



Community Reinvestment Act (CRA)  
Public File

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## **1.1 Written Comments from the Public and Bank Responses**

### ***Current Year and Preceding Two Calendar Years***

There were no written comments or complaints delivered to the FDIC or Community First Bank of Indiana regarding financial services offered to the public in the current year or the preceding two calendar years.

## 1.2 CRA Performance Evaluation

### PUBLIC DISCLOSURE

June 22, 2022

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community First Bank of Indiana  
Certificate Number: 57511

201 West Sycamore Street  
Kokomo, Indiana 46901

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Chicago Regional Office

300 South Riverside Plaza, Suite 1700  
Chicago, Illinois 60606

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

### INSTITUTION RATING

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

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

### The Lending Test is rated Satisfactory.

The following support Community First Bank of Indiana's (CFB) satisfactory Community Reinvestment Act (CRA) performance under the Lending Test:

- The loan-to-deposit (LTD) ratio is more than reasonable given the institution's size, financial condition, and assessment area (AA) credit needs.
- A majority of loans are in the institution's AAs.
- The geographic distribution of loans reflects reasonable dispersion throughout the AAs.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the CRA rating.

### The Community Development Test is rated Satisfactory.

- The institution's community development performance demonstrates adequate responsiveness to the community development needs in its AAs through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's AAs.

## DESCRIPTION OF INSTITUTION

CFB is headquartered in Kokomo, Indiana (Howard County) and operates in the central portion of Indiana. It is a wholly-owned subsidiary of Community First Financial Corporation, a single bank holding company also based in Kokomo, Indiana. The institution received a Satisfactory rating at its previous FDIC Performance Evaluation dated April 29, 2019, based on the Interagency Small Institution CRA Examination Procedures. This is the first evaluation under the Interagency Intermediate Small Institution Examination Procedures.

CFB operates seven branch locations (including the main office) within Howard, Hamilton, and Marion Counties. A breakdown of the branches within each of the bank's two AAs is included within the description of each AA. CFB opened two new branch locations during the evaluation period. In August 2019, the bank opened a branch located in an upper-income census tract in Hamilton County. In February 2022, the bank opened a branch located in an upper-income census tract in Marion County. The Marion County branch is located 0.2 miles from the county line with Hamilton County. The bank has not closed any branches and there has been no merger or acquisition activity since the previous evaluation.

In December 2020, CFB acquired a controlling interest in First Signature Lending (FSL), LLC, which provides single-close, construction to permanent financing to consumers throughout 14 states, including Indiana. The entity is run completely independent of the bank and FSL continues to report its own HMDA LAR. Because of this, examiners did not consider FSL’s loan activity in the evaluation.

During the review period, CFB participated in the Small Business Administration’s Paycheck Protection Program (PPP), which provided loans to businesses during the COVID-19 Pandemic to cover wages and other operating expenses. The bank originated 631 PPP loans totaling \$34.5 million in 2020 and 523 PPP loans totaling \$46.7 million in 2021.

CFB experienced significant growth since the prior evaluation due to loan growth, primarily within commercial real estate and commercial lending, and branch expansion. According to the Call Report dated March 31, 2022, the bank had total assets of \$575.6 million with total loans of \$435.9 million, representing increases of 100.8 percent and 97.9 percent, respectively, since prior evaluation data as of December 31, 2018. The bank also had an increase in total deposits since the prior evaluation, rising 86.4 percent to \$474.7 million currently.

The institution offers loan products including residential home mortgage, consumer, agricultural, and business loans. Additionally, the institution provides a variety of deposit services including checking, savings, and certificates of deposit. Alternative banking services include internet banking and mobile banking.

The bank’s loan portfolio is largely comprised of commercial lending. The following table details the distribution of the bank’s loan portfolio as of March 31, 2022.

| <b>Loan Portfolio Distribution as of 3/31/2022</b>        |                 |               |
|---|-----------------|---------------|
| <b>Loan Category</b>                                      | <b>\$(000s)</b> | <b>%</b>      |
| Construction, Land Development, and Other Land Loans      | 94,498          | 21.7%         |
| Secured by Farmland                                       | 2,983           | 0.7%          |
| Secured by 1-4 Family Residential Properties              | 77,291          | 17.7%         |
| Secured by Multifamily (5 or more) Residential Properties | 7,042           | 1.6%          |
| Secured by Nonfarm Nonresidential Properties              | 160,889         | 36.9%         |
| <b>Total Real Estate Loans</b>                            | <b>342,703</b>  | <b>78.6%</b>  |
| Commercial and Industrial Loans                           | 83,847          | 19.2%         |
| Agricultural Production and Other Loans to Farmers        | 3,065           | 0.7%          |
| Consumer Loans  | 2,713           | 0.6%          |
| Other Loans   | 3,534           | 0.8%          |
| <b>Total Loans</b>  | <b>435,862</b>  | <b>100.0%</b> |
| <i>Source: Reports of Condition and Income</i>            |                 |               |

There are no financial, legal, or other impediments that would limit the institution’s ability to meet the credit needs of its AAs.

## DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more AAs within which examiners evaluate its CRA performance. CFB has designated two AAs – the Kokomo, Indiana Metropolitan Statistical Area (Kokomo MSA) and the Indianapolis-Carmel-Anderson, Indiana MSA (Indianapolis MSA).

The main office is located in the Kokomo MSA AA which includes all of Howard County. Howard County encompasses the entire MSA. The Indianapolis MSA AA includes all of Hamilton County and all of Marion County, where the City of Indianapolis is located. Marion County is new to the AA since the previous evaluation as it was added when CFB opened a branch location in the county in February 2022. The bank’s AAs conform to the CRA regulation and do not arbitrarily exclude any low- or moderate-income census tracts.

## SCOPE OF EVALUATION

### General Information

This evaluation covers the period from the prior evaluation dated April 29, 2019, to the current evaluation dated June 22, 2022. Examiners used the Intermediate Small Institution CRA Evaluation Procedures to evaluate CFB’s CRA performance. The procedures include the Lending Test and the Community Development Test. Performance criteria for each of these tests are contained in the first Appendix. Banks must achieve a rating of at least “Satisfactory” under each test to obtain an overall “Satisfactory” rating.

Examiners conducted full-scope reviews of both AAs. The Kokomo MSA AA contributed more weight to the overall conclusions given the greater amount of loans and deposits in that AA, as detailed in the following table. The table does not include 2022 data and therefore does not include the branch opened in Marion County in February 2022.

| Assessment Area Breakdown of Loans, Deposits, and Branches |                |              |                |              |          |              |
|--|----------------|--------------|----------------|--------------|----------|--------------|
| Assessment Area  | Loans*         |              | Deposits       |              | Branches |              |
|  | \$(000s)       | %            | \$(000s)       | %            | #        | %            |
| Kokomo MSA   | 109,815        | 58.4         | 359,118        | 83.3         | 3        | 50.0         |
| Indianapolis MSA   | 78,266         | 41.6         | 71,792         | 16.7         | 3        | 50.0         |
| <b>Total</b>   | <b>188,081</b> | <b>100.0</b> | <b>430,910</b> | <b>100.0</b> | <b>6</b> | <b>100.0</b> |

*Source: Bank Records, FDIC Summary of Deposits (6/30/2021). \*Loans include 2020-2021 small business and 2019-2021 home mortgage loans.*

### Activities Reviewed

As reflected in the Call Report dated March 31, 2022, the loan portfolio is primarily comprised of commercial and residential loans. Examiners reviewed small business and home mortgage loans for this evaluation, as the products are the bank’s primary lending focus. This conclusion considered

the number and dollar volume of loans originated during the evaluation period, the composition of the bank's loan portfolio, and the bank's business strategy. Examiners did not consider small farm or consumer loans, as they are not major product lines and did not represent a significant portion of the bank's originations or loan portfolio during the evaluation period. No other product represented a significant portion of the bank's loan portfolio.

Examiners analyzed the full universe of small business loans originated from January 1, 2020, through December 31, 2021, for evaluation under the AA Concentration and Geographic Distribution criteria, based on bank records. During this period, CFB originated 1,531 small business loans totaling \$148.0 million, including 1,054 loans totaling \$58.1 million originated under the Small Business Administration's PPP.

For evaluation under the Borrower Distribution criterion, examiners analyzed samples of the institution's small business loans originated from January 1, 2020, through December 31, 2021. Examiners used a 90 percent confidence interval and a 5 percent precision level. For 2020, examiners sampled 213 small business loans totaling \$19.1 million and for 2021 they sampled 213 small business loans totaling \$25.0 million. This sample was considered representative of CFB's performance during the evaluation period.

Examiners also considered all home mortgage loans reported on the bank's 2019, 2020, and 2021 Home Mortgage Disclosure Act (HMDA) Loan Application Registers. CFB originated 174 loans totaling \$30.7 million in 2019, 320 loans totaling \$61.4 million in 2020, and 296 loans totaling \$65.4 million in 2021.

Because Marion County was not part of the bank's AA for loans reviewed in 2019, 2020, or 2021, the Lending Test will only evaluate lending in Hamilton County when analyzing performance in the Indianapolis MSA AA.

Throughout this evaluation, examiners used 2015 American Community Survey (ACS) Census Data, D&B data, and aggregate HMDA data to evaluate the bank's performance. For home mortgage lending, examiners compared the bank's lending to both demographic data and aggregate HMDA data but focused on the aggregate HMDA data, as it is a better indicator of market demand. For small business lending, examiners compared the bank's performance to demographic data.

The bank's record of originating small business loans contributed more weight to the overall conclusions as this loan product had the largest volume of loan originations by number and dollar volume. Home mortgage loans are second in weight as this product's origination volume (by number and dollar) was less than small business loan originations but still represented a sizeable origination volume for the evaluation period.

For the Lending Test, examiners reviewed the number and dollar volume of small business and home mortgage loans. Examiners generally focused on the performance by number of loans as this is a better indicator of the number of individuals and businesses served.

For the Community Development Test, bank management provided data on community development loans, qualified investments, and community development services since the prior



CRA evaluation. Marion County is included for the entirety of the review period for the Community Development Test.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

CFB demonstrated satisfactory performance under the Lending Test. The bank’s performance under each Lending Test criterion supports the overall satisfactory conclusion.

#### Loan-to-Deposit Ratio

The LTD ratio is more than reasonable given the institution’s size, financial condition, and AA credit needs. The bank’s LTD ratio, calculated from Call Report data, averaged 94.8 percent over the past 12 calendar quarters from June 30, 2019, through March 31, 2022. The ratio remained generally stable for the evaluation period.

Examiners evaluated CFB’s LTD ratio by comparing it to the ratios of two similarly situated institutions (SSI). Examiners selected these institutions based on asset size, geographic location, and lending focus. As shown in the following table, CFB’s LTD ratio was higher than the ratios of the SSIs, reflecting more than reasonable performance.

| <b>Loan-to-Deposit (LTD) Ratio Comparison</b>                              |  |  |
|--|--|--|
| <b>Bank</b>  | <b>Total Assets as of<br/>3/31/2022<br/>(\$000s)</b> | <b>Average Net<br/>LTD Ratio<br/>(%)</b> |
| <b>Community First Bank of Indiana</b>                                     | <b>575,560</b>                                       | <b>94.8</b>                              |
| Similarly-Situated Institution #1  | 685,629  | 82.5                                     |
| Similarly-Situated Institution #2  | 544,482  | 80.0                                     |
| <i>Source: Reports of Condition and Income 6/30/2019 through 3/31/2022</i> |  |  |

#### Assessment Area Concentration

CFB originated a majority of its small business and home mortgage loans by number and dollar volume within the AAs during the evaluation period. The following table illustrates the bank’s performance in each year reviewed.

| Lending Inside and Outside of the Assessment Area    |                 |             |            |             |              |                                  |             |                |             |                |
|--|-----------------|-------------|------------|-------------|--------------|----------------------------------|-------------|----------------|-------------|----------------|
| Loan Category  | Number of Loans |             |            |             | Total #      | Dollars Amount of Loans \$(000s) |             |                |             | Total \$(000s) |
|  | Inside          |             | Outside    |             |              | Inside                           |             | Outside        |             |                |
|  | #               | %           | #          | %           |              | \$                               | %           | \$             | %           |                |
| Small Business                                       |                 |             |            |             |              |                                  |             |                |             |                |
| 2020   | 528             | 64.3        | 293        | 35.7        | 821          | 42,818                           | 59.1        | 29,592         | 40.9        | 72,410         |
| 2021   | 426             | 60.0        | 284        | 40.0        | 710          | 46,483                           | 61.5        | 29,132         | 38.5        | 75,615         |
| <b>Subtotal</b>                                      | <b>954</b>      | <b>62.3</b> | <b>577</b> | <b>37.7</b> | <b>1,531</b> | <b>89,301</b>                    | <b>60.3</b> | <b>58,724</b>  | <b>39.7</b> | <b>148,025</b> |
| Home Mortgage  |                 |             |            |             |              |                                  |             |                |             |                |
| 2019   | 123             | 70.7        | 51         | 29.3        | 174          | 19,836                           | 64.6        | 10,871         | 35.4        | 30,707         |
| 2020   | 234             | 73.1        | 86         | 26.9        | 320          | 41,132                           | 66.9        | 20,316         | 33.1        | 61,448         |
| 2021   | 188             | 63.5        | 108        | 36.5        | 296          | 37,811                           | 57.8        | 27,624         | 42.2        | 65,435         |
| <b>Subtotal</b>                                      | <b>545</b>      | <b>69.0</b> | <b>245</b> | <b>31.0</b> | <b>790</b>   | <b>98,779</b>                    | <b>62.7</b> | <b>58,811</b>  | <b>37.3</b> | <b>157,590</b> |
| <b>Total</b>   | <b>1,499</b>    | <b>64.6</b> | <b>822</b> | <b>35.4</b> | <b>2,321</b> | <b>188,080</b>                   | <b>61.5</b> | <b>117,535</b> | <b>38.5</b> | <b>305,615</b> |
| <i>Source: HMDA Reported Data; CRA Reported Data</i> |                 |             |            |             |              |                                  |             |                |             |                |

### Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AAs. Performance is reasonable throughout the AAs for both small business and home mortgage lending. Refer to the separate AA discussions for further detail regarding the institution's performance under this criterion.

### Borrower Profile

The distribution of borrowers reflects, given the demographics of the AAs, reasonable penetration among individuals of different income levels and businesses of different sizes. Performance is reasonable throughout the AAs for both small business and home mortgage lending. Refer to the separate AA discussions for further detail regarding the institution's performance under this criterion.

### Response to Complaints

The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test Rating.

## COMMUNITY DEVELOPMENT TEST

CFB demonstrated adequate responsiveness to the community development needs of its AAs through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities. As noted previously, this is CFB's first evaluation under the Community Development Test.

CFB's community development performance was evaluated for all three counties that comprise its overall AA. Most of the community development lending activity occurred in the Indianapolis MSA, with much of it related to PPP loans within Marion County. Most of the investment and

services activities occurred in the Kokomo MSA. Hamilton County, within the Indianapolis MSA, is the wealthiest county in the State of Indiana. In addition, only 3.5 percent of families have incomes below the poverty level, which lags the entire state's 11.1 percent of families below the poverty level. Hamilton County has no low-income census tracts and only 2 of the 39 census tracts are moderate-income. As such, community development opportunities are limited. While the demographics of Marion County show an array of community development needs, the bank did not have a presence and only had limited involvement with organizations in the county until February 2022. Despite these challenges, CFB addressed economic development and community services needs within Hamilton and Marion Counties.

Examiners evaluated CFB's community development performance through comparisons to three SSIs who received a Satisfactory rating at their most recent CRA evaluations. The institutions have a similar lending focus and asset size, with two operating in roughly the same geographic areas as CFB. One of the institutions also transitioned to an Intermediate Small Bank during its most recent evaluation. Excluding PPP loans, CFB's community development lending performance was below all three institutions; however, inclusion of the PPP loans brought its performance in line with the two institutions that also granted PPP loans. CFB's qualified investments consisted solely of donations and grants (like one of the SSIs) and its performance was similar to the SSIs. Its level of community development services exceeded all three SSIs. Considering these comparisons, CFB's overall Community Development Test performance is adequate. The levels of activities are presented below and are further discussed within each AA.

### Community Development Loans

During the evaluation period, CFB originated 103 community development loans totaling approximately \$17.3 million. This level of activity represents 3.0 percent of total assets and 4.0 percent of net loans as of March 31, 2022.

In early 2020, Congress created the PPP to assist businesses during the COVID-19 pandemic. CFB actively participated in the program extending 99 loans totaling \$16.4 million of its community development loans under the program. Those loans promoted job retention for low- and moderate- income persons and/or benefited low- and moderate-income geographies. Two of the PPP loans benefited a broader regional area that included CFB's AAs. Both loans retained jobs for low- and moderate-income persons. One provided the elderly population with medical care, and the other was to a borrower with a chain of grocery stores that serves the low- and moderate-income populations and geographies in counties adjacent to the AAs.

Excluding the PPP loans, the bank extended four community development loans totaling

\$913,700, representing 0.2 percent of total assets and 0.2 percent of net loans. These non-PPP loans financed new businesses in low- and moderate-income areas and created jobs for low- and moderate-income persons. Examiners compared CFB's performance to three SSIs. The following comparisons are based on the non-PPP loans only as one SSI did not have any PPP activity. The community development loans to total assets ratios of the SSIs ranged from a low of 0.8 percent to a high of 2.3 percent. CFB's ratio of 0.2 percent was below all three. The SSIs community development loans to net loans ratios ranged from a low of 1.0 percent to a high of 4.8 percent. CFB's ratio of 0.2 percent, again, was below all three.

An additional comparison was made to the SSIs including the PPP loans. The community development loans to total assets ratios of the two SSIs with PPP loans ranged from a low of 1.9 percent to a high of 2.6 percent. CFB's ratio of 3.0 percent exceeded both. The SSIs community development loans to net loans ratios ranged from a low of 2.6 percent to a high of 5.4 percent.

CFB's ratio of 4.0 percent fell between the two.

As shown in the following tables, community development loans facilitated community services, economic development, and revitalization/stabilization. These loans demonstrated CFB's responsiveness to community development needs identified throughout the AAs.

| Community Development Lending by Assessment Area - Overall |                    |          |                    |          |                      |              |                         |               |            |               |
|--|--------------------|----------|--------------------|----------|----------------------|--------------|-------------------------|---------------|------------|---------------|
| Assessment Area  | Affordable Housing |          | Community Services |          | Economic Development |              | Revitalize or Stabilize |               | Totals     |               |
|  | #                  | \$(000s) | #                  | \$(000s) | #                    | \$(000s)     | #                       | \$(000s)      | #          | \$(000s)      |
| Kokomo MSA   | 0                  | 0        | 0                  | 0        | 1                    | 556          | 2                       | 3,114         | 3          | 3,670         |
| Indianapolis MSA   | 0                  | 0        | 0                  | 0        | 30                   | 3,036        | 68                      | 8,856         | 98         | 11,892        |
| Regional Activities  | 0                  | 0        | 0                  | 0        | 1                    | 990          | 1                       | 769           | 2          | 1,759         |
| <b>Total</b>   | <b>0</b>           | <b>0</b> | <b>0</b>           | <b>0</b> | <b>32</b>            | <b>4,582</b> | <b>71</b>               | <b>12,739</b> | <b>103</b> | <b>17,321</b> |

*Source: Bank Data*

| Community Development Lending - Overall |                    |          |                    |          |                      |              |                         |               |            |               |
|---|--------------------|----------|--------------------|----------|----------------------|--------------|-------------------------|---------------|------------|---------------|
| Activity Year                           | Affordable Housing |          | Community Services |          | Economic Development |              | Revitalize or Stabilize |               | Totals     |               |
|   | #                  | \$(000s) | #                  | \$(000s) | #                    | \$(000s)     | #                       | \$(000s)      | #          | \$(000s)      |
| 2019                                    | 0                  | 0        | 0                  | 0        | 1                    | 556          | 0                       | 0             | 1          | 556           |
| 2020                                    | 0                  | 0        | 0                  | 0        | 17                   | 2,433        | 34                      | 9,105         | 51         | 11,538        |
| 2021                                    | 0                  | 0        | 0                  | 0        | 14                   | 1,593        | 37                      | 3,634         | 51         | 5,227         |
| YTD 2022                                | 0                  | 0        | 0                  | 0        | 0                    | 0            | 0                       | 0             | 0          | 0             |
| <b>Total</b>                            | <b>0</b>           | <b>0</b> | <b>0</b>           | <b>0</b> | <b>32</b>            | <b>4,582</b> | <b>71</b>               | <b>12,739</b> | <b>103</b> | <b>17,321</b> |

*Source: Bank Data; Review period 04/29/2019 to 06/22/2022*

## Qualified Investments

CFB made no qualifying investments during or prior to the evaluation period. Its 31 qualified donations and grants totaled \$88,736 and responded to affordable housing and

community service needs throughout its AAs. CFB’s qualified investments (synonymous with donations and grants hereafter) to total securities ratio of 2.1 percent exceeded all three SSIs whose ratios were all below

0.1 percent. CFB’s qualified investments to total assets ratio of less than 0.1 percent nearly mirrored two of SSIs and was below the third whose ratio was 1.5 percent. The SSIs ranged from 22 to 43 qualified investments with totals ranging from \$86,150 to \$3.8 million. The following table illustrates CFB’s donations.

| Qualified Investments - Overall |                    |          |                    |           |                      |          |                         |          |           |           |
|---------------------------------|--------------------|----------|--------------------|-----------|----------------------|----------|-------------------------|----------|-----------|-----------|
| Activity Year                   | Affordable Housing |          | Community Services |           | Economic Development |          | Revitalize or Stabilize |          | Totals    |           |
|                                 | #                  | \$(000s) | #                  | \$(000s)  | #                    | \$(000s) | #                       | \$(000s) | #         | \$(000s)  |
| Qualified Grants & Donations    | 2                  | 2        | 29                 | 87        | 0                    | 0        | 0                       | 0        | 31        | 89        |
| <b>Total</b>                    | <b>2</b>           | <b>2</b> | <b>29</b>          | <b>87</b> | <b>0</b>             | <b>0</b> | <b>0</b>                | <b>0</b> | <b>31</b> | <b>89</b> |

*Source: Bank Data; Review period 04/29/2019 to 06/22/2022*

### Community Development Services

During the evaluation period, 21 bank directors and employees provided 67 instances of financial expertise and technical assistance to 20 community development organizations throughout the AAs. Services included providing technical and financial expertise to youth in a specialized education program and serving on committees and boards of community development-related organizations. Bank representatives performed the qualified activities during this review period on an ongoing basis.

CFB’s level of community development services performance far exceeded the three SSIs that provided instances of services ranging from 26 to 32. The following table details the community development services by year and community development category.

| Community Development Services - Overall |                    |                    |                      |                         |           |
|--|--------------------|--------------------|----------------------|-------------------------|-----------|
| Activity Year                            | Affordable Housing | Community Services | Economic Development | Revitalize or Stabilize | Totals    |
|  | #                  | #                  | #                    | #                       | #         |
| 2019                                     | 1                  | 19                 | 3                    | 0                       | 23        |
| 2020                                     | 2                  | 19                 | 8                    | 0                       | 29        |
| 2021                                     | 0                  | 6                  | 1                    | 0                       | 7         |
| YTD 2022                                 | 0                  | 7                  | 1                    | 0                       | 8         |
| <b>Total</b>                             | <b>3</b>           | <b>51</b>          | <b>13</b>            | <b>0</b>                | <b>67</b> |

*Source: Bank Data; Review period 04/29/2019 to 06/22/2022*

The bank operates two of its seven offices and corresponding ATMs (29 percent) in low- and moderate-income census tracts in the AA. CFB also offers several consumer and business checking accounts with no minimum balance requirements or service charges. The location of the branches and ATMs as well as no-cost product offerings demonstrates the availability of banking services to low- and moderate-income individuals. Finally, the bank

maintains 24 Interest on Lawyers Trust Accounts totaling \$3.8 million. Interest earned on these accounts helps pay for legal services for low- and moderate-income individuals.

## DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank’s compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution’s overall CRA rating.

### KOKOMO, IN MSA AA – Full-Scope Review

#### DESCRIPTION OF INSTITUTION’S OPERATIONS IN KOKOMO MSA AA

The Kokomo, IN MSA AA includes the entirety of Howard County, which comprises the entire MSA. CFB operates its main office and two branches in the Kokomo MSA AA. The main office is located in a moderate-income tract, one branch is located in a low-income tract, and one branch is located in an upper-income tract.

#### Economic and Demographic Data

The AA contains 20 census tracts. According to 2015 ACS data, these tracts reflect the following income designations:

- 2 low-income tracts
- 4 moderate-income tracts
- 9 middle-income tracts
- 5 upper-income tracts

The low- and moderate-income census tracts are generally located in and around the city of Kokomo in Howard County. The following table illustrates select economic and demographic characteristics of the AA.

| Demographic Information of the Assessment Area |   |               |                    |                  |                 |               |
|--|---|---------------|--------------------|------------------|-----------------|---------------|
| Assessment Area: Kokomo MSA                    |   |               |                    |                  |                 |               |
| Demographic Characteristics                    | # | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
|  |   |               |                    |                  |                 |               |

|  |          |                              |      |      |          |     |
|--|----------|------------------------------|------|------|----------|-----|
| Geographies (Census Tracts)  | 20       | 10.0                         | 20.0 | 45.0 | 25.0     | 0.0 |
| Population by Geography  | 82,765   | 8.7                          | 16.7 | 46.6 | 28.0     | 0.0 |
| Housing Units by Geography   | 38,649   | 10.0                         | 19.0 | 46.2 | 24.9     | 0.0 |
| Owner-Occupied Units by Geography  | 23,731   | 6.3                          | 14.2 | 48.7 | 30.8     | 0.0 |
| Occupied Rental Units by Geography   | 10,682   | 16.4                         | 23.0 | 45.2 | 15.4     | 0.0 |
| Vacant Units by Geography  | 4,236    | 14.6                         | 35.3 | 34.3 | 15.8     | 0.0 |
| Businesses by Geography  | 5,975    | 10.6                         | 18.9 | 45.7 | 24.8     | 0.0 |
| Farms by Geography   | 328      | 3.4                          | 6.4  | 45.1 | 45.1     | 0.0 |
| Family Distribution by Income Level  | 22,281   | 22.2                         | 16.6 | 21.1 | 40.0     | 0.0 |
| Household Distribution by Income Level   | 34,413   | 24.3                         | 16.6 | 16.2 | 42.8     | 0.0 |
| Median Family Income MSA - 29020<br>Kokomo, IN MSA   | \$59,111 | Median Housing Value         |      |      | \$95,275 |     |
|  |          | Median Gross Rent            |      |      | \$634    |     |
|  |          | Families Below Poverty Level |      |      | 13.3%    |     |
| <i>Source: 2015 ACS and 2021 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                              |      |      |          |     |

Within the AA, service industries comprise the largest portion of businesses (37.9 percent); followed by non-classifiable establishments (18.4 percent); retail trade (13.6 percent); and finance, insurance, and real estate (9.8 percent). Approximately 62.4 percent of area businesses have four or fewer employees, and 88.6 percent operate from a single location. Major employers in the AA include Chrysler Indiana Transmission, UAW, Community Regional Health, and Haynes International.

Data obtained from the U.S. Bureau of Labor Statistics indicates that the 2019 year-end unemployment rate was 4.0 percent in Howard County. Throughout 2020 and the onset of the COVID-19 Pandemic, unemployment levels in the county, the state, and the country increased substantially before beginning to retract in 2021. Unemployment levels in the AA remained higher than both the state and national averages throughout the review period. The following table illustrates unemployment rates according to the U.S. Bureau of Labor and Statistics.

| Unemployment Rates                        |      |      |      |
|---|------|------|------|
| Area                                      | 2019 | 2020 | 2021 |
|   | %    | %    | %    |
| Howard County                             | 4.0  | 11.0 | 6.2  |
| State                                     | 3.3  | 7.2  | 3.6  |
| National Average                          | 3.7  | 8.1  | 5.3  |
| <i>Source: Bureau of Labor Statistics</i> |      |      |      |

Examiners use the FFIEC-adjusted median family income levels to analyze home mortgage lending performance under the Borrower Profile criterion. The following table contains these figures for 2019, 2020, and 2021.

| Median Family Income Ranges                        |             |                         |                        |                |
|--|-------------|-------------------------|------------------------|----------------|
| Median Family Incomes                              | Low<br><50% | Moderate<br>50% to <80% | Middle<br>80% to <120% | Upper<br>≥120% |
| <b>Kokomo, IN MSA Median Family Income (29020)</b> |             |                         |                        |                |
| 2019 (\$65,200)                                    | <\$32,600   | \$32,600 to <\$52,160   | \$52,160 to <\$78,240  | ≥\$78,240      |
| 2020 (\$63,900)                                    | <\$31,950   | \$31,950 to <\$51,120   | \$51,120 to <\$76,680  | ≥\$76,680      |
| 2021 (\$69,800)                                    | <\$34,900   | \$34,900 to <\$55,840   | \$55,840 to <\$83,760  | ≥\$83,760      |
| <i>Source: FFIEC</i>                               |             |                         |                        |                |

## Competition

The AA is a moderately competitive market for financial services. According to FDIC Deposit Market Share data as of June 30, 2021, 9 FDIC-insured institutions operate 23 offices in the AA. Of these institutions, CFB ranked 2<sup>nd</sup> with 23.2 percent of the deposit market share. CFB’s 3 offices account for 13.0 percent of FDIC-insured bank locations within the AA. Further competition comes from a variety of credit unions operating within the AA.

CFB is not required to report CRA small business data, but aggregate CRA data is included here to illustrate demand for that product. In 2020, 59 lenders reported 995 small business loans originations and purchases in the AA, indicating moderate competition within the AA.

There is strong competition for home mortgage loans within the AA. According to HMDA aggregate data in 2020, CFB ranked 7<sup>th</sup> out of 240 lenders, commanding 3.2 percent of the HMDA market share.

## Community Contact

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying the credit needs. This information helps determine whether local financial institutions are responsive to those needs. It also shows what credit opportunities are available. Examiners contacted a representative from a local economic development organization. The contact stated that Howard County is experiencing similar economic trends as other counties in the state, including higher than normal inflation and significant increases in utility costs. The contact stated that some of the primary credit needs in the area are affordable housing, small business lending, and real estate lending.

## Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that small business and home mortgage lending represent the primary credit needs in the AA. In addition, community development needs include affordable housing and community services for low- and moderate-income persons.



# CONCLUSIONS ON PERFORMANCE CRITERIA IN KOKOMO, IN MSA AA

## LENDING TEST

CFB demonstrated reasonable performance under the Lending Test. Geographic distribution and borrower profile support this conclusion.

### Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. The bank's reasonable performance in both small business and home mortgage lending supports the overall conclusion.

### *Small Business Loans*

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA. As shown in the following table, CFB's lending performance exceeded the percentage of businesses in low- and moderate-income tracts during 2020 and 2021.

| <b>Geographic Distribution of Small Business Loans</b><br><b>Assessment Area: Kokomo MSA</b>             |                        |            |              |                 |              |
|--|------------------------|------------|--------------|-----------------|--------------|
| <b>Tract Income Level</b>  | <b>% of Businesses</b> | <b>#</b>   | <b>%</b>     | <b>\$(000s)</b> | <b>%</b>     |
| <b>Low</b>   |                        |            |              |                 |              |
| 2020   | 11.1                   | 44         | 13.2         | 3,305           | 14.4         |
| 2021   | 10.6                   | 36         | 13.8         | 2,793           | 11.0         |
| <b>Moderate</b>  |                        |            |              |                 |              |
| 2020   | 18.5                   | 83         | 24.8         | 5,399           | 23.5         |
| 2021   | 18.9                   | 56         | 21.5         | 5,167           | 20.4         |
| <b>Middle</b>  |                        |            |              |                 |              |
| 2020   | 46.2                   | 102        | 30.5         | 8,401           | 36.6         |
| 2021   | 45.7                   | 91         | 35.0         | 11,100          | 43.9         |
| <b>Upper</b>   |                        |            |              |                 |              |
| 2020   | 24.2                   | 105        | 31.4         | 5,851           | 25.5         |
| 2021   | 24.8                   | 77         | 29.6         | 6,222           | 24.6         |
| <b>Totals</b>  |                        |            |              |                 |              |
| <b>2020</b>  | <b>100.0</b>           | <b>334</b> | <b>100.0</b> | <b>22,956</b>   | <b>100.0</b> |
| <b>2021</b>  | <b>100.0</b>           | <b>260</b> | <b>100.0</b> | <b>25,282</b>   | <b>100.0</b> |
| <i>Source: 2020 &amp; 2021 D&amp;B Data; Bank Data.<br/>Due to rounding, totals may not equal 100.0%</i> |                        |            |              |                 |              |

## Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. CFB's performance in the low-income tracts in 2019 and 2020 was slightly below the aggregate performance for those years. The bank's performance improved in 2021.

CFB's performance in the moderate-income tracts in 2019 and 2020 was slightly above the aggregate performance. Performance from 2020 to 2021 remained consistent in the moderate-income tracts.

The institution's home mortgage lending performance in low- and moderate-income tracts is reasonable. The following table details the geographic distribution of home mortgage loans.

| Geographic Distribution of Home Mortgage Loans   |                                   |                              |            |              |               |              |
|--|-----------------------------------|------------------------------|------------|--------------|---------------|--------------|
| Assessment Area: Kokomo MSA  |                                   |                              |            |              |               |              |
| Tract Income Level   | % of Owner-Occupied Housing Units | Aggregate Performance % of # | #          | %            | \$(000s)      | %            |
| Low  |                                   |                              |            |              |               |              |
| 2019   | 6.3                               | 3.7                          | 2          | 2.0          | 54            | 0.4          |
| 2020   | 6.3                               | 4.3                          | 2          | 1.2          | 56            | 0.2          |
| 2021   | 6.3                               | --                           | 5          | 3.7          | 440           | 1.9          |
| Moderate   |                                   |                              |            |              |               |              |
| 2019   | 14.2                              | 11.3                         | 17         | 16.8         | 1,284         | 9.4          |
| 2020   | 14.2                              | 7.5                          | 17         | 10.2         | 1,401         | 5.8          |
| 2021   | 14.2                              | --                           | 14         | 10.3         | 2,149         | 9.1          |
| Middle   |                                   |                              |            |              |               |              |
| 2019   | 48.7                              | 49.6                         | 33         | 32.7         | 3,948         | 28.8         |
| 2020   | 48.7                              | 48.8                         | 59         | 35.5         | 7,169         | 29.7         |
| 2021   | 48.7                              | --                           | 58         | 42.6         | 7,657         | 32.3         |
| Upper  |                                   |                              |            |              |               |              |
| 2019   | 30.8                              | 35.4                         | 49         | 48.5         | 8,429         | 61.5         |
| 2020   | 30.8                              | 39.5                         | 88         | 53.0         | 15,494        | 64.2         |
| 2021   | 30.8                              | --                           | 59         | 43.4         | 13,496        | 56.8         |
| <b>Totals</b>  |                                   |                              |            |              |               |              |
| <b>2019</b>  | <b>100.0</b>                      | <b>100.0</b>                 | <b>101</b> | <b>100.0</b> | <b>13,715</b> | <b>100.0</b> |
| <b>2020</b>  | <b>100.0</b>                      | <b>100.0</b>                 | <b>166</b> | <b>100.0</b> | <b>24,120</b> | <b>100.0</b> |
| <b>2021</b>  | <b>100.0</b>                      | <b>--</b>                    | <b>136</b> | <b>100.0</b> | <b>23,742</b> | <b>100.0</b> |
| <i>Source: 2015 ACS, Bank Data, 2019 &amp; 2020 HMDA Aggregate Data, "--" data not available.<br/>Due to rounding, totals may not equal 100.0%</i> |                                   |                              |            |              |               |              |

## Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels and businesses of different sizes. The bank's reasonable performance in both home mortgage and small business lending supports the overall conclusion.

### Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. As illustrated in the following table, CFB’s lending performance was comparable to the percentage of businesses that reported gross annual revenues of \$1.0 million or less in both years reviewed. This demonstrates its commitment to lend to small businesses.

| Distribution of Small Business Loans by Gross Annual Revenue Category                                    |                 |           |              |              |              |
|--|-----------------|-----------|--------------|--------------|--------------|
| Assessment Area: Kokomo MSA  |                 |           |              |              |              |
| Gross Revenue Level  | % of Businesses | #         | %            | \$(000s)     | %            |
| ≤\$1,000,000   |                 |           |              |              |              |
| 2020   | 82.9            | 79        | 84.9         | 2,924        | 61.8         |
| 2021   | 84.5            | 60        | 77.9         | 2,378        | 32.4         |
| >\$1,000,000   |                 |           |              |              |              |
| 2020   | 3.8             | 14        | 15.1         | 1,808        | 38.2         |
| 2021   | 3.3             | 17        | 22.1         | 4,955        | 67.6         |
| Revenue Not Available  |                 |           |              |              |              |
| 2020   | 13.3            | 0         | 0.0          | 0            | 0.0          |
| 2021   | 12.2            | 0         | 0.0          | 0            | 0.0          |
| <b>Totals</b>  |                 |           |              |              |              |
| <b>2020</b>  | <b>100.0</b>    | <b>93</b> | <b>100.0</b> | <b>4,732</b> | <b>100.0</b> |
| <b>2021</b>  | <b>100.0</b>    | <b>77</b> | <b>100.0</b> | <b>7,333</b> | <b>100.0</b> |
| <i>Source: 2020 &amp; 2021 D&amp;B Data; Bank Data.<br/>Due to rounding, totals may not equal 100.0%</i> |                 |           |              |              |              |

### Home Mortgage Loans

The distribution of home mortgage loans reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels. As shown in the following table, approximately 22.2 percent of families in the AA have low incomes. This category includes the 13.3 percent of families in the AA with incomes below the poverty level. Families at that income level may face difficulty in qualifying for and/or servicing debt in amounts necessary to finance homes in the AA. As a result, examiners focused on the comparison of the bank’s lending levels to the aggregate HMDA data, as this represents market demand from qualified, credit-worthy low- income borrowers. The bank’s lending to low-income borrowers in 2019 was slightly above the aggregate performance; however, the bank’s lending in 2020 was below the aggregate. Lending performance to low-income borrowers improved from 2020 to 2021.

Lending to moderate-income borrowers was slightly below the aggregate performance for both 2019 and 2020. However, lending to moderate-income borrowers exceeded the percentage of families for all three years. Overall, performance is reasonable.

| Distribution of Home Mortgage Loans by Borrower Income Level   |               |                              |            |              |               |              |
|--|---------------|------------------------------|------------|--------------|---------------|--------------|
| Assessment Area: Kokomo MSA  |               |                              |            |              |               |              |
| Borrower Income Level  | % of Families | Aggregate Performance % of # | #          | %            | \$(000s)      | %            |
| Low  |               |                              |            |              |               |              |
| 2019   | 22.2          | 10.8                         | 12         | 11.9         | 1,012         | 7.4          |
| 2020   | 22.2          | 8.6                          | 6          | 3.6          | 342           | 1.4          |
| 2021   | 22.2          | --                           | 12         | 8.8          | 895           | 3.8          |
| Moderate   |               |                              |            |              |               |              |
| 2019   | 16.6          | 22.8                         | 19         | 18.8         | 1,378         | 10.0         |
| 2020   | 16.6          | 21.2                         | 32         | 19.3         | 3,200         | 13.3         |
| 2021   | 16.6          | --                           | 24         | 17.6         | 2,654         | 11.2         |
| Middle   |               |                              |            |              |               |              |
| 2019   | 21.1          | 23.3                         | 16         | 15.8         | 1,519         | 11.1         |
| 2020   | 21.1          | 22.4                         | 33         | 19.9         | 3,764         | 15.6         |
| 2021   | 21.1          | --                           | 32         | 23.5         | 4,610         | 19.4         |
| Upper  |               |                              |            |              |               |              |
| 2019   | 40.0          | 25.9                         | 46         | 45.5         | 9,032         | 65.9         |
| 2020   | 40.0          | 29.1                         | 82         | 49.4         | 15,012        | 62.2         |
| 2021   | 40.0          | --                           | 54         | 39.7         | 12,037        | 50.7         |
| Not Available  |               |                              |            |              |               |              |
| 2019   | 0.0           | 17.2                         | 8          | 7.9          | 774           | 5.6          |
| 2020   | 0.0           | 18.6                         | 13         | 7.8          | 1,802         | 7.5          |
| 2021   | 0.0           | --                           | 14         | 10.3         | 3,546         | 14.9         |
| <b>Total</b>   |               |                              |            |              |               |              |
| <b>2019</b>  | <b>100.0</b>  | <b>100.0</b>                 | <b>101</b> | <b>100.0</b> | <b>13,715</b> | <b>100.0</b> |
| <b>2020</b>  | <b>100.0</b>  | <b>100.0</b>                 | <b>166</b> | <b>100.0</b> | <b>24,120</b> | <b>100.0</b> |
| <b>2021</b>  | <b>100.0</b>  | <b>--</b>                    | <b>136</b> | <b>100.0</b> | <b>23,742</b> | <b>100.0</b> |
| <i>Source: 2015 ACS; Bank Data, 2019 &amp; 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i> |               |                              |            |              |               |              |

## COMMUNITY DEVELOPMENT TEST

CFB demonstrated adequate responsiveness to the community development needs of this AA through community development loans, qualified investments, and community development services. Examiner's considered the institution's capacity and the need and availability of such opportunities.

### Community Development Loans

During the evaluation period, CFB originated three community development loans totaling approximately \$3.7 million within this AA. All of the loans were in low- or moderate-income census tracts. One financed a new eatery with a children's play center in downtown

Kokomo, thus creating new jobs. The other two retained over 300 jobs primarily for low- and moderate-income persons, with one also providing services to the developmentally disabled members of the community. The following table provides details on the community development lending in this AA.

| Community Development Lending<br>Assessment Area: Kokomo MSA |                    |          |                    |          |                      |            |                         |              |          |              |
|--|--------------------|----------|--------------------|----------|----------------------|------------|-------------------------|--------------|----------|--------------|
| Activity Year  | Affordable Housing |          | Community Services |          | Economic Development |            | Revitalize or Stabilize |              | Totals   |              |
|  | #                  | \$(000s) | #                  | \$(000s) | #                    | \$(000s)   | #                       | \$(000s)     | #        | \$(000s)     |
| 2019   | 0                  | 0        | 0                  | 0        | 1                    | 556        | 0                       | 0            | 1        | 556          |
| 2020   | 0                  | 0        | 0                  | 0        | 0                    | 0          | 2                       | 3,114        | 2        | 3,114        |
| 2021   | 0                  | 0        | 0                  | 0        | 0                    | 0          | 0                       | 0            | 0        | 0            |
| YTD 2022   | 0                  | 0        | 0                  | 0        | 0                    | 0          | 0                       | 0            | 0        | 0            |
| <b>Total</b>   | <b>0</b>           | <b>0</b> | <b>0</b>           | <b>0</b> | <b>1</b>             | <b>556</b> | <b>2</b>                | <b>3,114</b> | <b>3</b> | <b>3,670</b> |

*Source: Bank Data; Review period 04/29/2019 to 06/22/2022*

### Qualified Investments

CFB made no qualifying investments in this AA during the evaluation period; however, it made 21 qualifying donations and grants totaling \$79,456. Examples include: affordable housing for low-income persons and homeless veterans; job placement and childcare for low-income parents; scholarships for underprivileged students; and a community center with public use space at a community college located in a moderate-income census tract where 87 percent of students receive financial assistance. The following table illustrates CFB’s community development donations and grants by category.

| Qualified Investments<br>Assessment Area: Kokomo MSA |                    |          |                    |           |                      |          |                         |          |           |           |
|--|--------------------|----------|--------------------|-----------|----------------------|----------|-------------------------|----------|-----------|-----------|
| Activity Year  | Affordable Housing |          | Community Services |           | Economic Development |          | Revitalize or Stabilize |          | Totals    |           |
|  | #                  | \$(000s) | #                  | \$(000s)  | #                    | \$(000s) | #                       | \$(000s) | #         | \$(000s)  |
| Qualified Grants & Donations                         | 2                  | 2        | 19                 | 78        | 0                    | 0        | 0                       | 0        | 21        | 80        |
| <b>Total</b>   | <b>2</b>           | <b>2</b> | <b>19</b>          | <b>78</b> | <b>0</b>             | <b>0</b> | <b>0</b>                | <b>0</b> | <b>21</b> | <b>80</b> |

*Source: Bank Data; Review period 04/29/2019 to 06/22/2022*

### Community Development Services

During the evaluation period, 17 bank directors and employees provided 62 instances of financial expertise and technical assistance to 17 community development organizations serving this AA. The following table illustrates the instances of community development services by year and purpose.

| Community Development Services<br>Assessment Area: Kokomo MSA |  |  |  |  |  |  |  |  |  |  |
|---|--|--|--|--|--|--|--|--|--|--|
|---|--|--|--|--|--|--|--|--|--|--|

| Activity Year | Affordable Housing | Community Services | Economic Development | Revitalize or Stabilize | Totals    |
|---------------|--------------------|--------------------|----------------------|-------------------------|-----------|
|               | #                  | #                  | #                    | #                       | #         |
| 2019          | 1                  | 18                 | 2                    | 0                       | 21        |
| 2020          | 2                  | 17                 | 7                    | 0                       | 26        |
| 2021          | 0                  | 6                  | 1                    | 0                       | 7         |
| YTD 2022      | 0                  | 7                  | 1                    | 0                       | 8         |
| <b>Total</b>  | <b>3</b>           | <b>48</b>          | <b>11</b>            | <b>0</b>                | <b>62</b> |

*Source: Bank Data; Review period 04/29/2019 to 06/22/2022*

The following are examples of CFB’s community development services in this AA:

- A board member provides financial expertise to a rescue mission that provides shelter and basic necessities to the local homeless population, a thrift store, and back to school clothing and supplies for income-qualified students.
- Two employees provide financial expertise to an affordable housing organization that operates within Howard County.
- An employee provides financial expertise to an organization that provides very low-cost healthcare to the uninsured and low- and moderate-income population within the AA. The organization provides medical and dental services, defrays medication and durable medical equipment costs, offers health counseling, and provides significantly discounted eyeglasses and hearing aids.

## INDIANAPOLIS, IN MSA AA – Full-Scope Review DESCRIPTION OF INSTITUTION’S OPERATIONS IN INDIANAPOLIS MSA AA

The Indianapolis MSA AA includes all of Hamilton County. CFB operates three branch offices in this AA. Two offices are located in Westfield, and one office is located in Noblesville. Two of the branches are in upper-income tracts, and one is in a middle-income tract.

The information provided in this section does not include Marion County or the Indianapolis branch as it opened in February 2022, and the Lending Test focused on the bank’s performance through 2021. However, the Indianapolis MSA AA will include Marion County going forward. Marion County is comprised of 224 census tracts with the following income designations: 59 low-income; 77 moderate-income; 54 middle-income; 33 upper-income; and 1 census tract for which an income is not designated. As stated previously, the new branch is located in an upper-income tract.

## Economic and Demographic Data

The AA consists of 39 census tracts. According to 2015 ACS data, these tracts reflect the following income designations:

- 2 moderate-income tracts
- 6 middle-income tracts
- 31 upper-income tracts

There are no low-income tracts within the AA. The following table details select economic and demographic characteristics of the AA.

| Demographic Information of the Assessment Area   |         |               |                              |                  |                 |               |
|--|---------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: Indianapolis MSA  |         |               |                              |                  |                 |               |
| Demographic Characteristics  | #       | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% 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 and 2021 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |         |               |                              |                  |                 |               |

The AA is suburban and has a population of 296,635. Within the AA, services industries comprise the largest portion of businesses (37.8 percent); followed by non-classifiable establishments (26.5 percent); finance, insurance, and real estate (13.5 percent); and retail trade (7.6 percent).

Approximately 61.3 percent of area businesses have four or fewer employees, and 94.4 percent operate from a single location. Major employers in the AA include CNO Financial Group Inc., RCI LLC, Navient Corp, and Roche Diagnostics Corp.

Data obtained from the U.S. Bureau of Labor Statistics indicates that the 2019 year-end unemployment rate was 2.5 percent in Hamilton County. Throughout 2020 and the onset of the

COVID-19 Pandemic, unemployment levels in the county, the state, and the country increased substantially before beginning to retract in 2021. However, unemployment levels in the AA remained lower than both the state and national averages throughout the review period. The following table illustrates unemployment rates according to the U.S. Bureau of Labor and Statistics.

| Unemployment Rates |      |      |      |
|--------------------|------|------|------|
| Area               | 2019 | 2020 | 2021 |
|                    | %    | %    | %    |
| Hamilton County    | 2.5  | 4.7  | 2.2  |
| State              | 3.3  | 7.2  | 3.6  |
| National Average   | 3.7  | 8.1  | 5.3  |

*Source: Bureau of Labor Statistics*

Examiners use the FFIEC-adjusted median family income levels to analyze home mortgage lending performance under the Borrower Profile criterion. The following table contains these figures for 2019, 2020, and 2021.

| Median Family Income Ranges  |             |                         |                        |                |
|--|-------------|-------------------------|------------------------|----------------|
| Median Family Incomes  | Low<br><50% | Moderate<br>50% to <80% | Middle<br>80% to <120% | Upper<br>≥120% |
| <b>Indianapolis-Carmel-Anderson, IN MSA Median Family Income (26900)</b> |             |                         |                        |                |
| 2019 (\$77,800)  | <\$38,900   | \$38,900 to <\$62,240   | \$62,240 to <\$93,360  | ≥\$93,360      |
| 2020 (\$79,600)  | <\$39,800   | \$39,800 to <\$63,680   | \$63,680 to <\$95,520  | ≥\$95,520      |
| 2021 (\$79,700)  | <\$39,850   | \$39,850 to <\$63,760   | \$63,760 to <\$95,640  | ≥\$95,640      |

*Source: FFIEC*

## Competition

The AA is a very competitive market for financial services. According to FDIC Deposit Market Share data as of June 30, 2021, 26 FDIC-insured institutions operate 108 offices in the AA. Of these institutions, CFB ranked 22<sup>nd</sup> with 0.4 percent of the deposit market share. CFB's three branches account for 2.8 percent of FDIC-insured bank locations within the AA. Further competition comes from a variety of credit unions operating within the AA.

CFB is not required to report CRA small business data, but aggregate CRA data is included here to illustrate demand for this product. In 2020, 142 lenders reported 10,102 small business loan originations and purchases in the AA. This indicates strong competition.

There is also strong competition for home mortgage loans within the AA. According to HMDA



aggregate data, in 2020, CFB ranked 97th out of 553 lenders, with 0.2 percent of the HMDA market share.

### Community Contacts

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying the credit needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit opportunities are available. Examiners reviewed two recent community contacts in the area: an economic development organization and an affordable housing organization. One contact indicated that the local economic conditions are improving as unemployment levels decline from higher levels at the beginning of the pandemic in 2020. The housing market has limited inventory, similar to trends nationwide. The contacts identified small business and home mortgage lending as credit needs in the AA as well as affordable housing, economic development, and financial literacy.

### Credit and Community Development Needs and Opportunities

Considering information from the community contacts, bank management, and demographic and economic data, examiners determined that primary credit needs include small business and home mortgage loans. Community development needs include affordable housing, economic development, and community services.

## CONCLUSIONS ON PERFORMANCE CRITERIA IN INDIANAPOLIS MSA AA

### LENDING TEST

CFB demonstrated reasonable performance in this AA under the Lending Test. Geographic distribution and borrower profile support this conclusion.

### Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. The bank's reasonable performance in both home mortgage and small business lending supports the overall conclusion.

#### *Small Business Loans*

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA. As shown in the following table, CFB's 2020 lending performance was slightly below the percentage of businesses in moderate-income census tracts and slightly exceeded it in 2021. Limited lending opportunities exist within the moderate-income tracts as shown by the low percentage of businesses there, just over 5.0 percent. The bank's performance

relative to the demographic is reasonable throughout the review period.

| <b>Geographic Distribution of Small Business Loans</b>   |                        |            |              |                 |              |
|--|------------------------|------------|--------------|-----------------|--------------|
| <b>Assessment Area: Indianapolis MSA</b>   |                        |            |              |                 |              |
| <b>Tract Income Level</b>  | <b>% of Businesses</b> | <b>#</b>   | <b>%</b>     | <b>\$(000s)</b> | <b>%</b>     |
| Moderate   |                        |            |              |                 |              |
| 2020   | 5.3                    | 8          | 4.1          | 524             | 2.6          |
| 2021   | 5.2                    | 9          | 5.4          | 1,498           | 7.1          |
| Middle   |                        |            |              |                 |              |
| 2020   | 8.1                    | 40         | 20.6         | 4,876           | 24.5         |
| 2021   | 8.1                    | 31         | 18.7         | 5,713           | 26.9         |
| Upper  |                        |            |              |                 |              |
| 2020   | 86.6                   | 146        | 75.3         | 14,462          | 72.8         |
| 2021   | 86.6                   | 126        | 75.9         | 13,990          | 66.0         |
| <b>Totals</b>  |                        |            |              |                 |              |
| <b>2020</b>  | <b>100.0</b>           | <b>194</b> | <b>100.0</b> | <b>19,862</b>   | <b>100.0</b> |
| <b>2021</b>  | <b>100.0</b>           | <b>166</b> | <b>100.0</b> | <b>21,201</b>   | <b>100.0</b> |
| <i>Source: 2020 &amp; 2021 D&amp;B Data; Bank Data.<br/>Due to rounding, totals may not equal 100.0%</i> |                        |            |              |                 |              |

### Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. The bank's lending in the two moderate-income tracts slightly exceeded the aggregate performance in 2019 and 2020. Additionally the performance for all three years slightly exceeded the percentage of owner-occupied housing units in those tracts. This reflects reasonable performance. The following table details the geographic distribution of home mortgage loans in this AA.

| <b>Geographic Distribution of Home Mortgage Loans</b> |  |                                     |          |          |                 |          |
|---|--|-------------------------------------|----------|----------|-----------------|----------|
| <b>Assessment Area: Indianapolis MSA</b>              |  |                                     |          |          |                 |          |
| <b>Tract Income Level</b>                             | <b>% of Owner-Occupied Housing Units</b> | <b>Aggregate Performance % of #</b> | <b>#</b> | <b>%</b> | <b>\$(000s)</b> | <b>%</b> |
| Moderate  |  |                                     |          |          |                 |          |
| 2019  | 1.5                                      | 1.3                                 | 1        | 4.5      | 65              | 1.1      |
| 2020  | 1.5                                      | 1.0                                 | 2        | 2.9      | 336             | 2.0      |
| 2021  | 1.5                                      | --                                  | 2        | 3.8      | 183             | 1.3      |
| Middle  |  |                                     |          |          |                 |          |
| 2019  | 11.5                                     | 10.3                                | 6        | 27.3     | 1,671           | 27.3     |
| 2020  | 11.5                                     | 9.2                                 | 12       | 17.6     | 2,842           | 16.7     |
| 2021  | 11.5                                     | --                                  | 8        | 15.4     | 2,445           | 17.4     |
| Upper   |  |                                     |          |          |                 |          |

|  |              |              |           |              |               |              |
|--|--------------|--------------|-----------|--------------|---------------|--------------|
| 2019   | 87.0         | 88.4         | 15        | 68.2         | 4,386         | 71.6         |
| 2020   | 87.0         | 89.7         | 54        | 79.4         | 13,834        | 81.3         |
| 2021   | 87.0         | --           | 42        | 80.8         | 11,441        | 81.3         |
| <b>Totals</b>  |              |              |           |              |               |              |
| <b>2019</b>  | <b>100.0</b> | <b>100.0</b> | <b>22</b> | <b>100.0</b> | <b>6,122</b>  | <b>100.0</b> |
| <b>2020</b>  | <b>100.0</b> | <b>100.0</b> | <b>68</b> | <b>100.0</b> | <b>17,012</b> | <b>100.0</b> |
| <b>2021</b>  | <b>100.0</b> | <b>--</b>    | <b>52</b> | <b>100.0</b> | <b>14,069</b> | <b>100.0</b> |
| <i>Source: 2015 ACS, Bank Data, 2019 &amp; 2020 HMDA Aggregate Data, "--" data not available.<br/>Due to rounding, totals may not equal 100.0%</i> |              |              |           |              |               |              |

## Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration of loans among individuals of different income levels and businesses of different sizes. The bank's reasonable performance in both home mortgage and small business lending supports this conclusion.

### Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. As illustrated in the following table, CFB's 2020 lending performance exceeded the percentage of businesses that reported revenues of \$1.0 million or less and was somewhat below this demographic in 2021. However, the percentage of businesses is not a direct reflection of those seeking financing. In addition, smaller businesses tend to seek alternate forms of financing including home equity lines of credit or credit cards, resulting in decreased demand for small business loans among those borrowers. Considering these factors, CFB's performance is reasonable.

| Distribution of Small Business Loans by Gross Annual Revenue Category<br>Assessment Area: Indianapolis MSA |                 |           |              |              |              |
|--|-----------------|-----------|--------------|--------------|--------------|
| Gross Revenue Level  | % of Businesses | #         | %            | \$(000s)     | %            |
| ≤\$1,000,000   |                 |           |              |              |              |
| 2020   | 89.9            | 36        | 92.3         | 5,970        | 95.4         |
| 2021   | 90.9            | 41        | 77.4         | 3,443        | 43.5         |
| >\$1,000,000   |                 |           |              |              |              |
| 2020   | 3.8             | 3         | 7.7          | 288          | 4.6          |
| 2021   | 3.1             | 12        | 22.6         | 4,468        | 56.5         |
| Revenue Not Available  |                 |           |              |              |              |
| 2020   | 6.3             | 0         | 0.0          | 0            | 0.0          |
| 2021   | 5.9             | 0         | 0.0          | 0            | 0.0          |
| <b>Totals</b>  |                 |           |              |              |              |
| <b>2020</b>  | <b>100.0</b>    | <b>39</b> | <b>100.0</b> | <b>6,258</b> | <b>100.0</b> |
| <b>2021</b>  | <b>100.0</b>    | <b>53</b> | <b>100.0</b> | <b>7,911</b> | <b>100.0</b> |

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

### Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among individuals of different income levels. As shown in the following table, 8.6 percent of families in the AA are low income. This includes 3.5 percent of families with incomes below the poverty level. As mentioned previously, these families may have difficulty qualifying for and/or servicing debt in amounts necessary to finance homes in the AA. Although the bank did not make any home mortgage loans to low-income borrowers in this AA in 2019, the performance increased in 2020 and was comparable to aggregate performance. Performance increased further in 2021.

The bank's lending to moderate-income borrowers exceeded the aggregate in 2019 and then fell below aggregate in 2020. The bank's 2021 performance increased from 2020 and was comparable to the percentage of moderate-income families in the AA.

Overall, this reflects reasonable performance.

| Distribution of Home Mortgage Loans by Borrower Income Level |               |                              |           |              |              |              |
|--|---------------|------------------------------|-----------|--------------|--------------|--------------|
| Assessment Area: Indianapolis MSA                            |               |                              |           |              |              |              |
| Borrower Income Level  | % of Families | Aggregate Performance % of # | #         | %            | \$(000s)     | %            |
| Low  |               |                              |           |              |              |              |
| 2019   | 8.6           | 3.4                          | 0         | 0.0          | 0            | 0.0          |
| 2020   | 8.6           | 2.6                          | 2         | 2.9          | 160          | 0.9          |
| 2021   | 8.6           | --                           | 2         | 3.8          | 191          | 1.4          |
| Moderate   |               |                              |           |              |              |              |
| 2019   | 11.1          | 11.7                         | 4         | 18.2         | 411          | 6.7          |
| 2020   | 11.1          | 11.0                         | 4         | 5.9          | 571          | 3.4          |
| 2021   | 11.1          | --                           | 7         | 13.5         | 1,061        | 7.5          |
| Middle   |               |                              |           |              |              |              |
| 2019   | 15.9          | 19.1                         | 5         | 22.7         | 1,062        | 17.4         |
| 2020   | 15.9          | 18.1                         | 23        | 33.8         | 4,503        | 26.5         |
| 2021   | 15.9          | --                           | 8         | 15.4         | 1,958        | 13.9         |
| Upper  |               |                              |           |              |              |              |
| 2019   | 64.3          | 53.1                         | 12        | 54.5         | 4,329        | 70.7         |
| 2020   | 64.3          | 54.7                         | 34        | 50.0         | 10,368       | 60.9         |
| 2021   | 64.3          | --                           | 29        | 55.8         | 9,343        | 66.4         |
| Not Available  |               |                              |           |              |              |              |
| 2019   | 0.0           | 12.6                         | 1         | 4.5          | 319          | 5.2          |
| 2020   | 0.0           | 13.6                         | 5         | 7.4          | 1,410        | 8.3          |
| 2021   | 0.0           | --                           | 6         | 11.5         | 1,516        | 10.8         |
| <b>Total</b>   |               |                              |           |              |              |              |
| <b>2019</b>  | <b>100.0</b>  | <b>100.0</b>                 | <b>22</b> | <b>100.0</b> | <b>6,121</b> | <b>100.0</b> |

|  |              |              |           |              |               |              |
|--|--------------|--------------|-----------|--------------|---------------|--------------|
| <b>2020</b>  | <b>100.0</b> | <b>100.0</b> | <b>68</b> | <b>100.0</b> | <b>17,012</b> | <b>100.0</b> |
| <b>2021</b>  | <b>100.0</b> | <b>--</b>    | <b>52</b> | <b>100.0</b> | <b>14,069</b> | <b>100.0</b> |
| <i>Source: 2015 ACS; Bank Data, 2019 &amp; 2020 HMDA Aggregate Data, "--" data not available.<br/>Due to rounding, totals may not equal 100.0%</i> |              |              |           |              |               |              |

## COMMUNITY DEVELOPMENT TEST

CFB demonstrated adequate responsiveness to the community development needs of this AA through community development loans, qualified investments, and community development services. Examiners considered the institution’s capacity and the need and availability of such opportunities. As discussed previously, limited community development opportunities exist within Hamilton County, and CFB did not have a presence in Marion County until February 2022.

However, qualified community development activities within Marion County were considered throughout the review period.

### Community Development Loans

During the evaluation period, CFB originated 98 community development loans totaling approximately \$11.9 million within this AA. CFB granted most of its community development loans under the PPP, which helped to revitalize or stabilize low- or moderate-income geographies and retain jobs for low- or moderate-income individuals during the COVID-19 pandemic. The following table provides details on the community development lending activity in this AA.

| <b>Community Development Lending<br/>Assessment Area: Indianapolis MSA</b> |                           |                 |                           |                 |                             |                 |                                |                 |               |                 |
|--|---------------------------|-----------------|---------------------------|-----------------|-----------------------------|-----------------|--------------------------------|-----------------|---------------|-----------------|
| <b>Activity Year</b>   | <b>Affordable Housing</b> |                 | <b>Community Services</b> |                 | <b>Economic Development</b> |                 | <b>Revitalize or Stabilize</b> |                 | <b>Totals</b> |                 |
|  | <b>#</b>                  | <b>\$(000s)</b> | <b>#</b>                  | <b>\$(000s)</b> | <b>#</b>                    | <b>\$(000s)</b> | <b>#</b>                       | <b>\$(000s)</b> | <b>#</b>      | <b>\$(000s)</b> |
| 2019   | 0                         | 0               | 0                         | 0               | 0                           | 0               | 0                              | 0               | 0             | 0               |
| 2020   | 0                         | 0               | 0                         | 0               | 16                          | 1,443           | 31                             | 5,222           | 47            | 6,665           |
| 2021   | 0                         | 0               | 0                         | 0               | 14                          | 1,593           | 37                             | 3,634           | 51            | 5,227           |
| YTD 2022   | 0                         | 0               | 0                         | 0               | 0                           | 0               | 0                              | 0               | 0             | 0               |
| <b>Total</b>   | <b>0</b>                  | <b>0</b>        | <b>0</b>                  | <b>0</b>        | <b>30</b>                   | <b>3,036</b>    | <b>68</b>                      | <b>8,856</b>    | <b>98</b>     | <b>11,892</b>   |
| <i>Source: Bank Data; Review period 04/29/2019 to 06/22/2022</i>           |                           |                 |                           |                 |                             |                 |                                |                 |               |                 |

The following are notable examples of CFB’s community development loans in this AA:

- Two loans totaling \$2.6 million to a medical coding business located in a moderate-income tract in Marion County. Loan proceeds allowed the business to retain nearly 150 jobs for low- and moderate income persons.
- One loan totaling \$1.0 million to a home health-care business that provides pediatric and senior care. The organization is a Medicaid home health provider. Loan proceeds helped to retain over 230 jobs, many of which were lower wage jobs.
- Two loans totaling \$643,000 to a community-based organization located in Marion

County. The organization provides life skills training, emergency shelter, transitional housing, and family support services, among other things. Loan proceeds allowed the organization to retain nearly 100 jobs for low- and moderate-income persons.

### Qualified Investments

CFB made no qualified investments in this AA during the evaluation period; however, it made 10 qualifying donations and grants totaling \$9,280. Examples include: healthcare services for uninsured and underinsured residents of Hamilton County and surrounding areas, scholarships for students attending a local college where 73 percent of students receive financial assistance, and funding for food banks and schools to provide food-insecure individuals and students with healthy meals. The following table illustrates CFB’s community development donations and grants by category.

| <b>Qualified Investments.</b>            |                           |                 |                           |                 |                             |                 |                                |                 |               |                 |
|--|---------------------------|-----------------|---------------------------|-----------------|-----------------------------|-----------------|--------------------------------|-----------------|---------------|-----------------|
| <b>Assessment Area: Indianapolis MSA</b> |                           |                 |                           |                 |                             |                 |                                |                 |               |                 |
| <b>Activity Year</b>                     | <b>Affordable Housing</b> |                 | <b>Community Services</b> |                 | <b>Economic Development</b> |                 | <b>Revitalize or Stabilize</b> |                 | <b>Totals</b> |                 |
|  | <b>#</b>                  | <b>\$(000s)</b> | <b>#</b>                  | <b>\$(000s)</b> | <b>#</b>                    | <b>\$(000s)</b> | <b>#</b>                       | <b>\$(000s)</b> | <b>#</b>      | <b>\$(000s)</b> |
| Qualified Grants & Donations             | 0                         | 0               | 10                        | 9               | 0                           | 0               | 0                              | 0               | 10            | 9               |
| <b>Total</b>                             | <b>0</b>                  | <b>0</b>        | <b>10</b>                 | <b>9</b>        | <b>0</b>                    | <b>0</b>        | <b>0</b>                       | <b>0</b>        | <b>10</b>     | <b>9</b>        |

*Source: Bank Data; Review period 04/29/2019 to 06/22/2022*

### Community Development Services

During the evaluation period, four bank directors and employees provided five instances of financial expertise and technical assistance to three community development organizations serving this AA. The following table illustrates the instances of community development services by year and purpose.

| <b>Community Development Services</b>    |                           |                           |                             |                                |               |
|--|---------------------------|---------------------------|-----------------------------|--------------------------------|---------------|
| <b>Assessment Area: Indianapolis MSA</b> |                           |                           |                             |                                |               |
| <b>Activity Year</b>                     | <b>Affordable Housing</b> | <b>Community Services</b> | <b>Economic Development</b> | <b>Revitalize or Stabilize</b> | <b>Totals</b> |
|  | <b>#</b>                  | <b>#</b>                  | <b>#</b>                    | <b>#</b>                       | <b>#</b>      |
| 2019                                     | 0                         | 1                         | 1                           | 0                              | 2             |
| 2020                                     | 0                         | 2                         | 1                           | 0                              | 3             |
| 2021                                     | 0                         | 0                         | 0                           | 0                              | 0             |
| YTD 2022                                 | 0                         | 0                         | 0                           | 0                              | 0             |
| <b>Total</b>                             | <b>0</b>                  | <b>3</b>                  | <b>2</b>                    | <b>0</b>                       | <b>5</b>      |

*Source: Bank Data; Review period 04/29/2019 to 06/22/2022*

The following are examples of CFB’s community development services in this AA:

- An employee provides financial expertise to an organization located in a low-

income area within Marion County. The organization offers outreach programs including mentoring, tutoring, and counseling to inner-city children within the greater Indianapolis area. Over 62 percent of the student population within Marion County qualify for lunch subsidies.

- A board member provides financial expertise to a foundation that provides mental health counseling, healthcare, mentoring, basic necessities, and recreational opportunities to underprivileged youth within the AA.
- An employee provides financial expertise to an organization that promotes small business development, workforce attraction and retention, community preservation, and economic development throughout Hamilton County.

## APPENDICES

### INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

#### Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

## GLOSSARY

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent



an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
  - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

**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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, 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 do 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; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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 metropolitan area/assessment area.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area (also known as non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multistate metropolitan 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle- income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

## 1.3 Active Branches

### Active Branches as of March 19, 2024

#### [Howard County, Indiana](#)

##### **Main Office & ATM**

Census Tract: 0002.00 (Moderate)  
MSA: Kokomo IN  
201 W. Sycamore St.  
Kokomo, IN 46901  
(765) 236-0600

##### Lobby Hours:

Mon. – Fri. 9:00 am – 5:00 pm

##### **Dixon Road Branch & ATM**

Census Tract: 0008.00 (Middle)  
MSA: Kokomo IN  
2101 S. Dixon Rd.  
Kokomo, IN 46902  
(765) 456-4287

##### Lobby Hours:

Mon. – Fri. 9:00 am – 5:00 pm

Sat. 9:00 am – 12:00 pm

##### Drive-Up Hours:

Mon. – Fri. 8:30 am – 5:30 pm

Sat. 9:00 am – 12:00 pm

ATM Open 24/7

##### **Hoffer Street Branch & ATM**

Census Tract: 0012.00 (Low)  
MSA: Kokomo IN  
1308 E. Hoffer St.  
Kokomo, IN 46902  
(765) 456-4368

##### Lobby Hours:

Mon. – Fri. 9:00 am – 5:00 pm

##### Drive-Up Hours:

Mon. – Fri. 8:30 am – 5:30 pm

ATM Open 24/7

#### [Hamilton County, Indiana](#)

##### **Oak Ridge Branch & ATM**

Census Tract: 1104.01 (Middle)  
MSA: Indianapolis-Carmel-Anderson IN  
707 E. State Road 32  
Westfield, IN 46074  
(317) 763-5338

**Lobby Hours:**

Mon. – Fri. 9:00 am – 5:00 pm

Sat. 9:00 am – 12:00 pm

**Drive-Up Hours:**

Mon. – Fri. 8:30 am – 5:30 pm

Sat. 9:00 am – 12:00 pm

ATM Open 24/7

**Junction Crossing Branch & ATM**

Census Tract: 1104.03 (Middle)  
MSA: Indianapolis-Carmel-Anderson IN  
381 S. Junction Crossing  
Westfield, IN 46074  
(317) 763-5259

**Lobby & Drive-Up Hours:**

Mon. – Fri. 9:00 am – 5:00 pm

ATM Open 24/7

**Pebble Village Branch & ATM**

Census Tract: 1105.07 (Upper)  
MSA: Indianapolis-Carmel-Anderson IN  
17661 Village Center Drive  
Noblesville, IN 46062  
(317) 399-7500

**Lobby Hours:**

Mon. – Fri. 9:00 am – 5:00 pm

**Drive-Up Hours:**

Mon. – Fri. 8:30 am – 5:30 pm

ATM Open 24/7

**One Concourse Branch & ATM**

Census Tract: 1108.10 (Upper)  
MSA: Indianapolis-Carmel-Anderson IN  
9998 Crosspoint Blvd. Suite 100  
Indianapolis, IN 46256  
(317) 399-7488

**Lobby Hours:**

Mon. – Fri. 9:00 am – 5:00 pm

Walk-up ATM Open 24/7

## Marion County, Indiana

### **Meridian North Branch & ATM**

Census Tract: 3201.07 (Upper)

MSA: Indianapolis-Carmel-Anderson IN

9333 N. Meridian St. Suite 125

Indianapolis, IN 46260

(317) 343-6999

#### Lobby Hours:

Mon. – Fri.: 9:00 am – 5:00 pm

#### Drive-Up Hours:

Mon. – Thu.: 9:00 am – 5:00 pm

Fri.: 9:00 am – 5:30 pm

ATM Open 24/7



## 1.4 Branches Opened and Closed History

Branches Opened and Closed as of March 14, 2025

### 2024

#### Opened

February 5, 2024

One Concourse Branch & ATM

Census Tract: 1108.10 (Upper)

MSA: Indianapolis-Carmel-Anderson IN

9998 Crosspoint Blvd. Suite 100

Indianapolis, IN 46256

#### Closed

None

### 2023

#### Opened

None

#### Closed

None

## 1.5 Retail Banking Services and Fee Schedule

### Consumer Deposit Products and Services

- **Checking Accounts**
  - Community Free Checking
  - Community Direct Interest Checking
  - Community 50 Plus Interest Checking
  - Community Premium Interest Checking
  - Work Perks Checking
- **Savings Accounts**
  - Personal Savings
  - Personal Money Market
  - Christmas Club
  - Piggy Bank
  - Work Perks Money Market
- **Other Deposit Accounts**
  - Health Savings Accounts
  - Certificates of Deposit (various rates & maturities)
  - Individual Retirement Accounts (various rates & maturities)
- **Consumer Credit Cards**
- **Consumer Loans**
  - Mortgage Loans
    - Purchase
    - Refinance
    - Construction
    - Home Equity Loan
    - Home Equity Line of Credit
  - Auto Loans
  - Motorcycle Loans
  - Boat Loans
  - RV/Trailer Loans
  - Power Sport Vehicle Loans
  - CD Savings Secured Loans
  - Unsecured Personal Loans
  - Student Loans (referrals to InvestED)
- **Retirement & Investment Services through Community First Investment Group**
- **Travel Club**
- **ATMs**
- **Debit Cards**
- **Direct Deposit**
- **Mobile Banking & Mobile Deposit**
- **Night Drop**
- **Online Account Application**
- **Online Banking**
- **Online Bill Pay**
- **Online Statements**

- **Self-Serve Storage Boxes**
- **Wire Transfers**

## Business Deposit Products and Services

- **Checking Accounts**
  - Community Free Business Checking
  - Community at Heart Interest Checking
  - Community Commercial Checking
  - IOLTA Business Checking
- **Savings Accounts**
  - Business Savings
  - Business Money Market
  - Certificate of Deposit (various rates & maturities)
- **Treasury Management Solutions**
  - Online Banking
  - Automated Clearing House Origination
  - Remote Deposit Capture
  - Check Positive Pay
  - ACH Positive Pay
  - Online Wire Transfer Origination
  - Sweep Accounts
- **Business Loans**
  - Commercial Term Loans
  - Commercial Mortgages
  - Commercial Construction Loans
  - Working Capital Lines of Credit
  - Small Business Administration Loans
  - Agricultural Loans
- **Merchant Services**
- **ATMs**
- **Business Credit Cards**
- **Business Debit Cards**
- **Mobile Banking & Mobile Deposit**
- **Night Drop**
- **Online Banking**
- **Online Bill Pay**
- **Online Statements**
- **Wire Transfers**
- **Autobooks**

## Fee Schedule As of April 1, 2023

**Account Closed**  
 < 90 days, \$25.00

**Account Reconciliation/Research**

\$35.00 per hour, 1 hour minimum

**ACH**

Return Items, \$10.00

**ATM Activity (including account inquiry)**

Non-Community First ATM, \$0.00\*; ATM/Debit Card Replacement, \$10.00

**Coin/Currency Exchanges**

Non-Customer, 5% per exchange

**Counter Checks**

\$2.00 each

**Duplicate Statement**

\$5.00

**Extended Overdraft**

Assessed when the account remains overdrawn for 10 consecutive business days, \$25.00

**Inactive Account (dormant)**

Assessed when the account has no activity for an extended period of time, \$5.00 per month.  
Checking over 1 year; Savings over 2 years.

**Night Depository**

Customer to purchase cold seal bags. Lost key replacement/Additional keys, \$5.00 each

**Non-Sufficient Funds (NSF)/Overdraft**

NSF (when an item is returned unpaid), \$35.00 each; Overdraft (when an item is paid), \$35.00 each

**Official Bank Check**

Customer, \$7.00

**Returned Paper or Electronic Statements**

\$5.00 per month

**Returned Deposited Item**

Domestic, \$15.00 per item; Foreign, \$25.00 per item. Other bank fees and charges may apply.

**Self-Serve Storage Box (sizes may vary by locations)**

3 x 5, \$25.00 year; 3 x 10, \$40.00 year; 5 x 10, \$50.00 year; 7 x 10, \$65.00 year; 10 x 10, \$85.00 year.  
Drill Fee (includes non-receipt of 2 keys when box is surrendered), Fair Market Cost

**Stop Payment**

Personal, \$20.00; Business, \$35.00

**Wire Transfer – For Customers Only**

Domestic Incoming, \$15.00; Domestic Outgoing, \$25.00; International Incoming, \$15.00\*\*;  
International Outgoing, \$50.00\*\*

*\*Other financial institutions may charge a fee.*

*\*\*Plus, correspondent bank fee.*

## 1.6 Assessment Area Map & Census Tracts

### Community First Bank of Indiana Assessment Areas

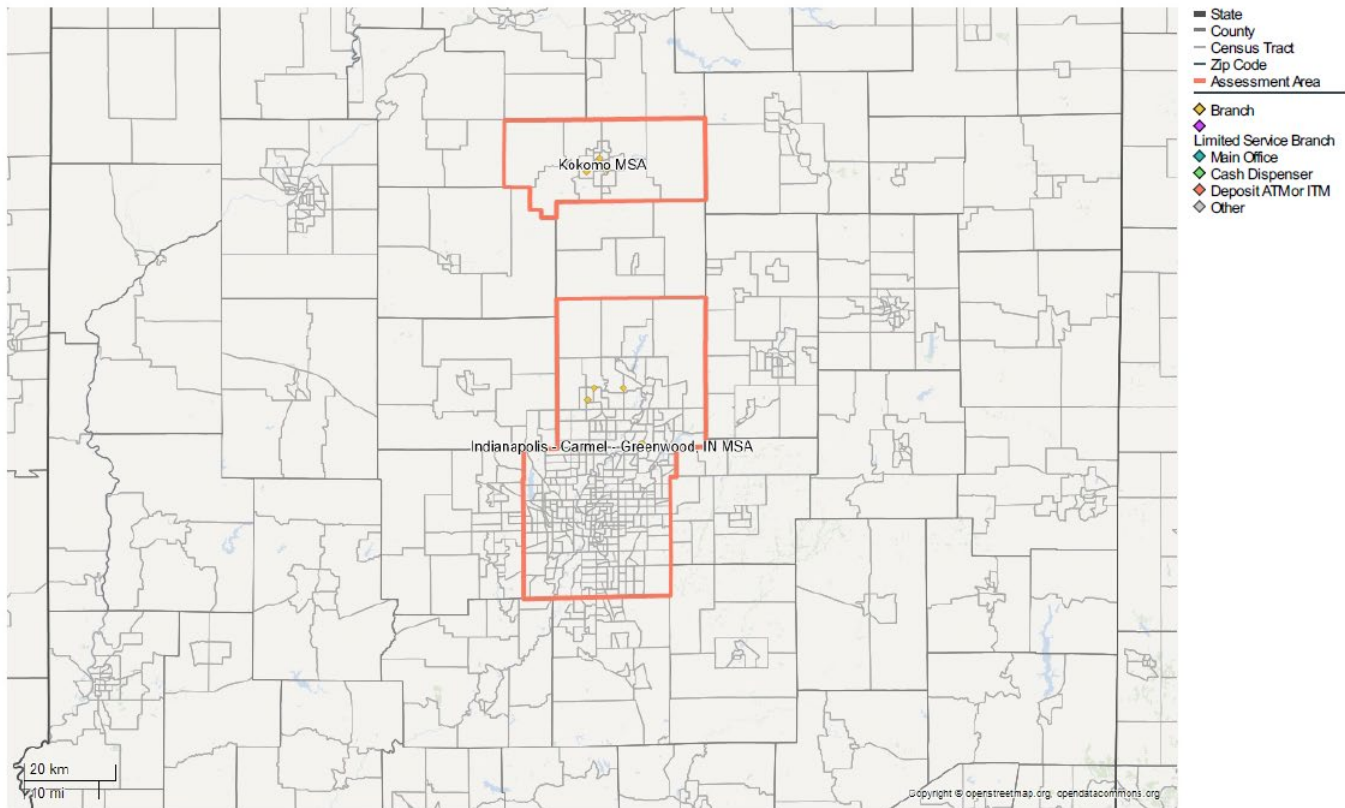
Howard County (Kokomo MSA)

Hamilton County (Indy MSA)

Marion County (Indy MSA)

#### Community First Bank of Indiana

Assessment Area map



### Assessment Area Census Tracts as of March 14, 2025

#### Census Tracts for 067 – Howard County

|   |    |     |
|---|----|-----|
| 2 | 7  | 12  |
| 3 | 8  | 13  |
| 4 | 9  | 14  |
| 5 | 10 | 15  |
| 6 | 11 | 101 |

|        |     |     |
|--------|-----|-----|
| 102.01 | 103 | 105 |
| 102.02 | 104 | 106 |

Census Tracts for 057 – Hamilton County

|         |         |         |
|---------|---------|---------|
| 1101.01 | 1105.17 | 1109.04 |
| 1101.02 | 1105.18 | 1109.05 |
| 1102.01 | 1106    | 1109.06 |
| 1102.02 | 1107    | 1109.07 |
| 1103.01 | 1108.05 | 1109.09 |
| 1103.02 | 1108.07 | 1109.1  |
| 1103.03 | 1108.1  | 1109.11 |
| 1104.01 | 1108.11 | 1109.12 |
| 1104.04 | 1108.12 | 1110.03 |
| 1104.05 | 1108.13 | 1110.04 |
| 1104.06 | 1108.14 | 1110.06 |
| 1105.05 | 1108.15 | 1110.07 |
| 1105.09 | 1108.16 | 1110.09 |
| 1105.11 | 1108.17 | 1110.1  |
| 1105.12 | 1108.18 | 1110.11 |
| 1105.13 | 1108.19 | 1110.12 |
| 1105.14 | 1108.2  | 1111.01 |
| 1105.15 | 1108.21 | 1111.03 |
| 1105.16 | 1108.22 | 1111.04 |

Census Tracts for 097 – Marion County

|         |         |         |
|---------|---------|---------|
| 3101.04 | 3202.02 | 3217    |
| 3101.05 | 3202.03 | 3218    |
| 3101.06 | 3202.05 | 3219    |
| 3101.08 | 3202.06 | 3220    |
| 3101.1  | 3203.01 | 3221    |
| 3101.11 | 3203.03 | 3222    |
| 3101.12 | 3203.05 | 3223    |
| 3101.13 | 3203.06 | 3224    |
| 3102.01 | 3204    | 3225    |
| 3102.03 | 3205    | 3226.01 |
| 3102.04 | 3206    | 3226.02 |
| 3103.05 | 3207    | 3227    |
| 3103.06 | 3208    | 3301.03 |
| 3103.08 | 3209.01 | 3301.05 |
| 3103.09 | 3209.02 | 3301.06 |
| 3103.1  | 3209.03 | 3301.07 |
| 3103.11 | 3210.01 | 3301.08 |
| 3103.12 | 3210.02 | 3301.09 |
| 3201.05 | 3211    | 3302.03 |
| 3201.06 | 3212    | 3302.04 |
| 3201.07 | 3213    | 3302.06 |
| 3201.08 | 3214    | 3302.08 |
| 3201.09 | 3216    | 3302.1  |

3302.11  
3302.12  
3302.13  
3304.01  
3305  
3306  
3307.01  
3307.02  
3308.03  
3308.04  
3308.05  
3308.06  
3309  
3310  
3401.01  
3401.02  
3401.08  
3401.11  
3401.12  
3401.13  
3401.14  
3401.15  
3402.01  
3402.02  
3403.01  
3403.02  
3404  
3405  
3406  
3407  
3408



## 2.1 HMDA Disclosure

### Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age and income of applicants and borrowers; and information about loan approvals and denials. HMDA data for many other financial institutions are also available online. These data are available online at the Consumer Financial Protection Bureau's Web site [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).

## 2.3 Loan-to-Deposit Ratios

| 2025           |        |
|----------------|--------|
| First Quarter  | 95.41% |
| Second Quarter | 95.70% |
| Third Quarter  | 95.91% |
| Fourth Quarter | 96.30% |