

PUBLIC DISCLOSURE

April 24, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Genoa Banking Company
RSSD # 504311

801 Main Street
Genoa, Ohio 43430

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 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 majority of loans and other lending-related activities are inside the assessment area;
- The geographic distribution of loans reflects a poor dispersion throughout the assessment area;
- 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 area and;
- There were no CRA-related complaints filed against The Genoa Banking Company since the previous CRA examination.

The previous CRA examination conducted February 25, 2013 resulted in a "Satisfactory" performance rating.

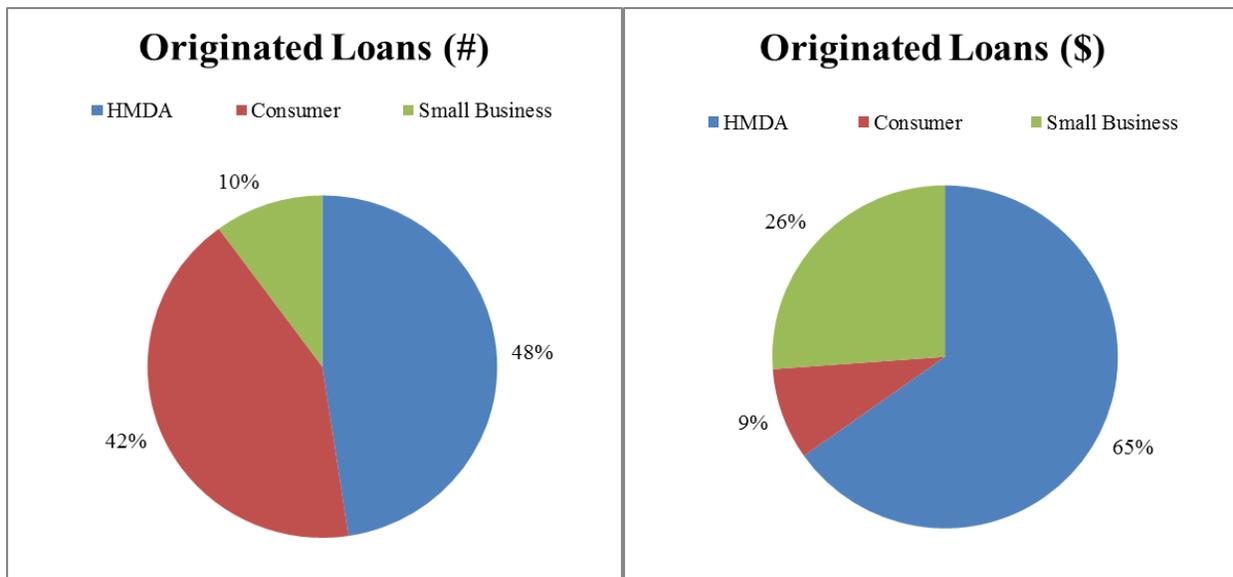
SCOPE OF EXAMINATION

The Genoa Banking Company’s (Genoa) Community Reinvestment Act (CRA) performance was evaluated using the interagency small bank examination procedures under Regulation BB.

Genoa’s CRA performance was evaluated based on lending data for the period of January 1, 2015 to June 30, 2016. The loan products evaluated included HMDA, consumer, and small business loans. HMDA loans are comprised of home purchase, refinance, and home improvement loans. Consumer loans are comprised of home equity, motor vehicle, and other-unsecured loans.

The following table and charts illustrate the volume and distribution of loans originated within Genoa’s assessment area during the evaluation period.

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
HMDA	1,203	161,454
Consumer	1,069	21,401
Small Business	255	64,711
Total	2,527	247,566



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

Genoa has two assessment areas throughout Ohio, including:

- Toledo, Ohio Metropolitan Statistical Area #45780 (Toledo MSA) – Full-scope evaluation
- Non-metropolitan Ohio – Limited-scope evaluation

Genoa's assessment area in the Toledo MSA was given the greatest weight in this evaluation, as it originated the largest amount of loans (by number and amount). A detailed description of each assessment area is presented in subsequent sections of this performance evaluation. The size and financial condition of the institution, lending opportunities in the assessment area, and competition with other financial institutions were also considered in Genoa's performance context. Two community contacts were conducted in the Toledo MSA to provide context to the demographic and economic characteristics of the assessment areas in which the bank operates.

For the purpose of this evaluation, geographic distribution and borrower distribution were weighted equally based on the characteristics of the assessment area. The size and financial condition of the institution, lending opportunities within the assessment area, and competition with other institutions were also considered in Genoa's performance context.

DESCRIPTION OF INSTITUTION

Genoa is the sole banking subsidiary of GenBanc and is located in Genoa, Ohio. As of December 31, 2016, Genoa reported \$326.2 million in total assets, an increase of 26.4% since the previous CRA evaluation.

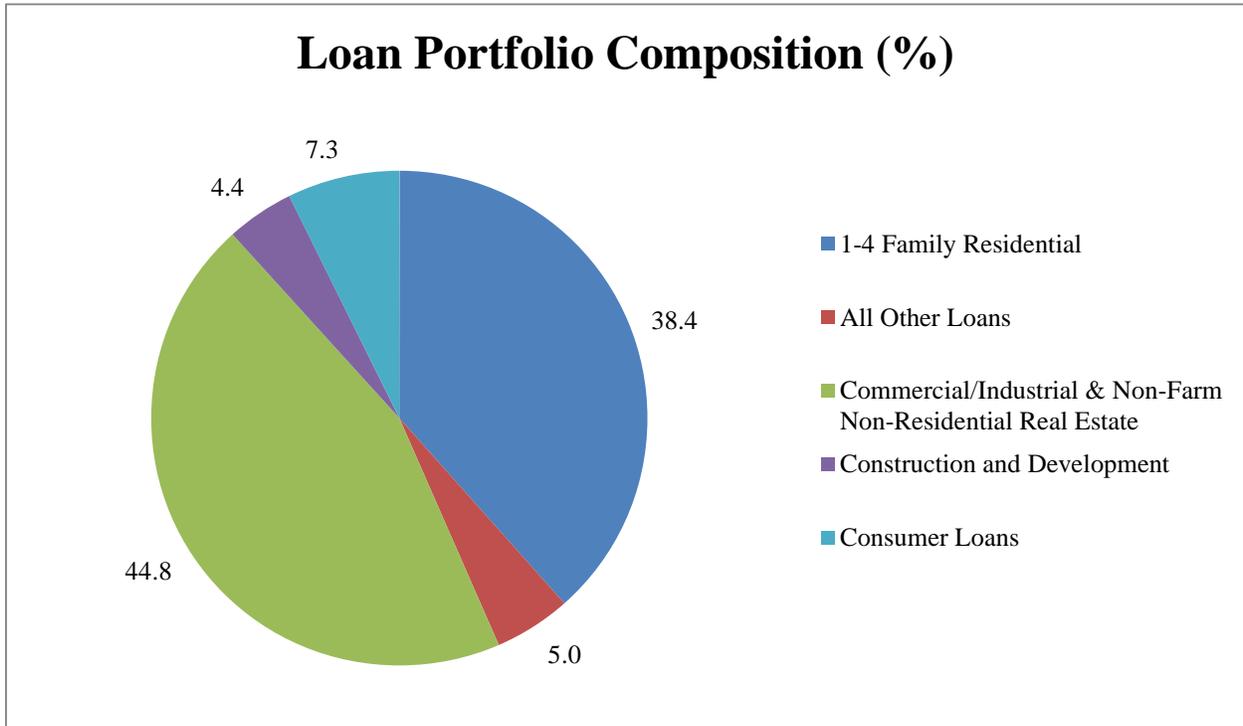
Genoa's main office is located in Genoa, Ohio in Ottawa County. The bank operates seven branch offices, one loan production office, and eight full-service ATMs throughout the assessment area. Genoa is a full-service retail bank offering deposit accounts; residential mortgages; and consumer, commercial, and agricultural loans. Since the previous evaluation, Genoa has opened a branch in Sylvania, Ohio and a branch in Port Clinton, Ohio.

The following table and charts illustrate the volume and distribution of loans originated within Genoa's assessment area during the evaluation period.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2016		12/31/2015		12/31/2014	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	10,121	4.4%	6,755	3.1%	7,842	3.9%
Secured by One- to Four- Family Dwellin	88,037	38.4%	82,571	37.9%	77,034	38.6%
Other Real Estate: Farmland	9,215	4.0%	8,631	4.0%	7,705	3.9%
Other Real Estate: Multifamily	1,236	0.5%	1,075	0.5%	0	0.0%
Other Real Estate: Nonfarm nonresidenti	91,216	39.8%	87,118	40.0%	78,573	39.4%
Commercial and Industrial	11,444	5.0%	12,559	5.8%	11,620	5.8%
Loans to Individuals	16,666	7.3%	17,767	8.2%	15,332	7.7%
Agricultural Loans	1,178	0.5%	1,428	0.7%	1,423	0.7%
<i>Total</i>	<i>\$229,113</i>	<i>100.00%</i>	<i>\$217,904</i>	<i>100.00%</i>	<i>\$199,529</i>	<i>100.00%</i>

* 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.

As of December 31, 2016, Genoa's net loans and leases represent 72.3% of total assets.



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

DESCRIPTION OF ASSESSMENT AREAS

Genoa had delineated one assessment area for the previous CRA examination. Changes to the assessment area since the previous examination include taking the entirety of Lucas County in 2013 and opening the Sylvania Branch (Lucas County) in September 2014. MSA changes in 2014 removed Ottawa County from the Toledo MSA, thereby creating two assessment areas. Genoa took the entirety of Wood County effective the beginning of 2016.

Genoa has two assessment areas within Ohio for CRA purposes: the Toledo MSA comprises the entirety of Lucas and Wood counties and Non-metropolitan Ohio comprises the entirety of Ottawa County and the northwest census tract 9610.00 in Sandusky County.

Genoa's assessment area consists of 170 census tracts. Specifically, the total assessment area contains 27 low-, 30 moderate-, 67 middle-, 44 upper- and two unknown-income census tracts. None of the middle-income tracts are designated as distressed or underserved. Genoa operates seven branches and one loan production office. The main office, two additional branches, and loan production office are located in Non-metropolitan Ohio. Of these, the main office, loan production office and one branch are located in upper-income census tracts and the third branch is located in a middle-income census tract. Genoa has four branches located in the Toledo MSA. Two branches are located in middle-income census tracts and two branches are located in upper-income census tracts.

Community Contacts

Two community contact interviews were conducted to provide additional information regarding credit needs of the local community and context to the demographic and economic conditions of the Toledo MSA.

One interview was with an economic development organization in Bowling Green, Ohio that promotes economic development in Wood County. According to the contact, Wood County has a need for affordable housing and short-term farm loans. The contact stated that local banks are actively involved in the community; however, there are opportunities for financial institutions in the area to meet affordable housing and short term farm loan needs.

A second community contact was with an affordable housing organization in Toledo, Ohio that provides affordable housing to consumers who cannot obtain conventional financing. According to the contact, obtaining affordable housing is a problem in Lucas County. Due to the need for affordable housing in the area, there are opportunities for financial institutions to meet this need.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Genoa’s performance under the lending test is considered “Satisfactory.” The loan-to-deposit ratio is reasonable. Although Genoa made a majority of its loans inside its assessment area, the geographic distribution of lending is poor; however, the borrower distribution of lending is considered reasonable.

Loan-to-Deposit Ratio

A financial institution’s loan-to-deposit (LTD) ratio compares the institution’s aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution’s lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing the total by the number of quarters. The following table shows Genoa’s quarterly LTD ratios for 16 quarters since the previous evaluation, along with the average LTD ratios for the same period.

Genoa Banking Company Loan-to-Deposit Ratios					
AS OF DATE	GENOA BKG CO	OLD FT BKG CO	SIGNATURE BK NA	WATERFORD BK NA	CUSTOM PEER
December 31, 2016	85.51	66.64	92.19	82.71	80.51
September 30, 2016	86.05	64.41	89.84	79.70	77.98
June 30, 2016	86.33	64.55	92.45	90.03	82.34
March 31, 2016	83.30	64.24	91.20	95.72	83.72
December 31, 2015	89.01	68.23	97.39	94.33	86.65
September 30, 2015	85.38	64.36	90.14	79.99	78.16
June 30, 2015	85.92	65.90	91.83	83.27	80.33
March 31, 2015	83.20	65.39	92.25	92.51	83.38
December 31, 2014	81.66	68.25	92.85	90.75	83.95
September 30, 2014	80.96	66.96	90.82	83.45	80.41
June 30, 2014	83.42	68.18	87.55	85.44	80.39
March 31, 2014	83.24	67.31	88.82	81.05	79.06
December 31, 2013	88.37	67.88	87.13	81.84	78.95
September 30, 2013	87.40	65.13	92.93	76.27	78.11
June 30, 2013	85.98	65.01	95.58	78.79	79.79
March 31, 2013	84.80	63.84	93.89	80.41	79.38
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation	85.03	66.02	91.68	84.77	80.82

Genoa’s average LTD ratio was 85.03% over the past sixteen quarters. Genoa’s LTD ratio was compared to three local peer banks: Old Fort Banking Company in Old Fort, Ohio; Signature Bank, National Association in Toledo, Ohio; and Waterford Bank, NA in Toledo, Ohio. Genoa’s LTD ratio is higher than the custom peer average. Considering the bank’s lending-related activity, size, financial condition, and assessment area credit needs, Genoa’s LTD ratio is considered reasonable.

Lending in the Assessment Area

Genoa's HMDA, consumer, and small business loans were analyzed to determine the volume of lending inside and outside its assessment area. The following table shows the distribution of loans made inside and outside its assessment area.

Lending Inside and Outside the Assessment Area

Exam: Genoa 2017

Loan Type - Description	Inside				Outside				Total			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
HE - Home Equity	160	95.8	7,975	94.6	7	4.2	455	5.4	167	100.0	8,430	100.0
MV - Motor Vehicle	552	84.5	8,618	83.6	101	15.5	1,685	16.4	653	100.0	10,302	100.0
OU - Other - Unsecured	230	92.4	2,462	92.2	19	7.6	207	7.8	249	100.0	2,669	100.0
Total Consumer related	942	88.1	19,055	89.0	127	11.9	2,347	11.0	1,069	100.0	21,401	100.0
CV - Home Purchase - Conventional	389	87.8	59,715	86.0	54	12.2	9,707	14.0	443	100.0	69,422	100.0
HI - Home Improvement	96	97.0	3,755	99.2	3	3.0	29	0.8	99	100.0	3,784	100.0
MF - Multi-Family Housing	18	90.0	7,150	95.8	2	10.0	313	4.2	20	100.0	7,463	100.0
RF - Refinancing	243	90.3	34,978	89.5	26	9.7	4,092	10.5	269	100.0	39,070	100.0
Total HMDA related	746	89.8	105,598	88.2	85	10.2	14,141	11.8	831	100.0	119,739	100.0
SB - Small Business	233	91.4	56,194	86.8	22	8.6	8,517	13.2	255	100.0	64,711	100.0
Total Small Bus. related	233	91.4	56,194	86.8	22	8.6	8,517	13.2	255	100.0	64,711	100.0
TOTAL LOANS	1,921	89.1	180,847	87.9	234	10.9	25,004	12.1	2,155	100.0	205,851	100.0

As the table indicates, a majority (89.1% by volume and 87.9% by dollar amount) of Genoa's loans were made inside its delineated assessment area.

Geographic Distribution of Lending

Genoa's geographic distribution of lending is poor. Significant lending gaps in the Toledo MSA area were present. HMDA lending, which received the most weight, is considered poor. Consumer lending is also considered poor and small business lending is considered reasonable. The respective analyses are included within each assessment area evaluation further in this report.

Borrower Distribution of Lending

Genoa's lending to borrowers of different income categories and lending to businesses of different revenue sizes is considered reasonable. HMDA lending, which received the most weight, is considered reasonable. Consumer and small business lending are also considered reasonable. The respective analyses are included within each assessment area evaluation later in this report.

Response to Consumer Complaints

No CRA-related complaints were filed against Genoa during the evaluation period.

Fair Lending or Other Illegal Credit Practices Review

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

**DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE
TOLEDO METROPOLITAN STATISTICAL AREA 45780
(Full-scope Review)**

The Toledo MSA assessment area consists of the entirety of Lucas and Wood counties. This assessment area consists of a total of 156 census tracts comprised of 27 low- (17.5%), 30 moderate- (19.5%), 61 middle- (39.6%), 36 upper- (23.4%), and two unknown-income tracts. Genoa has three branches in Lucas County and one branch in Wood County.

Lucas County is directly west of Lake Erie and has the largest population of all counties in the assessment areas, with Toledo as the county seat. According to the 2010 U.S. Census Bureau Report, the population in Lucas County was 441,815. The majority of Lucas County is urban, with cropland as the second-largest use of land, which could impact the level of lending in the assessment area. Competition is high, as several major regional banks operate in this area.

Wood County is directly south of Lucas County with Bowling Green as the county seat. According to the 2010 U.S. Census Bureau Report, the population in Lucas County was 125,488. The majority of Wood County is cropland, with urban area as the second-largest use of land, which could impact the level of lending in the assessment area.

As of June 30, 2016, the Federal Deposit Insurance Corporation (FDIC) reported 20 insured financial institutions operating within the assessment area. The FDIC’s market share report indicates that Genoa is ranked ninth, holding 1.4% of the market share of deposits.¹ The following table illustrates the deposit market share for the top ten financial institutions in the counties.

#	Financial Institution	Deposit Market Share
1	Fifth Third Bank	25.4%
2	The Huntington National Bank	25.1%
3	KeyBank National Association	10.1%
4	PNC Bank, National Association	9.3%
5	Signature Bank, National Association	7.4%
6	Citizens Bank, National Association	7.2%
7	Waterford Bank, N.A.	5.4%
8	First Federal Bank of the Midwest	2.8%
9	The Genoa Banking Company	1.4%
10	The State Bank and Trust Company	1.3%

The largest institution by deposit share is Fifth Third Bank, followed by The Huntington National Bank and KeyBank National Association.

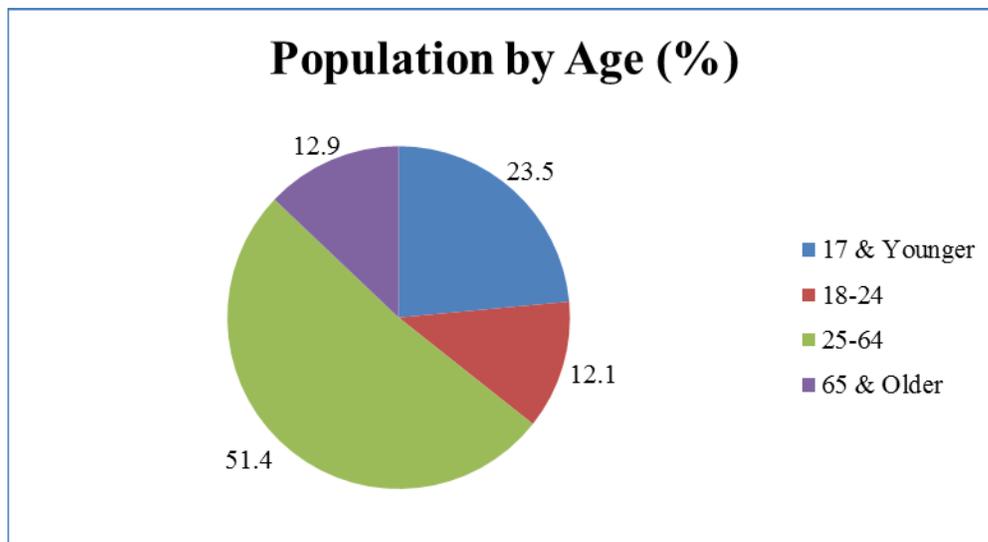
¹ <http://www2.fdic.gov/sod/sodMarketBank.asp>

Population Characteristics

According to the 2010 U.S. Census Bureau Report, the total population in the assessment area was 567,303. 10.2% of the population resides in low-, 18.0% reside in moderate-, 41.6% reside in middle-, and 30.2% reside in upper-income census tracts.

County	2010 Population	2015 Population	Population Percent Change
Lucas	441,815	433,689	-1.8%
Wood	125,488	129,730	3.4%
Total	567,303	563,419	

As shown in the chart below, 76.5% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 63.6% of the population is between the ages of 18 and 64 and more likely to have credit needs.



Income Characteristics

According to data from the U.S. Census, the median family income level for the assessment area was \$58,134, which is below Ohio’s median family income of \$59,680. Based on 2016 HUD data, the median family income increased to \$61,000. The 2015 and 2016 estimated median family income levels are detailed in the following table.²

² <http://www.huduser.org/portal/datasets/il/il13/index.html>

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

HUD Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2015	\$61,700	0 - \$30,849	\$30,850 - \$49,359	\$49,360 - \$74,039	\$74,040 - & above
2016	\$61,000	0 - \$30,499	\$30,500 - \$48,799	\$48,800 - \$73,199	\$73,200 - & above

The assessment area contains 227,636 households, of which 141,782 (62.3%) are designated as families. Low- and moderate-income families represent 22.3% 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 data from the U.S. Census Bureau’s Small Area Income and Poverty Estimates (SAIPE), household poverty rates for Lucas and Wood Counties were as follows: ³

County	2014 Poverty Rate	2015 Poverty Rate	Change
Lucas	20.7%	19.5%	-5.8%
Wood	13.5%	11.7%	-13.3%
Ohio	15.8%	14.8%	-6.3%
United States	15.5%	14.7%	-5.2%

Approximately 19.5% of Lucas County’s population was below the poverty level during 2015. 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 Lucas County is higher than Wood County, state, and national rates.

Labor, Employment and Economic Characteristics

The following table illustrates the land use for each county in the assessment area:⁴

County	Urban	Cropland	Pasture	Forest	Open Water	Bare Mines	Wetlands
Lucas	45.7%	31.3%	4.4%	11.7%	2.6%	0.6%	3.7%
Wood	14.5%	78.7%	1.6%	3.8%	0.7%	0.3%	0.4%

Only 45.7% of the land in Lucas County and 14.5% of the land in Wood County is considered urban, which includes land used for residential, commercial, industrial, or transportation purposes or as urban grasses. The remaining amount of land that does not contain housing, businesses, and schools may impact Genoa’s ability to originate all types of loans in this assessment area.

³ <https://www.census.gov/did/www/saipe/>

⁴ http://www.development.ohio.gov/reports/reports_countytrends_map.htm

The following table shows primary employment sectors and major employers for each of the counties in the assessment area.⁵

County	Primary Employment Sectors	Major Employers
Lucas	Trade, Transportation and Utilities; Professional and Business Services; Education and Health Services; Leisure and Hospitality; Financial Services	Andersons Inc, BP, Carlyle Group/HCR ManorCare, Fiat Chrysler Automobiles US, 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 Service Inc, University of Toledo
Wood	Trade, Transportation and Utilities; Professional and Business Services; Leisure and Hospitality; Financial Services; 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, WPP PLC/TNS Custom Research

The following table shows the 2015 and 2016 average annual unemployment rate for counties in the assessment area and Ohio.

**Unemployment Rates
Genoa Bank: Toledo, OH - MSA**

Area	Years - Annualized	
	2015	2016
Lucas Co.	5.0	4.9 (P)
Wood Co.	4.1	3.9 (P)
Toledo, OH MSA	4.8	4.7 (P)
Ohio	4.7 (D)	4.8 (D)
National	4.8	4.5

Not Seasonally Adjusted, Data Extracted on March 13, 2017

D: Reflects revised population controls and model reestimation

P: Preliminary

The unemployment rate for Lucas County was higher than Ohio for both years. Both Lucas and Wood counties experienced declines in the rate between the two years, in addition to Ohio.

Housing Characteristics

There were 255,574 housing units in the assessment area based on the 2010 U.S. Census. Within the assessment area, 58.7% of the units were owner-occupied, 30.4% were rental units, and 10.9% were vacant. The owner-occupancy rate is lower in comparison to the Ohio rate, where 61.7% of the units were owner-occupied. Additionally, 82.8% are one-to-four family units, 3.7% are mobile homes, and 17.2% are multi-family homes.

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

Of these housing types, 25.6% are located in low-, 15.9% are located in moderate-, 16.6% are located in middle-, and 41.9% are located in upper-income census tracts. These numbers indicate that most of the demand for home mortgage lending would be in upper-income tracts.

According to the 2010 U.S. Census Data, the median age of the housing stock in the assessment area was 50 years, with 34.0% 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-income tracts and 57 years in moderate-income tracts; therefore, it appears there could be a need for home improvement and rehabilitation loans in these lower-income areas.

The median housing value in the assessment area is \$129,420, with an affordability ratio of 34.3%. The higher the affordability ratio, the more affordable a home is considered. The housing affordability ratio is calculated by dividing the median household income by the median housing value. Furthermore, based on the 2016 median family income for the Toledo MSA (\$61,000), approximately 40.1% of the homes valued up to \$111,800 in the assessment area would be considered affordable for low-income individuals and 71.6% of the homes valued up to \$178,880 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, 30-year loan.

According to RealtyTrac⁶, one in every 846 properties in Lucas County was in foreclosure in March 2017. This was higher than Ohio's ratio of one in every 1,153 properties. One in every 2,968 properties in Wood County was in foreclosure in March 2017, lower than the Ohio ratio.

Geography Name	Ratio of Properties Receiving Foreclosure Filings in March 2017
Lucas	1:846
Wood	1:2,968
Ohio	1:1,153
United States	1:1,588

According to Sperling's Best Places,⁷ the median cost of a home in Lucas County was \$84,700, which represents a depreciation of 23.5% since the prior year. Compared to the rest of the country, Lucas County's cost of living is 18.5% lower than the national average. In Wood County, the median home cost is \$127,600, depreciating 12.9% since the previous year. Compared to the rest of the country, Wood County's cost of living is 11.1% lower than the national average.

The median gross rent in the assessment area was \$637, with 10.8% of the rents under \$350 a month, according to the 2010 U.S. Census. The median gross rent in the county was lower than Ohio's at \$678. The following table further illustrates the demographics of Genoa's assessment area.

⁶ www.realtytrac.com

⁷ <http://bestplaces.net>

Combined Demographics Report

Assessment Area(s): Toledo MSA 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	27	17.3	13,612	9.6	5,839	42.9	31,626	22.3
Moderate-income	30	19.2	22,795	16.1	4,869	21.4	23,857	16.8
Middle-income	61	39.1	59,022	41.6	4,946	8.4	28,559	20.1
Upper-income	36	23.1	46,344	32.7	1,800	3.9	57,740	40.7
Unknown-income	2	1.3	9	0	9	100	0	0
Total Assessment Area	156	100.0	141,782	100.0	17,463	12.3	141,782	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	29,729	9,428	6.3	31.7	14,002	47.1	6,299	21.2
Moderate-income	50,186	20,988	14	41.8	21,748	43.3	7,450	14.8
Middle-income	106,331	66,721	44.5	62.7	29,809	28	9,801	9.2
Upper-income	69,199	52,928	35.3	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	255,574	150,065	100.0	58.7	77,571	30.4	27,938	10.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,423	6.9	1,206	6.6	211	9.2	6	3.3
Moderate-income	3,050	14.8	2,631	14.5	399	17.4	20	10.9
Middle-income	8,393	40.7	7,382	40.7	927	40.4	84	45.7
Upper-income	7,732	37.5	6,907	38.1	752	32.8	73	39.7
Unknown-income	21	0.1	17	0.1	3	0.1	1	0.5
Total Assessment Area	20,619	100.0	18,143	100.0	2,292	100.0	184	100.0
Percentage of Total Businesses:			88.0		11.1		.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.5	1	0.3	1	9.1	0	0
Moderate-income	9	2.2	7	1.8	2	18.2	0	0
Middle-income	217	52.9	212	53.1	5	45.5	0	0
Upper-income	182	44.4	179	44.9	3	27.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	410	100.0	399	100.0	11	100.0	0	.0
Percentage of Total Farms:			97.3		2.7		.0	

2016 FFIEC Census Data and 2016 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TOLEDO METROPOLITAN STATISTICAL AREA 45780

Lending performance in the Toledo MSA is considered to be reasonable.

Both the geographic and borrower distribution of lending received equal weighting. The geographic distribution is considered poor, whereas the borrower distribution of lending is considered reasonable.

The greatest consideration, based on number and volume, was given to HMDA lending (home purchase, refinance, and home improvement), followed by consumer lending (home equity, motor vehicle, and other-unsecured), and small business lending.

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

Geographic Distribution of Lending

Genoa made loans in 13 of the 27 low-income census tracts (48.1%) in the Toledo MSA and 20 of the 30 moderate-income tracts (66.7%). Genoa made loans in 57 of the 61 middle-income census tracts (93.4%) and 35 of the 36 upper-income census tracts (97.2%). Overall, Genoa made loans in 125 of the 154 census tracts (81.2%) in the assessment area. Genoa does not have any branches in low- and moderate-income tracts in the Toledo MSA.

Overall, Genoa's distribution of lending among geographies is considered poor.

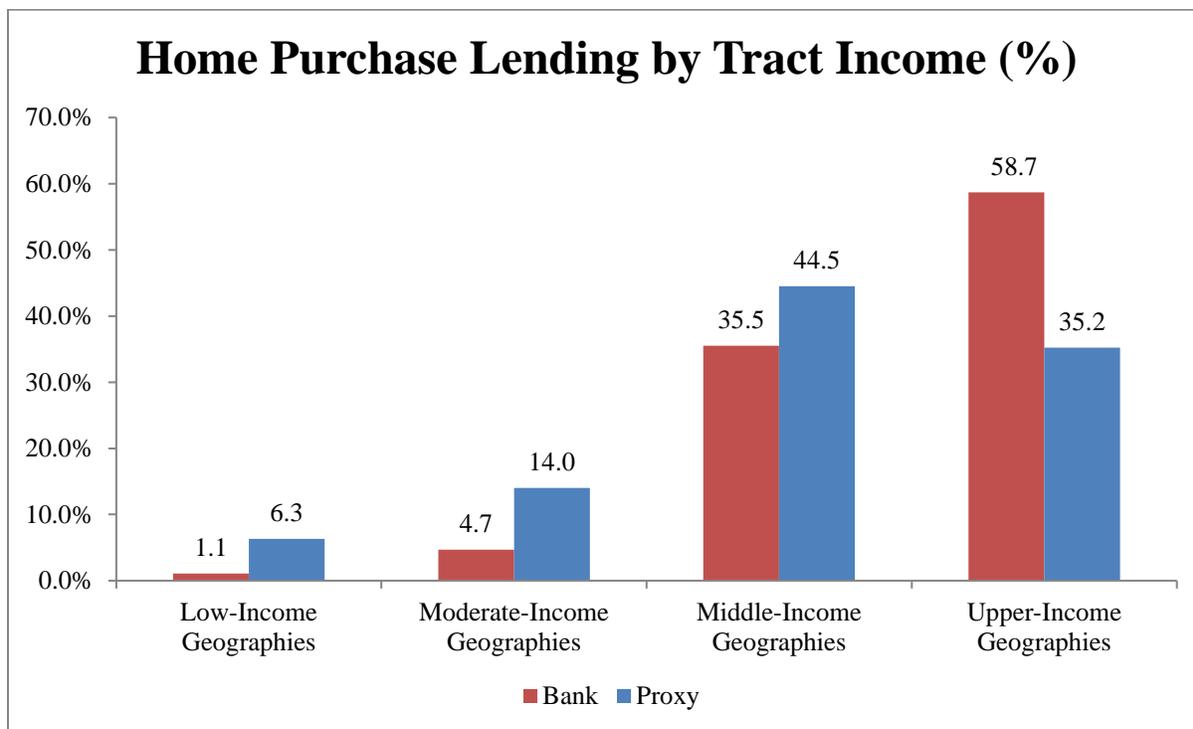
HMDA Lending

Genoa made 534 HMDA loans comprised of 276 home purchase (51.7%), 177 refinance (33.1%), and 64 home improvement (12.0%) loans. Genoa'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. Gaps in the low- and moderate-income tracts are not considered as significant given the high percentage of families below the poverty level in low- (33.4%) and moderate-income (27.9%) tracts, as well as the low percentage of owner-occupied units in low- (31.7%) and moderate-income (41.8%) tracts.

Home Purchase

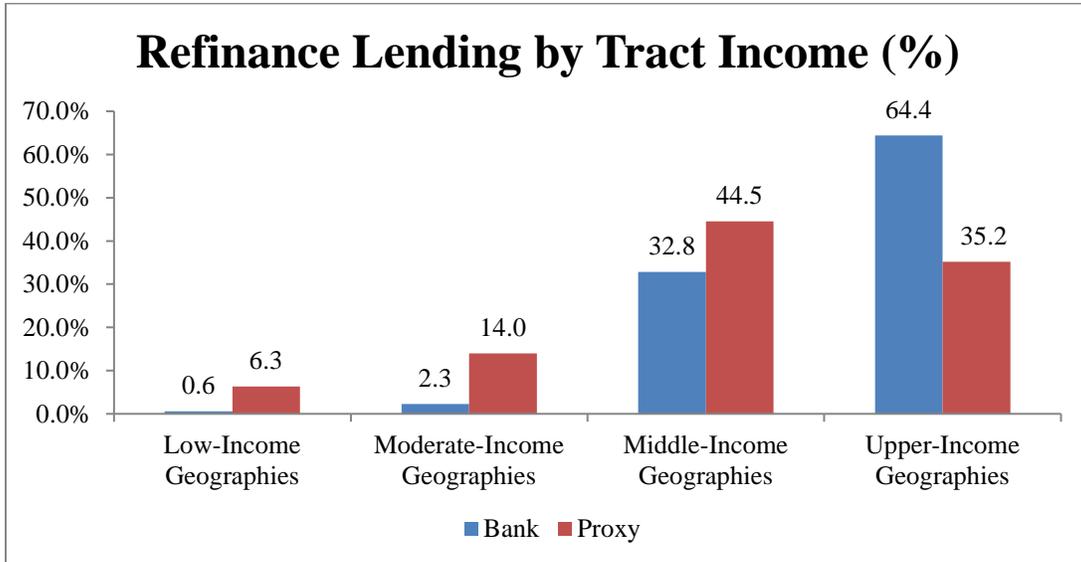
As shown in the graph below, although Genoa performed significantly below proxy in low-income tracts, it should be noted that peer performed at the same level as Genoa for 2015. Genoa performed well below proxy in moderate-income tracts, but was below peer for 2015 in this area. Genoa performed slightly below proxy in middle-income tracts and well above proxy in upper-income tracts.

Economic conditions previously discussed, including a low percentage of families residing in low- and moderate-income tracts (9.6% and 16.1%, respectively) compared to the percentage of owner-occupied properties in these areas (31.7% and 41.8%, respectively), a high percentage of families below poverty in low- and moderate-income tracts (33.4% and 27.9%, respectively), high percentages of rental and vacant units in low- and moderate-income tracts (68.3% and 58.2%, respectively), and low affordability (34.3%) in the assessment area may make it difficult to originate home purchase loans. Genoa’s geographic distribution for home purchase is considered reasonable.



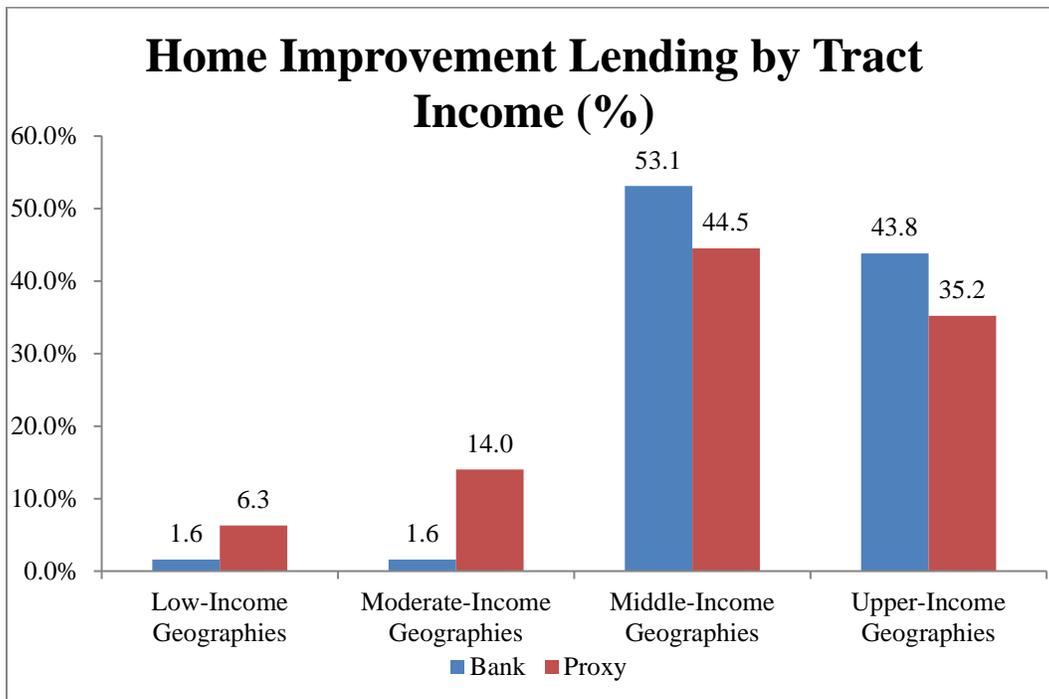
Refinance

As depicted in the following graph, Genoa performed significantly below proxy in low- and moderate-income tracts, slightly below proxy in middle-income tracts, and well above proxy in upper-income tracts. Compared to peer, Genoa was slightly below peer in low-income tracts and significantly below peer in moderate-income tracts, as no loans were originated in 2015. Genoa’s geographic distribution for refinance is considered poor.



Home Improvement

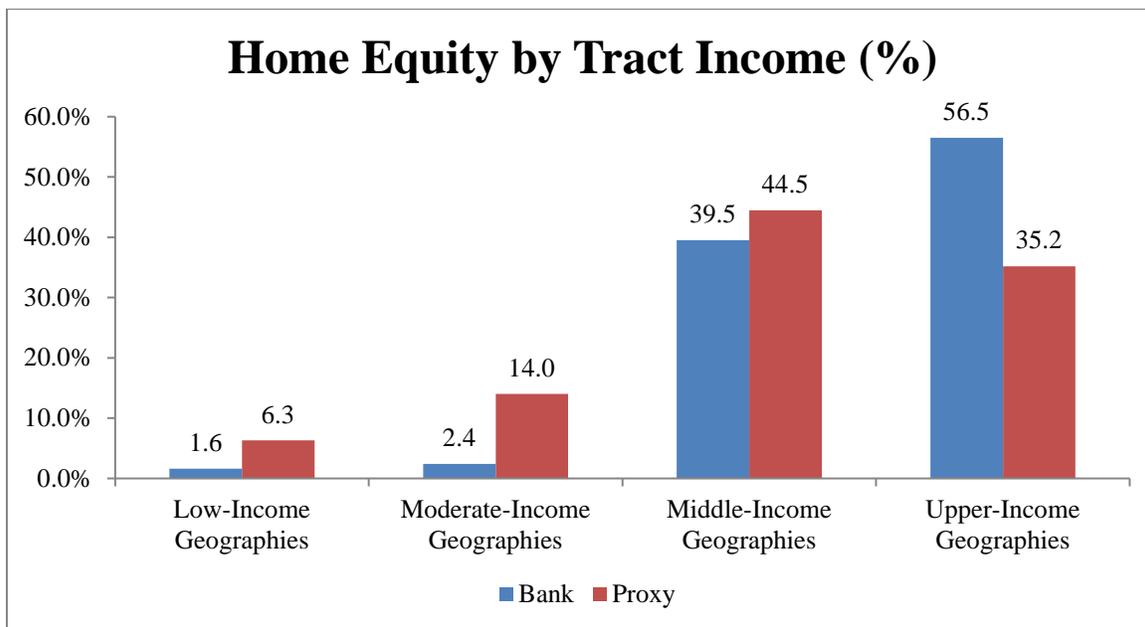
As shown in the graph below, Genoa performed well below proxy in low-income tracts, significantly below proxy in moderate-income tracts, and slightly above proxy in middle- and upper-income tracts. Compared to peer, the bank was below peer in low-income tracts and was well below in moderate-income tracts for 2015. Genoa’s geographic distribution for home improvement is considered poor.



Consumer Lending

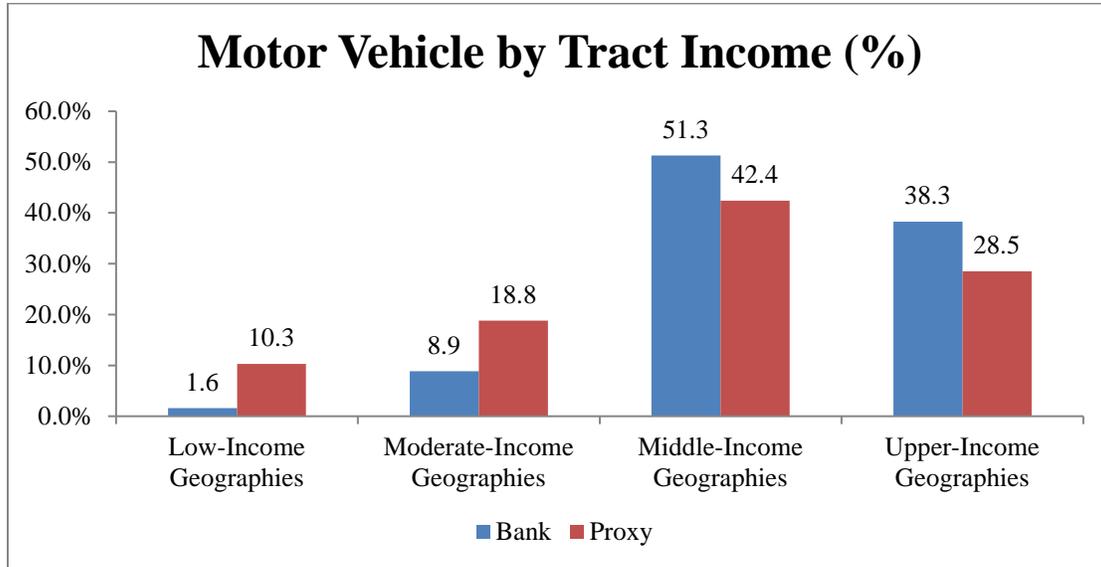
Home Equity Lines of Credit

Genoa originated 124 HELOCs within the assessment area during the review period. Genoa’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy). As shown in the graph below, Genoa performed well below proxy in low-income tracts, significantly below proxy in moderate-income tracts, slightly below proxy in middle-income tracts, and well above proxy in upper-income tracts. Genoa’s geographic distribution of home equity lending is considered poor.



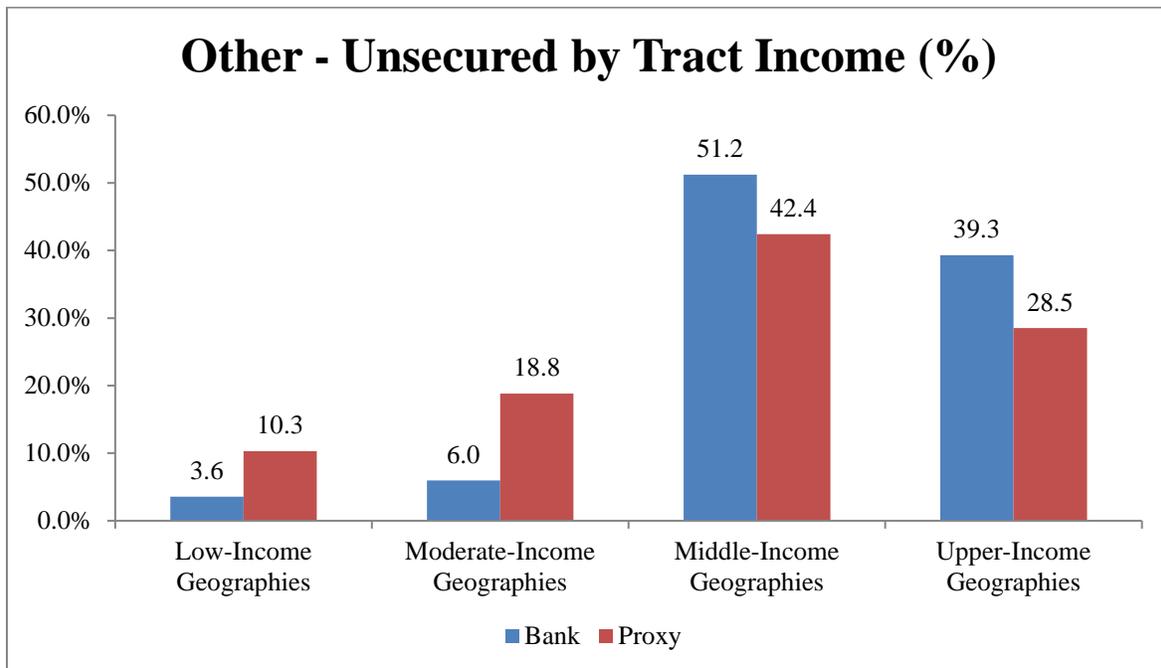
Motor Vehicle

Genoa originated 384 motor vehicle loans within the assessment area during the review period. Genoa’s performance was compared to the number of households in the assessment area (proxy). As shown in the graph below, Genoa performed significantly below proxy in low-income tracts, well below proxy in moderate-income tracts, and slightly above proxy in middle- and upper-income tracts. Consideration was given to high levels of poverty, as 27.8% of households below poverty live in low-income tracts, while 30.5% live in moderate-income tracts and 31.8% in middle-income tracts. Genoa’s geographic distribution of motor vehicle lending is considered reasonable.



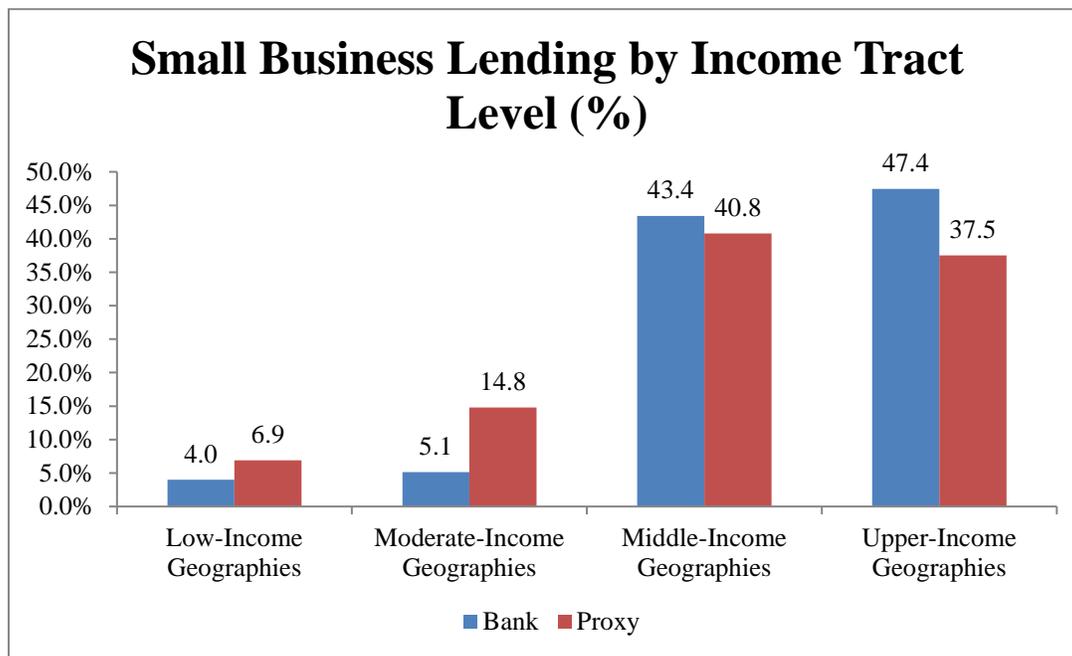
Other-Unsecured

Genoa originated 168 other-unsecured loans within the assessment area during the review period. Genoa’s performance was compared to the number of households in the assessment area (proxy). As shown in the graph below, Genoa performed well below proxy in low- and moderate-income tracts, and slightly above proxy in middle- and upper-income tracts. Genoa’s geographic distribution of other - unsecured lending is considered poor.



Small Business Lending

Genoa originated 175 small business loans within the assessment area during the review period. Genoa’s performance was compared to the number of businesses in the assessment area (proxy). As shown in the graph below, Genoa performed below proxy in low-income tracts, well below proxy in moderate-income tracts, and slightly above proxy in middle- and upper-income tracts. Genoa’s geographic distribution of small business lending is considered reasonable.



Borrower Distribution of Lending

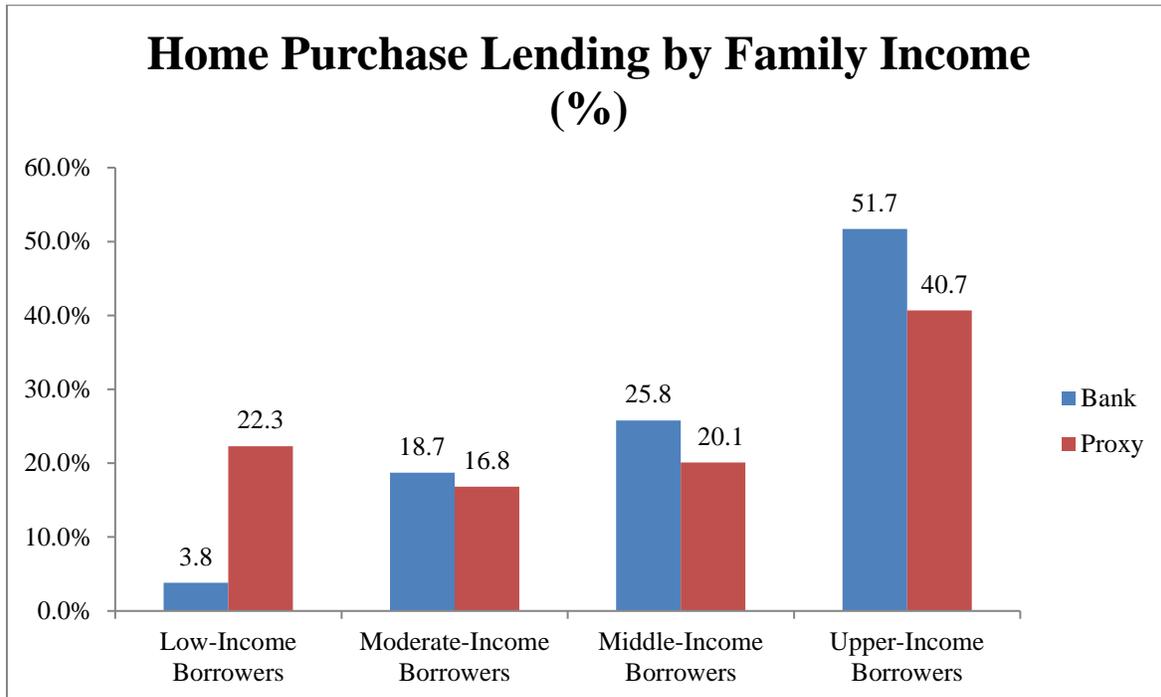
Genoa’s lending to borrowers of different income levels and lending to businesses of different revenue sizes is considered reasonable. Genoa’s performance was compared to the income levels of families in the assessment area (proxy). Poverty levels, lack of affordability, and general economic conditions in the assessment area, which provide limited lending opportunities, were also considered as part of the evaluation. Borrower distribution of HMDA and consumer lending is reasonable. Lending to small businesses under \$1MM in revenue is reasonable.

HMDA Lending

Home Purchase

Genoa originated a total of 276 home purchase loans, of which 10 were to low-, 50 to moderate-, 69 to middle-, and 138 to upper-income borrowers. There were nine borrowers with unknown income.

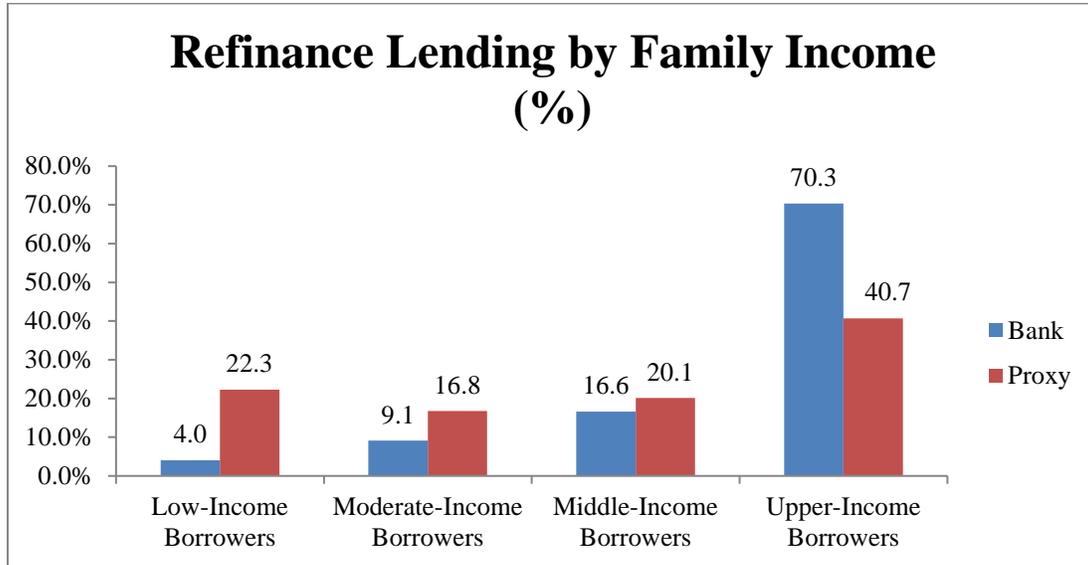
As shown in the graph below, Genoa performed significantly below proxy for lending to low-income borrowers, slightly above proxy for lending to moderate-income borrowers, above proxy for middle-income borrowers, and above proxy for upper-income borrowers. This may, in part, be attributed to economic conditions and low affordability (34.3%) in the assessment area. Genoa's borrower distribution for home purchase is considered reasonable.



Refinance

Genoa originated a total of 177 refinance loans, of which seven were to low-, 16 to moderate-, 29 to middle-, and 123 to upper-income borrowers. There were two borrowers with unknown income.

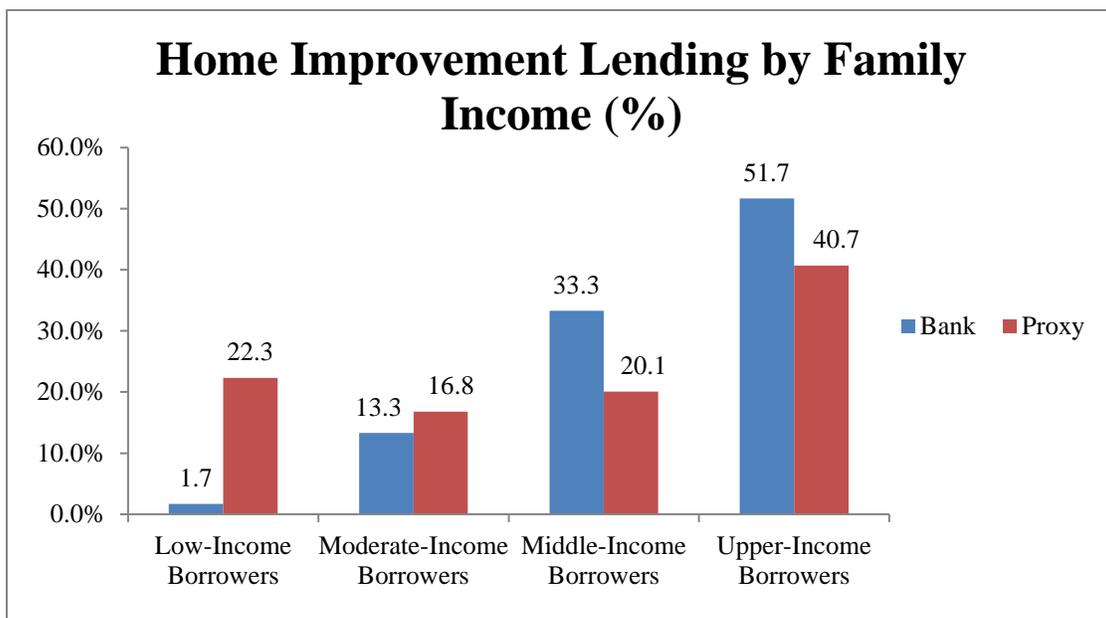
As shown in the following graph, Genoa performed significantly below proxy for lending to low-income borrowers, below proxy for lending to moderate-income borrowers, slightly below proxy for middle-income borrowers, and significantly above proxy for upper-income borrowers. Genoa's borrower distribution for refinance is considered reasonable.



Home Improvement

Genoa originated a total of 64 home improvement loans, of which one was to low-, eight to moderate-, 20 to middle-, and 31 to upper-income borrowers. There were four borrowers with unknown income.

As shown in the graph below, Genoa performed significantly below proxy for lending to low-income borrowers, slightly below proxy for lending to moderate-income borrowers, well above proxy for middle-income borrowers, and above proxy for upper-income borrowers. Genoa’s borrower distribution for home improvement is considered reasonable.

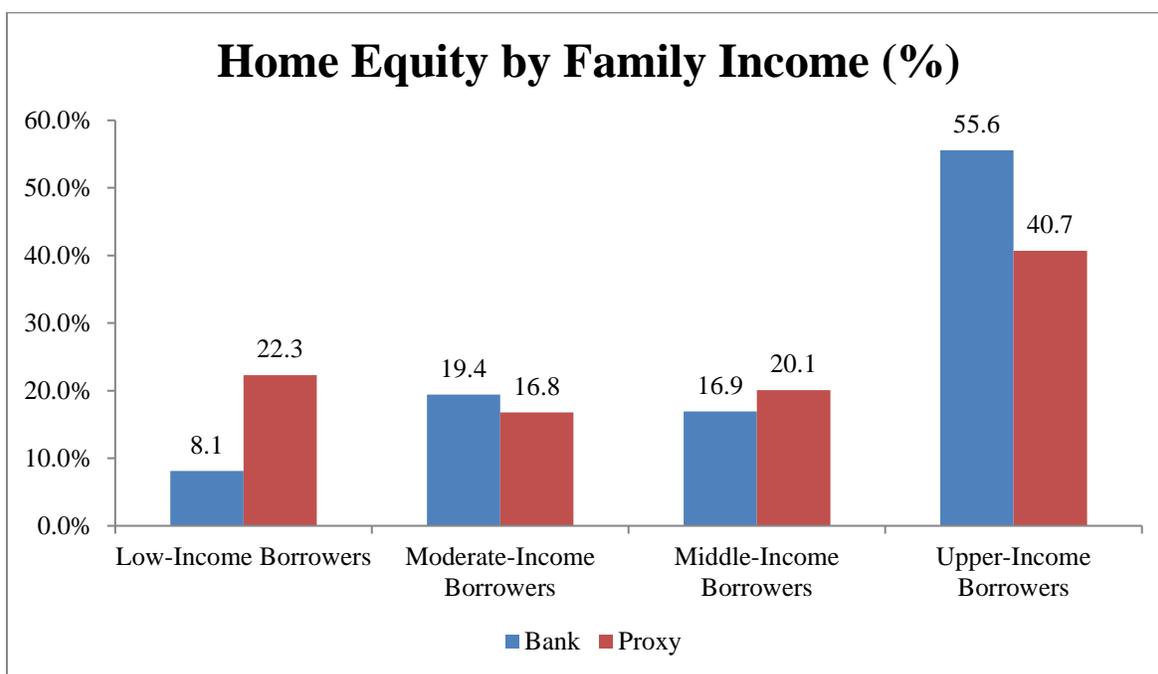


Consumer Lending

Home Equity Lines of Credit

Genoa originated a total of 124 home equity lines of credit, of which 10 were to low-, 24 to moderate-, 21 to middle-, and 69 to upper-income borrowers. There were no borrowers with unknown income.

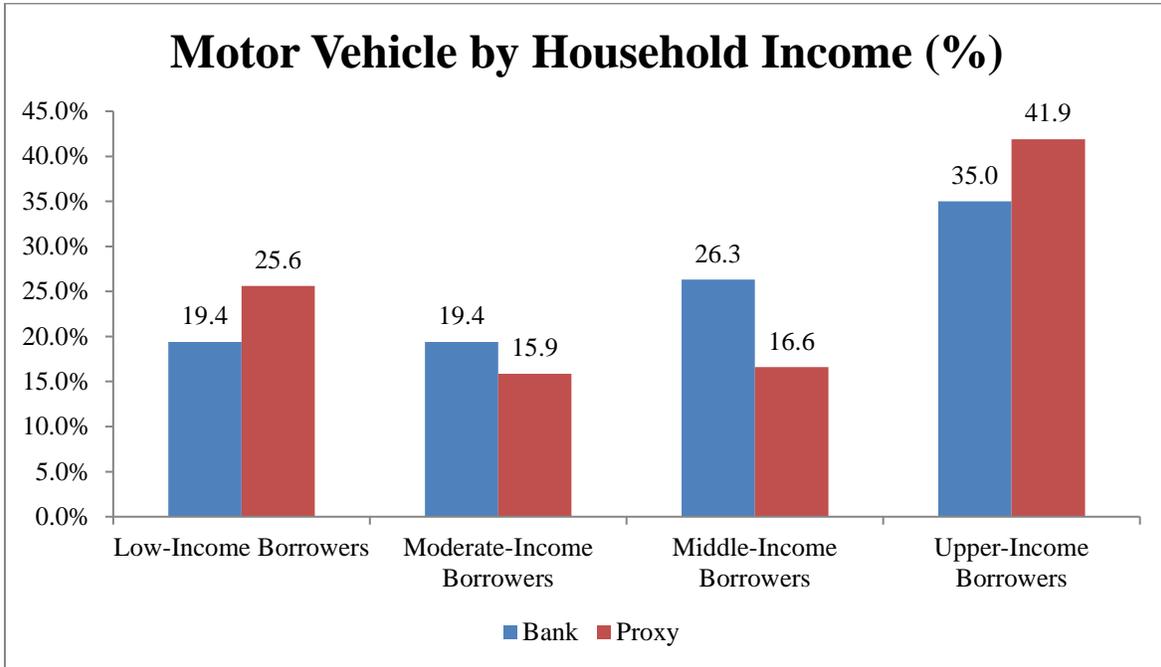
As shown in the graph below, Genoa performed well below proxy for lending to low-income borrowers, slightly above proxy for lending to moderate-income borrowers, slightly below proxy for middle-income borrowers, and above proxy for upper-income borrowers. Genoa's borrower distribution for home equity lines of credit is considered reasonable.



Motor Vehicle

Genoa originated a total of 384 motor vehicle loans, of which 73 were to low-, 73 to moderate-, 99 to middle-, and 132 to upper-income borrowers. There were seven borrowers with unknown income.

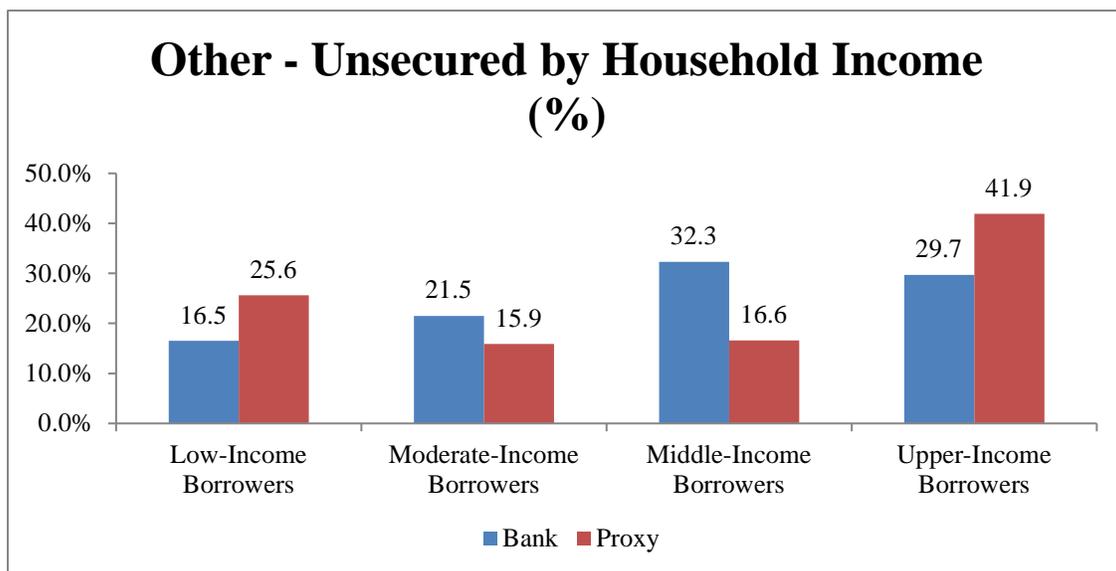
As shown in the graph below, Genoa performed slightly below proxy for lending to low-income borrowers, slightly above proxy for lending to moderate-income borrowers, well above proxy for middle-income borrowers, and slightly below proxy for upper-income borrowers. Genoa's borrower distribution for motor vehicle is considered reasonable.



Other-Unsecured

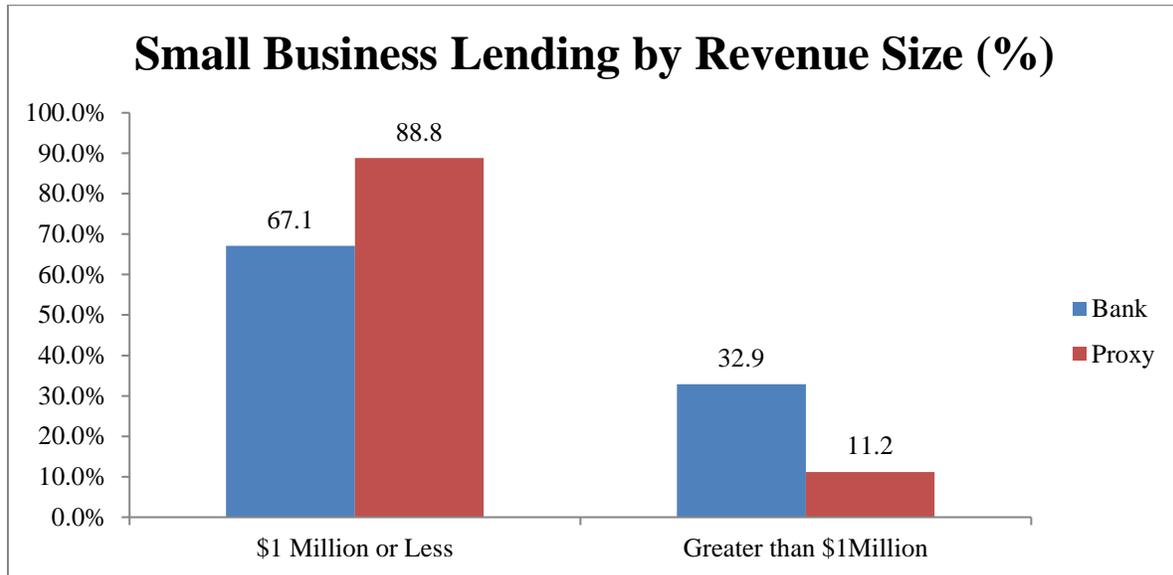
Genoa originated a total of 168 other-unsecured loans, of which 26 were to low-, 34 to moderate-, 51 to middle-, and 47 to upper-income borrowers. There were 10 borrowers with unknown income.

As shown in the graph below, Genoa performed below proxy for lending to low-income borrowers, above proxy for lending to moderate-income borrowers, significantly above proxy for middle-income borrowers, and below proxy for upper-income borrowers. Genoa’s borrower distribution for other - unsecured is considered reasonable.



Small Business Lending

As depicted in the graph below, Genoa's lending to businesses with revenue of \$1 million or less (67.1%) is slightly below the percentage of such businesses in the assessment area (88.8%), which is the proxy.



Further analysis of small business lending shows 50.3% of Genoa's small business loans were for \$100,000 or less. Typically, the extent to which a bank is willing to extend loans in amounts of \$100,000 or less is reviewed because smaller businesses often have a greater need for small-dollar loans. The borrower distribution for small business lending is considered reasonable.

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

Non-metropolitan Ohio consists of the entirety of Ottawa County and the northwest census tract 9610.00 in Sandusky County. The assessment area consists of 14 census tracts, of which six are middle- (37.5%), and eight are upper-income (62.5%).

Genoa's operates the main office, two branches, and loan production office in Non-metropolitan Ohio. Ottawa County is east of Lucas County and has the largest population of all counties in Non-metropolitan Ohio, with Port Clinton as the county seat. According to the 2010 U.S. Census Bureau Report, the population in Ottawa County was 41,428. The majority of Ottawa County is cropland, with urban area as the second largest use of land, which could impact the level of lending in the assessment area. Based on Genoa's lending volume, a limited-scope review was conducted in this assessment area.

According to the June 30, 2015 Federal Deposit Insurance Corporation (FDIC) Market Share Report, Genoa had 9.1% of the deposits and is ranked third out of 15 institutions in this market. The top five financial institutions in the market are The Croghan Colonial Bank, The Huntington National Bank, The Genoa Banking Company, Fifth Third Bank, and U.S. Bank National Association.⁸

Between January 1, 2015 and June 30, 2016, Genoa originated 515 loans in 14 census tracts in Non-metropolitan Ohio. Genoa originated 212 HMDA loans, 266 consumer loans, and 37 small business loans in the assessment area during the review period.

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

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

⁸ <http://www2.fdic.gov/sod/sodMarketBank.asp>

Combined Demographics Report

Assessment Area(s): Non Metro OH 2016

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	1,766	13
Moderate-income	0	0	0	0	0	0	1,891	13.9
Middle-income	6	42.9	6,207	45.8	582	9.4	2,858	21.1
Upper-income	8	57.1	7,357	54.2	280	3.8	7,049	52
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	14	100.0	13,564	100.0	862	6.4	13,564	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	13,595	7,327	45.7	53.9	1,901	14	4,367	32.1
Upper-income	15,759	8,700	54.3	55.2	1,576	10	5,483	34.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	29,354	16,027	100.0	54.6	3,477	11.8	9,850	33.6
	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	958	49.8	863	50.1	79	52	16	32.7
Upper-income	967	50.2	861	49.9	73	48	33	67.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,925	100.0	1,724	100.0	152	100.0	49	100.0
Percentage of Total Businesses:			89.6		7.9		2.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	51	35.7	51	36.2	0	0	0	0
Upper-income	92	64.3	90	63.8	2	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	143	100.0	141	100.0	2	100.0	0	.0
Percentage of Total Farms:			98.6		1.4		.0	

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

Genoa's lending performance in this assessment area is consistent with the lending performance in the full-scope area.

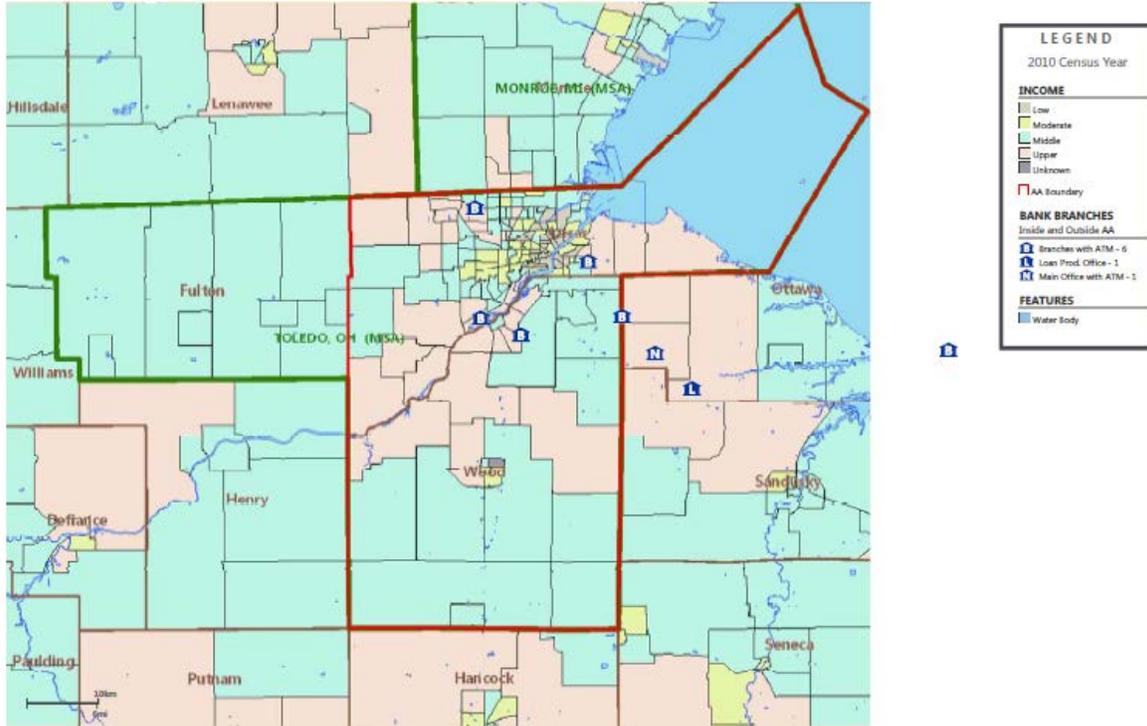
Genoa's lending performance has a reasonable distribution of loans to borrowers of different income/revenue levels. The geographic distribution of lending is also reasonable and there were no lending gaps noted within the assessment area. There are no low- or moderate-income census tracts in this assessment area.

Lending levels in Non-metropolitan Ohio are consistent with Genoa's overall lending performance.

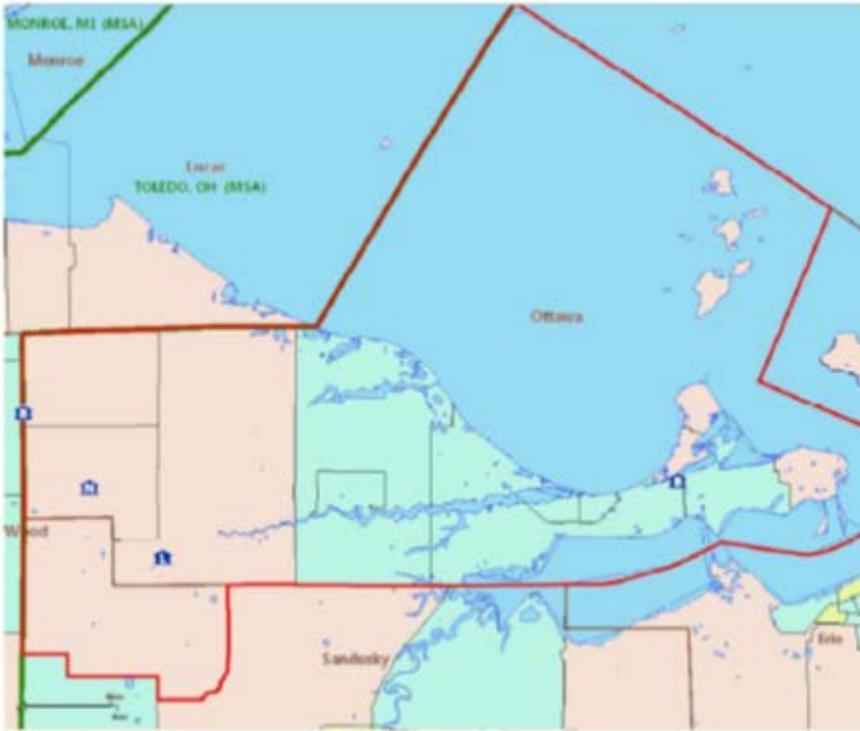
APPENDIX A

ASSESSMENT AREA MAP

Assessment Area: Toledo OH MSA



Assessment Area: Non Metro OH



APPENDIX B

LENDING TABLES

HMDA Loan Distribution Table

Exam: Genoa 2017

Assessment Area/Group : Toledo MSA

Income Categories	HMDA							
	#	By Tract Income			By Borrower Income			
	%	\$(000s)	%	#	%	\$(000s)	%	
Home Purchase								
Low	3	1.1%	439	1.1%	10	3.6%	553	1.3%
Moderate	13	4.7%	830	2.0%	50	18.1%	4,259	10.3%
Low/Moderate Total	16	5.8%	1,269	3.1%	60	21.7%	4,812	11.6%
Middle	98	35.5%	12,011	29.0%	69	25.0%	7,841	18.9%
Upper	162	58.7%	28,176	68.0%	138	50.0%	27,690	66.8%
Unknown	0	0.0%	0	0.0%	9	3.3%	1,113	2.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	276	100.0%	41,456	100.0%	276	100.0%	41,456	100.0%
Refinance								
Low	1	0.6%	106	0.4%	7	4.0%	473	1.7%
Moderate	4	2.3%	533	2.0%	16	9.0%	1,346	5.0%
Low/Moderate Total	5	2.8%	639	2.4%	23	13.0%	1,819	6.7%
Middle	58	32.8%	6,198	22.9%	29	16.4%	3,510	13.0%
Upper	114	64.4%	20,230	74.7%	123	69.5%	21,600	79.8%
Unknown	0	0.0%	0	0.0%	2	1.1%	138	0.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	177	100.0%	27,067	100.0%	177	100.0%	27,067	100.0%
Home Improvement								
Low	1	1.6%	10	0.4%	1	1.6%	9	0.4%
Moderate	1	1.6%	2	0.1%	8	12.5%	133	5.2%
Low/Moderate Total	2	3.1%	12	0.5%	9	14.1%	142	5.5%
Middle	34	53.1%	1,226	47.9%	20	31.3%	332	13.0%
Upper	28	43.8%	1,321	51.6%	31	48.4%	1,942	75.9%
Unknown	0	0.0%	0	0.0%	4	6.3%	143	5.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	64	100.0%	2,559	100.0%	64	100.0%	2,559	100.0%
Multi-Family								
Low	2	11.8%	195	2.9%	0	0.0%	0	0.0%
Moderate	4	23.5%	1,413	21.1%	0	0.0%	0	0.0%
Low/Moderate Total	6	35.3%	1,608	24.0%	0	0.0%	0	0.0%
Middle	7	41.2%	3,921	58.6%	0	0.0%	0	0.0%
Upper	4	23.5%	1,161	17.4%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	17	100.0%	6,690	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	6,690	100.0%	17	100.0%	6,690	100.0%
HMDA Totals								
Low	7	1.3%	750	1.0%	18	3.4%	1,035	1.3%
Moderate	22	4.1%	2,778	3.6%	74	13.9%	5,738	7.4%
Low/Moderate Total	29	5.4%	3,528	4.5%	92	17.2%	6,773	8.7%
Middle	197	36.9%	23,356	30.0%	118	22.1%	11,683	15.0%
Upper	308	57.7%	50,888	65.4%	292	54.7%	51,232	65.9%
Unknown	0	0.0%	0	0.0%	32	6.0%	8,084	10.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	534	100.0%	77,772	100.0%	534	100.0%	77,772	100.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: Genoa 2017

Assessment Area/Group : Non Metro OH

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	2	2.7%	103	0.9%
Moderate	0	0.0%	0	0.0%	5	6.7%	373	3.2%
Low/Moderate Total	0	0.0%	0	0.0%	7	9.3%	476	4.0%
Middle	27	36.0%	3,706	31.5%	17	22.7%	1,665	14.1%
Upper	48	64.0%	8,068	68.5%	49	65.3%	9,402	79.9%
Unknown	0	0.0%	0	0.0%	2	2.7%	231	2.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	75	100.0%	11,774	100.0%	75	100.0%	11,774	100.0%
Refinance								
Low	0	0.0%	0	0.0%	2	4.8%	124	2.4%
Moderate	0	0.0%	0	0.0%	9	21.4%	722	14.2%
Low/Moderate Total	0	0.0%	0	0.0%	11	26.2%	846	16.7%
Middle	9	21.4%	892	17.6%	6	14.3%	648	12.8%
Upper	33	78.6%	4,177	82.4%	20	47.6%	3,025	59.7%
Unknown	0	0.0%	0	0.0%	5	11.9%	550	10.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	42	100.0%	5,069	100.0%	42	100.0%	5,069	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	4.5%	3	0.3%
Moderate	0	0.0%	0	0.0%	1	4.5%	2	0.2%
Low/Moderate Total	0	0.0%	0	0.0%	2	9.1%	5	0.5%
Middle	2	9.1%	38	3.9%	6	27.3%	109	11.1%
Upper	20	90.9%	946	96.1%	12	54.5%	765	77.7%
Unknown	0	0.0%	0	0.0%	2	9.1%	105	10.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	22	100.0%	984	100.0%	22	100.0%	984	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%	460	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	460	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	460	100.0%	1	100.0%	460	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	5	3.6%	230	1.3%
Moderate	0	0.0%	0	0.0%	15	10.7%	1,097	6.0%
Low/Moderate Total	0	0.0%	0	0.0%	20	14.3%	1,327	7.3%
Middle	38	27.1%	4,636	25.4%	29	20.7%	2,422	13.2%
Upper	102	72.9%	13,651	74.6%	81	57.9%	13,192	72.1%
Unknown	0	0.0%	0	0.0%	10	7.1%	1,346	7.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	140	100.0%	18,287	100.0%	140	100.0%	18,287	100.0%

*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Genoa 2017

Assessment Area/Group: Toledo MSA

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	7	4.0%	1,565	3.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	9	5.1%	3,127	7.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	16	9.1%	4,692	11.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	76	43.4%	14,983	37.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	83	47.4%	19,991	50.4%	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	175	100.0%	39,666	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	53	30.3%	6,677	16.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	26	14.9%	6,206	15.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	96	54.9%	26,783	67.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	175	100.0%	39,666	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	88	50.3%	4,177	10.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	42	24.0%	7,185	18.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	39	22.3%	16,326	41.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	6	3.4%	11,978	30.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	175	100.0%	39,666	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	34	64.2%	1,622	24.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	11	20.8%	1,911	28.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	15.1%	3,143	47.1%	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	53	100.0%	6,677	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Genoa 2017

Assessment Area/Group: Non Metro OH

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	16	27.6%	7,013	42.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	42	72.4%	9,515	57.6%	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	58	100.0%	16,528	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	16	27.6%	1,688	10.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	11	19.0%	2,369	14.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	31	53.4%	12,471	75.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	58	100.0%	16,528	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	39	67.2%	1,349	8.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	7	12.1%	1,256	7.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	13.8%	4,175	25.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	4	6.9%	9,748	59.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	58	100.0%	16,528	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	13	81.3%	464	27.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	6.3%	105	6.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	12.5%	1,119	66.3%	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	16	100.0%	1,688	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

*Information based on 2010 ACS data

Consumer Loan Distribution Table

Exam: Genoa 2017

Assessment Area/Group : Toledo MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	2	1.6%	57	0.9%	10	8.1%	421	6.6%
Moderate	3	2.4%	160	2.5%	24	19.4%	926	14.6%
Low/Moderate Total	5	4.0%	217	3.4%	34	27.4%	1,346	21.3%
Middle	49	39.5%	1,957	30.9%	21	16.9%	985	15.6%
Upper	70	56.5%	4,161	65.7%	69	55.6%	4,004	63.2%
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	124	100.0%	6,335	100.0%	124	100.0%	6,335	100.0%
	Motor Vehicle							
Low	6	1.6%	45	0.7%	73	19.0%	719	11.9%
Moderate	34	8.9%	392	6.5%	73	19.0%	856	14.2%
Low/Moderate Total	40	10.4%	436	7.2%	146	38.0%	1,576	26.1%
Middle	197	51.3%	3,016	49.9%	99	25.8%	1,579	26.1%
Upper	147	38.3%	2,595	42.9%	132	34.4%	2,853	47.2%
Unknown	0	0.0%	0	0.0%	7	1.8%	40	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	384	100.0%	6,048	100.0%	384	100.0%	6,048	100.0%
	Other - Unsecured							
Low	6	3.6%	43	2.3%	26	15.5%	247	13.1%
Moderate	10	6.0%	81	4.3%	34	20.2%	317	16.8%
Low/Moderate Total	16	9.5%	124	6.5%	60	35.7%	564	29.9%
Middle	86	51.2%	934	49.5%	51	30.4%	535	28.3%
Upper	66	39.3%	830	44.0%	47	28.0%	742	39.3%
Unknown	0	0.0%	0	0.0%	10	6.0%	48	2.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	168	100.0%	1,888	100.0%	168	100.0%	1,888	100.0%
	Consumer Loan Totals							
Low	14	2.1%	144	1.0%	109	16.1%	1,387	9.7%
Moderate	47	7.0%	633	4.4%	131	19.4%	2,099	14.7%
Low/Moderate Total	61	9.0%	777	5.4%	240	35.5%	3,486	24.4%
Middle	332	49.1%	5,908	41.4%	171	25.3%	3,099	21.7%
Upper	283	41.9%	7,586	53.2%	248	36.7%	7,598	53.2%
Unknown	0	0.0%	0	0.0%	17	2.5%	88	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	676	100.0%	14,271	100.0%	676	100.0%	14,271	100.0%

Consumer Loan Distribution Table

Exam: Genoa 2017

Assessment Area/Group : Non Metro OH

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	2	5.6%	60	3.7%
Moderate	0	0.0%	0	0.0%	2	5.6%	100	6.1%
Low/Moderate Total	0	0.0%	0	0.0%	4	11.1%	160	9.8%
Middle	6	16.7%	219	13.3%	6	16.7%	255	15.5%
Upper	30	83.3%	1,422	86.7%	24	66.7%	1,195	72.9%
Unknown	0	0.0%	0	0.0%	2	5.6%	30	1.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	1,640	100.0%	36	100.0%	1,640	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	24	14.3%	247	9.6%
Moderate	0	0.0%	0	0.0%	24	14.3%	342	13.3%
Low/Moderate Total	0	0.0%	0	0.0%	48	28.6%	588	22.9%
Middle	26	15.5%	388	15.1%	57	33.9%	917	35.7%
Upper	142	84.5%	2,182	84.9%	50	29.8%	873	34.0%
Unknown	0	0.0%	0	0.0%	13	7.7%	191	7.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	168	100.0%	2,570	100.0%	168	100.0%	2,570	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	9	14.5%	38	6.6%
Moderate	0	0.0%	0	0.0%	17	27.4%	99	17.2%
Low/Moderate Total	0	0.0%	0	0.0%	26	41.9%	137	23.8%
Middle	7	11.3%	80	13.9%	14	22.6%	130	22.6%
Upper	55	88.7%	494	86.1%	20	32.3%	284	49.5%
Unknown	0	0.0%	0	0.0%	2	3.2%	24	4.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	62	100.0%	574	100.0%	62	100.0%	574	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	35	13.2%	345	7.2%
Moderate	0	0.0%	0	0.0%	43	16.2%	540	11.3%
Low/Moderate Total	0	0.0%	0	0.0%	78	29.3%	885	18.5%
Middle	39	14.7%	686	14.3%	77	28.9%	1,302	27.2%
Upper	227	85.3%	4,098	85.7%	94	35.3%	2,352	49.2%
Unknown	0	0.0%	0	0.0%	17	6.4%	245	5.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	266	100.0%	4,784	100.0%	266	100.0%	4,784	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Genoa 2017
Toledo MSA 2015

Selected Year: 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	109	1.52%	10,240	1.04%	595	8.27%	39,616	4.04%
Moderate	577	8.02%	40,810	4.16%	1,601	22.26%	148,943	15.19%
<i>Low/Moderate Total</i>	<i>686</i>	<i>9.54%</i>	<i>51,050</i>	<i>5.21%</i>	<i>2,196</i>	<i>30.53%</i>	<i>188,559</i>	<i>19.23%</i>
Middle	3,113	43.28%	324,916	33.13%	1,679	23.35%	204,728	20.87%
Upper	3,393	47.18%	604,771	61.66%	2,391	33.25%	474,744	48.41%
Unknown	0	0.0%	0	0.0%	926	12.88%	112,706	11.49%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7,192	100.0%	980,737	100.0%	7,192	100.0%	980,737	100.0%
	Refinance							
Low	77	1.68%	4,284	0.72%	277	6.06%	19,606	3.31%
Moderate	358	7.83%	28,143	4.76%	710	15.53%	58,706	9.92%
<i>Low/Moderate Total</i>	<i>435</i>	<i>9.52%</i>	<i>32,427</i>	<i>5.48%</i>	<i>987</i>	<i>21.59%</i>	<i>78,312</i>	<i>13.24%</i>
Middle	1,901	41.59%	197,995	33.47%	951	20.81%	105,025	17.75%
Upper	2,235	48.9%	361,203	61.05%	1,883	41.19%	304,344	51.44%
Unknown	0	0.0%	0	0.0%	750	16.41%	103,944	17.57%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4,571	100.0%	591,625	100.0%	4,571	100.0%	591,625	100.0%
	Home Improvement							
Low	39	5.53%	474	1.68%	77	10.92%	1,123	3.97%
Moderate	81	11.49%	1,391	4.92%	170	24.11%	4,481	15.85%
<i>Low/Moderate Total</i>	<i>120</i>	<i>17.02%</i>	<i>1,865</i>	<i>6.6%</i>	<i>247</i>	<i>35.04%</i>	<i>5,604</i>	<i>19.83%</i>
Middle	315	44.68%	10,615	37.55%	179	25.39%	6,021	21.3%
Upper	270	38.3%	15,787	55.85%	250	35.46%	15,253	53.96%
Unknown	0	0.0%	0	0.0%	29	4.11%	1,389	4.91%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	705	100.0%	28,267	100.0%	705	100.0%	28,267	100.0%
	Multi-Family							
Low	11	14.47%	3,628	3.31%	0	0.0%	0	0.0%
Moderate	22	28.95%	23,967	21.88%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>33</i>	<i>43.42%</i>	<i>27,595</i>	<i>25.2%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	31	40.79%	42,593	38.89%	0	0.0%	0	0.0%
Upper	12	15.79%	39,333	35.91%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	76	100.0%	109,521	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	76	100.0%	109,521	100.0%	76	100.0%	109,521	100.0%
	HMDA Totals							
Low	236	1.88%	18,626	1.09%	949	7.57%	60,345	3.53%
Moderate	1,038	8.27%	94,311	5.51%	2,481	19.78%	212,130	12.4%
<i>Low/Moderate Total</i>	<i>1,274</i>	<i>10.16%</i>	<i>112,937</i>	<i>6.6%</i>	<i>3,430</i>	<i>27.34%</i>	<i>272,475</i>	<i>15.93%</i>
Middle	5,360	42.73%	576,119	33.69%	2,809	22.39%	315,774	18.46%
Upper	5,910	47.11%	1,021,094	59.71%	4,524	36.07%	794,341	46.45%
Unknown	0	0.0%	0	0.0%	1,781	14.2%	327,560	19.15%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12,544	100.0%	1,710,150	100.0%	12,544	100.0%	1,710,150	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Genoa 2017

Selected Year: 2015

Non Metro OH 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	20	3.06%	1,411	1.44%
Moderate	0	0.0%	0	0.0%	99	15.16%	8,959	9.11%
Low/Moderate Total	0	0.0%	0	0.0%	119	18.22%	10,370	10.55%
Middle	245	37.52%	29,919	30.44%	122	18.68%	14,518	14.77%
Upper	408	62.48%	68,374	69.56%	348	53.29%	66,019	67.17%
Unknown	0	0.0%	0	0.0%	64	9.8%	7,386	7.51%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	653	100.0%	98,293	100.0%	653	100.0%	98,293	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	20	3.96%	1,323	1.69%
Moderate	0	0.0%	0	0.0%	64	12.67%	6,367	8.14%
Low/Moderate Total	0	0.0%	0	0.0%	84	16.63%	7,690	9.84%
Middle	175	34.65%	23,565	30.15%	91	18.02%	10,967	14.03%
Upper	330	65.35%	54,606	69.85%	253	50.1%	47,223	60.41%
Unknown	0	0.0%	0	0.0%	77	15.25%	12,291	15.72%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	505	100.0%	78,171	100.0%	505	100.0%	78,171	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	6	7.32%	131	4.36%
Moderate	0	0.0%	0	0.0%	15	18.29%	539	17.95%
Low/Moderate Total	0	0.0%	0	0.0%	21	25.61%	670	22.32%
Middle	30	36.59%	1,077	35.88%	23	28.05%	735	24.48%
Upper	52	63.41%	1,925	64.12%	31	37.8%	1,387	46.2%
Unknown	0	0.0%	0	0.0%	7	8.54%	210	7.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	82	100.0%	3,002	100.0%	82	100.0%	3,002	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	2	100.0%	295	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	295	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	295	100.0%	2	100.0%	295	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	46	3.7%	2,865	1.59%
Moderate	0	0.0%	0	0.0%	178	14.33%	15,865	8.83%
Low/Moderate Total	0	0.0%	0	0.0%	224	18.04%	18,730	10.42%
Middle	450	36.23%	54,561	30.35%	236	19.0%	26,220	14.59%
Upper	792	63.77%	125,200	69.65%	632	50.89%	114,629	63.77%
Unknown	0	0.0%	0	0.0%	150	12.08%	20,182	11.23%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,242	100.0%	179,761	100.0%	1,242	100.0%	179,761	100.0%

Peer Group CRA Loan Distribution Table

Exam ID: Genoa 2017

Selected Year: 2015

Toledo MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Tract Income				By Tract Income				By Tract Income			
Low	300	4.42%	28,203	7.37%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	783	11.55%	42,601	11.13%	1	0.47%	195	0.91%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	1,083	15.97%	70,804	18.5%	1	0.47%	195	0.91%	0	0.0%	0	0.0%
Middle	2,694	39.72%	163,429	42.7%	118	55.66%	12,590	38.68%	0	0.0%	0	0.0%
Upper	2,934	43.26%	147,140	38.45%	93	43.87%	8,669	40.41%	0	0.0%	0	0.0%
Unknown	1	0.01%	3	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	70	1.03%	1,323	0.35%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6,782	100%	382,699	100%	212	100%	21,454	100%	0	0.0%	0	0.0%
Total \$1 Million or Less	By Revenue				By Revenue				By Revenue			
	3,250	47.92%	116,357	30.4%	151	71.23%	15,524	72.36%	0	0.0%	0	0.0%
	By Loan Size				By Loan Size				By Loan Size			
\$100,000 or Less	6,032	88.94%	99,743	26.06%	144	67.92%	5,262	24.53%	0	0.0%	0	0.0%
\$100,001 - \$250,000	358	5.28%	64,326	16.81%	40	18.87%	6,587	30.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	392	5.78%	218,630	57.13%	28	13.21%	9,605	44.77%	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	6,782	100%	382,699	100%	212	100%	21,454	100%	0	0.0%	0	0.0%

Peer Group CRA Loan Distribution Table

Exam ID: Genoa 2017

Selected Year: 2015

Non Metro OH 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Tract Income				By Tract Income				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%
<i>Low/Moderate Income</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	268	45.35%	6,970	33.64%	5	10.2%	139	5.56%	0	0.0%	0	0.0%
Upper	312	52.79%	13,423	64.78%	44	89.8%	2,362	94.44%	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	11	1.86%	328	1.58%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	591	100%	20,721	100%	49	100%	2,501	100%	0	0.0%	0	0.0%
Total \$1 Million or Less	By Revenue				By Revenue				By Revenue			
	270	45.69%	5,111	24.67%	24	48.98%	1,656	66.21%	0	0.0%	0	0.0%
	By Loan Size				By Loan Size				By Loan Size			
\$100,000 or Less	562	95.09%	7,782	37.56%	44	89.8%	1,345	53.78%	0	0.0%	0	0.0%
\$100,001 - \$250,000	13	2.2%	2,311	11.15%	4	8.16%	856	34.23%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	16	2.71%	10,628	51.29%	1	2.04%	300	12.0%	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	591	100%	20,721	100%	49	100%	2,501	100%	0	0.0%	0	0.0%

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.

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.