

PUBLIC DISCLOSURE

October 17, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Cortland Savings and Banking Company
RSSD # 846619

194 West Main Street
Cortland, Ohio 44410

Federal Reserve Bank of Cleveland

P.O. Box 6387
Cleveland, 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: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors and criteria contributing to this rating include:

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

The previous Community Reinvestment Act (CRA) evaluation conducted September 14, 2009 resulted in an overall rating of "Satisfactory."

SCOPE OF EXAMINATION

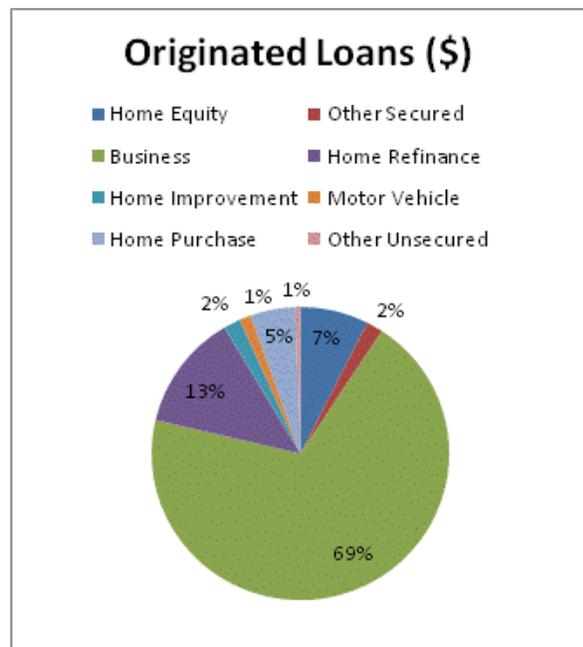
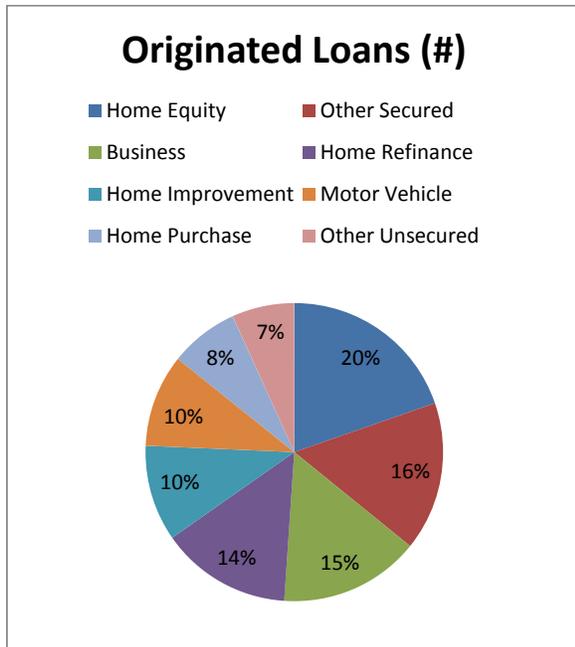
The Cortland Savings and Banking Company (Cortland)'s CRA performance evaluation is based on the level of the bank's lending within its assessment area, including the distribution to borrowers of different income levels and to small businesses of difference revenue sizes. The performance period for the lending test is based on loans originated from January 1, 2010 through June 30, 2011 and the performance period for the bank's community development test is based on activity from September 1, 2009 through September 30, 2011. The CRA evaluation was conducted using the Interagency Intermediate Small Bank examination procedures. Under this method, the bank's CRA performance is evaluated by considering both its lending and community development activities. The lending test includes an analysis of the following:

- The loan-to-deposit ratio;
- The volume of loans extended inside and outside of the bank's assessment area;
- The geographic distribution of loans in the bank's assessment area, including low- and moderate-income census tracts;
- The extent of lending to borrowers of different income levels, including low- and moderate-income borrowers and businesses of different sizes, including small businesses; and,
- The bank's record of taking action in response to written complaints about its performance in helping to meet credit needs in its assessment area.

Under the lending test, the following loan products were evaluated: home equity, other secured, motor vehicle, and other unsecured loans, collectively titled consumer loans; home refinance, home improvement, and home purchase loans, collectively titled Home Mortgage Disclosure Act (HMDA) loans; and business loans.

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 (000s)
Home Equity	200	\$9,483
Other Secured	164	\$2,317
Motor Vehicle	102	\$1,602
Other Unsecured	69	\$708
Business	155	\$88,068
Home Refinance	144	\$16,210
Home Purchase	76	\$6,223
Home Improvement	106	\$2,339
Total Loans	1016	\$126,950



Given the above distribution, consumer loans received the greatest weight in this analysis, as these loans represent 53.0% of all loans originated by volume and 11.0% by dollar volume, followed business loans at 15.0% by volume and 69% by dollar volume and HMDA loans at 32.0% by volume and 20.0% by dollar volume.

Additionally, interviews with community representatives were used to provide some perspective on the credit needs of Cortland’s assessment area. Information from the interviews was supplemented with demographic and economic data pertinent to the area.

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

DESCRIPTION OF INSTITUTION

Cortland is a full-service retail bank headquartered in Cortland, Ohio. As of June 30, 2011, Cortland's total assets were valued at approximately \$481 million, which is a decrease of 2.4% from \$493 million as of March 31, 2009.

In addition to its main office, Cortland has 13 branch offices and 13 full-service ATMs. Cortland has no stand-alone or cash-only ATMs. Cortland has no branch offices or ATMs located in low-income tracts; however, Cortland has one branch office with a full-service ATM located in a moderate-income tract in Windham, Ohio (Akron MSA). The majority of Cortland's branch offices are located in middle-income tracts, where there are nine branch offices with full-service ATMs and one branch office with no ATM. Lastly, Cortland's main office and two branch offices with full-service ATMs are located in upper-income tracts. No branches have opened, closed, or relocated since the previous performance evaluation.

Cortland is a full-service retail bank offering consumer and business deposit accounts and consumer, commercial, and residential mortgage loans. As of June 30, 2011, Cortland had \$257 million in net loans and leases, which represents 53.4% of 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	2,133	0.8%	860	0.3%	7,171	2.9%
Secured by One- to Four- Family Dwellings	66,740	26.0%	69,196	26.3%	75,473	30.7%
Other Real Estate: Farmland	419	0.2%	426	0.2%	439	0.2%
Multifamily	4,114	1.6%	4,229	1.6%	4,467	1.8%
Nonfarm nonresidential	144,359	56.2%	141,591	53.8%	114,869	46.8%
Commercial and Industrial	32,720	12.7%	39,925	15.2%	35,579	14.5%
Loans to Individuals	6,298	2.5%	7,069	2.7%	7,641	3.1%
Agricultural Loans	20	0.0%	0	0.0%	66	0.0%
Total	\$256,803	100.00%	\$263,296	100.00%	\$245,705	100.00%

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

Cortland's investment portfolio as of June 30, 2011 was \$186 million, which represents 38.6% of total assets. Investments in U.S. Treasuries and Agencies account for 67.7% of investments and municipal securities account for 18.5% of investments, while all other securities and interest-bearing bank balances account for the remaining 13.7% of bank's total investments.

DESCRIPTION OF ASSESSMENT AREA

Cortland's CRA footprint lies within five counties in the state of Ohio. The bank has delineated the following four assessment areas for the purposes of this evaluation:

- Youngstown-Warren-Boardman Metropolitan Statistical Area 49660, comprised of the entireties of Trumbull and Mahoning Counties.
- Akron Metropolitan Statistical Area 10420, comprised of 31 of 35 census tracts in Portage County.
- Cleveland-Elyria-Mentor Metropolitan Statistical Area 17460, comprised of seven of 21 census tracts in the southeastern portion of Geauga County.
- Nonmetropolitan Ohio Area, comprised of two of 21 census tracts in Ashtabula County. These two tracts border Trumbull County.

Overall, Cortland's assessment area has 174 total tracts, none of which are designated as distressed or underserved. There are 14 low-income census tracts, 34 moderate-income census tracts, 102 middle-income census tracts, 23 upper-income census tracts, and one unknown income census tract. The majority of assessment area's total census tracts (77.0%) and low- and moderate-income census tracts (91.7%) are located in the Youngstown-Warren-Boardman MSA. The table below shows the census tract distribution of Cortland's assessment area.

There is a significant amount of competition throughout the bank's assessment area from both large- and peer-sized banks. According to the FDIC Deposit Market Share Report,¹ as of June 30, 2011, Cortland ranked 15th out of 36 institutions in the market with a deposit share of 1.8%. FirstMerit Bank was first with a 14.1% deposit share and 41 offices in the assessment area, Huntington National Bank ranked second with a 14.1% deposit share and 58 offices in the assessment area, and PNC Bank ranked third with a 11.1% deposit share and 45 offices in the assessment area.

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

JPMorgan Chase Bank, KeyBank, First Place Bank, Home Savings & Loan, RBS Citizens National Bank, Fifth Third Bank, Farmers National Bank of Canfield, Middlefield Banking Company, Third Federal Savings and Loan of Cleveland, New York Community Bank, and US Bank all had higher deposit shares than Cortland.

Population Characteristics

According to the 2000 U.S. Census, the population within Cortland’s assessment area was approximately 654,573 people. About 18.2% of the population lives in either low- or moderate-income census tracts. In addition, 75.6% of the population is 18 years of age or older, which is the legal age to enter into a contract.

The largest county in the assessment area by population is Mahoning County, which includes the city of Youngstown within its boundaries. Shown in the table below is the projected population by county in Cortland’s assessment area and how it is expected to change over the next 20 years. Both Trumbull and Mahoning Counties are projected to lose population over the next 20 years, while Geauga County’s population is projected to increase by 16.9% during this time period. This information was obtained from the Ohio Department of Development’s Office of Policy, Research and Strategic Planning.²

County	Population 2010	Projected Population 2020	Projected Population 2030
Trumbull	210,312	211,100	200,990
Mahoning	238,823	235,350	226,800
Portage	161,419	161,660	161,880
Gauga	93,389	104,810	109,180
Ashtabula	101,497	106,090	106,420

Income Characteristics

According to 2000 U.S. Census data, the median family income in the bank’s assessment area was \$46,866, compared to Ohio’s median family income at \$50,037. Low- and moderate-income families each represent approximately 18.4% of all families in the assessment area. In the bank’s assessment area, 8.2% of families were below the poverty level, compared to Ohio’s rate at 7.8%. Ohio’s median family income increased to \$61,400 based on 2010 HUD data. The following table³ shows the U.S. Department of Housing and Urban Development’s 2011 estimated median family income for each of the counties within the bank’s assessment area.

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

3 www.ffiec.gov/census/default.aspx

County	HUD's 2011 Estimated Median Family Income
Trumbull	\$54,900
Mahoning	\$54,900
Portage	\$65,600
Geauga	\$62,800
Ashtabula	\$52,900

According to 2000 U.S. Census data, in the assessment area, there are 253,834 households, of which 174,889 (68.9%) are designated as families. Of these households, 11.3% were below the poverty level, compared to Ohio's rate at 10.7%.

Household poverty rates for assessment area are shown below. Overall poverty rates have substantially increased within the bank's assessment area over the last ten years, particularly within Trumbull and Mahoning Counties. These rates were obtained from the Economic Research Service of the United States Department of Agriculture (USDA)'s website.⁴

County	1999 Poverty Rate	2009 Poverty Rate
Trumbull	10.3%	16.0%
Mahoning	12.5%	18.3%
Portage	9.3%	14.3%
Geauga	4.6%	7.9%
Ashtabula	12.1%	17.5%
Ohio	10.6%	15.1%
National	12.4%	14.3%

Housing Characteristics

According to 2000 U.S. Census data, there were 273,197 housing units in the assessment area, with the majority of units (111,762) or 40.9% located in Mahoning County, based on the 2000 U.S. Census. Within the assessment area, 67.8% of the units were owner-occupied, 25.2% were rental units, and 7.1% were vacant. Geauga County had the highest owner-occupancy rate at 84.2%. Each of the remaining counties in the assessment area had owner-occupancy rates over 67.0%. From an income perspective, 18.6% of housing units and 13.0% of owner-occupied homes were located in either low- or moderate-income census tracts. These figures suggest mortgage credit demand in low- and moderate-income areas might be lower. Overall, there is not a concentration of either multi-family or mobile home units in the bank's assessment area, as only 11.4% and 4.9% of the total housing units are multi-family or mobile homes, respectively.

The median age of housing stock was 40 years, as of the 2000 U.S. Census, with 30.9% of housing built prior to 1950. Older homes such as these are typically more likely to require repairs and rehabilitation.

⁴ www.ers.usda.gov/Data/PovertyRates

According to the 2000 U.S. Census data, the median housing value in the assessment area was \$89,003 and an affordability ratio of 42.0%, as the higher the affordability ratio, the more affordable a home is considered. Affordability ratios fluctuated from a high of 45.0% in Trumbull County to a low of 33.0% in Geauga County.

From a rental perspective, the median gross rent in the assessment area was \$473, with 20.1% of the rental units having rents of less than \$350 a month, according to the 2000 U.S. Census. The majority of rents (31.8%) in the assessment area had rents of \$350 to less than \$500 per month. Also, 27.7% of the rental units had rents between \$500 and \$699 and 12.2% had rental costs greater than \$700 per month. Additionally, 34.3% of renters have rent costs greater than 30.0% of their income. Portage County had the highest rent costs, as 37.3% of renters have rent costs greater than 30.0% of their income.

Labor, Employment, and Economic Characteristics

According to the Ohio Department of Job and Family Services,⁵ trade, transportation and utilities; education and health services; local government; manufacturing, and professional and business services were the leading employment sectors in the assessment area based on average annual employment for 2008.

The following chart outlines the unemployment rate by county in the bank's assessment area, according to the Ohio Department of Job and Family Services:⁵

Unemployment Rate (%) (not seasonally adjusted)	
County	As of September 2011
Trumbull	9.0%
Mahoning	9.1%
Portage	8.0%
Geauga	5.7%
Ashtabula	9.8%
Ohio	8.5%
National	8.8%

The following table illustrates the demographics of Cortland's entire assessment area.

⁵ www.lmi.state.oh.us/laus/laus.html

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	14	8.0	4,937	2.8	1,753	35.5	32,110	18.4
Moderate-income	34	19.5	21,816	12.5	4,402	20.2	32,263	18.4
Middle-income	102	58.6	113,143	64.7	7,306	6.5	40,006	22.9
Upper-income	23	13.2	34,993	20.0	943	2.7	70,510	40.3
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	174	100.0	174,889	100.0	14,404	8.2	174,889	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	9,783	3,860	2.1	39.5	4,001	40.9	1,922	19.6
Moderate-income	40,902	20,209	10.9	49.4	15,549	38.0	5,144	12.6
Middle-income	172,954	121,732	65.8	70.4	41,189	23.8	10,033	5.8
Upper-income	49,558	39,302	21.2	79.3	8,037	16.2	2,219	4.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	273,197	185,103	100.0	67.8	68,776	25.2	19,318	7.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	819	3.2	669	3.0	79	5.0	71	5.0
Moderate-income	2,700	10.6	2,289	10.2	223	14.1	188	13.2
Middle-income	15,520	61.0	13,830	61.6	890	56.3	800	56.2
Upper-income	6,375	25.0	5,644	25.1	373	23.6	358	25.2
Unknown-income	42	0.2	21	0.1	15	0.9	6	0.4
Total Assessment Area	25,456	100.0	22,453	100.0	1,580	100.0	1,423	100.0
	Percentage of Total Businesses:			88.2		6.2		5.6

Based on 2000 Census Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

The bank is rated “Satisfactory” under the lending test.

Loan-to-Deposit Ratio

A financial institution’s loan-to-deposit (LTD) ratio compares the institution’s aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of the institution’s lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing the total by the number of quarters. The following table illustrates Cortland’s quarterly LTD ratios for eight quarters since the previous performance evaluation, along with the average LTD ratio for the same period. In addition to Cortland’s ratios, the table below also includes the national peer bank ratios. Cortland’s peer group consists of all insured commercial banks having assets between \$300 million and \$1 billion. A custom peer group is made up of two local financial institutions with a similar asset and branch size as Cortland.

Loan-to-Deposit Ratios					
As of Date	Bank Ratio	Peer Ratio	MBC⁶	AB⁷	Custom Peer
June 30 2011	65.42	76.65	63.84	57.58	60.71
March 31 2011	66.30	76.49	62.76	58.15	60.46
December 31 2010	67.06	78.87	62.93	62.50	62.72
September 30 2010	61.18	79.69	61.40	59.71	60.56
June 30 2010	63.23	80.44	64.25	61.71	62.98
March 31 2010	62.41	80.87	65.12	62.26	63.69
December 31 2009	63.30	82.64	69.12	63.63	66.38
September 30 2009	61.49	84.75	73.79	66.17	69.98
Quarterly LTD Ratio since the Previous Exam	63.80	80.05	65.40	61.46	63.43

Cortland’s LTD ratio is reasonable given the bank’s size, financial condition, and assessment area credit needs. The bank averaged 63.8% over the past eight quarters of operation and is below the aggregate peer group average ratio of 80.1%, but similar to the custom peer group average ratio of 63.4%. The bank’s LTD ratio has historically lagged behind the aggregate of all lenders and has continued to do so over the recent eight quarters. The bank did not experience extreme fluctuations in its LTD ratio since the previous performance evaluation period, when the average LTD ratio was 60.1%.

6 The Middlefield Banking Company, Middlefield, Ohio

7 The Andover Bank, Andover, Ohio

Lending in the Assessment Area

The following table illustrates that 91.8% of loans were made inside the bank’s assessment area. Further, a majority (71.0%) of loans, by dollar amount, were also made inside the assessment area. As a result, a substantial majority of the bank’s lending was made inside its assessment area.

Lending Inside and Outside the Assessment Area

Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Equity	192	96.0	\$9,040	95.3	8	4.0	\$443	4.7
Motor Vehicle	91	89.2	\$1,476	92.1	11	10.8	\$126	7.9
Other - Secured	140	85.4	\$1,973	85.2	24	14.6	\$344	14.8
Other - Unsecured	67	97.1	\$632	89.2	2	2.9	\$77	10.8
Total Consumer related	490	91.6	\$13,121	93.0	45	8.4	\$990	7.0
Home Improvement	104	98.1	\$2,220	94.9	2	1.9	\$119	5.1
Home Purchase	69	90.8	\$5,314	85.4	7	9.2	\$909	14.6
Refinancing	133	92.4	\$14,594	90.0	11	7.6	\$1,616	10.0
Total HMDA related	306	93.9	\$22,128	89.3	20	6.1	\$2,644	10.7
Business	137	88.4	\$54,913	62.4	18	11.6	\$33,155	37.6
Total Bus. related	137	88.4	\$54,913	62.4	18	11.6	\$33,155	37.6
TOTAL LOANS	933	91.8	\$90,162	71.0	83	8.2	\$36,789	29.0

Geographic and Borrower Distribution

Both the bank’s geographic and borrower distribution is considered reasonable. Refer to each assessment area’s performance ratings for further details.

Cortland’s geographic dispersion of lending and the distribution of lending to borrowers of different income levels and businesses of different revenue sizes were weighted equally. While 27.7% of the bank’s CRA footprint consists of low- and moderate-income geographies, mostly located in an urban area, current economic conditions make lending in these areas challenging. Therefore, weighing the bank’s ability to make loans to low- and moderate-income borrowers is equally as important. Nevertheless, lending patterns in low- and moderate-income geographies are always given more weight than lending in middle- and upper-income geographies.

Response to Consumer Complaints

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

Community Development Test

The bank is rated “Satisfactory” under the community development test.

During this evaluation period, Cortland originated nine community development loans aggregating \$14.2 million. While this demonstrates an excellent overall level of qualified community development lending, the activity was limited to the Youngstown MSA.

Cortland made a total of 41 donations/investments totaling \$1.26 million inside the bank’s overall assessment area, demonstrating an adequate level of meeting the community development needs. Additionally, investments totaling \$2.24 million were made outside the assessment area.

Included in these totals are two outstanding mortgage-backed securities with a current balance of \$232,750 and an investment totaling approximately \$1.02 million from the previous evaluation period, all of which benefited the assessment area. In total, the bank had four outstanding mortgage-backed securities with a current balance of approximately \$2.2 million from the previous evaluation period with balances not benefiting the assessment area. While these mortgage-backed securities all benefited Ohio, the funds were outside of Cortland’s CRA footprint.

While five Cortland employees provided financial expertise to three organizations with community development purposes, this level of activity demonstrates a poor level of qualified services.

Specific details of community development activities are discussed in the respective assessment area sections.

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.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN YOUNGSTOWN-WARREN-BOARDMAN, OHIO MSA 49660

The Youngstown-Warren-Boardman MSA 49660 consists of Mahoning and Trumbull Counties in Ohio and Mercer County in Pennsylvania; however, this assessment area is comprised only of the entireties of Mahoning and Trumbull Counties and will be referred to as Youngstown MSA. This assessment area consists of a total of 134 census tracts comprised of 14 low-income census tracts, 30 moderate-income census tracts, 69 middle-income tracts, 20 upper-income tracts, and one unknown income tract.

According to the June 30, 2011 FDIC Deposit Market Share Report, Cortland ranked seventh out of 14 institutions in the market with a deposit share of 5.0% in Mahoning and Trumbull Counties. Huntington National Bank was first with a 24.3% deposit share and 30 offices in the Youngstown MSA, First Place Bank ranked second with a 17.3% deposit share and 19 offices in the Youngstown MSA, and Home Savings & Loan ranked third with a 13.5% deposit share and 14 offices in the Youngstown MSA. PNC Bank, JPMorgan Chase Bank, and Farmers National Bank of Canfield all had higher deposit shares than Cortland.

Population Characteristics

The Youngstown MSA's population growth is declining. According to U.S. Census Bureau data,⁸ the population decreased by 6.9% from 482,671 in 2000 to 449,135 in 2010. The population is projected to be 446,450 in 2020,⁹ a further decrease of 0.6% from 2010. Although 20.5% of the population lives in low- and moderate-income census tracts, the majority of the population (58.0%) lives in middle-income census tracts and 16.8% of the total population is age 65 or older.

Youngstown is the largest city in Mahoning County. According to U.S. Census Bureau data, the population decreased by 18.4% from 82,026 in 2000 to 66,971 in 2010.

Warren is the largest city in Trumbull County. According to the Census Bureau data, the population decreased by 11.26% from 46,832 in 2000 to 41,557 in 2010.

Income Characteristics

Based on the 2000 U.S. Census, the median family income for the Youngstown MSA is \$45,160, which is below Ohio's median family income of \$50,037. The median household income for the Youngstown MSA is \$36,745, which is below Ohio's median household income of \$40,956.

There are 191,610 households in the Youngstown MSA, of which 131,205 are designated as families and 11,561 (8.8%) of families are below poverty. The number of families living below poverty level as a percentage of families by tract income is as follows: 35.5% reside in low-income and 21.2% reside in moderate-income tracts; only 6.5% and 2.7% of families living below poverty level reside in middle- and upper-income tracts, respectively.

⁸ www.census.gov

⁹ <http://development.ohio.gov/research/files/s0.htm>

Of households in the Youngstown MSA receiving public assistance, over half are concentrated in low- and moderate-income tracts; specifically, 18.0% are in low-income tracts and 35.2% are in moderate-income tracts. Of the renters with a rent cost greater than 30.0% of their income, 8.7%, 28.3%, and 51.7% reside in low-, moderate-, and middle-income tracts, respectively.

Housing Characteristics

According to the 2000 U.S. Census, there are 206,879 housing units in the Youngstown MSA, of which 89.2% are one-to-four family units, 68.1% are owner-occupied, 24.6% are rental units, and 7.4% are vacant. Of the total housing units, 39.5% are owner-occupied units located in low-income tracts, 51.1% are owner-occupied units located in moderate-income tracts, 71.1% are owner-occupied units located in middle-income tracts, and 79.6% are owner-occupied units located in upper-income tracts.

The median age of the housing stock is 43 years, with the oldest housing stock in low-income tracts at 56 years and 54 years in moderate-income tracts. The housing stock in middle- and upper-income tracts is 43 and 28 years, respectively. The age of the housing stock for these areas should indicate an opportunity for home improvement-type lending in low- and moderate-income tracts. However, given that 24.6% of the housing units are rental units (with 40.9% of these located in low-income tracts and 35.8% located in moderate-income tracts) and 7.4% are vacant, it can be assumed that there is a less likely chance of home improvement to these properties. Thus the values will be lower and the opportunity for home equity-type loans is lower and the demand for mortgage credit within the Youngstown MSA (particularly in low- and moderate-income tracts) might be lower.

According to data published by the city of Youngstown¹⁰, there are 168 housing units without plumbing and 620 overcrowded units, which are known indicators of housing quality and can lower home values and condition. Therefore, the opportunity for Cortland to make home improvement and home equity-type loans in low- and moderate-income tracts could be lacking due to the area's low housing values.

The median gross rent in the Youngstown MSA was \$453, with 22.4% of the rental units having rents of less than \$350 per month, according to the 2000 U.S. Census. Another 34.2% of rental units had rents of \$350-\$499 per month, 25.9% of rental units had rents \$500-\$699 per month, and 8.9% of rental units had rents of over \$700 per month (8.6% of rents were unknown). 33.6% of renters had rent costs greater than 30.0% of median family income in the Youngstown MSA, which means rents are equivalent to Ohio's rate at 33.8%. The median gross rent amount in the assessment area is \$453, which is slightly less than Ohio's at \$515 and the percent of rental units in this assessment area is slightly less than Ohio's at 28.7%.

¹⁰ http://www.cityofyoungstownoh.org/Uploads/2011317132726_Youngstown%202010-2014%20consolidated%20Plan.pdf

The housing affordability ratio, calculated by dividing median family income by median housing value was 44% in the Youngstown MSA. This figure supports the fact that there is an oversupply of older, lower-value housing stock in this MSA when compared to Ohio's ratio at 40.0%. The median housing value in the Youngstown MSA is \$82,237. Further, based on the 2010 median family income for the Youngstown MSA (\$53,500), about 54.2% of the homes valued up to \$87,203 in the Youngstown MSA would be considered affordable for low-income individuals and approximately 82.36% of the homes valued up to \$139,525 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,¹¹ the median cost of a home in Youngstown, Warren, and Boardman is \$43,700, \$71,300, and \$108,700, respectively. The homes in Warren appreciated by 2.49% over the last year, while home values in Youngstown and Boardman depreciated by 2.33% and 2.30%, respectively. The depreciating values in Youngstown and Boardman could attribute to fewer opportunities for home equity-based lending in these areas.

According to RealtyTrac,¹² an online real estate marketplace and data company that tracks foreclosure statistics, foreclosure filings were reported on 8,545 Ohio housing units (one in every 596 Ohio housing units) in September 2011. While Ohio's rate has dropped over the past few years, Ohio still resides among the top states in the nation for overall foreclosures. 136 housing units in Trumbull County (one in every 715 housing units) received foreclosure notices and 236 units in Mahoning County (one in every 483 housing units) received foreclosure notices in September 2011, bringing the current county totals to 1,026 and 2,037, respectively. In Ohio, Trumbull County ranked 15th and Mahoning County ranked ninth in total foreclosures during the month of September. These high foreclosure figures could attribute to fewer opportunities for home purchase lending in these areas.

Labor, Employment, and Economic Characteristics

According to the Ohio Department of Development (ODD),¹³ in Trumbull County, only 16.5% of the land is considered urban, meaning it is residential, commercial, industrial, transportation, or urban grasses. The remaining 83.5% is cropland, pasture, forest, and water. Similarly, in Mahoning County only 22.9% of the land is urban. This large amount of land that does not contain housing, businesses, and schools may impact Cortland's ability to originate all types of loans in this assessment area.

According to the ODD, Mahoning County's top employers are the Austintown and Boardman Local School Districts, Forum Health, HM Health Partners, and InfoCision Management. For Mahoning County, the largest industries by average employment are trade, transportation, and utilities; education and health services; professional and business services; local government; and manufacturing.

11 <http://www.bestplaces.net/>

12 <http://www.realtytrac.com/home/>

13 <http://development.ohio.gov/research/files/s0.htm>

The largest industries by average weekly corresponding salaries are federal government (\$1,136), state government (\$869), construction (\$850), natural resources and mining (\$835), and information (\$794).

According to ODD, Trumbull County's top employers are Delphi Corporation, Forum Health, General Motors, Giant Eagle, and HM Health Partners. For Trumbull County, the largest industries by average employment are manufacturing; trade, transportation, and utilities; education and health services; local government; and professional and business services. The largest industries by average weekly corresponding salaries are manufacturing (\$1,262), federal government (\$1,001), state government (\$909), information (\$904), and construction (\$731).

The table below lists the unadjusted unemployment rates for Mahoning and Trumbull Counties as well as for the state of Ohio and the U.S.

Unadjusted Unemployment Rate	September 2011	September 2010	Change
Mahoning County	9.10%	10.40%	-12.50%
Trumbull County	9.00%	10.50%	-14.29%
Ohio	8.50%	9.40%	-9.57%
U.S.	8.80%	9.20%	-4.35%

Although the level of unemployment has decreased, it is still above both the state and national levels. This gap can likely be attributed to the fact that manufacturing is still a major sector in these counties' economies. According to Ohio Labor Market Information Leading Indicators Report from August 2011,¹⁴ the Youngstown-Warren-Boardman MSA economic indicator index decreased, indicating sluggish employment growth through the coming months. Total nonfarm payroll employment declined to 225,600 jobs on a seasonally adjusted basis and there were 1,782 initial claims for unemployment compensation. The total valuation of housing permits fell to \$3.2 million, which is lower than this time last year.

According to the U.S. Conference of Mayors¹⁵ report released on June 20, 2011 entitled, "Slow Return to Pre-Recession Job Levels in Cities," metropolitan cities in the Rust Belt, including Youngstown, are not expected to recover from the unemployment rates until the end of the decade. Overall, the high unemployment rate in the Youngstown MSA could have a negative impact on the bank's ability to lend in the area.

In addition, because the Youngstown MSA includes the cities of Youngstown and Warren, it is important to understand how the challenges presented by these cities impact the bank's ability to serve its community. One community contact was conducted in Mahoning County with a non-profit economic development corporation. The community contact indicated that there is a significant need for lending to start up business ventures and working capital for existing businesses, particularly with businesses that are not able to offer traditional forms of collateral (such as technological ventures).

14 <http://ohiolmi.com/PROJ/indicators/LI.pdf>

15 <http://www.usmayors.org/pressreleases/>

Although there is a growing shale-drilling industry in Mahoning County, there is very little other activity increasing the number of jobs. Another contact revealed that a similar economic development corporation in Youngstown is not even able to offer any incentives to new and existing businesses in Youngstown due to funding cuts and the area in general is struggling economically.

The following table illustrates the demographics in the Youngstown MSA.

Assessment Area Demographics

Assessment Area: Youngstown-Warren-Boardman, Ohio MSA 49660

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	14	10.4	4,937	3.8	1,753	35.5	24,340	18.6
Moderate-income	30	22.4	18,403	14.0	3,908	21.2	24,012	18.3
Middle-income	69	51.5	77,909	59.4	5,089	6.5	29,157	22.2
Upper-income	20	14.9	29,956	22.8	811	2.7	53,696	40.9
Unknown-income	1	0.7	0	0.0	0	0.0	0	0.0
Total Assessment Area	134	100.0	131,205	100.0	11,561	8.8	131,205	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	9,783	3,860	2.7	39.5	4,001	40.9	1,922	19.6
Moderate-income	34,035	17,378	12.3	51.1	12,179	35.8	4,478	13.2
Middle-income	120,337	85,568	60.8	71.1	27,733	23.0	7,036	5.8
Upper-income	42,724	33,988	24.1	79.6	6,900	16.2	1,836	4.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	206,879	140,794	100.0	68.1	50,813	24.6	15,272	7.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	819	4.4	669	4.1	79	6.8	71	6.9
Moderate-income	2,301	12.4	1,946	11.9	198	17.1	157	15.2
Middle-income	9,830	53.2	8,793	53.9	543	47.0	494	47.9
Upper-income	5,502	29.8	4,878	29.9	320	27.7	304	29.5
Unknown-income	42	0.2	21	0.1	15	1.3	6	0.6
Total Assessment Area	18,494	100.0	16,307	100.0	1,155	100.0	1,032	100.0
	Percentage of Total Businesses:			88.2		6.2		5.6

Based on 2000 Census Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Geographic Distribution of Lending

An analysis of the geographic distribution of loans was conducted to determine the dispersion of loans among different census tracts within the Youngstown MSA. Cortland's geographic distribution of loans reflects an adequate dispersion throughout the Youngstown MSA. The bank's performance for geographic distribution in low- and moderate-income tracts for the most part fell below the demographics within the Youngstown MSA, as well as the lending for the aggregate of all HMDA lenders.

During the evaluation period, Cortland originated \$11.5 million in consumer loans, \$54.4 million in business loans, and \$18.9 million in HMDA loans in the Youngstown MSA. This represented 94.1% of Cortland's total lending activity inside the assessment area. The percentage of loans is higher than the percentage of bank branches (71.4%) in the Youngstown MSA. Cortland ranks 11th in HMDA loan originations among 203 HMDA reporters in the Youngstown MSA.

This analysis includes a breakdown of each individual product type. In addition, the bank's HMDA performance was compared to the aggregate performance of all lenders required to report HMDA data within the Youngstown MSA for the year 2010.

The tracts in the Youngstown MSA represent 77.0% of Cortland's assessment area. Within these 134 tracts, 44 (32.8%) are low- and moderate-income tracts and 90 (67.2%) are middle-, upper-, and unknown-income tracts.

During this evaluation period, Cortland originated 795 loans in 89 (66.4%) census tracts within the Youngstown MSA. The majority of loans were made within middle- and upper-income tracts. This seems reasonable considering the bank does not have any branches in the Youngstown MSA located in low- or moderate-income tracts and the poor economic conditions of these urban geographies. As a result, Cortland only penetrated 29.5% of the low- and moderate-income tract geographies within the Youngstown MSA and only 5.2% of the loans originated in the Youngstown MSA were made in these geographies.

Additionally, Youngstown State University is located on 140 acres in Youngstown, Ohio. The university is located in at least one low-income tract, resulting in the bank not being able to extend credit in this tract. Student housing is located in various surrounding tracts and affects the number of lending opportunities in the area, given that college students are not likely borrowers, especially for HMDA and business lending. Other establishments located in low- and/or moderate-income tracts affecting the bank's ability to lend in these areas are the Ohio State Penitentiary, the Mahoning County Jail, the Northeast Ohio Correctional Center and Saint Elizabeth Medical Clinic all located in Youngstown, Ohio; and the Trumbull County Jail located in Warren, Ohio.

The majority of tracts without loans are located within the city limits of Youngstown, which is a considerable distance from the nearest branch offices in Mahoning County. Overall, this area has low housing values and high unemployment rates; therefore, the lending gaps noted in this evaluation are considered reasonable given these factors and information discussed in the aforementioned performance context.

Consumer Loans

The percentage of households contained within the designated census tracts is used as a proxy to estimate demand for consumer lending within such census tracts.

Home Equity

Cortland originated 164 home equity loans for approximately \$7.8 million during this evaluation period. No home equity loans were made in low-income census tracts, which is lower than the 4.1% of households in low-income tracts. Four (2.4%) of the bank's home equity loans were made in moderate-income tracts, which is lower than the 15.4% of households in moderate-income tracts. Based on this analysis and considering the performance context (including the obstacles faced with home equity-type lending in the assessment area), the bank's lending in low- and moderate-income tracts is considered adequate.

There were 99 (60.4%) home equity loans made in middle-income tracts, which is greater than the 59.2% of households in middle-income tracts. There were 61 (37.2%) home equity loans made in upper-income tracts, which is greater than the 21.3% of households in upper-income tracts.

Other Secured

Cortland originated 119 other secured loans for approximately \$1.8 million during this evaluation period. No other secured loans were made in low-income census tracts, which is lower than the 4.1% of households in low-income tracts. Four (3.4%) of the bank's other secured loans were made in moderate-income tracts, which is lower than the 15.4% of households in moderate-income tracts. Based on this analysis and the performance context, the bank's lending in low- and moderate-income tracts is considered adequate.

There were 86 (72.3%) other secured loans made in middle-income tracts, which is greater than the 59.2% of households in middle-income tracts. There were 29 (24.4%) other secured loans made in upper-income tracts, which is greater than the 21.3% of households in upper-income tracts.

Motor Vehicle

Cortland originated 61 motor vehicle loans for approximately \$1.3 million during this evaluation period. No motor vehicle loans were made in low- or moderate-income census tracts, which is lower than the 4.1% and 15.4% of households in low- and moderate-income tracts, respectively. Based on this analysis, the bank's lending in low- and moderate-income census tracts is considered poor.

There were 46 (75.4%) motor vehicle loans made in middle-income tracts, which is greater than the 59.2% of households in middle-income tracts. There were 15 (24.6%) motor vehicle loans made in upper-income tracts, which is greater than the 21.3% of households in upper-income tracts.

Other Unsecured

Cortland originated 61 other unsecured loans for approximately \$594 thousand during the evaluation period. No other unsecured loans were made in low-income census tracts, which is lower than the 4.1% of households in low-income tracts. One (1.6%) of the bank's other unsecured loans were made in moderate-income tracts, which is lower than the 15.4% of households in moderate-income tracts. Based on this analysis, the bank's lending in low- and moderate-income tracts is considered poor.

There were 33 (54.1%) other secured loans made in middle-income tracts, which is less than the 59.2% of households in middle-income tracts. There were 27 (44.3%) other secured loans made in upper-income tracts, which is greater than the 21.3% of households in upper-income tracts.

Business Loans

The geographic distribution of business loans was analyzed to determine the dispersion of these loans among different census tracts within the Youngstown MSA, including low- and moderate-income tracts. Penetration throughout the Youngstown MSA is considered good.

During the evaluation period, Cortland originated 135 loans in an aggregate amount of \$54.4 million, of which 12 (8.9%) were made in low-income tracts, which was more than the 4.1% of businesses located in these tracts. Sixteen loans (11.9%) were made in moderate-income tracts, which is the same as the 11.9% of businesses located in these tracts. Therefore, the bank's lending in low- and moderate-income tracts was considered good.

The bank originated 42.2% and 37.0% of its business loans in middle- and upper-income tracts, compared to the percent of businesses located in these tracts at 53.9% and 29.9%, respectively.

Overall, the bank exceeds proxy with lending in low-income tracts and is the same as proxy lending in moderate-income tracts.

HMDA Loans

The percentage of owner-occupied housing units contained within the various income categories is used as a proxy to estimate demand for residential mortgage lending within such census tracts. In the Youngstown MSA, 13.9% and 32.2% of households are below poverty and 18.1% and 35.2% of households are receiving public assistance in low- and moderate-income tracts, respectively. A lower level of owner-occupied units, coupled with higher levels of poverty, public assistance, and low housing values limits the bank's lending opportunities in those tracts.

Home Refinance

Cortland originated 116 refinance loans for approximately \$12.7 million during this evaluation period. The bank made no refinance loans in low-income tracts, while 2.7% of owner-occupied units are located in the bank's low-income tracts and the lending of the aggregate of all lenders was 0.2%. The bank made no refinance loans in moderate-income tracts, while 12.3% of owner-occupied units are located in the bank's moderate-income tracts and the lending of the aggregate of all lenders was 2.3%. Although the bank made no home refinance loans in low- or moderate-income tracts, based on the percentage of households below poverty and the percentage of households receiving public assistance and considering that the aggregate lending level was also low, the bank's lending in low- and moderate-income tracts is considered adequate.

The bank originated 66 (56.9%) refinance loans in middle-income tracts, which was lower than the percentage of owner-occupied housing units at 60.8% and higher than the lending for the aggregate of all lenders at 54.9%. The bank originated 50 (43.1%) refinance loans in upper-income tracts, which was higher than the percentage of owner-occupied housing units at 24.1% and lending for the aggregate of all lenders at 42.6%.

Home Improvement

Cortland originated 78 home improvement loans for approximately \$1.5 million during this evaluation period. The bank made no home improvement loans in low-income tracts, while 2.7% of owner-occupied units are located in the bank's low-income tracts and the lending of the aggregate of all lenders was 1.6%. The bank made one (1.3%) refinance loan in moderate-income tracts, while 12.3% of owner-occupied units are located in the bank's moderate-income tracts and the lending of the aggregate of all lenders was 7.5%. Based on the percentage of households below poverty and the percentage of households receiving public assistance, the bank's lending in low- and moderate-income tracts is considered adequate.

The bank originated 60 (76.9%) home improvement loans in middle-income tracts, which was higher than the percentage of owner-occupied housing units at 60.8% and higher than the lending for the aggregate of all lenders at 62.4%. The bank originated 17 (21.8%) home improvement loans in upper-income tracts, which was lower than the percentage of owner-occupied housing units at 24.1% and lending for the aggregate of all lenders at 28.5%.

Home Purchase

Cortland originated 61 home purchase loans for approximately \$4.8 million during this evaluation period. The bank made no home purchase loans in low-income tracts, while 2.7% of owner-occupied units are located in the bank's low-income tracts and the lending of the aggregate of all lenders was 0.4%. The bank made three (4.9%) home purchase loans in moderate-income tracts, while 12.3% of owner-occupied units are located in the bank's moderate-income tracts and the lending of the aggregate of all lenders was 3.9%. Based on the percentage of households below poverty and the percentage of households receiving public assistance, the bank's lending in low- and moderate-income tracts is considered adequate.

The bank originated 35 (57.4%) home purchase loans in middle-income tracts, which was lower than the percentage of owner-occupied housing units at 60.8% and the lending for the aggregate of all lenders at 58.0%. The bank originated 23 (37.7%) home purchase loans in upper-income tracts, which was higher than the percentage of owner-occupied housing units at 24.1% and lending for the aggregate of all lenders at 37.6%.

Overall, the bank is below proxy in all instances, but similar to peer with home purchase and refinance loans in low-income tracts, above peer with home purchase loans in moderate-income tracts, and below peer with refinance loans in moderate-income tracts and home improvement loans in low- and moderate-income tracts.

Borrower Distribution

Consumer, business, and HMDA lending data was analyzed in conjunction with the demographic and economic characteristics of the assessment area to determine the extent of lending to borrowers of different incomes and to businesses of different sizes. The bank's performance for borrower distribution for the most part was either comparable or exceeded the demographics within the Youngstown MSA and the aggregate of all lenders. Therefore, Cortland's borrower distribution of loans reflects a good dispersion throughout the Youngstown MSA and an adequate distribution of lending to businesses with revenues of \$1 million or less.

Consumer Loans

The percentage of households is used as a proxy to estimate demand for consumer lending among borrowers of different income levels.

Home Equity

The bank made 15 (9.1%) home equity loans to low-income borrowers, which was less than the 22.9% of households. The bank made 18 (11.0%) home equity loans to moderate-income borrowers, which is less than the 16.4% of households. Lending to low- and moderate-income borrowers is considered adequate.

There were 28.7% of home equity loans made to middle-income borrowers, which was greater than the 18.9% of households. There were 37.8% of home equity loans made to upper-income borrowers, which was less than the 41.8% of households. 13.4% of home equity loans were made to borrowers with unknown income levels.

Other Secured

There were 19 (16.0%) other secured loans made to low-income borrowers, which is less than the 22.9% of households. There were 16 (13.4%) other secured loans made to moderate-income borrowers, which is less than the 16.4% of households. Lending to low- and moderate-income borrowers is considered adequate.

There were 10.1% of other secured loans made to middle-income borrowers, which was less than the 18.9% of households. There were 20.2% of other secured loans made to upper-income borrowers, which was less than the 41.8% of households. 40.3% of other secured loans were made to borrowers with unknown income levels.

Motor Vehicle

The bank made 11 (18%) motor vehicle loans to low-income borrowers, which is less than the 22.9% of households. There were 16 (26.2%) motor vehicle loans made to moderate-income borrowers, which is greater than the 16.4% of households. Lending to low- and moderate-income borrowers is considered good.

There were 23.0% of motor vehicle loans made to middle-income borrowers, which was more than the 18.9% of households. There were 24.6% of motor vehicle loans made to upper-income borrowers, which was less than the 41.8% of households. 8.2% of motor vehicle loans were made to borrowers with unknown income levels.

Other Unsecured

The bank made eight (13.1%) other unsecured loans to low-income borrowers, which is less than the 22.9% of households. There were 14 (23.0%) other unsecured loans made to moderate-income borrowers, which is greater than the 16.4% of households. Lending to low- and moderate-income borrowers is considered good.

There were 16.4% of other unsecured loans made to middle-income borrowers, which was less than the 18.9% of households. There were 41.0% of other unsecured loans made to upper-income borrowers, which was similar to the 41.8% of households. 6.6% of other unsecured loans were made to borrowers with unknown income levels.

Overall, bank lending is below proxy to low-income borrowers and to moderate-income borrowers for home equity and other secured loans, but exceeds proxy in motor vehicle and other unsecured lending to moderate-income borrowers.

Business Loans

Cortland originated 14 loans (aggregating \$4.2 million) to ten different entities under the Ohio GrowNOW Program in the Youngstown MSA. This is a program offered through the Ohio Treasurer's office that is designed to help small businesses grow by providing them with critical cash flow. When a business is approved for a loan through an eligible bank in the state, GrowNOW provides an additional 3.0% discount on the loan's already-negotiated interest rate when the loan is linked to economic development in Ohio. The treasury places a certificate of deposit with the bank at a reduced rate. The bank agrees to pass along the interest rate savings of 3.0% to the small business owner's loan.

An analysis of business lending was conducted to ascertain the extent of lending to businesses of different sizes, including small businesses. Cortland's distribution of loans to small businesses reflects an adequate penetration. Of the 135 business loans, 69 (51.1%) were originated to businesses with less than \$1 million in revenue (small business), compared to 88.2% of total businesses in the Youngstown MSA with revenues less than \$1 million. It should be noted that a number of loans during the evaluation period were to businesses with \$1 million or less in revenue, however the assets of the affiliates were used in making the credit decision as an abundance of caution for the small businesses and therefore the assets of the affiliate were reported.

A further analysis shows that only 38.5% of the bank's business loans were extended in an amount of \$100,000 or less. Smaller loans are generally commensurate with the borrowing needs of smaller businesses. Based on this analysis, it appears that Cortland's lending activity of smaller dollar loans could be improved toward meeting the credit needs of such businesses.

HMDA Loans

Cortland originated loans in the Youngstown MSA under special programs. One of these loans was made under the Welcome Home Program and another loan was made under the United States Department of Agriculture (USDA) Rural Development Housing Program. The Welcome Home Program (through The Federal Home Loan Bank of Cincinnati) assists low- and moderate-income homebuyers purchase primary residences. The USDA Program provides Section 502 loans used to help low-income individuals or households build, purchase, renovate, or relocate homes in rural areas. A third loan was made with funding from both the Welcome Home and the USDA Programs.

The percentage of families for each income category is used as a proxy to estimate demand for HMDA lending within the Youngstown MSA. The bank's distribution of borrowers reflects a reasonable penetration among borrowers of different income levels, considering the credit needs of the low- and moderate-income segment of the population are difficult to address through conventional loan products, presenting a significant obstacle to homeownership. In particular, 33.6% of the Youngstown MSA's renters expend more than 30.0% of gross income for housing, making it difficult for renters to save the customary down payment and closing costs necessary to purchase a home. Additionally, 8.8% of families residing in the Youngstown MSA live below the poverty level.

Home Refinance

Cortland originated seven (6.0%) refinance loans to low-income borrowers, which is less than the percentage of families in these tracts at 18.6%, yet greater than the aggregate of all lenders at 5.3%. Cortland originated 19 (16.4%) refinance loans to moderate-income borrowers, which is less than the percentage of families in these tracts at 18.3%, yet greater than the aggregate of all lenders at 16.0%. The borrower distribution of refinance loans to low- and moderate-income borrowers is considered good.

Cortland made 25.0% of its refinance loans to middle-income borrowers and 49.1% of its refinance loans to upper-income borrowers, compared to the percentage of families in these tracts at 22.2% and 40.9%, respectively, and the aggregate of all HMDA lenders at 24.9% and 41.5%, respectively. The bank originated four (3.4%) refinance loans to borrowers of unknown incomes.

Home Improvement

Cortland originated 15 (19.2%) home improvement loans to low-income borrowers, which is greater than the percentage of families in these tracts at 18.6% and greater than the aggregate of all lenders at 14.2%. Cortland originated 24 (30.8%) home improvement loans to moderate-income borrowers, which is greater than the percentage of families in these tracts at 18.3% and greater than the aggregate of all lenders at 24.1%. The borrower distribution of home improvement loans to low- and moderate-income borrowers is considered excellent.

Cortland made 33.3% of its home improvement loans to middle-income borrowers and 15.4% of its home improvement loans to upper-income borrowers, compared to the percentage of families in these tracts at 22.2% and 40.9%, respectively, and the aggregate of all HMDA lenders at 27.2% and 32.3%, respectively. The bank originated one (1.3%) home improvement loan to a borrower of unknown income.

Home Purchase

Cortland originated 12 (19.7%) home purchase loans to low-income borrowers, which is greater than the percentage of families in these tracts at 18.6% and greater than the aggregate of all lenders at 12.1%. Cortland originated 14 (23.0%) home purchase loans to moderate-income borrowers, which is greater than the percentage of families in these tracts at 18.3%, but less than the aggregate of all lenders at 25.2%. The borrower distribution of home purchase loans to low- and moderate-income borrowers is considered excellent.

Cortland made 27.9% of its home purchase loans to middle-income borrowers and 29.5% of its home purchase loans to upper-income borrowers, compared to the percentage of families in these tracts at 22.2% and 40.9%, respectively, and the aggregate of all HMDA lenders at 24.2% and 28.4%, respectively.

Overall, the bank's lending exceeds peer lending to low-income borrowers for all products and exceeds proxy lending for home improvement loans and home purchase loans. For lending to moderate-income borrowers, the bank exceeds peer and is just below proxy for home refinance loans, exceeds proxy and peer for home improvement loans, and exceeds proxy and is just below peer for home purchase loans.

Community Development Test

Cortland's community development performance in the Youngstown MSA demonstrates an adequate responsiveness to the community development needs of its assessment area through qualified community development loans, investments, and services. Consideration is given to Cortland's capacity and the need and availability of community development opportunities in its assessment area. The review period for all community development loans, investments, and services was from September 1, 2009 through September 30, 2011.

Community Development Loans

For the evaluation period, Cortland originated community development loans benefitting the Youngstown MSA aggregating \$14.2 million. This total amount was made up of nine different loans to four different entities. The primary purpose for three of the loans was for the revitalization and economic development of mixed use commercial, retail, and residential space in downtown Youngstown. Two of the loans had a primary purpose of affordable housing. Two of the loans were for revitalization and services to low- and moderate-income individuals. The remaining two loans had the primary purpose of economic development and qualified under the SBA 504 loan program. The bank made an excellent level of community development loans within the Youngstown MSA.

Community Development Investments

For the evaluation period, Cortland had 15 investments/donations to various organizations in the Youngstown MSA totaling \$1.12 million. Two of these investments were from the previous evaluation, a mortgage-backed security secured by home loans made to low- or moderate-income borrowers with \$95,200 that benefitted the Youngstown MSA and a municipal bond assisting a local school district (primarily comprised of low- and moderate-income students), the balance of which during the evaluation period was \$1.02 million.

Cortland also made 13 qualified donations aggregating \$5,697.

The following list is an example of organizations where Cortland made donations:

- Heart Reach Ministries – targets the Youngstown area and directs its services to low- and moderate-income children in inner city Youngstown. Also supports Head Start programs.
- Kinsman Area Rotary Club – donations benefit low- and moderate-income students with financial aid for higher education and supports local food banks.

- Kiwanis of the Western Reserve – donations went toward providing area needy children with a backpack, school supplies, and clothing/shoes for back to school.
- Ohio Foundation of Independent Colleges – donations benefit low- and moderate-income students in the Mahoning Valley area attending Ohio colleges.
- Renaissance Family Center – service benefitting community members in a low- to moderate-income area that provides after school tutoring, free dinners for the community, and a summer program that includes free lunches for kids.
- Second Harvest Food Bank – food bank.
- SCORE – an SBA-affiliated organization that provides free one-on-one counseling as well as workshops and classes to new and existing business owners covering various aspects of entrepreneurship.
- The Salvation Army – donations go toward local area food cupboards and for holiday gifts for area needy children.

Cortland has an adequate level of community development investments and donations within this assessment area.

Community Development Services

Cortland's employees participate in services by providing explicit financial expertise to organizations with community development-related purposes. Services were provided in 2010 and 2011 for The Ohio State University Extension's Real Money, Real World program in low- and moderate-income school districts to provide financial education for kids. Two employees each participated in six of these programs during this evaluation period.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN AKRON, OHIO MSA 10420

The Akron, Ohio MSA 10420 consists of the entireties of Portage and Summit Counties; however, the bank's assessment area only consists of 31 out of 35 census tracts in Portage County and will be referred to as Akron MSA.

A limited-scope review was conducted for Akron MSA, since Cortland only has two branches in this assessment area and lending volume was too low to evaluate for a meaningful analysis.

During the evaluation period and within the Akron MSA, Cortland originated 101 loans in ten (32.3%) census tracts in the Akron MSA. Cortland originated 22 home equity loans, 18 motor vehicle loans, 13 other secured loans, and six other unsecured loans totaling approximately \$1.2 million. Cortland originated eight home purchase loans, 11 refinance loans, and 22 home improvement loans totaling approximately \$2.5 million and one small business loan totaling \$14 thousand. Overall, Cortland ranked 29th in HMDA loan originations among 189 HMDA reporters in the Akron MSA.

Cortland has two branch offices and full-service ATMs in the Akron MSA. According to the June 30, 2011 FDIC Deposit Market Share Report, Cortland ranked 12th out of 16 institutions in the market with a deposit share of 1.8% within Portage County. Huntington National Bank was first with a 28.33% deposit share and nine offices in Portage County, Portage Community Bank was second with a 13.7% deposit share and two offices in Portage County, and JPMorgan Chase Bank was third with a 13.1% deposit share and six offices in Portage County. Home Savings Bank, KeyBank, Middlefield Banking Company, First Place Bank, Fifth Third Bank, PNC National Bank, First Merit Bank, and Park View Bank all had higher deposit shares than Cortland.

Two community contacts were conducted within the Akron MSA. The first contact was with an organization that provides counseling and financial services to starting and existing businesses via one-on-one counseling sessions and classes and workshops. Although the contact believes the Akron area did not fare as badly as other Ohio cities during the economic downturn, the contact feels there is a need for business financing for both large and small businesses from both large and small banks. The contact noted that during this time where credit is tight, there is an increased need for working lines of credit for both new and existing businesses. The second contact was an organization that offers consumer credit and homeownership counseling. The contact noted a significant level of unemployment and an increased level of those who have ceased looking for employment totally that would not be reflected in the unemployment figures. The contact also has seen an increase in bankruptcy filings and consumers in consumer credit trouble. The contact believes there is a need for low dollar loans as well as both secured and unsecured consumer credit. Additionally, the contact would like to see banks offering classes that teach consumers about re-establishing credit, providing financial literacy classes, and attempting to bank the unbanked and low- and moderate-income individuals.

The following table illustrates the demographics in the Akron MSA.

Assessment Area Demographics

Assessment Area: Akron, Ohio MSA 10420

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	5,960	17.5
Moderate-income	4	12.9	3,413	10.0	494	14.5	6,285	18.5
Middle-income	24	77.4	25,516	75.1	1,488	5.8	8,440	24.8
Upper-income	3	9.7	5,037	14.8	132	2.6	13,281	39.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	31	100.0	33,966	100.0	2,114	6.2	33,966	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	6,867	2,831	8.3	41.2	3,370	49.1	666	9.7
Middle-income	38,766	26,068	76.2	67.2	10,792	27.8	1,906	4.9
Upper-income	6,834	5,314	15.5	77.8	1,137	16.6	383	5.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	52,467	34,213	100.0	65.2	15,299	29.2	2,955	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	399	7.6	343	7.4	25	7.5	31	10.6
Middle-income	3,972	75.7	3,510	76.0	255	76.6	207	70.9
Upper-income	873	16.6	766	16.6	53	15.9	54	18.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,244	100.0	4,619	100.0	333	100.0	292	100.0
	Percentage of Total Businesses:			88.1		6.4		5.6

Based on 2000 Census Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Cortland made loans in the Akron MSA under the Welcome Home Program and the USDA Rural Development Housing Program. The bank originated a loan that also had additional Welcome Home funds included in the Akron MSA. Additionally, Kent State University is located on 866 acres in Kent, Ohio. The university is located in some moderate-income tracts, which results in the bank not being able to extend credit in these tracts. Student housing is located in various surrounding tracts that affects the number of lending opportunities in the area given that college students are not likely borrowers, especially for HMDA and business lending.

Donations were made to nine organizations totaling \$1,466; however, no services were provided in the Akron MSA.

The bank's performance as it relates to the lending test in the Akron MSA was found to be consistent with the bank's lending in its other assessment areas. However, the bank's performance as it related to community development lending, investments, and services were found to be below the bank's community development activities in other assessment areas.

Facts and data reviewed, including performance and demographic information, can be found in the core tables accompanying this report.

Assessment Area	Lending Test	Community Development Test
Akron MSA	Consistent	Below

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ASHTABULA, OHIO NONMETROPOLITAN AREA

Cortland's assessment area in Ashtabula County consists of two middle-income census tracts located in the southernmost portion of the county (bordering Trumbull County) and will be referred to as Ashtabula Nonmetropolitan Area.

A limited-scope review was conducted for Ashtabula nonmetropolitan area, since Cortland only has one branch in this assessment area, which has only two middle-income census tracts and low lending volume.

During the evaluation period, Cortland originated 21 loans in both census tracts in this assessment area. Cortland originated three home equity loans, seven motor vehicle loans, and five other secured loans totaling approximately \$188,000. Cortland originated five refinance loans and one home improvement loan totaling approximately \$521,000. Cortland did not originate any other unsecured loans, small business loans, or home purchase loans in the assessment area.

Overall, Cortland ranked 12th in HMDA loan originations among 51 HMDA reporters in the Ashtabula Nonmetropolitan Area.

Cortland has one branch office and no ATMs in this assessment area. According to the June 30, 2011 FDIC Deposit Market Share Report, Cortland ranked last of nine institutions in the market with a deposit share of 0.91% within Ashtabula County. Andover Bank was first with a 26.3% deposit share and seven offices in Ashtabula County, KeyBank ranked second with a 21.4% deposit share and six offices in Ashtabula County, and FirstMerit Bank ranked third with a 16.1% deposit share and five offices in Ashtabula County. Huntington National Bank, US Bank, Conneaut Savings Bank, Northwest Savings Bank, and Middlefield Banking Company all had higher deposit shares than Cortland.

One community contact was conducted in Ashtabula County with an economic development and growth organization. The contact noted that the area experiences typical micro-urban problems such as decaying neighborhoods, crime, and poverty. Additionally, there is higher unemployment in the dock areas due to job cuts. The contact also noted some credit availability restrictions.

The following table illustrates the demographics in the Ashtabula Nonmetropolitan Area.

Assessment Area Demographics

Assessment Area: Ashtabula, 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	823	20.9
Moderate-income	0	0.0	0	0.0	0	0.0	726	18.5
Middle-income	2	100.0	3,930	100.0	365	9.3	980	24.9
Upper-income	0	0.0	0	0.0	0	0.0	1,401	35.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2	100.0	3,930	100.0	365	9.3	3,930	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	6,036	4,165	100.0	69.0	1,072	17.8	799	13.2
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	6,036	4,165	100.0	69.0	1,072	17.8	799	13.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	599	100.0	534	100.0	18	100.0	47	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	599	100.0	534	100.0	18	100.0	47	100.0
	Percentage of Total Businesses:			89.1		3.0		7.8

Based on 2000 Census Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Cortland had an investment from the previous evaluation (a mortgage-backed security secured by home loans made to low- and moderate-income borrowers) with an outstanding balance totaling \$137,550 for two properties located in Ashtabula County.

Two employees provided financial expertise to low- and moderate-income students in a local school district via FETCH!, a program that teaches kids about managing daily finances.

The bank's performance as it relates to the lending test in this assessment area was found to be consistent with the bank's lending in its other assessment areas. However, the bank's performance as it related to community development lending, investments, and services were found to be below the bank's community development activities in other assessment areas.

Facts and data reviewed, including performance and demographic information, can be found in the core tables accompanying this report.

Assessment Area	Lending Test	Community Development Test
Ashtabula Nonmetropolitan Area	Consistent	Below

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CLEVELAND-ELYRIA-MENTOR, OHIO MSA 17460

The Cleveland-Elyria-Mentor, Ohio MSA 17460 consists of Cuyahoga, Geauga, Lake, Lorain, and Medina Counties; however, the assessment area consists of only seven middle-income census tracts located in the southeast quadrant of Geauga County. This assessment area will be referred to as Cleveland MSA.

A limited-scope review was conducted for Cleveland MSA, since Cortland only has one branch in this assessment area, consists of only middle-income geographies, and the lending volume was too low to evaluate for a meaningful analysis.

During this evaluation period, Cortland originated 16 loans in five census tracts (71.4%) in the Cleveland MSA. Cortland originated three home equity loans, five motor vehicle loans, and three other secured loans totaling approximately \$230,000. Cortland originated one refinance loan and three home improvement loans totaling approximately \$129,000, and originated one small business loan totaling approximately \$500,000. Cortland did not originate any other unsecured loans or home purchase loans with this assessment area. Overall, Cortland ranked 32nd in HMDA loan originations among 72 HMDA reporters in the Cleveland MSA.

Cortland has one branch office and one full-service ATM in the Cleveland MSA. According to the June 30, 2011 FDIC Deposit Market Share Report, Cortland ranked 15th out of 16 institutions in the market with a deposit share of 0.32% in Geauga County. Middlefield Banking Company was first with a 17.9% deposit share and four offices in Geauga County, Huntington National Bank ranked second with a 15.9% deposit share and five offices in Geauga County, and Geauga Savings Bank ranked third with a 13.4% deposit share and one office in Geauga County. PNC National Bank, RBS Citizens National Bank, JPMorgan Chase Bank, KeyBank, Fifth Third Bank, First Merit Bank, Park View Bank, Citizens Bank, First National Bank of Pennsylvania, US Bank, and Home Savings & Loan all had higher deposit shares than Cortland.

One community contact was conducted within Geauga County. The community contact was an economic development corporation that offers programs geared toward low- and moderate-income individuals and families; including fair housing, foreclosure prevention, revolving loan funds, and financial literacy workshops. The contact believes the largest challenges are the amount of affordable housing in areas where there are also jobs and public transportation. In Geauga County, affordable housing is located further away from jobs and transportation. The contact has seen an increase in foreclosures and the demand for foreclosure assistance and prevention has increased.

The following table illustrates the demographics in the Cleveland MSA.

Assessment Area Demographics

Assessment Area: Cleveland-Elyria-Mentor, Ohio MSA 17460

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	987	17.1
Moderate-income	0	0.0	0	0.0	0	0.0	1,240	21.4
Middle-income	7	100.0	5,788	100.0	364	6.3	1,429	24.7
Upper-income	0	0.0	0	0.0	0	0.0	2,132	36.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7	100.0	5,788	100.0	364	6.3	5,788	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	7,815	5,931	100.0	75.9	1,592	20.4	292	3.7
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	7,815	5,931	100.0	75.9	1,592	20.4	292	3.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	1,119	100.0	993	100.0	74	100.0	52	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,119	100.0	993	100.0	74	100.0	52	100.0
	Percentage of Total Businesses:			88.7		6.6		4.6

Based on 2000 Census Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Cortland made seven donations totaling \$535 to five organizations benefitting this assessment area during this review period. In regards to qualified community development services, an employee provided financial expertise to the Middlefield Chamber of Commerce, which promotes economic development in the area.

The bank's performance as it relates to the lending test in the Cleveland MSA was found to be consistent with the bank's lending in its other assessment areas. However, the bank's performance as it related to community development lending, investments, and services was found to be below the bank's community development activities in other assessment areas.

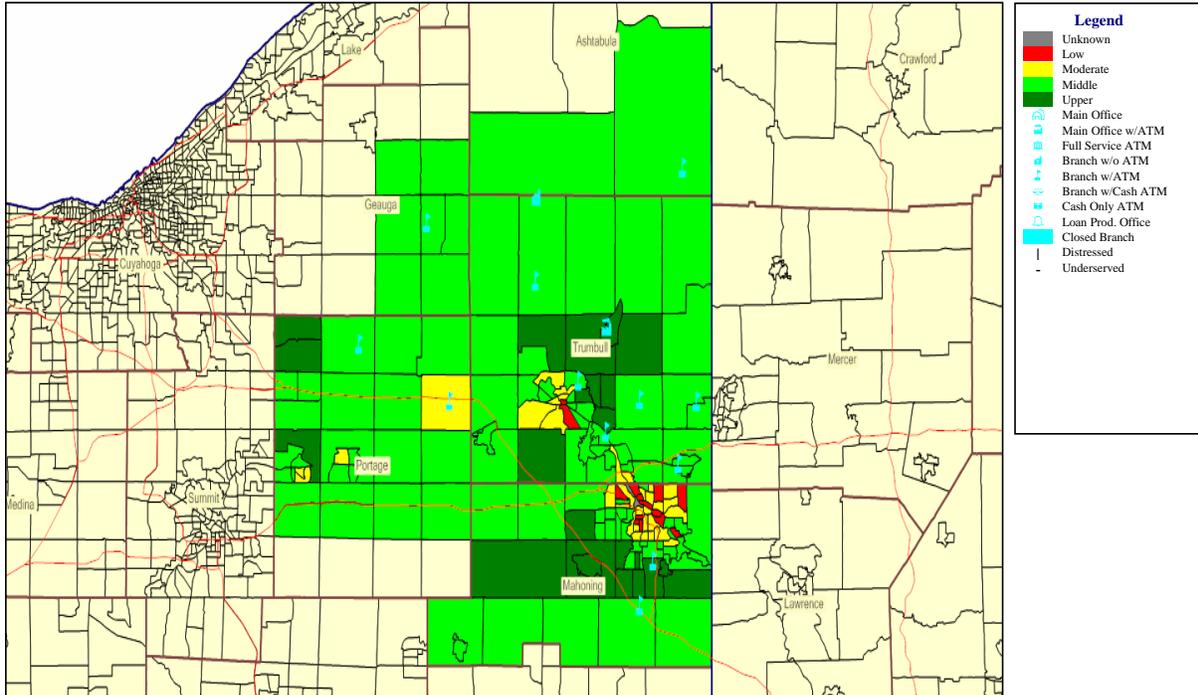
Facts and data reviewed, including performance and demographic information, can be found in the core tables accompanying this report.

Assessment Area	Lending Test	Community Development Test
Cleveland MSA	Consistent	Below

APPENDIX A

ASSESSMENT AREA MAPS

Cortland Bank
Assessment Area: Overall



APPENDIX B

CORE TABLES

Borrower Distribution of HMDA Loans

Assessment Area: Overall

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank		Demographics		Families by Family Income %
		Count		\$ (000s)		
#	%	\$	%			
HMDA TOTALS	Low	38	12.4%	\$1,204	5.4%	18.4%
	Moderate	71	23.2%	\$3,064	13.8%	18.4%
	Middle	89	29.1%	\$5,101	23.1%	22.9%
	Upper	102	33.3%	\$12,185	55.1%	40.3%
	Unknown	6	2.0%	\$574	2.6%	0.0%
	<i>Total</i>	306	100.0%	\$22,128	100.0%	100.0%
HOME PURCHASE	Low	13	18.8%	602	11.3%	18.4%
	Moderate	17	24.6%	964	18.1%	18.4%
	Middle	19	27.5%	1,326	25.0%	22.9%
	Upper	20	29.0%	2,422	45.6%	40.3%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	69	100.0%	5,314	100.0%	100.0%
REFINANCE	Low	7	5.3%	381	2.6%	18.4%
	Moderate	23	17.3%	1,611	11.0%	18.4%
	Middle	35	26.3%	3,126	21.4%	22.9%
	Upper	64	48.1%	8,933	61.2%	40.3%
	Unknown	4	3.0%	543	3.7%	0.0%
	<i>Total</i>	133	100.0%	14,594	100.0%	100.0%
HOME IMPROVEMENT	Low	18	17.3%	221	10.0%	18.4%
	Moderate	31	29.8%	489	22.0%	18.4%
	Middle	35	33.7%	649	29.2%	22.9%
	Upper	18	17.3%	830	37.4%	40.3%
	Unknown	2	1.9%	31	1.4%	0.0%
	<i>Total</i>	104	100.0%	2,220	100.0%	100.0%

Originations & Purchases

Geographic Distribution of HMDA Loans

Assessment Area: Overall

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank				Demographics
		Count		\$ (000s)		Owner Occupied Units %
		#	%	\$	%	%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	14	4.6%	\$333	1.5%	2.1%
	Middle	202	66.0%	\$13,362	60.4%	10.9%
	Upper	90	29.4%	\$8,433	38.1%	65.8%
	Unknown	0	0.0%	\$0	0.0%	21.2%
	<i>Total</i>	<i>306</i>	<i>100.0%</i>	<i>\$22,128</i>	<i>100.0%</i>	<i>0.0%</i>
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	6	8.7%	\$222	4.2%	2.1%
	Middle	40	58.0%	\$3,335	62.8%	10.9%
	Upper	23	33.3%	\$1,757	33.1%	65.8%
	Unknown	0	0.0%	\$0	0.0%	21.2%
	<i>Total</i>	<i>69</i>	<i>100.0%</i>	<i>\$5,314</i>	<i>100.0%</i>	<i>0.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.1%
	Middle	83	62.4%	\$8,198	56.2%	10.9%
	Upper	50	37.6%	\$6,396	43.8%	65.8%
	Unknown	0	0.0%	\$0	0.0%	21.2%
	<i>Total</i>	<i>133</i>	<i>100.0%</i>	<i>\$14,594</i>	<i>100.0%</i>	<i>0.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	8	7.7%	\$111	5.0%	2.1%
	Middle	79	76.0%	\$1,829	82.4%	10.9%
	Upper	17	16.3%	\$280	12.6%	65.8%
	Unknown	0	0.0%	\$0	0.0%	21.2%
	<i>Total</i>	<i>104</i>	<i>100.0%</i>	<i>\$2,220</i>	<i>100.0%</i>	<i>0.0%</i>

Originations & Purchases

Business Loans by Business Revenue & Loan Size

Assessment Area: Overall

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank				Total Businesses
		Count		\$ (000s)		
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	70	51.1%	\$23,000	41.9%	88.2%
	Over \$1 Million	62	45.3%	\$28,521	51.9%	6.2%
	<i>Total where Rev is available</i>	<i>132</i>	<i>96.4%</i>	<i>\$51,521</i>	<i>93.8%</i>	<i>94.4%</i>
	Rev. Not Known	5	3.6%	\$3,392	6.2%	5.6%
	<i>Total</i>	<i>137</i>	<i>100.0%</i>	<i>\$54,913</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	53	38.7%	\$2,279	4.2%	
	\$100,001 - \$250,000	25	18.2%	\$4,705	8.6%	
	\$250,000 - \$1 Million	53	38.7%	\$27,687	50.4%	
	Over \$1 Million	6	4.4%	\$20,241	36.9%	
	<i>Total</i>	<i>137</i>	<i>100.0%</i>	<i>\$54,913</i>	<i>100.0%</i>	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	34	48.6%	\$1,539	6.7%	
	\$100,001 - \$250,000	13	18.6%	\$2,342	10.2%	
	\$250,000 - \$1 Million	21	30.0%	\$9,819	42.7%	
	Over \$1 Million	2	2.9%	\$9,300	40.4%	
	<i>Total</i>	<i>70</i>	<i>100.0%</i>	<i>\$23,000</i>	<i>100.0%</i>	

Originations & Purchases

Geographic Distribution of Business Loans

Assessment Area: Overall

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank		\$ (000s)		Demographics
	Count				Small Businesses
	#	%	\$	%	%
Low	12	8.8%	\$925	1.7%	3.0%
Moderate	16	11.7%	\$6,028	11.0%	10.2%
Middle	59	43.1%	\$25,830	47.0%	61.6%
Upper	50	36.5%	\$22,129	40.3%	25.1%
Unknown	0	0.0%	\$0	0.0%	0.1%
<i>Total</i>	<i>137</i>	<i>100.0%</i>	<i>\$54,913</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Geographic Distribution of Consumer Loans

Assessment Area: Overall

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank				Demographics
	Count		\$ (000s)		Households
	#	%	\$	%	%
Low	0	0.0%	\$0	0.0%	3.1%
Moderate	30	6.1%	\$488	3.7%	14.0%
Middle	327	66.7%	\$7,778	59.3%	64.2%
Upper	133	27.1%	\$4,855	37.0%	18.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>490</i>	<i>100.0%</i>	<i>\$13,121</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 & 2011				
	Bank				Demographics
	Count		\$ (000s)		Households by Household Income
	#	%	\$	%	%
Low	72	14.7%	1,038	7.9%	22.5%
Moderate	83	16.9%	1,461	11.1%	16.5%
Middle	100	20.4%	2,836	21.6%	19.2%
Upper	139	28.4%	5,286	40.3%	41.8%
Unknown	96	19.6%	2,500	19.1%	N/A
<i>Total</i>	<i>490</i>	<i>100.0%</i>	<i>13,121</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Geographic Distribution of Consumer Loans

Assessment Area: Youngstown-Warren-Boardman, Ohio MSA 49660

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank				Demographics
	Count		\$ (000s)		Households
	#	%	\$	%	%
Low	0	0.0%	\$0	0.0%	4.1%
Moderate	9	2.2%	\$273	2.4%	15.4%
Middle	264	65.2%	\$6,358	55.4%	59.2%
Upper	132	32.6%	\$4,842	42.2%	21.3%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>405</i>	<i>100.0%</i>	<i>\$11,473</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Geographic Distribution of Business Loans

Assessment Area: Youngstown-Warren-Boardman, Ohio MSA 49660

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank				Demographics
	Count		\$ (000s)		Small Businesses
	#	%	\$	%	%
Low	12	8.9%	\$925	1.7%	4.1%
Moderate	16	11.9%	\$6,028	11.1%	11.9%
Middle	57	42.2%	\$25,316	46.5%	53.9%
Upper	50	37.0%	\$22,129	40.7%	29.9%
Unknown	0	0.0%	\$0	0.0%	0.1%
<i>Total</i>	<i>135</i>	<i>100.0%</i>	<i>\$54,399</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Geographic Distribution of HMDA Loans

Assessment Area: Youngstown-Warren-Boardman, Ohio MSA 49660

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank				Demographics
		Count		\$ (000s)		Owner Occupied Units %
		#	%	\$	%	%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.7%
	Moderate	4	1.6%	\$72	0.4%	12.3%
	Middle	161	63.1%	\$10,450	55.1%	60.8%
	Upper	90	35.3%	\$8,433	44.5%	24.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>255</i>	<i>100.0%</i>	<i>\$18,955</i>	<i>100.0%</i>	<i>0.0%</i>
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.7%
	Moderate	3	4.9%	\$62	1.3%	12.3%
	Middle	35	57.4%	\$2,940	61.8%	60.8%
	Upper	23	37.7%	\$1,757	36.9%	24.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>61</i>	<i>100.0%</i>	<i>\$4,759</i>	<i>100.0%</i>	<i>0.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	12.3%
	Middle	66	56.9%	\$6,269	49.5%	60.8%
	Upper	50	43.1%	\$6,396	50.5%	24.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>116</i>	<i>100.0%</i>	<i>\$12,665</i>	<i>100.0%</i>	<i>0.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.7%
	Moderate	1	1.3%	\$10	0.7%	12.3%
	Middle	60	76.9%	\$1,241	81.1%	60.8%
	Upper	17	21.8%	\$280	18.3%	24.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>78</i>	<i>100.0%</i>	<i>\$1,531</i>	<i>100.0%</i>	<i>0.0%</i>

Originations & Purchases

Borrower Distribution of Consumer Loans

Assessment Area: Youngstown-Warren-Boardman, Ohio MSA 49660

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank				Demographics Households by Household Income %
	Count		\$ (000s)		
#	%	\$	%		
Low	53	13.1%	707	6.2%	22.9%
Moderate	64	15.8%	1,139	9.9%	16.4%
Middle	83	20.5%	2,480	21.6%	18.9%
Upper	126	31.1%	5,047	44.0%	41.8%
Unknown	79	19.5%	2,100	18.3%	N/A
<i>Total</i>	<i>405</i>	<i>100.0%</i>	<i>11,473</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Business Loans by Business Revenue & Loan Size

Assessment Area: Youngstown-Warren-Boardman, Ohio MSA 49660

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank				Total Businesses %
		Count		\$ (000s)		
#	%	\$	%			
BUSINESS REVENUE	\$1million or Less	69	51.1%	\$22,987	42.3%	88.2%
	Over \$1 Million	61	45.2%	\$28,021	51.5%	6.2%
	<i>Total where Rev is available</i>	<i>130</i>	<i>96.3%</i>	<i>\$51,008</i>	<i>93.8%</i>	<i>94.4%</i>
	Rev. Not Known	5	3.7%	\$3,392	6.2%	5.6%
	<i>Total</i>	<i>135</i>	<i>100.0%</i>	<i>\$54,399</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	52	38.5%	\$2,266	4.2%	
	\$100,001 - \$250,000	25	18.5%	\$4,705	8.6%	
	\$250,000 - \$1 Million	52	38.5%	\$27,187	50.0%	
	Over \$1 Million	6	4.4%	\$20,241	37.2%	
	<i>Total</i>	<i>135</i>	<i>100.0%</i>	<i>\$54,399</i>	<i>100.0%</i>	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	33	47.8%	\$1,526	6.6%	
	\$100,001 - \$250,000	13	18.8%	\$2,342	10.2%	
	\$250,000 - \$1 Million	21	30.4%	\$9,819	42.7%	
	Over \$1 Million	2	2.9%	\$9,300	40.5%	
	<i>Total</i>	<i>69</i>	<i>100.0%</i>	<i>\$22,987</i>	<i>100.0%</i>	

Originations & Purchases

Borrower Distribution of HMDA Loans

Assessment Area: Youngstown-Warren-Boardman, Ohio MSA 49660

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank		\$ (000s)		Demographics
		Count				Families by Family Income
		#	%	\$	%	%
HMDA TOTALS	Low	34	13.3%	\$1,035	5.5%	18.6%
	Moderate	57	22.4%	\$2,407	12.7%	18.3%
	Middle	72	28.2%	\$4,046	21.3%	22.2%
	Upper	87	34.1%	\$10,913	57.6%	40.9%
	Unknown	5	2.0%	\$554	2.9%	0.0%
	<i>Total</i>	255	100.0%	\$18,955	100.0%	100.0%
HOME PURCHASE	Low	12	19.7%	534	11.2%	18.6%
	Moderate	14	23.0%	787	16.5%	18.3%
	Middle	17	27.9%	1,138	23.9%	22.2%
	Upper	18	29.5%	2,300	48.3%	40.9%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	61	100.0%	4,759	100.0%	100.0%
REFINANCE	Low	7	6.0%	381	3.0%	18.6%
	Moderate	19	16.4%	1,271	10.0%	18.3%
	Middle	29	25.0%	2,463	19.4%	22.2%
	Upper	57	49.1%	8,007	63.2%	40.9%
	Unknown	4	3.4%	543	4.3%	0.0%
	<i>Total</i>	116	100.0%	12,665	100.0%	100.0%
HOME IMPROVEMENT	Low	15	19.2%	120	7.8%	18.6%
	Moderate	24	30.8%	349	22.8%	18.3%
	Middle	26	33.3%	445	29.1%	22.2%
	Upper	12	15.4%	606	39.6%	40.9%
	Unknown	1	1.3%	11	0.7%	0.0%
	<i>Total</i>	78	100.0%	1,531	100.0%	100.0%

Originations & Purchases

Borrower Distribution of HMDA Loans

Assessment Area: Cleveland-Elyria-Mentor, Ohio MSA 17460

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				
		2010 & 2011				Demographics Families by Family Income %
		Bank		\$ (000s)		
#	%	\$	%			
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	17.1%
	Moderate	2	50.0%	\$66	51.2%	21.4%
	Middle	1	25.0%	\$3	2.3%	24.7%
	Upper	1	25.0%	\$60	46.5%	36.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	4	100.0%	\$129	100.0%	100.0%
HOME PURCHASE	Low	0	0.0%	0	0.0%	17.1%
	Moderate	0	0.0%	0	0.0%	21.4%
	Middle	0	0.0%	0	0.0%	24.7%
	Upper	0	0.0%	0	0.0%	36.8%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	0	0.0%	0	0.0%	100.0%
REFINANCE	Low	0	0.0%	0	0.0%	17.1%
	Moderate	1	100.0%	36	100.0%	21.4%
	Middle	0	0.0%	0	0.0%	24.7%
	Upper	0	0.0%	0	0.0%	36.8%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	1	100.0%	36	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	17.1%
	Moderate	1	33.3%	30	32.3%	21.4%
	Middle	1	33.3%	3	3.2%	24.7%
	Upper	1	33.3%	60	64.5%	36.8%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	3	100.0%	93	100.0%	100.0%

Originations & Purchases

Geographic Distribution of HMDA Loans

Assessment Area: Cleveland-Elyria-Mentor, Ohio MSA 17460

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank				Demographics
		Count		\$ (000s)		Owner Occupied Units %
		#	%	\$	%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%
	Middle	4	100.0%	\$129	100.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$129</i>	<i>100.0%</i>	<i>0.0%</i>
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$36	100.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$36</i>	<i>100.0%</i>	<i>0.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%
	Middle	3	100.0%	\$93	100.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$93</i>	<i>100.0%</i>	<i>0.0%</i>

Originations & Purchases

Business Loans by Business Revenue & Loan Size

Assessment Area: Cleveland-Elyria-Mentor, Ohio MSA 17460

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank		\$ (000s)		Total Businesses
		Count				
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	0	0.0%	\$0	0.0%	88.7%
	Over \$1 Million	1	100.0%	\$500	100.0%	6.6%
	<i>Total where Rev is available</i>	<i>1</i>	<i>100.0%</i>	<i>\$500</i>	<i>100.0%</i>	<i>95.4%</i>
	Rev. Not Known	0	0.0%	\$0	0.0%	4.6%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$500</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	0	0.0%	\$0	0.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%	
	\$250,000 - \$1 Million	1	100.0%	\$500	100.0%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$500</i>	<i>100.0%</i>	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%	
	\$250,000 - \$1 Million	0	0.0%	\$0	0.0%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>0</i>	<i>100.0%</i>	<i>\$0</i>	<i>100.0%</i>	

Originations & Purchases

Geographic Distribution of Business Loans

Assessment Area: Cleveland-Elyria-Mentor, Ohio MSA 17460

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank		\$ (000s)		Demographics
	Count			Small Businesses	
	#	%	\$	%	%
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	0.0%
Middle	1	100.0%	\$500	100.0%	100.0%
Upper	0	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$500</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Geographic Distribution of Consumer Loans

Assessment Area: Cleveland-Elyria-Mentor, Ohio MSA 17460

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank				Demographics
	Count		\$ (000s)		Households
	#	%	\$	%	%
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	0.0%
Middle	11	100.0%	\$230	100.0%	100.0%
Upper	0	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$230</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Consumer Loans

Assessment Area: Cleveland-Elyria-Mentor, Ohio MSA 17460

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank				Demographics
	Count		\$ (000s)		Households by Household Income
	#	%	\$	%	%
Low	1	9.1%	11	4.7%	18.1%
Moderate	4	36.4%	109	47.4%	16.7%
Middle	1	9.1%	24	10.4%	20.7%
Upper	2	18.2%	30	13.0%	44.5%
Unknown	3	27.3%	56	24.5%	N/A
<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>230</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of HMDA Loans

Assessment Area: Ashtabula, Ohio Non MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank				Demographics
		Count		\$ (000s)		Families by Family Income %
		#	%	\$	%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.9%
	Moderate	1	16.7%	\$49	9.4%	18.5%
	Middle	1	16.7%	\$104	20.0%	24.9%
	Upper	4	66.7%	\$368	70.6%	35.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	6	100.0%	\$521	100.0%	100.0%
HOME PURCHASE	Low	0	0.0%	0	0.0%	20.9%
	Moderate	0	0.0%	0	0.0%	18.5%
	Middle	0	0.0%	0	0.0%	24.9%
	Upper	0	0.0%	0	0.0%	35.6%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	0	0.0%	0	0.0%	100.0%
REFINANCE	Low	0	0.0%	0	0.0%	20.9%
	Moderate	1	20.0%	49	10.1%	18.5%
	Middle	1	20.0%	104	21.5%	24.9%
	Upper	3	60.0%	330	68.3%	35.6%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	5	100.0%	483	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	20.9%
	Moderate	0	0.0%	0	0.0%	18.5%
	Middle	0	0.0%	0	0.0%	24.9%
	Upper	1	100.0%	38	100.0%	35.6%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	1	100.0%	38	100.0%	100.0%

Originations & Purchases

Geographic Distribution of HMDA Loans

Assessment Area: Ashtabula, Ohio Non MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank		Demographics		Owner Occupied Units %
		Count		\$ (000s)		
#	%	\$	%			
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%
	Middle	6	100.0%	\$521	100.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>\$521</i>	<i>100.0%</i>	<i>0.0%</i>
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%
	Middle	5	100.0%	\$483	100.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$483</i>	<i>100.0%</i>	<i>0.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$38	100.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$38</i>	<i>100.0%</i>	<i>0.0%</i>

Originations & Purchases

Business Loans by Business Revenue & Loan Size

Assessment Area: Ashtabula, Ohio Non MSA

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank				Total Businesses %
Count		\$ (000s)				
#	%	\$	%			
BUSINESS REVENUE	\$1million or Less	0	0.0%	\$0	0.0%	89.1%
	Over \$1 Million	0	0.0%	\$0	0.0%	3.0%
	<i>Total where Rev is available</i>	0	0.0%	\$0	0.0%	92.2%
	Rev. Not Known	0	0.0%	\$0	0.0%	7.8%
	<i>Total</i>	0	0.0%	\$0	0.0%	100.0%
LOAN SIZE	\$100,000 or Less	0	0.0%	\$0	0.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%	
	\$250,000 - \$1 Million	0	0.0%	\$0	0.0%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	0	0.0%	\$0	0.0%	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%	
	\$250,000 - \$1 Million	0	0.0%	\$0	0.0%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	0	100.0%	\$0	100.0%	

Originations & Purchases

Geographic Distribution of Business Loans

Assessment Area: Ashtabula, Ohio Non MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank				Demographics
Count		\$ (000s)		Small Businesses	
#	%	\$	%	%	
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	0.0%
Middle	0	0.0%	\$0	0.0%	100.0%
Upper	0	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	0	0.0%	\$0	0.0%	100.0%

Originations & Purchases

Geographic Distribution of Consumer Loans

Assessment Area: Ashtabula, Ohio Non MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank				Demographics
	Count		\$ (000s)		Households
	#	%	\$	%	%
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	0.0%
Middle	15	100.0%	\$188	100.0%	100.0%
Upper	0	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>\$188</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Consumer Loans

Assessment Area: Ashtabula, Ohio Non MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank				Demographics
	Count		\$ (000s)		Households by Household Income
	#	%	\$	%	%
Low	4	26.7%	24	12.7%	22.1%
Moderate	3	20.0%	8	4.4%	19.4%
Middle	3	20.0%	44	23.4%	17.7%
Upper	4	26.7%	104	55.3%	40.9%
Unknown	1	6.7%	8	4.2%	N/A
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>188</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of HMDA Loans

Assessment Area: Akron, Ohio MSA 10420

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank				Demographics
		Count		\$ (000s)		Families by Family Income
		#	%	\$	%	%
HMDA TOTALS	Low	4	9.8%	\$169	6.7%	17.5%
	Moderate	11	26.8%	\$542	21.5%	18.5%
	Middle	15	36.6%	\$948	37.6%	24.8%
	Upper	10	24.4%	\$844	33.5%	39.1%
	Unknown	1	2.4%	\$20	0.8%	0.0%
	<i>Total</i>	41	100.0%	\$2,523	100.0%	100.0%
HOME PURCHASE	Low	1	12.5%	68	12.3%	17.5%
	Moderate	3	37.5%	177	31.9%	18.5%
	Middle	2	25.0%	188	33.9%	24.8%
	Upper	2	25.0%	122	22.0%	39.1%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	8	100.0%	555	100.0%	100.0%
REFINANCE	Low	0	0.0%	0	0.0%	17.5%
	Moderate	2	18.2%	255	18.1%	18.5%
	Middle	5	45.5%	559	39.6%	24.8%
	Upper	4	36.4%	596	42.3%	39.1%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	11	100.0%	1,410	100.0%	100.0%
HOME IMPROVEMENT	Low	3	13.6%	101	18.1%	17.5%
	Moderate	6	27.3%	110	19.7%	18.5%
	Middle	8	36.4%	201	36.0%	24.8%
	Upper	4	18.2%	126	22.6%	39.1%
	Unknown	1	4.5%	20	3.6%	0.0%
	<i>Total</i>	22	100.0%	558	100.0%	100.0%

Originations & Purchases

Geographic Distribution of HMDA Loans

Assessment Area: Akron, Ohio MSA 10420

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank				Demographics
		Count		\$ (000s)		Owner Occupied Units %
		#	%	\$	%	%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	10	24.4%	\$261	10.3%	0.0%
	Middle	31	75.6%	\$2,262	89.7%	8.3%
	Upper	0	0.0%	\$0	0.0%	76.2%
	Unknown	0	0.0%	\$0	0.0%	15.5%
	<i>Total</i>	<i>41</i>	<i>100.0%</i>	<i>\$2,523</i>	<i>100.0%</i>	<i>0.0%</i>
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	3	37.5%	\$160	28.8%	0.0%
	Middle	5	62.5%	\$395	71.2%	8.3%
	Upper	0	0.0%	\$0	0.0%	76.2%
	Unknown	0	0.0%	\$0	0.0%	15.5%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$555</i>	<i>100.0%</i>	<i>0.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%
	Middle	11	100.0%	\$1,410	100.0%	8.3%
	Upper	0	0.0%	\$0	0.0%	76.2%
	Unknown	0	0.0%	\$0	0.0%	15.5%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$1,410</i>	<i>100.0%</i>	<i>0.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%
	Moderate	7	31.8%	\$101	18.1%	0.0%
	Middle	15	68.2%	\$457	81.9%	8.3%
	Upper	0	0.0%	\$0	0.0%	76.2%
	Unknown	0	0.0%	\$0	0.0%	15.5%
	<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>\$558</i>	<i>100.0%</i>	<i>0.0%</i>

Originations & Purchases

Business Loans by Business Revenue & Loan Size

Assessment Area: Akron, Ohio MSA 10420

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2010 & 2011				
		Bank		\$ (000s)		Total Businesses
		Count				
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	1	100.0%	\$14	100.0%	88.1%
	Over \$1 Million	0	0.0%	\$0	0.0%	6.4%
	<i>Total where Rev is available</i>	<i>1</i>	<i>100.0%</i>	<i>\$14</i>	<i>100.0%</i>	<i>94.4%</i>
	Rev. Not Known	0	0.0%	\$0	0.0%	5.6%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$14</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	1	100.0%	\$14	100.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%	
	\$250,000 - \$1 Million	0	0.0%	\$0	0.0%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$14</i>	<i>100.0%</i>	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	1	100.0%	\$14	100.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%	
	\$250,000 - \$1 Million	0	0.0%	\$0	0.0%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$14</i>	<i>100.0%</i>	

Originations & Purchases

Geographic Distribution of Business Loans

Assessment Area: Akron, Ohio MSA 10420

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank		\$ (000s)		Demographics
	Count				Small Businesses
	#	%	\$	%	%
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	7.4%
Middle	1	100.0%	\$14	100.0%	76.0%
Upper	0	0.0%	\$0	0.0%	16.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$14</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Geographic Distribution of Consumer Loans

Assessment Area: Akron, Ohio MSA 10420

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank				Demographics
	Count		\$ (000s)		Households
	#	%	\$	%	%
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	21	35.6%	\$215	17.5%	12.4%
Middle	37	62.7%	\$1,001	81.4%	74.6%
Upper	1	1.7%	\$13	1.1%	13.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>59</i>	<i>100.0%</i>	<i>\$1,230</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Consumer Loans

Assessment Area: Akron, Ohio MSA 10420

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2010 & 2011				
	Bank				Demographics
	Count		\$ (000s)		Households by Household Income
	#	%	\$	%	%
Low	14	23.7%	296	24.1%	21.4%
Moderate	12	20.3%	205	16.7%	17.0%
Middle	13	22.0%	289	23.5%	20.2%
Upper	7	11.9%	105	8.5%	41.4%
Unknown	13	22.0%	335	27.3%	N/A
<i>Total</i>	<i>59</i>	<i>100.0%</i>	<i>1,230</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

APPENDIX C

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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