

PUBLIC DISCLOSURE

June 6, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Croghan Colonial Bank
RSSD# 362717

323 Croghan Street
Fremont, Ohio 43420

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 safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING: This institution is rated Satisfactory.
The Lending Test is rated: Satisfactory.
The Community Development Test is rated: 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;
- A reasonable penetration of loans among individuals of different income (including low- and moderate-income individuals) levels and businesses of different sizes (including small businesses);
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation; and,
- An adequate responsiveness to the community development needs of the assessment area.

The bank was rated "Satisfactory" at the previous CRA evaluation dated May 4, 2009.

SCOPE OF EXAMINATION

Croghan Colonial Bank's ("Croghan") Community Reinvestment Act (CRA) lending performance was evaluated using loan data for the period of January 1, 2009 through December 31, 2010. The lending products reviewed for this evaluation included mortgage loans subject to the reporting requirements of the Home Mortgage Disclosure Reporting Act (HMDA), small business loans, and consumer loans.

The bank's levels of community development activities under the CRA were evaluated for the period of May 5, 2009 through June 6, 2011. In addition, full-scope reviews were conducted for both of the bank's assessment areas.

For this evaluation, HMDA loans consisted of home purchase, home refinance, home improvement, and multi-family loans. Going forward, these loans will be referred to cumulatively as HMDA loans. Consumer loans were comprised of home equity, motor vehicle, other secured, and unsecured loans. Consumer loans will be discussed individually throughout this report.

Croghan's lending activity was evaluated to determine the extent to which loans were originated inside and outside the bank's assessment area. Loans made inside the assessment area were further evaluated to determine the geographic dispersion of lending and the distribution of lending based on borrowers' incomes and businesses' gross annual revenues. For all assessment areas, Croghan's geographic dispersion of lending received less weight than the borrower distribution of lending due to the limited amount of low- and moderate-income census tracts in its assessment area.

The geographic distribution of loans was evaluated using data from the 2000 U.S. Census Bureau report. Specifically, the bank's geographic distribution of HMDA loans was assessed by comparing the percentage of loans made within the bank's census tracts to the percentage of owner-occupied housing units within the respective census tracts. The geographic distribution of small business lending was assessed by comparing the percentage of small businesses within the various-income census tracts throughout the bank's assessment area to the bank's percentage of small business loans made in those tracts. The geographic distribution of consumer lending was assessed by comparing the bank's percentage of consumer lending within the various-income census tracts to the total percentage of households by income category within the respective census tracts.

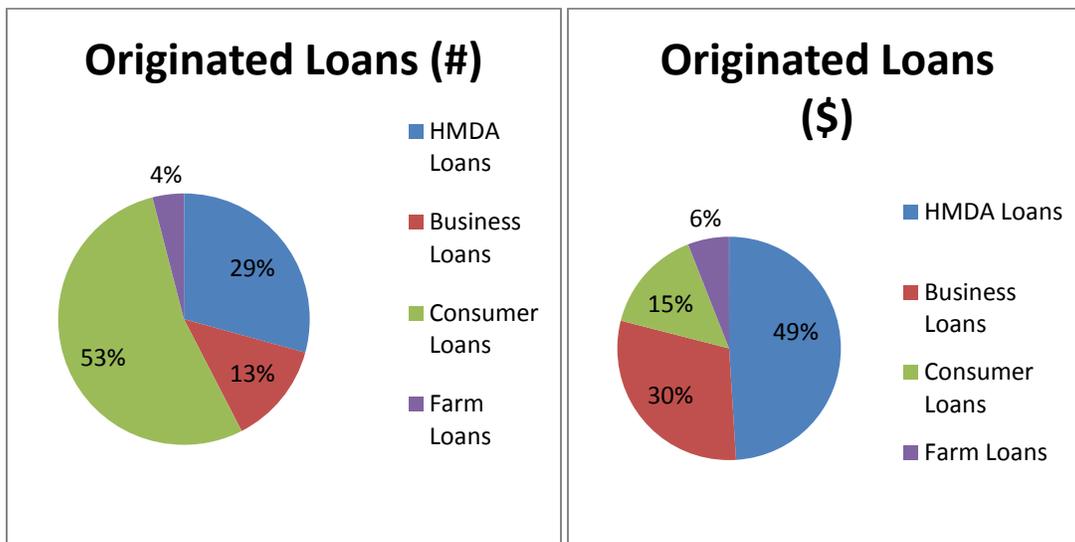
For HMDA lending, the analysis of the bank's distribution of loans to borrowers of different income categories was based on adjusted median family income statistics from the United States Department of Housing and Urban Development (HUD) for 2010. Specifically, the bank's borrower income distribution for HMDA lending was assessed by comparing the percentage of loans made to borrowers in each income category (low-, moderate-, middle-, and upper-income) to the percentage of families in each income category in the assessment area. Borrower distribution for small business lending was assessed by comparing the bank's percentage of business lending to the percentage of small businesses within the respective assessment areas.

Lastly, the borrower distribution of consumer lending was evaluated by comparing the percentage of loans made to households in each income category to the percentage of households in each income category within the respective assessment areas.

The extent of Croghan’s involvement in community development activities for the period of May 5, 2009 through June 6, 2011 was also reviewed as part of this evaluation. Specifically, community development loans and investments funded by the bank since the previous examination were reviewed for the community development test. Community development services in which the bank has been involved since the previous examination were also evaluated under the Community Development test.

The bank’s performance in nonmetropolitan Ohio received the most weight due to the concentration of branches in this area and the volume of loans originated in this area. 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)
HMDA Loans	343	\$32,666
Business Loans	160	\$19,806
Consumer Loans	634	\$9,709
Farm Loans	49	\$3,890
Total Loans	1,186	\$66,071



Given the above distributions in all assessment areas, HMDA loans received the most weight due to the high dollar amount of total loans. Business loans received the next greatest weight, based on the dollar amount. Lastly, while the bank originated more consumer loans than HMDA or business loans, these products received the least weighting, due to the lower dollar amounts of these loans. Small farm lending was not evaluated during this evaluation due to the limited loan volume.

The bank's asset size and financial condition indicate that it has the ability to continue to effectively meet the credit needs of its assessment area. There are no legal or other impediments hampering the bank's ability to meet community credit needs.

DESCRIPTION OF INSTITUTION

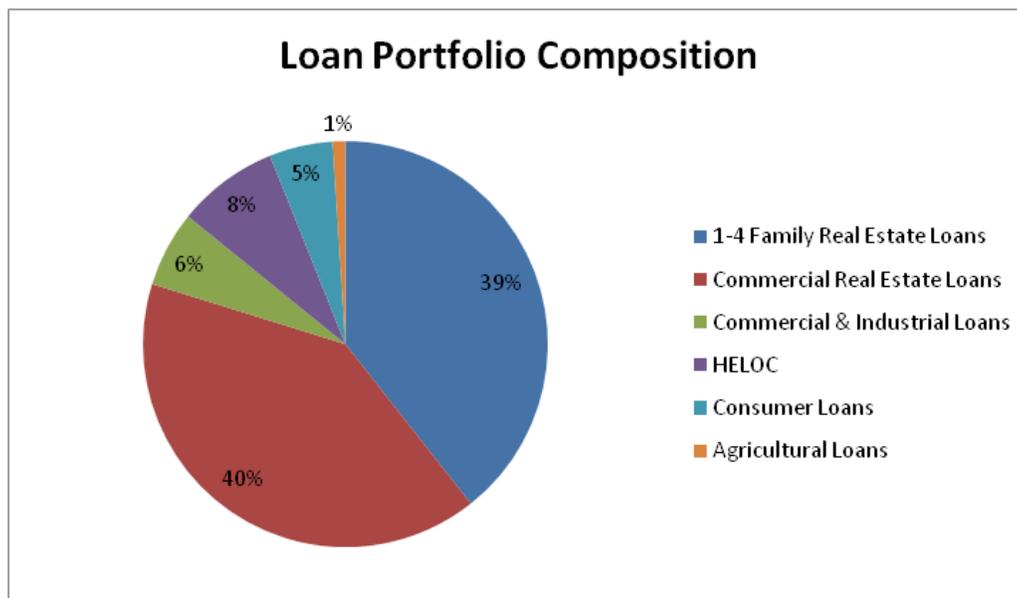
Croghan Colonial Bank is a full-service banking institution and is the sole subsidiary of Croghan Bancshares, Inc. Both are located in Fremont, Ohio in Sandusky County.

According to the March 31, 2011 Uniform Bank Performance Report (UBPR), Croghan had total assets of approximately \$494.3 million, which represents a 7.6% increase in assets since the previous evaluation in June 2009.

Croghan serves its assessment area through one main office and ten branch offices. Croghan also has a broad network of automated teller machines (ATM) throughout its assessment area. Full-service ATMs are located at all branches except the main office, East office in Fremont, Ohio, and the Port Clinton Banking Center in Port Clinton, Ohio. While there are no ATMs at the main office or East office, the Port Clinton Banking Center has a cash-dispensing ATM. Croghan also has two standalone, cash-dispensing ATMs in Put-in-Bay, Ohio and one standalone, cash-dispensing ATM in Fremont, Ohio. No branches or full service ATMs have been opened, closed, or relocated since the previous evaluation.

Croghan is primarily a retail lender, offering a variety of consumer, commercial, and agricultural deposit and credit products. Loan products include fixed- and variable-rate mortgage loans, construction loans, home equity lines of credit (HELOC), secured and unsecured consumer loans, and a variety of commercial and agricultural loan products.

As of March 31, 2011, Croghan had approximately \$286.3 million in net loans and leases. The following chart depicts the bank's loan portfolio composition as of March 31, 2011:



As of March 31, 2011, Croghan's investment portfolio totaled approximately \$160.2 million, which represents approximately 32.4% of the bank's total assets. Investments in U.S. Treasury and Agency Securities comprise approximately 59.5% of the investment portfolio and municipal investments account for 38.9% of all investments. Interest-bearing bank balances represent approximately 1.6% of all investments.

DESCRIPTION OF THE ASSESSMENT AREAS

Croghan's assessment area includes the entireties of Sandusky, Ottawa, and Wood Counties and portions of Erie, Huron, Seneca, and Henry Counties. There have been no changes to Croghan's assessment area since the previous evaluation.

For purposes of this evaluation, the six counties in which Croghan operates have been delineated into two assessment areas as follows:

- **Nonmetropolitan Ohio Area** – This area is comprised of the entirety of Sandusky County and the portions of Erie, Huron and Seneca Counties included in the bank's assessment area.
- **Toledo, Ohio Metropolitan Statistical Area (MSA) 45780** – This assessment area is comprised of the entireties of Ottawa and Wood Counties and the portions of Henry County. Henry County is not part of the Toledo, Ohio MSA; however, due to its proximity to Wood County and the fact there are no branch locations, the census tracts in Henry County were included with the Toledo, Ohio MSA for purposes of this analysis.

The total assessment area is comprised of 66 census tracts, of which one (1.5%) is designated as low-income, one (1.5%) is moderate-income, 51 (77.3%) are middle-income, and 13 (19.7%) are upper-income census tracts. In addition, six of the bank's middle-income census tracts in Huron County are designated as distressed due to high unemployment levels.

According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report,¹ dated June 30, 2010, Croghan ranked eighth out of 32 financial institutions holding 5.14% of the total market share of deposits in the assessment area. Listed below are the top five financial institutions which hold the majority of deposits in this market area:

- Huntington National Bank – 17.37%
- Fifth Third Bank – 11.34%
- KeyBank National Association – 10.08%
- Citizens Banking Company – 7.26%
- PNC Bank National Association – 6.46%

These statistics indicate that Croghan faces significant competition from larger regional and national financial institutions, throughout the assessment area.

¹ www.fdic.gov

Population Characteristics

According to the 2000 U.S. Census Bureau report, the population within Croghan’s assessment area was 286,572 people. Approximately 2.3% of the population lived in the low-income census tract and 1.8% of the population lived in the moderate-income census tract. The data further indicates that approximately 74.5% of the population lived in middle-income tracts and 21.3% lived in upper-income tracts.

The data also indicates that Wood County is the most populous of all counties in Croghan’s assessment area with a population of 121,065 people. Wood County’s population significantly exceeds that of the second most populous county (Erie County), which had a population of 79,551 in 2000. Wood County is the home of Bowling Green State University, which boasts a population of over 21,000 students² and contributes to the sizeable population difference among the counties in this assessment area. The table below depicts the projected populations throughout the counties in Croghan’s assessment area. This information was obtained from the Ohio Department of Development’s Office of Policy, Research, and Strategic Planning.³

County	Estimated Population 2010	Projected Population 2020	Projected Population 2030
Erie	77,079	82,400	83,060
Henry	28,215	29,990	30,110
Huron	59,626	63,430	64,020
Ottawa	41,428	40,270	38,520
Sandusky	60,944	57,900	56,420
Seneca	56,745	54,260	50,920
Wood	125,488	133,330	141,880

Income Characteristics

According to the 2000 U.S. Census Bureau report, there were 108,626 households in Croghan’s assessment area, of which 19,226 (17.7%) were designated as low-income, 17,247 (15.9%) were moderate-income, 21,835 (20.1%) were middle-income, and 50,318 (46.3%) were upper-income. Further, 8,890 (8.2%) of the households in the assessment area lived below the poverty level.

Of all households in Croghan’s assessment area, 75,967 are families. In 2000, the median family income in the assessment area was \$52,134, which modestly exceeded the state of Ohio’s median family income of \$50,037. Low- and moderate-income families represented approximately 13.7% and 17.2%, respectively, of all families in the assessment area. Further, 4.9% of all families in the assessment area lived below the poverty level, which was notably lower than the state of Ohio’s ratio of 7.8%.

2 www.bgsu.edu

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

For the 2010 fiscal year, the United States Department of Housing and Urban Development (HUD) estimated that the median family income for the state of Ohio increased to \$61,400.⁴ Details regarding the median family income levels and poverty rates for the respective assessment areas are discussed in the subsequent sections of this report.

Housing Characteristics

According to data from the 2000 U.S. Census Bureau report, there were 122,819 housing units in the assessment area, of which 151 (0.1%) of units were located in the low-income census tract, 2,723 (2.2%) were located in the moderate-income tract, 95,564 (77.8%) were located in middle-income tracts, and 24,381 (19.9%) were located in upper-income tracts. The data further indicates that 80,955 (65.9%) housing units were owner-occupied, 27,693 (22.6%) were rental units, and 14,171 (11.5%) were vacant units. Additionally, 98,491 (80.2%) properties were one-to-four family units, 11,711 (9.5%) were multi-family properties containing five or more units, 12,477 (10.2%) were mobile homes, and 140 (0.1%) were classified as other units.

The median age of housing stock in the assessment area was 37 years old. The following information details the median age of housing stock within the respective counties in Croghan's assessment area:

- Erie County – 39 years old
- Henry County – 42 years old
- Huron County – 40 years old
- Ottawa County – 35 years old
- Sandusky County – 46 years old
- Seneca County – 49 years old
- Wood County – 29 years old

As indicated above, the median age of housing stock throughout Croghan's assessment area is similar to that of the median age of housing stock for the state of Ohio, which is 38 years old. According to the 2000 U.S. Census Bureau report, the median housing value for this assessment area was \$100,025. Data from the Ohio Department of Development⁵ estimates that the median housing value for the counties in Croghan's assessment area increased to approximately \$126,229 since the year 2000.

The median gross rent in the assessment area was \$492, according to the 2000 U.S. Census Bureau report. The data also indicates that approximately 16.4% of rental units had monthly payments less than \$350, 40.0% of rental units had monthly payments ranging from \$350-\$499, 30.8% of rental units had monthly payments ranging from \$500-\$699, and 13.1% of rental units had monthly payments of at least \$700. Monthly rent payments were unknown for approximately 8.8% of all rental units in the area. Additionally, 30.6% of renters had rental costs exceeding 30.0% of their incomes.

4 www.huduser.org/portal/datasets/il/il10/Medians2010.pdf

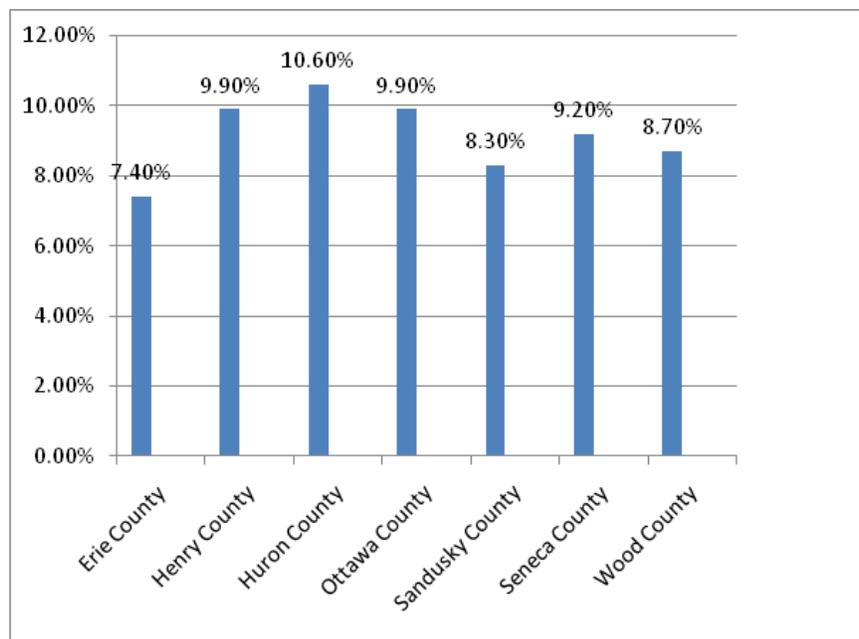
5 www.development.ohio.gov

Communities in Croghan’s assessment area have been significantly impacted by the recession of recent years and have experienced considerable job loss. These factors have contributed to high levels of foreclosure filings. These factors were taken into consideration when evaluating the bank’s lending performance. Details regarding foreclosure levels in the respective counties of Croghan’s assessment area are discussed in the subsequent sections of this report.

Labor, Employment, and Economic Characteristics

According to the Ohio Department of Job and Family Services,⁶ manufacturing, education and health services, local government, and trade are the largest employment industries in Croghan’s assessment area, based on 2008 employment statistics.

As previously discussed, this assessment area has been adversely impacted by recent national and state economic challenges, which have resulted in significant job loss. The following table depicts unemployment rates for counties in Croghan’s assessment area, as of May 2011. The data is provided by the Ohio Department of Job and Family Services.



As of May 2011, the average unemployment rate for the counties in Croghan’s assessment area was 9.1%, which exceeded the national unemployment rate of 8.7% and the state of Ohio’s unemployment rate of 8.5%. Details regarding major employers, other labor, and economic characteristics are discussed in the subsequent sections of this performance evaluation.

⁶ www.lmi.state.oh.us

Community Contacts

Community contact interviews were conducted with three organizations in the assessment area. One organization supports affordable housing, another supports community services to low-income persons, and the other supports small business development. These interviews were conducted to help ascertain the responsiveness of local financial institutions to community credit needs. Details regarding findings specific to counties in Croghan's assessment area are discussed in the subsequent sections of this report.

The following table depicts the demographics of Croghan's assessment area:

Combined Demographics Report

Croghan Colonial Bank

Assessment Group: Overall

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	1.5	7	0.0	7	100.0	10,400	13.7
Moderate-income	1	1.5	670	0.9	104	15.5	13,083	17.2
Middle-income	51	77.3	58,121	76.5	3,077	5.3	18,671	24.6
Upper-income	13	19.7	17,169	22.6	511	3.0	33,813	44.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	66	100.0	75,967	100.0	3,699	4.9	75,967	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	151	7	0.0	4.6	142	94.0	2	1.3
Moderate-income	2,723	513	0.6	18.8	2,111	77.5	99	3.6
Middle-income	95,564	62,095	76.7	65.0	20,728	21.7	12,741	13.3
Upper-income	24,381	18,340	22.7	75.2	4,712	19.3	1,329	5.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	122,819	80,955	100.0	65.9	27,693	22.5	14,171	11.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	57	0.5	43	0.4	5	0.7	9	1.2
Moderate-income	142	1.2	124	1.2	9	1.3	9	1.2
Middle-income	8,590	74.1	7,512	73.8	513	74.8	565	77.7
Upper-income	2,801	24.2	2,498	24.5	159	23.2	144	19.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	11,590	100.0	10,177	100.0	686	100.0	727	100.0
Percentage of Total Businesses:				87.8		5.9		6.3
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	1,024	80.4	1,013	80.3	8	88.9	3	100.0
Upper-income	250	19.6	249	19.7	1	11.1	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,274	100.0	1,262	100.0	9	100.0	3	100.0
Percentage of Total Farms:				99.1		0.7		0.2

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Loan-to-Deposit Ratio

A financial institution’s loan-to-deposit (LTD) ratio compares the institution’s aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution’s lending volume relative to its capacity to lend. The average LTD ratio is derived by adding the quarterly LTD ratios and dividing by the total number of quarters. Below, Croghan’s LTD ratio is compared to the bank’s aggregate peer group. The aggregate peer group is comprised of all insured commercial banks having assets between \$300 million and \$1 billion.

The following table illustrates Croghan’s quarterly LTD ratios for the eight quarters since the previous evaluation and the LTD ratios for its peer banks during that period.

Loan-to-Deposit Ratios				
As of Date	Net Loans (000s)	Total Deposits (000s)	Bank Ratio	Peer Ratio
March 31, 2011	\$286,351	\$390,181	73.39%	76.52%
December 31, 2010	\$288,350	\$384,161	75.06%	78.87%
September 30, 2010	\$297,822	\$379,759	78.42%	79.69%
June 30, 2010	\$301,305	\$361,839	83.27%	80.44%
March 31, 2010	\$309,243	\$367,833	84.07%	80.87%
December 31, 2009	\$320,051	\$370,737	86.33%	82.64%
September 30, 2009	\$325,425	\$353,841	91.97%	84.75%
June 30, 2009	\$330,607	\$359,749	91.90%	85.98%
Quarterly Loan-to-Deposit Ratio Average Since Previous Evaluation			83.05%	81.22%

The previous table indicates that until the third quarter of 2010, Croghan’s LTD ratios modestly exceeded those of its peers. While Croghan’s LTD ratio has slightly decreased in recent months, the ratio is still proportionate to its capacity to lend.

Next, Croghan’s LTD ratio was compared to those of two local peer banks to further analyze the appropriateness of Croghan’s lending volume in relation to its intake of deposits. The local peer banks were selected from the Deposit Market Share Report issued by the FDIC.⁷ The following tables depict Croghan’s LTD ratios against those of The Old Fort Banking Company and Genoa Savings Bank, both of which hold sizeable shares of deposits in the market area.

⁷ www.fdic.gov

Institution Name	# of Branches	Financial Information As of March 31, 2011		
		Total Assets (\$000)	Net Loans and Leases (\$000)	Total Deposits (\$000)
Croghan	11	\$494,303	\$286,351	\$390,181
The Old Fort Banking Company	5	\$377,181	\$236,689	\$320,063
Genoa Savings Bank	2	\$253,892	\$169,686	\$213,879

As of Date	Croghan's Average LTD Ratio	The Old Fort Banking Company's Average LTD Ratio	Genoa Savings Bank's LTD Ratio
March 31, 2011	73.39%	73.95%	79.34%
December 31, 2010	75.06%	78.52%	85.87%
September 30, 2010	78.42%	80.49%	82.25%
June 30, 2010	83.27%	82.94%	84.20%
March 31, 2010	84.07%	84.98%	86.28%
December 31, 2009	86.33%	86.73%	87.32%
September 30, 2009	91.97%	90.24%	89.61%
June 30, 2009	91.90%	92.36%	87.33%
Quarterly LTD Average Ratio	83.05%	83.78%	85.28%

The tables above indicate that Croghan's LTD ratios generally aligned with modest fluctuations above and below those of The Old Fort Banking Company and Genoa Savings Bank. Similar to previous comments, Croghan's LTD ratio has been slightly below those of its peers since the third quarter of 2010. However, the bank's levels of lending in comparison to its intake of deposits remain commensurate with its resources and capacity to lend, particularly in light of economic challenges and banks' tightened credit standards in recent years. Therefore, Croghan's LTD ratio is considered reasonable.

Lending in the Assessment Area

Croghan's HMDA, small business, and consumer loans were analyzed to determine the level of lending made inside its assessment area. As illustrated in the following table, a majority of Croghan's loans (approximately 89.0% by volume and 86.1% by dollar amount) were made within its assessment area.

Lending Inside and Outside the Assessment Area									
Loan Type	Inside the Assessment Area				Outside the Assessment Area				
	# of Loans	%	\$ (000s)	%	# of Loans	%	\$ (000s)	%	
<i>HMDA Loans</i>	343	96.1%	\$32,666	96.5%	14	3.9%	\$1,198	3.5%	
<i>Small Business Loans</i>	160	87.9%	\$19,806	74.6%	22	12.1%	\$6,747	25.4%	
<i>Consumer Loans</i>									
HELOC	148	96.1%	\$5,239	92.3%	6	3.9%	\$438	7.7%	
Motor Vehicle	151	96.2%	\$1,610	96.0%	6	3.8%	\$67	4.0%	
Other Secured	125	61.3%	\$2,261	60.6%	79	38.7%	\$1,473	39.4%	
Unsecured	210	96.3%	\$599	96.3%	8	3.7%	\$23	3.7%	
TOTAL LOANS	1137	89.0%	\$62,181	86.1%	135	11.0%	\$9,946	14.0%	

Geographic Distribution of Lending

As previously discussed, due to the limited number of low- and moderate-income census tracts in the assessment area, Croghan’s geographic distribution of lending received less weighting than its distribution of lending to borrowers of different income levels and businesses of different revenue sizes.

Croghan’s distribution of loans reflects a reasonable dispersion of lending throughout the assessment area. This rating was determined by reviewing the bank’s lending data for HMDA, small business, and consumer loans in conjunction with demographical data. Details regarding the bank’s performance within specific product categories and assessment areas are discussed later in this evaluation.

Borrower Distribution of Lending

Croghan’s levels of lending to borrowers of different income levels (especially to low- and moderate-income borrowers) and to businesses of different revenue sizes (particularly to businesses with gross annual revenues less than \$1 million) is reasonable. This rating is based on the bank’s performance throughout the entire assessment area. This rating was determined by reviewing Croghan’s lending data for HMDA, small business, and consumer loans in conjunction with demographical data. Details regarding the bank’s performance within specific product categories and assessment areas are discussed later in this report.

Community Development

A review of Croghan’s community development activities for this evaluation period revealed that the bank has demonstrated an adequate responsiveness to the community development needs of the assessment area.

Community Development Loans

Croghan originated no community development loans during this evaluation period.

Community Development Investments

Croghan made approximately \$1.7 million in qualified community development investments during this review period. The investments supported services to low- and moderate-income individuals and economic development.

Community Development Services

Croghan provided qualified community development services to a variety of organizations throughout its assessment area during this evaluation period. These services were primarily in the form of employees providing financial expertise to a variety of local organizations, including economic development and community services to low- and moderate-income persons. Examples of some activities in which bank employees participated include Habitat for Humanity, the Sandusky County Economic Development Corporation, and the Salvation Army of Port Clinton. The bank also co-sponsored several small business development seminars throughout the assessment area during this evaluation period.

Details of the bank's community development performance within each assessment area are discussed later in this report.

Response to Consumer Complaints

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

Fair Lending or Other Illegal Credit Practices Review

A fair lending review was completed in conjunction with the compliance and CRA examinations. No evidence of discrimination or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**DESCRIPTION OF THE INSITUATION’S OPERATIONS IN
NONMETROPOLITAN OHIO AREA**
(Full-scope Review)

The Nonmetropolitan Area Ohio assessment area is comprised of the entirety of Sandusky County, portions of southwest Erie County, northwest Huron County, and northern Seneca County. In total, there are 26 census tracts in this assessment area, of which none are low- or moderate-income, 21 (80.8%) are middle-income and five (19.2%) are upper-income tracts. Further, six of the middle-income census tracts in Huron County are classified as distressed due to high unemployment.

Croghan’s main office and eight of its branches (81.8%) are located in this assessment area. Additionally, the majority (85.2% by volume and 70.8% by dollar amount) of Croghan’s loans were originated in this assessment area during this evaluation period. For these reasons, Croghan’s lending performance in this assessment area received the most weight for this evaluation.

Population Characteristics

Data from the 2000 United States Census Bureau report indicates that the total population of this assessment area was 112,600. Data also indicates that 26.9% of the population were age 17 years and younger, 8.1% were 18 to 24, 51.3% were 25 to 64, and 13.6% were 65 and older.

The most populous county in this assessment area is Erie County, which had a population of 79,551 in 2000. As previously discussed, the Ohio Department of Development estimates that Erie County’s population decreased to 77,079 (3.1%) in 2010. The data also projects that the other counties in this assessment area to have experienced modest population changes. The table below depicts the estimated population changes for the remaining counties in this assessment area:

County	2000 Population	Estimated 2010 Population	Net Change
Huron County	59,487	59,626	+ 0.2%
Sandusky County	61,792	60,944	-1.4%
Seneca County	58,683	56,745	-3.4%

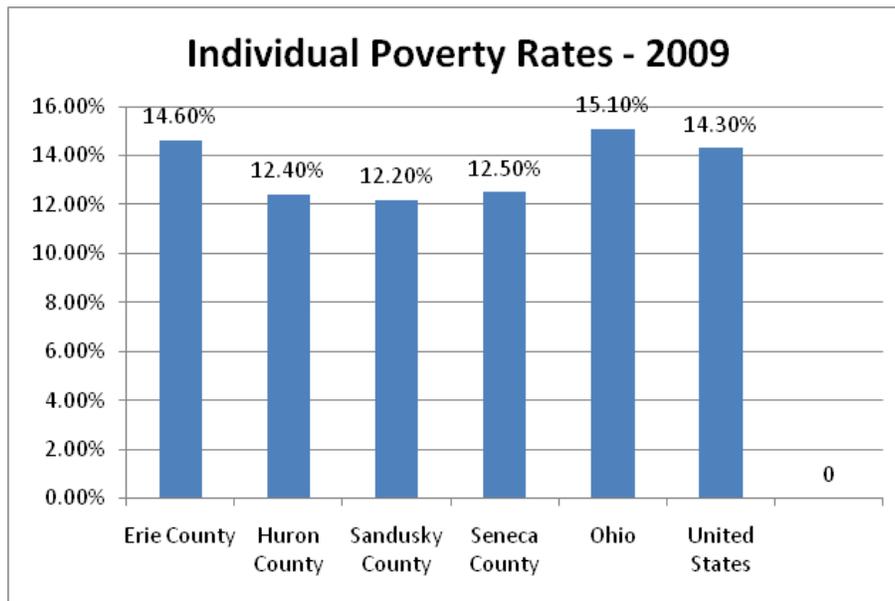
Income Characteristics

As of 2000, there were 42,636 households in this assessment area, of which approximately 16.5% were low-income, 15.6% were moderate-income, 21.5% were middle-income, and 46.5% were upper-income households. Approximately 7.1% of all households in this area lived below the poverty level.

Of the 42,636 households in this area, 30,971 were (72.6%) were designated as families. The median family income for this assessment was \$48,900, which was below the state of Ohio’s

median family income of \$50,037. Low- and moderate-income families represented approximately 13.4% and 17.8% of all families in the assessment area, respectively. Middle-income families comprised 24.1% of the population and upper-income families represented 44.7% of the population. Approximately 5.4% of families in this assessment area lived below the poverty level. This figure was below the 7.8% of families in the state of Ohio living below the poverty level. Data from HUD indicates that the median family income for nonmetropolitan Ohio increased to \$53,700 for the 2010 fiscal year.

Data released by the Economic Research Service of the United States Department of Agriculture (USDA)⁸ in 2009 revealed the following characteristics regarding persons living in poverty in this assessment area:



Housing Characteristics

According to data from the 2000 U.S. Census Bureau report, there were 45,240 housing units in this assessment area, of which 37,547 (83.0%) were located in middle-income tracts and 7,693 (17.0%) were located in upper-income tracts. The data further indicates that 32,070 (70.9%) were owner-occupied units, 10,632 (23.5%) were rental units, and 2,538 (5.6%) were vacant units. Additionally, 39,545 (87.4%) were one-to-four family units, 2,606 (5.8%) were multi-family properties containing five or more units, 3,028 (6.7%) were mobile homes, and 61 (0.1%) were classified as other units.

⁸ www.ers.usda.gov/Data/PovertyRates

As of 2000, the median age of housing stock in this assessment area was 45 years old. The following information details the median age of housing stock within the respective counties of this assessment area:

- Erie County – 39 years old
- Huron County – 40 years old
- Sandusky County – 46 years old
- Seneca County – 49 years old

The median age of housing stock in this assessment area is older than the median age of housing stock for the state of Ohio, which is 38 years old. According to the 2000 U.S. Census Bureau report, the median housing value for this assessment area was \$92,377. Data from the Ohio Department of Development estimates that the median housing value for the counties in this area increased to approximately \$118,675 since 2000.

The median gross rent in this assessment area was \$472, according to the 2000 U.S. Census Bureau report. Approximately 19.2% of rental units had monthly payments less than \$350, 31.8% of rental units had monthly payments ranging from \$350-\$499, 29.4% of rental units had payments ranging from \$500-\$699, and 9.3% of rental units had monthly payments of at least \$700. Additionally, 24.5% of renters had rental costs exceeding 30.0% of their incomes. Monthly rental payments were unknown for 10.4% of rental units in this area.

As previously discussed, Croghan's assessment area has been considerably impacted by the recent recession and has experienced notable job loss, which has contributed to high levels of foreclosure filings in this assessment area. Data provided by realtytrac.com⁹ indicate that as of May 2011, there were 73,046 homes in foreclosure in the state of Ohio.

Listed below are the foreclosure statistics for the counties within this assessment area as of May 2011:

- **Erie County** – One in every 871 housing units received foreclosure filings in May 2011.
- **Huron County** - one in every 592 housing units received foreclosure filings in May 2011.
- **Sandusky County** –One in every 470 housing units received foreclosure filings in May 2011.
- **Seneca County** – One in every 564 housing units received foreclosure filings in May 2011.

This information was taken into consideration when evaluating the bank's lending performance.

⁹ www.realtytrac.com

Labor, Employment, and Economic Characteristics

The following table illustrates land use in each county in the assessment area¹⁰:

	Urban	Cropland	Pasture	Forest	Open Water	Wetlands	Bare/Mines
Erie County	12.7%	53.4%	10.2%	16.2%	2.2%	4.8%	0.7%
Huron County	3.9%	70.8%	8.1%	16.3%	0.8%	0.1%	0.0%
Sandusky County	5.7%	71.6%	10.5%	6.6%	1.5%	3.8%	0.4%
Seneca County	5.0%	79.4%	4.3%	10.2%	0.4%	0.4%	0.3%

The data indicates that the availability of urban and crop land is somewhat limited and could impact Croghan’s ability to make business- and residential-type (particularly development) loans in this assessment area.

Major employers in this assessment area include:

Erie County	Cedar Point; Kalahari Resorts; Kyklos Bearing, Incorporated; Ford Motor Company, Firelands Regional Medical Center
Huron County	Berry Plastics/Venture Packaging; Campbell Soup/Pepperidge Farm; Fisher-Titus Medical Center; Norwalk City Schools
Sandusky County	Whirlpool Corporation; Bellevue Hospital; HJ Heinz Company; Eaton IONAC, Fremont City Schools; Atlas Industries
Seneca County	State of Ohio; Tiffin University; Dorel Industries/Ameriwood Industries; Heidelberg College; Mercy Hospital of Tiffin

The primary sectors for employment in this area are manufacturing, service (recreation), and educational and health services.

Interviews with community contacts revealed (and unemployment rates support) that some parts of this assessment area have been more profoundly impacted by the challenging economic climate of recent years than others. For instance, Huron County has the highest unemployment rate of all counties in this assessment area, which is largely the result of the closure of the Norwalk Furniture plant. Discussions with community contacts revealed that while the area still maintains an active manufacturing industrial base, many of the jobs pay lower wages, resulting in continued financial challenges for many residents. This assessment area was also closely connected to the Detroit, Michigan automobile industry primarily through supplier networks. When the American automobile industry declined, many of those jobs were lost. Although the automobile industry is strengthening, many of those related jobs lost have not returned. This continually impacts the local economies of this assessment area.

¹⁰ www.development.ohio.gov/research

Community Contacts

Community contact interviews were conducted with two local organizations whose service footprints extend throughout this assessment area. One organization provides various community services to low-income persons and the other focuses on affordable housing. Overall, the contacts stated that local banks are generally responsive to community credit needs. However, there is a need for financial literacy training – particularly to the area’s under-banked residents.

The following depicts the demographic characteristics of this assessment area:

Combined Demographics Report

Croghan Colonial Bank

Assessment Area: Ohio 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	4,161	13.4
Moderate-income	0	0.0	0	0.0	0	0.0	5,500	17.8
Middle-income	21	80.8	25,272	81.6	1,492	5.9	7,455	24.1
Upper-income	5	19.2	5,699	18.4	184	3.2	13,855	44.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	26	100.0	30,971	100.0	1,676	5.4	30,971	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	37,547	25,834	80.6	68.8	9,674	25.8	2,039	5.4
Upper-income	7,693	6,236	19.4	81.1	958	12.5	499	6.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	45,240	32,070	100.0	70.9	10,632	23.5	2,538	5.6
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	3,707	82.6	3,273	82.3	221	84.0	213	85.2
Upper-income	781	17.4	702	17.7	42	16.0	37	14.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,488	100.0	3,975	100.0	263	100.0	250	100.0
Percentage of Total Businesses:			88.6		5.9		5.6	
	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	388	66.9	383	66.7	4	100.0	1	50.0
Upper-income	192	33.1	191	33.3	0	0.0	1	50.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	580	100.0	574	100.0	4	100.0	2	100.0
Percentage of Total Farms:			99.0		0.7		0.3	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TEST IN NONMETROPOLITAN OHIO AREA

Geographic Distribution of Lending

There are no low- or moderate-income census tracts in this assessment area. Therefore, the bank's lending performance in those areas will not be discussed.

This evaluation revealed no significant lending gaps in this assessment area. During this evaluation period, Croghan made HMDA loans in 24 (92.3%) of this area's 26 census tracts. Additionally, the bank made small business and consumer loans in 21 (80.8%) of the 26 census tracts in this area. As previously discussed, all six of the bank's middle-income census tracts in Huron County are designated as distressed due to unemployment. Croghan originated 124 loans in those tracts during this review period. This level of lending in distressed middle-income tracts indicates the institution's efforts to accommodate the diverse credit needs of the community.

HMDA Lending

Croghan originated 222 (75.3%) HMDA loans in middle-income tracts. This was below the percentage (80.6%) of owner-occupied units in these tracts. Further, the bank originated 73 (24.7%) of its HMDA loans in upper-income tracts, which exceeded the percentage (19.4%) of owner-occupied units in these tracts.

Business Lending

Croghan originated 113 (86.3%) business loans in middle-income tracts, which exceeded the percentage (82.6%) of businesses located in middle-income tracts. Further, the bank made 18 (13.7%) of its business loans in upper-income tracts. This level of lending was below the percentage (17.4%) of businesses located in these tracts.

Consumer Lending

HELOC

Croghan originated 101 (80.2%) of its HELOC loans in middle-income tracts, which was slightly below the percentage (83.2%) of middle-income households in this area. The bank made 25 (19.8%) HELOC loans in upper-income tracts, which exceeded the percentage (16.8%) of upper-income households in the assessment area.

Motor Vehicle

Croghan originated 121 (85.2%) motor vehicle loans in middle-income tracts, which exceeded the percentage (83.2%) of middle-income households in the area. The bank made 21 (14.8%) of its motor vehicle loans in upper-income tracts. This level of lending was below the percentage (16.8%) of upper-income households in this area.

Other Secured

Croghan originated 66 (74.2%) other secured loans in middle-income census tracts, which was below the percentage (83.2%) of middle-income households in the area. The bank made 23 (25.8%) of its other secured loans in upper-income tracts. This level of lending exceeded the percentage (16.8%) of upper-income households in this area.

Unsecured

Croghan originated 163 (84.5%) unsecured loans in middle-income census tracts, which exceeded the percentage (83.2%) of middle-income households in the area. The bank made 30 (15.5%) of its unsecured loans in upper-income tracts. This level of lending was below the percentage (16.8%) of upper-income households in this area.

Borrower Distribution of Lending

Croghan's lending performance reflects a reasonable distribution of lending to borrowers of different income levels and businesses of different revenue sizes (particularly to low- and moderate-income borrowers and small businesses).

HMDA Lending

Croghan originated 13 (4.4%) of its HMDA loans to low-income borrowers. This was significantly below the percentage (13.4%) of low-income families in this assessment area. The bank made 53 (18.0%) HMDA loans to moderate-income borrowers. This exceeded the percentage (17.8%) of moderate-income families in the assessment area.

The bank made 72 (24.4%) HMDA loans to middle-income borrowers, which aligned with the percentage (24.1%) of middle-income families in the assessment area. Croghan originated 134 (45.4%) HMDA loans to upper-income borrowers. This level of lending slightly exceeded the percentage (44.7%) of upper-income families in the assessment area. Further, 23 (7.8%) of the bank's HMDA loans were made to borrowers where the income levels were unknown.

Based on this analysis, Croghan's level of HMDA lending to borrowers of different income levels is considered good.

Business Lending

Croghan originated 79 (60.3%) of its business loans to entities with gross annual revenues of \$1 million or less. This was below the percentage (88.6%) of small businesses in the assessment area.

The bank originated 106 (80.9%) of its business loans for amounts less than or equal to \$100,000. Further, 17 (13.0%) of its business loans were for amounts greater than \$100,000, but less than or equal to \$250,000. Lastly, Croghan made eight (6.1%) business loans for amounts greater than \$250,000, but less than or equal to \$1 million. Business loans for amounts less than or equal to \$100,000 are often indicative of small business credit needs. This information indicates that Croghan is adequately meeting the needs of small businesses in this area.

Consumer Lending

HELOC

Croghan originated seven (5.6%) HELOC loans to low-income borrowers, which was significantly below the percentage (16.5%) of low-income households in the assessment area. The bank made 20 (15.9%) of its HELOC loans to moderate-income borrowers, which is comparable to the percentage (15.6%) of moderate-income households in the area.

The bank made 30 (23.8%) HELOC loans to middle-income borrowers. This slightly exceeded the percentage (21.5%) of middle-income households in the assessment area. Croghan originated 55 (43.7%) HELOC loans to upper-income borrowers, which was slightly below the percentage (46.5%) of upper-income households in the assessment area. Lastly, the bank made 14 (11.1%) of its HELOC loans to borrowers where the income levels were unknown.

Based on this information, Croghan's level of HELOC lending to borrowers of different income categories is considered adequate.

Motor Vehicle

Croghan originated 27 (19.0%) motor vehicle loans to low-income borrowers. This exceeded the percentage (16.5%) of low-income households in the assessment area. The bank made 39 (27.5%) of its motor vehicle loans to moderate-income borrowers, which significantly exceeded the percentage (15.6%) of moderate-income households in this area.

The bank made 32 (22.5%) motor vehicle loans to middle-income borrowers, which slightly exceeded the percentage (21.5%) of middle-income households in the area. Croghan originated 34 (23.9%) motor vehicle loans to upper-income households. This was significantly below the percentage (46.5%) of upper-income households in the area. Lastly, the bank made ten (7.0%) of its motor vehicle loans to borrowers where the income levels were unknown.

Based on this information, Croghan's levels of motor vehicle lending to borrowers of different income categories is considered excellent.

Other Secured

Croghan originated 13 (14.6%) other secured loans to low-income borrowers, which was slightly below the percentage (16.5%) of low-income households in the area. The bank originated 24 (27.0%) other secured loans to moderate-income borrowers, which significantly exceeded the percentage (15.6%) of moderate-income households in the assessment area.

Croghan originated 24 (27.0%) other secured loans to middle-income borrowers, which significantly exceeded the percentage (21.5%) of middle-income households in the area. The bank originated 26 (29.2%) of its other secured loans to upper-income borrowers. This level of lending was significantly below the percentage (46.5%) of upper-income households in the assessment area. Lastly, the bank made two (2.2%) other secured loans to borrowers where the income levels were unknown.

Based on this information, Croghan's levels of other secured lending to borrowers of different income categories is considered good.

Unsecured

Croghan originated 30 (15.5%) of its unsecured loans to low-income borrowers, which was slightly below the percentage (16.5%) of low-income households in the assessment area. The bank originated 25 (13.0%) unsecured loans to moderate-income borrowers. This was slightly below the percentage (15.6%) of moderate-income households in the assessment area.

Croghan originated 16 (8.3%) unsecured loans to middle-income borrowers, which was significantly below the percentage (21.5%) of middle-income households in the assessment area. The bank originated nine (4.7%) unsecured loans to upper-income borrowers. This was substantially below the percentage (46.5%) of upper-income households in the area. Lastly, the bank originated 113 (58.5%) of its unsecured loans to borrowers where the income levels were unknown. This was a limitation in this analysis.

Based on this information, Croghan's level of unsecured lending to borrowers of different income categories is considered adequate.

Community Development

Community Development Loans

Croghan made no qualified community development loans during this evaluation period.

Community Development Investments

Croghan made approximately \$1.7 million in qualified investments in this assessment area during this evaluation period. The majority of these investments (approximately \$1.67 million) supported local schools where the majority of students are from low- and moderate-income households. The remaining donations made supported economic development.

Community Development Services

Croghan provided qualified community development services to seven local organizations in this assessment area during this evaluation period. The services primarily involved bank employees' provisions of financial expertise through leadership and general membership to these organizations. Listed below is a sample of the organizations in which Croghan employees participated, during this review period:

- Chamber of Commerce (Bellevue, Ohio)
- Habitat for Humanity (Huron County)
- Sandusky County Economic Development Corporation
- WSOS Community Action Commission

Croghan also co-sponsored four small business development seminars in conjunction with the State of Ohio and other local financial institutions.

Based on this analysis, Croghan is adequately supporting the community development needs of this assessment area.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
TOLEDO, OHIO MSA 45780**
(Full-scope Review)

The Toledo, Ohio MSA 45780 is comprised of Fulton, Lucas, Ottawa and Wood Counties; however, the bank's assessment area only includes Ottawa and Wood Counties. In addition, due to the proximity to Wood County, portions of eastern Henry County are included within this assessment area. The bank has no branch locations in Henry County. In total, there are 40 census tracts in this assessment area, of which one (2.5%) is low-income, one (2.5%) is moderate-income, 30 (75.0%) are middle-income, and eight (20.0%) are upper-income tracts.

Croghan operates two (18.2%) of its 11 branches in this assessment area. Additionally, 175 (14.8% by volume and 29.2% by dollar amount) of Croghan's loans were originated in this assessment area during this evaluation period. Given the limited presence of banking offices and loan volume, Croghan's loan performance in this assessment area received less weight for this evaluation.

Population Characteristics

According to the 2000 U.S. Census Bureau report, the population of this assessment area was 173,972. The data also indicates that 23.9% of the population were age 17 years and younger, 14.1% were 18 to 24, 50.0% were 25 to 64, and 12.4% were age 65 and older.

The most populous county in this assessment area is Wood County, which had a population of 121,065 in 2000. The Ohio Department of Development estimates that the population in Wood County increased by 3.5% to 125,488 in 2010. The data also projects the other counties in this assessment area to have modest population changes. The table below depicts the estimated population changes for the remaining counties in this assessment area:

County	2000 Population	Estimated 2010 Population	Net Change
Henry County	29,210	28,215	-3.4%
Ottawa County	40,985	41,428	1.1%

Income Characteristics

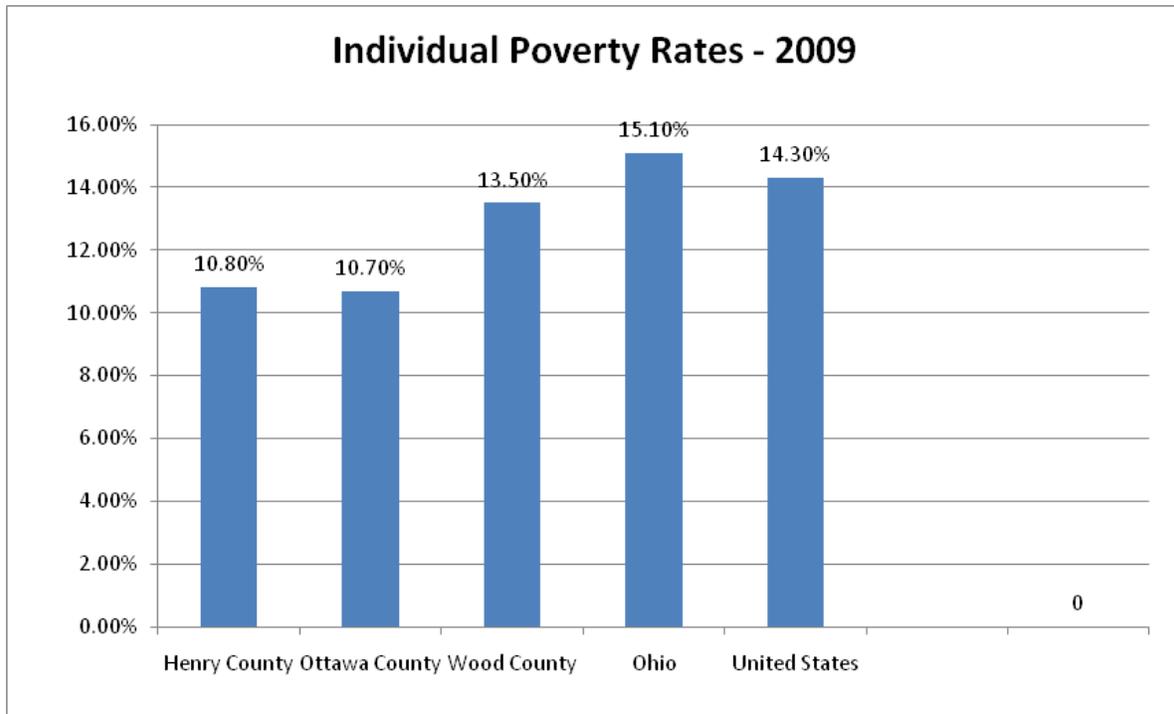
As of 2000, there were 65,990 households in this assessment area, of which approximately 18.5% were low-income, 16.1% were moderate-income, 19.2% were middle-income, and 46.2% were upper-income. Approximately 8.9% of all households in this area lived below the poverty level.

Of the 65,990 households in this area, 44,996 (68.2%) were designated as families. The median family income for this assessment area was \$54,558, which exceeded the state of Ohio's median family income of \$50,037. Low- and moderate-income families represented approximately 13.9% and 16.9% of all families in the assessment area, respectively. Middle-income families comprised 24.9% of the population and upper-income families represented 44.4% of the

population.

Approximately 4.5% of families in this assessment area lived below the poverty level. This figure was below the 7.8% of families in the state of Ohio living below the poverty level. Data from HUD indicate that for the 2010 fiscal year, the median family income for metropolitan Ohio areas increased to \$63,400.

Data released by the Economic Research Service of the USDA in 2009, reveals the following characteristics regarding persons living in poverty in this assessment area:



Housing Characteristics

According to data from the 2000 U.S. Census Bureau report, there were 77,579 housing units in this assessment area, of which 151 (0.2%) were located in low-income tracts and 2,723 (3.5%) were located in moderate-income tracts, 58,017 (74.8%) were located in middle-income tracts, and 16,688 (21.5%) were located in upper-income tracts. In addition, 48,885 (63.0%) were owner-occupied units, 17,061 (22.0%) were rental units, and 11,633 (15.0%) were vacant units. Further, 58,946 (76.0%) were one-to-four family units, 9,105 (11.7%) were multi-family properties containing five or more units, 9,449 (12.2%) were mobile homes, and 79 (0.1%) were classified as other units.

Bowling Green State University is located in Wood County and the campus is located in the area's low- and moderate-income tracts. This limits Croghan's abilities to lend in those areas.

As of 2000, the median age of housing stock in this assessment area was 33 years old. The following information details the median age of housing stock within the respective counties of this assessment area:

- Henry County – 42 years old
- Ottawa County – 35 years old
- Wood County – 29 years old

The median age of housing stock in this assessment area is younger than the median age of housing stock for the state of Ohio, which is 38 years old. According to the 2000 U.S. Census Bureau report, the median housing value for this assessment area was \$107,892. Data from the Ohio Department of Development estimates that the median housing value for the counties in this area increased to approximately \$136,300 since 2000.

The median gross rent in this assessment area was \$505 according to the 2000 U.S. Census Bureau report. The data also indicates that approximately 14.6% of rental units had monthly rent payments less than \$350, 30.4% of rental units had monthly payments ranging from \$350-\$499, 31.7% of rental units had payments ranging from \$500-\$699, and 15.5% of rental units had monthly payments of at least \$700. Additionally, 34.5% of renters had rental costs exceeding 30% of their incomes. Monthly rental payments were unknown for 7.8% of rental units in this area.

Similar to the Nonmetropolitan Ohio assessment area, this area has also been impacted by the recent recession and has experienced considerable job loss, resulting in higher levels of foreclosures. Data provided by realtytrac.com indicates that as of May 2011, there were 73,046 homes in foreclosure in Ohio. Listed below are the foreclosure statistics for the counties in this assessment area (as of May 2011):

- **Henry County** – One in every 622 housing units received foreclosure filings in May 2011.
- **Ottawa County** – One in every 1,187 housing units received foreclosure filings in May 2011.
- **Wood County** – One in every 601 housing units received foreclosure filings in May 2011.

This information and other demographic characteristics were considered when evaluating Croghan’s lending performance.

Labor, Employment, and Economic Characteristics

The following table illustrates land use in each county in this assessment area.

	Urban	Cropland	Pasture	Forest	Open Water	Wetlands	Bare/Mines
Henry County	2.8%	87.9%	3.2%	5.2%	0.9%	0.1%	0.0%
Ottawa County	8.1%	60.6%	10.9%	7.5%	7.0%	5.2%	0.7%
Wood County	9.4%	80.4%	3.5%	4.5%	0.9%	1.2%	0.1%

This indicates that the majority of land in this assessment area is dedicated to cropland. However, opportunities may exist for lending in urban areas. Major employers in this assessment area include:

Henry County	Campbell Soup Company; Liberty Center Schools; Wal-Mart Stores, Incorporated; Silgan Holding, Incorporated
Ottawa County	Benton-Carroll-Salem Local Schools; First Energy Corporation; Wal-Mart Stores, Incorporated; USG Corporation/US Gypsum Company
Wood County	Bowling Green State University; Cooper Standard Automotive; Chrysler Group LLC, Walgreen Companies

Similar to the Nonmetropolitan Ohio area, this assessment area was greatly impacted by the financial challenges of the Detroit, Michigan automobile industry in recent years. This area lost many automobile-related jobs because of those challenges and many of the jobs have not returned. Other long-term companies also experienced layoffs and budget reductions. The impact of the recession is still felt throughout this assessment area and contributes to the aforementioned high unemployment levels. These factors were considered when evaluating Croghan's lending performance in this area.

Community Contacts

Two community contacts were utilized to assess Croghan's lending performance in this area. One organization provides community services to low-income persons and the other focuses on small business development. Similar to previous comments, community representatives believe that local banks are adequately responding to community credit needs. However, there is a continual need for financial literacy and opportunities exist for small business lending.

The following depicts the demographic characteristics of this assessment area:

Combined Demographics Report

Croghan Colonial Bank

Assessment Area: Toledo MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.5	7	0.0	7	100.0	6,239	13.9
Moderate-income	1	2.5	670	1.5	104	15.5	7,583	16.9
Middle-income	30	75.0	32,849	73.0	1,585	4.8	11,216	24.9
Upper-income	8	20.0	11,470	25.5	327	2.9	19,958	44.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	40	100.0	44,996	100.0	2,023	4.5	44,996	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	151	7	0.0	4.6	142	94.0	2	1.3
Moderate-income	2,723	513	1.0	18.8	2,111	77.5	99	3.6
Middle-income	58,017	36,261	74.2	62.5	11,054	19.1	10,702	18.4
Upper-income	16,688	12,104	24.8	72.5	3,754	22.5	830	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	77,579	48,885	100.0	63.0	17,061	22.0	11,633	15.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	57	0.8	43	0.7	5	1.2	9	1.8
Moderate-income	142	2.0	124	2.0	9	2.1	9	1.8
Middle-income	4,943	69.0	4,294	68.6	288	68.4	361	73.8
Upper-income	2,026	28.3	1,797	28.7	119	28.3	110	22.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,168	100.0	6,258	100.0	421	100.0	489	100.0
Percentage of Total Businesses:			87.3		5.9		6.8	
	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	634	91.8	628	91.7	4	100.0	2	100.0
Upper-income	57	8.2	57	8.3	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	691	100.0	685	100.0	4	100.0	2	100.0
Percentage of Total Farms:			99.1		0.6		0.3	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TEST IN TOLEDO, OHIO MSA 45780

Geographic Distribution of Lending

Croghan's lending performance reflects a reasonable dispersion of lending throughout this assessment area. As previously discussed, this assessment area contains one low-income census tract and one moderate-income census tract; therefore, it is expected that the majority of Croghan's lending in this assessment area would be in middle- and upper-income census tracts. These details were considered in the bank's performance context.

This evaluation revealed no significant lending gaps in this assessment area. In 2009, Croghan originated 98 loans in 27 (67.5%) of this area's 40 census tracts. Two of those loans were made in the moderate-income census tract. In 2010, the bank originated 77 loans in 23 (57.5%) of this area's 40 census tracts. No loans were made in the low- or moderate-income census tracts. While the bank's loan penetration in the middle- and upper-income tracts in this assessment area was less broad than in other assessment areas, competition and the distance from banking offices could impact the bank's ability to penetrate this area as broadly. These factors were also considered in the bank's performance context.

HMDA Lending

Croghan originated no HMDA loans in this area's low-income tract. This aligned with the percentage (0.0%) of owner-occupied units in this tract. The bank also originated no HMDA loans in the moderate-income tract, which was below the percentage (1.0%) of owner-occupied units in this tract.

Croghan made 46 (95.8%) of its HMDA loans in this area's middle-income tracts, which significantly exceeded the percentage (74.2%) of owner-occupied units in these tracts. The bank originated two (4.2%) HMDA loans in upper-income tracts. This was substantially below the percentage (24.8%) of owner-occupied units in these tracts.

Based on this information, Croghan's level of HMDA lending throughout this assessment area is adequate.

Business Lending

Croghan originated no business loans in this area's low-income census tract. This was below the percentage (0.8%) of businesses in these tracts. The bank made one (3.4%) business loans in the moderate-income tract, which exceeded the percentage (2.0%) of businesses located in these tracts.

Croghan originated 28 (96.6%) of its business loans in middle-income tracts. This significantly exceeded the percentage (69.0%) of businesses in these tracts. The bank made no business loans in upper-income tracts, which was substantially below the percentage (28.3%) of businesses in upper-income tracts.

Based on this analysis, Croghan's level of business lending throughout the assessment area is adequate.

Consumer Lending

HELOC

Croghan originated no HELOC loans in the low- or moderate-income tracts. These levels of lending were below the percentages (0.2% and 4.0%, respectively) of low- and moderate-income households in this area.

The bank made 21 (95.5%) HELOC loans in this area's middle-income tracts, which substantially exceeded the percentage (71.9%) of middle-income households in this area. Lastly, the bank made one (4.5%) HELOC loan in an upper-income tract. This was significantly below the percentage (23.9%) of upper-income tracts in the assessment area.

Based on this information, the bank's level of HELOC lending in this assessment area is poor.

Motor Vehicle

Croghan originated no motor vehicle loans in the low- or moderate-income tracts. These levels of lending were below the percentages (0.2% and 4.0%, respectively) of low- and moderate-income households in this area.

The bank made eight (88.9%) of its motor vehicle loans in middle-income tracts, which exceeded the percentage (71.9%) of middle-income households in the area. The bank made one (11.1%) motor vehicle loan in an upper-income tract, which was below the percentage (23.9%) of upper-income households in the assessment area.

Based on this information, the bank's level of motor vehicle lending in this assessment is poor.

Other Secured

Croghan originated no other secured loans in the low- or moderate-income tracts. These levels of lending were below the percentages (0.2% and 4.0%, respectively) of low- and moderate-income households in this area.

The bank originated 31 (86.1%) other secured loans in middle-income tracts, which exceeded the percentage (71.9%) of middle-income households in the assessment area. Croghan made five (13.9%) of its other secured loans in upper-income tracts. This was below the percentage (23.9%) of upper-income households in the area.

Based on this analysis, Croghan's level of other secured lending throughout this assessment area is considered poor.

Unsecured

Croghan originated no unsecured loans in the low-income tract, which was below the percentage (0.2%) of low-income households in this area. The bank made one (5.9%) unsecured loan in the moderate-income tract. This exceeded the percentage (4.0%) of moderate-income households in the area.

The bank originated 15 (88.2%) unsecured loans in middle-income tracts, which exceeded the percentage (71.9%) of middle-income tracts in this area. Croghan made one (5.9%) unsecured loan in an upper-income census tract. This was below the percentage (23.9%) of upper-income households in the assessment area.

Based on this analysis, Croghan's level of unsecured lending throughout this assessment area is considered adequate.

Borrower Distribution of Lending

HMDA Lending

Croghan originated one (2.1%) HMDA loan to a low-income borrower in this area. This was significantly below the percentage (13.9%) of low-income families in this assessment area. The bank originated eight (16.7%) HMDA loans to moderate-income borrowers, which aligned with the percentage (16.9%) of moderate-income families in the assessment area.

Croghan originated seven (14.6%) of its HMDA loans in this area to middle-income borrowers. This was below the percentage (24.9%) of middle-income families in the area. The bank made 31 (64.6%) HMDA loans to upper-income borrowers, which substantially exceeded the percentage (44.4%) of upper-income families in the area. Lastly, Croghan made one (2.1%) HMDA loan where the borrower's income level was unknown.

Based on this information, Croghan's level of HMDA lending to borrowers of different income levels, in this assessment area, is considered adequate.

Business Lending

Croghan originated 22 (75.9%) of its business loans to entities with gross annual revenues of \$1 million or less. This was below the percentage (87.3%) of small businesses in this assessment area.

The bank originated 15 (51.7%) of its business loans for amounts less than or equal to \$100,000. Further, three (10.3%) of its business loans were for amounts greater than \$100,000, but less than or equal to \$250,000. Lastly, Croghan made nine (31.0%) of its business loans for amounts greater than \$250,000, but less than or equal to \$1 million. Business loans for amounts less than \$100,000 are often indicative of small business credit needs. This information further substantiates that Croghan is adequately meeting the needs of small businesses in this area.

Consumer Lending

Motor Vehicle

Croghan originated two (9.1%) HELOC loans to low-income borrowers. This was below the percentage (18.5%) of low-income households in this assessment area. The bank made one (4.5%) HELOC loan to a moderate-income borrower. This was significantly below the percentage (16.1%) of moderate-income households in the assessment area.

The bank made five (22.7%) of its HELOC loans to middle-income borrowers, which exceeded the percentage (19.2%) of middle-income households. Croghan originated 13 (59.1%) HELOC loans to upper-income borrowers, which exceeded the percentage (46.2%) of upper-income households in the assessment area. Lastly, Croghan made one (4.5%) HELOC loan to a borrower whose income level was unknown.

Based on this analysis, Croghan's level of HELOC lending to borrowers of different income levels in this assessment area is considered poor.

Motor Vehicle

Croghan originated one (11.1%) motor vehicle loan to a low-income borrower. This was below the percentage (18.5%) of low-income households in the assessment area. The bank made no motor vehicle loans to moderate-income borrowers. This was substantially below the percentage (16.1%) of moderate-income households in this area.

Croghan originated one (11.1%) motor vehicle loan to a middle-income borrower, which was below the percentage (19.2%) of middle-income households. The bank made six (66.7%) motor vehicle loans to upper-income borrowers, which significantly exceeded the percentage (46.2%) of upper-income households in this area. Lastly, Croghan made one (11.1%) motor vehicle loan to a borrower whose income was unknown.

Based on this analysis, Croghan's levels of motor vehicle lending to borrowers of different income levels, in this assessment area, is considered poor.

Other Secured

Croghan originated ten (27.8%) other secured loans to low-income borrowers. This significantly exceeded the percentage (18.5%) of low-income households in this assessment area. The bank made one (2.8%) other secured loan to a moderate-income borrower, which was substantially below the percentage (16.1%) of moderate-income households in the area.

The bank made seven (19.4%) of its other secured loans to middle-income borrowers, which aligned with the percentage (19.2%) of middle-income households. Croghan originated 18 (50.0%) of its other secured loans to upper-income borrowers, which slightly exceeded the percentage (46.2%) of upper-income households in this area.

Based on this analysis, Croghan's levels of other secured lending to borrowers of different income levels in this assessment area is considered adequate.

Unsecured

Croghan originated five (29.4%) unsecured loans to low-income borrowers. This significantly exceeded the percentage (18.5%) of low-income households in this area. The bank made three (17.6%) unsecured loans to moderate-income borrowers, which exceeded the percentage (16.1%) of moderate-income households in this area.

Croghan originated one (5.9%) unsecured loan to a middle-income borrower. This was significantly below the percentage (19.2%) of middle-income households in this area. The bank originated three (17.6%) unsecured loans to upper-income borrowers, which was significantly below the percentage (46.2%) of upper-income households in this assessment area. Lastly, Croghan made five (29.4%) unsecured loans to borrowers whose income levels were unknown.

Based on this analysis, Croghan's levels of unsecured lending to borrowers of different income levels, in this assessment area, is considered excellent.

Community Development

Community Development Loans

Croghan made no qualified community development loans during this evaluation period.

Community Development Investments

Croghan made no qualified community development investments in this assessment area during this review period.

Community Development Services

Croghan provided qualified community development services to the Salvation Army (Port Clinton, Ohio) and WSOS Community Action Commission. For these activities, employees provided financial expertise to support community services targeted to low-income persons.

The bank also co-sponsored four small business development seminars in conjunction with the State of Ohio and other local financial institutions.

Based on this information and an analysis of the bank's lending volume and community credit needs, Croghan is adequately supporting the community development needs of this assessment area.

APPENDIX A
CORE TABLES

Geographic Distribution of HMDA Loans										
Assessment Area: Overall										
	Total HMDA Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% of Bank Loans	% of Owner Occ Units	% of Bank Loans	% of Owner Occ Units	% of Bank Loans	% of Owner Occ Units	% of Bank Loans
Home Purchase	87	25.4	0.01	0.0	0.6	0.0	76.7	88.5	22.7	11.5
Refinance	208	60.8	0.01	0.0	0.6	0.0	76.7	73.1	22.7	26.9
Home Improvement	47	13.7	0.01	0.0	0.6	0.0	76.7	80.9	22.7	19.1

Borrower Distribution of HMDA Loans										
Assessment Area: Overall										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% of Bank Loans	% of Families	% of Bank Loans	% of Families	% of Bank Loans	% of Families	% of Bank Loans
Home Purchase	87	25.4	13.7	2.3	17.2	24.1	24.6	20.7	44.5	48.3
Refinance	208	60.8	13.7	3.4	17.2	11.5	24.6	26.0	44.5	51.0
Home Improvement	47	13.7	13.7	10.6	17.2	34.0	24.6	14.9	44.5	36.2

Geographic Distribution of Small Loans to Businesses and Farms										
Assessment Area: Overall										
	Total Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses /Farms	% of Bank Loans	% of Businesses /Farms	% of Bank Loans	% of Businesses /Farms	% of Bank Loans	% of Businesses /Farms	% of Bank Loans
Small Business	160	76.6	0.5	0.0	1.2	0.6	74.1	88.1	24.2	11.3
Small Farm	49	23.4	0.0	0.0	0.0	0.0	80.4	81.6	19.6	18.4

Borrower Distribution of Small Loans to Businesses and Farms							
Assessment Area: Overall							
	Total Loans		Businesses/Farms with Revenues of \$1		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses /Farms	% of Bank Loans	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000
Small Business	160	76.6	87.8	63.1	75.6	12.5	10.6
Small Farm	49	23.4	99.1	91.8	83.7	10.2	4.1

Geographic Distribution of Consumer Loans										
Assessment Area: Overall										
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans
HELOC	148	23.3	0.1	0.0	2.4	0.0	76.3	82.4	21.1	17.6
Motor Vehicle	151	23.8	0.1	0.0	2.4	0.0	76.3	85.4	21.1	14.6
Other Secured	125	19.7	0.1	0.0	2.4	0.0	76.3	77.6	21.1	22.4
Unsecured	210	33.1	0.1	0.0	2.4	0.5	76.3	84.8	21.1	14.8

Borrower Distribution of Consumer Loans										
Assessment Area: Overall										
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans
HELOC	148	23.3	17.7	6.1	15.9	14.2	20.1	23.6	46.3	45.9
Motor Vehicle	151	23.8	17.7	18.5	15.9	25.8	20.1	21.9	46.3	26.5
Other Secured	125	19.7	17.7	18.4	15.9	20.0	20.1	24.8	46.3	35.2
Unsecured	210	33.1	17.7	16.7	15.9	13.3	20.1	8.1	46.3	5.7

Geographic Distribution of HMDA Loans						
Assessment Area: Ohio Non MSA						
	Total HMDA Loans		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% of Bank Loans	% of Owner Occ Units	% of Bank Loans
Home Purchase	69	23.5	80.6	87.0	19.4	13.0
Refinance	180	61.2	80.6	69.4	19.4	30.6
Home Improvement	45	15.3	80.6	80.0	19.4	20.0

Borrower Distribution of HMDA Loans										
Assessment Area: Ohio Non MSA										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% of Bank Loans	% of Families	% of Bank Loans	% of Families	% of Bank Loans	% of Families	% of Bank Loans
Home Purchase	69	23.5	13.4	1.4	17.8	27.5	24.1	21.7	44.7	43.5
Refinance	180	61.2	13.4	3.9	17.8	10.6	24.1	28.3	44.7	48.3
Home Improvement	45	15.3	13.4	11.1	17.8	33.3	24.1	13.3	44.7	37.8

Geographic Distribution of Small Loans to Businesses and Farms Assessment Area: Ohio Non MSA						
	Total Loans		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses /Farms	% of Bank Loans	% of Businesses /Farms	% of Bank Loans
Small Business	131	78.9	82.5	86.3	17.5	13.7
Small Farm	35	21.1	66.9	74.3	33.1	25.7

Borrower Distribution of Small Loans to Businesses and Farms Assessment Area: Ohio Non MSA							
	Total Loans		Businesses/Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses /Farms	% of Bank Loans	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000
Small Business	131	78.9	88.6	60.3	80.9	13.0	6.1
Small Farm	35	21.1	99.0	88.6	82.9	8.6	5.7

Geographic Distribution of Consumer Loans Assessment Area: Ohio Non MSA						
	Total Consumer Loans		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Hhlds	% of Bank	% of Hhlds	% of Bank
HELOC	126	22.9	83.2	80.2	16.8	19.8
Motor Vehicle	142	25.8	83.2	85.2	16.8	14.8
Other Secured	89	16.2	83.2	74.2	16.8	25.8
Unsecured	193	35.1	83.2	84.5	16.8	15.5

Borrower Distribution of Consumer Loans Assessment Area: Ohio Non MSA										
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans
HELOC	126	22.9	16.5	5.6	15.6	15.9	21.5	23.8	46.5	43.7
Motor Vehicle	142	25.8	16.5	19.0	15.6	27.5	21.5	22.5	46.5	23.9
Other Secured	89	16.2	16.5	14.6	15.6	27.0	21.5	27.0	46.5	29.2
Unsecured	193	35.1	16.5	15.5	15.6	13.0	21.5	8.3	46.5	4.7

Geographic Distribution of HMDA Loans Assessment Area: 45780 - Toledo, OH										
	Total HMDA Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Owner Occ Units	% of Bank Loans	% of Owner Occ Units	% of Bank Loans	% of Owner Occ Units	% of Bank Loans	% of Owner Occ Units	% of Bank Loans
Home Purchase	18	37.5	0.01	0.0	1.0	0.0	74.2	94.4	24.8	5.6
Refinance	28	58.3	0.01	0.0	1.0	0.0	74.2	96.4	24.8	3.6
Home Improvement	2	4.2	0.01	0.0	1.0	0.0	74.2	100.0	24.8	0.0

Borrower Distribution of HMDA Loans Assessment Area: 45780 - Toledo, OH										
	Total HMDA Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Families	% of Bank Loans	% of Families	% of Bank Loans	% of Families	% of Bank Loans	% of Families	% of Bank Loans
Home Purchase	18	37.5	13.9	5.6	16.9	11.1	24.9	16.7	44.4	66.7
Refinance	28	58.3	13.9	0.0	16.9	17.9	24.9	10.7	44.4	67.9
Home Improvement	2	4.2	13.9	0.0	16.9	50.0	24.9	50.0	44.4	0.0

Geographic Distribution of Small Loans to Businesses and Farms Assessment Area: 45780 - Toledo, OH										
	Total Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses /Farms	% of Bank Loans	% of Businesses /Farms	% of Bank Loans	% of Businesses /Farms	% of Bank Loans	% of Businesses /Farms	% of Bank Loans
Small Business	29	67.4	0.8	0.0	2.0	3.4	69.0	96.6	28.3	0.0
Small Farm	14	32.6	0.0	0.0	0.0	0.0	91.8	100.0	8.3	0.0

Borrower Distribution of Small Loans to Businesses and Farms Assessment Area: 45780 - Toledo, 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	% of Bank Loans	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000
Small Business	29	67.4	87.3	75.9	51.7	10.3	31.0
Small Farm	14	32.6	99.1	100.0	85.7	14.3	0.0

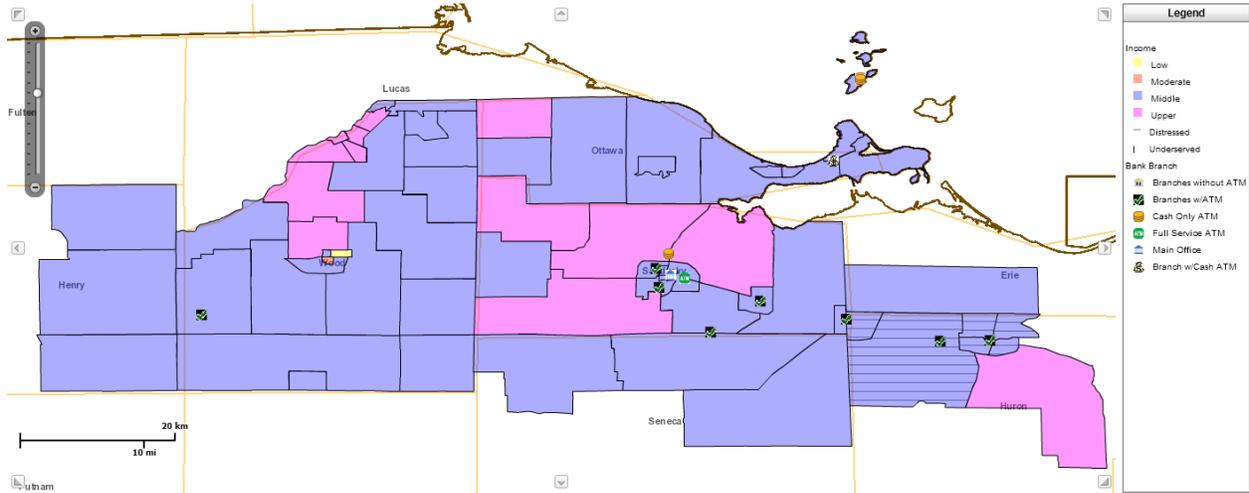
Geographic Distribution of Consumer Loans Assessment Area: 45870 - Toledo, OH										
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans
HELOC	22	26.2	0.2	0.0	4.0	0.0	71.9	95.5	23.9	4.5
Motor Vehicle	9	10.7	0.2	0.0	4.0	0.0	71.9	88.9	23.9	11.1
Other Secured	36	42.9	0.2	0.0	4.0	0.0	71.9	86.1	23.9	13.9
Unsecured	17	20.2	0.2	0.0	4.0	0.0	71.9	88.2	23.9	5.9

Borrower Distribution of Consumer Loans										
Assessment Area: 45780 - Toledo, OH										
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans	% of Hhlds	% of Bank Loans
HELOC	22	26.2	18.5	9.1	16.1	4.5	19.2	22.7	46.2	59.1
Motor Vehicle	9	10.7	18.5	11.1	16.1	0.0	19.2	11.1	46.2	66.7
Other Secured	36	42.9	18.5	27.8	16.1	2.8	19.2	19.4	46.2	50.0
Unsecured	17	20.2	18.5	29.4	16.1	17.6	19.2	5.9	46.2	17.6

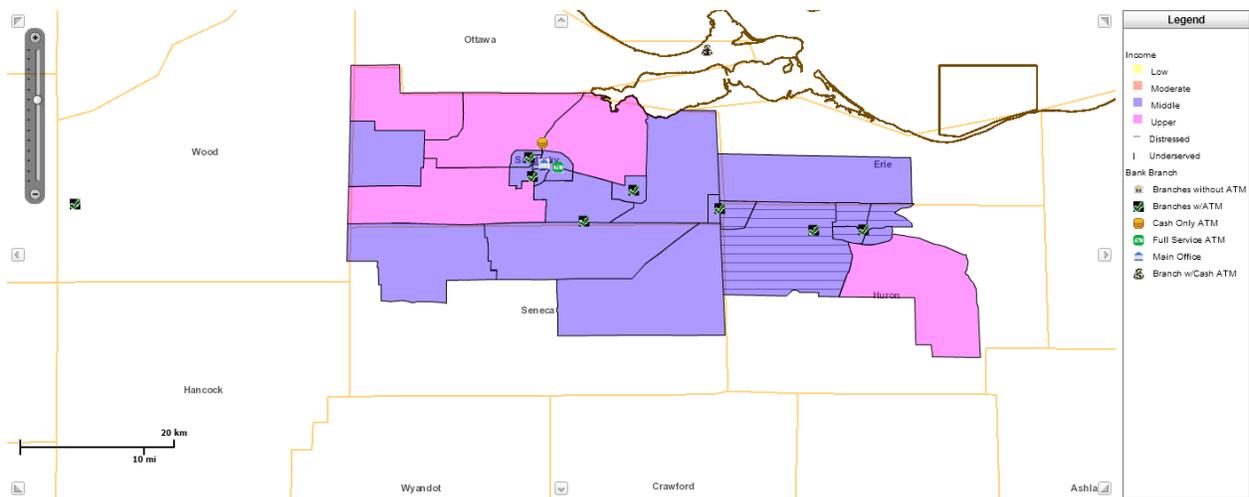
APPENDIX B

ASSESSMENT AREA MAPS

Overall



Nonmetropolitan Ohio Area



Toledo, Ohio MSA 45780

