PUBLIC DISCLOSURE

February 04, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Citizens Banking Company
RSSD #542528

100 East Water Street
Sandusky, Ohio 44870

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: 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 majority of loans and other lending-related activities are in the assessment area;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment 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,
- Community development performance demonstrates an adequate responsiveness to the community development needs of its assessment area.

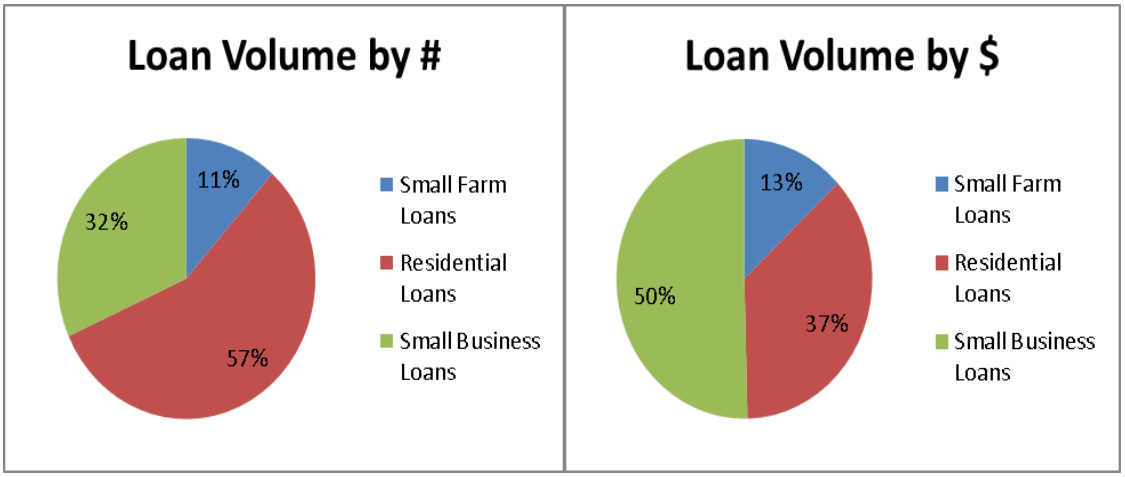
SCOPE OF EXAMINATION

The Citizens Banking Company is considered an intermediate small bank for the purposes of Regulation BB and will be evaluated using the standards required for intermediate small banks.

The Citizens Banking Company (Citizens) lending performance was evaluated using loan data for the period of July 1, 2010 through December 31, 2011. The major products reviewed for this evaluation were residential, small business, and small farm loans. Residential loans are comprised of home purchase, home improvement, refinance, and multi-family loans and were combined in this review. Small business loans are comprised of non-real estate and real estate-secured loans.

Community development activities for the period between July 1, 2010 and February 4, 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:



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

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

Lastly, two 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.

Citizens has seven assessment areas throughout Ohio, including:

Akron, Ohio MSA 10420
• Portions of Summit County

Columbus, Ohio MSA 18140
• Northwestern portion of Franklin County
• Southwestern portion of Delaware County
• Northern portion of Madison County

Mansfield, Ohio MSA 31900
• Northern and central portion of Richland County

Sandusky, Ohio 41780 MSA
• Erie County

Toledo, Ohio 45780 MSA
• Eastern portion of Ottawa County

Nonmetropolitan Area North Central Ohio
• Crawford County
• Huron County
• Eastern portion of Seneca County

Nonmetropolitan West Central Ohio
• Champaign County
• Logan County

Citizens' assessment areas in Sandusky, Ohio MSA 41780 and Nonmetropolitan North Central Ohio are given the greatest weight in this evaluation as they contain the largest percentage of branches and originated the largest amount of loans by volume. Citizens' main office is located in the Sandusky, Ohio MSA 41780 and of the 27 offices located throughout Citizens' assessment areas, 14 (51.9%) are located within these two assessment areas.

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

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

DESCRIPTION OF INSTITUTION

Citizens is the sole banking subsidiary and the primary holding company asset of First Citizens Banc Corp., both of which are located in Sandusky. As of September 30, 2012, Citizens reported $1.1 billion in total assets, which is the same level of assets at the previous examination date. The main branch is located at 100 East Water Street in Sandusky, Ohio.

At the time of this evaluation, Citizens had:

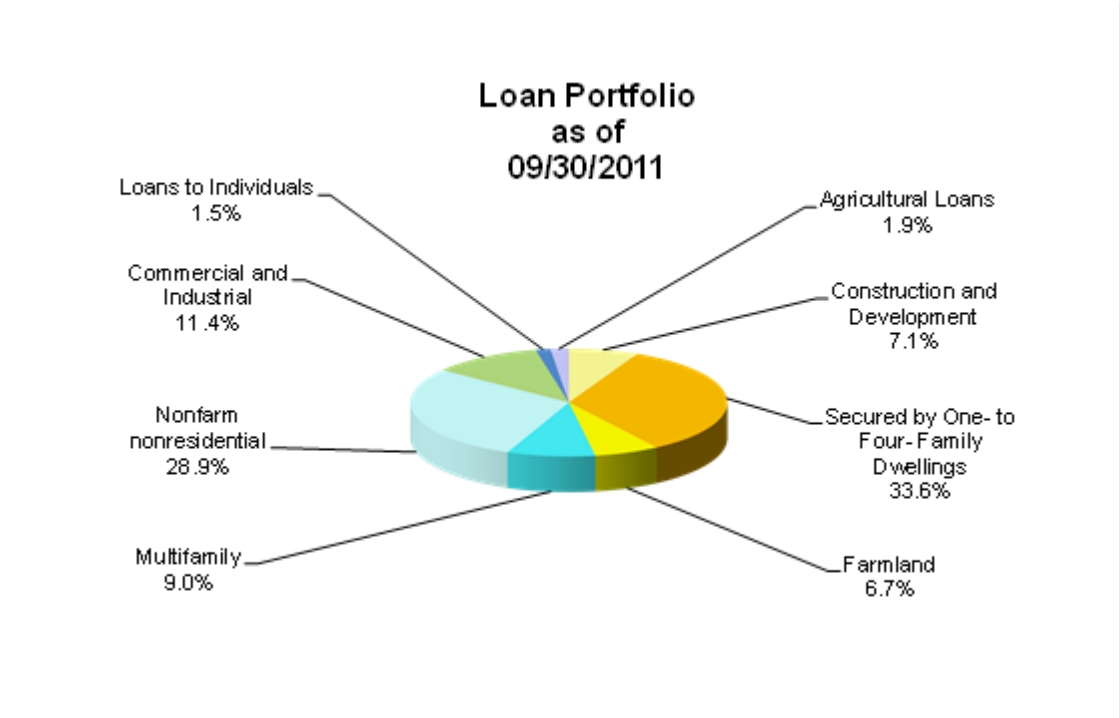
- 27 branch offices that included full service automated teller machines (ATMs)
- One branch office that does not have an ATM
- One loan operations center that included a cash-dispensing ATM
- Six stand-alone cash-dispensing ATMs

Citizens is a full-service retail bank offering business and consumer deposit accounts and commercial, agricultural, residential mortgage, and consumer loans. As of September 30, 2012, Citizens had $803 million in net loans and leases, which is approximately a $32 million (2.7%) decrease over the previous examination date. Loans comprised 69.9% of the bank's assets, consisting of primarily commercial loans by dollar volume. Securities made up the majority of the remaining assets at 18.8%.

The following chart represents the bank's loan portfolio as of September 30, 2012.

COMPOSITION OF LOAN PORTFOLIO						
	9/30/2012		12/31/2011		12/31/2010	
Loan Type	$ (000s)	Percent	$ (000s)	Percent	$ (000s)	Percent
Construction and Development	45,405	7.1%	39,789	6.6%	39,340	6.8%
Secured by One- to Four- Family Dwellings	214,817	33.6%	238,089	39.8%	253,932	43.8%
Other Real Estate: Farmland	42,772	6.7%	37,504	6.3%	41,106	7.1%
Multifamily	57,602	9.0%	33,608	5.6%	31,122	5.4%
Nonfarm nonresidential	185,283	28.9%	153,104	25.6%	117,965	20.4%
Commercial and Industrial	72,713	11.4%	69,604	11.6%	67,989	11.7%
Loans to Individuals	9,637	1.5%	10,609	1.8%	11,591	2.0%
Agricultural Loans	11,995	1.9%	16,583	2.8%	16,520	2.9%
Total	*$640,224*	*100.00%*	*$598,890*	*100.00%*	*$579,565*	*100.00%*

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



There are no legal or financial constraints preventing 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

Citizens Bank's overall performance under the Lending Test is rated "Satisfactory." The bank's performance in the Sandusky MSA, which received the greatest weight, is considered good for both CRA and HMDA lending. Lending is considered good in the nonmetropolitan north central Ohio area and is consistent with the Sandusky MSA. The bank did not generate enough CRA or HMDA loans in any other assessment area to draw meaningful conclusions.

Loan-to-Deposit Ratio

The following table shows Citizens' quarterly loan-to-deposit (LTD) ratios for the eight quarters since the previous evaluation, with the average LTD for the same period. The table includes the custom peer ratios that combine three local peer institutions[1].

Loan-to-Deposit Ratios							
CITIZENS BKG CO					CROGHAN COLONIAL BK	SUTTON BK	FIRST FS&LA
As of Date	Net Loans $(000s)	Total Deposits $(000s)	Bank Ratio	Aggregate Ratio	Peer 1 Ratio	Peer 2 Ratio	Peer 3 Ratio
December 31, 2012	797,684	935,809	85.24	74.21	61.91	75.46	82.11
September 30, 2012	781,933	922,102	84.80	74.93	61.56	75.35	85.13
June 30, 2012	752,977	903,528	83.34	74.84	59.34	74.82	86.27
March 31, 2012	742,478	925,847	80.19	73.66	56.23	71.22	89.51
December 31, 2011	764,609	908,966	84.12	75.23	59.22	73.16	0.00
September 30, 2011	756,048	919,273	82.24	75.67	67.93	71.99	0.00
June 30, 2011	744,011	886,824	83.90	76.40	71.92	73.10	0.00
March 31, 2011	728,513	915,627	79.56	76.33	73.39	72.16	0.00
December 31, 2010	745,555	900,908	82.76	78.10	75.06	75.58	0.00
September 30, 2010	764,335	911,906	83.82	79.37	78.42	74.93	0.00
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation			**83.00**	**75.87**	**66.50**	**73.78**	**85.76**

Citizens has averaged an 83.0% LTD ratio over the past eight quarters. The bank's ratios remained relatively consistent throughout the evaluation period. Citizens' average LTD ratio is above the custom peer group average LTD ratio of 58.2%. Citizens' loan-to-deposit ratio is reasonable given the bank's size, financial condition, and assessment area credit needs.

1 Custom Peer group consists of Croghan Colonial Bank, Sutton Bank, and First Federal Savings & Loan Association.

Assessment Area Concentration

The table below shows the distribution of loans inside and outside the bank's assessment areas. At 79.2% a majority of Citizen's loans were made within the bank's CRA delineated footprint.

Lending Inside and Outside the Assessment Area

Exam: Citizens Banking Co - Sandusky

Loan Type - Description	Inside				Outside				Total			
	#	%	$(000s)	%	#	%	$(000s)	%	#	%	$(000s)	%
CV - Home Purchase - Conventional	57	85.1	7,323	74.8	10	14.9	2,464	25.2	67	100.0	9,787	100.0
HI - Home Improvement	69	95.8	1,191	83.1	3	4.2	243	16.9	72	100.0	1,434	100.0
MF - Multi-Family Housing	1	12.5	113	1.2	7	87.5	9,545	98.8	8	100.0	9,658	100.0
RF - Refinancing	139	84.8	22,255	80.1	25	15.2	5,538	19.9	164	100.0	27,793	100.0
Total HMDA related	**266**	**85.5**	**30,882**	**63.4**	**45**	**14.5**	**17,790**	**36.6**	**311**	**100.0**	**48,672**	**100.0**
SB - Small Business	338	73.6	13,439	64.2	121	26.4	7,489	35.8	459	100.0	20,927	100.0
Total Small Bus. related	**338**	**73.6**	**13,439**	**64.2**	**121**	**26.4**	**7,489**	**35.8**	**459**	**100.0**	**20,927**	**100.0**
SF - Small Farm	107	83.6	2,521	70.5	21	16.4	1,055	29.5	128	100.0	3,575	100.0
Total Small Farm related	**107**	**83.6**	**2,521**	**70.5**	**21**	**16.4**	**1,055**	**29.5**	**128**	**100.0**	**3,575**	**100.0**
TOTAL LOANS	**711**	**79.2**	**46,841**	**64.0**	**187**	**20.8**	**26,333**	**36.0**	**898**	**100.0**	**73,175**	**100.0**

Geographic and Borrower Distribution

Overall, the geographic distribution of loans is considered reasonable and reflects a comparable performance to the distribution of loans among borrowers of different income levels and businesses of different revenue sizes. Refer to the respective assessment area analyses for further details.

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

Citizens has demonstrated an adequate responsiveness to community development lending needs. The bank originated 11 community development loans totaling $4,657,600. A majority of the loans were made to organizations that conduct community development services that were targeted to low- and moderate-income individuals.

Qualified Investments

Citizens has demonstrated an adequate responsiveness to community development investment needs. The bank made 11 qualified community development donations totaling $51,121 to organizations that provided community development services or economic development. In addition, the bank made three investments totaling $2,276,400 that will be used to provide affordable housing to low- and moderate-income families.

Community Development Services

Citizens has demonstrated an adequate responsiveness to community development service needs. The bank has 27 branches throughout its market. One (3.7%) located in the moderate-income tracts, 23 (85.2%) located in middle-income tracts and three (11.1%) located in upper-income tracts. There are no branches located in low-income geographies. 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 14 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 THE SANDUSKY, OHIO MSA 41780

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

Citizens had 37.8% of the deposits as of June 30, 2012 and is ranked first out of 11 institutions in this market. Key Bank, PNC, and First Federal Lorain had the second, third, and fourth highest shares at 21.7%, 12.6%, and 8.0%, respectively.

Erie County makes up the Sandusky metropolitan statistical area, which, according to the U.S. Census Bureau, has an estimated population of 76,751 as of July 1, 2011.

One community contact was conducted to provide additional information regarding the assessment area. The contact represented an affordable housing agency. According to the contact, there is a great need for LMI housing in Erie County and it appears to be improving. The contact opened a waiting list for its properties in 2010 and closed it within a day, receiving a thousand names. The biggest challenge regarding banking is getting program participants and applicants ready for home ownership. There is 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 finding funding from the local banks in the area. Local banks have done a good job of being involved in the community and helping provide funding for affordable housing. Community banks such as Citizens are very involved in the community and representatives sit on many boards and committees. The contact has also received assistance from larger banks, such as National City and Fifth Third.

Population Characteristics

The population in the assessment area was 79,551 in 2000, with about 24.2% of the population living in moderate-income tracts. In addition, 75.3% of the population was 18 years of age or older, which is the legal age to enter into a contract.

According to the U.S. Census Bureau, the population from 2000 through 2011 has decreased from 79,551 in 2000 to an estimated 76,751 as of July 1, 2011. The percentage of the population decrease during that time period was 3.5%.

Income Characteristics

In 2000, the assessment area's median family income was $51,747, which was higher than Ohio's median family income of $50,037. The table below indicates the most recent median family income for the MSA.

Borrower Income Levels
Sandusky Ohio MSA

HUD Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2010	**$64,000**	0 - $31,999	$32,000 - $51,199	$51,200 - $76,799	$76,800 - & above
2011	**$63,300**	0 - $31,649	$31,650 - $50,639	$50,640 - $75,959	$75,960 - & above

In 2000, the assessment area contained 31,756 households, of which 21,939 (69.1%) were families. Of the total families in the assessment area, 19.0% were low-income, 18.6% were moderate-income, 23.3% were middle-income, 39.1% were upper-income, and 6.0% of the families were below the poverty level.

Housing Characteristics

There were 35,909 housing units in the assessment area as of the 2000 U.S. Census. The owner-occupancy rate was 63.6%. From a tract income perspective, 24.8% of housing units and 18.6% of owner-occupied units were in moderate-income tracts.

As of the 2000 U.S. Census, the median age of the housing stock in this assessment area was 40 years, with 34.3% of the stock built before 1950.

The median housing value in this assessment area was $107,435 with an affordability ratio of 39.8. A higher housing affordability ratio indicates relatively more affordability. A ratio of 100 indicates that median- family income is just sufficient to purchase the median-priced home. When the ratio falls below 100, the typical household has less income than necessary to purchase the typical house.

According to RealtyTrac,[2] a leading source for foreclosure information, the following information about foreclosure filings and the number of properties in foreclosure in this assessment area indicates that foreclosure rates in Erie County are slightly better than the State of Ohio but slightly worse than the United States:

Location	Foreclosed Properties in January 2013	Ratio of Properties Receiving Foreclosure Filings in January 2013
Erie County	49	1:723
Ohio	**8,360**	**1:612**
United States	**151,481**	**1:869**

2 http://www.realtytrac.com/trendcenter/

The median gross rent in the assessment area was $497 as of 2000. The lowest rents (those less than $350) only accounted for 16.2% of the units. Conversely, rental costs between $350 and $500 comprised the highest percentage of rental units at 30.9%. Also, 42.8% of the housing units in moderate-income tracts are comprised of rental units in this assessment area. These numbers indicate that demand for single-family home loans could be concentrated in middle- and upper-income tracts.

Labor, Employment, and Economic Characteristics

Major employers[3] in this assessment area include, but are not limited to the following:

County Name	Major Employers
Erie	Firelands Regional Medical Center, Cedar Point, Kalahari Resort, Automotive Component Holdings, Kyklos Bearings International

The following table illustrates the unadjusted unemployment rates for 2010 and 2011 for the assessment area, Ohio and the nation.

Unemployment Rates

Assessment Area: Sandusky OH MSA

Area	Years - Annualized	
	2010	**2011**
Erie Co.	10.4	8.7
Sandusky, OH MSA	10.4	8.7
Ohio	**10.0**	**8.6**

Not Seasonally Adjusted

As shown above, county and state unemployment rates continue to drop since the end of 2010.

3 http://www.eriecountydev.com/major-employers.html

Combined Demographics Report

Assessment Area(s): Sandusky, Ohio MSA 41780 - 2010

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,169	19.0
Moderate-income	5	27.8	4,848	22.1	763	15.7	4,076	18.6
Middle-income	10	55.6	13,817	63.0	460	3.3	5,119	23.3
Upper-income	3	16.7	3,274	14.9	95	2.9	8,575	39.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**18**	**100.0**	**21,939**	**100.0**	**1,318**	**6.0**	**21,939**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	8,914	4,244	18.6	47.6	3,818	42.8	852	9.6
Middle-income	21,033	14,984	65.6	71.2	3,980	18.9	2,069	9.8
Upper-income	5,962	3,626	15.9	60.8	1,075	18.0	1,261	21.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**35,909**	**22,854**	**100.0**	**63.6**	**8,873**	**24.7**	**4,182**	**11.6**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	769	22.1	659	21.6	64	28.2	46	22.4
Middle-income	2,144	61.5	1,886	61.7	127	55.9	131	63.9
Upper-income	574	16.5	510	16.7	36	15.9	28	13.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**3,487**	**100.0**	**3,055**	**100.0**	**227**	**100.0**	**205**	**100.0**
	Percentage of Total Businesses:			**87.6**		**6.5**		**5.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1	0.7	1	0.7	0	0.0	0	0.0
Middle-income	131	86.8	131	86.8	0	0.0	0	0.0
Upper-income	19	12.6	19	12.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**151**	**100.0**	**151**	**100.0**	**0**	**.0**	**0**	**.0**
	Percentage of Total Farms:			**100.0**		**.0**		**.0**

Based on 2010 D&B information according to 2000 Census Boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Lending Test

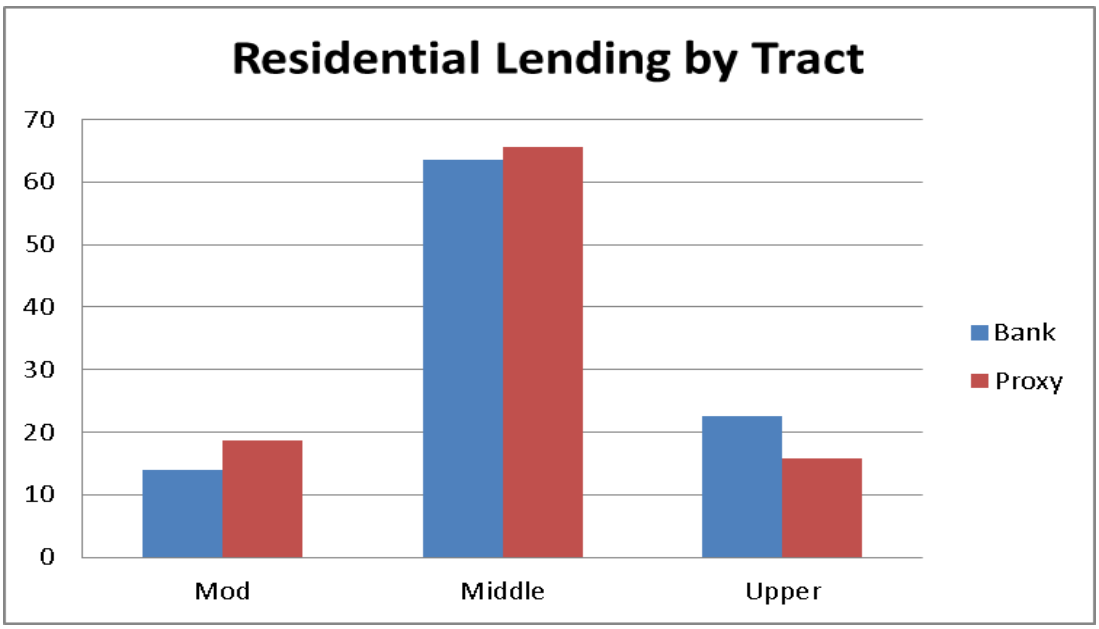
Lending performance is considered good.

Geographic Distribution

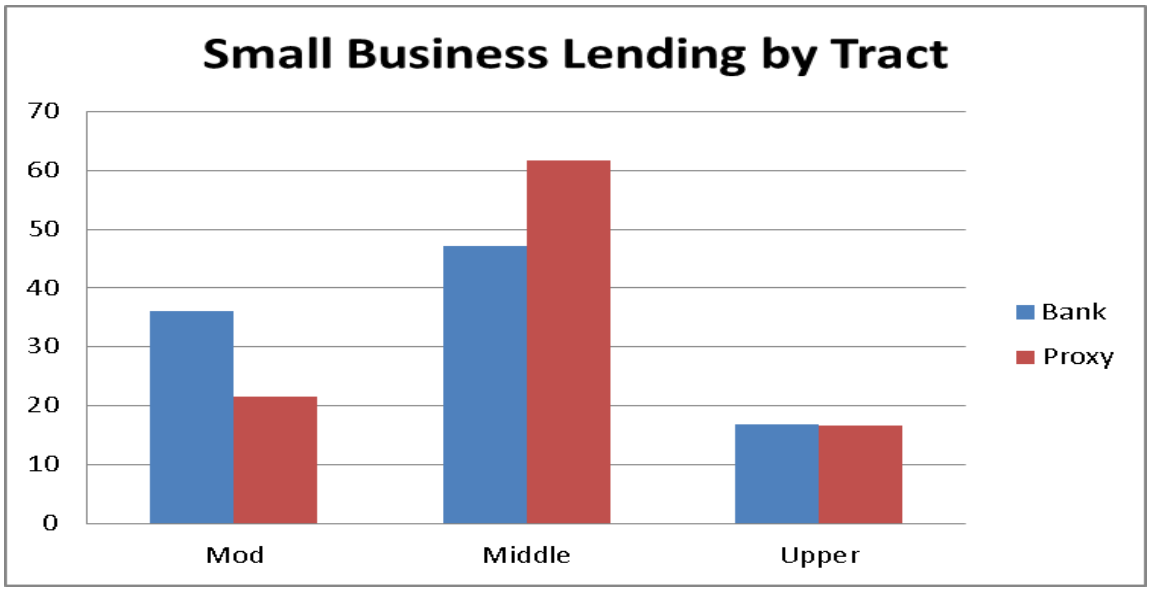
For the Sandusky MSA, borrower distribution received slightly greater weight than geographic distribution based on the overall assessment area's percentage of low- and moderate-income families at 37.6% compared to the percentage of low- and moderate-income geographies at 27.8%.

Overall, Citizens' distribution of loans among geographies is considered reasonable. Residential lending, which received the greatest weight, is reasonable. Small business lending, which received the least weight, is also reasonable.

No gaps in lending were noted. During the evaluation period, Citizens originated loans in 100 percent of its census tracts.



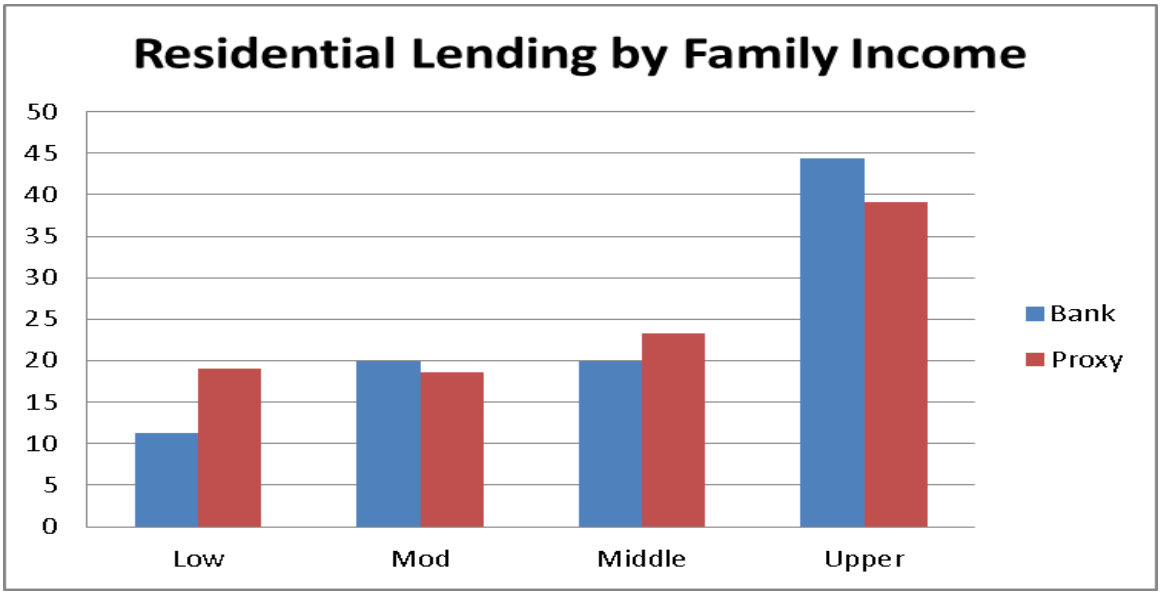
As shown in the chart above, the bank's residential lending in moderate-, middle-, and upper-income tracts was generally in line with the percentage of owner-occupied units in these tracts for the assessment area.



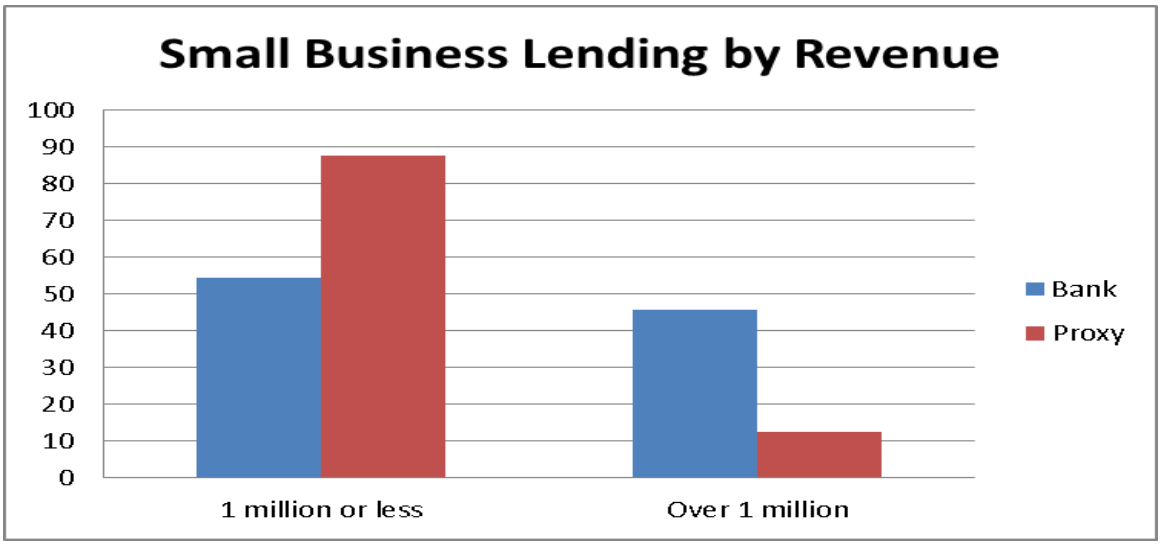
As shown in the chart above, the bank's small business lending significantly exceeded proxy within the moderate income tracts in this assessment area, with 36.0% of small business loans in these tracts as compared to the total percentage of business in these tracts only accounting for 22.1%. The bank was in line with upper income tracts and below the proxy for middle income tracts, resulting in excellent performance for small business lending in this MSA.

Distribution by Borrower Income and Revenue Size of the Business

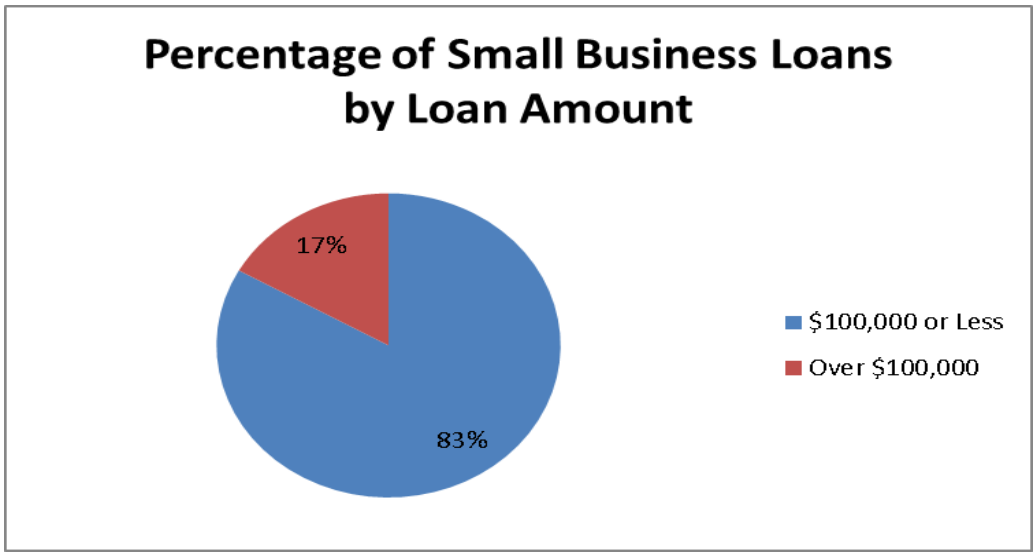
Overall, the distribution of loans based on borrower's income and for businesses of different revenue sizes is reasonable.



As shown in the chart above, the borrower distribution of residential loans to low-income borrowers is substantially below the percentage of families (proxy). However, the bank outperformed the proxy for moderate income families. Middle income lending was in line with proxy, while the bank outperformed with upper income families. While the bank underperformed with low-income families, this difference is reasonable due to the affordability index issues as previously discussed.



As shown in the chart above, the bank did an adequate job of originating loans to businesses with revenues under $1 million (small businesses) as compared to proxy. However, as the following graph indicates, 83.2% of the bank'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.



Community Development Test

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

Community Development Loans

Citizens demonstrated an adequate responsiveness to community development lending needs in this assessment area. The bank originated four community development loans for economic development, a day care facility sponsored by the Department of Job and Family Services, and two multi-family low-income housing projects located in a moderate income tract. The four loans totaled $563,000.

Qualified Investments

Citizens demonstrated an adequate responsiveness to community development investment needs. The bank's qualified investments consisted of donations to a community development organization and two food banks. The bank made three qualified donations during this evaluation period within this assessment area totaling $23,404.

Community Development Services

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

Geography	Number and % of Tracts	Number and % of Branches	Number and % of ATMs	Percent of Families by Tract Income	Total Businesses
Moderate-Income	5 (27.8%)	1 (16.7%)	1 (12.5%)	22.1%	22.1%
Middle-Income	10 (55.5%)	4 (66.6%)	6 (75.0%)	63.0%	61.5%
Upper-Income	3(16.7%)	1 (16.7%)	1 (12.5%)	14.9%	16.5%
Totals	**18**	**6**	**8**	**100%**	**100%**

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

The bank's employees provide their financial expertise to local organizations that provide community development and affordable housing services to the community through board and committee memberships. Below is a list of organizations and services provided in this assessment area.

Habitat for Humanity, Firelands	Member - Development Committee	Organization builds homes for LMI individuals and families
Serving Our Seniors	Finance Committee	Dedicated to helping Erie County Seniors the majority of which qualify as LMI
Chamber of Commerce - Sandusky	Member; Business Development Committee	Economic development in the city of Sandusky
United Way - Tax Assistance Program	OBB Counselor – Prepared and filed taxes for low income clients	The goal of the program is to help low income individuals with free tax assistance and tax filing – both Federal and State.

DESCRIPTION OF NORTH CENTRAL OHIO NONMETROPOLITAN AREA

The Nonmetropolitan Area North Central Ohio assessment area consists of the entireties of Huron and Crawford Counties and the eastern portion of Seneca County. The assessment area consists of 28 census tracts, of which there is one moderate-income, 23 middle-income, and four upper-income census tracts. All middle-income tracts in Huron and Crawford Counties have been designated as distressed areas due to unemployment rates. This represents 21 middle-income tracts or 91.3% of all middle-income tracts in this assessment area and comprises 75.0% of all tracts in the assessment area.

Citizens had 7.6% of the deposits as of June 30, 2012 and ranked third out of 23 institutions in this market. PNC, The Old Fort Banking Company, and Sutton Bank had the first, second, and fourth highest shares at 9.9%, 8.0%, and 7.4%, respectively.

One community contact was conducted to provide additional information regarding the assessment area. The contact provided insight into the economic development of Huron County. According to the contact, Huron County has recently led Ohio for unemployment and it continues to be a big 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. 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.

Population Characteristics

Data released by the U.S. Census Bureau in 2000 indicates the population within the assessment area was 114,925, with only about 3.3% of the population living in the moderate-income tract. In addition, 74.0% of the population was 18 years of age or older, which is the legal age to enter into a contract.

Income Characteristics

In 2000, the assessment area's median family income was $45,299, which was lower than Ohio's median family income of $50,037.

In 2000, the assessment area contained 44,260 households, of which 31,810 (71.9%) were families. Of the total families in the assessment area, 15.5% were low-income, 19.4% were moderate-income, 24.8% were middle-income, 40.2% were upper-income, and 6.9% of the families were below the poverty level.

Housing Characteristics

There were 47,014 housing units in the assessment area as of the 2000 U.S. Census. The owner-occupancy rate was 68.9%. From a tract income perspective, 3.7% of housing units and 3.0% of owner-occupied units were in the moderate-income tract.

As of the 2000 U.S. Census, the median age of the housing stock in this assessment area was 45 years, with 42.3% of the stock built before 1950.

The median housing value in this assessment area was $86,519 with an affordability ratio of 44.9. A higher housing affordability ratio indicates relatively more affordability. A ratio of 100 indicates that median- family income is just sufficient to purchase the median-priced home. When the ratio falls below 100, the typical household has less income than necessary to purchase the typical house.

According to RealtyTrac,[4] a leading source for foreclosure information, the following information about foreclosure filings and the number of properties in foreclosure for all counties in this assessment area indicates Huron and Seneca counties have higher foreclosure rates than the State of Ohio and US while Crawford County is just slightly better than the State of Ohio:

Location	Foreclosed Properties in January 2013	Ratio of Properties Receiving Foreclosure Filings in January 2013
Crawford County	30	1:673
Huron County	46	1:547
Seneca County	48	1:503
Ohio	8,360	1:612
United States	151,481	1:869

The median gross rent in the assessment area was $446 as of 2000. The lowest rents (those less than $350) accounted for 23.5% of the units. Conversely, rental costs between $350 and $500 comprised the highest percentage of rental units at 33.1%. Also, 39.1% of the housing units in moderate-income tracts are comprised of rental units in this assessment area. These numbers indicate that demand for single-family home loans could be concentrated in middle- and upper-income tracts.

4 http://www.realtytrac.com/trendcenter/

Labor, Employment, and Economic Characteristics

Major employers[5] in this assessment area include, but are not limited to, the following:

County Name	Major Employers
Seneca	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
Huron	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 R R Donnelley & Sons Co
Crawford	Bucyrus Precision Tech Inc Crawford County Government Galion City Schools Galion Community Hospital General Electric Co Imasen Bucyrus Technology Inc PPG Industries Inc Timken Co

The following table illustrates the unadjusted unemployment rates for 2010 and 2011 for the assessment area, Ohio, and the nation.

5 http://www.development.ohio.gov/reports/reports_countytrends_map.htm

Unemployment Rates
Assessment Area: Non MSA OH

Area	Years - Annualized	
	2010	**2011**
Crawford Co.	12.4	11.2
Champaign Co.	11.2	9.2
Huron Co.	13.6	11.7
Logan Co.	11.2	9.3
Seneca Co.	11.5	9.3
Ohio	**10.0**	**8.6**

Not Seasonally Adjusted

As shown above, county and state unemployment rates continue to drop since the end of 2010 but remain elevated for Crawford and Huron counties.

Combined Demographics Report

Assessment Area(s): Non Metro Area North Central Ohio - 2010

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,938	15.5
Moderate-income	1	3.6	1,062	3.3	179	16.9	6,168	19.4
Middle-income	23	82.1	26,286	82.6	1,821	6.9	7,901	24.8
Upper-income	4	14.3	4,462	14.0	199	4.5	12,803	40.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**28**	**100.0**	**31,810**	**100.0**	**2,199**	**6.9**	**31,810**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	1,725	956	3.0	55.4	674	39.1	95	5.5
Middle-income	39,177	26,658	82.3	68.0	10,286	26.3	2,233	5.7
Upper-income	6,112	4,786	14.8	78.3	967	15.8	359	5.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**47,014**	**32,400**	**100.0**	**68.9**	**11,927**	**25.4**	**2,687**	**5.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	86	1.9	74	1.9	7	2.7	5	2.0
Middle-income	3,761	85.0	3,310	84.5	232	88.9	219	88.7
Upper-income	577	13.0	532	13.6	22	8.4	23	9.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**4,424**	**100.0**	**3,916**	**100.0**	**261**	**100.0**	**247**	**100.0**
	Percentage of Total Businesses:			**88.5**		**5.9**		**5.6**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	4	0.5	4	0.6	0	0.0	0	0.0
Middle-income	559	76.6	553	76.5	4	80.0	2	100.0
Upper-income	167	22.9	166	23.0	1	20.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**730**	**100.0**	**723**	**100.0**	**5**	**100.0**	**2**	**100.0**
	Percentage of Total Farms:			**99.0**		**.7**		**.3**

Based on 2010 D&B information according to 2000 Census Boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Lending Test

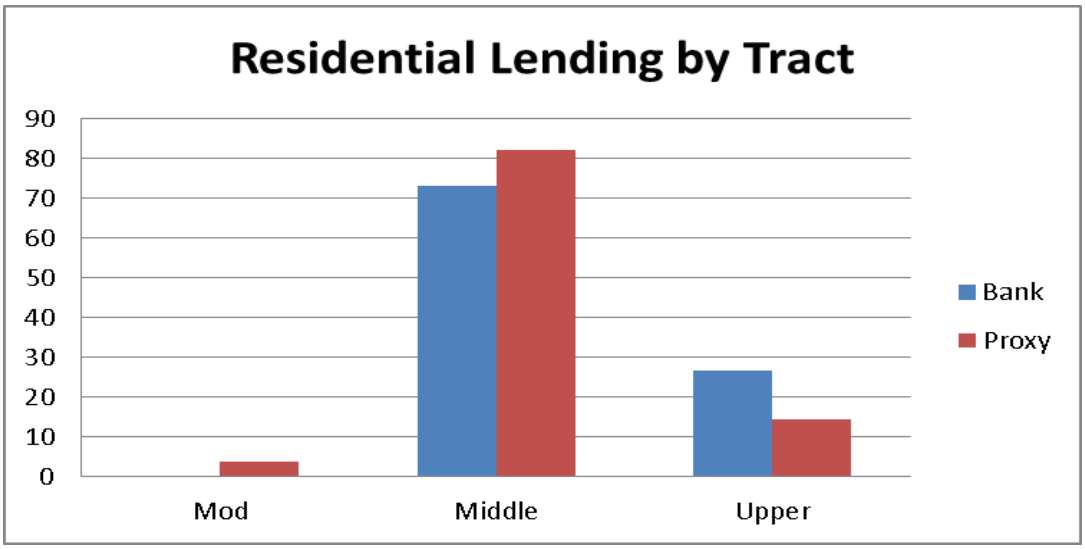
Lending performance is considered good.

Geographic Distribution

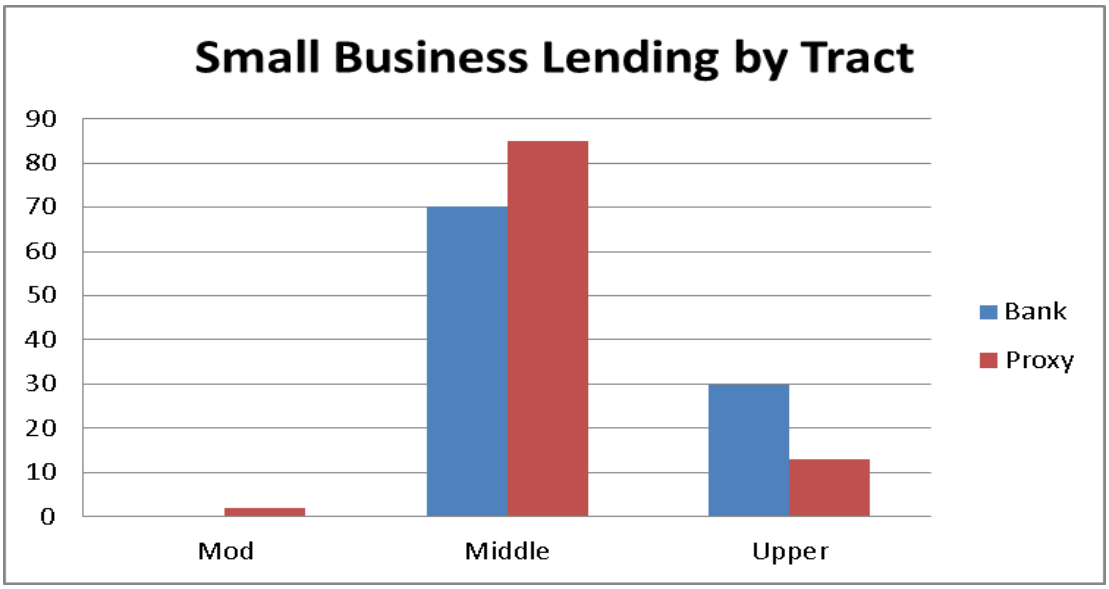
For the North Central Ohio non-metropolitan area, borrower distribution received greater weight than geographic distribution based on the overall assessment area's percentage of low- and moderate-income families at 34.9% compared to the percentage of low- and moderate-income geographies at 3.6%.

Overall, Citizens' distribution of loans among geographies is considered reasonable. Residential lending, which received the greatest weight, is reasonable. Small business lending is also reasonable.

During the evaluation period, Citizens originated loans in 25 of the 28 tracts for an 89.3% tract penetration rate. The three tracts where no loans were originated included the lone moderate-income tract, one middle-income tract, and one upper-income tract.



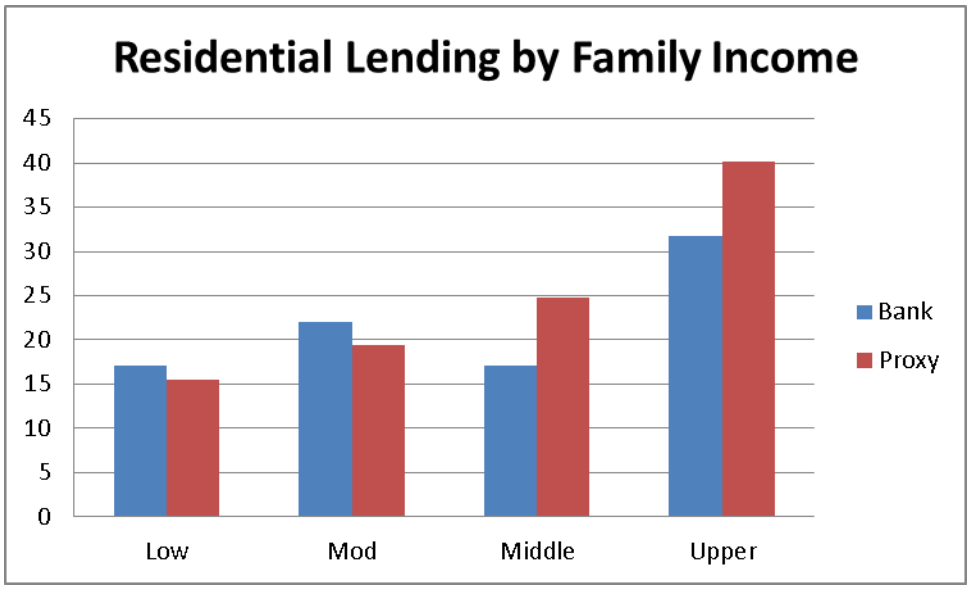
As shown in the chart above, the bank's residential lending in moderate-, middle-, and upper-income tracts was generally in line with the percentage of owner-occupied units in these tracts for the assessment area.



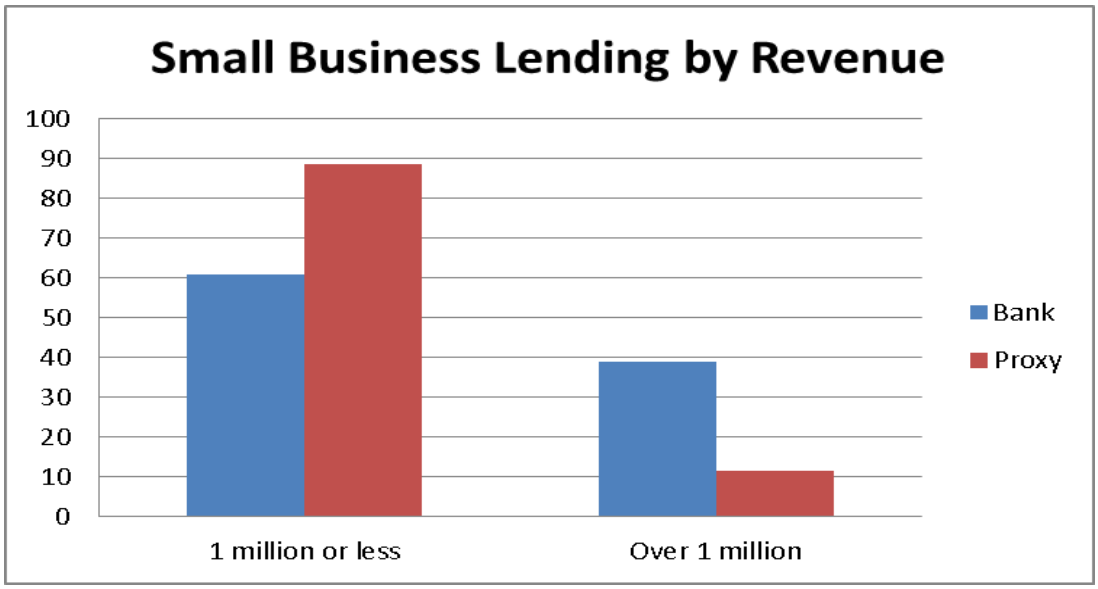
As shown in the chart above, the bank's small business lending was below the proxy for both the moderate- and middle-income tracts resulting in reasonable performance for small business lending in this MSA.

Distribution by Borrower Income and Revenue Size of the Business

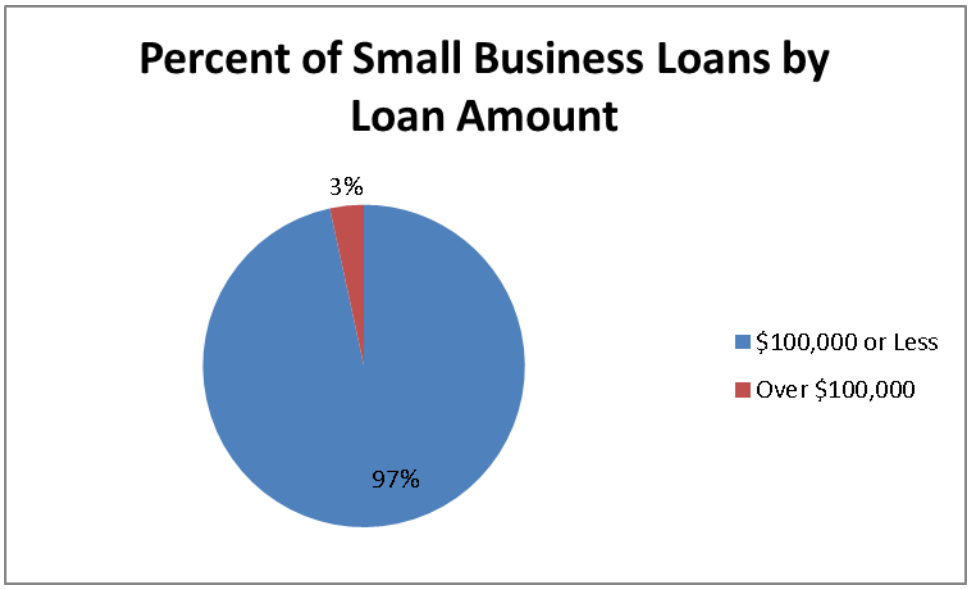
Overall, the distribution of loans based on borrower's income and for businesses of different revenue sizes is reasonable.



As shown in the chart above, the borrower distribution of residential loans to low-income and moderate income borrowers is above the percentage of families (proxy), demonstrating an excellent borrower distribution of residential loans to low- and moderate-income families in this assessment area. Further, while these low and moderate income families only made up 34.9% of the families in this assessment area, they accounted for 39.1% of the bank's lending. Middle- and upper-income lending was therefore below the proxy. This fact is especially impactful when considering the affordability index issues as previously discussed.



As shown in the chart above, the bank did an adequate job of originating loans to businesses with revenues under 1 million (small businesses) as compared to proxy. However, as the following graph indicates, 97.0.0% of the bank'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 as 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.



Community Development Test

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

Community Development Loans

Citizens demonstrated an adequate responsiveness to community development lending needs in this assessment area. The bank originated three community development loans. Two loans were for economic development and one was for a large farming complex to fund operations and expansion of a farm project that predominantly hires migrant workers, providing low-income housing and health care on the complex. The facility is located in a distressed tract and hires around 500 workers.

Qualified Investments

Citizens demonstrated an adequate responsiveness to community development investment needs. The bank's qualified investments consisted of a CMB development housing bond and three qualifying donations. Two of the donations were to community development organizations and one was to a local food bank. The three qualified donations during this evaluation period within this assessment area totaled $20,750.

Community Development Services

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

Geography	Number and % of Tracts	Number and % of Branches	Number and % of ATMs	Percent of Families by Tract Income	Total Businesses
Moderate-Income	1 (3.6%)	0 (0%)	0 (0%)	3.34%	2.0%
Middle-Income	23 (82.1%)	8 (100%)	8 (100%)	82.63%	85.0%
Upper-Income	4 (14.3%)	0 (0%)	0 (0%)	14.03%	13.0%
Totals	**28**	**8**	**8**	**100%**	**100%**

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

The bank's employees provide their financial expertise to local organizations that provide community development and affordable housing services to the community through board and committee memberships. The following is a list of organizations and services provided in this assessment area.

Norwalk Area United Fund	Budget/Allocation Committee	Allocation of pledged donations to deserving charitable organizations. Many programs target LMI individuals
Main St. Norwalk	Economic Restructuring Committee	Promotes economic development of uptown area
Firelands Habitat for Humanity	Volunteer/Provides Legal Services	Agency builds homes for low income families
New Washington Development LTD	Treasurer	Renovate downtown New Washington Streetscape
Norwalk Area United Fund	Budget & Allocation Committee	Allocation of pledged donations to deserving charitable organizations. Many programs target LMI individuals

DESCRIPTION OF MANSFIELD, OHIO MSA 31900

The Mansfield, Ohio MSA assessment area consists entirely of census tracts in Richland County. Specifically, this assessment area contains 30 of the 32 census tracts in Richland County. The 30 tracts are comprised of one low-income, eight moderate-income, 15 middle-income, and six upper-income census tracts. This assessment area accounted for 8.8% (79 loans) of the bank's lending.

Citizens had 7.1% of the deposits in this assessment area as of June 30, 2011, which ranked the bank sixth of 14 institutions. The Park National Bank had the highest market share, with 27.2% of the deposits. Mechanics Bank and JP Morgan Chase had the second and third highest shares, with 19.5% and 12.1%, respectively.

During this review period, Citizens originated 34 residential loans and 45 small business loans, which represent 12.8% and 13.3%, respectively of total loans originated during this evaluation period. This assessment area had the third highest number of loans during this period.

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

The following table shows the demographics for this assessment area using data from the 2000 Census.

Combined Demographics Report

Assessment Area(s): Mansfield, Ohio MSA 31900 - 2010

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.1	82	0.2	7	8.5	6,166	17.9
Moderate-income	8	25.0	5,686	16.5	1,178	20.7	6,638	19.3
Middle-income	17	53.1	19,429	56.5	1,351	7.0	8,030	23.4
Upper-income	6	18.8	9,161	26.7	284	3.1	13,524	39.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**32**	**100.0**	**34,358**	**100.0**	**2,820**	**8.2**	**34,358**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	225	58	0.2	25.8	121	53.8	46	20.4
Moderate-income	10,512	5,023	14.2	47.8	4,158	39.6	1,331	12.7
Middle-income	29,402	20,586	58.1	70.0	7,257	24.7	1,559	5.3
Upper-income	12,923	9,777	27.6	75.7	2,554	19.8	592	4.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**53,062**	**35,444**	**100.0**	**66.8**	**14,090**	**26.6**	**3,528**	**6.6**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	131	2.7	95	2.2	18	6.3	18	6.9
Moderate-income	939	19.2	811	18.7	70	24.6	58	22.2
Middle-income	2,477	50.6	2,209	50.8	140	49.1	128	49.0
Upper-income	1,347	27.5	1,233	28.4	57	20.0	57	21.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**4,894**	**100.0**	**4,348**	**100.0**	**285**	**100.0**	**261**	**100.0**
	Percentage of Total Businesses:			**88.8**		**5.8**		**5.3**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	2	0.7	2	0.7	0	0.0	0	0.0
Middle-income	231	79.9	230	80.4	1	50.0	0	0.0
Upper-income	56	19.4	54	18.9	1	50.0	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**289**	**100.0**	**286**	**100.0**	**2**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:			**99.0**		**.7**		**.3**

Based on 2010 D&B information according to 2000 Census Boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MANSFIELD, OHIO MSA #31900

Lending Test

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

Community Development Test

The bank made one community development loan in this MSA for $2.2 million for the construction of a multi-unit housing complex for low income individuals.

The institution funded two investments totaling $286,000 during the evaluation period. This was a limited partnership in the Ohio Equity Fund for Housing in 2011 and low-income housing tax credits obtained in 2012. Total investments totaled $2 million and were spread among seven distinct areas.

Of the bank's total community development investments, 11.5% were made in this assessment area, which is in line with the percentage of total deposits at 13.7% and slightly less than the percentage of branch offices at 14.8%. This is considered to be an adequate level of qualified community development investments, which is consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

Service Test

Retail services are consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

Citizens provided community development services to seven organizations in the MSA. These organizations consisted of homeownership counseling, small business start-up support, and low-income housing organization business support. Community development services are considered adequate for this assessment area and consistent with the performance level of qualified community development services, which is consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

DESCRIPTION OF WEST CENTRAL OHIO NONMETROPOLITAN AREA

The Nonmetropolitan West Central Area assessment area consists of the entireties of Champaign and Logan Counties. The assessment area is comprised of 18 census tracts, of which there are two moderate-income, 11 middle-income, and five upper-income census tracts. This assessment area accounted for 6.5% (59 loans) of the bank's lending.

Citizens had 11.8% of the deposits in this assessment area as of June 30, 2011, which ranked the bank second of 17 institutions. Perpetual Federal Savings Bank had the highest market share with 23.4% of the deposits. Citizens Federal and Huntington had the third and fourth highest shares with 11.3% and 10.1%, respectively.

During this review period, Citizens originated 22 residential loans and 37 small business loans, which represent 8.3% and 10.9%, respectively, of total loans originated during this evaluation period. This assessment area had the fourth highest number of loans during this period.

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

The following table shows the demographics for this assessment area using data from the 2000 Census.

Combined Demographics Report

Assessment Area(s): Non Metro West Central Ohio - 2010

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,264	13.8
Moderate-income	2	11.1	2,177	9.2	275	12.6	4,027	17.0
Middle-income	11	61.1	13,088	55.4	871	6.7	5,543	23.5
Upper-income	5	27.8	8,363	35.4	306	3.7	10,794	45.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**18**	**100.0**	**23,628**	**100.0**	**1,452**	**6.1**	**23,628**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	3,780	2,044	8.2	54.1	1,481	39.2	255	6.7
Middle-income	22,199	13,887	55.7	62.6	4,676	21.1	3,636	16.4
Upper-income	11,482	9,005	36.1	78.4	1,815	15.8	662	5.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**37,461**	**24,936**	**100.0**	**66.6**	**7,972**	**21.3**	**4,553**	**12.2**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	321	9.2	280	8.8	23	16.0	18	9.8
Middle-income	2,146	61.3	1,929	60.8	94	65.3	123	66.8
Upper-income	1,036	29.6	966	30.4	27	18.8	43	23.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**3,503**	**100.0**	**3,175**	**100.0**	**144**	**100.0**	**184**	**100.0**
	Percentage of Total Businesses:			**90.6**		**4.1**		**5.3**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	10	1.8	10	1.9	0	0.0	0	0.0
Middle-income	310	57.0	307	57.1	3	60.0	0	0.0
Upper-income	224	41.2	221	41.1	2	40.0	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**544**	**100.0**	**538**	**100.0**	**5**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:			**98.9**		**.9**		**.2**

Based on 2010 D&B information according to 2000 Census Boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WEST CENTRAL OHIO NONMETROPOLITAN AREA

Lending Test

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

Community Development Test

The bank made one community development loans in this MSA for $350,000 for affordable housing for seniors.

The institution funded two investments totaling $286,000 during the evaluation period. This was a limited partnership in the Ohio Equity Fund for Housing in 2011 and low-income housing tax credits obtained in 2012. Total investments totaled $2 million and were spread among seven distinct areas.

Of the bank's total community development investments, 11.5% were made in this assessment area, which is in line with the both the percentage of total deposits at 16.1% and the percentage of branch offices at 14.8%. This is considered to be an adequate level of qualified community development investments, which is consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

Service Test

Retail services are consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

Citizens did not provide any community development services in this assessment area. Community development services are considered poor for this assessment area.

DESCRIPTION OF COLUMBUS, OHIO MSA 18140

The Columbus, Ohio MSA 18140 assessment area contains portions of Franklin, Delaware, and Madison Counties. The assessment area consists of 25 tracts, of which nine are middle-income and 16 are upper-income tracts. This assessment area accounted for 2.4% (22 loans) of the bank's lending.

Citizens had 0.1% of the deposits in this assessment area as of June 30, 2011, which ranked the bank 32nd of 42 institutions. Huntington had the highest market share with 30.2% of the deposits. JP Morgan Chase and PNC had the second and third highest shares with 22.6% and 12.7%, respectively.

During this review period, Citizens originated six residential loans and 16 small business loans, which represent 2.3% and 4.7%, respectively, of total loans originated during this evaluation period. This assessment area had the sixth highest number of loans during this period.

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

The following table shows the demographics for this assessment area using data from the 2000 Census.

Combined Demographics Report

Assessment Area(s): Columbus, Ohio MSA 18140 - 2010

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,050	7.6
Moderate-income	0	0.0	0	0.0	0	0.0	4,556	11.3
Middle-income	9	36.0	13,360	33.1	466	3.5	8,806	21.8
Upper-income	16	64.0	27,017	66.9	365	1.4	23,965	59.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**25**	**100.0**	**40,377**	**100.0**	**831**	**2.1**	**40,377**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	22,299	11,831	30.2	53.1	9,197	41.2	1,271	5.7
Upper-income	39,140	27,380	69.8	70.0	9,789	25.0	1,971	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**61,439**	**39,211**	**100.0**	**63.8**	**18,986**	**30.9**	**3,242**	**5.3**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	2,574	32.2	2,201	31.4	208	38.9	165	35.8
Upper-income	5,421	67.8	4,798	68.6	327	61.1	296	64.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**7,995**	**100.0**	**6,999**	**100.0**	**535**	**100.0**	**461**	**100.0**
	Percentage of Total Businesses:			**87.5**		**6.7**		**5.8**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	75	56.4	74	56.5	1	100.0	0	0.0
Upper-income	58	43.6	57	43.5	0	0.0	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**133**	**100.0**	**131**	**100.0**	**1**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:			**98.5**		**.8**		**.8**

Based on 2010 D&B information according to 2000 Census Boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBUS OHIO MSA #18140

Lending Test

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

Community Development Test

The bank did not make any community development loans in this MSA.

The institution funded two investments totaling $1,142,000 during the evaluation period. This was a limited partnership in the Ohio Equity Fund for Housing in 2011 and low-income housing tax credits obtained in 2012. Total investments totaled $2 million and were spread among seven distinct areas, four of which were in the Columbus MSA.

Of the bank's total community development investments, 48.0% were made in this assessment area, which is well over the percentage of total deposits at 4.5% and also well above the percentage of branch offices at 11.1%. This is considered to be an excellent level of qualified community development investments, which is consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

Service Test

Retail services are consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

Citizens provided community development services to two organizations in the MSA. These organizations consisted of an organization providing small business start-up support, and various services to low-income individuals and families. Community development services are considered adequate for this assessment area and consistent with the performance level of qualified community development services, which is consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

DESCRIPTION OF TOLEDO, OHIO MSA 45780

The Toledo, Ohio MSA 45780 assessment area consists of portions of Ottawa County. The assessment area contains six middle-income census tracts. Lending in this assessment area accounted for 2.9% (27 loans) of the bank's lending.

Citizens had 0.7% of the deposits in this assessment area as of June 30, 2011, which ranked the bank 12th of 13 institutions. Huntington had the highest market share with 24.7% of the deposits. National Bank of Ohio and The Genoa Banking Company had the second and third highest shares with 22.6% and 16.2%, respectively.

During this review period, Citizens originated nine residential loans and 18 small business loans, which represent 3.4% and 5.3%, respectively, of total loans originated during this evaluation period. This assessment area had the fifth highest number of loans during this period.

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

The following table shows the demographics for this assessment area using data from the 2000 Census.

Combined Demographics Report

Assessment Area(s): Toledo, Ohio MSA 45780 - 2010

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	992	17.8
Moderate-income	0	0.0	0	0.0	0	0.0	1,126	20.2
Middle-income	6	100.0	5,575	100.0	294	5.3	1,437	25.8
Upper-income	0	0.0	0	0.0	0	0.0	2,020	36.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**6**	**100.0**	**5,575**	**100.0**	**294**	**5.3**	**5,575**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	16,399	6,477	100.0	39.5	1,872	11.4	8,050	49.1
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**16,399**	**6,477**	**100.0**	**39.5**	**1,872**	**11.4**	**8,050**	**49.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	1,348	100.0	1,191	100.0	59	100.0	98	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	**1,348**	**100.0**	**1,191**	**100.0**	**59**	**100.0**	**98**	**100.0**
	Percentage of Total Businesses:			**88.4**		**4.4**		**7.3**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	28	100.0	28	100.0	0	0.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**28**	**100.0**	**28**	**100.0**	**0**	**.0**	**0**	**.0**
	Percentage of Total Farms:			**100.0**		**.0**		**.0**

Based on 2010 D&B information according to 2000 Census 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 overall performance. Despite the limited volume of lending, Citizens' performance was comparable to the proxies.

Community Development Test

The bank did not originate any community development loans in this MSA.

The institution funded one investments totaling $476,000 during the evaluation period. This was a bond used to fund affordable housing in Ottawa, Ohio. The bond supports an organization involved with the coalition on homelessness and housing in Ohio. The funds have been designated to rebuild and revitalize Ohio's low-income communities.

Of the bank's total community development investments, 19.2% were made in this assessment area, which outperforms the percentage of total deposits at 13.7% and also outperforms the percentage of branch offices at 11.1%. This is considered to be an adequate level of qualified community development investments, which is consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

Service Test

Retail services are consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

Citizens did not provide any community development services in this assessment area. Community development services are considered poor for this assessment area.

DESCRIPTION OF AKRON, OHIO MSA 10420

The Akron, Ohio MSA 10420 assessment area contains portions of Summit County, which is comprised of four middle-income and eight upper-income census tracts. Lending in this assessment area accounted for 1.4% (13 loans) of the bank's total lending. The low level of lending is attributed to the Citizens' limited presence and the high level of competition in the area. Several large institutions have lending operations in this area.

Citizens had 0.2% of the deposits in this assessment area as of June 30, 2011, which ranked the bank 20th of 23 institutions. FirstMerit Bank had the highest market share with 28.1% of the deposits. PNC and JP Morgan Chase had the second and third highest shares with 13.7% and 12.6%, respectively.

During this review period, Citizens originated three residential loans and ten small business loans, which represent 1.1% and 3.0%, respectively of total loans originated during this evaluation period. This assessment area had the least number of loans during this period.

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

The following table shows the demographics for this assessment area using data from the 2000 Census.

Combined Demographics Report

Assessment Area(s): Akron, Ohio MSA 10420 - 2010

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,733	11.4
Moderate-income	0	0.0	0	0.0	0	0.0	2,049	13.4
Middle-income	4	33.3	5,707	37.4	330	5.8	2,864	18.8
Upper-income	8	66.7	9,556	62.6	156	1.6	8,617	56.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**12**	**100.0**	**15,263**	**100.0**	**486**	**3.2**	**15,263**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	9,559	5,903	35.9	61.8	3,132	32.8	524	5.5
Upper-income	13,399	10,556	64.1	78.8	2,253	16.8	590	4.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**22,958**	**16,459**	**100.0**	**71.7**	**5,385**	**23.5**	**1,114**	**4.9**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	917	26.4	842	27.8	43	17.5	32	16.8
Upper-income	2,550	73.6	2,188	72.2	203	82.5	159	83.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**3,467**	**100.0**	**3,030**	**100.0**	**246**	**100.0**	**191**	**100.0**
	Percentage of Total Businesses:			**87.4**		**7.1**		**5.5**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	8	21.6	7	19.4	1	100.0	0	0.0
Upper-income	29	78.4	29	80.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**37**	**100.0**	**36**	**100.0**	**1**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**97.3**		**2.7**		**.0**

Based on 2010 D&B information according to 2000 Census Boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE AKRON OHIO MSA #10420

Lending Test

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

Community Development Test

The bank did not make any community development loans in this MSA.

The institution funded two investments totaling $1,142,000 during the evaluation period. This was a limited partnership in the Ohio Equity Fund for Housing in 2011 and low-income housing tax credits obtained in 2012. Total investments totaled $2 million and were spread among seven distinct areas.

Of the bank's total community development investments, 12.0% were made in this assessment area, which is well over the percentage of total deposits at 2.1% and also well above the percentage of branch offices at 3.7%. This is considered to be an excellent level of qualified community development investments, which is consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

Service Test

Retail services are consistent with the performance in the Sandusky MSA and Non-Metropolitan North Central area of Ohio.

Citizens did not provide any community development services in this assessment area. Community development services are considered poor for this assessment area.

APPENDIX A

LENDING TABLES

HMDA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group :Akron, Ohio MSA 10420 - 2011

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
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%
	Refinance							
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	1	33.3%	177	24.7%	2	66.7%	356	49.7%
Upper	2	66.7%	539	75.3%	1	33.3%	360	50.3%
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	3	100.0%	716	100.0%	3	100.0%	716	100.0%
	Home Improvement							
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%
	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%	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	1	33.3%	177	24.7%	2	66.7%	356	49.7%
Upper	2	66.7%	539	75.3%	1	33.3%	360	50.3%
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	3	100.0%	716	100.0%	3	100.0%	716	100.0%

*Information based on 2000 Census data

HMDA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group :Columbus, Ohio MSA 18140 - 2011

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	#	%	$(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	100.0%	143	100.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	100.0%	143	100.0%
Middle	1	100.0%	143	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	1	100.0%	143	100.0%	1	100.0%	143	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	1	33.3%	78	18.7%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	33.3%	78	18.7%
Middle	1	33.3%	78	18.7%	2	66.7%	339	81.3%
Upper	2	66.7%	339	81.3%	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	3	100.0%	417	100.0%	3	100.0%	417	100.0%
	Home Improvement							
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%
	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%	1	25.0%	78	13.9%
Moderate	0	0.0%	0	0.0%	1	25.0%	143	25.5%
Low/Moderate Total	0	0.0%	0	0.0%	2	50.0%	221	39.5%
Middle	2	50.0%	221	39.5%	2	50.0%	339	60.5%
Upper	2	50.0%	339	60.5%	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	4	100.0%	560	100.0%	4	100.0%	560	100.0%

*Information based on 2000 Census data

HMDA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group :Mansfield, Ohio MSA 31900 - 2011

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	#	%	$(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	50.0%	76	53.9%
Low/Moderate Total	0	0.0%	0	0.0%	1	50.0%	76	53.9%
Middle	2	100.0%	141	100.0%	1	50.0%	65	46.1%
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%	141	100.0%	2	100.0%	141	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	3	23.1%	199	15.9%
Low/Moderate Total	0	0.0%	0	0.0%	3	23.1%	199	15.9%
Middle	12	92.3%	1,177	94.1%	5	38.5%	301	24.1%
Upper	1	7.7%	74	5.9%	3	23.1%	356	28.5%
Unknown	0	0.0%	0	0.0%	2	15.4%	395	31.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	1,251	100.0%	13	100.0%	1,251	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	3	50.0%	35	51.5%
Low/Moderate Total	0	0.0%	0	0.0%	3	50.0%	35	51.5%
Middle	6	100.0%	68	100.0%	1	16.7%	3	4.4%
Upper	0	0.0%	0	0.0%	2	33.3%	30	44.1%
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	6	100.0%	68	100.0%	6	100.0%	68	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	1	100.0%	113	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%	1	100.0%	113	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	113	100.0%	1	100.0%	113	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	7	31.8%	310	19.7%
Low/Moderate Total	0	0.0%	0	0.0%	7	31.8%	310	19.7%
Middle	21	95.5%	1,499	95.3%	7	31.8%	369	23.5%
Upper	1	4.5%	74	4.7%	5	22.7%	386	24.5%
Unknown	0	0.0%	0	0.0%	3	13.6%	508	32.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	22	100.0%	1,573	100.0%	22	100.0%	1,573	100.0%

*Information based on 2000 Census data

HMDA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group :Non Metro Area North Central Ohio - 2011

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	1	20.0%	94	11.1%
Moderate	0	0.0%	0	0.0%	1	20.0%	58	6.8%
Low/Moderate Total	0	0.0%	0	0.0%	2	40.0%	152	17.9%
Middle	2	40.0%	198	23.3%	0	0.0%	0	0.0%
Upper	3	60.0%	651	76.7%	2	40.0%	557	65.6%
Unknown	0	0.0%	0	0.0%	1	20.0%	140	16.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	849	100.0%	5	100.0%	849	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	1	7.1%	52	2.0%
Moderate	0	0.0%	0	0.0%	3	21.4%	445	17.0%
Low/Moderate Total	0	0.0%	0	0.0%	4	28.6%	497	19.0%
Middle	12	85.7%	1,431	54.7%	2	14.3%	193	7.4%
Upper	2	14.3%	1,184	45.3%	7	50.0%	1,848	70.7%
Unknown	0	0.0%	0	0.0%	1	7.1%	77	2.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	2,615	100.0%	14	100.0%	2,615	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	2	22.2%	24	16.7%
Moderate	0	0.0%	0	0.0%	2	22.2%	11	7.6%
Low/Moderate Total	0	0.0%	0	0.0%	4	44.4%	35	24.3%
Middle	5	55.6%	56	38.9%	1	11.1%	5	3.5%
Upper	4	44.4%	88	61.1%	3	33.3%	74	51.4%
Unknown	0	0.0%	0	0.0%	1	11.1%	30	20.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	144	100.0%	9	100.0%	144	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%	4	14.3%	170	4.7%
Moderate	0	0.0%	0	0.0%	6	21.4%	514	14.2%
Low/Moderate Total	0	0.0%	0	0.0%	10	35.7%	684	19.0%
Middle	19	67.9%	1,685	46.7%	3	10.7%	198	5.5%
Upper	9	32.1%	1,923	53.3%	12	42.9%	2,479	68.7%
Unknown	0	0.0%	0	0.0%	3	10.7%	247	6.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	3,608	100.0%	28	100.0%	3,608	100.0%

*Information based on 2000 Census data

HMDA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group :Non Metro West Central Ohio - 2011

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	10.0%	54	8.4%	8	80.0%	506	78.9%
Low/Moderate Total	1	10.0%	54	8.4%	8	80.0%	506	78.9%
Middle	8	80.0%	540	84.2%	1	10.0%	95	14.8%
Upper	1	10.0%	47	7.3%	1	10.0%	40	6.2%
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	10	100.0%	641	100.0%	10	100.0%	641	100.0%
	Refinance							
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	2	66.7%	162	31.0%	1	33.3%	83	15.9%
Upper	1	33.3%	360	69.0%	2	66.7%	439	84.1%
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	3	100.0%	522	100.0%	3	100.0%	522	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	2	7.1%	1	25.0%	1	3.6%
Low/Moderate Total	1	25.0%	2	7.1%	1	25.0%	1	3.6%
Middle	2	50.0%	16	57.1%	2	50.0%	17	60.7%
Upper	1	25.0%	10	35.7%	1	25.0%	10	35.7%
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%	28	100.0%	4	100.0%	28	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%	0	0.0%	0	0.0%
Moderate	2	11.8%	56	4.7%	9	52.9%	507	42.6%
Low/Moderate Total	2	11.8%	56	4.7%	9	52.9%	507	42.6%
Middle	12	70.6%	718	60.3%	4	23.5%	195	16.4%
Upper	3	17.6%	417	35.0%	4	23.5%	489	41.1%
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	17	100.0%	1,191	100.0%	17	100.0%	1,191	100.0%

*Information based on 2000 Census data

HMDA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group :Sandusky, Ohio MSA 41780 - 2011

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	1	4.8%	46	2.2%
Moderate	4	19.0%	204	9.8%	6	28.6%	422	20.3%
Low/Moderate Total	4	19.0%	204	9.8%	7	33.3%	468	22.6%
Middle	11	52.4%	905	43.6%	3	14.3%	255	12.3%
Upper	6	28.6%	965	46.5%	10	47.6%	1,301	62.7%
Unknown	0	0.0%	0	0.0%	1	4.8%	50	2.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	2,074	100.0%	21	100.0%	2,074	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	6	11.5%	428	4.7%
Moderate	6	11.5%	565	6.2%	6	11.5%	579	6.3%
Low/Moderate Total	6	11.5%	565	6.2%	12	23.1%	1,007	11.0%
Middle	31	59.6%	4,125	45.2%	10	19.2%	942	10.3%
Upper	15	28.8%	4,438	48.6%	30	57.7%	7,179	78.6%
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	52	100.0%	9,128	100.0%	52	100.0%	9,128	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	5	19.2%	21	5.6%
Moderate	3	11.5%	25	6.6%	5	19.2%	45	11.9%
Low/Moderate Total	3	11.5%	25	6.6%	10	38.5%	66	17.5%
Middle	20	76.9%	305	80.7%	6	23.1%	165	43.7%
Upper	3	11.5%	48	12.7%	9	34.6%	145	38.4%
Unknown	0	0.0%	0	0.0%	1	3.8%	2	0.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	378	100.0%	26	100.0%	378	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%	12	12.1%	495	4.3%
Moderate	13	13.1%	794	6.9%	17	17.2%	1,046	9.0%
Low/Moderate Total	13	13.1%	794	6.9%	29	29.3%	1,541	13.3%
Middle	62	62.6%	5,335	46.1%	19	19.2%	1,362	11.8%
Upper	24	24.2%	5,451	47.1%	49	49.5%	8,625	74.5%
Unknown	0	0.0%	0	0.0%	2	2.0%	52	0.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	99	100.0%	11,580	100.0%	99	100.0%	11,580	100.0%

*Information based on 2000 Census data

HMDA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group :Toledo, Ohio MSA 45780 - 2011

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
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	2	100.0%	687	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	100.0%	687	100.0%
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%	687	100.0%	2	100.0%	687	100.0%
	Refinance							
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	4	100.0%	798	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	4	100.0%	798	100.0%
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	4	100.0%	798	100.0%	4	100.0%	798	100.0%
	Home Improvement							
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	1	100.0%	6	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	6	100.0%
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	1	100.0%	6	100.0%	1	100.0%	6	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%	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	7	100.0%	1,491	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	7	100.0%	1,491	100.0%
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	7	100.0%	1,491	100.0%	7	100.0%	1,491	100.0%

*Information based on 2000 Census data

CRA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group: Columbus, Ohio MSA 18140 - 2011

	SMALL BUSINESS				SMALL FARM			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
				By Tract Income				
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	8	53.3%	1	34.4%	0	0.0%	0	0.0%
Upper	7	46.7%	1	65.6%	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	15	100.0%	2	100.0%	0	0.0%	0	0.0%
				By Revenue				
Total $1 Million or Less	8	53.3%	2	80.0%	0	0.0%	0	0.0%
Over $1 Million	6	40.0%	0	18.5%	0	0.0%	0	0.0%
Not Known	1	6.7%	0	1.5%	0	0.0%	0	0.0%
Total	15	100.0%	2	100.0%	0	0.0%	0	0.0%
				By Loan Size				
$100,000 or less	15	100.0%	2	100.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	15	100.0%	2	100.0%	0	0.0%	0	0.0%
				By Loan Size and Revenue $1 Million or Less				
$100,000 or less	8	100.0%	2	100.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	8	100.0%	2	100.0%	0	0.0%	0	0.0%

*Information based on 2000 Census data

CRA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group: Akron, Ohio MSA 10420 - 2011

	SMALL BUSINESS				SMALL FARM			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
				By Tract Income				
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	6	100.0%	2	100.0%	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	6	100.0%	2	100.0%	0	0.0%	0	0.0%
				By Revenue				
Total $1 Million or Less	5	83.3%	1	75.3%	0	0.0%	0	0.0%
Over $1 Million	1	16.7%	0	24.7%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	2	100.0%	0	0.0%	0	0.0%
				By Loan Size				
$100,000 or less	6	100.0%	2	100.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	6	100.0%	2	100.0%	0	0.0%	0	0.0%
				By Loan Size and Revenue $1 Million or Less				
$100,000 or less	5	100.0%	1	100.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	5	100.0%	1	100.0%	0	0.0%	0	0.0%

*Information based on 2000 Census data

CRA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group: Mansfield, Ohio MSA 31900 - 2011

	SMALL BUSINESS				SMALL FARM			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
				By Tract Income				
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	10.0%	0	3.1%	0	0.0%	0	0.0%
Low/Moderate Total	3	10.0%	0	3.1%	0	0.0%	0	0.0%
Middle	25	83.3%	2	94.6%	13	92.9%	1	95.5%
Upper	2	6.7%	0	2.3%	1	7.1%	0	4.5%
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	30	100.0%	3	100.0%	14	100.0%	1	100.0%
				By Revenue				
Total $1 Million or Less	26	86.7%	2	82.5%	12	85.7%	1	80.3%
Over $1 Million	4	13.3%	0	17.5%	2	14.3%	0	19.7%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	3	100.0%	14	100.0%	1	100.0%
				By Loan Size				
$100,000 or less	30	100.0%	3	100.0%	14	100.0%	1	100.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	30	100.0%	3	100.0%	14	100.0%	1	100.0%
				By Loan Size and Revenue $1 Million or Less				
$100,000 or less	26	100.0%	2	100.0%	12	100.0%	1	100.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	26	100.0%	2	100.0%	12	100.0%	1	100.0%

*Information based on 2000 Census data

CRA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group: Non Metro Area North Central Ohio - 2011

	SMALL BUSINESS				SMALL FARM			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
				By Tract Income				
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	39	62.9%	5	59.5%	21	95.5%	3	98.4%
Upper	23	37.1%	4	40.5%	1	4.5%	0	1.6%
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	62	100.0%	9	100.0%	22	100.0%	3	100.0%
				By Revenue				
Total $1 Million or Less	39	62.9%	2	27.4%	22	100.0%	3	100.0%
Over $1 Million	22	35.5%	6	70.3%	0	0.0%	0	0.0%
Not Known	1	1.6%	0	2.3%	0	0.0%	0	0.0%
Total	62	100.0%	9	100.0%	22	100.0%	3	100.0%
				By Loan Size				
$100,000 or less	62	100.0%	9	100.0%	22	100.0%	3	100.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	62	100.0%	9	100.0%	22	100.0%	3	100.0%
				By Loan Size and Revenue $1 Million or Less				
$100,000 or less	39	100.0%	2	100.0%	22	100.0%	3	100.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	39	100.0%	2	100.0%	22	100.0%	3	100.0%

*Information based on 2000 Census data

CRA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group: Non Metro West Central Ohio - 2011

	SMALL BUSINESS				SMALL FARM			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
				By Tract Income				
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	12.0%	2	40.4%	1	3.6%	0	12.7%
Low/Moderate Total	3	12.0%	2	40.4%	1	3.6%	0	12.7%
Middle	21	84.0%	3	59.0%	5	17.9%	1	24.4%
Upper	1	4.0%	0	0.5%	22	78.6%	2	63.0%
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	25	100.0%	6	100.0%	28	100.0%	3	100.0%
				By Revenue				
Total $1 Million or Less	10	40.0%	0	6.6%	21	75.0%	2	52.5%
Over $1 Million	13	52.0%	5	91.6%	6	21.4%	1	38.0%
Not Known	2	8.0%	0	1.8%	1	3.6%	0	9.5%
Total	25	100.0%	6	100.0%	28	100.0%	3	100.0%
				By Loan Size				
$100,000 or less	25	100.0%	6	100.0%	28	100.0%	3	100.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	25	100.0%	6	100.0%	28	100.0%	3	100.0%
				By Loan Size and Revenue $1 Million or Less				
$100,000 or less	10	100.0%	0	100.0%	21	100.0%	2	100.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	10	100.0%	0	100.0%	21	100.0%	2	100.0%

*Information based on 2000 Census data

CRA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group: Sandusky, Ohio MSA 41780 - 2011

	SMALL BUSINESS				SMALL FARM			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
				By Tract Income				
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	21	26.6%	2	15.1%	0	0.0%	0	0.0%
Low/Moderate Total	21	26.6%	2	15.1%	0	0.0%	0	0.0%
Middle	43	54.4%	7	67.6%	6	60.0%	0	46.0%
Upper	15	19.0%	2	17.3%	4	40.0%	0	54.0%
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	79	100.0%	11	100.0%	10	100.0%	1	100.0%
				By Revenue				
Total $1 Million or Less	44	55.7%	4	40.4%	8	80.0%	0	60.0%
Over $1 Million	32	40.5%	6	57.9%	1	10.0%	0	12.0%
Not Known	3	3.8%	0	1.7%	1	10.0%	0	28.0%
Total	79	100.0%	11	100.0%	10	100.0%	1	100.0%
				By Loan Size				
$100,000 or less	79	100.0%	11	100.0%	10	100.0%	0	100.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	79	100.0%	11	100.0%	10	100.0%	0	100.0%
				By Loan Size and Revenue $1 Million or Less				
$100,000 or less	44	100.0%	4	100.0%	8	100.0%	0	100.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	44	100.0%	4	100.0%	8	100.0%	0	100.0%

*Information based on 2000 Census data

CRA Loan Distribution Table

Exam: Citizens Banking Co - Sandusky

Assessment Area/Group: Toledo, Ohio MSA 45780 - 2011

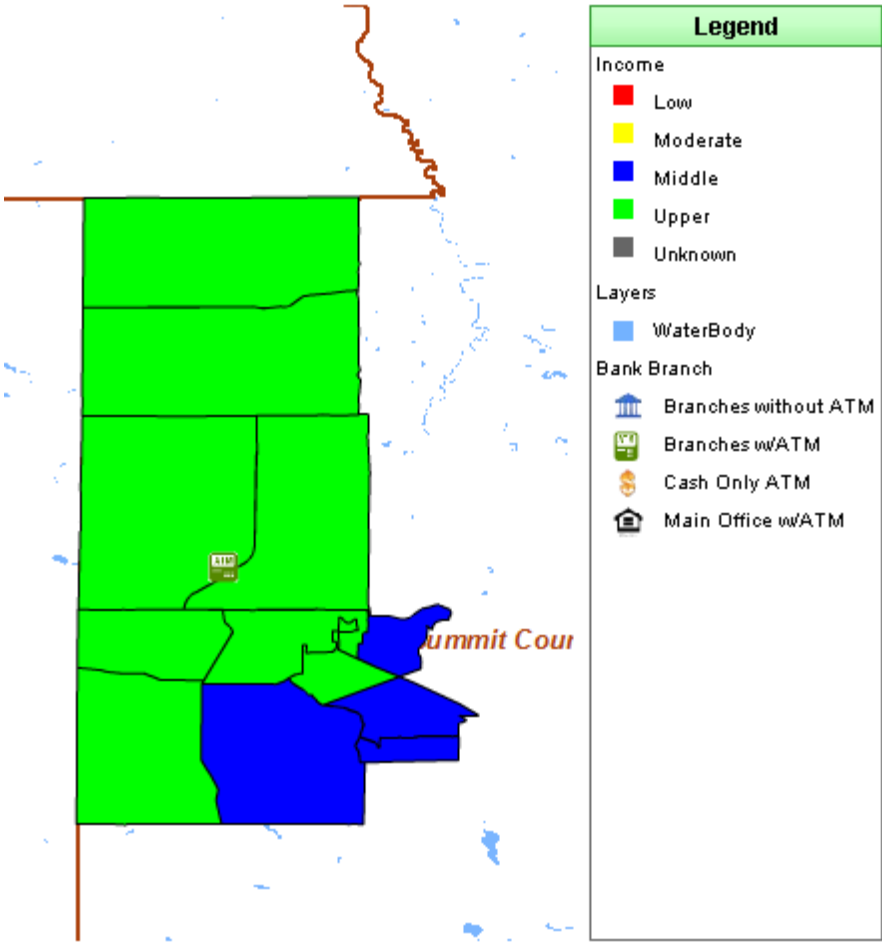
	SMALL BUSINESS				SMALL FARM			
Income Categories	**#**	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
				By Tract Income				
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	11	100.0%	5	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	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	11	100.0%	5	100.0%	0	0.0%	0	0.0%
				By Revenue				
Total $1 Million or Less	3	27.3%	1	17.2%	0	0.0%	0	0.0%
Over $1 Million	8	72.7%	4	82.8%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	5	100.0%	0	0.0%	0	0.0%
				By Loan Size				
$100,000 or less	11	100.0%	5	100.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	11	100.0%	5	100.0%	0	0.0%	0	0.0%
				By Loan Size and Revenue $1 Million or Less				
$100,000 or less	3	100.0%	1	100.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	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%
Total	3	100.0%	1	100.0%	0	0.0%	0	0.0%

*Information based on 2000 Census data

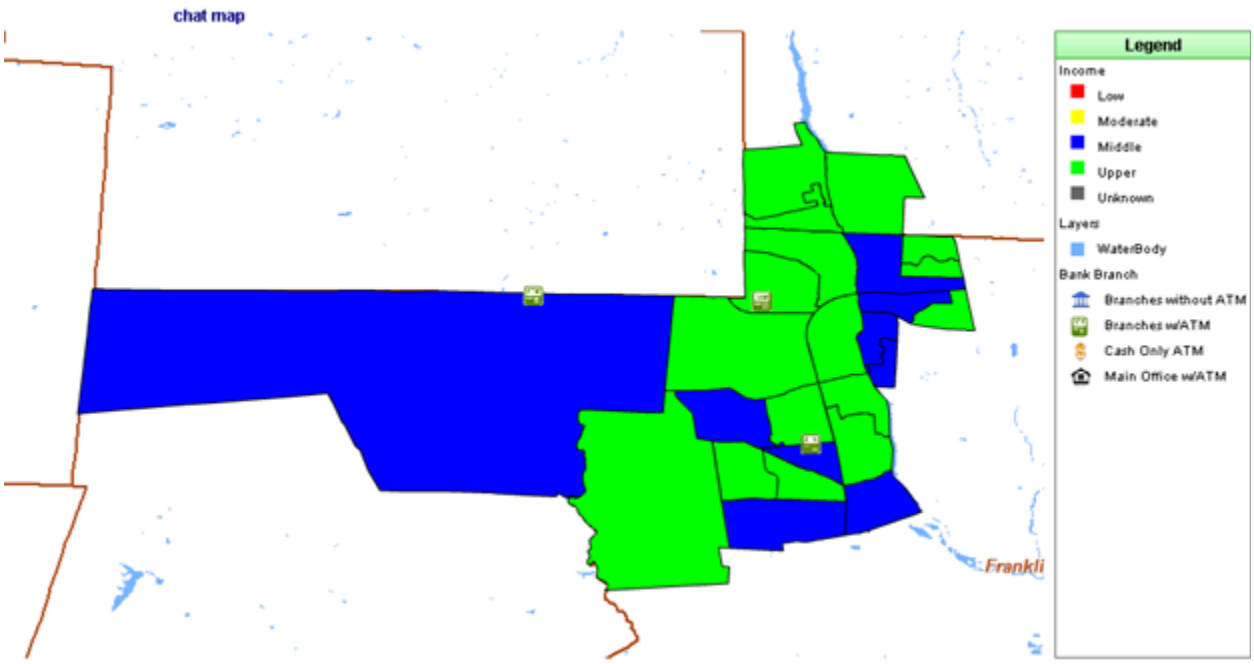
APPENDIX B

ASSESSMENT AREA MAPS

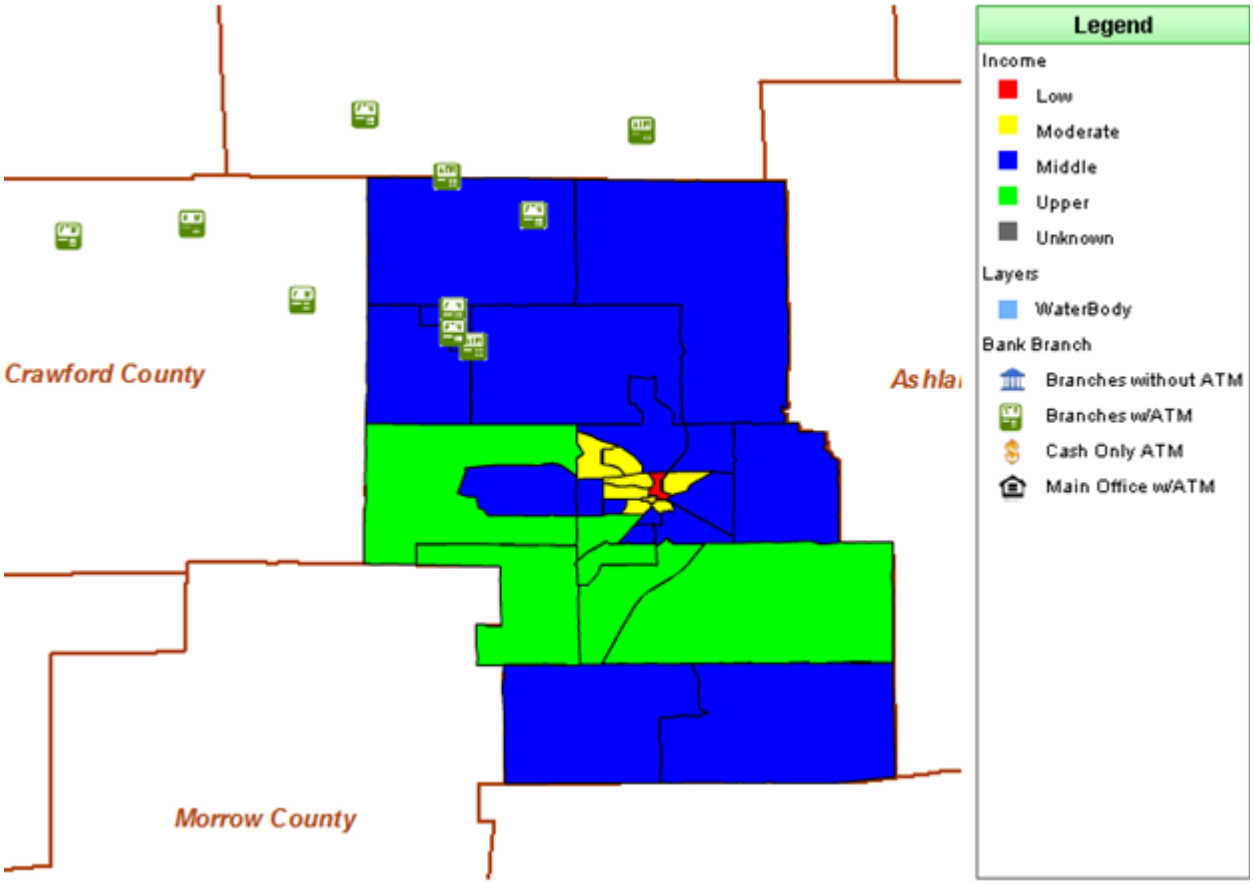
Assessment Area: Akron MSA



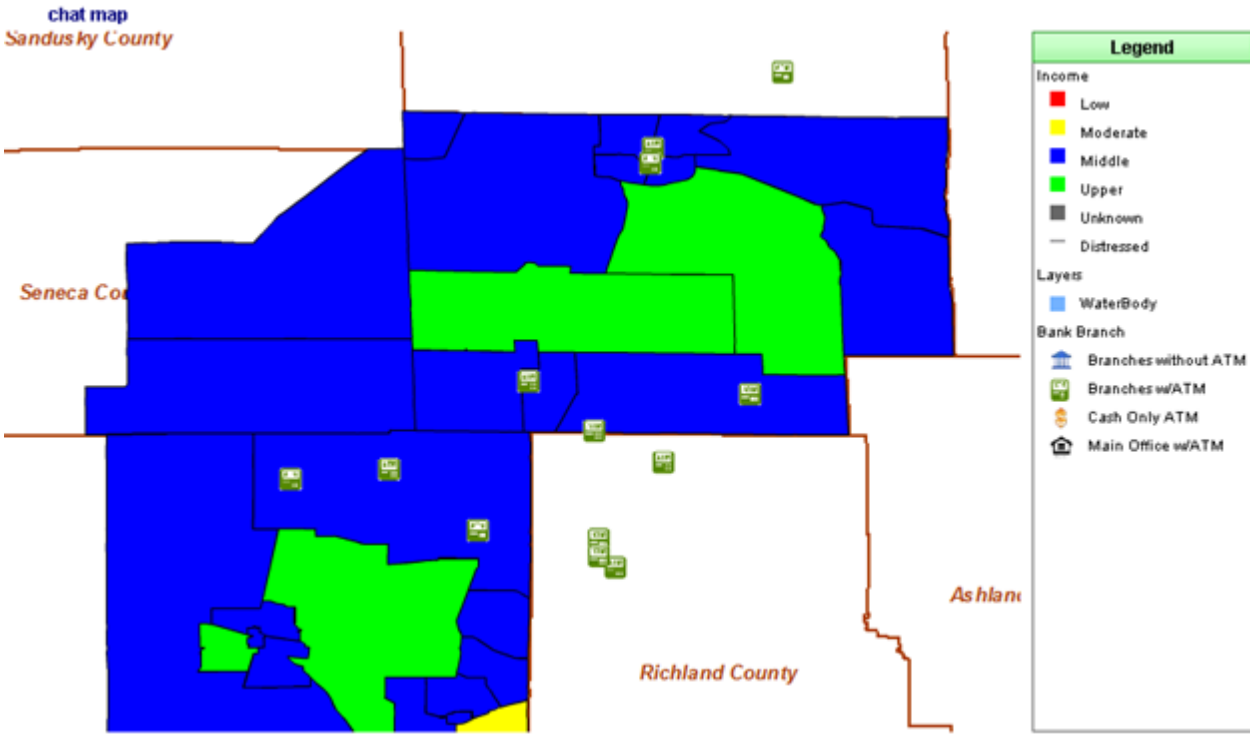
Assessment Area: Columbus MSA



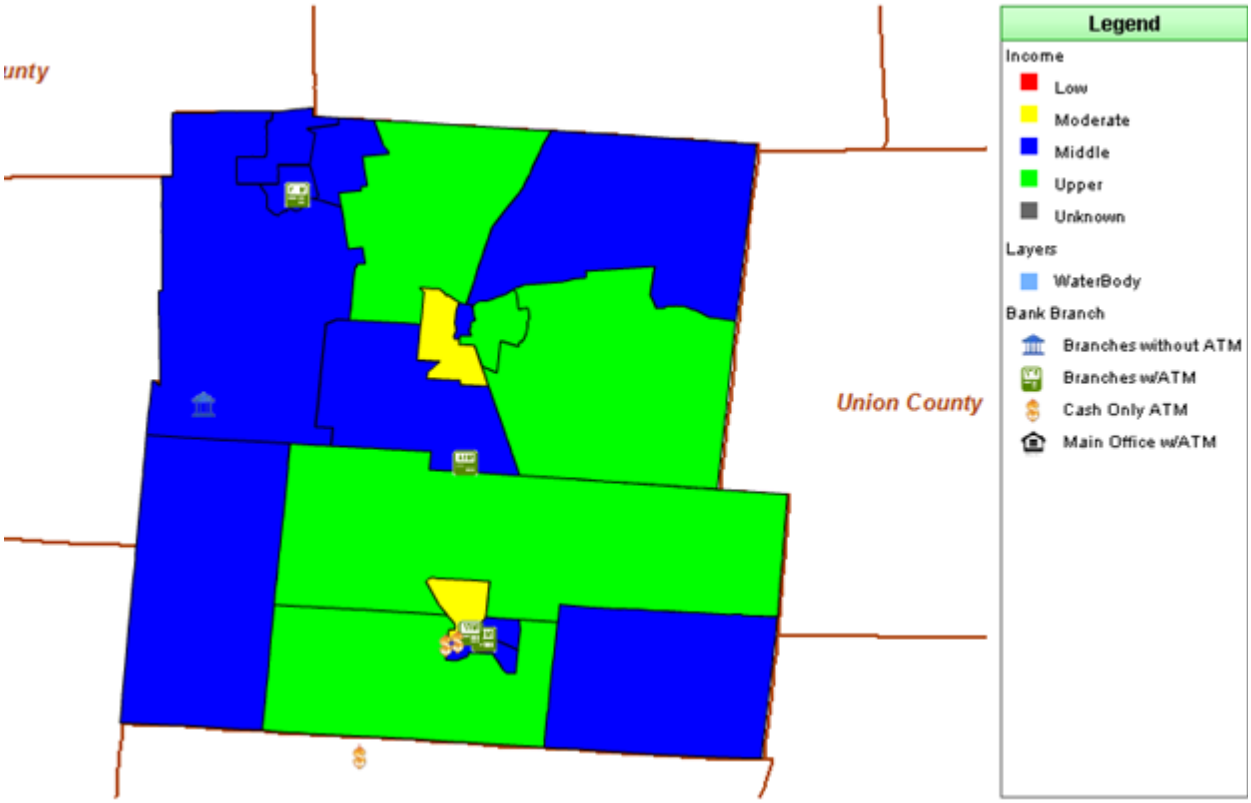
Assessment Area: Mansfield MSA



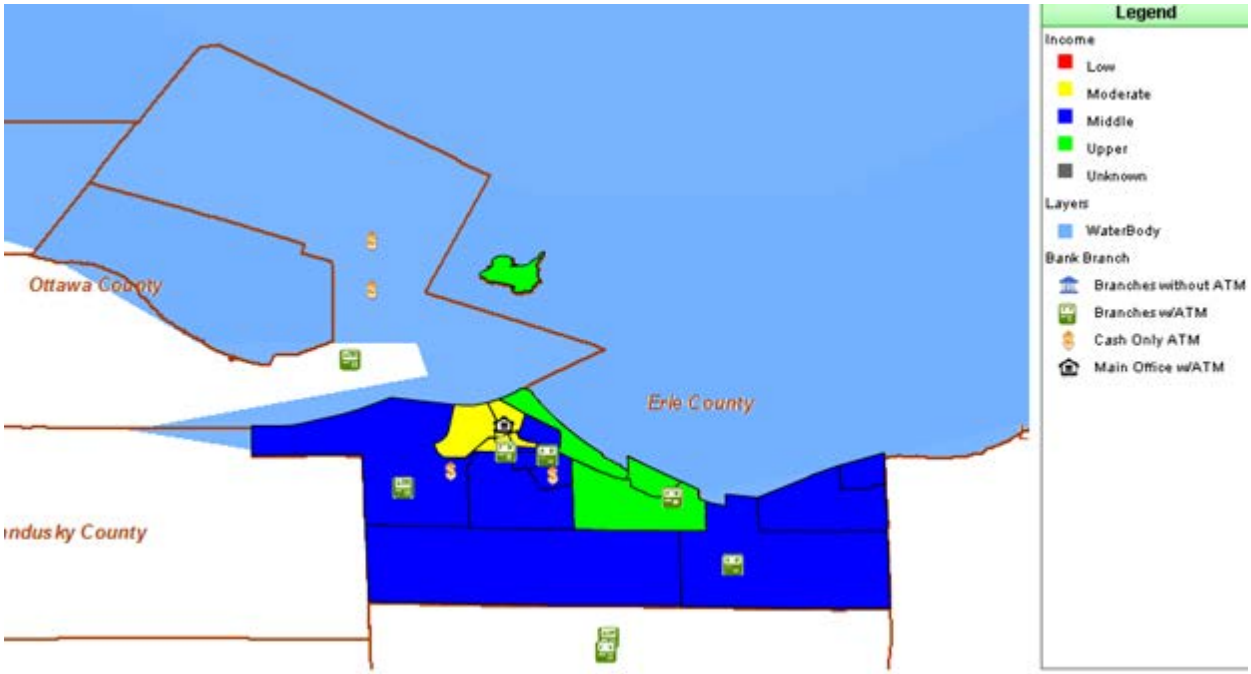
Assessment Area: Non Metro Area North Central Ohio



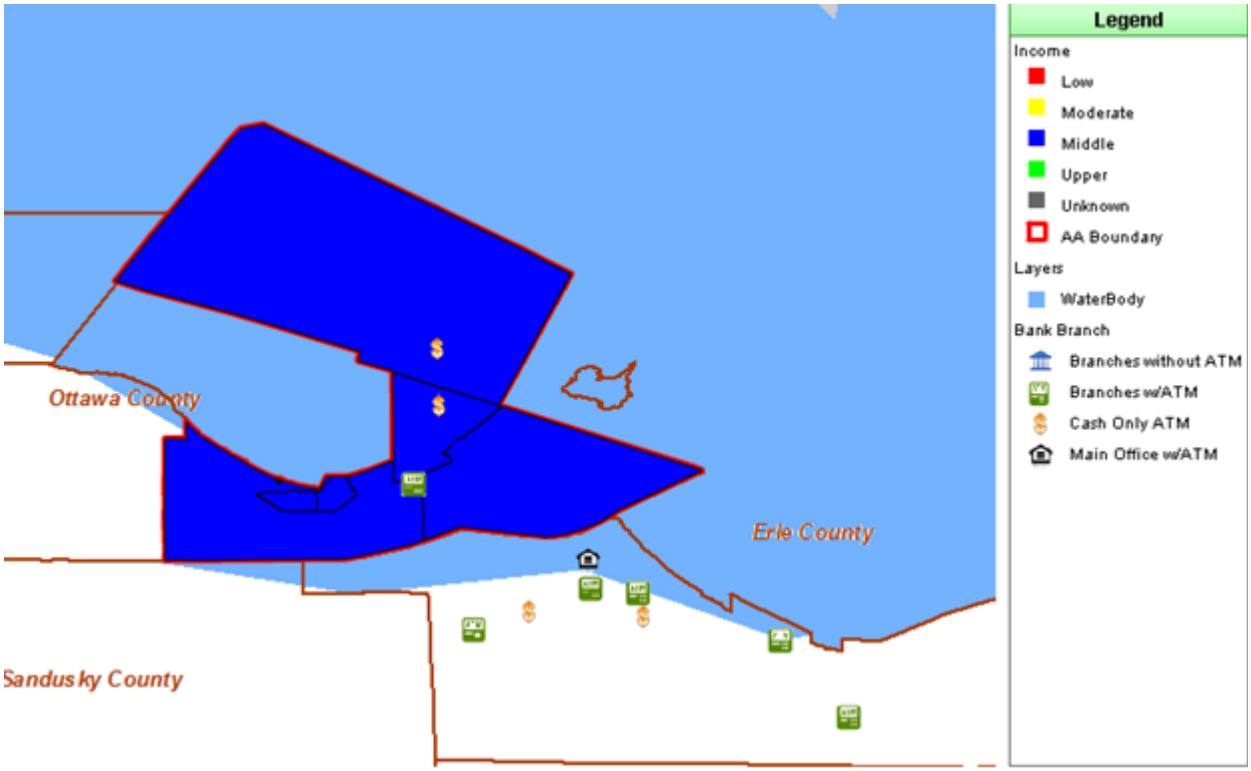
Assessment Area: Non Metro Area West Central Ohio



Assessment Area: Sandusky MSA



Assessment Area: Toledo MSA



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.