

PUBLIC DISCLOSURE

April 15, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Metamora State Bank
RSSD# 533227

120 East Main Street
Metamora, Ohio 43540

Federal Reserve Bank of Cleveland

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

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

TABLE OF CONTENTS

Institution’s Community Reinvestment Act Rating.....	1
Scope of Examination	1
Description of Institution.....	2
Description of Assessment Area	3
Conclusions with Respect to Performance Criteria.....	8
Fair Lending or Other Illegal Credit Practices Review	14
Appendix A –Assessment Area Map	15
Appendix B – Demographic Information.....	16
Appendix C – Glossary	17

INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING

The Metamora State Bank (Metamora) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

- The net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment areas (AA) credit needs.
- Majority of loans and other lending-related activities are originated inside the AAs.
- A reasonable penetration among individuals of different income (including low- and moderate-income) levels.
- A reasonable geographic distribution of loans throughout the AA.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* were utilized to evaluate Metamora's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. For the purpose of this evaluation, Metamora has one delineated CRA AA in Ohio.

The following data was reviewed:

- Metamora's 21-quarter average NLTD ratio.
- An analysis of home equity lines of credit and consumer loans originated from January 1, 2023, to December 31, 2023.
- Based on the total loan volume by number and dollar amount within the AA, home equity lines of credit received the most weight, followed by consumer lending.
- Consumer loans consist of other motor vehicles, other secured, and unsecured loans. Due to limited volumes, these loans were combined in order to conduct a meaningful analysis.
- Residential real estate, commercial, and agricultural loans were not considered in this evaluation due to limited volume.
- Borrower distribution received more weight than geographic distribution based on the percentage of LMI families (30.3%) compared to the percentage of LMI geographies (17.6%) in the AA.

Additional information:

- While Metamora has branches in a metropolitan statistical area (MSA) and meets the yearly asset thresholds; Metamora has not had 25 originated closed-end home mortgage loans or 200 originated home equity lines of credit in the prior two years. Therefore, Metamora is not a Home Mortgage Disclosure Act (HMDA) reporter.
- Metamora facilitated 187 PPP loans totaling \$6.2 million through the U.S. government's Paycheck Protection Program (PPP) between April 14, 2020, through May 5, 2021, to help small business impacted by the COVID-19 emergency. Seventy-six (76) PPP loans (40.6%)

totaling \$2.8 million were originated inside the bank's AA. These loans were originated outside the current evaluation period and were not considered in the retail lending test.

DESCRIPTION OF INSTITUTION

Metamora is an intrastate community bank headquartered in Metamora, Ohio. Metamora is owned by Metamora Bancorp, Inc., which is also located in Metamora, Ohio. The holding company owns a non-bank subsidiary that is not engaged in lending or other CRA activities.

The bank's characteristics include:

- Metamora had total assets of \$101.0 million and total deposits of \$91.2 million as of December 31, 2023. This represents a 35.7% increase in total assets and a 40.6% increase in deposits since the previous evaluation.
- Metamora maintains its main office with a full-service ATM, two branches with full-service ATMs, and a standalone cash-only ATM in its delineated AA. The main office and standalone cash-only ATM are in Metamora (Fulton County) in an upper-income tract. The standalone cash-only ATM is in Evergreen High School. The remaining two branches are in Maumee in a moderate-income tract and Sylvania in an upper-income tract (Lucas County). The branches in upper-income tracts offer extended and weekend hours of service and drive-thru services. While the branch in the moderate-income tract does not offer these services, the full-service ATM is available 24 hours a day, 7 days a week.
- Metamora did not open or close any branches since the previous evaluation.
- Metamora is a full-service retail bank that offers traditional products, including deposit accounts, consumer, agricultural, commercial, and real estate loans.
- As shown in the table below, Metamora's primary business focus is residential real estate lending.

Composition of Loan Portfolio as of December 31, 2023		
Loan Type	\$(000)	%
Construction and Land Development	844	1.2
Farmland	8,327	12.3
1-4 Family Residential Real Estate	33,566	49.6
Multifamily Residential Real Estate	4,212	6.2
Non-Farm Non-Residential Real Estate	9,498	14.0
Agricultural	4,763	7.0
Commercial and Industrial	5,224	7.7
Consumer	1,230	1.8
Other	0	0.0
Gross Loans	67,664	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

Metamora was rated Satisfactory under the CRA at its previous evaluation conducted February 19, 2019.

There are no known legal, financial, or other factors impeding Metamora's ability to help meet the credit needs in its communities.

DESCRIPTION OF ASSESSMENT AREA

- Metamora has one AA in the Toledo, OH MSA consisting of eastern portion of Fulton County and western portion of Lucas County. The AA excludes the western portion of Fulton County, the eastern portion of Lucas County, and the entireties of Ottawa and Wood counties in the Toledo MSA. The AA also includes one tract in the northwest corner of Monroe County, Michigan, which is in the only county in the Monroe, MI MSA and three tracts in northeastern Lenawee County, Michigan, which is in Nonmetropolitan Michigan. The tract in Monroe County is adjacent to tracts in Lucas County, and the tracts in Lenawee County are adjacent to tracts in Fulton and Lucas counties. Because Metamora has no deposit-taking facilities in Michigan, and the tracts do not extend substantially beyond the MSA boundary, the tracts in Michigan were included in the bank's AA.¹
- The bank's AA changed since the previous CRA evaluation. In 2023 Metamora added nine (two low-, one moderate-, two middle-, and four upper-income) tracts in Maumee and Toledo. The Census Bureau also released new size and population data from the 2020 Census on August 12, 2021, which impacted the number of tracts by income level. As a result of these changes, the AA was comprised of the following tracts in this evaluation period. See Appendix A for AA maps and Appendix B for additional demographic data.

Census Tract Designations	
Assessment Area: Toledo, OH MSA #45780	
Income Tract Level	2023
Low	2
Moderate	11
Middle	25
Upper	35
Unknown	7
Total	75

- Based on the June 30, 2023, Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, Metamora ranked 18th among 25 financial institutions operating in the AA with 0.5% market share. The Huntington National Bank holds the largest share of deposits in the market with 20.4%. Metamora ranked 17th among 26 financial institutions

¹ Because there are only four census tracts in Michigan, performance context focuses on Ohio demographics throughout this evaluation.

in the Toledo MSA with 0.5% of the deposit market share, compared to first ranked The Huntington National Bank with 23.8%.

- 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 community stakeholders as part of a CRA listening session conducted in Toledo in February 2024. Community stakeholders identified critical needs for more access to affordable housing, homelessness prevention, reliable public transportation, and affordable small dollar loans for LMI individuals and small businesses. Community stakeholders indicated public transportation does not adequately serve LMI individuals to help them get to work or easily access essential social services. The stakeholders indicated homeless rates have dramatically increased as rental rates have increased and several emergency rental assistance program(s) are ending. Stakeholders believe these circumstances have put housing out of reach for more people than ever before and that more individuals and families are at an increased risk of becoming homeless for the first time. Stakeholders indicated there is a need to reduce neighborhood blight and build more affordable housing. They also said Toledo needs large-scale redevelopment projects to help spur economic growth and job creation. Community stakeholders agreed local financial institutions could do a better job making small dollar loans available to LMI individuals to rehabilitate dilapidated housing and/or pay for emergency expenses and for small business owners to grow their businesses.

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
Lenawee County, Michigan	98,902	99,423	0.5%	98,567	-0.9%
Monroe County, Michigan	150,436	154,809	2.9%	155,609	0.5%
Fulton County, Ohio	42,485	42,713	0.5%	42,171	-1.3%
Lucas County, Ohio	436,261	431,279	-1.1%	426,643	-1.1%
Monroe, MI MSA	150,436	154,809	2.9%	155,609	0.5%
Toledo, OH MSA	648,793	646,604	-0.3%	640,384	-1.0%
Michigan	9,900,571	10,077,331	1.8%	10,034,113	-0.4%
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>					

- Fulton and Lucas counties experienced declines in population between 2015 and 2022 at 0.7% and 2.2% respectively.
- AA population is decreasing which could increase the economic pressure on the workforce.

- 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 years of age or older, compared to 16.9% in Ohio.
- A higher elderly population may affect economic growth and the ability of government and communities to provide adequate resources for older adults, including but not limited to healthcare services.
- 13.4% of the AA's population reside in LMI tracts.
- According to 2022 Census data, Sylvania township (Lucas County) had a population of 31,741, which was an increase of 1.0% between 2020 and 2022. Metamora (Fulton County) had a population of 556, which was a decrease of 8.0% between 2020 to 2022. By comparison, Toledo is the most populous city in Lucas County and the fourth largest in Ohio² According to 2022 Census data, Toledo had a population of 266,301, which was a decrease of 1.7% between 2020 and 2022.

Borrower Income Levels 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
2023	\$88,700		0	- \$44,349	\$44,350	- \$70,959	\$70,960	- \$106,439	\$106,440 - & above

Source: 2023 FFIEC Census Data

- The 2023 median family income (MFI) in the Toledo MSA was \$88,700 compared to the 2020 MFI at \$70,917. The MFI increased by 25.1% during this time period.

Poverty Rates Assessment Area: Toledo, OH MSA #45780			
Area	2020	2021	2022
Lenawee County, Michigan	9.5	11.1	11.6
Monroe County, Michigan	9.7	9.5	9.6
Fulton County, Ohio	8.3	8.1	8.1
Lucas County, Ohio	17.5	17.4	17.9
Michigan	12.6	13.0	13.3
Ohio	12.6	13.3	13.4
United States	11.9	12.8	12.6

Source: U.S. Census Bureau Small Area Income and Poverty Estimates Program

- Poverty rates in Lucas County exceeded Ohio and national rates in 2020, 2021 and 2022; while poverty rates in Fulton County were significantly lower than Ohio and national rates for the same period. According to 2022 State of Poverty in Ohio report,³ the poverty rate in Lucas County is the highest in northern Ohio based on employment issues, childcare, student loan debt, and housing concerns.

² [City Population Ohio](#) / Metamora's AA excludes a large portion of Toledo.

³ [The State of Poverty in Ohio](#)

- Of the 58,019 families in the AA, 30.2% are designated as LMI and 6.9% of families are living below the poverty level, compared to 9.6% of families living below the poverty level in Ohio.
- Of the 92,471 households in the AA, 10.8% are below the poverty level and 2.4% are receiving public assistance.
- Supplemental Nutrition Assistance Program (SNAP) 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. According to Federal Reserve Economic Data (FRED),⁴ Lucas County had the highest percentage of population receiving SNAP benefits at 16.0%, followed by Fulton County at 7.2%. SNAP recipient rates correspond with poverty rates.

Housing Cost Change						
Assessment Area: Toledo, OH MSA #45780						
Area	Median Housing Value			Median Gross Rent		
	2015	2022	Percent Change	2015	2022	Percent Change
Lenawee County, Michigan	\$114,900	\$168,100	46.3%	\$731	\$924	26.4%
Monroe County, Michigan	\$137,200	\$202,200	47.4%	\$784	\$996	27.0%
Fulton County, Ohio	\$129,500	\$163,100	25.9%	\$641	\$807	25.9%
Lucas County, Ohio	\$104,200	\$144,200	38.4%	\$666	\$879	32.0%
Monroe, MI MSA	\$137,200	\$202,200	47.4%	\$784	\$996	27.0%
Toledo, OH MSA	\$114,700	\$159,500	39.1%	\$675	\$880	30.4%
Michigan	\$122,400	\$201,100	64.3%	\$783	\$1,037	32.4%
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>						

- While the median housing values increased from 2015 to 2022 in Fulton and Lucas counties, housing values did not keep pace with median housing values in the Toledo MSA.
- Median gross rents from 2015 to 2022 increased from 25.9% to 32.0% in Fulton and Lucas counties, respectively. AA rents were almost two times higher than rents in Ohio. Lucas County experienced the highest increases in rent.
- 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 2022 Fair Market Rents (FMR) data,⁵ the average rent for a two-bedroom unit in Lucas and Fulton counties is \$806.

⁴ [FRED | St. Louis Fed – SNAP Benefits Recipients in Ohio \(June 2022\)](#)

⁵ [HUD's Fair Market Rents – Final FY2022](#)

- With Ohio's minimum wage at \$10.45 (as of January 1, 2024),⁶ renters across Ohio can only afford \$543 in monthly rent. The typical minimum wage worker cannot afford rent for a FMR two-bedroom apartment or would have to work 78 hours to afford a modest two-bedroom apartment in this AA.
- According to the National Low Income Housing Coalition,⁷ 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 than 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).⁸
- There are 98,675 housing units in the AA, of which 64.7% are owner-occupied, 29.0% are rentals, and 6.3% are vacant. Housing units in the AA primarily consist of single-family dwellings (72.2%).
- The median age of housing stock in the AA is 52 years old, and 14.4% 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 1978.⁹

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
Lenawee County, Michigan	62.1%	33.3%	17.8%	76.2%	36.9%	38.9%
Monroe County, Michigan	59.7%	25.4%	16.7%	76.9%	32.9%	44.3%
Fulton County, Ohio	51.3%	28.1%	14.2%	68.4%	22.3%	30.5%
Lucas County, Ohio	61.2%	30.2%	17.8%	70.3%	31.1%	40.7%
Monroe, MI MSA	59.7%	25.4%	16.7%	76.9%	32.9%	44.3%
Toledo, OH MSA	59.3%	28.6%	16.6%	70.7%	29.0%	39.1%
Michigan	61.2%	26.1%	17.7%	74.8%	32.5%	43.0%
Ohio	59.3%	26.1%	16.4%	71.1%	24.7%	38.9%
<i>Cost Burden is housing cost that equals 30 percent or more of household income.</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy</i>						

- 51.3% of low-income homeowners and 68.4% of low-income renters in Fulton County are cost burdened, compared to 28.1% of moderate-income homeowners and 22.3% of moderate-income renters in the county.

⁶ [Ohio Minimum Wage](#)

⁷ [National Low Income Housing Coalition - Ohio](#)

⁸ [National Low Income Housing Coalition – Nationally](#)

⁹ [Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning](#)

- 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.
- 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
Lenawee County, Michigan	3.9%	9.2%	5.5%	4.7%
Monroe County, Michigan	3.9%	9.2%	6.0%	4.8%
Fulton County, Ohio	4.2%	7.9%	4.8%	4.0%
Lucas County, Ohio	4.7%	10.4%	6.2%	4.4%
Monroe, MI MSA	3.9%	9.2%	6.0%	4.8%
Toledo, OH MSA	4.5%	9.4%	5.7%	4.2%
Michigan	4.1%	10.0%	5.8%	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 in Lucas and Fulton counties. The average unemployment rate in these counties increased from 4.2% in 2019 to 10.4% in 2020. Unemployment rates were higher in Lucas County than unemployment rates in Ohio during this period. Unemployment rates in Fulton County were comparable to unemployment rates in Ohio during this period.
- As reported by the Ohio Office of Research:¹⁰
 - Land use in Fulton County is primarily rural with less than 10.0% available for urban (i.e., residential, commercial, industrial, or recreational) development. However, 50.0% of Lucas County is available for urban development.
 - The leading industries in the AA are health care and social assistance, manufacturing, government, retail trade, accomodation and food services, and adminstrative and waste services. The average private sector wage in Fulton County was \$946 which indicates that employed persons can afford the median rent of \$768. The average private sector wage in Lucas County was \$1,043 which indicates employed persons can afford the median rent of \$803.
 - Major employers in Lucas County include The Anderson Inc., Clarios LLC, Fiat Chrysler Automobiles US, City of Toledo, and Dana Corp.
 - Major employers in Fulton County include ConAgra, Fulton County Government, Haas Door Company, Fulton County Health Center, and Internaltional Automotive Components.

¹⁰ [Ohio County Trends](#)

- Based on 2020 Census data and BroadbandOhio,¹¹ while approximately 83.1% of households in the AA that 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 CRITERIA

Net Loan-to-Deposit Ratio (NLTD)

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending considering performance context, such as Metamora's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison, to similarly situated FDIC institutions (customer peer group). The custom peer group was selected based on asset size, product offerings, market share, and area where they are located.

Loan-to-Deposit Ratios								
The Metamora State Bank, Metamora, OH				Bank Michigan, Brooklyn, MI	Blissfield State Bank, Blissfield, MI	The Marblehead Bank, Marblehead, OH	The Sherwood State Bank, Sherwood, 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	66,846	91,240	73.3	90.0	49.6	37.3	86.0	65.7
September 30, 2023	64,909	87,353	74.3	85.7	54.8	36.2	87.8	66.1
June 30, 2023	62,040	85,369	72.7	93.2	52.0	33.6	84.1	65.7
March 31, 2023	62,528	86,790	72.1	93.2	49.5	34.2	85.3	65.5
December 31, 2022	62,723	88,453	70.9	90.5	48.1	33.1	83.0	63.7
September 30, 2022	59,469	87,026	68.3	89.5	53.5	28.5	78.5	62.5
June 30, 2022	61,012	87,736	69.5	89.5	52.1	28.4	72.1	60.5
March 31, 2022	60,278	89,816	67.1	91.8	46.5	30.0	70.3	59.7
December 31, 2021	61,947	88,555	70.0	82.0	44.1	29.0	70.3	56.3
September 30, 2021	64,168	85,846	74.8	75.2	48.2	26.1	72.2	55.4
June 30, 2021	65,367	86,059	76.0	86.4	48.0	27.8	75.4	59.4
March 31, 2021	64,261	86,798	74.0	94.5	48.7	32.2	77.0	63.1
December 31, 2020	62,775	81,559	77.0	86.5	50.8	34.3	79.9	62.9
September 30, 2020	65,394	79,302	82.5	102.5	56.3	37.9	82.1	69.7
June 30, 2020	63,951	75,382	84.8	100.3	55.0	42.4	85.2	70.7
March 31, 2020	59,742	69,884	85.5	86.0	54.8	44.2	87.0	68.0
December 31, 2019	56,751	72,909	77.8	90.5	54.3	44.5	86.6	69.0
September 30, 2019	54,084	72,636	74.5	90.4	57.0	44.4	87.0	69.7
June 30, 2019	55,113	67,635	81.5	87.9	58.2	44.4	87.6	69.5
March 31, 2019	52,935	63,823	82.9	86.6	54.4	43.2	84.2	67.1
December 31, 2018	53,355	64,890	82.2	89.9	54.9	45.2	86.1	69.0
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation			75.8	89.6	51.9	36.0	81.3	64.7

- Metamora's NLTD ratio averaged 75.8% compared to the custom peer group average of 64.7%. In discussions with 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. Overall, Metamora's NLTD ratio is reasonable given the bank's size, financial condition, and AA credit needs.

¹¹ [BroadbandOhio – Availability Gaps](#)

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs.¹²

Lending Inside and Outside the Assessment Areas January 1, 2023-December 31, 2023								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Motor Vehicle	21	77.8	391	77.1	6	22.2	116	22.9
Other – Secured	10	55.6	174	66.6	8	44.4	87	33.4
Other - Unsecured	1	100.0	1	100.0	0	0.0	0	0.0
Total Consumer related	32	69.6	565	73.5	14	30.4	203	26.5
Home Equity	46	82.1	4,166	84.1	10	17.9	787	15.9
Total Non-HMDA	46	82.1	4,166	84.1	10	17.9	787	15.9
Total Loans	78	76.5	4,731	82.7	24	23.5	990	17.3
Note: Percentages may not total 100.0 percent due to rounding.								

During the evaluation period, 76.5% of total loans by volume and 82.7% by dollar amount was made in the AA. Also, the majority of total consumer and home equity loans by volume and dollar amount were made inside the AA.

Lending to Borrowers of Different Income Levels

Metamora has a reasonable penetration among borrowers of different sizes. Borrower distribution of home equity lines of credit and consumer loans is reasonable.

Home Equity Lending

During the evaluation period, Metamora originated 46 home equity lines of credit totaling \$4.2 million, of which nine (19.6%) home equity lines of credit totaling \$693,000 were originated to borrowers with unknown incomes. Metamora's performance was compared to the percentage of families (proxy). Metamora's borrower distribution of home equity lines of credit is reasonable.

¹² Loan data used to compile this information uses the borrower's address and not the address of the collateral.

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	6	13.0	269	6.5	15.2
Moderate	3	6.5	450	10.8	15.0
Middle	12	26.1	670	16.1	20.3
Upper	16	34.8	2,084	50.0	49.5
Unknown	9	19.6	693	16.6	0.0
Total	46	100.0	4,166	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.					

Metamora originated six (13.0%) home equity lines of credit to low-income borrowers, which was below proxy at 15.2%. Metamora originated three (6.5%) home equity lines of credit to moderate-income borrowers, which was significantly below proxy at 15.0%. Borrower distribution of home equity lines of credit to LMI borrowers is reasonable considering the poverty rates.

Consumer Lending

During the evaluation period, Metamora originated 32 consumer loans totaling \$566,000. Metamora originated seven (21.9%) consumer loans to borrowers with unknown incomes totaling \$150,000. Metamora's performance was compared to the percentage of household income (proxy). Metamora's borrower distribution of consumer loans is reasonable.

Distribution of 2023 Consumer Loans By Borrower Income Level Assessment Area: Toledo, OH MSA #45780					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	#%	\$(000)	\$%	
Low	4	12.5	36	6.4	18.3
Moderate	9	28.1	182	32.2	13.9
Middle	11	34.4	185	32.7	17.7
Upper	1	3.1	12	2.1	50.1
Unknown	7	21.9	150	26.5	1.4
Total	32	100.0	566	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.					

Metamora originated four (12.5%) consumer loans to low-income borrowers, which was below the percentage of households at 18.3%. Metamora originated nine (28.1%) consumer loans to moderate-income borrowers, which significantly exceeded the percentage of families at 13.9%.

Borrower distribution of consumer loans to low-income borrowers is reasonable considering the poverty rates and excellent to moderate-income borrowers.

Geographic Distribution of Loans

The geographic distribution of loans reflects a reasonable dispersion throughout the AA. The geographic distribution of home equity lines of credit and consumer loans is reasonable. There is a substantial level of lending gaps in the AA.

Percentage of Lending Penetration	
Tract Income Level	2023
Low	50.0%
Moderate	9.1%
Middle	40.0%
Upper	60.0%
Unknown	0.0%
Total	44.0%

Metamora penetrated 44.0% of its total tracts during the evaluation period. In moderate-income tracts, Metamora only penetrated one of 11 tracts, which is a substantial level of lending gaps. However, Metamora was able to penetrate one of two low-income tracts. Given Metamora's limited market presence and loan volume and the significant amount of competition, it may be difficult to expect Metamora to penetrate the entire AA or larger MSA.

Home Equity Lending

During the evaluation period, Metamora originated 46 home equity lines of credit totaling \$4.2 million. Metamora's performance was compared to owner-occupied units (proxy). Metamora's geographic distribution of home equity lines of credit is reasonable.

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	0.7
Moderate	1	2.2	80	1.9	9.9
Middle	15	32.6	1,382	33.2	34.6
Upper	30	65.2	2,704	64.9	53.4
Unknown	0	0.0	0	0.0	1.5
Total	46	100.0	4,166	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.					

Metamora originated no home equity lines of credit in low-income tracts, compared to the percentage of owner-occupied units in these tracts at 0.7%. Metamora originated one (2.2%) home equity line of credit in a moderate-income tract, which was substantially below the percentage of owner-occupied units in these tracts at 9.9%. While this appears to be a very poor distribution, the proxy at 0.7% and 9.9% shows there are a limited number of owner-occupied units in these tracts. Additionally, poverty rates in LMI tracts are at 38.0% and 13.5% respectively. Therefore, the geographic distribution in LMI tracts is reasonable.

Consumer Lending

During the evaluation period, Metamora originated 32 consumer loans totaling \$566,000 thousand. Metamora's performance was compared to percentage of household units (proxy). Metamora's geographic distribution of consumer loans is reasonable.

Distribution of 2023 Consumer Loans By Income Level of Geography					
Assessment Area: Toledo, OH MSA #45780					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	\$%	
Low	1	3.1	26	4.6	2.8
Moderate	0	0.0	0	0.0	12.9
Middle	8	25.0	185	32.7	36.2
Upper	23	71.9	355	62.7	45.2
Unknown	0	0.0	0	0.0	2.9
Total	32	100.0	566	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.					

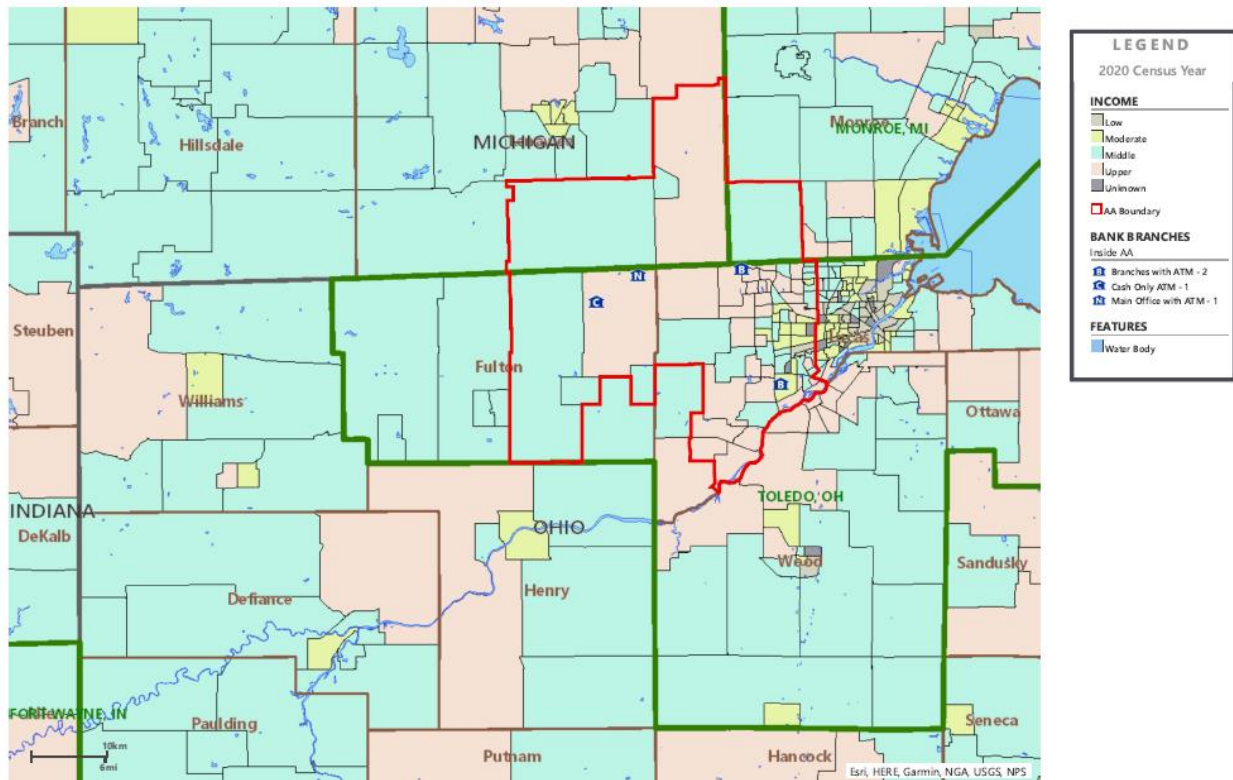
Metamora originated one (3.1%) consumer loan in a low-income tract, which exceeded the percentage of household units in these tracts at 2.8%. Geographic distribution in low-income tracts is excellent, especially considering the bank's minimal market share. Metamora originated no consumer loans in moderate-income tracts, compared to the percentage of owner-occupied units in these tracts at 12.9%. While this appears to be a very poor distribution, Metamora has a minimal market share, and poverty rates in these tracts are 13.5%. Therefore, the geographic distribution in moderate-income tracts is reasonable.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The Federal Reserve Bank of Cleveland conducted a fair lending analysis performed under Regulation B – Equal Credit Opportunity Act and Fair Housing Act requirements and was conducted concurrently with this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A - ASSESSMENT AREA MAP

Assessment Area: 2023 Toledo, OH MSA #45780



APPENDIX B – DEMOGRAPHIC INFORMATION

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	2	2.7	1,019	1.8	385	37.8	8,829	15.2
Moderate	11	14.7	6,435	11.1	867	13.5	8,717	15.0
Middle	25	33.3	20,372	35.1	1,409	6.9	11,777	20.3
Upper	35	46.7	29,019	50.0	1,074	3.7	28,696	49.5
Unknown	2	2.7	1,174	2.0	260	22.1	0	0.0
Total AA	75	100.0	58,019	100.0	3,995	6.9	58,019	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,803	441	0.7	15.7	2,113	75.4	249	8.9
Moderate	12,741	6,339	9.9	49.8	5,623	44.1	779	6.1
Middle	35,957	22,075	34.6	61.4	11,388	31.7	2,494	6.9
Upper	44,288	34,077	53.4	76.9	7,704	17.4	2,507	5.7
Unknown	2,886	935	1.5	32.4	1,776	61.5	175	6.1
Total AA	98,675	63,867	100.0	64.7	28,604	29.0	6,204	6.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	195	1.8	179	1.9	16	1.6	0	0.0
Moderate	1,485	13.9	1,275	13.2	197	20.2	13	12.5
Middle	3,612	33.7	3,251	33.8	329	33.8	32	30.8
Upper	5,163	48.2	4,688	48.7	418	43.0	57	54.8
Unknown	250	2.3	235	2.4	13	1.3	2	1.9
Total AA	10,705	100.0	9,628	100.0	973	100.0	104	100.0
Percentage of Total Businesses:					9.1		1.0	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.7	2	0.8	0	0.0	0	0.0
Moderate	5	1.8	3	1.1	2	15.4	0	0.0
Middle	140	50.5	133	50.8	6	46.2	1	50.0
Upper	128	46.2	122	46.6	5	38.5	1	50.0
Unknown	2	0.7	2	0.8	0	0.0	0	0.0
Total AA	277	100.0	262	100.0	13	100.0	2	100.0
Percentage of Total Farms:					4.7		0.7	
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.								

APPENDIX C – GLOSSARY

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, 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 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 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 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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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 geography.