count		\$ (000s)		
#	%	\$	%			
HMDA TOTALS	Low	4	8.9%	\$240	4.5%	19.1%
	Moderate	6	13.3%	\$299	5.7%	20.4%
	Middle	13	28.9%	\$1,633	30.9%	25.1%
	Upper	15	33.3%	\$2,667	50.5%	35.4%
	Unknown	7	15.6%	\$439	8.3%	0.0%
	<i>Total</i>	45	100.0%	\$5,278	100.0%	100.0%
HOME PURCHASE	Low	1	4.0%	67	2.1%	19.1%
	Moderate	3	12.0%	261	8.3%	20.4%
	Middle	4	16.0%	622	19.8%	25.1%
	Upper	10	40.0%	1,749	55.7%	35.4%
	Unknown	7	28.0%	439	14.0%	0.0%
	<i>Total</i>	25	100.0%	3,138	100.0%	100.0%
REFINANCE	Low	3	20.0%	173	8.8%	19.1%
	Moderate	0	0.0%	0	0.0%	20.4%
	Middle	7	46.7%	874	44.5%	25.1%
	Upper	5	33.3%	918	46.7%	35.4%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	15	100.0%	1,965	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	19.1%
	Moderate	3	60.0%	38	21.7%	20.4%
	Middle	2	40.0%	137	78.3%	25.1%
	Upper	0	0.0%	0	0.0%	35.4%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	5	100.0%	175	100.0%	100.0%

Originations & Purchases

Geographic Distribution of Consumer Loans

Assessment Area: OH Columbus MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010				
	Bank				Demographics
	Count		\$ (000s)		Households
	#	%	\$	%	%
Low	1	3.0%	\$6	2.3%	0.8%
Moderate	11	33.3%	\$110	40.5%	29.0%
Middle	17	51.5%	\$118	43.3%	52.1%
Upper	4	12.1%	\$38	14.0%	18.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	33	100.0%	\$272	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Consumer Loans

Assessment Area: OH Columbus MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2010				
	Bank				Demographics
	Count		\$ (000s)		Households by Household Income
	#	%	\$	%	%
Low	13	39.4%	57	20.9%	21.9%
Moderate	11	33.3%	130	47.9%	17.8%
Middle	3	9.1%	23	8.3%	20.5%
Upper	4	12.1%	26	9.5%	39.8%
Unknown	2	6.1%	36	13.4%	N/A
<i>Total</i>	33	100.0%	272	100.0%	100.0%

Originations & Purchases

Geographic Distribution of Small Business Loans

Assessment Area: OH Columbus MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010				
	Bank		Demographics		Small Businesses
	Count		\$ (000s)		
#	%	\$	%	%	
Low	0	0.0%	\$0	0.0%	5.4%
Moderate	4	19.0%	\$1,591	39.3%	21.9%
Middle	9	42.9%	\$1,951	48.2%	51.3%
Upper	8	38.1%	\$506	12.5%	21.4%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$4,049</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Small Business Loans by Business Revenue & Loan Size

Assessment Area: OH Columbus MSA

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2010				
		Bank		Total Businesses		%
		Count		\$ (000s)		
#	%	\$	%			
BUSINESS REVENUE	\$1million or Less	21	100.0%	\$4,049	100.0%	91.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	4.5%
	<i>Total where Rev is available</i>	<i>21</i>	<i>100.0%</i>	<i>\$4,049</i>	<i>100.0%</i>	<i>95.5%</i>
	Rev. Not Known	0	0.0%	\$0	0.0%	4.5%
	<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$4,049</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	15	71.4%	\$833	20.6%	
	\$100,001 - \$250,000	1	4.8%	\$163	4.0%	
	\$250,000 - \$1 Million	4	19.0%	\$1,853	45.8%	
	Over \$1 Million	1	4.8%	\$1,200	29.6%	
	<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$4,049</i>	<i>100.0%</i>	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	15	71.4%	\$833	20.6%	
	\$100,001 - \$250,000	1	4.8%	\$163	4.0%	
	\$250,000 - \$1 Million	4	19.0%	\$1,853	45.8%	
	Over \$1 Million	1	4.8%	\$1,200	29.6%	
	<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$4,049</i>	<i>100.0%</i>	

Originations & Purchases

Geographic Distribution of HMDA Loans

Assessment Area: Overall

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison				
		2010				
		Bank		Demographics		Owner Occupied Units %
		Count		\$ (000s)		
#	%	\$	%			
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.1%
	Moderate	43	20.9%	\$2,893	16.9%	16.9%
	Middle	133	64.6%	\$10,756	62.7%	68.8%
	Upper	30	14.6%	\$3,509	20.5%	14.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>206</i>	<i>100.0%</i>	<i>\$17,158</i>	<i>100.0%</i>	<i>100.0%</i>
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.1%
	Moderate	15	19.5%	\$995	11.9%	16.9%
	Middle	50	64.9%	\$5,290	63.2%	68.8%
	Upper	12	15.6%	\$2,088	24.9%	14.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>77</i>	<i>100.0%</i>	<i>\$8,373</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.1%
	Moderate	17	22.4%	\$1,665	22.0%	16.9%
	Middle	50	65.8%	\$4,857	64.2%	68.8%
	Upper	9	11.8%	\$1,041	13.8%	14.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>76</i>	<i>100.0%</i>	<i>\$7,563</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.1%
	Moderate	11	20.8%	\$233	19.1%	16.9%
	Middle	33	62.3%	\$609	49.8%	68.8%
	Upper	9	17.0%	\$380	31.1%	14.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>\$1,222</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of HMDA Loans

Assessment Area: Overall

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				
		2010				
		Bank		Demographics		Families by Family Income %
		Count	\$ (000s)			
#	%	\$	%			
HMDA TOTALS	Low	19	9.2%	\$871	5.1%	18.3%
	Moderate	38	18.4%	\$1,798	10.5%	20.2%
	Middle	48	23.3%	\$4,110	24.0%	25.2%
	Upper	84	40.8%	\$8,951	52.2%	36.3%
	Unknown	17	8.3%	\$1,428	8.3%	0.0%
	<i>Total</i>	206	100.0%	\$17,158	100.0%	100.0%
HOME PURCHASE	Low	7	9.1%	307	3.7%	18.3%
	Moderate	11	14.3%	841	10.0%	20.2%
	Middle	13	16.9%	1,376	16.4%	25.2%
	Upper	33	42.9%	4,905	58.6%	36.3%
	Unknown	13	16.9%	944	11.3%	0.0%
	<i>Total</i>	77	100.0%	8,373	100.0%	100.0%
REFINANCE	Low	9	11.8%	521	6.9%	18.3%
	Moderate	10	13.2%	668	8.8%	20.2%
	Middle	20	26.3%	2,271	30.0%	25.2%
	Upper	33	43.4%	3,619	47.9%	36.3%
	Unknown	4	5.3%	484	6.4%	0.0%
	<i>Total</i>	76	100.0%	7,563	100.0%	100.0%
HOME IMPROVEMENT	Low	3	5.7%	43	3.5%	18.3%
	Moderate	17	32.1%	289	23.6%	20.2%
	Middle	15	28.3%	463	37.9%	25.2%
	Upper	18	34.0%	427	34.9%	36.3%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	53	100.0%	1,222	100.0%	100.0%

Originations & Purchases

Geographic Distribution of Consumer Loans

Assessment Area: Overall

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010				
	Bank				Demographics
	Count		\$ (000s)		Households
	#	%	\$	%	%
Low	0	0.0%	\$0	0.0%	0.4%
Moderate	11	10.6%	\$123	6.2%	20.3%
Middle	76	73.1%	\$1,705	86.4%	66.3%
Upper	17	16.3%	\$146	7.4%	13.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>104</i>	<i>100.0%</i>	<i>\$1,973</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Consumer Loans

Assessment Area: Overall

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2010				
	Bank				Demographics
	Count		\$ (000s)		Households by Household Income
	#	%	\$	%	%
Low	25	24.0%	425	21.6%	21.7%
Moderate	27	26.0%	442	22.4%	17.8%
Middle	27	26.0%	578	29.3%	21.1%
Upper	18	17.3%	463	23.5%	39.3%
Unknown	7	6.7%	65	3.3%	N/A
<i>Total</i>	<i>104</i>	<i>100.0%</i>	<i>1,974</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Geographic Distribution of Small Business Loans

Assessment Area: Overall

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010				
	Bank		Demographics		Small Businesses
	Count		\$ (000s)		
#	%	\$	%	%	
Low	0	0.0%	\$0	0.0%	2.5%
Moderate	13	17.6%	\$2,287	27.9%	17.4%
Middle	43	58.1%	\$4,273	52.1%	66.1%
Upper	18	24.3%	\$1,645	20.0%	14.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>74</i>	<i>100.0%</i>	<i>\$8,206</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Overall

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2010				
		Bank		Total Businesses		%
		Count		\$ (000s)		
#	%	\$	%			
BUSINESS REVENUE	\$1million or Less	68	91.9%	\$7,748	94.4%	90.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.1%
	<i>Total where Rev is available</i>	<i>68</i>	<i>91.9%</i>	<i>\$7,748</i>	<i>94.4%</i>	<i>95.2%</i>
	Rev. Not Known	6	8.1%	\$458	5.6%	4.8%
	<i>Total</i>	<i>74</i>	<i>100.0%</i>	<i>\$8,206</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	53	71.6%	\$2,388	29.1%	
	\$100,001 - \$250,000	15	20.3%	\$2,489	30.3%	
	\$250,000 - \$1 Million	5	6.8%	\$2,129	25.9%	
	Over \$1 Million	1	1.4%	\$1,200	14.6%	
	<i>Total</i>	<i>74</i>	<i>100.0%</i>	<i>\$8,206</i>	<i>100.0%</i>	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	49	72.1%	\$2,225	28.7%	
	\$100,001 - \$250,000	13	19.1%	\$2,194	28.3%	
	\$250,000 - \$1 Million	5	7.4%	\$2,129	27.5%	
	Over \$1 Million	1	1.5%	\$1,200	15.5%	
	<i>Total</i>	<i>68</i>	<i>100.0%</i>	<i>\$7,748</i>	<i>100.0%</i>	

Originations & Purchases

APPENDIX C

GLOSSARY OF TERMS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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