

PUBLIC DISCLOSURE

March 23, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Civista Bank
RSSD # 542528

100 East Water Street
Sandusky, Ohio 44410

Federal Reserve Bank of Cleveland

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

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

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INSTITUTION'S CRA RATING: This institution is rated: "Needs to Improve"
The Lending Test is rated: "Satisfactory"
The Community Development Test is rated: "Satisfactory"

The major factors and criteria contributing to this rating include:

- A reasonable loan-to-deposit ratio, given the bank's size, financial condition, and assessment area credit needs;
- A majority of loans and other lending-related activities are in the assessment area;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area;
- A reasonable penetration among individuals of different income levels (including low- and moderate-income individuals) and businesses of different sizes;
- No CRA-related complaints about the institution's performance in meeting the assessment area credit needs; and,
- The bank's community development performance demonstrates an adequate responsiveness to the community development needs of its assessment area, considering the bank's capacity and the need and availability of such opportunities in the bank's assessment area.

A substantive violation of Section 5(a) of the Federal Trade Commission Act involving unfair and deceptive late fee practices was identified in the concurrent consumer compliance examination as a result of inadequate compliance risk management practices. Civista's management is committed to correcting the violation. The violation caused Civista's CRA rating to be adjusted downward from "Satisfactory" to "Needs to Improve."

The bank was evaluated as an intermediate small bank and was rated "Satisfactory" at the previous CRA evaluation dated February 4, 2013.

SCOPE OF EXAMINATION

Civista Bank's (Civista) Community Reinvestment Act (CRA) performance was evaluated using the interagency intermediate small bank examination procedures under Regulation BB.

Civista's CRA performance was evaluated based on lending data for the period of January 1, 2012 through September 30, 2014. The loan products evaluated included small business loans, small farm loans, and residential real estate loans (i.e., loans reported under the Home Mortgage Disclosure Act). Small business loans are comprised of loans secured and not secured by real estate. Small farm loans include loans secured by farmland and loans to finance agricultural production. Residential real estate loans are comprised of home purchase, refinance loans, and home improvement.

Community development activities for the period between February 4, 2013 and March 23, 2015 were reviewed as part of this evaluation; specifically, community development loans, investments, and services occurring since the previous examination.

In 2012 and 2013, Civista's delineated CRA footprint was comprised of the following seven assessment areas:

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

Non-metropolitan North Central Ohio

- Crawford County
- Huron County
- Eastern portion of Seneca County

Non-metropolitan West Central Ohio

- Champaign County
- Logan County

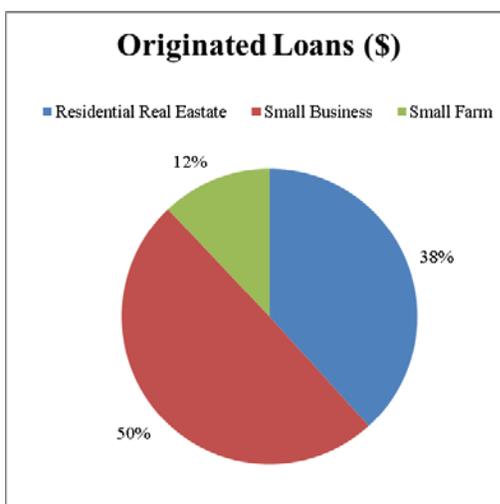
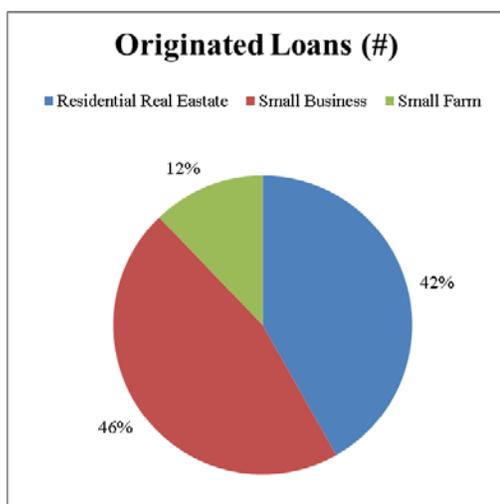
Due to changes made by the Office of Management and Budget (OMB) in 2013, Erie County was no longer part of the Sandusky, Ohio MSA and Ottawa County was no longer part of the Toledo, Ohio MSA. For the purposes of the 2014 lending performance analysis, the Non-metropolitan North Central Ohio assessment area included:

- Crawford County
- Erie County
- Huron County
- Eastern portion of Ottawa County
- Eastern portion of Seneca County

Civista’s assessment areas in the Sandusky, Ohio MSA and Non-metropolitan North Central Ohio are given the greatest weight in this evaluation, as they contain the largest percentage of branches and originated the largest number of loans by volume. Civista’s main office is located in the Sandusky, Ohio MSA and of the 24 offices located throughout Civista’s assessment areas, 14 (51.9%) are located within these two assessment areas.

The following table and charts illustrate the volume and distribution of loans originated within Civista’s assessment areas during the evaluation period:

| Loan Type | Number of Loans | Dollar Amount of Loans (000s) |
|-------------------------|-----------------|-------------------------------|
| Residential Real Estate | 960 | 237,007 |
| Small Business | 968 | 282,919 |
| Small Farm | 265 | 71,803 |
| Total | 2,193 | 591,729 |



Based on loan volume and Civista's stated business strategy, greatest consideration was given to small business lending and residential real estate lending equally in this analysis, followed by small farm lending. Further, based on the characteristics of the assessment areas and due particularly to the limited number of low-income census tracts throughout the assessment areas, borrower distribution was given greater consideration than geographic distribution.

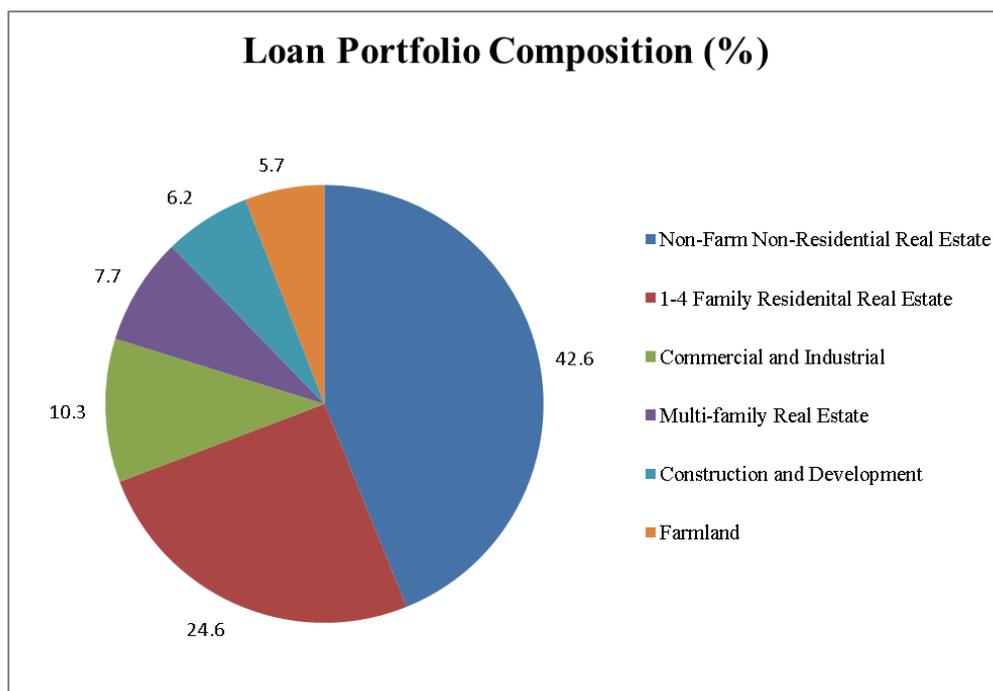
Five community contact interviews were conducted to provide perspective on the credit needs of the assessment area in which Civista operates. Details from these interviews are presented within each of the respective assessment areas of this evaluation.

DESCRIPTION OF INSTITUTION

Located in Sandusky, Ohio, Civista is the banking subsidiary of First Citizens Bancorp. Prior to 2014, the bank operated under Citizens Banking Company and Champaign Bank, but rebranded itself in January 2015. According to the September 30, 2014 Uniform Bank Performance Report (UBPR), Civista had total assets of \$1.178 billion, a 5.4% increase in total assets since the previous evaluation.

Civista is a full-service retail bank offering business and consumer deposit accounts and commercial, agricultural, residential mortgage, and consumer loans. As of September 30, 2014, Civista had \$873 million in net loans and leases, which is approximately a \$91 million (11.6%) increase over the previous examination date. Loans comprised 74.1% of the bank’s assets. The following charts display the bank’s loan portfolio composition as of September 30, 2014:

| Loan Type | Percent of Total Loans |
|--------------------------------------|------------------------|
| Non-Farm Non-Residential Real Estate | 42.6 |
| 1-4 Family Residential Real Estate | 24.6 |
| Commercial and Industrial | 10.3 |
| Multi-family Real Estate | 7.7 |
| Construction and Development | 6.2 |
| Farmland | 5.7 |
| All Other Loans | 2.9 |
| Total (gross) | 100.0 |



Civista’s investment portfolio as of September 30, 2014 was \$205.3 million, which represents 17.2% of total assets. The following table displays the bank’s investment portfolio composition as of September 30, 2014:

| Investment Type | Percent of Total Investments |
|------------------------------|------------------------------|
| U.S. Treasuries and Agencies | 47.7% |
| Municipal Securities | 42.5% |
| All Other Investments | 9.8% |
| Total (gross) | 100.0% |

Civista’s delineated CRA footprint consists of 146 census tracts, of which 24 (16.4%) are designated as moderate-, 67 (45.9%) are middle-, and 54 (37.0%) are upper-income tracts. There are no low-income census tracts in Civista’s assessment areas. There is also one tract with no income designation that is primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

Civista has one main office and 23 branch offices. The main branch is located at 100 East Water Street in Sandusky, Ohio. In addition to the main office, Civista has two other branches in Sandusky and three additional offices, including Berlin Heights, Castalia, and Huron, which are located in Erie County. In Ottawa County, one branch is located in Port Clinton. In the Non-metropolitan North Central assessment area, five branches are located in Huron County, including two branches in Norwalk, as well as branches in Greenwich, Plymouth, and Willard. One additional branch is located in New Washington (Crawford County). In the Non-metropolitan West Central assessment area, three offices are in Urbana (Champaign County) and two offices are in Logan County. One office is in Akron (Summit County) and two offices are in the Columbus MSA, which include Plain City (Madison County) and Dublin (Franklin County). Two offices are in Shelby and one office is in Shiloh, which are all in Richland County (Mansfield MSA). Civista also has seven standalone cash-dispensing ATMs.

There are no low-income census tracts in the assessment area. The main office and two additional offices in the Non-metropolitan West Central assessment area are located in moderate-income census tracts (12.5%). Of the remaining offices, 13 (54.2%) are located in middle-income tracts and eight (33.3%) in upper-income tracts.

Since the previous evaluation, Civista closed four branch offices with full-service ATMs located in Hillard (Columbus MSA), Shelby (Mansfield MSA), Chatfield (Non-metropolitan North Central), and Tiro (Non-metropolitan North Central). One cash-only ATM, located in Crestline (Mansfield MSA), was also closed. The office in Hillard and the ATM in Crestline were located in an upper-income census tract and the other three offices were located in middle-income census tracts.

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Civista's overall performance under the lending test is considered satisfactory. Lending performance in all assessment areas was considered reasonable, with the exception of the Akron MSA, where performance was considered poor.

Loan-to-Deposit Ratio

A financial institution's loan-to-deposit ratio (LTD) compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution's lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing by the total number of quarters. The following table illustrates Civista's quarterly LTD ratios with the average LTD for the same period as compared to three local peer banks. The custom peer LTD is the combined aggregate LTD for all three peer banks.

| Civista Bank Loan-to-Deposit Ratios | | | | | |
|--|---------------------|------------------|----------------------|----------------------------|--------------------|
| As of Date | CIVISTA BANK | SUTTON BK | OLD FT BKG CO | CROGHAN COLONIAL BK | CUSTOM PEER |
| September 30, 2014 | 87.9 | 71.4 | 67.0 | 72.7 | 70.4 |
| June 30, 2014 | 86.2 | 76.1 | 68.2 | 71.7 | 72.0 |
| March 31, 2014 | 79.9 | 75.3 | 67.3 | 66.8 | 69.8 |
| December 31, 2013 | 86.7 | 81.3 | 67.9 | 68.3 | 72.5 |
| September 30, 2013 | 84.6 | 76.9 | 65.1 | 61.9 | 68.0 |
| June 30, 2013 | 83.4 | 74.7 | 65.0 | 61.1 | 66.9 |
| March 31, 2013 | 80.7 | 72.0 | 63.8 | 58.7 | 64.8 |
| Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation | 84.2 | 75.4 | 66.3 | 65.9 | 69.2 |

Civista's average LTD ratio was 84.2% over the past seven quarters, which is higher than the custom peer lenders average ratio of 69.2%. Civista's LTD ratio steadily increased during the review period, with the exception of the first quarter of 2014.

Considering the bank's lending-related activity, size, financial condition, and assessment area credit needs, Civista's LTD ratio is considered reasonable.

Lending in the Assessment Area

Civista's residential real estate (HMDA related-lending), small business, and small farm lending was analyzed to determine the volume of lending inside and outside the bank's assessment area. Of the total loans for the period, 75.5% by volume and 56.5% by dollar amount were made inside the assessment area.

The following table shows the distribution of loans made inside and outside the bank's assessment area:

| Lending Inside and Outside the Assessment Area | | | | | | | | | | |
|---|---------------|-------------|-----------------|-------------|----------------|-------------|-----------------|-------------|--------------|-----------------|
| Loan Type - Description | Inside | | | | Outside | | | | Total | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % | # | \$(000s) |
| HMDA related loans | | | | | | | | | | |
| Home Purchase - Conventional | 212 | 71.1 | 32,799 | 59.8 | 86 | 28.9 | 22,057 | 40.2 | 298 | 54,856 |
| Home Purchase - FHA | 5 | 71.4 | 460 | 63.2 | 2 | 28.6 | 268 | 36.8 | 7 | 728 |
| Home Improvement | 114 | 94.2 | 4,551 | 71.8 | 7 | 5.8 | 1791 | 28.2 | 121 | 6,342 |
| Multi-Family Housing | 13 | 22.8 | 13,674 | 14.5 | 44 | 77.2 | 80676 | 85.5 | 57 | 94,350 |
| Refinancing | 400 | 83.9 | 64,058 | 79.3 | 77 | 16.1 | 16,673 | 20.7 | 477 | 80,731 |
| Total HMDA related | 744 | 77.5 | 115,542 | 48.8 | 216 | 22.5 | 121,465 | 51.2 | 960 | 237,007 |
| Total Small Bus. related | 675 | 69.7 | 150,539 | 53.2 | 293 | 30.3 | 132,380 | 46.8 | 968 | 282,919 |
| Total Small Farm related | 237 | 89.4 | 68,169 | 94.9 | 28 | 10.6 | 3,634 | 5.1 | 265 | 71,803 |
| TOTAL LOANS | 1,656 | 75.5 | 334,250 | 56.5 | 537 | 24.5 | 257,479 | 43.5 | 2,193 | 591,729 |

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

Geographic Distribution of Lending

Civista's geographic distribution of lending is reasonable. While the bank had lending gaps in the Akron and Mansfield MSAs, sufficient lending penetration levels were noted in the remaining areas. In its primary assessment areas, the dispersion of loans among different tract income categories was reasonable. The respective analyses are included within each assessment area evaluation later in this report.

Borrower Distribution of Lending

Civista's lending to borrowers of different income levels and businesses of different revenue sizes is reasonable, although lower performance levels were noted in the Akron and Toledo MSAs. The respective analyses can be found within each assessment area discussion later in this report.

Response to Consumer Complaints

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

Community Development Test

Civista's overall performance under the community development test is considered satisfactory. Civista demonstrated an adequate responsiveness to the needs of its assessment areas through community development loans, qualified investments, and services, considering the bank's capacity and the need and availability of opportunities in its assessment areas.

Community Development Loans

During the review period, Civista originated seven community development loans totaling \$6.2 million within its designated assessment area. Of the seven loans, three were for affordable housing, three were for economic development, and one loan supported community services.

There was no community development lending activity in the Akron, Mansfield, or Toledo MSAs during the evaluation. However, Civista has a limited market share in these areas and while there are three branches in the Mansfield MSA, there is only one branch in the Akron MSA and one branch in the Toledo MSA. Overall, community development lending is considered adequate.

In addition, Civista originated three community development loans supporting affordable housing efforts totaling \$5.4 million outside of its footprint. These loans were also considered given that Civista adequately met the needs of its assessment area.

Community Development Investments

During the review period, Civista's community development investments and donations within its designated footprint totaled \$2.26 million. Investments included two investments totaling \$1.74 million that supported economic development within its designated footprint. In addition, Civista committed \$2.0 million in investments in an Ohio equity fund that promotes the construction, rehabilitation, and preservation of affordable housing throughout Ohio. Because these investments benefit twelve projects throughout Ohio and three of the projects are located within Civista's footprint, funds were prorated within each assessment area based on the percent of each project's total dollar amount. Therefore, Civista received credit for \$478,000 toward community development investments within the bank's assessment areas. The areas benefitting from these investments included Erie, Huron, and Logan Counties. In addition, Civista received credit for eleven donations, totaling \$42,342 during this review period. Overall, community development investments are considered adequate.

In addition, Civista made a \$900,000 community development investment supporting economic development outside of the bank's footprint. This investment was also given consideration given that Civista adequately met the needs of its assessment areas.

Community Development Services

Civista's employees provided financial expertise to organizations with community development-related purposes. Services were provided in conjunction with organizations located in Erie, Franklin, Huron, Logan, and Ottawa Counties. Most services related to providing financial literacy to organizations that provide services to low- and moderate-income individuals or promote economic development in the region. Additionally, Civista directly supports financial literacy programs throughout its assessment areas, although only two of the schools are considered to be in low- and moderate-income school districts. Overall, community development services are considered adequate.

Fair Lending or Other Illegal Credit Practices Review

A substantive violation of Section 5(a) of the Federal Trade Commission Act involving unfair and deceptive late fee practices was identified in the concurrent consumer compliance examination as a result of inadequate compliance risk management practices. Civista's management is committed to correcting the violation. The violation caused Civista's CRA rating to be adjusted downward from "Satisfactory" to "Needs to Improve."

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE
SANDUSKY, OHIO METROPOLITAN STATISTICAL AREA 41780 (2012-2013)**
(Full-scope Review)

The Sandusky, Ohio Metropolitan Statistical Area 41780 (Sandusky MSA) consists of Erie County in Ohio and Civista's assessment area encompasses the entire county. The assessment area consists of a total of 19 census tracts, comprised of six moderate- (31.6%), eight middle- (42.1%), and four upper-income tracts (21.1%). There are no low-income census tracts in the assessment area nor any distressed or underserved tracts in this assessment area. There is also one tract with no income designation that is primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

Civista's lending performance in the Sandusky MSA is limited to 2012 and 2013. Based on updated U.S. Census data from the OMB, Erie County was eliminated from the Sandusky metropolitan statistical area. Therefore, Civista's 2014 lending performance in Erie County was considered as part of the Non-metropolitan North Central Ohio assessment area.

Erie County is located in northeastern Ohio and is a mixture of urban and rural areas. Sandusky is the largest city and county seat.

As of June 30, 2013, Civista ranked first of eleven institutions with 37.8% of the deposits in the assessment area. The second and third largest institutions were KeyBank, N.A. (21.7%) and PNC Bank, N.A. (13.7%), respectively. Deposits in this assessment area accounted for 41.9% of the institution's total deposits as of June 30, 2013. Further, Civista was the largest HMDA reporter in this assessment area, followed by Wells Fargo Bank, N.A. and JPMorgan Chase Bank, N.A. The bank had six offices, including the main office, in Erie County. It also operated two standalone cash-only ATMs in this area.

Civista originated 338 residential real estate, 147 small business, and 10 small farm loans in the Sandusky MSA from January 1, 2012 through December 31, 2013.

One community contact interview with an economic development organization in Erie County was conducted to provide additional information regarding the credit needs of the local community and context relative to the demographic and economic characteristics discussed below. According to the contact, businesses within the manufacturing industry continue to struggle; however, Erie County is home to many tourist destinations such as The Kalahari Resort and Convention Center and Cedar Point, as well as many other primary and secondary tourism businesses. As a result, since the tourism industry provided some diversification within the county, the impact on the manufacturing industry was not fully felt. However, outlying townships (e.g., those close to Huron County) did not experience the same industrial expansion and job creation as the more urban or tourist areas.

The contact mentioned there are many rental properties within the city of Sandusky, which is needed due to the number of low-income individuals and families that are unable to afford homeownership. The contact also stated that financial institutions lend to businesses and local banks and are responsive to the community, while specifically mentioning that Civista is supportive of the community.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 77,079. However, 2013 estimates for Erie County indicated the population was 76,048, which represented a decline of 1.3%. The percentage of the population living in moderate-income tracts was 27.8%. In addition, 77.8% of the population was 18 years of age or older, which is the legal age to enter a contract.

Income Characteristics

Based on 2010 U.S. Census data, the median family income of the assessment area was \$61,247, which was slightly more than Ohio’s median family income of \$59,680. As indicated in the table below, the median family income in the MSA decreased by 4.5% from 2012 to 2013.

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 |
| 2012 | \$57,200 | 0 | - \$28,599 | \$28,600 | - \$45,759 | \$45,760 | - \$68,639 | \$68,640 | - & above |
| 2013 | \$54,600 | 0 | - \$27,299 | \$27,300 | - \$43,679 | \$43,680 | - \$65,519 | \$65,520 | - & above |

The assessment area contained 31,855 households, of which 21,379 (67.1%) were families. Of the total families in the assessment area, 18.9% were low- and 20.5% were moderate-income families. Further, 8.5% of families were below the poverty level, as of the 2010 U.S. Census. Further, poverty rates increased from 8.3% in 1999¹ to 15.0% in 2013,² which is an increase of 80.7%.

Housing Characteristics

There were 37,808 housing units in the assessment area, based on 2010 U.S. Census data. The owner-occupancy rate was 61.4%, while 22.9% were rental units and 15.8% are vacant. From an income perspective, 30.1% of housing units and 22.8% of owner-occupied units were located in moderate-income tracts.

¹ 1999 National Poverty Rate: <http://www.census.gov/hhes/www/poverty/data/census/2000/poppvstat00.html>

² 2013 National Poverty Rate: <http://www.ers.usda.gov/data/povertyrates/>

Multi-family dwellings comprised 11.5% of the housing within the assessment area, with 38.6% of multi-family units in moderate-income tracts, suggesting that the demand for housing is concentrated in middle- and upper-income geographies.

The median age of the housing stock in the assessment area was 48 years old, with 32.6% of the housing stock built before 1950. Older homes such as these are typically more likely to require repairs and rehabilitation, indicating there could be a significant demand for home improvement and rehabilitation loans.

The median housing value in the assessment area was \$138,116 as of the 2010 U.S. Census, with an affordability ratio of 33.5%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

Based on the 2013 median family income for the MSA (\$56,700), about 33.8% of the homes valued up to \$106,475 would be considered affordable for low-income individuals and approximately 65.3% of the homes valued up to \$170,359 would be considered affordable for moderate-income individuals. These percentages were calculated assuming an average mortgage payment equal to 28.0% of gross income for a 3.80% fixed-rate, 30-year loan.

Data related to property foreclosures in Erie County can be found in the Non-metropolitan North Central Ohio (2014) section.

Labor, Employment, and Economic Characteristics

The primary employment sectors and major employers in Erie County are included in the Non-metropolitan North Central Ohio (2014) section.

The following table illustrates the average unemployment rates for 2012 and 2013 for Erie County, the MSA, and Ohio.

| Unemployment Rates Sandusky OH MSA (not seasonally adjusted) | | |
|---|-------------|-------------|
| Area | 2012 | 2013 |
| Erie County (Sandusky MSA) | 7.5 | 7.5 |
| Ohio | 7.4 | 7.4 |

The unemployment rate in Erie County remained unchanged from 2012 to 2013 and was comparable to the Ohio average unemployment rate.

Combined Demographics Report

Assessment Area(s): Sandusky MSA 2013

| 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 | 4,031 | 18.9 |
| Moderate-income | 6 | 31.6 | 5,231 | 24.5 | 962 | 18.4 | 4,386 | 20.5 |
| Middle-income | 8 | 42.1 | 10,934 | 51.1 | 701 | 6.4 | 4,432 | 20.7 |
| Upper-income | 4 | 21.1 | 5,214 | 24.4 | 160 | 3.1 | 8,530 | 39.9 |
| Unknown-income | 1 | 5.3 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 19 | 100.0 | 21,379 | 100.0 | 1,823 | 8.5 | 21,379 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Moderate-income | 11,368 | 5,281 | 22.8 | 46.5 | 3,975 | 35 | 2,112 | 18.6 |
| Middle-income | 17,548 | 12,028 | 51.8 | 68.5 | 3,493 | 19.9 | 2,027 | 11.6 |
| Upper-income | 8,892 | 5,897 | 25.4 | 66.3 | 1,181 | 13.3 | 1,814 | 20.4 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 37,808 | 23,206 | 100.0 | 61.4 | 8,649 | 22.9 | 5,953 | 15.7 |
| | 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 |
| Moderate-income | 994 | 24.9 | 872 | 24.5 | 92 | 34.3 | 30 | 19.4 |
| Middle-income | 2,015 | 50.5 | 1,811 | 50.8 | 115 | 42.9 | 89 | 57.4 |
| Upper-income | 979 | 24.5 | 882 | 24.7 | 61 | 22.8 | 36 | 23.2 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 3,988 | 100.0 | 3,565 | 100.0 | 268 | 100.0 | 155 | 100.0 |
| Percentage of Total Businesses: | | | | 89.4 | | 6.7 | | 3.9 |
| | 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 |
| Moderate-income | 4 | 2.2 | 4 | 2.2 | 0 | 0 | 0 | 0 |
| Middle-income | 113 | 61.7 | 113 | 61.7 | 0 | 0 | 0 | 0 |
| Upper-income | 66 | 36.1 | 66 | 36.1 | 0 | 0 | 0 | 0 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 183 | 100.0 | 183 | 100.0 | 0 | .0 | 0 | .0 |
| Percentage of Total Farms: | | | | 100.0 | | .0 | | .0 |

Based on 2013 D&B information according to 2010 ACS boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SANDUSKY, OHIO METROPOLITAN STATISTICAL AREA (2012-2013)

Lending Test

Civista's lending performance in the Sandusky MSA is considered reasonable. Civista has an excellent geographic distribution of loans in the area, a reasonable distribution among borrowers of different income levels, and a reasonable distribution of loans to businesses of different revenue sizes.

Civista originated 202 home refinance loans, 90 home purchase loans, 42 home improvement loans, four multi-family loans, 231 small business loans, 14 small farm loans and two community development loans during the evaluation period. There were not enough small farm loans to conduct a meaningful analysis.

Details of the bank's residential mortgage and small business lending and lending by peers can be found in Appendix B.

Geographic Distribution

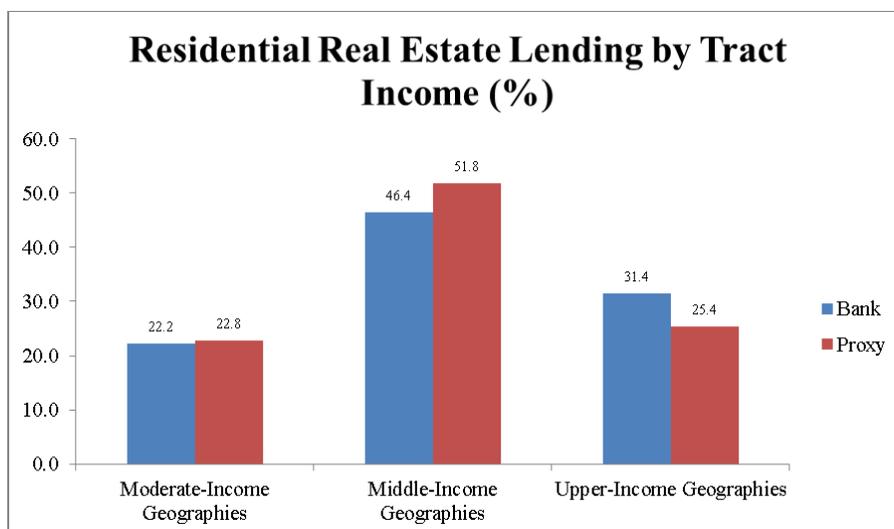
Civista holds a sizeable deposit share of the market and is a leader in mortgage lending, although it faces competition from several large, well-established institutions in this area. The top CRA lenders in this market were issuers of high volumes of commercial credit cards that offer small businesses a flexible form of financing, which may have negatively impacted Civista's ability to originate small-dollar commercial loans.

During the evaluation period (2012-2013), Civista originated loans in all of the census tracts within the assessment area, with the exception of the unknown-income census tract.

Civista's overall distribution of lending among geographies is excellent.

Residential Real Estate

As shown in the following chart, residential real estate lending in moderate-income tracts was comparable to the percentage of owner-occupied units (proxy). Civista outperformed aggregate HMDA reporters (peer) in the assessment area. The percentage of Civista's residential real estate lending in moderate-income tracts was 22.4% and 22.0% in 2012 and 2013, respectively, as compared to peer with 13.9% and 16.2%, respectively.



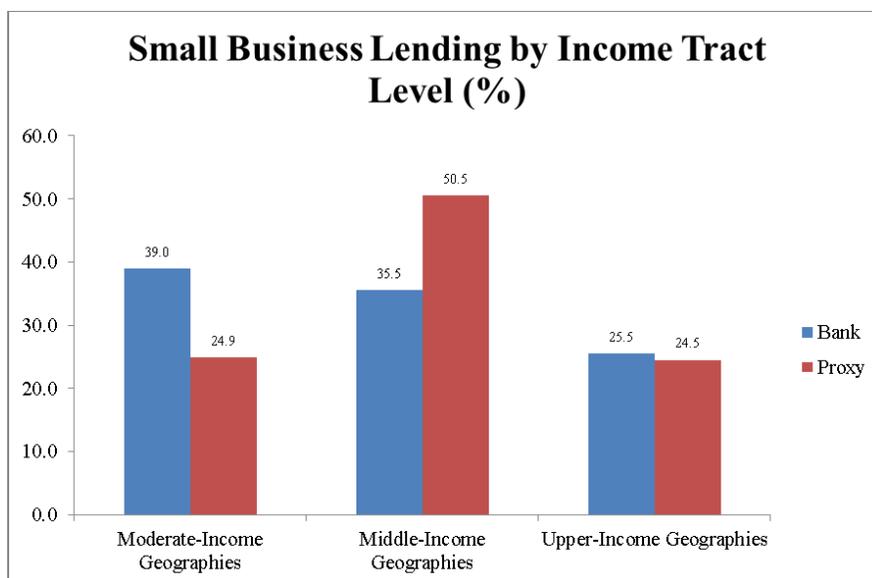
There are several factors that may limit Civista's, ability to originate loans in moderate-income tracts. The age of the housing stock at 48 years in the moderate-income tract means that prospective homebuyers would need to budget for home improvement and upkeep costs, in addition to mortgage repayment costs. In addition, 18.4% of the families in moderate-income tracts have income below the poverty level and would likely not be able to qualify for any type of mortgage loan. Further, 35.0% of all housing units in moderate-income tracts are rental housing units.

The distribution of residential real estate loans is less than proxy in middle-income geographies and above proxy in upper-income geographies.

Overall, the geographic distribution of residential real estate lending is excellent.

Small Business Lending

As shown in the following chart, small business lending in moderate-income tracts was greater than the percentage of small businesses located in moderate-income tracts (proxy). While the bank's performance was below that of the proxy in middle-income tracts, it is comparable to the proxy in upper-income geographies. Overall, the geographic distribution of small business lending is excellent in the Sandusky MSA.



Distribution by Borrower Income and Revenue Size of the Business

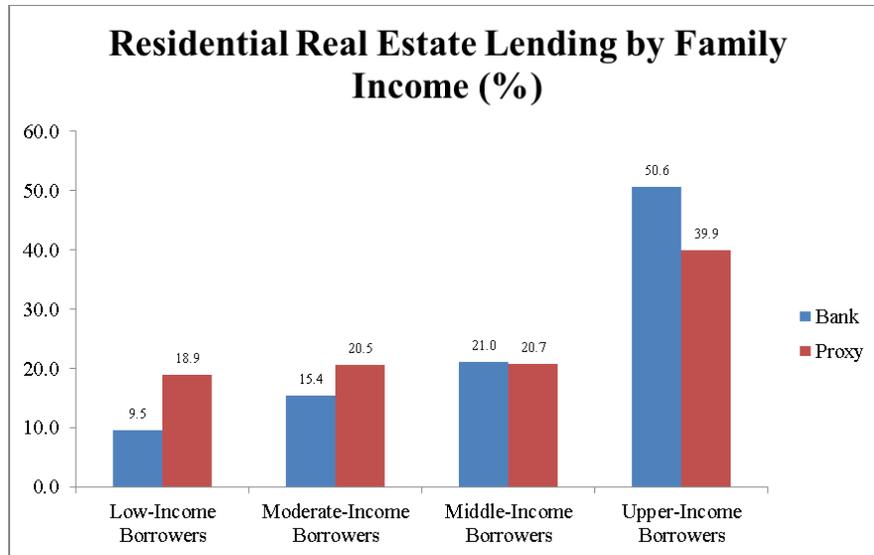
The distribution of loans is reasonable based on borrower's income and for businesses of different revenue sizes. Most businesses within the bank's assessment area have annualized revenues less than \$1 million.

Residential Real Estate Loans

Residential real estate lending to low- and moderate-income borrowers was lower than the percentage of low-income families (proxy) in the assessment area.

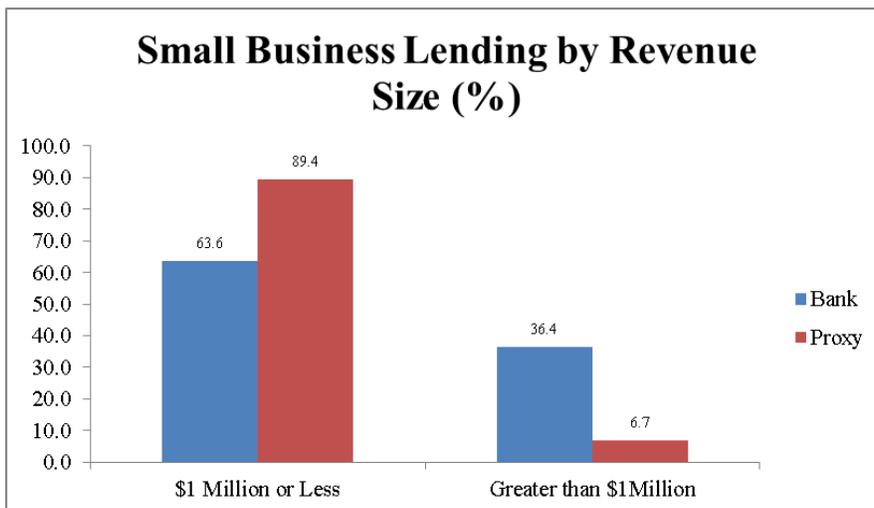
Poverty rates within the assessment area increased significantly in recent years and the median family income was reduced, therefore, it may be difficult for low-income individuals to qualify for loans, especially if income is below the poverty level. Given the affordability ratios, many of the homes within the assessment area were not considered affordable for low- and moderate-income families. As a result, opportunities to lend to low- and moderate-income individuals may be reduced. Further, the increased age of housing stock means that prospective buyers would need to budget for home improvement and upkeep costs, in addition to mortgage repayment costs.

Residential real estate lending to middle-income borrowers was comparable to the proxy, while lending to upper-income borrowers exceeded proxy and peer.

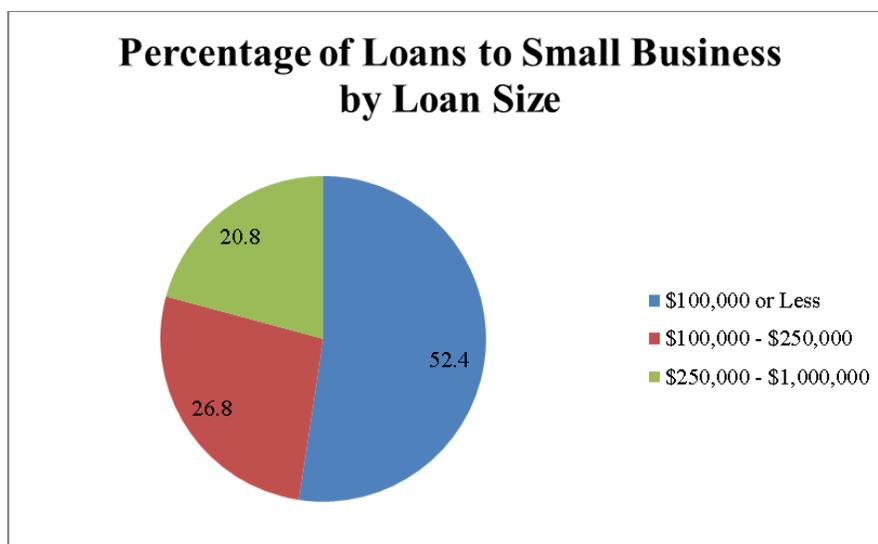


Overall, the distribution of residential real estate loans to borrowers of different income levels is reasonable.

Small Business Loans



Civista originated more than half of small business loans to businesses with annual revenues less than \$1 million, although this was lower than the percentage of small businesses in the assessment area with annual revenues less than \$1 million (proxy).



During the evaluation period, all small business loans that Civista originated were in the amounts of \$1 million or less. Further analysis of small business lending shows 52.4% of Civista's small business loans in 2012 and 2013 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 amount loans. Given the competition from other financial institutions in the market, including high issuers of credit cards, this demonstrates an excellent responsiveness to meeting the credit needs of small businesses in the area.

Overall, the distribution of loans based on the revenue size of businesses is reasonable.

Community Development Test

Civista demonstrated an adequate level of responsiveness related to community development lending, investments, and services, considering the bank's capacity and the need and availability of such opportunities in the assessment area.

Community Development Loans

Civista originated one community development loan for \$1.3 million in the Sandusky MSA. The loan supported economic development in Erie County. In addition, partial credit (\$200,000) was given for another community development loan that, in part, supported affordable housing in the assessment area. Community development lending in this assessment area represented 13.0% of the total dollar volume of community development loans originated by the bank during the evaluation period.

Community Development Investments

The Sandusky MSA received credit for \$191,807 in investments to the Ohio Equity Fund based on the amount of funding designated to finance an affordable housing project located in Erie County. In addition, Erie County also received benefit from a majority of the donations discussed under non-MSA North Central Ohio.

Community Development Services

Civista's employees provided financial expertise to four organizations that service Erie County. In addition, Civista sponsored a financial literacy program that benefits low- and moderate-income students at one school within the assessment area.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
NON-METROPOLITAN NORTH CENTRAL OHIO (2012-2013)**
(Full-scope Review)

The Non-metropolitan North Central Ohio assessment area in 2012 and 2013 consists of the entirety of Crawford and Huron Counties, as well as two middle-income tracts in eastern portions of Seneca County. Overall, the assessment area consists of four moderate- (14.3%), 20 middle- (71.4%), and four upper-income tracts (14.3%). There are no low-income census tracts nor any distressed or underserved tracts in this assessment area. During this time period, Civista had five offices in Huron County and three offices in Crawford County.

As of June 30, 2013, Civista ranked third of 23 institutions with 8.4% of the deposits in the assessment area. The two largest institutions were PNC Bank, N.A. and Old Fort Banking Company with 9.7% and 8.5% of the deposit share, respectively. Deposits in this assessment area accounted for 22.0% of the institution's total deposits as of June 30, 2013. Civista was ranked 18th of 161 HMDA reporters in this area.

From January 1, 2012 through December 31, 2013, Civista originated 99 residential real estate loans, 121 small business loans, and 79 small farm loans during the evaluation period.

One community contact interview with an economic development organization in Crawford County was conducted to provide additional information regarding the credit needs of the local community and context to the demographic and economic characteristics discussed below. The contact stated that Crawford County suffered some decline as a result of the recession, but the manufacturing industry remains strong, with new businesses appearing and tourism beginning to grow. According to the contact, housing prices remain low with ample affordable housing in the county. While there is an increase in refinancing activity, the demand for new home construction remains low. Consequently, there are various sources of funds for new and existing companies looking for financing, and a need for financing for capital equipment, lines of credit, and funding for start-ups and expansion.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 111,417. The percentage of the population living in moderate-income tracts was 12.7%. In addition, 75.1% of the population was 18 years of age or older, which is the legal age to enter a contract.

The following table shows the population in the assessment area for 2010 and 2013,³ with the percentage of population change. All of the counties experienced a decline in population, with Crawford County exhibiting the largest decline during this time period.

³ Population Estimates derived from U.S. Census Data: <http://www.census.gov/popest>

| County | 2010 Population | 2013 Population | Population Percent Change |
|----------|-----------------|-----------------|---------------------------|
| Crawford | 43,784 | 42,808 | -2.2% |
| Huron | 59,626 | 58,889 | -1.2% |
| Seneca | 56,745 | 55,914 | -1.5% |

Income Characteristics

Based on 2010 U.S. Census data, the median family income of the assessment area was \$51,584, which was less than Ohio's median family income of \$59,680. The median family income ranged from a low of \$49,647 in Crawford County to a high of \$53,887 in Huron County. From 2012 to 2013, the median family income in non-metropolitan Ohio decreased by 1.1%.

Borrower Income Levels Ohio State Non-Metro

| HUD Estimated Median Family Income | | Low | Moderate | Middle | Upper |
|------------------------------------|-----------------|--------------|---------------------|---------------------|--------------------|
| | | 0 - 49.99% | 50% - 79.99% | 80% - 119.99% | 120% - & above |
| 2012 | \$53,600 | 0 - \$26,799 | \$26,800 - \$42,879 | \$42,880 - \$64,319 | \$64,320 - & above |
| 2013 | \$53,000 | 0 - \$26,499 | \$26,500 - \$42,399 | \$42,400 - \$63,599 | \$63,600 - & above |

In 2010, the assessment area contained 44,205 households, of which 31,228 (70.6%) were families. Of the total families in the assessment area, 18.6% were low-income and 18.5% were moderate-income families. Further, 10.8% of families were below the poverty level.

The following table shows the poverty rates for 1999⁴ and 2013.⁵

| County | 1999 Poverty Rate | 2013 Poverty Rate | Change |
|----------------------|-------------------|---------------------------|--------------|
| Crawford | 10.4% | 18.2% | 75.0% |
| Huron | 8.5% | 14.6% | 71.8% |
| Seneca | 9.0% | 13.9% | 54.4% |
| Ohio | 10.6% | 15.9% | 50.0% |
| United States | 12.4% | 15.8% ⁶ | 27.4% |

Poverty rates increased significantly in all three counties in the assessment area from 1999 to 2013. Poverty rates in Ohio and the assessment area rose at a higher rate than that of the United States. Crawford County had the highest poverty rate in 1999 and 2013, as well as the greatest increase in poverty rates for the time period. Huron County also experienced a significant increase in poverty rates from 1999 to 2013.

⁴ 1999 National Poverty Rate: <http://www.census.gov/hhes/www/poverty/data/census/2000/poppvstat00.html>

⁵ 2013 National Poverty Rate: <http://www.ers.usda.gov/data/povertyrates/>

⁶ <http://www.ers.usda.gov/topics/rural-economy-population/rural-poverty-well-being/poverty-overview.aspx>

Housing Characteristics

There were 48,581 housing units in the assessment area, as of the 2010 U.S. Census. The owner-occupancy rate was 67.6%. From an income perspective, 13.8% of housing units and 10.8% of owner-occupied units were located in moderate-income tracts. Multi-family dwellings comprised 5.63% of the housing within the assessment area, with 21.0% of multi-family units in moderate-income tracts. These numbers indicate that demand for housing would most likely be concentrated in middle-income and upper-income tracts.

The median age of the housing stock in the assessment area was 53 years old, with 40.2% of the housing stock built before 1950. The youngest housing stock was in Huron County, with a median age of 45 years. The housing stock in Crawford and Seneca Counties had median ages of 57 years and 58 years, respectively, indicating there could be a large demand for home improvement and rehabilitation loans.

The median housing value in the assessment area was \$108,663, as of the 2010 U.S. Census, with an affordability ratio of 40.7%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. The affordability ratio ranged from a low of 38.7% in Huron County to a high of 44.0% in Crawford County.

Based on the 2013 median family income for Non-metropolitan North Central Ohio (\$53,000), about 44.0% of the homes valued up to \$99,527 would be considered affordable for low-income individuals and approximately 76.0% of the homes valued up to \$159,242 would be considered affordable for moderate-income individuals. These percentages were calculated assuming an average mortgage payment equal to 28.0% of gross income for a 3.80% fixed-rate, 30-year loan.

Data related to property foreclosures in Erie County can be found in the Non-metropolitan North Central Ohio (2014) section.

Labor, Employment, and Economic Characteristics

The primary employment sectors and major employers in the counties in the Crawford, Huron and Seneca Counties are included in the Non-metropolitan North Central Ohio section.

The following table illustrates the average unemployment rates for 2012 and 2013 for the counties in the assessment area and the state of Ohio.

| Unemployment Rates Non-metropolitan North Central Ohio (not seasonally adjusted) | | |
|---|-------------|-------------|
| Area | 2012 | 2013 |
| Crawford County | 9.0 | 8.8 |
| Huron County | 10.5 | 10.8 |
| Seneca County | 7.5 | 7.3 |
| Ohio | 7.4 | 7.4 |

(P) Preliminary as of December 2014

Unemployment rates declined in all three counties from 2012 to 2014. While the unemployment rate in Seneca County was comparable to the average unemployment rate for Ohio, Crawford and Huron Counties experienced unemployment rates higher than those for Ohio.

Combined Demographics Report

Assessment Area(s): Non Metro North Central Ohio 2013

| 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 | 5,797 | 18.6 |
| Moderate-income | 4 | 14.3 | 3,808 | 12.2 | 738 | 19.4 | 5,775 | 18.5 |
| Middle-income | 20 | 71.4 | 22,817 | 73.1 | 2,255 | 9.9 | 7,438 | 23.8 |
| Upper-income | 4 | 14.3 | 4,603 | 14.7 | 387 | 8.4 | 12,218 | 39.1 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 28 | 100.0 | 31,228 | 100.0 | 3,380 | 10.8 | 31,228 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Moderate-income | 6,724 | 3,546 | 10.8 | 52.7 | 2,375 | 35.3 | 803 | 11.9 |
| Middle-income | 35,477 | 24,109 | 73.4 | 68 | 8,239 | 23.2 | 3,129 | 8.8 |
| Upper-income | 6,380 | 5,193 | 15.8 | 81.4 | 743 | 11.6 | 444 | 7 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 48,581 | 32,848 | 100.0 | 67.6 | 11,357 | 23.4 | 4,376 | 9.0 |
| | 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 |
| Moderate-income | 691 | 15.2 | 608 | 15 | 54 | 18.4 | 29 | 15.5 |
| Middle-income | 3,262 | 71.7 | 2,902 | 71.4 | 225 | 76.5 | 135 | 72.2 |
| Upper-income | 594 | 13.1 | 556 | 13.7 | 15 | 5.1 | 23 | 12.3 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 4,547 | 100.0 | 4,066 | 100.0 | 294 | 100.0 | 187 | 100.0 |
| Percentage of Total Businesses: | | | | 89.4 | | 6.5 | | 4.1 |
| | 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 |
| Moderate-income | 11 | 1.4 | 11 | 1.4 | 0 | 0 | 0 | 0 |
| Middle-income | 578 | 71.8 | 573 | 71.8 | 5 | 71.4 | 0 | 0 |
| Upper-income | 216 | 26.8 | 214 | 26.8 | 2 | 28.6 | 0 | 0 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 805 | 100.0 | 798 | 100.0 | 7 | 100.0 | 0 | .0 |
| Percentage of Total Farms: | | | | 99.1 | | .9 | | .0 |

Based on 2013 D&B information according to 2010 ACS boundaries.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
NON-METROPOLITAN NORTH CENTRAL OHIO (2012-2013)**

Lending Test

Civista’s performance under the lending test in this assessment area is reasonable. Civista has a reasonable geographic distribution of loans in the area, a reasonable distribution among borrowers of different income levels, and a reasonable distribution of loans to businesses of different revenue sizes.

Civista originated 99 residential real estate (consisting of 59 home refinance, 21 home purchase, 17 home improvement, and two multi-family loans), 121 small business, 79 small farm, and two community development loans during the evaluation period.

Equal consideration was given to the evaluation of small business and residential real estate loans given the similarity in overall volume of lending. Small farm lending received the least consideration. Further, less emphasis was placed on geographic distribution of loans because there are no low-income geographies and only four (14.3%) moderate-income geographies designated within the assessment area. Therefore, greater consideration was given to the distribution by borrower income and revenue size of the business.

Details of the bank’s residential mortgage and small business lending and lending by peers can be found in Appendix B.

Geographic Distribution

Civista faces competition from other well-established institutions in the assessment area, with the top five banks in the area hold similar deposit shares of the market as illustrated in the table below:

| # | Financial Institution | Deposit Market Share |
|---|---|----------------------|
| 1 | PNC Bank, N.A. | 9.66% |
| 2 | The Old Fort Banking Company | 8.51% |
| 3 | Civista Bank (fka The Citizens Banking Company) | 8.44% |
| 4 | Sutton Bank | 7.60% |
| 5 | The Croghan Colonial Bank | 6.69% |

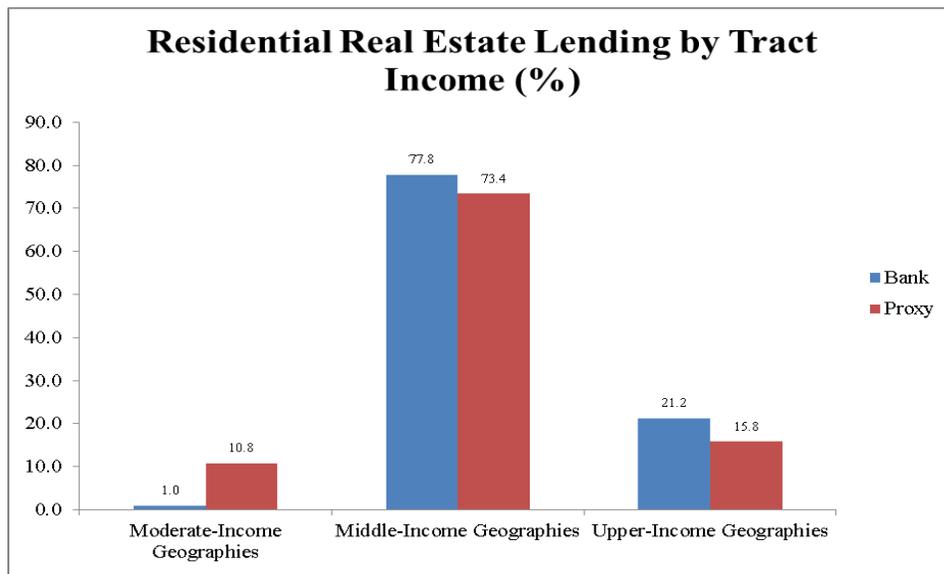
Civista is not among the largest mortgage lenders in this market, according to HMDA loan application register filings. Many of the top CRA lenders in this market were issuers of high volumes of commercial credit cards that offer small businesses a flexible form of financing, which may have negatively impacted Civista’s ability to originate small-dollar commercial loans.

During the evaluation period, Civista had moderate lending gaps in moderate-income geographies, as it only originated loans in two of the four moderate-income tracts. Loans were originated in all of the middle- and upper-income tracts within the assessment area.

Civista’s overall distribution of lending among geographies is reasonable. Residential real estate lending is reasonable, while small business lending is poor and small farm lending is reasonable.

Residential Real Estate Loans

As shown in the chart below, residential real estate lending in moderate-income tracts was significantly less than the percentage of owner-occupied units (proxy).



There are several factors that may limit Civista’s ability to originate loans in moderate-income tracts. Rental units comprise 35.3% of all housing units in moderate-income tracts, while only 52.7% of housing units in moderate income tracts are owner-occupied, compared to 68.0% and 81.4%, respectively, in middle- and upper-income geographies. The age of the housing stock at 53 years indicates that prospective homebuyers would need to budget for home improvement and upkeep costs, in addition to mortgage repayment costs. In addition, 19.4% of the families in moderate-income tracts have income below the poverty level and would likely not be able to qualify for any type of mortgage loan.

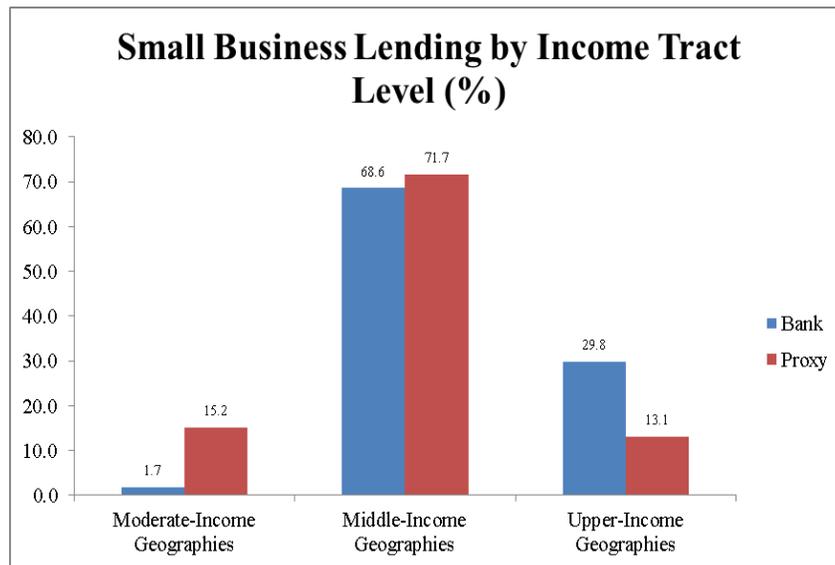
While limitations may exist, the bank’s performance was lower than the aggregate performance of HMDA reporters in the assessment area. In 2012 Civista originated 1.8% of residential real estate loans in moderate-income tracts and no residential real estate loans in moderate-income tracts in 2013. The percentage of residential real estate loans originated by all HMDA reporters was 6.2% and 6.1%, respectively, for 2012 and 2013.

The distribution of residential real estate loans among middle- and upper-income geographies is generally comparable to that of the proxy.

Overall, the geographic distribution of residential real estate lending is reasonable.

Small Business Lending

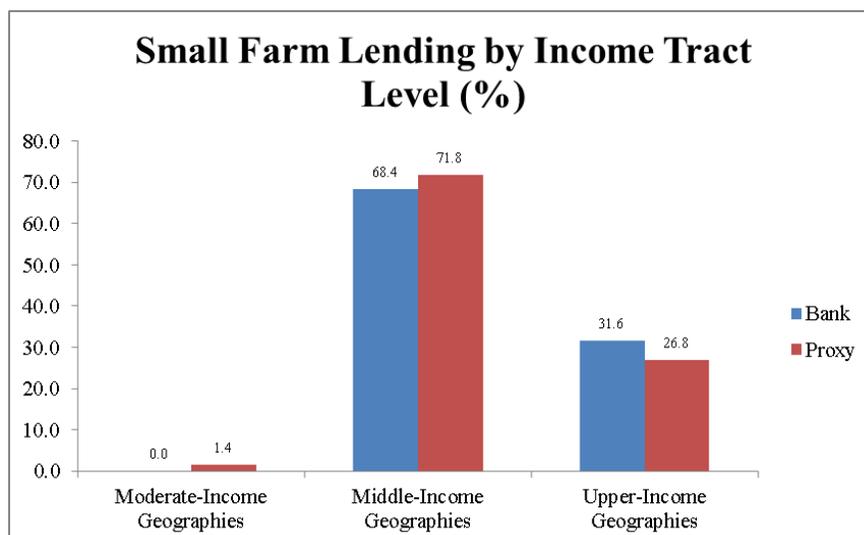
As shown in the chart above, small business lending in moderate-income tracts was significantly less than the percentage of small businesses located in moderate-income tracts (proxy). While Civista's performance was comparable to that of the proxy in middle-income tracts, it is higher than proxy in upper-income geographies.



Overall, the geographic distribution of small business lending is poor.

Small Farm Lending

As shown in the chart above, Civista did not originate any small farm loans in moderate-income tracts in 2012 and 2013. However, small farm lending opportunities were limited, given the low number of small farms located in moderate-income tracts. In middle- and upper-income tracts, small farm lending was generally comparable to the percentage of small farms located in the respective tracts.



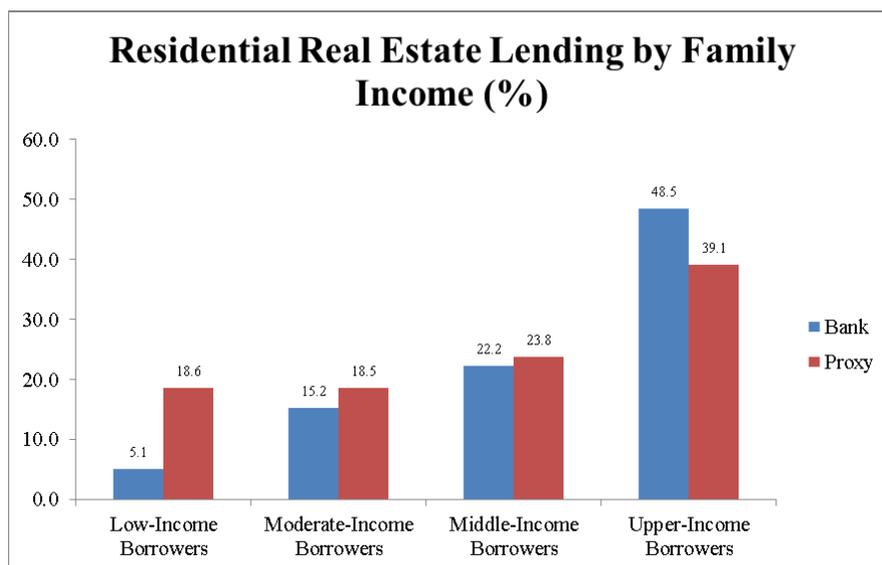
Overall, the geographic distribution of small farm lending is reasonable.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is reasonable based on borrower’s income, reasonable for businesses of different revenue sizes, and excellent for small farms of different revenue sizes. Most businesses within Civista’s assessment area have annualized revenues less than \$1 million.

Residential Real Estate Loans

Residential real estate lending to low-income borrowers was significantly lower than the percentage of low-income families in the assessment area (proxy). Residential real estate lending to moderate-income borrowers was also lower than the percentage of low-income families, while lending to middle-income families was comparable to that of proxy. The level of residential real estate lending to upper-income borrowers exceeded the percentage of low-income families in the assessment area (proxy).

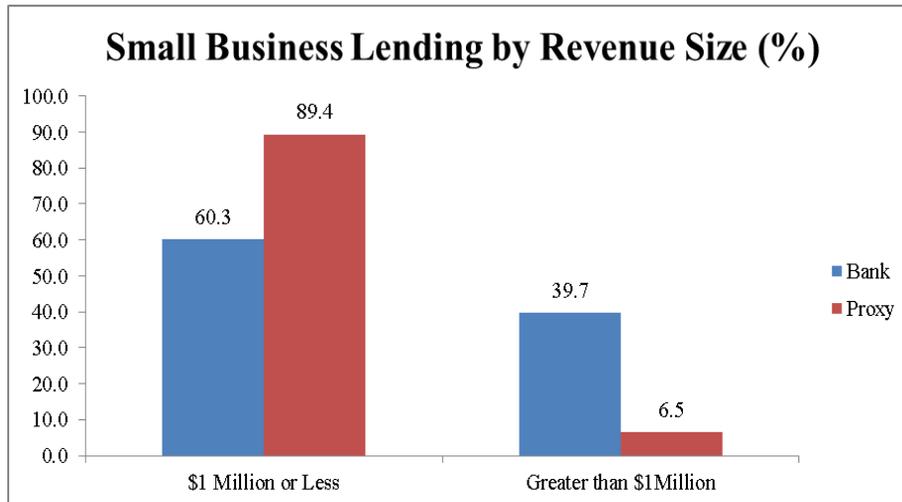


Often, it may be difficult for low-income individuals to qualify for loans. Given the affordability ratios discussed previously and that the poverty rates within the assessment area increased significantly in recent years, many of the homes within the assessment area were not considered affordable for families below the poverty level. Unemployment rates in Crawford and Huron Counties exceeded the average unemployment rate for Ohio and the nation. Therefore, opportunities to lend to low- and moderate-income individuals may be limited.

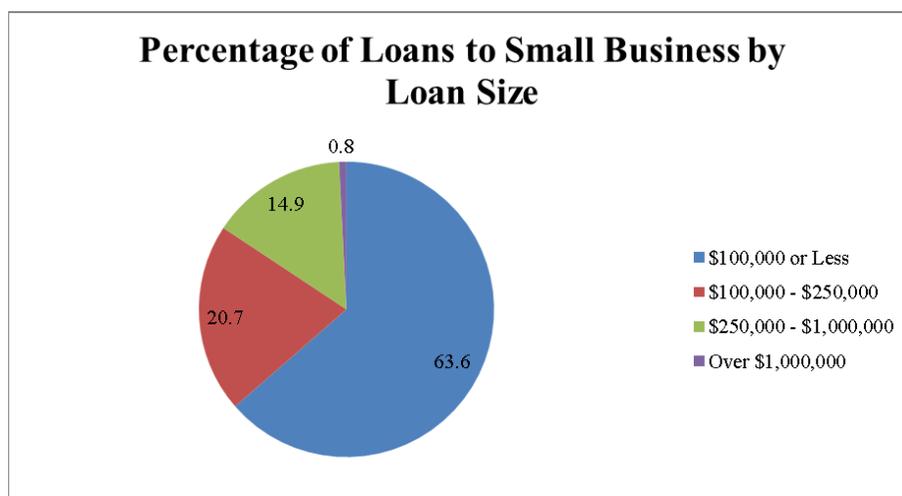
Overall, the distribution of residential real estate loans to borrowers of different income levels is reasonable.

Small Business Loans

Civista originated more than half of small business loans to businesses with annual revenues less than \$1 million, although this was lower than the percentage of small businesses in the assessment area with annual revenues less than \$1 million (proxy).



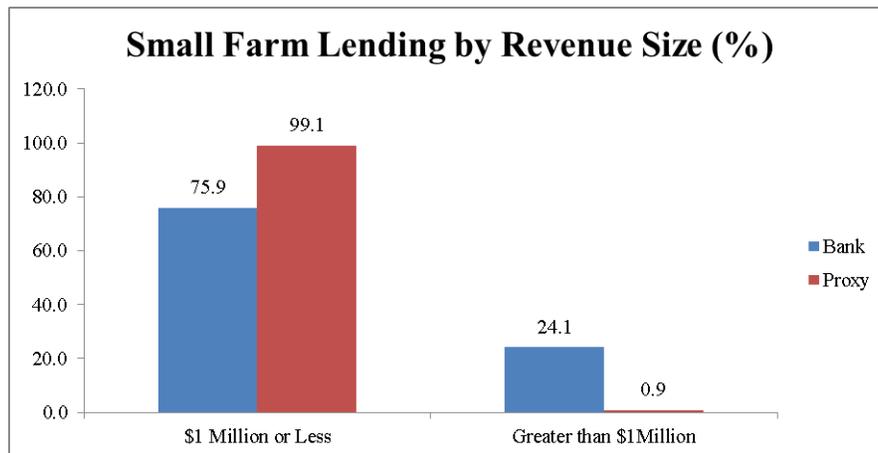
Further analysis of small business lending shows 63.6% of Civista’s small business loans in 2012 and 2013, were for \$100,000 or less. Typically, the extent to which a bank is willing to extend loans in amounts of \$100,000 or less is reviewed because smaller businesses often have a greater need for small-dollar loans. Given the competition from other financial institutions in the market, this demonstrates an excellent responsiveness to meeting the credit needs of small businesses in the area.



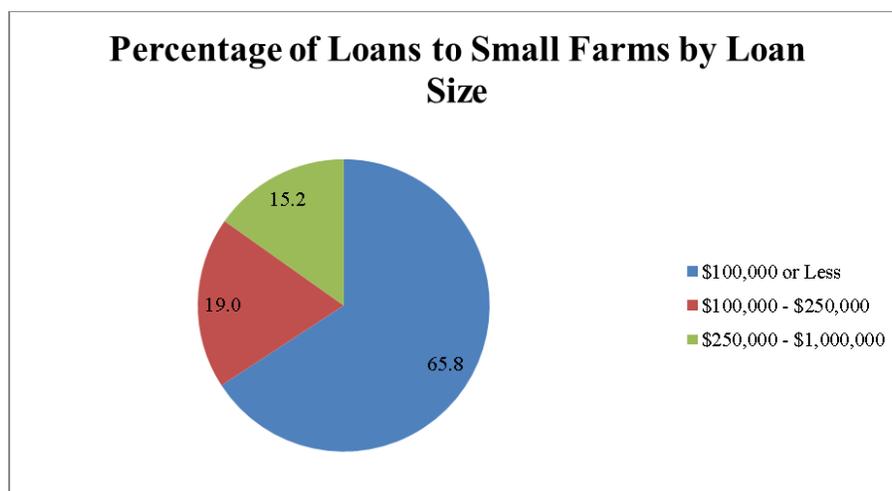
Overall, the distribution of loans based on the revenue size of businesses is reasonable.

Small Farm Loans

Civista originated a majority of small farm loans to farms with annual revenues less than \$1 million, although this was lower than the percentage of small farms in the assessment area with annual revenues less than \$1 million (proxy).



During the evaluation period, all of the small farm loans that Civista originated were for \$1 million or less. Further analysis of small farm lending shows 65.8% of Civista’s small farm loans in 2012 and 2013, 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. Given the competition from other financial institutions in the market, this demonstrates an excellent responsiveness to meeting the credit needs of small farms in the area.



Overall, the distribution of loans based on the revenue size of businesses and farms is excellent.

Community Development Test

Civista demonstrated an overall adequate level of responsiveness related to community development lending, investments, and services, considering the bank's capacity and the need and availability of such opportunities in the assessment area.

Community Development Loans

Civista originated one community development loan of \$400,000 in the assessment area for affordable housing. In addition, partial credit (\$200,000) was given for another community development loan that, in part, supported affordable housing in the assessment area. Community development lending in this assessment area represented 5.2% of the total dollar volume of community development loans originated by the bank during the evaluation period.

Community Development Investments

The assessment area received credit for \$88,521 in investments to the Ohio Equity Fund based on the amount of funding designated to finance an affordable housing project located in Huron County. Donations to support community development in this assessment area are discussed under non-MSA North Central Ohio (2014).

Community Development Services

Civista's employees provided financial expertise to three organizations that service Huron County.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
NON-METROPOLITAN NORTH CENTRAL OHIO (2014)**
(Full-scope Review)

In 2014, the Non-metropolitan North Central Ohio assessment area consists of the entirety of Crawford, Huron, and Erie Counties, as well as eight tracts in eastern Ottawa County and two middle-income tracts in eastern portions of Seneca County. Overall, the assessment area consists of seven moderate- (12.7%), 32 middle- (58.2%), and 15 upper-income census tracts (27.3%). There are no low-income census tracts nor any distressed or underserved tracts within this assessment area. There is one census tract with no income designation that is primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

In 2013, the OMB announced revision to MSA delineations, thus eliminating Erie County as a MSA and removing Ottawa County from the Toledo MSA. Therefore, for the purposes of this analysis, Erie County and portions of Ottawa County have been combined with Non-metropolitan North Central Ohio in order to evaluate Civista's lending in this area during January 1, 2014 through September 30, 2014.

As of June 30, 2014, Civista ranked first of 26 institutions with 15.2% of the deposits in the assessment area. The second and third largest institutions were KeyBank, N.A. (9.5%) and PNC Bank, N.A. (9.1%), respectively. Deposits in this assessment area accounted for 66.6% of the institution's total deposits, as of June 30, 2014.

Civista has six offices, including the main office, in Erie County; five offices in Huron County; and one office in Ottawa County. It also has one office in Crawford County, after closing two offices in Chatfield and Tiro, which are part of Crawford County. Civista also operates three standalone cash-only ATMs in this area.

Two community contact interviews were conducted to provide additional information about the assessment area; details of these interviews can be found within the descriptions of the Sandusky MSA and Non-metropolitan North Central Ohio (2012-2013).

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 207,921. The percentage of the population living in moderate-income tracts was 12.0%. According to the population data for 2010 to 2013, which can be found the Sandusky MSA and the Non-metropolitan North Central Ohio (2012-2013) sections, all counties within the assessment area experienced a decline in population. In addition, 76.7% of the population was 18 years of age or older, which is the legal age to enter a contract.

Income Characteristics

Based on 2010 U.S. Census data, the median family income of the assessment area was \$55,355, which was less than Ohio's median family income of \$59,680. The median family income ranged from a low of \$49,647 in Crawford County to a high of \$64,258 in Ottawa County. The median family income in non-metropolitan Ohio increased from 2012 to 2014 by 3.9%.

Borrower Income Levels Ohio State Non-Metro

| HUD Estimated Median Family Income | | Low | | Moderate | | Middle | | Upper | |
|------------------------------------|-----------------|-----|------------|----------|------------|----------|------------|----------|-----------|
| | | 0 | - 49.99% | 50% | - 79.99% | 80% | - 119.99% | 120% | - & above |
| 2012 | \$53,600 | 0 | - \$26,799 | \$26,800 | - \$42,879 | \$42,880 | - \$64,319 | \$64,320 | - & above |
| 2013 | \$53,000 | 0 | - \$26,499 | \$26,500 | - \$42,399 | \$42,400 | - \$63,599 | \$63,600 | - & above |
| 2014 | \$55,700 | 0 | - \$27,849 | \$27,850 | - \$44,559 | \$44,560 | - \$66,839 | \$66,840 | - & above |

In 2010, the assessment area contained 85,099 households, of which 58,562 (68.8%) were families. Of the total families in the assessment area, 17.0% were low- and 17.8% were moderate-income families. Further, 9.6% of families were below the poverty level.

As evidenced in the data provided under the Sandusky MSA and Non-metropolitan North Central Ohio (2012-2013) sections, poverty rates increased significantly in all five counties in the assessment area from 1999 to 2013.

Housing Characteristics

There were 103,968 housing units in the assessment area, as of the 2010 U.S. Census. The owner-occupancy rate was 60.7%. From an income perspective, 12.1% of housing units and 9.5% of owner-occupied units were located in moderate-income tracts. Multi-family dwellings comprised 8.3% of the housing within the assessment area, with 17.5% of multi-family units in moderate-income tracts. These numbers indicate that demand for housing would likely be concentrated in middle-income and upper-income tracts.

The median age of the housing stock in the assessment area was 48 years old, with 34.4% of the housing stock built before 1950. The youngest housing stock was in Ottawa County, with a median age of 39 years. The housing stock in Crawford and Seneca Counties had median ages of 57 years and 58 years, respectively, indicating there could be a large demand for home improvement and rehabilitation loans.

The median housing value in the assessment area was \$121,704, as of the 2010 U.S. Census, with an affordability ratio of 37.1%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. The affordability ratio ranged from a low of 33.7% in Erie County to a high of 44.0% in Crawford County.

Based on the 2014 median family income for Non-metropolitan North Central Ohio (\$55,700), about 39.8% of the homes valued up to \$104,597 would be considered affordable for low-income individuals and approximately 70.9% of the homes valued up to \$167,354 would be considered affordable for moderate-income individuals. These percentages were calculated assuming an average mortgage payment equal to 28.0% of gross income for a 3.80% fixed-rate, 30-year loan.

The following table contains information about foreclosure filings and the number of properties in foreclosure.⁷

| Geography Name | Ratio of Properties Receiving Foreclosure Filings in (March 2015) |
|-----------------------|--|
| Crawford County | 1:682 |
| Erie County | 1:1,539 |
| Huron County | 1:862 |
| Ottawa County | 1:1,302 |
| Seneca County | 1:1,222 |
| Ohio | 1:955 |
| United States | 1:1,082 |

Crawford County had the highest rate of properties in foreclosure in the assessment area in March 2015 and Erie County had the lowest foreclosure rate. Crawford and Huron Counties had higher foreclosure rates than Ohio and the United States.

Labor, Employment, and Economic Characteristics

The primary employment sectors and major employers in the counties in the assessment area as identified by the Ohio Development Services Agency are identical to those discussed under Sandusky MSA and Non-metropolitan North Central Ohio (2012-2013), with the addition of the following employers in Ottawa County as follows:⁸

| County | Primary Employment Sectors | Major Employers |
|---------------|--|---|
| Ottawa | Trade, transportation, and utilities; Leisure and hospitality; Manufacturing; Education and health services; and, Local Government | Benton-Carroll-Salem Local Schools; Brush Wellman Inc/Materion Brush; FirstEnergy Corp/Davis Besse; Luther Home of Mercy; Magruder Hospital; Ottawa County Government; Port Clinton City Schools; USG Corp/US Gypsum Co; and, Wal-Mart Stores Inc |

⁷ RealtyTrac: <http://www.realtytrac.com/statsandrends/foreclosuretrends>

⁸ Ohio Development Services Agency – County Trends:
http://development.ohio.gov/reports/reports_countytrends_map.htm

The following table illustrates the average unemployment rates for 2012, 2013, and 2014 for the counties in the assessment area and Ohio.

| Unemployment Rates Non-metropolitan North Central Ohio (not seasonally adjusted) | | | |
|---|-------------|-------------|----------------|
| Area | 2012 | 2013 | 2014 |
| Crawford County | 9.0 | 8.8 | 5.0 (P) |
| Erie County | 7.5 | 7.5 | 5.2 (P) |
| Huron County | 10.5 | 10.8 | 7.9 (P) |
| Ottawa County | 10.0 | 10.0 | 8.4 (P) |
| Seneca County | 7.5 | 7.3 | 4.5 (P) |
| Ohio | 7.4 | 7.4 | 4.7 (P) |

(P) Preliminary as of December 2014

Unemployment rates declined in all five counties from 2012 to 2014. However, while the unemployment rate in Seneca County was comparable to the average unemployment rate for Ohio, Crawford and Huron Counties experienced unemployment rates higher than those for Ohio.

Combined Demographics Report

Assessment Area(s): Non Metro North Central Ohio 2014

| 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 | 9,924 | 16.9 |
| Moderate-income | 7 | 12.7 | 6,483 | 11.1 | 1,295 | 20 | 10,437 | 17.8 |
| Middle-income | 32 | 58.2 | 35,329 | 60.3 | 3,305 | 9.4 | 12,916 | 22.1 |
| Upper-income | 15 | 27.3 | 16,750 | 28.6 | 1,011 | 6 | 25,285 | 43.2 |
| Unknown-income | 1 | 1.8 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 55 | 100.0 | 58,562 | 100.0 | 5,611 | 9.6 | 58,562 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Moderate-income | 12,576 | 5,980 | 9.5 | 47.6 | 4,605 | 36.6 | 1,991 | 15.8 |
| Middle-income | 59,962 | 38,183 | 60.5 | 63.7 | 13,296 | 22.2 | 8,483 | 14.1 |
| Upper-income | 31,430 | 18,970 | 30 | 60.4 | 4,065 | 12.9 | 8,395 | 26.7 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 103,968 | 63,133 | 100.0 | 60.7 | 21,966 | 21.1 | 18,869 | 18.1 |
| | 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 |
| Moderate-income | 1,237 | 12.5 | 1,085 | 12.2 | 97 | 15.3 | 55 | 13.4 |
| Middle-income | 5,668 | 57.1 | 5,061 | 57 | 380 | 60 | 227 | 55.2 |
| Upper-income | 3,016 | 30.4 | 2,731 | 30.8 | 156 | 24.6 | 129 | 31.4 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 9,921 | 100.0 | 8,877 | 100.0 | 633 | 100.0 | 411 | 100.0 |
| Percentage of Total Businesses: | | | | 89.5 | | 6.4 | | 4.1 |
| | 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 |
| Moderate-income | 15 | 1.5 | 15 | 1.5 | 0 | 0 | 0 | 0 |
| Middle-income | 673 | 66 | 668 | 66 | 5 | 71.4 | 0 | 0 |
| Upper-income | 331 | 32.5 | 329 | 32.5 | 2 | 28.6 | 0 | 0 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 1,019 | 100.0 | 1,012 | 100.0 | 7 | 100.0 | 0 | .0 |
| Percentage of Total Farms: | | | | 99.3 | | .7 | | .0 |

Based on 2013 D&B information according to 2010 ACS boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN NORTH CENTRAL OHIO (2014)

Lending Test

Civista's performance under the lending test in this assessment area is reasonable. Civista has a reasonable geographic distribution of loans in the area, a reasonable distribution among borrowers of different income levels, and an excellent distribution of loans to businesses of different revenue sizes.

Civista originated 87 residential real estate (consisting of 40 home purchase, 27 refinance, 18 home improvement and two multi-family loans), 115 small business, 23 small farm, and two community development loans during the evaluation period. There were not enough small farm loans to conduct a meaningful analysis.

Equal consideration was given to the evaluation of small business loans versus residential real estate loans given the overall volume of lending. Further, less emphasis was placed on geographic distribution of loans due to the fact that there are no low-income geographies and only seven (12.7%) moderate-income geographies designated within the assessment area. Therefore, greater consideration was given to the distribution by borrower income and revenue size of the business.

Details of Civista's residential mortgage and small business lending and lending by peers can be found in Appendix B.

Geographic Distribution

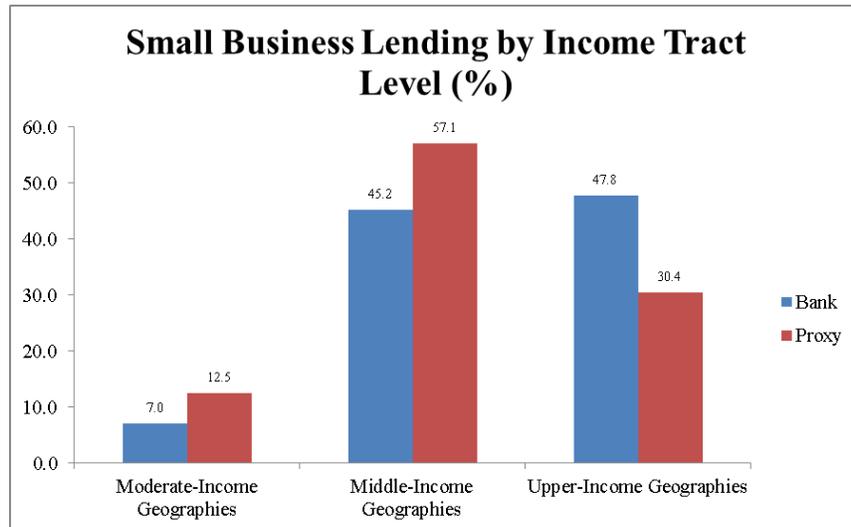
Civista holds a sizeable deposit share of the market and is a leader in mortgage lending, although it faces competition from several large, well-established institutions in this area. Further, many of the top CRA lenders in this market were issuers of high volumes of commercial credit cards that offer small businesses a flexible form of financing, which may have negatively impacted Civista's ability to originate small-dollar commercial loans.

During the evaluation period (2014), Civista originated loans in three of the seven moderate-income tracts within the assessment area. However, when considering the lending in these geographies for the entire evaluation period (January 1, 2012 through September 30, 2014), Civista originated loans in all of the census tracts within the assessment area, with the exception of the unknown-income census tract.

Civista's overall distribution of lending among geographies is reasonable. Small business lending residential real estate lending are both reasonable.

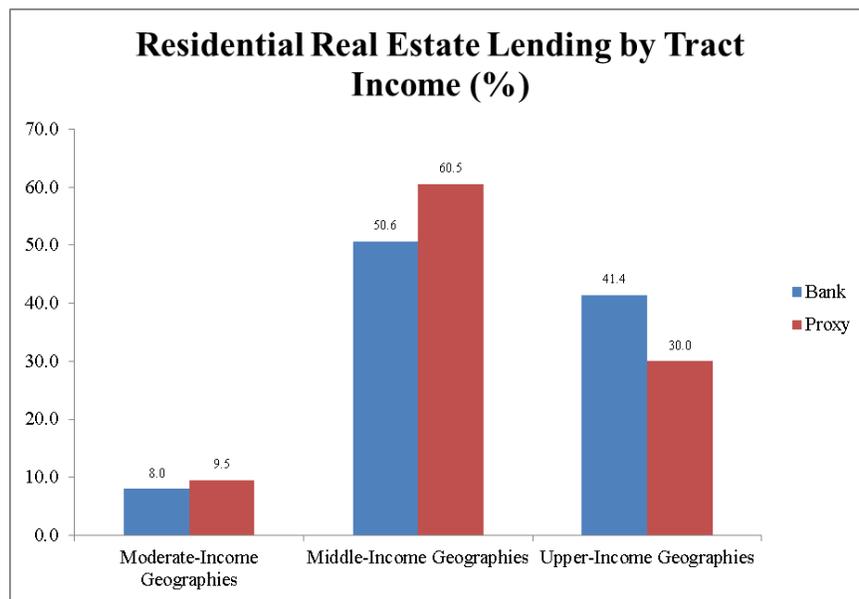
Small Business Lending

As shown in the chart below, small business lending in moderate-income tracts was less than the percentage of small businesses located in moderate-income tracts (proxy). Overall, the geographic distribution of small business lending is reasonable.



Residential Real Estate Loans

As shown in the chart above, residential real estate lending in moderate-income tracts was comparable to the percentage of owner-occupied units (proxy).



There are several factors that may limit Civista’s, ability to originate loans in moderate-income tracts. Rental units comprise 36.6% of all housing units in moderate-income tracts, while only 47.6% of housing units in moderate-income tracts are owner-occupied.

Further, the age of the housing stock at 48 years indicates that prospective homebuyers would need to budget for home improvement and upkeep costs, in addition to mortgage repayment costs. In addition, 20.0% of the families in moderate-income tracts have income below the poverty level and would likely not be able to qualify for any type of mortgage loan.

The distribution of residential real estate loans among middle-income geographies was less than proxy, while distribution in upper-income geographies was higher than proxy.

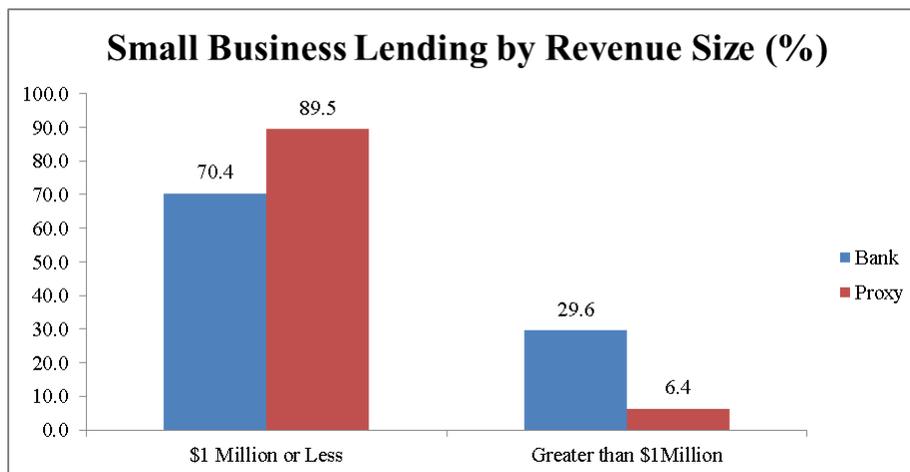
Overall, the geographic distribution of residential real estate lending is reasonable.

Distribution by Borrower Income and Revenue Size of the Business

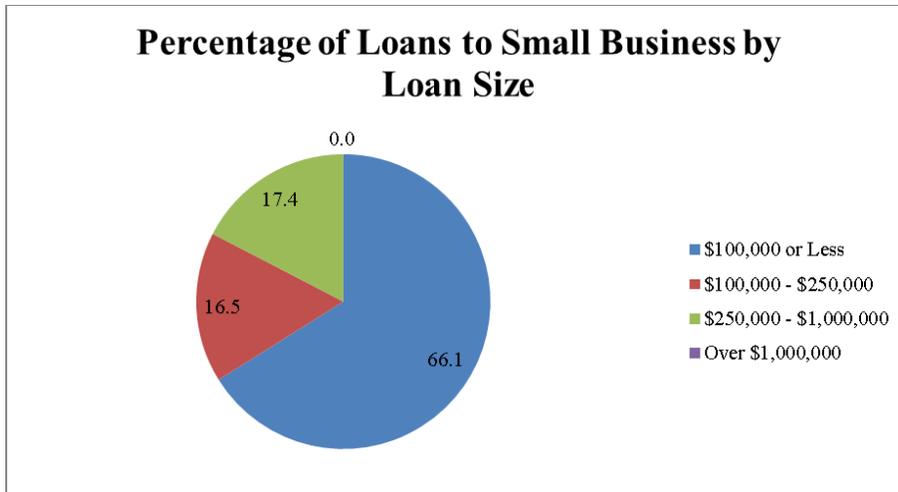
The distribution of loans is reasonable based on borrower’s income and excellent for businesses of different revenue sizes. Most businesses within the bank’s assessment area have annualized revenues less than \$1 million.

Small Business Loans

Civista originated more than 70.0% of small business loans to businesses with annual revenues less than \$1 million, although this was lower than the percentage of small businesses in the assessment area with annual revenues less than \$1 million (proxy).



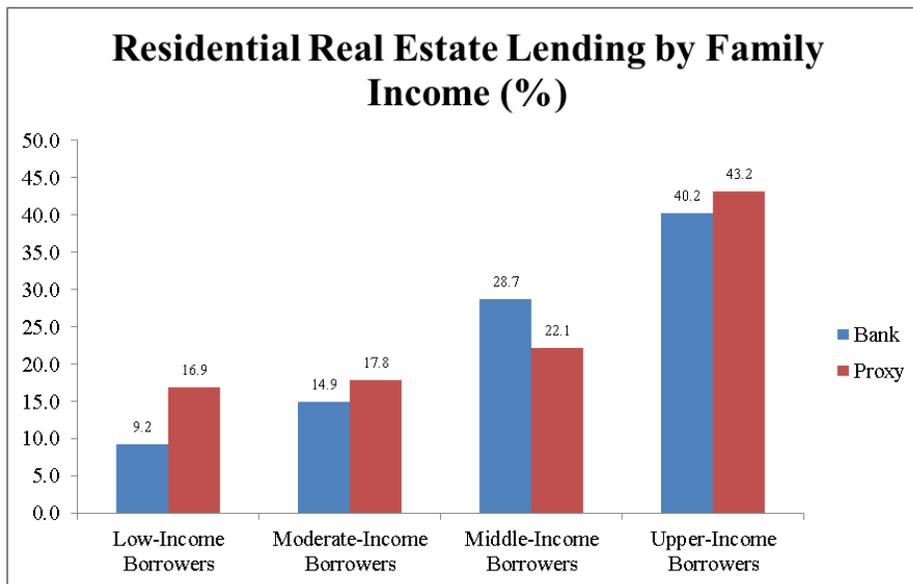
Further analysis of small business lending shows 66.1% of Civista’s small business loans in 2014 were for \$100,000 or less. Typically, the extent to which a bank is willing to extend loans in amounts of \$100,000 or less is reviewed because smaller businesses often have a greater need for small-dollar loans. Given the competition from other financial institutions in the market, this demonstrates an excellent responsiveness to meeting the credit needs of small businesses in the area.



Overall, the distribution of loans based on the revenue size of businesses is excellent.

Residential Real Estate Loans

Residential real estate lending to low-income borrowers was less than the percentage of low-income families in the assessment area (proxy). Residential real estate lending to moderate-income borrowers was slightly lower than proxy, while lending to middle-income families was higher than proxy. The level of residential real estate lending to upper-income borrowers was comparable the percentage of upper-income families in the assessment area (proxy).



As previously mentioned, poverty rates within the assessment area increased significantly in recent years; therefore, it may be difficult for low-income individuals to qualify for loans. Given these poverty rates and affordability ratios, many of the homes within the assessment area were not considered affordable for families below the poverty level. Unemployment rates in Crawford and Huron Counties exceeded the average unemployment rate for Ohio and the nation; therefore, opportunities to lend to low- and moderate-income individuals may be limited.

Overall, the distribution of residential real estate loans to borrowers of different income levels is reasonable.

Community Development Test

Civista demonstrated an adequate level of responsiveness related to community development lending, investments, and services, considering the bank's capacity and the need and availability of such opportunities in the assessment area.

Community Development Loans

In 2014, Civista originated two community development loans totaling \$1.07 million, of which \$1 million supported affordable housing and \$70,000 was for economic development within the assessment area. Community development lending in this assessment area represented 9.3% of the total dollar volume of community development loans originated by the bank during the evaluation period.

Community Development Investments

Civista made one community development investment of \$728,000 in this assessment area during the review period. Eleven donations totaling \$42,342 were made to organizations located in Non-metropolitan North Central Ohio. The donations supported economic development and services that target low- and moderate-income individuals in Crawford, Erie, Huron, and Ottawa Counties.

Community Development Services

As previously in other sections of this performance evaluation, a total of seven employees provided financial expertise to organizations located in Erie, Huron, and Ottawa Counties.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
AKRON, OHIO METROPOLITAN STATISTICAL AREA 10420**
(Limited-scope Review)

The Akron metropolitan statistical area consists of Portage and Summit Counties, while Civista's assessment area only includes 12 census tracts located in Summit County. Of the 12 census tracts in the Akron MSA, one is moderate- (8.3%), three are middle- (25.0%), and eight are upper-income (66.7%).

As of June 30, 2014, Civista ranked 19 of 22 institutions with less than 1.0 of the deposits in the assessment area. Deposits in the assessment area represented 2.7% of the bank's total deposits. Civista operates one branch with a cash-only ATM in this assessment area, which is located in Akron.

Between January 1, 2012 and September 30, 2014, Civista originated nine residential real estate loans and 15 small business loans in the Akron MSA. Based on the bank's lending volume, a limited-scope review was conducted in this assessment area.

One community contact interview with an affordable housing organization in Summit County was conducted to provide additional information regarding the credit needs of the local community and context to the demographic and economic characteristics discussed below. The contact stated that economic conditions have improved as a result of growth in certain sectors such as services, education, and healthcare. The city of Akron was hit very hard by foreclosure, which resulted in a lot of vacant housing and vacant land.

The contact indicated that construction loans are easier to obtain than permanent financing. The contact also stated that many community residents are unable to obtain financing because they do not meet the lenders' criteria or the ability to repay requirements.

Details of the bank's residential mortgage and small business lending and lending by peers can be found in Appendix B.

Combined Demographics Report

Assessment Area(s): Akron Ohio MSA 2014

| 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 | 1,792 | 10.9 |
| Moderate-income | 1 | 8.3 | 1,113 | 6.7 | 135 | 12.1 | 2,485 | 15 |
| Middle-income | 3 | 25 | 4,400 | 26.6 | 294 | 6.7 | 3,477 | 21.1 |
| Upper-income | 8 | 66.7 | 11,001 | 66.6 | 245 | 2.2 | 8,760 | 53 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 12 | 100.0 | 16,514 | 100.0 | 674 | 4.1 | 16,514 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Moderate-income | 1,835 | 1,335 | 7.3 | 72.8 | 294 | 16 | 206 | 11.2 |
| Middle-income | 7,979 | 4,403 | 24.2 | 55.2 | 2,888 | 36.2 | 688 | 8.6 |
| Upper-income | 15,679 | 12,464 | 68.5 | 79.5 | 2,393 | 15.3 | 822 | 5.2 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 25,493 | 18,202 | 100.0 | 71.4 | 5,575 | 21.9 | 1,716 | 6.7 |
| | 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 |
| Moderate-income | 139 | 3.4 | 129 | 3.5 | 2 | 0.7 | 8 | 6.1 |
| Middle-income | 894 | 21.6 | 809 | 21.9 | 51 | 16.8 | 34 | 25.8 |
| Upper-income | 3,100 | 75 | 2,760 | 74.6 | 250 | 82.5 | 90 | 68.2 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 4,133 | 100.0 | 3,698 | 100.0 | 303 | 100.0 | 132 | 100.0 |
| Percentage of Total Businesses: | | | | 89.5 | | 7.3 | | 3.2 |
| | 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 |
| Moderate-income | 1 | 2.1 | 0 | 0 | 1 | 100 | 0 | 0 |
| Middle-income | 10 | 21.3 | 10 | 21.7 | 0 | 0 | 0 | 0 |
| Upper-income | 36 | 76.6 | 36 | 78.3 | 0 | 0 | 0 | 0 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 47 | 100.0 | 46 | 100.0 | 1 | 100.0 | 0 | .0 |
| Percentage of Total Farms: | | | | 97.9 | | 2.1 | | .0 |

Based on 2013 D&B information according to 2010 ACS boundaries.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
AKRON, OHIO METROPOLITAN STATISTICAL AREA 10420**

Lending activity in this assessment area is below Civista's overall lending and community development performance.

During the evaluation period, Civista originated loans in a majority of the census tracts within the assessment area; however, significant lending gaps were noted. While the bank made at least one loan in eight of the twelve census tracts (66.7%), it did not originate any loans in the one moderate-income or two of the three middle-income tracts located within the assessment area.

Civista has a reasonable distribution of loans among geographies, but has a poor distribution of loans based on borrower income levels and a reasonable distribution of loans to businesses of different revenue sizes.

Civista did not originate any community development loans, generate any community development investments, or provide community development services within this assessment area. Although Civista has a limited presence and branch structure in the area, this demonstrates a poor responsiveness to the community development needs of this assessment area.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
COLUMBUS, OHIO METROPOLITAN STATISTICAL AREA 18140**
(Limited-scope Review)

The Columbus metropolitan statistical area consists of ten counties in central Ohio, while the bank's assessment area includes 23 tracts in Franklin County, three tracts in Delaware County, and two tracts in Madison County. Of the 28 census tracts in the Columbus MSA, one is moderate- (3.6%), nine are middle- (32.1%), and 18 are upper-income (64.3%).

As of June 30, 2014, Civista ranked 31 of 41 institutions with less than 1.0% of the deposits in the assessment area. Deposits in the assessment area represented 4.1% of the bank's total deposits. Civista operated three branches in this assessment area until June 6, 2014, at which time it closed a branch in Hilliard, Ohio (a middle-income tract). Branches in Plain City (a middle-income tract) and Dublin (an upper-income tract) remain open.

Between January 1, 2012 and September 30, 2014, Civista originated 39 residential real estate loans and 40 small business loans in the Akron MSA. Based on the bank's lending volume, a limited-scope review was conducted in this assessment area.

Details of the bank's residential mortgage and small business lending and lending by peers can be found in Appendix B.

Combined Demographics Report

Assessment Area(s): Columbus MSA 2014

| 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 | 4,445 | 10.4 |
| Moderate-income | 1 | 3.6 | 1,904 | 4.5 | 336 | 17.6 | 5,003 | 11.8 |
| Middle-income | 9 | 32.1 | 12,671 | 29.8 | 1,066 | 8.4 | 8,153 | 19.2 |
| Upper-income | 18 | 64.3 | 27,962 | 65.7 | 769 | 2.8 | 24,936 | 58.6 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 28 | 100.0 | 42,537 | 100.0 | 2,171 | 5.1 | 42,537 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Moderate-income | 3,459 | 1,426 | 3.3 | 41.2 | 1,824 | 52.7 | 209 | 6 |
| Middle-income | 22,725 | 12,121 | 28.3 | 53.3 | 8,749 | 38.5 | 1,855 | 8.2 |
| Upper-income | 42,815 | 29,214 | 68.3 | 68.2 | 11,130 | 26 | 2,471 | 5.8 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 68,999 | 42,761 | 100.0 | 62.0 | 21,703 | 31.5 | 4,535 | 6.6 |
| | 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 |
| Moderate-income | 363 | 4.6 | 294 | 4.3 | 51 | 7.8 | 18 | 6 |
| Middle-income | 2,019 | 25.8 | 1,791 | 26.1 | 152 | 23.2 | 76 | 25.2 |
| Upper-income | 5,448 | 69.6 | 4,789 | 69.7 | 451 | 69 | 208 | 68.9 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 7,830 | 100.0 | 6,874 | 100.0 | 654 | 100.0 | 302 | 100.0 |
| Percentage of Total Businesses: | | | | 87.8 | | 8.4 | | 3.9 |
| | 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 |
| Moderate-income | 2 | 1.8 | 2 | 1.8 | 0 | 0 | 0 | 0 |
| Middle-income | 72 | 63.7 | 72 | 64.3 | 0 | 0 | 0 | 0 |
| Upper-income | 39 | 34.5 | 38 | 33.9 | 1 | 100 | 0 | 0 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 113 | 100.0 | 112 | 100.0 | 1 | 100.0 | 0 | .0 |
| Percentage of Total Farms: | | | | 99.1 | | .9 | | .0 |

Based on 2014 D&B information according to 2010 ACS boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLUMBUS, OHIO METROPOLITAN STATISTICAL AREA 18140

Lending activity in this assessment area is consistent with Civista's overall lending performance and community development is above the performance.

During the evaluation period, Civista originated loans in a majority of the census tracts within the assessment area. However, lending gaps were noted in one of 11 middle- and four of 16 upper-income tracts located within the assessment area.

Civista has a reasonable distribution of loans among geographies. Civista also has a reasonable distribution of loans based on borrower income levels and a reasonable distribution of loans to businesses of different revenue sizes.

Given its limited presence, Civista demonstrated an excellent responsiveness to the community development needs of this assessment area. Within the Columbus MSA, Civista received partial credit of \$1.25 million for community development lending that promoted economic development in the assessment area. This represented 10.8% of Civista's community development lending for the evaluation period. No community development investments were made; however, three employees provided financial expertise to organizations located in Franklin County.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
MANSFIELD, OHIO METROPOLITAN STATISTICAL AREA 31900**
(Limited-scope Review)

The Mansfield MSA consists of Richland County, Ohio in its entirety, while Civista's assessment area includes 30 tracts in the northern and central portions of the county. Of the 30 census tracts in the Mansfield MSA, 11 are moderate- (36.7%), 13 are middle- (43.3%), and six are upper-income (20.0%).

As of June 30, 2014, Civista ranked sixth of fourteen institutions, with 6.3% of the deposits in the assessment area. Deposits in the assessment area represented 10.9% of the bank's total deposits.

Civista operated four branches in this assessment area until August 8, 2014, at which time a branch in Shelby, Ohio (middle-income tract) was closed. Two other branches remain open in Shelby, as well as a branch in Shiloh, Ohio. Civista operates a cash-only ATM in Shelby, but closed a cash-only ATM in Crestline, Ohio, which was located in an upper-income tract.

Between January 1, 2012 and September 30, 2014, Civista originated 57 residential real estate, 55 small business, and 34 small farm loans in the Mansfield MSA. Based on the bank's lending volume, a limited-scope review was conducted in this assessment area.

Details of the bank's residential mortgage and small business lending and lending by peers can be found in Appendix B.

Combined Demographics Report

Assessment Area(s): Mansfield MSA 2014

| 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 | 6,031 | 18.4 |
| Moderate-income | 11 | 36.7 | 7,187 | 21.9 | 1,347 | 18.7 | 6,734 | 20.5 |
| Middle-income | 13 | 43.3 | 16,199 | 49.3 | 1,144 | 7.1 | 7,082 | 21.6 |
| Upper-income | 6 | 20 | 9,458 | 28.8 | 330 | 3.5 | 12,997 | 39.6 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 30 | 100.0 | 32,844 | 100.0 | 2,821 | 8.6 | 32,844 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Moderate-income | 15,785 | 6,930 | 20 | 43.9 | 5,703 | 36.1 | 3,152 | 20 |
| Middle-income | 25,265 | 17,167 | 49.6 | 67.9 | 6,092 | 24.1 | 2,006 | 7.9 |
| Upper-income | 13,707 | 10,491 | 30.3 | 76.5 | 2,174 | 15.9 | 1,042 | 7.6 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 54,757 | 34,588 | 100.0 | 63.2 | 13,969 | 25.5 | 6,200 | 11.3 |
| | 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 |
| Moderate-income | 1,451 | 27.4 | 1,224 | 25.8 | 158 | 47.9 | 69 | 32.1 |
| Middle-income | 2,355 | 44.5 | 2,147 | 45.2 | 115 | 34.8 | 93 | 43.3 |
| Upper-income | 1,489 | 28.1 | 1,379 | 29 | 57 | 17.3 | 53 | 24.7 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 5,295 | 100.0 | 4,750 | 100.0 | 330 | 100.0 | 215 | 100.0 |
| Percentage of Total Businesses: | | | | 89.7 | | 6.2 | | 4.1 |
| | 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 |
| Moderate-income | 8 | 2.5 | 8 | 2.5 | 0 | 0 | 0 | 0 |
| Middle-income | 208 | 65.4 | 207 | 65.5 | 1 | 50 | 0 | 0 |
| Upper-income | 102 | 32.1 | 101 | 32 | 1 | 50 | 0 | 0 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 318 | 100.0 | 316 | 100.0 | 2 | 100.0 | 0 | .0 |
| Percentage of Total Farms: | | | | 99.4 | | .6 | | .0 |

Based on 2013 D&B information according to 2010 ACS boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MANSFIELD, OHIO METROPOLITAN STATISTICAL AREA 31900

Lending activity in this assessment area is below Civista's overall lending and community development performance.

During the evaluation period, Civista originated loans in 21 of 30 census tracts within the assessment area. Significant lending gaps were noted in moderate-income tracts, as Civista did not originate loans in six of the 11 moderate-income tracts.

Civista's distribution of lending among geographies is reasonable. The percentage of Civista residential real estate lending in moderate income tracts (5.3%) was less than the percentage of owner-occupied units (20.0%). Similarly, small business lending in moderate-income tracts was less than the percentage of small businesses located in moderate-income tracts (proxy).

A number of other factors can limit the ability of lenders to originate loans in moderate-income tracts. The age of the housing stock at 49 years in the moderate-income tract indicates that prospective homebuyers would need to budget for home improvement and upkeep costs, in addition to mortgage repayment costs. In addition, 18.7% of the families in moderate-income tracts have income below the poverty level and would likely not be able to qualify for any type of mortgage loan. Further, only 20.0% of all owner-occupied units are located in moderate-income tracts, while 36.1% of all housing units in moderate-income tracts are rental housing units.

Civista has a reasonable distribution of loans based on borrower income levels. Residential real estate lending to low-income borrowers (10.5%) was lower than the percentage of low-income families (18.4%), while lending to moderate-income borrowers was comparable to proxy and peer. However, it may be difficult for low-income individuals to qualify for loans, given that poverty rates within the assessment area increased significantly in recent years. Further, the increased age of housing stock means that prospective buyers would need to budget for home improvement and upkeep costs, in addition to mortgage repayment costs.

The distribution of loans to businesses of different revenue sizes is excellent. Most businesses within the bank's assessment area have annualized revenues less than \$1 million. Civista originated 94.9% small business loans to businesses with annual revenues less than \$1 million.

Civista did not originate any community development loans within this assessment area during the evaluation period nor make any community development investments in the Mansfield MSA. However, it did provide financial literacy education at one school with a majority of low- and moderate-income students. Although, Civista has a limited presence in the area, this demonstrates a poor responsiveness to the community development needs of this assessment area.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
TOLEDO, OHIO METROPOLITAN STATISTICAL AREA 45780 (2012-2013)**
(Limited-scope Review)

In 2012 and 2013, Civista's Toledo MSA included eight census tracts located in eastern Ottawa County, of which five are middle- (62.5%), and three are upper-income (37.5%). There are no low- or moderate-income tracts within this assessment area.

For the purposes of reviewing Civista's lending performance in 2012 and 2013, Ottawa County was part of the Toledo MSA, along with Fulton, Lucas, and Wood Counties. However, based on updated census data for the area, the OMB removed Ottawa County from the Toledo MSA in 2013. As such, Civista's 2014 lending performance in Ottawa County was considered as part of the Non-metropolitan North Central Ohio assessment area.

As of June 30, 2013, Civista ranked eleventh of twelve institutions with less than 1.0% of the deposits in the assessment area. Civista operates one branch and one cash-only ATM in Port Clinton, Ohio.

Between January 1, 2012 and December 31, 2013, Civista originated 29 residential real estate and 39 small business loans in the Toledo MSA. Based on the bank's lending volume, a limited-scope review was conducted in this assessment area. Further, greater consideration was given to the distribution by borrower income and revenue size of businesses due to the fact that there are no low- or moderate-income geographies in the assessment area.

Details of the bank's residential mortgage and small business lending and lending by peers can be found in Appendix B.

Combined Demographics Report

Assessment Area(s): Toledo MSA 2013

| 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 | 1,035 | 17.4 |
| Moderate-income | 0 | 0 | 0 | 0 | 0 | 0 | 1,153 | 19.4 |
| Middle-income | 5 | 62.5 | 4,655 | 78.2 | 357 | 7.7 | 1,301 | 21.8 |
| Upper-income | 3 | 37.5 | 1,300 | 21.8 | 51 | 3.9 | 2,466 | 41.4 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 8 | 100.0 | 5,955 | 100.0 | 408 | 6.9 | 5,955 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Moderate-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Middle-income | 12,563 | 5,568 | 78.7 | 44.3 | 1,590 | 12.7 | 5,405 | 43 |
| Upper-income | 5,016 | 1,511 | 21.3 | 30.1 | 370 | 7.4 | 3,135 | 62.5 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 17,579 | 7,079 | 100.0 | 40.3 | 1,960 | 11.1 | 8,540 | 48.6 |
| | 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 |
| Moderate-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Middle-income | 1,072 | 77.3 | 963 | 77.3 | 58 | 81.7 | 51 | 73.9 |
| Upper-income | 314 | 22.7 | 283 | 22.7 | 13 | 18.3 | 18 | 26.1 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 1,386 | 100.0 | 1,246 | 100.0 | 71 | 100.0 | 69 | 100.0 |
| Percentage of Total Businesses: | | | | 89.9 | | 5.1 | | 5.0 |
| | Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | # |
| Low-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Moderate-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Middle-income | 27 | 87.1 | 27 | 87.1 | 0 | 0 | 0 | 0 |
| Upper-income | 4 | 12.9 | 4 | 12.9 | 0 | 0 | 0 | 0 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 31 | 100.0 | 31 | 100.0 | 0 | .0 | 0 | .0 |
| Percentage of Total Farms: | | | | 100.0 | | .0 | | .0 |

Based on 2013 D&B information according to 2010 ACS boundaries.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
TOLEDO, OHIO METROPOLITAN STATISTICAL AREA 45780 (2012-2013)**

Lending activity in this assessment area is below Civista's overall lending and community development performance.

During the evaluation period, Civista originated loans in all census tracts within the assessment area.

Civista has a reasonable distribution of loans among geographies. While Civista has a poor distribution of loans based on borrower income levels, its distribution of loans to businesses of different revenue sizes is reasonable.

Civista made one community development investment of \$1.012 million within this assessment area in 2013 and did not originate any community development loans. As previously discussed under non-MSA North Central Ohio (2014), two employees provided financial expertise services to two organizations in Ottawa County. Overall, this demonstrates an adequate responsiveness to the community development needs of this assessment area.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
NON-METROPOLITAN WEST CENTRAL OHIO**
(Limited-scope Review)

The Non-metropolitan West Central Ohio assessment area consists of the entirety of Champaign and Logan Counties. Overall, the assessment area consists of 21 census tracts, of which four are moderate- (19.0%), ten are middle- (47.6%), and seven are upper-income tracts (33.3%). There are no low-income census tracts nor any distressed or underserved tracts in this assessment area.

As of June 30, 2014, Civista ranked second of twelve institutions, with 12.4% of the deposits in the assessment area. Deposits in the assessment area represented 15.6% of the bank's total deposits. Civista operates three offices and two standalone ATMs in Champaign County and two offices in Logan County.

Between January 1, 2012 and September 30, 2014, Civista originated 86 residential real estate, 59 small business, and 86 small farm loans in the Non-metropolitan West Central Ohio assessment area. Based on the bank's lending volume, a limited-scope review was conducted in this assessment area.

Two community contact interviews were conducted to provide additional information regarding the credit needs of the local community and context to the demographic and economic characteristics discussed below. The first interview was conducted with an economic development organization in Champaign County. The contact described local economic conditions as "slowly improving" and adding that the area was hit hard during the recession, particularly in the automotive industry, which is improving. The contact also shared that agriculture remains strong and local farmers are doing well, but it is doubtful that the farming economy will remain strong indefinitely. Despite the growth in small businesses, lending remains conservative as underwriting standards have tightened with local borrowers. Further, the contact stated that the local residential real estate market was greatly affected during the last downturn and residential real estate prices are improving, while the rate of foreclosures has slowed considerably.

The second community contact is involved with meeting housing needs for low- and moderate-income families in Logan County. The contact indicated that the overall economic condition of Logan County is good, due to the impact of a large automotive assembly plant just outside the county and the many suppliers to the plant that locate throughout the region. Housing is readily available for all income levels. While affordable housing is available to low- and moderate-income borrowers, such properties often require immediate repairs to become habitable. The contact noted that generally, low- and moderate-income individuals lack discretionary funds to make the repairs.

Details of the bank's residential mortgage and small business lending and lending by peers can be found in Appendix B.

Combined Demographics Report

Assessment Area(s): Non Metro West Central Ohio 2014

| 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 | 4,479 | 18.9 |
| Moderate-income | 4 | 19 | 4,176 | 17.6 | 875 | 21 | 3,840 | 16.2 |
| Middle-income | 10 | 47.6 | 12,103 | 51.2 | 1,166 | 9.6 | 5,261 | 22.2 |
| Upper-income | 7 | 33.3 | 7,382 | 31.2 | 463 | 6.3 | 10,081 | 42.6 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 21 | 100.0 | 23,661 | 100.0 | 2,504 | 10.6 | 23,661 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Moderate-income | 7,725 | 3,560 | 14.3 | 46.1 | 2,937 | 38 | 1,228 | 15.9 |
| Middle-income | 21,132 | 12,965 | 52.2 | 61.4 | 3,987 | 18.9 | 4,180 | 19.8 |
| Upper-income | 11,038 | 8,310 | 33.5 | 75.3 | 1,800 | 16.3 | 928 | 8.4 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 39,895 | 24,835 | 100.0 | 62.3 | 8,724 | 21.9 | 6,336 | 15.9 |
| | 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 |
| Moderate-income | 694 | 19.5 | 608 | 18.8 | 50 | 28.9 | 36 | 23.8 |
| Middle-income | 1,809 | 50.9 | 1,643 | 50.9 | 84 | 48.6 | 82 | 54.3 |
| Upper-income | 1,052 | 29.6 | 980 | 30.3 | 39 | 22.5 | 33 | 21.9 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 3,555 | 100.0 | 3,231 | 100.0 | 173 | 100.0 | 151 | 100.0 |
| Percentage of Total Businesses: | | | | 90.9 | | 4.9 | | 4.2 |
| | 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 |
| Moderate-income | 22 | 3.5 | 22 | 3.5 | 0 | 0 | 0 | 0 |
| Middle-income | 338 | 53.7 | 333 | 53.5 | 5 | 62.5 | 0 | 0 |
| Upper-income | 270 | 42.9 | 267 | 42.9 | 3 | 37.5 | 0 | 0 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 630 | 100.0 | 622 | 100.0 | 8 | 100.0 | 0 | .0 |
| Percentage of Total Farms: | | | | 98.7 | | 1.3 | | .0 |

Based on 2013 D&B information according to 2010 ACS boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN WEST CENTRAL OHIO

Lending activity in this assessment area is consistent with Civista's overall lending performance and community development is above the performance.

During the evaluation period, Civista originated loans in three of four moderate-income tracts and nine of ten middle-income tracts located within the assessment area.

Civista has an excellent distribution of loans among geographies. Distribution of loans based on borrower income levels and loans to businesses of different revenue sizes are reasonable.

Within the Non-metropolitan West Central Ohio assessment area, Civista originated one community development loan (\$500,000) for community services and received partial credit of \$1.25 million for community development lending that promoted economic development in the assessment area. This represented 15.2% of Civista's community development lending for the evaluation period.

The Non-metropolitan West Central Ohio assessment area received credit for \$197,534 in investments to the Ohio Equity Fund based on the amount of funding designated to finance an affordable housing project located in Huron County.

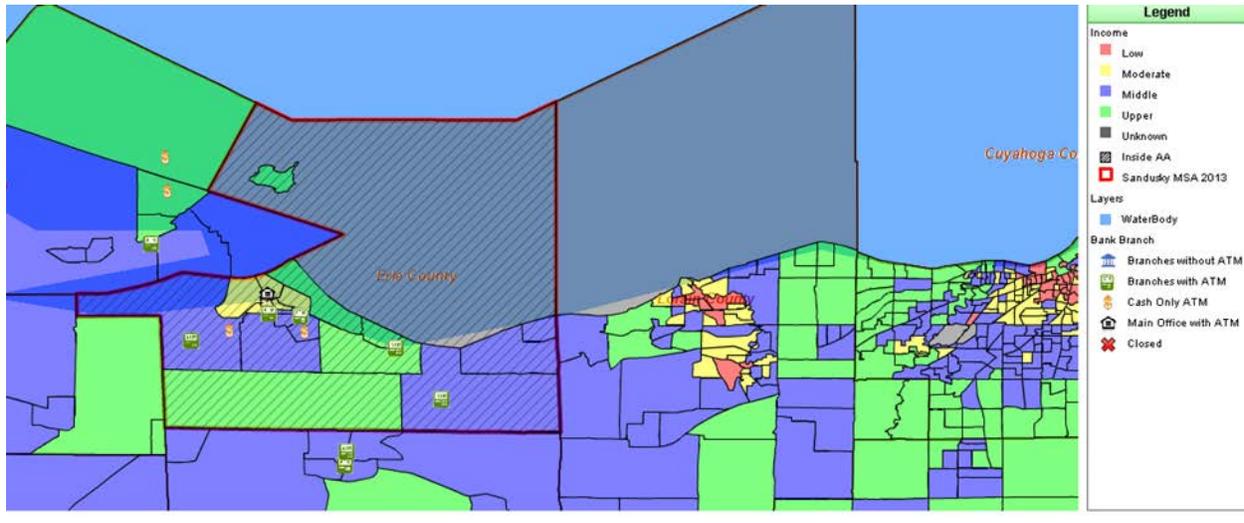
One employee provided financial expertise to an organization located in the Non-metropolitan West Central Ohio assessment area.

Overall, Civista demonstrated an excellent responsiveness to the community development needs of this assessment area.

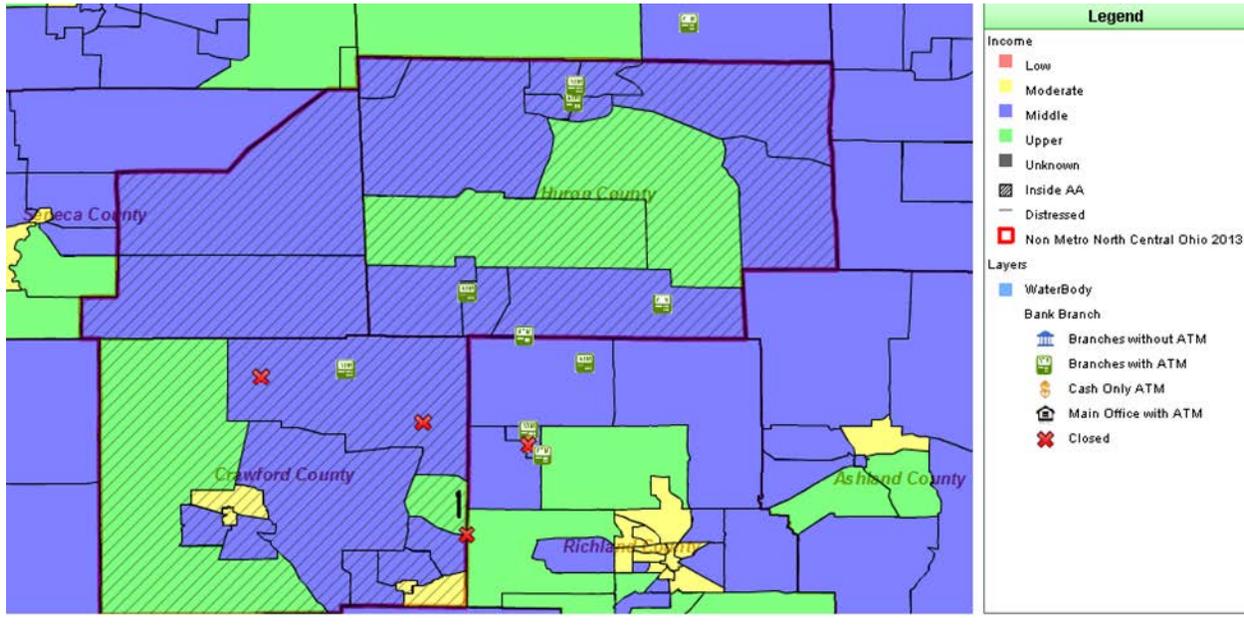
APPENDIX A

ASSESSMENT AREA MAPS

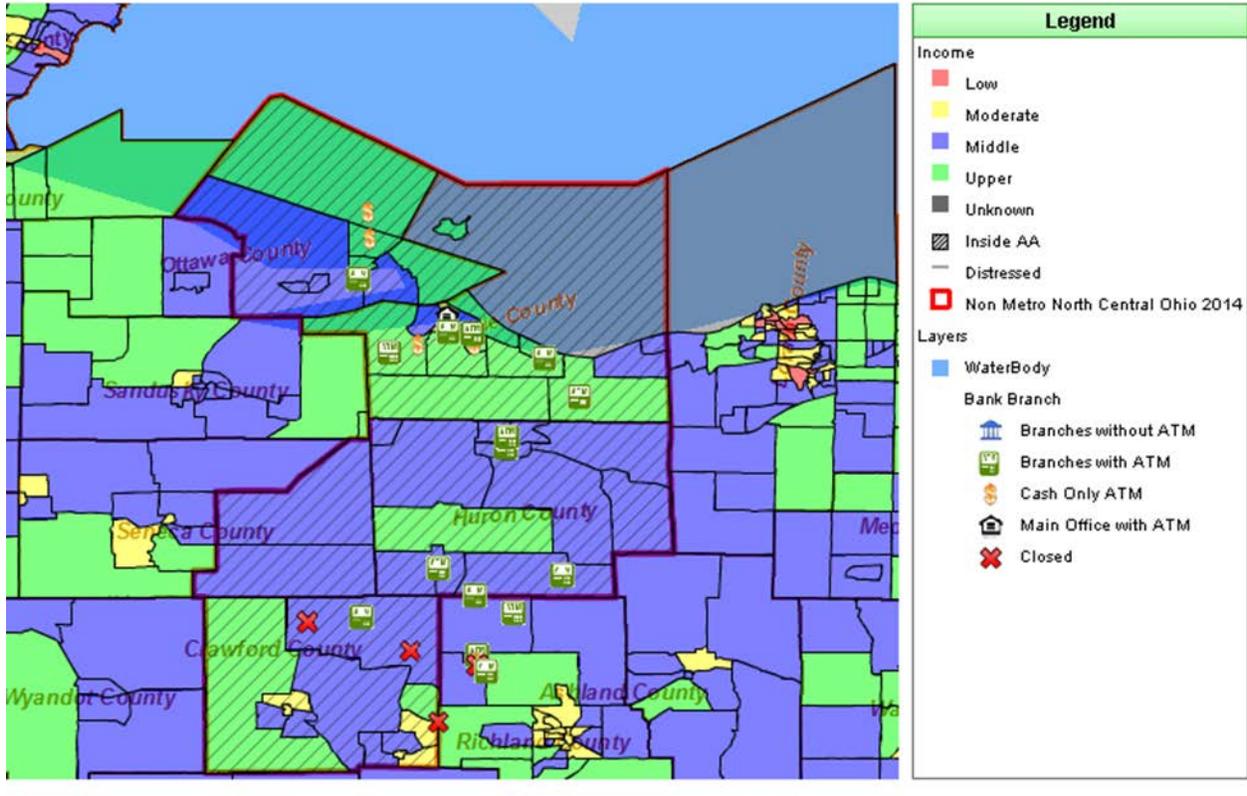
Sandusky, OH MSA (2012-2013)



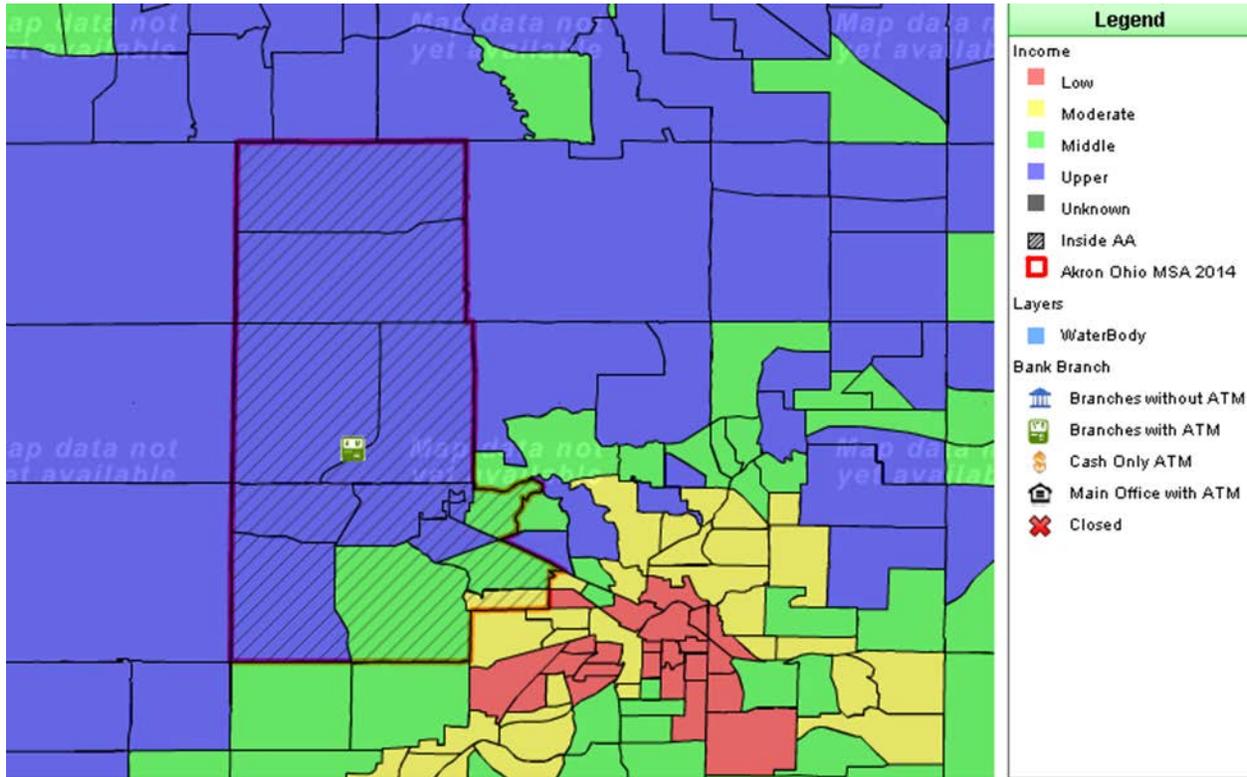
Non-Metropolitan North Central Ohio (2012-2013)



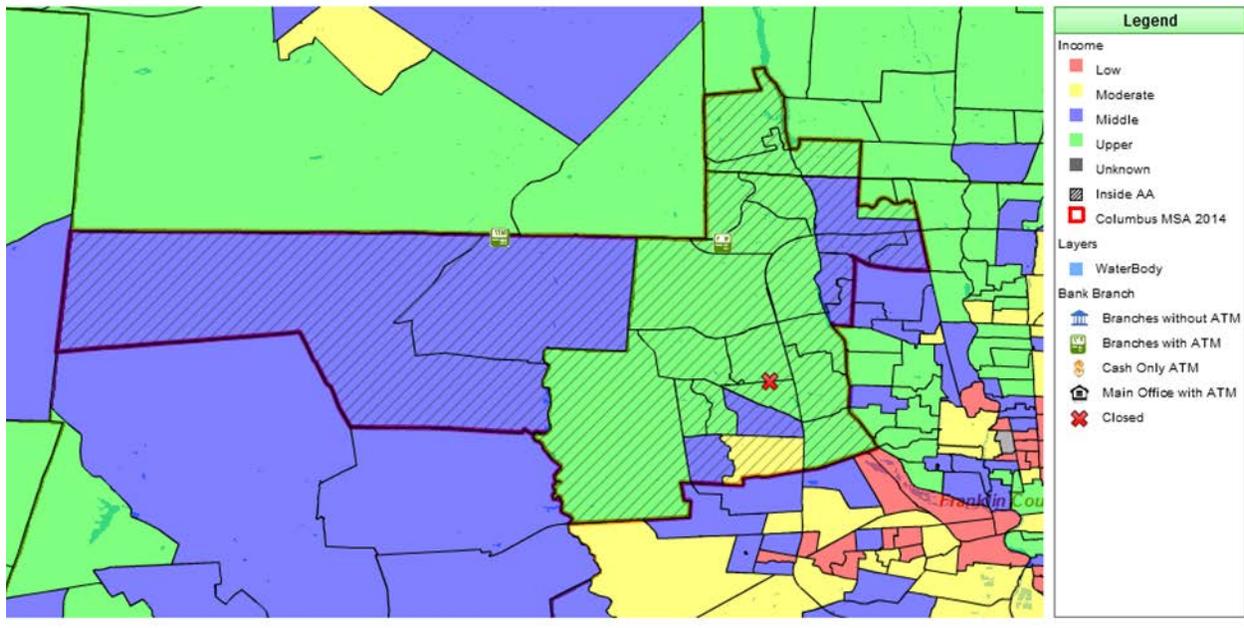
Non-metropolitan North Central Ohio (2014)



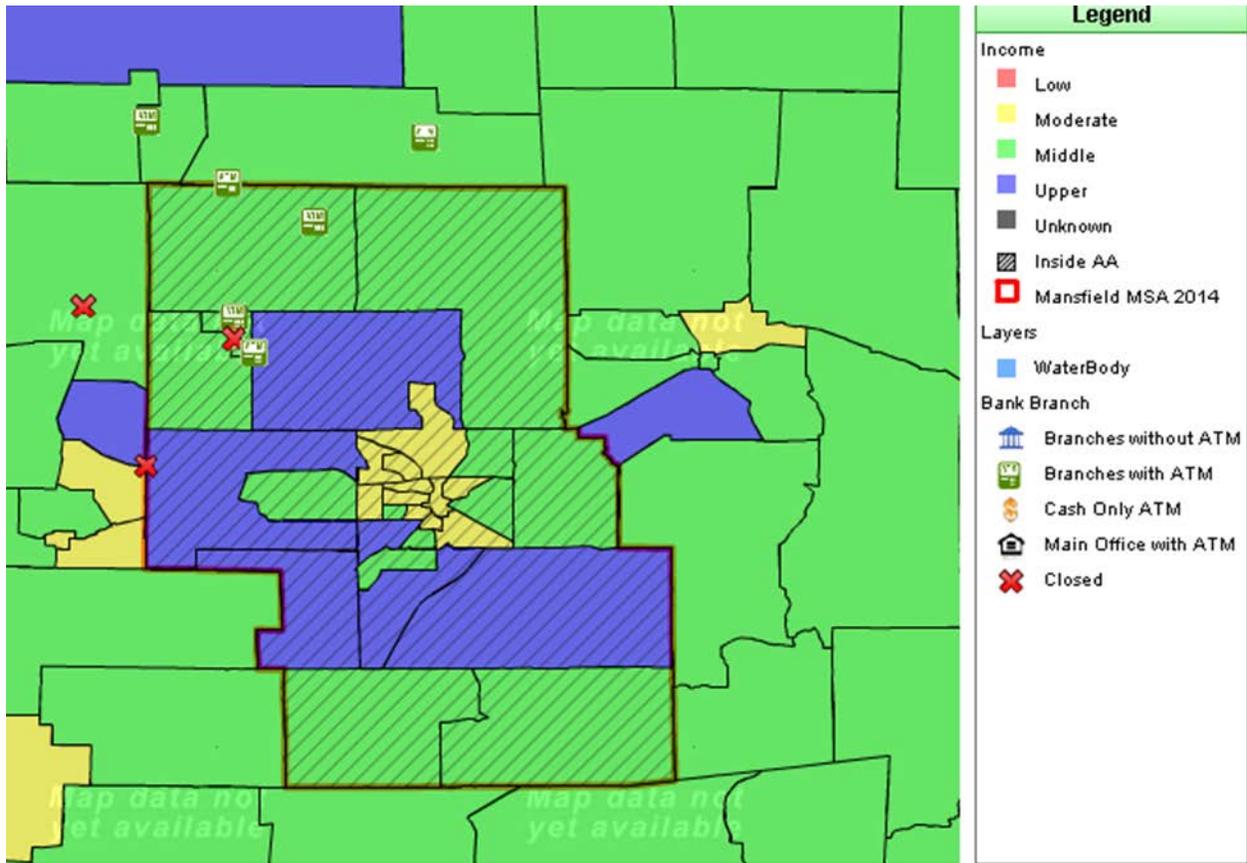
Akron, OH MSA



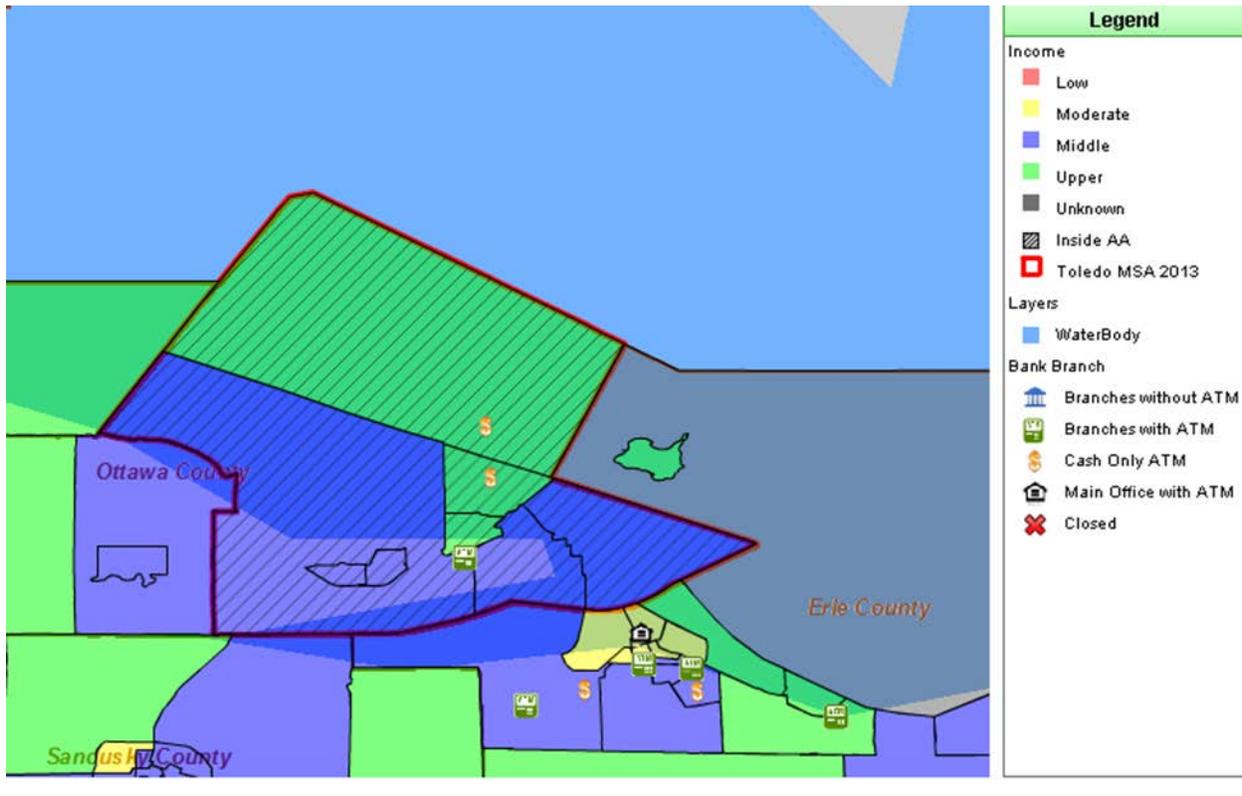
Columbus, OH MSA



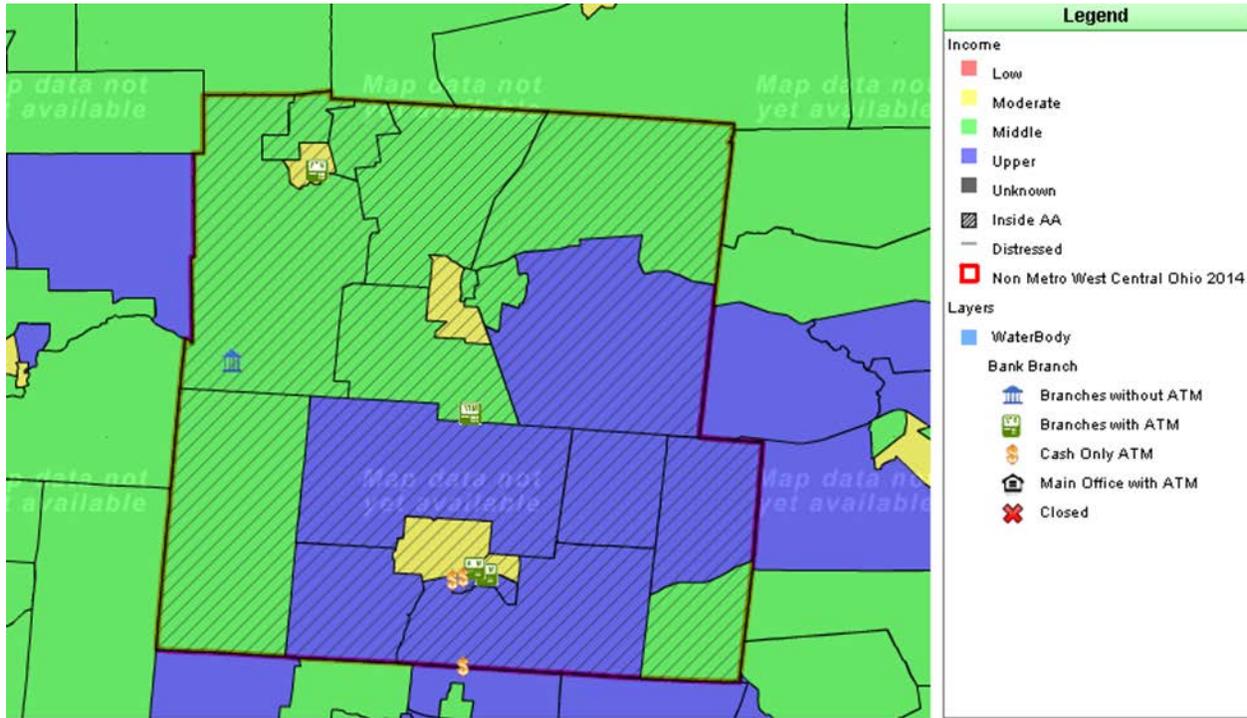
Mansfield, OH MSA



Toledo, OH MSA (2012-2013)



Non-metropolitan West Central Ohio



APPENDIX B

LENDING TABLES

HMDA Loan Distribution Table

Assessment Area/Group :Sandusky MSA - 2012, 2013

| Income Categories | HMDA | | | | | | | |
|-------------------------|------|-----------------|--------|--------|-----|--------------------|--------|--------|
| | # | By Tract Income | | | # | By Borrower Income | | |
| % | | \$(000s) | % | % | | \$(000s) | % | |
| Home Purchase | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 10 | 11.1% | 517 | 4.0% |
| Moderate | 14 | 15.6% | 853 | 6.7% | 11 | 12.2% | 1,007 | 7.9% |
| Low/Moderate Total | 14 | 15.6% | 853 | 6.7% | 21 | 23.3% | 1,524 | 11.9% |
| Middle | 41 | 45.6% | 5,054 | 39.5% | 17 | 18.9% | 1,538 | 12.0% |
| Upper | 35 | 38.9% | 6,894 | 53.9% | 51 | 56.7% | 9,489 | 74.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1 | 1.1% | 250 | 2.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 90 | 100.0% | 12,801 | 100.0% | 90 | 100.0% | 12,801 | 100.0% |
| Refinance | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 17 | 8.4% | 1,069 | 3.6% |
| Moderate | 42 | 20.8% | 4,246 | 14.2% | 32 | 15.8% | 2,777 | 9.3% |
| Low/Moderate Total | 42 | 20.8% | 4,246 | 14.2% | 49 | 24.3% | 3,846 | 12.9% |
| Middle | 95 | 47.0% | 11,850 | 39.6% | 46 | 22.8% | 4,935 | 16.5% |
| Upper | 65 | 32.2% | 13,833 | 46.2% | 104 | 51.5% | 20,873 | 69.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 3 | 1.5% | 275 | 0.9% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 202 | 100.0% | 29,929 | 100.0% | 202 | 100.0% | 29,929 | 100.0% |
| Home Improvement | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5 | 11.9% | 17 | 0.9% |
| Moderate | 17 | 40.5% | 492 | 25.5% | 9 | 21.4% | 210 | 10.9% |
| Low/Moderate Total | 17 | 40.5% | 492 | 25.5% | 14 | 33.3% | 227 | 11.8% |
| Middle | 20 | 47.6% | 911 | 47.2% | 8 | 19.0% | 190 | 9.8% |
| Upper | 5 | 11.9% | 526 | 27.3% | 16 | 38.1% | 1,298 | 67.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 4 | 9.5% | 214 | 11.1% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 42 | 100.0% | 1,929 | 100.0% | 42 | 100.0% | 1,929 | 100.0% |
| Multi-Family | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 2 | 50.0% | 760 | 51.5% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 2 | 50.0% | 760 | 51.5% | 0 | 0.0% | 0 | 0.0% |
| Middle | 1 | 25.0% | 415 | 28.1% | 0 | 0.0% | 0 | 0.0% |
| Upper | 1 | 25.0% | 300 | 20.3% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 4 | 100.0% | 1,475 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 4 | 100.0% | 1,475 | 100.0% | 4 | 100.0% | 1,475 | 100.0% |
| HMDA Totals | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 32 | 9.5% | 1,603 | 3.5% |
| Moderate | 75 | 22.2% | 6,351 | 13.8% | 52 | 15.4% | 3,994 | 8.7% |
| Low/Moderate Total | 75 | 22.2% | 6,351 | 13.8% | 84 | 24.9% | 5,597 | 12.1% |
| Middle | 157 | 46.4% | 18,230 | 39.5% | 71 | 21.0% | 6,663 | 14.4% |
| Upper | 106 | 31.4% | 21,553 | 46.7% | 171 | 50.6% | 31,660 | 68.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 12 | 3.6% | 2,214 | 4.8% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 338 | 100.0% | 46,134 | 100.0% | 338 | 100.0% | 46,134 | 100.0% |

*Information based on 2010 ACS data

CRA Loan Distribution Table

Assessment Area/Group: Sandusky MSA - 2012, 2013

| Income Categories | SMALL BUSINESS | | | | SMALL FARM | | | | SMALL BUS. SECURED BY REAL ESTATE | | | |
|---|----------------|--------|----------|--------|------------|--------|----------|--------|-----------------------------------|------|----------|------|
| | # | % | \$(000s) | % | # | % | \$(000s) | % | # | % | \$(000s) | % |
| By Tract Income | | | | | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 90 | 39.0% | 13,227 | 33.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 90 | 39.0% | 13,227 | 33.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Middle | 82 | 35.5% | 16,413 | 41.1% | 8 | 57.1% | 788 | 60.8% | 0 | 0.0% | 0 | 0.0% |
| Upper | 59 | 25.5% | 10,239 | 25.9% | 6 | 42.9% | 508 | 39.2% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 231 | 100.0% | 39,979 | 100.0% | 14 | 100.0% | 1,296 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Revenue | | | | | | | | | | | | |
| Total \$1 Million or Less | 147 | 63.6% | 18,807 | 47.0% | 10 | 71.4% | 690 | 53.2% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million | 84 | 36.4% | 21,172 | 53.0% | 4 | 28.6% | 606 | 46.8% | 0 | 0.0% | 0 | 0.0% |
| Not Known | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 231 | 100.0% | 39,979 | 100.0% | 14 | 100.0% | 1,296 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size | | | | | | | | | | | | |
| \$100,000 or less | 121 | 52.4% | 5,000 | 12.5% | 9 | 64.3% | 380 | 29.3% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 62 | 26.8% | 10,344 | 25.9% | 4 | 28.6% | 616 | 47.5% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 48 | 20.8% | 24,635 | 61.6% | 1 | 7.1% | 300 | 23.1% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 231 | 100.0% | 39,979 | 100.0% | 14 | 100.0% | 1,296 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size and Revenue \$1 Million or Less | | | | | | | | | | | | |
| \$100,000 or less | 89 | 60.5% | 3,317 | 17.6% | 8 | 80.0% | 340 | 49.3% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 39 | 26.5% | 6,469 | 34.4% | 2 | 20.0% | 350 | 50.7% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 19 | 12.9% | 9,021 | 48.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 147 | 100.0% | 18,807 | 100.0% | 10 | 100.0% | 690 | 100.0% | 0 | 0.0% | 0 | 0.0% |

*Information based on 2010 ACS data

Peer Group HMDA Loan Distribution Table

Sandusky MSA 2013

| Income Categories | HMDA | | | | | | | |
|---------------------------|-------------------------|---------------|----------------|---------------|--------------------|---------------|----------------|---------------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | Home Purchase | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 58 | 6.21% | 3,865 | 1.77% |
| Moderate | 133 | 14.24% | 12,400 | 5.67% | 187 | 20.02% | 17,268 | 7.89% |
| <i>Low/Moderate Total</i> | <i>133</i> | <i>14.24%</i> | <i>12,400</i> | <i>5.67%</i> | <i>245</i> | <i>26.23%</i> | <i>21,133</i> | <i>9.66%</i> |
| Middle | 484 | 51.82% | 156,389 | 71.45% | 228 | 24.41% | 28,541 | 13.04% |
| Upper | 317 | 33.94% | 50,079 | 22.88% | 350 | 37.47% | 62,072 | 28.36% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 111 | 11.88% | 107,122 | 48.94% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 934 | 100.0% | 218,868 | 100.0% | 934 | 100.0% | 218,868 | 100.0% |
| | Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 95 | 6.13% | 6,903 | 2.19% |
| Moderate | 255 | 16.44% | 120,693 | 38.32% | 230 | 14.83% | 19,553 | 6.21% |
| <i>Low/Moderate Total</i> | <i>255</i> | <i>16.44%</i> | <i>120,693</i> | <i>38.32%</i> | <i>325</i> | <i>20.95%</i> | <i>26,456</i> | <i>8.4%</i> |
| Middle | 791 | 51.0% | 114,045 | 36.21% | 322 | 20.76% | 34,285 | 10.89% |
| Upper | 505 | 32.56% | 80,210 | 25.47% | 755 | 48.68% | 119,202 | 37.85% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 149 | 9.61% | 135,005 | 42.87% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 1,551 | 100.0% | 314,948 | 100.0% | 1,551 | 100.0% | 314,948 | 100.0% |
| | Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 11 | 7.64% | 167 | 2.71% |
| Moderate | 34 | 23.61% | 895 | 14.51% | 28 | 19.44% | 857 | 13.89% |
| <i>Low/Moderate Total</i> | <i>34</i> | <i>23.61%</i> | <i>895</i> | <i>14.51%</i> | <i>39</i> | <i>27.08%</i> | <i>1,024</i> | <i>16.6%</i> |
| Middle | 74 | 51.39% | 3,142 | 50.92% | 53 | 22.92% | 1,050 | 16.69% |
| Upper | 36 | 25.0% | 2,133 | 34.57% | 67 | 46.53% | 3,872 | 62.76% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 5 | 3.47% | 244 | 3.95% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 144 | 100.0% | 6,170 | 100.0% | 144 | 100.0% | 6,170 | 100.0% |
| | Multi-Family | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 4 | 57.14% | 922 | 18.29% | 0 | 0.0% | 0 | 0.0% |
| <i>Low/Moderate Total</i> | <i>4</i> | <i>57.14%</i> | <i>922</i> | <i>18.29%</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> |
| Middle | 2 | 28.57% | 3,773 | 74.86% | 0 | 0.0% | 0 | 0.0% |
| Upper | 1 | 14.29% | 345 | 6.85% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 7 | 100.0% | 5,040 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 7 | 100.0% | 5,040 | 100.0% | 7 | 100.0% | 5,040 | 100.0% |
| | HMDA Totals | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 164 | 6.22% | 10,935 | 2.01% |
| Moderate | 426 | 16.16% | 134,910 | 24.75% | 445 | 16.88% | 37,678 | 6.91% |
| <i>Low/Moderate Total</i> | <i>426</i> | <i>16.16%</i> | <i>134,910</i> | <i>24.75%</i> | <i>609</i> | <i>23.1%</i> | <i>48,613</i> | <i>8.92%</i> |
| Middle | 1,351 | 51.25% | 277,349 | 50.89% | 583 | 22.12% | 63,856 | 11.72% |
| Upper | 859 | 32.59% | 132,767 | 24.36% | 1,172 | 44.46% | 185,146 | 33.97% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 272 | 10.32% | 247,411 | 45.39% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 2,636 | 100.0% | 545,026 | 100.0% | 2,636 | 100.0% | 545,026 | 100.0% |

HMDA Loan Distribution Table

Assessment Area/Group :Non Metro North Central Ohio - 2012, 2013

| Income Categories | HMDA | | | | | | | |
|-------------------------|-----------------|--------|----------|--------|--------------------|--------|----------|--------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2 | 9.5% | 149 | 5.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 4 | 19.0% | 309 | 11.2% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 6 | 28.6% | 458 | 16.6% |
| Middle | 19 | 90.5% | 2,574 | 93.2% | 1 | 4.8% | 77 | 2.8% |
| Upper | 2 | 9.5% | 187 | 6.8% | 11 | 52.4% | 1,723 | 62.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 3 | 14.3% | 503 | 18.2% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 21 | 100.0% | 2,761 | 100.0% | 21 | 100.0% | 2,761 | 100.0% |
| Refinance | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 1 | 1.7% | 89 | 1.0% | 7 | 11.9% | 712 | 7.7% |
| Low/Moderate Total | 1 | 1.7% | 89 | 1.0% | 7 | 11.9% | 712 | 7.7% |
| Middle | 44 | 74.6% | 6,656 | 72.1% | 17 | 28.8% | 1,629 | 17.6% |
| Upper | 14 | 23.7% | 2,491 | 27.0% | 32 | 54.2% | 4,800 | 52.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 3 | 5.1% | 2,095 | 22.7% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 59 | 100.0% | 9,236 | 100.0% | 59 | 100.0% | 9,236 | 100.0% |
| Home Improvement | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3 | 17.6% | 96 | 17.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 4 | 23.5% | 150 | 27.2% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 7 | 41.2% | 246 | 44.6% |
| Middle | 12 | 70.6% | 298 | 54.1% | 4 | 23.5% | 146 | 26.5% |
| Upper | 5 | 29.4% | 253 | 45.9% | 5 | 29.4% | 106 | 19.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1 | 5.9% | 53 | 9.6% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 17 | 100.0% | 551 | 100.0% | 17 | 100.0% | 551 | 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 | 2 | 100.0% | 218 | 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% | 2 | 100.0% | 218 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 2 | 100.0% | 218 | 100.0% | 2 | 100.0% | 218 | 100.0% |
| HMDA Totals | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5 | 5.1% | 245 | 1.9% |
| Moderate | 1 | 1.0% | 89 | 0.7% | 15 | 15.2% | 1,171 | 9.2% |
| Low/Moderate Total | 1 | 1.0% | 89 | 0.7% | 20 | 20.2% | 1,416 | 11.1% |
| Middle | 77 | 77.8% | 9,746 | 76.3% | 22 | 22.2% | 1,852 | 14.5% |
| Upper | 21 | 21.2% | 2,931 | 23.0% | 48 | 48.5% | 6,629 | 51.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 9 | 9.1% | 2,869 | 22.5% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 99 | 100.0% | 12,766 | 100.0% | 99 | 100.0% | 12,766 | 100.0% |

*Information based on 2010 ACS data

CRA Loan Distribution Table

Assessment Area/Group: Non Metro North Central Ohio - 2012, 2013

| Income Categories | SMALL BUSINESS | | | | SMALL FARM | | | | SMALL BUS. SECURED BY REAL ESTATE | | | |
|---|----------------|--------|----------|--------|------------|--------|----------|--------|-----------------------------------|------|----------|------|
| | # | % | \$(000s) | % | # | % | \$(000s) | % | # | % | \$(000s) | % |
| By Tract Income | | | | | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 2 | 1.7% | 55 | 0.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 2 | 1.7% | 55 | 0.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Middle | 83 | 68.6% | 11,874 | 19.5% | 54 | 68.4% | 5,190 | 56.5% | 0 | 0.0% | 0 | 0.0% |
| Upper | 36 | 29.8% | 49,107 | 80.5% | 25 | 31.6% | 3,998 | 43.5% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 121 | 100.0% | 61,036 | 100.0% | 79 | 100.0% | 9,188 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Revenue | | | | | | | | | | | | |
| Total \$1 Million or Less | 73 | 60.3% | 48,972 | 80.2% | 60 | 75.9% | 5,311 | 57.8% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million | 48 | 39.7% | 12,064 | 19.8% | 19 | 24.1% | 3,877 | 42.2% | 0 | 0.0% | 0 | 0.0% |
| Not Known | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 121 | 100.0% | 61,036 | 100.0% | 79 | 100.0% | 9,188 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size | | | | | | | | | | | | |
| \$100,000 or less | 77 | 63.6% | 3,424 | 5.6% | 52 | 65.8% | 2,038 | 22.2% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 25 | 20.7% | 4,016 | 6.6% | 15 | 19.0% | 2,662 | 29.0% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 18 | 14.9% | 10,596 | 17.4% | 12 | 15.2% | 4,488 | 48.8% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 1 | 0.8% | 43,000 | 70.5% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 121 | 100.0% | 61,036 | 100.0% | 79 | 100.0% | 9,188 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size and Revenue \$1 Million or Less | | | | | | | | | | | | |
| \$100,000 or less | 54 | 74.0% | 2,291 | 4.7% | 45 | 75.0% | 1,476 | 27.8% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 15 | 20.5% | 2,485 | 5.1% | 9 | 15.0% | 1,549 | 29.2% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 3 | 4.1% | 1,196 | 2.4% | 6 | 10.0% | 2,286 | 43.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 1 | 1.4% | 43,000 | 87.8% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 73 | 100.0% | 48,972 | 100.0% | 60 | 100.0% | 5,311 | 100.0% | 0 | 0.0% | 0 | 0.0% |

*Information based on 2010 ACS data

Peer Group HMDA Loan Distribution Table

Non Metro North Central Ohio 2013

| Income Categories | HMDA | | | | | | | |
|---------------------------|-------------------------|---------------|----------------|---------------|--------------------|---------------|----------------|---------------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | Home Purchase | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 87 | 8.9% | 5,401 | 5.58% |
| Moderate | 63 | 6.45% | 4,248 | 4.39% | 285 | 29.17% | 23,176 | 23.93% |
| <i>Low/Moderate Total</i> | <i>63</i> | <i>6.45%</i> | <i>4,248</i> | <i>4.39%</i> | <i>372</i> | <i>38.08%</i> | <i>28,577</i> | <i>29.51%</i> |
| Middle | 771 | 78.92% | 76,851 | 79.36% | 236 | 24.16% | 24,568 | 25.37% |
| Upper | 143 | 14.64% | 15,745 | 16.26% | 246 | 25.18% | 32,763 | 33.83% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 123 | 12.59% | 10,936 | 11.29% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 977 | 100.0% | 96,844 | 100.0% | 977 | 100.0% | 96,844 | 100.0% |
| | Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 84 | 5.75% | 5,147 | 2.47% |
| Moderate | 82 | 5.62% | 69,383 | 33.32% | 272 | 18.63% | 20,129 | 9.67% |
| <i>Low/Moderate Total</i> | <i>82</i> | <i>5.62%</i> | <i>69,383</i> | <i>33.32%</i> | <i>356</i> | <i>24.38%</i> | <i>25,276</i> | <i>12.14%</i> |
| Middle | 1,136 | 77.81% | 110,285 | 52.96% | 354 | 24.25% | 31,714 | 15.23% |
| Upper | 242 | 16.58% | 28,586 | 13.73% | 553 | 37.88% | 66,115 | 31.75% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 197 | 13.49% | 85,149 | 40.89% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 1,460 | 100.0% | 208,254 | 100.0% | 1,460 | 100.0% | 208,254 | 100.0% |
| | Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 16 | 11.43% | 281 | 4.24% |
| Moderate | 13 | 9.29% | 301 | 4.54% | 29 | 20.71% | 551 | 8.32% |
| <i>Low/Moderate Total</i> | <i>13</i> | <i>9.29%</i> | <i>301</i> | <i>4.54%</i> | <i>45</i> | <i>32.14%</i> | <i>832</i> | <i>12.56%</i> |
| Middle | 100 | 71.43% | 4,527 | 65.32% | 35 | 25.0% | 1,814 | 27.39% |
| Upper | 27 | 19.29% | 1,996 | 30.13% | 58 | 41.43% | 3,856 | 58.21% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2 | 1.43% | 122 | 1.84% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 140 | 100.0% | 6,624 | 100.0% | 140 | 100.0% | 6,624 | 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% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> |
| Middle | 4 | 80.0% | 3,927 | 79.7% | 0 | 0.0% | 0 | 0.0% |
| Upper | 1 | 20.0% | 1,000 | 20.3% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 5 | 100.0% | 4,927 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 5 | 100.0% | 4,927 | 100.0% | 5 | 100.0% | 4,927 | 100.0% |
| | HMDA Totals | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 187 | 7.24% | 10,829 | 3.42% |
| Moderate | 158 | 6.12% | 73,932 | 23.35% | 586 | 22.7% | 43,856 | 13.85% |
| <i>Low/Moderate Total</i> | <i>158</i> | <i>6.12%</i> | <i>73,932</i> | <i>23.35%</i> | <i>773</i> | <i>29.94%</i> | <i>54,685</i> | <i>17.27%</i> |
| Middle | 2,011 | 77.89% | 195,390 | 61.71% | 625 | 24.21% | 58,096 | 18.35% |
| Upper | 413 | 16.0% | 47,327 | 14.95% | 857 | 33.19% | 102,734 | 32.44% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 327 | 12.66% | 101,134 | 31.94% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 2,582 | 100.0% | 316,649 | 100.0% | 2,582 | 100.0% | 316,649 | 100.0% |

HMDA Loan Distribution Table

Assessment Area/Group :Non Metro North Central Ohio 2014

| Income Categories | HMDA | | | | | | | |
|-------------------------|-----------------|--------|----------|--------|--------------------|--------|----------|--------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 6 | 15.0% | 286 | 5.5% |
| Moderate | 2 | 5.0% | 266 | 5.1% | 8 | 20.0% | 749 | 14.4% |
| Low/Moderate Total | 2 | 5.0% | 266 | 5.1% | 14 | 35.0% | 1,035 | 19.9% |
| Middle | 22 | 55.0% | 1,710 | 33.0% | 5 | 12.5% | 374 | 7.2% |
| Upper | 16 | 40.0% | 3,213 | 61.9% | 19 | 47.5% | 3,692 | 71.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2 | 5.0% | 88 | 1.7% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 40 | 100.0% | 5,189 | 100.0% | 40 | 100.0% | 5,189 | 100.0% |
| Refinance | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 2 | 7.4% | 221 | 4.3% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 2 | 7.4% | 221 | 4.3% |
| Middle | 14 | 51.9% | 3,329 | 65.3% | 12 | 44.4% | 1,166 | 22.9% |
| Upper | 13 | 48.1% | 1,772 | 34.7% | 12 | 44.4% | 3,514 | 68.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1 | 3.7% | 200 | 3.9% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 27 | 100.0% | 5,101 | 100.0% | 27 | 100.0% | 5,101 | 100.0% |
| Home Improvement | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2 | 11.1% | 8 | 0.9% |
| Moderate | 4 | 22.2% | 429 | 49.4% | 3 | 16.7% | 13 | 1.5% |
| Low/Moderate Total | 4 | 22.2% | 429 | 49.4% | 5 | 27.8% | 21 | 2.4% |
| Middle | 8 | 44.4% | 119 | 13.7% | 8 | 44.4% | 83 | 9.6% |
| Upper | 6 | 33.3% | 320 | 36.9% | 4 | 22.2% | 748 | 86.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1 | 5.6% | 16 | 1.8% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 18 | 100.0% | 868 | 100.0% | 18 | 100.0% | 868 | 100.0% |
| Multi-Family | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 1 | 50.0% | 137 | 42.3% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 1 | 50.0% | 137 | 42.3% | 0 | 0.0% | 0 | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Upper | 1 | 50.0% | 187 | 57.7% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2 | 100.0% | 324 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 2 | 100.0% | 324 | 100.0% | 2 | 100.0% | 324 | 100.0% |
| HMDA Totals | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 8 | 9.2% | 294 | 2.6% |
| Moderate | 7 | 8.0% | 832 | 7.2% | 13 | 14.9% | 983 | 8.6% |
| Low/Moderate Total | 7 | 8.0% | 832 | 7.2% | 21 | 24.1% | 1,277 | 11.1% |
| Middle | 44 | 50.6% | 5,158 | 44.9% | 25 | 28.7% | 1,623 | 14.1% |
| Upper | 36 | 41.4% | 5,492 | 47.8% | 35 | 40.2% | 7,954 | 69.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 6 | 6.9% | 628 | 5.5% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 87 | 100.0% | 11,482 | 100.0% | 87 | 100.0% | 11,482 | 100.0% |

*Information based on 2010 ACS data

CRA Loan Distribution Table

Assessment Area/Group: Non Metro North Central Ohio 2014

| Income Categories | SMALL BUSINESS | | | | SMALL FARM | | | | SMALL BUS. SECURED BY REAL ESTATE | | | |
|---|----------------|--------|----------|--------|------------|--------|----------|--------|-----------------------------------|------|----------|------|
| | # | % | \$(000s) | % | # | % | \$(000s) | % | # | % | \$(000s) | % |
| By Tract Income | | | | | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 8 | 7.0% | 371 | 2.2% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 8 | 7.0% | 371 | 2.2% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Middle | 52 | 45.2% | 7,221 | 42.7% | 15 | 65.2% | 1,566 | 59.3% | 0 | 0.0% | 0 | 0.0% |
| Upper | 55 | 47.8% | 9,311 | 55.1% | 8 | 34.8% | 1,077 | 40.7% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 115 | 100.0% | 16,903 | 100.0% | 23 | 100.0% | 2,643 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Revenue | | | | | | | | | | | | |
| Total \$1 Million or Less | 81 | 70.4% | 9,494 | 56.2% | 17 | 73.9% | 1,804 | 68.3% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million | 34 | 29.6% | 7,409 | 43.8% | 6 | 26.1% | 839 | 31.7% | 0 | 0.0% | 0 | 0.0% |
| Not Known | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 115 | 100.0% | 16,903 | 100.0% | 23 | 100.0% | 2,643 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size | | | | | | | | | | | | |
| \$100,000 or less | 76 | 66.1% | 2,734 | 16.2% | 14 | 60.9% | 665 | 25.2% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 19 | 16.5% | 3,469 | 20.5% | 7 | 30.4% | 1,238 | 46.8% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 20 | 17.4% | 10,700 | 63.3% | 2 | 8.7% | 740 | 28.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 115 | 100.0% | 16,903 | 100.0% | 23 | 100.0% | 2,643 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size and Revenue \$1 Million or Less | | | | | | | | | | | | |
| \$100,000 or less | 58 | 71.6% | 1,978 | 20.8% | 12 | 70.6% | 564 | 31.3% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 13 | 16.0% | 2,466 | 26.0% | 3 | 17.6% | 500 | 27.7% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 10 | 12.3% | 5,050 | 53.2% | 2 | 11.8% | 740 | 41.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 81 | 100.0% | 9,494 | 100.0% | 17 | 100.0% | 1,804 | 100.0% | 0 | 0.0% | 0 | 0.0% |

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Assessment Area/Group :Akron Ohio MSA - 2012, 2013, 2014

| Income Categories | HMDA | | | | | | | |
|-------------------------|-----------------|--------|----------|--------|--------------------|--------|----------|--------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 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 | 1 | 100.0% | 1,421 | 100.0% | 1 | 100.0% | 1,421 | 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% | 1,421 | 100.0% | 1 | 100.0% | 1,421 | 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 | 28.6% | 144 | 9.1% | 1 | 14.3% | 280 | 17.6% |
| Upper | 5 | 71.4% | 1,444 | 90.9% | 6 | 85.7% | 1,308 | 82.4% |
| 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% | 1,588 | 100.0% | 7 | 100.0% | 1,588 | 100.0% |
| Home Improvement | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 1 | 100.0% | 100 | 100.0% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 1 | 100.0% | 100 | 100.0% |
| Middle | 1 | 100.0% | 100 | 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% | 100 | 100.0% | 1 | 100.0% | 100 | 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% | 1 | 11.1% | 100 | 3.2% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 1 | 11.1% | 100 | 3.2% |
| Middle | 3 | 33.3% | 244 | 7.8% | 1 | 11.1% | 280 | 9.0% |
| Upper | 6 | 66.7% | 2,865 | 92.2% | 7 | 77.8% | 2,729 | 87.8% |
| 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 | 9 | 100.0% | 3,109 | 100.0% | 9 | 100.0% | 3,109 | 100.0% |

*Information based on 2010 ACS data

CRA Loan Distribution Table

Assessment Area/Group: Akron Ohio MSA - 2012, 2013, 2014

| Income Categories | SMALL BUSINESS | | | | SMALL FARM | | | | SMALL BUS. SECURED BY REAL ESTATE | | | |
|---|----------------|--------|----------|--------|------------|------|----------|------|-----------------------------------|------|----------|------|
| | # | % | \$(000s) | % | # | % | \$(000s) | % | # | % | \$(000s) | % |
| By Tract Income | | | | | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Upper | 15 | 100.0% | 4,278 | 100.0% | 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% | 0 | 0.0% | 0 | 0.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 15 | 100.0% | 4,278 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| By Revenue | | | | | | | | | | | | |
| Total \$1 Million or Less | 10 | 66.7% | 3,328 | 77.8% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million | 5 | 33.3% | 950 | 22.2% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Not Known | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 15 | 100.0% | 4,278 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size | | | | | | | | | | | | |
| \$100,000 or less | 3 | 20.0% | 101 | 2.4% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 5 | 33.3% | 977 | 22.8% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 7 | 46.7% | 3,200 | 74.8% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 15 | 100.0% | 4,278 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size and Revenue \$1 Million or Less | | | | | | | | | | | | |
| \$100,000 or less | 2 | 20.0% | 26 | 0.8% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 2 | 20.0% | 427 | 12.8% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 6 | 60.0% | 2,875 | 86.4% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 10 | 100.0% | 3,328 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |

*Information based on 2010 ACS data

Peer Group HMDA Loan Distribution Table

Selected Year: 2013

Akron Ohio MSA 2013

| Income Categories | HMDA | | | | | | | |
|---------------------------|-------------------------|---------------|----------------|---------------|--------------------|---------------|----------------|---------------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | Home Purchase | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 42 | 3.74% | 3,271 | 1.51% |
| Moderate | 41 | 3.65% | 2,730 | 1.26% | 185 | 16.46% | 19,654 | 9.08% |
| <i>Low/Moderate Total</i> | <i>41</i> | <i>3.65%</i> | <i>2,730</i> | <i>1.26%</i> | <i>227</i> | <i>20.2%</i> | <i>22,925</i> | <i>10.6%</i> |
| Middle | 306 | 27.22% | 34,571 | 15.98% | 205 | 18.24% | 29,239 | 13.51% |
| Upper | 777 | 69.13% | 179,047 | 82.76% | 571 | 50.8% | 146,477 | 67.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 121 | 10.77% | 17,707 | 8.18% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 1,124 | 100.0% | 216,348 | 100.0% | 1,124 | 100.0% | 216,348 | 100.0% |
| | Re finance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 57 | 3.92% | 4,953 | 1.89% |
| Moderate | 51 | 3.51% | 3,899 | 1.49% | 163 | 11.2% | 17,612 | 6.71% |
| <i>Low/Moderate Total</i> | <i>51</i> | <i>3.51%</i> | <i>3,899</i> | <i>1.49%</i> | <i>220</i> | <i>15.12%</i> | <i>22,565</i> | <i>8.6%</i> |
| Middle | 318 | 21.86% | 35,416 | 13.5% | 259 | 17.8% | 34,157 | 13.02% |
| Upper | 1,086 | 74.64% | 223,070 | 85.02% | 824 | 56.63% | 179,421 | 68.38% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 152 | 10.45% | 26,242 | 10.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 1,455 | 100.0% | 262,385 | 100.0% | 1,455 | 100.0% | 262,385 | 100.0% |
| | Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3 | 5.77% | 68 | 1.28% |
| Moderate | 3 | 5.77% | 75 | 1.41% | 7 | 13.46% | 641 | 12.04% |
| <i>Low/Moderate Total</i> | <i>3</i> | <i>5.77%</i> | <i>75</i> | <i>1.41%</i> | <i>10</i> | <i>19.23%</i> | <i>709</i> | <i>13.32%</i> |
| Middle | 8 | 15.38% | 383 | 7.2% | 10 | 19.23% | 727 | 13.66% |
| Upper | 41 | 78.85% | 4,864 | 91.39% | 30 | 57.69% | 3,755 | 70.56% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2 | 3.85% | 131 | 2.46% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 52 | 100.0% | 5,322 | 100.0% | 52 | 100.0% | 5,322 | 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% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> |
| Middle | 3 | 75.0% | 2,486 | 80.77% | 0 | 0.0% | 0 | 0.0% |
| Upper | 1 | 25.0% | 592 | 19.23% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 4 | 100.0% | 3,078 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 4 | 100.0% | 3,078 | 100.0% | 4 | 100.0% | 3,078 | 100.0% |
| | HMDA Totals | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 102 | 3.87% | 8,292 | 1.7% |
| Moderate | 95 | 3.61% | 6,704 | 1.38% | 355 | 13.47% | 37,907 | 7.78% |
| <i>Low/Moderate Total</i> | <i>95</i> | <i>3.61%</i> | <i>6,704</i> | <i>1.38%</i> | <i>457</i> | <i>17.34%</i> | <i>46,199</i> | <i>9.48%</i> |
| Middle | 635 | 24.1% | 72,856 | 14.96% | 474 | 17.99% | 64,123 | 13.16% |
| Upper | 1,905 | 72.3% | 407,573 | 83.67% | 1,425 | 54.08% | 329,653 | 67.67% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 279 | 10.59% | 47,158 | 9.68% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 2,635 | 100.0% | 487,133 | 100.0% | 2,635 | 100.0% | 487,133 | 100.0% |

HMDA Loan Distribution Table

Assessment Area/Group : Columbus MSA 2012, 2013 2014

| Income Categories | HMDA | | | | | | | |
|-------------------------|-----------------|--------|----------|--------|--------------------|--------|----------|--------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1 | 4.3% | 84 | 1.8% |
| Moderate | 1 | 4.3% | 133 | 2.8% | 2 | 8.7% | 247 | 5.2% |
| Low/Moderate Total | 1 | 4.3% | 133 | 2.8% | 3 | 13.0% | 331 | 7.0% |
| Middle | 10 | 43.5% | 2,078 | 43.8% | 8 | 34.8% | 915 | 19.3% |
| Upper | 12 | 52.2% | 2,532 | 53.4% | 12 | 52.2% | 3,497 | 73.7% |
| 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 | 23 | 100.0% | 4,743 | 100.0% | 23 | 100.0% | 4,743 | 100.0% |
| Refinance | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1 | 7.1% | 50 | 1.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 3 | 21.4% | 261 | 8.6% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 4 | 28.6% | 311 | 10.3% |
| Middle | 4 | 28.6% | 545 | 18.0% | 1 | 7.1% | 50 | 1.6% |
| Upper | 10 | 71.4% | 2,486 | 82.0% | 9 | 64.3% | 2,670 | 88.1% |
| 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 | 14 | 100.0% | 3,031 | 100.0% | 14 | 100.0% | 3,031 | 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 | 1 | 100.0% | 85 | 100.0% | 1 | 100.0% | 85 | 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% | 85 | 100.0% | 1 | 100.0% | 85 | 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 | 1 | 100.0% | 10,785 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1 | 100.0% | 10,785 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 1 | 100.0% | 10,785 | 100.0% | 1 | 100.0% | 10,785 | 100.0% |
| HMDA Totals | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2 | 5.1% | 134 | 0.7% |
| Moderate | 1 | 2.6% | 133 | 0.7% | 5 | 12.8% | 508 | 2.7% |
| Low/Moderate Total | 1 | 2.6% | 133 | 0.7% | 7 | 17.9% | 642 | 3.4% |
| Middle | 14 | 35.9% | 2,623 | 14.1% | 9 | 23.1% | 965 | 5.2% |
| Upper | 24 | 61.5% | 15,888 | 85.2% | 22 | 56.4% | 6,252 | 33.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1 | 2.6% | 10,785 | 57.8% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 39 | 100.0% | 18,644 | 100.0% | 39 | 100.0% | 18,644 | 100.0% |

*Information based on 2010 ACS data

CRA Loan Distribution Table

Assessment Area/Group: Columbus MSA- 2012, 2013, 2014

| Income Categories | SMALL BUSINESS | | | | SMALL FARM | | | | SMALL BUS. SECURED BY REAL ESTATE | | | |
|---|----------------|--------|----------|--------|------------|--------|----------|--------|-----------------------------------|------|----------|------|
| | # | % | \$(000s) | % | # | % | \$(000s) | % | # | % | \$(000s) | % |
| By Tract Income | | | | | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Middle | 15 | 37.5% | 2,477 | 32.4% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Upper | 25 | 62.5% | 5,161 | 67.6% | 1 | 100.0% | 175 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 40 | 100.0% | 7,638 | 100.0% | 1 | 100.0% | 175 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Revenue | | | | | | | | | | | | |
| Total \$1 Million or Less | 14 | 35.0% | 2,164 | 28.3% | 1 | 100.0% | 175 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million | 26 | 65.0% | 5,474 | 71.7% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Not Known | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 40 | 100.0% | 7,638 | 100.0% | 1 | 100.0% | 175 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size | | | | | | | | | | | | |
| \$100,000 or less | 15 | 37.5% | 615 | 8.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 16 | 40.0% | 2,482 | 32.5% | 1 | 100.0% | 175 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 9 | 22.5% | 4,541 | 59.5% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 40 | 100.0% | 7,638 | 100.0% | 1 | 100.0% | 175 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size and Revenue \$1 Million or Less | | | | | | | | | | | | |
| \$100,000 or less | 8 | 57.1% | 317 | 14.6% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 3 | 21.4% | 347 | 16.0% | 1 | 100.0% | 175 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 3 | 21.4% | 1,500 | 69.3% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 14 | 100.0% | 2,164 | 100.0% | 1 | 100.0% | 175 | 100.0% | 0 | 0.0% | 0 | 0.0% |

*Information based on 2010 ACS data

Peer Group HMDA Loan Distribution Table

Selected Year: 2013

Columbus MSA 2013

| Income Categories | HMDA | | | | | | | |
|---------------------------|-----------------|---------------|------------------|---------------|--------------------|---------------|------------------|---------------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 112 | 3.27% | 10,571 | 1.32% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 517 | 15.1% | 69,518 | 8.67% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>629</i> | <i>18.38%</i> | <i>80,089</i> | <i>9.99%</i> |
| Middle | 1,037 | 30.3% | 206,965 | 25.83% | 656 | 19.16% | 108,053 | 13.48% |
| Upper | 2,386 | 69.7% | 594,429 | 74.17% | 1,661 | 48.52% | 432,578 | 53.98% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 477 | 13.94% | 180,674 | 22.54% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 3,423 | 100.0% | 801,394 | 100.0% | 3,423 | 100.0% | 801,394 | 100.0% |
| Refinance | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 125 | 2.48% | 12,261 | 1.13% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 464 | 9.22% | 52,413 | 4.83% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>589</i> | <i>11.71%</i> | <i>64,674</i> | <i>5.96%</i> |
| Middle | 1,433 | 28.48% | 226,350 | 20.87% | 885 | 17.59% | 123,588 | 11.39% |
| Upper | 3,599 | 71.52% | 858,244 | 79.13% | 2,965 | 58.92% | 628,382 | 57.94% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 593 | 11.78% | 267,950 | 24.71% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 5,032 | 100.0% | 1,084,594 | 100.0% | 5,032 | 100.0% | 1,084,594 | 100.0% |
| Home Improvement | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3 | 1.58% | 150 | 0.65% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 20 | 10.53% | 1,501 | 6.53% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>23</i> | <i>12.11%</i> | <i>1,651</i> | <i>7.18%</i> |
| Middle | 55 | 28.95% | 4,214 | 18.33% | 42 | 22.11% | 3,617 | 15.73% |
| Upper | 135 | 71.05% | 18,778 | 81.67% | 121 | 63.68% | 16,860 | 73.33% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 4 | 2.11% | 864 | 3.76% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 190 | 100.0% | 22,992 | 100.0% | 190 | 100.0% | 22,992 | 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% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> |
| Middle | 9 | 47.37% | 65,328 | 37.19% | 0 | 0.0% | 0 | 0.0% |
| Upper | 10 | 52.63% | 110,346 | 62.81% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 19 | 100.0% | 175,674 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 19 | 100.0% | 175,674 | 100.0% | 19 | 100.0% | 175,674 | 100.0% |
| HMDA Totals | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 240 | 2.77% | 22,982 | 1.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 1,001 | 11.55% | 123,432 | 5.92% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>1,241</i> | <i>14.32%</i> | <i>146,414</i> | <i>7.02%</i> |
| Middle | 2,534 | 29.25% | 502,857 | 24.12% | 1,583 | 18.27% | 235,258 | 11.29% |
| Upper | 6,130 | 70.75% | 1,581,797 | 75.88% | 4,747 | 54.79% | 1,077,820 | 51.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1,093 | 12.62% | 625,162 | 29.99% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 8,664 | 100.0% | 2,084,654 | 100.0% | 8,664 | 100.0% | 2,084,654 | 100.0% |

HMDA Loan Distribution Table

Assessment Area/Group :Mansfield MSA - 2012, 2013, 2014

| Income Categories | HMDA | | | | | | | |
|-------------------------|-----------------|--------|----------|--------|--------------------|--------|----------|--------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1 | 10.0% | 50 | 4.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 2 | 20.0% | 198 | 15.8% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 3 | 30.0% | 248 | 19.7% |
| Middle | 5 | 50.0% | 460 | 36.6% | 3 | 30.0% | 305 | 24.3% |
| Upper | 5 | 50.0% | 797 | 63.4% | 4 | 40.0% | 704 | 56.0% |
| 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 | 10 | 100.0% | 1,257 | 100.0% | 10 | 100.0% | 1,257 | 100.0% |
| Refinance | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5 | 14.7% | 791 | 18.6% |
| Moderate | 1 | 2.9% | 57 | 1.3% | 6 | 17.6% | 722 | 17.0% |
| Low/Moderate Total | 1 | 2.9% | 57 | 1.3% | 11 | 32.4% | 1,513 | 35.6% |
| Middle | 23 | 67.6% | 3,017 | 71.1% | 7 | 20.6% | 369 | 8.7% |
| Upper | 10 | 29.4% | 1,171 | 27.6% | 16 | 47.1% | 2,363 | 55.7% |
| 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 | 34 | 100.0% | 4,245 | 100.0% | 34 | 100.0% | 4,245 | 100.0% |
| Home Improvement | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 2 | 16.7% | 3 | 0.9% | 3 | 25.0% | 50 | 15.0% |
| Low/Moderate Total | 2 | 16.7% | 3 | 0.9% | 3 | 25.0% | 50 | 15.0% |
| Middle | 10 | 83.3% | 331 | 99.1% | 4 | 33.3% | 146 | 43.7% |
| Upper | 0 | 0.0% | 0 | 0.0% | 5 | 41.7% | 138 | 41.3% |
| 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 | 12 | 100.0% | 334 | 100.0% | 12 | 100.0% | 334 | 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% | 167 | 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% | 167 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 1 | 100.0% | 167 | 100.0% | 1 | 100.0% | 167 | 100.0% |
| HMDA Totals | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 6 | 10.5% | 841 | 14.0% |
| Moderate | 3 | 5.3% | 60 | 1.0% | 11 | 19.3% | 970 | 16.2% |
| Low/Moderate Total | 3 | 5.3% | 60 | 1.0% | 17 | 29.8% | 1,811 | 30.2% |
| Middle | 39 | 68.4% | 3,975 | 66.2% | 14 | 24.6% | 820 | 13.7% |
| Upper | 15 | 26.3% | 1,968 | 32.8% | 25 | 43.9% | 3,205 | 53.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1 | 1.8% | 167 | 2.8% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 57 | 100.0% | 6,003 | 100.0% | 57 | 100.0% | 6,003 | 100.0% |

*Information based on 2010 ACS data

CRA Loan Distribution Table

Assessment Area/Group: Mansfield MSA - 2012, 2013, 2014

| Income Categories | SMALL BUSINESS | | | | SMALL FARM | | | | SMALL BUS. SECURED BY REAL ESTATE | | | |
|---|---|---------------|--------------|---------------|------------|---------------|--------------|---------------|-----------------------------------|-------------|----------|-------------|
| | # | % | \$(000s) | % | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | By Tract Income | | | | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 5 | 9.1% | 107 | 2.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 5 | 9.1% | 107 | 2.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Middle | 38 | 69.1% | 4,434 | 86.0% | 29 | 85.3% | 3,168 | 75.8% | 0 | 0.0% | 0 | 0.0% |
| Upper | 12 | 21.8% | 614 | 11.9% | 5 | 14.7% | 1,012 | 24.2% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 55 | 100.0% | 5,155 | 100.0% | 34 | 100.0% | 4,180 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| | By Revenue | | | | | | | | | | | |
| Total \$1 Million or Less | 52 | 94.5% | 4,865 | 94.4% | 27 | 79.4% | 3,127 | 74.8% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million | 3 | 5.5% | 290 | 5.6% | 7 | 20.6% | 1,053 | 25.2% | 0 | 0.0% | 0 | 0.0% |
| Not Known | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 55 | 100.0% | 5,155 | 100.0% | 34 | 100.0% | 4,180 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| | By Loan Size | | | | | | | | | | | |
| \$100,000 or less | 44 | 80.0% | 1,723 | 33.4% | 20 | 58.8% | 1,048 | 25.1% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 8 | 14.5% | 1,546 | 30.0% | 10 | 29.4% | 1,468 | 35.1% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 3 | 5.5% | 1,886 | 36.6% | 4 | 11.8% | 1,664 | 39.8% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 55 | 100.0% | 5,155 | 100.0% | 34 | 100.0% | 4,180 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| | By Loan Size and Revenue \$1 Million or Less | | | | | | | | | | | |
| \$100,000 or less | 42 | 80.8% | 1,623 | 33.4% | 17 | 63.0% | 763 | 24.4% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 7 | 13.5% | 1,356 | 27.9% | 7 | 25.9% | 970 | 31.0% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 3 | 5.8% | 1,886 | 38.8% | 3 | 11.1% | 1,394 | 44.6% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 52 | 100.0% | 4,865 | 100.0% | 27 | 100.0% | 3,127 | 100.0% | 0 | 0.0% | 0 | 0.0% |

*Information based on 2010 ACS data

Peer Group HMDA Loan Distribution Table

Selected Year: 2013

Mansfield MSA 2013

| Income Categories | HMDA | | | | | | | |
|---------------------------|-----------------|---------------|----------------|---------------|--------------------|---------------|----------------|---------------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 113 | 9.42% | 6,494 | 5.32% |
| Moderate | 115 | 9.58% | 7,230 | 5.92% | 289 | 24.08% | 23,144 | 18.95% |
| <i>Low/Moderate Total</i> | <i>115</i> | <i>9.58%</i> | <i>7,230</i> | <i>5.92%</i> | <i>402</i> | <i>33.5%</i> | <i>29,638</i> | <i>24.27%</i> |
| Middle | 624 | 52.0% | 60,934 | 49.89% | 280 | 23.33% | 28,074 | 22.99% |
| Upper | 461 | 38.42% | 53,967 | 44.19% | 377 | 31.42% | 52,800 | 43.23% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 141 | 11.75% | 11,619 | 9.51% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 1,200 | 100.0% | 122,131 | 100.0% | 1,200 | 100.0% | 122,131 | 100.0% |
| Refinance | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 131 | 7.4% | 8,257 | 3.74% |
| Moderate | 201 | 11.36% | 11,757 | 5.32% | 311 | 17.57% | 24,981 | 11.31% |
| <i>Low/Moderate Total</i> | <i>201</i> | <i>11.36%</i> | <i>11,757</i> | <i>5.32%</i> | <i>442</i> | <i>24.97%</i> | <i>33,238</i> | <i>15.04%</i> |
| Middle | 909 | 51.36% | 133,052 | 60.22% | 405 | 22.88% | 35,917 | 16.26% |
| Upper | 660 | 37.29% | 76,132 | 34.46% | 671 | 37.91% | 85,232 | 38.58% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 252 | 14.24% | 66,554 | 30.12% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 1,770 | 100.0% | 220,941 | 100.0% | 1,770 | 100.0% | 220,941 | 100.0% |
| Home Improvement | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 18 | 8.74% | 209 | 2.86% |
| Moderate | 31 | 15.05% | 277 | 3.79% | 46 | 22.33% | 1,163 | 15.92% |
| <i>Low/Moderate Total</i> | <i>31</i> | <i>15.05%</i> | <i>277</i> | <i>3.79%</i> | <i>64</i> | <i>31.07%</i> | <i>1,372</i> | <i>18.78%</i> |
| Middle | 119 | 57.77% | 4,424 | 60.54% | 74 | 35.92% | 2,513 | 34.39% |
| Upper | 56 | 27.18% | 2,606 | 35.66% | 62 | 30.1% | 2,665 | 36.47% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 6 | 2.91% | 757 | 10.36% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 206 | 100.0% | 7,307 | 100.0% | 206 | 100.0% | 7,307 | 100.0% |
| Multi-Family | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 5 | 41.67% | 2,175 | 21.13% | 0 | 0.0% | 0 | 0.0% |
| <i>Low/Moderate Total</i> | <i>5</i> | <i>41.67%</i> | <i>2,175</i> | <i>21.13%</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> |
| Middle | 3 | 25.0% | 1,652 | 16.05% | 0 | 0.0% | 0 | 0.0% |
| Upper | 4 | 33.33% | 6,467 | 62.82% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 12 | 100.0% | 10,294 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 12 | 100.0% | 10,294 | 100.0% | 12 | 100.0% | 10,294 | 100.0% |
| HMDA Totals | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 262 | 8.22% | 14,960 | 4.15% |
| Moderate | 352 | 11.04% | 21,439 | 5.94% | 646 | 20.26% | 49,288 | 13.67% |
| <i>Low/Moderate Total</i> | <i>352</i> | <i>11.04%</i> | <i>21,439</i> | <i>5.94%</i> | <i>908</i> | <i>28.48%</i> | <i>64,248</i> | <i>17.83%</i> |
| Middle | 1,655 | 51.91% | 200,062 | 55.47% | 759 | 23.81% | 66,504 | 18.44% |
| Upper | 1,181 | 37.05% | 139,172 | 38.59% | 1,110 | 34.82% | 140,697 | 39.01% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 411 | 12.89% | 89,224 | 24.74% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 3,188 | 100.0% | 360,673 | 100.0% | 3,188 | 100.0% | 360,673 | 100.0% |

HMDA Loan Distribution Table

Assessment Area/Group : Toledo MSA - 2012, 2013

| Income Categories | HMDA | | | | | | | |
|-------------------------|-----------------|--------|----------|--------|--------------------|--------|----------|--------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Middle | 8 | 88.9% | 2,036 | 90.7% | 2 | 22.2% | 303 | 13.5% |
| Upper | 1 | 11.1% | 208 | 9.3% | 7 | 77.8% | 1,941 | 86.5% |
| 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 | 9 | 100.0% | 2,244 | 100.0% | 9 | 100.0% | 2,244 | 100.0% |
| Refinance | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1 | 6.3% | 180 | 4.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 1 | 6.3% | 153 | 4.0% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 2 | 12.5% | 333 | 8.7% |
| Middle | 8 | 50.0% | 1,744 | 45.4% | 2 | 12.5% | 543 | 14.1% |
| Upper | 8 | 50.0% | 2,097 | 54.6% | 12 | 75.0% | 2,965 | 77.2% |
| 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 | 16 | 100.0% | 3,841 | 100.0% | 16 | 100.0% | 3,841 | 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 | 2 | 100.0% | 333 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 2 | 100.0% | 333 | 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% | 333 | 100.0% | 2 | 100.0% | 333 | 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 | 2 | 100.0% | 300 | 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% | 2 | 100.0% | 300 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 2 | 100.0% | 300 | 100.0% | 2 | 100.0% | 300 | 100.0% |
| HMDA Totals | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1 | 3.4% | 180 | 2.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 1 | 3.4% | 153 | 2.3% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 2 | 6.9% | 333 | 5.0% |
| Middle | 20 | 69.0% | 4,413 | 65.7% | 4 | 13.8% | 846 | 12.6% |
| Upper | 9 | 31.0% | 2,305 | 34.3% | 21 | 72.4% | 5,239 | 78.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2 | 6.9% | 300 | 4.5% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 29 | 100.0% | 6,718 | 100.0% | 29 | 100.0% | 6,718 | 100.0% |

*Information based on 2010 ACS data

CRA Loan Distribution Table

Assessment Area/Group: Toledo MSA - 2012, 2013

| Income Categories | SMALL BUSINESS | | | | SMALL FARM | | | | SMALL BUS. SECURED BY REAL ESTATE | | | |
|---|----------------|--------|----------|--------|------------|------|----------|------|-----------------------------------|------|----------|------|
| | # | % | \$(000s) | % | # | % | \$(000s) | % | # | % | \$(000s) | % |
| By Tract Income | | | | | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Middle | 23 | 59.0% | 4,240 | 51.2% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Upper | 16 | 41.0% | 4,042 | 48.8% | 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% | 0 | 0.0% | 0 | 0.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 39 | 100.0% | 8,282 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| By Revenue | | | | | | | | | | | | |
| Total \$1 Million or Less | 29 | 74.4% | 5,398 | 65.2% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million | 10 | 25.6% | 2,884 | 34.8% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Not Known | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 39 | 100.0% | 8,282 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size | | | | | | | | | | | | |
| \$100,000 or less | 17 | 43.6% | 761 | 9.2% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 7 | 17.9% | 1,276 | 15.4% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 15 | 38.5% | 6,245 | 75.4% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 39 | 100.0% | 8,282 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size and Revenue \$1 Million or Less | | | | | | | | | | | | |
| \$100,000 or less | 16 | 55.2% | 711 | 13.2% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 4 | 13.8% | 742 | 13.7% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 9 | 31.0% | 3,945 | 73.1% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 29 | 100.0% | 5,398 | 100.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |

*Information based on 2010 ACS data

Peer Group HMDA Loan Distribution Table

Selected Year: 2013

Toledo MSA 2013

| Income Categories | HMDA | | | | | | | |
|---------------------------|-----------------|---------------|----------------|---------------|--------------------|---------------|----------------|---------------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 10 | 2.84% | 598 | 1.03% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 39 | 11.08% | 3,751 | 6.47% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>49</i> | <i>13.92%</i> | <i>4,349</i> | <i>7.5%</i> |
| Middle | 247 | 70.17% | 36,137 | 62.32% | 50 | 14.2% | 5,997 | 10.34% |
| Upper | 105 | 29.83% | 21,848 | 37.68% | 226 | 64.2% | 42,373 | 73.08% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 27 | 7.67% | 5,266 | 9.08% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 352 | 100.0% | 57,985 | 100.0% | 352 | 100.0% | 57,985 | 100.0% |
| Refinance | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21 | 3.49% | 2,093 | 2.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 56 | 9.32% | 4,999 | 5.27% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>77</i> | <i>12.81%</i> | <i>7,092</i> | <i>7.47%</i> |
| Middle | 381 | 63.39% | 54,405 | 57.31% | 107 | 17.8% | 11,340 | 11.95% |
| Upper | 220 | 36.61% | 40,525 | 42.69% | 376 | 62.56% | 70,587 | 74.36% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 41 | 6.82% | 5,911 | 6.23% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 601 | 100.0% | 94,930 | 100.0% | 601 | 100.0% | 94,930 | 100.0% |
| Home Improvement | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4 | 14.81% | 125 | 5.77% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 7 | 25.93% | 412 | 19.0% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>11</i> | <i>40.74%</i> | <i>537</i> | <i>24.77%</i> |
| Middle | 17 | 62.96% | 930 | 42.9% | 5 | 18.52% | 387 | 17.85% |
| Upper | 10 | 37.04% | 1,238 | 57.1% | 11 | 40.74% | 1,244 | 57.38% |
| 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 | 27 | 100.0% | 2,168 | 100.0% | 27 | 100.0% | 2,168 | 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% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> |
| Middle | 3 | 100.0% | 854 | 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% | 3 | 100.0% | 854 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 3 | 100.0% | 854 | 100.0% | 3 | 100.0% | 854 | 100.0% |
| HMDA Totals | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 35 | 3.56% | 2,816 | 1.81% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 102 | 10.38% | 9,162 | 5.88% |
| <i>Low/Moderate Total</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> | <i>137</i> | <i>13.94%</i> | <i>11,978</i> | <i>7.68%</i> |
| Middle | 648 | 65.92% | 92,326 | 59.21% | 162 | 16.48% | 17,724 | 11.37% |
| Upper | 335 | 34.08% | 63,611 | 40.79% | 613 | 62.36% | 114,204 | 73.24% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 71 | 7.22% | 12,031 | 7.72% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 983 | 100.0% | 155,937 | 100.0% | 983 | 100.0% | 155,937 | 100.0% |

HMDA Loan Distribution Table

Assessment Area/Group :Non Metro West Central Ohio - 2012, 2013, 2014

| Income Categories | HMDA | | | | | | | |
|-------------------------|-----------------|--------|----------|--------|--------------------|--------|----------|--------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1 | 4.3% | 51 | 1.8% |
| Moderate | 7 | 30.4% | 624 | 21.9% | 7 | 30.4% | 413 | 14.5% |
| Low/Moderate Total | 7 | 30.4% | 624 | 21.9% | 8 | 34.8% | 464 | 16.3% |
| Middle | 8 | 34.8% | 800 | 28.1% | 4 | 17.4% | 643 | 22.6% |
| Upper | 8 | 34.8% | 1,419 | 49.9% | 10 | 43.5% | 1,571 | 55.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1 | 4.3% | 165 | 5.8% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 23 | 100.0% | 2,843 | 100.0% | 23 | 100.0% | 2,843 | 100.0% |
| Refinance | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3 | 7.3% | 354 | 5.0% |
| Moderate | 9 | 22.0% | 2,706 | 38.2% | 8 | 19.5% | 607 | 8.6% |
| Low/Moderate Total | 9 | 22.0% | 2,706 | 38.2% | 11 | 26.8% | 961 | 13.6% |
| Middle | 16 | 39.0% | 1,650 | 23.3% | 8 | 19.5% | 880 | 12.4% |
| Upper | 16 | 39.0% | 2,731 | 38.5% | 21 | 51.2% | 3,228 | 45.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1 | 2.4% | 2,018 | 28.5% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 41 | 100.0% | 7,087 | 100.0% | 41 | 100.0% | 7,087 | 100.0% |
| Home Improvement | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2 | 9.5% | 7 | 2.0% |
| Moderate | 4 | 19.0% | 15 | 4.3% | 7 | 33.3% | 104 | 29.6% |
| Low/Moderate Total | 4 | 19.0% | 15 | 4.3% | 9 | 42.9% | 111 | 31.6% |
| Middle | 7 | 33.3% | 130 | 37.0% | 6 | 28.6% | 63 | 17.9% |
| Upper | 10 | 47.6% | 206 | 58.7% | 6 | 28.6% | 177 | 50.4% |
| 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 | 21 | 100.0% | 351 | 100.0% | 21 | 100.0% | 351 | 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% | 405 | 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% | 405 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 1 | 100.0% | 405 | 100.0% | 1 | 100.0% | 405 | 100.0% |
| HMDA Totals | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 6 | 7.0% | 412 | 3.9% |
| Moderate | 20 | 23.3% | 3,345 | 31.3% | 22 | 25.6% | 1,124 | 10.5% |
| Low/Moderate Total | 20 | 23.3% | 3,345 | 31.3% | 28 | 32.6% | 1,536 | 14.4% |
| Middle | 32 | 37.2% | 2,985 | 27.9% | 18 | 20.9% | 1,586 | 14.8% |
| Upper | 34 | 39.5% | 4,356 | 40.8% | 37 | 43.0% | 4,976 | 46.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 3 | 3.5% | 2,588 | 24.2% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 86 | 100.0% | 10,686 | 100.0% | 86 | 100.0% | 10,686 | 100.0% |

*Information based on 2010 ACS data

CRA Loan Distribution Table

Assessment Area/Group: Non Metro West Central Ohio - 2012, 2013, 2014

| Income Categories | SMALL BUSINESS | | | | SMALL FARM | | | | SMALL BUS. SECURED BY REAL ESTATE | | | |
|---|----------------|--------|----------|--------|------------|--------|----------|--------|-----------------------------------|------|----------|------|
| | # | % | \$(000s) | % | # | % | \$(000s) | % | # | % | \$(000s) | % |
| By Tract Income | | | | | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 12 | 20.3% | 1,106 | 15.2% | 12 | 14.0% | 1,332 | 2.6% | 0 | 0.0% | 0 | 0.0% |
| Low/Moderate Total | 12 | 20.3% | 1,106 | 15.2% | 12 | 14.0% | 1,332 | 2.6% | 0 | 0.0% | 0 | 0.0% |
| Middle | 23 | 39.0% | 1,996 | 27.5% | 20 | 23.3% | 1,154 | 2.3% | 0 | 0.0% | 0 | 0.0% |
| Upper | 24 | 40.7% | 4,166 | 57.3% | 54 | 62.8% | 48,201 | 95.1% | 0 | 0.0% | 0 | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 59 | 100.0% | 7,268 | 100.0% | 86 | 100.0% | 50,687 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Revenue | | | | | | | | | | | | |
| Total \$1 Million or Less | 38 | 64.4% | 3,248 | 44.7% | 69 | 80.2% | 47,883 | 94.5% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million | 21 | 35.6% | 4,020 | 55.3% | 17 | 19.8% | 2,804 | 5.5% | 0 | 0.0% | 0 | 0.0% |
| Not Known | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 59 | 100.0% | 7,268 | 100.0% | 86 | 100.0% | 50,687 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size | | | | | | | | | | | | |
| \$100,000 or less | 45 | 76.3% | 2,036 | 28.0% | 63 | 73.3% | 2,409 | 4.8% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 7 | 11.9% | 1,261 | 17.4% | 14 | 16.3% | 2,247 | 4.4% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 7 | 11.9% | 3,971 | 54.6% | 8 | 9.3% | 3,031 | 6.0% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 1 | 1.2% | 43,000 | 84.8% | 0 | 0.0% | 0 | 0.0% |
| Total | 59 | 100.0% | 7,268 | 100.0% | 86 | 100.0% | 50,687 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| By Loan Size and Revenue \$1 Million or Less | | | | | | | | | | | | |
| \$100,000 or less | 32 | 84.2% | 1,212 | 37.3% | 56 | 81.2% | 2,006 | 4.2% | 0 | 0.0% | 0 | 0.0% |
| \$100,001 - \$250,000 | 3 | 7.9% | 465 | 14.3% | 7 | 10.1% | 1,046 | 2.2% | 0 | 0.0% | 0 | 0.0% |
| \$250,001 - \$1 Million (Bus)-\$500k (Farm) | 3 | 7.9% | 1,571 | 48.4% | 5 | 7.2% | 1,831 | 3.8% | 0 | 0.0% | 0 | 0.0% |
| Over \$1 Million (Bus)-\$500k (Farm) | 0 | 0.0% | 0 | 0.0% | 1 | 1.4% | 43,000 | 89.8% | 0 | 0.0% | 0 | 0.0% |
| Total | 38 | 100.0% | 3,248 | 100.0% | 69 | 100.0% | 47,883 | 100.0% | 0 | 0.0% | 0 | 0.0% |

*Information based on 2010 ACS data

Peer Group HMDA Loan Distribution Table

Selected Year: 2013

Non Metro West Central Ohio 2013

| Income Categories | HMDA | | | | | | | |
|---------------------------|-------------------------|---------------|----------------|---------------|--------------------|---------------|----------------|---------------|
| | By Tract Income | | | | By Borrower Income | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| | Home Purchase | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 59 | 6.39% | 3,897 | 3.75% |
| Moderate | 159 | 17.23% | 14,927 | 14.35% | 226 | 24.49% | 19,991 | 19.21% |
| <i>Low/Moderate Total</i> | <i>159</i> | <i>17.23%</i> | <i>14,927</i> | <i>14.35%</i> | <i>285</i> | <i>30.88%</i> | <i>23,888</i> | <i>22.96%</i> |
| Middle | 510 | 55.25% | 55,872 | 53.7% | 242 | 26.22% | 28,470 | 27.36% |
| Upper | 254 | 27.52% | 33,250 | 31.96% | 301 | 32.61% | 43,212 | 41.53% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 95 | 10.29% | 8,479 | 8.15% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 923 | 100.0% | 104,049 | 100.0% | 923 | 100.0% | 104,049 | 100.0% |
| | Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 50 | 3.87% | 3,479 | 2.13% |
| Moderate | 148 | 11.46% | 12,880 | 7.87% | 170 | 13.16% | 13,902 | 8.5% |
| <i>Low/Moderate Total</i> | <i>148</i> | <i>11.46%</i> | <i>12,880</i> | <i>7.87%</i> | <i>220</i> | <i>17.03%</i> | <i>17,381</i> | <i>10.62%</i> |
| Middle | 681 | 52.71% | 90,991 | 55.61% | 326 | 25.23% | 31,912 | 19.5% |
| Upper | 463 | 35.84% | 59,747 | 36.52% | 562 | 43.5% | 78,502 | 47.98% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 184 | 14.24% | 35,823 | 21.89% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 1,292 | 100.0% | 163,618 | 100.0% | 1,292 | 100.0% | 163,618 | 100.0% |
| | Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 6 | 4.76% | 78 | 1.13% |
| Moderate | 14 | 11.11% | 668 | 9.65% | 27 | 21.43% | 822 | 11.88% |
| <i>Low/Moderate Total</i> | <i>14</i> | <i>11.11%</i> | <i>668</i> | <i>9.65%</i> | <i>33</i> | <i>26.19%</i> | <i>900</i> | <i>13.0%</i> |
| Middle | 57 | 45.24% | 4,159 | 60.08% | 34 | 26.98% | 1,423 | 20.56% |
| Upper | 55 | 43.65% | 2,095 | 30.27% | 57 | 45.24% | 4,310 | 62.27% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2 | 1.59% | 289 | 4.18% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 126 | 100.0% | 6,922 | 100.0% | 126 | 100.0% | 6,922 | 100.0% |
| | Multi-Family | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Moderate | 2 | 50.0% | 2,755 | 75.07% | 0 | 0.0% | 0 | 0.0% |
| <i>Low/Moderate Total</i> | <i>2</i> | <i>50.0%</i> | <i>2,755</i> | <i>75.07%</i> | <i>0</i> | <i>0.0%</i> | <i>0</i> | <i>0.0%</i> |
| Middle | 2 | 50.0% | 915 | 24.93% | 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% | 4 | 100.0% | 3,670 | 100.0% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 4 | 100.0% | 3,670 | 100.0% | 4 | 100.0% | 3,670 | 100.0% |
| | HMDA Totals | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 115 | 4.9% | 7,454 | 2.68% |
| Moderate | 323 | 13.77% | 31,230 | 11.22% | 423 | 18.04% | 34,715 | 12.48% |
| <i>Low/Moderate Total</i> | <i>323</i> | <i>13.77%</i> | <i>31,230</i> | <i>11.22%</i> | <i>538</i> | <i>22.94%</i> | <i>42,169</i> | <i>15.15%</i> |
| Middle | 1,250 | 53.3% | 151,937 | 54.6% | 602 | 25.67% | 61,805 | 22.21% |
| Upper | 772 | 32.92% | 95,092 | 34.17% | 920 | 39.23% | 126,024 | 45.29% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 285 | 12.15% | 48,261 | 17.34% |
| Tract Unknown | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 2,345 | 100.0% | 278,259 | 100.0% | 2,345 | 100.0% | 278,259 | 100.0% |

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.

Residential loans: See home mortgage loans.

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.