

PUBLIC DISCLOSURE

July 11, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Croghan Colonial Bank
RSSD# 362717

323 Croghan Street
Fremont, Ohio 43420

Federal Reserve Bank of Cleveland

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

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

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

The major factors and criteria contribution to this rating include:

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

The previous CRA examination conducted June 17, 2013 resulted in a "Satisfactory" performance rating.

SCOPE OF EXAMINATION

The Croghan Colonial Bank (Croghan) Community Reinvestment Act (CRA) performance was evaluated using the standards for intermediate small bank procedures under Regulation BB.

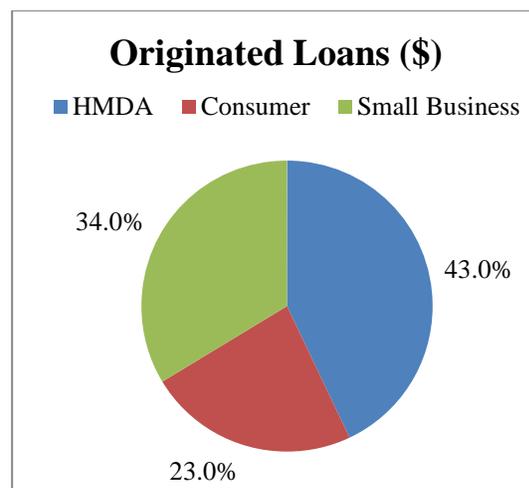
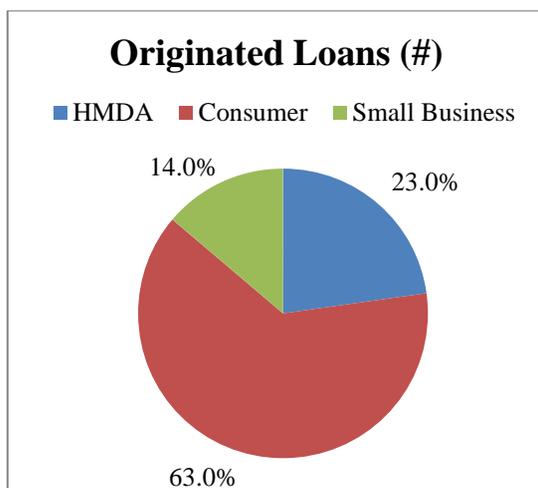
Croghan’s CRA performance was evaluated based on lending data for the period of January 1, 2014 to December 31, 2015. The loan products evaluated include small business, consumer, and HMDA lending. HMDA loans are comprised of home purchase, refinance, home improvement, and multi-family.

For the Non-metropolitan Ohio assessment area, HMDA loans included home purchase, refinance, and home improvement. Consumer loans included home equity and motor vehicle loans. Small business loans were also evaluated.

For the Toledo assessment area review, HMDA loans were combined due to the lack of volume of each individual loan type. Consumer loans included motor vehicle loans exclusively due to the limited number of other consumer loans. There were an insufficient number of small business loans to analyze during the review period.

The following table and charts illustrate the volume and distribution of loans originated during the evaluation period.

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
HMDA	652	76,547
Consumer	1818	41,751
Small Business	395	60,039
Total	2,865	178,337



Based on the total loan volume by dollar amount and the composition of the loan portfolio, HMDA received the most weight, followed by consumer and small business lending.

Croghan has two assessment areas throughout Ohio, including:

- Non-metropolitan Ohio (Non-MSA Ohio), which includes the entireties of Ottawa, Sandusky, Seneca, Huron, and Erie Counties.
- Toledo, OH MSA (Toledo MSA), which includes the entireties of Lucas and Wood Counties. Three census tracts of Henry County are included in this assessment area.

Croghan's assessment area in Non-MSA Ohio was given the greatest weight in this evaluation, as it contained the largest percentage of branches and originated the largest amount of loans (by number and amount). Croghan's main office is located in Fremont, Ohio and 16 of Croghan's 17 offices (94.1%) are located within this assessment area. The size and financial condition of the institution, lending opportunities in the assessment area, and competition with other financial institutions were also considered in the bank's performance context. Two new community contacts were conducted and two recently completed community contacts were reviewed to provide context to the demographic and economic characteristics of the assessment areas in which the bank operates. Both assessment areas received a full-scope review.

For the purpose of this evaluation, geographic and borrower distribution were weighted equally, since the assessment areas include a significant number of low-and moderate-income census tracts and low- to moderate-income households and families.

In some cases, information for originated loans could not be provided by the bank. Therefore, the loan volumes used for borrower distribution are based on a sample of originated loans and are lower than the number of originated loans listed above.

DESCRIPTION OF INSTITUTION

The Croghan Colonial Bank is a full-service banking institution and is the sole banking subsidiary and the primary holding company asset of Croghan Bancshares, Inc., also located in Fremont, Ohio. As of March 31, 2016, Croghan reported \$792 million in total assets, which is significantly higher than the previous examination date with total assets of approximately \$630 million. This increase in assets of 27.5% is attributed to the acquisition of National Bank of Ohio (NBO) in December 2013.

Croghan is a full service retail bank offering deposit accounts; residential mortgages; consumer, commercial, and small business loans; and home equity lines of credit. The bank serves its total assessment area through 17 branch offices and a loan production office (LPO). The majority of Croghan's branches are located in Non-MSA Ohio (16 offices). The main office and four branches are located in Fremont in Sandusky County. Two offices are located in Clyde and Green Springs in Sandusky County. Three of the new branches resulting from the 2013 acquisition are located in Oak Harbor, Curtice, and Port Clinton in Ottawa County. An existing office in Port Clinton was closed, while an additional office was opened in downtown Port Clinton in 2015. In Seneca County, there are two branches located in Tiffin and in Huron County, there are three branches located in Bellevue, Monroeville, and Norwalk. There are no branches located in Erie County.

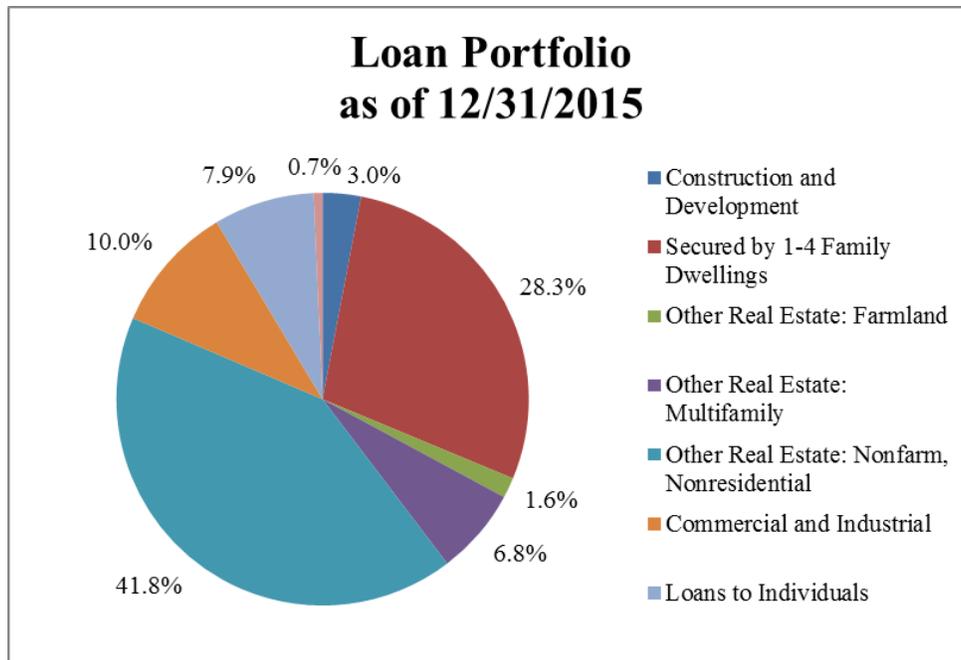
The Toledo MSA includes one branch and one loan production office. The branch office was acquired in Oregon in Lucas County in 2013 as a result of the NBO acquisition. The bank moved its loan production office to Maumee in 2015. There are no branches located in Wood and Henry Counties.

All of Croghan's branches have automated teller machines (ATMs), with the exception of the main office banking center. Fourteen of the ATMs are cash dispensing-only and four are full-service machines. Two of the cash dispensing machines are stand-alone ATMs.

As of December 31, 2015, Croghan's net loans and leases represented 67.0% of total assets. The following shows the loan portfolio composition and trend as of December 31, 2015.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2015		12/31/2014		12/31/2013	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	16,110	3.0%	6,561	1.3%	11,711	2.4%
Secured by One- to Four- Family Dwelli	150,384	28.3%	166,452	34.1%	176,383	36.7%
Other Real Estate: Farmland	8,354	1.6%	8,617	1.8%	10,305	2.1%
Other Real Estate: Multifamily	36,019	6.8%	38,431	7.9%	33,050	6.9%
Other Real Estate: Nonfarm nonresident	222,000	41.8%	184,056	37.7%	174,978	36.5%
Commercial and Industrial	53,092	10.0%	47,209	9.7%	38,293	8.0%
Loans to Individuals	41,820	7.9%	33,209	6.8%	30,979	6.5%
Agricultural Loans	3,711	0.7%	3,345	0.7%	4,348	0.9%
Total	\$531,490	100.00%	\$487,880	100.00%	\$480,047	100.00%

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



Croghan's investment portfolio as of March 31, 2016 was \$181,637, which represented 23.0% of total assets. Investments in U.S. Treasuries and Agencies account for 45.5% of investments, municipal securities comprise 52.1% of investments, with the remaining 2.4% comprised of all other investments.

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

DESCRIPTION OF ASSESSMENT AREAS

Croghan has two assessment areas within Ohio for CRA purposes: Non-MSA Ohio consists of the entireties of Ottawa, Sandusky, Seneca, Huron, and Erie Counties and the Toledo MSA is comprised of the entireties of Lucas and Wood Counties. The Toledo MSA also includes three of Henry County's seven census tracts. Henry County is a contiguous non-MSA county.

Croghan's assessment areas consist of 233 census tracts. Specifically, the assessment areas contain 27 low-, 37 moderate-, 108 middle-, and 58 upper-income census tracts, as well as three unknown tracts. The bank's main office and fifteen branches are located in Non-MSA Ohio. The main office and 11 branches are located in middle-income census tracts. One branch is located in a moderate-income census tract and three branches are located in upper-income census tracts. None of Non-MSA Ohio's middle-income tracts are designated as distressed or underserved. Croghan has one branch located in an upper-income tract in the Toledo MSA.

Lucas County has the largest population of all counties in the assessment areas, with Toledo as the county seat. Since the previous evaluation, Croghan expanded its assessment areas as a result of the NBO acquisition to include Lucas County. According to the 2010 U.S. Census Bureau Report, the population in Lucas County was 441,815. The majority of Lucas County is urban land use, which could impact the level of lending in the assessment area. Competition is high, as several major regional banks operate in this area. Croghan has a loan production office in an upper-income census tract in Maumee in Lucas County.

Erie County has the largest population of all counties in Non-MSA Ohio, with Sandusky as the county seat. According to the 2010 U.S. Census Bureau Report, the population in Sandusky was 77,079. The counties' land use in Non-MSA Ohio is mainly cropland, which could impact the level of lending in the assessment area.

As of June 30, 2015, the Federal Deposit Insurance Corporation (FDIC) reported 35 insured financial institutions operating within Erie, Henry, Lucas, Ottawa, Sandusky, Seneca, and Wood Counties. The FDIC's market share report indicates that Croghan is ranked sixth, holding 4.6% of the market share of deposits.¹ The following table illustrates the deposit market share for the top 10 financial institutions in the counties.

¹ <http://www2.fdic.gov/sod/sodMarketBank.asp>

#	Financial Institution	Deposit Market Share
1	The Huntington National Bank	18.3%
2	Fifth Third Bank	18.1%
3	KeyBank National Association	11.4%
4	PNC Bank National Association	9.0%
5	Citizens Bank National Association	4.9%
6	The Croghan Colonial Bank	4.6%
7	Civista Bank	4.5%
8	Signature Bank, National Association	4.4%
9	Waterford Bank, NA	3.3%
10	First Federal Bank of the Midwest	2.9%

Community Contacts

One community contact interview was conducted in Non-MSA Ohio to provide additional information regarding the credit needs and to provide context to the demographic and economic conditions of the local community. The interview was with an economic development organization in Sandusky County that promotes economic development. According to the contact, Sandusky County was recently recognized in a project management trade magazine for job growth and number of available jobs in all industries. Accordingly, local financial institutions have opportunities to serve their communities through flexible financing programs and community development initiatives.

A previous interview with another economic development organization in Seneca County that provides guidance for the planning and development of land use, infrastructure, and economic growth in Seneca County provided additional performance context. According to the contact, the demographic characteristics have remained the same for the last several years, with young adults leaving the area for opportunities that are not available in Seneca County. The greatest needs in Tiffin are affordable quality rental housing, low-income housing, and financial literacy.

One interview with the City of Maumee in Lucas County indicated the residents of Maumee had sufficient access to credit and local financial institutions had sufficient opportunities to provide community development activities. A previous interview conducted in the Toledo MSA with a fair housing advocacy authority provided additional performance context about the lack of marketing and the lack of branch locations in low-and moderate-income tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Croghan’s overall performance under the lending test is considered satisfactory. The loan-to-deposit ratio is reasonable and the bank made a substantial majority of loans in its assessment areas. The geographic and borrower distribution is reasonable for each assessment area.

Loan-to-Deposit Ratio

A financial institution’s loan-to-deposit ratio (LTD) ratio compares the institution’s aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution’s lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing by the total number of quarters.

The following table shows Croghan’s quarterly LTD ratios for the last 12 quarters since the previous evaluation, along with the average LTD ratios for three local peer banks for the same period. The custom peer LTD ratio is the combined aggregate LTD ratio for all three peer banks.

Croghan Colonial Bank Loan-to-Deposit Ratios					
AS OF DATE	CROGHAN COLONIAL BK	CIVISTA BK	SIGNATURE BK NA	OLD FT BKG CO	CUSTOM PEER
December 31, 2015	80.64	93.41	97.39	68.23	86.34
September 30, 2015	78.80	92.69	90.14	64.36	82.40
June 30, 2015	75.67	91.43	91.83	65.90	83.05
March 31, 2015	74.56	80.51	92.25	65.39	79.38
December 31, 2014	73.88	91.88	92.85	68.25	84.33
September 30, 2014	72.68	87.91	90.82	66.96	81.90
June 30, 2014	71.72	86.19	87.55	68.18	80.64
March 31, 2014	66.77	79.89	88.82	67.31	78.67
December 31, 2013	68.32	86.67	87.13	67.88	80.56
September 30, 2013	61.94	84.60	92.93	65.13	80.89
June 30, 2013	61.12	83.37	95.58	65.01	81.32
March 31, 2013	58.73	80.69	93.89	63.84	79.47
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation	70.40	86.60	91.77	66.37	81.58

Croghan’s LTD ratio is reasonable given the bank’s size, financial condition and assessment area credit needs. The bank has averaged a LTD ratio of 70.4% over the past 12 quarters of operation and is below the custom peer group average ratio of 81.6%. Over the past 12 quarters, the bank has steadily increased each quarter beginning with March 31, 2013. When discussing the LTD ratio with bank management, a major driver for the steady increases is growth through branch acquisitions.

Lending in the Assessment Area

Croghan’s HMDA, small business, and consumer loans were analyzed to determine the volume of lending inside and outside the assessment areas.

The following table shows the distribution of loans made inside and outside the assessment areas.

Lending Inside and Outside the Assessment Area

Exam: Croghan Colonial 2016 New

Loan Type - Description	Inside				Outside				Total	
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	\$(000s)
HE - Home Equity	345	93.5	15,389	94.4	24	6.5	916	5.6	369	16,305
MV - Motor Vehicle	1,275	88.0	20,504	80.6	174	12.0	4,941	19.4	1,449	25,445
Total Consumer related	1,620	89.1	35,893	86.0	198	10.9	5,857	14.0	1,818	41,751
CV - Home Purchase - Conventional	361	94.8	40,620	94.5	20	5.2	2,378	5.5	381	42,998
HI - Home Improvement	87	95.6	2,297	97.2	4	4.4	67	2.8	91	2,364
MF - Multi-Family Housing	6	60.0	2,957	38.4	4	40.0	4,749	61.6	10	7,706
RF - Refinancing	165	97.1	19,957	85.0	5	2.9	3,522	15.0	170	23,479
Total HMDA related	619	94.9	65,831	86.0	33	5.1	10,716	14.0	652	76,547
SB - Small Business	116	85.3	25,970	71.1	20	14.7	10,534	28.9	136	36,504
SR - Small Bus. - Secured by Real Estate	247	95.4	22,593	96.0	12	4.6	942	4.0	259	23,535
Total Small Bus. related	363	91.9	48,563	80.9	32	8.1	11,476	19.1	395	60,039
TOTAL LOANS	2,602	90.8	150,287	84.3	263	9.2	28,049	15.7	2,865	178,337

As the table indicates, a substantial majority of Croghan's loans both by volume (90.8%) and dollar amount (84.3%) were made inside its delineated assessment areas.

Geographic Distribution of Lending

Croghan's geographic distribution of lending is reasonable. The bank did not have any significant lending gaps within Non-MSA Ohio, but significant gaps were noted in the Toledo MSA. In Non-MSA Ohio, HMDA lending received the greatest weight and lending to geographies was considered adequate for all loans reviewed, except for home purchase lending, which was considered good. Consumer lending received the next greatest weight by volume and lending to geographies was considered adequate. Small business lending was considered adequate. In the Toledo MSA, HMDA lending received the greatest weight and lending to geographies was considered adequate. Motor vehicle lending was assigned the next greatest weight due to volume, but lending was considered poor. The respective analysis can be found within subsequent sections of this report.

In addition to traditional bank products, Croghan originates loans through flexible lending programs. These types of programs can allow financial institutions to address credit needs of low- and moderate-income borrowers in a safe and sound manner. During the review period,

Croghan originated the following number and dollar amount of loans through flexible loan programs:

Flexible Lending Program	Number of Originations	Total Loan Amounts
SBA	8	2,292,242
Welcome Home	14	981,302
Business Grow Now	1	8,584

Borrower Distribution of Lending

Croghan's lending to borrowers of different income categories and lending to businesses of different revenue sizes is considered reasonable. HMDA lending received the greatest weight. Consumer lending received the next greatest weight by volume and home equity and motor vehicle lending was reasonable. Small business lending was reasonable. The respective analysis can be found within subsequent sections of this report.

Response to Consumer Complaints

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

Community Development Test

Croghan's performance under the community development test is adequate. The bank's performance demonstrates 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 the assessment areas.

Croghan conducted all of its community development activities in Non-MSA Ohio. Refer to the performance test conclusions for this assessment area later in the report for details about the bank's community development loans, services, and investments.

Fair Lending or Other Illegal Credit Practices Review

No evidence of discrimination or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE
NON-METROPOLITAN OHIO ASSESSMENT AREA**
(Full-scope Review)

The Non-MSA Ohio assessment area consists of the entirety of Ottawa, Sandusky, Seneca, Huron, and Erie Counties. The assessment area consists of 74 census tracts, of which seven are moderate- (9.5%), 44 are middle- (59.5%), and 22 are upper-income (29.7%). Since the previous examination, Ottawa County, previously part of the Toledo MSA, is now included in Non-MSA Ohio, due to changes by the Office of Budget and Management (OMB).

A majority (16 out of 17) of the banking centers are located in Non-MSA Ohio. None of the middle-income census tracts are listed on the Federal Financial Institutions Examinations Council's list of depressed non-metropolitan middle-income geographies, as defined by the Community Development Financial Institutions for 2014 or 2015.

Ottawa County is directly south of Lake Erie in northern Ohio and is a mixture of cropland (60.2%) and urban areas (8.1%). Port Clinton is the largest city and county seat. The county had a population of 41,428, according to the 2010 U.S. Census.

Sandusky County is directly south of Ottawa County in northern Ohio and is a mixture of cropland (71.6%) and urban areas (5.7%). Fremont is the largest city and county seat. The county had a population of 60,944, according to the 2010 U.S. Census.

Seneca County is directly south of Sandusky County in northern Ohio and is a mixture of cropland (79.4%) and urban areas (5.0%). Tiffin is the largest city and county seat. The county had a population of 56,745, according to the 2010 U.S. Census.

Erie County is directly south of Lake Erie in northern Ohio and is a mixture of cropland (53.4%) and urban areas (12.6%). Sandusky is the largest city and county seat. The county had a population of 77,079 according to the 2010 U.S. Census.

Huron County is directly south of Erie County in northern Ohio and is a mixture of cropland (70.8%) and urban areas (3.9%). Norwalk is the largest city and county seat. The county had a population of 59,626 according to the 2010 U.S. Census.

According to the June 30, 2015 Federal Deposit Insurance Corporation (FDIC) Market Share Report, Croghan had 14.3% of the deposits and is ranked second out of 23 institutions in this market. The FDIC market share report below illustrates the market share held by the top ten financial institutions in Non-MSA Ohio.²

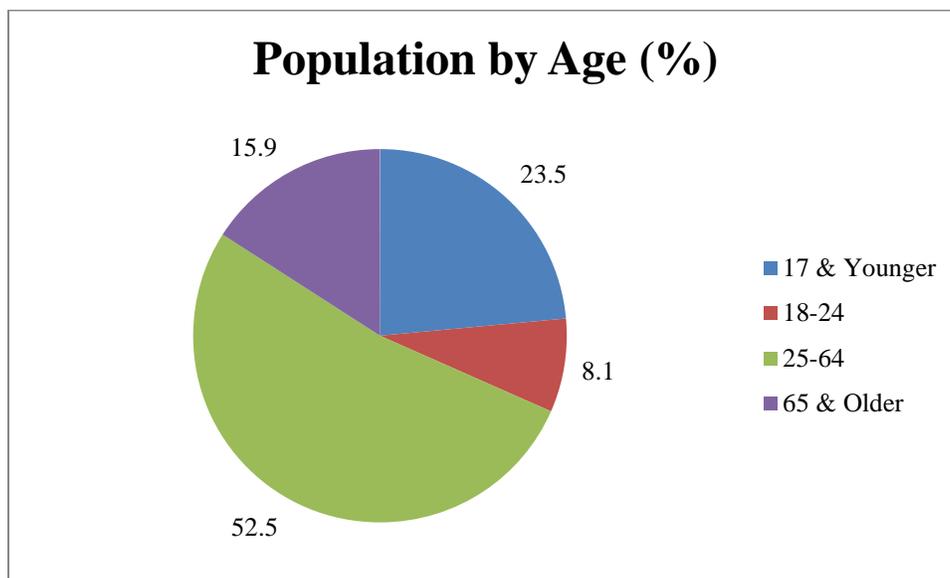
² <http://www2.fdic.gov/sod/sodMarketBank.asp>

#	Financial Institution	Deposit Market Share
1	Civista Bank	14.3%
2	The Croghan Colonial Bank	14.3%
3	PNC Bank National Association	9.4%
4	KeyBank National Association	9.2%
5	Fifth Third Bank	8.1%
6	The Old Fort Banking Company	7.4%
7	The Huntington National Bank	5.7%
8	Sutton Bank	5.4%
9	U.S. Bank National Association	5.2%
10	The First National Bank of Bellevue	3.6%

The largest institution by deposit share is Civista Bank, followed by Croghan and PNC Bank, National Association.

Population Characteristics

According to the 2010 U.S. Census Bureau Report, the total population in the assessment area was 295,822. The majority of the assessment area (91.2%) population resides in middle- and upper-income tracts. Also, 76.5% of the population is 18 years of age or older, the legal age to enter into a contract. The table provides further breakdown of the population by age.



According to the U.S. Census Bureau Report, the population from 2010 to 2014 has decreased in each of the five counties included in the assessment area as illustrated in the table below:³

³ <http://factfinder2.census.gov>

County	2010 Population	2014 Population	Population Percent Change
Erie	77,079	75,828	-1.6%
Huron	59,626	58,714	-1.5%
Ottawa	41,428	41,154	-0.7%
Sandusky	60,944	60,179	-1.3%
Seneca	56,745	55,669	-1.9%
Total	295,822	291,544	

Income Characteristics

In 2010, the median family income in the assessment area was \$57,241, which was lower than Ohio’s median family income of \$59,680, but higher than Non-MSA Ohio’s median family income of \$52,573. Based on HUD data, the table below indicates the most recent median family income for Non-MSA Ohio increased from \$55,700 to \$56,900 in 2015.⁴

**Borrower Income Levels
Ohio State Non-Metro**

HUD Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$55,700	0 - \$27,849	\$27,850 - \$44,559	\$44,560 - \$66,839	\$66,840 - & above
2015	\$56,900	0 - \$28,449	\$28,450 - \$45,519	\$45,520 - \$68,279	\$68,280 - & above

The assessment area contains 119,007 households, of which 82,331 or 69.2% are designated as families. Low- and moderate-income families represent 16.2% and 17.2% of all families in this assessment area, respectively, with 8.4% of families below the poverty level, compared to Ohio’s rate of 10.3%.

According to the data from the Economic Research Service of the U.S. Department of Agriculture (USDA), household poverty rates for Ottawa, Sandusky, Seneca, Huron, and Erie Counties were as follows:

⁴ <https://www.huduser.gov/portal/datasets/il/il15/Medians2015.pdf>

County	2013 Poverty Rate	2014 Poverty Rate	Change
Erie Co.	15.0%	13.9%	-7.3%
Huron Co.	14.6%	13.4%	-8.2%
Ottawa Co.	10.4%	10.1%	-2.9%
Sandusky Co.	12.9%	14.5%	12.4%
Seneca Co.	13.9%	17.5%	25.9%
Ohio	15.9%	15.8%	-0.6%
United States	15.8%	15.5%	-1.9%

Approximately 17.5% of Seneca County’s population was in poverty during 2014. This relatively high poverty rate may indicate that individuals, especially those that are low- or moderate-income, may not have sufficient financial resources to obtain loans. Based on the data, the poverty rate for Seneca County is higher than the other four counties in the assessment area. Additionally, the poverty rate is lower in all counties compared to state and national rates, with the exception of Seneca County.

Labor, Employment and Economic Characteristics

The following table illustrates the land use for each county in the assessment area: ⁵

County	Urban	Cropland	Pasture	Forest	Open Water	Bare Mines	Wetlands
Erie	12.6%	53.4%	10.2%	16.2%	2.2%	0.7%	4.8%
Huron	3.8%	70.8%	8.1%	16.3%	0.8%	0.0%	0.1%
Ottawa	8.1%	60.2%	10.9%	7.5%	7.0%	0.7%	5.2%
Sandusky	5.7%	71.6%	10.5%	6.6%	1.4%	0.4%	3.8%
Seneca	5.0%	79.4%	4.3%	10.2%	0.4%	0.3%	0.4%

As indicated above, all five counties within the assessment area are predominantly cropland, followed by pasture and forest. Huron, Seneca, Sandusky, and Ottawa Counties all indicate less than 10.0% of the land is considered urban, which indicates land use for residential, commercial, industrial, or transportation purposes are limited. The remaining amount of land that does not contain housing, businesses, or schools may impact Croghan’s ability to originate all types of loans in this assessment area.

The following table shows primary employment sectors (by number of persons employed in the county) and major employers for each of the counties in the assessment area. ⁶

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

⁶ http://development.ohio.gov/reports/reports_countytrends_map.htm

County	Primary Employment Sectors	Major Employers
Erie	Leisure and Hospitality; Trade, Transportation and Utilities; Manufacturing; Education and Health Services; Local Government and Professional and Business Services	Cedar Fair/Cedar Point, Erie County Government, Firelands Regional Medical Center, Flex-N-Gate/Ventra Sandusky LLC, Freudenberg NOK, International Automotive Components, Kalahari Resorts, Kyklos Bearing Inc, Sandusky City Schools and State of Ohio
Huron	Manufacturing; Trade, Transportation and Utilities; Educational and Health Services; Local Government and Leisure and Hospitality	Berry Plastics/Venture Packaging, Campbell Soup Co/Pepperidge Farm, Fisher-Titus Medical Center, Huron County Government, MTD Products/Midwest Inds, Norwalk Area Health Systems, Norwalk City Schools, and RR Donnelley & Sons Co
Ottawa	Trade, Transportation and Utilities; Leisure and Hospitality; Manufacturing, Local Government; and Education and Health Services	Benton-Carroll-Salem Local Schools, Brush Wellman Inc/Materion Brush, First Energy 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
Sandusky	Manufacturing; Trade, Transportation and Utilities; Educational and Health Services; Local Government and Leisure and Hospitality	Atlas Industries, Bellevue Hospital, Crown Battery, Eaton INOAC, Fremont City Schools, HJ Heinz Co, International Automotive Component, Memorial Hospital, Poly Foam Int'l/Style Crest, Revere Plastics Inc, Sandusky County Government and Whirlpool Corp
Seneca	Manufacturing; Trade, Transportation and Utilities; Educational and Health Services; Local Government and Leisure and Hospitality	Dorel Industries/Americanwood Ind, Fostoria City Schools, FRAM Group Operations LLC, Heidelberg College, Mercy Hospital of Tiffin, National Machinery LLC, Roppe Corp, State of Ohio, Tiffin City Schools, Tiffin University, and Toledo Molding & Die Inc

The following table shows the 2014 and 2015 average annual unemployment rate for counties in the assessment area and reflects a stable trend overall.

**Unemployment Rates
Croghan Colonial Bank - Non Metro OH**

Area	Years - Annualized	
	2014	2015
Henry Co.	5.5	5.5 (P)
Erie Co.	6.0	6.1 (P)
Huron Co.	7.8	7.3 (P)
Ottawa Co.	7.9	7.8 (P)
Sandusky Co.	4.9	4.9 (P)
Seneca Co.	4.9	4.9(P)
Ohio	4.9 (D)	4.6 (D)
National	5.4	4.8 (P1)

Not Seasonally Adjusted

D: Reflects Revised Population Controls and Model Reestimation

P: Preliminary as of February 2016

P1: Preliminary as of March 2016

The unemployment rates for Henry, Erie, Huron, and Ottawa Counties are higher than Ohio and the national average for both years. The unemployment rates for Sandusky and Seneca Counties are similar to the state and national averages for both years.

Housing Characteristics

There are 141,119 housing units in the assessment area based on the 2010 U.S. Census. Within the assessment area, 63.7% of the units were owner-occupied, 20.1% were rental units, and 15.7% were vacant. The owner-occupancy rate for this assessment area (63.7%) is slightly higher in comparison to Ohio's rate, where 61.7% of the units were owner-occupied. Additionally, 92.4% are one-to-four family units, 7.1% of which are mobile homes, and 7.77% are multi-family homes. Of these housing types, 9.4% are located in moderate-, 58.6% are located in middle-, and 32.0% are located in upper-income census tracts, which indicates that most of the demand for home mortgage lending may be generated in middle- and upper-income census tracts.

According to the 2010 U.S. Census Data, the median age of the housing stock in the assessment area was 49 years, with 35.8% of the stock built before 1950. In comparison, the median statewide age is 44 years. The oldest housing stock was in Seneca County with a median age of 58 years, while the newest was 39 years in Ottawa County. However, within the assessment area, the median age of housing stock was 61 years in moderate-income tracts; therefore, it appears there could be a significant need for home improvement and rehabilitation loans in moderate-income tracts.

The median housing value in the assessment area is 123,455 with an affordability ratio of 38.0%. The higher the affordability ratio, the more affordable a home is considered. The housing affordability ratio is calculated by dividing median household income by median housing value. The housing stock in the assessment area is more affordable than Ohio's at 34.7%.

Further, based on the 2010 median family income of \$57,241 in the assessment area, approximately 38.5% of the homes valued up to \$104,910 in the assessment area would be considered affordable for low-income individuals and 70.7% of the homes valued up to \$167,857 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed-rate, 30-year loan.

According to RealtyTrac, one in every 961 in Erie County was in foreclosure in July 2016. This was higher than Ohio’s ratio of one in every 1,266 properties. Additionally, foreclosure rates in Sandusky and Seneca Counties are also higher than Ohio’s ratio.⁷

Geography Name	Ratio of Properties Receiving Foreclosure Filings in (July, 2016)
Erie	1:961
Huron	1:1,200
Ottawa	1:1,456
Sandusky	1:936
Seneca	1:1571
Ohio	1:1,266
United States	1:1,532

According to Sperling’s Best Places, the following table depicts the median home cost, housing appreciation in the prior year, and cost of living as a percent of the national average for all counties in Non-MSA Ohio. The cost of living in all five counties of Non-MSA Ohio is lower than the national average cost of living; however, in Sandusky and Seneca Counties, the cost of living is less than that of Ohio’s in comparison to Erie, Huron, and Ottawa Counties, where the cost of living is more in comparison to Ohio.⁸

County	Medium Home Cost	Housing Appreciation	Cost of Living as a Percent of the National Average
Erie	139,000	-.8%	93.0%
Huron	118,000	-.8%	89.4%
Ottawa	135,000	-.7%	92.7%
Sandusky	90,500	-.7%	84.7%
Seneca	99,000	-.8%	86.1%
Ohio	112,400	.5%	88.2%

⁷ <http://www.realtytrac.com/trendcenter/>

⁸ <http://bestplaces.net>

Combined Demographics Report

Assessment Area(s): Non Metro OH 2015

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	13,359	16.2
Moderate-income	7	9.5	6,563	8	1,072	16.3	14,149	17.2
Middle-income	44	59.5	49,463	60.1	4,526	9.2	17,939	21.8
Upper-income	22	29.7	26,305	32	1,343	5.1	36,884	44.8
Unknown-income	1	1.4	0	0	0	0	0	0
Total Assessment Area	74	100.0	82,331	100.0	6,941	8.4	82,331	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	13,246	6,591	7.3	49.8	4,729	35.7	1,926	14.5
Middle-income	82,651	53,652	59.7	64.9	18,090	21.9	10,909	13.2
Upper-income	45,222	29,699	33	65.7	6,246	13.8	9,277	20.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	141,119	89,942	100.0	63.7	29,065	20.6	22,112	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	1,195	10	1,051	9.7	133	14.1	11	6.5
Middle-income	6,718	56.3	6,077	56.1	543	57.6	98	57.6
Upper-income	4,030	33.7	3,702	34.2	267	28.3	61	35.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	11,943	100.0	10,830	100.0	943	100.0	170	100.0
Percentage of Total Businesses:			90.7		7.9		1.4	
	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	17	1.6	17	1.6	0	0	0	0
Middle-income	652	59.8	644	59.6	8	80	0	0
Upper-income	422	38.7	420	38.9	2	20	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,091	100.0	1,081	100.0	10	100.0	0	.0
Percentage of Total Farms:			99.1		.9		.0	

2015 FFIEC Census Data and 2015 D&B Information

The above table further illustrates the demographics of the Non Metropolitan OH assessment area.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
NON-METROPOLITAN OHIO ASSESSMENT AREA**

Lending performance in Non-MSA Ohio is considered to be reasonable. The geographic and borrower distribution of lending received equal weighting and both are considered reasonable.

Details of the bank’s HMDA, small business, and consumer lending can be found in the tables in Appendix B.

Geographic Distribution of Lending

Croghan’s geographic distribution of lending is considered reasonable and no significant gaps in lending were noted. The following table depicts the total loans originated by each tract income level and the number and percentages of census tracts with no lending activity.

Total Loan Types Originated in Assessment Area by Tract Income Level						
Geographies	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown Income	Total
# (%) of Tracts in Assessment Area	NA	7 (9.5%)	44 (59.5%)	22 (29.7%)	1 (1.3%)	74 (100%)
# (%) of Total Originated Loans	NA	128 (5.5%)	1625 (70.1%)	566 (24.4%)	0	2,319 (100%)
# (%) of Tracts with Lending	NA	7 (9.7%)	43 (59.7%)	22 (30.6%)	0	72 (100%)
# (%) of Tracts without Lending	NA	0	1 (50%)	0	1 (50%)	2 (100%)

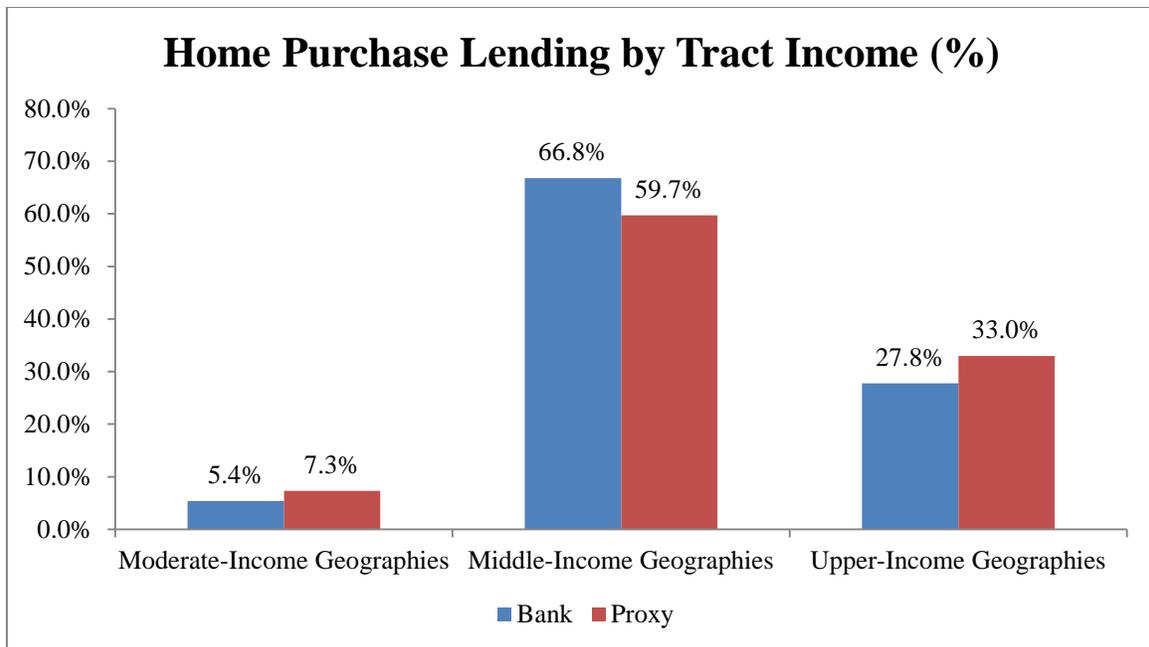
The table indicates that Croghan is penetrating moderate-, middle-, and upper-income tracts at a high rate. The majority of the bank’s branches are located in middle-income tracts and Croghan holds 14.3% of the market share in the area.

HMDA Lending

Home Purchase

Croghan originated 313 home purchase loans which were comprised of 17 loans in moderate-, 209 in middle-, and 87 in upper-income census tracts. Croghan’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy). Poverty levels, lack of affordability, and general economic conditions in the assessment area, which provide limited lending opportunities, were also considered as part of the evaluation.

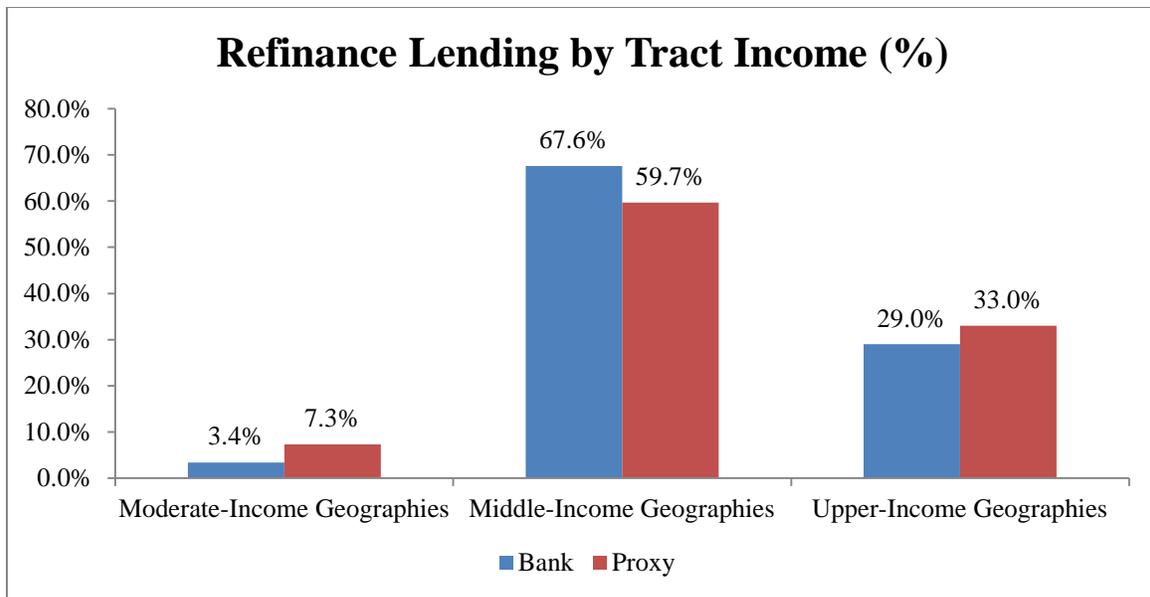
As shown in the following graph, Croghan was comparable to proxy relative to lending in moderate-income tracts. When analyzing 2014 data, home purchase lending in moderate-income tracts (3.2%) was comparable to peer (6.3%). Home purchase lending in middle-income tracts exceeded proxy and lending to upper-income tracts was comparable to proxy. Additionally, only 9.5% of the census tracts are moderate-income tracts within the assessment area and therefore, the distribution of home purchase lending among geographies is considered good.



Refinance

Croghan originated 148 refinance loans, five of which were in moderate-, 100 in middle-, and 43 in upper-income census tracts.

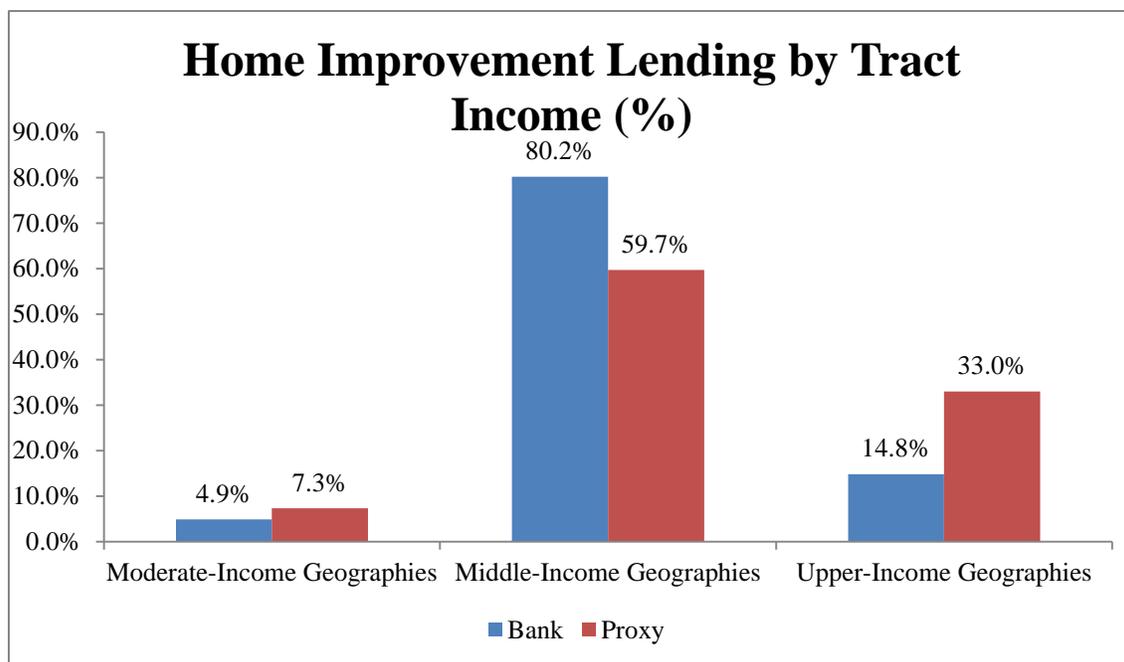
As shown in the following graph, Croghan was comparable to proxy relative to lending in moderate-income tracts. For 2014, refinance lending in moderate-income tracts at 3.1% was comparable to peer at 4.6%. Refinance lending to middle-income tracts exceeded proxy and was comparable to upper-income tracts. Additionally, mortgage lending personnel indicated demand for mortgage refinancing has declined over recent years due in part to prolonged low interest rates. Croghan's geographic distribution of refinance loans is considered adequate.



Home Improvement

Croghan originated 81 home improvement loans, four of which were in moderate-, 65 in middle- and 12 in upper-income census tracts.

As shown in the graph below, Croghan was comparable to proxy relative to lending in moderate-income tracts. For 2014, home improvement lending in moderate-income tracts at 5.9% was greater than peer at 5.3%. Home improvement lending to middle-income tracts exceeded proxy and was comparable to upper-income tracts. Croghan’s geographic distribution of home improvement loans is considered adequate.

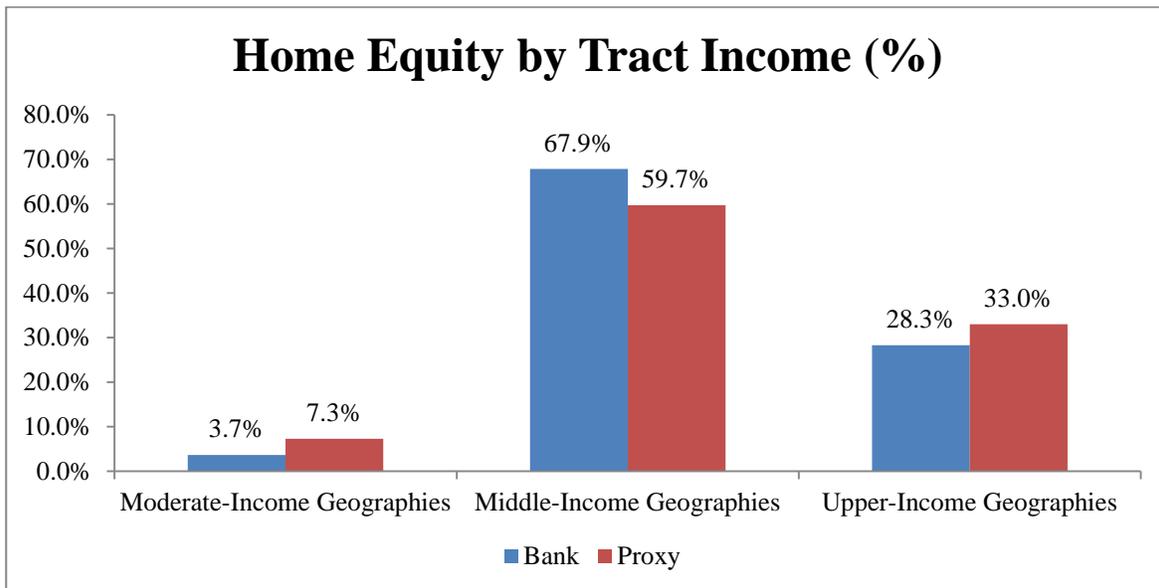


Consumer Lending

Home Equity

Croghan originated a total of 321 home equity loans during the review period, of which 12 were in moderate-, 218 in middle-, and 91 in upper-income census tracts.

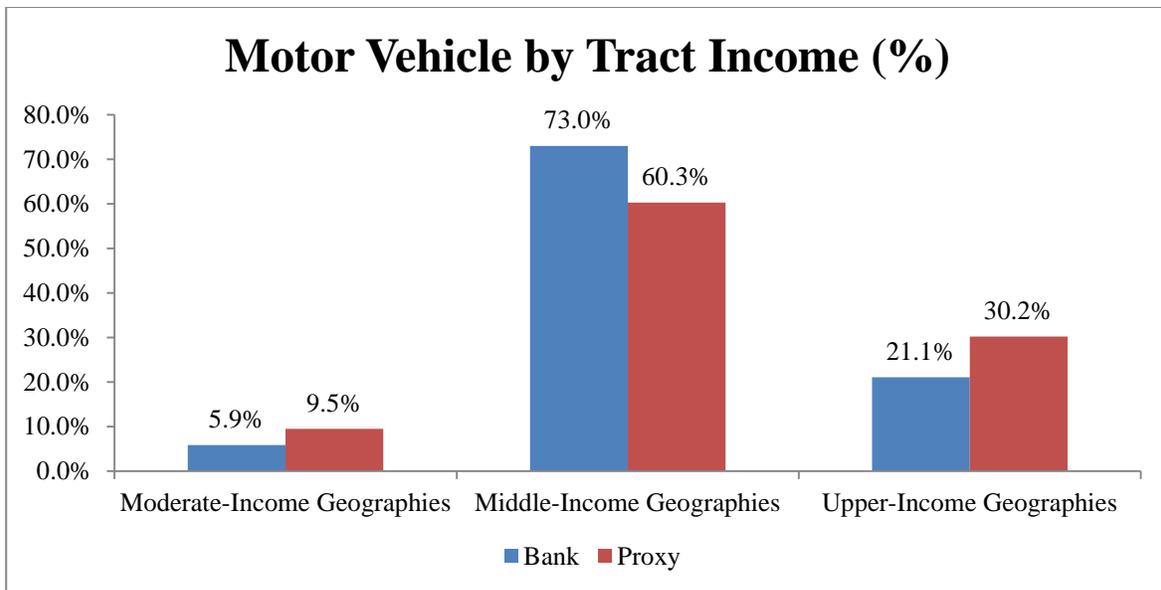
As shown in the graph below, Croghan was below proxy relative to lending in moderate-income tracts. Home equity lending exceeded proxy in middle-income tracts and was comparable in upper-income tracts. Croghan's geographic distribution of home equity lending is considered adequate.



Motor Vehicle

Croghan originated a total of 1,129 motor vehicle loans which comprised of 67 in moderate-, 824 in middle-, and 238 in upper-income census tracts.

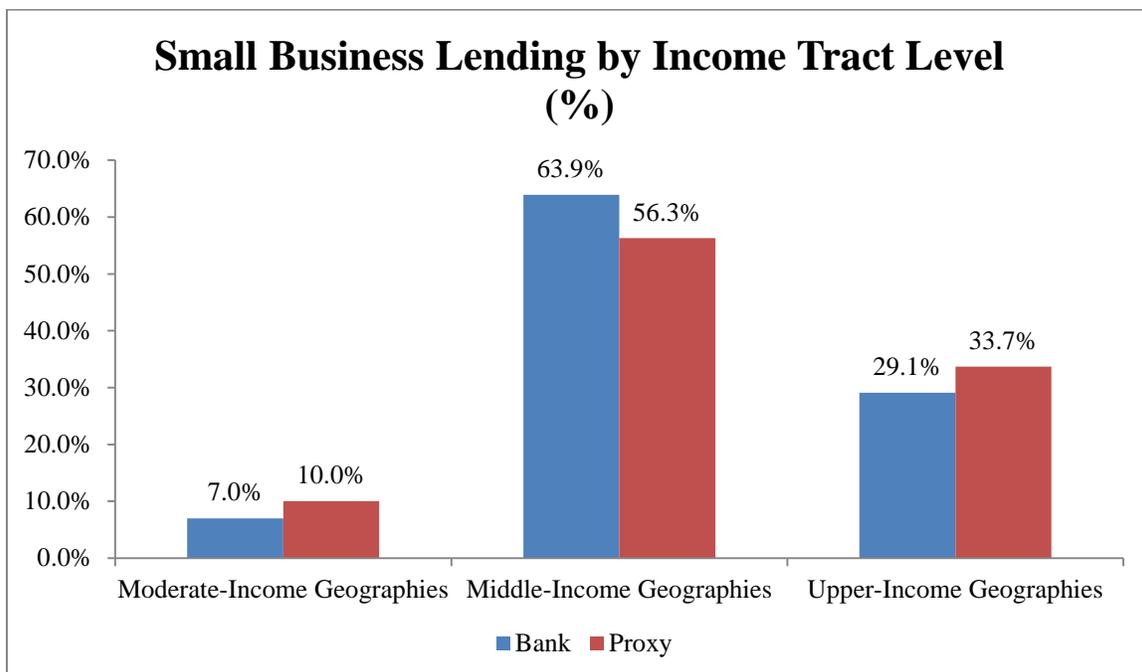
As shown in the following graph, Croghan was below lending in moderate-income tracts. Motor vehicle lending exceeded proxy in middle-income tracts and was below in upper-income tracts. Croghan's geographic distribution of motor vehicle lending is considered adequate.



Small Business Lending

Croghan originated 327 small business loans during the review period, 23 of which were in moderate-, 209 in middle-, and 95 in upper-income census tracts. Croghan’s performance was compared to the number of businesses within the assessment area (proxy).

As depicted in the following graph, the bank’s performance was slightly below proxy in the moderate-income tracts. Small business lending exceeded proxy in middle-income tracts and was slightly below in upper-income tracts. Croghan’s geographic distribution of small business lending is considered adequate.



Distribution by Borrower Income and Revenue Size of the Business

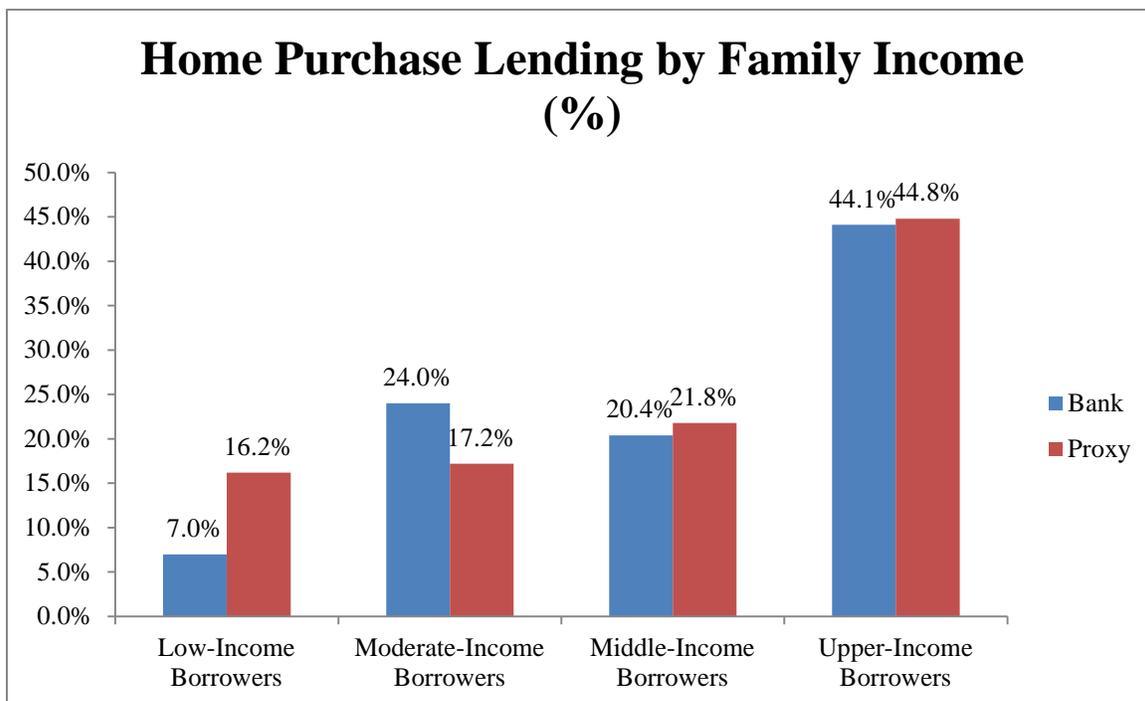
The distribution of loans is considered reasonable based on borrower income and for businesses of different revenue sizes. Most businesses within Non-MSA Ohio have annualized revenues less than \$1 million. Croghan’s performance was compared to the income levels of families in the assessment area (proxy) and the aggregate of all residential lenders (peer) in the market that are HMDA reporters. Based on lending dollar volume, more weight was given to HMDA lending when considering borrower distribution of lending performance in this assessment area. Overall, Croghan’s borrower distribution of lending performance in Non-MSA Ohio is considered reasonable.

HMDA Lending

Home Purchase

Croghan originated a total of 313 home purchase loans, of which 22 were to low-, 75 to moderate-, 64 to middle-, and 138 to upper-income borrowers. There were 14 borrowers with unknown income.

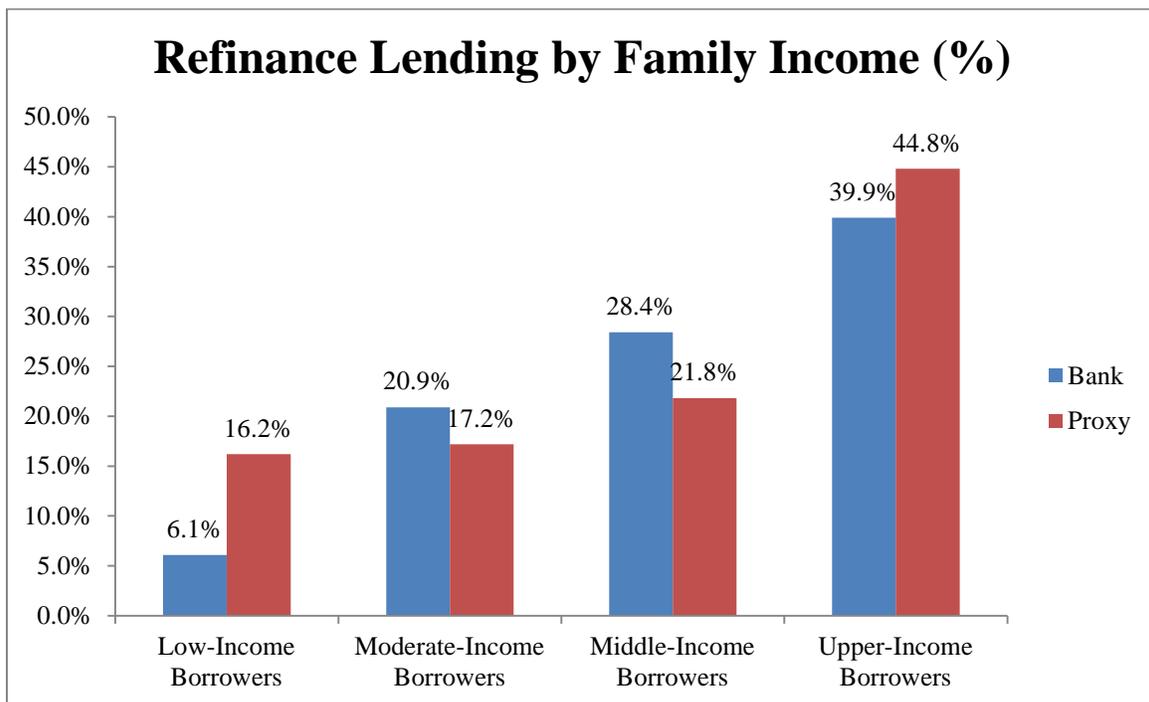
As shown in the graph below, Croghan was below proxy relative to lending to low-income borrowers, but exceeded proxy for lending to moderate-income borrowers. Home purchase lending was comparable to proxy in both middle- and upper-income borrowers. Croghan’s lending to borrowers of different income levels relative to home purchase lending is considered good.



Refinance

Croghan originated a total of 148 refinance loans, of which nine were to low-, 31 to moderate-, 42 to middle-, and 59 to upper-income borrowers. Seven loans were made to borrowers with unknown income.

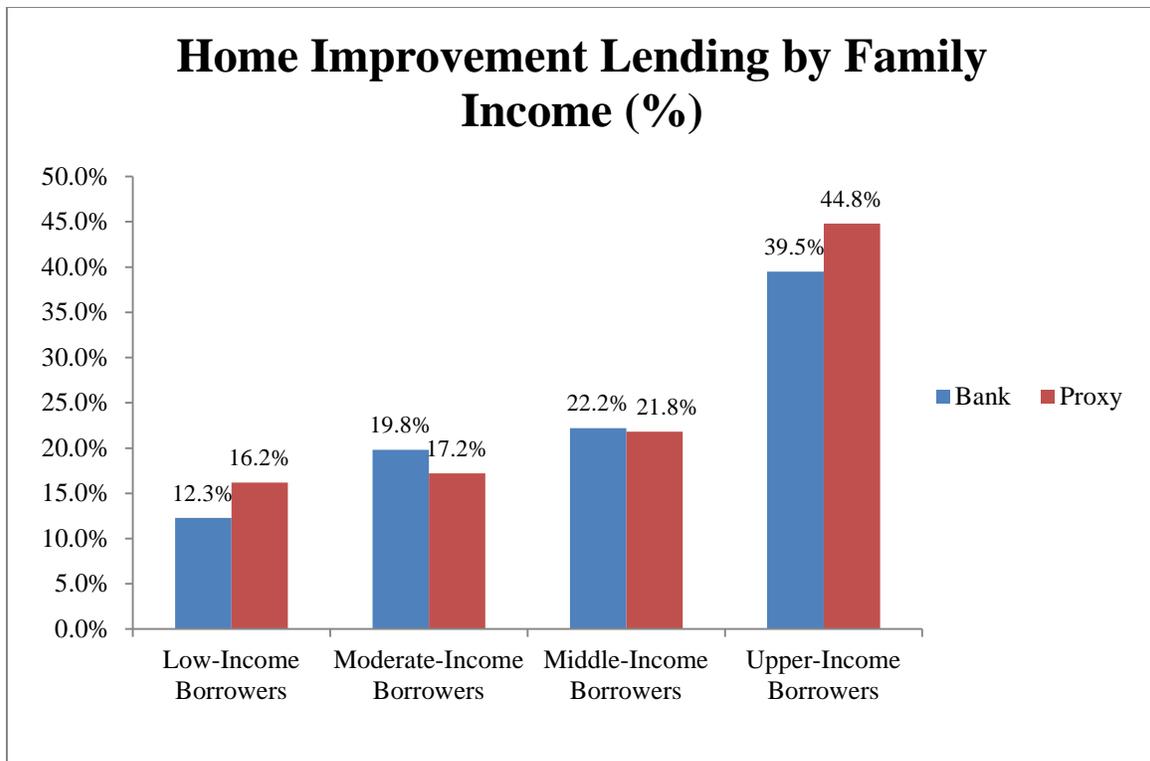
As shown in the graph below, Croghan's lending was below proxy relative to lending to low-income borrowers and exceeded proxy for lending to moderate-income borrowers. Refinance lending exceeded proxy to middle-income borrowers and was comparable to upper-income borrowers. Croghan's lending to borrowers of different income levels relative to refinance lending is considered good.



Home Improvement

Croghan originated a total of 81 home improvement loans which comprised of 10 to low-, 16 to moderate-, 18 to middle-, and 32 to upper-income borrowers. Five loans were made to borrowers with unknown income.

As shown in the following graph, Croghan was slightly less than proxy relative to lending to low-income borrowers and was slightly above proxy relative to moderate-income borrowers. Home improvement lending was comparable to proxy for middle- and upper-income borrowers. Croghan's lending to borrowers of different income levels relative to home improvement lending is considered excellent.

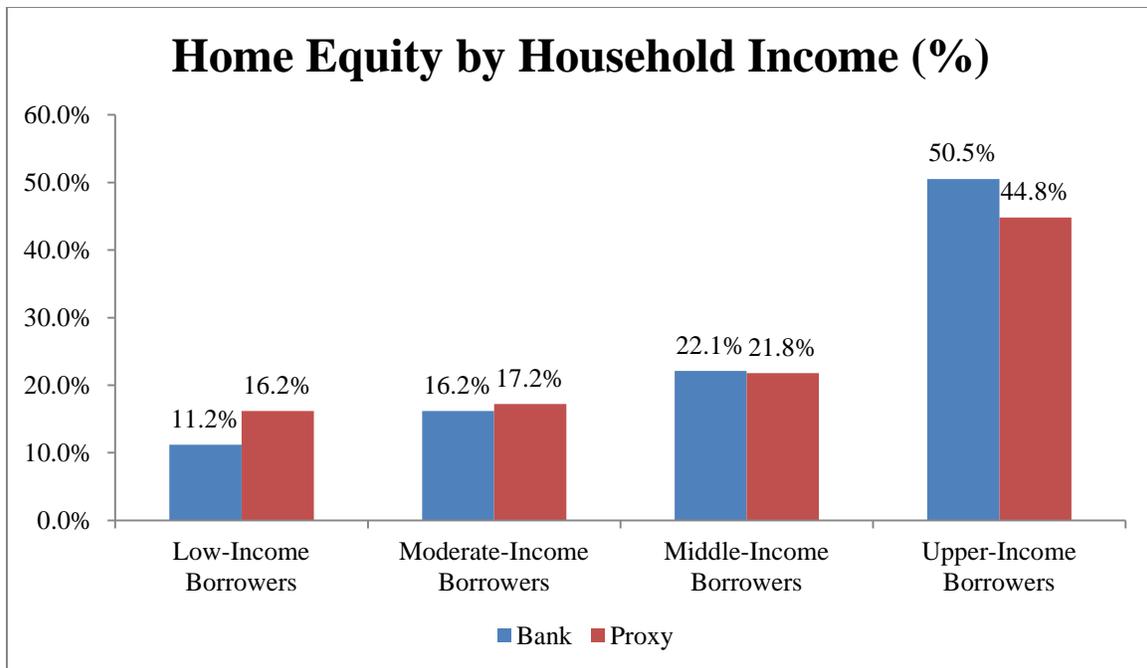


Consumer Lending

Home Equity

Croghan originated a total of 321 home equity loans, of which 36 were made to low-, 52 to moderate-, 71 to middle-, and 162 to upper-income borrowers.

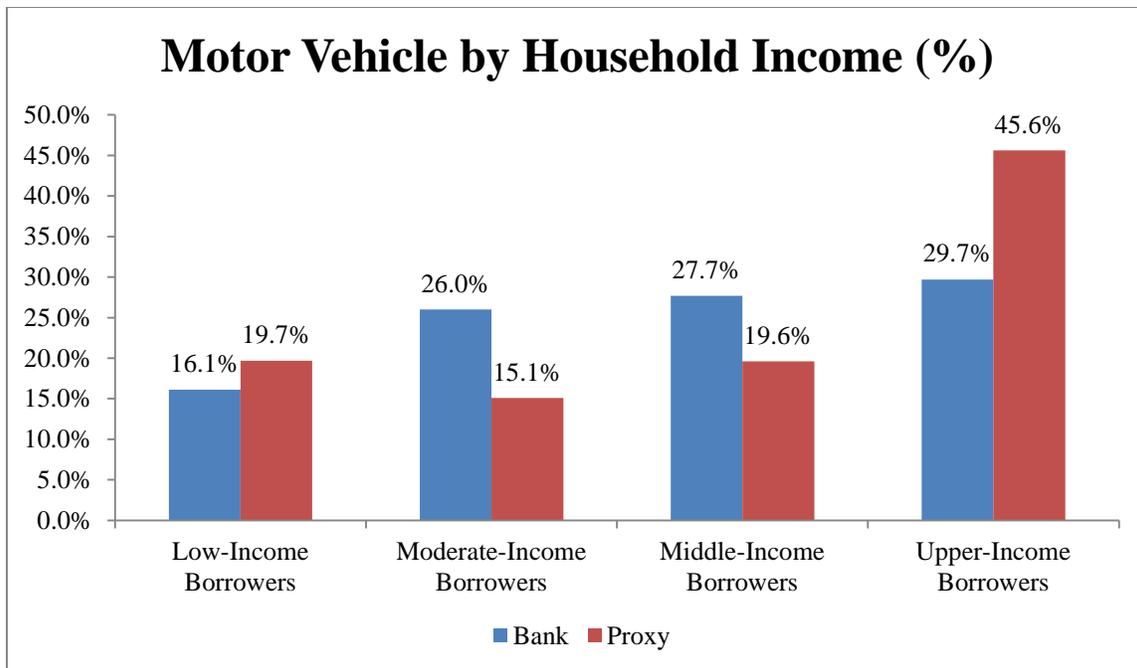
As shown in the following graph, Croghan was below proxy in lending to low-income borrowers and comparable to proxy in lending to moderate-income borrowers. Home equity lending to middle-income borrowers was comparable to proxy and exceeded proxy to upper-income borrowers. Croghan's lending to borrowers of different income levels relative to home equity lending is considered good.



Motor Vehicle

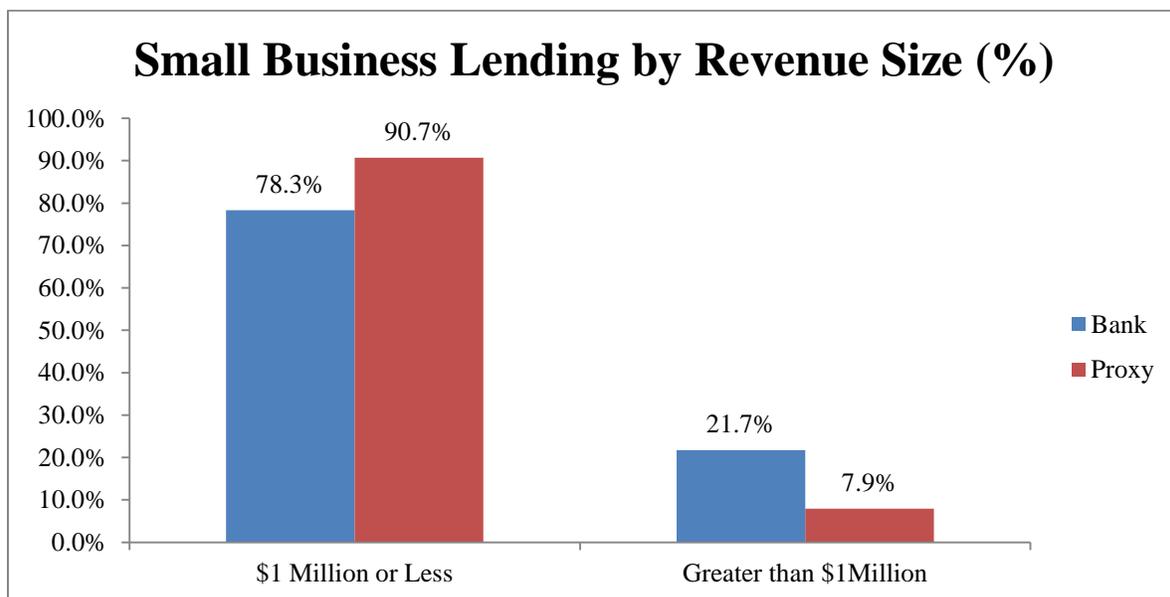
Croghan originated a total of 1,129 motor vehicle loans, of which 182 were made to low-, 293 to moderate-, 313 to middle-, and 335 to upper-income borrowers. Income for six borrowers was unknown.

As shown in the following graph, Croghan is below proxy in lending to low-income individuals and well above proxy in lending to moderate-income borrowers. Motor vehicle lending exceeded proxy to middle-income borrowers, but was below proxy to upper-income borrowers. Croghan's lending to borrowers of different income levels relative to motor vehicle lending is considered good.



Small Business Lending

Croghan originated 327 small business loans for which business revenues were reported. Of these 327 loans, 256 (78.3%) were to small businesses with revenues of \$1 million or less and 71 (21.7%) were to businesses with revenues of more than \$1 million. Businesses with revenues of less than \$1 million account for 90.7% of businesses (proxy). In addition, 68.5% of the total loans were made for loans of \$100,000 or less. The following graph depicts Croghan’s small business lending. Overall, the distribution of loans based on the revenue size for small business lending is considered good.



Community Development Test

Croghan is rated satisfactory under the Community Development Test. The bank's community development performance demonstrates an adequate responsiveness to the community development needs of its assessment area through community development lending, qualified investments, and community development services, considering the bank's capacity and the need and availability of such opportunities in the assessment area.

Community Development Loans

Croghan originated two community development loans totaling \$2,212,000 that benefited the assessment area during the evaluation period by supporting community services.

Community Development Investments

Croghan made donations to five organizations totaling \$40,084, supporting three economic development corporations to benefit low- and moderate-income individuals. The bank also carried a school bond investment with a community development purpose with a prior period balance of \$1,117,415.

Community Development Services

Croghan is an active participant in 34 community development services. Its employees participate in community development services ranging from economic development, community services, and providing affordable housing. Croghan employees have contributed approximately 1,000 hours of community development services since July 2013.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
TOLEDO, OH MSA ASSESSMENT AREA #45780
(Full-scope Review)**

The Toledo, OH MSA Ohio assessment area consists of the entirety of Lucas and Wood County and three census tracts of Henry County. The assessment area consists of 159 census tracts, which are comprised of 27 low-, 30 moderate-, 64 middle-, and 36 upper-income tracts. The income level of two tracts is unknown within this assessment area. Since the previous examination, Lucas County has been added to the assessment area as a result of the acquisition of National Bank of Ohio (NBO). While Henry County is a non-metropolitan area, given the proximity of the three tracts to the Toledo MSA assessment area, those tracts are included in the bank's Toledo MSA assessment area for the purpose of this evaluation. Although Ottawa County was included in the Toledo MSA at the previous examination, it is now included in Non-MSA Ohio due to changes by the Office of Management and Budget (OMB).

One of the bank's 17 banking centers is located in the Toledo MSA, as well as the loan production office (LPO) and one stand-alone cash-dispensing ATM. The Oregon Banking Center is a full-service branch, with a full-service ATM in Lucas County. There are no branches in Wood or Henry County.

None of the middle-income census tracts are listed on the Federal Financial Institutions Examinations Council's list of depressed nonmetropolitan middle-income geographies, as defined by the Community Development Financial Institutions for 2014 or 2015.

According to the June 30, 2015 Federal Deposit Insurance Corporation (FDIC) Market Share Report, Croghan held 0.3% of the deposits and is ranked 19th out of 23 institutions in this market. The FDIC market share report below illustrates the market share held by the top ten financial institutions in the Toledo MSA.⁹

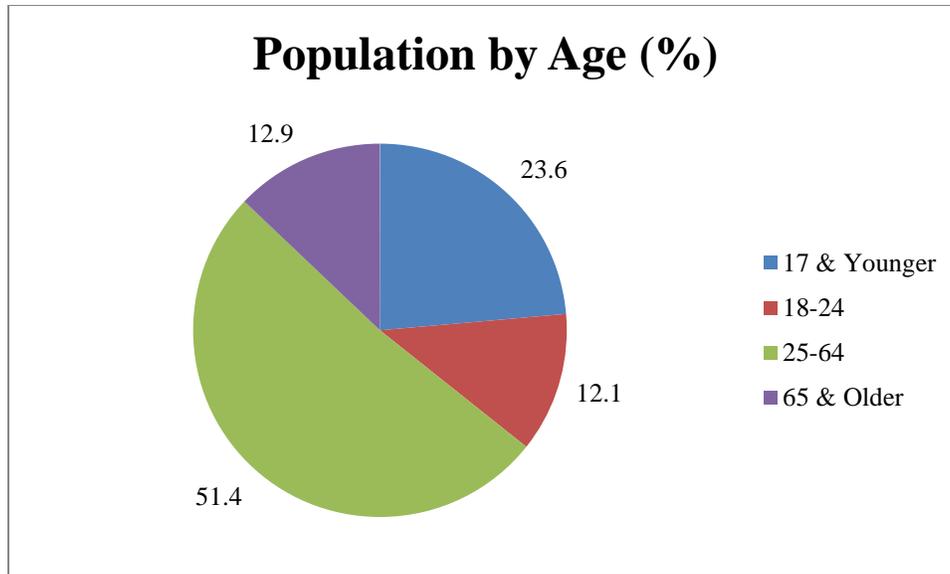
⁹ <http://www2.fdic.gov/sod/sodMarketBank.asp>

#	Financial Institution	Deposit Market Share
1	The Huntington Bank	24.0%
2	Fifth Third Bank	22.7%
3	KeyBank National Association	12.4%
4	PNC Bank National Association	8.9%
5	Citizens Bank National Association	7.1%
6	Signature Bank National Association	6.4%
7	Waterford Bank, NA	4.7%
8	First Federal Bank of the Midwest	3.5%
9	The Henry County Bank	2.3%
10	The Farmers & Merchants State Bank	1.3%
11	The Genoa Banking Company	1.1%
12	The State Bank and Trust Company Company	1.1%
13	Firstmerit Bank National Association	1.0%
14	First Federal Savings and Loan Association	0.7%
15	The Hamler State Bank	0.6%
16	The Union Bank Company	0.5%
17	The Corn City State Bank	0.5%
18	Resolute Bank	0.4%
19	The Croghan Colonial Bank	0.3%

The largest institutions by deposit share are larger regional financial institutions, such as The Huntington Bank (24.0%), Fifth Third Bank (22.7%), Key Bank National Association (12.4%), PNC Bank National Association (8.9%), and Citizens Bank National Association (7.1%).

Population Characteristics

According to the 2010 U.S. Census Bureau Report, the total population in the Toledo MSA was 578,997. The majority of the assessment area population (71.6%) resides in middle- and upper-income tracts. Also, 76.4% of the population is 18 years of age or older, the legal age to enter into a contract. The following graph provides further breakdown of the population by age.



According to the U.S. Census Bureau Report, the population from 2010 to 2014 has decreased in Henry County as illustrated in the table below:

County	2010 Population	2014 Population	Population Percent Change
Lucas	441,815	435,286	-1.5%
Wood	125,488	129,590	3.3%
Henry	28,215	27,937	-1.0%
Total	595,518	592,813	

According to the county profile, Toledo, the largest city in Lucas County, had a population of 287,206 in 2010. Overall, the population in Wood County is increasing and decreasing slightly in Lucas and Henry Counties.

Income Characteristics

In 2010, the Toledo MSA’s median family income was \$58,185, which was lower than Ohio’s median family income of \$59,680 and similar to the complete Toledo, OH MSA median family income of \$58,200. Based on HUD data, the table below indicates the most recent median family income for the Toledo MSA, displaying a slight increase from \$60,800 in 2014 to \$61,700 in 2015.

**Borrower Income Levels
Toledo, Ohio - MSA**

HUD Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2014	\$60,800	0	- \$30,399	\$30,400	- \$48,639	\$48,640	- \$72,959	\$72,960	- & above
2015	\$61,700	0	- \$30,849	\$30,850	- \$49,359	\$49,360	- \$74,039	\$74,040	- & above

The assessment area contains 231,930 households, of which 144,989 or 62.5% are designated as families. Low- and moderate-income families represent 22.2% and 16.8% of all families in this assessment area, respectively, with 12.3% of families below the poverty level, compared to Ohio’s rate of 10.3%.

According to the data from the Economic Research Service of the U.S. Department of Agriculture (USDA), household poverty rates for Lucas, Wood, and Henry Counties were as follows:

County	2013 Poverty Rate	2014 Poverty Rate	Change
Henry Co.	11.20%	10.20%	-8.93%
Lucas Co.	21.60%	20.70%	-4.17%
Wood Co.	13.00%	13.50%	3.85%
Ohio	15.90%	15.80%	-0.63%
United States	15.80%	15.50%	-1.90%

This data shows the poverty rates for Lucas County are higher and the poverty rates for Henry and Wood County are lower when compared to state and national rates. Approximately 21.0% of Lucas County’s population was in poverty during 2013 and 2014. This relatively high poverty rate may indicate that individuals, especially those that are low- or moderate-income, have insufficient financial resources to obtain loans.

Labor, Employment and Economic Characteristics

The following table illustrates land use for each county in the assessment area: ¹⁰

County	Urban	Cropland	Pasture	Forest	Open Water	Bare Mines	Wetlands
Henry	2.8%	87.9%	3.2%	5.2%	0.9%	0.0%	0.1%
Lucas	36.7%	36.6%	1.8%	14.9%	3.0%	0.5%	6.6%
Wood	9.4%	80.4%	3.5%	4.5%	0.9%	0.1%	0.0%

¹⁰ http://development.ohio.gov/reports/reports_countytrends_map.htm

As indicated, the majority of Lucas County is urban and cropland, while the majority of Wood and Henry Counties are cropland.

The following table shows primary employment sectors (by number of persons employed in the county) and major employers for each of the counties in the assessment area.¹¹

County	Primary Employment Sectors	Major Employers
Henry	Manufacturing; Trade, Transportation and Utilities; Local Government; Education and Health Services Leisure and Hospitality	Alex Products, Campbell Soup Co, Filling Memorial Home of Mercy, Henry County Hospital, Liberty Center Schools, Lutheran Home at Napoleon, Napoleon Areas City Schools, Silgan Holdings Inc, Tenneco Inc, and Wal-Mart Stores Inc
Lucas	Education and Health Services; Trade, Transportation and Utilities; Professional and Business Services; Leisure and Hospitality and Manufacturing	Andersons Inc, BP, Carlisle Group/HCR Manor Care, Chrysler Group LLC, City of Toledo, Dana Corp, General Motors Company, Libbey Inc, Lucas County Government, Mercy Health Partners, Owens Corning, Promedica Health System, Toledo City Schools, United Parcel Services Inc, and University of Toledo
Wood	Trade, Transportation and Utilities, Manufacturing; Leisure and Hospitality; Local Government; Education and Health Services	Bowling Green State University, Chrysler Group LLC, First Solar Inc, Great Lakes Window Inc, Magna Int'l/Norplas Inc; Owens Community College; Owens Illinois Inc; Perrysburg Exempted Village Schools; Walgreen Co; Wood County Government; Wood County Hospital Assoc; and WPP PLC/TNS Custom Research

The following table shows the 2014 and 2015 average annual unemployment rate for counties in the assessment area.

**Unemployment Rates
Croghan Colonial Bank- Toledo MSA**

Area	Years - Annualized	
	2014	2015
Henry Co.	5.5	5.5 (P)
Lucas Co.	5.3	5.1 (P)
Wood Co.	4.2	4.1 (P)
Toledo, OH MSA	5.0	4.8 (P)
Ohio	4.9 (D)	4.6 (D)
National	5.4	4.8 (P1)

Not Seasonally Adjusted

D: Reflects Revised Population Controls and Model Reestimation

P: Preliminary as of February 2016

P1: Preliminary as of March 2016

The unemployment rate for Lucas County is above the Toledo MSA and state rates for 2014 and 2015 and below the national average for 2014, but above for 2015. However, Wood County's unemployment rates are lower than the MSA, state, and nation for both years.

¹¹ http://development.ohio.gov/reports/reports_countytrends_map.htm

Housing Characteristics

There were 260,301 housing units in the assessment area, based on the 2010 U.S. Census. Within the assessment area, 59.1% of the units were owner-occupied, 30.0% were rental units, and 10.9% were vacant. The owner-occupancy rate for the Toledo MSA is slightly lower in comparison to Ohio's rate of 61.7%. The type of housing includes 83.1% one-to-four family units, which includes 3.7% mobile homes, and 16.9% multi-family homes. The income tract distribution for these housing types is as follows: 11.4% are located in low-, 19.3% in moderate-, 42.7% in middle-, and 26.6% in upper-income tracts. These numbers indicate that most of the demand for home mortgage lending would be in middle- and upper-income tracts.

According to U.S. Census data, the median age of the housing stock in the assessment area was 50 years, with 34.1% of the stock built before 1950. In comparison, the median statewide age is 44 years. The oldest housing stock was in Lucas County with a median age of 52 years, while the newest was 36 years in Wood County. However, within the assessment area, the median age of housing stock was 61 years in low- and 57 years in moderate-income census tracts; therefore, it appears there could be a significant need for home improvement and rehabilitation loans in low- and moderate-income geographies.

The median housing value in the Toledo MSA is \$129,104 with an affordability ratio of 34.5%. The higher the affordability ratio, the more affordable a home is considered. The housing affordability ratio is calculated by dividing median household income by median housing value. The housing stock in the assessment area was slightly less affordable than in Ohio (34.7%). Further, based on the 2010 median family income of \$58,200 for the Toledo MSA, approximately 37.5% of the homes valued up to \$106,668 in the assessment area would be considered affordable for low-income individuals and 68.4% of the homes valued up to \$170,669 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed-rate, 30-year loan.

According to RealtyTrac, one in every 1,453 properties in Wood County was in foreclosure in July 2016. This was less than Ohio's ratio of one in every 1,266 and higher than the national ratio of one in every 1,532 properties. The foreclosure ratio in Lucas County is similar to Ohio's ratio and higher than the national ratio.¹²

Geography Name	Ratio of Properties Receiving Foreclosure Filings in July 2016
Henry	N/A
Lucas	1:1,224
Wood	1:1,453
Ohio	1:1,266
United States	1:1,532

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

According to Sperling's Best Places, the following table depicts the median home cost, housing appreciation in the prior year, and cost of living for all counties in the assessment area. The cost of living in all three counties is lower than Ohio's average cost of living.¹³

County	Medium Home Cost	Housing Appreciation	Cost of Living as a Percent of the National Average
Henry	111,300	-.7%	87.7%
Lucas	75,000	-.7%	81.0%
Wood	110,400	-.7%	87.7%
Ohio	112,400	.5%	88.2%

The following table further illustrates the demographics of the Toledo MSA.

13 <http://bestplaces.net>

Combined Demographics Report

Assessment Area(s): Toledo OHMSA 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	27	17	13,612	9.4	5,839	42.9	32,150	22.2
Moderate-income	30	18.9	22,795	15.7	4,869	21.4	24,340	16.8
Middle-income	64	40.3	62,229	42.9	5,255	8.4	29,260	20.2
Upper-income	36	22.6	46,344	32	1,800	3.9	59,239	40.9
Unknown-income	2	1.3	9	0	9	100	0	0
Total Assessment Area	159	100.0	144,989	100.0	17,772	12.3	144,989	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	29,729	9,428	6.1	31.7	14,002	47.1	6,299	21.2
Moderate-income	50,186	20,988	13.6	41.8	21,748	43.3	7,450	14.8
Middle-income	111,058	70,453	45.8	63.4	30,371	27.3	10,234	9.2
Upper-income	69,199	52,928	34.4	76.5	11,902	17.2	4,369	6.3
Unknown-income	129	0	0	0	110	85.3	19	14.7
Total Assessment Area	260,301	153,797	100.0	59.1	78,133	30.0	28,371	10.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,553	6.6	1,348	6.4	200	9.1	5	3.8
Moderate-income	3,399	14.5	3,003	14.3	383	17.4	13	9.8
Middle-income	9,731	41.6	8,745	41.5	919	41.8	67	50.4
Upper-income	8,682	37.1	7,939	37.7	696	31.6	47	35.3
Unknown-income	23	0.1	19	0.1	3	0.1	1	0.8
Total Assessment Area	23,388	100.0	21,054	100.0	2,201	100.0	133	100.0
Percentage of Total Businesses:			90.0		9.4		.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.5	2	0.4	1	8.3	0	0
Moderate-income	10	1.7	8	1.4	2	16.7	0	0
Middle-income	348	59.9	342	60.1	6	50	0	0
Upper-income	220	37.9	217	38.1	3	25	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	581	100.0	569	100.0	12	100.0	0	.0
Percentage of Total Farms:			97.9		2.1		.0	

2015 FFIEC Census Data and 2015 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TOLEDO, OH MSA

Lending performance in the Toledo, OH MSA is considered to be reasonable. Both the geographic and borrower distribution of lending received equal weighting and are considered reasonable.

The greatest consideration based on volume was given to HMDA lending, followed by motor vehicle loans. There were not enough small business loans to conduct a meaningful analysis.

Details of the bank’s HMDA and motor vehicle lending can be found in the tables in Appendix B.

Geographic Distribution of Lending

The Toledo MSA includes 27 low-income geographies and 30 moderate-income geographies. The overall geographic distribution of lending in the assessment area is considered reasonable.

Based upon the analysis of the bank’s lending, significant gaps were noted. Twenty of the 27 low-income tracts did not have loans originated and 15 of the 30 moderate-income tracts did not have loans originated. Likewise, numerous middle- and upper-income tracts also did not have lending. The lending gaps are mainly associated with the limited retail branch presence located in the southern half of the county, along with the lack of marketing in the assessment area and the competition from larger financial institutions.

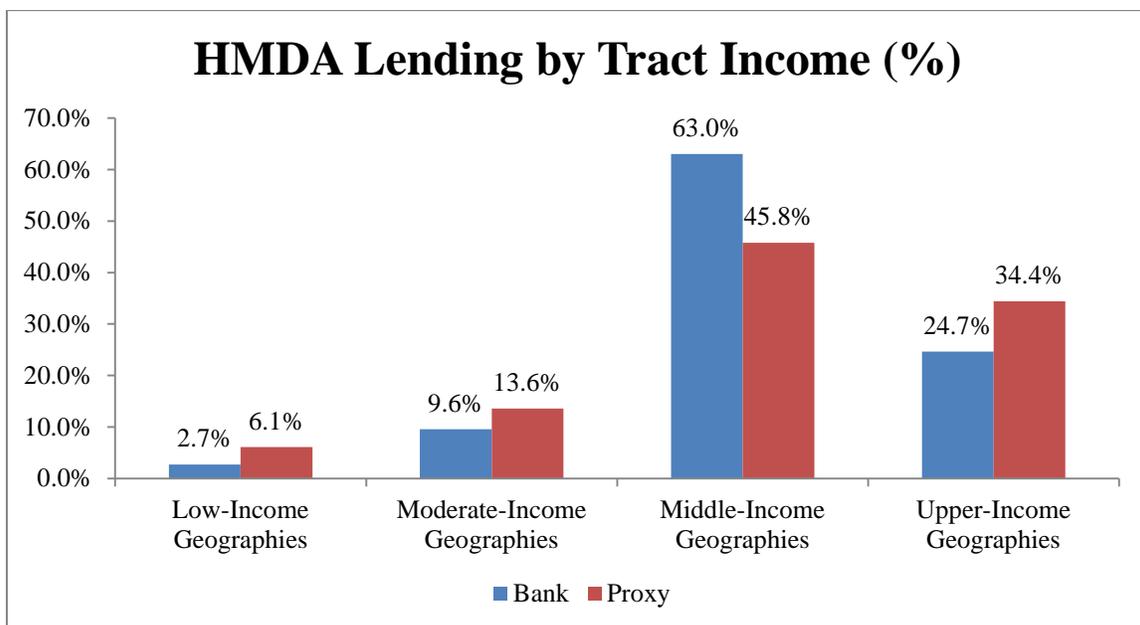
Total Loan Types Originated in Assessment Area by Tract Income Level						
Geographies	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown Income	Total
# (\$%) of Tracts in Assessment Area	27 (17.0%)	30 (18.9%)	64 (40.2%)	36 (22.6%)	2 (1.3%)	159 (100%)
# (%) of Total Originated Loans	7 (3.2%)	20 (9.1%)	123 (56.2%)	69 (31.5%)		219 (100%)
# (%) of Tracts with Lending	7 (7.5%)	15 (16.1%)	45 (48.4%)	26 (28.0%)	0	93 (100%)
# (%) of Tracts without Lending	20 (29.0%)	15 (21.7%)	20 (29.0%)	12 (17.4%)	2 (2.9%)	69 (100%)

The table indicates that Croghan is penetrating middle- and upper-income tracts at a higher rate, while penetration in low- and moderate-income tracts is lower. The one branch is located in an upper-income tract. Considering that Croghan holds 0.3% of the market share in the area, combined with banking competition, it may be more difficult to extend loans, especially in those census tracts without branches.

HMDA Lending

Croghan originated a total of 73 HMDA loans in the assessment area, of which two were made in low-, seven in moderate-, 46 in middle-, and 18 in upper-income census tracts. Croghan's performance was compared to the number of owner-occupied housing units in the assessment area (proxy). Poverty levels, lack of affordability, and general economic conditions in the assessment area, which affect lending opportunities, were also considered as part of the evaluation.

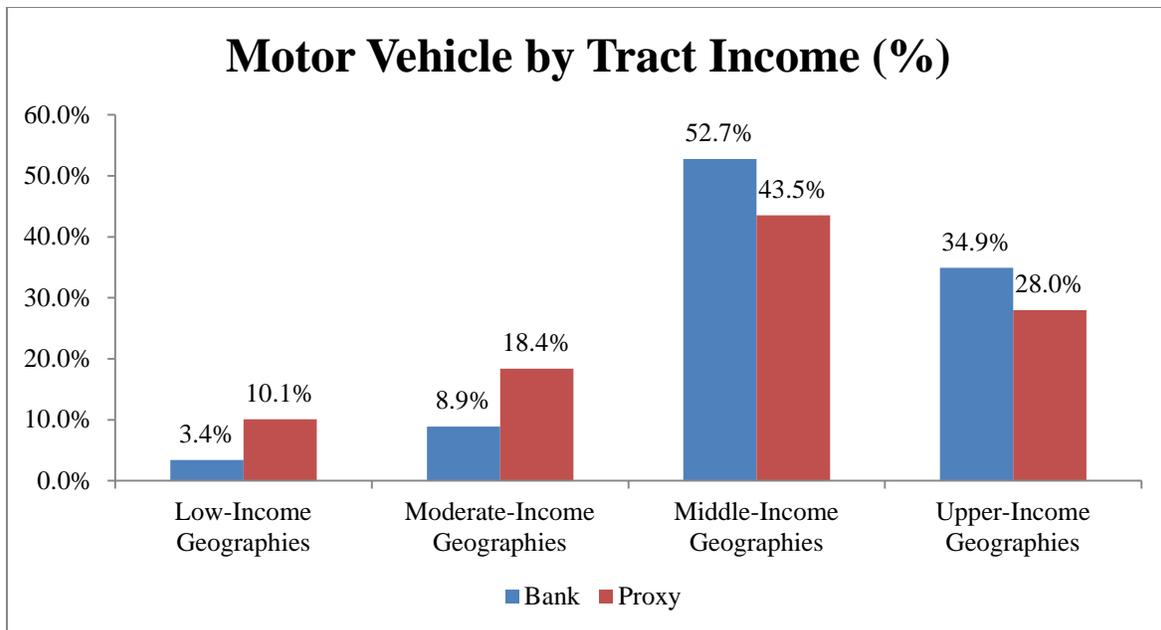
As shown in the graph below, Croghan was below proxy in lending in low- and moderate-income tracts. HMDA lending exceeded proxy in middle-income tracts, but was below proxy in upper-income tracts. Therefore, Croghan's distribution of HMDA lending among geographies is considered adequate.



Consumer Lending

Croghan originated a total of 146 motor vehicle loans in the assessment area of which five were made in low-, 13 in moderate-, 77 in middle-, and 51 in upper-income census tracts.

As shown in the graph below, Croghan was significantly below proxy relative to lending in low- and moderate-income tracts. Motor vehicle lending to middle- and upper-income tracts exceeds the proxy. Therefore, Croghan's geographic distribution of motor vehicle lending is considered poor.



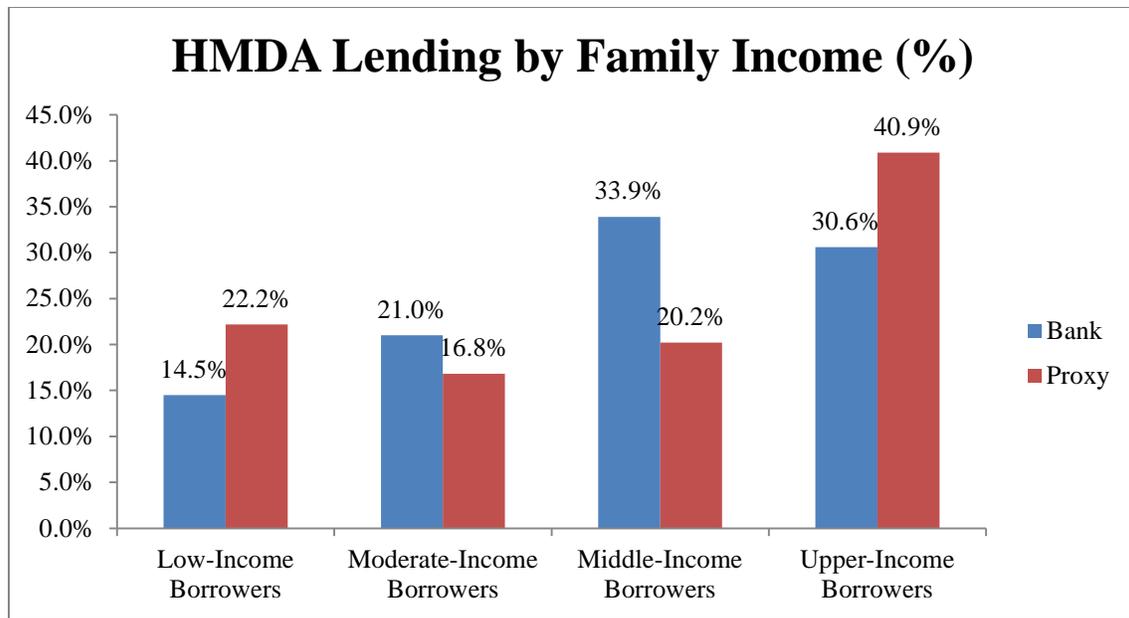
Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is considered reasonable based on borrower income. Croghan’s performance for HMDA loans was compared to the income levels of families in the assessment area (proxy) and for consumer loans to the income levels of households. Based on lending volume, more weight was given to HMDA lending when considering borrower distribution of lending performance in this assessment area. Overall, Croghan’s borrower distribution of lending performance in the Toledo MSA is considered reasonable.

HMDA Lending

Croghan originated a total of 73 HMDA loans in the assessment area, of which nine loans were made to low-, 13 to moderate-, 21 to middle-, and 19 to upper-income borrowers. Performance was adjusted to remove 11 loans with unknown income.

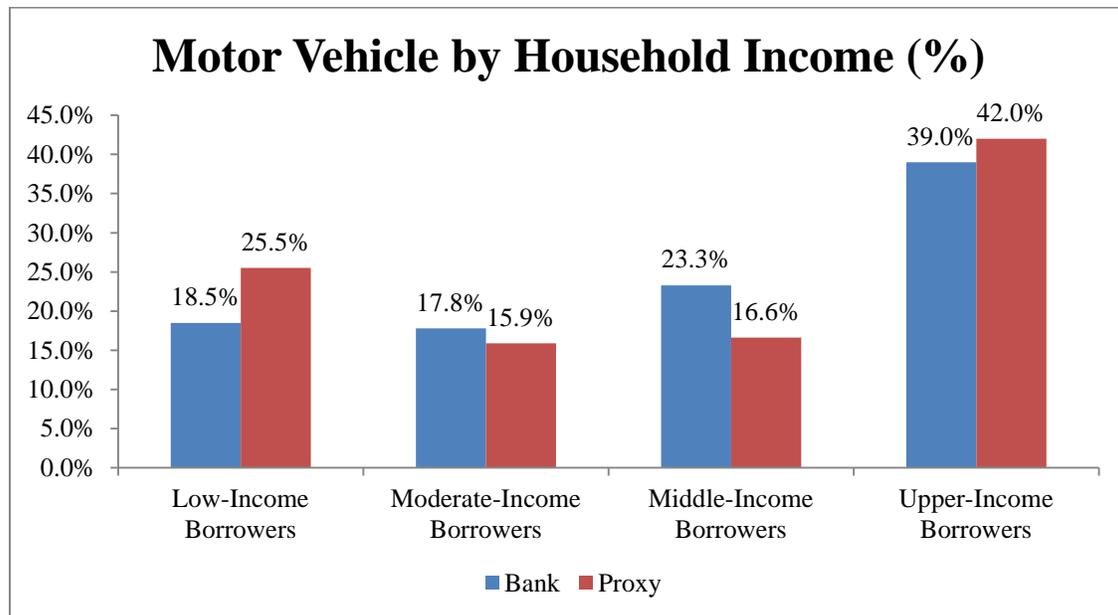
As shown in the following graph, Croghan was below proxy relative to lending to low-income borrowers, but exceeded proxy to moderate-income borrowers. HMDA lending to middle-income borrowers exceeded proxy, but was below proxy to upper-income borrowers. Croghan’s lending to borrowers of different income levels relative to HMDA lending is considered good.



Motor Vehicle

Croghan originated a total of 146 motor vehicle loans in the assessment area, of which 27 were made to low-, 26 to moderate-, 34 to middle-, and 57 to upper-income borrowers.

As shown in the graph below, Croghan was below proxy relative to lending to low-income borrowers and slightly above proxy to moderate-income borrowers. Motor vehicle lending to middle-income borrowers exceeded proxy and was comparable to upper-income borrowers. Croghan's lending to borrowers of different income levels relative to motor vehicle lending is considered good.



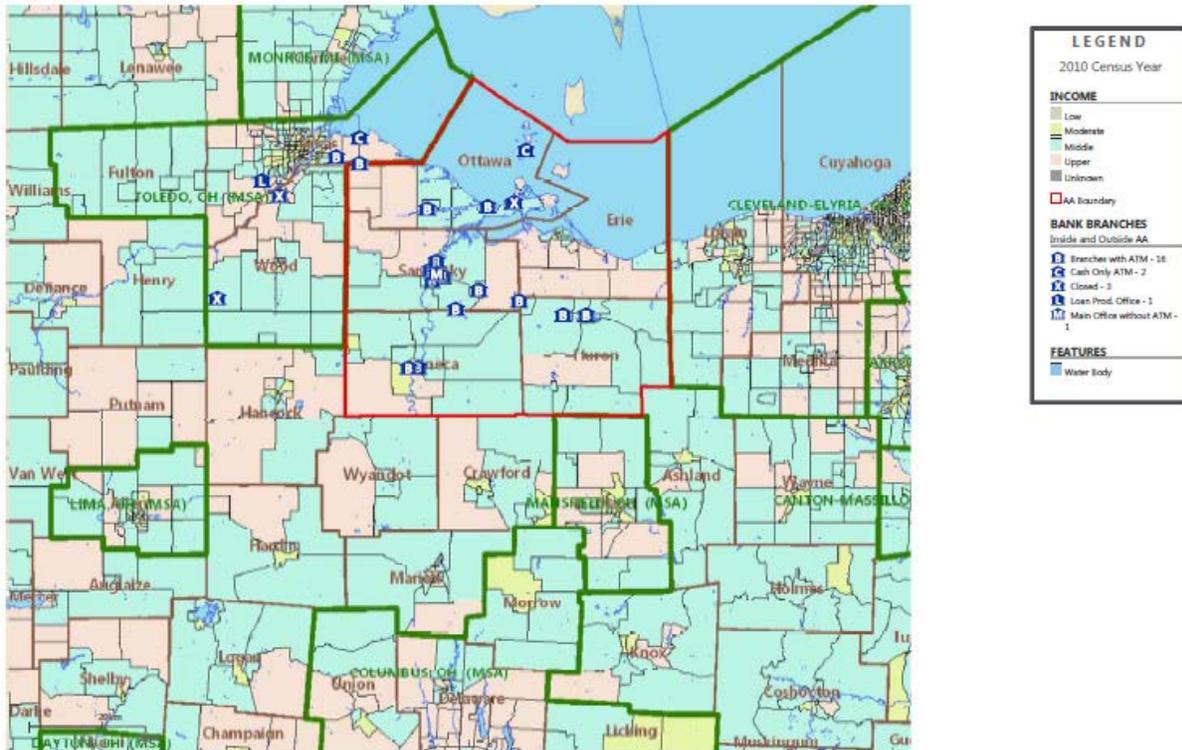
Community Development Test

There were no community development activities during the examination period in this assessment area.

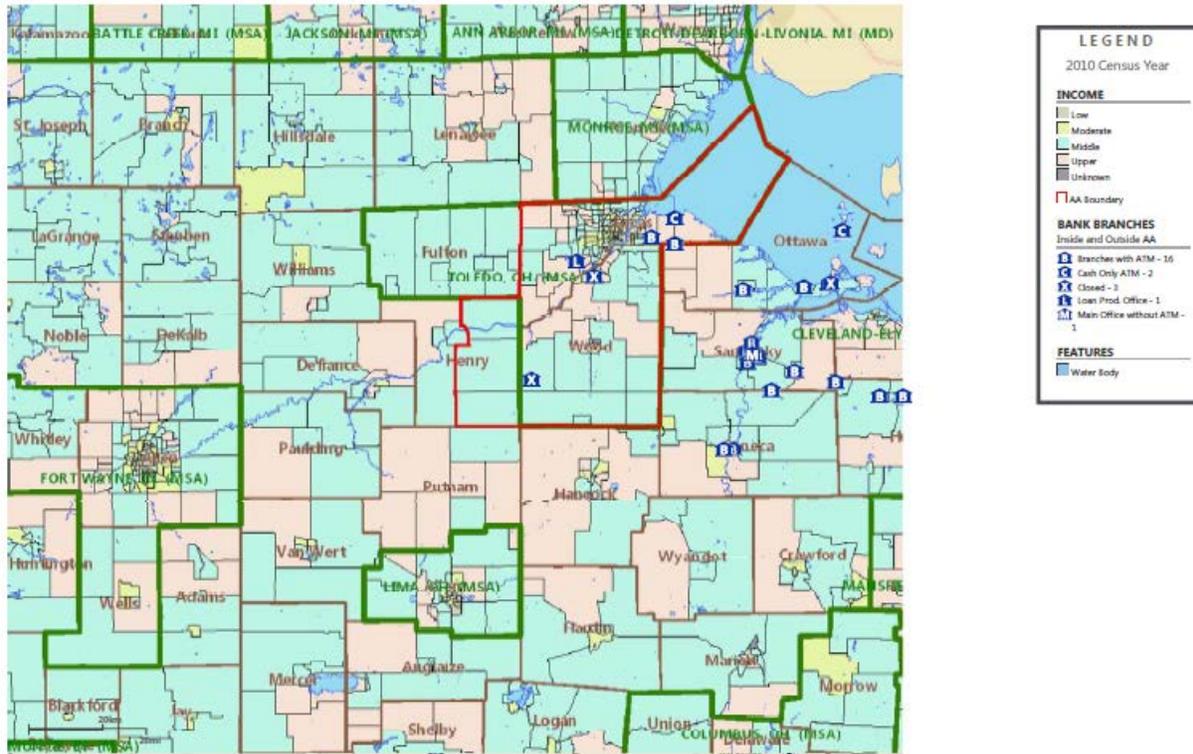
APPENDIX A

ASSESSMENT AREA MAPS

Assessment Area: 2015 Non Metro OH



Assessment Area: 2015 Toledo MSA



APPENDIX B

LENDING TABLES

HMDA Loan Distribution Table

Exam: Croghan Colonial 2016 New

Assessment Area/Group :Non Metro OH, Combined Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	22	7.0%	1,404	3.9%
Moderate	17	5.4%	1,085	3.0%	75	24.0%	5,831	16.3%
Low/Moderate Total	17	5.4%	1,085	3.0%	97	31.0%	7,235	20.2%
Middle	209	66.8%	21,407	59.7%	64	20.4%	6,472	18.1%
Upper	87	27.8%	13,358	37.3%	138	44.1%	19,899	55.5%
Unknown	0	0.0%	0	0.0%	14	4.5%	2,244	6.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	313	100.0%	35,850	100.0%	313	100.0%	35,850	100.0%
Refinance								
Low	0	0.0%	0	0.0%	9	6.1%	561	3.1%
Moderate	5	3.4%	455	2.5%	31	20.9%	2,531	14.0%
Low/Moderate Total	5	3.4%	455	2.5%	40	27.0%	3,092	17.1%
Middle	100	67.6%	10,459	57.7%	42	28.4%	3,926	21.7%
Upper	43	29.1%	7,219	39.8%	59	39.9%	10,161	56.0%
Unknown	0	0.0%	0	0.0%	7	4.7%	954	5.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	148	100.0%	18,133	100.0%	148	100.0%	18,133	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	10	12.3%	95	4.3%
Moderate	4	4.9%	10	0.4%	16	19.8%	379	17.0%
Low/Moderate Total	4	4.9%	10	0.4%	26	32.1%	474	21.3%
Middle	65	80.2%	1,498	67.2%	18	22.2%	589	26.4%
Upper	12	14.8%	722	32.4%	32	39.5%	1,068	47.9%
Unknown	0	0.0%	0	0.0%	5	6.2%	99	4.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	81	100.0%	2,230	100.0%	81	100.0%	2,230	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	3	75.0%	235	23.3%	0	0.0%	0	0.0%
Upper	1	25.0%	775	76.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	4	100.0%	1,010	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,010	100.0%	4	100.0%	1,010	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	41	7.5%	2,060	3.6%
Moderate	26	4.8%	1,550	2.7%	122	22.3%	8,741	15.3%
Low/Moderate Total	26	4.8%	1,550	2.7%	163	29.9%	10,801	18.9%
Middle	377	69.0%	33,599	58.7%	124	22.7%	10,987	19.2%
Upper	143	26.2%	22,074	38.6%	229	41.9%	31,128	54.4%
Unknown	0	0.0%	0	0.0%	30	5.5%	4,307	7.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	546	100.0%	57,223	100.0%	546	100.0%	57,223	100.0%

*Information based on 2010 ACS data

Consumer Loan Distribution Table

Exam: Croghan Colonial 2016 New

Assessment Area/Group :Non Metro OH, Combined Years

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	36	11.2%	1,514	10.4%
Moderate	12	3.7%	398	2.7%	52	16.2%	1,755	12.1%
Low/Moderate Total	12	3.7%	398	2.7%	88	27.4%	3,269	22.5%
Middle	218	67.9%	9,544	65.6%	71	22.1%	2,723	18.7%
Upper	91	28.3%	4,598	31.6%	162	50.5%	8,547	58.8%
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	321	100.0%	14,540	100.0%	321	100.0%	14,540	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	182	16.1%	2,292	13.1%
Moderate	67	5.9%	901	5.1%	293	26.0%	3,960	22.6%
Low/Moderate Total	67	5.9%	901	5.1%	475	42.1%	6,252	35.6%
Middle	824	73.0%	12,603	71.9%	313	27.7%	4,646	26.5%
Upper	238	21.1%	4,036	23.0%	335	29.7%	6,582	37.5%
Unknown	0	0.0%	0	0.0%	6	0.5%	61	0.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,129	100.0%	17,541	100.0%	1,129	100.0%	17,541	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	218	15.0%	3,806	11.9%
Moderate	79	5.4%	1,299	4.1%	345	23.8%	5,715	17.8%
Low/Moderate Total	79	5.4%	1,299	4.1%	563	38.8%	9,521	29.7%
Middle	1,042	71.9%	22,147	69.0%	384	26.5%	7,369	23.0%
Upper	329	22.7%	8,634	26.9%	497	34.3%	15,129	47.2%
Unknown	0	0.0%	0	0.0%	6	0.4%	61	0.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,450	100.0%	32,080	100.0%	1,450	100.0%	32,080	100.0%

CRA Loan Distribution Table

Exam: Croghan Colonial 2016 New

Assessment Area/Group: Non Metro OH, Combined Years

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	4	4.0%	551	2.6%	0	0.0%	0	0.0%	19	8.4%	1,351	6.4%
Low/Moderate Total	4	4.0%	551	2.6%	0	0.0%	0	0.0%	19	8.4%	1,351	6.4%
Middle	57	57.0%	9,636	45.4%	0	0.0%	0	0.0%	152	67.0%	14,923	70.8%
Upper	39	39.0%	11,052	52.0%	0	0.0%	0	0.0%	56	24.7%	4,807	22.8%
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	100	100.0%	21,239	100.0%	0	0.0%	0	0.0%	227	100.0%	21,081	100.0%
By Revenue												
Total \$1 Million or Less	87	87.0%	17,621	83.0%	0	0.0%	0	0.0%	169	74.4%	11,400	54.1%
Over \$1 Million	13	13.0%	3,618	17.0%	0	0.0%	0	0.0%	58	25.6%	9,681	45.9%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	100	100.0%	21,239	100.0%	0	0.0%	0	0.0%	227	100.0%	21,081	100.0%
By Loan Size												
\$100,000 or less	42	42.0%	1,994	9.4%	0	0.0%	0	0.0%	182	80.2%	7,417	35.2%
\$100,001 - \$250,000	34	34.0%	5,529	26.0%	0	0.0%	0	0.0%	23	10.1%	3,680	17.5%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	24	24.0%	13,716	64.6%	0	0.0%	0	0.0%	22	9.7%	9,984	47.4%
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	100	100.0%	21,239	100.0%	0	0.0%	0	0.0%	227	100.0%	21,081	100.0%
By Loan Size and Revenue \$1 Million or Less												
\$100,000 or less	39	44.8%	1,831	10.4%	0	0.0%	0	0.0%	150	88.8%	5,867	51.5%
\$100,001 - \$250,000	29	33.3%	4,809	27.3%	0	0.0%	0	0.0%	9	5.3%	1,340	11.8%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	19	21.8%	10,981	62.3%	0	0.0%	0	0.0%	10	5.9%	4,193	36.8%
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	87	100.0%	17,621	100.0%	0	0.0%	0	0.0%	169	100.0%	11,400	100.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: Croghan Colonial 2016 New

Assessment Area/Group : Toledo MSA, Combined Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	8	16.7%	494	10.4%
Moderate	3	6.3%	1,274	26.7%	8	16.7%	207	4.3%
Low/Moderate Total	3	6.3%	1,274	26.7%	16	33.3%	701	14.7%
Middle	35	72.9%	2,328	48.8%	11	22.9%	605	12.7%
Upper	10	20.8%	1,168	24.5%	13	27.1%	1,353	28.4%
Unknown	0	0.0%	0	0.0%	8	16.7%	2,111	44.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	48	100.0%	4,770	100.0%	48	100.0%	4,770	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	17.6%	244	13.4%	3	17.6%	194	10.6%
Low/Moderate Total	3	17.6%	244	13.4%	3	17.6%	194	10.6%
Middle	10	58.8%	653	35.8%	8	47.1%	405	22.2%
Upper	4	23.5%	927	50.8%	5	29.4%	1,094	60.0%
Unknown	0	0.0%	0	0.0%	1	5.9%	131	7.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	1,824	100.0%	17	100.0%	1,824	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	16.7%	7	10.4%
Moderate	1	16.7%	13	19.4%	2	33.3%	28	41.8%
Low/Moderate Total	1	16.7%	13	19.4%	3	50.0%	35	52.2%
Middle	1	16.7%	20	29.9%	2	33.3%	19	28.4%
Upper	4	66.7%	34	50.7%	1	16.7%	13	19.4%
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	6	100.0%	67	100.0%	6	100.0%	67	100.0%
Multi-Family								
Low	2	100.0%	1,947	100.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	2	100.0%	1,947	100.0%	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%	2	100.0%	1,947	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	1,947	100.0%	2	100.0%	1,947	100.0%
HMDA Totals								
Low	2	2.7%	1,947	22.6%	9	12.3%	501	5.8%
Moderate	7	9.6%	1,531	17.8%	13	17.8%	429	5.0%
Low/Moderate Total	9	12.3%	3,478	40.4%	22	30.1%	930	10.8%
Middle	46	63.0%	3,001	34.9%	21	28.8%	1,029	12.0%
Upper	18	24.7%	2,129	24.7%	19	26.0%	2,460	28.6%
Unknown	0	0.0%	0	0.0%	11	15.1%	4,189	48.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	73	100.0%	8,608	100.0%	73	100.0%	8,608	100.0%

*Information based on 2010 ACS data

Consumer Loan Distribution Table

Exam: Croghan Colonial 2016 New

Assessment Area/Group : Toledo MSA, Combined Years

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	3	12.5%	80	9.4%	5	20.8%	99	11.6%
Moderate	0	0.0%	0	0.0%	2	8.3%	26	3.1%
Low/Moderate Total	3	12.5%	80	9.4%	7	29.2%	125	14.7%
Middle	6	25.0%	221	26.1%	4	16.7%	107	12.6%
Upper	15	62.5%	548	64.5%	13	54.2%	617	72.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	850	100.0%	24	100.0%	850	100.0%
	Motor Vehicle							
Low	5	3.4%	84	2.8%	27	18.5%	286	9.6%
Moderate	13	8.9%	258	8.7%	26	17.8%	407	13.7%
Low/Moderate Total	18	12.3%	341	11.5%	53	36.3%	693	23.4%
Middle	77	52.7%	1,547	52.2%	34	23.3%	523	17.7%
Upper	51	34.9%	1,076	36.3%	57	39.0%	1,668	56.3%
Unknown	0	0.0%	0	0.0%	2	1.4%	79	2.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	146	100.0%	2,964	100.0%	146	100.0%	2,964	100.0%
	Consumer Loan Totals							
Low	8	4.7%	164	4.3%	32	18.8%	385	10.1%
Moderate	13	7.6%	258	6.8%	28	16.5%	434	11.4%
Low/Moderate Total	21	12.4%	421	11.0%	60	35.3%	819	21.5%
Middle	83	48.8%	1,768	46.4%	38	22.4%	631	16.5%
Upper	66	38.8%	1,624	42.6%	70	41.2%	2,285	59.9%
Unknown	0	0.0%	0	0.0%	2	1.2%	79	2.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	170	100.0%	3,813	100.0%	170	100.0%	3,813	100.0%

CRA Loan Distribution Table

Exam: Croghan Colonial 2016 New

Assessment Area/Group: Toledo MSA, Combined Years

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	1	6.3%	128	2.7%	0	0.0%	0	0.0%	1	5.0%	57	3.8%
Low/Moderate Total	1	6.3%	128	2.7%	0	0.0%	0	0.0%	1	5.0%	57	3.8%
Middle	8	50.0%	1,847	39.0%	0	0.0%	0	0.0%	5	25.0%	446	29.5%
Upper	7	43.8%	2,756	58.3%	0	0.0%	0	0.0%	14	70.0%	1,009	66.7%
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	16	100.0%	4,731	100.0%	0	0.0%	0	0.0%	20	100.0%	1,512	100.0%
By Revenue												
Total \$1 Million or Less	15	93.8%	3,831	81.0%	0	0.0%	0	0.0%	18	90.0%	1,412	93.4%
Over \$1 Million	1	6.3%	900	19.0%	0	0.0%	0	0.0%	2	10.0%	100	6.6%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	4,731	100.0%	0	0.0%	0	0.0%	20	100.0%	1,512	100.0%
By Loan Size												
\$100,000 or less	4	25.0%	238	5.0%	0	0.0%	0	0.0%	17	85.0%	974	64.4%
\$100,001 - \$250,000	5	31.3%	911	19.3%	0	0.0%	0	0.0%	3	15.0%	538	35.6%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	7	43.8%	3,582	75.7%	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	16	100.0%	4,731	100.0%	0	0.0%	0	0.0%	20	100.0%	1,512	100.0%
By Loan Size and Revenue \$1 Million or Less												
\$100,000 or less	4	26.7%	238	6.2%	0	0.0%	0	0.0%	15	83.3%	874	61.9%
\$100,001 - \$250,000	5	33.3%	911	23.8%	0	0.0%	0	0.0%	3	16.7%	538	38.1%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	40.0%	2,682	70.0%	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	15	100.0%	3,831	100.0%	0	0.0%	0	0.0%	18	100.0%	1,412	100.0%

*Information based on 2010 ACS data

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 refinancing of home improvement and home purchase loans.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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