



## **PUBLIC DISCLOSURE**

April 1, 2024

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

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

14806 Detroit Ave.  
Lakewood, OH 44107

Office of the Comptroller of the Currency

200 Public Square, Suite 1610  
Cleveland, OH 44144-2241

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

**Table of Contents**

Overall CRA Rating.....3  
Description of Institution..... 4  
Scope of the Evaluation.....5  
Discriminatory or Other Illegal Credit Practices Review..... 7  
State Rating.....8  
    State of Ohio.....8  
Appendix A: Scope of Examination.....A-1  
Appendix B: Summary of State Ratings.....B-1  
Appendix C: Definitions and Common Abbreviations.....C-1  
Appendix D: Tables of Performance Data.....D-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 (“FFL” or “bank”) with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- The Lending Test rating is based on the Low Satisfactory rating in Ohio. Lending levels reflect good responsiveness to assessment area (AA) credit needs. The bank demonstrated an overall adequate geographic distribution of loans and an adequate distribution of loans to borrowers of different income levels. Community Development (CD) loans had a positive impact on the overall Lending Test rating.
- The Investment Test rating is based on the Needs to Improve rating in Ohio. The bank has a poor level of qualified CD investments, donations, and grants. There were no current period investments in the AAs during the evaluation period, other than donations and grants.
- The Service Test rating is based on the High Satisfactory rating in Ohio. The service delivery systems are accessible to geographies and individuals of different income levels in the AAs. The overall level of CD services is adequate.
- The bank offered several innovative and flexible loan programs that focused on making home ownership affordable and promoting small businesses, which had a positive impact on the bank’s lending performance in Ohio. Additionally, the bank showed responsiveness to the credit needs of its borrowers during the COVID-19 pandemic by participating in the Small Business Administration’s (SBA) Paycheck Protection Program (PPP).

### Lending in Assessment Area

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

The bank originated and purchased 69.4 percent of its total loans inside the AAs during the evaluation

period. This analysis is performed at the bank, rather than the AA, level.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	4,668	67.0	2,300	33.0	6,968	1,200,424	63.0	703,567	37.0	1,903,991
Small Business	797	87.4	115	12.6	912	97,646	83.4	19,445	16.6	117,091
<b>Total</b>	<b>5,465</b>	<b>69.4</b>	<b>2,415</b>	<b>30.6</b>	<b>7,880</b>	<b>1,298,070</b>	<b>64.2</b>	<b>723,012</b>	<b>35.8</b>	<b>2,021,082</b>

*Source: Bank Data. Evaluation Period – January 1, 2021, to December 31, 2022.  
Due to rounding, totals may not equal 100.0 percent.*

## Description of Institution

FFL is a full-service intrastate bank headquartered in Lakewood, Ohio. As of December 31, 2022, total assets were \$2.5 billion, with tier 1 capital of \$236.1 million and total deposits of \$1.9 billion. It is a wholly owned subsidiary of First Mutual Holding Company (FMHC), a five-bank holding company with \$3.1 billion in consolidated assets, which is also headquartered in Lakewood, Ohio. Management created the holding company in 2015 to purchase small, well-capitalized federal savings associations. FMHC owns Blue Grass Federal Savings and Loan Association, First Mutual Bank, FSB, Martinsville First Savings Bank, and Warsaw Federal Savings and Loan Association. The bank has no affiliate activity that is considered in this evaluation. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

The bank offers traditional loan products, which include home mortgage, construction, commercial, commercial real estate, small business, home equity, and consumer loans. The bank makes loans under SBA programs to assist in meeting the needs of small businesses. As an SBA lender, the bank develops new business relationships and provides capital to businesses that would not otherwise qualify for traditional financing. Additionally, the bank participates in several innovative and flexible home mortgage products including HomeReady through Fannie Mae, Home Possible through Freddie Mac, the Ohio Housing Finance Agency (OHFA) homebuyer program, and the Federal Home Loan Bank of Cincinnati's Welcome Home program. These programs are designed to meet the needs of creditworthy low-income borrowers, including down payment assistance. Refer to the "Product Innovation and Flexibility" section under the Lending Test for more details.

As of December 31, 2022, the loan portfolio totaled \$2.1 billion, with 91.9 percent secured by real estate. Net loans represented 82 percent of total assets. The loan portfolio was comprised of 70.9 percent residential, 9.8 percent nonfarm nonresidential, 6.7 percent construction and development, 5.1 percent consumer loans, 3.9 percent commercial and industrial loans, and 3.6 percent multi-family loans. During the evaluation period, FFL sold approximately \$747.6 million home mortgage loans to the secondary market. FFL's principal lines of business are the origination of residential home mortgages and business loans.

FFL's consumer deposit related products and services include checking, savings, money market accounts, certificates of deposit, individual retirement accounts, online and mobile banking, bill pay, automated teller machine (ATM) services, and overdraft protection. Business related products and services include checking, savings, money market accounts, certificates of deposit, interest-only lawyer's

trust accounts, merchant services, remote deposit capture, and online banking. There are no material differences in services offered at the branch level.

As of this evaluation period, FFL had one rating area (state of Ohio) and two AAs. The bank's primary AA is identified as the Cleveland MSA, which includes the entire Cleveland-Elyria, OH Metropolitan Statistical Area (MSA). The second AA consists of five of the ten counties in the Columbus, OH MSA, which includes Franklin, Licking, Union, Fairfield, and Delaware Counties (Columbus MSA). During the evaluation period, the bank operated 20 branch offices, 22 ATMs, and five loan production offices (LPOs). All ATMs are full-service deposit taking machines and are at branch locations. FFL also partnered with the MoneyPass ATM network, which provides access to thousands of ATMs across the country. There are 19 branches in the Cleveland MSA and one in the Columbus MSA. All branches are open relatively the same hours and days. No branches have been opened or closed since the last CRA evaluation. However, FFL closed two LPOs since December 31, 2022, one in Amherst, Ohio and one in Brunswick, Ohio.

There are no legal, financial, or other factors impeding FFL's ability to meet the credit needs of the AAs. The bank received a "Satisfactory" rating on its previous Community Reinvestment Act (CRA) performance evaluation dated March 1, 2021.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

This performance evaluation assesses FFL's record of meeting the credit and CD needs of its entire community, including low- and moderate-income areas. The Office of the Comptroller of the Currency (OCC) used large bank CRA evaluation procedures to assess the bank's performance under the Lending, Investment, and Service Tests during the evaluation period, January 1, 2021, to December 31, 2022. For the Lending Test, the OCC evaluated all home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small business loans reported under the CRA for 2021 and 2022, as well as CD lending activities.

The Investment Test considers the bank's responsiveness to CD needs in each AA through qualified investments, grants, and donations. The OCC also considered the complexity and innovativeness of the investments, the responsiveness of the investments to CD needs, and the bank's demonstrated leadership.

The Service Test considers both retail services and CD services. For retail services, the geographic distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies along with the impact of branch openings and closings were given the most weight. Additionally, the Service Test considers the availability and effectiveness of alternative delivery systems (ADS) for delivering retail banking services including ATMs, online banking, and mobile banking. The level and responsiveness of CD services was also evaluated.

The bank's primary lending products are home mortgage and small business loans. Farm and consumer loans were not considered in this evaluation. FFL did not originate any farm loans during the evaluation period and consumer loans do not constitute a substantial majority of the bank's lending. Bank management did not request consideration of these loans.

This evaluation period included two census periods. For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census for 2021 home mortgages, the 2020 U.S. Census for 2022 home mortgages, and 2021 and 2022 Dun and Bradstreet (D&B) data for small business loans, respectively. Two sets of tables are included in Appendix D for each census period. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under the State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full-scope AAs.

FFL has two AAs in Ohio, as described in the "Description of Institution's Operations in Ohio" section of this evaluation. The OCC completed a full-scope review of both AAs.

### **Ratings**

The bank's overall CRA rating is based on its lending, investment, and service test performance within the state of Ohio. The state of Ohio rating is based on performance in both AAs, the Cleveland MSA and the Columbus MSA.

According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2022, 99.1 percent of FFL's total deposits in Ohio were in the Cleveland MSA, with only 0.9 percent in the Columbus MSA. Of the total home mortgage loan originations and purchases inside the AAs during the evaluation period, 86.5 percent and 85.4 percent were in the Cleveland MSA for 2021 and 2022, respectively. Of the total small business loan originations and purchases inside the AAs during the evaluation period, 88.2 percent and 90.6 percent were in the Cleveland MSA for 2021 and 2022, respectively. Therefore, the OCC gave more consideration to the bank's performance within the Cleveland MSA when determining the overall state rating as it represented FFL's largest market with the most deposits, lending activity, and branch distribution.

The OCC based conclusions for the Lending Test on loan products weighted in accordance with their relative volume. As a result, more weight was given to home mortgage activity than small loans to businesses.

Refer to the "Scope of the Evaluation" section under the state of Ohio section for more details regarding how the areas were weighted in arriving at the respective ratings.

### **Other Information**

Beginning in early 2020, the global economy was adversely affected by the COVID-19 pandemic, which spread worldwide and caused deteriorating economic conditions resulting from stay-at-home orders and businesses shutting down to lessen the spread and impact of the virus. FFL responded to customers facing financial hardship during the pandemic by participating in the SBA's PPP, which provided small

and mid-sized businesses impacted by the pandemic with funds to cover payroll costs and other expenses. FFL originated 708 PPP loans providing approximately \$54.9 million in critical funding to businesses.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c), 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 that require consideration in this evaluation.

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

## State Rating

### State of Ohio

**CRA rating for the State of Ohio:** Satisfactory.

**The Lending Test is rated:** Low Satisfactory.

**The Investment Test is rated:** Needs to Improve.

**The Service Test is rated:** High Satisfactory.

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs. The geographic distribution in the Cleveland MSA is adequate. The distribution of loans among borrowers of different income levels and businesses of different sizes in the Cleveland MSA is adequate. The bank originated seven CD loans during the evaluation period, having a positive impact on the overall Lending Test rating.
- FFL has a poor level of qualified CD investments, donations, and grants in the Cleveland MSA. There were no current period investments in either AA during the evaluation period, other than donations and grants.
- The service delivery systems are accessible to geographies and individuals of different income levels in the AAs. The overall level of CD services in the Cleveland MSA is adequate.
- As discussed above, the bank offered several innovative and flexible programs that focused on making home ownership affordable and promoting small businesses. These programs had a positive impact on the bank's performance.

### Description of Institution's Operations in Ohio

FFL designated two AAs in the state of Ohio. They include the entire Cleveland-Elyria, OH MSA (Cleveland MSA) and a portion of the Columbus, OH MSA (Columbus MSA). Refer to appendix A for a complete list of counties included.

#### Cleveland MSA

The Cleveland MSA includes Cuyahoga, Geauga, Lake, Lorain, and Medina counties where the bank operated 19 branches, including the main office, and 21 deposit taking ATMs. Cleveland, the largest city in the MSA, is in Cuyahoga County and contains a majority of the AA's low- and moderate-income census tracts (CTs). In 2021, the AA consisted of 638 CTs with 118 low-income, 147 moderate-income, 205 middle-income, and 156 upper-income CTs. There were also 12 CTs in the AA not assigned an income classification. In 2022, the CTs in the AA changed due to the 2020 U.S. Census data and seven CTs were removed or adjusted for a new total of 631. As of 2022, there were 89 low-income, 131 moderate-income, 213 middle-income, and 173 upper-income CTs. There were also 25 CTs in the AA that are not assigned an income classification.

The following tables provide a summary of the demographics, including housing and business information for the Cleveland MSA.



<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cleveland MSA (2021)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	638	18.5	23.0	32.1	24.5	1.9
Population by Geography	2,064,483	12.1	20.0	34.3	33.2	0.4
Housing Units by Geography	956,125	14.1	22.4	33.4	29.4	0.6
Owner-Occupied Units by Geography	552,981	6.5	16.2	37.9	39.2	0.2
Occupied Rental Units by Geography	294,627	22.5	31.0	29.2	16.0	1.2
Vacant Units by Geography	108,517	30.1	30.6	22.4	15.7	1.3
Businesses by Geography	163,063	8.6	16.8	32.6	41.0	1.0
Farms by Geography	4,034	4.0	12.1	39.7	44.0	0.1
Family Distribution by Income Level	521,209	22.8	16.7	19.3	41.2	0.0
Household Distribution by Income Level	847,608	25.9	15.3	16.6	42.2	0.0
Median Family Income MSA – 17460 Cleveland-Elyria, OH MSA		\$65,821	Median Housing Value			\$138,565
Weighted Average of FFIEC Updated MSA Median Family Income (2021) – 17460 Cleveland-Elyria, OH MSA		\$78,600	Median Gross Rent			\$761
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0%. Federal Financial Institutions Examination Council (FFIEC). (* The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cleveland MSA (2022)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	631	14.1	20.8	33.8	27.4	4.0
Population by Geography	2,088,251	9.9	18.3	36.3	34.2	1.3
Housing Units by Geography	963,209	12.2	20.6	34.9	30.3	2.0
Owner-Occupied Units by Geography	563,145	5.7	15.0	39.9	38.5	0.9
Occupied Rental Units by Geography	307,987	20.4	28.9	28.9	18.5	3.3
Vacant Units by Geography	92,077	24.7	27.4	24.7	19.4	3.8
Businesses by Geography	302,502	9.4	16.0	27.7	45.0	1.9
Farms by Geography	6,066	6.1	14.0	36.5	42.9	0.6
Family Distribution by Income Level	515,170	22.3	17.2	19.5	41.1	0.0
Household Distribution by Income Level	871,132	25.1	15.7	16.8	42.3	0.0
Median Family Income MSA – 17460 Cleveland-Elyria, OH MSA		\$76,766	Median Housing Value			\$155,178
Weighted Average of FFIEC Updated MSA Median Family Income (2022) – 17460 Cleveland-Elyria, OH MSA		\$85,400	Median Gross Rent			\$853
			Families Below Poverty Level			10.0%
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data.            Due to rounding, totals may not equal 100.0%.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the FDIC’s Summary of Deposits as of June 30, 2022, FFL had \$1.8 billion in deposits in the AA which comprised 99.1 percent of total bank deposits. FFL had 1.4 percent of the deposit market share ranking 11<sup>th</sup> among all institutions. Competition was strong with 34 total FDIC insured financial institutions operating 529 offices in the AA. The top competitors were Keybank National Association (N.A.) with 61 branches and 41.9 percent market share, Huntington National Bank with 76 branches and 11.7 percent market share, and PNC Bank, N.A. with 50 branches and 9.8 percent market share.

Competition for home mortgage and small business loans was strong in the AA. Based on the 2022 Peer Mortgage market share data (HMDA data) for the Cleveland MSA, FFL ranked 10<sup>th</sup> out of 577 lenders with a market share of 2.3 percent for home mortgage loans. The top three lenders were Third Federal

Savings and Loan with 10.2 percent market share, Huntington National Bank with 9.6 percent market share, and Fifth Third Bank, N.A. with 5.8 percent market share.

Based on the 2022 Peer Small Business loan data (CRA loan data) in the Cleveland MSA, FFL ranked 35<sup>th</sup> out of 159 lenders with a market share of 0.1 percent. The top three lenders were JPMorgan Chase Bank, N.A. with 24.1 percent market share, US Bank, N.A. with 12.3 percent market share, and Capital One, N.A. with 9.0 percent market share.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the Federal Financial Institutions Examination Council's (FFIEC) weighted average median family income in the above tables, low-income families earned less than \$39,300 in 2021 and \$42,700 in 2022, and moderate-income families earned less than \$62,880 for 2021 and \$68,320 for 2022. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$983 per month in 2021 and \$1,068 per month in 2022. A moderate-income borrower could afford a maximum payment of \$1,572 per month in 2021 and \$1,708 per month in 2022. According to 2022 Realtor.com, the median home value would result in a monthly payment of \$1,019. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the Cleveland MSA, the poverty level in 2021 was 11.6 percent with slight improvement to 10 percent in 2022 based on the 2020 U.S. Census data.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2022 U.S. Census, total rental units in the AA were 32 percent (49.3 percent in low- and moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 9.6 percent (52.1 percent in low- and moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 58.5 percent of total housing units, with only 20.7 percent in low- and moderate-income CTs.

According to 2022 D&B data, 91.2 percent of businesses located in the AA have \$1 million or less in gross annual revenues and 55.9 percent of businesses have fewer than five employees. While there is a significant volume of small businesses, 72.7 percent of these businesses are in middle- and upper-income CTs.

According to the U.S. Bureau of Labor Statistics, the 2021 and 2022 average unemployment rates across the AA were relatively consistent with the state average. Cuyahoga and Lorain counties were slightly above the state average unemployment rate which correlated with those two counties having the largest percentage of low- and moderate-income CTs to total CTs in the AA.

<b>Unemployment Rate</b>	<b>2021</b>	<b>2022</b>
Ohio	5.1	4.0
Cuyahoga	6.3	4.9
Geauga	4.1	4.0
Lake	5.0	4.3
Lorain	5.6	5.1
Medina	4.2	4.0

Based on information from the October 2022 Moody's Analytics report, economic growth within the Cleveland MSA was one step behind Ohio and the broader Midwest, and at risk. Job growth trailed that of Ohio due to below average growth in manufacturing and losses in finance, professional/business services, and construction. While the jobless rate was slightly above pre-pandemic rates, the labor force participation was near historic lows. Additional constraints on the labor market were from worsening population trends, harming consumer industries and housing. A strength in the Cleveland MSA was the world-class clinical and research health institutions maintained through the top two largest employers in the area, The Cleveland Clinic and University Hospitals.

The OCC relied on information provided from three community contacts to understand the AA's needs and opportunities. The contacts represented organizations focused on CD and affordable housing for low- and moderate-income individuals. Community contacts indicated a need for community services, affordable housing, and loans to support renovations on the aging housing supply. Many organizations use funding to support the needs of the low- and moderate-income individuals in the area; however, there is a significant need for funds to support the general operations of these organizations to provide this support to those in most need. FFL continues to be the strongest partner and largest funder for a local CD organization in Lakewood, Ohio.

### Columbus MSA

The Columbus MSA includes Union, Delaware, Licking, Franklin, and Fairfield counties where the bank operated one branch and one deposit taking ATM. Columbus is the largest city in the MSA, mainly covering areas of Franklin County and contains a majority of the AA's low- and moderate-income CTs. In 2021, the AA consisted of 389 CTs with 65 low-income, 92 moderate-income, 115 middle-income, and 114 upper-income. There were also three CTs in the AA not assigned an income classification. In 2022, the CTs in the AA changed due to the 2020 U.S. Census data with an addition of 74 CTs for a new total of 463. As of 2022, there were 60 low-income, 103 moderate-income, 149 middle-income, and 143 upper-income CTs. There were also eight CTs in the AA that were not assigned an income classification.

The following tables provide a summary of the demographics, including housing and business information for the Columbus MSA.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Columbus MSA (2021)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	389	16.7	23.7	29.6	29.3	0.8
Population by Geography	1,772,469	10.8	21.8	32.0	34.7	0.7
Housing Units by Geography	754,440	12.5	22.9	31.8	32.6	0.2
Owner-Occupied Units by Geography	411,769	5.4	17.9	34.1	42.6	0.0
Occupied Rental Units by Geography	272,518	18.8	29.4	30.2	21.2	0.5
Vacant Units by Geography	70,153	29.6	27.1	24.7	18.0	0.6
Businesses by Geography	141,974	9.6	17.4	28.5	44.0	0.5
Farms by Geography	3,835	5.5	15.0	39.6	39.8	0.1
Family Distribution by Income Level	428,850	21.9	16.7	19.2	42.1	0.0
Household Distribution by Income Level	684,287	24.0	16.2	17.1	42.7	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$163,329
Weighted Average of FFIEC Updated MSA Median Family Income (2021) – 18140 Columbus, OH MSA		\$83,900	Median Gross Rent			\$848
			Families Below Poverty Level			10.6%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i></p> <p><i>Due to rounding, totals may not equal 100.0%.</i></p> <p><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Columbus MSA (2022)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	463	13.0	22.2	32.2	30.9	1.7
Population by Geography	1,938,155	9.6	20.0	33.7	35.3	1.4
Housing Units by Geography	788,589	10.5	21.4	34.6	32.5	1.0
Owner-Occupied Units by Geography	442,430	4.7	16.2	36.9	41.9	0.3
Occupied Rental Units by Geography	290,560	17.1	28.5	32.1	20.6	1.8
Vacant Units by Geography	55,599	22.3	26.1	29.0	20.0	2.7
Businesses by Geography	270,153	8.5	16.1	30.6	43.4	1.4
Farms by Geography	5,916	5.2	15.2	36.9	42.2	0.5
Family Distribution by Income Level	458,068	21.5	17.0	20.1	41.5	0.0
Household Distribution by Income Level	732,990	23.2	16.3	18.0	42.5	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$84,088	Median Housing Value			\$202,240
Weighted Average of FFIEC Updated MSA Median Family Income (2022) – 18140 Columbus, OH MSA		\$95,600	Median Gross Rent			\$1,007
			Families Below Poverty Level			8.8%
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data            Due to rounding, totals may not equal 100.0%            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the FDIC's Summary of Deposits as of June 30, 2022, FFL had \$15.2 million in deposits in the AA which comprised less than one percent of total bank deposits. FFL had 0.02 percent of the deposit market share ranking 47<sup>th</sup> among all institutions. Competition was strong with 50 total FDIC insured financial institutions operating 427 offices in the AA. The top competitors were Huntington National Bank with 61 branches and 37.3 percent market share, JP Morgan Chase Bank, N.A. with 59 branches and 26.7 percent market share, and PNC Bank, N.A. with 39 branches and 8.1 percent market share. These three competitors accounted for over 72 percent of the deposit market share in the Columbus MSA.

Competition for home mortgage and small business loans was strong in the AA. Based on the 2022 Peer Mortgage market share data, FFL ranked 62<sup>nd</sup> out of 618 lenders with a market share of 0.4 percent for home mortgage loans. The top three lenders were Huntington National Bank with 9 percent market

share, Fifth Third Bank, N.A. with 4.4 percent market share, and Rocket Mortgage with 3.6 percent market share.

Based on the 2022 Peer Small Business loan data, FFL ranked 60<sup>th</sup> out of 165 lenders with a market share of 0.02 percent. The top three lenders were JPMorgan Chase Bank, N.A. with 34.1 percent market share, US Bank, N.A. with 12.6 percent market share, and Synchrony Bank with 8.3 percent market share.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the FFIEC's weighted average of the updated median family income in the above tables, low-income families earned less than \$41,950 in 2021 and \$47,800 in 2022, and moderate-income families earned less than \$67,120 for 2021 and \$76,480 for 2022. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$1,049 per month in 2021 and \$1,195 per month in 2022. A moderate-income borrower could afford a maximum payment of \$1,678 per month in 2021 and \$1,912 per month in 2022. According to 2022 Realtor.com, the median home value would result in a monthly payment of \$1,771. This illustrates low-income borrowers and some moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the Columbus MSA, the poverty level in 2021 was 10.6 percent with slight improvement to 8.8 percent in 2022 based on the 2020 U.S. Census data.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total rental units in the AA were 36.9 percent (45.6 percent in low- and moderate-income CTs) of available units. An additional barrier to available units is the volume of vacant units of 7.1 percent (48.4 percent in low- and moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 56.1 percent of total housing units, with only 20.9 percent in low- and moderate-income CTs.

According to 2022 D&B data, 91.4 percent of businesses located in the AA have \$1 million or less in gross annual revenues and 56.3 percent of businesses have fewer than five employees. While there is a significant volume of small businesses, 74 percent of these businesses are in middle- and upper-income CTs.

According to the U.S. Bureau of Labor Statistics, the 2021 and 2022 average unemployment rates across the AA were relatively consistent with the state average. The counties located in the AA were all below the state average unemployment rate.

<b>Unemployment Rate</b>	<b>2021</b>	<b>2022</b>
Ohio	5.1	4.0
Delaware	3.6	3.0
Fairfield	4.4	3.5
Franklin	5.0	3.4
Licking	4.1	3.4
Union	3.6	3.0

Based on information from the October 2022 Moody’s Analytics report, the Columbus MSA market recovered all pandemic-related job losses. Job gains were concentrated within transportation/utilities, consumer industries, and construction. However, the public sector remained a source of weakness and employment in administrative services declined for four consecutive quarters. The unemployment rate fell to a near-historic low of 3.1 percent in the second quarter of 2022 despite strong labor force additions. Year-over-year house price appreciation stood at a record 20.6 percent in the second quarter of 2022 and was the second strongest among all metro areas statewide. Building activity was elevated but permit issuance had settled after peaking in 2021. The Columbus MSA remained a strong competitor in the high-tech sector and remained a critical transportation hub for business throughout the country. Large employers in the AA included The Ohio State University, OhioHealth, and JPMorgan Chase & Co.

The OCC relied on information provided from four community contacts to understand the AA’s needs and opportunities. The contacts represented organizations focused on CD and affordable housing for low- and moderate-income individuals. According to one of the contacts, central Ohio is the fastest growing community in the state, with Franklin County being the most populous and Union and Delaware Counties the fastest growing. This contact also stated that affordable housing has always been a social issue but is becoming an economic development issue as well. Thousands of low-income families are on waiting lists for public housing and Section 8 voucher programs. The discussions identified affordable housing as a need in the community as well as financial education. The contacts also advised that banks in the community overall are strong partners in financial education, helping individuals to be prepared to buy homes. The contacts added that there are needs and opportunities for the purchase of low-income housing tax credits (LIHTCs), general operating support for CD organizations, and rehab loans.

## **Scope of Evaluation in Ohio**

Examiners selected both AAs for full-scope reviews. Examiners completed a full-scope review for the Cleveland MSA as it was the largest AA in Ohio in terms of deposits, branches, and lending activity. Examiners also selected the Columbus MSA to receive a full-scope review as the OCC completed a limited-scope review at the previous evaluation. Home mortgage and small business lending were evaluated under the Lending Test. As discussed above, the OCC used HMDA and CRA data for 2021 and 2022. The OCC reviewed CD loans, qualified investments, and CD services for 2021 and 2022. Refer to the “Scope of the Evaluation” section for more details.

In arriving at overall conclusions, examiners gave more consideration to the bank’s performance within the Cleveland MSA when determining the overall state rating as it represented FFL’s largest market with the most deposits, lending activity, and branch distribution. Additionally, the OCC based



conclusions for the Lending Test on loan products weighted in accordance with their relative volume. As a result, more weight was given to home mortgage activity than small loans to businesses.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

### LENDING TEST

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

#### Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Cleveland MSA was adequate.

Based on a full-scope review, the bank's performance in the Columbus MSA was poor.

#### Lending Activity

Lending levels reflect good responsiveness to AA credit needs. In drawing the overall conclusions, examiners considered the bank's operations which are focused on home mortgage and business lending. Examiners also considered the bank's market presence and competition within the AAs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cleveland MSA	4,017	705	0	7	4,729	86.4	99.1
Columbus MSA	651	92	0	0	743	13.6	0.9
<b>Total</b>	4,668	797	0	7	5,472	100.0	100.0

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

Dollar Volume of Loans (\$000s) *							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cleveland MSA	\$942,995	\$90,078	\$0	\$8,864	\$1,041,937	79.7	99.1
Columbus MSA	\$257,429	\$7,568	\$0	\$0	\$264,997	20.3	0.9
<b>Total</b>	\$1,200,424	\$97,646	\$0	\$8,864	\$1,306,934	100.0	100.0

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

#### Cleveland MSA

According to the FDIC's Summary of Deposits as of June 30, 2022, FFL ranked 11<sup>th</sup> out of 34 depository institutions (68<sup>th</sup> percentile) with a deposit market share of 1.4 percent.

Based on the 2022 HMDA market share data, FFL ranked 10<sup>th</sup> out of 577 lenders (98<sup>th</sup> percentile) with a market share of 2.3 percent for home mortgage loans. The top three lenders were Third Federal

Savings and Loan with 10.2 percent market share, Huntington National Bank with 9.6 percent market share, and Fifth Third Bank, N.A. with 5.8 percent market share.

Based on the 2022 CRA small business loan data, FFL ranked 35<sup>th</sup> out of 159 lenders (78<sup>th</sup> percentile) with a market share of 0.1 percent for small loans to businesses. The top three lenders were JP Morgan Chase Bank, N.A. with 24.1 percent market share, US Bank, N.A. with 12.3 percent market share, and Capital One, N.A. with 9 percent market share.

### Columbus MSA

According to the FDIC's Summary of Deposits as of June 30, 2022, FFL ranked 47<sup>th</sup> out of 50 depository institutions (6<sup>th</sup> percentile) with a deposit market share of 0.02 percent.

Based on the 2022 HMDA market share data, FFL ranked 62<sup>nd</sup> out of 618 lenders (90<sup>th</sup> percentile) with a market share of 0.4 percent for home mortgage loans. The top three lenders were Huntington National Bank with 9 percent market share, Fifth Third Bank, N. A. with 4.4 percent market share, and Rocket Mortgage with 3.6 percent market share.

Based on the 2022 CRA small business loan data, FFL ranked 60<sup>th</sup> out of 165 lenders (64<sup>th</sup> percentile) with a market share of 0.02 percent for small loans to businesses. The other lenders within the top three were JP Morgan Chase Bank, N.A. with 34.1 percent market share, US Bank, N.A. with 12.6 percent market share, and Synchrony Bank with 8.3 percent market share.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits an adequate geographic distribution of loans in its AAs.

#### ***Home Mortgage Loans***

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

The overall geographic distribution of home mortgage loans is adequate.

### Cleveland MSA

The OCC considered the impact of strong competition, increased housing values, and the elevated cost of home ownership. As of the 2021 HMDA market share data, the top five lenders in the market maintained a combined market share of 34.1 percent. As of the 2022 HMDA market share data, the top five lenders in the market maintained a combined market share of 35.8 percent.

According to community contact information, many units in the AA need repair, especially in low- and moderate-income areas. The contacts discussed the need for renovations of the aging housing supply in the AA. The median age of housing stock in low-income CTs was 77 years and 69 years in moderate-income CTs, as of the 2015 ACS U.S. Census. As of the 2020 U.S. Census, the median age of housing stock was 76 years for low-income and 68 years for moderate-income. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs.

*2021*

The geographic distribution of home mortgage loans was adequate given the performance context factors.

The percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and was near to the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies and below the aggregate percentage of all reporting lenders.

*2022*

The geographic distribution of home mortgage loans was adequate given the performance context factors.

The percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units located in those geographies and was near to the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders.

### Columbus MSA

Examiners considered limited lending opportunities in this AA with only 5.4 percent of the owner-occupied housing units in low-income geographies as of the 2015 ACS U.S. Census and 4.7 percent as of the 2020 U.S. Census. During the evaluation period, FFL had only one branch in the Columbus MSA, which was in a middle-income CT.

*2021*

The geographic distribution of home mortgage loans was poor.

The percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and was significantly below the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and significantly below the aggregate percentage of all reporting lenders.

*2022*

The geographic distribution of home mortgage loans was poor.

The percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was significantly below the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and was significantly below the aggregate percentage of all reporting lenders.

### ***Small Loans to Businesses***

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

The overall geographic distribution of small loans to businesses is good.

#### Cleveland MSA

In determining conclusions, examiners gave consideration for opportunities to lend based the level of competition and the number of businesses located in low- and moderate-income tracts in the AAs. Based on the 2021 Peer Small Business loan data, the top three lenders accounted for approximately 40 percent of the total small business market share and are much larger financial institutions.

*2021*

The geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses in low-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses located in those geographies and was near to the aggregate percentage of all reporting lenders.

*2022*

The geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

#### Columbus MSA

*2021*

The geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses located in those geographies and was significantly below the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

2022

The bank did not make enough small loans to businesses during the evaluation period in 2022 to perform a meaningful analysis.

### ***Lending Gap Analysis***

The OCC reviewed summary reports and maps and analyzed FFL's home mortgage loans and small loans to businesses over the evaluation period to identify any gaps in the geographic distribution of loan activity. Examiners did not identify any unexplained conspicuous gaps.

### **Distribution of Loans by Income Level of the Borrower**

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

### ***Home Mortgage Loans***

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

The distribution of home mortgage loans among individuals of different income levels is adequate. Examiners considered affordability constraints, including the percentage of families living below the poverty level, and the barriers these create for families to qualify for home mortgage financing.

### **Cleveland MSA**

2021

The distribution of home mortgage loans among individuals of different income levels was adequate.

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of those families and was well below the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of those families and was below the aggregate percentage of all reporting lenders.

2022

The distribution of home mortgage loans among individuals of different income levels was adequate.

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of those families and was well below the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of those families and was below the aggregate percentage of all reporting lenders.

### Columbus MSA

#### *2021*

The distribution of home mortgage loans among individuals of different income levels was very poor.

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of those families and was significantly below the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans to moderate-income borrowers was significantly below the percentage of those families and was significantly below the aggregate percentage of all reporting lenders.

#### *2022*

The distribution of home mortgage loans among individuals of different income levels was very poor.

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of those families and was significantly below the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans to moderate-income borrowers was significantly below the percentage of those families and was significantly below the aggregate percentage of all reporting lenders.

### ***Small Loans to Businesses***

Refer to Table R in appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of the bank's small loans to businesses is overall adequate based on FFL's 2021 performance. A majority of the small loans to businesses originated or purchased during the evaluation period were made in 2021.

In determining the conclusions, examiners gave consideration for opportunities to lend based on the level of competition and the number of non-farm businesses located within the AA. Additionally, it was noted that 90 percent of small loans to businesses made in the bank's Cleveland MSA did not provide business revenues for 2021. This was mainly due to these loans being part of the SBA's PPP loan program during the COVID-19 pandemic, which did not require borrowers to provide this information as part of the loan process. FFL was responsive to the SBA's PPP and originated a significant volume of PPP loans in 2021. Most of these loans, 81 percent, were under \$100,000, which were to support small businesses in the bank's lending areas.

## Cleveland MSA

*2021*

The distribution of the bank's small loans to businesses was overall good based on performance context considerations.

The percentage of small loans to businesses with revenues of \$1 million or less was significantly below the percentage of businesses with revenues of \$1 million or less and was significantly below the aggregate percentage of all reporting lenders.

As discussed above, the bank was particularly responsive to the SBA's PPP and originated a significant volume of PPP loans in 2021 that did not require the borrowers to provide gross revenue information. Of the 618 small business loan originations, 548 were SBA PPP loans. Of the other 70 small business loan originations, 48.6 percent were originated to borrowers with gross annual revenues of \$1 million or less, which is commensurate with aggregate CRA loan data (49 percent).

*2022*

The distribution of the bank's small loans to businesses was poor.

The percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less and was well below the aggregate percentage of all reporting lenders.

## Columbus MSA

*2021*

The distribution of the bank's small loans to businesses was adequate.

The percentage of small loans to businesses with revenues of \$1 million or less was significantly below the percentage of businesses with revenues of \$1 million or less and significantly below the aggregate percentage of all reporting lenders.

As discussed above, the bank was particularly responsive to the SBA's PPP and originated a significant volume of PPP loans in 2021 that did not require the borrowers to provide gross revenue information. Of the 83 small business loan originations, 74 were SBA PPP loans. Of the other nine small business loan originations, 33.3 percent were originated to borrowers with gross annual revenues of \$1 million or less.

*2022*

The OCC did not evaluate 2022 small loans to businesses in the Columbus MSA, as there were not enough loans in the AA to conduct a meaningful analysis.

## **Community Development Lending**

The institution has made an adequate level of CD loans.

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

### Cleveland MSA

During the evaluation period, FFL made an adequate level of CD loans. FFL originated seven qualifying CD loans totaling \$8.9 million which represented 3.8 percent of allocated tier 1 capital, based on total deposits as of June 30, 2022.

When drawing the conclusions, examiners considered the level of competition for CD loans within the bank's AA from larger banks and the overall economic conditions impacting the bank's ability to generate CD loans. Below are the details regarding the bank's CD loans:

- Five SBA PPP loans totaling \$7 million that supported area businesses during the COVID-19 pandemic.
- A \$1.1 million real estate loan to a non-profit social service agency serving low- and moderate-income families.
- A \$700,000 real estate loan for improvements to a 35-unit multifamily housing project for low- and moderate-income individuals.

### Columbus MSA

During the evaluation period, FFL did not make any CD loans in the Columbus MSA.

## **Product Innovation and Flexibility**

### Cleveland MSA

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. As discussed above, the bank participates in several innovative and flexible home mortgage products including HomeReady through Fannie Mae, Home Possible through Freddie Mac, the OHFA homebuyer program, and the Federal Home Loan Bank of Cincinnati's Welcome Home program. During the evaluation period, the bank made 168 loans among these programs in the Cleveland MSA. These loans included 86 loans through HomeReady, 57 loans through Home Possible, seven loans through OFHA, and 18 loans through Welcome Home.

### Columbus MSA

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, the bank made two loans through the HomeReady loan program offered through Fannie Mae in the Columbus MSA.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in Ohio is rated Needs to Improve.

## **Conclusions for Areas Receiving Full-Scope Reviews**



Based on a full-scope review, the bank's performance in the Cleveland MSA was poor.

Based on a full-scope review, the bank's performance in the Columbus MSA was very poor.

Assessment Area	Qualified Investments									
	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cleveland MSA	1	81	67	341	68	88.3	422	4.0	0	0
Columbus MSA	0	0	0	0	0	0.0	0	0.0	0	0
Statewide/ Regional with Direct Benefit to AAs	6	3,992	3	6,070	9	11.7	10,062	96.0	0	0
<b>Total</b>	<b>7</b>	<b>4,073</b>	<b>70</b>	<b>6,411</b>	<b>77</b>	<b>100.0</b>	<b>10,484</b>	<b>100.0</b>	<b>0</b>	<b>0</b>

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

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

### Cleveland MSA

FFL had a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, FFL made 67 qualifying grants and donations to 45 different organizations totaling \$341,000. The bank provided \$90,000 in donations to a local community organization who supports low- and moderate-income individuals as well as affordable housing needs in the area. Also, FFL provided a \$50,000 donation to an organization which supports housing for low- and moderate-income families. The dollar volume of current- and prior-period investments represented 0.2 percent of tier 1 capital allocated to the AA.

The bank exhibited poor responsiveness to credit and community economic development needs. FFL rarely uses innovative and/or complex investments to support CD initiatives.

### Columbus MSA

The institution had few, if any, qualified CD investments or grants, particularly those that are not routinely provided by private investors.

During the evaluation period, FFL made no qualified CD investments, grants, and donations. The bank exhibited very poor responsiveness to credit and community economic development needs. The bank did not use innovative and/or complex investments to support CD initiatives.

### Statewide/Regional

FFL purchased three statewide collateralized mortgage obligations in 2022 totaling \$6.1 million which directly benefited the Cleveland and Columbus MSAs. Collateral for the underlying loans were multifamily affordable housing units and health care facilities located in low- and moderate-income

CTs. The bank also invested in six prior period Low-Income Housing Tax Credit investments with an outstanding balance of almost \$4 million as of December 31, 2022.

**SERVICE TEST**

The bank’s performance under the Service Test in Ohio is rated High Satisfactory.

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank’s performance in the Cleveland MSA was good.

Based on a full-scope review, the bank’s performance in the Columbus MSA was adequate.

**Retail Banking Services**

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

Distribution of Branch Delivery System - 2021												
Assessment Area	Deposits	Branches							Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography			
				Low	Mod	Mid	Upp	N/A	Low	Mod	Mid	Upp
Cleveland MSA	99.4	19	95.0	0.0	15.8	26.3	52.6	5.3	12.1	20.0	34.3	33.2
Columbus MSA	0.6	1	5.0	0.0	0.0	100.0	0.0	0.0	10.8	21.8	32.0	34.7

Distribution of Branch Delivery System - 2022												
Assessment Area	Deposits	Branches							Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Cleveland MSA	99.1	19	95.0	5.3	10.5	36.8	47.4	9.9	18.3	36.3	34.2	
Columbus MSA	0.9	1	5.0	0.0	0.0	100.0	0.0	9.6	20.0	33.7	35.3	

Cleveland MSA

The bank’s branch distribution in low- and moderate- income geographies was below the percentage of the population living within those geographies. However, most of those tracts were located between several branches that were reasonably accessible. Additionally, two branches were located in middle- and upper- income tracts adjacent to low- and moderate- income CTs. One branch in a CT with an unknown income level in 2021 changed to a low-income tract in 2022. All branches had at least one full-service deposit taking ATM. Alternate delivery systems included online banking and bill pay as well as mobile banking.

Columbus MSA

The bank had a limited market share and just one branch location in the Columbus MSA. The branch was in a middle-income CT in Franklin County, which included most of the low- and moderate-income tracts in the Columbus MSA. This branch was reasonably accessible to the rest of the county. The branch also had an ATM, and customers in the Columbus MSA had access to FFL's online and mobile banking services.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp
	Cleveland MSA	0	0	0	0	0
Columbus MSA	0	0	0	0	0	0

The bank did not open or close any branches during the evaluation period. Services and business hours did not vary in a way that inconvenienced its AAs, particularly low- and moderate-income geographies and/or individuals. FFL offered traditional banking products and services at all branch locations in the AAs. All branches in the Cleveland MSA had the same hours except for the one branch located in a low-income CT, which remains open an hour later than the others on Monday through Thursday.

**Community Development Services**

The institution provided an adequate level of CD services.

Cleveland MSA

During the evaluation period, FFL employees provided 257 service activities totaling 629 hours to 35 organizations in the Cleveland MSA. The bank's services were responsive to identified needs in the AA of affordable housing, community services, financial literacy, and economic development.

Examples of CD services in the AA include:

- One employee served as treasurer of a local organization that serves children and young adults within or impacted by the foster care system, providing 260 service hours during the evaluation period.
- One employee served on the board and committees of a local organization that supports and develops neighborhoods and affordable housing focused on low- and moderate-income individuals and communities, providing 12 service hours during the evaluation period.
- Four employees conducted career readiness and financial literacy classes for a local organization that supports the workforce readiness and economic success of low- and moderate-income students, providing 24 service hours during the evaluation period.

Columbus MSA

FFL provided no CRA eligible CD services in the Columbus MSA during the evaluation period. However, the bank's branch presence and market share in this area remain limited.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2021 – 12/31/2022	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans Community development loans, qualified investments, and community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not applicable	Not applicable	Not applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Ohio</b>		
Cleveland MSA	Full-scope	Cleveland-Elyria, OH MSA 17460
Columbus MSA	Full-scope	Portions of the Columbus, OH MSA 18140 (Franklin, Licking, Union, Fairfield, and Delaware Counties)

## Appendix B: Summary of State Ratings

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RATINGS: First Federal Savings and Loan Association of Lakewood				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
First Federal Savings and Loan Association of Lakewood	Low Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
State:				
Ohio	Low Satisfactory	Needs to Improve	High Satisfactory	Satisfactory

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

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

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

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) 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. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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

## State of Ohio

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2021</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Cleveland MSA	2,467	567,665	86.5	101,668	6.5	3.0	3.5	16.2	9.1	13.2	37.9	34.5	37.9	39.2	53.3	45.4	0.2	0.0	0.0	
Columbus MSA	386	148,177	13.5	117,046	5.4	1.3	5.1	17.9	4.9	15.6	34.1	28.2	31.1	42.6	65.5	48.2	0.0	0.0	0.0	
<b>Total</b>	<b>2,853</b>	<b>715,842</b>	<b>100.0</b>	<b>218,714</b>	<b>6.0</b>	<b>2.8</b>	<b>4.4</b>	<b>17.0</b>	<b>8.6</b>	<b>14.5</b>	<b>36.3</b>	<b>33.7</b>	<b>34.2</b>	<b>40.7</b>	<b>54.9</b>	<b>46.9</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.

FFL excluded from Aggregate Data.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cleveland MSA	1,550	375,330	85.4	65,142	5.7	3.6	4.5	15.0	8.9	14.2	39.9	31.9	41.0	38.5	55.2	39.8	0.9	0.4	0.5
Columbus MSA	265	109,252	14.6	68,285	4.7	2.6	5.8	16.2	6.0	15.3	36.9	28.7	36.1	41.9	62.3	42.4	0.3	0.4	0.5
<b>Total</b>	<b>1,815</b>	<b>484,582</b>	<b>100.0</b>	<b>133,427</b>	<b>5.3</b>	<b>3.5</b>	<b>5.2</b>	<b>15.5</b>	<b>8.5</b>	<b>14.8</b>	<b>38.6</b>	<b>31.5</b>	<b>38.5</b>	<b>40.0</b>	<b>56.2</b>	<b>41.1</b>	<b>0.6</b>	<b>0.4</b>	<b>0.5</b>
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data.            Due to rounding, totals may not equal 100.0%.            FFL excluded from Aggregate Data.</i>																			

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland MSA	2,467	567,665	86.5	101,668	22.8	5.3	8.8	16.7	15.6	19.1	19.3	24.0	21.6	41.2	54.1	35.8	0.0	1.1	14.7
Columbus MSA	386	148,177	13.5	117,046	21.9	0.8	7.0	16.7	5.4	18.0	19.2	12.4	20.1	42.1	76.7	38.4	0.0	4.7	16.6
<b>Total</b>	<b>2,853</b>	<b>715,842</b>	<b>100.0</b>	<b>218,714</b>	<b>22.4</b>	<b>4.7</b>	<b>7.8</b>	<b>16.7</b>	<b>14.2</b>	<b>18.5</b>	<b>19.3</b>	<b>22.4</b>	<b>20.8</b>	<b>41.6</b>	<b>57.1</b>	<b>37.2</b>	<b>0.0</b>	<b>1.6</b>	<b>15.7</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

FFL excluded from Aggregate Data.

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2022</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland MSA	1,550	375,330	85.4	65,142	22.3	5.5	9.9	17.2	14.5	21.4	19.5	20.6	21.2	41.1	56.8	33.1	0.0	2.6	14.5
Columbus MSA	265	109,252	14.6	68,285	21.5	1.5	8.5	17.0	5.3	19.3	20.1	11.7	21.2	41.5	73.2	35.6	0.0	8.3	15.4
<b>Total</b>	<b>1,815</b>	<b>484,582</b>	<b>100.0</b>	<b>133,427</b>	<b>21.9</b>	<b>4.9</b>	<b>9.2</b>	<b>17.1</b>	<b>13.1</b>	<b>20.3</b>	<b>19.7</b>	<b>19.3</b>	<b>21.2</b>	<b>41.3</b>	<b>59.2</b>	<b>34.4</b>	<b>0.0</b>	<b>3.5</b>	<b>14.9</b>
<p>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data.  Due to rounding, totals may not equal 100.0%.</p> <p>FFL excluded from Aggregate Data.</p>																			



**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cleveland MSA	618	61,190	88.2	52,340	8.6	5.7	8.3	16.8	14.4	17.0	32.6	33.7	31.4	41.0	45.5	42.3	1.0	0.8	1.1
Columbus MSA	83	4,517	11.8	44,322	9.6	3.6	8.7	17.4	24.1	16.1	28.5	28.9	26.7	44.0	42.2	47.9	0.5	1.2	0.5
<b>Total</b>	<b>701</b>	<b>65,707</b>	<b>100.0</b>	<b>96,662</b>	<b>9.0</b>	<b>5.4</b>	<b>8.5</b>	<b>17.1</b>	<b>15.5</b>	<b>16.5</b>	<b>30.7</b>	<b>33.1</b>	<b>29.3</b>	<b>42.4</b>	<b>45.1</b>	<b>44.9</b>	<b>0.8</b>	<b>0.9</b>	<b>0.8</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0%

FFL excluded from Aggregate Data.

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2022**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cleveland MSA	87	28,888	90.6	46,637	9.4	10.3	7.3	16.0	13.8	14.6	27.7	18.4	31.0	45.0	56.3	45.3	1.9	1.1	1.7
Columbus MSA	9	3,051	9.4	43,471	8.5	22.2	7.2	16.1	11.1	14.4	30.6	33.3	31.6	43.4	33.3	45.6	1.4	0.0	1.1
<b>Total</b>	<b>96</b>	<b>31,939</b>	<b>100.0</b>	<b>90,108</b>	<b>9.0</b>	<b>11.5</b>	<b>7.3</b>	<b>16.1</b>	<b>13.5</b>	<b>14.5</b>	<b>29.1</b>	<b>19.8</b>	<b>31.3</b>	<b>44.3</b>	<b>54.2</b>	<b>45.5</b>	<b>1.7</b>	<b>1.0</b>	<b>1.4</b>

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

FFL excluded from Aggregate Data.

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cleveland MSA	618	61,190	88.2	52,340	83.9	5.5	49.0	6.0	4.5	10.2	90.0	
Columbus MSA	83	4,517	11.8	44,322	84.0	3.6	45.6	4.9	1.2	11.1	95.2	
<b>Total</b>	<b>701</b>	<b>65,707</b>	<b>100.0</b>	<b>96,662</b>	<b>83.9</b>	<b>5.3</b>	<b>47.4</b>	<b>5.5</b>	<b>4.1</b>	<b>10.6</b>	<b>90.6</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.            Due to rounding, totals may not equal 100.0%</i>												
<i>FFL excluded from Aggregate Data.</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2022</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cleveland MSA	87	28,888	90.6	46,637	91.2	27.6	50.6	3.1	57.5	5.7	14.9	
Columbus MSA	9	3,051	9.4	43,471	91.4	44.4	52.5	2.5	22.2	6.1	33.3	
<b>Total</b>	<b>96</b>	<b>31,939</b>	<b>100.0</b>	<b>90,108</b>	<b>91.3</b>	<b>29.2</b>	<b>51.5</b>	<b>2.8</b>	<b>54.2</b>	<b>5.9</b>	<b>16.7</b>	
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data.            Due to rounding, totals may not equal 100.0%</i>												
<i>FFL excluded from Aggregate Data.</i>												