

PUBLIC DISCLOSURE

June 17, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Croghan Colonial Bank
RSSD # 362717

323 Croghan Street
Fremont, Ohio 43420

Federal Reserve Bank of Cleveland

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING

This institution is rated: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

- The loan-to-deposit ratio is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and assessment area credit needs;
- A substantial majority of loans and other lending-related activities are in the assessment area;
- The geographic distribution of loans reflects a poor dispersion throughout the assessment areas;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income);
- The distribution of loans to businesses reflects a reasonable penetration among businesses of different sizes given the demographics of the assessment areas;
- There were no CRA-related complaints filed against the bank since the previous CRA examination; and,
- The community development performance demonstrates an adequate responsiveness to the community development needs of its assessment area.

The bank was rated "Satisfactory" at the previous CRA evaluation dated June 6, 2011.

SCOPE OF EXAMINATION

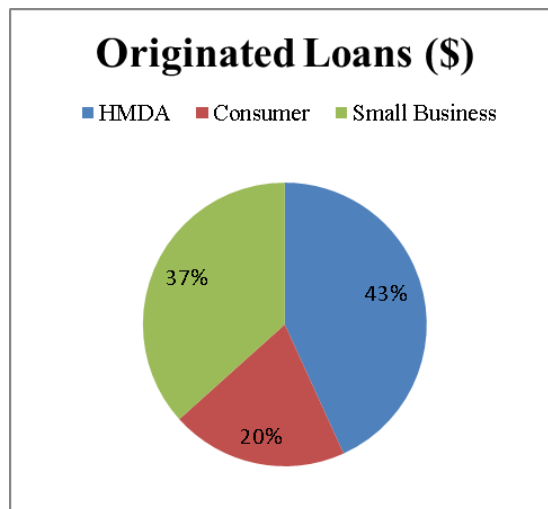
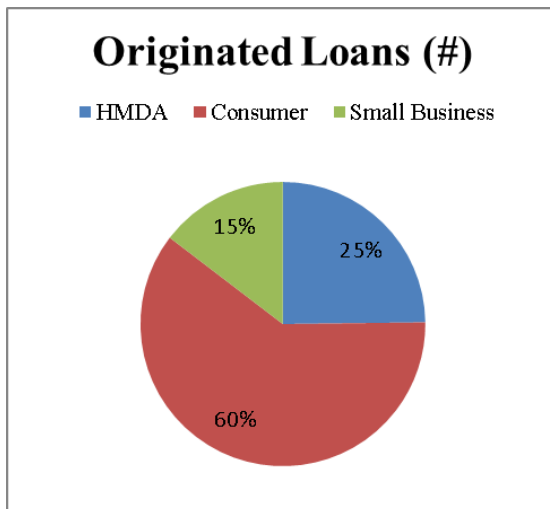
The Croghan Colonial Bank (Croghan) was evaluated using the standards for intermediate small banks.

Croghan’s lending performance was evaluated using loan data for the period of January 1, 2012 through December 31, 2012. The major products reviewed for this evaluation were residential real estate (residential), small business, and consumer loans. Residential loans are comprised of home purchase, home improvement, refinance, and multi-family loans (which are combined in this review) reported under the Home Mortgage Disclosure Act (HMDA). Small business loans are comprised of non-real estate and real estate-secured loans. Consumer loans are comprised of home equity, motor vehicle, other secured, and other non-secured consumer loans.

Community development activities for the period between June 7, 2011 and June 16, 2013 were also reviewed as part of this evaluation; specifically, community development loans, investments, and services occurring since the previous examination.

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)
HMDA Loans	289	27,710
Consumer Loans	727	12,973
Small Business Loans	174	22,564
Total	1,190	63,247



Given the above distribution, residential loans received the greatest weight. There were too few small farm loans in each individual assessment area for a meaningful analysis.

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

Lastly, five community contact interviews were conducted to provide additional information regarding some of the credit needs and opportunities throughout the bank's assessment area. Details from these interviews are presented in subsequent sections of this performance evaluation.

Croghan has two assessment areas throughout Ohio, including:

- Nonmetropolitan Ohio (Non-MSA Ohio), which includes:
 - Sandusky County
 - Seneca County
 - Portions of Erie County
 - Portions of Huron County
- Toledo, OH 45780 MSA (Toledo MSA), which includes:
 - Ottawa County
 - Wood County
 - Portions of Henry County

Croghan's assessment areas in Non-MSA Ohio was given the greatest weight in this evaluation, as it contained the largest percentage of branches and originated the largest amount of loans by volume. Croghan's main office is located in Fremont, Ohio and 12 of Croghan's 14 offices (86.0%) are located within this assessment area.

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

- Non-MSA Ohio – Full Review
- Toledo, OH 45780 MSA – Limited Review

DESCRIPTION OF INSTITUTION

Croghan is a full-service banking institution and is the sole banking subsidiary and the primary holding company asset of Croghan Bancshares, Inc., also located in Fremont, Ohio.

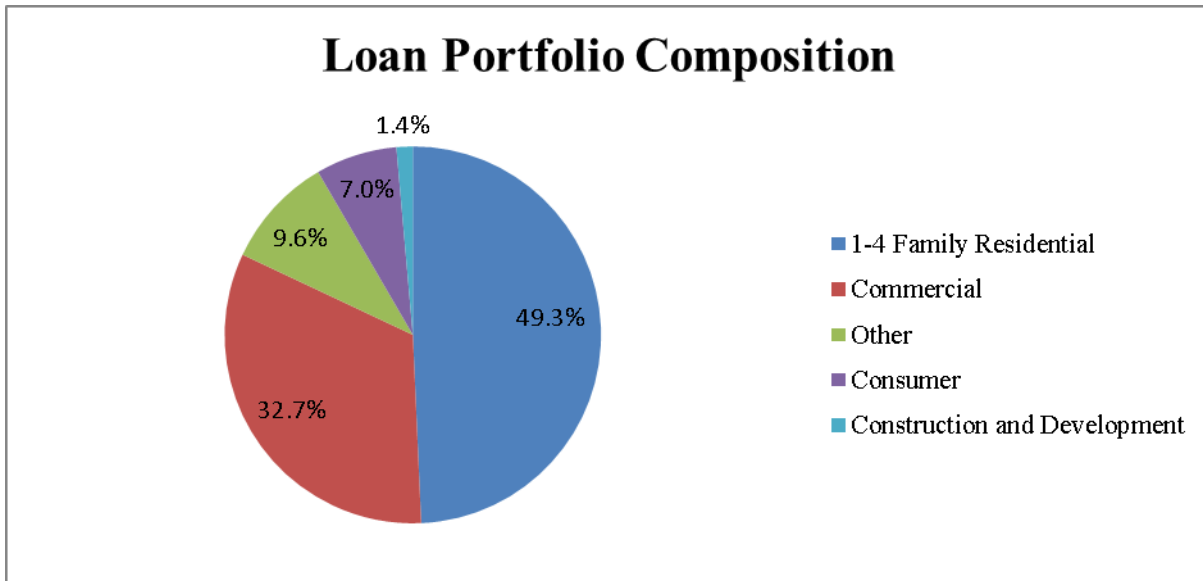
As of December 31, 2012, Croghan reported \$630 million in total assets, which is significantly higher than the previous examination date, when Croghan had total assets of approximately \$494.3 million. This increase in assets of 27.5% since the previous evaluation in June 2011 is primarily the result of an acquisition in December 2011, in which Croghan acquired four branches from Home Savings and Loan, three of which remain open and one merged with an existing Croghan branch located directly across the street from the acquired facility. As of June 2013, Croghan has 14 banking offices that include full service automated teller machines (ATMs). The main branch is located at 323 Croghan Street in Fremont, Ohio.

Since the previous evaluation, Croghan expanded its Non-MSA assessment area to include all of Seneca County as a result of the new branches. Croghan's assessment areas are in north central and northwestern Ohio and consist of the entireties of Sandusky, Seneca, Ottawa, and Wood Counties. It also includes portions of Erie, Huron, and Henry Counties. As stated above, Croghan's assessment area is comprised of two parts: a non-metropolitan area (Non-MSA Ohio) and a portion of the Toledo Metropolitan Statistical Area - 45780 (Toledo MSA). The Non-MSA Ohio assessment area consists of Sandusky and Seneca Counties, a portion of Huron County, and one tract in Erie County. Erie County is included in the Sandusky, Ohio MSA, but the institution has no banking offices in that area; therefore, for this CRA evaluation, it is included in the Non-MSA Ohio assessment area. The bank's Toledo MSA assessment area includes all of Ottawa and Wood Counties and three census tracts in Henry County. While Henry County is a non-metropolitan area, given the proximity of the three tracts to the Toledo MSA assessment area, it is included in the bank's Toledo MSA assessment area for this evaluation.

Croghan is a full-service retail bank offering business and consumer deposit accounts and commercial, residential mortgage, and consumer loans. As of December 31, 2012, Croghan had \$317 million in net loans and leases, which is approximately a \$30.7 million (10.7%) increase over the previous examination date. Loans comprised 51.0% of the bank's assets, consisting of primarily 1-4 family residential real estate loans by dollar volume. Securities made up the majority of the remaining assets at 37.8%.

The following chart represents the bank's loan portfolio as of December 31, 2012.

Loan Type	Percent of Total Loans
Secured by 1-4 Family Residential Real Estate (including Home Equity Loans)	49.3%
Commercial/Industrial & Non-Farm Non-Residential Real Estate	32.7%
Other Loans	9.6%
Consumer Loans	7.0%
Construction and Development	1.4%
Total (gross)	100.0%



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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Croghan’s overall performance under the Lending Test is rated “Satisfactory.” Lending performance in both assessment areas was considered reasonable.

Loan-to-Deposit Ratio

A financial institution’s loan-to-deposit ratio (LTD) compares the institution’s aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution’s lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing by the total number of quarters. The following table shows Croghan’s quarterly LTD ratios for the seven quarters since the previous evaluation. The table also includes Croghan’ aggregate peer group, which consists of all insured commercial banks having assets between \$300 million and \$1 billion, and three local peer banks from the Deposit Market Share Report.

Croghan Colonial Bank Loan-to-Deposit Ratios						
As of Date	Croghan	Peer Ratio¹	Old Ft Bkg Co²	Genoa Bkg Co³	Citizens Bkg Co⁴	Custom Peer
December 31, 2012	61.91	73.95	65.04	86.32	85.24	78.87
September 30, 2012	61.56	74.47	67.76	85.62	84.80	79.39
June 30, 2012	59.34	74.28	65.89	85.51	83.34	78.25
March 31, 2012	56.23	73.28	64.05	83.97	80.19	76.07
December 31, 2011	59.22	75.09	66.80	84.90	84.12	78.61
September 30, 2011	67.93	75.89	70.72	82.79	82.24	78.58
June 30, 2011	71.92	76.63	72.05	83.12	83.90	79.69
Average	62.59	74.80	67.47	84.60	83.40	78.49

1 Croghan’s national peer group consists of all insured commercial banks having assets between \$300 million and \$1 billion.

2 The Old Fort Banking Company, Tiffin, Ohio

3 Genoa Banking Company, Genoa, Ohio

4 Citizens Banking Company, Sandusky, Ohio

Croghan’s LTD ratio declined after the acquisition of four branches in December 2011, but its LTD ratio steadily increased throughout 2012. However, its average LTD ratio for the past seven quarters was 62.59%, while the custom peer group averaged a 78.49% LTD ratio during the same time period. Croghan’s average LTD ratio is lower than both the aggregate and custom peer groups, but it is still considered reasonable given the bank’s size, financial condition, and assessment area credit needs.

Assessment Area Concentration

Croghan’s residential, small business, and consumer lending was analyzed to determine the volume of lending inside and outside the bank’s assessment area. Of the bank’s total loans, 89.9% by volume and 79.8% by dollar amount were made inside the assessment area. The following table shows the distribution of loans made inside and outside the bank’s assessment area.

Lending Inside and Outside the Assessment Area										
Loan Type	Inside				Outside				Total	
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	\$(000s)
HMDA-related	289	92.3%	\$ 27,710	87.4%	24	7.7%	\$ 3,997	12.6%	313	\$ 31,707
Small Business	174	82.5%	\$ 22,564	70.4%	37	17.5%	\$ 9,498	29.6%	211	\$ 32,062
Consumer	727	91.0%	\$ 12,973	84.0%	72	9.0%	\$ 2,478	16.0%	799	\$ 15,451
TOTAL	1,190	89.9%	\$ 63,247	79.8%	133	10.1%	\$ 15,973	20.2%	1,323	\$ 79,220

A substantial majority of Croghan’s loans were made inside its assessment area.

Geographic Distribution of Lending

Croghan’s geographic distribution of lending is considered poor. The bank did not perform as well as the proxies for each of the loan categories (residential, small business and consumer). The respective analyses are included within each assessment area evaluation later in this report.

Borrower Distribution of Lending

Croghan’s lending to borrowers of different income levels and businesses of different revenue sizes are reasonable. The respective analyses are included within each assessment area discussion later in this report.

Response to Consumer Complaints

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

Community Development Test

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

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

Community Development Loans

Croghan originated no community development loans during this evaluation period.

Qualified Investments

Croghan made no qualified community development investments during this evaluation period, but made three qualified community development donations totaling \$16,000. Further, during previous CRA evaluation periods, Croghan made qualified investments that are still held as bank assets in the bank's investment portfolio. One of the investments was the purchase of municipal bonds to fund the construction of a new school that benefits a majority of low- and moderate-income students. The other investment was the purchase of a bond to renovate and provide housing to low-income tenants. The combined amount of both investments is approximately \$2.3 million.

Community Development Services

The bank has 14 branches throughout its market. Three (21.4%) are located in the moderate-income tracts, nine (64.3%) are located in middle-income tracts, and two (14.3%) are located in upper-income tracts. There are no branches located in low-income geographies, as there are no low-income tracts within the assessment area. Details of the bank's branching distribution are discussed within the respective assessment area sections within this performance evaluation.

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

Fair Lending or Other Illegal Credit Practices Review

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN OHIO

The Non-MSA Ohio assessment area consists of Sandusky and Seneca Counties, a portion of Huron County, and one tract in Erie County. Erie County is included in the Sandusky, Ohio MSA, but the institution has no banking offices in that area; therefore, for this CRA evaluation, it is included in the Non-MSA Ohio assessment area. The assessment area has a total of 37 census tracts, which is comprised of 5 moderate-income, 24 middle-income, and eight upper-income census tracts. There are no low-income tracts within this assessment area.

Twelve of the bank's fourteen banking centers are located in the Non-MSA Ohio assessment area. The bank's main office and seven branches are located in Sandusky County, while Seneca and Huron Counties have two branches each. There are no branches in Erie County.

None of the middle-income census tracts are listed on the Federal Financial Institutions Examinations Council's list of distressed nonmetropolitan middle-income geographies, as defined by the Community Development Financial Institutions for 2012.

Croghan had nearly 20.0% of the deposits as of June 30, 2012 and is ranked first out of 19 institutions in this market. The chart below illustrates the market share held by the top ten financial institutions in the Non-MSA assessment area:

#	Financial Institution	Deposit Market Share
1	The Croghan Colonial Bank	19.95%
2	The Old Fort Banking Company	11.45%
3	PNC Bank, N.A.	10.70%
4	Fifth Third Bank	10.11%
5	Sutton Bank	7.51%
6	Key Bank, N.A.	7.20%
7	The Citizens Banking Company	5.72%
8	The Home Savings and Loan Company of Youngstown, Ohio	5.40%
9	U.S. Bank, N.A.	4.04%
10	The Huntington National Bank	3.48%

Four community contacts were conducted in the Non-MSA Ohio assessment area to provide additional information regarding the credit needs of the local community and context to the demographic and economic characteristics discussed above. The first community contact was with an economic development agency committed to attracting and expanding business-related activities in Sandusky County.

According to the contact, Sandusky County is continuing to see economic improvement and there remains an increasing need for credit and financing in the county as businesses expand. The contact stated that local and regional banks provide flexible credit options and display a willingness to work with local businesses. It was also mentioned that Sandusky County is ranked second in the state in manufacturing vs. population and that while manufacturing and industry are both essential to the growth of the county, agriculture is also an important part of the community. Local banks ensure financing is available to farmers, agricultural businesses, and dealers.

The agency representative discussed local banks' participation in community events and specifically talked about an upcoming event to showcase current and future employment opportunities as well as the skills and education needed by graduates.

A second community contact was conducted to provide additional information regarding the assessment area. The contact provided insight into the economic development of Huron County, which has recently led Ohio for unemployment and continues to be a significant problem for the county. The local workforce has a lower-than-average college graduation rate and much of the local industry is based on construction, specifically road construction. There are many small employers in the county, but few major industrial employers.

The contact also stated that local businesses have had some difficulty in finding sources of funding due to some stricter lending standards at the banks. The contact specifically mentioned that there are only two community banks, Citizens and Croghan Colonial Bank, left in the county and they work well with local businesses. The community banks are very active in the community and participate on many boards and in many community organizations.

The southern part of the county is of special concern, where many migrant workers live.

A third community contact provides guidance for planning and development of land use, infrastructure, and economic growth for the benefit of Seneca County residents. The commission oversees grants and a revolving loan fund. The economic development program focuses on gap financing for local business development that will result in the creation and retention of permanent, private sector jobs principally for low- and moderate-income persons. The Commission also addresses fair housing and predatory lending issues and provides training to the community to educate Seneca County residents and business partners about specific laws impacting them. Attendees include local real estate agents, banks, board members, and residents.

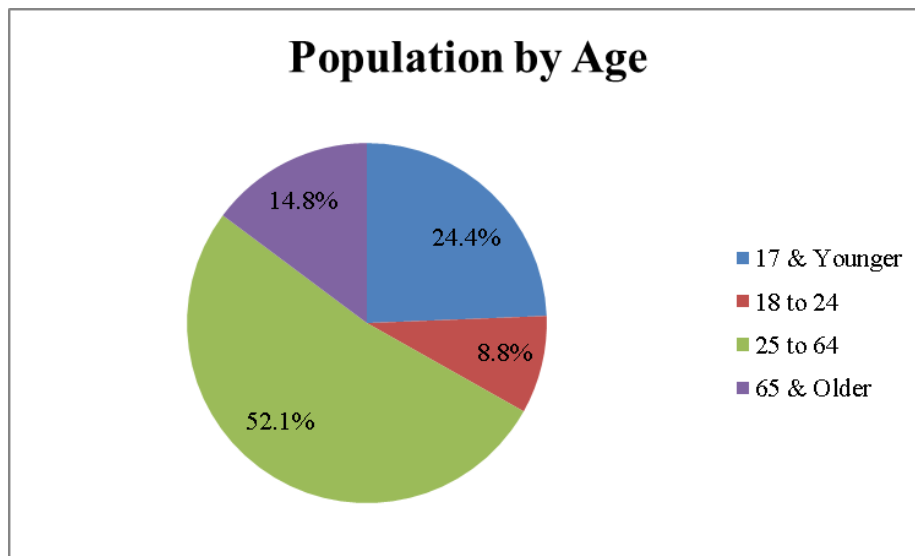
According to the contact, the overall demographic characteristics have remained the same for the last several years, but the population has decreased from 58,000 to 56,000 and is attributed to young adults leaving the area for opportunities not available in Seneca County. The contact also stated that the area within Tiffin, OH with the most need is located at 1st, 2nd, and 3rd Avenues, the former manufacturing site of American Standards. According to income surveys from the smaller communities and villages such as Republic, New Riegel, and Bloomville, income levels have remained steady over the five-year period covered by the survey.

The contact relayed that there is a good level of participation from local banks. Many realtor associations and banks participate in programs and more opportunities are anticipated in the near future. Local banks in particular are perceived to be more personable and not so corporate. The residents also tend to see the community bankers as more approachable because they are active in the community.

A fourth community contact represented an affordable housing agency. According to the contact, there continues to be a great need for low- and moderate-income housing in Erie County. The biggest challenge regarding banking is preparing program participants and applicants for homeownership. The agency offers a program that assists people in improving their credit scores and teaching them about budgeting and banking. The contact indicated that when the program participants complete the program, they generally do not have a problem obtaining funding from the local banks in the area. Local banks are involved in the community and help provide funding for affordable housing. The contact stated that community banks are very involved in the community, with representatives sitting on many boards and committees.

Population Characteristics

The 2010 U.S. Census report indicated that the population in the assessment area was 156,971, with individuals age 25 to 64 representing 52.1% of the population. Further, more than 75.0% of the population was 18 years of age or older, which is the legal age to enter into a contract. The following chart illustrates the population, by age, within the assessment area.



There are no low-income tracts in the Non-MSA Ohio assessment area and only 11.9% of the population lives in moderate-income tracts. White Non-Hispanics make up 89.6% of the assessment area's population, Black Non-Hispanics comprise 2.9% of the assessment area's population, and Hispanics comprise 6.2% of the assessment area's population. The total minority population for the Non-MSA Ohio assessment area is 10.4% versus the entire Nonmetropolitan Ohio total minority population of 6.1%.

According to the U.S. Census Bureau, the population from 2010 to 2012 has decreased in each of the four counties included in the assessment area as illustrated in the chart below:

County	2010 Population	2012 Population	Population % Change
Erie	77,079	76,398	-0.9%
Huron	59,626	59,280	-0.6%
Sandusky	60,944	60,510	0.7%
Seneca	56,745	56,018	-1.3%
Total	254,394	252,206	

Croghan’s main office is located in the city of Fremont, which is the county seat and the largest city in Sandusky County, according to county profile.⁵ In 2010, the city’s population was 16,734.

Income Characteristics

In 2010, the Non-MSA Ohio assessment area’s median family income was \$55,143, which was lower than Ohio’s median family income of \$59,680, but above Non-MSA Ohio’s median family income of \$52,111. The table below indicates the most recent median family income for Non-MSA Ohio.

Borrower Income Levels					
Ohio State Non-metro					
HUD Estimated Median Family Income	Low	Moderate	Middle	Upper	
	0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above	
2012	\$53,600	0 - \$26,799	\$26,800 - \$42,879	\$42,880 - \$64,319	\$64,320 - & above

In 2010, the Non-MSA Ohio assessment area contained 61,654 households, of which 43,084 (69.9%) were families. Of the total families in the assessment area, 16.4% were low-income, 18.4% were moderate-income, 22.5% were middle-income, 42.7% were upper-income, and 8.0% of the families were below the poverty level.

Housing Characteristics

According to 2010 U.S. Census data, there were 67,413 housing units in the assessment area. The majority (68.8%) of these units were owner-occupied, while 22.7% were rental units. Vacant units accounted for 8.5% of all housing units. One-to-four family housing units accounted for 94.0% of all housing units, while multi-family unit properties accounted for 6.0% of all housing units. Mobile homes represented 5.7% of all housing units in the assessment area. Further, 13.4% of all housing units were located in moderate-income tracts, of which 57.2% are owner-occupied. The owner-occupancy rates were much higher in upper-income (76.6%) and middle-income (68.5%) tracts. Collectively, the owner-occupancy rate for the entire assessment area was 68.8%, which is greater than Ohio’s rate of 61.7%.

⁵ <http://development.ohio.gov/files/research/C1073.pdf>

The median age of the housing stock in this assessment area was 54 years, with 41.0% of the stock built before 1950. The oldest housing stock was in moderate-income tracts (60 years), while the median age of the housing stock in middle- and upper-income tracts was slightly lower at 54 and 47 years, respectively. Older homes such as these are typically more likely to require repairs and rehabilitation.

The median housing value in this assessment area was \$115,255, with an affordability ratio of 40.1%. The higher the affordability ratio, the more affordable a home is considered. The housing affordability ratio is calculated by dividing the median family income by median housing value. The housing stock in the assessment area was greater than the affordability ratio for Ohio (34.7%) and slightly more affordable than the entire non-MSA (38.0%).

According to RealtyTrac,⁶ an online real estate marketplace and data company tracking foreclosure statistics among other data, Ohio had the nation's third highest overall foreclosure rate, with one in every 584 housing units receiving a foreclosure notice in June 2013. The smallest unit foreclosure data available is by county unit and the following table depicts the foreclosure filing rates for the four counties, in whole or in part, that make up the assessment area.

Geography Name	Ratio of Properties Receiving Foreclosure Filings in May 2013
Erie County, Ohio	1:622
Huron County, Ohio	1:399
Sandusky County, Ohio	1:398
Seneca County, Ohio	1:561
Ohio	1:584
United States	1:886

The median gross rent in the assessment area was \$577 as of 2010. The lowest rents (those less than \$350) only accounted for 9.9% of the units. Conversely, rental costs between \$500 and \$699 comprised the highest percentage of rental units at 34.3%, while an additional 28.2% had rental costs exceeding \$700. Rental units represent a larger percentage of total housing units in moderate-income tracts (30.8%) as compared to middle-income tracts (23.7%) and upper-income tracts (15.2%). These numbers indicate that demand for single-family home loans could be concentrated in middle- and upper-income tracts.

⁶ www.realtytrac.com

Labor, Employment, and Economic Characteristics

The following table illustrates the largest percentage of land use in each county in the assessment area according to county trends published by the Ohio Department of Development:⁷

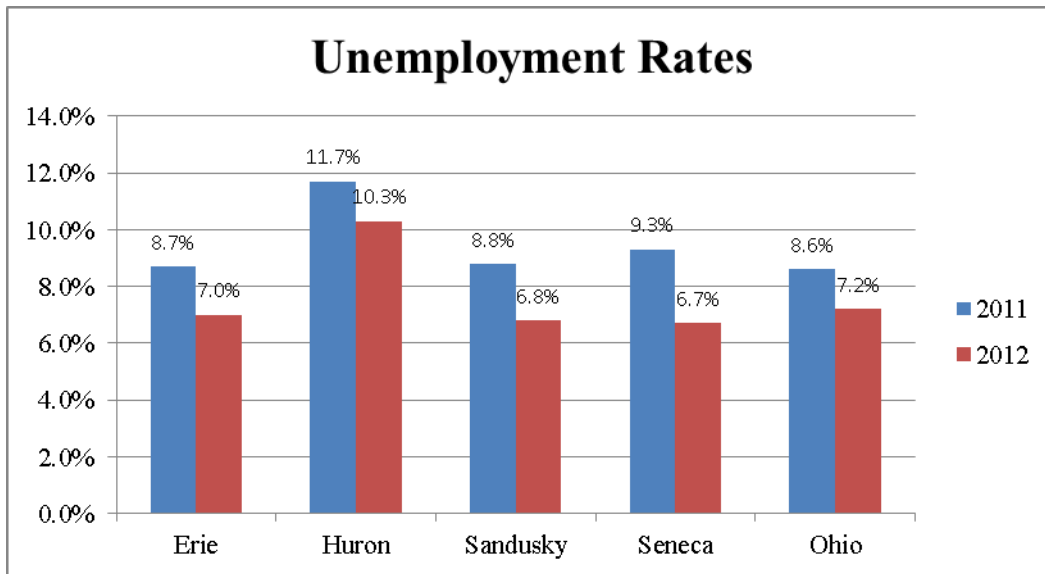
County	Urban	Cropland	Pasture	Forest	Open Water	Bare Mines	Wetlands
Erie	12.65%	53.38%	10.16%	16.17%	2.19%	4.77%	0.67%
Huron	3.85%	70.83%	8.09%	16.34%	0.75%	0.14%	0.00%
Sandusky	5.71%	71.64%	10.46%	6.55%	1.45%	3.77%	0.42%
Seneca	4.95%	79.44%	4.22%	10.22%	0.41%	0.39%	0.31%

The Ohio Department of Development identified that major employers in this assessment area include, but are not limited to the following:

County	Primary Employment Sectors	Major Employers
Erie County	Leisure and Hospitality; Trade, Transportation and Utilities; Educational and Health Services	Cedar Fair/Cedar Point; Erie County Government; Firelands Regional Medical Center; Ford Motor Co; Freudenberg NOK; International Automotive;Kalahari Resports; Sandusky City Schools; State of Ohio
Huron County	Manufacturing; Trade, Transportation And Utilities; Educaional and Health Services	Berry Plastics/Venture Packaging; Campbell Soup Co/Pepperidge Farm; EPIC Technologies; Fisher-Titus Medical Center; Huron County Government; Janesville Acoustics; MTD Products/Midwest Inds; Norwalk City Schools; RR Donnelley & Sons Co
Sandusky County	Manufacturing; Trade, Transportation And Utilities; Educaional and Health Services	Atlas Industries; Bellevue Hospital; Crown Battery; Eaton INOAC; Fremont City Schools; HJ Heinz Co; International Automotive Component; Memorial Hospital; Poly-Foam Int'l/Style Crest; Revere Plastics Inc; Sandusky County Government; Whirlpool Corp
Seneca County	Education and Health Services; Manufacturing; Trade, Transportation and Utilities	Dorel Industries/Ameriwood Ind; Fostoria City Schools; FRAM Group Operations LLC; Heidleberg College; Mercy Hospital of Tiffin; Roppe Corp;State of Ohio; Tiffin City Schools; Tiffin University

⁷ www.development.ohio.gov/reports_countytrends

The following table illustrates the unadjusted unemployment rates for 2011 and 2012 for the counties within the assessment area and the State of Ohio.



As shown above, county and state unemployment rates have declined since 2011.

Combined Demographics Report

Assessment Area(s): Non MSA Ohio

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	7,081	16.4	
Moderate-income	5	13.5	4,792	11.1	634	13.2	7,910	18.4	
Middle-income	24	64.9	27,628	64.1	2,297	8.3	9,697	22.5	
Upper-income	8	21.6	10,664	24.8	532	5.0	18,396	42.7	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	37	100.0	43,084	100.0	3,463	8.0	43,084	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	9,062	5,184	11.2	57.2	2,789	30.8	1,089	12.0	
Middle-income	43,018	29,452	63.5	68.5	10,159	23.6	3,407	7.9	
Upper-income	15,333	11,742	25.3	76.6	2,328	15.2	1,263	8.2	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	67,413	46,378	100.0	68.8	15,276	22.7	5,759	8.5	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	1,059	14.2	946	14.1	88	18.6	25	9.4	
Middle-income	4,515	60.6	4,029	60.1	306	64.7	180	67.4	
Upper-income	1,874	25.2	1,733	25.8	79	16.7	62	23.2	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	7,448	100.0	6,708	100.0	473	100.0	267	100.0	
Percentage of Total Businesses:				90.1		6.4		3.6	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	24	2.5	24	2.5	0	0.0	0	0.0	
Middle-income	587	61.2	581	61.0	6	100.0	0	0.0	
Upper-income	348	36.3	347	36.4	0	0.0	1	100.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	959	100.0	952	100.0	6	100.0	1	100.0	
Percentage of Total Farms:				99.3		.6		.1	

Based on 2012 D&B information according to 2010 ACS Boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN NON-METROPOLITAN OHIO

Lending Test

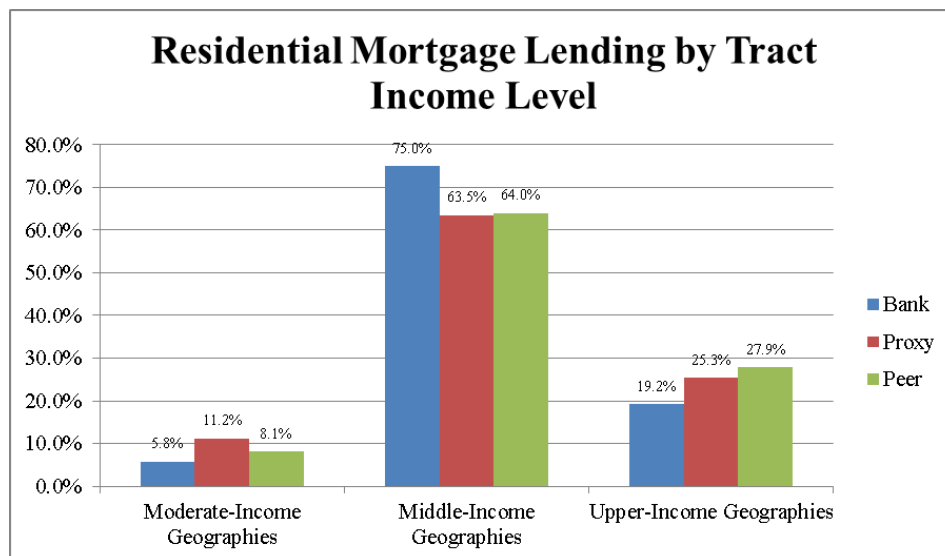
The bank's lending performance is considered reasonable.

Geographic Distribution

Geographic distribution in this assessment area received less weight than borrower distribution, since there were no low-income and only five (13.5%) moderate-income tracts in the assessment area. Overall, the distribution of loans among geographies is considered poor.

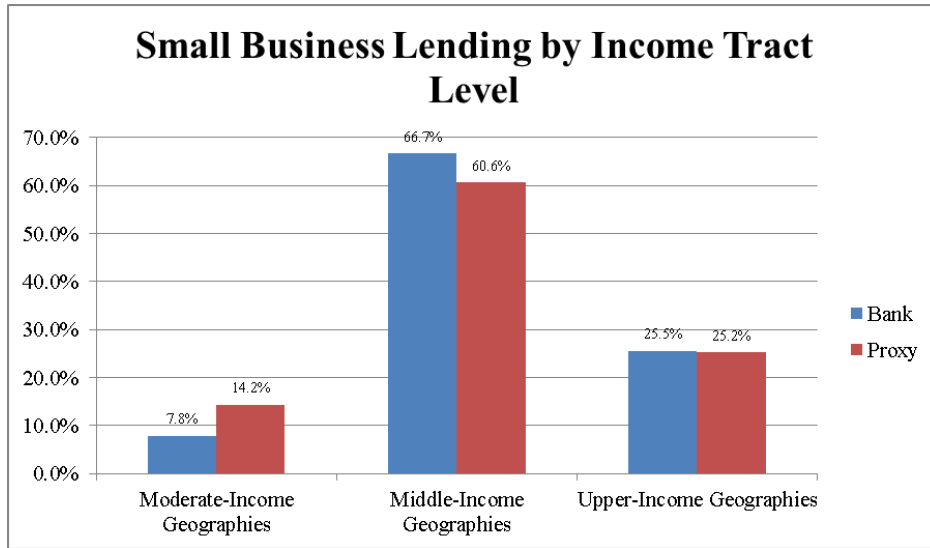
Residential Real Estate Loans

The bank's geographic distribution of residential loans reflects a poor dispersion of loans within the assessment area. Croghan's performance was compared to the number of owner-occupied housing units in the assessment area (proxy) and the aggregate of all residential lenders (peer) in this market that are HMDA reporters. As illustrated by the chart below, Croghan's performance in moderate-income geographies was below both the proxy's and the peer's performance.



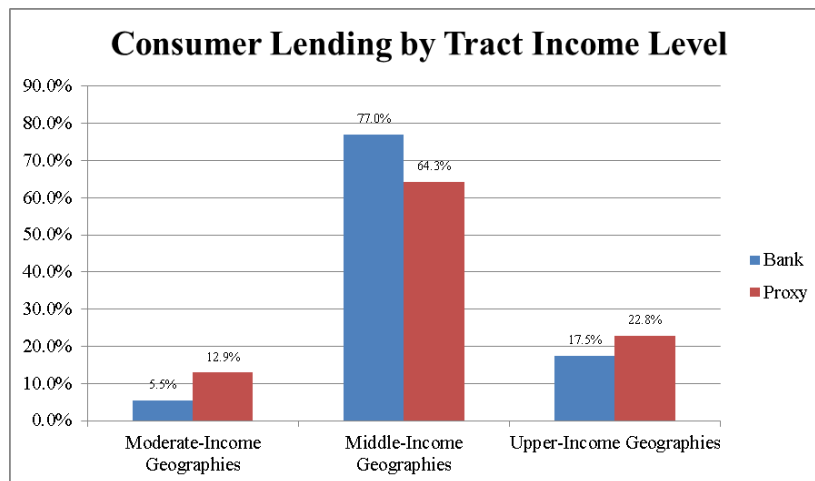
Small Business Loans

The geographic distribution of small business loans reflects a poor dispersion of loans compared to the actual number of small businesses (proxy). As shown in the chart below, the bank's performance was below the proxy in moderate-income tracts. Croghan exceeded the proxy's performance in middle-income tracts.



Consumer Loans

The geographic distribution of consumer loans originated by Croghan reflects a poor dispersion of loans within the assessment area. As shown in the chart below, the bank’s performance was below the number of households (proxy) in moderate-income geographies.

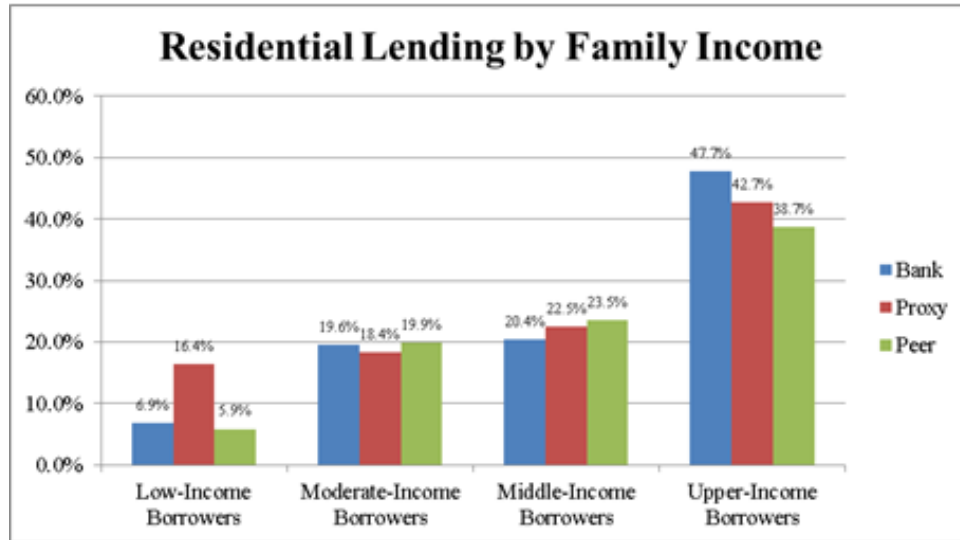


Distribution by Borrower Income and Revenue Size of the Business

Overall, the distribution of loans based on borrower’s income and for businesses of different revenue sizes is reasonable.

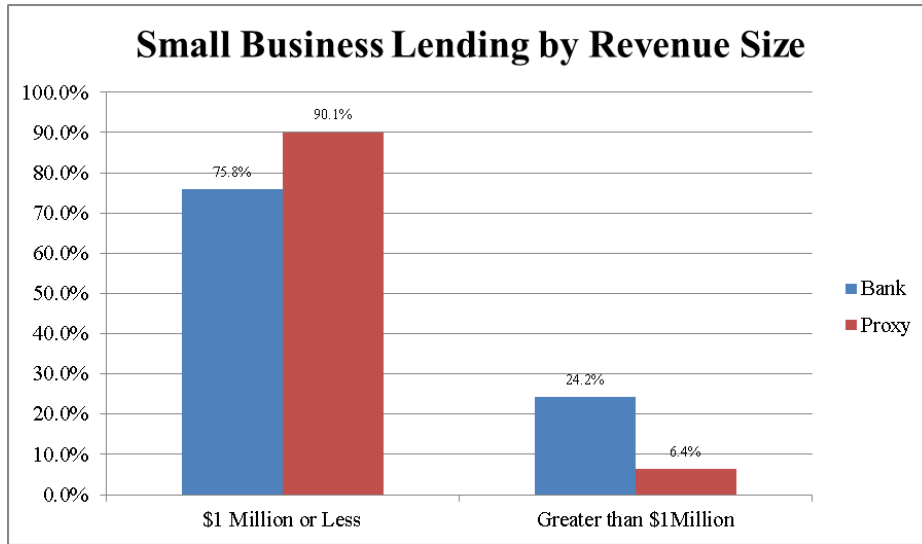
Residential Real Estate Loans

The distribution of residential loans to borrowers of different income levels is considered reasonable. Croghan’s residential lending performance was compared to the income levels of families in the assessment area (proxy) and the aggregate of all residential lenders (peer) in this market that are HMDA reporters. As illustrated in the chart below, Croghan’s lending to low-income families was slightly higher than the peer, but less than the proxy. While lending to moderate-income families was comparable to the peer and slightly higher than the proxy.

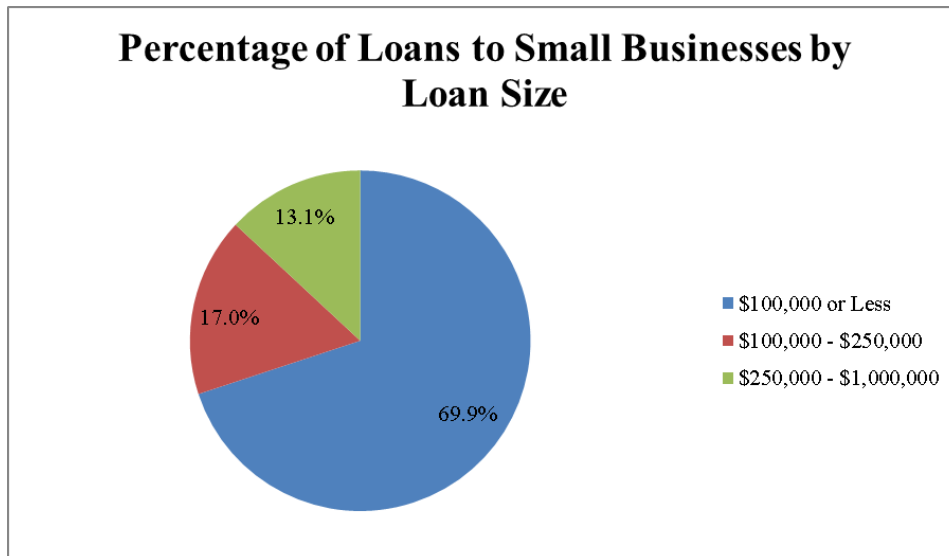


Small Business Loans

Croghan’s lending to businesses with revenues of \$1 million or less is considered reasonable. The bank originated 75.8% of its small business loans to businesses with revenues of \$1 million or less, compared to 90.1% of these businesses within the assessment area (proxy) as illustrated below.

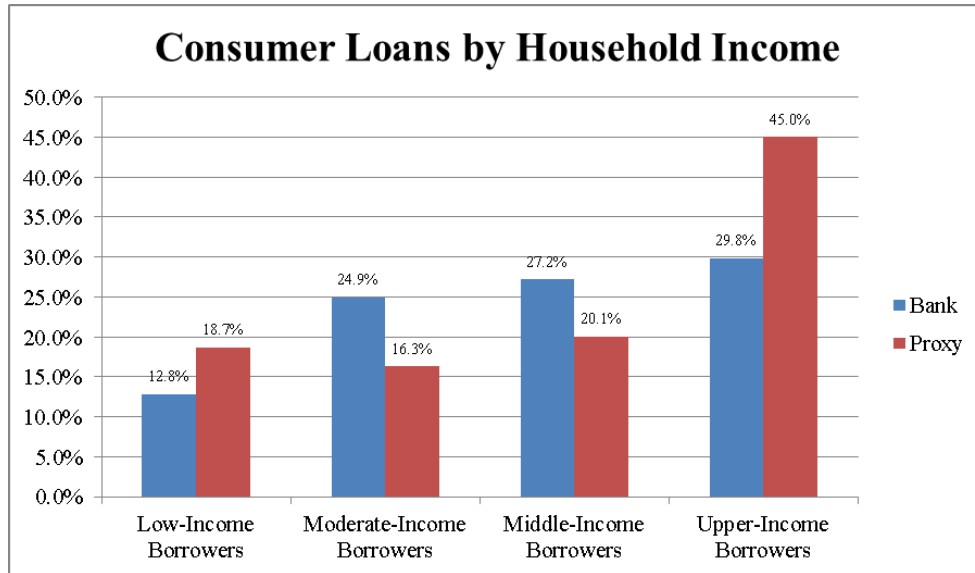


As the following graph indicates, 69.9% of Croghan’s business loans were for \$100,000 or less. Typically, the extent to which a bank is willing to extend loans in amounts of \$100,000 or less is reviewed because smaller businesses often have a greater need for small-dollar loans. Overall, this demonstrates a reasonable responsiveness to meeting the credit needs of small businesses in this area.



Consumer Loans

Croghan’s consumer lending performance was compared to the income levels of households in the assessment area (proxy). As illustrated in the chart below, Croghan’s lending to low-income borrowers was less than the proxy, but its lending to moderate-income borrowers was greater than the proxy.



Community Development Test

The bank’s community development performance demonstrates an adequate responsiveness to the community development needs of its assessment area.

Community Development Loans

Croghan originated no community development loans during this evaluation period.

Qualified Investments

Croghan made no qualified community development investments during this evaluation period, but made three qualified community development donations totaling \$16,000 to organizations operating within the assessment area. Further, during previous CRA evaluation periods, Croghan made a qualified investment with the purchase of municipal bonds to fund the construction of a new school benefiting a majority of low- and moderate-income students within the assessment area. Because this investment of approximately \$1.7 million is still held in the bank’s investment portfolio, it was given consideration during the current evaluation period.

Community Development Services

Twelve of Croghan’s fourteen banking centers are located in this assessment area. Three (25.0%) are located in the moderate-income tracts, seven (58.3%) are located in middle-income tracts, and two (16.7%) are located in upper-income tracts. Since there are no low-income tracts within the delineated assessment area, there are no branches located in low-income geographies. Branch hours and services are comparable throughout the branch system and services are also available through online and telephone banking.

Croghan officers and employees provide their financial expertise to local organizations that provide community development, economic development, and affordable housing services to the community through board and committee memberships. Below is a list of organizations and services provided in this assessment area.

Bellevue Development Corporation	Board Member, Revolving Loan Fund	Organization's purpose is to promote industrial and business development in Bellevue, Ohio.
City of Fremont – Revolving Loan Fund	Board Member, Loan Review	Loans primarily to start-ups that assist in creating new jobs in the area.
Habitat for Humanity – Firelands	Finance Committee Chairperson	Builds housing for low-income residents.
Sandusky County Economic Development Corporation	Board Member, Treasurer	Economic retention/expansion.
Small Business Basics Seminars	Service	Seminars promote economic development through small business. Seminars were held throughout the assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TOLEDO, OHIO MSA 45780

The Toledo MSA assessment area includes all of Ottawa and Wood Counties and three census tracts in Henry County. While Henry County is a non-metropolitan area, given the proximity of the three tracts to the Toledo MSA assessment area, it is included in the bank's Toledo MSA assessment area for the purposes of this evaluation. The assessment area has a total of 44 census tracts, which is comprised of two moderate-income, 25 middle-income, and 16 upper-income census tracts. The income level of one tract is unknown and there are no low-income tracts within this assessment area.

Only two of the bank's fourteen banking centers are located in the Toledo MSA assessment area. One of the branches is located in Ottawa County and the other is in Wood County. There are no branches in Henry County.

According to the FDIC Deposit Market Share Report, Croghan had 1.8% of the deposits in this assessment area as of June 30, 2012, which ranked the bank 12th of 20 institutions. The Huntington National Bank had the highest market share with 34.9% of the deposits. Fifth Third Bank and Key Bank N.A. had the second and third largest shares with 13.4% and 7.9%, respectively.

Between January 1, 2012 and December 31, 2012, Croghan originated 29 residential real estate loans, 21 small business loans, and 92 consumer loans, which represent 10.0%, 12.1% and 12.7%, respectively, of total loans originated during this evaluation period. Overall, lending in this assessment area accounted for 13.5% of Croghan's total lending.

One community contact within this assessment area was interviewed to provide additional insight regarding the credit and housing needs of the local community and additional information on the current economic situation in the area. The contact was a representative of a non-profit housing organization operating in Ottawa County that provides affordable housing to residents in the community, particularly mentally handicapped and low- and moderate-income individuals. The contact stated Ottawa County was affected significantly by the economic downturn. The economy in eastern Ottawa County is primarily driven by tourism and the economy is more seasonal. In contrast, western Ottawa County has a much more stable economy and employment level. Most of the jobs held by low- and moderate-income individuals are located in eastern Ottawa County. Historically, unemployment rates in Ottawa County have been high, but have been declining steadily over the past few years. New business development is slow and most of the employment opportunities have been seasonal rather than permanent and do not pay well. The contact mentioned that property taxes in Ottawa County are fairly high, which makes it difficult for many people to afford a home and housing stock in Ottawa County is relatively old. There is a significant need for affordable rental housing in the area.

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

Combined Demographics Report

Assessment Area(s): Toledo 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	7,022	15.1	
Moderate-income	2	4.5	1,356	2.9	295	21.8	7,256	15.6	
Middle-income	25	56.8	25,953	55.6	2,145	8.3	9,975	21.4	
Upper-income	16	36.4	19,336	41.4	637	3.3	22,401	48.0	
Unknown-income	1	2.3	9	0.0	9	100.0	0	0.0	
Total Assessment Area	44	100.0	46,654	100.0	3,086	6.6	46,654	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	5,313	667	1.3	12.6	4,214	79.3	432	8.1	
Middle-income	47,779	29,675	57.0	62.1	8,897	18.6	9,207	19.3	
Upper-income	32,077	21,761	41.8	67.8	5,539	17.3	4,777	14.9	
Unknown-income	129	0	0.0	0.0	110	85.3	19	14.7	
Total Assessment Area	85,298	52,103	100.0	61.1	18,760	22.0	14,435	16.9	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	301	3.4	247	3.1	30	5.4	24	5.4	
Middle-income	4,846	54.3	4,253	53.6	313	56.7	280	62.8	
Upper-income	3,761	42.1	3,414	43.0	207	37.5	140	31.4	
Unknown-income	24	0.3	20	0.3	2	0.4	2	0.4	
Total Assessment Area	8,932	100.0	7,934	100.0	552	100.0	446	100.0	
Percentage of Total Businesses:			88.8		6.2		5.0		
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	1	0.1	1	0.1	0	0.0	0	0.0	
Middle-income	538	69.1	534	69.1	4	66.7	0	0.0	
Upper-income	240	30.8	238	30.8	2	33.3	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	779	100.0	773	100.0	6	100.0	0	.0	
Percentage of Total Farms:			99.2		.8		.0		

Based on 2012 D&B information according to 2010 ACS Boundaries.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
TOLEDO OHIO MSA #45780**

Lending Test

The bank's lending performance in this assessment area was consistent with its performance in the Non-MSA Ohio assessment area.

Community Development Test

The bank did not make any community development loans or qualified investments in the Toledo MSA during the review period. However, during previous CRA evaluation periods, Croghan made a qualified investment with the purchase of a bond to renovate and provide housing to low-income tenants. Because this investment of approximately \$652,000 is still held in the bank's investment portfolio, it was given consideration during the current evaluation period. Croghan also funds various small business basics seminars throughout the assessment area.

APPENDIX A
LENDING TABLES

HMDA Loan Distribution Table

Exam: Croghan Colonial

Assessment Area/Group : Toledo MSA

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	25.0%	44	8.4%
Low/Moderate Total	0	0.0%	0	0.0%	1	25.0%	44	8.4%
Middle	2	50.0%	219	41.8%	1	25.0%	175	33.4%
Upper	2	50.0%	305	58.2%	2	50.0%	305	58.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	524	100.0%	4	100.0%	524	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	3	13.0%	321	8.6%
Low/Moderate Total	0	0.0%	0	0.0%	3	13.0%	321	8.6%
Middle	13	56.5%	1,881	30.7%	1	4.3%	64	1.7%
Upper	10	43.5%	1,830	49.3%	17	73.9%	2,996	80.7%
Unknown	0	0.0%	0	0.0%	2	8.7%	330	8.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	3,711	100.0%	23	100.0%	3,711	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	2	100.0%	11	100.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	2	100.0%	11	100.0%
Middle	2	100.0%	11	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	11	100.0%	2	100.0%	11	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	2	6.9%	11	0.3%
Moderate	0	0.0%	0	0.0%	4	13.8%	365	8.6%
Low/Moderate Total	0	0.0%	0	0.0%	6	20.7%	376	8.9%
Middle	17	58.6%	2,111	49.7%	2	6.9%	239	5.6%
Upper	12	41.4%	2,135	30.3%	19	65.5%	3,301	77.7%
Unknown	0	0.0%	0	0.0%	2	6.9%	330	7.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	29	100.0%	4,246	100.0%	29	100.0%	4,246	100.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: Croghan Colonial

Assessment Area/Group :Non MSA Ohio

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	8	13.1%	398	7.0%
Moderate	4	6.6%	325	5.8%	15	24.6%	1,072	19.0%
Low/Moderate Total	4	6.6%	325	5.8%	23	37.7%	1,470	26.0%
Middle	46	75.4%	4,112	72.8%	13	21.3%	734	13.0%
Upper	11	18.0%	1,213	21.5%	23	37.7%	3,321	58.8%
Unknown	0	0.0%	0	0.0%	2	3.3%	125	2.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	61	100.0%	5,650	100.0%	61	100.0%	5,650	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	7	4.3%	432	2.5%
Moderate	8	4.9%	458	2.7%	27	16.5%	1,758	10.3%
Low/Moderate Total	8	4.9%	458	2.7%	34	20.7%	2,190	12.9%
Middle	120	73.2%	12,296	72.2%	31	18.9%	2,536	14.9%
Upper	36	22.0%	4,280	25.1%	87	53.0%	11,239	66.0%
Unknown	0	0.0%	0	0.0%	12	7.3%	1,069	6.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	164	100.0%	17,034	100.0%	164	100.0%	17,034	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	3	8.6%	8	1.0%
Moderate	3	8.6%	18	2.3%	9	25.7%	43	5.5%
Low/Moderate Total	3	8.6%	18	2.3%	12	34.3%	51	6.5%
Middle	29	82.9%	658	84.4%	9	25.7%	152	19.5%
Upper	3	8.6%	104	13.3%	14	40.0%	577	74.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	35	100.0%	780	100.0%	35	100.0%	780	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	18	6.9%	838	3.6%
Moderate	15	5.8%	801	3.4%	51	19.6%	2,873	12.2%
Low/Moderate Total	15	5.8%	801	3.4%	69	26.5%	3,711	15.8%
Middle	195	75.0%	17,066	72.7%	53	20.4%	3,422	14.6%
Upper	50	19.2%	5,597	23.9%	124	47.7%	15,137	64.5%
Unknown	0	0.0%	0	0.0%	14	5.4%	1,194	5.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	260	100.0%	23,464	100.0%	260	100.0%	23,464	100.0%

*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Croghan Colonial

Assessment Area/Group: Toledo MSA

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income												
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	13	76.5%	2,068	83.7%	0	0.0%	0	0.0%	2	50.0%	87	47.0%
Upper	4	23.5%	402	16.3%	0	0.0%	0	0.0%	2	50.0%	98	53.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	2,470	100.0%	0	0.0%	0	0.0%	4	100.0%	185	100.0%
By Revenue												
Total \$1 Million or Less	17	100.0%	2,470	100.0%	0	0.0%	0	0.0%	4	100.0%	185	100.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	2,470	100.0%	0	0.0%	0	0.0%	4	100.0%	185	100.0%
By Loan Size												
\$100,000 or less	8	47.1%	483	19.6%	0	0.0%	0	0.0%	4	100.0%	185	100.0%
\$100,001 - \$250,000	7	41.2%	980	39.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	11.8%	1,007	40.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	2,470	100.0%	0	0.0%	0	0.0%	4	100.0%	185	100.0%
By Loan Size and Revenue \$1 Million or Less												
\$100,000 or less	8	47.1%	483	19.6%	0	0.0%	0	0.0%	4	100.0%	185	100.0%
\$100,001 - \$250,000	7	41.2%	980	39.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	11.8%	1,007	40.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	2,470	100.0%	0	0.0%	0	0.0%	4	100.0%	185	100.0%

*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Croghan Colonial

Assessment Area/Group: Non MSA Ohio

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income												
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	3.6%	167	1.4%	0	0.0%	0	0.0%	10	10.2%	413	5.2%
Low/Moderate Total	2	3.6%	167	1.4%	0	0.0%	0	0.0%	10	10.2%	413	5.2%
Middle	30	54.5%	3,443	45.6%	0	0.0%	0	0.0%	72	73.5%	5,014	63.0%
Upper	23	41.8%	6,334	53.0%	0	0.0%	0	0.0%	16	16.3%	2,538	31.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	55	100.0%	11,944	100.0%	0	0.0%	0	0.0%	98	100.0%	7,965	100.0%
By Revenue												
Total \$1 Million or Less	49	89.1%	9,675	81.0%	0	0.0%	0	0.0%	67	68.4%	2,521	31.7%
Over \$1 Million	6	10.9%	2,269	19.0%	0	0.0%	0	0.0%	31	31.6%	5,444	68.3%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	55	100.0%	11,944	100.0%	0	0.0%	0	0.0%	98	100.0%	7,965	100.0%
By Loan Size												
\$100,000 or less	22	40.0%	1,019	8.5%	0	0.0%	0	0.0%	85	86.7%	2,860	35.9%
\$100,001 - \$250,000	19	34.5%	2,813	23.6%	0	0.0%	0	0.0%	7	7.1%	1,070	13.4%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	14	25.5%	8,112	67.9%	0	0.0%	0	0.0%	6	6.1%	4,035	50.7%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	55	100.0%	11,944	100.0%	0	0.0%	0	0.0%	98	100.0%	7,965	100.0%
By Loan Size and Revenue \$1 Million or Less												
\$100,000 or less	19	38.8%	878	9.1%	0	0.0%	0	0.0%	65	94.0%	1,864	73.9%
\$100,001 - \$250,000	18	36.7%	2,613	27.0%	0	0.0%	0	0.0%	4	6.0%	657	26.1%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	12	24.5%	6,184	63.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	49	100.0%	9,675	100.0%	0	0.0%	0	0.0%	67	100.0%	2,521	100.0%

*Information based on 2010 ACS data

Consumer Loan Distribution Table

Exam: Croghan Colonial

Assessment Area/Group : Toledo MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	5	35.7%	168	18.9%
Low/Moderate Total	0	0.0%	0	0.0%	5	35.7%	168	18.9%
Middle	12	85.7%	751	84.3%	2	14.3%	135	15.2%
Upper	2	14.3%	140	15.7%	7	50.0%	588	66.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	891	100.0%	14	100.0%	891	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	6	24.0%	44	12.8%
Moderate	1	4.0%	9	2.6%	4	16.0%	59	17.2%
Low/Moderate Total	1	4.0%	9	2.6%	10	40.0%	103	29.9%
Middle	16	64.0%	226	65.7%	7	28.0%	106	30.8%
Upper	8	32.0%	109	31.7%	6	24.0%	106	30.8%
Unknown	0	0.0%	0	0.0%	2	8.0%	29	8.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	344	100.0%	25	100.0%	344	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	11	26.2%	78	10.5%
Moderate	0	0.0%	0	0.0%	7	16.7%	108	14.6%
Low/Moderate Total	0	0.0%	0	0.0%	18	42.9%	186	25.1%
Middle	33	78.6%	501	67.5%	5	11.9%	130	17.5%
Upper	9	21.4%	241	32.5%	18	42.9%	420	56.6%
Unknown	0	0.0%	0	0.0%	1	2.4%	6	0.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	42	100.0%	742	100.0%	42	100.0%	742	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	7	63.6%	19	43.2%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	7	63.6%	19	43.2%
Middle	10	90.9%	41	93.2%	2	18.2%	8	18.2%
Upper	1	9.1%	3	6.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	18.2%	17	38.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	44	100.0%	11	100.0%	44	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	24	26.1%	141	7.0%
Moderate	1	1.1%	9	0.4%	16	17.4%	335	16.6%
Low/Moderate Total	1	1.1%	9	0.4%	40	43.5%	476	23.6%
Middle	71	77.2%	1,519	75.2%	16	17.4%	379	18.8%
Upper	20	21.7%	493	24.4%	31	33.7%	1,114	55.1%
Unknown	0	0.0%	0	0.0%	5	5.4%	52	2.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	92	100.0%	2,021	100.0%	92	100.0%	2,021	100.0%

Consumer Loan Distribution Table

Exam: Croghan Colonial

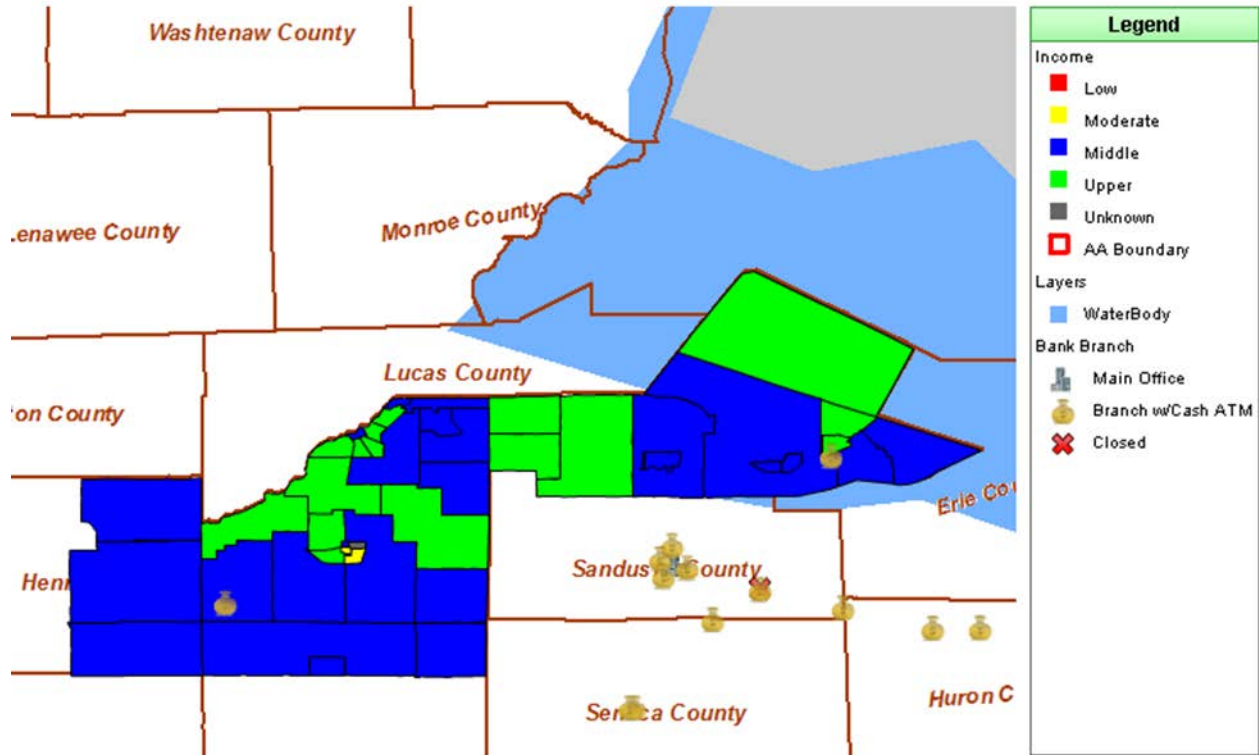
Assessment Area/Group :Non MSA Ohio

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	12	9.0%	295	5.5%
Moderate	7	5.3%	118	2.2%	27	20.3%	659	12.3%
Low/Moderate Total	7	5.3%	118	2.2%	39	29.3%	954	17.8%
Middle	105	78.9%	4,330	80.9%	34	25.6%	1,466	27.4%
Upper	21	15.8%	906	16.9%	48	36.1%	2,467	46.1%
Unknown	0	0.0%	0	0.0%	12	9.0%	467	8.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	133	100.0%	5,354	100.0%	133	100.0%	5,354	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	21	11.0%	199	8.7%
Moderate	10	5.2%	78	3.4%	49	25.7%	501	22.0%
Low/Moderate Total	10	5.2%	78	3.4%	70	36.6%	700	30.7%
Middle	153	80.1%	1,815	79.7%	53	27.7%	623	27.4%
Upper	28	14.7%	384	16.9%	59	30.9%	799	35.1%
Unknown	0	0.0%	0	0.0%	9	4.7%	155	6.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	191	100.0%	2,277	100.0%	191	100.0%	2,277	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	29	12.4%	199	6.7%
Moderate	15	6.4%	195	6.5%	59	25.3%	533	17.9%
Low/Moderate Total	15	6.4%	195	6.5%	88	37.8%	732	24.6%
Middle	171	73.4%	2,239	75.1%	67	28.8%	874	29.3%
Upper	47	20.2%	547	18.3%	71	30.5%	1,287	43.2%
Unknown	0	0.0%	0	0.0%	7	3.0%	88	3.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	233	100.0%	2,981	100.0%	233	100.0%	2,981	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	19	24.4%	57	16.8%
Moderate	3	3.8%	10	2.9%	23	29.5%	49	14.4%
Low/Moderate Total	3	3.8%	10	2.9%	42	53.8%	106	31.2%
Middle	60	76.9%	280	82.4%	19	24.4%	51	15.0%
Upper	15	19.2%	50	14.7%	11	14.1%	139	40.9%
Unknown	0	0.0%	0	0.0%	6	7.7%	44	12.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	340	100.0%	78	100.0%	340	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	81	12.8%	750	6.8%
Moderate	35	5.5%	401	3.7%	158	24.9%	1,742	15.9%
Low/Moderate Total	35	5.5%	401	3.7%	239	37.6%	2,492	22.8%
Middle	489	77.0%	8,664	79.1%	173	27.2%	3,014	27.5%
Upper	111	17.5%	1,887	17.2%	189	29.8%	4,692	42.8%
Unknown	0	0.0%	0	0.0%	34	5.4%	754	6.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	635	100.0%	10,952	100.0%	635	100.0%	10,952	100.0%

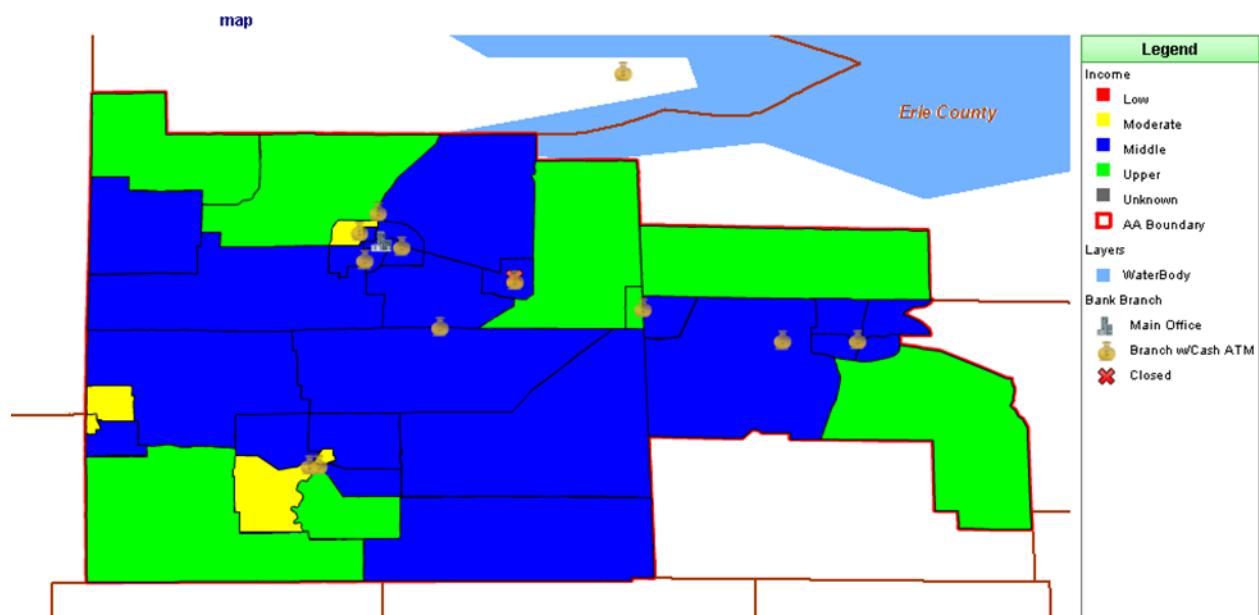
APPENDIX B

ASSESSMENT AREA MAPS

Toledo MSA Assessment Area



Non-MSA Ohio Assessment Area



APPENDIX C

GLOSSARY OF TERMS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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