



PUBLIC DISCLOSURE

January 03, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Westfield Bank, FSB
Charter Number 716697

Two Park Circle, Westfield Center, OH 44251-5001

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, nor should it 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.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The primary factors supporting these ratings are:

- The loan-to-deposit (LTD) ratio is reasonable.
- Lending in the assessment areas (AAs) is reasonable and meets the standards for satisfactory performance.
- The overall distribution of loans among individuals of different income levels and businesses of different sizes throughout the AA) is reasonable and meets the standards for satisfactory performance.
- Geographic distribution of home mortgage loans and small loans to businesses among geographies of different income levels is reasonable and meets standards for satisfactory performance.
- Community development (CD) performance, based on the record of CD loans, qualified investments, and CD services, demonstrates adequate responsiveness to CD needs in the bank's AAs.
- We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Scope of Examination

We evaluated Westfield Bank, FSB's (Westfield or bank) performance in relation to the Community Reinvestment Act (CRA) using full-scope CRA intermediate small bank procedures. The prior CRA evaluation was as of July 29, 2013, where we evaluated the bank's lending performance based on loan data from 2010 and 2011 and CD data from January 1, 2010 through July 29, 2013. The evaluation period for this examination was July 30, 2013 through December 31, 2015. Specifically, we assessed the bank's lending performance based on its lending in the AAs for calendar years 2014 and 2015. Our review period for CD lending, investments, and services was July 30, 2013 through year-end 2015. We considered activities of bank affiliates in relation to CD as described in the *Community Development Test* section of this Public Evaluation.

As described in the *Description of Institution* and the *Description of AAs* sections of this Public Evaluation, Westfield closed and opened a branch office as well as acquired Valley Savings Bank in the Summit County AA. As of our evaluation, Westfield had four AAs which are contiguous. The bank's primary AA includes Medina County and a portion of Cuyahoga County, which are part of the Cleveland-Elyria-Mentor, OH MSA. Westfield's second primary AA includes Summit County, which is part of the Akron, OH

MSA. The other two AAs include Stark County, which is part of the Canton-Massillon, OH MSA, and Wayne County, which is not part of an MSA. We selected the bank's two primary AAs for full-scope reviews, where a majority of the bank's deposits and branch offices are located. We completed limited scope reviews of the Summit and Wayne County AAs as the bank has only one branch in each AA and approximately eight percent of its deposits in aggregate within the two AAs.

The procedures used to assess Westfield's lending performance focused on the bank's primary lending products. Based on the bank's strategic plan, reports of lending activities over the review period, Reports of Condition and Income, and discussions with senior management, we determined the bank's primary areas of lending focus to be home purchase, home refinance, business, and indirect auto lending. The bank does not focus lending on home improvement or farm loans. Therefore, we did not consider home improvement or farm lending as part of the evaluation, as an analysis of these products would not be meaningful.

When determining the overall CRA performance ratings, we placed greater emphasis to the bank's lending in certain AAs and the bank's record of lending to borrowers of different incomes and businesses of different sizes. As discussed in the *Description of Institution* and *Description of AAs*, the bank's two primary markets include the Medina County and Summit County AAs, which contain a substantial majority of its branch locations, deposits, and lending activities. Additionally, the Medina County AA has no low- or moderate-income census tracts (CTs). The Wayne County AA only has one low-income CT and three moderate-income CTs. Though there are low- and moderate-income CTs located in the Summit and Stark County AAs, a significant majority of the population as well as owner-occupied housing are located within the middle- and upper-income CTs. Competition along with the lower level of populations and owner-occupied housing units in low- and moderate-income tracts, affects the bank's ability to lend in these CTs. Additionally, the bank's limited presence within the Stark County and Wayne County AAs further impacts its ability to lend within these AAs.

We also gave greater consideration for lending of certain loan products. Specifically, we placed more emphasis on home purchase and home refinance lending, as well as a secondary emphasis on business lending. Though indirect auto lending is a lending focus of the bank, the bank uses several different auto dealerships within each AA, as well as outside its AAs to underwrite and purchase auto loans. The auto dealerships deal with multiple customers without regard to the income level category of the customer or income tract level of a customer's place of residence. Additionally, auto dealers will shop multiple lenders for an approval and best offer. As a result, the bank has a limited ability to control the distribution of indirect auto loans among borrowers of different income categories and the income CT levels of the bank's AAs. Further, due to the lack of reporting for consumer loans, we are limited to comparing the bank's performance to demographic information, which hampers our ability to assess the bank's performance without understanding the performance of peer indirect auto lending.

We also utilized other supporting information while evaluating the bank's CRA performance. The information includes 2010 Census Data, bank records, deposit market share data, and information from governmental websites regarding the competition, characteristics, and economy within the bank's AAs. We also considered information derived from members of the community through community contacts with local organizations.

Prior to the examination, we tested the accuracy of the bank's reported Home Mortgage Disclosure Act (HMDA) data and determined the information to be accurate. During our evaluation, we tested the bank's business and auto lending data as well as its CD loans, investments, and services. Our evaluation is based on corrected data and qualified CD activities.

Description of Institution

Westfield is a full-service intrastate community bank headquartered in Westfield Center, Ohio. Westfield is a federal savings bank and a wholly owned subsidiary of Westfield Bancorp, Incorporated, a one-bank holding company also headquartered in Westfield Center, Ohio. Westfield Bancorp also owns Westfield Credit Corporation and Westfield Asset Management, LLC, both non-banking entities. Westfield Credit Corporation was established in September 2001 and invests primarily in commercial and premium finance loans originated by the bank. Westfield Asset Management was established in October 2013 and is an Ohio registered investment advisor, offering investment advisory services through an unaffiliated third party money manager. Westfield Bancorp is a wholly owned subsidiary of Ohio Farmers Insurance Agency. Westfield Bank also owns Westfield Mortgage Services, a mortgage service company formed in March 2004. However, based on management statements, Westfield Mortgage has not serviced any mortgage loans or had any operations since the most recent financial crisis. Thus, management considers this an inactive mortgage service company. Subsequent to the prior CRA evaluation, Westfield Bank acquired COIN Financial, Incorporated, in July 2015. COIN Financial was a non-banking indirect auto lending broker.

According to the Report of Condition and Income, the bank's assets totaled \$1.1 billion as of December 31, 2015. In the prior two calendar years of 2013 and 2014, the bank's assets totaled \$979 million and \$830 million, respectively. The bank offers traditional loan products, which include home mortgage, commercial, commercial real estate, small business, indirect auto loans, and consumer loans originated through its offices. The bank also originates some home and commercial loans that are referred through its insurance agent network and provides loans to its insurance agents located throughout the country. In addition, Westfield originates loans through indirect auto dealers located throughout Ohio as well as manufactured housing dealers that are located in Pennsylvania, West Virginia, and Kentucky.

As of December 31, 2015, commercial and commercial real estate loans represented 63 percent of the bank's loan portfolio. The remainder of the loan portfolio includes

approximately 19 percent in home loans, 17 percent in consumer loans, and 1 percent in farm loans. Westfield also sells first lien residential loans to the secondary market, which are not included as part of the bank's loan portfolio. Based on the bank's 2014 and 2015 HMDA loan application registrars, the bank sold approximately \$67 million of residential loans to secondary market investors.

Westfield's consumer deposit related products and services include checking, savings, money market accounts, certificates of deposit, individual retirement accounts, online and telephone banking, mobile banking, overdraft protection, safe deposit boxes, night depository and ATM services. Business related products and services include checking, savings, business money market accounts, cash sweep services, cash management services, merchant services, night depository, remote deposit capture, telephone, mobile and online banking. The bank also offers agency banking, which includes deposit products and services that are offered through insurance agencies. The agency banking products and services are similar to the personal and business banking products and services of the bank.

As of our evaluation, the bank operated nine branch offices. Four branch offices are located in the Medina County AA, which includes the branch office located within the vicinity of the holding company. The bank also has three branch locations within the Summit County AA, and one each located in the Stark County and Wayne County AAs. As of January 21, 2014, Westfield had closed an existing branch and opened a new branch office within 1.3 miles of each location in the Summit County AA. The relocation of the branch resulted in no change in the CT income level. Additionally, as of September 12, 2014, Westfield acquired Valley Savings Bank, which operated two offices in the Summit County AA. The closing and relocating of the branch office and acquisition of Valley Savings Bank did not increase the AA.

Excluding the branches located at Western Reserve Masonic Community (Masonic Community) and the two branch offices located in Cuyahoga Falls, all branch offices are open the same hours. The branch offices located at the Masonic Community is only open on Wednesdays from 9 am to noon. The two branches in Cuyahoga Falls are open on Saturdays. Each of the branch offices offer ATM and night depository services, except for the Masonic Community branch. Six of the bank's branch offices also offer drive-through services. The branch offices located in the Masonic Community and Wayne County AA as well as the branch located within the vicinity of the holding company do not offer drive-through services. All branches are closed Sundays and federal holidays.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the communities it serves. Westfield received a rating of "Satisfactory" at the previous CRA examination dated July 29, 2013.

Description of Assessment Areas

The bank has four AAs, which include the Medina County AA, Summit County AA, Wayne County AA, and Stark County AA. Each AA meets the requirements of the CRA. They consist of contiguous geographies, and low and moderate-income areas are not arbitrarily excluded. Each AA is described below.

Medina County AA

The Medina County AA is comprised of Medina County as well as six CTs contiguously located in Cuyahoga County. The Medina County AA is part of the Cleveland-Elyria-Mentor OH, MSA. The MSA is comprised of Cuyahoga, Geauga, Lake, Lorain, and Medina Counties. The Medina County AA consists of 43 CTs. The AA has no low- or moderate-income CTs, 19 middle-income CTs, and 24 upper-income CTs. This is the bank's primary AA, as this is where Westfield is headquartered and most of the bank's branch offices are located. Based on the June 30, 2015 FDIC Deposit Market Share report, 70.40 percent of the bank's total deposits were originated and serviced in the AA. Additionally, Westfield originated or purchased 24.92 percent of its home mortgage, business, and indirect auto loans within this AA during the evaluation period.

According to the 2010 United States (US) Census data, the combined population of the AA equated to 199,258 persons comprising 55,575 families. The Department of Housing and Urban Development's (HUD's) updated median family income (MFI) for the AA is \$66,100. Based on this information, families in the AA are 11.38 percent low-income, 13.37 percent moderate-income, 21.52 percent middle-income, and 53.73 percent upper-income. In addition, demographics indicate that 4.30 percent of the low-income families live below the poverty level and 6.60 percent of the households are below poverty level. The 2010 US Census data further reflected there were 78,122 housing units in the AA. Of these housing units, 78 percent were owner-occupied, 17 percent were rental units, and 5 percent were vacant. The median home value was \$198,016.

A majority of businesses in the AA are small as measured by the number of employees and gross revenues. According to the 2015 Dun & Bradstreet (D&B) data, 80 percent of businesses located in the AA have less than \$1 million in gross annual revenues, and 73 percent of businesses have fewer than five employees. Only 2 percent of businesses are headquartered in the AA, and 90 percent operate from a single location. The five largest employers within the AA include the Westfield Group, Medina General Hospital, Wadsworth Public Schools, Discount Drug Mart, and Wrh Health System.

The economic conditions in the Medina County AA have generally fared better than the other AAs and the State of Ohio during the period of review. Unemployment levels in 2014 for Medina and Cuyahoga Counties totaled 5.0 and 6.2 percent and decreased to 4.0 and 5.0 percent in 2015, respectively. The State of Ohio unemployment rates during 2014 and 2015 equated to 5.8 and 4.9 percent, respectively.

Competition within Medina County is high. According to the June 30, 2015 FDIC Deposit Market Share reports, there are 15 financial institutions with 53 offices serving Medina County and 26 institutions with 425 offices serving Cuyahoga County, which does not include credit unions or other financial organizations. This data indicates that Westfield is ranked thirteenth in terms of deposit market share, holding 1.15 percent of the total deposits. According to 2015 peer mortgage data, Westfield is ranked 12th out of 262 institutions lending within the AA with a 2.01 percent share of the market. The top five home and business loan lenders are large banks, which held 32 percent and 64 percent of the market share, respectively.

Summit County

The Summit County AA is comprised of Summit County, which is part of the Akron, OH MSA and includes Summit and Portage Counties. The bank operates three branch offices within Summit County. As of June 30, 2015, the branch offices held and serviced 22.41 percent of the bank's total deposits and originated or purchased 35.42 percent of the bank's home mortgage, business, and indirect auto loans during the evaluation period. Akron is the largest city in the county and contains most of the AA's low- and moderate-income CTs.

Based on 2010 US Census data, the AA consists of 135 CTs, which includes 23 low-income, 32 moderate-income, 43 middle-income, and 37 upper-income CTs. The population of the AA equated to 541,781 persons and 142,556 families. In addition, there are 155,046 owner-occupied households. Approximately 73.7 percent of the owner-occupied households are located in middle- and upper-income CTs with only 5.8 and 20.4 percent located in the low-income or moderate-income tracts, respectively. HUD estimates the updated MFI for this AA is \$66,700. Based on this information, 21.34 percent of the families in the AA are low-income; 17.68 percent are moderate-income; 21.88 percent are middle-income; and 39.10 percent are upper-income. Demographics also indicate that 10 percent of the low-income families and 13.51 percent of the households are below the poverty level. Thirty-two percent of the number of households derive their income from social security or public assistance. The median home value for the AA was \$143,155.

A majority of businesses in the AA are small. According to the 2015 D&B data, 78 percent of businesses located in the AA have less than \$1 million in gross annual revenues, and 70 percent of businesses have fewer than five employees. The five largest employers within the AA include University of Akron, Summit County, City of Akron, Akron Public Schools, and Diebold Corporation.

The Summit County AA has been experiencing improving economic conditions. As of 2014 and 2015, the unemployment rate for the AA was 5.9 percent and 4.9 percent, respectively, which were consistent with the State of Ohio unemployment rates.

Competition within Summit County is high. According to the June 30, 2015 FDIC Deposit Market Share report, there are 21 financial institutions with 163 offices serving

the Summit County AA. This does not include credit unions or other financial organizations. This data indicates that Westfield is ranked 11th in terms of deposit market share, holding 1.53 percent of the total deposits. According to 2015 peer mortgage data, Westfield is ranked 34th out of 322 institutions lending within the AA with a 0.64 percent share of the market. The top five home loan lenders include three large banks as well as two mortgage companies, which held 27.84 percent of the market. Additionally, out of 74 reporting institutions, the top business lenders held 56 percent market share.

Wayne County

The Wayne County AA is comprised of Wayne County, which is not located in an MSA. The bank has limited presence in Wayne County with one branch office located in Wooster, Ohio, the county's largest city. According to the FDIC Deposit Market Share report, the branch office held 3.79 percent of the bank's total deposits. The bank also originated or purchased 3.43 percent of its home mortgages, 5.03 percent of its business loans, and 28.14 of its indirect auto loans within the AA.

Based on 2010 US Census data, the AA consists of 32 CTs, which includes one low-income, three moderate-income, 20 middle-income, and eight upper-income tracts. The population of the AA equated to 114,520 persons and 30,246 families. Only 7.24 percent of the families are located in the low- or moderate-income tracts. Additionally, the one low-income and three moderate-income tracts contain approximately 1,783 of the 32,072 owner-occupied housing units, which equates to 5.56 of owner-occupied housing. HUD estimates the updated MFI for this AA is \$56,900. Based on this information, the families in the AA are 14.92 percent low-income, 15.94 percent moderate-income, 22.42 percent middle-income, and 46.72 percent upper-income. Demographics also indicate that 7.8 percent of the low-income families and 9.84 percent of the number of households are below the poverty level. Thirty-one percent of the number of households derive their income from social security or public assistance. The median home value for the AA was \$135,956.

A majority of businesses in the AA are small. According to the 2015 D&B data, 79 percent of businesses located in the AA have less than \$1 million in gross annual revenues, and 73 percent of businesses have fewer than five employees. The five largest employers within the AA include JM Smucker, Luk USA, College of Wooster, Wooster Community Hospital, and Wayne County.

The economic conditions within the Wayne County AA are similar to the Medina County AA. As of 2014 and 2015, the unemployment rate for the AA was at 4.6 percent and 3.9 percent, respectively, which are also better than the Ohio state unemployment rates of 5.8 and 4.9 during 2014 and 2015, respectively.

Competition within Wayne County is high. According to the June 30, 2015 FDIC Deposit Market Share report, there are 13 financial institutions with 49 offices serving the AA, which does not include credit unions or other financial organizations. This data

indicates that Westfield is ranked ninth in terms of deposit market share, holding approximately 1.6 percent of the total deposits. According to 2015 peer mortgage data, there were 168 institutions lending within the AA. The top five lenders included four large banks and one national mortgage company that held a combined market share of 32 percent. Additionally, out of 39 reporting institutions, the top business lenders held 66 percent market share.

Stark County

The Stark County AA is comprised of Stark County, which is part of the Canton-Massillon, OH MSA. The bank has a limited presence in Stark County with one branch office located in Canton, Ohio. According to the FDIC Deposit Market Share report, the branch office held 3.35 percent of the bank's total deposits. The bank also originated or purchased 27.56 percent of its home mortgage loans, 16.98 percent of its business loans, and 17.18 percent of its indirect auto loans within the AA.

Based on 2010 US Census data, the AA consists of 86 CTs, which includes eight low-income, 12 moderate-income, 46 middle-income, and 20 upper-income tracts. The population of the AA equated to 375,685 persons and 100,974 families. Only 15.66 percent of the families are located in the low- or moderate-income tracts. Additionally, the low- and moderate-income tracts contain approximately 12.94 percent of the owner-occupied housing units. HUD estimates the updated MFI for this AA is \$58,900. Based on this information, the families in the AA are 19.39 percent low-income, 18.72 percent moderate-income, 21.45 percent middle-income, and 40.44 percent upper-income. Demographics also indicate that 9.5 percent of the low-income families and 12.47 percent of the number of households are below the poverty level. Thirty-four percent of the number of households derive their income from social security or public assistance. The median home value for the AA was \$125,746.

A majority of businesses in the AA are small. According to the 2015 D&B data, 78 percent of businesses located in the AA have less than \$1 million in gross annual revenues, and 70 percent of businesses have fewer than five employees. Additionally, most businesses are located in middle- and upper-income CT. Specifically, there are 22,105 non-farm businesses located within the AA. Of the 22,105 businesses, 18,525 or 84 percent are located in middle- and upper-income tracts. The largest employers within the AA include The Timken Company, Aultman Hospital, Diebold, Inc., Mercy Medical Center, Fisher Foods, Fresh Mark, Inc., GE Capital, and Nationwide Insurance.

The economic conditions within the Stark County AA have improved. As of 2014 and 2015, the unemployment rate for the AA was at 5.8 percent and 5.3 percent, respectively. For the same time period, the Ohio state unemployment rate decreased from 5.8 to 4.9 percent.

Competition within Stark County is high. According to the June 30, 2015 FDIC Deposit Market Share report, there are 17 financial institutions with 126 offices serving the AA, which does not include credit unions or other financial organizations. This data

indicates that Westfield is ranked 13th in terms of deposit market share, holding approximately 0.43 percent of the total deposits. According to 2015 peer mortgage data, there were 256 institutions lending within the AA. The top five lenders held a combined market share of 32 percent. Additionally, out of 61 reporting institutions, the top business lenders held 53 percent market share.

Community Contacts

We conducted three community contacts during our evaluation. The three community contacts service the Medina County AA, with two of the three also servicing the Wayne County AA. In addition, we also utilized information from an existing community contact servicing Summit County AA that was conducted mid-year 2016. The focus of all four contacts is affordable housing. The purpose of the contacts was to determine the credit and CD needs in the bank's two primary AAs. Based on our community contact information, there have been opportunities to make qualifying CD loans, investments, and conduct CD services within the AAs. However, competition for involvement in CD activities is high as a large number of financial institutions operate within each of the bank's AAs. For the Medina and Wayne County AAs, each contact indicated there is a need for donations or funding to support their programs and operations. Other needs include volunteers for financial literacy programs, small dollar loans, low interest construction loans, serve on committees, and serve as a Board member. The contact that services the Summit County AA indicated there is a need for bank staff to serve as a Board member or on one of its Board committees. The Summit County AA contact also indicated there is a need for funding to support operations, funding for home building, and affordable home repair products. The three Medina County AA contacts mentioned that Westfield Bank has provided donations during the evaluation period.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's record of lending within the AAs meets the standard for satisfactory performance.

Loan-to-Deposit Ratio

The bank's LTD ratio is reasonable. We evaluated Westfield's LTD ratio for the quarterly periods between September 30, 2013 and December 31, 2015. Westfield's average LTD ratio during this period was 90.83 percent, with quarterly ratios ranging from a low of 81.94 percent to a high of 99.31 percent. There are no institutions within the AAs that are similarly situated as Westfield.

Lending in Assessment Area

Westfield's record of lending within its AAs meets the standard for satisfactory performance. Despite the majority of indirect auto loans originated or purchased

outside the AAs, the bank originated or purchased a majority of its home mortgage loans and small loans to businesses (*business loans \$1 million or less*) inside its AAs. As a result, on an aggregate basis, the bank originated or purchased a majority of its total loans both by number and dollar amount in its AAs. As shown in Table 1, Westfield originated or purchased 51.77 percent of the total number and 62.11 percent of the total dollar amount of loans inside the AA.

Table 1 - Lending in Westfield's Combined Assessment Areas 2014 - 2015										
Loan Type	Number of Loans					Dollars of Loans (000)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Mortgage	584	54.68	484	45.32	1,068	125,692	70.53	52,531	29.47	178,223
Small Loans to Businesses	377	66.96	186	33.04	563	85,506	61.29	54,012	38.71	139,518
Indirect Auto	2054	48.99	2139	51.01	4193	45,076	47.52	49,775	52.48	94,851
Totals	3,015	51.77	2,809	48.23	5,824	256,274	62.11	156,318	37.89	412,592

Source: Bank generated reports and HMDA data reported 2014 and 2015. Home Mortgage totals only include home purchase and home refinance loans originated or purchased. Small Loans to Businesses excludes business loans over \$1 million.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The distribution of loans to borrowers of different incomes and businesses of different sizes is reasonable and meets the standards for satisfactory performance.

As identified in the *Scope of Examination* section as well as below, when determining our overall performance ratings, we placed more emphasis on lending in the Medina and Summit County AAs as these are the bank's two primary markets. We also placed more emphasis on home mortgage and small loans to businesses. As identified in the *Description of AAs* section, when determining our ratings for each area, we considered the level of competition in the AAs that would affect the bank's ability to lend. In addition, we considered the number of families that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for individuals and/or families living at or below the poverty level to afford and maintain a home. As a result, the opportunity to lend to the low-income population of the AAs is limited.

Medina County

Lending to borrowers of different income levels and businesses of different sizes within the Medina County AA is reasonable and meets the standards for satisfactory performance.

The distribution of home loans to borrowers of different income levels is reasonable. As shown in Table 2, the bank's percentage of home purchase loans is near the peer mortgage aggregate percentage for low-income borrowers and significantly below the percentage of loans to moderate-income borrowers. Additionally, the bank's percentage of home refinance loans exceeds the peer aggregate percentage for low-income borrowers and is near the peer aggregate percentage for moderate-income

borrowers. Thus, Westfield’s overall performance is reasonably consistent with peer.

Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans
Home Purchase	4.59	2.08	15.94	7.64	22.99	9.72	43.24	77.08
Home Refinance	5.29	5.71	12.32	8.57	20.53	20.00	48.11	62.86
Home Improvement	7.38	3.33	15.92	23.33	20.19	20.00	52.82	50.00
Total	4.99	2.87	14.45	10.05	21.87	12.92	45.62	70.81

Source: Bank HMDA and peer mortgage aggregate data for 2014 and 2015; Total HMDA and peer loans reported without income equated to 3.35 and 13.07 percent respectively.

Westfield’s distribution of small loans to businesses reflects a reasonable distribution among businesses of different sizes within the Medina County AA. As shown in Table 3, the bank’s percentages of small loans to businesses with revenues under \$1 million by number, slightly exceeds the percentage of peer small business lending and significantly exceeds the percentage of peer small business lending by dollar amount.

Business Revenues (or Sales)	Number of Loans		Dollar of Loans	
	% Peer Small Business Data	Bank % Small Loans to Businesses	% Peer Small Business Data	Bank % Small Loans to Businesses
	#	#	\$	\$
≤\$1,000,000	45.00	46.58	30.15	46.42
>\$1,000,000	55.00	39.04	69.85	43.17
Revenues Not Available	0.00	14.38	0.00	10.41

Source: Combined 2014 and 2015 bank generated reports; Combined 2014 and 2015 Peer Small Business Data.

The distribution of indirect auto loans reflects a reasonable distribution among low- and moderate-income borrowers. As shown in Table 4, the bank’s percentage of indirect auto loans is near the percentage of AA households that are low-income and significantly exceeds the percentage of moderate-income households.

Table 4 - Borrower Distribution of Indirect Auto Loans in Medina County AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans
Indirect Auto Loans	13.44	10.58	11.92	21.41	16.01	31.49	58.63	36.52

Source: Combined 2014 and 2015 bank generated reports; 2010 U.S. Census data. Households by income below poverty level represent 6.60 percent.

Summit County

Lending to borrowers of different income levels and businesses of different sizes within the Summit County AA is reasonable and meets the standards for satisfactory performance.

The distribution of home loans to borrowers of different income levels is reasonable within the Summit County AA. As shown in Table 5, the bank’s percentage of home purchase loans is below the peer mortgage aggregate percentage for low-income borrowers. However, the bank’s percentage of home purchase loans exceeds the percentage of loans to moderate-income borrowers. Additionally, the bank’s percentage of home refinance loans is similar to the peer aggregate percentage for low-income borrowers and exceeds the peer aggregate percentage for moderate-income borrowers. Therefore, Westfield’s overall performance is reasonably consistent with peer.

Table 5 - Borrower Distribution of Residential Real Estate Loans in Summit County AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans
Home Purchase	9.96	4.52	20.50	25.16	20.31	16.77	32.88	43.23
Home Refinance	7.82	7.69	15.07	20.51	19.99	23.08	39.26	30.77
Home Improvement	12.07	0.00	19.54	0.00	21.47	0.00	39.35	0.00
Total	9.24	5.15	18.43	24.23	20.24	18.04	35.53	40.72

Source: Bank HMDA and peer mortgage aggregate data for 2014 and 2015; Total HMDA and peer loans reported without income equated to 11.86 and 16.56 percent respectively.

Westfield’s distribution of small loans to businesses reflects a reasonable distribution among businesses of different sizes within the Medina County AA. As shown in Table 6, the bank’s percentages of small loans to businesses with revenues under \$1 million by number was slightly below the percentage of peer small business lending but significantly exceeds the percentage of peer small business lending by dollar amount.

Business Revenues (or Sales)	Number of Loans		Dollar of Loans	
	% Peer Small Business Data	Bank % Small Loans to Businesses	% Peer Small Business Data	Bank % Small Loans to Businesses
	#	#	\$	\$
≤\$1,000,000	41.44	40.54	27.33	33.64
>\$1,000,000	58.56	49.32	72.67	62.50
Revenues Not Available	0.00	10.14	0.00	3.86

Source: Combined 2014 and 2015 bank generated reports; Combined 2014 and 2015 Peer Small Business Data.

The distribution of indirect auto loans reflects a reasonable distribution among low- and moderate-income borrowers. As shown in Table 7, the bank’s percentage of indirect auto loans is significantly below the percentage of AA households that are low-income. However, the bank’s indirect auto lending significantly exceeds the percentage of moderate-income households.

Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans
Indirect Auto Loans	24.48	5.79	16.10	23.97	18.16	32.23	41.26	38.02

Source: Combined 2014 and 2015 bank generated reports; 2010 U.S. Census data. Households by income below poverty level represent 13.51 percent.

Wayne County

The overall distribution of loans among borrowers of different income levels and businesses of different sizes in the Wayne County AA is inadequate. However, as of our evaluation, and as indicated in the *Scope of Evaluation and Description of AAs*, the AA has only one branch office, servicing less than four percent of the bank’s overall deposits. Therefore, the bank’s inadequate lending performance in this AA is not significant enough to affect the overall rating for the distribution of loans.

The distribution of home loans among borrowers of different income levels within the Wayne County AA is inadequate. As shown in Table 8, the bank’s percentage of home purchase and home refinance loans is significantly below the peer mortgage aggregate percentages. The primary factors affecting the bank’s ability to lend within the AA are competition, limited presence and amount of deposits serviced.

Table 8 - Borrower Distribution of Residential Real Estate Loans in Wayne County AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans
Home Purchase	5.43	0.00	21.95	6.67	23.54	73.33	32.78	13.33
Home Refinance	5.96	0.00	17.78	0.00	20.92	0.00	39.86	100.00
Home Improvement	6.73	0.00	16.14	0.00	22.42	0.00	46.19	0.00
Total	5.70	0.00	20.07	5.00	22.48	5.00	36.13	80.00

Source: Bank HMDA and peer mortgage aggregate data for 2014 and 2015; Total HMDA and peer loans reported without income equated to 10.00 and 15.63 percent, respectively.

Westfield’s distribution of small loans to businesses reflects a reasonable distribution among businesses of different sizes within the AA. As shown in Table 9, the bank’s percentages of small loans to businesses with revenues under \$1 million both by number and dollar amount exceeds the percentage of peer small business lending.

Table 9 - Borrower Distribution of Small Loans to Businesses in Wayne County AA				
Business Revenues (or Sales)	Number of Loans		Dollar of Loans	
	% Peer Small Business Data	Bank % Small Loans to Businesses	% Peer Small Business Data	Bank % Small Loans to Businesses
	#	#	\$	\$
≤\$1,000,000	45.62	47.37	26.27	38.28
>\$1,000,000	54.38	47.37	73.73	49.23
Revenues Not Available	0.00	5.26	0.00	12.49

Source: Combined 2014 and 2015 bank generated reports; Combined 2014 and 2015 Peer Small Business Data.

The distribution of indirect auto loans reflects a reasonable distribution among low- and moderate-income borrowers. As shown in Table 10, the bank’s percentage of indirect auto loans is significantly below the percentage of AA households that are low-income and significantly exceeds the percentage of moderate-income households.

Table 10 - Borrower Distribution of Indirect Auto Loans in Wayne County AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans
Indirect Auto Loans	18.32	6.92	15.66	26.47	19.24	29.41	46.78	37.21

Source: Combined 2014 and 2015 bank generated reports; 2010 U.S. Census data. Households by income below poverty level represent 9.84 percent.

Stark County

The overall distribution of loans amongst borrowers of different income levels and businesses of different sizes in the AA is inadequate. As of our evaluation, and as indicated in the *Scope of Evaluation and Description of AAs*, the Stark County AA has only one branch office, servicing less than four percent of the bank’s overall deposits. Therefore, the bank’s inadequate lending performance in this AA is not significant enough to affect the overall distribution of loans rating.

The distribution of home loans among borrowers of different income levels within the Stark County AA is inadequate. As shown in Table 11, the bank’s percentage of home purchase loans is significantly below the peer mortgage aggregate percentage for low- and moderate-income borrowers. Additionally, the bank’s percentage of home refinance loans is significantly below peer percentages for loans to low-income borrowers and moderate-income borrowers. The primary factors affecting the bank’s ability to lend in the AA are competition, limited presence, and amount of deposits serviced.

Table 11 - Borrower Distribution of Residential Real Estate Loans in Stark County AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans
Home Purchase	6.55	2.78	21.54	12.50	22.72	16.67	32.96	64.58
Home Refinance	7.28	0.00	16.73	13.33	22.37	26.67	36.43	40.00
Home Improvement	18.97	0.00	23.28	0.00	22.03	0.00	30.56	100.00
Total	7.57	2.48	19.73	12.42	22.54	17.39	34.20	61.49

Source: Bank HMDA and peer mortgage aggregate data for 2014 and 2015; Total HMDA and peer loans reported without income equated to 6.21 and 15.96 percent, respectively.

Westfield’s distribution of small loans to businesses reflects a reasonable distribution among businesses of different sizes within the Stark County AA. As shown in Table 12, the bank’s percentage of small loans to businesses with revenues under \$1 million by number is significantly below the peer small business lending; however, the bank significantly exceeds the percentage of peer small business lending by dollar amount.

Table 12 - Borrower Distribution of Small Loans to Businesses in Stark County AA				
Business Revenues (or Sales)	Number of Loans		Dollar of Loans	
	% Peer Small Business Data	Bank % Small Loans to Businesses	% Peer Small Business Data	Bank % Small Loans to Businesses
	#	#	\$	\$
≤\$1,000,000	41.58	32.81	27.20	35.92
>\$1,000,000	58.42	64.06	72.80	61.56
Revenues Not Available	0.00	3.13	0.00	2.52

Source: Combined 2014 and 2015 bank generated reports; Combined 2014 and 2015 Peer Small Business Data.

The distribution of indirect auto loans reflects a reasonable distribution among low- and moderate-income borrowers. As shown in Table 13, the bank’s percentage of indirect auto loans is significantly below the percentage of AA households that are low-income. However, the bank’s indirect auto lending significantly exceeds the percentage of moderate-income households.

Table 13 - Borrower Distribution of Indirect Auto Loans in Stark County AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans
Indirect Auto Loans	23.03	11.90	16.98	22.66	18.36	31.73	41.63	33.71

Source: Combined 2014 and 2015 bank generated reports; 2010 U.S. Census data. Households by income below poverty level represent 12.47 percent.

Geographic Distribution of Loans

The bank’s geographic distribution of loans among geographies of different income levels is reasonable and meets the standards for satisfactory performance.

As identified in the *Scope of Examination* section, when determining our overall rating we placed more emphasis on lending in the Summit County AA. We also placed more emphasis on home mortgage and business lending. In determining our ratings for each area, we gave consideration to factors detailed within the *Description of AAs* section of this report that could affect the bank’s ability to lend throughout each AA. These factors included competition as well as the number of low- and moderate-income CTs within each AA. The factors also include the bank’s presence and level of deposits serviced within each AA.

Medina County AA

The Medina County AA has no low- or moderate-income CTs. Therefore, we did not perform a geographic distribution analysis for this AA as an analysis would have not been meaningful.

Summit County AA

The geographic distribution of loans among geographies of different income levels within the Summit County AA is reasonable and meets the standards for satisfactory performance.

The geographic distribution of home loans originated or purchased by the bank in the Summit County AA is reasonable. As illustrated in Table 14, the percentage of the bank’s home purchase loans in low-income tracts is lower than the percentages of peer

mortgage aggregate data and significantly lower in moderate-income tracts. However, the bank's percentage of home refinance lending significantly exceeds the percentages of peer mortgage lending in both low- and moderate-income tracts. The primary factor affecting the bank's lending in the AA is competition.

Table 14 - Geographic Distribution of Residential Real Estate Loans in Summit County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans
Home Purchase	2.41	1.29	14.65	7.74	37.20	38.71	45.74	52.26
Home Refinance	2.76	17.95	14.18	20.51	36.88	30.77	46.18	30.77
Home Improvement	4.88	0.00	19.72	0.00	36.41	0.00	38.99	0.00
Total	2.64	4.64	14.68	10.31	37.05	37.11	45.63	47.94

Source: Bank HMDA and peer mortgage aggregate data for 2014 and 2015.

The geographic distribution of small loans to businesses among geographies of different income levels within the Summit County AA is excellent. As shown in Table 15, the percentage of the bank's small loans to businesses significantly exceeded the percentage level of peer small business loans in low-income tracts and slightly exceeded the percentage of peer small business loans in moderate-income CTs.

Table 15 - Geographic Distribution of Small Loans to Businesses in Summit County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Peer Small Business Loans	Bank % of Number of Loans	% of Peer Small Business Loans	Bank % of Number of Loans	% of Peer Small Business Loans	Bank % of Number of Loans	% of Peer Small Business Loans	Bank % of Number of Loans
Small Loans to Businesses	6.66	14.86	16.10	17.57	30.64	30.41	46.60	37.16

Source: Combined 2014 and 2015 bank generated reports; Combined 2014 and 2015 Peer Small Business Data.

The geographic distribution of indirect auto loans among geographies of different income levels within the Summit County AA is inadequate. As shown in Table 16, the percentage of the bank's indirect auto loans in comparison to the percentage of AA households is significantly less in both the low- and moderate-income CT of the AA. Though inadequate, the performance in this area is not significant to affect the overall geographic distribution rating as the bank does not have the ability to control the indirect auto loan applications it receives from auto dealerships.

Table 16 - Borrower Distribution of Indirect Auto Loans in Summit County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans
Indirect Auto Loans	10.35	2.89	23.35	18.04	34.84	41.05	31.45	38.02

Source: Combined 2014 and 2015 bank generated reports; 2010 U.S. Census data.

Wayne County AA

The geographic distribution of loans among geographies of different income levels within the Wayne County AA is inadequate and does not meet the standards for satisfactory performance. However, as of our evaluation, and indicated in the *Scope of Evaluation and Description of AAs*, the Wayne County AA has only one branch office, which services less than four percent of the bank’s overall deposits. Therefore, the bank’s inadequate lending performance in this AA is not significant enough to affect the overall rating for the distribution of loans among geographies of different income levels.

The distribution of home loans among geographies of different income levels within the Wayne County AA is inadequate. As shown in Table 17, the bank made no home loans in low- and moderate-income CTs during the evaluation period. The primary factors affecting the bank’s ability to originate home loans within these CTs include the bank’s limited presence and competition. In addition, the bank’s ability to lend in these areas is also affected by the limited number of low- and moderate-income CTs and percentages of owner-occupied housing within these CTs.

Table 17 - Geographic Distribution of Residential Real Estate Loans in Wayne County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans
Home Purchase	.36	0.00	5.54	0.00	61.72	40.00	32.38	60.00
Home Refinance	.16	0.00	4.90	0.00	63.38	80.00	31.56	20.00
Home Improvement	0.00	0.00	4.93	0.00	71.75	0.00	23.32	0.00
Total	.27	0.00	5.26	0.00	62.82	50.00	31.65	50.00

Source: Bank HMDA and peer mortgage aggregate data for 2014 and 2015.

The geographic distribution of small loans to businesses among geographies of different income levels within the Wayne County AA is reasonable. As shown in Table 18, the bank made no small loans to businesses within the one low-income tract of the AA.

However, the percentage of the bank’s small loans to businesses exceeded the percentage of peer small business loans in moderate-income tracts.

Table 18 - Geographic Distribution of Small Loans to Businesses in Wayne County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Peer Small Business Loans	Bank % of Number of Loans	% of Peer Small Business Loans	Bank % of Number of Loans	% of Peer Small Business Loans	Bank % of Number of Loans	% of Peer Small Business Loans	Bank % of Number of Loans
Small Loans to Businesses	.13	0.00	8.33	10.53	63.68	42.11	27.86	47.37

Source: Combined 2014 and 2015 bank generated reports; Combined 2014 and 2015

The geographic distribution of indirect auto loans among geographies of different income levels within the Wayne County AA is reasonable. Especially given the limited opportunities to lend in the low-income CT of AA. As shown in Table 19, the bank made no loans in the one low-income CT. However, the percentage of the bank’s indirect auto loans is near the percentage of AA households in the moderate-income CT.

Table 19 - Borrower Distribution of Indirect Auto Loans in Wayne County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans
Indirect Auto Loans	.16	0.00	8.09	5.88	62.38	67.47	29.37	26.82

Source: Combined 2014 and 2015 bank generated reports; 2010 U.S. Census data.

Stark County AA

The geographic distribution of loans among geographies of different income levels within the Stark County AA is reasonable and meets the standards for satisfactory performance. However, as of our evaluation, and indicated in the *Scope of Evaluation* and *Description of AA s*, the Stark County AA has only one branch office, which services less than four percent of the bank’s overall deposits. Therefore, the bank’s reasonable lending performance in this AA is not significant enough to affect the overall rating for the distribution of loans among geographies of different income levels.

The geographic distribution of home loans originated or purchased by the bank in the Stark County AA is reasonable. As illustrated in Table 20, the percentage of the bank’s home purchase loans in low-income tracts and its percentage of home refinance loans in moderate-income CTs exceeds the percentages of peer mortgage aggregate data. However, the bank has no home refinance loans in low-income CTs and its percentage of home purchase loans in moderate-income tracts is below the peer mortgage

aggregate percentage. The primary factors affecting the bank’s lending in the AA is competition as well as its limited presence.

Table 20 - Geographic Distribution of Residential Real Estate Loans in Stark County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans	% Peer Mortgage Aggregate Data	Bank % of Number of Loans
Home Purchase	.65	.69	4.62	.69	58.48	38.89	36.25	59.72
Home Refinance	1.19	0.00	5.93	6.67	58.57	53.33	34.31	40.00
Home Improvement	4.98	0.00	10.63	0.00	61.59	100.00	22.80	0.00
Total	1.12	.62	5.50	1.24	58.70	40.99	34.69	57.14

Source: Bank HMDA and peer mortgage aggregate data for 2014 and 2015.

The geographic distribution of small loans to businesses among geographies of different income levels within the Stark County AA is reasonable. As shown in Table 12, the bank’s percentages of small loans to businesses is below the peer small business loan percentages in both low- and moderate-income CTs. However, the bank’s ability to lend to businesses within the AA is impacted by the level of competition as well as its limited presence. In addition, as described within the *Description of AAs*, approximately 84 percent of businesses are located in middle- and upper-income CTs. Given that Westfield only originated 64 small loans to businesses during this review period within the AA, the bank would have only needed to originate three to four more small loans to businesses within each low- and moderate-income tracts to meet peer small business lending percentages.

Table 21 - Geographic Distribution of Small Loans to Businesses in Stark County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Peer Small Business Loans	Bank % of Number of Loans	% of Peer Small Business Loans	Bank % of Number of Loans	% of Peer Small Business Loans	Bank % of Number of Loans	% of Peer Small Business Loans	Bank % of Number of Loans
Small Loans to Businesses	5.76	1.56	7.12	1.56	48.79	32.81	38.33	62.50

Source: Combined 2014 and 2015 bank generated reports; Combined 2014 and 2015

The geographic distribution of indirect auto loans among geographies of different income levels within the Stark County AA is inadequate. As shown in Table 22, the percentage of the bank’s indirect auto loans is less than the percentage of AA households in the low-income CTs and significantly less than the percentage of AA households in the moderate-income CTs. Though inadequate, the performance in this area is not significant to affect the overall geographic distribution rating as the bank does not have the ability to control the indirect auto loan applications it receives from auto dealerships.

Table 22 - Borrower Distribution of Indirect Auto Loans in Stark County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans	% of AA Households	Bank % of Number of Loans
Indirect Auto Loans	5.55	2.26	12.32	4.24	55.53	64.12	26.60	29.38

Source: Combined 2014 and 2015 bank generated reports; 2010 U.S. Census data.

Responses to Complaints

The bank has not received any written complaints during the evaluation period related to its performance in meeting the credit and deposit needs of the AAs.

COMMUNITY DEVELOPMENT TEST

The bank’s overall performance under the CD test is satisfactory.

Number and Amount of Community Development Loans

Westfield’s overall performance in meeting the CD lending needs is reasonable.

Medina County

The bank’s CD lending within the Medina County AA is adequate. The bank originated four qualifying CD loans totaling slightly more than \$1 million during the evaluation period. Three loans were provided to organizations whose primary purpose was affordable housing and one organization that provides social services such as food and a safe place. The primary factor affecting the bank’s ability to originate CD loans within the AA is competition.

Summit

The bank’s CD lending within the Summit County AA is adequate. The bank originated one qualifying CD loan for \$370,000 within Summit County. The loan was provided to an entity that established low- and moderate-income housing. The primary factor affecting the bank’s ability to originate CD loans within the AA is competition.

Wayne and Stark Counties

The bank’s CD lending within the two limited markets of Wayne and Stark County is inadequate. Westfield did not originate any CD loans within either of these AAs during the period of review. As indicated in throughout this report, the bank only has one

branch office in each of the AAs, which service less than eight percent of the bank's total deposits in aggregate. Thus, the bank's inability to originate CD loans within these AAs does not impact the overall CD loan rating.

Number and Amount of Qualified Investments

The bank was responsive to the CD needs of the AAs by making or maintaining qualified investments and donations totaling approximately \$9.8 million during the evaluation period and meets the standards for satisfactory performance. In addition, Westfield Insurance Foundation, an affiliate of the bank, made \$80,698 in qualified donations within the Medina and Summit County AAs during the evaluation period.

Overall AAs and Statewide

The bank has committed to \$5 million of investments into a Small Business Investment Company Fund. As of our evaluation, the bank funded two calls for approximately \$1.5 million, which was used to provide financing to lower middle-market companies. The bank previously funded two investments totaling \$7 million in Low-Income Housing Tax Credits (LIHTC) that benefitted the AAs that are still outstanding. The investments in the LIHTC helped create and preserve approximately 3,200 affordable housing units benefiting low- and moderate-income geographies or individuals.

Medina County AA

Westfield's CD investment performance within the Medina County AA is reasonable. The bank made a prior period investment of \$1.25 million in funds to support the Senior Housing Crime Prevention Foundation, benefiting the AA as well as the statewide area. The funds were invested in a qualified CD investment, which includes a CRA Investment Fund. Additionally, the income generated from the investments help fund the crime prevention program at senior citizen facilities where a majority of the residents are low- or moderate-income.

The bank provided ten qualifying CD donations totaling \$4,825 to various local community organizations and foundations during the period of review. The donations benefitted CD initiatives for affordable housing and social services such as crisis centers and daily food and housing needs for low- and moderate-income individuals.

An affiliate of the bank also provided qualifying CD in-kind donations totaling \$31,515 to organizations during the review period. The donations primarily benefitted CD initiatives for affordable housing and a small amount for social services for low- and moderate-income individuals.

Summit County AA

Westfield's CD investment performance within the Medina County AA is reasonable. The bank invested a total of \$43,000 in a financial literacy program that benefited seven

schools within the Summit County and Stark County AAs. The program is a web-based financial literacy learning platform that will be provided to local high schools within the AAs that are primarily comprised of low- and moderate-income students. Based on the proportion of schools in each AA, we gave credit for \$33,500 to the Summit County AA.

An affiliate of the bank also provided qualifying CD in-kind donations totaling approximately \$49,183 to organizations during the review period. The donations primarily benefitted CD initiatives for affordable housing and a small amount for social services for low- and moderate-income individuals.

Stark County AA

Westfield's CD investment performance within the Medina County AA is adequate. The bank invested a total of \$43,000 in a financial literacy program that benefitted seven schools within the Summit County and Stark County AAs. The program is a web-based financial literacy learning platform that will be provided to local high schools within the AAs that are primarily comprised of low- and moderate-income students. Based on the proportion of schools in each AA, we gave credit for \$9,500 to the Stark County AA.

Westfield also donated \$25,000 in funds to the Habitat for Humanity of Stark County, which were used to fund programs as well as rehabilitate or build homes for low- and moderate-income people.

Wayne County AA

Westfield's performance for qualified CD investments or donations within the Wayne County AA is weak. During the evaluation period, Westfield did not make any investments or donations within the AA.

Extent to Which the Bank Provides Community Development Services

The bank's service performance over the evaluation period reflects an adequate level of responsiveness to CD service needs. Though Westfield provides or volunteers for several other community services within the AAs it serves, not all qualified as community development. Thus, the following represent qualifying community development services performed.

Medina, Summit, Stark and Wayne Counties

Westfield offers a full range of consumer and commercial banking products and services throughout all of its branch offices. In addition to full-service branches, the bank offers telephone, mobile, and on-line banking. Customers also have access to their accounts through the bank ATM network as well as ATMs throughout the United States that are affiliated with MoneyPass. The bank's office hours and services are provided in a manner that does not inconvenience any portions of the AA.

Medina County AA

Westfield's service performance in the Medina County AA is adequate. Four members of the bank's staff participate on the boards of local organizations, which are primarily responsible for providing services to low- and moderate-income families or individuals. For instance, bank staff members sit on the boards of organizations primarily focused on affordable housing or providing social services. In addition, one bank staff member has participated in fundraising for organizations that primary assist low- or moderate-income people.

Summit County AA

The bank's service performance in the Summit County AA is adequate. Six members of the bank's staff are members on the boards of local organizations primarily responsible for providing services to low- and moderate-income families or individuals. For instance, bank staff members sit on the boards of organizations primarily focused on affordable housing, social services, or fundraising for organizations that assist low- or moderate-income people. In addition, one bank staff member has worked on loan a committee for an organization promoting economic development.

Stark County AA

The bank's service performance in the Stark County AA is adequate. Four bank staff members are on the boards of local organizations primarily responsible for providing services to low- and moderate-income families or individuals. Specifically, bank staff members sit on the boards of organizations primarily focused on affordable housing, social services, or economic development. In addition, a bank employee has taught financial literacy for an organization providing social services and another assisted with completing financial applications at an organization supporting economic development.

Wayne County AA

The bank's service performance in the Wayne County AA is weak. No bank employees completed any qualifying community development services within the Wayne County AA during the evaluation period.

Responsiveness to Community Development Needs

The bank's CD performance is satisfactory. Responsiveness to CD needs of the AAs through CD loans, qualified investments, and qualified services is reasonable.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's or federal savings association's CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA,

or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.