



Western Reserve Land Conservancy

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2020 Home Mortgage Lending in Cuyahoga County

Including a 5 Year Review of 3 lenders with Community Benefits Agreements

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Acknowledgement

The author wishes to thank Northeast Ohio Community and Neighborhood Data for Organizing (NEOCANDO) at the Center on Urban Poverty and Community Development, Case Western Reserve University's Mandel School of Applied Social Sciences. NEOCANDO is a treasured resource for researchers, public officials and community development practitioners in Cuyahoga County. This study would not have been possible without data assembled and made available through NEOCANDO.

EXECUTIVE SUMMARY

In 2020, the most recent year for which home mortgage lending data is now available, three hundred and eighty nine (389) financial institutions received and processed applications for home purchase and home repair mortgage loans in Cuyahoga County. This report provides tables and charts that look at this lending activity from several perspectives:

- **General Trends.** Lending trends across all lenders with respect to race and loan purpose.
- **Top 15 Lenders.** Ranking the top 15 lenders that made the greatest number of loans in specific categories, including their lending to traditionally underserved borrowers and communities.
- **CBA Lenders.** A 5-year review of 3 lenders that entered into Community Benefits Agreements (CBAs) with the National Community Reinvestment Coalition (NCRC): Fifth Third Bank, Huntington Bank and KeyBank. This review offers a further advantage in that KeyBank is also engaged in a multi-year agreement to provide banking services to Cuyahoga County government.

The analysis and findings in the pages that follow update prior research that reviewed mortgage lending in Cuyahoga County during the following years: 2016¹, and 2017², 2018³, and 2019⁴.

While much of Cuyahoga County is experiencing a hot real estate market resulting from limited supply due to COVID-19, there are still significant portions of the county, particularly areas with majority Black population, where housing prices are struggling to recover from the foreclosure crisis⁵. For these areas to achieve recovery, it is essential that they have fair access to responsible mortgage credit for home purchase and home repair. The purpose of this report is to provide housing and community advocates, and civic leaders, with information about home mortgage lending activity and access.

Key Findings:

Changes in Application Volume From 2019

- In 2020 there was a **22% decrease in applications for home improvement** loans, possibly due to a reluctance of homeowners to have contractors in their homes during COVID-19.
- There was a substantial **83% increase in refinance applications**, possibly due to homeowners needing additional financial resources during COVID-19.

¹ "Housing Trends In Cuyahoga County: Race And Geography Still Matter".

<https://www.dropbox.com/s/Oglee0uiebm8c1b/Cuyahoga%20Housing%20Trends%202018.pdf?dl=0>

² "Housing Market Recovery In Cuyahoga County: Will Cleveland's East Side Be Left Behind?".

https://www.wrlandconservancy.org/wp-content/uploads/2019/07/Cuyahoga-Housing-Trends-2019_7-30-19.pdf

³ "Home Mortgage Lending in Cuyahoga County (2018). [https://www.wrlandconservancy.org/wp-](https://www.wrlandconservancy.org/wp-content/uploads/2019/12/Cuyahoga-Home-Mortgage-Lending_12-22-19.pdf)

[content/uploads/2019/12/Cuyahoga-Home-Mortgage-Lending_12-22-19.pdf](https://www.wrlandconservancy.org/wp-content/uploads/2019/12/Cuyahoga-Home-Mortgage-Lending_12-22-19.pdf)

⁴ Home Mortgage Lending in Cuyahoga County (2019).

https://www.dropbox.com/s/dccwmzk8wy58c63/Cuyahoga%20Home%20Mortgage%20Lending_11-13-20.pptx?dl=0

⁵ "Housing Market Recovery in Cuyahoga County 2000-2020".

<https://www.dropbox.com/s/mdkgz5xhvrohpxj/Cuyahoga%20Housing%20Market%20Recovery%202000-2020%202-23-21.pdf?dl=0>

- There was an increase in home purchase loan applications to ***non-bank mortgage companies***.

Lending to Underserved Borrowers and Communities in 2020

- There continues to be a significant ***disparity in access to mortgage lending in Cuyahoga County for Black borrowers and majority Black communities when compared to their White counterparts***. Lack of access to home purchase and home repair loans undermines housing market recovery in a substantial portion of Cuyahoga County. Slow market recovery in these communities undermines the county's property tax base and much needed revenue for municipal school, police, fire and social services.
- Black borrowers continue to be rejected more often than White borrowers. In fact, high income Black borrowers continue to be denied loans more often than high income White borrowers. And, more troubling, ***high income Black borrowers continue to be denied loans more frequently than middle and moderate income White borrowers***.
- Across all five regions of the county, ***access to home improvement loans decreases as percent of Black population increases***.

Lenders with CBA Agreements

With a full five years of lending studied, this report was able to take a long view of the performance of three banks with multi-year Community Benefits Agreements (CBAs): Fifth Third, Huntington and KeyBank. The purpose of these agreements was to induce each of these lenders to improve their lending performance in underserved communities: low and moderate income, and people of color. The agreements were multi-state. Each bank has declared success in meeting their performance targets. However, for residents of underserved regions of Cuyahoga County, the true measure of success is whether lending activity increased in their communities.

Huntington Bank performed in Cuyahoga County exactly as might have been hoped: increased lending throughout the five year period, or maintenance of already leading numbers. This was in stark contrast to both KeyBank and Fifth Third, whose lending performance was either inconsistent, remained flat or in some cases actually decreased during the five year period studied. A bulleted outline appears below, and a more detailed breakdown is contained in charts and graphs within this report.

Fifth Third

- Fifth Third – home purchase loans decreased during the 5 year period.
- Fifth Third – home repair loans increased county-wide, but no increase in regions of the county that were the intended targets of a community benefits agreement.
- Fifth Third – small dollar loans for home purchase – decreased or remained flat.
- Fifth Third – loans to low and moderate income borrowers – ended the 5 years with significantly fewer loans than began in 2016.

KeyBank

- KeyBank – home purchase loans increased for the first 4 years, then dropped in year 5.
- KeyBank – home repair loans decreased by half or more during the 5 year period in every region studied.
- KeyBank – small dollar loans for home purchase – extremely low volume over the 5 years: only 5 loans in the entire county in 2020, only 3 in East Side of Cleveland, and 0 loans in the East inner suburbs in 2020.

- KeyBank – loans to low and moderate income borrowers – while they did double their production from 35 loans in 2016 to 86 loans in 2020, that volume is significantly less than Fifth Third (164 in 2020) and Huntington (296 in 2020).

Huntington

- Huntington – home purchase loans increased dramatically during the 5 year period in most regions studied.
- Only the East Side stayed level, but Huntington’s volume in that region was 4 times that of the other two CBA lenders.
- Huntington– home repair loans experienced a dramatic 5-fold increase county-wide, with similar improvement in underserved regions.
- Huntington– small dollar loans for home purchase decreased over the 5 years, but were still 2 to 3 times the volume of KeyBank or Fifth Third.
- Huntington– loans to low and moderate income borrowers increased steadily throughout the 5 year period and the volume was significantly greater than KeyBank and Fifth Third.
- Huntington was also a leader in other categories among the 389 lenders studied.
 - Highest applications – suggesting successful marketing of loan products.
 - Appear as #1 or #2 in ten of the top categories studied.
 - Reinvested the greatest percent of deposit dollars among the top 4 banks that had at least \$5 Billion in deposit holdings.

Other Observations

- US Bank was compared to the 3 CBA lenders because discussions are underway with US Bank regarding a possible multi-year Community Benefits Agreement.
 - ***US Bank showed little or no improvement over the past 5 years and their numbers were lower than the leading lenders in each category studied.***
- The volume of loans for home repair and home improvement remains low in the East Side of Cleveland, a region of Cuyahoga County with a significant unmet need.
- The volume of loans for home purchase loans at or below \$50,000 also remains low in the East Side of Cleveland where low sale prices present an opportunity for affordable home ownership.

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SCOPE OF THE RESEARCH

Scope of The Research

Home Mortgage Lending

● 2020 Data: Analysis of action taken by 389 lenders nationwide that received 26,693 applications for loans on property in Cuyahoga County meeting these criteria:

- 1-4 Family homes (multifamily > 4 excluded),
- Home purchase and home repair (refinance excluded),
- Original loan transactions only, i.e. excludes the subsequent purchase of a loan by another lender.

● 2016-2017-2018-2019-2020 Data: The lending record of 3 banks with Community Benefits Agreements (CBAs) over 5 years is noted: Fifth Third Bank, Huntington Bank, KeyBank.

Data Sources

- **2016, 2017, 2018, 2019 and 2020 Home Mortgage Disclosure Act (HMDA) data from Federal Financial Institutions Examination Council (FFIEC) and NEO CANDO at Case Western Reserve University (CWRU).**
- **Low and moderate income data from US Census 5-year estimate (2014-18). Income definitions from Code of Federal Regulations: 12 C.F.R. Section 228.12(m).**

COMMUNITY BENEFITS AGREEMENTS

Lenders That Have Community Benefits Agreements (CBA) With the National Community Reinvestment Coalition (NCRC)

- Fifth Third Bank (\$32 Billion, 2016 through 2020)
- KeyBank (\$16.5 Billion, 2017 through 2021)
-Will be continued and expanded to \$40 Billion
- Huntington Bank, (\$16.1 Billion, 2017 through 2021)
-Has been continued and expanded to \$40 Billion

US Bank Lending Data

Discussions are underway with US Bank about a possible Community Benefits Agreement.

A five year history of US Bank mortgage lending is included in some of the charts within to provide a comparison to the lending of the 3 CBA lenders.

KeyBank

Contract with Cuyahoga County For Banking Services

Unlike the Community Benefits Agreements (CBAs) with NCRC, the contract does not include an overall dollar target for investment.

However, the contract does state that KeyBank will “use its best efforts” to fulfill 13 Community Commitments

CBA Lenders

Fifth Third - Huntington - KeyBank

**A Review of Lending In Cuyahoga County
During Their Multi-year Agreements**

2016 – 2017 – 2018 – 2019 – 2020

All three banks announced this year that they have met or exceeded the goals in their agreements.

Fifth Third

Fifth Third Exceeds Five-Year Community Commitment, Achieves \$41.6 Billion in Support Against \$32 Billion Goal

Press Release 4/2/21

CINCINNATI—Fifth Third Bank, National Association, today reports that it has exceeded the financial goal of the five-year Community Commitment it made in 2016. Fifth Third has delivered \$41.6 billion in lending and investments, 130% of the \$32 billion target* it announced with the National Community Reinvestment Coalition, together with more than 145 community signatories throughout its footprint.

KeyBank

KeyBank of Cleveland expands plan to invest billions in low-income neighborhoods

Updated: Mar. 11, 2021, 8:07 a.m. | Published: Mar. 11, 2021, 8:07 a.m.

By Eric Heisig, cleveland.com

CLEVELAND, Ohio — The Cleveland-based KeyBank on Thursday said it would expand a nationwide initiative to invest tens of billions of dollars into lower-income communities through small business loans, mortgages and other programs.

The financial institution said in a news release that it spent \$18 billion between 2017 and 2020 through a “community benefits plan.”

It now plans to continue the program and bring its total investment to \$40 billion in 15 states.

The bank initially committed \$16.5 billion. The \$18 billion invested over four years included \$996 million in investments in Northeast Ohio, according to the release.

Huntington

Huntington, NCRC Announce \$40 Billion Expanded Community Benefits Plan

By NCRC / June 16, 2021 / Press Releases

Huntington Bancshares Inc. (Nasdaq: HBAN) and the National Community Reinvestment Coalition (NCRC) today announced a **new \$40 billion community benefits plan** that will focus on affordable housing, small business loans and increased capital to low- and moderate-income communities, communities of color and communities that have been historically disadvantaged.

The plan, based on discussions between the bank, NCRC and more than 120 community leaders and NCRC members in 20 cities across seven states, is the second such agreement between NCRC and Huntington Bank. **In 2016, the bank committed to a \$16.1 billion community benefits plan with NCRC, which was completed in 2020.**

LOAN APPLICATION TRENDS

Top 40 lenders receiving loan applications in 2019 & 2020

-home purchase and home improvement on 1-4 family-

-Showing change from 2019-

	Lender	2019	2020	Change			Lender	2019	2020	Change
1	Huntington Bank	2383	2421	↑		21	Lendus DBA RPM Mortgage	250	270	↑
2	Crosscountry Mortgage	1425	2157	↑		22	Navy Federal Credit Union	289	261	↓
3	Third Federal S&L	2199	1934	↓		23	Freedom Mortgage	206	252	↑
4	Howard Hanna Mortgage	1248	1255	↑		24	Premier Bank	0	246	↑
5	KeyBank	1437	1110	↓		25	Wells Fargo Bank	417	241	↓
6	Quicken Loans	959	1034	↑		26	Mortgage Research Center	183	226	↑
7	PNC Bank	1166	982	↓		27	United Wholesale Mortgage	0	223	↑
8	First Federal S&L - Lakewood	936	932			28	Goldwater Bank	223	212	↓
9	CBNA/Citizens	1105	919	↓		29	Bank of America	232	203	↓
10	Fifth Third Bank	1205	887	↓		30	TCF Bank (Chemical in 2019)	115	195	↑
11	Fairway Independent Mortgage	514	664	↑		31	Caliber Home Loans	56	192	↑
12	US Bank	567	566			32	Amerifirst Home Mortgage	171	188	↑
13	Dollar Bank	666	565	↓		33	Discover Bank	149	180	↑
14	Liberty Home Mortgage	341	502	↑		34	PrimeLending	130	180	↑
15	Chase Bank	703	436	↓		35	Reliance First Capital LLC	130	180	↑
16	First National Bank of PA	426	373	↓		36	Gold Star Mortgage	157	179	↑
17	Union Capital Mortgage	327	342			37	LoanDepot	113	153	↑
18	Nations Lending	218	292	↑		38	LendingOne LLC	108	142	↑
19	American Midwest Mortgage	287	288			39	Ruoff Home Mortgage	82	142	↑
20	Union Home Mortgage	307	282	↓		40	Your Home Financial	0	133	↑

Observation: Decrease in loan applications for some of the larger banks likely due to decrease in home repair applications. Increase in loan applications from smaller banks and mortgage companies likely due to increased home purchase lending in our local market.

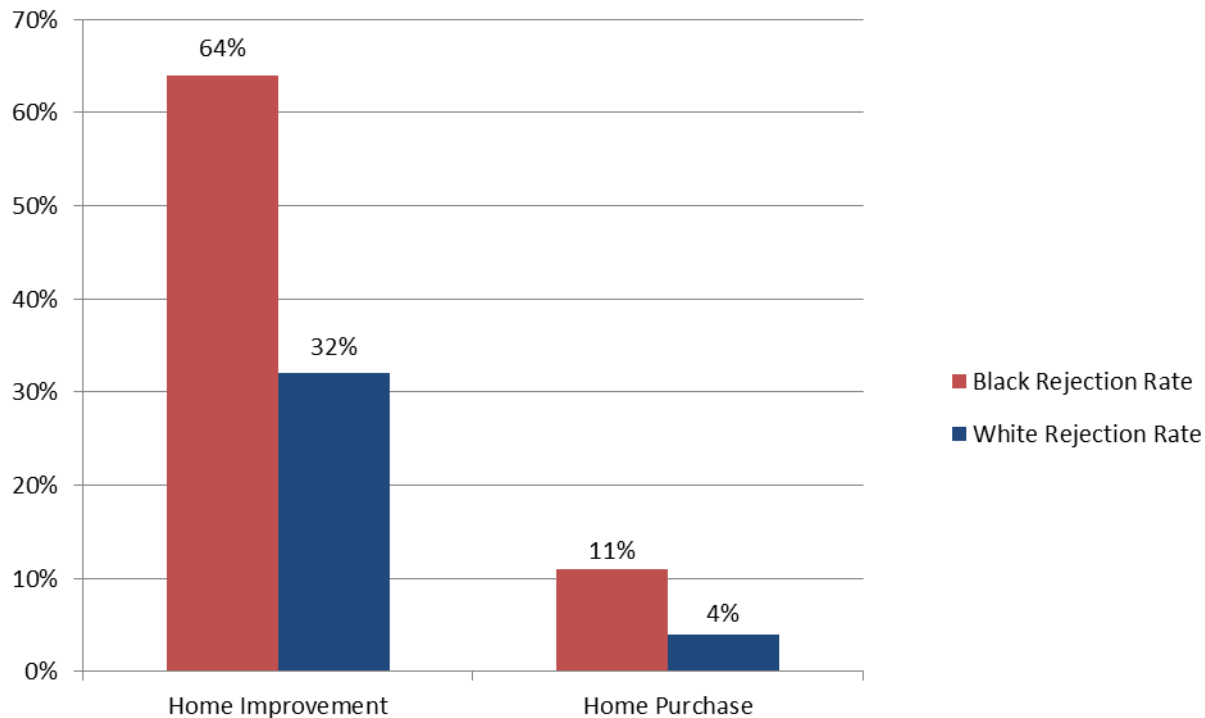
Loan Applications in Cuyahoga County by Loan Purpose in 2019 and 2020

	Loan Applications			Loans		
Loan Purpose	2019	2020	<i>Change</i>	2019	2020	<i>Change</i>
Home purchase	20368	22107	9%	15186	16355	8%
Improvement	6167	4837	-22%	2851	2150	-25%
Refinance	18850	34585	83%	10551	20735	97%
Other	5868	4670		2837	2211	
NA	31	28		16		
Totals	51284	66227	29%	31441	41451	32%

Total loan applications increased dramatically in 2020 compared to 2019 in Cuyahoga County. The increase was due primarily to an 83% increase in refinancing – possibly a result of cash-strapped homeowners needing additional resources during the COVID-19 pandemic – and to a lesser extent a 9% increase in applications for home purchase loans. At the same time, applications for home improvement and repair decreased by 22% in 2020 compared to 2019. This may be due to a reluctance of homeowners to have contractors in their homes during COVID-19.

RACE AND LENDING

Home Mortgage Loan Rejection Rates 2020 Cuyahoga County - 1 to 4 Family Homes



Source: Federal Financial Institutions Examination Council (FFIEC) and NEO CANDO at Case Western Reserve University.
Excludes loans that a lender purchased from another bank.

In 2020 Blacks who applied for loans were rejected significantly more often than White borrowers: twice as often with home improvement loans and nearly 3 times as often with home purchase loans. Similar trends were observed in previous published analysis of 2017 lending data https://www.wrlandconservancy.org/wp-content/uploads/2019/07/Cuyahoga-Housing-Trends-2019_7-30-19.pdf, 2018 lending data https://www.wrlandconservancy.org/wp-content/uploads/2019/12/Cuyahoga-Home-Mortgage-Lending_12-22-19.pdf, and 2019 lending data https://www.dropbox.com/s/6zo97srhoza317l/Cuyahoga%20Home%20Mortgage%20Lending_11-13-20%20udpated%209-19-21.pdf?dl=0.

Does Borrower Income Have An Impact On Rejection Rates?

Cuyahoga Median Family Income = \$66,174 per US Census 5-Year Estimate (2014-2018).

High Income = more than or equal to \$79,408 ($\geq 120\%$ median).

Middle Income = \$52,939 to \$79,407 ($\geq 80\%$ but $< 120\%$ median).

Moderate Income = \$33,088 to \$52,938 ($\geq 50\%$ but $< 80\%$ median).

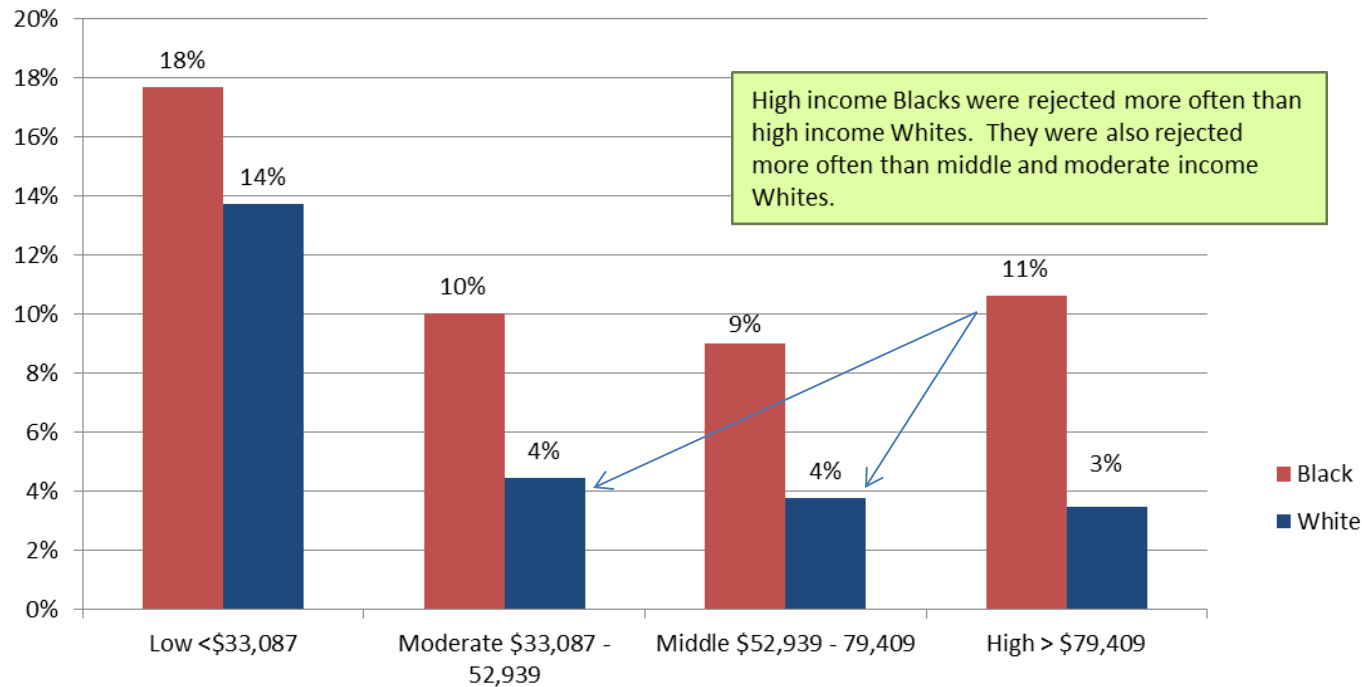
Low Income = less than \$33,088 ($< 50\%$ median).

Income definitions: 12C.F.R. Section 228.12(m).

Data source: US Census and Cleveland.com

<https://www.cleveland.com/datacentral/2020/01/every-ohio-city-and-county-ranked-for-median-family-household-income-census-estimates.html>

Home Purchase Loan Rejection Rates For White and Black Applicants - By Income Cuyahoga County 2020



Source: Federal Financial Institutions Examination Council (FFIEC), 2017 US Census and NEO CANDO at Case Western Reserve University.

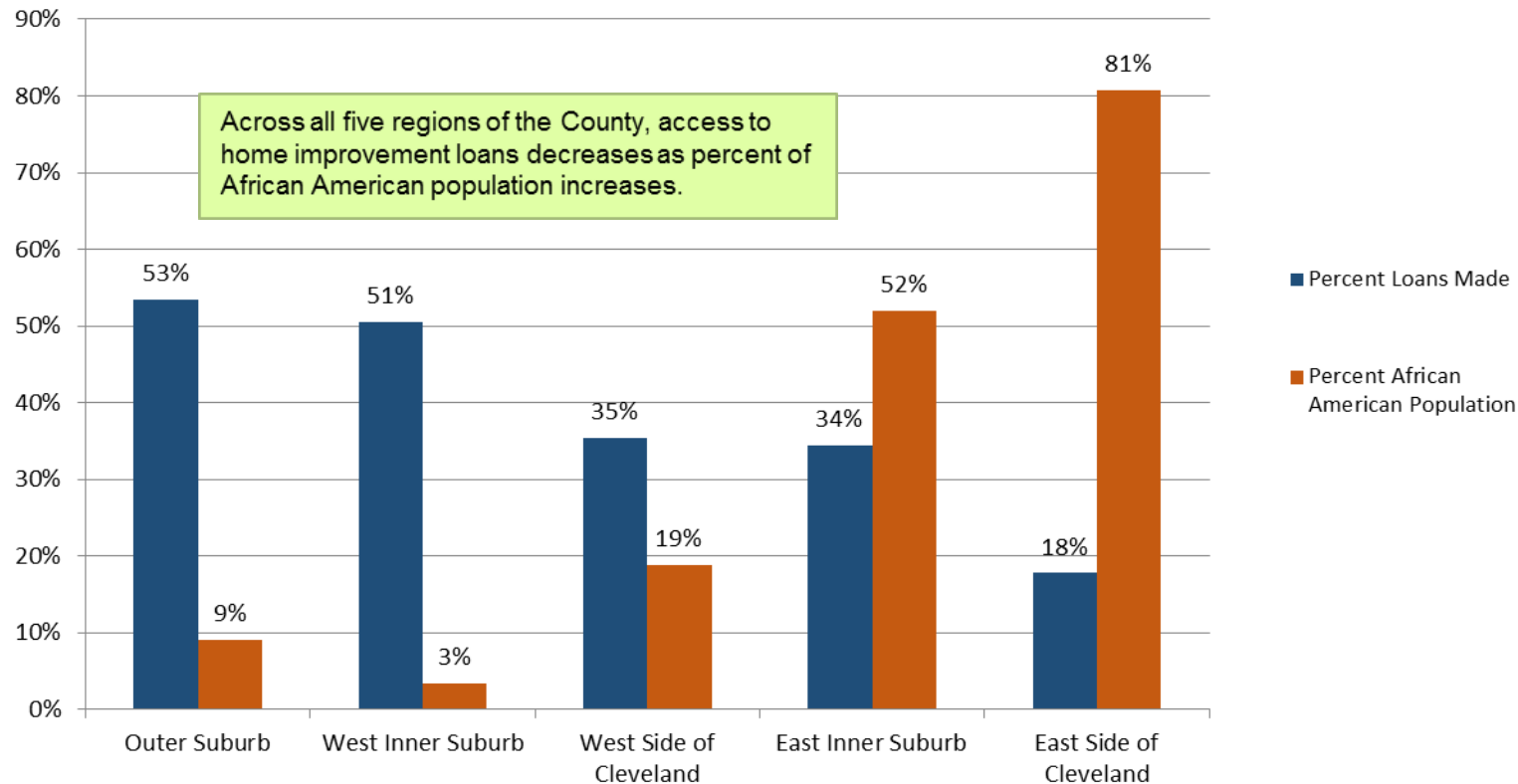
Cuyahoga median family income = \$66,174 per US Census 2018 - 5 year estimate (2014-2018).

Low <50% median. Moderate ≥50% but <80% median. Middle ≥80% but <120% median. High ≥120% median.

Applications for home purchase loans on 1-4 family dwellings.

At low income levels, both White and Black borrowers are denied loans at comparatively high rates. However, Black borrowers in Cuyahoga County are denied loans significantly more often than White borrowers at moderate, middle and high income levels. Not only are high income Black borrowers denied loans more frequently than high income White borrowers, they are also denied loans more often than middle and moderate income White borrowers. This finding has been consistent for the past several years.

1-4 Family Home Improvement Loans Percent of Loans Made From Applications Received and Percent of African American Population Cuyahoga County Regions (2020)



Source: 2019 Home Mortgage Disclosure Act (HMDA) data, 2012 US Census data, NEO CANDO at Case Western Reserve University.

Excludes home purchase, refinancing and loans that were purchased by a bank from another bank.

Prepared by Frank Ford, Western Reserve Land Conservancy, 11-6-21.

Home improvement loans are not distributed equally across Cuyahoga County. The East Side of Cleveland, where a Land Conservancy survey documented that home repair needs are greatest, had the least access to home improvement loans. The East Inner Suburbs are on a par with the West Side of Cleveland, but still trail the West Inner and Outer Suburbs. Most striking is the disparity by race. The region with the least access is the East Side of Cleveland, where more than 80% of the population is African American.

HOME PURCHASE LENDING

A Review of the Top 15 **Home Purchase** Lenders In The Following Regions

- **County-Wide**
- **Cleveland** *31 of 34 neighborhoods are low or moderate income.*
- **East Side of Cleveland** *80% Black population and 19 of 20 neighborhoods are low or moderate income.*
- **East Inner Suburbs** *52% Black population and 4 of 11 suburbs are low or moderate income.*

**Top 15 Lenders That Made Home Purchase Loans on 1-4 Family Homes
In Cuyahoga County in 2020
Sorted by Loans Made**

Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Crosscountry Mortgage	2157	1732	80%	356,875,000	290,160,000	81%
Third Federal S&L	1395	1140	82%	264,355,000	217,210,000	82%
Howard Hanna Mortgage	1255	1050	84%	267,885,000	226,040,000	84%
Huntington Bank	1345	1021	76%	248,515,000	196,565,000	79%
Quicken Loans	1021	769	75%	175,165,000	134,215,000	77%
First Federal S&L Lakewood	929	729	78%	200,195,000	159,575,000	80%
Fairway Ind Mortgage	663	489	74%	93,055,000	69,645,000	75%
Fifth Third Bank	620	478	77%	112,600,000	85,150,000	76%
KeyBank	516	370	72%	124,450,000	93,620,000	75%
Liberty Home Mortgage	483	335	69%	77,855,000	54,745,000	70%
PNC Bank	475	327	69%	86,485,000	62,445,000	72%
CBNA/Citizens	447	326	73%	74,035,000	53,680,000	73%
Chase Bank	376	281	75%	81,920,000	59,745,000	73%
Nations Lending	292	260	89%	50,980,000	46,100,000	90%
American Midwest Mortgage	287	251	87%	44,775,000	38,445,000	86%
Top 15 Total	12261	9558	78%	2,259,145,000	1,787,340,000	79%

County-wide, the top home purchase lenders were CrossCountry, Third Federal and Howard Hanna. CrossCountry has steadily increased its lending volume over the past 5 years. Huntington is a close fourth. Huntington was also the top county-wide lender among the three banks with Community Benefits Agreements (CBAs). 23

**Top 15 Lenders That Made Home Purchase Loans on 1-4 Family Homes
In City of Cleveland in 2020
Sorted by Loans Made**

Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Crosscountry Mortgage	400	301	75%	49,640,000	37,325,000	75%
Huntington Bank	286	207	72%	39,730,000	30,275,000	76%
First Federal S&L - Lakewood	182	139	76%	26,850,000	22,065,000	82%
Third Federal S&L	175	138	79%	28,725,000	23,740,000	83%
Quicken Loans	157	109	69%	20,745,000	14,915,000	72%
Howard Hanna Mortgage	133	99	74%	24,445,000	18,215,000	75%
Fairway Independent Mortgage	125	79	63%	13,595,000	8,445,000	62%
Lendus DBA RPM Mortgage	87	71	82%	8,905,000	7,325,000	82%
Fifth Third Bank	106	68	64%	10,800,000	7,600,000	70%
CBNA/Citizens	93	65	70%	12,375,000	9,645,000	78%
KeyBank	98	62	63%	14,120,000	9,730,000	69%
Premier Bank	69	60	87%	10,075,000	9,110,000	90%
TCF National Bank	88	56	64%	6,530,000	4,230,000	65%
PNC Bank	85	54	64%	10,865,000	7,810,000	72%
Dollar Bank	71	52	73%	6,765,000	4,870,000	72%
Top 15 Total	2155	1560	72%	284,165,000	215,300,000	76%

In the City of Cleveland, where 31 of 34 neighborhoods are low or moderate income, CrossCountry is now the leading home purchase lender followed by Huntington, First Federal of Lakewood, Third Federal, Quicken Loans and Howard Hanna. CBA lenders Fifth Third and KeyBank ranked 9th and 11th respectively and both made fewer loans in Cleveland than they did in 2019. Huntington increased its lending in Cleveland from 195 to 207 loans. US Bank dropped from the top 15 in Cleveland, having decreased its home purchase²⁴ lending from 52 loans in 2019 to 39 in 2020.

**Top 15 Lenders That Made Home Purchase Loans on 1-4 Family Homes
In the East Side of Cleveland in 2020
Sorted by Loans Made**

	Loans Applied For			Dollars Applied For		
Lender (CBA Lender in red)	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Crosscountry Mortgage	125	90	72%	13,765,000	10,010,000	73%
Huntington Bank	77	49	64%	7,945,000	5,365,000	68%
Fairway Independent Mortgage	54	34	63%	5,320,000	3,530,000	66%
Third Federal S&L	38	31	82%	6,030,000	5,385,000	89%
First Federal S&L - Lakewood	40	26	65%	3,040,000	2,000,000	66%
Quicken Loans	40	25	63%	4,130,000	2,935,000	71%
Northpointe Bank	30	20	67%	1,470,000	960,000	65%
Dollar Bank	21	17	81%	1,045,000	735,000	70%
PrimeLending	24	17	71%	1,750,000	1,345,000	77%
TCF National Bank	31	17	55%	1,955,000	1,085,000	55%
Stifel Bank & Trust	19	16	84%	1,135,000	950,000	84%
PNC Bank	25	14	56%	2,005,000	1,270,000	63%
Freedom Mortgage	17	12	71%	1,405,000	800,000	57%
CBNA/Citizens	24	11	46%	1,640,000	895,000	55%
Fifth Third Bank	25	11	44%	1,865,000	645,000	35%
Top 15 Total	590	390	66%	54,500,000	37,910,000	70%

In the East Side of City of Cleveland, where 19 of 20 neighborhoods are low or moderate income, and the population is 80% African American, CrossCountry has been increasing its lending and is now the leading home purchase lender, followed by Huntington, Fairway Independent Mortgage, and Third Federal S&L. KeyBank dropped from the top 15, having made only 11 loans in 2020 compared²⁵ to 17 in 2019. Fifth Third dropped to 15th from being 12th one year ago.

**Top 15 Lenders That Made Home Purchase Loans on 1-4 Family Homes
In the East Inner Suburbs in 2020
Sorted by Loans Made**

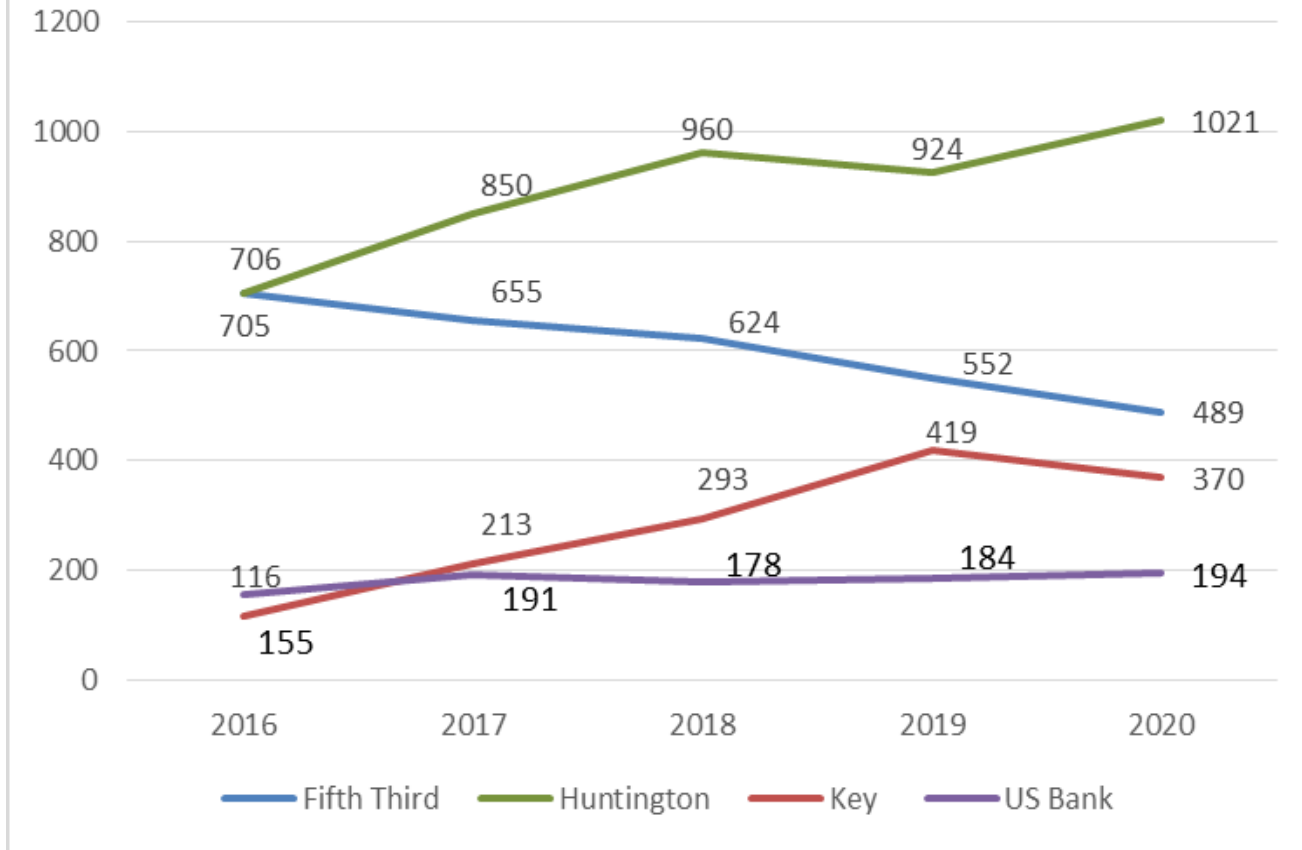
Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Crosscountry Mortgage	464	359	77%	60,200,000	47,605,000	79%
Howard Hanna Mortgage	280	240	86%	60,440,000	52,630,000	87%
Huntington Bank	282	203	72%	42,440,000	32,125,000	76%
Quicken Loans	216	145	67%	26,750,000	17,945,000	67%
Fairway Independent Mortgage	193	143	74%	21,015,000	16,245,000	77%
First Federal S&L - Lakewood	136	98	72%	24,840,000	18,800,000	76%
Third Federal S&L	126	96	76%	18,850,000	14,500,000	77%
Liberty Home Mortgage	119	79	66%	16,065,000	10,435,000	65%
American Midwest Mortgage	77	63	82%	10,655,000	7,765,000	73%
Fifth Third Bank	84	61	73%	12,980,000	10,075,000	78%
PNC Bank	76	52	68%	10,650,000	7,610,000	71%
Bank of America	56	47	84%	8,250,000	6,475,000	78%
Dollar Bank	73	46	63%	7,565,000	4,940,000	65%
Freedom Mortgage	70	46	66%	7,910,000	5,550,000	70%
Navy Federal Credit Union	83	44	53%	10,055,000	6,030,000	60%
Top 15 Total	2335	1722	74%	338,665,000	258,730,000	76%

In the East Inner Suburbs, where 4 of 11 suburbs are low or moderate income, and 52% of the population is African American, CrossCountry is the leading lender for the second year in a row, followed by Howard Hanna and Huntington. All 3 increased their loans from 2019. Fifth Third ranked 8th in 2019 and is now ranked 10th in 2020. KeyBank dropped from the top 15, having made only 37 loans in 2020 compared to 62 in 2019.

CBA Lenders - Home Purchase Lending

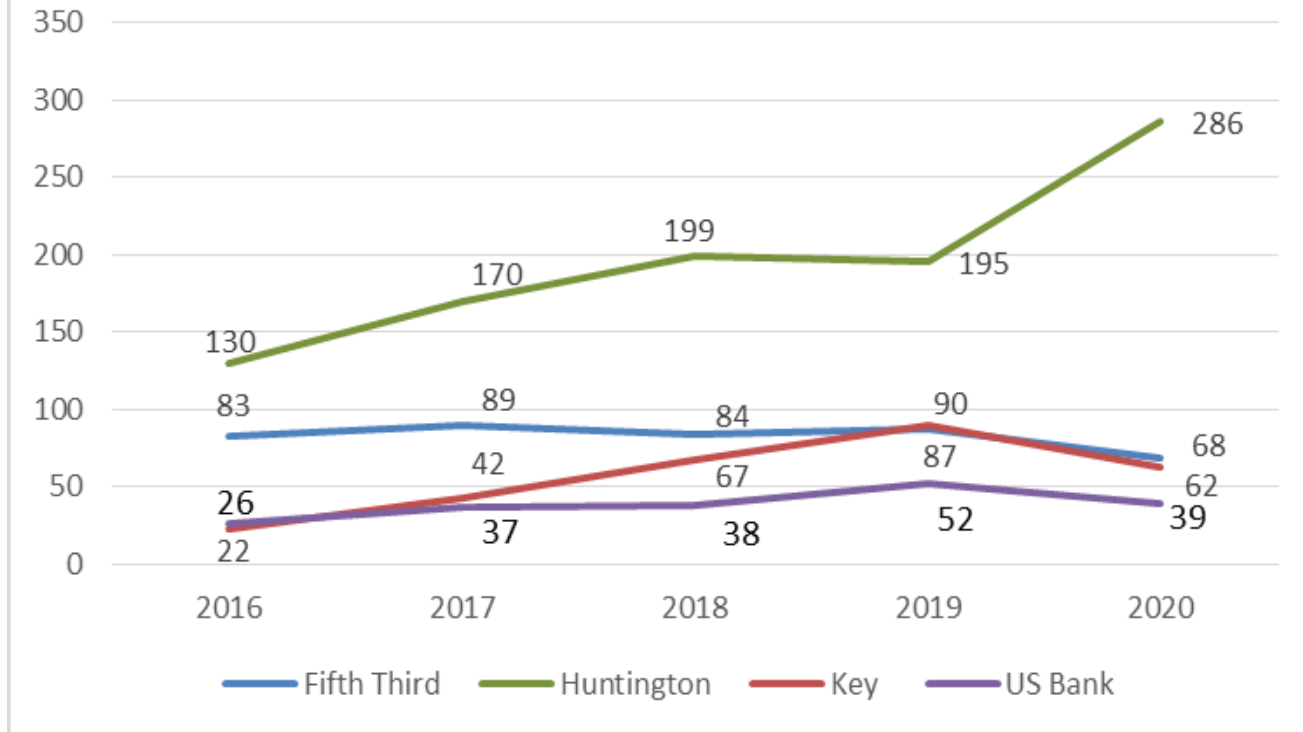
2016 – 2017 – 2018 – 2019 – 2020

Home Purchase Loans - Cuyahoga County CBA Lenders and US Bank 2016-2017-2018-2019-2020



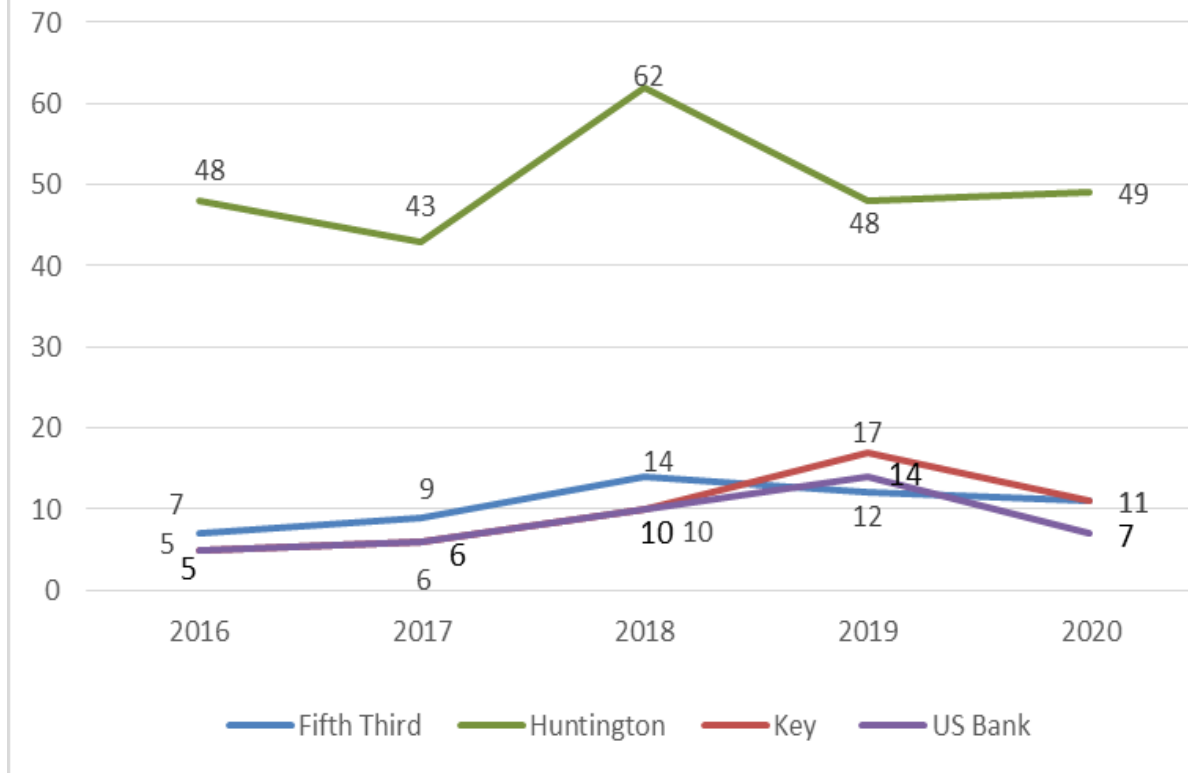
KeyBank had been steadily increasing its home purchase lending in Cuyahoga County over the period of its CBA agreement but lending declined in 2020. Among the three banks with CBA agreements, Huntington is the leader making more than double the loans made by the other two CBA lenders in Cuyahoga County. County-wide, Fifth Third’s home purchase lending has declined throughout the entire term of their CBA agreement, which ended in December of this year (2020). In 2016 Huntington and Fifth Third’s home purchase lending production was virtually tied; two years later Huntington’s loan production has increased significantly while Fifth Third’s has declined. This disparity continues in the sub-region slides that follow.

Home Purchase Loans - Cleveland CBA Lenders and US Bank 2016-2017-2018-2019-2020



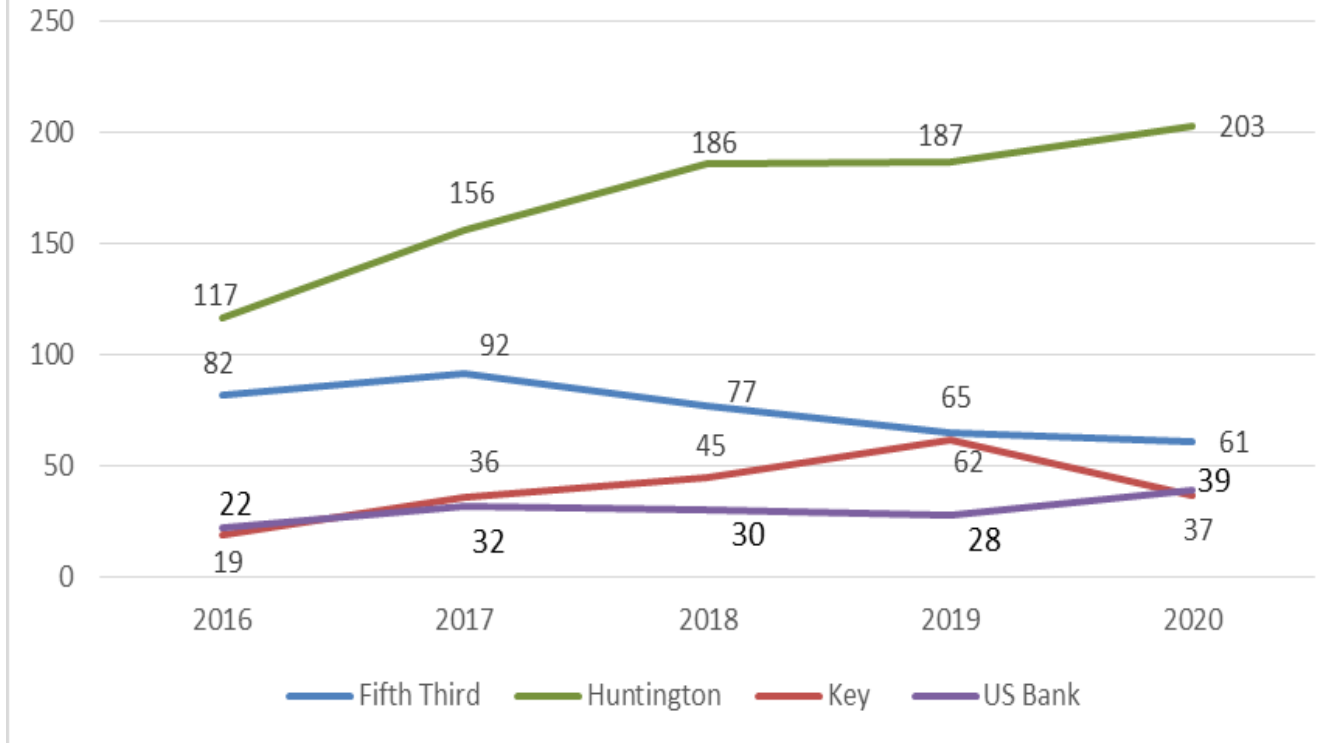
In the City of Cleveland, where more than 90% of the neighborhoods are low or moderate income, KeyBank began its CBA commitment with very low home purchase numbers. It steadily increased its lending through 2019, but then declined in 2020. Huntington continues to be the leader among the three CBA lenders with a loan output that is four times that of KeyBank and Fifth Third. Fifth Third has made no improvement in Cleveland home purchase lending during the entire term of its Community Benefits Agreement.

Home Purchase Loans - East Side of Cleveland CBA Lenders and US Bank 2016-2017-2018-2019-2020



In the East side of Cleveland, where more than 95% of the neighborhoods are low or moderate income, and 80% of the population is African American, each of the three CBA lenders ended the 5 year period with approximately the same loan production they began with in 2016. However, Huntington is the top lender among the 3 CBA lenders in the East Side of Cleveland with approximately four times the output of KeyBank and Fifth Third. Among all lenders in 2020, Huntington is second only to Crosscountry Mortgage in making home purchase loans in the East Side of Cleveland.

Home Purchase Loans - East Inner Suburbs CBA Lenders and US Bank 2016-2017-2018-2019-2020



In the East Inner Suburbs, where more than 36% of the municipalities are low or moderate income, and 52% of the population is African American, Huntington continuously increased its home purchase loan production during the 5 year period. KeyBank’s home purchase lending began low but showed improvement through 2019, then declined significantly in 2020. Except for a brief rise in 2017, Fifth Third’s home purchase lending in the East Inner Suburbs has declined throughout the term of its CBA agreement. At the close of the 5 year period the loan production for Fifth Third and KeyBank was less than 1/3 of Huntington’s production.

HOME REPAIR LENDING

A Review of the Top 15 Home Improvement Lenders In The Following Regions

- **County-Wide**
- **Cleveland** *31 of 34 neighborhoods are low or moderate income.*
- **East Side of Cleveland** *80% Black population and 19 of 20 neighborhoods are low or moderate income.*
- **East Inner Suburbs** *52% Black population and 4 of 11 suburbs are low or moderate income.*

**Top 15 Lenders That Made Home Improvement Loans on 1-4 Family Homes
In Cuyahoga County in 2020
Sorted by Loans Made**

Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Huntington Bank	1076	477	44%	83,240,000	38,765,000	47%
Third Federal S&L	539	292	54%	32,355,000	18,080,000	56%
KeyBank	594	273	46%	31,860,000	14,555,000	46%
CBNA/Citizens	472	246	52%	40,920,000	21,970,000	54%
PNC Bank	507	231	46%	39,195,000	20,355,000	52%
Fifth Third Bank	267	129	48%	19,585,000	10,135,000	52%
Dollar Bank	269	115	43%	16,035,000	8,135,000	51%
Union Capital Mortgage	88	78	89%	23,360,000	20,570,000	88%
US Bank	223	51	23%	11,795,000	3,735,000	32%
First National Bank of PA	76	50	66%	8,290,000	5,660,000	68%
Chase Bank	60	18	30%	5,340,000	2,030,000	38%
Liberty Home Mortgage	19	16	84%	3,375,000	2,860,000	85%
Discover Bank	174	13	7%	9,970,000	795,000	8%
Pentagon Federal Credit Union	23	11	48%	1,855,000	1,065,000	57%
Premier Bank	11	10	91%	1,915,000	1,890,000	99%
Top 15 Total	4,398	2,010	46%	329,090,000	170,600,000	52%

County-wide, Huntington is the top home improvement lender for the second consecutive year, followed by Third Federal and KeyBank. Home Improvement lending for KeyBank, one of three lenders with community benefits agreements (CBAs), has been declining dramatically over the past several years – from 616 loans in 2017 to 273 loans in 2020. CBNA/Citizens, PNC and Fifth Third ranked 4th, 5th and 6th respectively. Although the third CBA lender, Fifth Third, ranked 6th in this list, their home improvement lending also declined significantly, from 238 loans in 2019 to 129 loans in 2020.

**Top 15 Lenders That Made Home Improvement Loans on 1-4 Family Homes
In City of Cleveland in 2020
Sorted by Loans Made**

Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Huntington Bank	252	62	25%	14,130,000	3,830,000	27%
KeyBank	169	61	36%	7,335,000	2,675,000	36%
PNC Bank	92	28	30%	5,120,000	1,770,000	35%
CBNA/Citizens	77	27	35%	4,145,000	1,495,000	36%
Third Federal S&L	66	24	36%	2,520,000	800,000	32%
Dollar Bank	51	13	25%	2,235,000	605,000	27%
Fifth Third Bank	41	11	27%	1,555,000	345,000	22%
US Bank	68	10	15%	2,160,000	450,000	21%
Union Capital Mortgage	8	7	88%	1,510,000	1,405,000	93%
First National Bank of PA	12	5	42%	730,000	375,000	51%
Liberty Home Mortgage	7	5	71%	1,225,000	1,055,000	86%
Navy Federal Credit Union	16	3	19%	670,000	85,000	13%
PrimeLending	3	3	100%	155,000	155,000	100%
Figure Lending	5	2	40%	155,000	40,000	26%
Northwest Bank	2	2	100%	180,000	180,000	100%
Top 15 Total	869	263	30%	43,825,000	15,265,000	35%

In the City of Cleveland, where 31 of 34 neighborhoods are low or moderate income, Huntington and KeyBank were the top home improvement lenders followed by PNC, CBNA/Citizens, Third Federal, Dollar, and Fifth Third. Each of these lenders made fewer home improvement loans in Cleveland in 2020 than they did in 2019.

**Top 15 Lenders That Made Home Improvement Loans on 1-4 Family Homes
In East Side of Cleveland in 2020
Sorted by Loans Made**

Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
KeyBank	70	21	30%	2,820,000	895,000	32%
Huntington Bank	146	19	13%	6,970,000	995,000	14%
PNC Bank	34	10	29%	1,610,000	770,000	48%
CBNA/Citizens	22	7	32%	820,000	265,000	32%
Third Federal S&L	29	7	24%	1,195,000	235,000	20%
Dollar Bank	25	3	12%	945,000	105,000	11%
Navy Federal Credit Union	10	3	30%	340,000	85,000	25%
PrimeLending	3	3	100%	155,000	155,000	100%
US Bank	27	2	7%	865,000	90,000	10%
Bank of America	7	1	14%	395,000	105,000	27%
Fifth Third Bank	11	1	9%	425,000	65,000	15%
First National Bank of PA	4	1	25%	180,000	25,000	14%
TCF National Bank	1	1	100%	25,000	25,000	100%
Farmers National Bank	2	1	50%	60,000	45,000	75%
BMI Federal Credit Union	1		0%	5,000		0%
Top 15 Total	392	80	20%	16,810,000	3,860,000	23%

In the East Side of City of Cleveland, where 19 of 20 neighborhoods are low or moderate income, and 80% of the population is African American, KeyBank and Huntington were virtually tied as the leading home improvement lenders, followed by PNC, CBNA/Citizens, and Third Federal. Access to home repair loans has been a challenge in the East Side of Cleveland, but the numbers are particularly low in 2020 due to fewer applications. Only 392 applications were submitted in 2020, compared to 543 in 2019. 36

**Top 15 Lenders That Made Home Improvement Loans on 1-4 Family Homes
In East Inner Suburbs in 2020
Sorted by Loans Made**

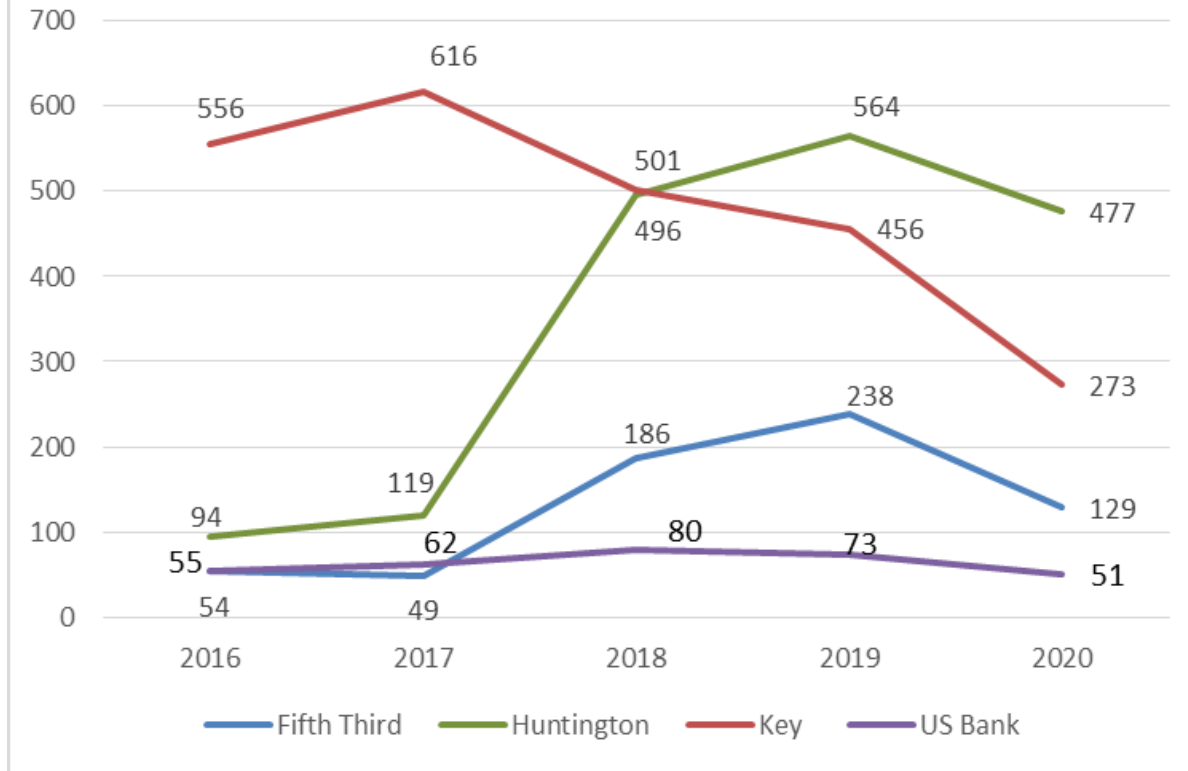
Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Huntington Bank	181	71	39%	11,185,000	5,095,000	46%
KeyBank	128	47	37%	5,850,000	2,165,000	37%
Third Federal S&L	66	33	50%	3,890,000	1,965,000	51%
CBNA/Citizens	60	23	38%	3,340,000	1,415,000	42%
PNC Bank	63	20	32%	3,375,000	1,220,000	36%
Dollar Bank	42	11	26%	4,180,000	2,125,000	51%
Fifth Third Bank	26	11	42%	1,280,000	545,000	43%
Union Capital Mortgage	10	8	80%	2,070,000	1,480,000	71%
Chase Bank	13	7	54%	835,000	415,000	50%
First National Bank of PA	8	5	63%	530,000	285,000	54%
Figure Lending LLC	5	3	60%	115,000	85,000	74%
Pentagon Federal Credit Union	5	3	60%	225,000	165,000	73%
US Bank	41	3	7%	1,715,000	185,000	11%
Navy Federal Credit Union	6	2	33%	220,000	60,000	27%
Bridge Credit Union	1	1	100%	35,000	35,000	100%
Top 15 Total	655	248	38%	38,845,000	17,240,000	44%

In the East Inner Suburbs, where 4 of 11 suburbs are low or moderate income, and the population is 52% African American, the top home improvement lender was Huntington followed by KeyBank, Third Federal, CBNA/Citizens, PNC, Dollar and Fifth Third. As with the East Side of Cleveland, access to home repair loans has been a challenge, but the numbers are particularly low in 2020 due to fewer applications. Only 655 applications were submitted in 2020, compared to 812 in 2019.

CBA Lenders - Home Repair Lending

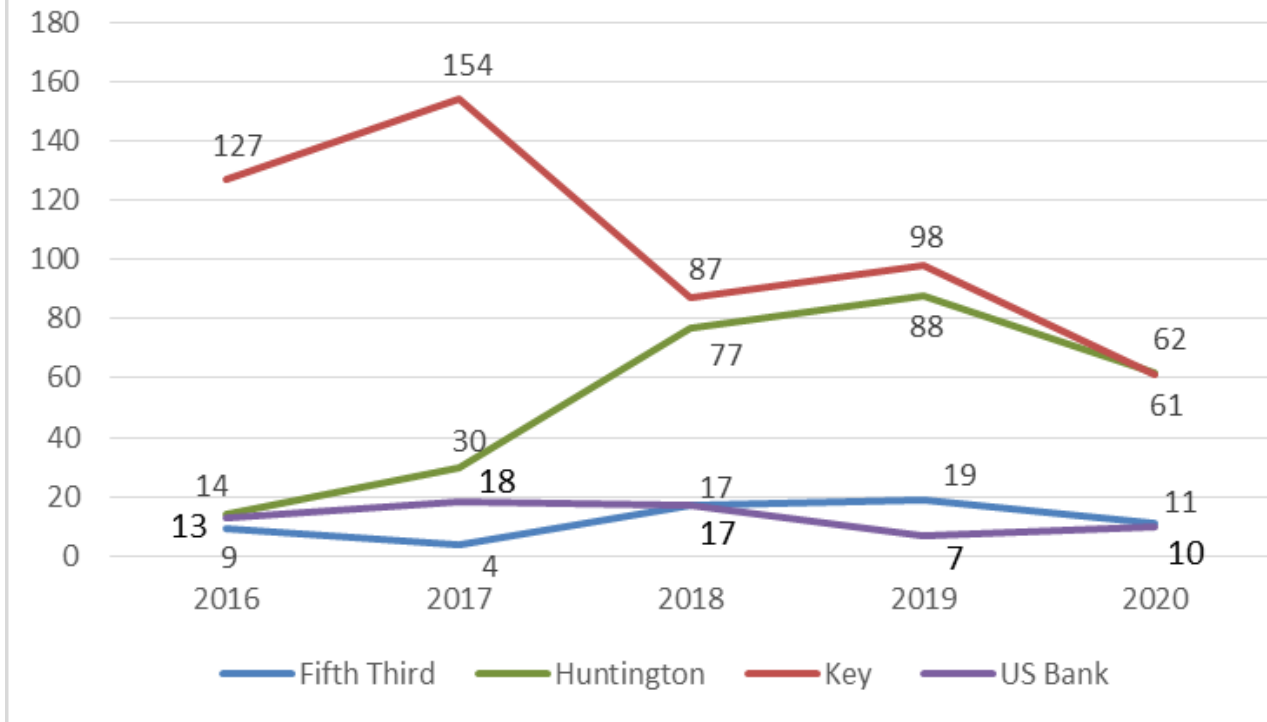
2016 – 2017 – 2018 – 2019 – 2020

Home Repair Loans - Cuyahoga County CBA Lenders and US Bank 2016-2017-2018-2019-2020



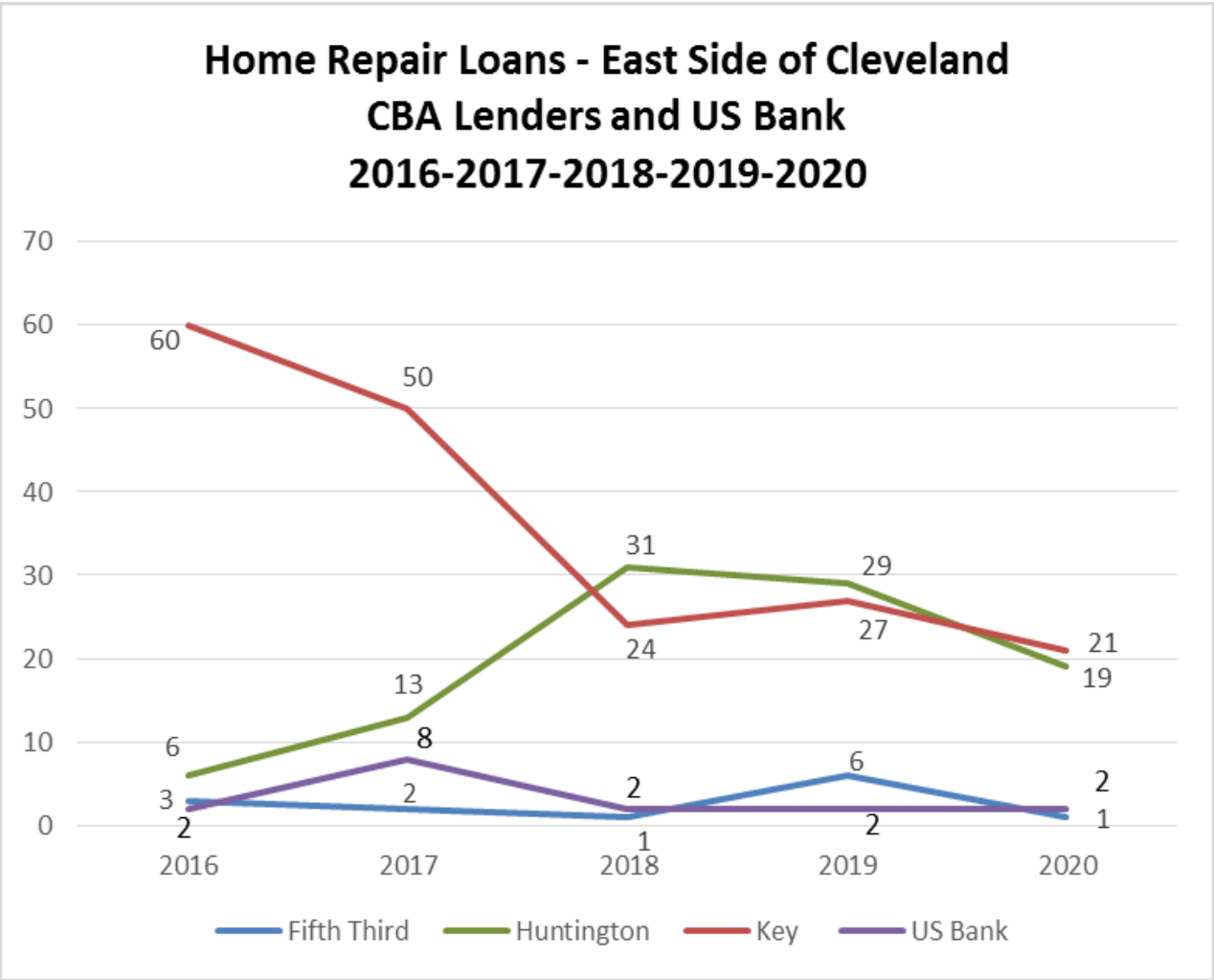
As noted earlier, applications for home repair lending decreased during 2020, likely due to COVID-19. County-wide, Huntington continued to improve its home improvement lending during the 5 year period, and even with the decrease in 2020 ended with a 5-fold increase from 94 to 477 loans. KeyBank, which began the 5 year period as the clear leader in home improvement loan production, decreased its home improvement lending dramatically over the entire period. In stark contrast to its home purchase lending, Fifth Third's home improvement lending more than quadrupled county-wide between 2016 and 2019, from 54 loans to 238 loans. However, as the following slides will show that improvement appeared to be in areas other than those where the need for home repair credit is significant.

Home Repair Loans - Cleveland CBA Lenders and US Bank 2016-2017-2018-2019-2020



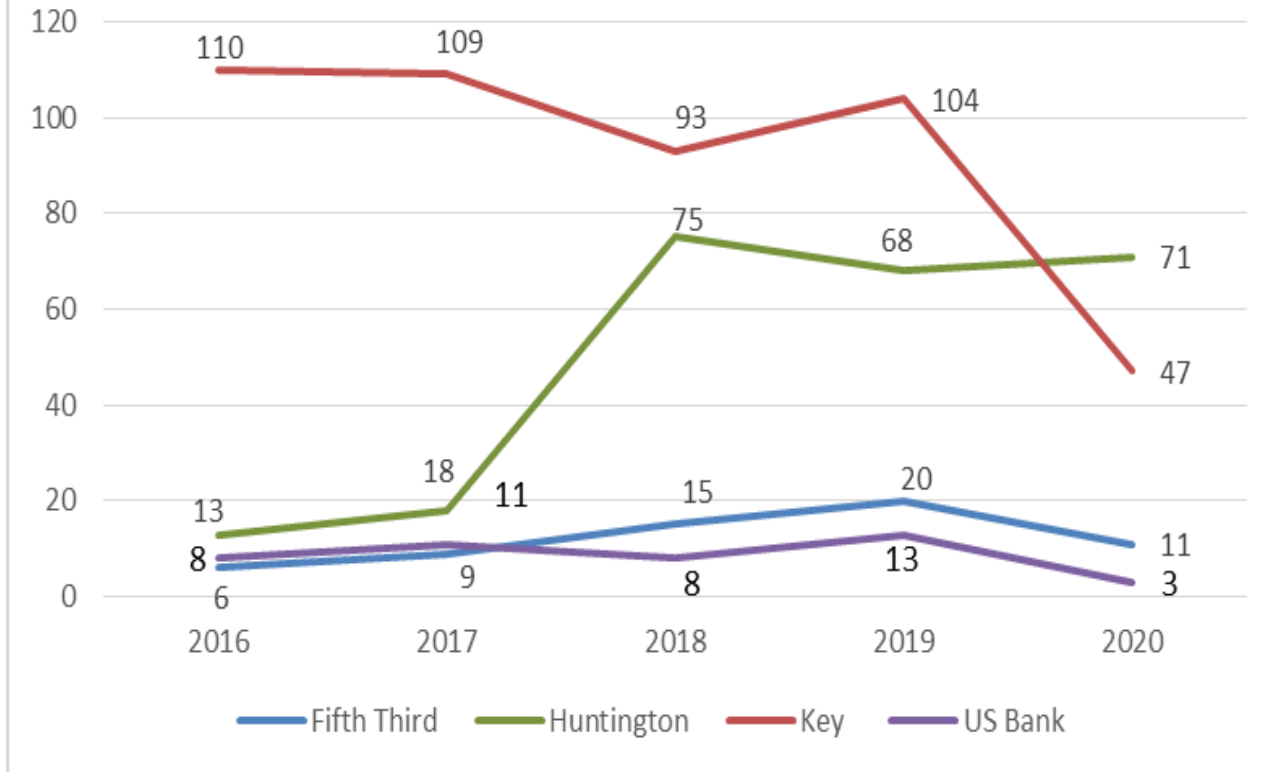
In the City of Cleveland, where more than 90% of the neighborhoods are low or moderate income, Huntington dramatically improved its home improvement lending during the first 4 years of this period, a 6-fold increase from 14 to 88 loans, then declined during COVID-19. Except for a brief rise in 2017, KeyBank’s home improvement loan production in Cleveland has remained below what it was at the beginning of the 5 year period, and declined further during COVID-19. Fifth Third’s home improvement lending in the City of Cleveland has remained consistently low throughout the entire term of its CBA commitment.

Home Repair Loans - East Side of Cleveland CBA Lenders and US Bank 2016-2017-2018-2019-2020



In the East side of Cleveland, where more than 95% of the neighborhoods are low or moderate income, and 80% of the population is African American, there is a significant unmet need for home repair lending, noted earlier in this presentation. In this sub-region KeyBank’s home improvement lending declined dramatically between 2016 and 2019, then further during COVID-19. Huntington’s volume of lending increased from its starting point in 2016, then declined during COVID-19. Fifth Third’s home repair lending has remained consistently low in the East Side of Cleveland throughout the 5 year term of its CBA commitment.

Home Repair Loans - East Inner Suburbs CBA Lenders and US Bank 2016-2017-2018-2019-2020



In the East Inner Suburbs, where more than 36% of the neighborhoods are low or moderate income, and 52% of the population is African American, Huntington made significant gains in home repair loan production throughout the 5 year period, and sustained that production during COVID-19. KeyBank’s lending in the East Inner Suburbs declined slightly over the first 4 years of this period, then dramatically declined during COVID-19. Fifth Third’s home repair lending has remained significantly below the production of Huntington and KeyBank during this period.

SMALL DOLLAR HOME PURCHASE LENDING

A Review of the Top 15 Lenders Making Small Dollar Home Purchase Loans In The Following Regions

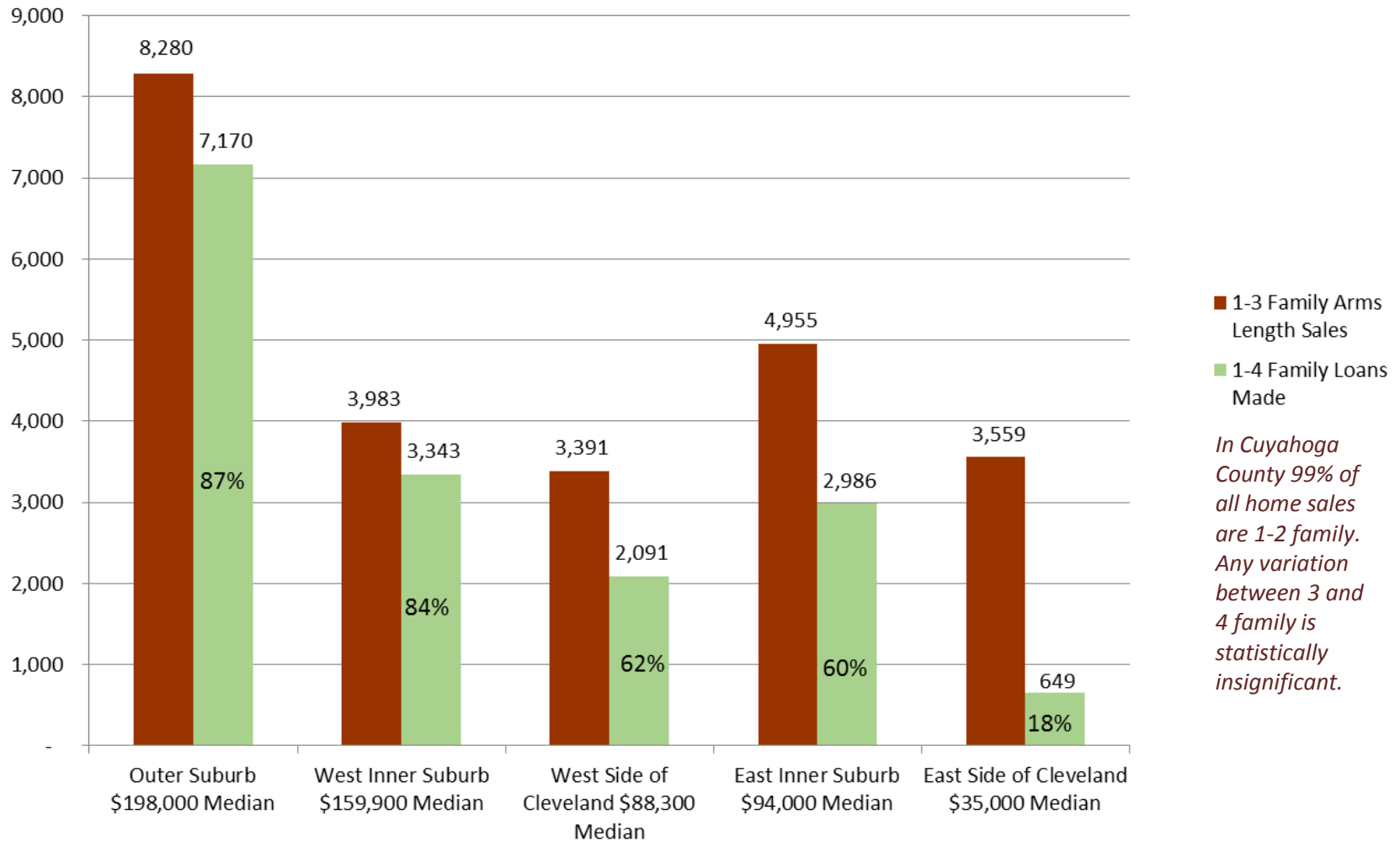
- **County-Wide**
- **Cleveland** *31 of 34 neighborhoods are low or moderate income.*
- **East Side of Cleveland** *80% Black population and 19 of 20 neighborhoods are low or moderate income.*
- **East Inner Suburbs** *52% Black population and 4 of 11 suburbs are low or moderate income.*

Top 15 Lenders - Home Purchase Loans \$50,000 And Lower

Some communities hard hit by the foreclosure crisis have lost more than 50% of their pre-crisis home value. Many decent homes in the East Side of Cleveland and the East Inner Suburbs are selling for \$50,000 or less. These low prices present an opportunity for homeownership, but the low commissions on these loans are unattractive to loan officers, and the disproportionately high fees associated with low dollar loans create issues for banks and their regulators. The tables and charts that follow track low dollar lending in the following sub-regions:

- **County-Wide**
- In **Cleveland** 31 of 34 neighborhoods are low or moderate income.
- In the **East Side of Cleveland** 80% Black population and 19 of 20 neighborhoods are low or moderate income.
- In the **East Inner Suburbs** 52% Black population and 4 of 11 suburbs are low or moderate income.

Comparison of 2020 Home Sales to 2020 Home Purchase Loans in Cuyahoga County Regions



In the East Side of Cleveland there were 3,559 1-3 family home sales in 2020, but only 649 home purchase mortgage loans issued. This suggests two things: 1) a high degree of investor activity, where investors are paying cash or borrowing from non-traditional “hard money” lenders, and 2) a missed opportunity for affordable home ownership and a significant unmet mortgage credit need. To a lesser extent this need is also evident in the East Inner Suburbs and the West Side of Cleveland where only 60-62% of sales were associated with a mortgage loan.

**Top 15 Lenders That Made Home Purchase Loans \$50,000 or Less
on 1-4 Family Homes In Cuyahoga County in 2020
Sorted by Loans Made**

Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Huntington Bank	75	50	67%	2,785,000	1,910,000	69%
Fairway Independent Mortgage	61	43	70%	755,000	445,000	59%
First Federal S&L - Lakewood	52	29	56%	1,950,000	1,135,000	58%
Third Federal S&L	45	25	56%	1,585,000	885,000	56%
Dollar Bank	34	23	68%	950,000	545,000	57%
TCF National Bank	34	18	53%	1,340,000	710,000	53%
Crosscountry Mortgage	26	17	65%	1,040,000	725,000	70%
Fifth Third Bank	32	17	53%	1,150,000	615,000	53%
CBNA/Citizens	29	16	55%	1,005,000	590,000	59%
Wells Fargo Bank	28	16	57%	1,110,000	630,000	57%
US Bank	43	15	35%	1,585,000	525,000	33%
Northpointe Bank	20	14	70%	820,000	560,000	68%
Civista Bank	15	11	73%	635,000	455,000	72%
First National Bank of PA	16	10	63%	690,000	430,000	62%
PNC Bank	21	10	48%	785,000	390,000	50%
Top 15 Total	531	314	59%	18,185,000	10,550,000	58%

County-wide the top home purchase lenders in this category were Huntington and Fairway Independent Mortgage followed by First Federal of Lakewood, Third Federal and Dollar Bank. In this category Huntington was the top lender among the three banks with CBA 47 Agreements. Fifth Third made 17 loans. KeyBank made only 5 loans throughout the county at \$50,000 or less.

**Top 15 Lenders That Made Home Purchase Loans \$50,000 or less
on 1-4 Family Homes In City of Cleveland in 2020
Sorted by Loans Made**

Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Huntington Bank	39	22	56%	1,425,000	840,000	59%
Dollar Bank	24	19	79%	650,000	475,000	73%
First Federal S&L - Lakewood	29	18	62%	1,015,000	680,000	67%
Fairway Independent Mortgage	19	14	74%	195,000	110,000	56%
TCF National Bank	25	14	56%	985,000	560,000	57%
Northpointe Bank	19	13	68%	785,000	525,000	67%
Third Federal S&L	21	12	57%	725,000	430,000	59%
Wells Fargo Bank	21	12	57%	815,000	470,000	58%
Crosscountry Mortgage	16	11	69%	650,000	455,000	70%
Civista Bank	12	9	75%	500,000	365,000	73%
CBNA/Citizens	14	8	57%	480,000	290,000	60%
Fifth Third Bank	16	8	50%	560,000	260,000	46%
Lendus DBA RPM Mortgage	10	8	80%	360,000	310,000	86%
Freedom Mortgage	7	7	100%	155,000	155,000	100%
PrimeLending	10	6	60%	320,000	180,000	56%
Top 15 Total	282	181	64%	9,620,000	6,105,000	63%

In the City of Cleveland, where 31 of 34 neighborhoods are low-moderate income, the top home purchase lenders in this category were Huntington and Dollar Bank followed by First Federal of Lakewood, Fairway Independent Mortgage and TCF National Bank. Huntington was also the top lender among the three banks with Community Benefits Agreements (CBAs). Fifth Third made 8 loans and KeyBank made 5 (KeyBank was not in the top 15).

**Top 15 Lenders That Made Home Purchase Loans \$50,000 or less
on 1-4 Family Homes In East Side of Cleveland in 2020
Sorted by Loans Made**

Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Dollar Bank	16	14	88%	400,000	320,000	80%
Northpointe Bank	18	12	67%	740,000	480,000	65%
First Federal S&L - Lakewood	20	11	55%	660,000	375,000	57%
Huntington Bank	18	10	56%	630,000	380,000	60%
Crosscountry Mortgage	12	8	67%	470,000	320,000	68%
TCF National Bank	15	8	53%	585,000	300,000	51%
Fairway Independent Mortgag	11	7	64%	155,000	75,000	48%
Civista Bank	9	6	67%	365,000	230,000	63%
PrimeLending	10	6	60%	320,000	180,000	56%
Wells Fargo Bank	11	6	55%	405,000	220,000	54%
CBNA/Citizens	8	5	63%	240,000	175,000	73%
Lendus DBA RPM Mortgage	6	5	83%	230,000	185,000	80%
Third Federal S&L	8	5	63%	320,000	195,000	61%
Fifth Third Bank	5	4	80%	135,000	110,000	81%
Navy Federal Credit Union	8	4	50%	270,000	150,000	56%
Top 15 Total	175	111	63%	5,925,000	3,695,000	62%

In the East Side of City of Cleveland, where 19 of 20 neighborhoods are low or moderate income, and 80% of the population is African American, the overall lending in this category is low. Dollar Bank was the leading lender in this category, followed by Northpointe Bank, First Federal of Lakewood and Huntington. Fifth third made 4 loans, KeyBank made 3, and did not rank in this list of the top 15 lenders. 49

**Top 15 Lenders That Made Home Purchase Loans \$50,000 or less
on 1-4 Family Homes In East Inner Suburbs in 2020
Sorted by Loans Made**

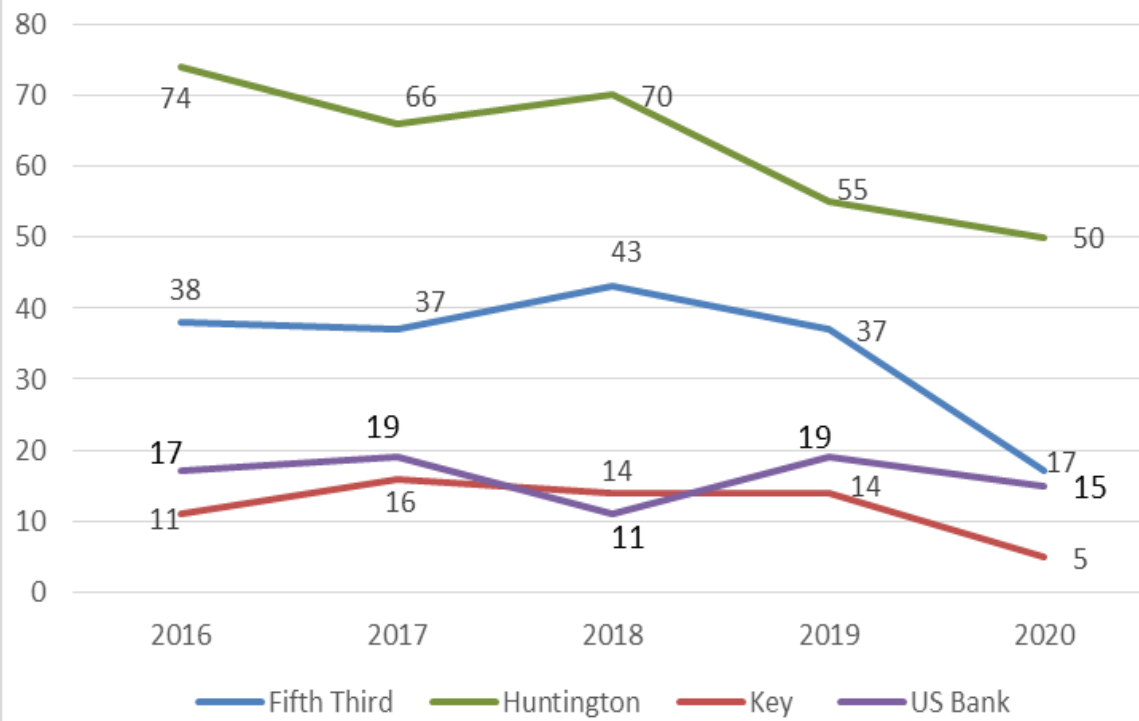
	Loans Applied For			Dollars Applied For		
Lender (CBA Lender in red)	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Fairway Independent Mortgage	27	18	67%	445,000	240,000	54%
Huntington Bank	23	17	74%	875,000	645,000	74%
US Bank	14	5	36%	550,000	185,000	34%
Fifth Third Bank	7	4	57%	265,000	160,000	60%
First Federal S&L - Lakewood	11	4	36%	445,000	170,000	38%
First National Bank of PA	7	4	57%	315,000	180,000	57%
Wells Fargo Bank	7	4	57%	295,000	160,000	54%
Crosscountry Mortgage	6	3	50%	210,000	135,000	64%
Dollar Bank	5	3	60%	115,000	35,000	30%
PNC Bank	6	3	50%	220,000	105,000	48%
TCF National Bank	8	3	38%	310,000	105,000	34%
Third Federal S&L	6	3	50%	220,000	115,000	52%
Carrollton Bank	2	2	100%	90,000	90,000	100%
CBNA/Citizens	3	2	67%	105,000	80,000	76%
First Centennial Mortgage	2	2	100%	90,000	90,000	100%
Top 15 Total	134	77	57%	4,550,000	2,495,000	55%

In the East Inner Suburbs, where 4 of 11 suburbs are low or moderate income, and 52% of the population is African American, Fairway Independent Mortgage was the leader in making loans at \$50,000 or below. Huntington was second followed by US Bank and Fifth Third. KeyBank received only 1 application and made no home purchase loans \$50,000 or less in the East Inner Suburbs.

CBA Lenders – Loans \$50,000 Or Less

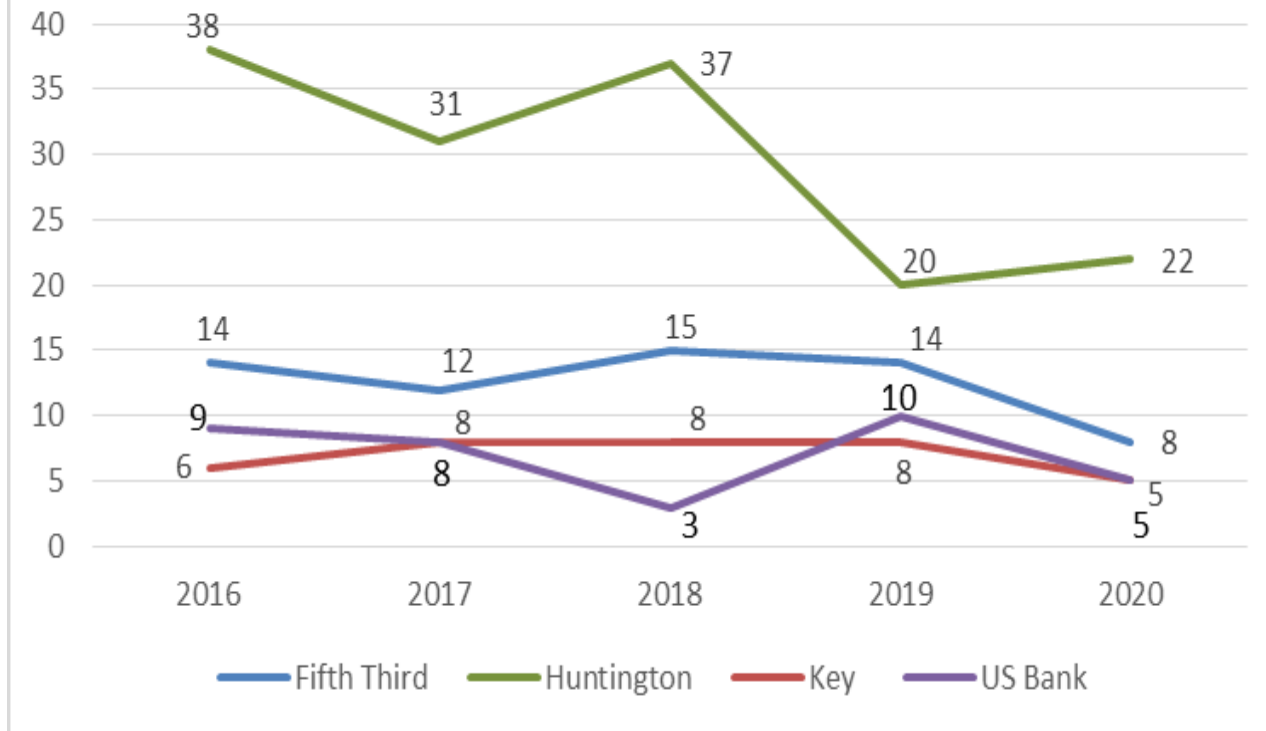
2016 – 2017 – 2018 -2019 – 2020

Home Purchase Loans at \$50,000 and Below In Cuyahoga County CBA Lenders and US Bank 2016-2017-2018-2019-2020



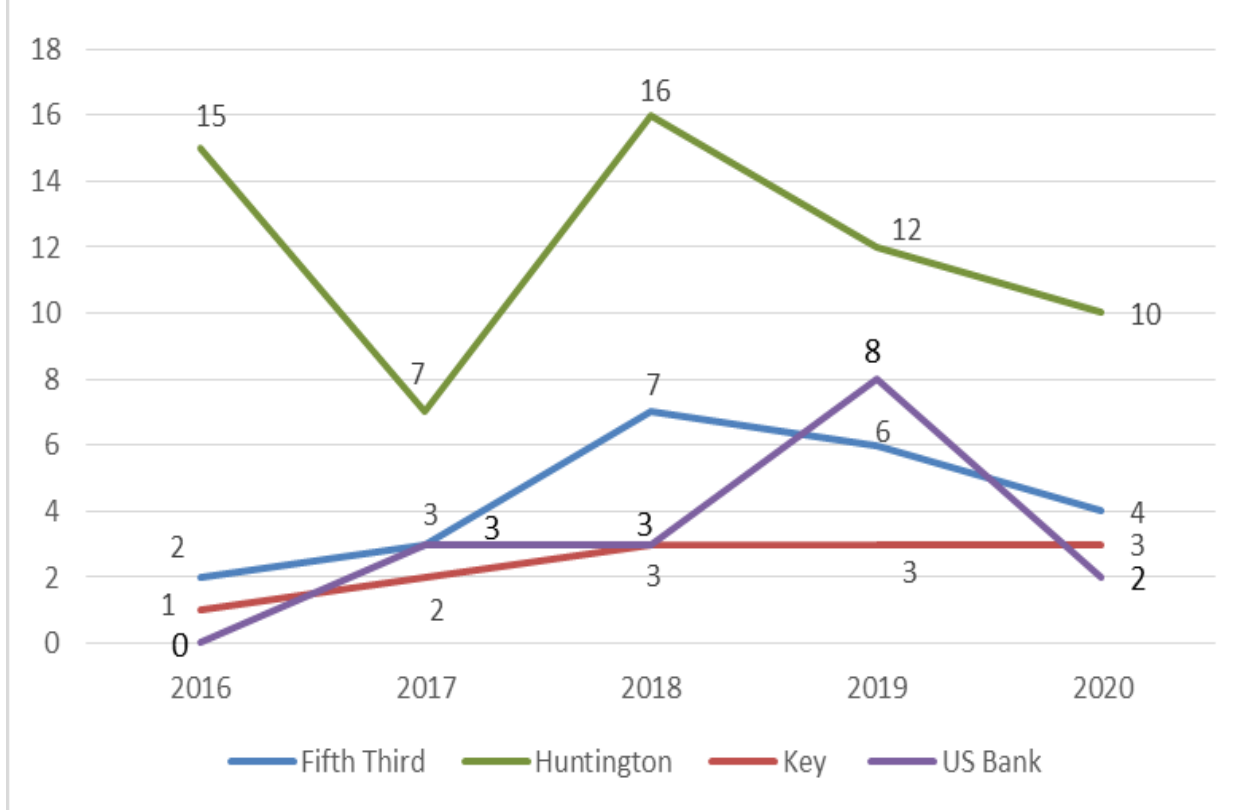
County-wide each of the three CBA lenders saw a decrease in home purchase loans at \$50,000 or less during the 5 year period. However, Huntington's volume was consistently higher than that of KeyBank and Fifth Third.

Home Purchase Loans at \$50,000 and Below In Cleveland CBA Lenders and US Bank 2016-2017-2018-2019-2020



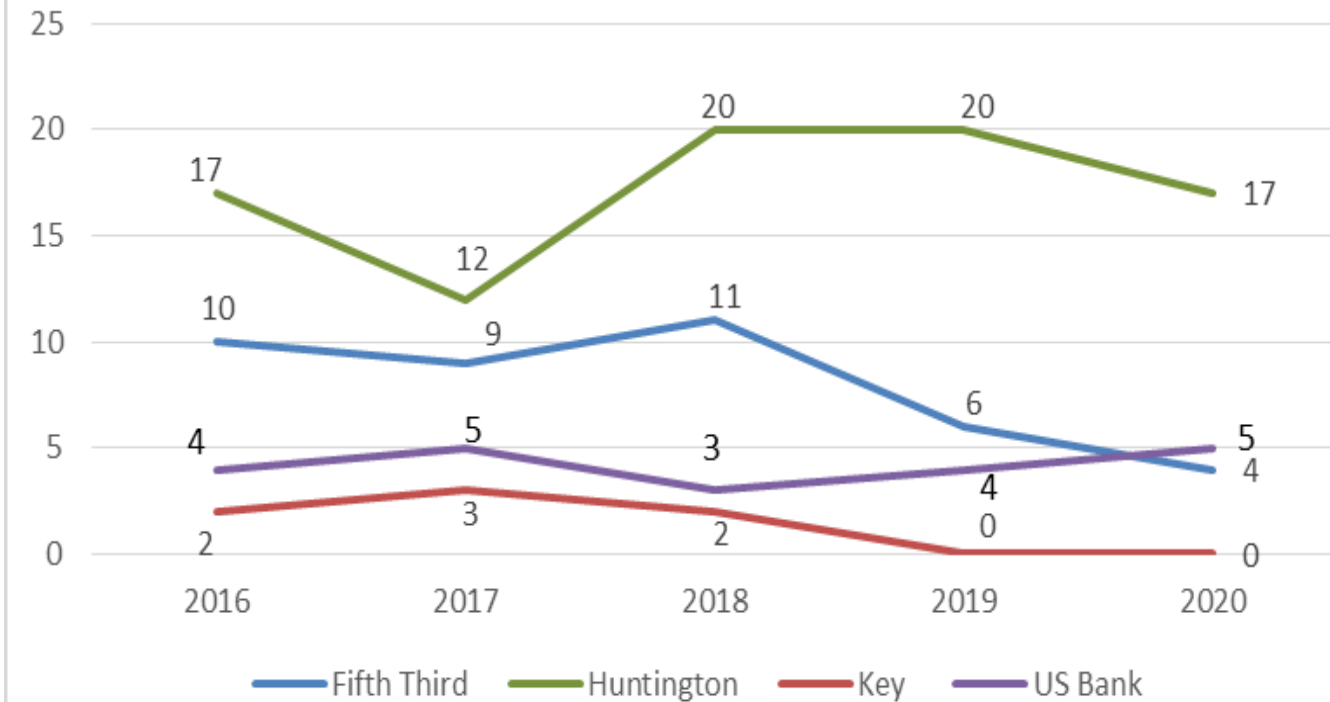
In the City of Cleveland neither Fifth Third nor KeyBank made any significant increase with respect to home purchase loans at \$50,000 or less. Huntington's volume decreased throughout the 5 year period – but was still more than double the volume of Fifth Third and KeyBank.

Home Purchase Loans at \$50,000 and Below In East Side of Cleveland CBA Lenders and US Bank 2016-2017-2018-2019-2020



In the East Side of Cleveland the number of loans at \$50,000 or less made by the three CBA lenders was very low and, as noted earlier, Huntington’s volume continued to drop, though it remained more than double the volume of Fifth Third and KeyBank. There is a significant unmet need for small dollar lending in the East Side of Cleveland.

Home Purchase Loans at \$50,000 and Below In East Inner Suburbs CBA Lenders and US Bank 2016-2017-2018-2019-2020



As with the East Side of Cleveland, the number of loans at \$50,000 or less made by the three CBA lenders in the East Inner Suburbs was also low, although Huntington continues to be the leader among CBA lenders. Fifth Third's volume in this category in the East Inner Suburbs ended the 5 year period with fewer loans than made at the beginning. Likewise, KeyBank ended the 5 year period with 0 loans in this category.

LOW & MODERATE INCOME LENDING

A Review of the Top 15 Lenders To Low and Moderate Income Borrowers Countywide

2016 – 2017 – 2018 – 2019 – 2020

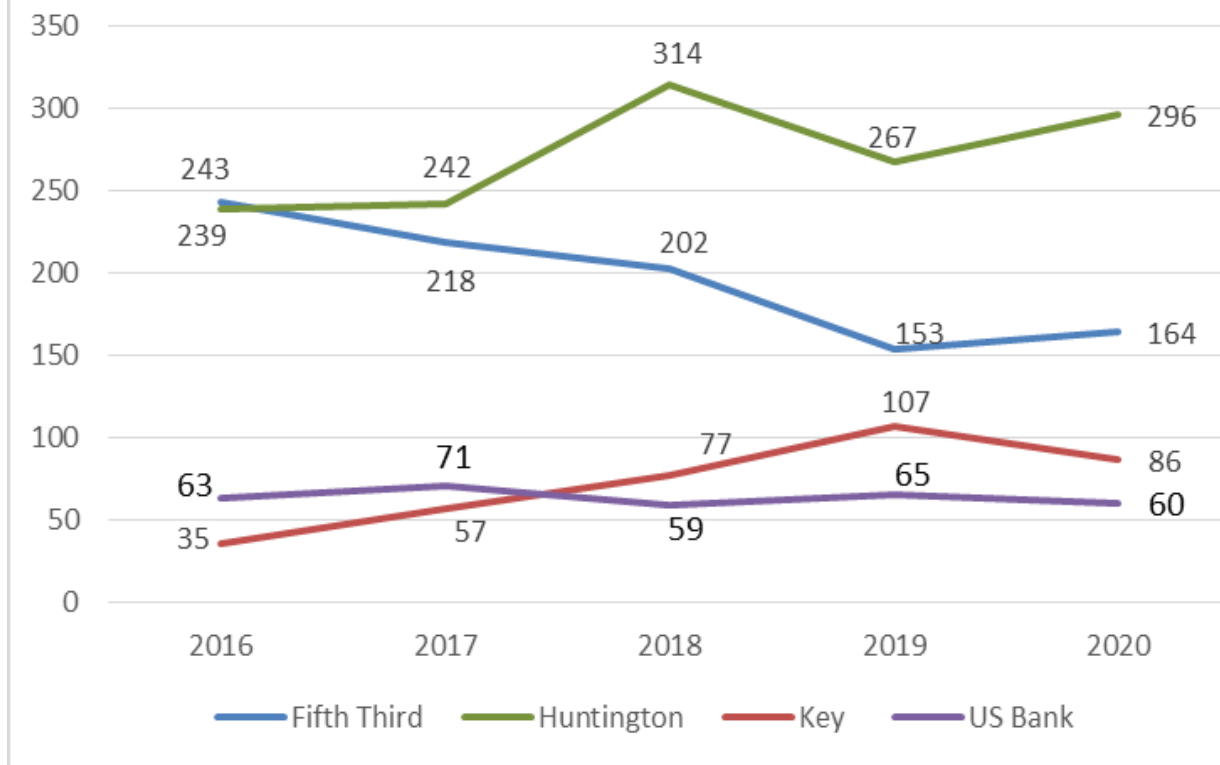
*Low and Moderate Income = Below 80% of
Cuyahoga Median Family Income (\$66,174)
= below \$52,939.*

**Top 15 Lenders That Made Home Purchase Loans to Low and Moderate Income Borrowers
(Below 80% of Cuyahoga median family income of \$66,174 = below \$52,939)
1-4 Family Homes In Cuyahoga County in 2020
Sorted by Loans Made**

Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Crosscountry Mortgage	760	600	79%	90,480,000	71,910,000	79%
Huntington Bank	419	296	71%	44,115,000	31,810,000	72%
Quicken Loans	322	239	74%	35,780,000	27,135,000	76%
Third Federal S&L	264	205	78%	27,440,000	21,165,000	77%
Howard Hanna Mortgage	249	199	80%	30,665,000	24,615,000	80%
Fairway Independent Mortgage	250	184	74%	25,740,000	19,370,000	75%
Fifth Third Bank	211	164	78%	23,865,000	18,320,000	77%
Liberty Home Mortgage	160	115	72%	18,340,000	13,325,000	73%
American Midwest Mortgage	133	114	86%	16,045,000	13,870,000	86%
First Federal S&L - Lakewood	161	112	70%	18,875,000	13,530,000	72%
Lendus DBA RPM Mortgage	138	112	81%	15,100,000	12,480,000	83%
CBNA/Citizens	153	110	72%	15,845,000	11,760,000	74%
Dollar Bank	149	98	66%	13,835,000	8,930,000	65%
Nations Lending	100	88	88%	14,120,000	12,360,000	88%
Freedom Mortgage	124	87	70%	13,370,000	9,315,000	70%
Top 15 Total	3593	2723	76%	403,615,000	309,895,000	77%

In 2020 CrossCountry Mortgage made twice as many home purchase loans to low and moderate income borrowers as any other lender. Huntington was second, followed by Quicken Loans, Third Federal, Howard Hanna, Fairway Independent and Fifth Third. KeyBank had ranked 12th in 2019 with 107 loans, but in 2020 has dropped from the top 15 with 86 loans.

Home Purchase Loans - Cuyahoga County Low and Moderate Income Borrowers CBA Lenders and US Bank 2016-2017-2018-2019-2020



Huntington increased its lending to low and moderate income borrowers throughout the county during the 5 year period. KeyBank’s volume has been significantly lower than the other two CBA lenders, but it did double its output of loans to low and moderate income borrowers by 2020. Fifth Third’s lending to low and moderate income borrowers in Cuyahoga County declined continuously during the first 4 years of the 5 year term. It increased slightly in 2020 but overall ended the 5 year term below where it began in 2016.

BANK DEPOSITS

How Are **Bank Deposits**

Being Loaned Back Into the County?

A Comparison of Dollars on Deposit To Dollars Loaned In 2020

**Cuyahoga Deposits Held by Banks as of June 30, 2020
and Loans for Purchase, Home Repair or Refi on 1-4 Family Homes**
(These 13 banks hold 99% of all Cuyahoga deposits)

Bank (Community Benefits Lenders in red)	No. of Branches / Offices	Cuyahoga County Deposits (\$000) as of 6/30/20 ↓	Market Share of Cuyahoga Deposits	Dollars Loaned in Cuyahoga in 2020 (\$000)	% of Deposits Loaned In Cuyahoga County
Keybank	49	30,470,716	38.10%	337,435	1.11%
PNC Bank	44	10,695,869	13.37%	231,295	2.16%
CBNA/Citizens	38	9,529,810	11.91%	204,240	2.14%
Huntington	58	7,693,297	9.62%	577,405	7.51%
Third Federal S&L	14	4,923,713	6.16%	545,380	11.08%
Fifth Third Bank	31	4,032,679	5.04%	243,695	6.04%
Chase Bank	23	3,420,126	4.28%	198,685	5.81%
US Bank	36	2,528,785	3.16%	107,580	4.25%
Dollar Bank	21	1,886,521	2.36%	121,065	6.42%
New York Community Bank	20	1,677,956	2.10%	-	0.00%
First Federal S&L- Lakewood	14	1,253,206	1.57%	337,300	26.91%
First National Bank Of PA	9	591,038	0.74%	140,995	23.86%
TCF National Bank	2	470,178	0.59%	24,975	5.31%
Totals		79,173,894		3,070,050	3.88%

Source: Federal Deposit Insurance Corporation (FDIC). The average reinvested by banks in 2020 was 3.88%. KeyBank, PNC and CBNA/Citizens were the largest holders of deposits, yet they each loaned less than the average. The next 6 largest holders of deposits: Huntington, Third Federal, Fifth Third, Chase, US Bank, and Dollar Bank, loaned more than the average. New York Community Bank, formerly Ohio Savings, reinvested none of its deposits on 1-4 family property in Cuyahoga County in 2020. Two smaller depository banks, First Fed of Lakewood and First National of PA, loaned a disproportionately large share of deposits back into the community.