



PUBLIC DISCLOSURE

January 25, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Third Federal Savings and Loan Association of Cleveland
Charter Number: **704544**

7007 Broadway Ave
Cleveland, OH 44105-1441

Office of the Comptroller of the Currency

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 **Needs to Improve**.

The following table indicates the performance level of **Third Federal Savings and Loan Association of Cleveland** (Third Federal or “bank”) with respect to the lending, investment, and service tests:

Performance Levels	Third Federal Savings and Loan Association of Cleveland Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory		X	X
Needs to Improve	X		
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:

- Third Federal's overall volume of lending activity is good. In concluding on overall lending activity, we gave more consideration to the bank's excellent lending activity in the state of Ohio, and its level of lending activity in comparison to its deposit base and limited presence in each of its assessment areas (AAs) in the state of Florida.
- Third Federal's record of lending in low- and moderate-income geographies and to low- and moderate-income borrowers is weak, as the bank made relatively few loans to those segments of the community during the evaluation period. In drawing Lending Test conclusions, we considered that a fair portion of the credit needs of the low- and moderate-income segments of the community were addressed by the aggregate market through government-backed loan products that are not offered by Third Federal. Therefore, our analyses included comparing the bank's lending activity to the aggregate market's conventional lending activity, as well as the aggregate market's overall lending activity. We also considered the bank's loan modification activity, as many of its loan modifications were performed to address hardship needs of existing borrowers from low- and moderate-income segments of the community.
- Overall, Third Federal's qualified community development (CD) investment performance is adequate. The bank has an adequate record of making CD investments in Ohio, which is the bank's primary market.
- Third Federal's branch distribution is adequate in both Ohio and Florida. Products and services are reasonably accessible to all portions of the bank's AAs.
- CD service activity is adequate in Ohio and Florida.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/AA.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development (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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's AAs or outside the AAs provided the bank has adequately addressed the community development needs of its AAs.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-

couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and 1-4 family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/AA.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division (MD): As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area (MSA): 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, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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 One 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.

Description of Institution

Third Federal is a \$12.3 billion interstate federal savings association headquartered in Cleveland, Ohio. With a focus of originating and servicing home mortgages, the bank is a wholly-owned subsidiary of TFS Financial Corporation (TFS), a second-tier federally chartered stock holding company organized in Delaware and headquartered in Cleveland, Ohio. TFS is approximately 75 percent owned by Third Federal Savings and Loan Association of Cleveland, MHC and 25 percent by minority shareholders. Subsidiaries of Third Federal include FBE, Incorporated and Broadway Holding Company. The bank established FBE in 1999 to acquire properties in the area of Third Federal's headquarters for the purpose of long-term revitalization. Broadway Holding Company is the holding company for a real estate investment trust (REIT) known as Broadway Realty Holding Company. The REIT was formed in 2000 for the purpose of acquiring and holding the bank's loan production or related savings bonds. The Third Federal Foundation was created in 2007 to provide financial support to charitable organizations and community activities in the communities where the company operates. The foundation's activities enhance the bank's capacity for community investment.

As of June 30, 2015, Third Federal operated 21 branch offices in Ohio and 17 in Florida. According to June 30, 2015, Federal Deposit Insurance Corporation (FDIC) deposit data, the bank had \$6.07 billion in total deposits in Ohio and \$2.49 billion in Florida, respectively. With its home mortgage lending focus, the bank's branch network is limited compared to similar size commercial banks. It also operates eight loan production offices in central and southern Ohio, and originates first home mortgages and home equity loans throughout 19 additional states and the District of Columbia. Customers are served through the branch network, loan offices, online banking services, and telephone banking. While it offers debit cards, the bank does not own any automated teller machines (ATMs). As an alternative, it has contracted with a larger financial institution to provide its customers with limited non-deposit surcharge-free access to the larger bank's ATM system.

Third Federal's primary lending focus is conventional home mortgages. The bank does not offer government-backed home loans, and does not offer any business or commercial loan products. It retains most of the loans that it originates for its own portfolio, and services its loans as well. As of December 31, 2015, loans represented 91 percent of the bank's total assets. The composition of its loan portfolio was 87 percent 1-4 family closed end residential loans, 13 percent home equity lines of credit, and less than 1 percent combined for construction, multifamily, and other consumer loans. Third Federal had \$1.42 billion in Tier One capital as of December 31, 2015.

Third Federal did not acquire any financial institutions during the evaluation period. Branch activity was limited to office consolidations and relocations. No financial or legal impediments hindered the bank's ability to address community needs during the evaluation period. The bank's last CRA evaluation was performed as of January 17, 2012, and resulted in a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for this review is January 1, 2012, through December 31, 2015. We analyzed home mortgage lending data from January 1, 2012, through December 31, 2014. None of Third Federal's AAs were impacted by Office of Management and Budget's MSA delineation changes that took effect in January 2014, allowing the three years of data to be combined for the purpose of analysis. As the bank's operations are focused on home mortgage lending, there was no small loans to businesses and farms activity to analyze. We considered CD lending activity, qualified investments, branching activities, and CD services provided by the bank from January 1, 2012, through December 31, 2015. Qualified CD activities conducted by Third Federal Foundation during this same time period were also considered.

Data Integrity

The public information filed by Third Federal for home mortgage loans was tested for accuracy and found to be substantially correct. As the bank's loans are limited to home mortgages, it did not have any small loans to businesses and farms activity to report. We also reviewed CD loans, qualified investments, and CD services by the bank and Third Federal Foundation to ensure that they met the regulatory definition of CD. We found the information to be generally accurate, but some adjustments were needed. Our evaluation is based on qualified CD information.

Third Federal provided us with partial data on home mortgage modification activity it conducted during the evaluation period. Since the bank did not maintain full information for its modification database, such as loan amount and borrower income at time of modification, this data is not included within Table 1 as 'other product' information, and is not otherwise reflected in any of the tables in Appendix D. Regardless, we tested the modification data provided for accuracy to use in supplemental analyses. We confirmed that the data represents modification activity, but needed to adjust CT coding in some cases. Our supplemental analyses of loan modification data discussed within the Lending Test are based on accurate data.

Selection of Areas for Full-Scope Review

In each state where Third Federal has an office, a sample of AAs within that state was selected for full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were selected.

Ratings

Third Federal's overall rating is a blend of the Ohio and Florida state ratings, with performance in Ohio emphasized the most because a significant majority of the bank's deposits, reported loans, and qualified investments are from Ohio.

The state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were considered in arriving at overall state ratings.

When evaluating Third Federal's performance under the Lending Test, analyses used home mortgage lending and CD activity. The bank is not a small business or farm lender, and did not originate any of these loan types during the evaluation period. Within home mortgage activity, individual products were considered based on loan volume. Therefore, home refinance activity was given the greatest consideration, followed by home purchase activity. Home improvement activity was given the least consideration. The bank did not have any multifamily lending activity during the evaluation period. Equal consideration was generally given to the geographic and borrower distribution components of the Lending Test. When assessing geographic and borrower performance within AAs, the primary measure was comparing the bank's record of lending to the aggregate market's record of overall lending activity as well as the aggregate market's conventional lending activity.

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 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 provided concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Ohio

CRA Rating for Ohio:	<u>Needs to Improve</u>
The lending test is rated:	<u>Needs to Improve</u>
The investment test is rated:	<u>Low-satisfactory</u>
The service test is rated:	<u>Low-satisfactory</u>

The major factors that support this rating include:

- Third Federal's overall volume of lending activity in the state of Ohio is excellent.
- Third Federal's record of lending in low- and moderate-income geographies and to low- and moderate-income borrowers is weak, as few loans were made to those segments of the community during the evaluation period.
- Third Federal's qualified investment performance is adequate and is responsive to the CD needs of the AAs.
- Third Federal's branch distribution is adequate in Ohio. Products and services are reasonably accessible to essentially all portions of the bank's AAs, including the low- and moderate-income segments of the community.
- CD service activity is adequate in Ohio.

Description of Institution's Operations in Ohio

Ohio is Third Federal's most significant rating area, and it provides nearly 71 percent of the bank's deposits and nearly 74 percent of the loans reported by the bank within its AAs during the evaluation period. The bank and its holding company are headquartered in Cleveland, Ohio. The bank offers its full range of mortgage loans as well as deposit products and services in the state through a branch network that is limited compared to other depository institutions of similar and larger size operating in Ohio. The bank operates a branch network of 21 offices in northeast Ohio, and also operates eight loan production offices in central and southern Ohio. Lending products include residential home mortgage loans, as well as home equity loans and home equity lines of credit.

Third Federal is one of the larger insured financial institutions in the state. According to the FDIC's June 30, 2015, deposit market share data, the bank's statewide deposits totaled \$6.07 billion, which made the bank the ninth largest in the state with a 2 percent market share.

Third Federal has two Ohio AAs. The primary AA is located within the Cleveland-Elyria, OH MSA 17460 (Cleveland AA), with the second AA located within the Akron, OH MSA 10420 (Akron AA). The bank operates 18 offices in the Cleveland AA, with \$5.57 billion in deposits according to June 30, 2015, FDIC deposit data. This ranked the bank third out of 35 financial institutions, with a 9 percent share of the insured deposit market in the Cleveland AA. In the Akron AA, the bank has three offices with \$501 million in deposits, ranking the bank eighth out

of 27 financial institutions with a 4 percent market share. Please refer to the community profiles for the state of Ohio in Appendix C for detailed demographics and other performance context information for the Cleveland AA, which received a full-scope review. Refer to Appendix A for the detail of counties that comprise the limited-scope Akron AA.

Scope of Evaluation in Ohio

The Cleveland AA was selected for a full-scope review, as it represents Third Federal's most significant market in Ohio, and is where the bank is significant to the market in terms of offering banking services. The Cleveland AA provides nearly 92 percent of the bank's Ohio deposits, and nearly 85 percent of the total number of reported loans from Ohio AAs. The Akron AA was evaluated using limited-scope procedures, as it represents a small portion of the bank's operations in Ohio and is a market where the bank's presence is limited. The Akron AA is served by a variety of institutions, including several with higher deposit and lending levels than Third Federal. According to June 30, 2015, FDIC deposit data, the bank was ranked seventh out of 21 institutions in terms of deposits in the Akron AA, with a 4 percent share of the market. Please refer to Appendix A for additional information regarding which areas received full- and limited-scope reviews.

Ohio ratings are based primarily on conclusions reached for performance in the Cleveland AA, where we used full-scope procedures. In drawing conclusions relative to Third Federal's performance, we took into consideration community information obtained by the OCC and the bank, and we met with members of the local community. We contacted three organizations that focus on affordable housing, and one economic development organization. We also considered comments from other organizations that we met with collectively that focus on social services, economic development, and affordable housing. Refer to the community profiles in Appendix C for information including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Third Federal's performance under the Lending Test in Ohio is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Cleveland AA is weak.

Lending Activity

Refer to Table 1 - Lending Volume in the State of Ohio section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Third Federal's volume of lending activity is excellent in the Cleveland AA. In drawing our conclusions, we considered that the bank's operations are focused on home mortgage lending, with no business-related products offered. Based on overall mortgage loan volume, the bank's lending activity is commensurate with its local deposit presence, especially when considering the large number of lenders operating in the area. There are significantly more lenders operating in the area than there are depository institutions with branches. Many of the competing lenders are either non-depository institutions, or are depository institutions that do not operate branches in the AA.

The June 30, 2015, FDIC deposit market share data for the Cleveland AA reflects that Third Federal was ranked third in deposits among 35 depository institutions, with a 9 percent market share, while according to 2014 peer mortgage data the bank was the leading overall mortgage originator among nearly 400 lenders, with a 9 percent market share. The bank was ranked second in home refinance lending originations with a 13 percent market share, fourth in home purchase lending with a 7 percent market share, and sixth in home improvement lending with a 3 percent market share.

Distribution of Loans by Income Level of the Geography

Third Federal's geographic distribution of loans is weak. This conclusion is based on weak home mortgage lending performance in the Cleveland AA. The bank did not purchase any reportable loans during the evaluation period, and does not conduct any small business or farm lending.

Home Mortgage Loans

Third Federal's geographic distribution of home mortgage loans is weak. This conclusion is based on weak performance in the Cleveland AA. Refer to Tables 2a, 3a, and 4a in the Ohio section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan activity. In drawing overall geographic distribution conclusions, individual loan products were considered based on volume. Therefore, home refinance activity was given the greatest consideration, followed by home purchase activity and then home improvement activity. The bank did not originate or purchase any multifamily loans during the evaluation period.

Our analysis considered that Third Federal only offers conventional home mortgage loans, and does not offer government-backed loan products. Aggregate lending data for the overall market includes activity of lenders that also offer government-backed products such as Federal Housing Administration, Veteran's Administration, Farm Service Agency, and Rural Housing Services loans. Our analysis of aggregate lending data from the three-year evaluation period determined that a fair portion of the lending activity in the AA's low- and moderate-income CTs was addressed through loan types that the bank does not offer. Nearly 38 percent of the number of home purchase loans and 20 percent of the number of home refinance loans originated in the Cleveland AA's low-income CTs were government-backed loans. In moderate-income CTs, approximately 54 percent of home purchase loans and 23 percent of home refinance loans were government-backed loans. The aggregate activity within Appendix D tables reflects all types of lending activity. However, we also measured the bank's lending against the aggregate market's conventional lending activity in order to more closely compare the bank to the aggregate market using only bank-offered products. While government-backed loan products are available for home purchase and home refinance needs, they are generally not available for home improvement purposes. Therefore, our analyses of government-backed lending did not extend to home improvement loans.

We also considered loan modification activity that Third Federal provided, which is not included in the home mortgage lending data. During the evaluation period, 42 (9 percent) of the 443 loan modifications made by the bank in the Cleveland AA were in low-income CTs, and 99 loan modifications (22 percent) were in moderate-income CTs. Many of the loan modifications

were made to address hardship needs of existing borrowers, which addressed a credit need without generating a new reportable loan. Loan modifications were primarily alternatives to home refinance loans, as opposed to home purchase or home improvement loans. Therefore, we considered loan modification activity and impact when assessing home refinance performance.

Home Purchase Loans

The geographic distribution of home purchase loans is weak in the Cleveland AA when considering the degree to which aggregate lending data is impacted by government-backed loans. Table 2a in the Ohio section of Appendix D reflects very weak performance, with Third Federal's percentages of loans originated in both low-income and moderate-income CTs significantly below the percentages of lending performed by the aggregate market, and significantly below the percentages of the AA's owner-occupied housing units located in those respective CTs. However, when we measured the bank's performance against the aggregate market's conventional lending activity, the bank's performance is weak rather than very weak. Our conclusion reflected that the percentage of lending in low-income CTs remained significantly below the aggregate market, but approached weak performance levels. The percentage of lending in moderate-income CTs was well below the aggregate market's conventional activity levels, and represented weak performance.

Home Improvement Loans

The geographic distribution of home improvement loans is very weak in the Cleveland AA. The percentages of loans originated in both low-income and moderate-income CTs are significantly below the percentages of lending performed by the aggregate market, and are significantly below the percentages of the AA's owner-occupied housing units located in those respective CTs.

Home Refinance Loans

The geographic distribution of home refinance loans is weak in the Cleveland AA when considering all factors, including both the degree to which aggregate lending data is impacted by government-backed loans and Third Federal's modification activity. Table 4a in the Ohio section of Appendix D reflects very weak performance, with the bank's percentages of loans originated in both low-income and moderate-income CTs significantly below the percentages of lending performed by the aggregate market, and significantly below the percentages of the AA's owner-occupied housing units located in those respective CTs. However, when we measured the bank's performance against the aggregate market's conventional lending activity and considered the bank's loan modification activity, its performance is weak rather than very weak. Our conclusion reflected that the bank's lending performance improved when measured against the aggregate market's conventional loan activity, but that the percentage of the bank's lending in low-income CTs remained significantly below the aggregate market's. The bank's percentage of lending in moderate-income CTs was significantly below the aggregate market's conventional activity levels, but approached weak performance levels. The bank's lending record was positively impacted by its loan modification activity, which included 42 loans in low-income CTs and 99 loans in moderate-income CTs during the evaluation period.

Lending Gap Analysis

We analyzed Third Federal's home mortgage lending activity during the evaluation period to identify any gaps in its geographic distribution of loans. Our analysis considered the opportunity to lend as reflected by the number of owner-occupied housing units and conventional lending activity by the aggregate market.

We identified a gap in Third Federal's lending activity in an area comprised of portions of the City of Lorain and Sheffield Township, both of which are in Lorain County. No specific reason for the lack of Third Federal lending could be identified. The bank made no loans within an area comprised of nine contiguous CTs where there have been opportunities to lend. This area is comprised of low- and moderate-income CTs with nearly 4,500 owner-occupied housing units. The aggregate market made 344 conventional loans during the period of 2012 through 2014 in this area.

We also identified portions of the City of Cleveland where Third Federal lacked lending activity. The gaps in lending are comprised of areas with opportunities to lend intermixed with areas having limited opportunities to lend, as reflected by the number of owner-occupied housing units and the volume of conventional lending activity by the overall market. Nevertheless, the bank's penetration of the low- and moderate-income CTs in the overall Cleveland AA was very limited during the evaluation period. During the three-year period, the bank did not originate any loans in 78 of the AA's 104 low-income CTs and 47 of the AA's 134 moderate-income CTs. These CTs contain 67 percent of the owner-occupied housing units located in the AA's low-income CTs, and 24 percent of the owner-occupied housing units in the AA's moderate-income CTs. While portions of the areas had limited opportunities for making loans, the absence of Third Federal activity is noticeable, as the aggregate market originated more than 900 conventional loans in these low-income CTs and nearly 1,000 loans in these moderate-income CTs during the same three-year period. In contrast, the bank originated loans in each of the AA's 152 upper-income CTs, and originated loans in all but eight of the AA's 220 middle-income CTs.

The lack of lending in large portions of the low- and moderate-income CTs, and the gap identified in Lorain County, confirmed the bank's overall weak geographic distribution performance in the Cleveland AA.

Inside/Outside Ratio

A majority of the number of loans that Third Federal originated during the evaluation period were within the bank's AAs, while just under half of the dollar amount of loans was within the AAs. This is considered adequate, given the bank's multi-state lending operation and business strategy. Overall, 54 percent of the number of loans and 47 percent of dollar amount of loans were within the bank's AAs. For home purchase loans, 59 percent of the number of loans and 56 percent of the dollar amount of loans were within the AAs. For home improvement loans, 43 percent of the number of loans and 35 percent of the dollar amount of loans were within the AAs. For home refinance loans, 54 percent of the number of loans and 45 percent of the dollar amount of loans were within the AAs. These calculations are done on a bank-wide basis. This record of AA lending was considered to be a neutral factor when drawing conclusions relative to the overall geographic distribution of lending performance for the bank as a whole.

Distribution of Loans by Income Level of the Borrower

Third Federal's distribution of loans to borrowers of different income levels is weak. This conclusion is based on weak home mortgage lending performance in the Cleveland AA. The bank did not purchase any reportable loans during the evaluation period, and does not conduct any small business or farm lending.

Home Mortgage Loans

The borrower distribution of home mortgage loans is weak. This conclusion is based on weak performance in the Cleveland AA. Refer to Tables 8a, 9a, and 10a in the Ohio section of Appendix D for the primary facts and data used to evaluate the borrower distribution of the bank's home mortgage loan activity. In drawing overall borrower distribution conclusions, individual loan products were considered based on loan volume. Therefore, home refinance activity was given the greatest consideration, followed by home purchase activity and then home improvement activity.

In evaluating the borrower distribution of home mortgage loans relative to area demographics, as reflected by the percentage of families in each income category, we considered that barriers to home ownership exist for the segment of the population that lives below the poverty line, and the general impact that this has on the opportunity to lend to the low-income population of the community. According to 2010 census data, 14 percent of households in the Cleveland AA have incomes below the poverty level.

Our analysis considered that Third Federal only offers conventional home mortgage loans, and does not offer government-backed loan products. Aggregate lending data for the overall market includes activity of lenders that also offer government-backed products such as Federal Housing Administration, Veteran's Administration, Farm Service Agency, and Rural Housing Services loans. Our analysis of aggregate lending data for the Cleveland AA determined that a fair portion of the lending activity of the AA's low- and moderate-income borrowers was addressed through loan types that the bank does not offer. Approximately 58 percent of the number of home purchase loans and 10 percent of the number of home refinance loans originated to low-income borrowers during the evaluation period were government-backed loans. Nearly 53 percent of home purchase loans and 14 percent of home refinance loans originated to moderate-income borrowers were government-backed loans. The aggregate lending numbers in Appendix D tables reflect all types of lending activity. However, we also measured the bank's lending against the aggregate market's conventional lending activity to more closely compare the bank to the market using only bank-offered products. While government-backed loan products are available for home purchase and home refinance needs, they generally are not for home improvement purposes. Therefore, our analyses of government-backed lending did not extend to home improvement loans.

We also considered loan modification activity that Third Federal provided, which is not included in the home mortgage lending data. During the evaluation period, the bank modified 443 loans in the Cleveland AA, many of which were modified to address hardship needs of existing borrowers and addressed a credit need without generating a new reportable loan. While income information on all loan modifications was not readily available, our review of a statistical sample of the bank's loan modifications reflected that 30 percent of modifications were to low-income borrowers and 36 percent were to moderate-income borrowers. Loan

modifications were primarily alternatives to home refinance loans, as opposed to home purchase or home improvement loans. Therefore, loan modification activity and impact were only considered when drawing final conclusions on home refinance performance.

Home Purchase Loans

The borrower distribution of home purchase loans is weak in the Cleveland AA, even when considering the degree to which aggregate lending data is impacted by government-backed loans. Table 8a in the Ohio section of Appendix D reflects Third Federal's weak performance. The percentage of loans that the bank originated to low-income borrowers is significantly below the percentage of lending performed by the aggregate market, and significantly below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is well below the percentage of lending performed by the aggregate market, and below the percentage of moderate-income families in the AA. When we measured the bank's performance against the aggregate market's conventional lending activity, we determined that performance improved but still reflected weak performance overall. Our conclusion reflect that the bank's percentage of lending to low-income borrowers was well below the aggregate market, and the bank's percentage of lending to moderate-income borrowers was below the aggregate market.

Home Improvement Loans

The borrower distribution of home improvement loans is very weak in the Cleveland AA. The percentages of loans originated to both low-income and moderate-income borrowers are significantly below the percentages of lending performed by the aggregate market, and are significantly below the percentages of low-income and moderate-income families in the AA.

Home Refinance Loans

The borrower distribution of home refinance loans is weak in the Cleveland AA when considering all factors, including both the degree to which aggregate lending data is impacted by government-backed loans and Third Federal's modification activity. Table 10a in the Ohio section of Appendix D reflects very weak performance, as the percentage of loans originated to low-income borrowers is significantly below the percentage of lending performed by the aggregate market and significantly below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is well below the percentage of lending performed by the aggregate market, and well below the percentage of moderate-income families in the AA. When we measured the bank's performance against the aggregate market's conventional lending activity and considered the bank's loan modification activity, we determined that performance is weak rather than very weak. Our conclusion reflected that the bank's lending performance improved when measured against the aggregate market conventional loan activity. Regardless, the bank's level of lending to low-income borrowers remained significantly below the aggregate market. While the percentage of lending to moderate-income borrowers was significantly below the aggregate market's conventional activity levels, it improved and approached weak performance levels. The bank's lending record was positively impacted by the bank's 443 loan modifications during the evaluation period. As stated above, our analysis of a statistical sample of modifications determined that nearly 30 percent of modifications were to low-income borrowers, and 36 percent were to moderate-income borrowers.

Community Development Lending

Refer to Table 1 - Lending Volume in the State of Ohio section of Appendix D for the facts and data used to evaluate Third Federal's level of CD lending. This table includes all CD loans. The bank did not originate or purchase any multifamily loans that also qualify as CD loans.

Third Federal did not have any CD lending activity during the evaluation period. However, Third Federal Foundation originated one CD loan for \$300,000 during the period. The purpose of the loan was to renovate a retail shopping center in a low-income Cleveland neighborhood as part of an effort to revitalize and stabilize the area. While the loan was responsive to local credit needs, we determined that the CD lending activity has a neutral impact on the bank's overall Lending Test rating. In drawing our conclusions, we considered that bank operations are substantially focused on home mortgage lending, with limited capacity for CD lending.

Product Innovation and Flexibility

Third Federal offers and participates in several lending programs designed to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. The bank couples its offering of these loan programs with its HomeToday homebuyer education program, as further discussed under the Investment Test and Service Test.

Third Federal's HomeReady Mortgage is a flexible loan targeted to low- and moderate-income borrowers, featuring low down payments and interest rates. The bank's Home At Last program is a savings match program for down payment assistance for low- and moderate-income borrowers. The bank also participates in various local down payment assistance programs within the Cleveland AA.

During the evaluation period, Third Federal modified loans to existing borrowers, demonstrating a flexible approach to addressing the credit needs of home owners that would not otherwise qualify for loan refinancing. As also discussed under the Geographic Distribution and Borrower Distribution sections, the bank modified 443 loans in the Cleveland AA during the evaluation period, many of which were made to address hardship needs of existing borrowers.

Other than loan modifications, lending activity records associated with the flexible lending products are not readily available. Bank management acknowledges that activity levels have been limited. Therefore, except as discussed under the Geographic Distribution and Borrower Distribution sections where loan modification activity was considered in drawing conclusions, performance associated with flexible programs has a neutral impact on lending performance in the Cleveland AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Akron AA is weaker than the bank's performance in the Cleveland AA. The weaker performance is due to weaker geographic and borrower performance, as modification activity did not impact conclusions to the degree that it did in the Cleveland AA. The overall weaker performance in the Akron AA did not further lower the Needs to Improve Lending Test rating in Ohio, as the

Akron AA provides minor portions of the bank's deposits and loans in the state. However, the Akron AA performance did further solidify the overall Lending Test rating for Ohio. Refer to Tables 1 through 10a in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Third Federal's performance under the Investment Test in Ohio is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Cleveland AA is adequate.

Refer to Table 14 in the State of Ohio section of Appendix D for the facts and data used to evaluate Third Federal's level of qualified investments.

During the evaluation period, Third Federal as well as its affiliate Third Federal Foundation (see Appendix A) made qualifying CD investments in the Cleveland AA totaling slightly more than \$4 million, which represents 0.28 percent of the bank's allocated Tier One capital. Despite the low volume of investments, the bank and foundation's responsiveness to the CD needs in the AA is adequate. The investments made were primarily focused on affordable housing, financial literacy, and social services, which were identified by our community contacts as being primary needs of the AA. The investments include a \$1 million investment in a low-income housing tax credit fund. In addition, the bank donated 14 properties valued at a total of \$265,100 to area organizations that focus on affordable housing for low- and moderate-income individuals. The remaining qualified investments included 288 separate donations totaling nearly \$2.8 million to organizations providing affordable housing, social services, and financial literacy programs to low- and moderate-income individuals and families. None of the investments demonstrated innovation or complexity.

Conclusions for Area Receiving Limited-Scope Reviews

Based on our limited-scope review, Third Federal's performance under the Investment Test in the Akron AA is not inconsistent with the bank's overall low-satisfactory performance under the Investment Test in Ohio. During the evaluation period, the bank and Third Federal Foundation donated four properties valued at \$113,300 to area organizations focused on affordable housing. The bank and foundation also made 72 donations totaling \$261,570 to area organizations providing affordable housing and social services to low- and moderate-income individuals and families. Refer to Table 14 in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Third Federal's performance under the Service Test in Ohio is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Cleveland AA is adequate.

Retail Banking Services

Refer to Table 15 in the State of Ohio section of Appendix D for the facts and data used to evaluate the distribution of Third Federal's branch delivery system and branch openings and closings.

Third Federal's branches are reasonably accessible to the Cleveland AA, considering the bank's limited branch network compared to its size of operations. Overall, systems for delivering retail banking services are adequate. With \$5.57 billion in AA deposits, the bank operates 18 offices in the area, including one in a low-income CT and one in a moderate-income CT. The percentage of offices located in low-income CTs is well below the percentage of the AA's population living in low-income CTs, and the percentage of branches in moderate-income CTs is significantly below the percentage of the population living in the AA's moderate-income CTs. However, percentages are less meaningful when they are based on few offices. Compared to other depository institutions operating in the AA, the bank's branch network is limited. The other seven institutions with \$3 billion or more in local deposits each have between 37 and 72 offices serving the Cleveland AA.

During the evaluation period, Third Federal consolidated two branches into one office in a new location, all of which occurred in middle-income portions of the AA. While this resulted in the net loss of one branch, the activity has generally not adversely affected the accessibility of the bank's products and services in the AA. Branch office hours and the level of services available do not vary in ways that inconvenience any portions of the bank's AA, including low- and moderate-income CTs.

While Third Federal does not operate any ATMs, the bank has contracted with a larger financial institution to provide the bank's customers with limited non-deposit surcharge-free access to the larger bank's ATM system. Other alternative delivery systems offered by the bank include online banking, mobile banking, and Internet banking. These systems did not impact our conclusions regarding the accessibility of the bank's delivery systems, as no information is available regarding their impact on serving the low- and moderate-income segments of the community.

Community Development Services

Third Federal provided an adequate level of CD services to the Cleveland AA during the evaluation period. Bank personnel provide financial and technical expertise to organizations involved in affordable housing, social services for low- and moderate-income individuals, financial literacy programs, and economic development. The bank's officers and staff participated in 80 organizations during the evaluation period. Primary examples are provided below.

Bank officers and staff are active members of committees and boards of organizations that provide CD programs for the local community, including affordable housing and social services for low- and moderate-income individuals. An example is the Empowering and Strengthening Ohio's People (ESOP) organization. Programs include Pre-purchase Homebuyer Counseling, Income Tax Assistance, and a Senior Property Tax Loan Program.

Employees have participated in seminars covering various topics including budgeting, credit, and other financial needs, with in-depth instruction and follow-up for low- and moderate-income adults and students. The number of participants totaled 2,100 during the evaluation period.

Third Federal provides support for social services including feeding the hungry, adult services, clothing, education, and technology to low- and moderate-income senior individuals.

Third Federal focuses on providing education for home ownership. For example, the bank sponsors the Home Today program. This program includes seminar participants meeting one-on-one with a Third Federal-referred HUD-approved credit counselor. After counseling has been completed, participants receive a Certificate of Completion that allows them to move forward with a mortgage application to request Home Today benefits including a credit towards closing costs. Most benefits can be used with the mortgage product of the participant's choice.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Third Federal's performance under the Service Test in the Akron AA is not inconsistent with the bank's overall Low Satisfactory performance under the Service Test in Ohio. While only one of the bank's three offices is located in a moderate-income CT, and none are located in a low-income CT, the bank's presence in the market overall is limited. Refer to Table 15 in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

State Rating

State of Florida

CRA Rating for Florida:	<u>Needs to Improve</u>
The lending test is rated:	<u>Needs to Improve</u>
The investment test is rated:	<u>Needs to Improve</u>
The service test is rated:	<u>Low-satisfactory</u>

The major factors that support this rating include:

- Third Federal's overall volume of lending activity in the state of Florida is adequate.
- Third Federal's record of lending in low- and moderate-income geographies and to low- and moderate-income borrowers is weak, as few loans were made to those segments of the community during the evaluation period.
- Third Federal's CD investment performance in Florida is weak.
- Third Federal's branch distribution in Florida is adequate. Products and services are reasonably accessible to essentially all portions of the bank's AAs, including the low- and moderate-income segments of the community.
- CD service activity in Florida is adequate.

Description of Institution's Operations in Florida

Third Federal's operations in Florida provide approximately 29 percent of the bank's deposits and 26 percent of the loans that the bank reported within its AAs during the evaluation period. The bank operates a branch network that includes 17 offices in six market areas in Florida, and offers its full range of consumer loan and deposit products and services in the state. Lending products include residential home mortgage loans, as well as home equity loans and home equity lines of credit.

Third Federal has six AAs within the state of Florida. The Tampa AA is within the Tampa-St. Petersburg-Clearwater, FL MSA 45300, and is the bank's most significant AA in Florida. The second most significant AA is the West Palm Beach-Boca Raton-Delray Beach, FL MSA 48424 (Palm Beach AA). Other AAs are the Cape Coral-Fort Myers, FL MSA 15980 (Fort Myers AA); the Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD 22744 (Fort Lauderdale AA); the Naples-Immokalee-Marco Island, FL MSA 34940 (Naples AA), and a portion of the North Port-Sarasota-Bradenton, FL MSA 35840 (Sarasota AA).

Third Federal has a limited presence in the state and within its individual markets. According to the June 30, 2015, FDIC deposit market share data, the bank's statewide deposits totaled \$2.49 billion, which ranked the bank twenty-seventh out of 254 financial institutions, with less than 1 percent market share. Within the Tampa Bay AA, the bank had five offices with \$1.01 billion in deposits, and a ranking of eleventh out of 63 financial institutions with a 2 percent market share. In the Palm Beach AA, the bank had four offices with \$653 million in deposits, a

ranking of thirteenth out of 58 financial institutions, and a 1 percent market share. In the Fort Myers AA, the bank had two offices with \$255 million in deposits, a ranking of nineteenth out of 35 financial institutions, and a 2 percent market share. In the Fort Lauderdale AA, the bank had four offices with \$239 million in deposits, a ranking of twenty-first out of 50 financial institutions, and a less than 1 percent market share. In the Naples AA, the bank had one office with \$99 million in deposits, a ranking of twenty-first out of 38 financial institutions, and a less than a 1 percent market. In the Sarasota AA, the bank had one office with \$261 million in deposits, a ranking of thirteenth out of 39 financial institutions, and a 2 percent market share.

Please refer to the community profiles for the state of Florida in Appendix C for detailed demographics and other performance context information for the AAs that received full-scope reviews. Refer to Appendix A for listing of counties that comprise the AAs.

Scope of Evaluation in Florida

The Tampa and Palm Beach AAs were selected for full-scope reviews. While Third Federal's presence in each of its Florida AAs is limited, the Tampa and Palm Beach AAs provide nearly 67 percent of the bank's Florida deposits and nearly 58 percent of the total number of reported loans from Florida AAs during the evaluation period. The remaining AAs in Florida were evaluated using limited-scope procedures, with each representing a small portion of the bank's operations in Florida. Each area is served by a variety of institutions with higher deposit and lending levels than this bank's. According to June 30, 2015, FDIC deposit data, the bank's deposit market share was 2 percent or less in each AA. Please refer to Appendix A for additional information regarding which areas received full- and limited-scope reviews.

Florida ratings are based primarily on conclusions reached for performance in the two AAs where we used full-scope procedures. In drawing conclusions relative to Third Federal's performance, we took into consideration community information obtained by the OCC, the bank, and members of the local community in the full-scope AAs. In the Tampa AA, we considered information from three organizations, including one focused on affordable housing, one focused on CD, and one that provides social services to low- and moderate-income segments of the community. In the Palm Beach AA, we obtained information from three organizations including one focused on affordable housing, one on small business development, and one on economic development. Refer to the community profiles in Appendix C for information including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Third Federal's performance under the Lending Test in Florida is rated Needs to Improve. Based on full-scope reviews, the bank's performance in the Tampa AA and the Palm Beach AA is weak.

Lending Activity

Refer to Table 1 - Lending Volume in the State of Florida section of Appendix D for the facts and data used to evaluate Third Federal's lending activity.

Third Federal's volume of lending activity is adequate in the Tampa and Palm Beach AAs. In drawing our conclusions, we considered that the bank's operations are focused on home mortgage lending, with no business-related products. The bank's volume of lending activity is reasonably commensurate with its local deposit market share and limited branch presence, especially when considering the large number of lenders operating in the AAs. There are significantly more lenders operating in the areas than there are depository institutions with branches. Many of the competing lenders are either non-depository institutions, or are depository institutions that do not operate branches in the AA.

Tampa AA

The June 30, 2015, FDIC deposit market share data for the Tampa AA reflects that Third Federal was ranked eleventh in deposits among 63 depository institutions, with a 2 percent market share, while according to 2014 peer mortgage data the bank ranked twenty-second in overall mortgage originations among more than 700 lenders, with a 1 percent market share. The bank ranked eighth in home refinance lending with a 3 percent market share. For home purchase and home improvement lending, the bank ranked sixty-sixth and twenty-third respectively, and had market shares of less than 1 percent.

Palm Beach AA

The June 30, 2015, FDIC deposit market share data for the Palm Beach AA reflects that Third Federal was ranked thirteenth in deposits among 58 depository institutions, with a 1 percent market share, while according to 2014 peer mortgage data the bank ranked twentieth in overall mortgage originations among more than 600 lenders, with a 1 percent market share. The bank ranked seventh in home refinance lending, with a 3 percent market share. For home purchase and home improvement lending, the bank ranked fifty-ninth and twenty-second respectively, and had market shares of less than 1 percent.

Distribution of Loans by Income Level of the Geography

Third Federal's geographic distribution of loans is weak. This conclusion is based on weak home mortgage lending performance in the Tampa and Palm Beach AAs. The bank did not purchase any reportable loans during the evaluation period, and does not conduct any small business or farm lending.

Home Mortgage Loans

Third Federal's geographic distribution of home mortgage loans is weak. This conclusion is based on weak performance in the Tampa and Palm Beach AAs. Refer to Tables 2a, 3a, and 4a in the Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan activity. In drawing overall geographic distribution conclusions, individual loan products were considered based on loan volume. Therefore, home refinance activity was given the greatest consideration, followed by home purchase activity and then home improvement activity. The bank did not originate or purchase any multifamily loans during the evaluation period.

Our analysis considered that Third Federal offers only conventional home mortgage loans, and does not offer government-backed loan products. Aggregate lending data for the overall market includes activity of lenders that also offer government-backed products such as Federal Housing Administration, Veteran's Administration, Farm Service Agency, and Rural Housing Services loans. Our analysis of aggregate lending data during the three-year evaluation period determined that a fair portion of the lending activity in the low- and moderate-income CTs in both the Tampa and Palm Beach AAs was through loan types that the bank does not offer. Approximately 45 percent of the number of home purchase loans and 18 percent of home refinance loans originated in the Tampa AA's low-income CTs during the evaluation period were government-backed loans. In the Tampa AA's moderate-income CTs, 48 percent of home purchase loans and nearly 19 percent of home refinance loans were government-backed loans. In the Palm Beach AA, 29 percent of the number of home purchase loans and eight percent of home refinance loans originated in low-income CTs were government-backed loans, and 46 percent of home purchase loans and 11 percent of home refinance loans in moderate-income CTs were government-backed loans. The aggregate lending activity in Appendix D tables reflect all types of lending activity. However, we also measured the bank's lending against the aggregate market's conventional lending activity to more closely compare the bank to the market using only bank-offered products. While government-backed loan products are available for home purchase and home refinance needs, they generally are not available for home improvement purposes. Therefore, our analyses of government-backed lending did not extend to home improvement loans.

We also considered loan modification activity that Third Federal provided, which is not included in the home mortgage lending data. Many of the loan modifications were made to address hardship needs of existing borrowers, and addressed a credit need without generating a new reportable loan. During the evaluation period, five out of 60 loan modifications (8 percent) in the Tampa AA were in low-income CTs, and 15 loan modifications (25 percent) were in moderate-income CTs. In the Palm Beach AA, none of the 29 loan modifications were in low-income CTs, while three (10 percent) were in moderate-income CTs. Loan modifications were primarily alternatives to home refinance loans as opposed to home purchase or home improvement loans. Therefore, loan modification activity and impact were considered when drawing final conclusions on home refinance performance.

Tampa AA

Home Purchase Loans

Third Federal's overall geographic distribution of home purchase loans is adequate in the Tampa AA, when considering the degree to which aggregate lending data is impacted by government-backed loans. Table 2a in the Florida section of Appendix D reflects weak performance. The bank originated no loans in low-income CTs during the three-year evaluation period. In moderate-income CTs, the percentage of the bank's loans is well below the percentage of lending performed by the aggregate market, and significantly below the percentage of the AA's owner-occupied housing units located in that segment of the community. However, when we measured the bank's performance against the aggregate market's conventional lending activity, we determined that performance was adequate rather than weak. Based on the bank's loan volume, it would only need to make two loans in low-income CTs to substantially meet the aggregate market's percentage of lending in those CTs. In moderate-income CTs, the bank's percentage of lending was adequate in relation to the aggregate market's lending record.

Home Improvement Loans

Third Federal's geographic distribution of home improvement loans is very weak in the Tampa AA. The percentages of loans originated in both low-income and moderate-income CTs are significantly below the percentages of lending performed by the aggregate market, and significantly below the percentages of the AA's owner-occupied housing units located in those respective CTs. With the bank only originating 39 home improvement loans in the AA during the three-year period, this product has limited impact on our overall conclusions.

Home Refinance Loans

Third Federal's geographic distribution of home refinance loans is weak in the Tampa AA when considering all factors, including the degree aggregate lending data is impacted by government-backed loans and the bank's loan modification activity. Table 4a in the Florida section of Appendix D reflects weak performance overall. In low-income CTs, performance is very weak as the percentage of loans originated by the bank in low-income CTs is significantly below the percentage of lending performed by the aggregate market, and significantly below the percentage of the AA's owner-occupied housing units located in low-income CTs. The bank's performance is weak in moderate-income CTs, as the percentage of its loans is well below the percentage of lending performed by the aggregate market and significantly below the percentage of the AA's owner-occupied housing units located in that segment of the community. When we measured the bank's performance against the aggregate market's conventional lending activity and considered the bank's loan modification activity, our analysis reflected that its lending performance improved but that overall performance remains weak. The bank's performance was very weak in low-income CTs and weak in moderate-income CTs, as the percentage of the bank's loans remained well below the aggregate market's lending levels. While loan modification activity positively impacted the bank's lending record to some degree, we determined that the five modifications in low-income CTs and 15 modifications in moderate-income CTs was not sufficient to impact our conclusions regarding the bank's geographic distribution performance for home refinance lending.

Palm Beach AA

Home Purchase Loans

Third Federal's geographic distribution of home purchase loans is adequate in the Palm Beach AA, when considering the degree aggregate lending data is impacted by government-backed loans. Table 2a in the Florida section of Appendix D reflects very weak performance in low-income CTs, as the percentage of the bank's loans originated in low-income CTs is significantly below the percentage of lending performed by the aggregate market and significantly below the percentage of the AA's owner-occupied housing units located in low-income CTs. The table reflects adequate performance in moderate-income CTs, as the percentage of the bank's loans is below the percentage of lending performed by the aggregate market. The percentage of lending in moderate-income CTs is well below the percentage of the AA's owner-occupied housing units located in that segment of the community. When we measured the bank's performance against the aggregate market's conventional lending activity, we determined that overall performance is adequate. While the percentage of the bank's loans was significantly below the aggregate market's, the significance in terms of number of loans was not substantial. It would only take two additional Third Federal loans in low-income CTs to slightly exceed the aggregate percentage. In moderate-income CTs, the bank's percentage of loans exceeded the aggregate percentage. However, the percentages have limited significance, as differences between performance categories are represented by a low number of loans.

Home Improvement Loans

Third Federal's geographic distribution of home improvement loans is very weak in the Palm Beach AA. The percentages of loans originated in both low-income and moderate-income CTs are significantly below the percentages of lending performed by the aggregate market, and significantly below the percentages of the AA's owner-occupied housing units located in those respective CTs. With the bank only originating 28 home improvement loans in the AA during the three-year period, this product has limited impact on our overall conclusions.

Home Refinance Loans

Third Federal's geographic distribution of home refinance loans is weak in the Palm Beach AA when considering all factors, including the degree to which aggregate lending data is impacted by government-backed loans, and the bank's loan modification activity. Table 4a in the Florida section of Appendix D reflects very weak performance. The percentages of loans originated in both low-income and moderate-income CTs are significantly below the percentages of lending performed by the aggregate market, and significantly below the percentages of the AA's owner-occupied housing units located in those respective CTs. However, when we measured the bank's performance against the aggregate market's conventional lending activity and considered the bank's loan modification activity, our analysis reflected that the bank's performance is weak rather than very weak. While the bank's performance in low-income CTs remained very weak, less than 1 percent of lending by the aggregate market was in low-income CTs. In moderate-income CTs, the percentage of the bank's loans was well below the aggregate market. While the percentages of loans originated in both low-income and moderate-income CTs were significantly below the percentages of lending performed by the aggregate market, the percentages reflect limited significance, as the differences between the

performance categories are represented by a low number of loans. Loan modification activity had a modest impact on the bank's lending record, as none were made in low-income CTs, and only three were in moderate-income CTs.

Lending Gap Analysis

We analyzed Third Federal's home mortgage lending activity during the evaluation period to identify any gaps in the bank's geographic distribution of loans. We did not identify any unexplained conspicuous gaps in the Tampa or Palm Beach AAs. In drawing this conclusion, we considered that the bank's overall presence is limited in each of these AAs. Furthermore, large portions of the Palm Beach AA is comprised of uninhabited land including wildlife reserves and the Everglades. Regardless, the bank's penetration into portions of the AAs varied considerably. In the Tampa AA, the bank made no loans in 243 of the AA's 698 CTs during the three-year evaluation period, and received no applications from 170 of those CT. In the Palm Beach AA, the bank made no loans in 103 of the AA's 337 CTs during the three-year evaluation period, and received no applications from 68 of those CTs. Our analyses reflected that the CTs with little or no Third Federal activity were a mix of CTs with opportunity to lend, and CTs with limited opportunities to lend as identified by low numbers of owner-occupied housing units and low volumes of conventional lending activity by the aggregate lending market. While no unexplained conspicuous gaps of lending were identified, the bank's penetration of the low- and moderate-income CTs in both the Tampa and Palm Beach AAs was very limited during the evaluation period, as the bank's lending activity was primarily centered in the middle- and upper-income CTs.

Inside/Outside Ratio

A majority of the number of loans that Third Federal originated during the evaluation period were within the bank's AAs, while just under half of the dollar amount of loans was within its AAs. This is considered adequate, considering the bank's multi-state lending operation and business strategy. Overall, 54 percent of the number of loans and 47 percent of the dollar amount of loans were within the bank's AAs. For home purchase loans, 59 percent of the number of loans and 56 percent of dollar amount of loans were within the AAs. For home improvement loans, 43 percent of the number of loans and 35 percent of the dollar amount of loans were within the AAs. For home refinance loans, 54 percent of the number of loans and 45 percent of the dollar amount of loans were within the AAs. These calculations are done on a bank-wide basis. This record of AA lending was considered a neutral factor when drawing conclusions relative to the overall geographic distribution of loans for the bank as a whole.

Distribution of Loans by Income Level of the Borrower

Third Federal's distribution of loans to borrowers of different income levels is weak. This conclusion is based on overall weak home mortgage lending performance in the bank's full-scope AAs. The bank did not purchase any reportable loans during the evaluation period, and does not conduct any small business or farm lending.

Home Mortgage Loans

Third Federal's overall borrower distribution of home mortgage loans is weak, based on weak performance in the Tampa and Palm Beach AAs. Refer to Tables 8a, 9a, and 10a in the Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan activity. In drawing overall borrower distribution conclusions, individual loan products were considered based on loan volume. Therefore, home refinance activity was given the greatest consideration, followed by home purchase activity and then home improvement activity.

In evaluating the borrower distribution of home mortgage, we considered that barriers to home ownership exist for the segment of the population that lives below the poverty line, and the general impact this has on opportunities to lend to the low-income population within the community. According to 2010 census data, 12 percent of households in the Tampa AA and 11 percent of households in the Palm Beach AA have incomes below the poverty level. Our analysis also considered how the high cost of housing in relation to income levels also impacts opportunities for lending to low- and moderate-income individuals in the Palm Beach AA. Refer to the community profile in Appendix C for further discussion.

Our analysis considered that Third Federal only offers conventional home mortgage loans, and does not offer government-backed loan products. Aggregate lending data for the overall market includes activity of lenders that also offer government-backed products such as Federal Housing Administration, Veteran's Administration, Farm Service Agency, and Rural Housing Services loans. Our analysis of aggregate lending data for the evaluation period determined that a fair portion of the lending activity of the AA's low- and moderate-income borrowers was addressed through loan types that the bank does not offer. Analysis for the Tampa AA determined that 55 percent of the number of home purchase loans and 5 percent of home refinance loans originated to low-income borrowers during the evaluation period were government-backed loans. We determined that 56 percent of home purchase loans and 7 percent of home refinance loans originated to moderate-income borrowers were government-backed loans. In the Palm Beach AA, 51 percent of the number of home purchase loans and 3 percent of home refinance loans originated to low-income borrowers were government-backed loans, and 47 percent of home purchase loans and nearly 6 percent of home refinance loans made to moderate-income borrowers were government-backed loans. The aggregate lending numbers in Appendix D tables reflect all types of lending activity. However, we also measured the bank's lending against the aggregate market's conventional lending activity to more closely compare the bank to the market using only bank-offered products. While government-backed loan products are available for home purchase and home refinance needs, they generally are not for home improvement purposes. Therefore, our analyses of government-backed lending did not extend to home improvement loans.

We also considered loan modification activity that Third Federal provided, which is not included in the home mortgage lending data. During the evaluation period, the bank modified 60 loans in the Tampa AA and 29 loans in the Palm Beach AA, many of which were made to address hardship needs of existing borrowers, and addressed a credit need without generating a new reportable loan. While income information on all loan modifications was not readily available, our review of a statistical sample of the bank's loan modifications reflected that 30 percent of modifications were to low-income borrowers, and 36 percent were to moderate-income borrowers. Loan modifications were primarily alternatives to home refinance loans, as opposed to home purchase or home improvement loans. Therefore, loan modification activity and impact were only considered when drawing final conclusions on home refinance performance.

Tampa AA

Home Purchase Loans

Third Federal's borrower distribution of home purchase loans is adequate in the Tampa AA when considering all factors, including the degree to which aggregate lending data is impacted by government-backed loans. Table 8a in the Florida section of Appendix D reflects weak performance. The percentage of loans originated to low-income borrowers is well below the percentage of lending performed by the aggregate market, and significantly below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is well below the percentage of lending performed by the aggregate market, and well below the percentage of moderate-income families in the AA. However, when we measured the bank's performance against the aggregate market's conventional lending activity, we determined that performance was improved and reflected overall adequate performance. Our conclusion reflected that the percentage of lending to low-income borrowers was substantially equal to that of the aggregate market, and that the percentage of lending to moderate-income borrowers was near the aggregate market percentage. Regardless, the percentages reflect limited significance, as the differences between performance categories are represented by few loans.

Home Improvement Loans

Third Federal's borrower distribution of home improvement loans is very weak in the Tampa AA. The percentages of loans originated to both low-income and moderate-income borrowers are significantly below the percentages of lending performed by the aggregate market, and significantly below the percentages of low-income and moderate-income families in the AA. With the bank only originating 39 home improvement loans in the AA during the three-year period, this product does not have a limited impact on overall conclusions.

Home Refinance Loans

Third Federal's borrower distribution of home refinance loans is weak in the Tampa AA, when considering all factors including both the degree to which aggregate lending data is impacted by government-backed loans, and the bank's modification activity. Table 10a in the Florida section of Appendix D reflects very weak performance, as the percentages of loans originated to low-income borrowers and moderate-income borrowers are significantly below the percentages of lending performed by the aggregate market, and significantly below the

percentages of low- and moderate-income families in the AA. However, when we measured the bank's performance against the aggregate market's conventional lending activity and considered the bank's loan modification activity, we determined that performance is weak rather than very weak. Our conclusion reflected that the bank's lending performance improved when measured against the aggregate market conventional loan activity, but that the percentage of its lending to low-income borrowers remained significantly below the aggregate market. The percentage of lending to moderate-income borrowers was significantly below the aggregate market's conventional activity levels, but approached weak performance levels. The bank's lending record was positively impacted by its 60 loan modifications during the evaluation period. As stated above, our analysis of a statistical sample of modifications determined that nearly 30 percent of modifications were to low-income borrowers, and 36 percent were to moderate-income borrowers.

Palm Beach AA

Home Purchase Loans

Third Federal's borrower distribution of home purchase loans is adequate in the Palm Beach AA when considering all factors, including both the degree to which aggregate lending data is impacted by government-backed loans and the high cost of housing relative to income levels. Table 8a in the Florida section of Appendix D reflects weak performance. The percentage of loans originated to low-income borrowers exceeds the percentage of lending performed by the aggregate market, but is well below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is significantly below the percentage of lending performed by the aggregate market, and significantly below the percentage of moderate-income families in the AA. However, when we measured the bank's performance against the aggregate market's conventional lending activity, and considered the high cost of housing, we determined that performance is adequate overall. Our conclusion reflected that the percentage of lending to low-income borrowers exceeded the aggregate market, while the percentage of lending to moderate-income borrowers was well below the aggregate market percentage. For both low-income and moderate income borrowers, the percentages reflect limited significance, as the differences between performance categories are represented by few loans.

Home Improvement Loans

Third Federal's overall borrower distribution of home improvement loans is adequate overall in the Palm Beach AA. The percentage of loans originated to low-income borrowers is below the percentage of lending to low-income borrowers by the aggregate market, and significantly below the percentage of low-income families in the AA. The percentage of loans originated to moderate-income borrowers is generally near the percentage of loans to moderate-income borrowers originated by the aggregate market, and is generally near the percentage of moderate-income families in the AA. With the bank only originating 28 home improvement loans in the AA during the three-year period, this product has a limited impact on our overall conclusions.

Home Refinance Loans

Third Federal's borrower distribution of home refinance loans is weak in the Palm Beach AA when considering all factors, including the degree to which aggregate lending data is impacted by government-backed loans, the high cost of housing relative to income levels, and the bank's modification activity. Table 10a in the Florida section of Appendix D reflects very weak performance. The percentage of loans originated to low-income borrowers is significantly below the percentage of lending performed by the aggregate market, and significantly below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is well below the percentage of lending performed by the aggregate market, and significantly below the percentage of moderate-income families in the AA. When we considered how the high cost of housing could impact lending opportunities to low- and moderate-income individuals, and measured the bank's performance against the aggregate market's conventional lending activity, we determined that the bank's lending performance is weak rather than very weak. The percentages of loans originated to low- and moderate-income borrowers were well below the percentages by the aggregate market. The bank's loan modification activity, which totaled 29 transactions during the evaluation period, had only a modest impact on the bank's performance. As stated above, our analysis of a statistical sample of modifications determined that nearly 30 percent of modifications were to low-income borrowers, and 36 percent were to moderate-income borrowers.

Community Development Lending

Refer to Table 1 - Lending Volume in the State of Florida section of Appendix D for the facts and data used to evaluate Third Federal's level of CD lending. This table includes all CD loans. The bank did not originate or purchase any multifamily loans that also qualify as CD loans.

Third Federal did not make any CD loans in Florida during the evaluation period. As the bank's operations are substantially focused on home mortgage lending, with limited capacity for CD lending, the absence of CD lending has a neutral impact on its Lending Test rating.

Product Innovation and Flexibility

Third Federal offers and participates in several lending programs designed to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. The bank couples its offering of these loan programs with the bank's HomeToday homebuyer education program, as further discussed under the Investment Test and Service Test.

Third Federal's HomeReady Mortgage is a flexible loan targeted to low- and moderate-income borrowers, featuring low down payments and interest rates. The bank's Home At Last program is a savings match program for down payment assistance for low- and moderate-income borrowers. The bank also participates in other down payment assistance programs within Florida markets.

During the evaluation period, Third Federal modified loans to existing borrowers, demonstrating a flexible approach to addressing the credit needs of home owners who would

not otherwise qualify for loan refinancing. As also discussed under the Geographic Distribution and Borrower Distribution sections, the bank modified 60 loans in the Tampa AA and 29 loans in the Palm Beach AA during the evaluation period, many of which were made to address hardship needs of existing borrowers.

Other than loan modifications, lending activity records associated with the flexible lending products are not readily available. Bank management acknowledges that activity levels have been limited. Therefore, except as discussed under the Geographic Distribution and Borrower Distribution sections where loan modification activity was considered in drawing conclusions, performance associated with flexible programs has a neutral impact on lending performance in the Tampa and Palm Beach AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Third Federal's performance under the Lending Test in the Naples and Sarasota AAs is not inconsistent with the bank's Needs to Improve performance under the Lending Test for the full-scope areas in Florida. Performance in the Fort Lauderdale AA and the Fort Myers AA is weaker than the bank's performance in the full-scope AAs, as geographic and borrower distribution performance is weaker in both AAs. The weaker performance in the Fort Lauderdale and Fort Myers AAs did not further lower the Needs to Improve Lending Test rating in Florida, as these areas provide minor portions of the bank's deposits and loans in the state. However, performance in the limited-scope areas in general further solidified the overall Lending Test rating for Florida. Refer to Tables 1 through 10a in the State of Florida section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Third Federal's performance under the Investment Test in Florida is rated Needs to Improve. Based on full-scope reviews, the bank's performance in the Tampa AA is adequate and its performance in the Palm Beach AA is weak. Overall, the bank's performance is weak due to its limited CD investments in the Palm Beach and limited-scope AAs.

Refer to Table 14 in the State of Florida section of Appendix D for the facts and data used to evaluate Third Federal's level of qualified investments.

Tampa AA

During the evaluation period, Third Federal and its affiliate, Third Federal Foundation (see Appendix A), made qualifying CD investments in the Tampa AA totaling approximately \$800,000, which represents .06 percent of the bank's allocated Tier One capital. Despite the low volume of investments, the bank and foundation's responsiveness to the CD needs in the AA is adequate. The investments were primarily focused on affordable housing and social services, which were identified by our community contacts as primary needs of the AA. The qualified investments included 216 separate donations to organizations providing affordable housing and social services within the AA. None of the investments demonstrated innovation or complexity.

Palm Beach AA

During the evaluation period, Third Federal and its affiliate, Third Federal Foundation (see Appendix A), made qualifying CD investments in the Palm Beach AA totaling approximately \$155,000, representing .01 percent of the bank's allocated Tier-One capital. Despite the bank's limited presence and low level of deposits, the bank and foundation's responsiveness to the CD needs in the AA is weak. The qualified investments included 12 separate donations to organizations primarily providing social services, and one for affordable housing within the AA. Though these investments had a positive CD impact, the majority of the funds went to programs that were not identified as one of the primary needs within the AA. The performance in the Palm Beach AA, in conjunction with the bank's performance in the limited-scope areas, did have an impact on the overall performance in the state. None of the investments demonstrated innovation or complexity.

Refer to Table 14 in the State of Florida section of Appendix D for the facts and data used to evaluate Third Federal's level of qualified investments.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, Third Federal's performance under the Investment Test in the Fort Myers, Fort Lauderdale, Naples, and Sarasota AAs is not consistent with the bank's overall performance under the Investment Test in Florida. In all four AAs, the bank's performance is weaker than its overall performance in the state as reflected by lower investment levels, and is considered weak. Performance in the limited-scope areas, in combination with the bank's performance in the Palm Beach AA, did have an impact on the overall performance in the state. Refer to the Table 14 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Third Federal's performance under the Service Test in Florida is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Tampa AA and Palm Beach AA is adequate.

Retail Banking Services

Refer to Table 15 in the State of Florida section of Appendix D for the facts and data used to evaluate the distribution of Third Federal's branch delivery system and branch openings and closings.

Tampa AA

Third Federal's branches are reasonably accessible to the Tampa AA, considering the bank's limited branch network in the area. Overall, systems for delivering retail banking services are adequate. The bank operates five offices in the area, including one in a moderate-income CT. No offices are located in low-income CTs where approximately 4 percent of the AA's population is located. The percentage of offices located in moderate-income CTs is

substantially equal to the percentage of the AA's population that live in those CTs. However, percentages are less meaningful when they are based on few offices. The bank did not open or close any branches in the Tampa AA during the evaluation period. Branch office hours, and the level of services available, do not vary in ways that inconvenience any portions of the bank's AA, including low- and moderate-income geographies.

While Third Federal does not operate any ATMs, the bank has contracted with a larger financial institution to provide its customers with limited non-deposit surcharge-free access to the larger bank's ATM system. Other alternative delivery systems offered by the bank include online banking, mobile banking, and Internet banking. These systems did not impact our conclusions regarding the accessibility of the bank's delivery systems, as no information is available regarding their impact on serving the low- and moderate-income segments of the community.

Palm Beach AA

Third Federal's branches are reasonably accessible to the Palm Beach AA considering the bank's limited branch network in the area. Systems for delivering retail banking services are adequate. The bank operates four offices in the area, including one in a moderate-income CT. No offices are located in low-income CTs where approximately 5 percent of the AA's population is located. The percentage of offices located in moderate-income CTs is substantially equal to the percentage of the AA's population that live in those CTs. However, percentages are less meaningful when they are based on few offices.

Third Federal did not open or close any offices in the AA during the evaluation period. One office located in a middle-income CT was relocated approximately 200 yards. While the new location improved visibility, it otherwise did not materially impact the accessibility of the bank's products and services in the AA. Branch office hours and the level of services available do not vary in ways that inconvenience any portions of the bank's AA, including low- and moderate-income geographies.

While Third Federal does not operate any ATMs, the bank has contracted with a larger financial institution to provide its customers with limited non-deposit surcharge-free access to the larger bank's ATM system. Other alternative delivery systems offered by the bank include online banking, mobile banking, and Internet banking. These systems did not impact our conclusions regarding the accessibility of the bank's delivery systems as no information is available regarding their impact on serving the low- and moderate-income segments of the community.

Community Development Services

Tampa AA

Third Federal provides an adequate level of CD services to the AA. Bank personnel provide financial and technical expertise to organizations involved in affordable housing, social services for low- and moderate-income individuals, financial literacy programs, and economic development. The bank's officers and staff participated in 12 organizations during the assessment period. Primary examples include:

Bank officers and staff are active members of committees and boards of organizations that provide CD programs for the local community to support low- and moderate-income households and community revitalization / sustainability.

Employees have participated in seminars in Florida covering various topics including budgeting, credit and other financial needs with in-depth instructions and follow-up for low- and moderate-income adults and students.

Bank staff provides training or counseling related to financial matters such as budget and credit counseling, financial literacy, and home ownership.

Third Federal focuses on providing education for home ownership. For example, the bank sponsors a Home Today program within the Tampa AA. The program includes seminar participants meeting one-on-one with a Third Federal-referred HUD-approved credit counselor. After counseling has been completed, participants receive a Certificate of Completion, which allows them to move forward with a mortgage application to request Home Today underwriting benefits such as a credit towards closing costs. Most underwriting benefits can be used with the mortgage product of their choice.

Palm Beach AA

Third Federal provides an adequate level of CD services to the AA. Bank personnel provide financial and technical expertise to organizations involved in affordable housing, social services for low- and moderate-income individuals, financial literacy programs, and economic development. The bank's officers and staff participated in three organizations during the assessment period of 2013-2015. Primary examples include:

Employees have participated in seminars in Florida covering various topics including budgeting, credit, and other financial needs with in-depth instructions and follow-up for low- and moderate-income adults and students.

Bank staff provides training or counseling related to financial matters such as budget and credit counseling and home ownership.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Third Federal's performance under the Service Test in the Fort Myers, Fort Lauderdale, Naples, and Sarasota AAs is not inconsistent with the bank's overall Low Satisfactory performance under the Service Test in Florida. While only one of the eight Third Federal offices throughout these AAs is located in a moderate-income CT and none are located in a low-income CT, the bank's presence in the market is limited. Refer to Table 15 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

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 metropolitan and nonmetropolitan areas 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 except for CD lending: 1/1/2012 to 12/31/2014 CD lending, Investment Test and Service Test: 1/1/2012 to 12/31/2015	
Financial Institution	Products Reviewed	
Third Federal Savings and Loan Association of Cleveland, Cleveland, Ohio	Home mortgage loans, qualified investments, and CD services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Third Federal Foundation	Related Entity	CD loans, investments, and services.
List of AAs and Type of Examination		
AA	Type of Exam	Other Information (AA Counties)
State of Ohio		
Cleveland-Elyria MSA 17460	Full-scope	Cuyahoga, Lake, Lorain, Medina
Akron MSA 10420	Limited-scope	Summit
State of Florida		
Tampa-St. Petersburg-Clearwater MSA 45300	Full-scope	Hillsborough, Pasco, Pinellas
West Palm Beach-Boca Raton-Delray 48424	Full-scope	Palm Beach
Cape Coral-Ft. Myers MSA 15980	Limited-scope	Lee
Ft. Lauderdale-Pompano Beach-Deerfield Beach MD 22744	Limited-scope	Broward
Naples-Immokalee-Marco Island MSA 34940	Limited-scope	Collier
North Port-Sarasota-Bradenton MSA 35840	Limited-scope	Sarasota

Appendix B: Summary of State Ratings

RATINGS: Third Federal Savings and Loan Association of Cleveland				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
Third Federal Savings and Loan Association of Cleveland	Needs to Improve	Low Satisfactory	Low Satisfactory	Needs to Improve
State:				
State of Ohio	Needs to Improve	Low Satisfactory	Low Satisfactory	Needs to Improve
State of Florida	Needs to Improve	Needs to Improve	Low Satisfactory	Needs to Improve

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Community Profiles for Full-Scope Areas

State of Ohio Full-Scope Areas

Cleveland-Elyria, OH MSA (17460)

Demographic Information for Full-Scope Area: Cleveland AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs/BNAs)	615	16.91	21.79	35.77	24.72	0.81
Population by Geography	1,983,851	10.87	18.11	38.62	32.40	0.01
Owner-Occupied Housing by Geography	546,097	5.99	14.46	42.32	37.23	0.01
Business by Geography	138,647	8.02	13.81	38.42	39.37	0.39
Farms by Geography	3,273	3.02	8.80	44.21	43.94	0.03
Family Distribution by Income Level	509,669	22.22	17.40	20.63	39.75	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	201,946	20.11	26.26	36.77	16.85	0.01
MFI = \$62,627				Median Housing Value = \$148,109		
FFIEC Adjusted MFI for 2014 = \$62,600				Unemployment Rate = 6.2%		
Households Below the Poverty Level = 14%				(MSA 2014 Annual Unadjusted)		

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2014 FFIEC updated MFI, Bureau of Labor Statistics.

The Cleveland AA is comprised of Cuyahoga, Lake, Lorain, and Medina Counties, and reflects a majority of the Cleveland-Elyria OH MSA (17460). The City of Cleveland is the most significant municipality within the AA, and is the headquarters of Third Federal and its holding company. A substantial portion of the bank’s operations are based in this AA. Eighteen of the bank’s 21 Ohio branch offices are located in the area, with 14 branches in Cuyahoga County, two in Medina County, one in Lorain County, and one branch in Lake County. The June 30, 2015, FDIC deposit data reflects that nearly 92 percent of the bank’s deposits in Ohio and 65 percent of all of the bank’s deposits are from the Cleveland AA. The bank ranked third out of 35 financial institutions with a 9 percent share of the deposit market. The bank’s market share and ranking was generally consistent throughout the evaluation period.

The Cleveland AA was significantly impacted by the 2007-2009 financial crisis. During the evaluation period the area experienced recovery. Regardless, the population of the AA and the population of the City of Cleveland has been declining for several decades. According to 2010 U.S. Census data, the population for the Cleveland AA was 1.98 million, reflecting a 4 percent decline since the 2000 Census. While the declining population trend continued for the AA and the City of Cleveland during the evaluation period, the pace of decline slowed. The July 2015 population estimates by the U.S. Census Bureau reflected that the AA population declined by less than 1 percent since the 2010 Census, while the population of the City of Cleveland declined by 2 percent. A March 2016 report by the Federal Reserve Bank of Cleveland cited the population loss as having a dampening effect on the area economy, noting that employment levels, home prices, and homebuilding remain relatively weak largely

because of sustained population loss. The MFI for the MSA did not change between the 2010 Census, at \$62,627, and the 2014 FFIEC adjusted estimate of \$62,600. Approximately 14 percent of households were below the poverty level at the 2010 Census. The median housing value was just under \$150,000 in 2010, with sale prices trending slightly upward during the evaluation period.

The Cleveland AA has a diverse economy across industries such as manufacturing, healthcare, retail, construction, education, and government. The medical and education sectors are two anchors that have helped maintain employment levels in the area. Health care demand, impacted by an expanding elderly population, has prompted capital spending and hiring by local medical facilities. Traditional automobile and machinery production industries have also gained jobs, but growth in top-line manufacturing employment has been slower. Major employers include The Cleveland Clinic, University Hospitals Health Systems, Progressive Corp, KeyCorp, and MetroHealth System. The Cleveland AA unemployment rate declined during the evaluation period due to net job growth rather than a decline in the labor force. The annual unadjusted unemployment rate was 6.6 percent in 2012, and increased slightly to 6.9 percent in 2013. Subsequent to 2013, the annual unemployment levels declined to 6.2 in 2014 and 5.2 in 2015. In comparison, the annual unadjusted average unemployment rate for Ohio was 7.4 percent in 2012 and 7.5 percent in 2013. Subsequent to 2013, the state's annual unemployment rate declined to 5.7 percent in 2014 and 4.9 percent in 2015.

There is a high level of banking competition in the Cleveland AA. The June 30, 2015 FDIC deposit data reflected 35 depository institutions with 650 branch offices located in the AA. The top five depository institutions by deposits were KeyBank, N.A., PNC Bank, N.A., Third Federal, Citizens Bank, N.A., and The Huntington National Bank. Together, these institutions operated 293 offices in the AA and had a combined deposit market share of 66 percent. Even though Third Federal has a sizeable share of the deposit market, the bank has far fewer branches serving the market than the other banks. According to aggregate HMDA data from 2012 through 2014, over 400 lenders originated home loans in the AA each year. Third Federal ranked first among all mortgage lenders from 2012 through 2014. In 2014, the other top four mortgage lenders in the AA included Quicken Loans, Inc., First Federal Savings and Loan of Lakewood, Howard Hanna Mortgage Services, and Fifth Third Mortgage Company. JPMorgan Chase Bank, N.A. was among the top mortgage lenders in 2012 and 2013.

We contacted representatives from multiple local community organizations that provide or assist with addressing the affordable housing, economic development, and social service needs within the Cleveland AA. The representatives identified affordable housing as the primary need within the AA. The contacts also identified the need for improved access to affordable home loans, funding for financial literacy workshops, homeownership and foreclosure counseling, financial support for community services and operational costs, involvement by serving on advisory boards, small business loans and financing for small business incubator initiatives. One representative identified Third Federal as one of their strongest supporters.

State of Florida Full-Scope Areas

Tampa-St. Petersburg-Clearwater, FL MSA (45300)

Demographic Information for Full-Scope Area: Tampa AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs/BNAs)	698	4.73	25.36	39.83	28.80	1.29
Population by Geography	2,610,465	3.88	24.57	39.99	31.37	0.20
Owner-Occupied Housing by Geography	723,829	1.93	21.38	42.13	34.56	0.00
Business by Geography	312,830	2.92	20.61	38.05	38.26	0.16
Farms by Geography	7,155	2.22	22.17	41.68	33.92	0.01
Family Distribution by Income Level	649,472	20.56	18.19	19.60	41.64	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	251,689	6.49	36.11	40.04	17.36	0.00
MFI	= \$57,333	Median Housing Value		= \$200,913		
FFIEC Adjusted MFI for 2014	= \$57,400	Unemployment Rate (MSA Annual 2014 unadjusted)		= 6.1%		
Households Below the Poverty Level	= 12%					

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2014 FFIEC updated MFI, Bureau of Labor Statistics.

The Tampa AA consists of Hillsborough, Pasco, and Pinellas Counties, which reflects a majority of the Tampa-St. Petersburg-Clearwater, FL MSA (45300). Third Federal began operations in the AA in 1999. The bank has a limited presence in this AA, serving the area with five full-service offices. The bank has three branches in Pinellas County and one office in each of Hillsborough and Pasco counties. The June 30, 2015, FDIC deposit data reflects that nearly 41 percent of the bank's deposits in the state of Florida and 12 percent of all Third Federal deposits are from the Tampa AA. The bank ranked eleventh out of 63 financial institutions within the AA with a 2 percent market share.

The Tampa AA was significantly impacted by the 2007-2009 financial crisis. During the evaluation period the area experienced recovery, although home foreclosure rates remained high. According to 2010 U.S. Census data, the population for the AA was 2.61 million, reflecting a 15 percent increase from the 2000 Census. The 2015 population estimates reflect that the increasing population trend has continued, with the area nearing a population of 2.8 million. The AA's cost of living is below the national average, but income levels are low as well. MFI was \$57,333 at the 2010 census, with 2014 FFIEC adjusted levels about the same at \$57,400. Median housing values exceeded \$200,000 in 2010 and home sales prices generally increased during the evaluation period.

The Tampa AA has a diverse economy that includes healthcare, retail, services, higher education, and government. While tourism is a factor, the Tampa AA is not highly dependent on tourism. Major employers include Publix Supermarkets, Inc., BayCare Health Care Systems, Inc., University of South Florida, Verizon Communications, and MacDill Air Force Base. The unemployment rate within the MSA declined during the evaluation period. The annual unadjusted average unemployment rate was 8.3 percent in 2012, and declined to 7.0 percent in 2013. Unemployment levels continued to decline to 6.1 percent in 2014

and 5.2 in 2015. In comparison, the annual unadjusted average unemployment rate for the state of Florida declined from 8.3 percent in 2012 to 6.1 percent in 2014. As of year-end 2015, Florida's unemployment rate declined to 5.5 percent.

There is a high level of competition in the Tampa AA. According to the June 30, 2015 FDIC Deposit Market Share report, there were 63 financial institutions operating 712 offices within the AA. The top five depository institutions by deposits were Bank of America, N.A., Raymond James Bank, Wells Fargo Bank, N.A., SunTrust Bank, and Regions Bank, with a combined deposit market share of 68 percent. According to aggregate HMDA data from 2012 through 2014, over 700 lenders originated home loans in the AA each year. Third Federal ranked twenty-first in 2012 and 2013 and twenty-second in 2014. In 2014, the bank's market share totaled approximately 1 percent by both loan count and loan amount. Over the three-year period, the bank's market share also averaged approximately 1 percent based on loan count and loan amount. The top five lenders for 2012 and 2013 in the AA included Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., Quicken Loans, Inc., Bank of America, N.A., and SunTrust Mortgage. In 2014, Branch Banking and Trust Co. replaced SunTrust Mortgage as one of the top five lenders.

We contacted representatives from three local organizations that provide funding and services related to affordable housing, social services, and CD initiatives. The representatives identified CD needs related to affordable housing, financial literacy, funding for programs, grants for community and social service programs, small business financing, and the need for financial institutions to provide financial expertise and technical assistance to local organizations.

West Palm Beach-Boca Raton-Delray Beach, FL MD (48424)

Demographic Information for Full-Scope Area: Palm Beach AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs/BNAs)	337	6.23	24.93	31.45	35.01	2.37
Population by Geography	1,320,134	4.88	26.01	33.30	35.59	0.22
Owner-Occupied Housing by Geography	384,995	2.96	22.08	36.12	38.83	0.00
Business by Geography	209,104	3.49	18.95	31.70	45.67	0.19
Farms by Geography	4,336	3.85	22.07	29.96	44.07	0.05
Family Distribution by Income Level	324,849	21.50	17.84	18.93	41.73	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	127,797	8.13	36.53	34.23	21.11	0.00
MFI	= \$64,445	Median Housing Value		= \$288,519		
FFIEC Adjusted MFI for 2014	= \$63,300	Unemployment Rate		= 6.3%		
Households Below the Poverty Level	= 11%	(MSA 2014 Annual Unadjusted)				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Sources: 2010 U.S. Census, 2014 FFIEC updated MFI, Bureau of Labor Statistics.

The Palm Beach AA is comprised of Palm Beach County, which is also the West Palm Beach-Boca Raton-Delray Beach, FL MD (48424). The AA is also a portion of the Miami-Fort Lauderdale-West Palm Beach MSA (33100). Large portions of the county are comprised of uninhabited lands, including wildlife reserves and the Everglades. Third Federal began its operations there in 2000. The bank has a limited presence in this AA, serving the area with four full-service offices located in Delray Beach, North Palm Beach, Greenacres, and Boca Raton. The June 30, 2015 FDIC deposit data reflects that approximately 26 percent of the bank’s deposits in the state of Florida and eight percent of all of the bank’s deposits are from the Palm Beach AA. The bank ranked thirteenth out of 58 financial institutions with a 1 percent share of the deposit market.

Palm Beach County was severely impacted the 2007-2009 financial crisis. During the evaluation period the area experienced recovery. Regardless, the cost of living remains high even though there have been improvements in employment, foreclosure filings, housing sales, and other conditions. The area has experienced population growth due to a stronger job market and recovering real estate values. Between 2010 and 2015, the area’s population grew by nearly 8 percent. According to Moody’s analytics, south Florida’s overall population growth has risen two-thirds faster than the national pace over the past three years.

Housing costs are high in relation to MFI. The median housing value was more than \$288,000 in 2010, with home prices significantly increasing between 2011 and 2014. High housing values and prices, when combined with property tax and insurance premiums, represent high overall costs for owning a home in the area, especially for low- and moderate-income individuals and families. The FFIEC adjusted MFI was \$63,300 for 2014, down slightly from \$64,445 in 2010, and the area’s 2010 poverty level was 11 percent. Low- and moderate-income homebuyers also face the challenge of finding affordable homes when competing with investors that buy affordable housing properties with cash for resale or for rental properties.

The AA has a diverse economy with employers in communications and information technology, aerospace and engineering, agriculture and food processing, business and financial services, and medical and pharmaceutical products, and local government. Home to two Fortune 500 companies, some of the major employers in the Palm Beach AA include Tenet Healthcare Corp., NextEra Energy, Inc., Office Depot, Florida Atlantic University, and Publix Super Markets Inc. The unemployment rate within the MSA declined during the evaluation period. The annual unadjusted unemployment rate was 8.9 percent in 2012, and declined to 7.8 percent in 2013. Unemployment levels continued to decline to 6.3 percent in 2014 and 6.0 in 2015. In comparison, the annual unadjusted average unemployment rate for Florida was 8.3 percent in 2012 and 7.0 percent in 2013. Subsequent to 2013, the state's annual unemployment rate declined to 6.1 percent in 2014 and 5.5 percent in 2015.

The level of banking competition in the Palm Beach AA is high. The June 30, 2015 FDIC deposit data reflected 58 financial institutions operating 480 offices within the AA. The top five depository institutions within the AA are Wells Fargo Bank, N.A., Bank of America, N.A., JPMorgan Chase Bank, N.A., PNC Bank, N.A., and SunTrust Bank with a combined deposit market share of 60 percent. According to aggregate HMDA data from 2012 through 2014, over 600 lenders originated home loans in the AA each year. Third Federal ranked seventeenth and fifteenth in 2012 and 2013 respectively. In 2014, the bank ranked twentieth with a market share of approximately 1 percent by both loan count and by loan amount. Over the three-year period, the bank's market share also averaged approximately 1 percent based on both loan count and loan amount. The top five lenders for 2012 and 2013 in the AA included Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., Quicken Loans, Inc., Bank of America, N.A., and Citibank, N.A. In 2014, Flagstar Bank, F.S.B. replaced Citibank, N.A. as one of the top five lenders.

We contacted representatives from three local community organizations that provide assistance with affordable housing, small business and economic development in the Palm Beach AA. The representatives identified a need for financial assistance for start-up and emerging businesses, the need for financial education and counseling for small and new businesses, and a need for grants to fund administrative and operational costs of local organizations. Also identified were opportunities for first time homebuyer programs and funding, affordable housing and innovative housing programs, and opportunities to work with small and start-up businesses.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. 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 as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. CD loans to statewide or regional entities or made outside the bank’s AA may receive positive CRA consideration.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/AA. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) 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 market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 MA/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans** - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/AA.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's AA.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Institution ID: THIRD FEDERAL SAVINGS AND LOAN (90000915878)

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		CD Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Cleveland AA	84.72	12,772	1,879,483	0	0	0	0	1	300	12,773	1,879,783	91.74
Limited Review:												
Akron AA	15.28	2,303	349,772	0	0	0	0	0	0	2,303	349,772	8.26

* Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for CD Loans is from January 01, 2012 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OHIO					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Cleveland AA	3,456	86.86	5.99	0.69	14.46	3.36	42.32	31.63	37.23	64.32	1.89	9.36	42.94	45.82
Limited Review:														
Akron AA	523	13.14	5.85	0.00	20.38	5.54	36.14	19.12	37.63	75.33	2.28	14.22	37.60	45.90

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

Institution ID: THIRD FEDERAL SAVINGS AND LOAN (90000915878)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: OHIO						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Cleveland AA	233	82.04	5.99	0.43	14.46	4.29	42.32	31.76	37.23	63.52	6.45	14.44	39.85	39.26
Limited Review:														
Akron AA	51	17.96	5.85	0.00	20.38	5.88	36.14	23.53	37.63	70.59	3.75	22.08	40.21	33.96

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

Institution ID: THIRD FEDERAL SAVINGS AND LOAN (90000915878)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: OHIO				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*								
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
Cleveland AA	9,082	84.01	5.99	0.41	14.46	3.53	42.32	33.23	37.23	62.83	2.24	9.80	42.58	45.38					
Limited Review:																			
Akron AA	1,729	15.99	5.85	0.35	20.38	3.30	36.14	20.82	37.63	75.53	2.81	15.34	37.44	44.41					

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

Institution ID: THIRD FEDERAL SAVINGS AND LOAN (90000915878)

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: OHIO					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data [*]			
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ¹	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	Low	Mod	Mid	Upp
Full Review:														
Cleveland AA	3,457	86.86	22.22	3.40	17.40	12.82	20.63	21.57	39.75	62.21	8.99	25.12	24.97	40.92
Limited Review:														
Akron AA	523	13.14	21.34	3.06	17.68	10.13	21.88	21.03	39.10	65.78	10.82	23.44	24.21	41.53

^{*} Based on 2014 Peer Mortgage Data -- US and PR

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 7.4% of loans originated and purchased by BANK.

¹ Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

Institution ID: THIRD FEDERAL SAVINGS AND LOAN (90000915878)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: OHIO					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data [*]			
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	Low	Mod	Mid	Upp
Full Review:														
Cleveland AA	233	82.04	22.22	1.99	17.40	6.97	20.63	16.92	39.75	74.13	12.07	20.22	23.70	44.01
Limited Review:														
Akron AA	51	17.96	21.34	0.00	17.68	6.38	21.88	14.89	39.10	78.72	12.67	23.76	24.66	38.91

^{*} Based on 2014 Peer Mortgage Data -- US and PR

^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 12.7% of loans originated and purchased by BANK.

² Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

Institution ID: THIRD FEDERAL SAVINGS AND LOAN (90000915878)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: OHIO						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data [*]			
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ³	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	Low	Mod	Mid	Upp
Full Review:														
Cleveland AA	9,082	84.01	22.22	1.84	17.40	8.78	20.63	19.63	39.75	69.75	7.76	17.59	24.95	49.70
Limited Review:														
Akron AA	1,729	15.99	21.34	1.33	17.68	8.73	21.88	17.70	39.10	72.24	9.62	18.04	24.78	47.56

^{*} Based on 2014 Peer Mortgage Data -- US and PR

^{**} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 14.4% of loans originated and purchased by BANK.

³ Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

Institution ID: THIRD FEDERAL SAVINGS AND LOAN (90000915878)

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OHIO				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cleveland AA	0	0	303	4,044	303	4044	91.51	0	0
Limited Review:									
Akron AA	0	0	76	375	76	375	8.49	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Institution ID: THIRD FEDERAL SAVINGS AND LOAN (90000915878)

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND OPENINGS/CLOSINGS				Geography: OHIO				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cleveland AA	91.74	18	85.71	5.56	5.56	50.00	38.89	1	2	0	0	-1	0	10.87	18.11	38.62	32.40
Limited Review:																	
Akron AA	8.26	3	14.29	0.00	33.33	33.33	33.33	0	0	0	0	0	0	10.71	22.08	33.32	33.88

Institution ID: THIRD FEDERAL SAVINGS AND LOAN (90000915878)

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		CD Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Palm Beach AA	20.82	1,120	204,379	0	0	0	0	0	0	1,120	204,379	26.25
Tampa AA	37.17	2,000	339,362	0	0	0	0	0	0	2,000	339,362	40.61
Limited Review:												
Fort Lauderdale AA	12.70	683	129,544	0	0	0	0	0	0	683	129,544	9.60
Fort Myers AA	12.40	667	121,026	0	0	0	0	0	0	667	121,026	9.40
Naples AA	7.06	380	80,941	0	0	0	0	0	0	380	80,941	3.99
Sarasota AA	9.85	530	94,190	0	0	0	0	0	0	530	94,190	10.50

* Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for CD Loans is from January 01, 2012 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: THIRD FEDERAL SAVINGS AND LOAN (90000915878)

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Palm Beach AA	175	20.47	2.96	0.57	22.08	12.57	36.12	36.57	38.83	50.29	1.41	15.27	36.49	46.83
Tampa AA	318	37.19	1.93	0.00	21.38	7.86	42.13	35.22	34.56	56.92	1.00	13.57	41.23	44.21
Limited Review:														
Fort Lauderdale AA	65	7.60	1.73	0.00	27.32	23.08	37.11	38.46	33.84	38.46	1.03	19.17	39.35	40.46
Fort Myers AA	132	15.44	1.32	0.00	14.17	4.55	55.62	41.67	28.89	53.79	0.40	12.01	52.79	34.79
Naples AA	77	9.01	2.40	0.00	16.42	12.99	46.03	53.25	35.15	33.77	1.79	15.20	48.32	34.69
Sarasota AA	88	10.29	0.45	0.00	17.00	6.82	51.25	30.68	31.31	62.50	0.09	11.00	57.07	31.83

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

Institution ID: THIRD FEDERAL SAVINGS AND LOAN (90000915878)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income [*]			
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Palm Beach AA	28	22.76	2.96	0.00	22.08	7.14	36.12	46.43	38.83	46.43	2.64	17.61	32.11	47.65
Tampa AA	39	31.71	1.93	0.00	21.38	5.13	42.13	35.90	34.56	58.97	1.37	18.94	39.91	39.77
Limited Review:														
Fort Lauderdale AA	31	25.20	1.73	0.00	27.32	6.45	37.11	32.26	33.84	61.29	1.09	20.08	36.38	42.45
Fort Myers AA	10	8.13	1.32	0.00	14.17	0.00	55.62	30.00	28.89	70.00	0.71	13.01	60.43	25.85
Naples AA	4	3.25	2.40	0.00	16.42	0.00	46.03	75.00	35.15	25.00	4.78	12.35	53.39	29.48
Sarasota AA	11	8.94	0.45	0.00	17.00	0.00	51.25	63.64	31.31	36.36	0.27	19.95	52.13	27.66

^{*} Based on 2014 Peer Mortgage Data -- US and PR

^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

^{****} Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

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Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*								
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
Palm Beach AA	917	20.84	2.96	0.11	22.08	5.23	36.12	33.37	38.83	61.29	0.83	12.55	35.36	51.26					
Tampa AA	1,643	37.33	1.93	0.18	21.38	6.94	42.13	35.79	34.56	57.09	1.22	13.18	40.06	45.53					
Limited Review:																			
Fort Lauderdale AA	587	13.34	1.73	0.00	27.32	7.16	37.11	26.24	33.84	66.61	0.94	17.18	35.10	46.78					
Fort Myers AA	524	11.91	1.32	0.00	14.17	4.20	55.62	41.98	28.89	53.82	0.45	10.20	56.35	33.01					
Naples AA	299	6.79	2.40	0.00	16.42	10.70	46.03	40.47	35.15	48.83	1.42	13.05	49.69	35.84					
Sarasota AA	431	9.79	0.45	0.00	17.00	4.87	51.25	41.76	31.31	53.36	0.20	11.68	51.26	36.86					

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

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Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁴	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Palm Beach AA	175	20.47	21.50	5.99	17.84	7.19	18.93	14.97	41.73	71.86	3.97	15.67	20.11	60.25
Tampa AA	318	37.19	20.56	2.69	18.19	11.11	19.60	20.20	41.64	65.99	4.70	17.16	23.27	54.86
Limited Review:														
Fort Lauderdale AA	65	7.60	22.03	8.47	17.44	6.78	19.79	27.12	40.73	57.63	3.08	17.34	23.28	56.30
Fort Myers AA	132	15.44	18.96	1.65	18.96	5.79	21.42	20.66	40.66	71.90	5.00	17.62	20.06	57.33
Naples AA	77	9.01	21.14	1.33	18.31	9.33	19.04	24.00	41.50	65.33	2.40	11.29	15.41	70.90
Sarasota AA	88	10.29	18.22	1.14	18.66	9.09	21.32	20.46	41.80	69.31	4.11	16.16	20.38	59.36

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 6.5% of loans originated and purchased by BANK.

⁴ Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

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Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁵	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Palm Beach AA	28	22.76	21.50	3.57	17.84	14.29	18.93	21.43	41.73	60.71	8.84	16.93	18.10	56.12
Tampa AA	39	31.71	20.56	0.00	18.19	2.56	19.60	17.95	41.64	79.49	12.46	16.95	19.76	50.84
Limited Review:														
Fort Lauderdale AA	31	25.20	22.03	0.00	17.44	10.00	19.79	10.00	40.73	80.00	10.39	14.85	21.31	53.45
Fort Myers AA	10	8.13	18.96	0.00	18.96	10.00	21.42	20.00	40.66	70.00	10.61	18.44	23.46	47.49
Naples AA	4	3.25	21.14	0.00	18.31	0.00	19.04	25.00	41.50	75.00	6.87	19.31	24.03	49.79
Sarasota AA	11	8.94	18.22	0.00	18.66	27.27	21.32	9.09	41.80	63.64	10.00	18.86	19.71	51.43

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by BANK.

⁵ Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

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Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data [*]			
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ⁶	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	Low	Mod	Mid	Upp
Full Review:														
Palm Beach AA	917	20.83	21.50	.33	17.84	6.86	18.93	18.76	41.73	74.05	6.49	13.08	20.35	60.09
Tampa AA	1,643	37.32	20.56	0.84	18.19	6.08	19.60	16.50	41.64	76.57	7.37	14.38	22.63	55.62
Limited Review:														
Fort Lauderdale AA	587	13.33	22.03	1.02	17.44	4.60	19.79	13.29	40.73	81.09	6.61	13.14	20.83	59.42
Fort Myers AA	525	11.93	18.96	.57	18.96	4.76	21.42	17.91	40.66	76.76	7.84	17.85	22.07	52.24
Naples AA	299	6.79	21.14	1.08	18.31	6.14	19.04	18.05	41.50	74.73	5.30	12.68	18.89	63.13
Sarasota AA	431	9.79	18.22	1.02	18.66	8.65	21.32	19.59	41.80	70.74	7.09	16.40	22.17	54.34

^{*} Based on 2014 Peer Mortgage Data -- US and PR

^{**} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 5.5% of loans originated and purchased by BANK.

⁶ Data shown includes only 1-4 family and manufactured housing. (Property type of 1 or 2)

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Palm Beach AA	0	0	12	155	12	155	15.32	0	0
Tampa AA	0	0	216	800	216	800	79.05	0	0
Limited Review:									
Fort Lauderdale AA	0	0	6	16	6	16	1.58	0	0
Fort Myers AA	0	0	3	15	3	15	1.48	0	0
Naples AA	0	0	2	3	2	3	.30	0	0
Sarasota AA	0	0	1	5	1	5	.49	0	0
Other Investments:									
FL Statewide	0	0	3	18	3	18	1.78	0	0

* 'Prior Period Investments' means investments made in a previous 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.

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Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND OPENINGS/CLOSINGS																		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population											
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography											
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp								
Full Review:																									
Palm Beach AA	26.25	4	23.53	0.00	25.00	50.00	25.00	0	0	0	0	0	0	4.88	26.01	33.30	35.59								
Tampa AA	40.61	5	29.41	0.00	20.00	60.00	20.00	0	0	0	0	0	0	3.88	24.57	39.99	31.37								
Limited Review:																									
Fort Lauderdale AA	9.60	4	23.53	0.00	0.00	50.00	50.00	1	1	0	0	0	0	4.13	28.90	35.76	31.21								
Fort Myers AA	9.40	2	11.77	0.00	50.00	50.00	0.00	0	0	0	0	0	0	3.49	19.26	52.98	24.27								
Naples AA	3.99	1	5.88	0.00	0.00	100.0	0.00	0	0	0	0	0	0	9.05	20.27	43.40	27.27								
Sarasota AA	10.50	1	5.88	0.00	0.00	100.0	0.00	0	0	0	0	0	0	1.01	19.74	50.64	28.60								