



PUBLIC DISCLOSURE

January 26, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Savings and Loan Association of Lakewood
Charter Number 703536

14806 Detroit Ave
Lakewood, OH 44107-3910

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.

Table of Contents

OVERALL CRA RATING 2

DEFINITIONS AND COMMON ABBREVIATIONS 3

DESCRIPTION OF INSTITUTION..... 7

SCOPE OF THE EVALUATION..... 8

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW 9

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS..... 10

 LENDING TEST 10

 INVESTMENT TEST 133

 SERVICE TEST 14

APPENDIX A: SCOPE OF EXAMINATION..... A-1

APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS B-1

APPENDIX C: TABLES OF PERFORMANCE DATA C-1

Overall CRA Rating

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

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

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

*The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The geographic distribution of home mortgage loans and small loans to businesses among geographies of different income levels is good.
- The distribution of loans among individuals of different income levels and businesses of different sizes throughout the assessment area (AA) is adequate.
- The bank’s lending activity is good.
- The bank’s community development (CD) loan performance demonstrates good responsiveness to CD needs in its AA based upon its record of qualified CD loans.
- The bank’s volume of lending within its AA is adequate.
- The bank provided a good level of qualified CD investments throughout the institution’s AA that were responsive to CD needs.
- The bank’s overall performance under the service test is good. Qualified CD services provided are good, while bank delivery systems are readily accessible to the bank’s geographies and individuals of different income levels within the AA.

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/assessment area.

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: 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 assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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 one-to-four 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/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above 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: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

First Federal Savings and Loan Association of Lakewood (FFL or bank) is a full-service intrastate federal savings association headquartered in Lakewood, Ohio. It is a wholly-owned subsidiary of First Mutual Holding Company (FMHC), a two-bank holding company. Management created the holding company on August 3, 2015 to purchase smaller, well capitalized federal savings associations. FMHC acquired Belpre Savings Bank located in Belpre, OH with \$50 million in total assets in November 2016. As of December 31, 2016, FFL had total assets of \$1.63 billion and tier one capital of \$173 million. The bank has one AA consisting of the entire Cleveland-Elyria, OH MSA which includes Cuyahoga, Geauga, Lake, Lorain and Medina Counties. As of our evaluation date, the bank operated 18 full-service branch offices within the MSA. Each branch offers access to deposit-taking automated teller machines (ATMs). Additionally, 16 of the 18 branches operate drive-through services. All offices offer Saturday hours and are closed on Sundays and federal holidays. The bank also operates eight stand-alone cash dispensing only ATMs located within a local drug store chain. The bank opened one branch and closed one branch during the evaluation period. The Gordon Square branch opened in a moderate-income census tract (CT) on the west side of Cleveland during October 2014. The bank also closed the Brunswick South branch located in a middle-income CT in March 2015.

The bank offers traditional banking products and services. FFL's deposit products include checking, savings, money market accounts, and certificates of deposit. Other services also include online banking, bill pay, mobile banking and overdraft protection. Business-related deposit products and services include checking and money market accounts, certificates of deposit, interest only lawyer's trust accounts (IOLTA), merchant services, as well as remote and mobile deposit capture.

As a traditional federal savings association, the bank's primary loan products include home purchase and home refinance mortgage loans. FFL loan products include home mortgage, home equity lines of credit, home equity, construction, multi-family, business, and consumer loans. As of December 31, 2016, the bank's loan portfolio totaled \$1.34 billion, or 81.81 percent of total assets. The loan portfolio was comprised of 69.22 percent one-to-four family residential mortgages, 15.25 percent commercial real estate and land development loans, 3.38 percent multi-family, 4.51 percent home equity loans, 3.69 percent home equity lines of credit, 3.03 percent consumer loans, and less than one percent commercial and industrial loans.

As of the date of this evaluation, FFL does not have any financial, legal, or other impediments restricting its capacity to serve the community. The bank's last CRA examination dated April 29, 2013 was rated "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FFL's CRA performance within its delineated AA using CRA Large Bank full-scope procedures. This evaluation covers the period of January 1, 2012 to December 31, 2016. The procedures used to assess the bank's performance rating focused on its lending and CD activities. The evaluation period for assessing the bank's lending activity covered January 1, 2012 through December 31, 2016. Our assessment of the bank's CD lending, investments and services covered April 30, 2013 through December 31, 2016.

We evaluated FFL's lending performance based on its primary loan products of home purchase, home refinance, and small loans to businesses. Though the bank originated home improvement, multi-family, and consumer loans, they are not a primary lending focus of the bank. In addition, the bank does not offer farm loans. Therefore, we did not evaluate these loan products as part of this evaluation, as an analysis of this data would not be meaningful.

We also utilized other supporting information while evaluating the bank's CRA performance. The information included 2010 Census Data, 2016 business demographic data, internal bank records, deposit market share data and information from governmental websites regarding the characteristics and economy of the bank's AA. Furthermore, we utilized information from two recent community contacts located within the Cleveland-Elyria, OH MSA to gain an understanding of community credit needs and opportunities. The organizations primarily focus on social services to low- and moderate-income individuals, financial education, affordable housing and housing assistance. We determined that there have been opportunities for financial institutions to make CD loans and qualified investments, and to provide CD services within the AA. This is further discussed within the Market Profile section in *Appendix B*.

Data Integrity

This evaluation is based on reported loan data and qualifying CD activities. Prior to the evaluation, we tested the accuracy of the bank's reported Home Mortgage Disclosure Act (HMDA) loans and small loans to businesses and determined the information to be accurate. We also reviewed CD loans, qualified investments, and CD services to ensure that they meet the regulatory definition of CD. Some CD loans, investments, and services were excluded from consideration because they did not meet regulatory requirements for CD.

Selection of Areas for Full-Scope Review

We performed a full-scope review on FFL's single AA, the Cleveland-Elyria, OH metropolitan statistical area (MSA). Refer to *Appendix A* for additional information.

Ratings

The overall CRA performance rating for FFL is Satisfactory. In reaching our conclusion, we weighed the information from the following performance criteria: lending within the AA, lending to borrowers of different incomes and to businesses of different sizes, geographic distribution of loans and CD activities. We based our conclusions for the Lending Test on loan products

weighted according to their relative volume. As a result, home mortgage activity was weighted greater than small loans to businesses. Among the home mortgage products, purchase mortgage lending received the most weight.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices.

The OCC will consider any evidence of discriminatory or other illegal credit practices relative to this institution that other regulators may provide 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.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

FFL's performance under the lending test is rated "High Satisfactory." Based on our full-scope review, the bank's lending performance in the Cleveland-Elyria, OH MSA is good.

Lending Activity

Refer to Table 1 in *Appendix C* for the facts and data used to evaluate the bank's lending activity.

FFL's lending activity within its AA is good. The bank's overall lending volume throughout the evaluation period in the AA is commensurate with the bank's local deposit presence, especially considering that there are considerably more lenders originating or purchasing loans in the AA than there are depository institutions with branch offices. The lenders include local and non-local depository institutions, as well as non-bank financial institutions. According to the June 30, 2016 FDIC deposit market share report, there were 36 insured depository institutions operating 681 offices within the AA. The FDIC data also indicated that FFL is ranked 12th out of the 36 banks in deposit market share, holding 1.97 percent of total AA deposits. In comparison, the 2016 peer mortgage HMDA data shows FFL is ranked seventh out of 453 home mortgage lenders, with 3.93 percent market share. In addition, based on 2016 peer small business lending data, the bank was ranked 21st out of 67 lenders for small loans to businesses with less than one percent of the market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of home purchase and home refinance mortgage loans and small loans to businesses among geographies of different income levels is good. In drawing our conclusion, we placed more weight on the bank's home purchase and home refinance mortgage lending performance, given the volume of these loans in comparison to the volume of small loans to businesses originated or purchased during the evaluation period.

For comparative purposes, we considered aggregate peer geographic distribution data in the AA. In determining our ratings for each area, we gave consideration to factors detailed within *Appendix B – Market Profile of AA* section of this report that could affect the bank's ability to lend throughout each AA. These factors included competition and the CT location of the majority of the population, owner-occupied housing, and businesses.

Home Mortgage Loans

Refer to Tables 2 and 4 in *Appendix C* for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home purchase and refinance loans among geographies of different income levels is good. In determining overall geographic conclusions, we weighted home purchase and home refinance loans based on loan volume. Consequently, we gave greater consideration to home purchase loans as compared to home refinance loans.

For home purchase loans originated, FFL slightly exceeded the peer percentage in low-income geographies and was comparable with the peer percentage in moderate-income geographies. The bank's home refinance loan performance was near peer group lending averages in both low- and moderate-income CT. Overall, this demonstrates that the bank's lending is consistent with the lending patterns of peer mortgage lenders within the AA.

Small Loans to Businesses

Refer to Table 6 in *Appendix C* for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses among geographies of different income levels is excellent. FFL's percentage of small loans to businesses in low- and moderate-income geographies exceeded the percentages of peer business aggregate lending. Additionally, the bank's percentage of small loans to businesses originated or purchased exceeded the percentage of businesses located in low-income CTs, and was similar to the percentage of businesses located in moderate-income CTs. Given the lower number of loans, this analysis received less weight when determining the bank's overall geographic distribution performance rating.

Lending Gap Analysis

We analyzed FFL's home mortgage and small business lending activity reports and maps over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any conspicuous or unexplained gaps.

Inside/Outside Ratio

FFL originated or purchased an adequate percentage of loans within the bank's AA. During the evaluation period, the bank originated or purchased 54.08 percent by number and 49.27 percent by dollar amount of its total home mortgage loans within the AA. In addition, the bank originated or purchased 94.20 percent by number and 95.80 percent by dollar amount of its small loans to businesses within the AA. Overall, FFL originated or purchased 54.50 percent by number and 49.91 percent by dollar amount of its total loans within its AA.

Distribution of Loans by Income Level of the Borrower

The distribution of loans among borrowers of different income levels and businesses of different sizes throughout the AA is adequate. In drawing our conclusion, we placed more weight on home purchase and home refinance mortgage lending performance, given the volume of these loans originated during the review period. We gave consideration to the level of competition and its effect on limiting the bank's ability to lend to borrowers of different incomes and businesses of different sizes. We also considered the number of households that

live below the poverty level and the barriers that this may have on homeownership. As shown in *Appendix B*, the percentage of the population living below the poverty level is 13.36 percent. Given the median home value of \$151,321, it would be difficult for this segment of the population to afford and maintain a home. Refer to *Appendix B* for demographic and poverty rate information.

Home Mortgage Loans

Refer to Tables 8 and 10 in *Appendix C* for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home purchase and refinance loans is adequate. For both home purchase and refinance loans, FFL's lending performance was near the HMDA peer group's aggregate lending percentages to low- and moderate-income borrowers. In addition, the bank's percentage of home purchase loans made to moderate-income borrowers exceeded the percentage of families in moderate-income categories within the AA.

Small Loans to Businesses

Refer to Table 11 in *Appendix C* for the facts and data used to evaluate the borrower distribution of the bank's origination or purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good. The bank's percentage of loans to businesses with revenues of \$1 million or less exceeded the percentage of peer aggregate lending percentages to businesses that have revenues of \$1 million or less. Approximately 58.59 percent of the bank's business loans were to businesses with revenues under \$1 million compared to the peer aggregate of 45.00 percent. However, as indicated earlier, FFL has originated a small number of these loans. Consequently, performance in this area received less weight when determining the overall borrower distribution performance rating.

Community Development Lending

Refer to Table 1 Lending Volume in *Appendix C* for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. Additionally, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans; however, it does not list CD loans separately.

FFL originated a relatively high level of CD loans, which had a positive impact on its overall lending performance in the AA. In drawing our conclusion, our analysis gave consideration that FFL is a traditional federal savings association with a primary focus on residential lending. The bank actively sought out CD lending opportunities within the AA during the evaluation period, with activity consisting of 17 qualified loans, totaling approximately \$16 million. Fifteen CD loans were for multi-family rental units with rents affordable to low- and moderate-income individuals. Some of these loans also supported revitalization efforts in low- and moderate-income geographies. The other two CD loans supported community services to local alternative schools serving students primarily from low- or moderate-income families.

Product Innovation and Flexibility

The bank offers flexible lending products that meet the credit needs of low- and moderate-income individuals and geographies within the AA. For example, the bank participates in several Ohio Housing Financing Agency (OHFA) programs that facilitate affordable housing opportunities by offering funding for mortgages, as well as down payment and closing cost assistance to low- and moderate-income borrowers. The bank also continues to utilize grant funds offered through the Federal Home Loan Bank's Welcome program. FFL participates in two new programs offered through Fannie Mae and Freddie Mac, which allows down payment assistance to come from multiple sources; does not require a minimum contribution by the borrower; and does not require the borrower have a credit score.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

FFL's performance under the investment test is rated "High Satisfactory." Based on a full-scope review, the bank's performance in meeting the investment needs in the Cleveland – Elyria, OH MSA is good. Refer to Table 14 in *Appendix C* for the facts and data used to evaluate the bank's level of qualified investments.

FFL was responsive to the community development needs of its AA by making qualified investments totaling \$11.9 million during the evaluation period. As of December 31, 2016, this represented 6.88 percent of the bank's tier one capital. Current and prior period investments consist of the following:

- Two investments in Low-Income Housing Tax Credits (LIHTC) totaling \$6 million, which benefitted the larger regional area, as well as the AA. The investment in the LIHTC helped fund 73 projects throughout Ohio, Kentucky and West Virginia, providing 4,574 affordable housing units benefiting low- and moderate-income geographies or individuals. Six projects were completed in the AA, totaling 548 affordable housing units.
- Three prior-period LIHTC investments with an outstanding value of \$5,399,406. Additionally, there is a prior-period investment in a mortgage-backed security with a current value of \$257,794. Collateral for the underlying loans is single-family homes for low- and moderate-income individuals within the bank's AA. The investment helped address the affordable housing needs of the community.
- Financial grants and in-kind donations totaling \$261,364 to 20 local community organizations for CD initiatives including affordable housing, social services for low- and moderate-income individuals, and neighborhood revitalization.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory." Based on a full-scope review, the bank's performance in meeting the service needs in the Cleveland-Elyria, OH MSA is good.

Retail Banking Services

Refer to Table 15 in *Appendix C* for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

FFL's delivery systems are readily accessible to the bank's geographies and individuals of different income levels within the AA. As stated in the *Description of Institution* section, the bank operates 18 full-service branches, all with ATM machines, within the AA. FFL also offers surcharge-free access to ATMs linked with the MoneyPass ATM network, which are located throughout the AA and nationwide. Additionally, there are eight surcharge-free bank-branded, stand-alone ATMs located within a local drug store chain. During the review period, the bank opened one branch and closed one branch. The branch opening improved the accessibility of the bank's delivery systems to low- or moderate-income geographies and individuals due to its location in a moderate-income CT. FFL operates three branches within moderate-income geographies and 14 of the other 15 branches are located within five miles of low or moderate-income geographies. The bank's hours and days of operation, and available services are provided in a way that does not inconvenience any portions of the AA, including low-or moderate-income areas or individuals. Services offered are comparable among locations regardless of the income level of the geography.

The bank offers deposit products and services that assist low- and moderate-income individuals. Alternative delivery systems to further support access to financial services include several free mobile banking and personal online banking options such as mobile apps, online bill pay, and remote deposit.

Community Development Services

The bank delivers a good level of community development services. Bank employees provide technical and financial expertise to non-profit groups involved in affordable housing, social services for low- or moderate-income individuals, economic development, and financial literacy through the following activities:

- As identified in *Appendix B*, one community organization with a focus on housing outreach mentioned FFL as being their strongest partner and biggest funder.
- Bank officers and staff serve on several non-profit boards and committees that provide affordable housing or social services to low- to moderate-income individuals and geographies.

- Financial literacy programs for low- to moderate-income adults and children.
- Home buyer seminars for residents of government-subsidized housing.
- On-site banking services for two low-to moderate-income senior housing facilities.

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

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 (excludes CD Loans): 1/01/2012 to 12/31/2016 Investment and Service Tests and CD Loans: 4/30/2013 to 12/31/2016	
Financial Institution	Products Reviewed	
First Federal Savings & Loan Association of Lakewood, Lakewood, Ohio	HMDA and Small Business and Community Development Loans. Community Development Investments and Services.	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Cleveland-Elyria, OH MSA #17460	Full-Scope	Cuyahoga, Geauga, Lake, Lorain and Medina Counties

Appendix B: Market Profiles for Full-Scope Areas

Cleveland–Elyria, OH MSA

Demographic Information for Full-Scope Area: Cleveland–Elyria, OH MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs/BNAs)	636	16.35	21.23	36.16	25.47	0.79
Population by Geography	2,077,240	10.38	17.42	38.71	33.49	0.01
Owner-Occupied Housing by Geography	575,920	5.68	13.81	41.98	38.53	0.01
Businesses by Geography	129,455	7.61	12.96	38.51	40.53	0.39
Farms by Geography	3,267	2.48	8.20	44.23	45.06	0.03
Family Distribution by Income Level	535,574	21.71	17.29	20.69	40.30	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	208,889	19.45	25.53	37.15	17.86	0.01
Median Family Income	= \$62,627			Median Housing Value	= \$151,321	
HUD Adjusted Median Family Income for 2016	= \$66,600			Unemployment Rate	= 5.3 %	
Households Below the Poverty Level	= 13.36%					

Source: 2010 US Census. (*) The NA category consists of geographies that have not been assigned an income classification.

FFL’s AA consists of the entire Cleveland-Elyria, OH MSA, and is the largest MSA in Ohio. The MSA includes the counties of Cuyahoga, Geauga, Lake, Lorain, and Medina. The area offers a combination of both urban and suburban neighborhoods, as well as rural areas. Cleveland is the primary city within the AA and contains most of the AA’s low- and moderate-income CTs. The bank operates its main office within Cuyahoga County, in the city of Lakewood. The AA is comprised of contiguous geographies and does not arbitrarily exclude any low- or moderate-income areas. Based on 2010 US Census data, the bank’s AA consists of 636 CTs that include 104 low-income, 135 moderate-income, 230 middle-income, 162 upper-income and five non-designated CTs. In addition, the AA contains no designated distressed or underserved middle-income areas.

According to 2010 U.S. Census data, the AA contains approximately 18.00 percent of the state’s population. The population of the AA equated to 2,077,240 persons and 535,574 families. In addition, there are 575,920 owner-occupied households. The percentage of families in each income level within the AA are identified in the table above. In aggregate, 208,889 families in the AA are designated low- or moderate-income. The 2016 HUD Updated Median Family Income for the AA is \$66,600. Demographics also indicate that 13.36 percent of households are below the poverty level and 31.94 percent of the number of households derive income from social security or public assistance.

A majority of businesses in the AA are small. According to the 2016 Dun & Bradstreet data, 81.65 percent of businesses located in the AA have less than \$1 million in gross annual revenues and 69.64 percent of businesses have fewer than five employees. The AA has a diversified economy with major employers in various industries. The three primary business sectors within the AA include healthcare, government and financial services. Major employers include the Cleveland Clinic, University Hospital Health Systems, Progressive Corporation, U.S. Office of Personnel Management and Cuyahoga County.

The bank has better opportunities for both business and mortgage lending in the middle- and upper-income CTs within this AA. Over 80 percent of the owner-occupied housing units in the AA are in middle- and upper-income CTs. Conversely, the greatest percentages of rental and vacant households are in low- and moderate-income CTs. Furthermore, the households considered to be below the poverty level are primarily located within the low- and moderate-income CTs of the AA. Living below poverty creates a barrier for homeownership, making it especially difficult for this segment of the low-income population to afford and maintain a home. Seventy-nine percent of businesses, regardless of revenue level, are also located in middle- and upper-income tracts.

A highly competitive banking environment exists, with a mix of banks, credit unions and other finance companies serving the AA. The June 30, 2016 FDIC Deposit Market Share report identified 36 insured financial institutions with 681 offices serving the AA. The data indicates that FFL is ranked 12th in terms of deposit market share, holding 1.97% percent of the total AA deposits. Key Bank, PNC Bank, and Citizens Bank are the top three in deposit market share, with approximately half the AA's deposits. The 2016 peer mortgage HMDA data shows 453 lenders originated or purchased HMDA loans within the AA. FFL ranked seventh, with 3.93 percent of the market. The top five home loan lenders in the AA held 30.65 percent of the market share.

The AA's economy has recently begun to improve, although manufacturing growth remains sluggish. Most of the economic improvement occurred within the private services sector. The average unadjusted unemployment rate for the MSA decreased during the evaluation period from 7.4 percent in January 2013 to 5.3 percent as of December 2016, and is slightly higher than the State of Ohio rate of 4.9 percent. Though unemployment decreased, the AA's recovery continues to be hindered by a continual decrease in the AA's population.

Opportunities to make CD loans and qualified investments, as well as to provide CD services, exist within the AA. There is significant competition for involvement in these CD activities, as a large number of financial institutions operate in the AA. We considered information obtained from the bank and community organizations within the AA as part of our evaluation. During our review, we met with two organizations that focus on social services to low- and moderate-income individuals, financial education, affordable housing, housing assistance, outreach and small business development. Community and credit needs identified included general operating funding, low interest personal loans, reduced overdraft fees, secured or unsecured credit cards and small dollar loans. Additionally, community organizations state that they are interested in building a relationship with top bank management through board or committee memberships. One community organization with a focus on housing outreach mentioned FFL as being their strongest partner and biggest funder.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated 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/assessment area; (2) Partially geocoded loans (loans where no CT 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/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As ___12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- 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/assessment area. 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. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 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. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 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/assessment area. 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 (OPTIONAL) - 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/assessment area.

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 assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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.

Table 1. Lending Volume

LENDING VOLUME												Geography: CLEVELAND-ELYRIA MSA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2016	
Assessment Area: Cleveland–Elyria, OH MSA	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
FFL	100.00	12,359	2,127,739	227	56,876	0	0	17	16,062	12,603	2,200,677	100.00			

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 30, 2013 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE DECEMBER 31, 2016		Geography: CLEVELAND-ELYRIA MSA								Evaluation Period: JANUARY 1, 2012 TO				
Assessment Area: Cleveland-Elyria, OH MSA	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
FFL	8,074	100.00	5.68	2.91	13.81	7.15	41.98	35.60	38.53	54.35	1.91	9.85	43.34	44.90

* Based on 2016 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 One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: CLEVELAND-ELYRIA MSA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2016						
Assessment Area: Cleveland-Elyria, OH MSA	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
FFL	137	100.00	5.68	11.68	13.81	13.14	41.98	24.09	38.53	51.09	4.14	13.26	38.37	44.23

^{*} Based on 2016 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 One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: CLEVELAND-ELYRIA MSA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2016								
Assessment Area: Cleveland-Elyria, OH MSA	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
FFL	4,071	100.00	5.68	1.03	13.81	4.79	41.98	30.14	38.53	64.04	1.49	7.72	38.68	52.10

^{*} Based on 2016 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 One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CLEVELAND-ELYRIA MSA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2016						
Assessment Area: Cleveland-Elyria, OH MSA	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income [*]			
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{**}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	Low	Mod	Mid	Upp
FFL	77	100.00	15.05	3.90	27.16	29.87	38.98	51.95	18.81	14.29	12.98	24.52	42.31	20.19

^{*} Based on 2016 Peer Mortgage Data -- US and PR

^{**} Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

^{***} Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

^{****} Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: CLEVELAND-ELYRIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2016								
Assessment Area: Cleveland-Elyria, OH MSA	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income [*]			
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Business es ^{***}	% BANK Loans	% of Business es ^{***}	% BANK Loans	Low	Mod	Mid	Upp
FFL	227	100.00	7.61	11.45	12.96	11.89	38.51	39.21	40.53	37.45	6.14	11.31	36.30	46.25

^{*} Based on 2016 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2016).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CLEVELAND-ELYRIA MSA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2016						
Assessment Area: Cleveland-Elyria, OH MSA	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:														
FFL	8,074	100.00	21.71	6.39	17.29	20.68	20.69	23.22	40.30	49.71	9.90	24.80	24.09	41.21

* Based on 2016 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 0.2% of loans originated and purchased by BANK.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CLEVELAND-ELYRIA MSA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2016						
Assessment Area: Cleveland-Elyria, OH MSA	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
FFL	137	100.00	21.71	2.96	17.29	8.89	20.69	26.67	40.30	61.48	9.22	19.47	22.02	49.29

* Based on 2016 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 1.5% of loans originated and purchased by BANK.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: CLEVELAND-ELYRIA MSA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2016						
Assessment Area: Cleveland-Elyria, OH MSA	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
FFL	4,071	100.00	21.71	3.52	17.29	11.28	20.69	21.35	40.30	63.85	7.24	15.64	23.66	53.45

* Based on 2016 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 0.9% of loans originated and purchased by BANK.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CLEVELAND-ELYRIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2016					
Assessment Area: Cleveland-Elyria, OH MSA	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
FFL	227	100.00	81.66	58.59	46.70	20.70	32.60	38,350	17,258

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CLEVELAND-ELYRIA MSA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Cleveland-Elyria, OH MSA	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
FFL	4	5,657	22	6,261	26	11,918	100.00	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.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2012 TO DECEMBER 31, 2016								Geography: CLEVELAND-ELYRIA MSA				Evaluation Period:					
Assessment Area: Cleveland-Elyria, OH MSA	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:																	
FFL	100	18	100	0	16.67	27.78	55.55	1	1	0	+1	-1	0	10.38	17.42	38.71	33.49