



PUBLIC DISCLOSURE

March 1, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Savings and Loan Association of Lakewood
Charter Number: 703536

14806 Detroit Ave
Lakewood, OH 44107

Office of the Comptroller of the Currency

200 Public Square Suite 1610
Cleveland, OH 44144-2241

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, and should not 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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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of **First Federal Savings and Loan Association of Lakewood** with respect to the Lending, Investment, and Service Tests:

Performance Levels	First Federal Savings and Loan Association of Lakewood Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory	X		
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on a good level of overall lending in the state of Ohio. The bank demonstrated a high level of lending in the assessment area (AA), excellent lending activity when compared to deposit market share, good geographic distribution of home mortgage and small loans to businesses, adequate distribution of home mortgage loans among borrowers of different incomes and small business loans among business of different sizes, and an adequate level of community development (CD) loans.
- The Investment Test rating is based on an overall adequate level of CD investments in the state of Ohio.
- The Service Test rating is based on the bank’s retail services being accessible to geographies and individuals of different income levels and a significant level of CD services in the state of Ohio.
- The bank offered several innovative and flexible loan programs that focused on making home ownership affordable and promoting small businesses, which had a positive impact on the bank’s lending performance in the state of Ohio. Additionally, the bank showed excellent responsiveness to the credit needs of its borrowers during the COVID-19 pandemic by providing loan modification opportunities including extensions and deferrals and participating in the Small Business Administration’s (SBA) Paycheck Protection Program (PPP).

Lending in Assessment Areas

A high percentage of the bank’s loans are within its AAs.

During the evaluation period, the bank originated and purchased 62.5 percent by number and 59.3 percent by dollar of its total loans inside the bank’s AAs. This analysis is performed at the bank level rather than

the AA level. This level of lending had a positive impact on the bank's overall geographic distribution of lending by income level of geography.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2017	1,738	52.4	1,581	47.6	3,319	330,589	48.0	358,149	52.0	688,738
2018	1,888	57.5	1,395	42.5	3,283	366,766	51.4	346,714	48.6	713,480
2019	2,261	66.0	1,166	34.0	3,427	509,779	63.8	289,339	36.2	799,118
2020	2,916	68.1	1,364	31.9	4,280	680,471	66.2	346,666	33.8	1,027,137
Subtotal	8,803	61.5	5,506	38.5	14,309	1,887,605	58.5	1,340,868	41.5	3,228,473
Small Business										
2017	58	93.5	4	6.5	62	14,305	90.6	1,492	9.4	15,797
2018	113	90.4	12	9.6	125	15,704	90.3	1,688	9.7	17,392
2019	180	93.8	12	6.3	192	25,199	93.1	1,856	6.9	27,055
2020	109	87.9	15	12.1	124	22,725	80.9	5,359	19.1	28,084
Subtotal	460	91.5	43	8.5	503	77,933	88.2	10,395	11.8	88,328
Total	9,263	62.5	5,549	37.5	14,812	1,965,538	59.3	1,351,263	40.7	3,316,801
<i>Source: Bank Data. Evaluation Period: 1/1/2017 - 12/31/2020. Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

First Federal Savings and Loan Association of Lakewood (FFL or bank) is a \$2.2 billion full-service interstate bank headquartered in Lakewood, Ohio. It is a wholly owned subsidiary of First Mutual Holding Company (FMHC), a \$2.4 billion, four-bank holding company, also headquartered in Lakewood, Ohio. Management created the holding company in 2015 to purchase small, well-capitalized federal savings associations. FMHC also owns First Mutual Federal Savings Bank, Warsaw Federal Savings & Loan Association, and Blue Grass Federal Savings & Loan Association. The bank has one active subsidiary, Lake Properties, LTD, that is primarily used for acquiring FFL's other real estate owned properties.

The bank offers traditional loan products, which include home mortgage, construction, commercial, commercial real estate, small business, home equity, and consumer loans. During 2020, the bank also offered PPP loans through the SBA. FFL's principal lines of business are the origination of residential home mortgages and business loans.

During the evaluation period, the bank's loan portfolio grew 24.6 percent. As of December 31, 2020, the loan portfolio totaled \$1.7 billion, 87.8 percent of which was secured by real estate. The loan portfolio is comprised of 72.9 percent residential mortgages, 11.2 percent nonfarm nonresidential properties, 7.3 percent commercial and industrial loans, 4.9 percent consumer loans, and 3.7 percent multi-family loans.

FFL's consumer deposit related products and services include checking, savings, money market accounts, certificates of deposit, individual retirement accounts, online and mobile banking, bill pay, automated teller machine (ATM) services and overdraft protection. Consumers can also open checking, savings, money market and certificate of deposit accounts online. Business related products and services include

checking, savings, business money market accounts, treasury management services, cash management services, remote deposit capture, and online banking.

As of our evaluation, FFL had two AAs in Ohio, which are contiguous. The bank's primary AA is identified as the Cleveland AA, which includes the entire Cleveland-Elyria, OH Metropolitan Statistical Area (MSA). In October 2019, the bank consolidated its three loan production offices in Columbus, Ohio into a new full-service branch located in Dublin, Ohio. This created a new AA, identified as the Columbus AA, which consists of the counties of Franklin, Licking, Union, Fairfield, and Delaware, and is part of the Columbus, OH MSA. The bank also operates ten loan production offices throughout Ohio.

There are no legal, financial, or other factors impeding FFL's ability to help meet the credit needs of the AAs. The bank received a "Satisfactory" rating on their previous CRA performance evaluation dated January 26, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses FFL's record of meeting the credit needs of its AAs. We performed a full-scope review using Large Bank CRA examination procedures, which includes a lending test and a CD test. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AA through its home mortgage, small business, and CD lending activities. The CD test evaluates the bank's responsiveness to CD needs in the AA, through qualified investments, donations, and services. The evaluation period for lending and CD activities covers January 1, 2017 through December 31, 2020.

We evaluated FFL's lending performance based on its primary loan products, which include home mortgage loans and small loans to businesses. While the bank offers multifamily, home equity, and consumer installment loans, these products are not a primary focus for the bank. As a result, we did not consider these as part of our evaluation, as an analysis of this data would not be meaningful. However, we did consider any multi-family loans that qualify as CD loans as part of our CD lending assessment.

Prior to the examination, we tested the accuracy of the bank's reported Home Mortgage Disclosure Act and small business loan data. We determined the information to be accurate.

Selection of Areas for Full-Scope Review

We selected the bank's Cleveland AA for a full-scope review, as it has a majority of the bank's deposits and branch offices. We completed a limited-scope review of the Columbus AA, as this represents the bank's smallest market based upon loan originations, its single branch holds and services 0.5 percent of the bank's total deposits, and the bank operated in this AA for only 14 months of the evaluation period. Please refer to *Appendix A, Scope of Examination*, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on its lending and CD performance within the state of Ohio. The state rating is based on performance in the bank's AAs that received full-scope reviews. Therefore, we gave more consideration to the bank's performance within the Cleveland AA when determining the overall state rating as this represented the bank's largest market with the most predominant deposit concentrations, lending activity, and branch distribution. Refer to the "Scope" paragraph within the "State" section of this document for details regarding how the areas were weighted in arriving at the respective ratings. We based our conclusions for the Lending Test on loan products weighted in according to their relative volume. As

a result, more weight was given to home mortgage activity than small loans to businesses.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Ohio

CRA rating for the State of Ohio:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Lending activity reflects excellent responsiveness to credit needs in the bank's AA.
- The bank's geographic distribution of home mortgage loans and small loans to businesses within its AA is good.
- The bank's distribution of home mortgage loans among individuals of different income levels and small loans to businesses is adequate.
- The bank uses innovative and/or flexible lending practices to address the credit needs of the AA and showed excellent responsiveness to the credit needs of its borrowers during the COVID-19 pandemic.
- The bank's CD investments represent an adequate responsiveness to credit and community development needs.
- The bank's CD services represent excellent responsiveness to AA needs.
- The bank's products and service delivery systems are accessible to geographies and individuals of different income levels in its AA.

Description of Institution's Operations in Ohio

As of our evaluation, FFL operated 20 branch offices throughout its two AAs. Nineteen branch offices are located in the Cleveland AA, which includes the main office and holding company location. The bank also has one branch located within the Columbus AA. During the evaluation period, the bank opened one branch in the Cleveland AA as well as one branch in the Columbus AA. FFL also operates ten loan production offices in the state.

All branch offices are open relatively the same hours and days. Each office offers access to deposit-taking ATMs and 18 of the 20 offices provide drive-through services. All branches, except one, have night depository capabilities. The bank also operated eight stand-alone, co-branded, cash dispensing-only ATMs located within a local drug store chain through December 31, 2019. FFL is a member of the MoneyPass ATM network, which provides surcharge free access to over 37,000 ATMs.

Cleveland AA

Demographic Information of the Assessment Area						
Assessment Area: Lakewood - Cleveland AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	638	18.5	23.0	32.1	24.5	1.9
Population by Geography	2,064,483	12.1	20.0	34.3	33.2	0.4
Housing Units by Geography	956,125	14.1	22.4	33.4	29.4	0.6
Owner-Occupied Units by Geography	552,981	6.5	16.2	37.9	39.2	0.2
Occupied Rental Units by Geography	294,627	22.5	31.0	29.2	16.0	1.2
Vacant Units by Geography	108,517	30.1	30.6	22.4	15.7	1.3
Businesses by Geography	150,156	8.2	16.2	33.0	41.9	0.8
Farms by Geography	3,794	3.7	11.6	40.1	44.5	0.1
Family Distribution by Income Level	521,209	22.8	16.7	19.3	41.2	0.0
Household Distribution by Income Level	847,608	25.9	15.3	16.6	42.2	0.0
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Median Housing Value			\$138,565
			Median Gross Rent			\$761
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS and 2019 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Cleveland AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income census tracts (CTs). Cleveland is FFL's primary AA and includes the entire Cleveland-Elyria, OH MSA. The MSA includes Cuyahoga, Geauga, Lake, Lorain, and Medina counties. The area offers a combination of both urban and suburban neighborhoods, as well as rural areas and is located in northeastern Ohio along Lake Erie. Cleveland is the primary city within the AA and contains most of the AA's low- and moderate- income CTs. The bank operates its main office within Cuyahoga County, in the city of Lakewood. Based on 2015 American Community Survey (ACS) data, the AA consists of 638 CTs and includes 118 low-income, 147 moderate-income, 205 middle-income, and 156 upper-income CTs. Twelve CTs do not have an income designation.

The AA is highly competitive, with a mixture of community banks and large banks serving the area. Per the June 30, 2020, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, 36 institutions operate in the AA, maintaining 601 offices. This does not include credit unions or other financial services providers. FFL ranked 11th in terms of deposit market share, with 1.6 percent, or \$1.6 billion of insured deposits. The largest competitors for deposits include Huntington National Bank, KeyBank, PNC Bank, Citizens Bank, and Third Federal Savings and Loan Association, which hold a combined 73.8 percent of the deposit market. Overall, 99.5 percent of the bank's total deposits are located in the Cleveland AA.

Significant competition for loans exists in the AA. Based on 2019 peer mortgage loan data, FFL ranked 13th out of 568 lenders originating home mortgage loans within the AA, with a 2.2 percent market share. The top five business lenders are large banks, which account for 33.8 percent of business lending in the AA. According to 2019 peer small business data, FFL ranked 21st out of 132 lenders originating business loans in the AA, with a 0.4 percent market share.

A majority of non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2020 Dun & Bradstreet (D&B) data, 83.9 percent of businesses located in the AA have less than \$1 million in gross annual revenues and 63.1 percent of businesses have fewer than five employees. Only 2.3 percent of businesses are headquartered in the AA, while 88.9 percent operate from a single location. Major employers in the AA include the Cleveland Clinic, University Health Systems, U.S. Office of Personnel Management, Cuyahoga County, and Progressive Corporation.

Economic conditions in the AA prior to the COVID-19 pandemic mirrored the state of Ohio. The unemployment level at the beginning of 2017 for the AA was 6.8 percent, decreasing to 3.8 percent as of year-end 2019. In comparison, the Ohio unemployment rate declined from 6.2 percent in the beginning of 2017 to 3.9 percent at the end of 2019. The AA was significantly impacted by the COVID-19-pandemic. At its peak, the AA's unemployment rate was 21.8 percent, and remained over 12.0 percent for three months in 2020. As of December 31, 2020, the AAs unemployment rate of 7.6 percent significantly exceeded the state of Ohio rate of 5.3 percent. Per Moody's Analytics, a tentative economic recovery is beginning in the AA. According to Moody's proprietary COVID-19 indicator calculation, Cleveland ranks in the bottom quartile of areas for exposure to the virus as the AA is far less exposed to tourism than most.

The OCC also reviewed information provided by three community contacts, which are non-profit organizations specializing in block-level residential development and revitalization of neighborhoods through housing outreach programs including homeownership training, financial literacy, and energy and emergency assistance. One organization also provides services to low- and moderate-income families, including the Headstart program, computer classes, and youth services. There is a high level of competition in the AA from larger banks, such as PNC and Huntington, to participate, lend, or invest in CD activities. The contacts provided numerous opportunities for bank involvement. These opportunities include funding for financial education and general operating support. There is also a need for credit and account opportunities for small business and small dollar loans, affordable housing purchase and rehabilitation loans, home maintenance, and secured and unsecured credit cards and accounts for the unbanked. Opportunities also exist for participation on boards and committees. Two contacts noted that FFL was a strong supporter of their organizations and that FFL employees serve on their boards of directors.

Scope of Evaluation in Ohio

We selected the bank's Cleveland AA for a full-scope review. Refer to *Appendix A* for additional information.

We evaluated FFL's performance in the state of Ohio by analyzing the bank's lending performance and its CD lending, investment, and service performance from January 1, 2017, through December 31, 2020. We gave more consideration to the bank's performance within the Cleveland AA based upon the number of branch offices and total deposits serviced, when determining the overall state rating. Additionally, Cleveland is the bank's primary AA and where the bank is headquartered. We completed a limited scope review of the Columbus AA, as this represents the bank's smallest market based on loans originated and includes one branch that holds and services only 0.5 percent of total deposits.

The procedures used to assess FFL's lending performance focused on the bank's primary lending products. Based on the bank's strategic plan, reports of lending activities over the review period, Reports of Condition and Income, and discussions with senior management, we determined the bank's primary areas of lending focus to be home mortgage and business loans. Aggregate home mortgage and small business data for 2020 was not available during this evaluation. Therefore, we compared the bank's lending performance to 2017 through 2019 demographic and aggregate data. The Office of Management and

Budget (OMB) instituted changes to some MSA delineations that took effect January 1, 2019. The bank's AAs were not impacted by the OMB changes, allowing 2017 through 2020 data to be combined for analysis.

We also utilized other supporting information while evaluating FFL's CRA performance. Additional supporting information included 2015 ACS data, 2017 through 2020 bank loan data, internal bank records, FDIC deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AAs. We also considered information from community contacts to help assess the needs of the bank's AAs and the opportunities for financial institutions to lend and provide services within those areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

The bank's performance under the Lending Test in Ohio is High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's lending performance in their AA is good.

Lending Activity

Lending activity reflects excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope							
Cleveland	8,023	440	0	10	8,473	91.4	99.5
Limited-Scope							
Columbus	780	20	0	0	800	8.6	0.5
TOTAL	8,803	460	0	10	9,273	100.0	100.0

Dollar Volume of Loans (000) *							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State*	% State Deposits
Full-Scope							
Cleveland	\$1,629,799	\$71,765	0	\$4,592	\$1,706,156	86.6	99.5
Limited-Scope							
Columbus	\$257,806	\$6,168	0	0	\$263,974	13.4	0.5
TOTAL	\$1,887,605	\$77,933	0	\$4,592	\$1,970,130	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Refer to lending volume tables above for the facts and data used to evaluate the bank's lending activity.

FFL's volume of lending activity is excellent in the state of Ohio. In drawing our overall conclusion, we considered the bank's operations which are focused on home mortgage and business lending. We also considered the bank's market presence and competition within the AA.

Cleveland AA

Lending levels in the Cleveland AA reflect excellent responsiveness to the AAs credit needs. During the evaluation period, the bank originated 8,023 home loans totaling \$1.6 billion and 440 small business loans totaling \$71.8 million. Based on the FDIC Market Share report from June 30, 2020, there were 36 deposit-taking institutions with one or more banking offices in the AA. FFL ranked 11th with a deposit market share of 1.6 percent.

Given that there are considerably more lenders originating or purchasing loans in the AA than there are depository institutions with branch offices, FFL's lending market share is excellent compared to its deposit market share in the AA. Peer home mortgage data for 2019 indicates FFL ranked 13th among 568 lenders that reported home mortgage loans with a market share of 2.2 percent. This is the equivalent to the top two percent of lenders in the AA. Peer business lending data for 2019 shows FFL ranked 21st among 132 lenders who reported business loans with a market share of 0.4 percent. This is the equivalent to the top 16.0 percent of reporting lenders in the AA.

Distribution of Loans by Income Level of the Geography

FFL exhibits good geographic distribution of loans throughout its AA.

Home Mortgage Loans

Refer to Table O in the state of Ohio section of *Appendix D* for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

In determining our ratings, we weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from larger institutions, the number of low- and moderate-income CTs, branch presence, area demographics, and the location of the majority of owner-occupied housing. We also considered the bank's rank in market share within low- and moderate-income CTs.

Cleveland AA

The overall geographic distribution of home mortgage loans in the Cleveland AA is good.

In our analysis, we considered that better lending opportunities exist in upper- and middle-income CTs within the AA. According to the 2015 ACS, those CTs contained 77.1 percent of owner-occupied housing units in the AA. Additionally, the percentage of renter-occupied housing units in low- and moderate-income CTs is 49.2 percent and 42.6 percent, respectively. Vacant housing units account for 24.2 percent of units in low-income CTs and 15.5 percent of units in moderate-income CTs. While single family homes comprise 79.0 percent and 72.6 percent of housing units in low- and moderate-income CTs, respectively, only 26.6 percent in low-income CTs and 41.9 percent in moderate-income CTs are owner-occupied.

The bank's percentage of home mortgage loans in low-income CTs in the AA was 3.2 percent. This is slightly below the 6.5 percent of owner-occupied housing units in low income geographies but exceeds the aggregate home mortgage lending percentage of 3.0 percent. The proportion of the bank's home mortgage lending in moderate-income CTs at 8.9 percent is below both the owner-occupied housing unit percentage of 16.2 percent, and the aggregate home mortgage lending percentage of 12.3 percent.

FFL's rank and market share for lending in low-income CTs was good in 2018 and 2019. Based on 2018 aggregate data, the bank ranked 13th out of 231 lenders with a 2.1 percent market share in low-income

CTs. The bank improved in 2019, ranking 12th out of 243 lenders with 2.2 percent of the market. FFL's rank and market share for lending in moderate-income CTs was also good in 2018 and 2019. In 2018, the bank ranked 13th out of 337 lenders with 1.7 percent market share in moderate-income CTs. FFL's market share ranking in 2019 was 13th out of 341 lenders at 1.9 percent of the market. These rankings correspond to the top five percent of reporting lenders in the AA, demonstrating the bank is actively lending within low- and moderate-income CTs.

Small Loans to Businesses

Refer to Table Q in the state of Ohio section of *Appendix D* for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

In determining our conclusions, we gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of non-farm businesses located in low- and moderate-income CTs within the AA.

Cleveland AA

FFL's distribution of small loans to businesses in low- and moderate-income geographies is good. In our analysis, we considered that better lending opportunities exist in upper- and middle-income CTs within the AA. According to 2020 D&B data, those CTs contained 74.9 percent of all businesses in the AA.

The bank's proportion of small business loans at 7.0 percent in low-income CTs is very near both the percentage of businesses and percentage of aggregate small business lending at 8.4 percent and 7.4 percent, respectively. The proportion of the bank's small loans to businesses in moderate-income CTs at 14.1 percent is also near both the percentage of businesses at 16.7 percent and aggregate percentage of lending to small businesses at 15.3 percent.

Lending Gap Analysis

We reviewed summary reports and maps, and analyzed FFL's home mortgage lending over the evaluation period to identify any gaps in the geographic distribution of loan activity. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the products offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Ohio section of *Appendix D* for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the level of competition and its effect on limiting the bank's ability to lend to borrowers of different incomes, as well as the economic conditions in the AA. We also considered the percentage of families that live below the poverty level, and the barriers this creates for these families to qualify for home mortgage financing.

Cleveland AA

The bank's overall borrower distribution of home mortgage loans among borrowers of different income levels throughout the Cleveland AA is adequate.

The proportion of home mortgage loans to low-income borrowers at 4.6 percent is below aggregate bank lending at 8.1 percent. Though the bank's percentage of home mortgage loans is below the 22.8 percent of low-income families in the AA, the bank's level of lending is reasonable given that 11.6 percent of the families in the AA are considered living below poverty. The proportion of the bank's home mortgage loans to moderate-income borrowers at 16.5 percent is comparable to the percentage of families in the AA at 16.7 percent and near the aggregate lending at 19.1 percent.

Additionally, the bank's overall rank and market share for lending to low- and moderate-income borrowers is good. Based on 2018 aggregate data, the bank ranked 20th out of 246 lenders with a 1.1 percent market share to low-income borrowers, and 15th out of 302 lenders with a 1.9 percent market share to moderate-income borrowers. Similarly, in 2019, the bank ranked 18th out of 263 lenders with a 1.1 percent market share to low-income borrowers, and 14th out of 348 lenders with a 1.2 percent market share to moderate-income borrowers. The 2019 rankings place the bank in the top seven percent of lenders to low-income borrowers and the top four percent of lenders to moderate-income borrowers.

Small Loans to Businesses

The bank's borrower distribution of small loans to businesses of different sizes is good.

Refer to Table R in *Appendix D* for the facts and data used to evaluate FFL's distribution of small loans to businesses. In evaluating the borrower distribution of loans to businesses of different sizes, we considered the level of competition and its effect on limiting the bank's ability to lend, as well as the economic conditions in the AA.

Cleveland AA

The borrower distribution of the bank's small loans to small businesses in the Cleveland AA is good. FFL's percentage of small loans to small businesses at 63.2 percent is below the percentage of small businesses in the AA that report revenues of \$1 million or less at 83.9 percent. However, the bank's percentage of small loans to small businesses significantly exceeds the aggregate percentage of small loans to small businesses of 47.6 percent.

Community Development Lending

During the evaluation period, FFL made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

FFL originated 10 qualifying CD loans totaling \$4.6 million. When drawing our conclusions, we considered the level of competition for CD loans within the bank's AA from larger financial institutions and the overall economic conditions impacting the bank's ability to generate CD loans. Below are the details regarding the bank's CD loans.

- Five loans totaling \$2.1 million for the construction or rehabilitation of multi-family affordable housing units located in low- or moderate-income CTs.
- A \$1.6 million PPP loan to a non-profit food bank located in a low-income CT.
- A \$280,000 loan to a non-profit organization in a low-income CT that offers long-term, structured living and education for women seeking recovery from drug and alcohol addiction.
- A \$250,000 loan to a non-profit organization in a low-income CT that provides affordable housing ownership opportunities to low- and moderate-income individuals.
- Two economic development loans totaling \$231,000 for the construction of a small business grocery store located in a moderate-income CT that provides shopping and employment opportunities for neighborhood residents.

Product Innovation and Flexibility

The institution uses innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- or moderate-income individuals or geographies. FFL offered several innovative or flexible loan programs that focused on making home ownership affordable and promoting small businesses, which had a positive impact on the bank's lending performance in the state of Ohio.

The bank participates in several Federal Home Loan Bank (FHLB) programs that facilitate affordable housing opportunities by offering funding assistance to homebuyers. These programs include the Affordable Housing Program and the Affordable Housing Grant. FFL is the member bank-partner with Greater Cleveland Habitat that administers all home loans associated with FHLB's Affordable Housing Grant. The bank similarly utilizes grant funds offered through the FHLB Welcome Home Loan program. Additionally, the bank provides several Fannie Mae (FNMA) and Freddie Mac (FHLMC) loans options, including FNMA's HomeReady and FHLMC's Home Possible loans, which provide for a lower down payment, lower credit scores, and flexible sources of down payments. The bank also offers small business loans in partnership with the SBA.

COVID-19 Pandemic Relief

FFL showed excellent responsiveness to the credit needs of its borrowers during the COVID-19 pandemic in 2020 by providing loan modification opportunities such as extensions and deferrals and participating in the SBA's PPP program. FFL originated 1,281 PPP loans totaling \$105.9 million. The bank also provided in-house Emergency Relief loans to small businesses in Lakewood and Cleveland's Ward 7 and surrounding neighborhoods to assist small businesses that were negatively impacted by the pandemic. FFL originated 55 of these loans, totaling \$187,500. Interest on the loans was deferred until January 2021 and no fees or liens were required.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Columbus AA is weaker than the bank's overall performance under the Lending Test in the full-scope area due to poor distribution of home mortgage and small business loans and the lack of CD lending in the AA. Due to the recent addition of the AA, limited branch presence, the level of competition for lending opportunities, and the percentage of the bank's deposits in the AA, performance in the limited-scope area did not materially impact the bank's overall Lending Test rating.

Refer to Tables O, P, Q, and R in the state of Ohio section of *Appendix D* for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Ohio is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's overall performance in the Cleveland AA is adequate.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review										
Cleveland	1	97	27	480	28	82.4	577	8.0	0	0
Statewide/Regional with Direct Benefit to AAs	6	6,662	0	0	6	17.6	6,662	92.0	0	0
Limited Review										
Columbus	0	0	0	0	0	0	0	0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. This table includes all CD investments, including prior period investments that remain outstanding as of our performance evaluation period.

FFL made a total of 34 qualifying investments and donations, including seven prior period investments, totaling \$7.2 million. This equates to 3.3 percent of Tier 1 capital as of December 31, 2020.

Cleveland AA

FFL displayed adequate responsiveness to the CD needs of the AA when giving consideration for prior period statewide or regional CD investments still outstanding. Current and prior period investments consist of the following:

- While FFL did not make any CD investments that directly benefited the AA during the evaluation period, as noted above, the bank did have six prior period Low-Income Housing Tax Credit (LIHTC) investments with an outstanding balance of approximately \$6.7 million as of December 31, 2020, which benefited the Cleveland AA. Additionally, there is a prior-period investment in a mortgage-backed security with a current value of \$96,800. Collateral for the underlying loans is single-family homes for low- and moderate-income individuals within the bank's AA. These investments helped address the affordable housing needs of the community.
- Financial grants and in-kind donations totaling \$479,500 to 27 local community organizations for CD initiatives including affordable housing, social services for low- and moderate-income individuals, and neighborhood revitalization.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Columbus AA is weaker than the bank's overall performance under the Investment Test in the Cleveland AA, resulting from a lack of qualified investments made within the AA. Due to the recent addition of the AA, limited branch presence, the level of competition for CD investments opportunities, and the percentage of the bank's deposits in the AA, performance in the limited-scope area did not materially impact the bank's overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in Ohio is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Cleveland AA is excellent.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
		# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
	Low			Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full-Scope											
Cleveland	99.5	19	95.0	0.00	15.8	26.3	52.6	12.1	20.0	34.3	33.2
Limited Scope											
Columbus	0.5	1	5.0	0.00	0.0	100.0	0.0	0.0	19.6	51.3	29.3

Branch opening(s) during the review period. See Distribution of Branch Openings/Closings table for details. Data within table is based on the FDIC's Deposit Market Share Report as of June 30, 2020. One CT in the Cleveland AA does not have an income level per the Federal Financial Institutions Examination Council's (FFIEC) geocoding system and was not included in this table.

Cleveland AA

FFL's branches are accessible to geographies and individuals of different income levels in the Cleveland AA. Overall, systems for delivering retail banking services are good. As shown in the table above, the bank operates 19 branch offices in the AA. Although the bank did not have any offices located within the 118 low-income CTs in the AA, the bank did have three offices located in moderate-income CTs which are adjacent to, or near to, a number of low- and moderate-income CTs. There are also two branches, one located in a middle-income geography and another in an upper-income geography that are near several additional low- and moderate-income CTs. Additionally, the percentage of offices located in moderate-income CTs is almost equal to the percentage of the AAs population that lives in those CTs. The bank opened one branch in the Cleveland AA during the evaluation period. Branch hours, and the level of services available, do not vary in ways that inconvenience any portion of the AA, including low- and moderate-income individuals. In addition, each office offers access to deposit-taking ATMs. Other alternative delivery systems include online, mobile, and internet banking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Moderate	Middle	Upper	N/A*
Full-Scope							
Cleveland	1	0	0	0	0	0	+1
Limited-Scope							
Columbus	1	0	0	0	+1	0	0

* N/A – CT income level not designated.

FFL's opening of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate income CTs and/or to low- and moderate-income individuals. Services and business hours do not vary in a way that inconveniences the various portions of its AAs, particularly low- and moderate-income geographies and/or individuals.

Community Development Services

The bank provides a significant of level of CD services.

Cleveland AA

FFL demonstrated an excellent level of responsiveness to community needs by providing a variety of CD services through financial and technical expertise to non-profit groups involved in affordable housing, social services for low- or moderate-income individuals, financial literacy, and economic development. Bank officers and staff participated with twenty-three organizations within the AA through the following activities:

- Ten employees serve on the board of directors of organizations focused on affordable housing, and general social services for low- and moderate-income individuals, including distribution of assets to charities, providing assistance with utility bills, rent, auto repairs and home repairs, a food pantry in a low-income area, and providing basic services to the homeless.
- One employee serves as the treasurer of an organization, while one other employee participates on a finance committee.
- Two employees serve on a housing committee and one serves on the loan committee for several affordable housing organizations.
- Eleven employees taught financial literacy programs for low- to moderate-income adults and children.
- The bank also provides on-site banking services for a low- and moderate-income senior housing facility.

Additionally, employees participated in other non-qualifying volunteer, outreach, and fundraising service activities that benefitted low- and moderate-income individuals and non-profit organizations located within the bank's AA.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Columbus AA is weaker than the bank's overall performance under the Service Test in the Cleveland AA, due to a lack of qualified CD services within the AA. Due to the recent addition of the AA, limited branch presence, the level of competition for CD service opportunities, and the percentage of the bank's deposits in the AA, performance in the limited-scope area did not materially impact the bank's overall Service Test rating.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	Lending Test: 1/1/2017 to 12/31/2020 Investment Test and Service Test: 1/1/2017 to 12/31/2020	
Bank Products Reviewed:	Home mortgage loans, business loans, community development loans, qualified investments, and community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State(s)		
<u>State of Ohio</u> Cleveland AA	Full-scope	Cleveland-Elyria MSA
Columbus AA	Limited-scope	Portions of the Columbus MSA (Franklin, Licking, Union, Fairfield, and Delaware counties)

Appendix B: Summary of State Ratings

RATINGS: First Federal Savings and Loan of Lakewood				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank Rating
	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
State:				
Ohio	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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 under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment

center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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.

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

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Ohio Lending

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2020		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope																					
Cleveland	8,023	1,629,799	91.1	72,345	6.5	3.2	3.0	16.2	8.9	12.3	37.9	33.4	37.9	39.2	54.4	46.8	0.2	0.0	0.0		
Limited Scope																					
Columbus	780	257,806	8.9	81,793	5.4	1.4	4.7	17.9	4.6	15.5	34.1	26.7	32.3	42.6	66.9	47.4	0.0	0.4	0.0		
Total	8,803	1,887,605	100	154,138	6.0	2.9	3.9	17.0	8.3	14.0	36.3	32.3	34.9	40.7	56.4	47.1	0.1	0.0	0.0		
Source: 2015 ACS Census; 01/01/2017 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-2020	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope																				
Cleveland	8,023	1,629,799	91.1	72,345	22.8	4.6	8.1	16.7	16.5	19.1	19.3	23.0	22.0	41.2	55.0	36.6	0.0	0.9	14.3	
Limited Scope																				
Columbus	780	257,806	8.9	81,793	21.9	1.0	6.7	16.7	8.7	17.5	19.2	13.7	20.3	42.1	76.3	40.2	0.0	0.3	15.3	
Total	8,803	1,887,605	100	154,138	22.4	4.1	7.3	16.7	15.1	18.3	19.3	21.3	21.0	41.6	58.2	38.5	0.0	0.8	14.8	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2020		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope																					
Cleveland	440	71,765	95.7	40,626	8.4	7.0	7.4	16.7	14.1	15.3	32.9	31.8	31.2	41.2	46.1	45.4	0.9	0.9	0.7		
Limited Scope																					
Columbus	20	6,168	4.3	36,393	9.6	0.0	13.1	17.3	10.0	14.8	28.7	45.0	26.1	44.0	45.0	45.7	0.5	0.0	0.3		
Total	460	77,933	100.0	77,019	8.9	6.7	10.1	17.0	13.9	15.0	30.9	32.5	28.8	42.5	46.0	45.5	0.7	0.9	0.5		
<i>Source: 2020 D&B Data; 01/01/2017 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2020	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Full-Scope												
Cleveland	440	71,765	95.7	40,626	83.9	63.2	47.6	6.3	27.7	9.8	9.1	
Limited Scope												
Columbus	20	6,168	4.3	36,393	84.0	45.0	46.6	5.1	5.0	10.8	50.0	
Total	460	77,933	100.0	77,019	83.9	62.1	47.1	5.8	27.1	10.3	10.8	
<i>Source: 2020 D&B Data; 01/01/2017 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												