



PUBLIC DISCLOSURE

March 20, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Home Federal Savings and Loan Association of Niles
701412

55 N. Main Street
Niles, OH 44446-5003

Office of the Comptroller of the Currency
Northern Ohio Office
200 Public Square Suite 1610
Cleveland, OH 44114-2301

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 lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the reasonable distribution of home mortgage loans among borrowers of different incomes and a reasonable geographic distribution of home mortgages.
- A majority of the bank’s loans are inside its assessment area (AA).
- The bank’s loan-to-deposit (LTD) ratio is more than reasonable.

Loan-to-Deposit Ratio

Considering Home Federal Savings and Loan Association of Niles’s (HFSL or bank) size, financial condition, and credit needs of the AA, the bank’s LTD ratio is more than reasonable.

HFSL’s LTD ratio is calculated on a bank-wide basis and meets the standard for satisfactory performance. The Office of the Comptroller of the Currency (OCC) evaluated the bank’s quarterly LTD ratios for the evaluation period January 1, 2019, to December 31, 2021. The bank’s average LTD ratio during the evaluation period was 101.67 percent, with quarterly ratios ranging from 77.03 percent in the first quarter of 2019, to 119.91 percent in the second quarter of 2020. There were no other similarly situated financial institutions in the AA.

Lending in Assessment Area

A majority of the bank’s loans are inside its AA.

HFSL originated and purchased 56.8 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - 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		
	#	%	#	%		\$	%	\$	%	
Total	42	56.8	32	43.2	74	3,323	43.9	4,254	56.1	7577

*Source: Bank data
Due to rounding, totals may not equal 100.0%*

Description of Institution

HFSL is a federally chartered institution headquartered in Niles, Ohio. It is a full-service intrastate bank and a wholly owned subsidiary of First Niles Financial Inc., a one bank holding company located in Niles,

Ohio. The bank's operations are focused within a portion of Trumbull County. The Trumbull AA contains 40 census tracts (CTs) and it is part of the Youngstown-Warren-Boardman OH-PA Metropolitan Statistical Area (MSA). The bank did not open or close any branches during the evaluation period. The bank operates a single branch with drive-up service in a middle-income CT in Trumbull County. The bank does not have any automatic teller machines (ATM). The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income CTs. As of December 31, 2021, the bank's assets totaled \$124.3 million, and tier one capital totaled \$13.1 million, or 10.5 percent of total assets.

The bank's primary loan products are residential real estate loans. During the evaluation period, the bank's loan portfolio increased by 77.4 percent to \$78.4 million. As of December 31, 2021, the loan portfolio was comprised of residential real estate loans (\$48.9 million or 62.3 percent), non-farm or non-residential loans (\$9.8 million or 12.4 percent), construction loans (\$8.5 million or 10.8 percent), multi-family loans (\$8.0 million or 10.2 percent), commercial and industrial loans (\$3.3 million or 4.2 percent), and consumer loans (\$82,000 or 0.1 percent).

Based on Federal Deposit Insurance Corporation (FDIC) Deposit Market Share reports from June 30, 2018, and June 30, 2021, deposits at the bank have increased from \$59 million to \$76 million.

HFSL offers traditional home loan products, including home mortgage loans, home improvement loans, and home equity lines of credit (HELOCs). The bank also offers consumer loans. The bank's consumer deposit-related products and services include checking, savings, and money market accounts, certificates of deposit, individual retirement accounts (IRA), online banking and bill pay, safe deposit boxes, night depository, debit, and ATM cards. Business-related deposit products and services include checking and savings accounts, certificates of deposit, business online banking. The bank offers commercial loans and commercial lines of credit.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the AA. The bank received a "Satisfactory" rating on their previous CRA performance evaluation dated November 20, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses HFLS's record of meeting the credit needs of its AA. Examiners performed a full-scope review using Small Bank CRA procedures, which includes the lending test using a sample of home mortgage loans. The evaluation period for the lending test covers January 1, 2019, to December 31, 2021. The bank is not a Home Mortgage Disclosure Act (HMDA) reporter.

Based on the bank's internal reports and discussions with management, examiners determined that the bank's primary lending product during the evaluation period was home mortgages loans. Examiners used other supporting information during the performance evaluation, including the 2015 American Community Survey (ACS) data, internal bank records, deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AA. Examiners also considered information from a community contact to help assess the needs of the bank's AA.

Selection of Areas for Full-Scope Review

HFSL has one AA, Trumbull AA, part of the Youngstown-Warren-Boardman OH-PA MSA. Examiners performed a full-scope review of the AA. Refer to *Appendix A: Scope of Examination*, for more information.

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. 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 state of Ohio lending performance within the Trumbull-MSA AA. Examiners weighed information from the following performance criteria when analyzing the bank’s primary lending product: loan-to-deposit ratio, lending within the AA, lending to borrowers of different incomes and the geographic distribution of loans.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(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 AA 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 Consumer Financial Protection Bureau, 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 Ohio¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank distribution of home mortgage loans among individuals of different income levels is reasonable.
- The bank's geographic distribution of home mortgage loans is reasonable.
- A majority of the bank's loans are inside its AA.
- The bank's LTD ratio is more than reasonable.

Description of Institution's Operations in Ohio

As of December 31, 2021, HFSL had one AA within the state of Ohio, the Trumbull AA. The AA includes the partial county of Trumbull and does not arbitrarily exclude any low- or moderate-income CTs. During the evaluation period, the bank operated one full-service branch within the AA, the main office is in a moderate-income CT. The branch offers drive-thru services. The bank does not have any ATMs.

The AA consists of 40 CTs and complies with regulatory requirements. Based on 2020 U.S. Census data, there are three low-income CTs, ten moderate-income CTs, 22 middle-income CTs, and five upper-income CTs in the Trumbull AA.

Banking competition within the AA is high. According to the June 30, 2021, FDIC Deposit Market Share Report, there are eleven financial institutions with 50 offices serving Trumbull AA. The bank is ranked eighth in terms of deposit market share in the AA, with 2.11 percent of total deposits. The top five institutions in the June 2021 report have a market share of 82.57 percent and include The Huntington National Bank, JP Morgan Chase Bank National Association, The Farmers National Bank of Canfield, The Cortland Savings and Banking Company, and PNC Bank, National Association.

The largest cities in the AA are Warren, Niles, Girard, and Hubbard. Prominent industries include manufacturing, health care and social assistance, retail trade, educational services, and accommodations, and food services. Major employers include General Motors, Trumbull County Government, Valley Care Health System. As of December 31, 2021, the unemployment rate in the AA was 4.5 percent, which exceeded the state unemployment rate of 3.5 percent.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

As part of this performance evaluation, we considered information obtained from one community contact within the AA to gain an understanding of the community development needs and credit opportunities of the AA. The community organization focuses on providing affordable housing. The organization noted affordable rental units and housing, emergency home repair for low- and moderate-income clients as the greatest needs in the AA. Opportunities for participation includes bank representation on the board and loan review committee, in-kind support for their financial coaching, job training, Americorps or programs, constructions financing and lines of credit, rehab loans, general funding for operating support, home ownership counseling and financial education.

Trumbull AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Home FSLA of Niles _ Trumbull County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	7.5	25.0	55.0	12.5	0.0
Population by Geography	144,770	4.8	22.1	56.0	17.0	0.0
Housing Units by Geography	69,624	5.2	21.5	56.9	16.4	0.0
Owner-Occupied Units by Geography	42,202	3.1	17.0	60.0	19.9	0.0
Occupied Rental Units by Geography	20,232	7.5	28.2	54.8	9.5	0.0
Vacant Units by Geography	7,190	11.4	29.2	44.7	14.7	0.0
Businesses by Geography	8,476	3.4	20.9	49.3	26.5	0.0
Farms by Geography	235	2.1	15.7	65.1	17.0	0.0
Family Distribution by Income Level	38,084	23.2	19.0	20.4	37.4	0.0
Household Distribution by Income Level	62,434	26.5	16.3	18.1	39.1	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$55,174	Median Housing Value			\$86,802
			Median Gross Rent			\$621
			Families Below Poverty Level			15.8%
<i>Source: 2015 ACS and 2021 D&B data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Ohio

This analysis reflects a full-scope review of the Trumbull AA. To develop conclusions, examiners considered the number of home mortgage loans originated or purchased by the bank during the evaluation period. Examiners gave more weight to the distribution of loans to individuals of different income levels and the geographic distribution of home mortgage loans. Examiners also considered any factors affecting the bank's ability to lend in its AA during the evaluation period, such as demographic and market share information. Refer to *Appendix A – Scope of Examination*, for more information on this AA.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in Ohio.

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.

The bank's distribution of home mortgage loans among geographies of different income levels in the Trumbull AA, during the evaluation period is reasonable. The bank did not make any loans in low-income CTs during the evaluation period. The bank's percentage of home mortgage loans among moderate-income CTs in the AA was 9.5 percent. This was less than the 17.0 percent of the AAs owner-occupied housing units in moderate-income CTs and in line with the 9.6 percent of aggregate bank lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

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.

HFSL's distribution of home mortgage loans to borrowers of different income levels during the evaluation period in the Trumbull AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 4.8 percent. This is significantly below the 23.2 percent of low-income families living in the AA, and below the 8.7 percent aggregate bank lending level. The bank's percentage of home mortgage loans to moderate-income borrowers is 31.0 percent. It is significantly above the 19.0 percent of moderate-income families living in the AA, and above the 23.8 percent aggregate bank lending level.

Responses to Complaints

HFSL did not receive any complaints during the evaluation period that would affect its CRA rating.

Appendix A: Scope of Examination

The following table identifies the time 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:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	No affiliate products reviewed
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Trumbull AA	Full-Scope	40 CTs in Trumbull County. Part of the Youngstown-Warren-Boardman OH-PA MSA (49660)
States		
Ohio		

Appendix B: Summary of MMSA and State Ratings

RATINGS Home Federal Savings and Loan Association of Niles	
Overall Bank:	Lending Test Rating
Home Federal Savings and Loan Association of Niles	Satisfactory
State:	
Ohio	Satisfactory

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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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.

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 are treated 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.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000)

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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
Home FSLA of Niles_Trumbull County AA	42	3,323	100	5,096	3.1	0.0	0.4	17.0	9.5	9.6	60.0	64.3	67.5	19.9	26.2	22.5	0.0	0.0	0.0
Total	42	3,323	100	5,096	3.1	0.0	0.4	17.0	9.5	9.6	60.0	64.3	67.5	19.9	26.2	22.5	0.0	0.0	0.0

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 bank data, 2021 HMDA aggregate data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

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
Home FSLA of Niles_Trumbull County AA	42	3,323	100	5,096	23.2	4.8	8.7	19.0	31.0	23.8	20.5	16.7	22.3	37.4	31.0	27.3	0.0	16.7	17.9
Total	42	3,323	100	5,096	23.2	4.8	8.7	19.0	31.0	23.8	20.5	16.7	22.3	37.4	31.0	27.3	0.0	16.7	17.9

*Source: 2015 ACS ; 01/01/2019 - 12/31/2021 bank data, 2021 HMDA aggregate data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.