



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

January 8, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

United Fidelity Bank, F.S.B.
Charter Number 703676

18 NW 4th St
Evansville, Indiana 47708

Office of the Comptroller of the Currency

10200 Forest Green Blvd, Suite 501
Louisville, Kentucky 40223

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: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- United Fidelity Bank (UFB or bank) originated a majority of loans to borrowers located within its assessment areas (AA).
- The Lending Test rating is outstanding based on the combined ratings of Indiana, U.S. Virgin Islands (USVI), Florida, Illinois, Colorado, and California, listed in order of weight, for the geographic and borrower distribution of loans.
- The Community Development (CD) Test rating is based on the combined ratings of Indiana, USVI, Florida, Illinois, Colorado, and California, listed in order of weight. The bank demonstrated excellent responsiveness to the needs of its AAs in the states of Indiana, Illinois, Colorado, and the USVI. The bank demonstrated a reasonable responsiveness to the needs of its AA in California.
- UFB's loan-to-deposit (LTD) ratio was reasonable.
- The bank did not receive any CRA-related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable. UFB's quarterly LTD ratio averaged 43.5 percent over the 12 quarters from December 31, 2019, to December 31, 2022. The bank's quarterly LTD ratio ranged from a high of 74.8 percent as of December 31, 2022, to a low of 24.7 percent as of March 31, 2020. The average LTD ratio is reasonable compared to similarly situated banks with averages ranging from a low of 40.4 percent to a high of 129.8 percent.

UFB's average LTD of 43.5 percent is lower than other banks within their AA, which averaged 60 percent. This is considered reasonable given the volume of transactions with one of the bank's wholly owned subsidiaries, Village Capital Corporation (VCC), and with various affiliates, which are consolidated on the call report, netting out the following loan and deposits. Throughout the review period, loans to VCC averaged \$185.7 million, while VCC deposits averaged \$11.4 million. The OCC also considered the volume of VCC unused lines of credit, which averaged \$293.2 million over the review period, and loans sold, which averaged \$2.3 million per quarter. The large volume of affiliate funds on deposit throughout the review period was also taken into consideration, which averaged \$129.2 million per quarter. These considerations increased the bank's LTD ratio to 68.8 percent.

The OCC also considered the bank's overall business strategy when assessing the reasonableness of the LTD ratio. The bank's business strategy includes supporting the development and financing of multifamily affordable housing projects through loans, which are then converted to

mortgage-backed securities through Government National Mortgage Association (GNMA). With this conversion from a loan to an investment, the loans are excluded from the LTD ratio, decreasing the reported ratio. The housing projects are generally occupied by low-and moderate-income (LMI) families and are constructed primarily in suburban areas across the United States. The bank's investment balance for these projects had a book value of \$258.7 million as of December 31, 2022.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs. The bank originated and purchased 71.3 percent of its total loans inside its AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

The following table illustrates the number and dollar volume of loans originated and purchased inside and outside the bank's AAs during the evaluation period.

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	804	79.4	209	20.6	1013	968,233	24.9	2,924,308	75.1	3,882,540
Small Business	427	60.1	284	39.9	711	68,712	51.4	64,996	48.6	133,708
Total	1230	71.3	494	28.7	1724	1,036,595	25.7	2,989,354	74.3	4,025,949

Source: HMDA data January 1, 2020 – December 31, 2022, all small business loans from bank records that were originated during the same period, and all home mortgage loans originated in USVI not reported on HMDA LAR. Due to rounding, totals may not equal 100.0 percent.

Description of the Institution

UFB is a full-service, multi-state, federally chartered savings association established in 1914 and headquartered in Evansville, IN. UFB is a wholly owned subsidiary of Fidelity Federal Bancorp, also headquartered in Evansville, IN. As of December 31, 2022, UFB had \$5.7 billion in total assets with \$3.5 billion in loans, \$4.7 billion in deposits, and \$424.5 million in tier 1 capital.

As of the December 31, 2022, call report, UFB's net loans represented approximately 65.9 percent of its average assets. The composition of loans included loans secured by multi-family (5 or more) residential properties (87.8 percent), loans secured by one- to four-family residential real estate (5.3 percent), loans secured by commercial real estate (4.6 percent), other commercial and industrial loans (0.8 percent), construction and land development (0.8 percent) loans, municipal and other loans (0.3 percent), agricultural related loans (0.3 percent), and loans to individuals (0.1 percent).

UFB employs a niche business strategy that heavily focuses on multi-family affordable housing. UFB, on its own and through its wholly owned service corporation subsidiaries develops, owns, finances, and invests in affordable housing projects throughout the country. UFB focuses on

affordable housing where at least 51 percent of the units in the complex are leased to LMI tenants.

In addition to the bank's focus on affordable housing projects, UFB also offers traditional lending products. The bank's primary lending products are residential real estate loans and business loans. UFB's New Hope Mortgage program encourages lending in LMI areas to LMI borrowers. The program is offered in all the bank's AAs. The program started in 2014 and funded 72 loans totaling \$13.7 million during the evaluation period.

As of December 31, 2022, the bank had 23 branches with 28 automated teller machines (ATMs), 22 of which were deposit taking, located across five states and one U.S. territory comprised of 10 AAs. Most branches outside of Indiana were obtained through acquisitions. Since 2014, UFB has acquired and integrated seven institutions, including five FDIC-assisted transactions. During the evaluation period, UFB made three acquisitions that added a second AA and two new branches in Florida, and a new AA, state, and one new branch in California. UFB also acquired three new branches in September 2022 adding to their existing Illinois Non-MSA AA; however, these locations are not included in this evaluation as the bank did not have presence in these additional areas for at least half of the year.

There were no legal or financial circumstances that impacted UFB's ability to meet the credit needs of its various communities. However, the COVID-19 pandemic, beginning in 2020, impacted the economy, including unemployment. The U.S. Small Business Administration's (SBA) Paycheck Protection Program (PPP) provided loans to help businesses keep their workforce employed during the pandemic. UFB participated in this program and originated 848 loans, or almost \$67.8 million. The last CRA evaluation was performed on November 13, 2020; UFB received a Satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated UFB's performance using the OCC's Intermediate Small Bank (ISB) procedures, which include a Lending Test and CD Test. The Lending Test evaluates the bank's record in meeting the credit needs of its AAs through lending activities from January 1, 2020, through December 31, 2022. The CD Test evaluated the bank's CD lending, qualified investments, and CD service activities for the same period.

Examiners used call report data and bank's internal reporting as of December 31, 2022, to determine UFB's quarterly LTD ratio. The Lending Test includes an analysis of the primary loan products for each AA. The primary loan products are detailed in the *Scope of the Evaluation* for each state, with each AA either identifying home mortgage loans, business loans, or both as the primary products for analysis. The OCC analyzed all Home Mortgage Disclosure Act (HMDA) reportable loans, small loans to businesses, and loans in the USVI. In general, banks are not required to report loans originated and purchased in the USVI; therefore, the OCC analyzed home mortgage loans from internally generated bank reports. To perform a meaningful analysis for lending performance, a minimum of 20 loans was needed in a loan product and in each analysis

period. Examiners also reviewed all CD loans, qualified investments, donations, and CD services submitted to evaluate the bank's responsiveness to the AA's credit needs. The bank's CD lending and investments were compared to the tier 1 capital amount allocated to the AA based on the area's pro rata share of bank deposits.

For analysis purposes, examiners compared the bank's lending performance with demographic data from the 2015 U.S. Census Bureau's American Community Survey (ACS) for the 2020-2021 loan originations and purchases and the 2020 U.S. Census for the 2022 loan originations and purchases. Some census tract (CT) designations changed between the two data sources in 2022 compared with 2020-2021; therefore, two different analyses were performed. The *Scope of Review* section for each state specifies the weighting of loan products, review periods, and aspects of the lending test, or any combination thereof.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank-delineated AAs located within the same metropolitan statistical area (MSA) or combined statistical area (CSA) 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. Please refer to the *Scope* section under each State Rating for details regarding how full-scope AAs were selected. Please refer to Appendix A, *Scope of Examination*, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. UFB operates in five states and one U.S. territory. UFB's performance in the state of Indiana received the most weight in our analysis. As of December 31, 2022, the bank had nine branches in Indiana, which accounted for 45 percent of all its branches and 72.5 percent of total deposits. The USVI accounted for 10 percent of branches and 12.2 percent of deposits. The state of Florida accounted for 15 percent of branches and 9 percent of deposits. The state of Illinois accounted for 15 percent of branches and 2 percent of deposits. The state of Colorado accounted for 10 percent of branches and 1 percent of deposits. The state of California accounted for 5 percent of branches and 3.4 percent of deposits.

The state ratings are based on performance in all bank AAs. Please refer to the *Scope* section under each state section for details regarding how the areas were weighted in arriving at the respective ratings.

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 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 UFB (or any affiliate whose loans have been considered as part of the bank's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that UFB engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the bank'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 California

CRA rating for the State of California: Satisfactory

The Lending Test is rated: Not Meaningful

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- UFB's CD performance demonstrates adequate responsiveness to the CD needs of its AA through CD loans, qualified investments and donations, and CD services.
- The bank did not originate enough loans in 2022 to perform a meaningful analysis for the lending test.
- The bank did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in California

Los Angeles-Long Beach-Anaheim, CA MSA

The Los Angeles MSA encompasses all of Los Angeles and Orange Counties. This AA was added in November 2021 after UFB merged with sister bank International City Bank (ICB). In 2021, the AA consisted of 2,953 CTs with 174 low-income CTs, 815 moderate-income CTs, 883 middle-income CTs, and 1,007 upper-income CTs. There were also 74 CTs in the AA that were not assigned an income classification as of 2022.

UFB has one branch and one deposit-taking ATM located in an upper-income CT in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. The total population of the AA was 12.5 million, and the largest city in the AA is Los Angeles, CA.

UFB has strong competition within the AA. As of June 30, 2022, there were 109 financial institutions operating 2,144 banking offices within the AA, including UFB. Competition in the AA included local community banks as well as branches of large national and regional banks. The June 30, 2022 FDIC Deposit Market Share Report shows UFB ranked 91st in market share at less than 0.1 percent. UFB's major competitors in the AA were Bank of America, National Association (17.3 percent market share) and JP Morgan Chase Bank, National Association (16.5 percent market share).

On average, the unemployment rates for the Los Angeles MSA were at or below the state unemployment rates for 2020 and 2022 and at or above the state unemployment rates for 2021.

Economic conditions of the AA prior to the COVID-19 pandemic were slightly better than the state of California. The Los Angeles MSA unemployment rate was 4.1 percent compared with the state of California's 4.2 percent unemployment rate going into the pandemic. At the peak of the pandemic in April 2020, the unemployment rate in the AA reached a high of 18.5 percent.

The state of California peaked at 16.1 percent in April of 2020. The 2021 and 2022 unemployment rates improved significantly for both the AA and the state.

Unemployment Rates			
	2020	2021	2022
California	9.1	5.5	4.1
Los Angeles MSA	10.1	5.1	4.2

According to the 2020 ACS data, 44.9 percent of housing in the AA was owner-occupied, 48.9 percent was renter-occupied, and 6.2 percent was vacant. In low-income CTs in the AA, 12.8 percent of housing was owner-occupied, 81.6 percent was renter-occupied, and 5.6 percent was vacant. In moderate-income CTs, 30 percent of housing was owner-occupied, 65 percent was renter-occupied, and 5 percent was vacant. The median gross rent was \$1,680; the median housing value was \$710,658; and 9.6 percent of families in the AA live below the federal poverty level.

According to the August 2023 Moody’s Analytics report, the AA strengths are a strong healthcare base; a growing tech presence; global links through entertainment, tourism, and fashion; and a deep San Pedro Harbor enabling megaships that other ports cannot handle. The leading industries by wage tier include the motion picture and video industries, medical and surgical hospitals, offices of physicians, and management of companies and enterprises. Major employers include Cedars-Sinai Medical Center, Los Angeles Intl Airport, University of California Los Angeles, and VXI Global Solutions.

A community contact with an organization whose purpose is to promote economic development and stability in the AA was reviewed. A primary need in the area is financial education and grants to support small businesses maintaining operations in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Los Angeles MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,953	5.9	27.6	29.9	34.1	2.5
Population by Geography	12,490,427	5.4	28.3	31.2	34.0	1.1
Housing Units by Geography	4,447,414	4.9	25.3	30.0	38.5	1.3
Owner-Occupied Units by Geography	1,998,522	1.4	16.9	31.8	49.5	0.4
Occupied Rental Units by Geography	2,172,976	8.2	33.7	28.9	27.2	2.0
Vacant Units by Geography	275,916	4.4	20.7	25.3	47.1	2.5
Businesses by Geography	1,735,955	3.4	18.7	27.4	47.9	2.7
Farms by Geography	15,964	2.5	17.8	29.4	48.7	1.6
Family Distribution by Income Level	2,800,464	23.8	16.5	17.9	41.8	0.0
Household Distribution by Income Level	4,171,498	25.7	15.2	16.7	42.3	0.0

Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA	\$106,451	Median Housing Value	\$710,658
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA	\$80,317	Median Gross Rent	\$1,680
		Families Below Poverty Level	9.6%
<i>Source: 2020 ACS, 2022 D&B Data, and FFIEC Estimated Median Family Income. (*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Scope of Evaluation in California

The bank has only one AA in the state of California, the Los Angeles MSA. This AA received a full-scope review. The table below shows the bank's lending in the AA during the review period.

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Home Mortgage Loans	2	10.0	16.7
Business Loans	18	90.0	83.3
Farm Loans	0	0.0	0.0
Consumer Loans	0	0.0	0.0
Total Loans	20	100.0	100.0

Source: HMDA data and internal bank loan originations report for 2022.

The bank added this state and AA to its evaluation in November 2021; therefore, only one year of data was assessed and resulted in a low volume of loans. For a meaningful analysis to be performed, there must be at least 20 loans in any one loan category. Based on the above chart, the bank did not originate at least 20 loans in any one category. Therefore, the Lending Test was not performed and does not have a rating. The state of California rating will carry minimal weighting in the final overall rating based on branch presence and overall deposit volume in the AA.

Conclusions with Respect to Performance Tests in California

LENDING TEST

Based on the volume of loans originated in the state of California and in the AA, the OCC could not perform a meaningful analysis for the Lending Test.

Responses to Complaints

UFB did not receive any written complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of California is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Los Angeles MSA	2	50.0	1,521	98.1
Statewide	2	50.0	29	1.9
Total	4	100.0	1,550	100.0

The level of CD loans represents an adequate level of responsiveness to the CD needs in the AA. The bank originated two CD loans totaling \$1.5 million, representing 9.1 percent of allocated tier 1 capital. The bank supported affordable housing needs (one loan totaling \$1.5 million) and revitalizations and stabilizations needs (one loan totaling \$21,000) in the AA. Additionally, the bank made two loans totaling \$29,000 in the broader statewide area supporting revitalization and stabilization without a purpose, mandate, or function (P/M/F) to the bank's AA.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Los Angeles MSA	0	0	7	14	7	100	14	100	0	0

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

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

The bank did not make any CD investments in the AA during the evaluation period. UFB donated \$14,325 to various community organizations with the purpose of supporting affordable housing, community services, and revitalization and stabilization in the AA.

Extent to Which the Bank Provides Community Development Services

The bank provided limited responsiveness in providing CD services. During the evaluation period, UFB provided two qualified CD services to two organization in the Los Angeles MSA. One bank employee provided 33 hours of community services targeting LMI individuals. This employee served as community president for two community service organizations.

State of Colorado

CRA rating for the State of Colorado: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits excellent distribution of home mortgage loans to individuals of different income levels.
- The geographic distribution of loans throughout the AA is excellent.
- UFB's CD performance demonstrates adequate responsiveness to the CD needs of its AA through CD loans, qualified investments and donations, and CD services.
- The bank did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in Colorado

Denver-Aurora-Lakewood, CO MSA

The Denver-Aurora-Lakewood, CO MSA (Denver MSA) encompasses all of Arapahoe, Denver, and Jefferson Counties. In 2020 and 2021, the AA consisted of 429 CTs with 39 low-income CTs, 105 moderate-income CTs, 146 middle-income CTs, and 135 upper-income CTs. There were also four CTs in the AA in 2020 and 2021 that were not assigned an income classification. In 2022, the CTs in the AA changed due to new 2020 U.S. Census data and added 56 additional CTs for a total of 485. As of 2022 there are 25 low-income CTs, 122 moderate-income CTs, 185 middle-income CTs, and 138 upper income CTs. There were also 15 CTs in the AA that were not assigned an income classification.

UFB has two branches and one deposit-taking ATM, both of which are in moderate-income CTs, in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. The total population of the AA was 2 million, and the largest city in the AA is Denver, CO.

UFB has strong competition within the AA. As of June 30, 2022, there were 60 financial institutions operating 430 banking offices within the AA, including UFB. Competition in the AA included local community banks as well as branches of large national and regional banks. The June 30, 2022 FDIC Deposit Market Share Report shows UFB ranked 48th in market share at less than 0.1 percent. UFB's major competitors in the AA were Wells Fargo Bank, National Association (21.9 percent market share) and JPMorgan Chase Bank, National Association (14.7 percent market share).

On average, the unemployment rates for the Denver MSA were at or below the state unemployment rates for 2021 and 2022 and at or slightly above the state unemployment rates for 2020.

Economic conditions of the AA prior to the COVID-19 pandemic were slightly better than the state of Colorado. The Denver MSA unemployment rate was 2.5 percent compared with the state of Colorado’s 2.8 percent unemployment rate going into the pandemic. At the peak of the pandemic in May 2020, the unemployment rate in the AA reached a high of 12.2 percent. The state of Colorado peaked at 11.6 percent in May of 2020. The 2021 and 2022 unemployment rates improved significantly for both the AA and the state.

Unemployment Rates			
	2020	2021	2022
Colorado	6.4	4.2	2.8
Denver-Aurora-Lakewood MSA	6.5	3.9	2.5

The median housing value in the AA was \$532,249 and \$600,000 in 2020 and 2022, respectively, reflecting a change of 12.7 percent according to Realtor.com data. Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, home-owners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$58,900 per year (or less than 50 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$274,300 mortgage with a payment of \$1,473 per month. A moderate-income borrower making \$94,240 per year (or less than 80 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$438,879 mortgage with a payment of \$2,356 per month. LMI borrowers would be challenged to qualify for a mortgage loan in the AA at the median housing value with an estimated payment of \$3,221.

According to the 2020 ACS Census data, 58.3 percent of housing in the AA was owner-occupied, 36.9 percent was renter-occupied, and 4.8 percent was vacant. In low-income CTs in the AA, 31.8 percent of housing was owner-occupied, 62.7 percent was renter-occupied, and 5.5 percent was vacant. In moderate-income CTs, 45.2 percent of housing was owner-occupied, 49.5 percent was renter-occupied, and 5.3 percent was vacant. The median gross rent was \$1,436; the median housing value was \$437,134; and 5.7 percent of families in the AA live below the federal poverty level.

According to the August 2023 Moody’s Analytics report, the AA strengths are high concentration of dynamic, knowledge-based industries; strong in-migration and population growth; skilled workforce; and high employment diversity. The leading industries by wage tier include computer systems design and related services; management of companies and enterprises; architectural, engineering, and related services; and Federal Government. Major employers include HealthONE, UCHealth: University of Colorado Hospital, Lockheed Martin Corporation, United Airlines, and Children’s Hospital Colorado.

Two community contacts with organizations whose purpose is to promote economic development and stability in the AA were reviewed. General needs in the AA include improved transportation and the continuous demand for affordable housing, especially for individuals in the low-income category. Also, financial education for LMI individuals and enhanced technical assistance for small businesses was identified.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	429	9.1	24.5	34.0	31.5	0.9
Population by Geography	1,810,308	9.9	24.4	34.8	30.7	0.1
Housing Units by Geography	768,099	9.4	24.1	35.9	30.6	0.0
Owner-Occupied Units by Geography	434,682	5.4	18.9	36.7	39.0	0.0
Occupied Rental Units by Geography	293,606	14.8	31.6	35.1	18.4	0.0
Vacant Units by Geography	39,811	12.4	25.2	33.9	28.4	0.0
Businesses by Geography	368,727	7.1	19.4	33.1	40.0	0.4
Farms by Geography	5,836	9.1	21.5	32.9	35.9	0.5
Family Distribution by Income Level	430,029	22.9	17.9	19.9	39.3	0.0
Household Distribution by Income Level	728,288	25.4	17.1	18.1	39.4	0.0
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Housing Value			\$284,622
			Median Gross Rent			\$1,043
			Families Below Poverty Level			8.7%
<i>Source: 2015 ACS, 2021 D&B Data, and FFIEC Estimated Median Family Income.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	485	5.2	25.2	38.1	28.5	3.1
Population by Geography	1,953,502	4.6	27.5	37.5	28.9	1.4
Housing Units by Geography	796,893	4.7	27.2	38.2	28.2	1.7
Owner-Occupied Units by Geography	464,644	2.6	21.1	41.6	34.0	0.7
Occupied Rental Units by Geography	294,008	8.1	36.5	33.6	18.9	3.0
Vacant Units by Geography	38,241	5.4	30.1	32.0	29.7	2.8
Businesses by Geography	467,208	3.6	20.3	34.4	37.1	4.7
Farms by Geography	6,832	4.2	23.4	37.6	32.0	2.8
Family Distribution by Income Level	443,638	21.2	18.5	21.6	38.7	0.0

Household Distribution by Income Level	758,652	24.0	17.6	18.7	39.6	0.0
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$103,157	Median Housing Value			\$437,134
			Median Gross Rent			\$1,436
			Families Below Poverty Level			5.7%
<i>Source: 2020 ACS, 2022 D&B Data, and FFIEC Estimated Median Family Income. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Colorado

The bank has only one AA in the state of Colorado, the Denver MSA. This AA received a full-scope review. The table below shows the bank's lending in the AA during the review period.

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Home Mortgage Loans	184	84.4	96.8
Business Loans	32	14.7	3.2
Farm Loans	0	0.0	0.0
Consumer Loans	2	0.9	0.0
Total Loans	218	100.0	100.0

Source: HMDA LAR and internal bank loan originations for 2020-2022

Home mortgage loans are the bank's primary lending product in the AA. The bank originated and purchased 84.4 percent of residential real estate loans by number and 96.8 percent by dollar volume in the AA during the evaluation period. The analyses for both 2020-2021 and 2022 carried equal weight in the Lending Test rating. The OCC used the bank's HMDA reportable loans for analysis.

Conclusions With Respect to Performance Tests in Colorado

LENDING TEST

The bank's performance under the Lending Test in Colorado is rated Outstanding.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state.

Home Mortgage Loans

Please refer to Table O in the *State of Colorado* 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.

2020-2021

The geographic distribution of the bank's home mortgage lending is excellent. The bank's lending in low-income CTs exceeded both the demographic comparator and the aggregate lending in the geography. The bank's lending in moderate-income CTs exceeded both the demographic comparator and the aggregate lending in the geography.

2022

The geographic distribution of the bank's home mortgage lending is excellent. The bank's lending in low-income CTs exceeded both the demographic comparator and the aggregate lending in the geography. The bank's lending in moderate-income CTs exceeded both the demographic comparator and the aggregate lending in the geography.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels.

Home Mortgage Loans

Please refer to Table P in the *State of Colorado* 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.

2020-2021

The borrower distribution of home mortgage lending is excellent. The bank's lending to low-income borrowers was consistent with the demographic comparator but exceeded the aggregate comparator. The bank's lending to moderate-income borrower exceeded both the demographic comparator and the aggregate comparator.

2022

The borrower distribution of home mortgage lending is excellent. The bank's lending to low-income borrowers exceeded both the demographic comparator and the aggregate comparator. The bank's lending to moderate-income borrowers exceeded both the demographic comparator and the aggregate comparator.

Responses to Complaints

UFB did not receive any written complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Colorado is rated Satisfactory.

Conclusions for area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Denver MSA	46	79.3	45,060	37.8
Statewide	12	20.7	74,178	62.2
Total	58	100.0	119,238	100.0

Denver MSA

The bank originated 46 CD loans totaling \$45 million representing 947.6 percent of allocated tier 1 capital. The bank supported affordable housing needs (two loans totaling \$41.5 million) and revitalizations and stabilizations needs (44 loans totaling \$3.5 million) in the AA. All 44 loans for revitalization and stabilizations were PPP loans made to businesses to support their workforce through the Covid-19 pandemic.

Statewide

The bank made 12 loans totaling \$74.2 million in the broader statewide area without P/M/F supporting revitalization and stabilization. The loans supported affordable housing (seven loans totaling \$73.7 million) and revitalization and stabilization needs (five loans totaling \$444 thousand). All five loans for revitalization and stabilizations were PPP loans made to businesses to support their workforce through the Covid-19 pandemic.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Denver MSA	0	0	4	9	4	44.4	9	0.1	0	0
Statewide	2	49,675	3	107,664	5	55.6	157,339	99.9	0	0
Total	2	49,675	7	107,673	9	100.0	157,348	100.0	0	0

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

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

Denver MSA

The bank did not make any CD investments during the evaluation period or from prior period activities. The bank made four current period donations and grants totaling \$9,000. These donations were to support community services to LMI individuals in the AA and affordable housing.

Statewide

The bank made three statewide investments totaling \$107.7 million supporting affordable housing without a P/M/F to benefit the bank's AAs. Additionally, the bank had two prior period statewide investments outstanding totaling \$49.7 million supporting affordable housing without a P/M/F to benefit the bank's AAs.

Extent to Which the Bank Provides Community Development Services

The bank did not provide any qualifying CD services in the Denver MSA during the evaluation period.

State of Florida

CRA rating for the State of Florida: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic dispersion of business loans in the Crestview MSA was excellent.
- The distribution of loans to small businesses was excellent in the Crestview MSA.
- The geographic dispersion and distribution of home mortgage loans in the Cape Coral MSA was excellent.
- UFB's CD performance demonstrates excellent responsiveness to the CD needs of its AA through CD loans, qualified investments and donations, and CD services.
- The bank did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in Florida

Cape Coral-Ft. Myers, FL MSA

The Cape Coral-Ft. Myers, FL MSA (Cape Coral MSA) encompasses all of Lee County, FL. In 2020 and 2021, the AA consisted of 167 CTs with seven low-income CTs, 42 moderate-income CTs, 60 middle-income CTs, and 56 upper-income CTs. There were also two CTs in the AA in 2020 and 2021 that were not assigned an income classification. In 2022, the CTs in the AA changed due to new 2020 U.S. Census data and added 56 additional CTs for a total of 223. As of 2022 there are five low-income CTs, 48 moderate-income CTs, 99 middle-income CTs, and 66 upper income CTs. There were also five CTs in the AA that were not assigned an income classification as of 2022.

UFB has one branch and one deposit-taking ATM located in a middle-income CT in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. The total population of the AA was 760,802, and the largest city in the AA is Cape Coral, FL.

UFB has strong competition within the AA. As of June 30, 2022, there were 32 financial institutions operating 165 banking offices within the AA, including UFB. Competition in the AA included local community banks as well as branches of large national and regional banks. The June 30, 2022, FDIC Deposit Market Share Report shows UFB ranked 27th in market share at less than 0.3 percent. UFB's major competitors in the AA were Bank of America, National Association (15.6 percent market share) and Wells Fargo Bank, National Association (15.6 percent market share).

On average, the unemployment rates for the Cape Coral MSA were at or below the state unemployment rates for 2020 and 2021 and at or above the state unemployment rates for 2022. The Cape Coral MSA unemployment rate was 2.7 percent compared with the state of Florida's 2.7 percent unemployment rate going into the pandemic. At the peak of the pandemic in April 2020, the unemployment rate in the AA reached a high of 13.7 percent. The state of Florida

peaked at 14.2 percent in May of 2020. The 2021 unemployment rates improved significantly for both the AA and the state.

Unemployment Rates			
	2020	2021	2022
Florida	7.7	4.6	2.9
Cape Coral MSA	7.3	4.2	3.1

According to the 2020 ACS Census data, 52.3 percent of housing in the AA was owner-occupied, 19.7 percent was renter-occupied, and 28.8 percent was vacant. In low-income CTs in the AA, 29.8 percent of housing was owner-occupied, 52.7 percent was renter-occupied, and 17.5 percent was vacant. In moderate-income CTs, 44.1 percent of housing was owner-occupied, 35.4 percent was renter-occupied, and 20.5 percent was vacant. The median gross rent was \$1,253; the median housing value was \$264,556; and 7.9 percent of families in the AA live below the federal poverty level.

The median housing value in the AA is \$319,950 and \$465,000 in 2020 and 2022, respectively, reflecting a change of 45.3 percent according to Realtor.com data. Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$41,600 per year (or less than 50 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$193,733 mortgage with a payment of \$1,040 per month. A moderate-income borrower making \$66,560 per year (or less than 80 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$309,973 mortgage with a payment of \$1,664 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA at the median housing value with an estimated payment of \$2,496.

According to the August 2023 Moody’s Analytics report, the AA strengths are a very high economic vitality, favorable migration trends, large retiree population and tourism support, and consumer industries. The leading industries by wage tier include offices of physicians, management, scientific and technical consulting services, management of companies and enterprises, and the Federal Government. Major employers include Lee Memorial Health System, Publix Super Markets Inc., Florida Gulf Coast University, and Walmart Inc.

A community contact with an organization whose purpose is to promote economic development and stability in the AA was reviewed. A primary need in the area are small business loans primarily in the range of \$25,000 to \$100,000 for start-ups and young businesses. The contact also noted there is a continuous demand for affordable housing.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cape Coral 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	167	4.2	25.1	35.9	33.5	1.2
Population by Geography	663,675	4.7	27.1	42.3	25.9	0.0
Housing Units by Geography	374,333	3.5	21.3	40.9	34.4	0.0
Owner-Occupied Units by Geography	174,162	2.1	18.6	44.2	35.1	0.0
Occupied Rental Units by Geography	78,125	8.5	32.9	38.0	20.5	0.0
Vacant Units by Geography	122,046	2.3	17.6	38.0	42.1	0.0
Businesses by Geography	132,866	2.9	22.8	41.0	33.1	0.1
Farms by Geography	3,904	3.2	26.6	46.4	23.8	0.0
Family Distribution by Income Level	165,635	20.7	18.5	19.7	41.1	0.0
Household Distribution by Income Level	252,287	22.6	17.2	18.8	41.4	0.0
Median Family Income MSA - 15980 Cape Coral-Fort Myers, FL MSA		\$57,627	Median Housing Value			\$192,233
			Median Gross Rent			\$970
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS, 2021 D&B Data, and FFIEC Estimated Median Family Income.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cape Coral 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	223	2.2	21.5	44.4	29.6	2.2
Population by Geography	760,822	2.3	23.7	46.7	26.4	0.8
Housing Units by Geography	401,252	1.7	20.3	44.9	32.2	0.9
Owner-Occupied Units by Geography	209,905	1.0	17.1	49.6	32.1	0.2
Occupied Rental Units by Geography	79,011	4.7	36.5	40.3	18.1	0.4
Vacant Units by Geography	112,336	1.1	14.9	39.4	42.3	2.4
Businesses by Geography	154,094	2.1	21.9	46.1	29.2	0.6
Farms by Geography	4,341	1.9	22.2	49.4	26.3	0.2
Family Distribution by Income Level	187,877	19.3	19.0	20.8	40.9	0.0

Household Distribution by Income Level	288,916	22.3	17.0	19.2	41.4	0.0
Median Family Income MSA - 15980 Cape Coral-Fort Myers, FL MSA		\$71,043	Median Housing Value			\$264,556
			Median Gross Rent			\$1,253
			Families Below Poverty Level			7.9%
<i>Source: 2020 ACS, 2022 D&B Data, and FFIEC Estimated Median Family Income. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Crestview-Ft. Walton Beach-Destin, FL MSA

UFB acquired First City Bank of Florida in October of 2020, adding the Crestview MSA as a new AA in Florida beginning in 2021. This acquisition added two new branch and two new deposit-taking ATMs to the bank's footprint.

The Crestview-Ft. Walton Beach-Destin, FL MSA (Crestview MSA) encompasses all of Okaloosa County. In 2021, the AA consisted of 43 CTs with zero low-income CTs, four moderate-income CTs, 27 middle-income CTs, and 10 upper-income CTs. There were also two CTs in the AA in 2021 that were not assigned an income classification. In 2022, the CTs in the AA changed due to new 2020 U.S. Census data and added six additional CTs for a total of 49. As of 2022 there are three low-income CTs, nine moderate-income CTs, 21 middle-income CTs, and 14 upper income CTs. There were also two CTs in the AA that were not assigned an income classification as of 2022.

UFB has two branches and two deposit-taking ATMs, one branch and one ATM each located in a low-income and a moderate-income CT in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. The total population of the AA was 211,668, and the largest city in the AA is Crestview, FL.

UFB has strong competition within the AA. As of June 30, 2022, there were 22 financial institutions operating 58 banking offices within the AA, including UFB. Competition in the AA included local community banks as well as branches of large national and regional banks. The June 30, 2022, FDIC Deposit Market Share Report shows UFB ranked seventh in market share at less than 4.1 percent. UFB's major competitors in the AA were Synovus Bank (13.5 percent market share) and Regions Bank (11.9 percent market share).

On average, the unemployment rates for the Crestview, FL MSA were below the state unemployment rates for 2020, 2021, and 2022. The Crestview MSA unemployment rate was 2.5 percent compared with the state of Florida's 2.7 percent unemployment rate going into the pandemic. At the peak of the pandemic in April 2020, the unemployment rate in the AA reached a high of 12.8 percent. The state of Florida peaked at 14.2 percent in May of 2020. The 2021 unemployment rates improved significantly for both the AA and the state.

Unemployment Rates			
	2020	2021	2022
Florida	7.7	4.6	2.9
Crestview MSA	5.5	3.3	2.4

The major industries in the AA include accommodation and food services, retail trade, and healthcare and social services. Over the evaluation period, manufacturing, utilities, real estate, rental, and leasing experienced declines in industry workforce. This, however, has not impacted the number of jobs available in the AA.

According to the 2020 ACS Census data, 53.4 percent of housing in the AA was owner-occupied, 27.6 percent was renter-occupied, and 19 percent was vacant. In low-income CTs in the AA, 27.7 percent of housing was owner-occupied, 60.9 percent was renter-occupied, and 11.4 percent was vacant. In moderate-income CTs, 50.3 percent of housing was owner-occupied, 41.5 percent was renter-occupied, and 8.2 percent was vacant. The median gross rent was \$1,188; the median housing value was \$264,814; and 6.9 percent of families in the AA live below the federal poverty level.

Two community contacts with organizations whose purpose is to promote economic development and stability and affordable housing in the AA were reviewed. A primary need in the area is the continuous demand for affordable housing, especially for individuals in the low-income category, and grants to fund homeowners insurance policies on these homes.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Crestview MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	0.0	9.3	62.8	23.3	4.7
Population by Geography	192,237	0.0	6.0	74.9	19.1	0.0
Housing Units by Geography	94,238	0.0	5.9	67.1	26.9	0.0
Owner-Occupied Units by Geography	47,561	0.0	2.4	74.8	22.8	0.0
Occupied Rental Units by Geography	27,323	0.0	12.8	72.8	14.4	0.0
Vacant Units by Geography	19,354	0.0	4.9	40.5	54.7	0.0
Businesses by Geography	34,735	0.0	6.1	65.7	28.2	0.0
Farms by Geography	904	0.0	3.3	81.2	15.5	0.0
Family Distribution by Income Level	49,610	19.1	17.2	21.6	42.2	0.0
Household Distribution by Income Level	74,884	21.3	16.6	18.4	43.7	0.0
Median Family Income MSA - 18880 Crestview-Fort Walton Beach-Destin, FL MSA		\$63,539	Median Housing Value			\$214,998
			Median Gross Rent			\$1,042

		Families Below Poverty Level	10.4%
<i>Source: 2015 ACS, 2021 D&B Data, and FFIEC Estimated Median Family Income. (*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Table A – Demographic Information of the Assessment Area						
Assessment Area: Crestview MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	49	6.1	18.4	42.9	28.6	4.1
Population by Geography	211,668	3.7	21.1	45.1	30.1	0.0
Housing Units by Geography	97,802	3.6	19.0	42.8	34.5	0.0
Owner-Occupied Units by Geography	52,273	1.9	17.9	47.4	32.8	0.0
Occupied Rental Units by Geography	26,962	8.1	28.6	38.4	24.9	0.0
Vacant Units by Geography	18,567	2.2	8.2	36.4	53.3	0.0
Businesses by Geography	39,302	5.4	17.4	42.4	34.9	0.0
Farms by Geography	1,006	4.3	17.8	53.1	24.9	0.0
Family Distribution by Income Level	51,719	19.5	18.7	21.6	40.2	0.0
Household Distribution by Income Level	79,235	22.5	17.1	18.7	41.7	0.0
Median Family Income MSA - 18880 Crestview-Fort Walton Beach-Destin, FL MSA		\$79,490	Median Housing Value			\$264,814
			Median Gross Rent			\$1,188
			Families Below Poverty Level			6.9%
<i>Source: 2020 ACS, 2022 D&B Data, and FFIEC Estimated Median Family Income. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Florida

The bank has two AAs in the state of Florida, the Cape Coral MSA and the Crestview MSA. The Crestview MSA accounted for 81.3 percent of deposits and 66 percent of loans by number within the state. The Cape Coral MSA accounted for 18.7 percent of deposits and 34 percent of loans by number. Both the Cape Coral MSA and Crestview MSA received full-scope reviews. The performance in the Crestview MSA carried more weight in our analysis based on the deposit and loan volume. The table below shows the bank’s lending in the AAs during the review period.

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Cape Coral MSA:			
Home Mortgage Loans	39	81.3	99.7
Business Loans	7	14.6	0.3
Farm Loans	0	0.0	0.0
Consumer Loans	2	4.2	0.0
Total Loans	48	100.0	100.0
Crestview MSA:			
Home Mortgage Loans	19	20.4	79.3
Business Loans	61	65.6	19.0
Farm Loans	3	3.2	0.8
Consumer Loans	10	10.8	0.9
Total Loans	93	100.0	100.0

Source: HMDA LAR and internal bank loan originations for 2020-2022

Primary products used in the geographic and borrower distribution analyses varied between the AAs. In the Cape Coral MSA, home mortgage loans were the bank's primary lending product based on both number and dollar volume. More weight was placed on the 2020-2021 analysis than the 2022 analysis as there was more lending volume in 2020-2021.

In the Crestview MSA, small loans to businesses were the bank's primary lending product based on number volume. While home mortgage loans had a higher volume by dollar than business loans, the bank originated 19 loans during the evaluation, which is not enough to perform a meaningful analysis on the product. More weight was placed on the 2022 analysis than the 2021 analysis as there was more lending volume in 2022.

As noted above, the Crestview MSA was added in 2021; therefore, there are two years of analysis in the lending data compared to three years in the Cape Coral MSA lending data.

Conclusions with Respect to Performance Tests in Florida

LENDING TEST

The bank's performance under the Lending Test in Florida is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the state of Florida is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state.

Home Mortgage Loans

Please refer to Table O in the *State of Florida* 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.

Cape Coral MSA

The geographic distribution of home mortgage loans in the Cape Coral MSA is excellent.

2020-2021

The geographic distribution of the bank's home mortgage lending was excellent. The bank did not originate any loans in low-income CTs. The demographic comparator and aggregate data were 2.1 percent and 1.4 percent, respectively, indicating minimal opportunities to penetrate low-income geographies against strong competition. The bank's lending in moderate-income CTs exceeded both the demographic comparator and the aggregate lending in the geography.

2022

The bank did not originate enough loans to perform a meaningful analysis.

Small Loans to Businesses

Please refer to Table Q in the *State of Florida* 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.

Crestview MSA

The geographic distribution of small business loans in the Crestview MSA is excellent.

2021

The overall geographic distribution of small loans to businesses in LMI CTs is reasonable. The AA does not have low-income CTs. The bank's lending in moderate-income CTs was below but within reasonable range of both the demographic comparator and the aggregate lending data.

2022

The overall geographic distribution of small loans to businesses in LMI CTs is excellent. The bank's lending exceeded both the demographic comparator and the aggregate data for low-income CTs. The bank's lending in moderate-income CTs was near to both the demographic comparator and the aggregate data.

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Please refer to Table P in the *State of Florida* 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.

Cape Coral MSA

The borrower distribution of home mortgage loans in the Cape Coral MSA is excellent.

2020-2021

The borrower distribution of home mortgage lending is excellent. The bank's lending to low-income borrowers was below the demographic comparator but exceeded the aggregate comparator. The bank's lending to moderate-income borrowers exceeded both the demographic comparator and the aggregate comparator.

2022

The bank did not originate enough loans to perform a meaningful analysis.

Small Loans to Businesses

Please refer to Table R in the *State of Florida* 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.

Crestview MSA

The distribution of loans to businesses of different sizes in the Crestview MSA is excellent.

2021

The overall distribution of loans to businesses of different sizes is excellent. The bank was below the demographic comparator but exceeded the aggregate lending for the AA at 79.3 percent of loans to businesses with less than \$1 million in gross annual revenues.

2022

The overall distribution of loans to businesses of different sizes is excellent. The bank was below the demographic comparator but exceeded the aggregate lending. UFB originated 71.9 percent of loans to businesses with less than \$1 million in gross annual revenues.

Responses to Complaints

UFB did not receive any written complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Florida is rated Outstanding.

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Cape Coral MSA	20	51.3	92,742	50.4
Crestview MSA	15	38.5	57,456	31.2
Statewide	4	10.3	33,926	18.4
Totals	39	100.0	184,124	100.0

Cape Coral MSA

The bank originated 20 CD loans totaling \$ 92.7 million representing 1,109.9 percent of allocated tier 1 capital. The bank supported affordable housing needs (17 loans totaling \$92.6 million) and revitalizations and stabilizations needs (three loans totaling \$177 thousand) in the AA.

Crestview MSA

The bank originated 15 CD loans totaling \$57.5 million representing 158.4 percent of allocated tier 1 capital. The bank supported affordable housing needs (10 loans totaling \$57.3 million) and revitalizations and stabilizations needs (five loans totaling \$113,000) in the AA.

Statewide

Additionally, the bank made four loans totaling \$33.9 million in the broader statewide area without P/M/F supporting revitalization and stabilization. The loans supported affordable

housing (three loans totaling \$33.9 million) and revitalization and stabilization needs (one loan totaling \$2,000).

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cape Coral MSA	0	0	10	24	10	90.9	24	82.8	0	0
Crestview MSA	0	0	1	5	1	9.1	5	7.2	0	0

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

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

Cape Coral MSA

The bank made 10 current period donations and grants totaling \$24,000. The primary purpose of these funds were to support economic development and community services targeting LMI families in most need.

Crestview MSA

The bank made one current period grant totaling \$5,000 to support affordable housing needs in the AA and help LMI families obtain economic stability.

Extent to Which the Bank Provides Community Development Services

Cape Coral MSA

During the evaluation period, one employee performed nine hours of CD services for one organization. This employee represented 40 percent of employees at this branch. The employee provided assistance in reviewing grants to support community services activities supporting the AA.

Crestview MSA

During the evaluation period, six employees performed 192 hours of CD services for 12 organizations. These employees represented 28.6 percent of employees at these branches. The six employees provided financial literacy courses, provided homeownership counseling, and assisted with fundraising activities. Two employees serve in multiple leadership roles, serving on the boards of seven different organizations.

State of Illinois

CRA rating for the State of Illinois: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of home mortgage loans was excellent.
- The distribution of home mortgage to LMI borrowers was excellent.
- UFB's CD performance demonstrates excellent responsiveness to the CD needs of its AA through CD loans, qualified investments and donations, and CD services.
- The bank did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in Illinois

Chicago-Naperville-Evanston, IL MSA

The Chicago-Naperville-Evanston MSA (Chicago MSA) encompasses a portion (approximately 71 percent) of Cook County in Illinois reasonably serviceable by the bank. In 2020 and 2021, the AA consisted of 952 CTs with 247 low-income CTs, 313 moderate-income CTs, 185 middle-income CTs, and 196 upper-income CTs. There were 11 CTs in the AA in 2020 and 2021 that were not assigned an income classification. In 2022, the CTs in the AA changed due to new 2020 U.S. Census data resulting in the deduction of three CTs for a total of 949. As of 2022 there are 213 low-income CTs, 283 moderate-income CTs, 223 middle-income CTs, and 215 upper income CTs. There were also 15 CTs in the AA that were not assigned an income classification as of 2022.

UFB has two branches of which all are in moderate-income CTs in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. The total population of the AA was 3.5 million, and the largest city in the AA is Chicago, IL.

UFB has strong competition within the AA. As of June 30, 2022, there were 99 financial institutions operating 1,192 banking offices within the AA, including UFB. Competition in the AA included local community banks as well as branches of large regional banks. The June 30, 2022, FDIC Deposit Market Share Report shows UFB ranked 88th in market share at less than 0.1 percent. UFB's major competitors in the AA were JP Morgan Chase Bank, National Association (23.8 percent market share) and BMO Harris Bank, National Association (16.1 percent market share).

On average, the unemployment rates for the Chicago MSA were at or below the state unemployment rates for 2021 and at or above the state unemployment rates for 2020 and 2022.

Economic conditions of the AA prior to the COVID-19 pandemic were like those of the state of Illinois. The Chicago MSA unemployment rate was 3.3 percent compared with the state of Illinois' 3.3 percent unemployment rate going into the pandemic. At the peak of the pandemic in

April 2020, the unemployment rate in the AA reached a high of 18.4 percent. The state of Illinois peaked at 17.7 percent in April of 2020. The 2021 and 2022 unemployment rates improved significantly for both the AA and the state.

Unemployment Rates			
	2020	2021	2022
Illinois	7.7	4.2	4.0
Chicago MSA	7.8	4.1	4.1

According to the August 2023 Moody's Analytics report, the AA strengths are a major center for business, distribution, transportation, and finance; huge talent pool; and a budding high-tech center in River North neighborhood. The leading industries by wage tier include management, scientific, and technical consulting services; computer systems design and related services; offices of physicians; and depository credit intermediation. Major employers include Amazon.com Inc., Advocate Health Care System, Northwestern Memorial Healthcare, University of Chicago, and Walgreens Boots Alliance Inc.

According to the 2020 ACS Census data, 44.2 percent of housing in the AA was owner-occupied, 46 percent was renter-occupied, and 10.8 percent was vacant. In low-income CTs in the AA, 27.3 percent of housing was owner-occupied, 55.5 percent was renter-occupied, and 17.2 percent was vacant. In moderate-income CTs, 45 percent of housing was owner-occupied, 44.4 percent was renter-occupied, and 10.6 percent was vacant. The median gross rent was \$1,215; the median housing value was \$277,678; and 12.7 percent of families in the AA live below the federal poverty level.

Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$52,850 per year (or less than 50 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$246,125 mortgage with a payment of \$1,321 per month. A moderate-income borrower making \$84,560 per year (or less than 80 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$393,799 mortgage with a payment of \$2,114 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,742. The median housing value in the AA is \$299,900 and \$324,500 in 2020 and 2022, respectively, reflecting a change of 8.2 percent according to Realtor.com data.

A community contact with an organization whose purpose is to promote community-based development and stability in the AA was reviewed. A primary need in the area is the continuous demand for affordable housing, especially for individuals in the low-income category.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	952	25.9	32.9	19.4	20.6	1.2
Population by Geography	3,443,671	21.5	35.4	22.3	20.4	0.4
Housing Units by Geography	1,476,751	20.7	32.0	21.6	25.0	0.6
Owner-Occupied Units by Geography	628,708	11.7	32.1	28.8	27.1	0.3
Occupied Rental Units by Geography	662,432	25.7	32.2	16.7	24.4	0.9
Vacant Units by Geography	185,611	33.8	31.1	14.4	20.1	0.7
Businesses by Geography	298,907	13.3	24.6	19.2	42.0	0.9
Farms by Geography	2,441	12.7	29.3	24.3	33.3	0.3
Family Distribution by Income Level	734,715	34.0	17.9	16.7	31.3	0.0
Household Distribution by Income Level	1,291,140	33.4	16.4	16.5	33.8	0.0
Median Family Income MSA - 16984 Chicago-Naperville- Evanston, IL		\$75,024	Median Housing Value			\$232,561
			Median Gross Rent			\$1,018
			Families Below Poverty Level			17.0%
<i>Source: 2015 ACS, 2021 D&B Data, and FFIEC Estimated Median Family Income.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	949	22.4	29.8	23.5	22.7	1.6
Population by Geography	3,458,461	19.1	31.7	25.4	23.0	0.8
Housing Units by Geography	1,498,157	18.4	28.9	24.8	26.9	0.9
Owner-Occupied Units by Geography	661,071	11.4	29.5	30.9	27.8	0.5
Occupied Rental Units by Geography	675,623	22.7	28.5	20.6	26.9	1.3
Vacant Units by Geography	161,463	29.4	28.5	17.7	23.2	1.1
Businesses by Geography	394,559	12.1	23.8	21.6	41.5	1.0
Farms by Geography	3,060	14.1	29.2	24.2	31.8	0.7

Family Distribution by Income Level	733,989	32.4	17.4	17.1	33.1	0.0
Household Distribution by Income Level	1,336,694	32.3	16.1	16.0	35.6	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$92,622	Median Housing Value			\$277,678
			Median Gross Rent			\$1,215
			Families Below Poverty Level			12.7%
<i>Source: 2020 ACS, 2022 D&B Data, and FFIEC Estimated Median Family Income.</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Illinois

The bank has two AAs in the state of Illinois, the Chicago MSA and the Illinois Non-MSA. Within the state, The Chicago MSA accounted for 72.7 percent of deposits and 91.3 percent of loans by number. The Illinois Non-MSA accounted for 27.3 percent of deposits and 8.7 percent of loans by number. The Chicago MSA will receive a full-scope review, while the Illinois Non-MSA will receive a limited-scope review. The table below shows the bank's lending in the AAs during the review period:

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Chicago MSA:			
Home Mortgage Loans	253	86.1	91.3
Business Loans	28	9.5	7.5
Farm Loans	0	0.0	0.0
Consumer Loans	13	4.4	1.1
Total Loans	294	100.0	100.0
IL Non-MSA:			
Home Mortgage Loans	3	10.7	6.0
Business Loans	13	46.4	69.2
Farm Loans	8	28.6	23.6
Consumer Loans	4	14.3	1.3
Total Loans	28	100.0	100.0

Source: HMDA LAR and internal bank loan originations for 2020-2022

In the Chicago MSA, home mortgage loans were the bank's primary lending product based on both number and dollar volume. In the Illinois Non-MSA, we performed a limited-scope review. The bank did not originate more than 20 loans in any one product during the evaluation period; therefore, the OCC could not perform a meaningful analysis for the Lending Test.

Conclusions with Respect to Performance Tests in Illinois

LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on full- and limited-scope reviews, the bank's lending performance in the state of Illinois is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state.

Home Mortgage Loans

Please refer to Table O in the *State of Illinois* 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.

2020-2021

The geographic distribution of the bank's home mortgage lending is excellent. The bank's lending in low-income CTs exceeded both the demographic comparator and the aggregate lending in the geography. The bank's lending in moderate-income CTs exceeded both the demographic comparator and the aggregate lending in the geography.

2022

The geographic distribution of the bank's home mortgage lending is excellent. The bank's lending in low-income CTs exceeded both the demographic comparator and the aggregate lending in the geography. The bank's lending in moderate-income CTs exceeded both the demographic comparator and the aggregate lending in the geography.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels.

Home Mortgage Loans

Please refer to Table P in the *State of Illinois* 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.

2020-2021

The borrower distribution of home mortgage lending is excellent. The bank's lending to low-income borrowers was below the demographic comparator but exceeded the aggregate

comparator. The bank's lending to moderate-income borrowers exceeded both the demographic comparator and the aggregate comparator.

2022

The borrower distribution of home mortgage lending is excellent. The bank's lending to low-income borrowers exceeded both the demographic comparator and the aggregate comparator. The bank's lending to moderate-income borrowers exceeded both the demographic comparator and the aggregate comparator.

Responses to Complaints

UFB did not receive any written complaints regarding its CRA performance during the evaluation period.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Illinois Non-MSA AA is weaker than consistent with the bank's overall performance under the Lending Test in the full scope area. A meaningful analysis could not be performed given low loan volume in the AA.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on full- and limited-scope reviews, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Chicago MSA	47	78.3	4,040	95.4
IL Non-MSA	7	11.7	92	2.2
Statewide	6	10.0	105	2.4
Total	60	100.0	4,237	100.0

The bank originated 47 CD loans totaling \$4 million representing 55.9 percent of allocated tier one capital. The bank supported affordable housing needs (eight loans totaling \$1.8 million) and revitalization and stabilization needs (39 loans totaling \$2.2 million) in the AA. Of the 39 loans originated with the purpose of revitalization and stabilization, 38 loans totaling \$2.1 million were SBA PPP loans originated in 2020 and 2021.

Statewide

Additionally, the bank made six loans totaling \$105,000 in the broader statewide area without P/M/F supporting revitalization and stabilization. All six loans supported revitalization and stabilization needs (totaling \$105,000).

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago MSA	0	0	36	224	36	81.8	224	0.5	0	0
IL Non-MSA	0	0	3	1	3	6.8	1	0.1	0	0
Statewide	4	22,656	1	11,930	5	11.4	34,586	99.4	0	0
Total	4	22,656	40	12,155	44	100.0	34,811	100.0	0	0

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

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

Chicago MSA

The bank made 36 donations and grants totaling \$224,000 with the primary purpose to support organizations assisting with affordable housing needs and community services in the AA.

Statewide

The bank made one statewide investment totaling \$11.9 million supporting affordable housing without a P/M/F to benefit the bank's AAs. Additionally, the bank had four prior period

statewide investments totaling \$22.7 million supporting affordable housing without a P/M/F to benefit the bank's AAs.

Extent to Which the Bank Provides Community Development Services

Chicago MSA

During the evaluation period, three employees performed 223 hours of CD services for 12 organizations. These employees represented 27.3 percent of employees at these branches. The three employees provided financial literacy courses and homeownership counseling. One employee serves in multiple leadership roles, serving on the board of five organizations.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Illinois Non-MSA AA is consistent with the bank's overall performance under the CD Test in the full scope area.

State of Indiana

CRA rating for the State of Indiana: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank exhibits reasonable geographic distribution of loans in the state.
- UFB's CD performance demonstrates excellent responsiveness to the CD needs of its AA through CD loans, qualified investments and donations, and CD services.
- The bank received no CRA-related complaints during the evaluation period.

Description of Institution's Operations in Indiana

Evansville, IN-KY MSA

The Evansville, IN-KY MSA (Evansville MSA), encompasses all of Posey, Warrick, and Vanderburgh Counties in Indiana. In 2020 and 2021, the AA consisted of 67 CTs with ten low-income CTs, 13 moderate-income CTs, 28 middle-income CTs, and 14 upper-income CTs. There were two CTs in the AA in 2020 and 2021 that were not assigned an income classification. In 2022, the CTs in the AA changed due to new 2020 U.S. Census data resulting in the addition of 15 CTs for a total of 82. As of 2022 there are ten low-income CTs, 18 moderate-income CTs, 27 middle-income CTs, and 21 upper income CTs. There were also six CTs in the AA that were not assigned an income classification as of 2022.

UFB has seven branches in the AA, of which three are in moderate-income CTs, two are in middle-income CTs, one is in an upper-income CT, and one is in an unclassified CT. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. The total population of the AA was 269,256; and the largest city in the AA is Evansville, IN.

UFB has strong competition within the AA. As of June 30, 2022, there were 15 financial institutions operating 73 banking offices within the AA, including UFB. Competition in the AA included local community banks as well as branches of large regional banks. The June 30, 2022, FDIC Deposit Market Share Report shows UFB ranked 2nd in market share at 22.5 percent. UFB's major competitors in the AA were Old National Bank (37.2 percent market share) and Fifth Third Bank, National Association (19.8 percent market share).

On average, the unemployment rates for the Evansville, IN MSA were at or below the state unemployment rates for 2020, 2021, and 2022.

Economic conditions of the AA prior to the COVID-19 pandemic were slightly better than those of the state of Indiana. The Evansville MSA unemployment rate was 2.8 percent compared with the state of Indiana's 2.9 percent unemployment rate going into the pandemic. At the peak of the

pandemic in April 2020, the unemployment rate in the AA reached a high of 15 percent. The state of Indiana peaked at 16.4 percent in April of 2020. The 2021 and 2022 unemployment rates improved significantly for both the AA and the state.

Unemployment Rates			
	2020	2021	2022
Indiana	4.5	2.5	2.6
Evansville MSA	4.0	2.5	2.5

According to the 2020 ACS Census data, 63.5 percent of housing in the AA was owner-occupied, 27.3 percent was renter-occupied, and 9.2 percent was vacant. In low-income CTs in the AA, 35.4 percent of housing was owner-occupied, 44.1 percent was renter-occupied, and 20.5 percent was vacant. In moderate-income CTs, 49 percent of housing was owner-occupied, 39.7 percent was renter-occupied, and 11.3 percent was vacant. The median gross rent was \$828; the median housing value was \$139,766; and 8.8 percent of families in the AA live below the federal poverty level.

Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$41,850 per year (or less than 50 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$194,897 mortgage with a payment of \$1,046 per month. A moderate-income borrower making \$66,960 per year (or less than 80 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$311,835 mortgage with a payment of \$1,674 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,315. The median housing value in the AA was \$139,000 and \$245,000 in 2020 and 2022, respectively, reflecting a change of 76.3 percent according to Realtor.com data.

According to the August 2023 Moody's Analytics report, the AA strengths are large and growing healthcare industry, high earnings in dominant manufacturing, concentration of educational institutions, and low business costs. The leading industries by wage tier include offices of physicians; management of companies and enterprises; resin, synthetics, rubber, fibers, and filament manufacturing; and Federal Government. Major employers include Deaconess Hospital, Toyota Motor Manufacturing Indiana Inc., St. Vincent, Berry Global, and University of Southern Indiana.

A community contact with an organization whose purpose is to promote economic development and stability in the AA was reviewed. A primary need in the area is the continuous demand for affordable housing, especially for individuals in the low-income category. The need for readily available small business loans is also an opportunity for banks to support the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Evansville MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	67	14.9	19.4	41.8	20.9	3.0
Population by Geography	267,867	9.5	17.4	41.7	31.3	0.2
Housing Units by Geography	119,357	10.6	19.6	41.4	28.1	0.3
Owner-Occupied Units by Geography	74,045	6.0	12.4	43.9	37.6	0.1
Occupied Rental Units by Geography	33,153	17.1	33.1	37.0	12.2	0.6
Vacant Units by Geography	12,159	21.0	26.1	38.1	14.1	0.6
Businesses by Geography	22,695	8.2	18.6	35.6	33.0	4.6
Farms by Geography	955	3.7	8.1	49.3	38.3	0.6
Family Distribution by Income Level	69,352	20.6	17.4	20.5	41.6	0.0
Household Distribution by Income Level	107,198	22.5	17.1	17.5	42.9	0.0
Median Family Income MSA - 21780 Evansville, IN-KY MSA		\$61,595	Median Housing Value			\$120,546
			Median Gross Rent			\$710
			Families Below Poverty Level			10.6%
<i>Source: 2015 ACS, 2021 D&B Data, and FFIEC Estimated Median Family Income.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Evansville MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	82	12.2	22.0	32.9	25.6	7.3
Population by Geography	269,256	8.3	21.4	34.7	35.3	0.2
Housing Units by Geography	122,339	9.9	23.4	35.5	30.7	0.4
Owner-Occupied Units by Geography	77,717	5.5	18.1	39.3	36.9	0.2
Occupied Rental Units by Geography	33,345	16.0	34.1	29.2	20.1	0.5
Vacant Units by Geography	11,277	22.0	28.7	28.0	20.0	1.4
Businesses by Geography	25,951	7.9	20.9	28.5	36.1	6.6
Farms by Geography	1,060	2.7	9.5	47.5	38.7	1.5
Family Distribution by Income Level	71,053	20.5	17.6	20.8	41.2	0.0
Household Distribution by Income Level	111,062	22.7	16.7	17.5	43.1	0.0
Median Family Income MSA - 21780 Evansville, IN-KY MSA		\$72,963	Median Housing Value			\$139,766

		Median Gross Rent	\$828
		Families Below Poverty Level	8.8%

Source: 2020 ACS, 2022 D&B Data, and FFIEC Estimated Median Family Income.
 (*) The NA category consists of geographies that have not been assigned an income classification.

Indianapolis-Carmel-Anderson, IN MSA

The Indianapolis-Carmel-Anderson, IN MSA (Carmel MSA) encompasses all of Hamilton County in Indiana. In 2020 and 2021, the AA consisted of 39 CTs with zero low-income CTs, two moderate-income CTs, six middle-income CTs, and 31 upper-income CTs. In 2022, the CTs in the AA changed due to new 2020 U.S. Census data resulting in the addition of 18 CTs for a total of 57. As of 2022 there are zero low-income CTs, zero moderate-income CTs, 20 middle-income CTs, and 37 upper income CTs.

UFB has one branch in the AA, which is in a middle-income CT. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. The total population of the AA was 347,467; and the largest city in the AA is Indianapolis, IN.

UFB has strong competition within the AA. As of June 30, 2022, there were 27 financial institutions operating 108 banking offices within the AA, including UFB. Competition in the AA included local community banks as well as branches of large regional and national banks. The June 30, 2022, FDIC Deposit Market Share Report shows UFB ranked 13th in market share at 1.7 percent. UFB’s major competitors in the AA were Merchants Bank of Indiana (28.5 percent market share) and First Internet Bank of Indiana (16.3 percent market share).

On average, the unemployment rates for the Carmel MSA were at or below the state unemployment rates for 2021 and 2022 and at or above the state unemployment rates for 2020.

Economic conditions of the AA prior to the COVID-19 pandemic were slightly better than those of the state of Indiana. The Carmel MSA unemployment rate was 2.6 percent compared with the state of Indiana’s 2.9 percent unemployment rate going into the pandemic. At the peak of the pandemic in April 2020, the unemployment rate in the AA reached a high of 12.7 percent. The state of Indiana peaked at 16.4 percent in April of 2020. The 2021 and 2022 unemployment rates improved significantly for both the AA and the state.

Unemployment Rates			
	2020	2021	2022
Indiana	4.5	2.5	2.6
Carmel MSA	4.6	2.4	2.3

According to the 2020 ACS Census data, 72.9 percent of housing in the AA was owner-occupied, 22.1 percent was renter-occupied, and 5 percent was vacant. There are no low- or moderate-income CTs in the AA. The median gross rent was \$1,195; the median housing value was \$285,039; and 3 percent of families in the AA live below the federal poverty level.

Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$45,950 per year (or less than 50 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$213,991 mortgage with a payment of \$1,149 per month. A moderate-income borrower making \$73,250 per year (or less than 80 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$342,386 mortgage with a payment of \$1,838 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,578. The median housing value in the AA is \$264,950 and \$294,000 in 2020 and 2022, respectively, reflecting a change of 11 percent according to Realtor.com data.

According to the August 2023 Moody's Analytics report, the AA strengths are diversified industrial structure and well-developed distribution network, in-demand and growing pharmaceutical industry, high birthrate, strong migration trends, and low business and living costs. The leading industries by wage tier include offices of physicians, computer systems design and related services, insurance carriers, and Federal Government. Major employers include Indiana University Health, St. Vincent Hospitals and Health Services, Community Health Network, Eli Lilly and Co., and Walmart Inc.

A community contact with an organization whose purpose is to promote economic development and stability in the AA was reviewed. The primary needs in the area are small business loans and financial literacy courses focused on small businesses as well as general education.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Carmel MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	5.1	15.4	79.5	0.0
Population by Geography	296,635	0.0	2.4	11.8	85.9	0.0
Housing Units by Geography	113,759	0.0	3.0	12.4	84.7	0.0
Owner-Occupied Units by Geography	84,806	0.0	1.5	11.5	87.0	0.0
Occupied Rental Units by Geography	23,447	0.0	6.9	14.3	78.7	0.0
Vacant Units by Geography	5,506	0.0	8.0	17.7	74.4	0.0
Businesses by Geography	44,668	0.0	5.2	8.1	86.6	0.0
Farms by Geography	1,094	0.0	3.7	20.2	76.1	0.0
Family Distribution by Income Level	80,098	8.6	11.1	15.9	64.3	0.0
Household Distribution by Income Level	108,253	10.5	10.7	14.1	64.7	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$228,525

		Median Gross Rent	\$1,042
		Families Below Poverty Level	3.5%
<i>Source: 2015 ACS, 2021 D&B Data, and FFIEC Estimated Median Family Income.</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Table A – Demographic Information of the Assessment Area						
Assessment Area: Carmel MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	0.0	0.0	35.1	64.9	0.0
Population by Geography	347,467	0.0	0.0	29.0	71.0	0.0
Housing Units by Geography	129,573	0.0	0.0	33.5	66.5	0.0
Owner-Occupied Units by Geography	94,391	0.0	0.0	27.5	72.5	0.0
Occupied Rental Units by Geography	28,675	0.0	0.0	50.0	50.0	0.0
Vacant Units by Geography	6,507	0.0	0.0	47.1	52.9	0.0
Businesses by Geography	53,787	0.0	0.0	35.4	64.6	0.0
Farms by Geography	1,239	0.0	0.0	43.4	56.6	0.0
Family Distribution by Income Level	92,017	9.0	12.4	18.8	59.8	0.0
Household Distribution by Income Level	123,066	10.7	10.3	17.4	61.5	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$80,981	Median Housing Value			\$285,039
			Median Gross Rent			\$1,195
			Families Below Poverty Level			3.0%
<i>Source: 2020 ACS, 2022 D&B Data, and FFIEC Estimated Median Family Income.</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Indiana

The bank has three AAs in the state of Indiana, the Evansville MSA, the Carmel MSA, and the Indiana Non-MSA. Within the state, the Evansville MSA represents the largest AA in the state with 86.1 percent of deposits and 66.8 percent of loans by number. The Carmel MSA accounted for 13 percent of deposits and 30.4 percent of loans by number. The Indiana Non-MSA accounted for 0.9 percent of deposits and 2.8 percent of loans by number. The Evansville MSA and Carmel MSA received full-scope reviews, while the Indiana Non-MSA received a limited-scope review. The table below shows the bank's lending in the AAs during the review period.

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Evansville MSA:			
Home Mortgage Loans	135	46.2%	67.9%
Business Loans	107	36.6%	29.8%
Farm Loans	4	1.4%	1.0%
Consumer Loans	46	15.8%	1.3%
Total Loans	292	100.0%	100.0%
Carmel MSA:			
Home Mortgage Loans	92	69.2%	99.1%
Business Loans	40	30.1%	0.9%
Farm Loans	0	0.0%	0.0%
Consumer Loans	1	0.8%	0.0%
Total Loans	133	100.0%	100.0%
IN Non-MSA:			
Home Mortgage Loans	3	25.0%	51.4%
Business Loans	7	58.3%	29.7%
Farm Loans	1	8.3%	17.4%
Consumer Loans	1	8.3%	1.5%
Total Loans	12	100.0%	100.0%

Source: HMDA LAR and internal bank loan originations for 2020-2022

In the Evansville MSA and Carmel MSA, home mortgage loans and business loans were the bank's primary lending products based on both number and dollar volume. More weight was placed on the distribution of loans to borrower of different income levels and businesses of different size than the geographic distribution due to the lower level of LMI CTs in the AAs. The 2020-2021 analysis was given more weight than the 2022 analysis in both the Evansville MSA and Carmel MSA based on lending volume of small business loans and home mortgage loans.

A limited-scope review was performed on the Indiana Non-MSA. The bank did not originate more than 20 loans in any one product during the evaluation period, therefore the OCC could not perform a meaningful analysis.

Conclusions with Respect to Performance Tests in Indiana

LENDING TEST

The bank's performance under the Lending Test in Indiana is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full and limited-scope reviews, the bank's lending performance in the state of Indiana is excellent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Please refer to Table O in the *State of Indiana* 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.

Evansville MSA

The geographic distribution of home mortgage loans in the Evansville MSA is excellent.

2020-2021

The geographic distribution of the bank's home mortgage lending is excellent. The bank's lending in low-income CTs was below the percentage of the demographic comparator and within reasonable range of the aggregate lending in the geography. The bank's lending in moderate-income CTs exceeded both the demographic comparator and the aggregate lending in the geography.

2022

The geographic distribution of the bank's home mortgage lending is reasonable. The bank's did not originate loans in low-income CTs. The bank's lending in moderate-income CTs exceeded both the demographic comparator and the aggregate lending in the geography.

Carmel MSA

The geographic distribution of home mortgage loans in the Carmel MSA is excellent.

2020-2021

The geographic distribution of the bank's home mortgage lending is excellent. There were no low-income geographies in the AA. The bank's lending in moderate-income CTs exceeded both the demographic comparator and the aggregate lending in the geography.

2022

There are no LMI CTs in the AA, therefore a geographic analysis was not meaningful.

Small Loans to Businesses

Please refer to Table Q in the *State of Indiana* 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.

Evansville MSA

The geographic distribution of small loans to businesses in the Evansville MSA is poor.

2020-2021

The overall geographic distribution of small loans to businesses in LMI CTs is poor. The bank originated 1.1 percent of loans in low-income CTs, well below both the demographic and aggregate lending comparators. In moderate-income CTs, the bank originated 7.5 percent of loans, below both the demographic and aggregate lending comparators. Lending small dollar business loans is outside the bank's business strategy of multi-family affordable housing loans, which are generally over \$1 million.

2022

The bank originated less than 20 loans in 2022, therefore examiners could not perform a meaningful analysis on the lending performance in the AA.

Carmel MSA

The geographic distribution of small loans to businesses in the Carmel MSA is poor.

2020-2021

The overall geographic distribution of small loans to businesses in LMI CTs is poor. There are no low-income CTs in the AA; however, the bank also did not originate any loans in the two moderate-income CT. Moderate-income CTs comprise 5.1 percent of the CTs in the AA. The bank is located adjacent to one moderate-income CT; however, the other moderate-income CT is located approximately 11 miles away in another municipality in the county.

2022

The bank originated less than 20 loans in 2022, and due to the changes in CT designations, there were no LMI CTs in the AA. Therefore, examiners could not perform a meaningful analysis on the lending performance in the AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Please refer to Table P in the *State of Indiana* 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.

Evansville MSA

The borrower distribution of home mortgage loans in the Evansville MSA is excellent.

2020-2021

The borrower distribution of home mortgage lending is excellent. The bank's lending to low-income borrowers was below the demographic comparator but exceeded the aggregate comparator. The bank's lending to moderate-income borrower exceeded the demographic comparator and within reasonable range of the aggregate comparator.

2022

The borrower distribution of home mortgage lending was reasonable. The bank's lending to low-income borrowers exceeded both the demographic and aggregate comparators. The bank's lending to moderate-income borrower was below both the demographic and the aggregate comparator.

Carmel MSA

The borrower distribution of home mortgage loans in the Carmel MSA is excellent.

2020-2021

The borrower distribution of home mortgage lending is excellent. The bank's lending to low-income borrowers exceeded both the demographic and aggregate comparators. The bank's lending to moderate-income borrowers exceeded both the demographic and aggregate comparators.

2022

The borrower distribution of home mortgage lending was reasonable. The bank's lending to low-income borrowers exceeded both the demographic and aggregate comparators. The bank's lending to moderate-income borrower was below both the demographic and the aggregate comparator.

Small Loans to Businesses

Please refer to Table R in the *State of Indiana* 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.

Evansville MSA

The distribution of loans to businesses of different sizes in the Evansville MSA is reasonable.

2020-2021

The overall distribution of loans to businesses of different sizes is reasonable. The bank's lending was below both the demographic comparator and the aggregate peer lending. Included in this analysis were 70 PPP loans totaling \$3.43 million that helped support small businesses during the Covid-19 pandemic.

Examiners considered the impact of significant higher unavailable business revenue data for UFB small loans to businesses. For 75.3 percent of small loans to businesses in the Evansville MSA, borrower revenue was not available. All of these loans were PPP loans, which did not require the bank to collect or consider gross annual revenues. The bank's PPP lending was positively considered in our assessment of the distribution of loans by income level of the borrower.

2022

The bank originated less than 20 loans in 2022, therefore examiners could not perform a meaningful analysis on the lending performance in the AA.

Carmel MSA

The distribution of loans to businesses of different sizes in the Carmel MSA is reasonable.

2020-2021

The overall distribution of loans to businesses of different sizes is reasonable. The bank's lending was well below the demographic comparator but within a reasonable range below the aggregate peer lending. Included in this analysis were 24 PPP loans totaling \$1 million that helped support small businesses during the Covid-19 pandemic.

Examiners considered the impact of significant higher unavailable business revenue data for UFB small loans to businesses. For 66.7 percent of small loans to businesses in the Carmel MSA, borrower revenue was not available. All of these loans were PPP loans, which did not require the bank to collect or consider gross annual revenues. The bank's PPP lending was positively considered in our assessment of the distribution of loans by income level of the borrower.

2022

The bank originated less than 20 loans in 2022, therefore examiners could not perform a meaningful analysis on the lending performance in the AA.

Responses to Complaints

UFB did not receive any written complaints regarding its CRA performance during the evaluation period.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Indiana Non-MSA is consistent with the bank's overall performance under the Lending Test in the full scope areas. The bank originated only three HMDA reportable loans in the AA during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Indiana is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full- and limited-scope reviews, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Evansville MSA	63	40.4	27,958	3.6
Carmel MSA	60	38.5	749,389	95.4
IN Non-MSA	4	2.6	35	0.1
Statewide	29	18.5	8,473	0.9
Total	156	100.0	785,855	100.0

Evansville MSA

The bank originated 63 CD loans totaling \$28 million representing 9 percent of allocated tier 1 capital. The bank supported affordable housing needs (five loans totaling \$25.9 million) and revitalizations and stabilizations needs (58 loans totaling \$2.1 million) in the AA. All 58 loans with the purpose of revitalization and stabilization were SBA PPP loans.

Carmel MSA

The bank originated 60 CD loans totaling \$749 million representing 1594.7 percent of allocated tier 1 capital. The bank supported affordable housing needs (29 loans totaling \$539 million), economic development needs (14 loans totaling \$209 million), and revitalization and stabilization needs (17 loans totaling \$857 thousand) in the AA. All 17 loans with the purpose of revitalization and stabilization were SBA PPP loans.

Statewide

Additionally, the bank made 29 loans totaling \$8.5 million in the broader statewide area without P/M/F supporting revitalization and stabilization. The loans supported affordable housing (one loan totaling \$4.5 million), community services (one loan totaling \$200,000), and revitalization and stabilization needs (27 loans totaling \$3.1 million).

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Evansville MSA	1	902	35	27	36	61.3	929	19.8	0	0
Carmel MSA	0	0	7	20,719	7	11.3	20,719	19.3	0	0
IN Non-MSA	0	0	4	4	4	6.5	4	0.1	0	0
Statewide	12	60,334	1	5,206	13	21.0	65,540	60.8	0	0
Total	1	902	46	20,796	47	100.0	21,698	100.0	0	0

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

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

Evansville MSA

The bank made two current period investments totaling \$20.5 million supporting affordable housing during the evaluation period. Additionally, the bank made 35 current period donations and grants totaling \$27,000 with the purpose of supporting affordable housing, community services, and economic development activities in the AA. The bank had one prior period investment totaling \$902,000 supporting affordable housing.

Carmel MSA

The bank made two current period investments totaling \$20.7 million supporting affordable housing during the evaluation period. Additionally, the bank made five current period donations and grants totaling \$37,000 with the purpose to support affordable housing and community service needs in the AA.

Statewide

Additionally, the bank made one current period investment totaling \$5.2 million in the broader statewide area without P/M/F supporting affordable housing. The bank held 12 prior period investments totaling \$60.3 million supporting affordable housing.

Extent to Which the Bank Provides Community Development Services

Evansville MSA

During the evaluation period, 41 employees performed 972 hours of CD services, supporting 38 organizations. These employees represented 33 percent of the employees in these branches. Employees served in a variety of roles including assisting with fundraising for LMI centered organizations, financial literacy classes, homeownerships counseling, and mentor. Ten employees serve in a leadership role as either a board or committee member for 13 different organizations.

Carmel MSA

During the evaluation period, three employees performed 94 hours of community services, supporting five organizations. These employees represented 48 percent of the employees in these branches. Employees served in a variety of roles including assisting with fundraising for LMI centered organizations and financial literacy classes. One member also serves on the board of an organization in a leadership role.

Conclusions for Area Receiving a Limited Scope Review

Based on limited-scope review, the bank's performance under the CD Test in the Indiana Non-MSA is weaker than the bank's overall performance under the CD Test in the full scope areas. Activities in the Indiana Non-MSA AA are significantly lower as the bank made four donations and four CD loans while participating in 87 hours of CD services during the evaluation period. The weaker performance in the limited-scope area did not negatively impact the overall rating.

Territory Rating

U.S. Virgin Islands

CRA rating for the U.S. Virgin Islands: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank exhibits reasonable geographic distribution of loans in the territory.
- UFB's CD performance demonstrates excellent responsiveness to the CD needs of its AA through CD loans, qualified investments and donations, and CD services.
- The bank did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in U.S. Virgin Islands

St. Croix AA

The Virgin Islands Non-MSA (St. Croix AA) encompasses the entire island of St. Croix, located in the USVI. In 2020 and 2021, the AA consisted of 16 CTs, with one low-income CTs, four moderate-income CTs, seven middle-income CTs, and three upper-income CTs. There was also one CT in 2020 and 2021 in the AA that was not assigned an income classification. In 2022, the CTs in the AA changed due to new 2020 U.S. Census data. While there was no change in the overall number of CTs in the AA, there was change in the demographic characteristics of the AA. As of 2022, there are zero low-income CTs, six moderate-income CTs, six middle-income CTs, and three upper-income CTs. There was also one CT that was not assigned an income classification as of 2022.

UFB has two branches in the AA, with one located within a moderate-income CT and one located within a middle-income CT. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. The total population of the AA was 41,004; and the largest city in the AA is Christiansted.

Competition for deposits within the AA is very low. As of June 30, 2022, there were four financial institutions operating nine banking offices within the AA, including UFB. Competition in the AA included regional banks headquartered in Puerto Rico. The June 30, 2022, FDIC Deposit Market Share Report shows UFB ranked first in market share at 33.8 percent. UFB's major competitors in the AA were Banco Popular De Puerto Rico, Hato Rey, San Juan (26.7 percent market share) and Firstbank Puerto Rico, San Juan, Puerto Rico (26.6 percent market share).

On average unemployment rates for the St. Croix AA were at or below the USVI unemployment rates for 2020 and at or above the USVI unemployment rates for 2021 and 2022 due to the lingering effects of the COVID-19 pandemic on the tourism-heavy local economy.

Economic conditions of the AA prior to the COVID-19 pandemic were slightly better than those of the USVI. The St. Croix AA unemployment rate was 5.4 percent compared with the USVI's 6 percent unemployment rate going into the pandemic. At the peak of the pandemic in June 2020, the unemployment rate in the AA reached a high of 11.1 percent. The USVI peaked at 13.5 percent in June of 2020. The December 2021 unemployment rates declined for the AA as continued travel bans, including cruise travel, limited tourism in the AA due to the COVID-19 pandemic. The December 2022 unemployment rates improved significantly for both the AA and the USVI as travel bans eased, and cruise travel resumed normal operations.

Unemployment Rates			
	2020	2021	2022
U.S. Virgin Islands	9.4	8.8	4.9
St. Croix AA	8.2	9.5	6.1

According to the 2020 ACS Census data, 39.5 percent of housing in the AA was owner-occupied, 31.5 percent was renter-occupied, and 29 percent was vacant. There are no low income CTs in the AA. In moderate-income CTs, 29.7 percent of housing was owner-occupied, 39.1 percent was renter-occupied, and 31.2 percent was vacant.

Table A – Demographic Information of the Assessment Area						
Assessment Area: St. Croix AA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	6.2	25.0	43.8	18.8	6.2
Population by Geography	50,601	4.4	31.7	42.6	21.3	0.0
Housing Units by Geography	25,275	3.5	34.5	38.5	23.5	0.0
Owner-Occupied Units by Geography	11,071	2.0	24.8	46.0	27.2	0.0
Occupied Rental Units by Geography	8,694	6.8	42.3	34.5	16.4	0.0
Vacant Units by Geography	5,510	1.6	41.8	29.5	27.1	0.0
Businesses by Geography	0	0.0	0.0	0.0	0.0	0.0
Farms by Geography	0	0.0	0.0	0.0	0.0	0.0
Family Distribution by Income Level	12,641	0.0	0.0	0.0	0.0	0.0
Household Distribution by Income Level	19,765	0.0	0.0	0.0	0.0	0.0
Median Family Income U.S. Virgin Islands		\$45,058	Median Housing Value			\$0
			Median Gross Rent			\$0
			Families Below Poverty Level			0.0%

Source: 2015 ACS, 2021 D&B Data, and FFIEC Estimated Median Family Income.
 (*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: St. Croix AA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	37.5	37.5	18.8	6.2
Population by Geography	41,004	0.0	37.0	43.8	19.2	0.0
Housing Units by Geography	25,470	0.0	38.3	39.7	22.0	0.0
Owner-Occupied Units by Geography	10,072	0.0	28.8	46.5	24.7	0.0
Occupied Rental Units by Geography	8,011	0.0	47.6	37.9	14.5	0.0
Vacant Units by Geography	7,387	0.0	41.2	32.4	26.4	0.0
Businesses by Geography	283	0.0	100.0	0.0	0.0	0.0
Farms by Geography	12	0.0	100.0	0.0	0.0	0.0
Family Distribution by Income Level	10,327	0.0	0.0	0.0	0.0	0.0
Household Distribution by Income Level	18,083	0.0	0.0	0.0	0.0	0.0
Median Family Income U.S. Virgin Islands		\$52,000	Median Housing Value			\$0
			Median Gross Rent			\$0
			Families Below Poverty Level			0.0%

Source: 2020 ACS, 2022 D&B Data, and FFIEC Estimated Median Family Income.
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in U.S. Virgin Islands

The St. Croix AA is the only AA in the USVI and received a full-scope review. The table below shows the bank’s lending in the AA during the review period.

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Home Mortgage Loans	74	25.7%	59.5%
Business Loans	113	39.2%	35.9%
Farm Loans	0	0.0%	0.0%
Consumer Loans	101	35.1%	4.6%
Total Loans	288	100.0%	100.0%

Source: Internal bank loan originations for 2020-2022

Home mortgage and business loans are the bank's primary lending products in the AA. More weight was placed on the borrower distribution over the geographic distribution due to low or no low-income CTs in the AA. The OCC used the bank's internal loan reports for both home mortgage and business loans as home mortgage loans originated in the USVI are not reported on the HMDA LAR.

Demographic and aggregate lending data in the USVI is collected differently from the general U.S. Census data; therefore, the information available to compare lending activity is limited and generally delayed. The aggregate lending data for home mortgage loans in 2022 was not available. The demographic data for low-, moderate-, middle-, and upper-income families was not available for all three years of the evaluation period for comparison of home mortgage lending performance. Demographic data for percentage of businesses located in each CT was not available for 2022. All these factors were taken into consideration when assessing lending performance and placing more weight to the 2020-2021 analyses over the 2022 analyses.

Conclusions with Respect to Performance Tests in U.S. Virgin Islands

LENDING TEST

The bank's performance under the Lending Test in USVI is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the USVI is excellent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Please refer to Table O in the *U.S. Virgin Islands* 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.

2020-2021

UFB's lending to geographies of different income levels in the AA was excellent. The bank did not originate any loans in low-income CTs; however, there are only 2 percent of owner-occupied housing in low-income CTs making it difficult to find lending opportunities in the area. In moderate-income CTs, lending performance exceeded the demographic and aggregate lending comparators. Also, all middle-income geographies were designated as distressed where 15 percent of the bank's originations were located.

2022

The bank did not originate enough loans in 2022 to perform a meaningful analysis.

Small Loans to Businesses

Please refer to Table Q in the *U.S. Virgin Islands* 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 geographic distribution of small loans to businesses in the St. Croix AA is reasonable.

2020-2021

The overall geographic distribution of small loans to businesses is reasonable. There is only one low-income CT in the AA, and there are no businesses located in that CT. Therefore, the bank made no small loans to businesses in the low-income CT. The bank's lending in moderate-income CTs is within reasonable range below the percentage of businesses and aggregate lending in those CTs. Also, all middle-income geographies were designated as distressed where 14.6 percent of the bank's origination were located.

2022

The overall geographic distribution of small loans to businesses is excellent. The bank's lending in moderate-income CTs exceeded the aggregate lending comparator. There were no low-income CTs in the AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Please refer to Table P in the *U.S. Virgin Islands* 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.

2020-2021

The borrower distribution of home mortgage loans is excellent. Lending to moderate-income borrowers exceeded the aggregate lending comparator. There were no loans originated to low-income families; however, the aggregate comparator was also zero; and the demographic data was not available for comparison.

2022

The bank did not originate enough loans in 2022 to perform a meaningful analysis.

Small Loans to Businesses

Please refer to Table R in the *U.S. Virgin Islands* 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.

2020-2021

UFB’s distribution of loans to business of different revenue sizes is excellent. The lending was consistent with the aggregate performance but below the demographic comparator.

Examiners considered the impact of significantly higher unavailable business revenue data for UFB small loans to businesses. For 66.3 percent of small loans to businesses originated in the AA, borrower revenue was not available. Of these loans with revenue not available, 56 of the 59 loans, or 94.9 percent, were PPP loans, which did not require the bank to collect or consider gross annual revenues. The bank’s PPP lending was positively considered in our assessment of the distribution of loans by income level of the borrower.

2022

The bank did not originate enough loans in 2022 to perform a meaningful analysis.

Responses to Complaints

UFB did not receive any written complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank’s performance under the Community Development Test in the USVI is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the territory through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for CD in the bank’s AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
St. Croix AA	415	100	87,856	100

The bank originated 415 CD loans totaling \$88 million representing 144.8 percent of allocated tier 1 capital. The bank supported affordable housing needs (two loans totaling \$548,000), community service needs (three loans totaling \$3.6 million), and revitalization and stabilization

needs (410 loans totaling \$84 million) in the AA. Of the 410 loans originated with the purpose of revitalization and stabilization, 388 loans totaling \$37.1 million were SBA PPP loans originated in 2020 and 2021.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
St. Croix AA	0	0	15	151	15	100	151	100	0	0

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

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

The bank made 15 current period donations and grants totaling \$151,150 to organizations who support affordable housing and community service needs in the AA.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, two employees provided 57 hours of CD services to three different community organizations. These employees represent 8 percent of employees at the branches in this AA. One employee serves on the board of an organization that supports the revitalization and stabilization of Christiansted and taught a financial literacy class. Another employee participated in a fundraiser supporting LMI women.

Appendix A: Scope of Examination

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

Time Period Reviewed:	January 1, 2020 to December 31, 2022	
Bank Products Reviewed:	Home mortgage and small business Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Village Capital Corporation	Wholly owned subsidiary	Business loans
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
California		
Los Angeles MSA	Full-scope	Los Angeles and Orange counties (2022 only)
Colorado		
Denver MSA	Full-scope	Arapahoe, Denver, and Jefferson Counties
Florida		
Cape Coral MSA	Full-scope	Lee County
Crestview MSA	Full-scope	Okaloosa County (2021-2022 only)
Illinois		
Chicago MSA	Full-scope	Cook County
Illinois Non-MSA	Limited-scope	Effingham and Fayette counties
Indiana		
Evansville MSA	Full-scope	Posey, Vanderburgh, and Warrick counties
Indiana Non-MSA	Limited-scope	Gibson County
Carmel MSA	Full-scope	Hamilton County
U.S. Virgin Islands		
St. Croix AA	Full-scope	Saint Croix Island

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
United Fidelity Bank	Outstanding	Outstanding	Outstanding
MMSA or State:			
California	Not Meaningful	Satisfactory	Satisfactory
Colorado	Outstanding	Satisfactory	Outstanding
Florida	Outstanding	Outstanding	Outstanding
Illinois	Outstanding	Outstanding	Outstanding
Indiana	Outstanding	Outstanding	Outstanding
U.S. Virgin Islands	Outstanding	Outstanding	Outstanding

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: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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.

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

Table 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.

State of California

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Los Angeles MSA	2	1,306,000	100.0	229,740	1.4	0.0	1.9	16.9	50.0	16.3	31.8	50.0	30.7	49.5	0.0	50.5	0.4	0.0	0.6

Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate

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

Los Angeles MSA	2	1,306,000.00	100.0	229,740	23.8	0.0	4.4	16.5	50.0	7.0	17.9	0.0	14.2	41.8	50.0	56.4	0.0	0.0	18.0
<i>Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																			

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

State of Colorado

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Denver MSA	160	42,993,418	100.0	173,099	5.4	27.5	5.8	18.9	68.1	19.3	36.7	3.1	36.1	39.0	1.3	38.7	0.0	0.0	0.0

Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Denver MSA	24	47,902,781	100.0	80,690	2.6	16.7	3.0	21.1	58.3	22.4	41.6	16.7	40.5	34.0	0.0	33.2	0.7	8.3	0.9

Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

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

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Denver MSA	160	42,993,418	100.0	173,099	22.9	22.5	8.6	17.9	69.4	19.1	19.9	5.6	21.5	39.3	1.9	33.5	0.0	0.6	17.2	
Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Denver MSA	24	47,902,781	100.0	80,690	21.2	33.3	8.5	18.5	54.2	19.2	21.6	4.2	21.8	38.7	0.0	36.4	0.0	8.3	14.1	
Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

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

State of Florida

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Cape Coral MSA	26	15,578,398.07	65.0	55,246	2.1	0.0	1.4	18.6	61.5	19.6	44.2	19.2	44.7	35.1	19.2	34.3	0.0	0.0	0.0
Crestview MSA	14	57,882,275.00	35.0	17,088	0.0	0.0	0.0	2.4	21.4	2.4	74.8	57.1	71.1	22.8	21.4	26.5	0.0	0.0	0.0
Total	40	73,460,673.07	100.0	72,334	1.6	0.0	1.1	15.1	47.5	15.5	50.8	32.5	50.9	32.5	20.0	32.4	0.0	0.0	0.0

Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

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

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% 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	
Cape Coral 2022	13	80,172,704.00	72.2	34,940	1.0	0.0	0.9	17.1	69.2	18.2	49.6	30.8	50.1	32.1	0.0	30.2	0.2	0.0	0.6	
Crestview MS A 2022	5	1,731,700.00	27.8	10,391	1.9	0.0	1.8	17.9	0.0	19.0	47.4	60.0	46.3	32.8	40.0	33.0	0.0	0.0	0.0	
Total	18	81,904,404.00	100.0	45,331	1.1	0.0	1.1	17.3	50.0	18.3	49.2	38.9	49.3	32.2	11.1	30.8	0.2	0.0	0.5	

Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

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

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cape Coral MSA	26	15,578,398.07	65.0	55,246	20.7	15.4	3.8	18.5	65.4	15.4	19.7	0.0	19.9	41.1	3.8	44.3	0.0	15.4	16.6
Crestview MSA	14	57,882,275.00	35.0	17,088	19.1	0.0	4.1	17.2	42.9	15.2	21.6	0.0	18.3	42.2	0.0	30.8	0.0	57.1	31.6
Total	40	73,460,673.07	100.0	72,334	20.4	10.0	3.9	18.2	57.5	15.4	20.1	0.0	19.5	41.4	2.5	41.1	0.0	30.0	20.1

Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cape Coral MSA	13	80,172,704	72.2	34,940	19.3	7.7	4.6	19.0	23.1	16.1	20.8	0.0	21.7	40.9	0.0	42.7	0.0	69.2	14.9
Crestview MSA	5	1,731,700	27.8	10,391	19.5	0.0	5.0	18.7	60.0	19.0	21.6	20.0	23.0	40.2	0.0	32.7	0.0	20.0	20.4
Total	18	81,904,404	100.0	45,331	19.3	5.6	4.7	18.9	33.3	16.7	21.0	5.6	22.0	40.8	0.0	40.4	0.0	55.6	16.2

Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0%

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

Table Q - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Crestview MSA	29	6,396,352	100	6,287	0.0	0.0	0.0	6.1	3.4	6.5	65.7	72.4	61.7	28.2	24.1	31.7	0.0	0.0	0.0
<i>Source: 2020 & 2021 D&B Data; 2020 & 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%</i>																			

Table Q - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Crestview MSA	32	7,904,105	100	6,274	5.4	15.6	6.0	17.4	15.6	15.8	42.4	56.3	42.4	34.9	12.5	35.8	0.0	0.0	0.0
<i>Source: 2022 D&B Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																			

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

Table R - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Crestview MSA 2021	29	6,396,352	100.0	6,287	91.7	79.3	44.2	1.9	20.7	6.4	0.0
<i>Source: 2020 & 2021 D&B Data; 2020 & 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Crestview MSA	32	7,904,105	100.0	6,274	92.4	71.9	50.9	1.6	28.1	6.0	0.0
<i>Source: 2022 D&B Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

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

State of Illinois

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Chicago MSA	199	34,972,248	99.0	138,703	11.7	23.6	9.0	32.1	75.9	26.0	28.8	0.5	26.6	27.1	0.0	38.1	0.3	0.0	0.3
IL Non-MSA	2	197,100	1.0	1,477	0.0	0.0	0.0	12.1	50.0	10.7	51.3	50.0	48.3	36.6	0.0	41.0	0.0	0.0	0.0
Total	201	35,169,348	100.0	140,180	11.4	23.4	8.9	31.6	75.6	25.8	29.4	1.0	26.8	27.4	0.0	38.1	0.3	0.0	0.3

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

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

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% 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	
Chicago MSA	54	10,055,480.00	98.2	73,179	11.4	29.6	10.8	29.5	40.7	26.1	30.9	27.8	28.7	27.8	0.0	33.8	0.5	1.9	0.6	
IL Non MSA	1	29,500.00	1.8	900	0.0	0.0	0.0	10.6	0.0	12.8	52.5	100.0	53.1	36.9	0.0	34.1	0.0	0.0	0.0	
Total	55	10,084,980.00	100.0	74,079	11.1	29.1	10.7	29.0	40.0	26.0	31.4	29.1	29.0	28.0	0.0	33.8	0.5	1.8	0.6	

Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Chicago MSA	199	34,972,248.33	99.0	138,703	34.0	21.1	5.9	17.9	68.3	15.3	16.7	5.5	20.5	31.3	2.0	40.4	0.0	3.0	17.8	
IL Non-MSA	2	197,100.00	1.0	1,477	19.3	50.0	8.2	17.6	0.0	18.3	21.7	50.0	21.2	41.4	0.0	34.8	0.0	0.0	17.5	
Total	201	35,169,348.33	100.0	140,180	33.7	21.4	6.0	17.9	67.7	15.3	16.8	6.0	20.5	31.5	2.0	40.4	0.0	3.0	17.8	

Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

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

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago MSA	54	10,055,480.00	98.2	73,179	32.4	33.3	10.4	17.4	59.3	20.9	17.1	0.0	18.9	33.1	0.0	29.9	0.0	7.4	19.9
IL Non MSA	1	29,500.00	1.8	900	19.8	100.0	11.4	17.1	0.0	21.4	21.4	0.0	23.0	41.7	0.0	29.0	0.0	0.0	15.1
Total	55	10,084,980.00	100.0	74,079	32.2	34.5	10.4	17.4	58.2	20.9	17.2	0.0	18.9	33.3	0.0	29.9	0.0	7.3	19.8

Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

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

State of Indiana

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% 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	
Evansville MSA	104	20,204,464.50	61.5	15,174	6.0	2.9	3.6	12.4	41.3	11.8	43.9	26.9	41.1	37.6	28.8	43.4	0.1	0.0	0.1	
In Non-MSA	2	355,000.00	1.2	1,566	0.0	0.0	0.0	0.0	0.0	0.0	74.4	0.0	67.4	25.6	100.0	32.6	0.0	0.0	0.0	
Carmel MSA	63	158,357,233.41	37.3	31,735	0.0	0.0	0.0	1.5	4.8	1.4	11.5	19.0	10.2	87.0	76.2	88.4	0.0	0.0	0.0	
Total	169	178,916,697.91	100.0	48,475	2.6	1.8	1.1	6.2	27.2	4.6	29.5	23.7	21.7	61.7	47.3	72.5	0.0	0.0	0.0	

Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

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

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% 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	
Evansville MSA	31	4,592,204.00	50.8	9,618	5.5	0.0	4.8	18.1	32.3	19.0	39.3	41.9	35.2	36.9	25.8	40.9	0.2	0.0	0.1	
In Non-MSA	1	676,000.00	1.6	1,002	0.0	0.0	0.0	9.5	0.0	12.4	76.4	0.0	74.3	14.0	100.0	13.4	0.0	0.0	0.0	
Carmel MSA	29	457,065,024.50	47.5	17,200	0.0	0.0	0.0	0.0	0.0	0.0	27.5	62.1	31.2	72.5	37.9	68.8	0.0	0.0	0.0	
Total	61	462,333,228.50	100.0	27,820	2.3	0.0	1.7	8.2	16.4	7.0	35.3	50.8	34.2	54.0	32.8	57.1	0.1	0.0	0.0	

Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

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

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Evansville MSA	104	20,204,464.50	61.5	15,174	20.6	16.3	11.6	17.4	19.2	20.4	20.5	8.7	19.9	41.6	45.2	23.7	0.0	10.6	24.3
In Non-MSA	2	355,000.00	1.2	1,566	15.2	0.0	5.1	18.8	0.0	21.1	21.1	0.0	23.2	44.8	50.0	30.8	0.0	50.0	19.7
Carmel MSA	63	158,357,233.41	37.3	31,735	8.6	19.0	3.1	11.1	54.0	10.7	15.9	3.2	18.4	64.3	7.9	53.2	0.0	15.9	14.5
Total	169	178,916,697.91	100.0	48,475	14.3	17.2	5.8	14.3	32.0	14.1	18.2	6.5	19.0	53.3	31.4	43.3	0.0	13.0	17.8

Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Evansville MSA	31	4,592,204.00	50.8	9,618	20.5	32.3	12.1	17.6	6.5	21.6	20.8	9.7	20.6	41.2	41.9	24.6	0.0	9.7	21.0
In Non-MSA	1	676,000.00	1.6	1,002	16.7	0.0	9.0	20.8	0.0	26.2	20.6	0.0	23.8	41.9	0.0	24.9	0.0	100.0	16.2
Carmel MSA	29	457,065,024.50	47.5	17,200	9.0	20.7	3.6	12.4	6.9	12.5	18.8	0.0	20.6	59.8	3.4	51.3	0.0	69.0	12.1
Total	61	462,333,228.50	100.0	27,820	14.1	26.2	6.7	15.0	6.6	16.1	19.7	4.9	20.7	51.2	23.0	41.1	0.0	39.3	15.3

Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

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

Table Q - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2020-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Evansville MSA	93	7,992,424	72.1	4,632	8.2	1.1	8.1	18.6	7.5	19.4	35.6	53.8	34.6	33.0	31.2	34.3	4.6	6.5	3.7		
Carmel MSA	36	5,470,067	27.9	10,560	0.0	0.0	0.0	5.2	0.0	4.9	8.1	2.8	9.1	86.6	97.2	86.0	0.0	0.0	0.0		

Source: 2020 & 2021 D&B Data; 2020 & 2021 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													2020-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM			Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans			
Evansville MSA	93	7,992,424	72.1	4,632	84.1	16.1	46.4	5.0	8.6	10.9	75.3			
Carmel MSA	36	5,470,067	27.9	10,560	90.9	22.2	48.4	3.1	11.1	5.9	66.7			

Source: 2020 & 2021 D&B Data; 2020 & 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

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

U.S. Virgin Islands

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
St. Croix AA	60	26,578,140	100.0	37	2.0	0.0	2.7	24.8	35.0	24.3	46.0	15.0	29.7	27.2	50.0	43.2	0.0	0.0	0.0

Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
St. Croix AA	14	7,573,850	100.0	18	0.0	0.0	--	28.8	14.3	--	46.5	35.7	--	24.7	50.0	--	0.0	0.0	--

Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

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

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
St. Croix AA	60	26,587,140	0.0	37	--	0.0	0.0	--	5.0	2.7	--	15.0	10.8	--	71.7	86.5	--	8.3	0.0
<i>Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																			

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
St. Croix AA	14	7,573,850	100.0	18	--	0.0	0.0	--	0.0	11.1	--	7.1	16.7	--	71.4	55.6	--	21.4	16.7
<i>Source: 2020 ACS; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																			

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

Table Q - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2020-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
St. Croix AA	89	13,908,280	100.0	395	0.0	0.0	0.5	86.5	28.1	51.6	5.3	14.6	31.4	0.0	57.3	13.7	8.2	0.0	2.8	
<i>Source: 2020 & 2021 D&B Data; 2020 & 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%</i>																				

Table Q - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
St. Croix AA	25	7,015,675	100.0	325	--	0.0	0.0	--	56.0	52.3	--	36.0	24.9	--	8.0	20.0	--	0.0	2.8	
<i>Source: 2022 D&B Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

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

Table R - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
St. Croix AA	89	13,908,280	100.0	395	79.8	23.6	23.3	8.2	10.1	12.0	66.3
<i>Source: 2020 & 2021 D&B Data; 2020 & 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
St. Croix AA	25	7,015,675	100.0	325	66.4	60.0	34.5	16.3	36.0	17.3	4.0
<i>Source: 2022 D&B Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

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