



Community Reinvestment Act (CRA)
Public File

Table of Contents

1.1 Written Comments from the Public and Bank Responses	3
1.2 CRA Performance Evaluation	4
A. Institution rating	4
B. Description of institution	5
C. Description of assessment areas	7
D. Scope of evaluation	7
A. <i>Conclusions on performance criteria</i>	8
B. <i>Discriminatory or other illegal credit practices review</i>	12
E. Kokomo, IN MSA AA – full-scope review	12
F. Indianapolis MSA AA – full-scope review	20
G. Appendices	28
Intermediate small bank performance criteria	28
Glossary	29
1.3 Active Branches	35
1.4 Branches Opened and Closed	38
1.5 Retail Banking Services List & Fee Schedule	39
A. Consumer Deposit Products and Services	39
B. Business Deposit Products and Services	40
C. Fee Schedule	40
1.6 Assessment Area Map & Census Tracts	43
A. Area Map	43
B. Census Tracts	44
2.1 HMDA Disclosure	46
2.3 Loan to Deposit Ratios – Prior Calendar Year	47

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

April 14, 2025

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 areas, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit (LTD) ratio is more than reasonable given the institution's size, financial condition, assessment areas' credit needs, and economic conditions.
- The institution made a majority of its small business and home mortgage loans in the assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration of loans 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 rating.

The Community Development Test is rated Satisfactory.

The institution demonstrated adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services, as appropriate. Examiners considered the institution's capacity and the need and availability of such opportunities for community development in the assessment areas.

DESCRIPTION OF INSTITUTION

Community First Bank of Indiana (CFB) is headquartered in Kokomo, Indiana, and serves central and north-central Indiana. It is a wholly owned subsidiary of Community First Financial Corporation, a single bank holding company also based in Kokomo. CFB holds a controlling interest in First Signature Lending LLC, an affiliate of the bank.

Examiners assigned a Satisfactory rating at the institution's previous evaluation dated June 22, 2022, using the Federal Financial Institutions Examination Council's (FFIEC) Interagency Intermediate Small Institution CRA Examination Procedures.

CFB operates eight branch locations, including its main office, across Howard, Hamilton, and Marion counties. The separate assessment area description sections include a breakdown of branches within each of the bank's two assessment areas. In February 2024, CFB opened a new branch office in an upper-income tract in southern Hamilton County. The bank did not close any branches or engage in merger or acquisition activity since the previous evaluation.

CFB offers a variety of loan and deposit products for individuals and businesses. Among personal loan products, the bank offers home mortgage loans, automobile and boat loans, motorcycle loans, loans secured by certificates of deposit, unsecured loans, and student loans. Personal deposit products offered include checking accounts, savings accounts, certificates of deposit including

individual retirement accounts, and health savings accounts. Additionally, personal accounts have online banking, bill pay services, mobile banking, and online statements among alternative banking options.

Commercial loan products include term loans, commercial real estate loans, construction loans, and working capital lines of credit. Commercial deposit account products offered include checking, savings, money market accounts, and certificates of deposit. Additionally, CFB offers online banking, remote deposit capture, check positive pay, ACH positive pay, and online wire transfer origination among the treasury management solutions for business customers. The bank also offers access to surcharge-free ATMs as a member of the Allpoint Network.

CFB experienced significant growth since the previous evaluation, which is attributable to increased lending activity and the institution's branch network expansion over the past two evaluation periods. According to the Consolidated Reports of Condition and Income (Call Report) dated December 31, 2024, the bank had total assets of \$838.7 million, total loans of \$697.7 million, total deposits of \$691.5 million, and total securities of \$11.2 million. Since the previous evaluation, total assets grew 44.7 percent, total loans grew 60.1 percent, total deposits grew 45.7 percent, and total securities grew 70.8 percent.

Commercial loans comprise a majority of CFB's loan portfolio. The following table details the distribution of the loan portfolio as of December 31, 2024.

Loan Portfolio Distribution as of 12/31/2024		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	149,814	21.5
Secured by Farmland	3,621	0.5
Secured by 1-4 Family Residential Properties	137,114	19.6
Secured by Multifamily (5 or more) Residential Properties	10,291	1.5
Secured by Nonfarm Nonresidential Properties	271,231	38.9
Total Real Estate Loans	572,071	82.0
Commercial and Industrial Loans	112,827	16.2
Agricultural Production and Other Loans to Farmers	118	0.0
Consumer Loans	11,117	1.6
Obligations of States and Political Subdivisions in the United States	0	0.0
Other Loans	1,610	0.2
Less: Unearned Income	0	0
Total Loans	697,743	100.0
<i>Source: Reports of Condition and Income</i>		

There are no financial, legal, or other impediments that would limit CFB's ability to meet the credit of its assessment areas.

DESCRIPTION OF ASSESSMENT AREAS

The CRA regulations require each financial institution to define one or more assessment areas within which examiners evaluate its CRA performance. CFB delineates two assessment areas as described below:

- Kokomo, Indiana Metropolitan Statistical Area (MSA) Assessment Area – comprised of the entirety of Howard County
- Indianapolis, Indiana MSA Assessment Area – comprised of the entirety of Hamilton and Marion counties in the Indianapolis-Carmel-Greenwood, Indiana MSA

The assessment areas conform to the CRA regulations and do not arbitrarily exclude any low- or moderate-income census tracts. Each assessment area section that follows includes economic and demographic data and a description of the institution’s operations.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated June 22, 2022, to the current evaluation dated April 14, 2025. Examiners used the Interagency Intermediate Small Institution CRA Examination Procedures to evaluate CFB’s CRA performance. The procedures include the Lending Test and the Community Development Test. The appendices include performance criteria for each of these tests. 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 assessment areas. The institution’s performance in each assessment area contributed equal weight to the overall conclusions considering lending activities, deposit levels, and the distribution of branch operations. The following table details the reviewed loans, deposits, and branch operations by assessment area.

Assessment Area Breakdown of Loans, Deposits and Branches						
Assessment Area	Loans *		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Kokomo, IN MSA	61,117	45.9	503,349	78.1	3	37.5
Indianapolis, IN MSA	72,039	54.1	140,901	21.9	5	62.5
Total	133,156	100.0	644,250	100.0	8	100.0
<i>Source: Bank Records; FDIC Summary of Deposits (06/30/2024). *Loans include 2024 small business loans and 2022-2024 home mortgage loans.</i>						

Activities Reviewed

As reflected in the Call Report dated December 31, 2024, the loan portfolio is comprised primarily of commercial and residential loans. Examiners analyzed CFB’s small business and home mortgage lending as these loan types are the primary lending focus. Examiners did not consider small farm loans or consumer loans as they are not major product lines, nor do they represent a significant portion of the institution’s lending activities during the evaluation period. No other product

represented a significant portion of the institution's loan portfolio.

CFB is not required to report small business loan data. Examiners determined that the institution's small business lending activity in 2024 was representative of its activity for that product throughout the evaluation period. Accordingly, examiners analyzed the full universe of small business loans originated or renewed from January 1, 2024, through December 31, 2024. During this period, CFB originated or renewed 360 small business loans, of which nine loans qualified as community development loans and were considered in the Community Development Test. As a result, examiners analyzed 351 small business loans originated or renewed in 2024 for a total of \$71.2 million in the Lending Test. Examiners compared CFB's small business lending performance to 2024 Dun & Bradstreet (D&B) data.

CFB is required to report home mortgage applications under the Home Mortgage Disclosure Act (HMDA). Accordingly, examiners analyzed all home mortgage loan originations and purchases reported on the institution's 2022, 2023, and 2024 Loan Application Registers. CFB originated 224 loans totaling \$55.6 million in 2022, 162 loans totaling \$34.3 million in 2023, and 152 loans totaling \$35.8 million in 2024. Examiners did not identify any material variances in performance between 2022 and 2024; therefore, this evaluation presents the bank's geographic distribution and borrower profile performance for home mortgage lending in 2023 only. U.S. Census data for 2020 and HMDA aggregate performance data served as comparators for analysis; 2023 is the most recent year for which aggregate lending performance data is available. Examiners emphasized performance relative to aggregate lending data as a better indicator of market demand.

The institution's record of originating small business loans contributed more weight to the overall conclusions as this product had the largest volume of originations by number and dollar volume. While examiners reviewed performance by number and dollar amount of loans, this evaluation emphasizes performance by number of loans as it is a better indicator of the number of individuals and businesses served.

Under the Community Development Test, examiners evaluated bank-provided community development loans, qualified investments and donations, and community development services since the previous evaluation.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

CFB demonstrated satisfactory performance under the Lending Test. The institution's performance under each criterion supports the conclusion.

Loan-to-Deposit Ratio

CFB's LTD ratio is more than reasonable given the institution's size, financial condition, and assessment areas' credit needs. The institution's net LTD ratio, calculated from Call Report data,

averaged 98.1 percent over the past 11 quarters from June 30, 2022, through December 31, 2024. The ratio fluctuated from a low of 90.5 percent to a high of 102.7 percent during the evaluation period.

Examiners compared CFB’s net LTD ratio to that of two similarly situated institutions selected based on asset size, geographic location, and lending focus. As shown in the following table, CFB’s net LTD ratio exceeded the ratios of the similarly situated institutions, reflecting more than reasonable performance.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 12/31/2024 (\$000s)	Average Net LTD Ratio (%)
Community First Bank of Indiana	838,727	98.1
Similarly Situated Institution #1	814,917	80.9
Similarly Situated Institution #2	860,757	70.6
<i>Source: Reports of Condition and Income 06/30/2022 through 12/31/2024</i>		

Assessment Area Concentration

CFB originated a majority of its small business and home mortgage loans by number and dollar volume within the assessment areas during the evaluation period. The following table details the institution’s performance each year reviewed.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$ (000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$ (000s)	%	\$ (000s)	%	
Home Mortgage										
2022	166	74.1	58	25.9	224	35,188	63.2	20,451	36.8	55,639
2023	123	75.9	39	24.1	162	25,296	73.9	8,956	26.1	34,252
2024	105	69.1	47	30.9	152	19,220	53.7	16,558	46.3	35,778
Subtotal	394	73.2	144	26.8	538	79,704	63.4	45,965	36.6	125,669
Small Business										
2024	250	71.2	101	28.8	351	53,451	75.1	17,757	24.9	71,208
Total	644	72.4	245	27.6	889	133,155	67.6	63,722	32.4	196,877
Source: Bank Data Due to rounding, totals may not equal 100.0% Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.										

Geographic Distribution

The geographic distribution of loans reflects overall reasonable dispersion throughout the assessment areas. CFB's reasonable performance in the Kokomo, IN MSA assessment area primarily supports this conclusion. The separate assessment area sections of this evaluation include a complete discussion of the performance for this criterion.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, reasonable penetration among businesses of different sizes and retail customers of different income levels. CFB's reasonable performance across both assessment areas supports this conclusion. The separate assessment area sections of this evaluation include a complete discussion of the performance for this criterion.

Response to Complaints

The institution 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's community development performance demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity, the need and availability of such opportunities, and historical performance in evaluating the institution's performance. The following sections provide descriptions of CFB's performance for each community development activity and the separate assessment area presentations further discuss the institution's activities.

Examiners evaluated CFB's community development performance through comparisons to two similarly situated institutions. The similarly situated institutions were evaluated using Intermediate Small Institution CRA Procedures due to asset size, operate in roughly the same geographic areas, and have similar lending foci.

Community Development Loans

CFB originated 17 community development loans totaling \$9.0 million within the assessment areas during the evaluation period. The institution's level of community development lending increased significantly from the previous evaluation period, when CFB originated four community development loans totaling \$913,700 that were unrelated to the COVID-19 era Paycheck Protection Program. CFB's community development lending during the evaluation period represented 1.5 percent of average total loans and 1.3 percent of average total assets. Though this performance trailed that of the two similarly situated institutions, the performance was a notable improvement from the previous evaluation period, and the loans addressed identified community development needs. At the previous evaluation, CFB's level of community development lending represented 0.2 percent of total assets and 0.2 percent of net loans. The following table presents the institution's community development lending by

year and purpose. The separate assessment area sections later in this evaluation include additional details.

Community Development Lending - Overall										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022 (Partial)	-	-	2	664	1	15	-	-	3	679
2023	2	597	1	454	-	-	-	-	3	1,051
2024	-	-	5	3,117	6	4,128	-	-	11	7,245
2025 (YTD)	-	-	-	-	-	-	-	-	-	-
Total	2	597	8	4,235	7	4,143	-	-	17	8,975
<i>Source: Bank Data</i>										

Qualified Investments

CFB did not make any qualifying investments in the assessment areas during or prior to the evaluation period. However, its 67 donations and grants totaling \$138,355 responded to identified community development needs in the assessment areas. Additionally, during the evaluation period, the institution invested \$750,000 in a state of Indiana-sponsored fund that finances affordable housing and community economic development projects across the state. Finally, in 2023, CFB placed a \$100,000 deposit in a minority-owned deposit institution, which enabled that institution to address community development needs in the areas it serves.

In total, CFB's \$988,355 qualified investments and donations represented 11.5 percent of average total securities and 0.1 percent of average total assets. Relative to average total securities, the institution's performance exceeded that of the two similarly situated institutions. CFB's securities portfolio is small both relative to its total assets and to the securities portfolios of the similarly situated institutions. Additionally, the institution's performance during this evaluation period was a notable improvement from the previous evaluation period when CFB's 31 grants and donations totaling \$88,736 represented 2.1 percent of total securities and less than 0.1 percent of total assets.

The following table details the institution's qualified grants and donations by purpose. Refer to the separate assessment area sections of this evaluation for more information.

Qualified Investments - Overall										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Qualified Grants & Donations	2	6	64	132	0	0	1	1	67	138
Total	2	6	64	132	0	0	1	1	67	138
<i>Source: Bank Data; Review period 6/22/2022 to 4/15/2025</i>										

Community Development Services

CFB staff provided 259 instances, totaling 430 hours, of community development services across the assessment areas during the evaluation period. These services primarily provided financial expertise or technical assistance to community development organizations, and they addressed identified community development needs. Of the community development services, staff provided 15 instances, totaling 26 hours of services, to community development organizations that serve a broader statewide or regional area that includes the assessment areas. CFB's performance during this evaluation period represented a notable improvement over the previous evaluation period, when it provided 67 instances of community development services. Furthermore, the institution's performance exceeded that of the two similarly situated institutions. The following table presents community development services by purpose and hours of service. The separate assessment area sections later in this evaluation include additional details.

Community Development Services - Overall					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	# hours	# hours	# hours	# hours	# hours
2022 (Partial)	12	58	31	-	101
2023	6	103	48	11	168
2024	-	129	10	7	146
2025 (YTD)	-	13	1	1	15
Total	18	303	90	19	430
Source: Bank Data					

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners reviewed the institution's compliance with the laws relating to discrimination and other illegal credit practices, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

KOKOMO, INDIANA METROPOLITAN STATISTICAL AREA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN KOKOMO, INDIANA MSA ASSESSMENT AREA

The Kokomo, IN MSA assessment area includes Howard County in its entirety. CFB operates its main office and two branch offices in the assessment area, all within the city of Kokomo. The main office is in a moderate-income census tract, one branch office is in a low-income tract, and one branch office is in a middle-income tract.

Economic and Demographic Data

The assessment area contains 21 census tracts. According to 2020 U.S. Census data, these tracts reflect the following income designations: one low-income tract, five moderate-income tracts, nine middle-income tracts, and six upper-income tracts.

The low- and moderate-income census tracts are generally located in and around the city of Kokomo. The following table details select economic and demographic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	4.8	23.8	42.9	28.6	0.0
Population by Geography	83,658	4.3	21.6	40.8	33.3	0.0
Housing Units by Geography	39,662	5.2	22.1	43.9	28.9	0.0
Owner-Occupied Units by Geography	24,980	2.3	18.2	42.6	36.9	0.0
Occupied Rental Units by Geography	9,652	10.3	25.0	50.7	14.0	0.0
Vacant Units by Geography	5,030	10.0	35.4	37.0	17.6	0.0
Businesses by Geography	7,393	7.4	20.4	42.4	29.8	0.0
Farms by Geography	415	1.2	8.9	25.8	64.1	0.0
Family Distribution by Income Level	22,017	20.1	16.8	22.5	40.6	0.0
Household Distribution by Income Level	34,632	22.9	16.9	19.5	40.7	0.0
Median Family Income MSA - 29020 Kokomo, IN MSA		\$69,896	Median Housing Value			\$112,161
			Median Gross Rent			\$724
			Families Below Poverty Level			9.6%
Source: 2020 U.S. Census and 2024 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Within the assessment area, service businesses comprise the largest industry sector at 34.6 percent; followed by retail trade at 12.1 percent; finance, real estate, and insurance at 10.1 percent; and construction at 5.7 percent. Approximately 61.9 percent of area businesses have four or fewer employees, and 90.6 percent operate from a single location. Major employers in Howard County include Chrysler, UAW, Community Howard Regional Health, Haynes

International Manufacturing, and Meijer.

Data obtained from the Federal Reserve Bank of St. Louis indicates that the 2022 year-end unemployment rate was 4.5 percent in Howard County. Unemployment levels in the assessment area exceeded the state and national averages during the review period, as detailed in the following table.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Howard County	4.5	7.0	7.7
State of Indiana	3.3	3.7	4.4
National Average	3.5	3.8	4.1
Source: Federal Reserve Bank of St. Louis			

Examiners use the FFIEC-adjusted median family income levels to analyze home mortgage lending performance under the Borrower Profile criterion. The following table details the median family income ranges for 2023.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2023 (\$81,600)	<\$40,800	\$40,800 to <\$65,280	\$65,280 to <\$97,920	≥\$97,920
Source: FFIEC				

Competition

The assessment area is a moderately competitive market for financial services. According to FDIC Deposit Market Share Data as of June 30, 2024, eight FDIC-insured institutions operated a total of 20 banking offices in the assessment area. Of these institutions, CFB ranked first with a 30.1 percent deposit market share. CFB’s three banking offices accounted for 15.0 percent of FDIC- insured bank locations within the assessment area. The five most prominent institutions accounted for 91.0 percent of total deposit market share. Additional competition comes from credit unions that also operate within the assessment area.

The institution is not required to collect or report its small business lending data and has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons to aggregate lending data. The aggregate lending data, however, reflects the level of competition for small business loans. Aggregate lending data for 2023, the most recent year for which such data is available, shows 47 institutions originated a total of 831 small business loans in the assessment area, indicating a moderate level of competition. The five most prominent small business lenders accounted for 71.5 percent of total market share.

There is a high level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders in the assessment area. In 2023, 170 lenders originated or purchased a total of 1,913 home mortgage loans in the assessment area. CFB ranked seventh in this group of lenders with a market share of 4.3 percent. The five most prominent home mortgage lenders accounted for 31.9 percent of total market share.

Community Contacts

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available.

Examiners interviewed a representative of an economic development organization that serves the assessment area. The contact stated that the area's economy is actively diversifying beyond manufacturing but that manufacturing, automobile manufacturing in particular, remains the foundation of the assessment area's economy. The contact further stated that sports tourism has been a key driver in expanding the service industry in the assessment area and that growth in the service sector is a key driver of recent residential growth.

Finally, the contact stated that financing for small businesses is a credit need and essential to continued economic development and residential growth in the assessment area.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that home mortgage and small business lending represent primary credit needs in the assessment area. While the contact did not identify any major unmet needs, opportunities remain in the assessment area for banks to facilitate affordable housing, community services, economic development, and revitalization and stabilization of low- and moderate-income areas. These opportunities are evidenced by the significant percentage of small businesses (94.0 percent of assessment area businesses), the unemployment levels in the assessment area that are larger than the statewide and national levels, and the percentage of assessment area families that are either low- or moderate-income (36.9 percent).

CONCLUSIONS ON PERFORMANCE CRITERIA IN KOKOMO, INDIANA MSA ASSESSMENT AREA

LENDING TEST

CFB demonstrated reasonable performance in this assessment area under the Lending Test. Geographic distribution and borrower profile performance supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment

area. The bank's reasonable performance in both small business and home mortgage lending supports this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion within the assessment area. As detailed in the following table, CFB's small business lending performance in both the low- and moderate-income tracts slightly exceeded the percentage of businesses.

Geographic Distribution of Small Business Loans (2024)					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	7.4	12	10.7	1,414	7.3
Moderate	20.4	25	22.3	5,560	28.5
Middle	42.4	35	31.2	7,107	36.5
Upper	29.8	40	35.7	5,406	27.7
Totals	100.0	112	100.0	19,487	100.0
Source: 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion within the assessment area. As detailed in the following table, in 2023, the institution's performance in the low- income tract exceeded the aggregate performance level, whereas its performance in the moderate- income tracts slightly trailed the aggregate performance level.

Geographic Distribution of Home Mortgage Loans (2023)						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	2.3	3.9	7	8.4	970	7.9
Moderate	18.2	20.3	13	15.7	1,389	11.3
Middle	42.6	42.0	31	37.3	4,001	32.4
Upper	36.9	33.8	32	38.6	5,972	48.4
Totals	100.0	100.0	83	100.0	12,333	100.0
Source: 2020 U.S. Census; Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different sizes and individuals of different income levels in the assessment area. CFB's reasonable performance in both small business and home mortgage lending primarily supports this conclusion.

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. As shown in the following table, the bank's lending performance to businesses with gross annual revenues of \$1.0 million or less slightly exceeded the percentage of businesses in 2024.

Distribution of Small Business Loans by Gross Annual Revenue Category (2024)					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	87.4	102	91.1	17,333	88.9
>\$1,000,000	2.7	0	0.0	0	0.0
Revenue Not Available	9.9	10	8.9	2,154	11.1
Total	100.0	112	100.0	19,487	100.0
Source: 2024 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%					

Home Mortgage Loans

The distribution of borrowers, reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels. As shown in the following table, CFB's lending performance to both low- and moderate-income borrowers trailed the aggregate performance levels in 2023. However, in 2022, the institution's lending performance to low- income borrowers was consistent with the aggregate performance level, and its lending to moderate- income borrowers slightly trailed the aggregate performance while being consistent with the percentage of families. In 2024, the bank's lending performance to low-income borrowers improved by 4.8 percentage points over 2023, and its lending to moderate-income borrowers improved by 3.4 percentage points over 2023.

Distribution of Home Mortgage Loans by Borrower Income Level (2023)						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	20.1	13.4	7	8.4	478	3.9
Moderate	16.8	24.0	7	8.4	745	6.0
Middle	22.5	24.6	10	12.0	859	7.0
Upper	40.6	23.8	39	47.0	6,714	54.4
Not Available	0.0	14.1	20	24.1	3,537	28.7
Totals	100.0	100.0	83	100.0	12,332	100.0
Source: 2020 U.S. Census; Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.						

COMMUNITY DEVELOPMENT TEST

CFB demonstrated adequate responsiveness to the community development needs of the

assessment area through community development loans, qualified investments, and community development services. Examiners considered the institution’s capacity and the need and availability of such opportunities.

Community Development Loans

CFB originated 12 community development loans totaling approximately \$5.4 million during the evaluation period in this assessment area. The following table summarizes the institution’s community development lending in the assessment area during the evaluation period.

Community Development Lending										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022 (Partial)	-	-	2	664	1	15	-	-	3	679
2023	1	484	1	454	-	-	-	-	2	938
2024	-	-	4	2,653	3	1,165	-	-	7	3,818
2025 (YTD)	-	-	-	-	-	-	-	-	-	-
Total	1	484	7	3,771	4	1,180	-	-	12	5,435

Source: Bank Data

The following includes notable examples of CFB’s community development loans:

- Between 2022 and 2024, the institution originated three loans totaling \$574,550 to a community development organization that provides rehabilitation services to intellectually and developmentally challenged residents of the assessment area.
- In 2024, the bank originated a \$2.2 million loan that facilitated the development of a drug addiction recovery center in the assessment area.

Qualified Investments

CFB did not make any qualifying investments in the assessment area during the evaluation period. However, it made 48 grants and donations in the assessment area during the evaluation period that addressed identified community development needs. The following table summarizes the institution’s donations by year and purpose.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Qualified Grants & Donations	2	6	46	113	0	0	0	0	48	119
Total	2	6	46	113	0	0	0	0	48	119

Source: Bank Data; Review period 6/22/2022 to 4/15/2025

The following includes notable examples of qualified grants and donations:

- In 2023, CFB donated \$20,350 to an organization that provides academic tutoring services to low- and moderate-income youth in the assessment area.
- In 2025, the institution donated \$30,000 to an organization that facilitated workforce development for low- and moderate-income workers in the assessment area.

Community Development Services

CFB staff provided 349 hours of community development services in the assessment area during the evaluation period. The following table details the bank's community development services by year and purpose.

Community Development Services					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	# hours	# hours	# hours	# hours	# hours
2022 (Partial)	12	55	19	-	86
2023	6	84	36	11	137
2024	-	95	9	7	111
2025 (YTD)	-	13	1	1	15
Total	18	247	65	19	349
<i>Source: Bank Data</i>					

The following includes notable examples of these services:

- Between 2022 and 2023, three CFB employees provided a total of 14 hours of service as either directors or committee members of an organization that provides affordable housing for low- and moderate-income residents of the assessment area.
- Between 2022 and 2025, five institution employees provided a total of 48 hours of service to an organization that facilitates the delivery of community services to low- and moderate- income youth in the assessment area.
- Between 2022 and 2025, nine institution employees provided a total of 82 hours of service to an economic development organization that facilitates job and business growth within the assessment area.

INDIANAPOLIS, INDIANA METROPOLITAN STATISTICAL AREA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN INDIANAPOLIS, INDIANA MSA ASSESSMENT AREA

The Indianapolis, IN MSA assessment area includes Hamilton and Marion counties in their entirety. CFB operates five branch offices in this assessment area. Of the branch offices, two are in Westfield, and the cities of Indianapolis, Fishers, and Noblesville have one branch office each. The branch offices in Westfield operate within middle-income tracts, and the Fishers, Indianapolis, and Noblesville offices are in upper-income tracts. CFB’s branch office on the far northside of the city of Indianapolis is the only location in Marion County. All other branch office locations are within Hamilton County. The Indianapolis branch office opened in February 2022, at which time CFB delineated Marion County as part of its assessment area. Consequently, this is the first evaluation that includes Marion County in CFB’s assessment area delineation for the entirety of the evaluation period. The institution opened its Fishers branch office in February 2024.

Economic and Demographic Data

The assessment area contains 310 census tracts in total. According to 2020 U.S. Census data, Hamilton County is comprised of 57 census tracts that reflect the following designations:

- 19 middle-income tracts
- 38 upper-income tracts

Marion County is comprised of 253 census tracts that reflect the following designations, according to 2020 U.S. Census data:

- 50 low-income tracts
- 80 moderate-income tracts
- 68 middle-income tracts
- 47 upper-income tracts
- eight census tracts for which income was not designated

The following table details select economic and demographic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	310	16.1	25.8	28.1	27.4	2.6

Population by Geography	1,324,670	11.5	23.9	28.9	33.7	1.9
Housing Units by Geography	554,284	13.1	24.7	29.2	30.9	2.0
Owner-Occupied Units by Geography	300,461	6.9	18.0	31.8	41.9	1.5
Occupied Rental Units by Geography	200,300	19.1	32.7	26.9	18.5	2.7
Vacant Units by Geography	53,523	25.7	32.4	23.2	16.0	2.6
Businesses by Geography	232,036	10.6	20.6	28.3	36.3	4.1
Farms by Geography	4,279	9.2	20.3	32.8	35.4	2.2
Family Distribution by Income Level	299,433	22.6	17.7	19.1	40.6	0.0
Household Distribution by Income Level	500,761	25.3	17.2	18.1	39.4	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Greenwood, IN MSA		\$80,333	Median Housing Value			\$181,673
			Median Gross Rent			\$969
			Families Below Poverty Level			9.1%
Source: 2020 U.S. Census and 2024 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Within the assessment area, service businesses comprise the largest industry sector at 31.9 percent; followed by finance, real estate, and insurance at 11.1 percent; retail trade at 7.8 percent; and construction at 5.5 percent. Approximately 56.6 percent of area businesses have four or fewer employees, and 94.6 percent operate from a single location. Major employers in Marion County include Indiana University Health, Ascension St. Vincent, and Eli Lilly & Co. Major employers in Hamilton County include CNO Financial Group, RCI LLC, Navient Corp., and Roche Diagnostics.

Data obtained from the Federal Reserve Bank of St. Louis indicates that the 2022 year-end unemployment rate was 1.9 percent in Hamilton County and 2.7 percent in Marion County. Unemployment levels in the assessment area trailed state and national averages during the review period, as detailed in the following table.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Hamilton County	1.9	2.4	3.0
Marion County	2.7	3.2	4.0
State of Indiana	3.3	3.7	4.4
National Average	3.5	3.8	4.1
<i>Source: Federal Reserve Bank of St. Louis</i>			

Examiners use the FFIEC-adjusted median family income levels to analyze home mortgage lending performance under the Borrower Profile criterion. The following table details the median family income ranges for 2023.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2023 (\$97,300)	<\$48,650	\$48,650 to <\$77,840	\$77,840 to <\$116,760	≥\$116,760
Source: FFIEC				

Competition

The assessment area is a very competitive market for financial services. According to FDIC Deposit Market Share Data as of June 30, 2024, 34 FDIC-insured institutions operated a total of 287 banking offices in the assessment area. Of these institutions, CFB ranked 24th with a 0.2 percent deposit market share. CFB's five banking offices accounted for 1.7 percent of FDIC-insured bank locations within the assessment area. The five most prominent institutions accounted for 63.4 percent of total deposit market share. Additional competition comes from credit unions that also operate within the assessment area.

The institution is not required to collect or report its small business lending data and has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons to aggregate lending data. The aggregate lending data, however, reflects the level of competition for small business loans. Aggregate lending data for 2023, the most recent year for which such data is available, shows 143 institutions originated a total of 29,322 small business loans in the assessment area, indicating a moderate level of competition. The five most prominent small business lenders accounted for 66.1 percent of total market share.

There is a high level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders in the assessment area. In 2023, 550 lenders originated or purchased a total of 29,313 home mortgage loans in the assessment area. CFB ranked 98th out of this group of lenders with a market share of 0.1 percent. The five most prominent home mortgage lenders, accounted for 19.2 percent of total market share.

Community Contacts

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available.

Examiners interviewed a senior manager that specializes in small business development for a city government in the assessment area. The contact stated that housing affordability is a growing problem impacted by housing supply and construction labor shortages, as well as

macroeconomic conditions.

Additionally, the contact stated that financing for small businesses is becoming more difficult to obtain due to the rapid growth in the number of small businesses in the assessment area. The contact further noted that the Indianapolis metropolitan area has been one of the fastest growing markets for small businesses over the previous five years.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that home mortgage and small business lending represent primary credit needs in the assessment area. While the contact did not identify any major unmet needs, opportunities remain in the assessment area for banks to facilitate affordable housing, community services, economic development, and revitalization and stabilization of low- and moderate-income areas. These opportunities are primarily within Marion County, which includes the city of Indianapolis. Marion County includes all of the low- and moderate-income tracts in the assessment area, and 48.8 percent of Marion County families are either low- or moderate-income. Community development opportunities are notably less present in Hamilton County, which includes no low- or moderate-income tracts, and 21.1 percent of Hamilton County families are either low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN INDIANAPOLIS, INDIANA MSA ASSESSMENT AREA

LENDING TEST

CFB demonstrated reasonable performance in this assessment area under the Lending Test. Borrower profile performance primarily supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects overall poor dispersion throughout the assessment area. The bank's poor performance in small business lending primarily supports this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects poor dispersion within the assessment area. As detailed in the following table, CFB's small business lending performance in the low-income tracts slightly trailed the percentage of businesses, and its performance in the moderate-income tracts trailed the percentage of businesses.

Geographic Distribution of Small Business Loans (2024)					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	10.6	9	6.5	2,022	6.0

Moderate	20.6	13	9.4	2,391	7.0
Middle	28.3	48	34.8	11,442	33.7
Upper	36.3	66	47.8	17,879	52.6
Not Available	4.1	2	1.4	230	0.7
Totals	100.0	138	100.0	33,964	100.0
Source: 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects overall reasonable dispersion within the assessment area. As detailed in the following table, in 2023, the institution's performance in the low- income tracts slightly exceeded both the aggregate performance level and the percentage of owner- occupied housing units. Within the moderate-income tracts in 2023, CFB's performance significantly trailed the aggregate performance. The institution's performance in the low-income tracts, therefore, primarily supports the overall reasonable dispersion conclusion.

Geographic Distribution of Home Mortgage Loans (2023)						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	7.3	8.4	4	10.0	469	3.6
Moderate	19.1	18.8	1	2.5	196	1.5
Middle	32.1	34.4	13	32.5	3,748	28.9
Upper	40.0	37.0	22	55.0	8,550	66.0
Not Available	1.5	1.4	0	0.0	0	0.0
Totals	100.0	100.0	40	100.0	12,963	100.0
Source: 2023 ACS; 2020 U.S. Census; Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Borrower Profile

The distribution of borrowers reflects reasonable penetration overall among individuals of different income levels and businesses of different sizes in the assessment area. CFB's reasonable performance in small business lending primarily supports this conclusion.

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. As shown in the following table, the bank's lending performance to businesses with gross annual revenues of \$1.0 million or less slightly exceeded the percentage of businesses in 2024.

Distribution of Small Business Loans by Gross Annual Revenue Category (2024)					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	92.3	133	96.4	32,663	96.2
>\$1,000,000	2.5	0	0.0	0	0.0
Revenue Not Available	5.2	5	3.6	1,301	3.8
Total	100.0	138	100.0	33,964	100.0
Source: 2024 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%					

Home Mortgage Loans

The distribution of borrowers, reflects, given the demographics of the assessment area, poor penetration among individuals of different income levels. As shown in the following table, CFB's lending performance to both low- and moderate-income borrowers trailed the aggregate performance level in 2023.

Distribution of Home Mortgage Loans by Borrower Income Level (2023)						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	22.8	9.8	1	2.5	62	0.5
Moderate	17.8	20.8	5	12.5	818	6.3
Middle	19.2	19.9	4	10.0	1,117	8.6
Upper	40.2	33.2	24	60.0	9,633	74.3
Not Available	0.0	16.4	6	15.0	1,333	10.3
Totals	100.0	100.0	40	100.0	12,963	100.0
Source: 2020 U.S. Census; Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

COMMUNITY DEVELOPMENT TEST

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

Community Development Loans

CFB originated five community development loans totaling approximately \$3.5 million during the evaluation period in this assessment area. The following table summarizes the institution's community development lending in the assessment area during the evaluation period.

Community Development Lending										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022 (Partial)	-	-	-	-	-	-	-	-	-	-
2023	1	113	-	-	-	-	-	-	1	113
2024	-	-	1	464	3	2,963	-	-	4	3,427
2025 (YTD)	-	-	-	-	-	-	-	-	-	-
Total	1	113	1	464	3	2,963	-	-	5	3,540
<i>Source: Bank Data</i>										

The following includes notable examples of CFB's community development loans:

- In 2024, the institution originated a \$464,000 loan to a church that operates a community center and daycare that serves low- and moderate-income residents.
- In 2024, the bank originated a \$112,500 loan that facilitated the opening of a new business that created jobs for low- and moderate-income residents of the assessment area.

Qualified Investments

CFB did not make any qualifying investments in the assessment area during the evaluation period. However, it made 19 grants and donations in the assessment area during the evaluation period that addressed identified community development needs. The following table summarizes the institution's donations by year and purpose.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Qualified Grants & Donations	0	0	18	19	0	0	1	1	19	20
Total	0	0	18	19	0	0	1	1	19	20
<i>Source: Bank Data; Review period 6/22/2022 to 4/15/2025</i>										

The following includes notable examples of qualified grants and donations:

- Between 2023 and 2024, CFB donated a total of \$4,000 to an organization that provides community services, including transportation, to low- and moderate-income senior citizens in the assessment area.

- In 2024, the institution donated \$1,500 to an organization that provides college scholarships to low- and moderate-income high school students in the assessment area.

Community Development Services

CFB staff provided 55 hours of community development services in the assessment area during the evaluation period. The following table details the bank's community development services by year and purpose.

Community Development Services					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	# hours	# hours	# hours	# hours	# hours
2022 (Partial)	-	3	-	-	3
2023	-	19	-	-	19
2024	-	33	-	-	33
2025 (YTD)	-	-	-	-	-
Total	-	55	-	-	55
<i>Source: Bank Data</i>					

The following includes notable examples of these services:

- Between 2023 and 2024, a CFB employee provided 11 hours of service to an organization that provides community services, including transportation, to low- and moderate-income senior citizens in the assessment area.
- In 2023, an institution employee served 12 hours as a director of an organization that provides community services to at-risk youth in the assessment area.

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

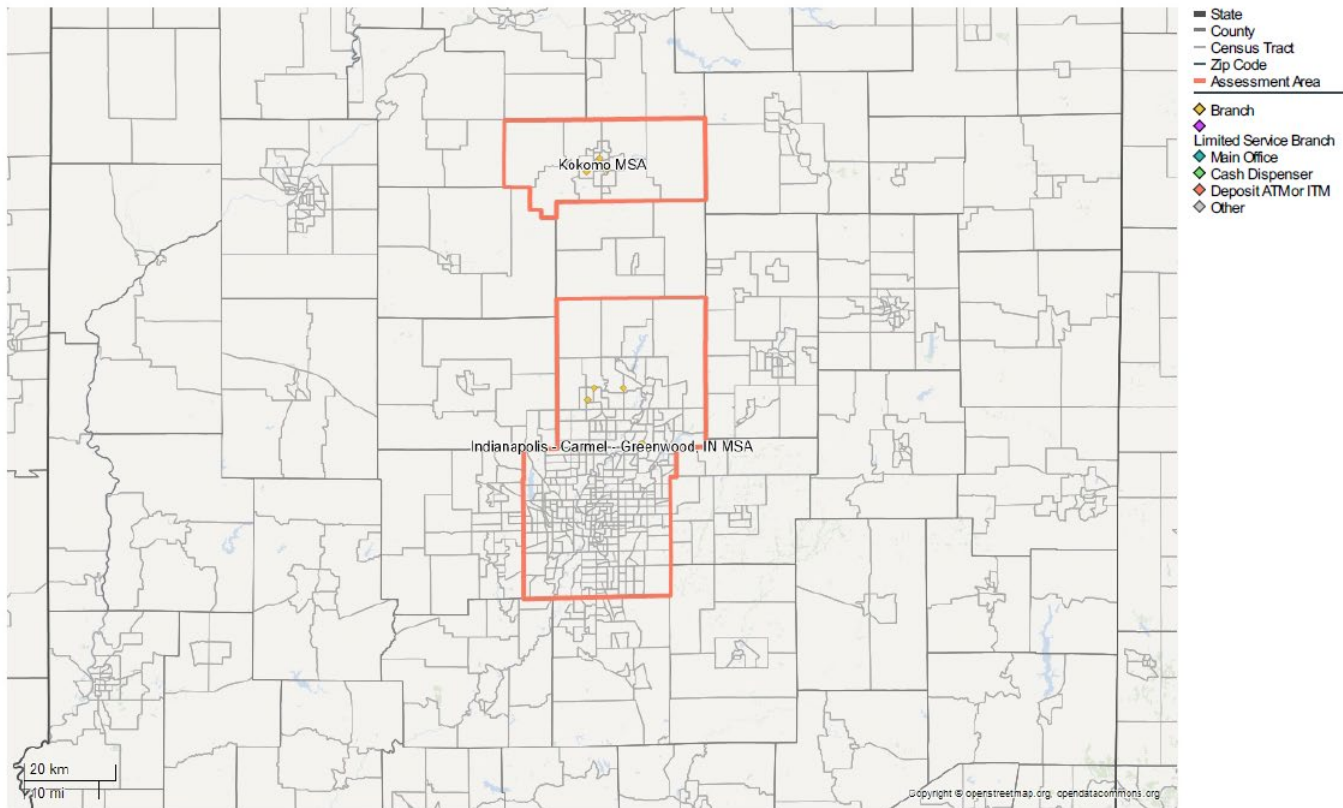
Howard County (Kokomo MSA)

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	9	101
3	10	102.01
4	11	102.02
5	12	103
6	13	104
7	14	105
8	15	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	3103.09	3203.03
3101.05	3103.1	3203.05
3101.06	3103.11	3203.06
3101.08	3103.12	3204
3101.1	3201.05	3205
3101.11	3201.06	3206
3101.12	3201.07	3207
3101.13	3201.08	3208
3102.01	3201.09	3209.01
3102.03	3202.02	3209.02
3102.04	3202.03	3209.03
3103.05	3202.05	3210.01
3103.06	3202.06	3210.02
3103.08	3203.01	3211

3212	3401.15
3213	3402.01
3214	3402.02
3216	3403.01
3217	3403.02
3218	3404
3219	3405
3220	3406
3221	3407
3222	3408
3223	
3224	
3225	
3226.01	
3226.02	
3227	
3301.03	
3301.05	
3301.06	
3301.07	
3301.08	
3301.09	
3302.03	
3302.04	
3302.06	
3302.08	
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	

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.

2.3 Loan-to-Deposit Ratios

2024	
First Quarter	95.41%
Second Quarter	95.70%
Third Quarter	95.91%
Fourth Quarter	96.30%