



PUBLIC DISCLOSURE

January 31, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

United Midwest Savings Bank, National Association
Charter Number: 25160

6460 Busch Boulevard
Suite 200
Columbus, OH 43229

Office of the Comptroller of the Currency

Central Ohio – Indiana Field Office
655 Metro Place South, Suite 625
Dublin, OH 43017

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the state ratings and the following overall conclusions:
 - The loan-to-deposit (LTD) ratio is more than reasonable.
 - United Midwest Savings Bank, National Association (United Midwest or the bank) exhibits reasonable geographic distribution of loans in the Ohio assessment areas (AAs), given the bank's non-traditional business model discussed below under the "Description of Institution" section.
 - The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes in the Ohio AAs, given the bank's non-traditional business model.
 - In California and Texas, small business lending distributions by gross annual revenues are reasonable.
 - United Midwest has not received any complaints about its Community Reinvestment Act (CRA) performance in helping to meet the AAs' credit needs during the evaluation period.
 - The bank originated five community development (CD) loans totaling approximately \$602,545 in the Ohio AAs, all to affordable housing focused non-profit organizations. Overall, the bank's CD lending represents adequate responsiveness to CD lending needs in the Ohio AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable.

The bank's quarterly average LTD ratio over the 12 quarters since the previous CRA evaluation (December 31, 2018 to September 30, 2021) is 87.7 percent. The ratio ranged from a high of 108.5 percent at September 30, 2020, to a low of 72.2 percent at March 31, 2019. The bank's quarterly average LTD ratio of 87.7 percent is more than reasonable when compared to financial institutions of similar size in the bank's AAs, which includes 13 financial institutions with total assets less than \$1 billion and that are headquartered in one of the bank's AAs. The other 13 financial institutions have an average LTD ratio of 75.2 percent. United Midwest was ranked fourth highest out of the similarly situated financial institutions in the AAs for average LTD ratio during the evaluation period.

Lending in Assessment Area

A substantial majority of the bank's loans are outside its AAs.

The bank originated and purchased 1.2 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	102	96.2	4	3.8	106	16,779	98.1	322	1.9	17,101
Small Business	63	2.3	2,643	97.7	2,706	18,853	3.2	573,317	96.8	592,170
Consumer	255	0.8	31,745	99.2	32,000	1,534	1.1	144,317	98.9	145,851
Total	420	1.2	34,392	98.8	34,812	37,166	4.9	717,956	95.1	755,122

Source: 01/01/18 – 12/31/20 Bank Data.
Due to rounding, totals may not equal 100.0%.

Because a random sample of 20 small business and 20 consumer loans would yield an insignificant number of loans to borrowers within the AAs, the Office of the Comptroller of the Currency (OCC) completed a portfolio wide analysis of lending in the AAs using the bank's internal loan reports from 2018 to 2020. The above table displays the total number and dollar volume of loans made in any of the bank's AAs for the primary products during 2018, 2019, and 2020. The percentages are similar to the CRA Performance Evaluation dated November 28, 2018.

Despite the low volume of lending within the AAs, performance within the AAs is overall adequate. United Midwest's non-traditional business model and community development lending activities within the Ohio AAs mitigate the results of the In/Out analysis and overall low volume of lending in the AAs.

Analysis of peer data and active institutions in each AA indicates that the communities are not lacking access to financial services. United Midwest has a small percentage of deposit market share in relation to its competitors in each AA.

Lending activity, both inside and outside the AAs, increased substantially from the previous CRA performance evaluation, which analyzed lending activities in 2015, 2016, and 2017. During the prior evaluation, the bank originated 146 consumer and nine small business loans inside the AAs. Home mortgage lending was not analyzed at the previous evaluation.

In April 2018, United Midwest re-entered the residential lending market on a limited basis to originate home mortgage loans in the bank's Ohio AAs, focusing on originating home mortgage loans to low- and moderate-income (LMI) borrowers and/or in LMI geographies. The volume increased in 2019 and 2020. Additionally, the bank developed a mortgage product, MyPlace, that benefits LMI borrowers, which is discussed below in the performance evaluation. The bank advertises this product locally in the Ohio AAs and considers home mortgage lending a primary product in the Ohio AAs. Home mortgage loans are not offered nationwide.

During the evaluation period, United Midwest originated five CD loans totaling approximately \$602,545 in the Ohio AAs, which are described further below under the Lending Test.

Description of Institution

United Midwest is a national bank and a wholly owned subsidiary of MSB Capital Corporation, a one-bank holding company. The bank is headquartered in DeGraff, Ohio, in Logan County, and the holding company is headquartered in Columbus, Ohio, in Franklin County. As of December 31, 2020, total assets were \$382 million with \$286 million in net loans and leases, \$297 million in total deposits, and

\$35 million in tier 1 capital. There is no merger or acquisition activity that affects the scope of the bank's operations during the evaluation period.

United Midwest operates the main office in DeGraff, Ohio, in Logan County. The bank has one office in West Manchester, Ohio, in Preble County. The bank has three branches in Franklin County, Ohio, two in Columbus and one in Westerville. The Columbus Branch on Broad Street was opened on February 1, 2018, and the Westerville Branch was opened on November 15, 2018. The opening of the branches did not impact the bank's AAs. All offices are in middle- and upper-income census tracts (CTs) except for the Columbus, Ohio branch on Reed Road, which is in a moderate-income CT. All offices have drive-up facilities, except for the West Manchester Branch. All have 24-hour automated teller machines (ATMs) except for the Columbus Branch on Reed Road. The bank maintains standard operating hours at all branches, including Saturday hours. Additionally, United Midwest has one loan production office (LPO) in Cleveland, Ohio for consumer loan originations and one LPO in Panama City, Florida for smaller Small Business Administration (SBA) loan originations. No offices were closed in Ohio during the evaluation period.

The bank closed (sold real estate and deposits) the branch office in Lake Mary, Florida, in Seminole County on September 20, 2019. However, it was under contract to sell as of April 26, 2019. This branch was in an upper-income CT. Seminole County is mostly a suburban county in the Orlando-Kissimmee-Sanford, FL Metropolitan Statistical Area (MSA). As of the June 30, 2019, Federal Deposit Insurance Corporation (FDIC) deposit market share report, the bank's deposit market share in Seminole County was 0.7 percent, ranking 20th out of 26 financial institutions. The market is dominated by large banks. There were no Saturday hours at this branch; however, there was an ATM available. As of this performance evaluation, the OCC included a lending analysis of the Florida AA for years 2018 and 2019 only.

United Midwest was an interstate financial institution with three AAs and two rating areas (Ohio and Florida) during the evaluation period. The AAs are also described in the "Scope of the Evaluation," "Description of Institution's Operations in Ohio," and "Description of Institution's Operations in Florida" sections of this performance evaluation. The AAs are as follows:

- Franklin County, Ohio, in the Columbus, OH MSA 18140 (Columbus MSA AA).
- Champaign, Darke, Logan, and Preble counties in Ohio in a Non-MSA (Non-MSA AA).
- Seminole County, Florida, in the Orlando-Kissimmee-Sanford, FL MSA 36740 (Florida AA) for 2018 and 2019 only.

Presently, no legal or financial impediments exist that could restrict or affect United Midwest's ability to meet the credit needs of its AAs. The bank's previous CRA performance evaluation was dated November 28, 2018, and resulted in a Satisfactory rating.

As of the December 31, 2020, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Reports (UBPR), United Midwest's total loans were approximately \$292 million representing 76 percent of total assets. The bank offers a variety of lending and deposit products and services through its five offices to accommodate its customers, including business, home mortgage, and consumer loans, as well as online and mobile banking. The bank's deposits are gathered from communities surrounding the branch offices in a traditional manner. However, loan operations are not traditional in nature. United Midwest's lending model is to originate two specialty products to a nationwide market, mostly through third-party sources. The primary products are highly specialized niches within the commercial and consumer loan markets.

The bank's primary business focus is commercial and consumer loans on a nationwide basis, and home mortgage loans within their Ohio AAs. The bank's loan portfolio, as of the December 31, 2020, Call Report, is comprised of commercial and commercial real estate loans (business) of 70 percent, consumer loans of 18 percent, residential real estate (home mortgage) loans of 11 percent, and approximately 1 percent in other loans.

Commercial Lending

The primary lending activity is focused on commercial loans that qualify for partial guarantees through various U.S. government lending programs such as the SBA or U.S. Department of Agriculture (USDA). A substantial majority of the loans originated during the evaluation period were SBA 7(a) program loans. Due to the specialized credit markets in which the bank participates, the borrower base is nationwide with no apparent geographic concentrations.

The bank has two SBA lending operations: a large loan SBA lending operation focusing on SBA guaranteed loans of \$350,000 or more to businesses in certain industries, and a small SBA lending operation focusing on SBA guaranteed loans of \$150,000 or less to borrowers primarily for start-ups. SBA loan applications are generally through national referral sources. According to the National Association of Government Guaranteed Lenders, in 2020 United Midwest was ranked 8th largest lender in the nation for total number of SBA loans approved and 12th largest in total dollar volume of SBA approved loans, behind large banks including Huntington National Bank, U.S. Bank, National Association (N.A.), and Wells Fargo Bank, N.A.

The COVID-19 pandemic in 2020 impacted the national and local economy. As a result, the bank provided SBA Paycheck Protection Program (PPP) loans to help businesses keep their workforces employed. The bank originated 697 SBA PPP loans totaling \$42 million. Of the 697 PPP loans, 32 loans were originated in the Columbus MSA AA and seven were originated in the Non-MSA AA. Additionally, 74 loans were originated in other areas of Ohio and 584 loans in other states.

Consumer Lending

Similar to the commercial line of business, the consumer loan portfolio consists of a nationwide borrowing base and a narrow niche market. Consumer lending focuses on loans to individuals for purchase of certain goods and services from approved dealers and retailers nationwide. The majority of the loans are to finance small dollar loans to purchase pianos, band instruments, and safes. During the evaluation period, approximately 77 percent of the consumer loan originations were to finance pianos, band instruments, and safes. United Midwest uses third-party sources to help establish relationships with vendors. Thus, the bank must maintain a national borrowing base to originate the types of loans management and the Board find desirable. A small number of traditional consumer loans have been originated through the bank's local retail branch network as well.

Residential Real Estate Lending

Residential real estate lending (home mortgage) was largely discontinued from about 2009 to 2017. In April 2018, United Midwest re-entered the residential lending market on a limited basis by hiring a small residential lending staff to re-introduce and originate mortgage loans in the bank's Ohio AAs, focused on making loans to LMI borrowers and in LMI areas. For this purpose, the bank developed a product, MyPlace, that benefits LMI borrowers. The product has a lower than market interest rate, with

lender paid closing costs and a higher loan to value, with no private mortgage insurance requirement. MyPlace is specifically designed to assist LMI families with purchasing or refinancing a home within the bank's Ohio AAs. During the evaluation period, the bank originated 106 home mortgage loans, with 102 in the bank's Ohio AAs. In 2019 and 2020, all the home mortgage loan originations were inside the Ohio AAs. Mortgage loan competition is very strong in the Ohio AAs, with competition from many large banks. Bank management considers home mortgage lending a primary product in the bank's Columbus MSA AA and Non-MSA AA, as the bank only originates mortgage loans in the Ohio AAs and not on a nationwide basis. Therefore, the OCC included home mortgage lending as a primary product during this evaluation in the Ohio AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The OCC used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2018, to December 31, 2020.

Based on discussions with management and the number and dollar volume of loan origination data supplied by the bank during the evaluation period, United Midwest's primary lending focus is small business and consumer lending on a nationwide basis, and home mortgage lending inside the Ohio AAs. Based on the dollar volume of originated and purchased loans during the evaluation period, business loans accounted for 78.4 percent, consumer loans accounted for 19.3 percent, and residential real estate loans accounted for 2.3 percent of total loan originations and purchases. Based on the number of originated and purchased loans during the evaluation period, business loans accounted for 7.8 percent, consumer loans accounted for 91.9 percent, and residential real estate loans accounted for 0.3 percent of total loan originations and purchases.

During the evaluation period, the top four states for business loan originations and purchases were Texas (12.2 percent), Florida (8.9 percent), Ohio (8.5 percent), and California (6.9 percent). Of the 231 total business loans originated and purchased in Ohio, 63 (or 27 percent) were in the Ohio AAs. During the evaluation period, the top four states for consumer loan originations and purchases were California (13.5 percent), Texas (9.7 percent), Florida (6.6 percent), and Washington (5.4 percent). Of the 1,156 total consumer loans originated and purchased in Ohio, 231 (or 20 percent) were inside the Ohio AAs. Since the majority of the loans are originated and purchased outside the AAs, the OCC included a limited-scope review of statewide lending in California and Texas. Refer to "Conclusions for Areas Receiving Limited Scope Reviews" below for more details.

The OCC evaluated the bank's lending performance based on the primary products, small business and consumer loans with a nationwide focus and home mortgage lending with an Ohio AA focus. While the bank offers other lending products, these products were not a primary product during the evaluation period. As a result, the OCC did not consider these as part of the performance evaluation, as an analysis of this data would not be meaningful.

To evaluate the bank's performance during the evaluation period, the OCC relied on internal bank reports for the small business, consumer, and home mortgage loans. For the lending analysis, the OCC transaction tested 60 loans for each primary product during the evaluation period as part of a data integrity examination to confirm the accuracy of the data in the internal bank reports. Bank controls

were deemed sufficient to allow for the reliance on the data in the reports (business revenues, borrower income figures, and location of the borrowers). The OCC noted no substantive deficiencies with the data. Therefore, the OCC used all small businesses, consumer, and home mortgage loans originated and purchased in the AAs for the lending analysis. The analysis includes a review of each primary product when sufficient volume (at least 20 loans) in an AA was present during the evaluation period of 2018, 2019, and 2020.

For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census data and Dun and Bradstreet (D&B) data as of June 2020. 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 of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank-delineated AAs located within the same MSA are combined and evaluated as a single AA. Similarly, bank-delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

United Midwest has three AAs, as described above. The OCC completed a full-scope review for each AA: Columbus MSA AA, Non-MSA AA, and the Florida AA. A community profile for the Columbus MSA AA and Non-MSA AA is provided in the "Description of Institution's Operations in Ohio" section of this evaluation and the Florida community profile is provided in the "Description of Institution's Operations in Florida" section.

Ratings

The bank's overall rating is a blend of the state ratings.

The bank's overall rating is based on all three AAs that received a full-scope review as well as the results of the lending analysis in the two states sampled (California and Texas). More weight was given to the bank's performance in Ohio than Florida. Seminole County, Florida, has relatively few LMI CTs given the large population. Further, approximately 78 percent of the bank's deposits were attributed to the Ohio branch network as of the June 30, 2019, FDIC Deposit Market Share Report (prior to the sale of the Florida branch). Of the loans originated and purchased inside the AAs for all three primary products, only 24 consumer loans were inside the Florida AA. The bank did not originate any small business loans inside the Florida AA during the evaluation period. Additionally, the Florida AA's only branch closed in 2019.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and

regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, 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 Ohio¹: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank’s geographic distribution of home mortgage loans, small loans to businesses, and consumer loans reflects an overall reasonable distribution.
- United Midwest’s distribution of home mortgage loans, small loans to businesses, and consumer loans reflects an overall reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- United Midwest has not received any complaints about its CRA performance in helping to meet the AAs’ credit needs during the evaluation period.
- United Midwest originated five CD loans totaling approximately \$602,545 in the Ohio AAs, all to affordable housing focused non-profit organizations. Overall, the bank’s CD lending represents adequate responsiveness to CD lending needs in the AAs.

Description of Institution’s Operations in Ohio

United Midwest has two AAs in Ohio, the Columbus MSA AA and the Non-MSA AA. The AAs meet the requirements of the CRA regulation and do not arbitrarily exclude any LMI areas. There are no designated distressed or underserved CTs in the AA.

Bank management selected the AAs based on the bank’s branch locations and the areas with the most deposit and lending activity. The bank is headquartered in Logan County in the Non-MSA AA. However, a majority of the lending and deposit activity is in the Columbus MSA AA, as discussed below.

Deposit operations in Ohio function in a traditional manner with most deposits obtained by bank personnel located in physical offices. Deposit market shares in both Ohio AAs are low, but the AAs are adequately served by other financial institutions as well. Competition from large banks in the Columbus MSA AA is substantial. Loan operations in Ohio do not vary substantially from the overall description of operations also provided in the “Description of Institution” section above.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Columbus MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Columbus MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	284	21.5	26.8	24.3	26.4	1.1
Population by Geography	1,215,761	14.7	26.2	26.6	31.4	1.1
Housing Units by Geography	536,811	16.4	26.7	26.6	30.0	0.3
Owner-Occupied Units by Geography	258,868	7.7	22.6	29.3	40.3	0.0
Occupied Rental Units by Geography	222,078	21.8	30.7	25.5	21.5	0.6
Vacant Units by Geography	55,865	35.4	29.4	18.3	16.2	0.7
Businesses by Geography	97,382	12.1	20.3	25.3	41.7	0.7
Farms by Geography	1,721	9.8	21.3	29.3	39.3	0.2
Family Distribution by Income Level	279,594	24.8	17.5	19.0	38.6	0.0
Household Distribution by Income Level	480,946	26.2	17.1	17.6	39.2	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$153,452
Median Household Income MSA – 18140 Columbus, OH MSA		\$57,948	Median Gross Rent			\$852
			Families Below Poverty Level			12.8%
			Households Below Poverty Level			15.4%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Columbus MSA AA includes Franklin County, Ohio, in its entirety. There are nine other counties in the Columbus MSA; however, they are not included in the bank's AA. The data in the above table is for Franklin County only. Franklin County is home to the city of Columbus and is larger in population than all other counties in the AA combined. Columbus, Ohio is the county seat of Franklin County. A majority of the bank's lending inside the AAs was in Franklin County, with 87 percent of the consumer lending in Ohio in the Columbus MSA AA, 85.7 percent of small business lending, and 53.9 percent of home mortgage lending in Ohio was in the Columbus MSA AA.

United Midwest has three branches in Franklin County, Ohio. The Westerville branch is in an upper-income CT, the East Broad Street Branch (Columbus) is in a middle-income CT, and the Reed Road Branch (Columbus) is in a moderate-income CT. As stated above, all have an ATM except the Reed Road Branch.

According to the 2015 ACS U.S. Census data, the population of the AA is 1,215,761, with 14.7 percent living in low-income CTs, 26.2 percent living in moderate-income CTs, 26.6 percent living in middle-income CTs, 31.4 percent living in upper-income CTs, and 1.1 percent living in geographies that have not been assigned an income classification. The AA population grew approximately 4.5 percent from the 2010 U.S. Census to the 2015 ACS U.S. Census. The AA includes 279,594 families and 480,946 households. The AA comprises 284 CTs, of which 21.5 percent are low-income, 26.8 are moderate-income, 24.3 percent are middle-income, 26.4 percent are upper-income, and 1.1 percent are in

geographies that have not been assigned an income classification. There were no CT classification changes during the evaluation period.

As stated above, United Midwest's primary business focus includes small business lending. Many of the businesses in the AA are small, as measured by the number of employees and gross annual revenues. According to the D&B data as of June 2020, 83.6 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 63.3 percent have fewer than five employees. Only 2.2 percent of the businesses are headquartered in the bank's AA, and 87.8 percent operate from a single location. As stated above, according to the National Association of Government Guaranteed Lenders, in 2020 United Midwest was ranked 8th largest lender in the nation for total number of SBA loans approved and 12th largest in total dollar volume of SBA approved loans. According to the 2020 Peer Small Business Data Market Share Report for the Columbus MSA AA, the top small business lenders were JPMorgan Chase Bank, N.A., Huntington National Bank, PNC Bank, N.A., and American Express National Bank, which accounted for almost 54 percent of the small business loan originations in the Columbus MSA AA. United Midwest is not included in the peer small business data report as the bank is not required to report CRA small business loan data.

Home mortgage lending is a primary business focus in the Ohio AAs. According to the 2020 Peer Mortgage Data Report, the top three lenders in the Columbus MSA AA were Huntington National Bank, Union Savings Bank, and JPMorgan Chase Bank, N.A. United Midwest was not included in the peer data report because they were not required to file Home Mortgage Disclosure Act (HMDA) data during the evaluation period.

Competition in the AA is strong due to the presence of many financial institutions, including large banks. Competitors with significant deposit market share at June 30, 2020, include Huntington National Bank, JPMorgan Chase Bank, N.A., PNC Bank, N.A., and Fifth Third Bank, N.A. These four banks account for approximately 80 percent of the total deposit market share in Franklin County. As of the June 30, 2020, FDIC's Deposit Market Share Report, there were 34 financial institutions operating 320 banking offices in Franklin County, including United Midwest. The June 30, 2020, FDIC deposit market share data shows United Midwest's \$170.3 million in total deposits in the AA ranks 16th in overall deposit market share at 0.2 percent. Additionally, 68 percent of the total deposits at June 30, 2020, were in the Columbus MSA AA (Franklin County).

During 2018 – 2019, the economic conditions in Franklin County were overall stable. The economy was trending up, the housing market was strong, and unemployment was at historically low levels. For 2020, COVID-19 was challenging to the economy with higher unemployment and a slowing housing market. The "not seasonally adjusted" unemployment rate in Franklin County as of December 2020 was 4.9 percent, which compared favorably with the Ohio unemployment rate of 5.2 percent and national rate of 6.5 percent (Ohio Department of Job and Family Services – Office of Workforce Development – Bureau of Labor Market Information).

The AA has a diverse employer base with many industries, from manufacturing and services to financial services and government industries. Major employers in Franklin County include The Ohio State University, OhioHealth, and the State of Ohio government.

As part of the CRA performance evaluation, the OCC reviewed information provided from interviews with representatives from affordable housing and/or CD organizations. The contacts identified affordable housing as a credit need in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

Non-MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	0.0	15.6	64.4	20.0	0.0
Population by Geography	178,915	0.0	14.6	65.5	19.9	0.0
Housing Units by Geography	80,451	0.0	16.2	65.9	17.9	0.0
Owner-Occupied Units by Geography	52,348	0.0	11.3	66.8	21.9	0.0
Occupied Rental Units by Geography	18,518	0.0	27.5	61.6	10.9	0.0
Vacant Units by Geography	9,585	0.0	21.1	69.1	9.9	0.0
Businesses by Geography	8,865	0.0	19.1	63.1	17.8	0.0
Farms by Geography	1,157	0.0	4.2	75.4	20.4	0.0
Family Distribution by Income Level	49,125	19.1	17.2	23.1	40.6	0.0
Household Distribution by Income Level	70,866	20.7	16.5	18.8	43.9	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$115,684
Median Household Income Non-MSAs - OH		\$48,531	Median Gross Rent			\$656
			Families Below Poverty Level			9.7%
			Households Below Poverty Level			12.1 %
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Non-MSA AA includes Champaign, Darke, Logan, and Preble Counties in Ohio. The data in the above table is for those counties only. United Midwest has two branches in the Non-MSA AA, a rural area of Ohio. The main office in DeGraff, Ohio is in a middle-income CT in Logan County. Since the DeGraff office is near Champaign County, both counties are included in the AA. The West Manchester branch is in Preble County in a middle-income CT. This branch is also near Darke County, so both counties are included in the AA. Both offices have an ATM. The demographics and economies of these four rural counties are substantially similar, so the OCC considered the four counties as one AA. No branches have been opened or closed in the Non-MSA AA during the evaluation period.

According to the 2015 ACS U.S. Census data, the population of the AA is 178,915, with 14.6 percent living in moderate-income CTs, 65.5 percent living in middle-income CTs, and 19.9 percent living in upper-income CTs. There are no low-income CTs in the Non-MSA AA. The AA comprises 45 CTs, of which 15.6 are moderate-income, 64.4 percent are middle-income, and 20 percent are upper-income CTs. The AA includes 49,125 families and 70,866 households. There were two CT classification changes during the evaluation period. In Champaign County, CT 101 changed from middle-income to upper-income. In Preble County, CT 4701.01 changed from middle-income to upper-income. These were the only changes since the previous evaluation. The CT classification changes were appropriately accounted for in the tables in appendix D.

A majority of the bank's lending inside the Ohio AAs was in Franklin County; however, 13 percent of the consumer lending was in the Non-MSA AA, 14.3 percent of small business lending, and 46.1 percent of home mortgage lending was in the Non-MSA AA. As stated above, United Midwest's primary business focus includes small business lending. Many of the businesses in the AA are small as measured by the number of employees and gross annual revenues. According to the D&B data as of June 2020, 80.9 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 67.5 percent have fewer than five employees. Only 2.3 percent of the businesses are headquartered in the bank's AA, and 87.3 percent operate from a single location. According to the 2020 Peer Small Business Data Market Share Report, the top small business lenders in the Non-MSA AA were Park National Bank, American Express National Bank, Synchrony Bank, and JPMorgan Chase Bank, N.A., which accounted for almost 45 percent of the small business loan originations. United Midwest is not included in the peer small business data report as the bank is not required to report CRA small business loan data.

Home mortgage lending is a primary business focus in the Ohio AAs. According to the 2020 Peer Mortgage Data Report, the top three lenders in the Non-MSA AA were Park National Bank, Quicken Loans, LLC, and Huntington National Bank. United Midwest was not included in the peer data report because they were not required to file HMDA data during the evaluation period.

Competition in the AA is strong due to the presence of many financial institutions, including large banks. Competitors with significant deposit market share at June 30, 2020, include Park National Bank, Greenville National Bank, Perpetual Federal Savings Bank of Urbana, Civista Bank, and Huntington National Bank. These five banks account for approximately 43 percent of the total deposit market share in the Non-MSA AA. As of the June 30, 2020, FDIC's Deposit Market Share Report, there were 30 financial institutions operating 72 banking offices in the Non-MSA AA, including United Midwest. The June 30, 2020, FDIC deposit market share data shows United Midwest's \$80.2 million in total deposits in the AA ranks 16th in overall deposit market share at 2.3 percent. Additionally, 32 percent of the total deposits at June 30, 2020, were in the Non-MSA AA.

During 2018 – 2019, the economic conditions in the Non-MSA AA were overall stable. The economy was trending up, the housing market was stable, and unemployment was at historically low levels. For 2020, COVID-19 was challenging to the economy with higher unemployment and a slowing housing market. The "not seasonally adjusted" unemployment rates as of December 2020 were 4.1 percent in Champaign County, 4.2 percent in Darke County, 4.3 percent in Logan County, and 4.2 percent in Preble County, which compare favorably with the Ohio unemployment rate of 5.2 percent and national rate of 6.5 percent (Ohio Department of Job and Family Services – Office of Workforce Development – Bureau of Labor Market Information).

The AA has a diverse employer base with many industries, from manufacturing and services to government and agriculture. Major employers in Champaign County include KTH Parts Industries, Inc., Rittal Corporation, and Honeywell International Inc. Primary employers in Darke County include Whirlpool Corporation, Midmark Corporation, and Greenville Technology, Inc. Major employers in Logan County include Honda of America Manufacturing, Inc., Honda Transmission Manufacturing, Inc., Midwest Express, and county and city government. Large employers in Preble County include Neaton Auto Parts, Parker-Haniffin Corporation, and Henny Penny Corporation.

As part of the CRA performance evaluation, the OCC reviewed information provided from interviews with representatives from affordable housing and/or CD organizations. The contacts identified

affordable housing as a credit need in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

Scope of Evaluation in Ohio

The OCC performed full-scope reviews of the Columbus MSA AA and Non-MSA AA. The data in these AAs were analyzed and presented as two separate AAs for purposes of this performance evaluation. Small business, consumer, and home mortgage lending (within the Ohio AAs only for home mortgage lending) are the bank's primary products and were evaluated under the Lending Test. As discussed above, the OCC placed more weight on the Ohio AAs, given the majority of the consumer, small business, and home mortgage lending and deposits were in the Ohio AAs. Refer to the "Scope of the Evaluation" section for more details.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Columbus MSA AA and Non-MSA AA is adequate.

Home mortgage lending is a primary product in the Ohio AAs only. During the evaluation period, there was an insufficient number on small loans to businesses in the Non-MSA AA for a meaningful analysis.

During the evaluation period, United Midwest originated five CD loans totaling approximately \$602,545 in the Ohio AAs, all to affordable housing focused non-profit organizations. Four CD loans were originated in the Columbus MSA AA totaling \$452,545, representing 1.9 percent of prorated tier 1 capital based on total deposits as of December 31, 2020. One loan was originated in the Non-MSA AA totaling \$150,000, which equates to 1.3 percent of prorated tier 1 capital. Overall, the bank's CD lending represents adequate responsiveness to CD lending needs in the AAs.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State.

Home Mortgage Loans

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

The bank exhibits an excellent geographic distribution of home mortgage loans in both AAs.

Columbus MSA AA

United Midwest exhibits an excellent distribution of home mortgage loans in the Columbus MSA AA. The percentage of home mortgage loans originated and purchased by the bank in the LMI CTs significantly exceeds both the demographic comparator and the aggregate lending data of other HMDA reporters, demonstrating overall excellent performance.

Non-MSA AA

United Midwest exhibits an excellent distribution of home mortgage loans in the Non-MSA AA. The percentage of home mortgage loans originated and purchased by the bank in the moderate-income CTs significantly exceeds both the demographic comparator and the aggregate lending data of other HMDA reporters, demonstrating excellent performance. There are no low-income CTs in the Non-MSA AA.

Small Loans to Businesses

Refer to Table Q in the State of Ohio section of 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 OCC compared the percentage of the number of small loans to businesses originated by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of businesses throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to businesses of other lenders (aggregate data), as demonstrated by CRA aggregate data.

The bank exhibits a reasonable geographic distribution of small loans to businesses in the Columbus MSA AA.

Columbus MSA AA

United Midwest exhibits an overall reasonable distribution of small loans to businesses in the Columbus MSA AA. The percentage of small loans to businesses originated and purchased by the bank in the low-income CTs is below demographic and aggregate data. However, the percentage of small loans to businesses originated and purchased by the bank in the moderate-income CTs significantly exceeds both the demographic and aggregate data, reflecting overall reasonable performance. There is strong competition for loans in the Columbus MSA AA, with approximately 54 percent of the small loans to businesses originated or purchased by four large banks during the evaluation period in the Columbus MSA AA.

Non-MSA AA

During the evaluation period, United Midwest originated eight small loans to businesses, which is insufficient for a meaningful analysis.

Consumer Loans

Refer to Table U in the State of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The OCC compared the percentage of the number of consumer loans originated by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the percentage distribution of households in those geographies (demographic data), placing emphasis on the LMI geographies.

The bank exhibits an overall reasonable geographic distribution of consumer loans, given the bank's non-traditional business model. The OCC noted that most consumer loans are obtained through third-party sources who have relationships with the product or service provider. Consequently, the bank's ability to effectively target a market based on geographic considerations is more limited than for a traditional bank.

Columbus MSA AA

Given United Midwest's non-traditional business model, the distribution of consumer loans in the Columbus MSA AA is reasonable. The percentage of consumer loans originated and purchased by the bank in low-income CTs is significantly below demographic data (percentage of households). However, the percentage of consumer loans originated and purchased by the bank in moderate-income CTs is below demographic data but is overall reasonable. The bank originated or purchased six loans to borrowers in low-income CTs and 40 loans to borrowers in moderate-income CTs during the evaluation period in the Columbus MSA AA.

The OCC also considered other factors in the bank's performance during the review, including that 36.8 percent of the households in the low-income CTs in the Columbus MSA AA live below poverty and 19.4 percent of the households in moderate-income CTs in the AA live below poverty.

Non-MSA AA

Distribution of consumer loans in the Non-MSA AA is poor. United Midwest did not originate or purchase any consumer loans in the moderate-income CTs during the evaluation period in the Non-MSA AA. Given the bank's non-traditional business model and reliance on third-party sources for originations, these factors prevented geographic loan distribution in the Non-MSA AA from being very poor. As most consumer loans are originated in the Columbus MSA AA, more reliance was placed on the Columbus MSA AA for the evaluation.

The OCC also noted that 20.7 percent of the households in the moderate-income CTs in the Non-MSA AA live below poverty. There are no low-income CTs in the Non-MSA AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank and the bank's non-traditional business model.

The bank lending performance in the AAs was supplemented by the origination of five CD loans, totaling \$602,545, as discussed above.

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 OCC compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

United Midwest's distribution of home mortgage loans by borrower income level reflects overall excellent distribution.

Columbus MSA AA

United Midwest's distribution of home mortgage loans by borrower income level in the Columbus MSA AA reflects excellent distribution. The bank's percentage of home mortgage loans to low-income borrowers exceeds aggregate lending data but is below demographic data. The bank's percentage of home mortgage loans to moderate-income borrowers significantly exceeds both demographic and aggregate lending data of other HMDA reporters.

Non-MSA AA

The bank's distribution of home mortgage loans by borrower income level in the Non-MSA AA reflects overall excellent distribution. The bank's percentage of home mortgage loans to low-income borrowers is below both aggregate and demographic data but is overall reasonable. The bank's percentage of home mortgage loans to moderate-income borrowers exceeds both demographic and aggregate lending data of other HMDA reporters.

The OCC considered other factors in the bank's performance during the review, including that 9.7 percent of the families live below poverty and there is strong competition for loans in the AA.

Small Loans to Businesses

Refer to Table R in the State of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The OCC compared the percentage distribution of the number of small loans to businesses originated by the bank by gross annual revenue level to businesses with gross annual revenues of \$1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small business data, as demonstrated by CRA aggregate data.

United Midwest exhibits a reasonable distribution of small loans to businesses of different sizes.

Columbus MSA AA

United Midwest exhibits a reasonable distribution of small loans to businesses of different sizes within the Columbus MSA AA. As evidenced in Table R in the State of Ohio section of appendix D, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeds aggregate lending data, but is below the percentage of businesses with gross annual revenues of \$1 million or less (demographic data). However, 35.4 percent of the loans did not have income available, with most of these loans being SBA PPP loans that did not require the disclosure of gross annual revenues. The majority of the bank's small loans to businesses are SBA loans for start-ups, which have gross annual revenues under \$1 million.

In the lending analysis, the OCC considered performance context factors, including strong competition in the AA. Additionally, the top small business lenders in the AA were large banks, including JPMorgan Chase Bank, N.A., Huntington National Bank, PNC Bank, N.A., and American Express National Bank, as discussed above in the "Description of Institution's Operations in Ohio," which accounted for almost 54 percent of the small business loan originations in the Columbus MSA AA.

Non-MSA AA

During the evaluation period, United Midwest originated eight small loans to businesses, which is insufficient for a meaningful analysis.

Consumer Loans

Refer to Table V in the State of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The OCC compared the percentage distribution of the number of consumer loans originated by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in the AA.

United Midwest's overall distribution of consumer loans reflects poor distribution. As discussed above, the OCC noted that most consumer loans are obtained through third-party sources who have relationships with the product or service provider. Consequently, the bank's ability to effectively target a market is more limited than for a traditional bank. The bank's business model and the nature of the products limiting demand among LMI consumers was considered; however, these were not sufficient to describe the distribution as adequate.

Columbus MSA AA

United Midwest's distribution of consumer loans by borrower income in the Columbus MSA AA is poor. The percentage of consumer loans originated or purchased by the bank was significantly below the percentage of low-income households and was well below the percentage of moderate-income households. The OCC considered other factors in the bank's performance during the review, including that 15.4 percent of the households live below poverty. Limited income is a substantial obstacle to credit qualification and the bank's primary consumer lending products are for excess goods such as safes, pianos, band instruments, and elective health procedures. As stated above, the OCC considered the nature of the products limiting demand among LMI borrowers; however, this was not considered

sufficient to describe the distribution as adequate. Rather, those factors prevented the borrower-income distribution from being very poor.

The lending performance in the Columbus MSA AA was supplemented by the origination of four responsive CD loans, as discussed above. The loans were to an affordable housing focused non-profit organization that assists LMI individuals and families in the AA with affordable housing options.

Additionally, the OCC noted that the number of low-income families (69,474) in Franklin County is significant and far greater than any of the bank's other AAs. Management's decision to provide substantial CD loans in Franklin County is appropriate.

Non-MSA AA

United Midwest's distribution of loans by borrower income level in the Non-MSA AA reflects overall reasonable distribution. The bank's level of consumer lending to low-income borrowers is below the demographic data but exceeds demographic data for moderate-income borrowers. The OCC considered performance context factors including the nature of the products limiting demand among low-income borrowers and that 12.1 percent of the households in the Non-MSA AA live below poverty.

Responses to Complaints

The bank has not received any complaints about its CRA performance in helping to meet the AAs' credit needs during the evaluation period.

State Rating

State of Florida

CRA rating for the State of Florida²: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- Based on a full-scope review, the bank's lending test performance in the Florida AA is overall reasonable.
- Substantial performance context factors limited lending opportunities in Florida and are described below. The bank's only branch in Florida was under contract to sell as of April 26, 2019, and was sold as of September 20, 2019.
- United Midwest has not received any complaints about its CRA performance in helping to meet the AA's credit needs during the evaluation period.

Description of Institution's Operations in Florida

Florida AA

Demographic Information of the Assessment Area						
Assessment Area: Florida AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	1.2	14.0	36.0	48.8	0.0
Population by Geography	437,346	0.5	10.4	34.8	54.3	0.0
Housing Units by Geography	184,374	0.7	12.3	36.7	50.3	0.0
Owner-Occupied Units by Geography	102,912	0.1	9.1	31.4	59.3	0.0
Occupied Rental Units by Geography	49,348	1.3	15.2	45.1	38.4	0.0
Vacant Units by Geography	32,114	1.6	18.3	40.8	39.4	0.0
Businesses by Geography	69,522	0.5	8.5	34.4	56.5	0.0
Farms by Geography	1,620	0.6	13.0	31.0	55.4	0.0
Family Distribution by Income Level	101,235	15.5	15.0	18.5	50.9	0.0
Household Distribution by Income Level	152,260	18.7	15.1	17.1	49.1	0.0
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$57,304	Median Housing Value			\$180,984

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Median Household Income MSA – 36740 Orlando-Kissimmee-Sanford, FL MSA	\$60,976	Median Gross Rent	\$1,100
		Families Below Poverty Level	8.3%
		Households Below Poverty Level	10.8%
<i>Source: 2015 ACS and 2020 D&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>			

The bank's only office in Florida was in Lake Mary, a suburb of Orlando. The office was in the Orlando-Kissimmee-Sanford MSA 36740, in an upper income CT. The Florida AA included Seminole County only, which is in the central portion of Florida. There are three other counties (Lake, Orange, and Osceola) in the Orlando-Kissimmee-Sanford MSA; however, they were not included in the bank's AA. Seminole County's population was second highest of the four counties in the Orlando-Kissimmee-Sanford MSA, behind Orange County. Sanford is the county seat of Seminole County. The data in the table above is for Seminole County only. United Midwest closed the Lake Mary, Florida Branch in September 2019; it was under contract to sell as of April 2019. The Florida AA was included in this performance evaluation for 2018 and 2019 only. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude any LMI areas. There are no designated distressed or underserved CTs in the AA.

Deposit operations in Florida functioned in a traditional manner with most deposits obtained through the physical office. Loan operations in Florida did not vary substantially from the overall description of operations provided in the "Description of Institution" section above. During the evaluation period of 2018 – 2019, United Midwest did not originate any small business loans in the Florida AA, which is insufficient for a meaningful analysis. However, the bank originated 24 consumer loans, which was commensurate with the volume originated during the prior CRA evaluation period.

According to the 2015 ACS U.S. Census data, the population of the AA is 437,346, with 0.5 percent living in low-income CTs, 10.4 percent living in moderate-income CTs, 34.8 percent living in middle-income CTs, and 54.3 percent living in upper-income CTs. The AA comprises 86 CTs, of which 1.2 are low-income, 14 percent are moderate-income, 36 percent are middle-income, and 48.8 percent are upper-income CTs. The AA includes 101,235 families and 152,260 households. There were no CT classification changes during the evaluation period.

As stated above, United Midwest's primary business focus includes small business and consumer lending in the Florida AA. Home mortgage lending was not a primary business product in the Florida AA. According to the 2019 Peer Small Business Data Market Share Report, the top small business lenders in Seminole County were American Express National Bank, JPMorgan Chase Bank, N.A., and Bank of America, N.A., which accounted for almost 53 percent of the small business loan originations in the Florida AA. United Midwest was not included in the peer small business data report as the bank was not required to report CRA small business loan data.

Competition in the AA is strong due to the presence of many financial institutions, including large banks. Competitors with significant deposit market share at June 30, 2019, include Bank of America, N.A, SunTrust Bank, Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A. These four banks account for approximately 57 percent of the total deposit market share in Seminole County. As of the June 30, 2019, FDIC's Deposit Market Share Report, there were 26 financial institutions operating 110 banking offices in the Seminole County, including United Midwest. The June 30, 2019, FDIC deposit

market share data shows United Midwest's \$61.3 million in total deposits in the AA ranked 20th in overall deposit market share at 0.7 percent. Additionally, approximately 22 percent of the total deposits at June 30, 2019, were in the Florida AA.

During 2018 – 2019, the economic conditions in the Florida AA were overall stable. The “not seasonally adjusted” unemployment rate as of December 2019 was 2.8 percent in Seminole County, which was commensurate with the Florida statewide unemployment rate of 2.9 percent (U.S. Bureau of Labor Statistics).

The AA has a diverse employer base with many industries, including health care, services, financial services, and retail trade. Major employers in Seminole County include Concentrix Corporation, JPMorgan Chase Bankcard Services, Deloitte Consulting LLP, and the local school systems.

As part of the CRA performance evaluation, the OCC reviewed information provided from interviews with representatives from CD organizations. The contacts identified small business lending and affordable housing as credit needs in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

Scope of Evaluation in Florida

The OCC performed a full-scope review of the Florida AA. The data in this AA was analyzed and presented as one AA for purposes of this performance evaluation. Small business and consumer lending are the bank's primary products in the Florida AA and were evaluated under the Lending Test. Home mortgage lending is not a primary product in the Florida AA and was not analyzed as such. As discussed above, the OCC placed more weight on the Ohio AAs, with the majority of the lending and deposits in the Ohio AAs. Refer to the “Scope of the Evaluation” section for more details.

United Midwest did not originate any small loans to businesses in the Florida AA during the evaluation period of 2018 and 2019, which is insufficient for a meaningful analysis. However, the bank originated 24 consumer loans, which was commensurate with the volume originated during the prior CRA evaluation period.

LENDING TEST

The bank's performance under the Lending Test in Florida is rated Satisfactory, given that the Florida branch was under contract to sell as of April 26, 2019, and sold as of September 20, 2019.

The OCC noted that there was a need for affordable housing in Seminole County; however, the number of low-income families in Seminole County was far lower (15,679) than in Franklin County (69,474). Thus, given that the bank was actively trying to sell the Florida branch during the evaluation period, management's decision to provide five CD loans in the Ohio AAs rather than Seminole County, Florida, was reasonable. Management had limited ability to identify risk-appropriate CD lending opportunities in Seminole County.

Additionally, just one of 86 CTs in the Florida AA was low-income and only 0.5 percent of the total population resided in this one CT. To a less severe extent, there was also limited ability to lend in the 12 moderate-income CTs, which represented 14 percent of all CTs and only 10.4 percent of the AA

population. United Midwest's only office in the county was not near the LMI CTs, and the bank's primary mechanisms for loan originations did not involve physical branches.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Florida AA is adequate.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State, given the bank's non-traditional business model and that the branch was under contract to sell as of April 26, 2019.

Small Loans to Businesses

During the evaluation period, United Midwest did not originate any small loans to businesses, which is insufficient for a meaningful analysis.

Consumer Loans

Refer to Table U in the State of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The OCC compared the percentage of the number of consumer loans originated by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the percentage distribution of households in those geographies (demographic data), placing emphasis on the LMI geographies.

The geographic distribution of consumer loans in the Florida AA is overall reasonable given that the branch was under contract to sell. The percentage of consumer loans originated and purchased by the bank was below the percentage of households in low-income CTs and well below the percentage of households in moderate-income CTs. Less than 1 percent of CTs were low-income and the bank did not originate any loans in low-income CTs, which is reasonable given the limited scale of operations in the state during the evaluation period. Whether or not a piano or musical dealer is in the market area makes a difference in the number of consumer loans originated in that AA.

Competition in the AA is strong. United Midwest was ranked 20th out of 26 financial institutions in the AA by deposit market share. In discussions with management, competition in the area and the bank actively trying to sell the branch during the evaluation period contributed to the low volume of loan originations.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank and the bank's non-traditional business model.

Small Loans to Businesses

During the evaluation period, United Midwest did not originate any small loans to businesses, which is insufficient for a meaningful analysis.

Consumer Loans

Refer to Table V in the State of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The OCC compared the percentage distribution of the number of consumer loans originated by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in the AA.

United Midwest's distribution of consumer loans by borrower income level in the Florida AA reflects overall reasonable distribution, given that management was actively trying to sell the branch since the prior CRA performance evaluation in 2018 and was under contract to sell as of April 26, 2019. The bank's level of consumer lending was well below the percentage of LMI households in the AA.

As stated above, there was substantial competition in the AA as well as 10.8 percent of the households below poverty. Additionally, the number of piano or musical dealers in the market area impacts the volume of consumer loans originated.

Responses to Complaints

The bank has not received any complaints about its CRA performance in helping to meet the AA's credit needs during the evaluation period.

Conclusions for Areas Receiving Limited Scope Reviews

Because of the bank's non-traditional business model and resultant high percentage of loans outside of its AAs, the OCC also conducted a borrower-income distribution analysis in two of the bank's high-volume states, Texas and California. Based on these limited scope reviews, the bank's performance under the lending test in both Texas and California is consistent with the bank's overall satisfactory performance.

Given the significant performance context matters present regarding the bank's business model as described under the "Description of Institution" section, performance in both states represented overall adequate lending patterns to LMI borrowers and businesses with \$1 million or less in gross annual revenues. By dollar volume, a majority of the bank's loan originations and purchases during the evaluation period are business loans. In both Texas and California, the bank's small loans to businesses compared favorably with aggregate lending data of other small business loan reporters and reasonably with demographic data. Of note, the bank originated approximately 68 SBA PPP loans in Texas and 52 SBA PPP loans in California, which accounts for most of the small loans to businesses with revenue data not available in Table R in those states in appendix D.

Refer to Tables R and V below for lending activity by borrower-income level in both Texas and California.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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”.

Time Period Reviewed:	01/01/18 – 12/31/20	
Bank Products Reviewed:	Small Business Loans, Consumer Loans, and Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
States		
Ohio		
Columbus MSA AA	Full Scope	Franklin County, Ohio, in the Columbus, OH MSA 18140.
Non-MSA AA	Full Scope	Champaign, Darke, Logan, and Preble Counties in Ohio.
Florida		
Florida AA	Full Scope	Seminole County, Florida, in the Orlando-Kissimmee-Sanford, FL MSA 36740.

Appendix B: Summary of State Ratings

Ratings: United Midwest Savings Bank, National Association	
Overall Bank:	Lending Test Rating
United Midwest Savings Bank, National Association	Satisfactory
States:	
Ohio	Satisfactory
Florida	Satisfactory

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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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.

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

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 are treated 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 30th 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.
- 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. The table also presents aggregate peer data for the years the data is available. 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.

State of Ohio

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-20
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
Columbus MSA AA	55	10,018	53.9	50,276	7.7	50.9	6.9	22.6	23.6	20.0	29.3	9.1	29.8	40.3	16.4	43.3	0.0	0.0	0.1
Non-MSA AA	47	6,761	46.1	5,122	0.0	0.0	0.0	11.3	46.8	11.4	66.8	40.4	65.5	21.9	12.8	23.1	0.0	0.0	0.0
Total	102	16,779	100.0	55,398	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-20
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
Columbus MSA AA	55	10,018	53.9	50,276	24.8	10.9	7.5	17.5	38.2	19.2	19.0	25.5	20.5	38.6	25.5	37.1	0.0	0.0	15.7
Non-MSA AA	47	6,761	46.1	5,122	19.1	4.3	6.8	17.2	23.4	19.6	23.1	29.8	23.6	40.6	42.6	35.9	0.0	0.0	14.0
Total	102	16,779	100.0	55,398	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018-20	
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	
Columbus MSA AA	48	6,366	100.0	25,743	12.1	8.3	17.7	20.3	27.1	17.6	25.3	25.0	23.0	41.7	39.6	41.3	0.7	0.0	0.4	
Total	48	6,366	100.0	25,743	12.1	8.3	17.7	20.3	27.1	17.6	25.3	25.0	23.0	41.7	39.6	41.3	0.7	0.0	0.4	

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018-20	
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		
Columbus MSA AA	48	6,366	100.0	25,743	83.6	50.0	44.9	5.4	14.6	11.0	35.4		
Total	48	6,366	100.0	25,743	83.6	50.0	44.9	5.4	14.6	11.0	35.4		

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
Columbus MSA AA	201	1,277	87.0	14.2	3.0	26.4	19.9	27.6	29.9	31.6	46.8	0.3	0.5		
Non-MSA AA	30	174	13.0	0.0	0.0	15.5	0.0	65.5	86.7	19.0	13.3	0.0	0.0		
Total	231	1,451	100.0	--	--	--	--	--	--	--	--	--	--		

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers			
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
Columbus MSA AA	201	1,277	87.0	26.2	1.5	17.1	5.0	17.6	14.4	39.2	79.1	0.0	0.0		
Non-MSA AA	30	174	13.0	20.7	16.7	16.5	20.0	18.8	20.0	43.9	43.3	0.0	0.0		
Total	231	1,451	100.0	--	--	--	--	--	--	--	--	--	--		

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%.

State of Florida

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2018-19	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Florida AA	24	83	100.0	0.5	0.0	11.1	4.2	35.9	29.2	52.6	66.7	0.0	0.0	
Total	24	83	100.0	0.5	0.0	11.1	4.2	35.9	29.2	52.6	66.7	0.0	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Bank Data.
Due to rounding, totals may not equal 100.0%.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2018-19	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Florida AA	24	83	100.0	18.7	0.0	15.1	4.2	17.1	16.7	49.1	79.2	0.0	0.0	
Total	24	83	100.0	18.7	0.0	15.1	4.2	17.1	16.7	49.1	79.2	0.0	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Bank Data.
Due to rounding, totals may not equal 100.0%.

State of Texas

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20	
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	
Texas	326	40,578	100.0	719,240	87.1	78.5	37.3	4.0	0.6	8.9	20.9	
Total	326	40,578	100.0	719,240	87.1	78.5	37.3	4.0	0.6	8.9	20.9	

Source: 2020 D&B Data; 01/01/2018 – 12/31/2020 Bank Data; 2020 CRA Aggregate Data.
 Due to rounding, totals may not equal 100.0%.
 Lending in the State of Texas was evaluated as one AA.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Texas	3,101	15,690	100.0	24.5	2.6	16.1	5.3	17.3	10.5	42.2	81.5	0.0	0.0	
Total	3,101	15,690	100.0	24.5	2.6	16.1	5.3	17.3	10.5	42.2	81.5	0.0	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.
 Due to rounding, totals may not equal 100.0%.
 Lending in the State of Texas was evaluated as one AA.

State of California

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20	
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	
California	179	24,704	100.0	1,240,681	88.2	67.6	40.7	4.5	2.8	7.3	29.6	
Total	179	24,704	100.0	1,240,681	88.2	67.6	40.7	4.5	2.8	7.3	29.6	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data.
 Due to rounding, totals may not equal 100.0%.
 Lending in the State of California was evaluated as one AA.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
California	4,318	19,463	100.0	25.3	3.8	15.6	8.4	16.7	15.3	42.5	72.6	0.0	0.0	
Total	4,318	19,463	100.0	25.3	3.8	15.6	8.4	16.7	15.3	42.5	72.6	0.0	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.
 Due to rounding, totals may not equal 100.0%.
 Lending in the State of California was evaluated as one AA.