

PUBLIC DISCLOSURE

May 13, 2024

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 COMMUNITY REINVESTMENT ACT (CRA) RATING

The Genoa Banking Company (Genoa) is rated: Outstanding

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors and criteria contributing to this rating include:

- The net loan-to-deposit (NLTD) ratio is more than reasonable given the institution's size, financial condition, and assessment area (AA) credit needs;
- A majority of loans and other lending-related activities are in the AA;
- The distribution of loans reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses and farms of different sizes; and,
- The geographic distribution of loans reflects reasonable dispersion throughout the AA.
- The bank's community development performance demonstrates excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination procedures for Intermediate Small Institutions was utilized to evaluate Genoa's CRA Performance under Regulation BB. The evaluation considered CRA performance context, including Genoa's asset size, financial condition, business strategy and market competition, as well as the demographics, economic characteristics, and credit needs of the AAs. The following data was reviewed:

- Genoa's six-quarter average NLTD ratio
- Genoa's CRA performance was evaluated for Home Mortgage Disclosure Act (HMDA)-reportable lending data for the period of January 1, 2022, through December 31, 2022. HMDA loans are comprised of home purchase, refinance, and home improvement loans. Base on loan volume each loan product was evaluated separately. Multi-family, and other purpose closed-end loans were not considered in this evaluation due to limited volume. The evaluation period for small business, consumer, home equity lines of credit, and small farm lending was January 1, 2023, through December 31, 2023. Consumer loans are comprised of motor vehicle, other secured, and other unsecured loans. Based on loan volume each loan product was evaluated separately. A sample of revenues for small business and borrower income for consumer loans was obtained.
- HMDA loans (home purchase, refinance, and home improvement, respectively) received the greatest weight followed by small business loans, consumer loans (motor vehicle, other secured, and other unsecured, respectively), home equity lines of credit, and small farm loans.
- Borrower distribution received more weight than geographic distribution based on the overall percentage of low- and moderate-income (LMI) families (39.3%) compared to LMI geographies (34.3%).
- Aggregated lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AA, was used as a comparison in evaluating Genoa's lending performance in 2022.
- Lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses.
- The evaluation period for community development activities was September 27, 2022, through May 13, 2024. Community development activities are comprised of community development loans, qualified investments, and services.

DESCRIPTION OF INSTITUTION

Genoa is a community bank headquartered in Genoa, Ohio. The bank's characteristics include:

- Genoa is a wholly owned subsidiary of GenBanc, Inc. GenBanc, Inc. has two non-bank subsidiaries, neither of which engage in lending or other CRA-related activities.
- Genoa has total assets of \$600.1 million and total deposits of \$525.0 million as December 31, 2023. Genoa has seen a 16.3% increase in total assets and a 15.4% increase in total deposits since the previous evaluation.
- Genoa maintains its main office with a full-service Automated Teller Machine (ATM) and eight branches with full-service ATMs in Ottawa, Lucas, and Wood counties. The main office in Genoa (Ottawa County) along with two branches in Oregon (Lucas County) and Port Clinton (Ottawa County) are in middle-income tracts. Five branches are in upper-income tracts in Sylvania and Maumee (Lucas County), Elmore and Millbury (Ottawa County), and Rossford (Wood County). The remaining branch is in downtown Toledo (Lucas County) in an unknown-income tract. The main office and seven branches offer drive-thru services and weekend and extended hours of service. The Elmore branch (upper-income tract) does not offer these services.
- On January 16, 2024, Genoa opened a branch in Fremont (Sandusky County). Because this branch opened outside the evaluation period, lending activity from this branch is not being considered in this analysis but will be considered in subsequent evaluations.
- Genoa has not closed any branches since the previous evaluation.
- Genoa is a full-service retail bank that offers traditional products, including consumer and business checking and savings accounts, home equity loans, motor vehicle loans, credit cards, and commercial and agriculture loans.
- Genoa's website, [Genoa.com](https://www.genoa.com), and online and mobile banking supplements its branch and ATM networks. Customers can confirm balances, what transactions have posted, pay bills, transfer funds between accounts, and make deposits.
- Genoa has seen an upward trend in use of its digital and mobile banking platforms. From 2020 through 2023 Genoa experienced a 65.0% increase in the number of online retail and mobile banking users; specifically, business online users increased by 76.5%, remote deposit capture clients increased by 34.5% and Positive Pay¹ accounts increased by 205.0% during this period.

¹Positive Pay is Genoa's account reconciliation tool that protects companies against altered checks and counterfeit check fraud.

As shown in the table below, the loan portfolio composition as of December 31, 2023. Genoa’s primary business focus is residential real estate.

Composition of Loan Portfolio as of December 31, 2023		
Loan Type	#	%
Construction and Land Development	24,926	5.4
Farmland	22,485	4.8
1-4 Family Residential Real Estate	205,914	44.3
Multifamily Residential Real Estate	15,243	3.3
Non-Farm Non-Residential Real Estate	124,844	26.9
Agricultural	3,252	0.7
Commercial and Industrial	32,649	7.0
Consumer	32,882	7.1
Other	2,108	0.5
Gross Loans	464,303	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

Genoa’s investment portfolio as of December 31, 2023, was \$100.1 million, which represented 16.7% of total assets. U.S. Treasury and agency securities accounted for 76.9% of total investments, while federal funds sold, municipal securities, and interest-bearing bank balances accounted for 10.0%, 7.8%, and 5.3% of the remaining total investments, respectively.

There are no known legal, financial, or other factors impeding Genoa’s ability to help meet the credit needs of its communities.

Genoa was rated Satisfactory under the CRA at its previous evaluation conducted September 26, 2022. The lending and community development tests were each rated Satisfactory.

DESCRIPTION OF ASSESSMENT AREA

Genoa is an intrastate bank in Ohio with one delineated AA in the Toledo, OH (Toledo) MSA. In 2023 the Office of Management and Budget revised Metropolitan Statistical Area (MSA) delineations. Among the changes was the removal of Ottawa County from the Toledo MSA to the newly created Sandusky, OH MSA. Since MSA changes took effect January 1, 2024, which is outside the evaluation period, this change was not considered in this analysis but will be considered in subsequent evaluations.

Genoa's AA consists of the entireties of Lucas, Ottawa, and Wood counties, along with one tract in the northwestern portion of Sandusky County. Although Sandusky County is not in the Toledo MSA, this tract was included in the bank's AA since there are no deposit-taking facilities in the county, and the census tract is contiguous to tracts in Ottawa and Wood counties. Genoa's AA excludes Fulton County, which is in the western portion of the Toledo MSA.

- The Census Bureau released new size and population data from the 2020 Census on August 12, 2021, as a result of these changes, the AA was comprised of the following tracts:

Income Tract Designations	
Assessment Area: Toledo, OH MSA #45780	
Income Tract Level	2022-2023
Low	27
Moderate	47
Middle	68
Upper	60
Unknown	14
Total	216

- As of June 30, 2023, the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share report, ranks Genoa 10th among 26 institutions operating in the AA with 3.0% of the deposit market share, compared to the two largest market holders, The Huntington National Bank and Fifth Third Bank National Association, which hold a 24.2% and 19.8% of the market, respectively. Genoa's deposit market share is basically the same in the Toledo MSA.

- The 2022 HMDA Peer Market data indicates that Genoa ranked ninth out of 385 HMDA reporters in Toledo MSA and originated 434 loans. By comparison, first ranked The Huntington National Bank, second ranked Fifth Third Bank National Association, and third ranked Rocket Mortgage, LLC originated 2,379, 1,480, and 783 loans, respectively.

Community Contact

A community contact interview was conducted as part of this evaluation to provide supplemental information regarding the area's credit needs and context to demographic and economic conditions of the local community. The interview was conducted with a consortium of Toledo community stakeholders. The contacts identified the critical needs for more access to affordable housing, homelessness prevention, reliable public transportation, and affordable small dollar loans for LMI individuals and small businesses. The contacts indicated that public transportation does not adequately serve LMI individuals to aid them in getting to work and accessing required services. Contacts stated that homeless rates have dramatically increased as rental rates increase and COVID-19 pandemic assistance comes to an end. The contacts believe that these circumstances have put housing out of reach for more people, and more than ever before individuals and families are becoming homeless for the first time. The contacts noted the need to reduce the number of vacant and abandoned properties and build affordable housing. Contacts also indicated that the area needs large scale redevelopment projects to help spur economic growth and job creation. Contacts agreed local financial institutions can do a better job making affordable small dollar loans available to lower-income individuals to rehabilitate dilapidated housing and/or pay for urgent expenses and small business owners to grow their businesses.

Population Characteristics

Population Change					
Assessment Area: Toledo, OH MSA #45780					
Area	2015 Population	2020 Population	Percent Change – 2015 to 2020	2022 Population	Percent Change – 2020 to 2022
Lucas County	436,261	431,279	-1.1%	426,643	-1.1%
Ottawa County	41,162	40,364	-1.9%	39,978	-1.0%
Sandusky County	60,187	58,896	-2.1%	58,667	-0.4%
Wood County	128,885	132,248	2.6%	131,592	-0.5%
Toledo, OH MSA	648,793	646,604	-0.3%	640,384	-1.0%
Ohio	11,575,977	11,799,448	1.9%	11,756,058	-0.4%
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey 2020 U.S. Census Bureau Decennial Census U.S. Census Bureau Vintage 2022 Population Estimates for the United States and States</i>					

- From 2015 through 2022 the AA experienced a 1.4% loss in population, compared to the MSA which experienced a 1.3% loss in population and Ohio which experienced a 1.6% gain in population.
- 78.6% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- 18.5% of the population in the AA was 65 or older, compared to 16.9% in Ohio.
- AA population is aging and decreasing resulting in a shrinking working population or lack of labor supply and increasing demand for leisure and healthcare services.
- 15.2% of the AA’s population reside in the AA’s LMI tracts.
- According to Census data, Toledo is the most populous city in Lucas County and the fourth largest in Ohio.² In 2023 Toledo had a population of 265,304, which was a decrease of 7.6% since 2010. By comparison, the next largest city in the AA is Bowling Green (Wood County) with a population of 30,384, and its population increased by 1.2%. The AA’s LMI and unknown-income tracts are in either Toledo or Bowling Green. The most populous city in Ottawa County is Port Clinton with a population of 5,933 in 2023, and its population decreased by 2.0% since 2010.³

²[City Population Ohio](#)

³[United States Census Bureau – Quick Facts](#)

Income Characteristics

Borrower Income Levels														
Assessment Area: Toledo, OH MSA #45780														
FFIEC Estimated Median Family Income			Low			Moderate			Middle			Upper		
Year	\$	% Change	0	-	49.9%	50%	-	79.9%	80%	-	119.9%	120%	-	& above
2022	\$78,800		0	-	\$39,399	\$39,400	-	\$63,039	\$63,040	-	\$94,559	\$94,560	-	& above
2023	\$88,700	12.6	0	-	\$44,349	\$44,350	-	\$70,959	\$70,960	-	\$106,439	\$106,440	-	& above

Source: 2022-2023 FFIEC Census Data

- The 2023 median family income (MFI) in the Toledo MSA was \$88,700, it increased by 12.6% since 2022.
- MFI in the Toledo MSA in 2020 was \$70,917, which represents a 25.1% increase from 2020 to 2023.
- In 2020 Ohio’s MFI was \$74,391, which was nearly 5.0% greater than MFI in the Toledo MSA. Ohio minimum wage⁴ in 2023 was \$10.10 per hour or \$21,008 annually. The Federal minimum wage is \$7.25⁵ per hour and has not increased since 2009.

Poverty Rates			
Assessment Area: Toledo, OH MSA #45780			
Area	2020	2021	2022
Lucas County	17.5	17.4	17.9
Ottawa County	7.7	8.4	9.9
Sandusky County	10.4	13.1	12.1
Wood County	9.9	10.9	12.1
Ohio	12.6	13.3	13.4
United States	11.9	12.8	12.6

- Poverty rates in Lucas County exceeded Ohio and national rates in 2020, 2021 and 2022, while poverty rates in Wood and Ottawa counties, respectively were significantly lower than poverty rates in Ohio and national rates for the same period. According to the 2022 State of Poverty in Ohio report,⁶ Lucas County’s poverty rate is the highest in northern Ohio based on employment issues, childcare, student loan debt, and housing concerns.
- Of the 149,309 families in the AA, 25.1% are designated as LMI and 11.5% of families are living below the poverty level, compared to 9.6% of families living below the poverty level in Ohio.

⁴ [Ohio Minimum Wage](#)

⁵ [Federal Minimum Wage](#)

⁶ [The State of Poverty in Ohio](#)

- Supplemental Nutrition Assistance Program (SNAP)⁷ helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

SNAP Assistance Assessment Area: Toledo Ohio	
Area	2021
Lucas County	16.2
Ottawa County	8.5
Wood County	5.1
Ohio	12.7
<i>Source: Federal Reserve Economic Data FRED St. Louis Fed</i>	

- Corresponding with poverty rates, Lucas County had the highest percentage of population receiving SNAP benefits. However, Ottawa County had the second highest percentage of SNAP recipients, followed by Wood County.

Housing Characteristics

Housing Cost Change Assessment Area: Toledo, OH MSA #45780						
Area	Median Housing Value			Median Gross Rent		
	2015	2022	Percent Change	2015	2022	Percent Change
Lucas County	\$104,200	\$144,200	38.4%	\$666	\$879	32.0%
Ottawa County	\$138,800	\$179,100	29.0%	\$696	\$846	21.6%
Sandusky County	\$110,100	\$142,300	29.2%	\$634	\$756	19.2%
Wood County	\$146,300	\$203,300	39.0%	\$727	\$907	24.8%
Toledo, OH MSA	\$114,700	\$159,500	39.1%	\$675	\$880	30.4%
Ohio	\$129,900	\$159,900	23.1%	\$730	\$870	19.2%
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey 2018-2022 U.S. Census Bureau: American Community Survey</i>						

- Median housing values increased from 2015 to 2022 in all counties within the AA and at a greater pace than that of Ohio.
- Median gross rents from 2015 to 2022 increased from 25.9% to 32.0% in the AA. The percentage of rent increases was nearly two times higher in the AA compared to increases

⁷[FRED – SNAP Benefits Recipients](#)

in Ohio. Lucas County experienced the the highest increases in rent during this period. The rise in median gross rents indicates the need for more affordable housing in the AA. According to 2020 Census data, 37.2% of all renters have rental costs that are 30.0% or greater of their income.

- According to HUD's 2023 Fair Market Rent (FMR) data,⁸ the average rent for a two-bedroom unit in Lucas County is \$906.
- With Ohio's minimum wage at \$10.10, renters across Ohio can only afford \$525 in monthly rent. The typical minimum wage worker cannot afford rent for a FMR two-bedroom apartment or would have to work 90 hours to afford a modest two-bedroom apartment in this AA.
- According to the National Low Income Housing Coalition,⁹ full-time workers must earn at least \$19.09 an hour (\$39,702 annual salary) in Ohio to afford a two-bedroom rental apartment, which is almost double the minimum wage in the state. Rents continue to increase nationwide; currently the national average rent is \$1,486 a month, which requires workers to earn a minimum wage of \$28.58 (\$59,446 annual salary).
- There are 287,876 housing units in the AA, of which 54.6% are owner-occupied, 32.9% are rentals, and 12.5% are vacant. Housing units in the AA primarily consist of single-family (71.7%) and multi-family (16.6%) dwellings.
- The median age of housing stock in the AA is 61 years old, and 30.0% of housing units were built prior to 1950. The age of the housing stock across the AA demonstrates a potential need for home improvement lending and refinance or home improvement loans to remove lead-based paint that was commonly used in houses and apartments built before 1978.¹⁰

⁸ [HUD's Fair Market Rent \(FMR\) – FY2023](#)

⁹ [National Low Income Housing Coalition-Ohio](#)

¹⁰ [Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning](#)

Housing Cost Burden Assessment Area: Toledo, OH MSA #45780						
Area	Cost Burden – Owners			Cost Burden – Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Lucas County	61.2%	30.2%	17.8%	70.3%	31.1%	40.7%
Ottawa County	47.2%	23.6%	14.1%	63.6%	13.3%	33.6%
Sandusky County	59.2%	17.2%	12.8%	73.4%	13.5%	34.7%
Wood County	61.9%	25.1%	14.5%	75.2%	26.4%	35.1%
Toledo, OH MSA	59.3%	28.6%	16.6%	70.7%	29.0%	39.1%
Ohio	59.3%	26.1%	16.4%	71.1%	24.7%	38.9%

*Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD). 2016-2020 Comprehensive Housing Affordability Strategy*

- 61.2% of low-income homeowners and 70.3% of low-income renters in Lucas County are cost burdened, compared to 30.2% of moderate-income homeowners and 31.1% of moderate-income renters in the county.
- 61.9% of all homeowners and 75.2% of all low-income renters in Wood County are cost burdened, compared to 25.1% of moderate-income homeowners and 26.4% of moderate-income renters in the county.
- This data shows that cost burden disproportionately affects renter-occupied households, particularly low-income renters as well as low-income homeowners.
- Cost-burdened renters may have a difficult time saving enough money to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

Unemployment Rates Assessment Area: Toledo, OH MSA #45780				
Area	2019	2020	2021	2022
Lucas County	4.7%	10.4%	6.2%	4.4%
Ottawa County	5.7%	9.1%	6.1%	5.2%
Sandusky County	4.3%	8.1%	5.3%	4.7%
Wood County	3.7%	7.1%	4.3%	3.5%
Toledo, OH MSA	4.5%	9.4%	5.7%	4.2%
Ohio	4.2%	8.2%	5.1%	4.0%

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Between 2019 and 2020 unemployment rates increased substantially in response to the COVID-19 pandemic. Unemployment rates were higher in Lucas and Ottawa counties than unemployment rates in Ohio during this period.
- The leading industries in the AA are manufacturing, health care and social services, government, retail trade, accommodation and food services, and transportation and

warehousing. The average private sector wage in Lucas County was \$1,043 which indicates employed persons can afford the median rent of \$879.

- Major employers in the AA include but are not limited to The Anderson Inc., Clarios LLC, Fiat Chrysler Automobiles US, City of Toledo, Port Clinton City Schools, Lucas County government, Ottawa County government, Promedica Health System, Mercy Health Partners, United parcel Service, Inc. (UPS), and Wal-Mart Stores, Inc.¹¹
- Based on 2020 Census data and BroadbandOhio,¹² while approximately 83.1% of households in the AA have a broadband internet subscription, at least 63.5% of the populated area and 30.5% of households do not have access to the minimum bandwidth needed for basic internet activity. Nationally, those with access to a broadband-enabled computer are employed at a higher rate in urban and rural counties.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Genoa's overall CRA performance is rated Outstanding. Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

LENDING TEST

Genoa's performance relative to the lending test is rated Satisfactory based on Genoa's loan-to-deposit ratio, AA concentration, and borrower and geographic distribution.

Net Loan-to-Deposit Ratio (NLTD)

A financial institution's NLTD ratio is evaluated to determine the reasonableness of lending considering performance context, such as Genoa's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions (custom peer group). To assess the bank's performance, we analyzed the NLTD ratio of comparable institutions. The custom peer group was selected based on asset size, market share, and the area where they are located.

¹¹ [Ohio County Economic Profiles](#)

¹² [BroadbandOhio – Availability Gaps](#)

Loan-to-Deposit Ratios								
The Genoa Banking Company, Genoa, OH				The Croghan Colonial Bank, Fremont, OH	The First National Bank of Bellevue, Bellevue, OH	The Old Fort Banking Company, Old Fort, OH	The Union Bank Company, Columbus Grove, OH	CUSTOM PEER RATIO
As of Date	Net Loans \$(000s)	Total Deposits \$(000s)	Bank Ratio	Peer 1 Ratio	Peer 2 Ratio	Peer 3 Ratio	Peer 4 Ratio	Custom Peer Ratio
December 31, 2023	459,816	524,978	87.6	79.1	71.6	56.2	73.5	70.1
September 30, 2023	448,947	500,426	89.7	78.2	64.0	51.8	71.0	66.2
June 30, 2023	440,922	483,186	91.3	78.5	65.8	53.6	69.5	66.8
March 31, 2023	414,780	478,286	86.7	77.2	60.2	52.7	67.1	64.3
December 31, 2022	407,166	452,500	90.0	75.9	64.3	53.4	71.1	66.2
September 30, 2022	389,871	454,724	85.7	72.3	59.1	52.9	66.0	62.5
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation			88.5	76.9	64.1	53.4	69.7	66.0

During this period, Genoa’s NLTD ratio averaged 88.5%, compared to peer ratio at 66.0%. The NLTD ratio ranged from 85.7% to 91.3%. In discussions with bank management, they indicated there is continued deposit growth due to higher annual percentage yields on deposits and decreased demand for loans in this rising interest rate environment. However, Genoa is also experiencing an increased demand for loans since it opened its new branch in Fremont. Given these factors, Genoa’s NLTD ratio is considered more than reasonable given the bank’s size, financial condition, and AA credit needs.

Assessment Area Concentration

During the evaluation period, Genoa’s lending was analyzed to determine the volume of lending inside and outside Genoa’s AA. A majority of loans and other lending-related activities are in the AA.

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Motor Vehicle	394	86.2	10,402	81.5	63	13.8	2,354	18.5
Other – Secured	63	64.3	3,606	67.0	35	35.7	1,780	33.0
Other - Unsecured	77	90.6	541	90.0	8	9.4	60	10.0
Total Consumer related	534	83.4	14,549	77.6	106	16.6	4,194	22.4
Home Improvement	36	92.3	2,748	68.5	3	7.7	1,261	31.5
Home Purchase - Conventional	253	84.9	55,967	81.2	45	15.1	12,948	18.8
Multi-Family Housing	3	60.0	1,481	66.8	2	40.0	736	33.2
Other Purpose Closed-End	20	95.2	982	98.1	1	4.8	19	1.9
Refinancing	122	84.7	26,706	77.2	22	15.3	7,905	22.8
Total HMDA related	434	85.6	87,884	79.4	73	14.4	22,869	20.6
Home Equity	97	87.4	6,861	83.9	14	12.6	1,318	16.1
Total Non-HMDA	97	87.4	6,861	83.9	14	12.6	1,318	16.1
Small Business	195	86.3	62,405	80.2	31	13.7	15,368	19.8
Total Small Business related	195	86.3	62,405	80.2	31	13.7	15,368	19.8
Small Farm	38	88.4	5,866	78.3	5	11.6	1,629	21.7
Total Small Farm related	38	88.4	5,866	78.3	5	11.6	1,629	21.7
Total Loans	1,298	85.0	177,564	79.6	229	15.0	45,377	20.4

Note: Percentages may not total 100.0 percent due to rounding.

Of the bank’s total lending from January 1, 2022, to December 31, 2023, 85.0% by volume and 79.6% by dollar amount were made inside the AA.

Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses and farms of different revenue sizes. The borrower distribution of HMDA, small business, consumer, and small farm lending, and home equity lines of credit is reasonable.

Genoa is a participating financial institution offering Ohio Homebuyer Plus, a new savings program designed to encourage homeownership in Ohio. Beginning in 2024, eligible Ohio residents can open enhanced interest savings accounts at participating financial institutions. Accounts connected with Ohio Homebuyer Plus must be used within five years, maintain a minimum balance of at least \$100, and cannot exceed a maximum balance of \$100,000. Since offering these accounts, Genoa has opened 192 accounts.

Genoa offers Freddie Mac's Home Possible loans. This program allows LMI first-time home buyers to qualify for a mortgage loan. The Home Possible program only requires a 3.0% down payment and has more flexible borrower requirements than other mortgage options. In 2023 Genoa originated 35 Home Possible loans totaling \$4.5 million.

Genoa offers a LMI Home Improvement consumer loan. This loan can be used by LMI homeowners to pay for rehabilitation work to improve the condition of their home at a low annual percentage rate and flexible terms to address housing maintenance issues. During the evaluation period, Genoa originated three LMI Home Improvement loans totaling \$22,597.

HMDA Lending

During the evaluation period Genoa originated 431 HMDA-reportable loans totaling \$86.4 million, including 253 home purchase loans totaling \$55.9 million, 122 refinance loans totaling \$26.7 million, and 36 home improvement loans totaling \$2.7 million. Genoa's performance was compared to the percentage of families (proxy) and the aggregate of all lenders. Genoa's borrower distribution of home purchase, refinance, and home improvement lending is reasonable, especially considering the increase in home prices and rents and high percentage of LMI cost-burdened renters. See Appendix C for other HMDA-reportable lending data.

Home Purchase Lending

In 2022 Genoa originated 253 home purchase loans totaling \$56.0 million. Genoa originated 20 (7.9%) home purchase loan to borrowers with unknown-income designations totaling \$4.0 million, compared to the aggregate of all lenders at 12.8%.

Genoa originated eight (3.2%) home purchase loans to low-income borrowers, which was significantly below the percentage of families (proxy) at 22.8% and the aggregate of all lenders at 9.4%. Genoa originated 40 (15.8%) home purchase loans to moderate-income borrowers, which was comparable to the percentage of families at 16.5% and fell below the aggregate of all lenders at 22.1%.

Considering the increase in home prices, high percentage of LMI cost-burdened renters, and poverty rates, Genoa's borrower distribution of home purchase lending to low-income borrowers is poor and reasonable to moderate-income borrowers.

Refinance Lending

In 2022 Genoa originated 122 refinance loans totaling \$26.7 million. Genoa originated 22 (18%) refinance loans totaling \$5.8 million to borrowers with unknown-income designations, compared to the aggregate of all lenders at 7.1%.

Genoa originated 10 (8.2%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 22.8% and below the aggregate of all lenders at 11.2%. Genoa originated 15 (12.3%) refinance loans to moderate-income borrowers, which was below the percentage of families at 16.5% and the aggregate of all lenders at 23.1%.

Considering the higher interest rates in 2022, Genoa's borrower distribution of refinance lending to LMI borrowers is reasonable.

Home Improvement Lending

In 2022 Genoa originated 36 home improvement loans totaling \$2.8 million. Genoa originated two (5.6%) home improvement loans totaling \$500,000 to borrowers with unknown-income designations, compared to the aggregate of all lenders at 1.9%.

Genoa originated two (5.6%) home improvement loans to low-income borrowers, which was significantly below the percentage of families at 22.8% and below the aggregate of all lenders at 9.7%. Genoa originated six (16.7%) home improvement loans to moderate-income borrowers, which exceeded the percentage of families at 16.5% and was below the aggregate of all lenders at 20.1%.

Considering the poverty levels and historically lower levels of home equity for LMI homeowners, Genoa's borrower distribution of home improvement lending to LMI borrowers is reasonable.

Small Business Lending

During the evaluation period Genoa originated 195 small business loans, totaling \$62.4 million. Genoa's performance was compared to the percentage of small businesses (proxy).

In 2023, Genoa originated 195 loans to businesses of different sizes totaling \$62.4 million, of which 110 (56.4%) loans were extended to businesses with unknown gross annual revenues.

Genoa originated 34 (17.4%) loans totaling \$6.1 million to businesses with revenues of \$1.0 million or less, which was below the percentage of small businesses at 89.5%. However, Genoa originated 86 (44.1%) small dollar loans in amounts of \$100,000 or less. Genoa's willingness to lend in smaller amounts exhibits a good responsiveness to credit needs of small businesses in the AA. Community contacts expressed the need for small dollar loans to help small businesses stay in business and/or expand. Also, a large percentage of businesses had unknown gross annual revenue which can skew results. Considering these factors, the distribution among businesses of different sizes is reasonable.

Consumer Lending

During the evaluation period Genoa originated 534 consumer loans totaling \$14.6 million, including 394 motor vehicle loans totaling \$10.4 million, 63 other secured loans totaling \$3.6 million, and 77 other unsecured loans totaling \$541,000. Genoa's performance was compared to the percentage of households by income (proxy). Genoa's borrower distribution is reasonable for motor vehicle and other secured lending and excellent for other unsecured lending.

Motor Vehicle Lending

In 2023 Genoa originated 394 motor vehicle loans totaling \$10.4 million. Genoa originated 267 (67.8%) motor vehicle loans totaling \$6.8 million (65.5%) to borrowers with unknown-income designations.

Genoa originated 40 (10.2%) motor vehicle loans to low-income borrowers, which was below the percentage of households at 25.5%. Genoa originated 31 (7.9%) motor vehicle loans to moderate-income borrowers, which was below the percentage of households at 15.6%.

While the percentage of motor vehicle lending fell below proxy to LMI borrowers, nearly 68.0% of motor vehicle loans had unknown incomes which can skew results. Among the borrowers with known incomes, Genoa originated the most motor vehicle loans to low-income borrowers. Considering access to transportation is essential for improving upward social mobility for lower-income individuals and communities, Genoa's borrower distribution of motor vehicle lending to LMI borrowers is reasonable.

Other Secured Lending

In 2023 Genoa originated 63 other secured loans totaling \$3.6 million. Genoa originated 15 (23.8%) other secured loans totaling \$920,000 to borrowers with unknown-income designations.

Genoa originated four (6.3%) other secured loans to low-income borrowers, which fell below the percentage of households at 25.5%. Genoa originated 12 (19%) other secured loans to moderate-income borrowers, which exceeded the percentage of households at 15.6%. Genoa's borrower distribution of other secured lending to low-income borrowers is reasonable and excellent to moderate-income borrowers.

Other Unsecured Lending

In 2023 Genoa originated 77 other unsecured loans, totaling \$.541 million. Genoa originated 24 (31.3%) of other unsecured loans totaling \$198,000 to borrowers with unknown-income designations.

Genoa originated 20 (26.0%) other unsecured loans to low-income borrowers, which exceeded the percentage of households at 25.5%. Genoa originated 19 (24.7%) other unsecured loans to moderate-income borrowers, which significantly exceeded the percentage of households at 15.6%. Genoa's borrower distribution of other unsecured lending to LMI borrowers is excellent.

Home Equity Lending

Genoa's performance was compared to the percentage of families (proxy). During the evaluation period Genoa originated 97 home equity lines of credit totaling \$6.9 million. Genoa originated 32 (33.0%) home equity lines of credit totaling \$2.0 million to borrowers with unknown-income designations.

In 2023 Genoa originated 10 (10.3%) home equity lines of credit to low-income borrowers, which was below proxy at 22.8%. Genoa originated 20 (20.6%) home equity lines of credit to moderate-income borrowers, which exceeded proxy at 16.5%. Genoa's borrower distribution of home equity lines of credit to low-income borrowers is reasonable and excellent to moderate-income borrowers.

Small Farm Lending

During the evaluation period Genoa originated 38 small farm loans, totaling \$5.9 million. Genoa’s performance was compared to the percentage of small farms (proxy).

In 2023 Genoa originated 38 loans to farms of different sizes totaling \$5.9 million, of which seven (18.4%) loans were extended to farms with unknown gross annual revenues.

Genoa originated 27 (71.1%) loans totaling \$3.0 million to farms with revenues of \$1.0 million or less, which was below the percentage of small farms at 96.5%. However, Genoa originated 18 (47.4%) small dollar loans in amounts of \$100,000 or less. Genoa’s willingness to lend in smaller amounts exhibits a good responsiveness to credit needs of small farms in the AA. Therefore, the distribution among farms of different sizes is reasonable.

Geographic Distribution of Loans

Genoa’s geographic distribution of loans reflects a reasonable dispersion throughout the AA with a significant level of lending gaps. The geographic distribution of HMDA, small business, consumer, and small farm lending, and home equity lines of credit is reasonable.

Percentage of Lending Penetration		
Tract Income Level	2022	2023
Low	18.5%	29.6%
Moderate	34.0%	57.4%
Middle	60.3%	82.4%
Upper	73.3%	86.7%
Unknown	21.4%	50.0%
Total	50.5%	69.4%

Genoa penetrated 60.0% of its total tracts during the evaluation period, which is a significant level of lending gaps. Genoa had a substantial level of lending gaps in low-income tracts and a significant level in moderate-income tracts. Genoa does not have a major presence in the competitive Toledo market with only a 3.5% deposit market share and eight branches. So, it would be difficult to expect them to serve the entire AA or larger MSA. However, from 2022 through 2023 Genoa was able to increase its overall lending penetration in low-income tracts by

60.0% and by 69.0% in moderate-income tracts, which is noteworthy considering the high-interest rate environment, rising home prices, and the lack of housing and high poverty rates in LMI areas in this market.

HMDA Lending

During the evaluation period Genoa originated 434 HMDA-reportable loans totaling \$87.9 million, including 253 home purchase loans totaling \$55.9 million, 122 refinance loans totaling \$26.7 million, and 36 home improvement loans totaling \$2.7 million. Genoa's performance was compared to the percentage of owner-occupied units (proxy) and the aggregate of all lenders. Genoa's geographic distribution of home purchase, refinance, and home improvement lending is reasonable, especially considering the limited opportunities to originate mortgage loans in LMI tracts that have a limited supply of housing units and high number of rental and vacant units. See Appendix C for other HMDA-reportable lending data.

Home Purchase Lending

In 2022 Genoa originated 253 home purchase loans totaling \$56.0 million. Genoa originated three (1.2%) home purchase loans in low-income tracts, which fell significantly below the percentage of owner-occupied units at 4.8% and aggregate of all lenders of 3.2%. Genoa originated 19 (7.5%) home purchase loans in moderate-income tracts, which fell below the percentage of owner-occupied units at 15.8% and aggregate of all lenders at 16.4%.

Considering the increase in home prices and rents and high level of poverty in these tracts, Genoa's geographic distribution of home purchase lending in low-income tracts is poor and reasonable in moderate-income tracts.

Refinance Lending

In 2022 Genoa originated 122 refinance loans totaling \$26.7 million. Genoa originated three (2.5%) refinance loans in low-income tracts, which fell below the percentage of owner-occupied units at 4.8% and exceeded the aggregate of all lenders at 1.4%. Genoa originated 10 (8.2%) refinance loans in moderate-income tracts, which fell below the percentage of owner-occupied units at 15.8% and aggregate of all lenders of 11.6%.

Considering the high interest rates in 2022 and high level of poverty in these tracts, Genoa's geographic distribution of refinance lending in LMI tracts is reasonable.

Home Improvement Lending

In 2022 Genoa originated 36 home improvement loans totaling \$2.8 million. Genoa originated one (2.8%) home improvement loan in a low-income tract, which fell below the percentage of owner-occupied units at 4.8% and significantly exceeded the aggregate of all lenders at 1.6%. Genoa originated two (5.6%) home improvement loans in moderate-income tracts, which fell below the percentage of owner-occupied units at 15.8% and aggregate of all lenders of 11.1%.

Considering the high level of poverty in these tracts, Genoa's geographic distribution of home improvement lending in LMI tracts is reasonable.

Small Business Lending

During the evaluation period Genoa originated 195 small business loans totaling \$62.4 million. Genoa's performance was compared to the percentage of businesses by tract income (proxy).

In 2023 Genoa originated three (1.5%) small business loans in low-income tracts, which fell significantly below proxy in these tracts at 8.3%. Genoa originated 22 (11.3%) small business loans in moderate-income tracts, which fell below proxy in these tracts at 16.7%. The geographic distribution of small business lending is poor in low-income tracts and reasonable in moderate-income tracts.

Consumer Lending

During the evaluation period Genoa originated 534 consumer loans totaling \$14.5 million, including 394 motor vehicle loans totaling \$10.4 million, 63 other secured loans, totaling \$3.6 million, and 77 other unsecured, totaling \$541,000. Genoa's performance was compared to the percentage of households by tract income (proxy). Genoa's geographic distribution of motor vehicle, other secured, and other unsecured lending is reasonable.

Motor Vehicle Lending

In 2023 Genoa originated 394 motor vehicle loans, totaling \$10.4 million. Genoa originated seven (1.8%) motor vehicle loans in low-income tracts, which fell significantly below the percentage of households at 9.9%. Genoa originated 26 (6.6%) motor vehicle loans to moderate-income borrowers, which fell below the percentage of households at 19.5%. Genoa's geographic

distribution of motor vehicle lending in low-income tracts is poor and reasonable in moderate-income tracts.

Other Secured Lending

In 2023 Genoa originated 63 other secured loans, totaling \$3.6 million. Genoa originated no other secured loans in low-income tracts, compared to the percentage of households at 9.9%. Genoa originated five (7.9%) other secured loans in middle-income tracts, which fell below the percentage of households at 19.5%. Geographic distribution of other secured lending in low-income tracts is poor and reasonable in moderate-income tracts.

Other Unsecured Lending

In 2023 Genoa originated 77 other unsecured loans, totaling \$541,000. Genoa originated three (3.9%) unsecured loans in low-income tracts, which was significantly below the percentage of households at 9.9%. Genoa originated seven (9.1%) other unsecured loans in moderate-income tracts, which fell below the percentage of households at 19.5%. The geographic distribution of other unsecured lending in low-income tracts is poor and reasonable in moderate-income tracts.

Home Equity Lending

During the evaluation period Genoa originated 97 home equity lines of credit, totaling \$6.9 million. Genoa's performance was compared to the percentage of owner-occupied units (proxy).

Genoa originated no home equity lines of credit in the low-income tract, compared to the percentage of owner-occupied units at 4.8%. Genoa originated one (1.0%) home equity lines of credit in a moderate-income tract, which fell significantly proxy at 15.8%. The geographic distribution of home equity lines of credit in LMI tracts is poor.

Small Farm Lending

During the evaluation period Genoa originated 38 small farm loans, totaling \$5.9 million. Genoa's performance was compared to the percentage of farms by tract income (proxy).

In 2023 Genoa originated no small farm loans in LMI tracts, compared to proxy at 1.9%. Since there are a limited number of farms in these tracts, this may have contributed to the lack of loans. Genoa originated four (10.5%) small farm loans in moderate-income tracts, which exceeded proxy

at 4.0%. Considering the limited number of farms in these tracts, the geographic distribution of small farm lending is reasonable in low-income tracts and excellent in moderate-income tracts.

Response to Complaints

Neither Genoa nor this Reserve Bank has received any CRA-related complaints since the previous examination.

COMMUNITY DEVELOPMENT TEST

Genoa’s performance relative to the community development test is rated Outstanding.

Genoa community development performance demonstrates an excellent responsiveness to community development needs in this AA by providing community development loans, qualified donations, and community development services, considering Genoa’s capacity and opportunities in this AA. Genoa’s community development activities support affordable housing initiatives, workforce development to attract and retain jobs, and provide financial literacy and other services to LMI individuals and families. In addition to supporting expressed needs, Genoa’s qualified community development activities also support small businesses and revitalizing and stabilizing moderate-income communities.

Community Development Lending

Genoa originated or renewed seven community development loans totaling approximately \$1.3 million. This represents a significant increase by volume and dollar amount since the previous evaluation. The following table shows the total number of community development loans by purpose, number, and dollar amount.

Purpose of CD Loan	#	\$
Revitalization/Stabilization	2	\$845,097
Services to LMI	4	\$381,809
Affordable Housing	1	\$90,750
Total	7	\$1,317,656

Revitalization/Stabilization

- Two (2) loans totaling \$847,097 provided financing to a nonprofit to purchase and rehabilitate a commercial building in an unknown-income tract, which is surrounded by

low-income tracts. The building was remodeled to house a coffee shop, barber shop, and office space. Revitalizing this space helps bring jobs and attract customers to a low-income area in downtown Toledo. Funding projects to help spur economic growth and job creation was an expressed need identified by community contacts.

Community Services to LMI

- A construction loan totaling \$204,000 provided financing to a nonprofit to build a new 24-hour childcare facility. The nonprofit helps LMI families find affordable and accessible childcare services. Analysis from the Federal Reserve Bank of St. Louis found that childcare is critical to the nation's workforce and economy but difficult to access and afford.¹³
- A loan totaling \$42,409 provided financing to a nonprofit to purchase a service vehicle to call on clients. The nonprofit provides mental health services and substance abuse counseling to LMI students in a low-income community. Access to healthcare and recovery programs, particularly for LMI individuals and communities, is responsive to community needs.
- A working capital loan totaling \$15,000 provided financing to a nonprofit to continue its operations. The nonprofit provides transportation services for LMI seniors and individuals with special needs. Lack of reliable public transportation, especially for LMI individuals, was an expressed need identified by community contacts.
- A working capital loan totaling \$120,000 to a nonprofit to cover payroll costs when reimbursements from insurance companies are delayed. The nonprofit provides health and addiction recovery services in a medically underserved county impacted by the opioid epidemic. Access to healthcare and recovery programs, particularly for LMI individuals and communities, is responsive to community needs.

Affordable Housing

- A loan totaling \$90,750 to purchase and renovate a single-family home in a moderate-income tract. This home is part of Toledo's Rent to Own program designed to help LMI individuals who would like to become homeowners. The program helps renters build equity while renting a home that they can eventually own. Access to affordable housing and funding to rehabilitate dilapidated housing were expressed needs identified by community contacts.

Community Development Investments

Qualified community development investments consisted of small dollar donations. Genoa

¹³[St. Louis Fed – On the Economy Blog](#)

made 21 small dollar donations totaling \$11,355 to 21 organizations during this evaluation period. The following table shows the total number of qualified donations by purpose, number, and dollar amount.

Purpose of Qualified Donations	#	\$
Services to LMI	19	\$9,755
Affordable Housing	2	\$1,600
Total	21	\$11,355

Qualified donations include but are not limited to:

- A donation totaling \$2,500 to a healthcare provider that provides mental health and substance abuse counseling to at-risk middle and high school students in a low-income community.
- A donation totaling \$1,500 to an organization that supports fair and affordable housing initiatives in Toledo.
- A donation totaling \$1,200 to support an organization that provides educational programs to LMI children in a moderate-income area.
- A donation totaling \$1,000 to a nonprofit that provides scholarships LMI students and wraparound services to LMI individuals.

Community Development Services

Bank officers and employees worked with a variety of community service organizations, throughout its AA during the evaluation period.

Most of Genoa’s community development services are provided through serving on boards and committees followed by providing technical assistance. Genoa also provides financial literacy training to LMI individuals. The following tables shows the total number of services, organizations, and employees by purpose.

Purpose of CD Service	# Services	# Orgs	# Employees*
Services to LMI	30	30	16
Economic Development	22	16	16
Affordable Housing	1	1	1
Revitalization/Stabilization	1	1	1
Total	54	48	34
<i>*Employees may be double counted if they provide multiple services</i>			

Community development services include:

- Two employees served on a task force that focuses on affordable housing at the county level
- One employee served on the board of a local college in a moderate-income tract. The college helps maintain and attract jobs and students to the area.
- 14 employees served on boards and/or committees of multiple local chambers of commerce, improvement corporations, land banks, economic development councils, and the farm bureau. Employees helped these organizations attract and retain small businesses and small farms and support economic development.
- 10 employees served on boards and/or committees of several nonprofits that provide a multitude of wraparound services to LMI individuals and families, seniors, and individuals with special needs. Several of the nonprofits address medical needs in medically underserved urban communities, offer workforce development, and provide temporary housing for LMI residents in recovery.
- Seven employees provided technical expertise to 10 organizations through fundraising, grant writing, SBA 504 loan program administration, and verifying scholarship eligibility.

Genoa offers and/or participates in the following financial literacy training activities:

- Real Money, Real World is a hands-on financial literacy program that gives young people the opportunity to make lifestyle and budget choices like those they will make as adults. It is a financial literacy program for junior high and high school students from Ohio State University Extension. The curriculum consists of three parts: a pre-simulation preparation, a hands-on budget management and decision-making simulation and a post-session evaluation of choices made. The program has three primary goals: to increase participants' awareness of how education level and corresponding career choice influence personal income and financial security; to increase the students' knowledge of money management tools used in daily spending for cost-of-living decisions; and to increase participants' awareness of how income and lifestyle choices affect the amount of money

available for discretionary spending. Four employees participated in a school with a majority of students eligible for free- and reduced-lunch program.

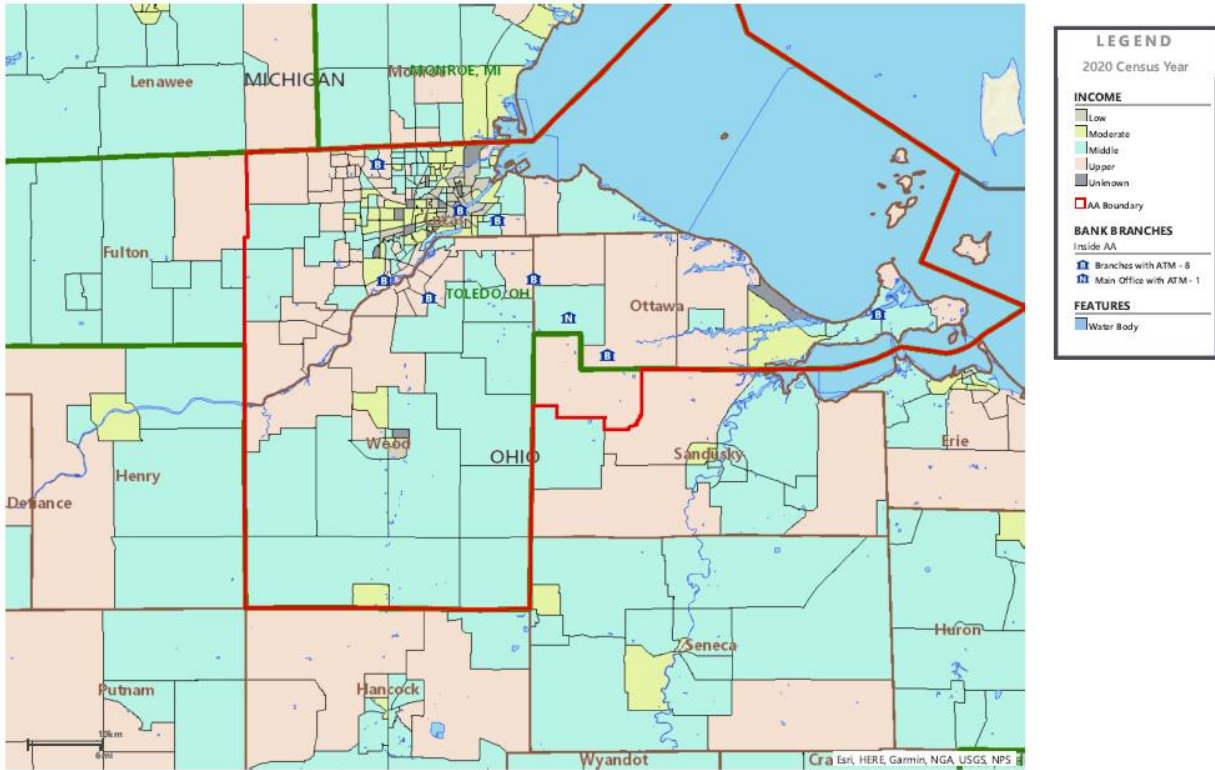
- An employee taught a money banking class in a school district with a majority of students eligible for free- and reduced-lunch program.
- An employee participated in a free fair housing summit at the Lucas County Library to promote more equitable and accessible housing, especially for LMI individuals and families.
- Five employees participated in a free seminar for first-time LMI homebuyers at the Fair Housing Center.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

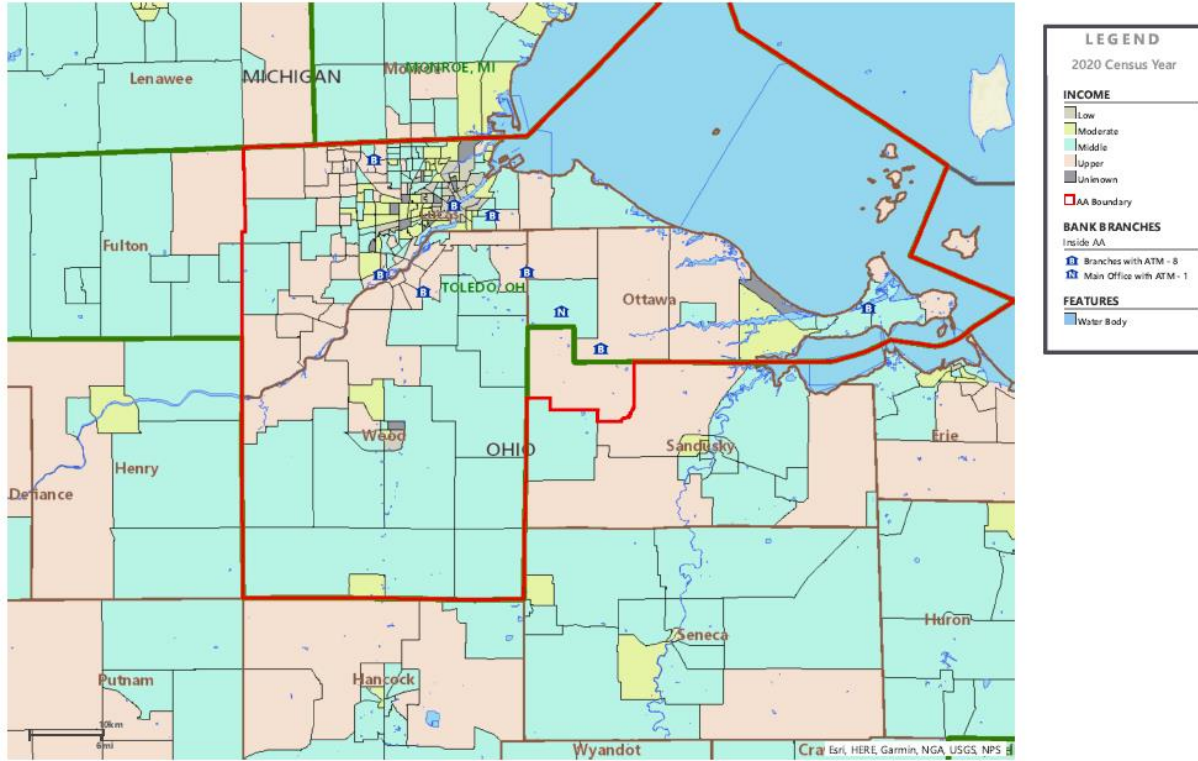
An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

Appendix A – Assessment Area Maps

Assessment Area: 2023 Toledo, OH MSA #45780



Assessment Area: 2022 Toledo, OH MSA #45780



Appendix B – Demographic Tables

2023 TOLEDO, OH MSA #45780 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	27	12.5	11,054	7.4	4,652	42.1	34,030	22.8
Moderate	47	21.8	26,450	17.7	4,669	17.7	24,597	16.5
Middle	68	31.5	51,324	34.4	4,420	8.6	29,271	19.6
Upper	60	27.8	56,176	37.6	2,038	3.6	61,411	41.1
Unknown	14	6.5	4,305	2.9	1,407	32.7	0	0.0
Total AA	216	100.0	149,309	100.0	17,186	11.5	149,309	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	31,000	7,597	4.8	24.5	17,229	55.6	6,174	19.9
Moderate	55,723	24,832	15.8	44.6	24,273	43.6	6,618	11.9
Middle	98,216	57,638	36.6	58.7	29,685	30.2	10,893	11.1
Upper	91,797	63,938	40.6	69.7	17,776	19.4	10,083	11.0
Unknown	11,140	3,296	2.1	29.6	5,649	50.7	2,195	19.7
Total AA	287,876	157,301	100.0	54.6	94,612	32.9	35,963	12.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,996	8.3	1,760	8.2	228	10.1	8	3.2
Moderate	4,018	16.7	3,535	16.4	454	20.1	29	11.7
Middle	7,611	31.7	6,885	32.0	638	28.2	88	35.6
Upper	8,943	37.3	8,113	37.7	724	32.0	106	42.9
Unknown	1,436	6.0	1,200	5.6	220	9.7	16	6.5
Total AA	24,004	100.0	21,493	100.0	2,264	100.0	247	100.0
Percentage of Total Businesses:			89.5		9.4		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	8	1.9	7	1.7	1	7.7	0	0.0
Moderate	17	4.0	15	3.6	2	15.4	0	0.0
Middle	196	45.9	190	46.1	5	38.5	1	50.0
Upper	202	47.3	196	47.6	5	38.5	1	50.0
Unknown	4	0.9	4	1.0	0	0.0	0	0.0
Total AA	427	100.0	412	100.0	13	100.0	2	100.0
Percentage of Total Farms:			96.5		3.0		0.5	
Source: 2023 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2022 TOLEDO, OH MSA #45780 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	27	12.5	11,054	7.4	4,652	42.1	34,030	22.8
Moderate	47	21.8	26,450	17.7	4,669	17.7	24,597	16.5
Middle	68	31.5	51,324	34.4	4,420	8.6	29,271	19.6
Upper	60	27.8	56,176	37.6	2,038	3.6	61,411	41.1
Unknown	14	6.5	4,305	2.9	1,407	32.7	0	0.0
Total AA	216	100.0	149,309	100.0	17,186	11.5	149,309	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	31,000	7,597	4.8	24.5	17,229	55.6	6,174	19.9
Moderate	55,723	24,832	15.8	44.6	24,273	43.6	6,618	11.9
Middle	98,216	57,638	36.6	58.7	29,685	30.2	10,893	11.1
Upper	91,797	63,938	40.6	69.7	17,776	19.4	10,083	11.0
Unknown	11,140	3,296	2.1	29.6	5,649	50.7	2,195	19.7
Total AA	287,876	157,301	100.0	54.6	94,612	32.9	35,963	12.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,996	8.3	1,760	8.2	228	10.1	8	3.2
Moderate	4,018	16.7	3,535	16.4	454	20.1	29	11.7
Middle	7,611	31.7	6,885	32.0	638	28.2	88	35.6
Upper	8,943	37.3	8,113	37.7	724	32.0	106	42.9
Unknown	1,436	6.0	1,200	5.6	220	9.7	16	6.5
Total AA	24,004	100.0	21,493	100.0	2,264	100.0	247	100.0
Percentage of Total Businesses:				89.5		9.4		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	8	1.9	7	1.7	1	7.7	0	0.0
Moderate	17	4.0	15	3.6	2	15.4	0	0.0
Middle	196	45.9	190	46.1	5	38.5	1	50.0
Upper	202	47.3	196	47.6	5	38.5	1	50.0
Unknown	4	0.9	4	1.0	0	0.0	0	0.0
Total AA	427	100.0	412	100.0	13	100.0	2	100.0
Percentage of Total Farms:				96.5		3.0		0.5
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Appendix C –Lending Tables

HMDA Lending Tables

Distribution of 2022 HMDA Reportable Loans By Borrower Income Level Assessment Area: Toledo, OH MSA #45780							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	8	3.2	9.4	614	1.1	4.7	22.8
Moderate	40	15.8	22.1	5,551	9.9	15.3	16.5
Middle	63	24.9	21.6	12,229	21.9	19.9	19.6
Upper	122	48.2	34.0	33,543	59.9	48.3	41.1
Unknown	20	7.9	12.8	4,030	7.2	11.8	0.0
Total	253	100.0	100.0	55,967	100.0	100.0	100.0
Refinance Loans							
Low	10	8.2	11.2	632	2.4	6.1	22.8
Moderate	15	12.3	23.1	1,887	7.1	17.4	16.5
Middle	24	19.7	24.7	4,451	16.7	22.9	19.6
Upper	51	41.8	33.9	13,907	52.1	45.3	41.1
Unknown	22	18.0	7.1	5,829	21.8	8.3	0.0
Total	122	100.0	100.0	26,706	100.0	100.0	100.0
Home Improvement Loans							
Low	2	5.6	9.7	90	3.3	6.7	22.8
Moderate	6	16.7	20.1	246	9.0	16.1	16.5
Middle	8	22.2	25.6	289	10.5	21.5	19.6
Upper	18	50.0	42.7	1,623	59.1	53.2	41.1
Unknown	2	5.6	1.9	500	18.2	2.5	0.0
Total	36	100.0	100.0	2,748	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	22	5.1	9.9	1,427	1.7	5.2	22.8
Moderate	63	14.6	21.7	7,734	9.0	15.7	16.5
Middle	99	23.0	22.9	17,119	19.8	20.6	19.6
Upper	203	47.1	35.5	49,764	57.6	47.9	41.1
Unknown	44	10.2	10.0	10,359	12.0	10.6	0.0
Total	431	100.0	100.0	86,403	100.0	100.0	100.0
<p>Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>							

Distribution of 2022 HMDA Reportable Loans By Borrower Income Level							
Assessment Area: Toledo, OH MSA #45780							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	9.7	0	0.0	5.6	22.8
Moderate	0	0.0	17.4	0	0.0	11.9	16.5
Middle	0	0.0	24.1	0	0.0	19.9	19.6
Upper	0	0.0	44.7	0	0.0	56.2	41.1
Unknown	0	0.0	4.2	0	0.0	6.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	2	10.0	9.9	91	9.3	6.2	22.8
Moderate	2	10.0	22.7	50	5.1	13.7	16.5
Middle	4	20.0	18.8	150	15.3	14.9	19.6
Upper	12	60.0	42.0	691	70.4	57.9	41.1
Unknown	0	0.0	6.5	0	0.0	7.3	0.0
Total	20	100.0	100.0	982	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.8	0	0.0	0.1	22.8
Moderate	0	0.0	0.8	0	0.0	1.4	16.5
Middle	0	0.0	0.8	0	0.0	1.3	19.6
Upper	0	0.0	0.8	0	0.0	1.3	41.1
Unknown	0	0.0	96.7	0	0.0	96.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<p>Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</p>							

Distribution of 2022 HMDA Reportable Loans By Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	3	1.2	3.2	333	0.6	1.7	4.8
Moderate	19	7.5	16.4	2,253	4.0	9.3	15.8
Middle	93	36.8	36.2	18,955	33.9	31.5	36.6
Upper	137	54.2	42.9	34,377	61.4	56.7	40.6
Unknown	1	0.4	1.5	49	0.1	0.9	2.1
Total	253	100.0	100.0	55,967	100.0	100.0	100.0
Refinance Loans							
Low	3	2.5	1.4	359	1.3	0.8	4.8
Moderate	10	8.2	11.6	925	3.5	7.2	15.8
Middle	41	33.6	37.0	9,911	37.1	32.1	36.6
Upper	67	54.9	48.9	15,286	57.2	59.2	40.6
Unknown	1	0.8	1.1	225	0.8	0.7	2.1
Total	122	100.0	100.0	26,706	100.0	100.0	100.0
Home Improvement Loans							
Low	1	2.8	1.6	20	0.7	1.1	4.8
Moderate	2	5.6	11.1	81	2.9	7.6	15.8
Middle	15	41.7	34.7	1,043	38.0	30.8	36.6
Upper	18	50.0	51.6	1,604	58.4	59.8	40.6
Unknown	0	0.0	1.0	0	0.0	0.7	2.1
Total	36	100.0	100.0	2,748	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	15.7	0	0.0	8.4	19.7
Moderate	0	0.0	26.4	0	0.0	13.5	18.9
Middle	2	66.7	38.8	916	61.9	35.6	32.2
Upper	0	0.0	14.0	0	0.0	39.6	21.4
Unknown	1	33.3	5.0	565	38.1	2.9	7.9
Total	3	100.0	100.0	1,481	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	7	1.6	2.5	712	0.8	2.3	4.8
Moderate	32	7.4	14.0	3,286	3.7	9.2	15.8
Middle	157	36.2	36.0	31,096	35.4	32.0	36.6
Upper	235	54.1	46.2	51,951	59.1	55.4	40.6
Unknown	3	0.7	1.3	839	1.0	1.1	2.1
Total	434	100.0	100.0	87,884	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 HMDA Reportable Loans By Income Level of Geography							
Assessment Area: Toledo, OH MSA #45780							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	1.6	0	0.0	0.8	4.8
Moderate	0	0.0	9.0	0	0.0	4.8	15.8
Middle	0	0.0	32.1	0	0.0	24.8	36.6
Upper	0	0.0	56.4	0	0.0	69.0	40.6
Unknown	0	0.0	0.9	0	0.0	0.6	2.1
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.0	0	0.0	0.9	4.8
Moderate	1	5.0	10.2	27	2.7	6.3	15.8
Middle	6	30.0	34.1	271	27.6	29.1	36.6
Upper	13	65.0	50.9	684	69.7	61.3	40.6
Unknown	0	0.0	2.8	0	0.0	2.4	2.1
Total	20	100.0	100.0	982	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.1	0	0.0	2.9	4.8
Moderate	0	0.0	22.1	0	0.0	16.8	15.8
Middle	0	0.0	46.7	0	0.0	43.0	36.6
Upper	0	0.0	25.4	0	0.0	36.3	40.6
Unknown	0	0.0	1.6	0	0.0	1.0	2.1
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Business Lending Tables

Distribution of 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: Toledo, OH MSA #45780					
	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	34	17.4	6,135	9.8	89.5
Over \$1 Million	49	25.1	14,374	23.0	9.4
Revenue Unknown	110	56.4	36,418	58.4	1.0
Total	195	100.0	62,405	100.0	100.0
By Loan Size					
\$100,000 or Less	86	44.1	4,112	6.6	
\$100,001 - \$250,000	45	23.1	7,952	12.7	
\$250,001 - \$1 Million	53	27.2	27,353	43.8	
Total	195	100.0	62,405	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	20	58.8	908	14.8	
\$100,001 - \$250,000	8	23.5	1,396	22.8	
\$250,001 - \$1 Million	6	17.6	3,831	62.4	
Total	34	100.0	6,135	100.0	
<i>Source: 2023 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Distribution of 2023 Small Business Lending By Income Level of Geography Assessment Area: Toledo, OH MSA #45780					
Geographic Income Level	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
Low	3	1.5	344	0.6	8.3
Moderate	22	11.3	10,802	17.3	16.7
Middle	90	46.2	23,045	36.9	31.7
Upper	75	38.5	26,535	42.5	37.3
Unknown	5	2.6	1,679	2.7	6.0
Total	195	100.0	62,405	100.0	100.0
<i>Source: 2023 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Consumer Lending Tables

Distribution of 2023 Consumer Loans by Borrower Income Level Assessment Area: Toledo, OH MSA #45780					
Geographic Income Level	Bank Loans				Households by Household Income %
	#	%	\$(000)	%	
Motor Vehicle Loans					
Low	40	10.2	827	8.0	25.5
Moderate	31	7.9	818	7.9	15.6
Middle	35	8.9	960	9.2	17.0
Upper	21	5.3	978	9.4	41.9
Unknown	267	67.8	6,820	65.6	5.6
Total	394	100.0	10,402	100.0	100.0
Other – Secured Loans					
Low	4	6.3	49	1.4	25.5
Moderate	12	19.0	399	11.1	15.6
Middle	14	22.2	557	15.4	17.0
Upper	18	28.6	1,682	46.6	41.9
Unknown	15	23.8	920	25.5	5.6
Total	63	100.0	3,606	100.0	100.0
Other – Unsecured Loans					
Low	20	26.0	120	22.2	25.5
Moderate	19	24.7	146	27.0	15.6
Middle	12	15.6	67	12.4	17.0
Upper	2	2.6	9	1.7	41.9
Unknown	24	31.2	198	36.6	5.6
Total	77	100.0	541	100.0	100.0
Total Consumer Loans					
Low	64	12.0	996	6.8	25.5
Moderate	62	11.6	1,363	9.4	15.6
Middle	61	11.4	1,583	10.9	17.0
Upper	41	7.7	2,669	18.3	41.9
Unknown	306	57.3	7,938	54.6	5.6
Total	534	534	14,549	100.0	100.0
Source: 2023 FFIEC Census Data 2020 U.S. Census Bureau Decennial Census Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2023 Consumer Loans by Income Level of Geography					
Assessment Area: Toledo, OH MSA #45780					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	\$%	
Motor Vehicle Loans					
Low	7	1.8	148	1.4	9.9
Moderate	26	6.6	694	6.7	19.5
Middle	169	42.9	4,428	42.6	34.7
Upper	185	47.0	5,034	48.4	32.4
Unknown	7	1.8	99	1.0	3.6
Total	394	100.0	10,402	100.0	100.0
Other – Secured Loans					
Low	0	0.0	0	0.0	9.9
Moderate	5	7.9	75	2.1	19.5
Middle	28	44.4	1,266	35.1	34.7
Upper	30	47.6	2,266	62.8	32.4
Unknown	0	0.0	0	0.0	3.6
Total	63	100.0	3,606	100.0	100.0
Other – Unsecured Loans					
Low	3	3.9	17	3.1	9.9
Moderate	7	9.1	63	11.6	19.5
Middle	33	42.9	209	38.6	34.7
Upper	32	41.6	240	44.4	32.4
Unknown	2	2.6	12	2.2	3.6
Total	77	100.0	541	100.0	100.0
Total Consumer Loans					
Low	10	1.9	165	1.1	9.9
Moderate	38	7.1	831	5.7	19.5
Middle	230	43.1	5,903	40.6	34.7
Upper	247	46.3	7,540	51.8	32.4
Unknown	9	1.7	111	0.8	3.6
Total	534	100.0	14,549	100.0	100.0
Source: 2023 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Home Equity Lending Tables

Distribution of 2023 Home Equity Lending By Borrower Income Level Assessment Area: Toledo, OH MSA #45780					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	\$%	
Low	10	10.3	488	7.1	22.8
Moderate	20	20.6	1,020	14.9	16.5
Middle	15	15.5	1,234	18.0	19.6
Upper	20	20.6	2,042	29.8	41.1
Unknown	32	33.0	2,078	30.3	0.0
Total	97	100.0	6,861	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2023 Home Equity Lines of Credit By Income Level of Geography Assessment Area: Toledo, OH MSA #45780					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	4.8
Moderate	1	1.0	194	2.8	15.8
Middle	35	36.1	2,099	30.6	36.6
Upper	61	62.9	4,569	66.6	40.6
Unknown	0	0.0	0	0.0	2.1
Total	97	100.0	6,861	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Farm Lending Tables

Distribution of 2023 Small Farm Lending By Revenue Size of Businesses Assessment Area: Toledo, OH MSA #45780					
	Bank Loans				Total Farms %
	#	%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	27	71.1	3,024	51.6	96.5
Over \$1 Million	4	10.5	1,563	26.6	3.0
Revenue Unknown	7	18.4	1,280	21.8	0.5
Total	38	100.0	5,866	100.0	100.0
By Loan Size					
\$100,000 or Less	18	47.4	989	16.9	
\$100,001 - \$250,000	13	34.2	1,983	33.8	
\$250,001 - \$500,000	5	13.2	1,792	30.5	
Total	38	100.0	5,866	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	15	55.6	764	25.3	
\$100,001 - \$250,000	9	33.3	1,279	42.3	
\$250,001 - \$500,000	3	11.1	981	32.4	
Total	27	100.0	3,024	100.0	
<i>Source: 2023 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Distribution of 2023 Small Farm Lending By Income Level of Geography Assessment Area: Toledo, OH MSA #45780					
Geographic Income Level	Bank Loans				Total Farms %
	#	%	\$(000)	\$%	
Low	0	0.0	0	0.0	1.9
Moderate	4	10.5	356	6.1	4.0
Middle	9	23.7	1,362	23.2	45.9
Upper	25	65.8	4,148	70.7	47.3
Unknown	0	0.0	0	0.0	0.9
Total	38	100.0	5,866	100.0	100.0
<i>Source: 2023 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Appendix D – 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: 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, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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 lines of credit, 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 nonrelatives 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 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 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) 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 Reports 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.