



## **PUBLIC DISCLOSURE**

July 18, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Fifth Third Bank, National Association  
Charter Number: 25190

38 Fountain Square Plaza  
Cincinnati, OH 45202

Office of the Comptroller of the Currency

Large Bank Supervision  
Constitution Center  
400 7th Street, S.W.  
Washington, DC 20219

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

## Contents

Overall CRA Rating.....	3
Description of Institution .....	4
Scope of the Evaluation .....	4
Discriminatory or Other Illegal Credit Practices Review .....	9
Multistate Metropolitan/Combined Statistical Area Ratings .....	10
Charleston-Huntington-Ashland, WV-OH-KY (Charleston) CSA .....	10
Chicago-Naperville, IL-IN-WI (Chicago) CSA .....	18
Cincinnati-Wilmington-Maysville, OH-KY-IN (Cincinnati) CSA .....	27
Evansville, IN-KY (Evansville) MMSA .....	36
Louisville/Jefferson County, KY-IN (Louisville) MMSA .....	45
South Bend-Elkhart-Mishawaka, IN-MI (South Bend) CSA.....	53
State Ratings .....	61
State of Florida.....	61
State of Georgia .....	71
State of Illinois.....	80
State of Indiana .....	89
State of Kentucky.....	99
State of Michigan.....	109
State of North Carolina .....	120
State of Ohio .....	130
State of South Carolina .....	140
State of Tennessee.....	147
Appendix A: Scope of Examination .....	A-1
Appendix B: Summary of MMSA and State Ratings .....	B-1
Appendix C: Definitions and Common Abbreviations .....	C-1
Appendix D: Tables of Performance Data .....	D-1

## Overall CRA Rating

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

The following table indicates the performance level of Fifth Third Bank, National Association with respect to the Lending, Investment, and Service Tests:

Performance Levels	Fifth Third Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on excellent performance in 13 of the 16 rating areas, good performance in two rating areas, and adequate performance in one rating area.
- The Investment Test rating is based on excellent performance in 12 of the 16 rating areas, good performance in one rating area, adequate performance in two rating areas, and poor performance in one rating area.
- The Service Test rating is based on excellent performance in 10 of the 16 rating areas, good performance in five rating areas, and adequate performance in one rating area.

### Lending in Assessment Area

A high percentage of the bank's loans were in its assessment areas (AAs).

The bank originated and purchased 81 percent of its total loans inside its AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This factored favorably into the geographic distribution of lending by income level of the geography.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	266,531	76.3	82,914	23.7	349,445	46,150,789	64.1	25,894,467	35.9	72,045,255
Small Business	115,493	94.6	6,561	5.4	122,054	12,339,337	89.7	1,418,054	10.3	13,757,391
Small Farm	980	91.1	96	8.9	1,076	53,681	88.5	6,975	11.5	60,656
Total	383,004	81.0	89,571	19.0	472,575	58,543,807	68.2	27,319,496	31.8	85,863,302

## Description of Institution

Fifth Third Bank, National Association (FTB, bank, or institution) is an interstate bank headquartered in Cincinnati, Ohio and owned by Fifth Third Bancorp. Fifth Third Bancorp is a diversified financial services company, also headquartered in Cincinnati. As of December 31, 2021, FTB had \$209.7 billion in assets, ranking it as the 13<sup>th</sup> largest U.S. commercial bank, with \$176.3 billion in deposits and \$16.7 billion in tier 1 capital.

As of December 31, 2021, FTB had a network of 1,117 branch office locations and 2,320 automated teller machines (1,649 deposit-taking ATMs) in 11 states that included Florida, Georgia, Illinois, Indiana, Kentucky, Michigan, North Carolina, Ohio, South Carolina, Tennessee, and West Virginia.

Fifth Third Community Development Company, LLC (FTCDC) is a holding company nonbank subsidiary organized primarily for making investments in small business investment companies (SBIC), other qualifying business ventures, and affordable housing tax credit investments. FTCDC is a primary contributor to FTB's investment test under CRA.

Fifth Third Foundation is part of the Foundation Office within FTB. Established in 1948, Fifth Third Foundation was one of the first charitable foundations created by a financial institution. It supports worthy causes in the areas of health and human services, education, community development, and the arts in the states where FTB operates.

On March 22, 2019, FTB completed an acquisition of MB Financial, Inc., a Chicago-based holding company for MB Financial Bank, National Association (MB Financial Bank), which had approximately \$20 billion in assets. MB Financial Bank was regulated by the OCC and received an "Outstanding" rating on its last CRA evaluation dated January 17, 2017.

Fifth Third Bank converted from an Ohio state-chartered bank to a national bank on November 14, 2019. Its prior CRA evaluation was conducted by the Federal Reserve Bank of Cleveland as of November 28, 2016, and the bank was rated "Outstanding."

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC evaluated home mortgage loans, small loans to businesses and farms, community development (CD) loans, qualified investments, and retail and CD services from January 1, 2017, to December 31, 2021, except for the state of South Carolina, which was evaluated from January 1, 2021, to December 31, 2021. FTB did not branch into South Carolina until September 2020. Examiners did not consider consumer loans in this evaluation, as consumer lending did not constitute a substantial majority of the bank's business and management did not request consideration. Qualifying activities performed in response to the significant impact of the coronavirus pandemic (COVID-19) across the United States were also considered in this evaluation.

Generally, the OCC considers CRA evaluation periods to begin on the conversion date to a national bank charter. However, to ensure that the OCC considered all CRA activities, examiners used a CRA evaluation period start date that went back to the end date of the previous CRA evaluation period, without regard to the charter conversion date.

### Lending Test

The OCC evaluated home mortgage and small loans to businesses in each AA. In most markets, FTB made few, if any, small loans to farms as farm lending is not a primary product for the bank. Some of the bank's AAs that contain more rural geographies had sufficient small loans to farms to analyze. The OCC determined that 20 loans originated within an AA was sufficient for analysis purposes. Due to the limited number of farms in low- and moderate-income geographies, small farm lending had no material impact on the Lending Test conclusions. If examiners included an analysis of these loans in a rating area, they noted it in the narrative for the applicable rating area. Tables related to small loans to farms where the bank had no lending (state of South Carolina) were removed from appendix D.

The OCC determined lending activity responsiveness in each AA by comparing the bank's market rank percentage for deposits to each lending product market rank percentage. Examiners divided the bank's market rank by the total number of depository institutions or lenders, respectively. This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage, small business, and small farm lenders within the AA.

The OCC generally gave equal weighting to geographic and borrower distribution components of the Lending Test. When evaluating the geographic distribution of loans, the OCC gave greater weight to FTB's performance in moderate-income tracts in instances where there were a limited number of owner-occupied housing units or businesses in the low-income tracts. When evaluating the distribution of home mortgage loans based on the income level of the borrower, the OCC considered the poverty level of the AA as well as the significant affordability barriers that exist in many of FTB's markets. The OCC also considered the volume of CD loans and the degree of responsiveness of those loans to the needs in the community.

### Investment Test

The OCC gave equal consideration to the volume of investments and grants made during the current evaluation period and those made in prior evaluation periods that remained outstanding. The OCC also considered how responsive the investments were to the needs of the communities. In most AAs, the investments were considered non-complex. FTB used low-income housing tax credits (LIHTC) in many AAs.

### Service Test

The OCC gave primary consideration to FTB's performance in delivering retail products and services to geographies and individuals of different income levels through FTB's distribution of branches. The OCC focused on branches in low- and moderate-income geographies. The OCC evaluated the range of products and services offered by FTB through its branch network with emphasis on accessibility to low- and moderate-income borrowers. Products and services offered are consistent throughout the branch network. The OCC specifically focused on any differences in branch hours and services in low- and moderate-income geographies compared to those in middle- and upper- income geographies. FTB offers a wide range of traditional deposit and banking products and services. While the bank offers multiple alternative delivery systems commensurate with standard industry offerings including ATMs, telephone and online banking, electronic bill-pay, remote deposit capture, and mobile banking options, examiners did not consider these systems as there was insufficient data to determine their effectiveness in targeting low- and moderate-income individuals or geographies. The OCC evaluated the level of retail services provided to low- and moderate-income borrowers through bank-provided analysis. Examiners evaluated FTB's record of providing CD services. The OCC's primary consideration was the responsiveness of the services to the needs of the community. The OCC gave the most consideration to CD services that addressed critical needs or were most impactful to the AA.

In the full-scope AAs, examiners considered branches located in middle- and upper income geographies that served and improved access for low- and moderate-income customers or customers in low- and moderate-income geographies in one of two ways. Examiners gave positive consideration when a middle- and upper income branch was “across the street” (less than 1,000 feet) from a low- or moderate-income geography. Examiners also considered middle- and upper income branches that, based on documentation provided by the bank, showed that the branch served low- and moderate-income customers. Positive consideration was given if the percentage of low- and moderate-income customers (based on modeled customer income) that used a branch located in a middle- or upper-income geography exceeded 75 percent of the branch’s customer base. Consideration was given to each middle- and upper income branch only once.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank-delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank-delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank’s overall rating is a blend of the state ratings and multistate ratings.

The Cincinnati CSA, Chicago CSA, and the states of Michigan and Ohio received the greatest weight in arriving at the overall rating. Combined, these areas accounted for nearly 72 percent of the bank’s total deposits and 64 percent of lending during the evaluation period. Home mortgage lending received substantially greater weight than small loans to businesses due to home mortgage lending being a higher percentage of total lending volume. Small loans to farms accounted for less than one-half of one percent of total lending and had minimal effect on the overall rating.

The MMSA/CSA and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State and MMSA/CSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

### **Other Information**

AA – The OCC determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that FTB’s branches service and did not arbitrarily exclude any low- and moderate-income areas.

Deposit Market Share – The OCC used summary deposit data reported to the Federal Deposit Insurance Corporation (FDIC) as of June 30, 2021. This was the most recent public data available during the evaluation period.

Lending Market/Peer Data – Due to timing and release of data, the OCC used 2021 peer mortgage data and 2020 peer small loans to businesses and farms data reported to the Federal Financial Institutions Examination Council.

Unemployment rate – The unemployment rates referenced are the MSA non-seasonally adjusted rate as published monthly by the U.S. Bureau of Labor Statistics. In a CSA, the rate is for the MSA comprising most of the CSA.

Financial Empowerment Mobile/E-bus – The bank, after its conversion to a national bank, continued its unique partnership with The Community College Foundation to sponsor the Financial Empowerment Mobile, also known as the E-Bus. The E-Bus is a 40-foot, retrofitted vehicle staffed by FTB employees and equipped with onboard computer workstations and internet connectivity. The E-Bus travels throughout the bank’s markets to reach neighborhoods in low- and moderate-income geographies that have been traditionally underserved by banks and is occasionally used for marketing events, such as a new banking center location, or community events. During the COVID-19 pandemic, the bank conducted virtual E-Bus events.

Flexible and Innovative Lending Products – The bank’s innovative and flexible loan product offerings include both bank-developed and government-sponsored loan programs that help to meet the credit needs of low- and moderate-income borrowers. Although products provided through the federal or state governments are not necessarily innovative, the loan products provide flexibility to consumers and businesses seeking financing. A summary of FTB’s innovative and/or flexible loan products or programs offered are as follows:

53 Community Mortgage – Offers low- and moderate-income borrowers the ability to make high loan-to-value (LTV) purchase and refinance transactions. The program offers reduced lender fees and can be combined with FTB’s Down Payment Assistance (DPA) product if the subject property is in a low- and moderate-income geography.

Federal Housing Administration (FHA) – Allows for high LTV purchase and refinance transactions. The program allows for low down payment options, flexible sources for down payment, low minimum credit score and is aimed at borrowers who may not qualify for traditional financing. There are no area median income (AMI) or property location requirements.

Freddie Mac Home Possible (Freddie Mac HP) – Allows high LTV purchase and refinance transactions for borrowers whose qualifying income is at or below 80 percent of the AMI.

Freddie Mac Refi Possible (Freddie Mac RP) – Refinance option for low-income borrowers with loans currently backed by Freddie Mac. May allow borrowers, who previously could not or did not refinance, the opportunity to refinance with lower closing costs and better pricing.

Fannie Mae Home Ready (Fannie Mae HR) – Product that allows high LTV purchase and refinance transactions for borrowers at or below 80 percent of the AMI.

Fannie Mae Home Refi Now (Fannie Mae RN) – Refinance option for low-income borrowers with loans currently backed by Fannie Mae. May allow borrowers, who previously could not or did not refinance, the opportunity to refinance with lower closing costs and better pricing.

United States Department of Agriculture/Rural Housing Services (USDA/RHS) – No down payment purchase and 100 percent refinance transactions, in rural areas, for borrowers with household income below the AMI. The program requires an upfront guarantee fee that can be financed and monthly mortgage insurance.

Veterans Administration (VA) – Federal mortgage loan programs to help veterans and their families obtain home financing.

Illinois Housing Development Authority (IHDA) – Group of products (conventional, FHA, VA, USDA/RHS, et al.) permitting high LTV purchase transactions on properties at or below IHDA sales price limits and for income at or below IHDA requirements. IHDA also offers borrowers down payment and closing cost assistance.

Kentucky Housing Corporation (KHC) – Group of products (conventional, FHA, VA, USDA/RHS, et al.) permitting high LTV purchase transactions on properties at or below KHC sales price limits and for applicant income at or below KHC requirements. KHC also offers borrowers down payment and closing cost assistance.

Michigan State Housing Development Authority (MSHDA) – Group of products (FHA, VA, USDA/RHS, and MSHDA DPA) permitting high LTV purchase transactions on properties at or below MSHDA sales price limits and for borrowers with household income at or below MSHDA requirements. MSHDA also offers borrowers down payment and closing cost assistance.

Young Bankers Club (YBC) – Proprietary program targeted to elementary schools located in low- and moderate-income geographies to educate students on the importance of financial responsibility over a five- to ten-week curriculum in money management and economics. The program meets local and state educational standards for both mathematics and social studies.



## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development (HUD), and the Consumer Financial Protection Bureau, as applicable.

In April 2018, the OCC conducted a fair lending examination of MB Financial Bank and identified a violation of the Fair Housing Act (FHA). In May 2018, FTB announced its intent to acquire MB Financial Bank and closed on the transaction in March 2019. The FHA violation was attributed to practices that existed at MB Financial Bank prior to the acquisition by FTB. The violation was cited at FTB as the successor of MB Financial Bank. The institution fully remediated all borrowers identified as harmed by the practices at MB Financial Bank.

The OCC does not have additional public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The CRA performance rating was not lowered as a result of these findings. The OCC considered the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; and the extent to which the institution took corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Multistate Metropolitan/Combined Statistical Area Ratings

### Charleston-Huntington-Ashland, WV-OH-KY (Charleston) CSA

**CRA rating for the Charleston CSA<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and overall borrower distributions of the bank's originations and purchases of home mortgage loans and small loans to businesses were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

### Description of Institution's Operations in the Charleston CSA

FTB delineated a portion of the Charleston CSA as its AA. Refer to the table in appendix A for a list of counties reviewed.

The Charleston CSA was FTB's 14th largest rating area based on total deposits. The bank had approximately \$602 million in deposits, representing 0.4 percent of the bank's total deposits. The area is served by 25 FDIC-insured banks operating 141 branches. FTB ranked seventh with 4.5 percent deposit market share. The top three banks and their deposit market share include Truist Bank (21.5 percent), United Bank (12.8 percent), and City National Bank of West Virginia (12.2 percent). FTB operated eight branches and 13 ATMs. During the evaluation period, the bank made \$313.9 million, or 0.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Charleston CSA

The following table provides a summary of the demographics, including housing, business, and economic information for the Charleston CSA AA.

---

<sup>1</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Charleston CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	136	6.6	24.3	43.4	25.0	0.7
Population by Geography	512,634	4.2	17.0	49.9	28.3	0.5
Housing Units by Geography	237,567	5.1	17.6	49.4	27.6	0.2
Owner-Occupied Units by Geography	146,351	2.2	14.3	52.2	31.2	0.0
Occupied Rental Units by Geography	63,353	10.2	23.1	43.4	22.6	0.8
Vacant Units by Geography	27,863	8.7	22.8	48.3	20.0	0.3
Businesses by Geography	35,544	8.3	14.9	46.3	30.2	0.3
Farms by Geography	864	3.9	13.0	52.0	31.1	0.0
Family Distribution by Income Level	132,657	22.5	16.6	19.5	41.4	0.0
Household Distribution by Income Level	209,704	26.6	15.2	16.7	41.5	0.0
Median Family Income MSA - 16620 Charleston, WV MSA		\$54,658		Median Housing Value		\$109,564
Median Family Income MSA - 26580 Huntington-Ashland, WV-KY-OH MSA		\$54,584		Median Gross Rent		\$645
Median Family Income Non-MSAs - OH		\$55,785		Families Below Poverty Level		13.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$27,893 and moderate-income families earned less than \$44,622. The median housing value in the AA is \$109,564. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$697 for a low-income borrower and \$1,116 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$558. Some low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 13.6 percent of families were living below the poverty level.

### **Economic Data**

According to Moody's Analytics, the economy is growing, but underperforming both the region and nation. The lack of viable growth drivers is expected to deepen out-migration in future years. The pace of economic recovery is expected to be slower than the national average. Some of the area's strengths are low cost of living,

location and transportation linkages, and below average employment volatility. Exposures to a declining coal industry and a declining population are challenges. Despite economic challenges, housing prices and permits are increasing. Education and health services, government, retail trade, and professional and business services are important economic drivers. The largest employers are King's Daughters Medical Center, Cabell Huntington Hospital, St. Mary's Medical Center, Marshall University, and Marathon Petroleum.

The unemployment rate for the CSA was 6.9 percent as of January 2017. Unemployment levels significantly increased from 5.9 percent in March 2020 to 16.7 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the CSA was 3.3 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

As part of the CRA evaluation, the OCC reviewed information from three community contacts made during the evaluation period within the CSA to better understand area credit and community needs. Contacts worked for organizations associated with small business development, affordable housing, and the creation and retention of jobs. Contacts expressed the historic importance of the energy industry in the CSA. The area has shifted away from coal mining, but high demand remains for metallurgical products. The abundance of shale and natural gas in the area has propelled manufacturing. The relatively low cost of living paired with under-utilized commercial real estate makes this area an attractive location for investment. The CSA has attracted, with some level of success, businesses in automotive supplies, air/space components, and airplane maintenance and repair. Contacts indicated the needs in the CSA are:

- Financing to small businesses, including start-ups.
- Loans for the rehabilitation of older housing stock.
- Financing for derivative companies including the ethane and butane space.
- Multifamily housing in more rural areas of the CSA.

## **Scope of Evaluation in Charleston CSA**

This area received a full-scope review. For purposes of this evaluation, examiners combined the bank's delineated AAs into one and aggregated the data at the CSA level for purposes of analysis and presentation. FTB did not originate or purchase enough small loans to farms in the Charleston CSA to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHARLESTON CSA**

### **LENDING TEST**

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

Based on a full-scope review, the bank's performance in the Charleston CSA was excellent.

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit.

<b>Number of Loans</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Charleston CSA	2,038	582	3	9	2,632

<b>Dollar Volume of Loans (\$000s)</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Charleston CSA	249,188	64,605	96	9,937	323,826

FTB had a deposit market share of 4.5 percent and ranked seventh among 25 FDIC-insured banks, which placed it in the top 28 percent of banks.

The bank had a market share of 4 percent based on the number of home mortgage loans originated or purchased and ranked fourth among 315 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 19.6 percent were Rocket Mortgage (8.7 percent), City National Bank of West Virginia (6.6 percent), and Prime Lending (4.3 percent).

The bank had a market share of 2.9 percent based on the number of small loans to businesses originated or purchased and ranked 12<sup>th</sup> out of 113 small business lenders, which placed it in the top 11 percent of lenders. The top three lenders with a combined market share of 26.9 percent were Truist Financial (9.8 percent), American Express National Bank (9.1 percent), and WesBanco Bank (8 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA and small loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in low-income geographies and was below the aggregate distribution of all lenders. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of all lenders.

#### ***Small Loans to Businesses***

Refer to Table Q in the Charleston CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses in low-income geographies but was below the aggregate distribution of all lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the Charleston CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 14.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the CSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made nine CD loans totaling nearly \$9.9 million, which represented 16.6 percent of allocated tier 1 capital. CD loans were primarily made for community services purposes. By dollar volume, 8.4 percent of these loans funded affordable housing, 19 percent funded economic development, 26.3 percent funded revitalization and stabilization efforts, and 46.3 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$1.5 million Paycheck Protection Program (PPP) loan that assisted a medical facility located in a low-income geography in Portsmouth, OH to continue offering services during the pandemic.
- \$600,000 loan (and renewed during the evaluation period) to a multi-service nonprofit organization headquartered in Huntington, WV. The organization provides job and skills training services to low- and moderate-income persons within Kentucky, Ohio, and West Virginia, including the bank's AA.

### Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 238 loans under flexible lending programs specific to the AA totaling \$26.3 million. Program volumes included three 53 Community Mortgage loans totaling \$200,000, 114 FHA loans totaling \$12.2 million, 17 Freddie Mac HP loans totaling \$1.6 million, 33 Fannie Mae HR loans totaling \$2.7 million, 24 USDA/RHS loans totaling \$2.8 million, and 47 VA loans totaling \$6.9 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

### INVESTMENT TEST

The institution's performance under the Investment Test in the Charleston CSA is rated Outstanding.

Based on a full-scope review, the FTB's performance in the Charleston CSA was excellent.

### Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Charleston CSA	17	2,768	96	4,424	113	100	7,192	100	8	119

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

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

The bank made 96 investments totaling \$4.4 million during the evaluation period to approximately 45 organizations/projects. The dollar volume of current and prior period investments represented 12 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 90.7 percent of investments supported affordable housing, 8.4 percent funded community services to low- and moderate-income individuals, and 0.9 percent supported economic development. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$736,000 investment to construct a 36-unit complex for low-income seniors in St. Albans, WV.
- \$630,000 investment to construct a 45-unit apartment complex in Portsmouth, OH to serve transition age youth. The local housing authority partnered with a family health center to coordinate necessary services, including teaching skills necessary for independent living. All units are income restricted to individuals with income from 30 to 60 percent of the AMI.
- \$250,000 investment in a LIHTC project that will renovate a 32-unit apartment complex in Huntington, WV. Households must earn less than 60 percent of the AMI. The project also participates in Section 521 USDA rental assistance for very low and low- and moderate-income families.

## SERVICE TEST

The institution’s performance under the Service Test in the Charleston CSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Charleston CSA was excellent.

## Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Charleston CSA	100.0	8	100.0	12.5	25.0	50.0	12.5	0.0	4.2	17.0	49.9	28.3	0.5

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution’s AA. The bank’s distribution of branches in both low- and moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 13 ATMs in the AA, of which 11 were deposit-taking.

Distribution of Branch Openings/Closings
Branch Openings/Closings



Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Charleston CSA	0	4	0	0	-3	-1	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed four branches, all in middle- or upper income geographies. Branch closures resulted from lower market activity and demand with several branches consolidated into nearby locations.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours in low- and moderate-income geographies were comparable to those in middle- and upper income geographies.

### **Community Development Services**

The institution was a leader in providing CD services.

Over 50 bank employees provided 76 qualified CD service activities to approximately 30 organizations logging 2,377 qualified hours. Leadership is evident through board or committee participation in 35 of these activities with 12 employees providing 706 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community service and economic development needs.

The following are examples of CD services provided in this AA:

- An employee served on the board of a capital fund that invests in eligible small businesses in West Virginia. The employee provided 216 hours of service.
- An employee served on the board of a children's advocacy organization serving low- and moderate-income families located in West Virginia. The employee provided 48 hours of service.
- Bank staff provided 25 financial education programs, which included 14 YBC sessions for over 350 students.

## Chicago-Naperville, IL-IN-WI (Chicago) CSA

**CRA rating for the Chicago CSA<sup>2</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distribution of loans and overall distribution of loans by borrower income and businesses of different sizes was good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes.

## Description of Institution's Operations in Chicago CSA

FTB delineated a portion of the Chicago CSA as its AA. The area included a portion of the Chicago-Naperville-Elgin, IL-IN-WI MSA, and the entire Michigan City-LaPorte, IN MSA. Refer to appendix A for a list of counties reviewed.

The Chicago CSA was FTB's second largest rating area based on total deposits. The bank had approximately \$29.2 billion in deposits, representing 17.3 percent of its total deposits. The area was served by 161 FDIC-insured banks operating 2,361 branches. FTB ranked sixth with 5.2 percent deposit market share. The top three banks and their deposit market share include JPMorgan Chase Bank, N.A. (23.1 percent), BMO Harris Bank N.A. (15.1 percent), and Bank of America, N.A. (8.5 percent). FTB operated 170 branches and 268 ATMs. During the evaluation period, the bank made \$10.8 billion, or 18.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Chicago CSA

The following table provides a summary of the demographics, including housing, business, and economic information for the Chicago CSA AA.

---

<sup>2</sup>This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Chicago CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	2,194	14.0	23.6	29.4	32.0	1.0
Population by Geography	9,413,216	9.8	23.2	32.0	34.8	0.3
Housing Units by Geography	3,754,759	10.2	22.2	32.0	35.3	0.3
Owner-Occupied Units by Geography	2,200,480	4.4	17.4	35.4	42.7	0.1
Occupied Rental Units by Geography	1,204,800	17.3	29.4	27.5	25.1	0.6
Vacant Units by Geography	349,479	22.2	27.8	25.5	24.1	0.4
Businesses by Geography	830,261	6.1	16.7	29.4	47.4	0.4
Farms by Geography	13,898	3.5	14.7	40.0	41.7	0.1
Family Distribution by Income Level	2,243,386	23.3	16.3	18.7	41.7	0.0
Household Distribution by Income Level	3,405,280	25.2	15.3	17.1	42.5	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$236,800
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,035
Median Family Income MSA - 23844 Gary, IN		\$64,075	Families Below Poverty Level			10.6%
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137				
Median Family Income MSA - 33140 Michigan City-La Porte, IN MSA		\$58,424				
<i>Source: 2015 ACS and 2021 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Based on information in the above table, low-income families earned between \$32,038 and \$43,569 and moderate-income families earned between \$51,260 and \$69,710, depending on the metropolitan division (MD) and MSA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MD, this calculated to a maximum monthly mortgage payment between \$801 and \$1,089 for low-income borrowers and between \$1,282 and \$1,773 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,275. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

### **Economic Data**

Information from Moody's Analytics indicated the Chicago CSA AA had a well-diversified economy. Key sectors of the economy based on percentage of total employment included Professional and Business Services, Education and Health Services, Government, and Leisure and Hospitality Services. Major employers in the AA included Advocate Health Care System, the University of Chicago, Abbott Laboratories, JPMorgan Chase & Co., Northwestern Memorial Healthcare, and Amazon.

The unemployment rate in the Chicago CSA was 4.7 percent in December 2017 rising to 17.5 percent in March 2020 and was 4.3 percent in December 2021.

The region continued to be impacted by state and local budgetary pressures, along with above average crime rates, which had an impact on population growth. The area experienced an outflow of population over the evaluation period, which worsened more than expected. This also impacted job growth. Illinois continues to experience a high level of foreclosures, with the third highest level among the 50 states. Two of the top five counties for foreclosures in Illinois were in the Chicago CSA. In addition, although home values had rebounded in recent years overall, many areas continued to reflect home values struggling to bounce back, specifically homes located in low- and moderate-income geographies. A study by a local university showed the home values in geographic areas south of downtown Chicago, which had a higher percentage of properties in low- and moderate-income geographies, were struggling the most. As a result, refinance and home equity loan opportunities were still limited for these areas where property values are still “underwater.”

### **Community Contacts**

Information from 11 community contact interviews; five from economic development entities, three from affordable housing organizations, and three from local government agencies, identified the following needs within the Chicago CSA:

- Financing for one-to-four family home purchases and rehabilitation, multifamily buildings with tenants using Section 8 housing vouchers, and small businesses.
- Credit builder programs and emergency savings accounts.
- Investments in Community Development Financial Institutions (CDFI) loan pools that originate loans for affordable housing or micro loans to small businesses.
- Service on CDFI boards or committees.
- Down payment and closing cost assistance programs for low- and moderate-income borrowers.
- Financial counseling and education programs including first-time homebuyer programs.
- Foreclosure prevention programs designed to keep homeowners in their homes.
- Youth employment, job training, and workforce housing programs.

The Chicago CSA yielded abundant opportunities to serve the identified needs. There were numerous CD and social services organizations in the AA. Local governments had designated many areas for redevelopment and use a variety of resources to increase investments in those areas including tax increment financing districts, empowerment zones, CD block grants, and HOME Investment Partnership Programs.

### **Scope of Evaluation in Chicago CSA**

The Chicago CSA received a full-scope review. The bank-delineated AAs were combined, analyzed, and presented at the CSA level. This area received substantial weight in the overall bank rating as it accounted for 17.3 percent of total deposits and 15.4 percent of HMDA and small loans to business and farm lending during the evaluation period.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHICAGO CSA

### LENDING TEST

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

Based on a full-scope review, the bank's performance in the Chicago CSA was excellent.

#### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Chicago CSA	33,383	25,496	67	532	59,478

<b>Dollar Volume of Loans (\$000s)</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Chicago CSA	7,824,369	3,001,170	3,857	1,905,002	12,734,398

FTB had deposit market share of 5.2 percent and ranked sixth among 161 FDIC-insured banks, which placed it in the top 4 percent of banks.

The bank had a market share of 2.2 percent based on the number of home mortgage loans originated or purchased and ranked ninth among 987 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders with a combined market share of 19.5 percent were JPMorgan Chase Bank, N.A. (8.3 percent), Guaranteed Rate, Inc. (6.6 percent), and Rocket Mortgage (4.6 percent).

The bank had a market share of 4 percent based on the number of small loans to businesses originated or purchased and ranked eighth out of 350 small business lenders, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 35.9 percent were JPMorgan Chase Bank, N.A. (18.4 percent), American Express National Bank (11.2 percent), and Cross River Bank (6.4 percent).

The bank had a market share of 0.6 percent based on the number of small loans to farms originated or purchased and ranked 21<sup>st</sup> out of 55 small farm lenders, which placed it in the top 39 percent of lenders. The top three lenders with a combined market share of 36.9 percent were John Deer Financial F.S.B. (14.7 percent), JPMorgan Chase Bank, N.A. (13.2 percent), and Heartland Bank & Trust Company (9 percent).

#### Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in low-income geographies but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the Chicago CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near the percentage of businesses in low-income geographies and exceeded the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the Chicago CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but exceeded the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the Chicago CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 13.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the Chicago CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 14.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the CSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 532 CD loans totaling nearly \$1.9 billion, which represented 65.8 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 56.3 percent funded economic development, 20.8 percent funded revitalization and stabilization efforts, 17.2 percent funded community services targeted to low- and moderate-income individuals, and 5.7 percent funded affordable housing.

Examples of CD loans include:

- \$36.9 million loan to a city in the AA, where a majority of the residents earn less than 80 percent of the AMI. The funding allowed the city to provide essential public services.
- \$14.5 million loan to an entity developing a transit oriented mixed-use development that will include 99 residential units, with 50 allocated to low- and moderate-income residents, in the Bronzeville neighborhood of Chicago.
- \$11 million revolving line to an organization providing affordable housing, workforce development, and financial stability to low-income persons at 75 sites in Chicago. Over 90 percent of the organization's clients are unemployed and living below the poverty level.

## Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 1,240 loans under flexible lending programs specific to the AA totaling \$220.1 million. Program volumes included 30 IHDA loans totaling \$2.4 million, three 53 Community Mortgage loans totaling \$390,000, 595 FHA loans totaling \$112.9 million, 365 Freddie Mac HP loans totaling \$53.9 million, one Freddie Mac RP loan totaling \$253,000, 92 Fannie Mae HR loans totaling \$13.9 million, one Fannie Mae RN loans totaling \$190,000, six USDA/RA loans totaling \$782,000, and 147 VA loans totaling \$35.3 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## INVESTMENT TEST

The institution's performance under the Investment Test in the Chicago CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Chicago CSA was excellent.

### Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Chicago CSA	67	63,437	901	274,577	968	100	338,014	100	46	4,628

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

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



The bank made 901 investments during the evaluation period totaling \$274.6 million to approximately 80 organizations/projects. The dollar volume of current and prior period investments represented 11.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 81.8 percent of investments supported affordable housing, 13.7 percent supported economic development, 4 percent funded community services to low- and moderate-income individuals, and 0.5 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$37.5 million to a CDFI that provides financing for the acquisition, rehabilitation, and preservation of affordable rental housing in Chicago neighborhoods and suburban communities.
- \$20 million to the largest CDFI in the Midwest. The CDFI provides loans and real estate consulting to nonprofits, with a particular focus on those that serve low-income communities.
- \$19.5 million LIHTC for a transit oriented mixed-use complex that will contain 99 residential units in a Chicago neighborhood. Fifty units are restricted to renters earning up to 60 percent of AMI.
- \$11 million LIHTC for redevelopment of two vacant warehouses that will create 120 units of affordable housing in Chicago's McKinley Park neighborhood.

## SERVICE TEST

The institution's performance under the Service Test in the Chicago CSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Chicago CSA was good.

## Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits % of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Branches					Population				
				Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Chicago CSA	100.0	170	100.0	5.9	15.3	37.1	41.8	0.0	9.8	23.2	32.0	34.8	0.3

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was well below and in moderate-income geographies was below the percentage of the population living within those geographies. Examiners gave positive consideration for 17 branches in middle- and upper income geographies that were on the opposite side of the street from a low- or moderate-income geography and two middle- and upper income

branches where the percentage of usage by low- and moderate-income households equaled or exceeded the percentage of low- and moderate-income populations in the AA.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 268 ATMs in the AA, of which 241 were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Chicago CSA	6	81	-3	-3	-35	-33	-1

To the extent changes have been made, the institution's opening and closing of branches generally has not adversely affected its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank opened six branches, one in a moderate-income geography. The bank closed 81 branches, three in low-income geographies and four in moderate-income geographies. Most of these branch closures were consolidations with another nearby branch due to duplicative locations after the acquisition of MB Financial Bank.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours in low- and moderate-income geographies were comparable to branches in middle- and upper income geographies.

### Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 1,082 qualified CD service activities to over 150 organizations logging 20,789 qualified hours within the AA during the evaluation period. Leadership is evident through board or committee participation in 432 of these activities with 157 employees providing 10,694 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community service and economic development needs.

The following are examples of CD services provided in this AA:

- Sixteen bank employees served on a qualified CD organization's fundraising committee providing a total of 254 hours of service in one year of the evaluation period.
- An employee served on the board of directors of an organization that assists Hispanic and Latino small businesses obtain financing. The employee provided 190 hours of service in one year of the evaluation period.
- Bank staff provided nearly 350 financial education programs, which included 78 YBC sessions to over 1,800 students.

## Cincinnati-Wilmington-Maysville, OH-KY-IN (Cincinnati) CSA

**CRA rating for the Cincinnati CSA<sup>3</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was good, and overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different and responsive in helping the bank provide services across the community.

### Description of Institution's Operations in Cincinnati CSA

FTB delineated a portion of the Cincinnati CSA as its AA. It included a portion of the Cincinnati OH-KY-IN MSA and a Non-MSA county in Ohio. Refer to appendix A for a list of the counties reviewed.

The Cincinnati CSA AA was FTB's largest rating area based on total deposits. The bank had approximately \$45.5 billion in deposits, representing nearly 27 percent of the bank's total deposits. The area was served by 58 FDIC-insured banks operating 657 branches. FTB ranked second with 28.7 percent deposit market share. The top three banks, excluding FTB, and their deposit market share include U.S. Bank, N.A. (46.4 percent), PNC Bank N.A. (5.8 percent), and The Huntington National Bank (3.1 percent). FTB operated 116 branches and 309 deposit-taking ATMs. During the evaluation period, the bank made \$6.2 billion, or 10.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Cincinnati CSA

The following table provides a summary of the demographics, including housing, business, and economic information for the Cincinnati CSA AA.

---

<sup>3</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

**Table A – Demographic Information of the Assessment Area****Assessment Area: Cincinnati CSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	498	12.7	22.7	37.8	25.1	1.8
Population by Geography	2,151,034	8.0	19.7	40.2	30.9	1.2
Housing Units by Geography	921,243	9.8	21.2	40.4	28.1	0.5
Owner-Occupied Units by Geography	548,041	3.8	16.4	43.6	36.0	0.1
Occupied Rental Units by Geography	278,959	17.8	28.6	35.9	16.7	1.1
Vacant Units by Geography	94,243	21.6	26.6	34.9	15.7	1.2
Businesses by Geography	155,562	6.5	19.5	36.8	36.1	1.0
Farms by Geography	4,893	3.2	16.3	49.6	30.9	0.1
Family Distribution by Income Level	542,546	22.1	16.8	20.0	41.2	0.0
Household Distribution by Income Level	827,000	25.1	15.5	17.2	42.3	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$69,949	Median Housing Value			\$156,211
Median Family Income Non-MSAs - OH		\$55,785	Median Gross Rent			\$764
			Families Below Poverty Level			10.4%

Source: 2015 ACS and 2021 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.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$34,975 and moderate-income families earned less than \$55,959. The median housing value in the AA is \$156,211. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$874 for a low-income borrower and \$1,399 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$852. Some low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 10.4 percent of families were living below the poverty level.

### **Economic Data**

According to Moody's Analytics, Cincinnati has a highly educated and skilled workforce, low living costs, and affordable housing. The economy is being driven by gains in professional and business services and leisure and hospitality. The factory sector has been hard hit by supply chain disruptions. Auto manufacturers have struggled with shortages of semiconductors fabricated in East Asia. According to the County Health Rankings, Hamilton County, Cincinnati's most populous county, ranks in the bottom half of U.S. counties for health quality.

Healthcare is a growing industry, and Cincinnati Children’s Hospital and Mercy Health are both expanding and adding workers. The housing market is strong, and prices are up by double digits, driven by high demand. Professional and business services, education and health services, government, and manufacturing are important economic drivers of the economy. The largest employers are Cincinnati Children’s Hospital Medical Center, Kroger Co., Cincinnati/Northern Kentucky International Airport, TriHealth Inc., and UC Health.

The unemployment rate for the Cincinnati CSA was 5.2 percent as of January 2017. Unemployment levels significantly increased from 4.7 percent in March 2020 to 13.6 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the Cincinnati CSA was 2.8 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

As part of the CRA evaluation, the OCC held a listening session, completed one community contact, and reviewed information from three additional contacts within the Cincinnati CSA to better understand area credit and community needs. Organizations included local government housing authorities, affordable housing agencies, community development corporations, and community service providers. Community group leaders in the listening sessions indicated needs for affordable housing and workforce development programs. Participants also expressed the need for CD services including financial coaching, financial education/literacy, and face-to-face outreach. Outreach was cited especially as the COVID-19 pandemic subsides. Specifically, community group leaders cited the following needs:

- Preservation of affordable rental and homeownership units.
- Focused policy actions to create more affordable rental properties.
- Affordable housing units created by using investment vehicles outside of LIHTC.
- Offering small dollar mortgage loan products at under \$100,000.
- Providing services for unbanked and underbanked individuals.
- Workforce development programs, and associated housing.
- Financial coaching opportunities.

## **Scope of Evaluation in Cincinnati CSA**

The Cincinnati CSA AA received a full-scope review. This area received substantial weight in the overall bank rating as it accounted for 27 percent of total deposits and 10.5 percent of HMDA and small loans to farm and business lending during the evaluation period.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CINCINNATI CSA**

### **LENDING TEST**

The bank’s performance under the Lending Test in the Cincinnati CSA is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Cincinnati CSA was excellent.

## Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Cincinnati CSA	31,923	13,515	144	272	45,854

Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Cincinnati CSA	4,667,869	1,495,643	4,852	1,576,814	7,745,178

FTB had a deposit market share of 28.7 percent and ranked second among 58 FDIC-insured banks placing it in the top 4 percent of banks.

The bank had a market share of 6.4 percent based on the number of home mortgage loans originated or purchased and ranked second among 669 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top lender, Union Savings Bank, had a market share of 7.2 percent.

The bank had a market share of 11.5 percent based on the number of small loans to businesses originated or purchased and ranked third out of 197 small business lenders, which placed it in the top 2 percent of lenders. The top three lenders, excluding FTB, with a combined market share of 34.1 percent were American Express National Bank (13.2 percent), U.S. Bank, N.A. (12.1 percent), and PNC Bank N.A. (8.8 percent).

The bank had a market share of 0.6 percent based on the number of small loans to farms originated or purchased and ranked 12<sup>th</sup> out of 26 small farm lenders, which placed it in the top 47 percent of lenders. The top three lenders with a combined market share of 54.3 percent were The Huntington National Bank (23.8 percent), John Deere Financial, F.S.B. (20 percent), and Peoples Bank (10.5 percent).

## Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### *Home Mortgage Loans*

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in both low- and moderate-income geographies was near the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the Cincinnati CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was near the percentage of businesses in moderate-income geographies and approximated the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the Cincinnati CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below both the percentage of farms in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the Cincinnati CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 13.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the Cincinnati CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 23.6 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the CSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 272 CD loans totaling nearly \$1.6 billion, which represented 35 percent of allocated tier 1 capital. CD loans were primarily made for revitalization and stabilization purposes. By dollar volume, 54.7 percent funded revitalization and stabilization efforts, 19.6 percent funded community services targeted to low- and moderate-income individuals, 17 percent funded economic development, and 8.7 percent funded affordable housing.

Examples of CD loans include:

- \$14.3 million loan to an entity developing the largest housing project for low- and mixed-income families in the Over-the-Rhine neighborhood in Cincinnati. The project will provide 163 residential units along with 20,000 square feet of commercial space. The project is considered complex as it involved 13 different funding sources including tax credits, opportunity zone investments, conventional debt, and city funding.



- \$7.7 million loan for a LIHTC supported development of a 50-unit affordable senior housing community in Roselawn, a suburb of Greater Cincinnati. Units are restricted to renters making 30 to 60 percent of AMI. The project included funding from public and private entities including the Ohio Housing Financing Agency, the City of Cincinnati, and the Greater Cincinnati Redevelopment Authority. FTB also provided a \$10.2 million investment.
- \$100,000 line of credit to a company that is one of the nation's largest Medicaid managed care plans. The line of credit allowed the company to continue operations during the COVID-19 pandemic.

## Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, the bank originated or purchased 2,351 loans under flexible lending programs totaling \$336.1 million. Program volumes included 48 KHC loans totaling \$3.4 million, 33 53 Community Mortgage loans totaling \$4.1 million, 950 FHA loans totaling \$141.2 million, 780 Freddie Mac HP loans totaling \$100.1 million, 128 Fannie Mae HR loans totaling \$16.2 million, 84 USDA/RA loans totaling \$11.7 million, and 328 VA loans totaling \$59.4 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## INVESTMENT TEST

The institution's performance under the Investment Test in the Cincinnati CSA is rated Outstanding.

Based on a full-scope review, FTB's performance in the Cincinnati CSA was excellent.

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Cincinnati CSA	74	63,315	491	262,737	565	100	326,052	100	44	8,422

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

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

The bank made 491 investments totaling \$262.7 million during the evaluation period to over 200 organizations/projects. The dollar volume of current and prior period investments represented 7.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 93.4 percent of investments supported affordable housing, 3.5 percent funded community services to low- and moderate-income individuals, 2.7 percent supported economic development, and 0.4 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$13.6 million LIHTC investment to acquire and rehabilitate an affordable multifamily project in Hamilton, OH. The project consists of 168 units, which are also subject to a HUD Section 8 rental assistance program contract.
- \$10.5 million LIHTC investment to renovate and preserve 93 units of affordable senior housing in Cincinnati.
- \$10.1 million LIHTC investment to create 57 units of affordable senior housing in the Northside neighborhood of Cincinnati. The units are income restricted to 30 to 60 percent of the AMI. The complex will be the first LGBTQ+ senior housing development in Cincinnati.
- \$7 million equity equivalent investment and donation to a CDC and loan fund which directly impacts the Price Hill neighborhood in Cincinnati. The investment helped create the Opportunity Hub, a space for residents to connect with jobs, housing, and other needed services including a community market and food pantry.

## SERVICE TEST

The institution's performance under the Service Test in the Cincinnati CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Cincinnati CSA AA was excellent.

## Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Cincinnati CSA	100.0	116	100.0	4.3	22.4	43.1	29.3	0.9	8.0	19.7	40.2	30.9	1.2

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was well below and in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners gave positive consideration for six branches in middle- and upper income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 309 ATMs in the AA, of which 252 were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Cincinnati CSA	7	16	0	-2	-4	-1	-2

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank opened seven branches, all in middle- and upper income geographies. The bank closed 16 branches, two of which were in moderate-income geographies. The branch closures were due to reduction in branch transaction volume or grocery store locations where the store closed or was significantly remodeled.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours of branches in low- and moderate-income geographies were comparable to those in middle- and upper income geographies.

### Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 634 qualified CD service activities to over 150 organizations logging 13,955 qualified hours within the AA during the evaluation period. Leadership is evident through board or committee participation in 250 of these activities with over 100 employees providing 6,428 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community service needs.

The following are examples of CD services provided in this AA:

- An employee served as treasurer for an organization that provides community services to allow residents to achieve self-sufficiency. The employee provided 120 hours of service.
- Bank staff provided 82 financial education programs, which included 22 YBC sessions to over 425 students.

## Evansville, IN-KY (Evansville) MMSA

**CRA rating for the Evansville MMSA<sup>4</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was adequate and overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes.

## Description of Institution's Operations in Evansville MMSA

FTB delineated the entire Evansville MMSA as its AA. Refer to appendix A for the counties reviewed.

The Evansville MMSA was FTB's 11<sup>th</sup> largest rating area based on total deposits. The bank had approximately \$2.4 billion in deposits, representing 1.4 percent of the bank's total deposits. The area was served by 18 FDIC-insured depository institutions operating 85 branches. FTB ranked second with 28 percent deposit market share. The top three banks, excluding FTB, and their deposit market share were Old National Bank (34.9 percent), United Fidelity Bank F.S.B. (7.2 percent), and German American Bank (7.1 percent). FTB operated 13 branches and 19 ATMs. During the evaluation period, the bank made \$475.9 million, or 0.8 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Evansville MMSA

The following table provides a summary of the demographics for the including housing, business, and economic information for the Evansville MMSA AA.

---

<sup>4</sup>This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

**Table A – Demographic Information of the Assessment Area****Assessment Area: Evansville MMSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	78	14.1	23.1	42.3	17.9	2.6
Population by Geography	314,263	8.9	19.0	45.3	26.7	0.2
Housing Units by Geography	139,778	10.0	20.8	44.9	24.0	0.3
Owner-Occupied Units by Geography	85,908	5.7	13.6	48.2	32.4	0.1
Occupied Rental Units by Geography	40,032	15.9	34.2	39.3	10.1	0.5
Vacant Units by Geography	13,838	19.3	27.1	40.7	12.4	0.6
Businesses by Geography	25,790	8.5	20.1	38.3	29.0	4.1
Farms by Geography	1,163	3.5	8.9	55.5	31.5	0.5
Family Distribution by Income Level	81,857	21.3	17.6	20.6	40.4	0.0
Household Distribution by Income Level	125,940	23.6	17.1	17.4	41.9	0.0
Median Family Income MSA - 21780 Evansville, IN-KY MSA		\$61,595	Median Housing Value			\$118,144
			Median Gross Rent			\$690
			Families Below Poverty Level			11.1%

*Source: 2015 ACS and 2021 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.*

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$30,798 and moderate-income families earned less than \$49,215. The median housing value in the AA is \$118,144. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$668 for a low-income borrower and \$1,077 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$634. Some low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 11.1 percent of families were living below the poverty level.

According to Moody's Analytics, the manufacturing industry has recovered due to strong demand for plastics, but gains are offset by a contraction in the service industry. The healthcare industry is heavily reliant on hospitals, which account for about 6.5 percent of employment, nearly double the national average. Hospitals in Evansville provide care to much of southwest Indiana and parts of Illinois and Kentucky. Large employers include Deaconess Hospital, Toyota Motor Manufacturing of Indiana, St. Vincent, Berry Global, and the University of Southern Indiana. The unemployment rate for this AA was 4.5 percent in January 2017, spiked to

14.7 percent in April 2020, and declined to 1.5 percent in December 2021. The national unemployment rate was 3.7 percent in December 2021.

## Scope of Evaluation in Evansville MMSA

The Evansville MMSA received a full-scope review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN EVANSVILLE MMSA

### LENDING TEST

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

Based on a full-scope review, the bank's performance in the Evansville MMSA was excellent.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Evansville MMSA	3,625	888	25	19	4,557

Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Evansville MMSA	388,438	85,413	2,007	121,009	596,867

FTB had a deposit market share of 28 percent and ranked second among 18 FDIC-insured banks placing it in the top 12 percent of banks.

The bank had a market share of 5.5 percent based on the number of home mortgage loans originated or purchased and ranked fourth among 313 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 32.3 percent were Evansville Teachers (18.9 percent), Mortgage Masters of Indiana (7.3 percent), and AmeriHome Mortgage Company (6.2 percent).

The bank had a market share of 6.4 percent based on the number of small loans to businesses originated or purchased and ranked fourth out of 102 small business lenders, which placed it in the top 4 percent of lenders. The top three lenders with a combined market share of 47.4 percent were Old National Bank (23.9 percent), German American Bank (14.6 percent), and American Express National Bank (8.9 percent).

The bank had a market share of 0.9 percent based on the number of small loans to farms originated or purchased and ranked ninth out of 17 small farm lenders, which placed it in the top 53 percent of lenders. The top three lenders with a combined market share of 78.2 percent were Independent Bank of Kentucky (39.1 percent), John Deere Financial, F.S.B. (20.9 percent), and German American Bank (18.2 percent).

## **Distribution of Loans by Income Level of the Geography**

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in low-income geographies but near the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near both the percentage of owner-occupied homes in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the Evansville MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in both low- and moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the Evansville MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank made no small loans to farms in low- or moderate-income geographies.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low-and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the Evansville MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers approximated the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the Evansville MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 24 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of \$1 million or less was well below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the MMSA.



The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 19 CD loans totaling nearly \$121 million, which represented 51.4 percent of allocated tier 1 capital. Several CD loans were made for affordable housing purposes; however, by dollar volume, CD loans primarily funded economic development. By dollar volume, 76.8 percent funded economic development, 14.5 percent funded affordable housing, 5.2 percent funded revitalization and stabilization efforts, and 3.5 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$5.9 million loan for the development of a 50-unit housing project with 100 percent of the units allocated to low- and moderate-income persons. The project is spread over two sites and will also provide supportive services to residents.
- \$4.3 million loan for a LIHTC supported project to renovate 35 residential units and the construction of a single-family home with the units allocated to low- and moderate-income persons. Four units are set aside for persons with chronic homelessness. The renovation will also extend the affordability for an additional 30 years.
- \$90,000 loan to a nonprofit organization that develops affordable housing and provides supportive services for homeless persons in Evansville.

### **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, the bank originated or purchased 196 loans under flexible lending programs totaling \$24.4 million. Program volumes included 14 KHC loans totaling \$624,000, four 53 Community Mortgage loans totaling \$381,000, 79 FHA loans totaling \$10.1 million, 48 Freddie Mac HP loans totaling \$5.4 million, 11 Fannie Mae HR loans totaling \$1.1 million, six USDA/RA loans totaling \$853,000, and 34 VA loans totaling \$5.9 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

### **INVESTMENT TEST**

The institution's performance under the Investment Test in the Evansville MMSA is rated Outstanding.

Based on a full-scope review, the FTB's performance in the Evansville MMSA was excellent.

### **Number and Amount of Qualified Investments**

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Evansville MMSA	11	4,920	111	38,437	122	100	43,357	100	8	194

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

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

The bank made 111 investments totaling \$38.4 million during the evaluation period to approximately 50 organizations/projects. The dollar volume of current and prior period investments represented 18.4 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 97.6 percent of investments supported affordable housing, 1.4 percent funded community services to low- and moderate-income individuals, 0.7 percent supported economic development, and 0.3 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$8.3 million investment for the development of a 50-unit affordable housing development in Evansville for low-income residents. The development was also the recipient of a Federal Home Loan Bank Affordable Housing Program grant.
- \$7.9 million investment in a 49-unit apartment affordable housing development for seniors in Henderson, KY. Units are income restricted to 60 percent or less of the AMI.
- \$5 million investment in a 27-unit permanent supportive housing designed for individuals who experience chronic homelessness in Evansville. Twelve of the units are designated for individuals who are “medically vulnerable,” in addition to experiencing chronic homelessness.

## SERVICE TEST

The institution’s performance under the Service Test in the Evansville MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Evansville MMSA AA was excellent.

## Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Evansville MMSA	100.0	13	100.0	7.7	15.4	61.5	15.4	7.7	8.9	19.0	45.3	26.7	0.2

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. Examiners gave positive consideration for one branch in a middle- or upper income geography that was on the opposite side of the street from a low- or moderate-income geography. Examiners also gave positive consideration for one middle- or upper income branch where the percentage of usage by low- and moderate-income households equaled or exceeded the low- and moderate-income population percentage in the AA.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 19 ATMs in the AA, of which 17 were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Evansville MMSA	1	4	0	-1	-1	-1	0

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank opened and closed one branch in a geography with an "NA" income classification. The bank closed three additional branches, one of which was in a moderate-income geography. The branch closures were short distance consolidations due to reductions in branch transaction volumes.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours in low- and moderate-income geographies were comparable to branches in middle- and upper income geographies.

## Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 77 qualified CD service activities to 23 organizations logging 2,129 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in

47 of these activities with 20 employees providing 1,310 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community service and affordable housing needs.

The following are examples of CD services provided in this AA:

- An employee served as board chair and a member of the executive committee of an organization that provides services to low- and moderate-income disabled persons. The employee provided 100 hours of service.
- Bank staff provided 18 financial education programs, which included two YBC sessions which reached over 40 students.

## Louisville/Jefferson County, KY-IN (Louisville) MMSA

**CRA rating for the Louisville MMSA<sup>5</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was adequate and overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. FTB made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

### Description of Institution's Operations in Louisville MMSA

FTB delineated a portion of the Louisville MMSA as its AA. Refer to appendix A for a list of the counties reviewed.

The Louisville MMSA was FTB's eighth largest rating area based on total deposits. The bank had approximately \$3.9 billion in deposits, representing 2.3 percent of its total deposits. The area was served by 39 FDIC-insured depository institutions operating 353 branches. FTB ranked third with 10 percent deposit market share. The top three banks, excluding FTB, and their deposit market share include PNC Bank N.A. (21.8 percent), JPMorgan Chase Bank, N.A. (18.9 percent), and Republic Bank and Trust Company (9.5 percent). FTB operated 33 branches and 58 ATMs representing 3 percent of total branches and 2.5 percent of ATMs. During the evaluation period, the bank made nearly \$1.5 billion, or 2.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Louisville MMSA

The following table provides a summary of the demographics for the Louisville MMSA including housing, business, and economic information for the Louisville MMSA AA.

---

<sup>5</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

**Table A – Demographic Information of the Assessment Area****Assessment Area: Louisville MMSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	260	13.5	20.8	35.0	30.0	0.8
Population by Geography	1,052,217	10.0	18.3	38.6	32.7	0.3
Housing Units by Geography	458,971	10.6	19.7	38.4	30.9	0.5
Owner-Occupied Units by Geography	269,423	4.7	14.7	41.0	39.4	0.1
Occupied Rental Units by Geography	145,148	18.5	27.2	35.0	18.4	0.9
Vacant Units by Geography	44,400	20.5	24.7	33.3	20.1	1.3
Businesses by Geography	114,778	8.0	15.3	32.3	41.0	3.4
Farms by Geography	3,017	4.1	10.3	40.1	44.6	0.8
Family Distribution by Income Level	261,549	21.1	17.3	19.7	42.0	0.0
Household Distribution by Income Level	414,571	24.8	15.6	17.5	42.0	0.0
Median Family Income MSA - 31140 Louisville/Jefferson County, KY-IN MSA		\$64,965	Median Housing Value			\$162,956
			Median Gross Rent			\$751
			Families Below Poverty Level			10.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%.</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the table, low-income families earned less than \$32,483 and moderate-income families earned less than \$51,972. The median housing value in the AA is \$162,956. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$812 for a low-income borrower and \$1,299 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$857. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 10.7 percent of families were living below the poverty level.

### **Economic Data**

According to Moody's Analytics, the Louisville economy is growing at an average rate since the recession. The unemployment rate is nearing pre-pandemic levels; however, forward economic momentum has slowed. Slowing population growth is constraining economic potential. Some area strengths are the demand for locally produced trucks and sports-utility vehicles, a strategic location within close proximity to two-thirds of the nation's population, and a low cost of doing business. Housing prices and permits are increasing.

Manufacturing, professional and business services, education and health services, and government are important drivers of the economy. The largest employers are United Parcel Service, Fort Knox, Norton Healthcare, Ford Motor Company, and Humana.

The unemployment rate for the Louisville MMSA was 4.6 percent as of January 2017. Unemployment levels significantly increased from 4.1 percent in March 2020 to 16.8 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the Louisville MMSA was 2.9 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

### **Community Contacts**

In November 2021, the OCC held a listening session with organizations located within the Louisville MMSA to better understand area credit and community needs. Participating organizations focus their efforts in the areas of affordable housing, small business development, and community services. Participants expressed that affordable housing remains a key need in the community, especially given the rapid appreciation in the price of homes and rents within the metro. Participants also identified the rising costs of utilities as problematic in the affordable housing space. The need for CD services exists in the market. Participants described how unbanked and underbanked individuals need paths for entry into the banking system and communication directly with bankers would be an avenue. Individuals also described the need for products and services that eliminate overdraft fees. Needs in the MMSA include:

- Affordable single and multifamily housing, with the latter potentially created through LIHTC investments.
- Access to small business credit.
- Workforce development training, including career training for residents in financial services.
- Redevelopment of vacant and abandoned properties in west Louisville.

### **Scope of Evaluation in Louisville MMSA**

The Louisville MMSA received a full-scope review. FTB did not originate or purchase enough small loans to farms in the Louisville MMSA to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISVILLE MMSA**

### **LENDING TEST**

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

Based on a full-scope review, the bank's performance in the Louisville MMSA was excellent.

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Louisville MMSA	8,566	2,336	11	56	10,969

<b>Dollar Volume of Loans (\$000s)</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Louisville MMSA	1,252,908	236,370	1,114	181,511	1,671,903

FTB had a deposit market share of 10 percent and ranked third among 39 FDIC-insured banks placing it in the top 8 percent of banks.

The bank had a market share of 3.5 percent based on the number of home mortgage loans originated or purchased and ranked sixth among 530 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 15.7 percent were Rocket Mortgage (5.7 percent), United Wholesale Mortgage, LLC (5.1 percent), and Home Point Financial Corporation (5 percent).

The bank had a market share of 3.7 percent based on the number of small loans to businesses originated or purchased and ranked eighth out of 165 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 34.8 percent were Stock Yards Bank & Trust Company (12.5 percent), American Express National Bank (11.8 percent), and PNC Bank N.A. (10.5 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA and small loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in low-income geographies but near the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

#### ***Small Loans to Businesses***

Refer to Table Q in the Louisville MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.



The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies and exceeded the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was near the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the Louisville MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 11 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the MMSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 56 CD loans totaling nearly \$181.5 million, which represented 47 percent of allocated tier 1 capital. By dollar volume, 18.8 percent of these loans funded affordable housing, 11.5 percent funded economic development, 39.8 percent funded revitalization and stabilization efforts, and 29.9 percent funded community services targeted to low- and moderate-income individuals.

Examples of community development loans include:

- \$13.3 million construction loan to develop a 312-unit LIHTC apartment complex in South Louisville. Units are affordable to households earning 60 percent or less of the AMI. The project involved multiple layers of financing including tax exempt bonds and LIHTC issued by the KHC and loan financing involving other financial institutions.
- \$1 million line of credit to a nonprofit organization that provides community services to low- and moderate-income families and individuals. The line helps the organization manage cash flows to support services between payment of pledges and donations.
- \$750,000 line of credit to a nonprofit organization to help them manage and maintain 900 affordable housing units for persons earning less than 30 percent of AMI. This is the first nonprofit in Kentucky to be approved by HUD to offer their eligible residents the Family Self-Sufficiency Program designed to assist residents in increasing their income and exiting subsidized housing.

### **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, the bank originated or purchased 508 loans totaling \$67.4 million under flexible lending programs. Program volumes included 93 KHC loans totaling \$6.3 million, 21 53 Community Mortgage loans totaling \$2.6 million, 182 FHA loans totaling \$26.4 million, 97 Freddie Mac HP loans totaling \$12.5 million, 27 Fannie Mae HR loans totaling \$3.4 million, two Fannie Mae RN loans totaling \$351,000, 13 USDA/RA loans totaling \$2.2 million, and 73 VA loans totaling \$13.6 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

### **INVESTMENT TEST**

The institution's performance under the Investment Test in the Louisville MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Louisville MMSA was excellent.

### **Number and Amount of Qualified Investments**

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Louisville MMSA	20	9,844	202	39,299	222	100	49,143	100	14	1,452

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

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

The bank made 202 investments totaling \$39.3 million during the evaluation period to over 80 organizations/projects. The dollar volume of current and prior period investments represented 12.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 94.6 percent of investments supported affordable housing, 3.6 percent funded community services to low- and moderate-income individuals, 1.5 percent supported economic development, and 0.2 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$14 million investment in a 312-unit LIHTC complex in Louisville, KY. Units are income restricted up to 60 percent of the AMI. Additional services offered to residents include onsite weekly healthcare services, after-school activities for children, tutoring, and financial planning seminars.
- \$11.9 million investment in a LIHTC project that will create 38 units of affordable housing in New Albany, IN. Through a federal lease-to-purchase program, residents would be eligible to buy their unit after living there for at least 15 years.
- \$6.1 million investment in a LIHTC project that will provide 44 units of affordable senior housing in Shelbyville, KY.

## SERVICE TEST

The institution’s performance under the Service Test in the Louisville MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Louisville MMSA was excellent.

## Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits		Branches					Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Louisville MMSA	100.0	33	100.0	12.1	18.2	27.3	42.4	0.0	10.0	18.3	38.6	32.7	0.3

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was near the percentage of the population living within those geographies. Examiners gave positive consideration for two branches in middle- or upper-income geographies that were on the opposite side of the street from a low- or moderate-income geography and seven middle- or upper income branches where the percentage of usage by low- and moderate-income households equaled or exceeded the percentage of low- and moderate-income populations in the AA.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 58 ATMs in the AA, of which 53 were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Louisville MMSA	1	7	0	0	-5	-1	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank opened one branch and closed seven branches, with all activity in middle- and upper income geographies. The branch closures were short distance consolidations due to reductions in branch transaction volumes.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours in low- and moderate-income geographies were comparable to those in middle- and upper income geographies.

### Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 287 qualified CD service activities to approximately 90 organizations logging 4,030 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 133 of these activities with 25 employees providing 3,119 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community services to low- and moderate-income individuals.

The following are examples of CD services provided in this AA:

- An employee of the bank served on the board of an affordable housing organization serving Louisville and Southern Indiana. The employee provided 100 hours of service.
- Bank employees provided 89 financial education programs.

## South Bend-Elkhart-Mishawaka, IN-MI (South Bend) CSA

**CRA rating for the South Bend CSA<sup>6</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was adequate, and overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. FTB made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and data provided by the bank, and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in South Bend CSA

FTB delineated a portion of the South Bend-Elkhart-Mishawaka, IN-MI (South Bend) CSA as its AA. It includes the South Bend-Mishawaka, IN-MI MSA, the Elkhart-Goshen, IN MSA, and the Niles, MI MSA in their entirety. Refer to appendix A for the counties reviewed.

The South Bend CSA was FTB's 13th largest rating area based on total deposits. The bank had approximately \$1.2 billion in deposits, representing 0.7 percent of the bank's total deposits. The area was served by 20 FDIC-insured banks operating 163 branches. FTB ranked fourth with 9.4 percent deposit market share. The top three banks and their deposit market share included 1<sup>st</sup> Source Bank (30.6 percent), JPM Chase Bank, N.A. (16.1 percent), and Lake City Bank (14 percent). FTB operated 12 branches and 20 ATMs. During the evaluation period, the bank made \$428 million, or 0.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### South Bend CSA

The following table provides a summary of the demographics including housing, business, and economic information for the South Bend CSA AA.

---

<sup>6</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

**Table A – Demographic Information of the Assessment Area****Assessment Area: South Bend CSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	171	11.1	19.3	48.0	21.1	0.6
Population by Geography	675,448	6.4	16.4	52.6	24.6	0.0
Housing Units by Geography	295,912	7.2	16.0	55.1	21.7	0.0
Owner-Occupied Units by Geography	178,768	3.4	12.6	56.1	28.0	0.0
Occupied Rental Units by Geography	74,944	14.6	23.0	50.2	12.2	0.0
Vacant Units by Geography	42,200	10.3	18.0	59.8	11.9	0.0
Businesses by Geography	54,131	7.7	15.2	51.7	25.4	0.0
Farms by Geography	2,160	1.7	6.9	63.1	28.2	0.0
Family Distribution by Income Level	169,974	21.0	17.5	21.1	40.5	0.0
Household Distribution by Income Level	253,712	23.1	16.8	18.3	41.7	0.0
Median Family Income MSA - 21140 Elkhart-Goshen, IN MSA		\$55,551	Median Housing Value			\$122,527
Median Family Income MSA - 35660 Niles, MI MSA		\$57,640	Median Gross Rent			\$699
Median Family Income MSA - 43780 South Bend-Mishawaka, IN-MI MSA		\$57,692	Families Below Poverty Level			12.7%

Source: 2015 ACS and 2021 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.

According to Moody's Analytics, South Bend's recovery has slowed. Manufacturing's recovery remains lackluster compared with most of the state. On the other hand, slow growth has not stopped the metro area's strong education and healthcare sectors from outperforming most of the U.S., and leisure/hospitality is a standout, helped by a more normal academic year for the college town. The recovery of the labor force continues to stutter, but the unemployment rate is trending toward its pre-pandemic low. The unemployment rate was 4.8 percent in January 2017, rising to 21.1 percent in April 2020, and was 1.8 percent in December 2021. The area's largest employers were St. Joseph's Regional Medical Center, University of Notre Dame, MSM Holdco LLC, and Beacon Health System. Demographic challenges, owing in part to an inability to retain Notre Dame graduates, will keep the housing market lukewarm. Single-family home price growth remains historically high, though not as impressive as it is nationally.

## Scope of Evaluation in South Bend CSA

The South Bend CSA received a full-scope review. For purposes of this evaluation, examiners combined the bank's delineated AA into one and aggregated the data at the CSA level for purposes of analysis and presentation.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH BEND CSA

### LENDING TEST

The bank's performance under the Lending Test in the South Bend CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the South Bend CSA was excellent.

#### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
South Bend CSA	2,507	958	51	20	3,536

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

<b>Dollar Volume of Loans (\$000s)</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
South Bend CSA	332,416	89,004	6,581	62,564	490,565

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

FTB had a deposit market share of 9.4 percent and ranked fourth among 20 FDIC-insured banks, which placed it in the top 20 percent of banks.

The bank had a market share of 2.1 percent based on the number of home mortgage loans originated or purchased and ranked 14<sup>th</sup> among 501 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 16.9 percent were Rocket Mortgage (6.3 percent), Notre Dame Federal Credit Union (5.6 percent), and United Federal Credit Union (5 percent).

The bank had a market share of 3.6 percent based on the number of small loans to businesses originated or purchased and ranked eighth out of 138 small business lenders, which placed it in the top six percent of lenders. The top three lenders with a combined market share of 37.3 percent were 1<sup>st</sup> Source Bank (19.5 percent), JPMorgan Chase Bank, N.A. (9.2 percent), and American Express National Bank (8.6 percent).

The bank had a market share of 1.3 percent based on the number of small loans to farms originated or purchased and ranked 12<sup>th</sup> out of 22 small farm lenders, which placed it in the top 55 percent of lenders. The top three lenders with a combined market share of 61 percent were 1<sup>st</sup> Source Bank (28.1 percent), John Deere Financial, F.S.B. (20 percent), and Lake City Bank (12.9 percent).

#### Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in low-income geographies and was below the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in moderate-income geographies and near the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the South Bend CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was near the percentage of businesses in low-income geographies and exceeded the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the South Bend CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not make any small loans to farms in low- and moderate-income geographies during the evaluation period.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.



### ***Home Mortgage Loans***

Refer to Table P in the South Bend CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and equaled the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table R in the South Bend CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 13.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the South Bend CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 17.6 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the CSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 20 CD loans totaling nearly \$62.6 million, which represented 54.3 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 74.2 percent funded economic development, 0.1 percent funded revitalization and stabilization efforts, and 25.7 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$10 million line of credit to a manufacturing company located in South Bend. Over 74 percent of the employees earn less than 80 percent of the MSA median income. The line of credit allowed the company to retain 284 jobs.
- \$3 million working capital line of credit to a manufacturing company located in South Bend. Nearly 65 percent of the employees earn less than 80 percent of the MSA median income. The line of credit allowed the company to create four jobs and retain 33 jobs.
- \$2.5 million working capital line of credit to a manufacturing company located in Mishawaka, IN. Nearly 55 percent of the employees earn less than 80 percent of the MSA median income. The loan allowed the company to create 10 jobs.

## Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 183 loans under flexible lending programs specific to the AA totaling \$21.9 million. Program volumes included 10 MSHDA loans totaling \$509,000, one 53 Community Mortgage loans totaling \$157,000, 70 FHA loans totaling \$9.2 million, 56 Freddie Mac HP loans totaling \$5.7 million, 12 Fannie Mae HR loans totaling \$1.2 million, one Fannie Mae RN loans totaling \$122,000, two USDA/RA loans totaling \$348,000, and 31 VA loans totaling \$4.6 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## INVESTMENT TEST

The institution's performance under the Investment Test in the South Bend CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the South Bend CSA was excellent.

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
South Bend CSA	18	4,504	45	7,752	63	100	12,256	100	14	381
<b>Total</b>	<b>18</b>	<b>4,504</b>	<b>45</b>	<b>7,752</b>	<b>63</b>	<b>100</b>	<b>12,256</b>	<b>100</b>	<b>14</b>	<b>381</b>

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

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

The bank made 45 investments totaling \$7.7 million during the evaluation period, to over 30 organizations/projects. The dollar volume of current and prior period investments represented 10.6 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 97 percent of investments supported affordable housing, 1.6 percent funded community services to low- and moderate-income individuals, 1.2 percent supported economic development, and 0.2 percent supported revitalization and stabilization efforts. The institution occasionally used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$4.8 million investment in a 40-unit LIHTC senior housing complex in Middlebury, IN. Units participate in the Section 8 Rental Assistance Program and are income restricted to persons earning up to 30 percent of AMI.
- \$2.6 million investment in a 56-unit LIHTC senior housing apartment building in Watervliet, MI. Units participate in the Section 8 Rental Assistance Program and are income restricted to persons earning up to 30 percent of AMI.
- \$75,000 (\$15,000 in each year of the evaluation period) to support an organization involved in economic development and small business support services in southwest Michigan.

## SERVICE TEST

The institution's performance under the Service Test in the South Bend CSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the South Bend CSA was good.

## Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
South Bend CSA	100.0	12	100.0	25.0	0.0	58.3	16.7	0.0	6.4	16.4	52.6	24.6	0.0

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded the percentage of the population living within those geographies. There are no branches located in moderate-income geographies. Examiners gave positive consideration for one branch in a middle- or upper-income geography that was on the opposite side of the street from a low- or moderate-income geography and four middle- or upper income branches where the percentage of usage by low- and moderate-income households equaled or exceeded the percentage of low- and moderate-income populations in the AA.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 20 ATMs in the AA, of which 16 were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
South Bend CSA	0	3	0	0	-2	-1	0

To the extent changes have been made, the institution's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed three branches, all in middle- and upper income geographies. The branch closures were short distance consolidations due to the reduction in branch transaction volumes.

Services, including where appropriate, business hours, did not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours were the same for branches in low- and moderate-income geographies compared to branches in middle- and upper income geographies

### Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 68 qualified CD service activities to approximately 40 organizations logging 1,544 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 28 of these activities with 14 employees providing 1,166 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community service and economic development needs.

The following are examples of CD services provided in this AA:

- A bank employee served on the board of an economic development organization in Niles, MI. The employee provided 200 hours of service.
- Bank staff provided 32 financial education programs.

## State Ratings

### State of Florida

**CRA rating for the State of Florida:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans and overall distribution of loans by borrower income and businesses of different sizes were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes.

### Description of Institution's Operations in Florida

FTB delineated six AAs in Florida. They include a portion of Cape Coral-Fort Myers-Naples (Cape Coral) CSA; a portion of the Jacksonville MSA; the Miami- Fort Lauderdale-Pompano Beach (Miami) MSA in its entirety; a portion of the North Port-Sarasota (North Port) CSA; a portion of the Orlando-Lakeland-Deltona (Orlando) CSA; and a portion of the Tampa-St. Petersburg-Clearwater, FL (Tampa) MSA. Refer to appendix A for a complete list of the counties reviewed.

Florida was FTB's fifth largest rating area based on deposits. FTB had \$14.2 billion in deposits in these AAs, which represented 8.4 percent of the bank's total deposits. There were 149 FDIC-insured banks in the combined areas operating 3,570 branch offices. The bank ranked 12<sup>th</sup> in deposit market share with two percent. The top three competitors and their market share included Bank of America, N.A. (21.5 percent), Wells Fargo Bank, N.A. (13 percent), and Truist Bank (10 percent). FTB had 157 office locations and 393 ATMs within the combined areas. During the evaluation period, the bank made \$7.8 billion or 13.3 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Tampa MSA

The following table provides a summary of the demographics, including housing, business, and economic information for the Tampa MSA AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Tampa MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	701	5.8	24.8	35.4	31.7	2.3
Population by Geography	2,713,649	4.8	23.1	36.9	34.8	0.4
Housing Units by Geography	1,284,294	4.6	24.1	38.2	32.9	0.2
Owner-Occupied Units by Geography	682,598	2.1	20.2	38.2	39.4	0.1
Occupied Rental Units by Geography	392,451	8.8	28.4	38.2	24.1	0.4
Vacant Units by Geography	209,245	5.1	28.7	38.0	28.1	0.1
Businesses by Geography	514,490	4.3	19.7	33.1	42.6	0.3
Farms by Geography	11,620	3.4	22.9	37.6	36.0	0.1
Family Distribution by Income Level	654,604	21.3	17.6	18.8	42.3	0.0
Household Distribution by Income Level	1,075,049	23.8	16.1	17.3	42.8	0.0
Median Family Income MSA - 45300 Tampa-St. Petersburg-Clearwater, FL MSA		\$58,916	Median Housing Value			\$158,005
			Median Gross Rent			\$983
			Families Below Poverty Level			11.2%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%.</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The housing market in the Tampa, FL MSA is strong. Growth in the Gulf Coast of Florida was partially driven by out-of-towners from places like Chicago, New York, New Jersey, and Connecticut moving to the region and working remotely, as well as investors who may be buying second homes and planning to retire in the area. Together, these factors have increased pressure on overall housing inventory, which resulted in an increased number of renters in the area.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$29,458 and moderate-income families earned less than \$47,133. The median housing value in the AA is \$158,005. The NAR median sales price at the end of 2021 was \$330,000. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$736 for a low-income borrower and \$1,178 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$848. Based on these calculations, low-income borrowers and some moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 11.2 percent of families were living below the poverty level.

## **Economic Data**

According to Moody's Analytics, the Tampa area economy is recovering vigorously from the recession at a rate superior to the national recovery rate. By September 2021, payroll employment surpassed the metro area's pre-recession peak driven by a resurgence in professional services, transportation, and improving tourism. Longer-term strengths include low tax burdens and office rents, robust in-migration, and strong tourism. A key longer-term weakness is Tampa's exposure to shifts in the nation's business cycle due to its large tourism economic base and high living costs relative to income levels. Tourism in Tampa was more resistant to COVID-19 related lockdowns compared with its cross-state rivals. Area visitors are primarily drawn to its expansive beaches, which were less impacted by social distancing requirements. Housing prices are rising rapidly, and housing permits are increasing. Professional and business services, education and health services, government, and retail trade are important economic drivers. The largest employers are BayCare Health System, Publix Super Markets, Hillsborough County School District, HCA West Florida Division, and MacDill Air Force Base.

The unemployment rate for the Tampa MSA was 4.7 percent as of January 2017. Unemployment levels significantly increased from 5.5 percent in March 2020 to 13.9 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined with the unemployment rate at 3.3 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

The OCC completed a community contact in the Tampa MSA to better understand area credit and community needs. This contact focused on affordable housing development. The individual's organization has also focused on affordable housing for children aging out of the foster care system. The contact expressed a need for more affordable housing. The contact spoke about the need for increased affordable housing capacity, and also knowledge about programs in the community. The contact expressed that in addition to affordable housing, economic development needs to occur in low- and moderate-income areas to support business development and in turn local jobs. The greatest needs in the MSA include:

- Affordable housing.
- Economic development for small businesses.
- Program funding for organizations that work on affordable housing, temporary housing, and shelters.
- Technical assistance to small businesses.

## **Scope of Evaluation in Florida**

The Tampa MSA received a full-scope review. This area accounted for nearly 24 percent of deposits and 22 percent of lending within the state during the evaluation period. The remaining AAs received limited-scope reviews. FTB did not originate or purchase enough small loans to farms in the state of Florida to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA LENDING TEST**

The bank's performance under the Lending Test in the State of Florida is rated Outstanding. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Tampa MSA was excellent.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Tampa MSA	5,225	3,733	13	22	8,993	22.3	23.9
Cape Coral CSA	5,213	3,449	5	25	8,692	21.6	33.5
Jacksonville MSA	1,373	848	1	23	2,245	5.6	5.6
Miami MSA	3,515	1,173	0	21	4,709	11.7	5.8
North Port CSA	2,897	1,503	6	8	4,414	11.0	9.5
Orlando CSA	6,073	5,088	5	45	11,211	27.8	21.6
Total	24,296	15,794	30	144	40,264	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<b>Dollar Volume of Loans* (\$000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Tampa MSA	1,265,398	258,573	595	114,305	1,638,871	18.6	23.9
Cape Coral CSA	1,431,316	248,748	111	73,143	1,753,318	19.9	21.6
Jacksonville MSA	373,759	87,579	13	181,632	642,983	7.3	5.6
Miami MSA	1,299,394	186,866	0	357,907	1,844,167	21.0	5.8
North Port CSA	707,867	124,337	508	49,872	882,584	10.0	9.5
Orlando CSA	1,429,103	358,556	153	249,860	2,037,672	23.2	21.6
Total	6,506,837	1,264,659	1,380	1,026,719	8,799,595	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 3 percent and ranked seventh among 53 FDIC-insured banks, which placed it in the top 14 percent of banks.

The bank had a market share of one percent based on the number of home mortgage loans originated or purchased and ranked 25<sup>th</sup> among 1,148 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 17 percent were Rocket Mortgage (7.6 percent), United Wholesale Mortgage (5.7 percent), and Wells Fargo Bank, N.A. (3.7 percent).

The bank had a market share of 1.6 percent based on the number of small loans to businesses originated or purchased and ranked 14<sup>th</sup> out of 228 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 37.3 percent were American Express National Bank (14.9 percent), Bank of America, N.A. (14 percent), and JPMorgan Chase Bank, N.A. (8.4 percent).



## **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA and small loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was near both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans by all lenders. The bank's percentage of home mortgage loans in middle-income geographies was near the percentage of owner-occupied homes in those geographies but exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of State of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was near both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of State of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and exceeded the aggregate distribution of loans by all lenders.

The high cost of housing and the poverty level in the AA limited opportunities for home mortgage lending, particularly to low-income families.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 11.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Florida.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 22 CD loans totaling nearly \$114.3 million, which represented 33.9 percent of allocated tier 1 capital. CD loans were primarily made for revitalization/stabilization purposes. By dollar volume, 0.2 percent of these loans funded affordable housing, 14.3 percent funded economic development, 81.3 percent funded revitalization and stabilization efforts, and 4.1 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$17 million line of credit, enabling a telecommunications business to supplement greater payroll amounts for current and additional contract employees to respond to the declared disaster area caused by Hurricane Irma.
- \$4.7 million loan to a nonprofit organization that supports victims of domestic violence with emergency shelter, economic empowerment programs, and legal advocacy,
- \$2 million line of credit that enabled a business to retain jobs and expand its operations. The majority of the business's employees are low- and moderate-income persons.

## Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 159 loans under flexible lending programs specific to the AA totaling \$32.4 million. Program volumes include 80 FHA loans totaling \$15.7 million, 15 Freddie Mac HP loans totaling \$2.5 million, 14 Fannie Mae HR loans totaling \$2.1 million, one USDA/RA loans totaling \$175,000, 49 VA loans totaling \$12 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Miami MSA, North Port CSA, and the Orlando CSA was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance under the Lending Test in the Cape Coral CSA and Jacksonville MSA was weaker than the bank's overall performance because of weaker geographic distribution of loans. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

Refer to Tables O through T in the state of Florida section of appendix D for the facts and data supporting these conclusions.

## INVESTMENT TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in Florida was excellent.

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Tampa MSA	7	13,678	130	39,436	137	19.9	53,114	21.0	4	921
Cape Coral CSA	6	8,455	162	42,235	168	24.4	50,690	20.0	3	796
Jacksonville MSA	2	1,163	53	6,883	55	8.0	8,046	3.2	1	96
Miami MSA	9	7,677	63	26,274	72	10.4	33,951	13.4	1	209
North Port CSA	7	4,537	53	10,307	60	8.7	14,844	5.9	3	157
Orlando CSA	12	20,603	185	71,722	197	28.6	92,325	36.5	8	358
<b>Total</b>	<b>43</b>	<b>56,113</b>	<b>646</b>	<b>196,857</b>	<b>689</b>	<b>100</b>	<b>252,970</b>	<b>100</b>	<b>20</b>	<b>2,537</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

The bank made 130 investments totaling \$39.4 million during the evaluation period to approximately 80 organizations/projects. The dollar volume of current and prior period investments represented 15.8 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 89.5 percent of investments supported affordable housing, 9.1 percent funded community services to low- and moderate-income individuals, and 1.4 percent supported economic development. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$8.2 million investment in a 110-unit affordable apartment community in Dade City. Ninety percent of the units are set aside for residents earning up to 60 percent of the AMI and 10 percent of the units are set aside for residents earning up to 40 percent of the AMI.
- \$4.8 million investment in an 81-unit LIHTC senior rental housing complex in Valrico. Units are income restricted to residents earning less than 60 percent of the AMI. This was a public-private partnership that included Hillsborough County in financing the project.
- \$2.9 million in multiple donations to a foundation to support scholarships to low- and moderate-income students in pre-kindergarten to 12<sup>th</sup> grade.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Cape Coral CSA, Jacksonville MSA, Miami MSA, North Port CSA, and Orlando CSA was consistent with the bank's overall performance. Performance in the limited-scope areas supports the overall Investment Test rating.

## **SERVICE TEST**

The bank's performance under the Service Test in Florida is rated High Satisfactory.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Tampa MSA was excellent. Performance in limited-scope areas lowered the Service Test rating in the state.

## Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Tampa MSA	23.9	39	24.8	7.7	20.5	28.2	43.6	0.0	4.8	23.1	36.9	34.8	0.4
Cape Coral CSA	33.5	35	22.3	0.0	28.6	31.4	40.0	0.0	5.5	25.9	40.8	27.8	0.0
Jacksonville MSA	5.6	11	7.0	0.0	45.5	0.0	54.5	0.0	5.5	23.8	38.4	32.2	0.0
Miami MSA	5.8	9	5.7	11.1	22.2	11.1	55.6	0.0	5.8	28.9	31.5	33.4	0.4
North Port CSA	9.5	22	14.0	0.0	18.2	45.5	36.4	0.0	2.3	22.0	51.6	24.1	0.0
Orlando CSA	21.6	41	26.1	2.4	24.4	41.5	31.7	0.0	2.5	26.4	42.6	26.6	0.6

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was near the percentage of the population living within those geographies. Examiners gave positive consideration for two branches in middle- or upper-income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 78 ATMs in the AA, of which 42 were deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Tampa MSA	3	6	0	0	-2	-1	0
Cape Coral CSA	6	6	0	0	1	-1	0
Jacksonville MSA	1	1	0	0	-1	1	0
Miami MSA	2	0	0	0	1	1	0
North Port CSA	7	3	-1	1	2	2	0
Orlando CSA	2	5	0	-1	-2	0	0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. In the Tampa MSA AA, the bank opened three branches and closed six branches, all in middle- and upper income geographies. The branch closures were short distance consolidations due to reduction in branch transaction volumes.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch

hours were the same for branches in low- and moderate-income geographies compared to those in middle- and upper income geographies.

### **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 189 qualified CD service activities to 89 organizations logging 3,988 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 97 of these activities with employees providing 1,959 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

The following are examples of CD services provided in this AA:

- An employee of the bank served as board chair of a CDC. The employee provided 762 hours of service.
- Bank staff provided 69 financial education programs, which included eight YBC sessions to 225 students.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Miami MSA and Orlando CSA was consistent with the bank's overall performance under the Service Test in the full-scope area. Based on limited-scope reviews, the bank's performance under the Service Test in the Cape Coral CSA, Jacksonville MSA and North Port CSA was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope areas lowered the overall Service Test rating.

## State of Georgia

**CRA rating for the State of Georgia:** Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was good and the overall distribution of loans by borrower income and businesses of different sizes was adequate.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- FTB's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Georgia

FTB delineated two AAs in Georgia. They include a portion of the Atlanta-Sandy Springs-Alpharetta, GA (Atlanta) MSA and a portion of the Augusta-Richmond County, GA-SC (Augusta) MSA. Refer to appendix A for a complete list of the counties reviewed.

Georgia was FTB's 10<sup>th</sup> largest rating area based on total deposits. The bank had \$3.8 billion in deposits in the combined areas, which represented 1.7 percent of the bank's total deposits. The combined areas were served by 73 FDIC-insured banks operating 848 branches. FTB ranked 13<sup>th</sup> in deposit market share with 1.3 percent. The top three banks and their market share were Truist Bank (26.2 percent), Bank of America, N.A. (21.6 percent), and Wells Fargo Bank, N.A. (18.6 percent). FTB had 32 branches and 99 ATMs within the combined areas. During the evaluation period, the bank made \$1.7 billion or 2.9 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Atlanta MSA

The following table provides a summary of the demographics, including housing, business, and economic business information for the Atlanta MSA AA.

**Table A – Demographic Information of the Assessment Area****Assessment Area: Atlanta MSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	642	13.1	23.2	23.5	39.1	1.1
Population by Geography	3,561,038	9.4	23.0	27.3	39.9	0.4
Housing Units by Geography	1,439,831	10.5	23.7	25.8	39.7	0.2
Owner-Occupied Units by Geography	772,644	4.2	17.3	28.8	49.7	0.0
Occupied Rental Units by Geography	509,304	17.4	31.6	22.4	28.2	0.4
Vacant Units by Geography	157,883	19.3	30.2	22.2	28.1	0.2
Businesses by Geography	752,962	7.0	21.3	25.6	45.6	0.5
Farms by Geography	10,261	5.8	20.8	31.1	42.0	0.1
Family Distribution by Income Level	831,086	22.2	15.7	16.8	45.4	0.0
Household Distribution by Income Level	1,281,948	23.2	15.8	16.8	44.2	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$67,322	Median Housing Value			\$208,576
			Median Gross Rent			\$1,029
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%.</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$33,661 and moderate-income families earned less than \$53,858. The median housing value in the AA is \$208,576. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$842 for a low-income borrower and \$1,346 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,043. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 11.6 percent of families were living below the poverty level.

### **Economic Data**

According to Moody's Analytics, the Atlanta economy is recovering vigorously from the recession at a rate superior to that of the nation. Payrolls are growing at an above average rate and jobs recovery relative to the pre-pandemic peak is outperforming most of Atlanta's peers among the nation's 25 largest metro areas. The recovery is fueled by gains in logistics and professional and business services. Longer-term strengths include having a diverse economy, being a distribution center, business friendliness, and good net in-migration. Longer-



term weaknesses include over-priced housing and strained infrastructure. Housing prices are rising rapidly and are over-valued. Housing permits are increasing. Professional and business services, education and health services, government, and retail trade are important economic drivers. The largest employers are Delta Air Lines, Emory University/Emory Healthcare, The Home Depot, Northside Hospital, and Piedmont Healthcare.

The unemployment rate was 5.2 percent as of January 2017. Unemployment levels significantly increased from 3.7 percent in March 2020 to 12.6 percent in April 2020 due to the impacts of COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the Atlanta MSA was 2.3 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

### **Community Contacts**

As part of the CRA evaluation, the OCC reviewed information from three community contacts made during the evaluation period to better understand area credit and community needs. All three contacts worked in economic and CD organizations. The contacts raised a wide range of needs in each interview. However, the contacts consistently outlined the importance of CD services and their positive impact in the MSA. Contacts also described how CD services could have the greatest impact in the metro area by focusing activities on communities located south of the Interstate 20 corridor. The greatest needs in the MSA are:

- Financial literacy classes for both individuals and small business owners.
- Accounting classes for small business owners.
- Technical assistance for small businesses in establishing effective financial management practices.
- Small business credit, including micro-loans generally under \$100,000.
- Affordable housing; and
- Workforce development training.

### **Scope of Evaluation in Georgia**

The Atlanta MSA received a full-scope review. This area accounted for over 90 percent of the deposits and nearly 95 percent of the lending in the state during the evaluation period. The Augusta MSA received a limited-scope review. FTB did not originate or purchase enough small loans to farms in the state of Georgia to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA**

### **LENDING TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Atlanta MSA was good. Performance in the limited-scope area supported the overall Lending Test rating.

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Atlanta MSA	4,559	1,879	1	29	6,468	94.5	90.3
Augusta MSA	281	96	0	1	378	5.5	9.7
Total	4,840	1,975	1	30	6,846	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<b>Dollar Volume of Loans* (\$000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Atlanta MSA	1,381,376	236,363	9	153,964	1,771,712	97.2	90.3
Augusta MSA	38,292	8,462	0	3,496	50,250	2.8	9.7
Total	1,419,667	244,825	9	157,460	1,821,961	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 1.1 percent and ranked 15<sup>th</sup> among 81 FDIC-insured banks, which placed it in the top 19 percent of banks.

The bank had a market share of 0.8 percent based on the number of home mortgage loans originated or purchased and ranked 31<sup>st</sup> of 883 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders with a combined market share of 16.6 percent were Rocket Mortgage (9 percent), United Wholesale Mortgage (3.9 percent), and Truist Bank (3.7 percent).

The bank had a market share of 0.5 percent based on the number of small loans to businesses originated or purchased and ranked 25<sup>th</sup> of 296 small business lenders, which placed it in the top 9 percent of lenders. The top three lenders with a combined market share of 43.2 percent were American Express National Bank (18.4 percent), Bank of America, N.A. (13.4 percent), and Wells Fargo Bank, N.A. (11.4 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA and small loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies approximated the percentage of owner-occupied homes in low-income geographies and equaled the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in moderate-income geographies but equaled the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but approximated the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an adequate distribution of loans among individuals of different income levels and business of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but was near to the aggregate distribution of loans by all lenders.

The cost of housing and the poverty level of the AA limited opportunities for home mortgage lending, particularly to low-income families.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 12 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small

loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Georgia.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 29 CD loans totaling nearly \$154 million, which represented 61.7 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 52.2 percent funded economic development, 39.9 percent of these loans funded affordable housing, 6.2 percent funded revitalization and stabilization efforts, and 1.6 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$42.5 million loan to construct a 238-unit senior housing facility in Stonecrest. The units are income restricted to 30 to 80 percent of the AMI. The project is backed by revenue bonds issued by the city's public housing authority.
- \$12 million loan to construct a 78-unit LIHTC senior housing complex in Kennesaw, GA. Fifty-eight of the units are income restricted to 50 and 60 percent of AMI, with the remaining 20 units at market rate.
- \$3.6 million PPP loan to a distribution warehouse located in a moderate-income geography in Atlanta. The loan allowed the company to meet critical business needs during the COVID-19 pandemic.

## **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, the bank originated or purchased 151 loans under flexible lending programs totaling \$34.2 million. Program volumes include one 53 Community Mortgage loan totaling \$175,000, 110 FHA loans totaling \$24.2 million, 16 Freddie Mac HP loans totaling \$3.6 million, four Fannie Mae HR loans totaling \$760,000, and 20 VA loans totaling \$5.5 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the Augusta MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the limited-scope areas supported the overall Lending Test rating.

Refer to Tables O through T in the state of Georgia section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The institution's performance under the Investment Test in Georgia is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the institution's performance in Georgia is excellent.

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Atlanta MSA	4	17,262	173	33,204	177	85.1	50,466	91.3	1	193
Augusta MSA	2	4,706	29	116	31	14.9	4,822	8.7	1	546
<b>Total</b>	<b>6</b>	<b>21,968</b>	<b>202</b>	<b>33,320</b>	<b>208</b>	<b>100</b>	<b>55,288</b>	<b>100</b>	<b>2</b>	<b>739</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

The bank made 173 investments totaling \$33.2 million during the evaluation period to approximately 107 organizations/projects. The dollar volume of current and prior period investments represented 20.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing and economic development. By dollar volume, 92.3 percent of investments supported affordable housing, 4.5 percent supported economic development, 2.8 percent funded community services to low- and moderate income- individuals, and 0.4 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$18.1 million investment in a 354-unit LIHTC development with all units subsidized through a HUD Section 8 rental subsidy contract.
- \$1 million investment to a CDFI loan fund serving low-income communities within the Atlanta metro area. The fund provides loans to small businesses, primarily minority- and women-owned, that would not qualify for traditional bank financing.
- \$300,000 to a nonprofit organization that provides credit and money management, homeownership counseling, and small business programs to low- and moderate-income individuals and communities.

## Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Augusta MSA is consistent with the bank's overall performance in the full-scope area. Performance in the limited-scope area supported the overall Investment Test rating.

## SERVICE TEST

The bank's performance under the Service Test in Georgia is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

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

## Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Atlanta MSA	90.3	30	93.8	10.0	20.0	26.7	43.3	0.0	13.1	23.2	23.5	39.1	1.1
Augusta MSA	9.7	2	6.2	0.0	50.0	0.0	50.0	0.0	16.4	22.4	34.3	26.9	0.0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low- and moderate-income geographies was near the percentage of the population living within those geographies. Examiners gave positive consideration for three branches in middle- or upper-income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 97 ATMs in the AA, of which 37 were deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Atlanta MSA	6	4	1	2	0	-2	1
Augusta MSA	0	1	0	0	0	-1	0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened six branches, one of which was in a low-income geography and

two in moderate-income geographies. The bank closed four branches, all in middle- and upper income geographies. The branch closures were short distance consolidations due to reductions in branch transaction volumes.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AAs, particularly low- and moderate-income geographies and/or individuals. Average hours for branches in low- and moderate-income geographies were comparable to those in middle- and upper income branches.

### **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 181 qualified CD service activities to over 80 organizations logging 3,009 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 53 of these activities with 12 employees providing 1,218 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

The following are examples of CD services provided in this AA:

- An employee of the bank served on the board of a youth advocacy organization serving low- and moderate-income students in the metro Atlanta area. The employee provided 80 hours of service.
- Bank staff provided 85 financial education programs, which included five YBC sessions to nearly 150 students.

### **Conclusions for the Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Service Test in the Augusta MSA was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

## State of Illinois

**CRA rating for the State of Illinois<sup>7</sup>:** Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Needs to Improve

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was poor, and overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an adequate level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Illinois

FTB delineated three AAs in Illinois. They include a portion of the Carbondale-Marion, IL (Carbondale) MSA, a portion of the Rockford, IL (Rockford) MSA, and three Non-MSA (IL Non-MSA) counties within the state. The three Non-MSA counties were combined as one AA for analysis and presentation. The state rating does not include the counties in the Chicago CSA that were reviewed as part of the MMSA ratings. Refer to appendix A for a complete list of the counties reviewed.

Illinois was FTB's 15<sup>th</sup> largest rating area based on total deposits. The bank had approximately \$512 million in deposits in the combined areas, which represented 0.3 percent of total deposits. The combined areas were served by 61 FDIC-insured banks operating 195 branches. The top three banks and their deposit market shares were Midland States Bank (11.4 percent), Illinois Bank and Trust (8.1 percent) and JPMorgan Chase Bank, N.A. (6.5 percent). FTB had seven branches and 10 ATMs. During the evaluation period, the bank originated \$119.1 million or 0.2 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

The following table provides a summary of the demographics, including housing, business, and economic information for the IL Non-MSA AA.

---

<sup>7</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.



Illinois Non-MSA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: IL Non-MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	37	2.7	16.2	59.5	21.6	0.0
Population by Geography	130,435	1.3	13.0	61.6	24.1	0.0
Housing Units by Geography	57,350	1.4	14.0	60.7	23.9	0.0
Owner-Occupied Units by Geography	39,423	0.5	12.8	60.7	26.1	0.0
Occupied Rental Units by Geography	12,732	3.1	16.6	62.0	18.3	0.0
Vacant Units by Geography	5,195	3.8	16.8	57.9	21.4	0.0
Businesses by Geography	8,807	4.4	9.6	56.1	29.8	0.0
Farms by Geography	721	0.4	3.5	63.7	32.5	0.0
Family Distribution by Income Level	34,095	18.4	18.4	22.5	40.7	0.0
Household Distribution by Income Level	52,155	22.4	16.5	18.0	43.1	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$105,538
			Median Gross Rent			\$605
			Families Below Poverty Level			9.2%

*Source: 2015 ACS and 2021 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.*

According to Moody’s Analytics, Illinois’ economy is gaining momentum, leading the region, and slightly edging out the U.S. in job growth. Manufacturing employment is slowly increasing. Inflation and wage pressures are in line with those nationally, although there is some variation across economies. Supply-chain stresses are having the biggest impact in areas with a high concentration of manufacturing, exports, or both. Factories will keep running at full capacity, limited only by labor and logistical challenges. The recent “Beige Book” report indicated that business is at or above pre-pandemic levels. Fabricated metal products and heavy machinery, which are important to the state, are in high demand.

Unprecedented federal support to the economy increased tax collections, and Illinois has more money to put to work than it has had in many years. The state promptly repaid a Federal Reserve loan, is reducing its backlog of unpaid bills, and has a budget surplus. These developments helped Illinois draw upgrades to its credit rating from multiple ratings agencies. Government spending is expected to rebound aggressively in the next couple of years as federal stimulus and infrastructure funds flow to states and cities. The windfall is earmarked for patching budget holes and one-time projects; there will not be a significant bump in government jobs.

### **Scope of Evaluation in Illinois**

The IL Non-MSA AA received a full-scope review. This area accounted for nearly 50 percent of the deposits and 47 percent of the lending in the state during the evaluation period. The Carbondale MSA and Rockford CSA AAs received limited-scope reviews. FTB did not originate or purchase enough small loans to farms in the limited scope areas of the state of Illinois to conduct a meaningful analysis.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Illinois Non-MSA is good. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
IL Non-MSA	422	138	27	7	594	47.0	49.8
Carbondale MSA	138	16	2	0	156	12.4	36.4
Rockford CSA	331	179	0	3	513	40.6	13.8
Total	891	333	29	10	1,263	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<b>Dollar Volume of Loans* (\$000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
IL Non-MSA	38,817	16,094	1,570	39,409	95,890	56.0	49.8
Carbondale MSA	12,553	3,094	24	0	15,671	9.2	36.4
Rockford CSA	29,449	17,450	0	12,739	59,638	34.8	13.8
Total	80,818	36,638	1,594	52,148	171,199	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 5.1 percent and ranked seventh among 30 FDIC-insured banks, which placed it in the top 24 percent of banks.

The bank had a market share of 3.3 percent based on the number of home mortgage loans originated or purchased and ranked eighth among 233 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders with a combined market share of 24.3 percent were U.S. Bank, N.A. (9.7 percent), Dieterich Bank (8.1 percent), and Rocket Mortgage (6.5 percent).

The bank had a market share of 2.8 percent based on the number of small loans to businesses originated or purchased and ranked 10<sup>th</sup> out of 73 small business lenders, which placed it in the top 14 percent of lenders. The top three lenders with a combined market share of 33.6 percent were Midland States Bank (12.1 percent), First Mid Bank and Trust, N.A. (12 percent), and American Express National Bank (9.4 percent).

The bank had a market share of 1.3 percent based on the number of small loans to farms originated or purchased and ranked 11<sup>th</sup> out of 20 small farm lenders, which placed it in the top 55 percent of lenders. The top three

lenders with a combined market share of 55.9 percent were John Deere Financial, F.S.B. (22.5 percent), First Mid Bank and Trust, NA (20.3 percent), and Banterra Bank (13.1 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited a poor geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

Refer to Table O in the state of Illinois Non-MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was significantly below both the percentage of owner-occupied homes in moderate-income geographies and the aggregate distribution of loans by all lenders.

#### ***Small Loans to Businesses***

Refer to Table Q in the state of Illinois Non-MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans by all lenders.

#### ***Small Loans to Farms***

Refer to Table S in the state of Illinois Non-MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank made no small loans to farms in low- or moderate-income geographies.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.

#### ***Home Mortgage Loans***

Refer to Table P in the state of Illinois Non-MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

#### ***Small Loans to Businesses***

Refer to Table R in the state of Illinois Non-MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 15.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

#### ***Small Loans to Farms***

Refer to Table T in the state of Illinois Non-MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 40.7 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of \$1 million or less was well below the percentage of farms with gross annual revenues of \$1 million or less but was near the aggregate distributions of small loans to farms by all lenders.

## Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Illinois.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made seven CD loans totaling nearly \$39.4 million, which represented 156.1 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 92.4 percent funded economic development and 7.6 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$15.7 million loan to an employee-owned manufacturer and rebuilder of railroad equipment located in a moderate-income geography in Mount Vernon, IL. The loan assisted in creating and retaining jobs for low- and moderate-income individuals.
- \$1.5 million loan (and renewed during the evaluation period) to a nonprofit organization that provides community services including group housing and job training to low- and moderate-income persons with disabilities.

## Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 36 loans under flexible lending programs specific to the AA totaling \$4.5 million. Program volumes include 17 FHA loans totaling \$2.1 million, two Freddie Mac HP loans totaling \$137,000, two Fannie Mae HR loans totaling \$161,000, four USDA/RA loans totaling \$388,000, and 11 VA loans totaling \$1.7 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Carbondale MSA was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the Rockford MSA was stronger than the bank's overall performance under the Lending Test in the full-scope area due to better geographic distributions. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

Refer to Tables O to T in the state of Illinois section in appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The institution's performance under the Investment Test in Illinois is rated Needs to Improve.

Based on a full-scope review, FTB's performance in Illinois was poor.

### Number and Amount of Qualified Investments

The institution has a poor level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
IL Non-MSA	1	85	24	39	25	47.1	124	27.7	0	0
Carbondale MSA	1	58	7	6	8	15.1	64	14.3	0	0
Rockford, IL MSA	2	62	18	197	20	37.8	259	57.9	2	4
Total	4	205	49	242	53	100.0	447	100.0	2	4

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

The bank made 24 investments totaling \$39,000 during the evaluation period to approximately eight organizations. The dollar volume of current and prior period investments represented 0.5 percent of allocated tier 1 capital. There are extremely limited opportunities to finance affordable housing within this AA. Per the Illinois Housing Development Authority, between 2017 to 2019, only one LIHTC was awarded in the bank's AA.

The institution exhibited poor responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for economic development and community services to low- and moderate-income individuals. By dollar volume, 65 percent supported economic development and 35 percent funded community services to low- and moderate-income individuals. The institution did not use innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- \$1,500 donation to a nonprofit agency that develops, implements, and evaluates social services programs to assist economically and socially disadvantaged individuals, including homeless services, foreclosure prevention, and homebuyer/owner education.
- \$1,500 donation to a foundation that provides healthcare to the underserved in the Sauk Valley. The foundation offers transportation assistance program, pediatric mental health services, and a medication assistance program.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance under the Investment Test in the Carbondale MSA and Rockford, IL MSA AAs was consistent with the bank's overall performance in the full-scope area. Performance in the limited-scope areas supported the overall Investment Test rating.

## SERVICE TEST

The bank's performance under the Service Test in Illinois is rated High Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the IL Non-MSA was excellent. Performance in the limited-scope areas lowered the Service Test rating in Illinois.

### Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
IL Non-MSA	49.8	3	42.9	0.0	33.3	33.3	33.3	0.0	1.3	13.0	61.6	24.1	0.0
Carbondale MSA	13.8	1	14.3	0.0	0.0	100.0	0.0	0.0	0.0	20.0	53.3	26.7	0.0
Rockford CSA	36.4	3	429	0.0	33.3	33.3	33.3	0.0	15.6	23.3	32.2	26.7	2.2

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. Although the bank did not have any branches in low-income geographies, a low percentage of the AA population lives in those geographies. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had three deposit-taking ATMs in the AA.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
IL Non-MSA	0	1	0	0	-1	0	0
Carbondale MSA	0	0	0	0	0	0	0
Rockford CSA	0	1	-1	0	0	0	0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed one branch, which was in a middle-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours of

branches in low- and moderate-income geographies exceeded the hours of branches in middle- and upper income geographies.

### **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 29 qualified CD service activities to 10 organizations logging 755 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 24 of these activities with six employees providing 538 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

The following are examples of CD services provided in this AA:

- An employee served on a board committee of a community foundation that provides grants to CD organizations throughout the AA. The employee provided 200 hours of service.
- A bank employee served on the board of an economic development organization and provided 130 hours of service.
- Bank employees provided five financial and technical assistance sessions.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Carbondale MSA was consistent with the bank's overall performance under the Service Test in the full-scope area. Performance in the Rockford CSA was weaker than the bank's overall performance under the Service Test in the full-scope area due to poorer branch distributions. Performance in the limited-scope areas lowered the overall Service Test rating.



## State of Indiana

**CRA rating for the State of Indiana<sup>8</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was good and the overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- FTB's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Indiana

FTB delineated six AAs in the state of Indiana. They included portions of the Bloomington, IN (Bloomington) MSA, Fort Wayne-Huntington-Auburn, IN (Fort Wayne) CSA, Indianapolis-Carmel-Anderson, IN (Indianapolis) MSA, Lafayette-West Lafayette-Frankfort, IN (Lafayette) MSA, Terre-Haute MSA, and nine Non-MSA (IN Non-MSA) counties. The Non-MSA counties were combined as one AA for analysis and presentation. The state of Indiana rating does not include the counties included in the Chicago CSA, Cincinnati CSA, Evansville MMSA, Louisville MMSA, or South Bend CSA AA that were included in the MMSA analyses. Refer to the table in appendix A for a list of counties reviewed.

Indiana was FTB's sixth largest rating area based on total deposits. FTB had \$8.9 billion in deposits in the combined AAs, which represented 5.3 percent of its total deposits. There were 79 FDIC-insured banks operating 789 branch offices in the combined areas. FTB ranked third with 8.9 percent deposit market share. The top two banks and their market share ahead of FTB were JPMorgan Chase Bank, N.A. (19.8 percent) and PNC Bank N.A. (10.8 percent). FTB operated 69 branches and 104 ATMs. During the evaluation period, the bank originated nearly \$3.5 billion or 5.9 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Indianapolis CSA

The following table provides a summary of the demographics, including housing, business, and demographic information for the Indianapolis CSA AA.

---

<sup>8</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area

**Table A – Demographic Information of the Assessment Area****Assessment Area: Indianapolis CSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	364	16.8	26.6	30.5	25.8	0.3
Population by Geography	1,827,961	10.9	22.1	31.5	35.3	0.1
Housing Units by Geography	777,470	12.4	24.0	30.7	32.7	0.2
Owner-Occupied Units by Geography	449,779	6.2	16.5	35.0	42.3	0.1
Occupied Rental Units by Geography	245,783	19.3	35.3	25.3	19.8	0.2
Vacant Units by Geography	81,908	25.8	31.3	23.9	18.6	0.4
Businesses by Geography	220,160	10.9	20.8	29.7	38.5	0.1
Farms by Geography	6,082	6.1	14.7	40.2	38.9	0.1
Family Distribution by Income Level	451,047	21.8	17.0	19.5	41.8	0.0
Household Distribution by Income Level	695,562	23.5	16.3	17.7	42.6	0.0
Median Family Income MSA - 18020 Columbus, IN MSA		\$66,425	Median Housing Value			\$145,644
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Gross Rent			\$834
Median Family Income Non-MSAs - IN		\$55,715	Families Below Poverty Level			10.7%

Source: 2015 ACS and 2021 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.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$33,402 and moderate-income families earned less than \$53,442. The median housing value in the AA is \$145,644. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$835 for a low-income borrower and \$1,336 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$771.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 10.7 percent of families were living below the poverty level.

### **Economic Data**

According to Moody's Analytics, the Indianapolis economy benefits from manufacturing that has rebounded above its pre-pandemic high, a diversified industrial structure and distribution network, and a growing pharmaceutical industry. These business sectors are supported by strong migration trends into the metro area and a low cost of doing business. Warehousing and transportation companies continue to invest in the metro area given its central location in the United States for movement of freight. Amazon, Bastian, and FedEx are all

upgrading facilities. Items presenting potential headwinds for the Indianapolis economy include rising housing prices and higher than average exposure to the public sector because of state government employment. Top employers include Indiana University Health, St. Vincent Hospitals & Health Services, Community Health Network, Eli Lilly and Company, and Walmart.

The unemployment rate for the Indianapolis CSA was 4.1 percent as of January 2017. Unemployment levels significantly increased from 3.3 percent in March 2020 to 12.8 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined and the unemployment rate for the Indianapolis CSA was 1.2 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

As part of the CRA evaluation, the OCC reviewed two recently completed community contacts within the Indianapolis CSA to better understand area credit and community needs. One contact worked for an economic development organization while the other worked for a CDFI. Contacts expressed a wide range of needs in the MSA and described how COVID-19 had an impact on the MSA. The greatest needs in the MSA include:

- Affordable housing throughout the metro area, including in northern suburbs.
- Investments in Indianapolis Public School District schools.
- Social service programs that benefit low- and moderate-income individuals.
- Financial literacy classes.
- Childcare and afterschool programs for low- and moderate-income children.
- Workforce development programs.
- Micro-loans between \$5,000 and \$15,000 to entrepreneurs and small businesses.
- Access to no balance and no- or low-fee checking accounts.

## **Scope of Evaluation in Indiana**

The Indianapolis CSA AA received a full-scope review. This area accounted for 78 percent of the state deposits and 62 percent of the lending in the state during the evaluation period. The remaining AA received a limited-scope review. FTB originated or purchased enough small loans to farms only in the Indianapolis CSA and the Indiana non-MSA AAs to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA**

### **LENDING TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Indianapolis CSA was excellent. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

## Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Indianapolis CSA	11,997	3,638	36	67	15,738	62.4	78.4
Bloomington MSA	575	187	2	0	764	3.0	2.3
Fort Wayne CSA	3,277	448	3	5	3,733	14.8	4.8
Lafayette MSA	355	99	0	2	456	1.8	1.6
Terre Haute MSA	1,499	218	18	5	1,740	6.9	3.2
IN Non-MSA	2,350	417	31	2	2,800	11.1	9.7
Total	20,053	5,007	90	81	25,231	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<b>Dollar Volume of Loans* (\$000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Indianapolis CSA	1,962,265	399,409	1,390	129,730	2,492,794	67.6	78.4
Bloomington MSA	91,097	17,076	40	0	108,213	2.9	2.3
Fort Wayne CSA	501,850	36,252	48	20,112	558,262	15.1	4.8
Lafayette MSA	47,992	7,407	0	10,014	65,413	1.8	1.6
Terre Haute MSA	122,883	12,152	458	47,594	183,087	5.0	3.2
IN Non-MSA	236,129	36,336	1,445	3,874	277,784	7.5	9.7
Total	2,962,215	508,632	3,381	211,324	3,685,552	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 9.3 percent and ranked third among 44 FDIC-insured banks, which placed it in the top 7 percent of banks.

The bank had a market share of 2.5 percent based on the number of home mortgage loans originated or purchased and ranked 10<sup>th</sup> among 680 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 14.7 percent were Caliber Home Loans, Inc. (5.5 percent), Rocket Mortgage (5.4 percent), and JPMorgan Chase Bank, N.A. (3.7 percent).

The bank had a market share of 3.5 percent based on the number of small loans to businesses originated or purchased and ranked 7<sup>th</sup> out of 217 small business lenders, which placed it in the top 4 percent of lenders. The top three lenders with a combined market share of 31.6 percent were JPMorgan Chase Bank, N.A. (14 percent), American Express National Bank (10.6 percent), and PNC Bank N.A. (7 percent).

Small loans to farms market share is based on 2020 peer lending data, which was the most recent information available at the time of the evaluation. The bank had no market share because FTB did not originate or purchase any small loans to farms in calendar year 2020.

## Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic

information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in both low- and moderate-income geographies was near the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in low-income geographies and was below the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income was below the percentage of businesses in moderate-income geographies and approximated the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms in those geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 11.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 22.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Indiana.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 67 CD loans totaling nearly \$289.5 million, which represented 41.8 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 22.3 percent of these loans funded affordable housing, 44.8 percent funded economic development, 29 percent funded revitalization and stabilization efforts, and 3.9 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$55 million loan that supported the revitalization of a neighborhood through the redevelopment of a divested manufacturing site in a low- and moderate-income community. The loan was made to a municipal corporation that issues bonds and notes to various qualified entities in the city of Indianapolis and Marion County.
- \$6.5 million construction loan to support a 61-unit LIHTC project that will include 15 units set aside for homeless veterans. The remaining units are income restricted to persons earning between 30 and 80 percent of the AMI. The project used multiple layers of financing including payment in lieu of taxes, tax credits, and equity investment.
- \$3.2 million PPP loan to an employee-owned plastic manufacturing plant located in a moderate-income geography to support operations during the COVID-19 pandemic.

### **Product Innovation and Flexibility**

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 951 loans under flexible lending programs specific to the AA totaling \$138.3 million. Program volumes included, 32 53 Community Mortgage loans totaling \$4.4 million, 481 FHA loans totaling \$70.2 million, 225 Freddie Mac HP loans totaling \$29.4 million, 67 Fannie Mae HR loans totaling \$9 million, two Fannie Mae RN loans totaling \$188,000, 18 USDA/RA loans totaling \$1.7 million, and 126 VA loans totaling \$23.5 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lafayette MSA, Terre Haute MSA, and IN Non-MSA was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the Bloomington MSA and Fort Wayne CSA was weaker than the bank's overall performance under the Lending Test in the full-scope area because of weaker geographic distribution of loans and/or lower volume of CD lending. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

Refer to Tables O to T in the state of Indiana in appendix D for the facts and data supporting these conclusions.

### **INVESTMENT TEST**

The institution's performance under the Investment Test in Indiana is rated Outstanding. Performance in the limited-scope areas supported the overall Investment Test rating.

Based on a full-scope review, the institution's performance in Indiana was excellent.

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Indianapolis CSA	31	18,520	249	52,879	280	59.7	71,399	54.3	28	1,565
Bloomington MSA	3	2,523	27	4,850	30	6.4	7,373	5.6	3	536
Fort Wayne CSA	8	3,284	38	6,584	46	9.8	9,868	7.5	6	258
Lafayette MSA	1	2,452	18	8,428	19	4.1	10,880	8.3	1	759
Terre-Haute MSA	3	1,057	31	11,238	34	7.2	12,295	9.4	3	69
In Non-MSA	7	5,894	53	13,701	60	12.8	19,595	14.9	6	219
Total	53	33,730	416	97,680	469	100	131,410	100	47	3,406

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

The bank made 249 investments during the evaluation period totaling \$52.9 million to over 150 organizations/projects. The dollar volume of current and prior period investments represented 10.3 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing and economic development. By dollar volume, 79.9 percent of investments supported affordable housing, 16.5 percent supported economic development, 3.3 percent funded community services to low- and moderate-income individuals, and 0.3 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$10.5 million equity investment for the construction of a 61-unit affordable housing community supported with housing tax credits, with 15 units set aside for homeless veterans. The apartments are income restricted to residents who earn 30 to 80 percent of the AMI.
- \$9.6 million for a 60-unit affordable senior housing complex. All units are restricted to households earning at or below 60 percent of the AMI.
- \$4 million for a LIHTC project consisting of 51 units. Rent is capped at 30 percent of the AMI through HUD's rental assistance program.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington MSA, Fort Wayne CSA, Lafayette MSA, Terre Haute MSA, and IN Non-MSA AAs was consistent with the bank's



overall performance in the full-scope area. Performance in the limited-scope areas supported the overall Investment Test rating.

## SERVICE TEST

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

Based on a full-scope review, the bank's performance in the Indianapolis CSA was excellent. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

## Conclusions for Area Receiving a Full-Scope Review

### Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Indianapolis CSA	78.4	43	62.3	11.6	32.6	23.3	32.6	0.0	10.9	22.1	31.5	35.3	0.1
Bloomington MSA	2.3	3	44.3	0.0	33.3	33.3	33.3	0.0	9.7	18.5	34.8	32.4	4.6
Fort Wayne CSA	4.8	8	11.6	12.5	12.5	62.5	12.5	0.0	8.9	16.3	48.0	26.1	0.6
Lafayette MSA	1.6	2	2.9	50.0	0.0	0.0	50.0	0.0	6.1	18.7	31.0	35.1	9.2
Terre Haute MSA	3.2	2	7.2	0.0	20.0	60.0	20.0	0.0	4.4	19.3	47.6	28.7	0.0
IN Non-MSA	9.7	8	11.6	0.0	25.0	37.5	37.5	0.0	0.0	10.6	62.8	26.6	0.0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low- and moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 59 ATMs in the AA, of which 53 were deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Indianapolis CSA	2	3	0	-1	1	-1	0
Bloomington MSA	0	0	0	0	0	0	0
Fort Wayne CSA	1	3	0	-1	-1	0	0
Lafayette MSA	0	2	0	-1	-1	0	0
Terre Haute MSA	0	3	0	0	-3	0	0
IN Non-MSA	0	5	0	0	-4	-1	0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened two branches in middle- and upper income geographies. The bank closed three branches, one in a moderate-income geography and two in upper income geographies. The branch closures were short distance consolidations due to reductions in branch transaction volumes.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours at branches in low- and moderate-income geographies were comparable to branches in middle- and upper income geographies.

### Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 169 qualified CD service activities to over 70 organizations logging 7,215 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 89 of these activities with 35 employees providing 3,827 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

The following are examples of CD services provided in this AA:

- An employee served on the board of an organization that provides housing and financial assistance to victims of domestic violence. The employee provided 968 hours of service.
- Bank staff provided 47 financial education programs, including 14 YBC sessions to 600 students.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the IN Non-MSA AA was consistent with the bank's overall performance under the Service Test in the full-scope area. Performance in the Bloomington MSA, Fort Wayne CSA, Lafayette MSA, and Terre Haute MSA AAs was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

## State of Kentucky

**CRA rating for the State of Kentucky<sup>9</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was good, and the overall distribution of loans by borrower income and businesses of different sizes was good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. FTB made a good level of qualified investments, grants, and donations.
- FTB's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Kentucky

FTB delineated three AAs in Kentucky. They include a portion of the Lexington-Fayette-Richmond-Frankfurt (Lexington) CSA, Owensboro MSA in its entirety, and two Non-MSA (KY Non-MSA) counties. The Non-MSA counties were combined into one AA for analysis and presentation. The state rating does not include the counties in the Charleston CSA, Cincinnati CSA, Evansville MMSA, and Louisville MMSA that were reviewed as part of the MMSA analyses. Refer to appendix A for a list of counties reviewed.

Kentucky was FTB's 12<sup>th</sup> largest rating area based on total deposits. The bank had nearly \$2.1 billion in deposits in the combined areas, which represented 1.2 percent of its deposits. The combined areas were served by 49 FDIC-insured banks operating 291 branches. FTB ranked third with 9.6 percent deposit market share. The top two banks and their market share were JPMorgan Chase Bank, N.A. (11.9 percent) and Central Bank and Trust Company (10 percent). FTB had 22 branches and 37 ATMs. During the evaluation period, the bank made \$974.9 million or 1.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Lexington CSA

The following table provides a summary of the demographics, including housing, business, and economic business information for the Lexington CSA AA.

---

<sup>9</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area

**Table A – Demographic Information of the Assessment Area****Assessment Area: Lexington CSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	141	7.1	21.3	37.6	34.0	0.0
Population by Geography	564,441	6.4	20.9	37.5	35.2	0.0
Housing Units by Geography	245,710	6.6	21.5	37.9	34.0	0.0
Owner-Occupied Units by Geography	129,987	3.3	15.6	37.5	43.6	0.0
Occupied Rental Units by Geography	93,462	10.5	29.1	38.0	22.5	0.0
Vacant Units by Geography	22,261	9.1	24.3	39.7	26.9	0.0
Businesses by Geography	59,145	4.9	17.7	39.3	38.1	0.0
Farms by Geography	2,574	3.3	12.5	42.1	42.1	0.0
Family Distribution by Income Level	138,304	22.0	15.0	18.7	44.3	0.0
Household Distribution by Income Level	223,449	24.4	14.7	16.0	45.0	0.0
Median Family Income MSA - 30460 Lexington-Fayette, KY MSA		\$66,800	Median Housing Value			\$169,496
Median Family Income Non-MSAs - KY		\$45,986	Median Gross Rent			\$752
			Families Below Poverty Level			12.4%

*Source: 2015 ACS and 2021 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.*

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$33,400 and moderate-income families earned less than \$53,440. The median housing value in the AA is \$169,496. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$835 for a low-income borrower and \$1,336 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$953. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 12.4 percent of families were living below the poverty level.

### **Economic Data**

According to Moody's Analytics, manufacturing and the presence of the University of Kentucky are important economic drivers. The local economy benefits from low business costs, the University's presence, and an educated workforce. The Lexington area also benefits from having abundant developable land relative to other metropolitan areas throughout the United States. Automobile manufacturing occurs at Toyota's Georgetown, KY plant located just outside of Lexington city limits. Supply chain issues with semi-conductors have hampered

output, but robust consumer demand for automobiles will preserve manufacturing jobs in this area. Housing prices have increased as demand outpaces the supply of single-family homes. The University's presence and number of college students makes Lexington highly dependent on multifamily housing. This has contributed to the market for single-family homes being undersupplied while demand is surging. Potential weaknesses for this economy include reliance on state government spending. Lexington's close proximity to Kentucky's state capital in Frankfort could impact the economy beyond fiscal tightening with university spending. Top employers include the University of Kentucky, Baptist Health, Conduent, Veterans Medical Center, and Catholic Health Initiatives.

The unemployment rate for the Lexington MSA was 4.1 percent as of January 2017. Unemployment levels significantly increased from 3.8 percent in March 2020 to 15.8 percent in April 2020 due to the impacts of COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate was 2.6 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

### **Community Contacts**

As part of this evaluation, the OCC reviewed information from a representative of a local CD organization to better understand area credit and community needs. The representative stated that start-up business funds were a need. The contact also noted that limited land availability has an impact on the housing market in the Lexington area. In general, the contact expressed the willingness of local banks to both lend and donate to community projects.

### **Scope of Evaluation in Kentucky**

The Lexington CSA received a full-scope review. This area accounted for 79 percent of deposits and 74 percent of the lending in the state during the evaluation period. The remaining AAs received a limited-scope review. FTB did not originate or purchase enough small loans to farms in the Owensboro MSA in the state of Kentucky to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY**

### **LENDING TEST**

The bank's performance under the Lending Test in the State of Kentucky is rated Outstanding.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Lexington CSA was excellent. Performance in the limited-scope areas supported the overall Lending Test rating

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Lexington CSA	4,056	1,222	38	51	5,367	74.4	78.9
Owensboro MSA	411	75	1	6	493	6.8	3.4
KY Non-MSA	1,005	264	69	20	1,358	18.7	17.7
Total	5,472	1,561	108	77	7,218	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<b>Dollar Volume of Loans* (\$000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Lexington CSA	692,721	116,427	3,686	57,178	870,012	83.7	78.9
Owensboro MSA	41,669	4,726	1	3,833	50,229	4.8	3.4
KY Non-MSA	97,874	9,563	8,194	4,167	119,798	11.5	17.7
Total	832,264	130,716	11,881	65,178	1,040,039	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 9.9 percent and ranked third among 41 FDIC-insured banks, which placed it in the top 8 percent of banks.

The bank had a market share of 3.4 percent based on the number of home mortgage loans originated or purchased and ranked sixth among 443 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 16.3 percent were Rocket Mortgage (6 percent), Central Bank & Trust Company (5.3 percent), and University of Kentucky Federal Credit Union (5 percent).

The bank had a market share of 3.5 percent based on the number of small loans to businesses originated or purchased. The bank ranked 10<sup>th</sup> out of 126 small business lenders, which placed it in the top 8 percent of lenders. The top three lenders with a combined market share of 37.7 percent were Central Bank & Trust Company (13.6 percent), American Express National Bank (13.5 percent), and JPMorgan Chase Bank, N.A. (10.7 percent).

The bank had a market share of 0.3 percent based on the number of small loans to farms originated or purchased. The bank ranked 16<sup>th</sup> out of 25 small farm lenders, which placed it in the top 64 percent of lenders. The top three lenders with a combined market share of 48.6 percent were JPMorgan Chase Bank, N.A. (18.9 percent), Whitaker Bank (16.6 percent), and John Deere Financial, F.S.B. (13.1 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in both low- and moderate-income geographies was near the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentage of small loans to businesses in low-income geographies was near the percentage of businesses in low-income geographies but was below the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank made no small loans to farms in low-income geographies. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but exceeded the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 9.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank collected or considered the gross annual revenues in the underwriting of all small loans to farms in this AA. The bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Kentucky.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 51 CD loans totaling nearly \$57.2 million, which represented 34.9 percent of allocated tier 1 capital. By dollar volume, 8.7 percent of these loans funded affordable housing, 2.4 percent funded economic development, 50 percent funded revitalization and stabilization efforts, and 38.9 percent funded community services targeted to low- and moderate-income individuals.



Examples of CD loans include:

- \$5 million PPP loan to a local business allowing it to meet critical needs and continue operations during the COVID-19 pandemic.
- \$5 million line of credit to the county transit authority that provides service to a majority of low- and moderate-income persons. The funding allowed the transit authority to continue operations uninterrupted and manage cash flows during delays in funding.
- \$500,000 line of credit to an organization that provides community services to low- and moderate-income persons by providing basic needs, advocating educational attainment, and improving financial stability. The funding allowed the organization to manage cash flow between the receipt of donations.

### **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 370 loans under flexible lending programs specific to the AA totaling \$56.5 million. Program volumes included 32 KHC loans totaling \$2.4 million, four 53 Community Mortgage loans totaling \$562,000, 139 FHA loans totaling \$21.8 million, 68 Freddie Mac HP loans totaling \$10.3 million, 37 Fannie Mae HR loans totaling \$5.5 million, one Fannie Mae RN loans totaling \$159,000, 30 USDA/RA loans totaling \$4.4 million, and 59 VA loans totaling \$11.5 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Owensboro MSA and KY Non-MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the limited-scope areas supported the overall Lending Test rating.

Refer to Tables O through T in the state of Kentucky in appendix D for the facts and data supporting these conclusions.

### **INVESTMENT TEST**

The institution's performance under the Investment Test in Kentucky is rated High Satisfactory.

Based on a full-scope review, FTB's performance in the Lexington MSA was excellent. Performance in the limited-scope areas lowered the overall Investment Test rating.

### **Number and Amount of Qualified Investments**

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Lexington MSA	15	5,269	143	14,110	158	74.9	19,379	96.2	10	\$618
Owensboro MSA	3	196	21	46	24	11.4	242	1.2	1	\$2
KY Non- MSA	3	483	26	40	29	13.7	523	2.6	3	\$68
Total	21	5,948	190	14,196	211	100.0	20,144	100.0	14	\$688

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

## Lexington MSA

The bank made 143 investments totaling \$14.1 million during the evaluation period to approximately 50 organizations/projects. The dollar volume of current and prior period investments represented 11.8 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 94.6 percent of investments supported affordable housing, 0.2 percent supported revitalization and stabilization efforts, 3.8 percent funded community services to low- and moderate-income individuals, and 1.4 percent supported economic development. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$7.6 million LIHTC project for 252 units of affordable housing in Lexington. Units are income restricted to households earning at or below 60 percent of the AMI. The project involved multiple sources of financing including the city's HOME fund and affordable housing fund.
- \$4.8 million investment that will assist in renovating 144 units of affordable housing in Lexington. All units are income restricted to households earning at or below 80 percent of the AMI. The project also received funds from the KHC and the city's Affordable Housing Trust Fund.
- \$736,000 investment for 134 units of LIHTC senior housing in Lexington. The project participates in the HUD Section 8 housing rental assistance program. Units are restricted to renters earning up to 30 percent of the AMI.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Investment Test in the Owensboro MSA and KY Non-MSA AAs was weaker than the bank's overall performance under the Investment Test in the full-scope area due to lower levels of investments. Performance in the limited-scope areas lowered the overall Investment Test rating.

## SERVICE TEST

The bank's performance under the Service Test in Kentucky is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

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

### Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Lexington CSA	78.9	14	63.6	14.3	21.4	21.4	28.6	0.0	6.4	20.9	37.5	35.2	0.0
Owensboro MSA	3.4	2	9.1	0.0	50.0	50.0	0.0	0.0	3.7	24.2	46.4	25.6	0.0
KY Non-MSA	17.7	6	27.3	0.0	0.0	66.7	33.3	0.0	0.0	3.2	56.7	40.0	0.0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low- and moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 27 ATMs in the AA, of which 18 were deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Lexington CSA	0	1	0	0	0	-1	0
Owensboro MSA	0	1	0	0	0	-1	0
KY Non-MSA	0	2	0	0	-2	0	0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed one branch, which was in an upper-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours for branches in low- and moderate-income geographies were the same as branches in middle- and upper income geographies.

## **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 113 qualified CD service activities to 42 organizations logging 1,730 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 78 of these activities with 14 employees providing 1,244 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

The following are examples of CD services provided in this AA:

- Two employees served on a committee for an economic development organization. The employees provided a total of 150 hours of service.
- Bank staff provided 17 financial education programs, which included one YBC for 120 students.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Owensboro MSA and KY Non-MSA was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope areas had minimal effect on the overall Service Test rating in the state of Kentucky.

## State of Michigan

**CRA rating for the State of Michigan<sup>10</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distribution of loans and the overall distribution of loans by borrower income and businesses of different sizes were good.
- FTB was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Michigan

FTB delineated seven AAs in Michigan. They include a portion of the Detroit-Warren-Ann Arbor (Detroit) CSA; Grand Rapids-Kentwood-Muskegon (Grand Rapids) CSA; Jackson MSA in its entirety; Kalamazoo-Battle Creek-Portage (Kalamazoo) CSA; Lansing MSA in its entirety; Saginaw-Midland-Bay City (Saginaw) CSA in its entirety; and 13 non-MSA (MI Non-MSA) counties. The Non-MSA counties were combined into one AA for analysis and presentation. The state rating does not include the counties in the South Bend CSA that were reviewed as part of the MMSA analysis. Refer to appendix A for a list of counties reviewed.

Michigan was FTB's fourth largest rating area based on total deposits. The bank had nearly \$21 billion in deposits in the state, which represented 12.4 percent of its deposits. The combined areas were served by 82 FDIC-insured banks operating 1,823 branches. FTB ranked sixth with 7.2 percent deposit market share. The top three banks and their market share were JPMorgan Chase Bank, N.A. (25.3 percent), Comerica Bank (13.4 percent), and The Huntington National Bank (12.8 percent). FTB had 168 branches and 274 ATMs. During the evaluation period, the bank made \$9.8 billion or 16.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Detroit CSA

The following table provides a summary of the demographics, including housing, business, and economic business information for the Detroit CSA AA.

---

<sup>10</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area

**Table A – Demographic Information of the Assessment Area****Assessment Area: Detroit CSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,547	13.6	24.0	33.0	27.1	2.1
Population by Geography	5,128,583	10.5	22.1	35.4	31.5	0.5
Housing Units by Geography	2,258,841	12.2	23.9	34.8	28.8	0.4
Owner-Occupied Units by Geography	1,365,522	6.1	18.5	38.6	36.6	0.1
Occupied Rental Units by Geography	626,645	19.4	30.9	31.0	17.9	0.8
Vacant Units by Geography	266,674	26.0	34.7	23.9	14.4	1.1
Businesses by Geography	422,939	8.0	19.4	32.8	38.8	0.9
Farms by Geography	10,035	4.7	14.9	45.8	34.4	0.3
Family Distribution by Income Level	1,284,089	22.8	16.5	19.1	41.6	0.0
Household Distribution by Income Level	1,992,167	25.1	15.6	16.9	42.4	0.0
Median Family Income MSA - 11460 Ann Arbor, MI MSA		\$87,331	Median Housing Value			\$130,852
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI		\$52,733	Median Gross Rent			\$863
Median Family Income MSA - 22420 Flint, MI MSA		\$53,333	Families Below Poverty Level			12.7%
Median Family Income MSA - 33780 Monroe, MI MSA		\$67,811				
Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI		\$76,739				
<i>Source: 2015 ACS and 2021 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$26,367 to \$38,370 and moderate-income families earned less than \$42,186 to \$61,391, depending on the MSA/MD. The median housing value in the AA is \$130,852. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$659 to \$959 for a low-income borrower and \$1,055 to \$1,535 for a moderate-income borrower, depending on the MSA/MD. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$695. Based on these calculations, low-income borrowers in the Detroit CSA would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 12.7 percent of families were living below the poverty level.

## Economic Data

According to Moody's Analytics, manufacturing, healthcare, and logistics are important economic drivers of the Detroit economy. Detroit remains a center of automobile industry headquarters, production, and research and development. Supply chain issues, especially with semiconductor chips, have had an outsized negative impact on this economy throughout 2021. This has resulted in idle plants impacting not only automobile manufacturers but upstream parts manufacturers. Pent-up demand for vehicles due to high prices will likely benefit the industry into the middle of the 2020s. Transportation and warehousing also provide a sound boost to the Detroit economy with significant goods passing over bridges into the Canadian province of Ontario. Weaknesses for Detroit's economy include a high crime rate, eroding infrastructure, municipal fiscal challenges, and deterioration of city schools, partially because of municipal fiscal challenges. Migration out of Detroit continues to negatively impact the city. Top employers in Detroit include General Motors, the Ford Motor Company, Chrysler Group LLC, Beaumont Health System, and the Henry Ford Health System.

The unemployment rate for the Detroit CSA was 5.5 percent as of January 2017. Unemployment levels significantly increased from 5 percent in March 2020 to 24 percent in May 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the Detroit CSA was 4.2 percent as of December 2021. The national rate was 3.7 percent as of December 2021.

## Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts within the Detroit CSA to better understand area credit and community needs. Contacts worked for a variety of organizations focused on affordable housing and community development. Another contact worked in local city government. Contacts expressed a wide range of needs for the CSA, but each contact described needs associated with housing. Loans and/or grants for home repairs and rehabilitation were consistently mentioned. Housing stock is aging, especially in the city of Detroit. Many older row homes and apartment units date back to the 1950s and 1960s. Contacts also described the need for reliable and affordable public transportation, emergency utility assistance grants as the cost of energy rises, and improvements in local schools. The greatest needs include:

- Affordable housing.
- Rehabilitation loans and grants for rehabilitation of aging housing stock.
- Grants to support reliable public transportation throughout the Detroit-metro area for low- and moderate-income individuals and families.
- Emergency utility assistance grants to help offset higher energy costs for nonprofits and low- and moderate-income families.
- Investments in local Detroit public schools.

## Scope of Evaluation in Michigan

The Detroit CSA received a full-scope review. This area accounted for 41.9 percent of deposits and 37.4 percent of lending in the state during the evaluation period. The remaining AAs received a limited-scope review. The state of Michigan received substantial weight in determining the overall rating of the bank. FTB did not originate or purchase enough small loans to farms in the Jackson MSA, Kalamazoo CSA, Lansing MSA, or Saginaw CSA in the state of Michigan to conduct a meaningful analysis.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

### LENDING TEST

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

#### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit CSA AA was excellent. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

#### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Detroit CSA	16,559	9,370	25	221	26,175	37.1	41.9
Grand Rapids CSA	19,987	5,926	32	147	26,092	37.0	35.2
Jackson MSA	555	234	5	8	802	1.1	0.5
Kalamazoo CSA	3,523	1,080	4	23	4,630	6.6	5.5
Lansing MSA	3,843	1,299	15	39	5,196	7.4	6.4
Saginaw CSA	653	377	0	11	1,041	1.5	0.8
MI Non-MSA	4,754	1,801	36	41	6,632	9.4	9.6
Total	49,874	20,087	117	490	70,568	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<b>Dollar Volume of Loans* (\$000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Detroit CSA	2,626,942	1,248,408	461	603,164	4,478,975	40.2	41.9
Grand Rapids CSA	2,787,714	738,912	1,060	273,278	3,800,964	34.1	35.2
Jackson MSA	62,889	37,092	73	123,678	223,732	2.0	0.5
Kalamazoo CSA	494,771	142,720	105	67,111	704,707	6.3	5.5
Lansing MSA	461,292	150,046	191	118,561	730,090	6.6	6.4
Saginaw CSA	73,820	55,834	0	131,798	261,452	2.3	0.8
MI Non-MSA	703,300	211,326	3,508	27,107	945,241	8.5	9.6
Total	7,210,728	2,584,338	5,398	1,344,697	11,145,161	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 4 percent and ranked seventh among 47 FDIC-insured banks, which placed it in the top 15 percent of banks.

The bank had a market share of 1.8 percent based on the number of home mortgage loans originated or purchased and ranked 10<sup>th</sup> among 735 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 29 percent were Rocket Mortgage (15.3 percent), United Wholesale Mortgage (10 percent), and JPMorgan Chase Bank, N.A. (3.7 percent).



The bank had a market share of 2.9 percent based on the number of small loans to businesses originated or purchased and ranked 12<sup>th</sup> out of 264 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 37.3 percent were JPMorgan Chase Bank, N.A. (15.2 percent), American Express National Bank (14.1 percent), and Bank of America, N.A. (8 percent).

The bank had a market share of 0.8 percent (2019 data) based on the number of small loans to farms originated or purchased and ranked 15<sup>th</sup> out of 22 small farm lenders, which placed it in the top 69 percent of lenders. The top three lenders with a combined market share of 57.5 percent were JPMorgan Chase Bank, N.A. (32.6 percent), John Deere Financial, F.S.B. (13.4 percent), and U.S. Bank, N.A. (11.5 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in low-income geographies but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

#### ***Small Loans to Businesses***

Refer to Table Q in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses by all lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentage of small loans to farms in low-income geographies was near the percentage of farms in low-income geographies and exceeded the aggregate distribution of small loans to farms by all lenders. The percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 11.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 4 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of \$1 million or less was near the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distributions of small loans to farms by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Michigan.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 221 CD loans totaling nearly \$603.2 million, which represented 69.3 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 3.2 percent of these loans funded affordable housing, 36.3 percent funded economic development, 33.1 percent funded revitalization and stabilization efforts, and 27.4 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$16.4 million loan for the construction of a 160-bed skilled nursing facility that will redevelop an existing brownfield. The project is the first new skilled nursing facility built in the city in over 30 years. The project is expected to create 139 new jobs.
- \$3 million loan to a CDFI that provides direct capital, loans, and technical assistance to small business owners in the Detroit area.
- \$1.9 million loan for the construction of a 43-unit apartment complex to help address chronic homelessness in Detroit and provide permanent housing. The facility also provides on-site health care, substance abuse treatment, and job-readiness training to the residents and surrounding community. The project received multiple sources of funding including the city of Detroit and the MSHDA, and federal HOME funds.

### **Product Innovation and Flexibility**

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 792 loans under flexible lending programs specific to the AA totaling \$101.1 million. Program volumes included 170 MSHDA loans totaling \$8.2 million, one 53 Community Mortgage loan totaling

\$68,000, 369 FHA loans totaling \$51.8 million, 90 Freddie Mac HP loans totaling \$12.4 million, one Fannie Mae HR loan totaling \$263,000, 41 Fannie Mae RN loans totaling \$5.9 million, 11 USDA/RA loans totaling \$1.4 million, and 109 VA loans totaling \$21.1 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Grand Rapids CSA, Jackson MSA, Kalamazoo CSA, Lansing MSA, and MI Non-MSA AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the Saginaw CSA was weaker than the bank's overall performance under the Lending Test in the full-scope area due to weaker geographic and/or borrower distribution of loans. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

Refer to Tables O through T in the state of Michigan in appendix D for the facts and data supporting these conclusions.

## INVESTMENT TEST

The institution's performance under the Investment Test in Michigan is rated Outstanding.

Based on a full-scope review, the institution's performance in the Detroit CSA AA was excellent. Performance in the limited-scope areas had a minimal effect on the Investment Test rating for the state of Michigan.

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Detroit CSA	79	\$33,242	503	\$101,953	582	39.7	\$135,195	44.6	60	\$1,784
Grand Rapids CSA	45	\$23,913	391	\$55,464	436	29.7	\$79,377	26.2	40	4,648
Jackson MSA	3	\$122	16	\$297	19	1.3	\$419	0.1	3	14
Kalamazoo CSA	16	\$4,325	87	\$17,693	103	7.0	\$22,018	7.3	13	256
Lansing MSA	19	\$5,253	87	\$31,323	106	7.2	\$36,576	12.1	11	538
Saginaw CSA	7	\$641	53	\$2,356	60	4.1	\$2,997	1.0	5	46
MI Non-MSA	35	\$9,693	125	\$16,893	160	10.9	\$26,586	8.8	23	597
<b>Total</b>	<b>204</b>	<b>77,189</b>	<b>1,262</b>	<b>225,979</b>	<b>1,466</b>	<b>100.0</b>	<b>303,168</b>	<b>1000</b>	<b>155</b>	<b>7,883</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

The bank made 503 investments totaling \$101.9 million during the evaluation period to over 200 organizations/projects. The dollar volume of current and prior period investments represented 15.5 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 92 percent of investments supported affordable housing, 4.2 percent supported economic development, 3.4 percent funded community services to low- and moderate-income individuals, and 0.4 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$15.6 million investment for the construction of a 77-unit LIHTC apartment complex for seniors. The redevelopment of the former Montgomery Ward property is part of the East Dearborn Downtown Development Authority Plan and Dearborn's Master Plan.
- \$10.2 million investment for the construction of a 54-unit affordable housing unit building for low- and moderate-income seniors in Livonia. Income is restricted to persons earning between 30 and 60 percent of the AMI. Financing of the project was also provided by the MSHDA and Michigan Economic Development Corporation.
- \$3 million investment in a non-profit CDFI fund to help revitalize economically distressed neighborhoods in Detroit. The fund provides loans and technical assistance to small business owners, developers, building owners, contractors, and subcontractors who are unable to receive capital from traditional financing sources.

### **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Investment Test in the Grand Rapids CSA, Kalamazoo CSA, Lansing MSA, Saginaw CSA, and MI Non-MSA AAs was consistent with the bank's overall performance under the Investment Test in the full-scope area. The bank's performance in the Jackson MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope area due to a lower volume of investments. Performance in the limited-scope areas had a minimal effect on the Investment Test rating for the state of Michigan.

### **SERVICE TEST**

The bank's performance under the Service Test in Michigan is rated Outstanding.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Detroit CSA was excellent.

## Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Detroit CSA	41.9	77	45.8	11.7	16.9	39.0	32.5	0.0	10.5	22.1	35.4	31.5	0.5
Grand Rapids CSA	35.2	50	29.8	4.0	18.0	44.0	34.0	0.0	5.2	18.7	49.9	26.1	0.2
Jackson MSA	0.01	1	0.6	0.0	100.0	0.0	0.0	0.0	9.9	19.4	47.4	20.1	3.2
Kalamazoo CSA	5.5	10	6.0	0.0	30.0	40.0	30.0	0.0	8.1	19.2	46.7	24.7	1.2
Lansing MSA	6.4	12	7.1	8.3	25.0	50.0	16.7	0.0	5.4	19.4	44.5	27.1	3.6
Saginaw CSA	0.8	3	1.8	0.0	66.7	66.7	33.3	0.0	6.7	16.6	48.2	28.5	0.0
MI Non-MSA	9.6	15	8.9	0.0	6.7	60.0	33.3	0.0	1.5	8.1	69.0	21.4	0.0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was below the percentage of the population living within those geographies. Examiners gave positive consideration for 10 branches in middle- and upper income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 101 ATMs in the AA, of which 98 were deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Detroit CSA	3	13	0	-3	-4	-3	0
Grand Rapids CSA	1	5	0	-1	-4	1	0
Jackson MSA	0	1	0	0	-1	0	0
Kalamazoo CSA	0	3	0	-1	-1	-1	0
Lansing MSA	0	2	0	0	0	-2	0
Saginaw CSA	0	1	0	0	-1	0	0
MI Non-MSA	0	6	0	-1	-3	-2	0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. In the Detroit CSA, the bank opened three branches, one in a moderate-income geography, and closed 13 branches, four of which were in moderate-income geographies. Branch closures resulted from lower market activity and demand with several branches consolidated into nearby locations.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AAs, particularly low- and moderate-income geographies and/or individuals. Average hours at branches in low- and moderate-income geographies consistent with branches in middle- and upper income geographies.

### **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 546 qualified CD service activities to over 200 organizations logging 21,412 qualified hours within the AA during the evaluation period. Leadership is evident through board or committee participation in 181 of these activities with 181 employees providing 6,400 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

The following are examples of CD services provided in this AA:

- An employee of the bank served on the board of a federally qualified health center serving Oakland County. The employee provided 600 hours of service.
- Bank employees conducted nearly 190 financial education sessions, which included 46 YBC sessions to nearly 1,700 students.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Grand Rapids CSA and Lansing MSA AAs was consistent with the bank's overall performance under the Service Test in the full-scope area. Performance under the Service Test in the Jackson MSA, Kalamazoo CSA, Saginaw CSA, and MI Non-MSA AAs was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope areas had a minimal effect on the overall Service Test rating in the state of Michigan.

## State of North Carolina

**CRA rating for the State of North Carolina:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distribution of loans and the overall distribution of loans by borrower income and businesses of different sizes were excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in North Carolina

FTB delineated five AAs in North Carolina. They include a portion of the Asheville-Marion-Brevard (Asheville) CSA; Charlotte-Concord (Charlotte) CSA; Hickory-Lenoir-Morganton (Hickory) MSA in its entirety; Raleigh-Durham-Cary (Raleigh) CSA; and four Non-MSA (NC Non-MSA) counties. The Non-MSA counties were combined into one AA for analysis and presentation. Refer to appendix A for a list of counties reviewed.

North Carolina was FTB's seventh largest rating area based on total deposits. The bank had nearly \$7.1 billion in deposits in the state, which represented 4.2 percent of the bank's total deposits. The combined areas were served by 63 FDIC-insured banks operating 851 branches. FTB ranked fifth with 2 percent deposit market share. The top three banks and their market share were Bank of America, N.A. (55.3 percent), Truist Bank (16.7 percent), and Wells Fargo Bank, N.A. (15 percent). FTB had 74 branches and 97 ATMs. During the evaluation period, the bank made nearly \$2.9 billion or 5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Charlotte CSA

The following table provides a summary of the demographics, including housing, business, and economic business information for the Charlotte CSA AA.



**Table A – Demographic Information of the Assessment Area****Assessment Area: Charlotte CSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	425	8.2	23.1	32.9	34.8	0.9
Population by Geography	1,872,268	6.9	22.1	34.8	36.0	0.3
Housing Units by Geography	769,641	7.0	22.5	35.1	35.2	0.1
Owner-Occupied Units by Geography	450,379	2.8	17.8	37.9	41.5	0.0
Occupied Rental Units by Geography	247,325	13.9	29.8	30.0	26.2	0.2
Vacant Units by Geography	71,937	9.9	27.3	35.4	27.2	0.2
Businesses by Geography	223,743	6.4	17.5	29.2	46.3	0.7
Farms by Geography	5,085	3.9	16.3	46.1	33.5	0.2
Family Distribution by Income Level	467,538	21.6	16.5	18.7	43.2	0.0
Household Distribution by Income Level	697,704	22.5	15.9	17.5	44.2	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$64,187	Median Housing Value			\$191,246
Median Family Income Non-MSAs – NC		\$47,217	Median Gross Rent			\$902
			Families Below Poverty Level			11.1%

Source: 2015 ACS and 2021 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.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$32,094 and moderate-income families earned less than \$51,350. The median housing value in the AA is \$191,246. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$802 for a low-income borrower and \$1,284 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,031. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 11.1 percent of families were living below the poverty level.

### **Economic Data**

According to Moody's Analytics, the economy remains strong and is driven by construction, logistics, office-using industries, and finance and insurance jobs. Single-family housing is overvalued, and housing growth is accelerating. Professional and business services, government, retail trade, and education and health services are

economic drivers of the economy. The largest employers are Atrium Health, Wells Fargo & Co., Walmart, Bank of America Corp., and Novant Health Inc.

The unemployment rate for the Charlotte CSA was 4.9 percent as of January 2017. Unemployment levels increased significantly from 3.7 percent in March 2020 to 13.9 percent in May 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the CSA was 3.2 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

This evaluation considers comments provided by two local organizations that serve the Charlotte CSA. The organizations included one affordable housing organization and one community development organization that helps to address the causes and conditions of poverty.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable for-sale and rental housing.
- Small businesses economic development.
- Closing cost assistance.
- Financial literacy/education.
- Home ownership and credit counseling.

Opportunities for participation by financial institutions include the following:

- Lending, investment, and service in affordable housing.
- Lending and investment in economic development and workforce development.
- Funding and supporting CD services such as financial literacy.

## **Scope of Evaluation in North Carolina**

The Charlotte CSA received a full-scope review. This AA accounted for 82.3 percent of the deposits and 76.7 percent of the lending in the state during the evaluation period. The remaining AAs received limited-scope reviews. FTB originated or purchased enough small loans to farms to conduct a meaningful analysis only in the Charlotte CSA in the state of North Carolina.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA**

### **LENDING TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Charlotte CSA AA is excellent. Performance in the limited-scope areas had a minimal effect on the overall Lending Test rating.

## Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Charlotte CSA	8,648	4,698	36	44	13,426	76.7	82.3
Asheville CSA	600	246	2	7	855	4.9	2.4
Hickory MSA	258	78	0	0	336	1.9	0.9
Raleigh CSA	1,614	716	1	15	2,346	13.4	12.0
NC Non-MSA	351	176	7	0	534	3.1	2.4
Total	11,471	5,914	46	66	17,497	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<b>Dollar Volume of Loans* (\$000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Charlotte CSA	1,685,523	392,292	2,707	245,394	2,325,916	72.5	82.3
Asheville CSA	104,449	19,694	26	13,517	137,686	4.3	2.4
Hickory MSA	47,753	5,020	0	0	52,773	1.6	0.9
Raleigh CSA	488,856	81,169	311	68,978	639,314	19.9	12.0
NC Non-MSA	47,268	6,135	213	0	53,616	1.7	2.4
Total	2,373,848	504,310	3,257	32,889	3,209,305	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank had deposit market share of 1.9 percent and ranked fourth among 39 FDIC-insured banks, which placed it in the top 11 percent of banks.

The bank had a market share of 1.5 percent based on the number of home mortgage loans originated or purchased and ranked 19<sup>th</sup> among 833 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 18.9 percent were Rocket Mortgage (8.9 percent), Wells Fargo Bank, N.A. (5.4 percent), and Movement Mortgage, LLC (4.6 percent).

The bank had a market share of 3 percent based on the number of small loans to businesses originated or purchased and ranked 12<sup>th</sup> out of 244 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 36.7 percent were Bank of America, N.A. (13.4 percent), American Express National Bank (12.3 percent), and Wells Fargo Bank, N.A. (11 percent).

The bank had a market share of 1.3 percent based on the number of small loans to farms originated or purchased and ranked 16<sup>th</sup> out of 26 small farm lenders, which placed it in the top 62 percent of lenders. The top three lenders with a combined market share of 56.1 percent were John Deere Financial, F.S.B. (25.2 percent), Wells Fargo Bank, N.A. (22.2 percent), and Truist Bank (8.7 percent).

## Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies was near the percentage of owner-occupied homes in low-income geographies and approximated the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Charlotte CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the state of Charlotte CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms is poor.

The bank made no small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was below both the percentage of farms in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of Charlotte CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table R in the state of Charlotte CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 12.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the state of Charlotte CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 13.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of \$1 million or less was near the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in North Carolina.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 44 CD loans totaling nearly \$245.4 million, which represented 42.7 percent of allocated tier 1 capital. By dollar volume, 44.1 percent of these loans funded affordable housing, 40.1 percent funded economic development, 5.6 percent funded revitalization and stabilization efforts, and 10.2 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$31.8 million loan to develop 202 units of affordable housing in Charlotte. Units are restricted to families earning between 30 and 80 percent of the AMI.
- \$17.5 million construction bridge loan to a non-profit organization for the development of a 144-unit LIHTC housing complex. The organization works to provide safe and affordable housing in Charlotte for low- and moderate-income persons.
- \$5 million loan to a private historically black university that is attended primarily by low- and moderate-income students. Funding helped the university with its growth plans to reach more students within Charlotte's underserved community corridors.

### **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 382 loans under flexible lending programs specific to the AA totaling \$65.4 million. Program volumes included one 53 Community Mortgage loan totaling \$102,000, 190 FHA loans totaling \$30.1 million, 65 Freddie Mac HP loans totaling \$11.1 million, 29 Fannie Mae HR loans totaling \$4 million, 21 USDA/RA loans totaling \$5.4 million, and 63 VA loans totaling \$14.6 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Asheville CSA, Hickory MSA, Raleigh CSA, and NC Non-MSA AAs was weaker than the bank's overall performance under the Lending Test in the full-scope area. Weaker performance was due to weaker geographic and/or borrower distributions. Performance in the limited-scope areas had a minimal effect on the overall Lending Test rating.

Refer to Tables O through T in the state of North Carolina section of appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

The institution's performance under the Investment Test in North Carolina is rated Outstanding.

Based on a full-scope review, the FTB's performance in the Charlotte CSA AA is excellent. Performance in the limited-scope areas had minimal effect on the overall Investment Test rating.

### **Number and Amount of Qualified Investments**

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Charlotte CSA	8	14,395	245	44,756	253	67.1	\$59,151	53.5	5	2,712
Asheville CSA	3	227	15	66	18	4.8	293	0.3	0	\$0
Hickory MSA	1	2,418	6	42	7	1.9	2,460	2.2	1	122
Raleigh CSA	4	2,486	92	46,071	96	25.5	48,557	43.9	2	108
NC Non-MSA	1	102	2	11	3	0.8	113	0.1	1	15
<b>Total</b>	<b>17</b>	<b>19,628</b>	<b>360</b>	<b>90,946</b>	<b>377</b>	<b>100</b>	<b>110,574</b>	<b>100</b>	<b>9</b>	<b>2,957</b>

\*The table present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

The bank made 245 investments totaling \$44.8 million during the evaluation period to approximately 118 organizations/projects. The dollar volume of current and prior period investments represented 10.3 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 96.3 percent of investments supported affordable housing, 2.7 percent funded community services to low- and moderate-income individuals, 0.9 percent funded economic development, and 0.1 percent supported revitalization and stabilization efforts. The institution occasionally used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$7.8 million investment in a LIHTC fund for the development of a 72-unit rental housing complex in Charlotte. Units are income restricted to persons earning up to 60 percent of the AMI.
- \$8.4 million investment in a LIHTC fund for the development of an 80-unit affordable rental housing complex in Concord. Units are income restricted to persons earning up to 60 percent of the AMI.
- \$3 million investment for an 82-unit senior rental housing complex. The property is subject to HUD's Section 8 rental assistance program.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Hickory MSA and Raleigh CSA AAs was consistent with the bank's overall performance under the Investment Test in the full-scope area. The bank's performance in the Asheville CSA and NC Non-MSA was weaker than the bank's overall performance under the Investment Test due to lower levels of investments. Performance in the limited-scope areas had minimal effect on the overall Investment Test rating.

## SERVICE TEST

The bank's performance under the Service Test in North Carolina is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Charlotte CSA was excellent. Performance in the limited-scope areas had minimal effect on the overall Service Test rating in the state of North Carolina.

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Charlotte CSA	82.3	49	66.2	6.1	20.4	22.4	51.0	0.0	6.9	22.1	34.8	36.0	0.3
Ashville CSA	2.4	3	100.0	0.0	0.0	100.0	0.0	0.0	1.0	9.8	70.1	19.1	0.0
Hickory MSA	0.9	1	1.4	0.0	0.0	100.0	0.0	0.0	0.0	12.9	62.0	25.0	0.0
Raleigh CSA	12.0	17	23.0	11.8	11.8	35.3	41.2	0.0	7.0	22.0	31.6	38.6	0.8
NC Non-MSA	2.4	4	5.4	0.0	25.0	75.0	0.0	0.0	0.0	20.3	73.0	6.8	0.0

\*The table present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

## Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low- and moderate-income geographies was near the percentage of the population living within those geographies. Examiners gave positive consideration for three branches in middle- and upper income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 66 ATMs in the AA, of which 63 were deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Charlotte CSA	17	10	1	1	-1	6	0
Ashville CSA	0	0	0	0	0	0	0
Hickory MSA	0	0	0	0	0	0	0
Raleigh CSA	13	1	2	1	4	5	0
NC Non-MSA	0	1	0	0	-1	0	0

\* The table present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Within the Charlotte CSA, the bank opened 17 branches during the evaluation period: one each in a low- and moderate-income geography. The bank closed 10 branches, all in middle- and upper income geographies. Branch closures resulted from lower market activity and demand with several branches consolidated into nearby locations.



Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours in low- and moderate-income geographies were comparable to branches in middle- and upper income geographies.

### **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 329 qualified CD service activities to over 150 organizations logging 6,051 qualified hours within the AA during the evaluation period. Leadership is evident through board or committee participation in 121 of these activities with 38 employees providing 1,946 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service, economic development, and affordable housing needs.

The following are examples of CD services provided in this AA:

- An employee of the bank serves on the board of an organization that provides financial and non-financial assistance to residents in need. The employee provided 321 hours of service.
- Bank staff provided 111 financial education programs, which included 16 YBC sessions to over 350 students.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the NC Non-MSA AA was consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance in the Asheville CSA, Hickory MSA, and Raleigh CSA AAs was weaker than the bank's overall performance under the Service Test due to weaker branch distributions. Performance in the limited-scope areas had minimal effect on the overall Service Test rating in the state of North Carolina.

## State of Ohio

**CRA rating for the State of Ohio<sup>11</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was good, and the overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Ohio

FTB delineated six AAs in Ohio. They include a portion of the Cleveland-Akron-Canton (Cleveland) CSA; Columbus-Marion-Zanesville (Columbus) CSA; Dayton-Springfield-Kettering (Dayton) CSA; Lima CSA; Toledo-Findlay-Tiffin (Toledo) CSA; and eight Non-MSA (OH Non-MSA) counties. The state rating does not include the Cincinnati CSA reviewed as part of the MMSA analysis. Refer to appendix A for a complete list of the counties reviewed.

Ohio was FTB's third largest rating area based on total deposits. FTB had \$25.8 billion in deposits in the combined areas, which represented 15.3 percent of the bank's total deposits. The bank ranked fifth in deposit market share with 9.1 percent. There were 137 banks operating within these AAs operating 2,019 branch offices. The top three competitors and their market share included The Huntington National Bank (22.2 percent), JPMorgan Chase Bank, N.A. (14.3 percent), and KeyBank, NA (13.3 percent). FTB had 195 office locations and 372 ATMs within the combined areas. During the evaluation period, the bank made \$10.5 billion or 17.8 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Columbus CSA

The following table provides a summary of the demographics, including housing, business, and economic business information for the Columbus CSA AA.

---

<sup>11</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area

**Table A – Demographic Information of the Assessment Area****Assessment Area: Columbus CSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	455	14.9	24.2	32.3	27.5	1.1
Population by Geography	2,046,514	9.8	21.8	34.9	32.4	1.1
Housing Units by Geography	871,199	11.3	23.1	34.9	30.5	0.2
Owner-Occupied Units by Geography	483,713	4.9	18.1	37.6	39.4	0.0
Occupied Rental Units by Geography	303,010	17.5	30.0	31.8	20.3	0.4
Vacant Units by Geography	84,476	25.6	27.2	30.2	16.5	0.5
Businesses by Geography	154,836	9.1	18.2	30.2	41.9	0.5
Farms by Geography	4,854	4.5	15.2	43.4	36.8	0.1
Family Distribution by Income Level	499,782	22.0	16.9	19.5	41.6	0.0
Household Distribution by Income Level	786,723	24.0	16.3	17.2	42.5	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$156,829
Median Family Income Non-MSAs - OH		\$55,785	Median Gross Rent			\$833
			Families Below Poverty Level			10.9%

Source: 2015 ACS and 2021 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.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$35,227 and moderate-income families earned less than \$56,363. The median housing value in the AA is \$156,829. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$881 for a low-income borrower and \$1,409 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$862. Based on these calculations, some low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 10.9 percent of families were living below the poverty level.

### **Economic Data**

According to Moody's Analytics, education, financial services, healthcare, manufacturing, and state government activity are the important economic drivers. Columbus is home to The Ohio State University, which contributes to the highly educated workforce in the metro area. Enrollment in local universities has increased, which should also support hiring and growth throughout the metro area. The area has favorable migration patterns, low living costs, and lower business costs than other similarly sized cities. Housing starts are

well below its peak pace, which may cause affordability issues in the city. The largest employers are The Ohio State University, OhioHealth, JP Morgan Chase & Company, Nationwide, Nationwide Children's Hospital Inc., and Kroger.

The unemployment rate for the Columbus CSA was 5 percent as of January 2017. Unemployment levels significantly increased from 4.7 percent in March 2020 to 13.2 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate was 2.8 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

As part of the CRA evaluation, the OCC held a listening session with multiple community groups and reviewed two contacts within the AA to better understand area credit and community needs. Participants in the listening session included representatives from local government, affordable housing organizations, and community development corporations. Listening session participants and contacts described numerous needs including affordable housing, small business loans including micro-loans, small dollar loans for individuals, rehabilitation of older housing stock, workforce development programs, financial literacy and coaching associated with personal financial management, and financial education courses. Participants also highlighted the importance of digital literacy in the workforce and the need for financial institutions to offer services in various languages for non-native English speakers. Participants expressed a keen interest in having banks become more involved in CD services that impact individuals in the community. The greatest needs include:

- Affordable housing.
- Investments in LIHTC.
- Small business loans, including micro-loans to smaller businesses.
- Small dollar loans for individual homeowners for rehabilitation of their older houses.
- Workforce development programs that are paired with workforce housing.
- Financial literacy and coaching classes focused on basic and entry-level personal financial management skills.
- Financial education classes to include children and teenagers.

## **Scope of Evaluation in Ohio**

The Columbus CSA received a full-scope review. This area accounted for 27.2 percent of the deposits and 29.6 percent of the lending in the state during the evaluation period. The remaining AAs received limited-scope reviews. The state of Ohio received substantial weight in the overall bank CRA rating based on the level of deposits and lending during the evaluation period. FTB did not originate or purchase enough small loans to farms in the Cleveland CSA or Lima CSA in the state of Ohio to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO**

### **LENDING TEST**

The bank's performance under the Lending Test in the state of Ohio is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Columbus CSA AA is excellent. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Columbus CSA	16,781	5,091	55	88	22,015	27.3	29.6
Cleveland CSA	23,823	7,146	17	128	31,114	38.6	28.1
Dayton CSA	8,935	3,030	61	75	12,101	15.0	22.1
Toledo CSA	9,541	2,841	38	85	12,505	15.5	17.4
OH Non-MSA	1,777	334	63	5	2,179	2.7	1.9
Lima CSA	892	146	16	6	1,060	1.3	0.9
<b>Total</b>	<b>61,749</b>	<b>18,588</b>	<b>250</b>	<b>387</b>	<b>80,974</b>	<b>100.0</b>	<b>100.0</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<b>Dollar Volume of Loans* (\$000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Columbus CSA	2,928,187	452,045	2,785	199,546	3,582,563	29.6	29.6
Cleveland CSA	3,356,734	762,392	381	682,699	4,802,206	39.7	28.1
Dayton CSA	928,632	376,494	1,525	423,714	1,730,365	14.3	22.1
Toledo CSA	1,140,467	309,060	1,525	220,424	1,671,476	13.8	17.4
OH Non-MSA	169,935	24,886	1,596	6,733	203,150	1.7	1.9
Lima CSA	76,788	9,049	318	13,427	99,582	0.8	0.9
<b>Total</b>	<b>8,600,743</b>	<b>1,933,926</b>	<b>8,130</b>	<b>1,546,543</b>	<b>12,089,342</b>	<b>100.0</b>	<b>100.0</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 7.6 percent and ranked fourth among 59 FDIC-insured banks, which placed it in the top 7 percent of banks.

The bank had a market share of 4 percent based on the number of home mortgage loans originated or purchased and ranked fifth among 633 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders with a combined market share of 17.9 percent were The Huntington National Bank (8 percent), Rocket Mortgage (5 percent), and Union Savings Bank (4.9 percent).

The bank had a market share of 4.9 percent based on the number of small loans to businesses originated or purchased and ranked sixth out of 215 small business lenders, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 41.2 percent were JPMorgan Chase Bank, N.A. (16.7 percent), The Huntington National Bank (13.7 percent), and American Express National Bank (10.8 percent).

The bank had a market share of 4.9 percent based on the number of small loans to farms originated or purchased and ranked sixth out of 215 small farm lenders, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 60.5 percent were The Huntington National Bank (30.4 percent), John Deere Financial, F.S.B. (18.4 percent), and JPMorgan Chase Bank, N.A. (11.7 percent).

## **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was near both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies and was near the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was near the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank made no small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

#### ***Home Mortgage Loans***

Refer to Table P in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

#### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 16.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

#### ***Small Loans to Farms***

Refer to Table T in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 16.4 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small

loans to farms with revenues of \$1 million or less was near the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Ohio.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 88 CD loans totaling nearly \$199.5 million, which represented 26.4 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 18.7 percent of these loans funded affordable housing, 35 percent funded economic development, 34.6 percent funded revitalization and stabilization efforts, and 11.7 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$9.5 million PPP loan to a heavy equipment manufacturer located in a low-income geography in Columbus. The loan allowed the company to meet critical needs during the COVID-19 pandemic.
- \$4.4 million loan for the construction of a 62-unit apartment complex in Columbus. Units are income restricted to individuals earning between 30 to 80 percent of the AMI.
- \$3.9 million PPP loan to a physician group located in a moderate-income geography in Columbus. The loan allowed the office to meet critical needs and continue to operate during the COVID-19 pandemic.

## **Product Innovation and Flexibility**

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs. FTB originated or purchased 1,000 loans under flexible lending programs specific to the AA totaling \$157.8 million. Program volumes included nine 53 Community Mortgage loans totaling \$825,000, 378 FHA loans totaling \$60 million, 275 Freddie Mac HP loans totaling \$38.4 million, 67 Fannie Mae HR loans totaling \$9.4 million, two Fannie Mae RN loans totaling \$484,000, 32 USDA/RA loans totaling \$4 million, and 237 VA loans totaling \$44.6 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Cleveland CSA, Dayton CSA, Lima CSA, and OH Non-MSA AAs was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance under the Lending Test in the Toledo CSA AA was weaker than the bank's overall performance under the Lending Test in the full-scope area due to weaker geographic and borrower distributions. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.



Refer to Tables O through T in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The institution's performance under the Investment Test in Ohio is rated Outstanding.

Based on a full-scope review, the FTB's performance in Columbus was excellent. Performance in the limited-scope areas supported the overall Investment Test rating.

### Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Columbus CSA	74	24,970	397	60,638	471	32.5	85,608	29.9	40	4,654
Cleveland CSA	68	20,697	348	63,822	416	28.7	84,519	29.5	42	2,686
Dayton CSA	42	8,849	198	56,992	240	16.5	65,841	23.0	22	2,381
Lima CSA	3	367	18	6,752	21	1.4	7,119	2.5	2	60
OH Non-MSA	16	4,949	45	3,331	61	4.2	8,280	2.9	12	1,180
Toledo CSA	31	11,185	211	23,790	242	16.7	34,975	1212.2	21	2,391
Total	234	71,015	1,217	215,326	1,451	100.0	286,341	100.0	139	13,352

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

The bank made 397 investments totaling \$60.6 million during the evaluation period to over 175 organizations/projects. The dollar volume of current and prior period investments represented 11.3 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing and economic development. By dollar volume, 89.5 percent of investments supported affordable housing, 6.2 percent supported economic development, 3.6 percent funded community services to low- and moderate-income individuals, and 0.7 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$8.3 million investment for a 150-unit senior rental housing complex in Gahanna. Units are income restricted under the HUD Section 8 rental assistance program.
- \$7.5 million investment to a CDFI that works with the private, non-profit, and public sectors to create and preserve affordable housing opportunities in Columbus, OH and Franklin County.

- \$1.7 million investment in an affordable housing equity fund to renovate a building that will provide 91 units of housing for homeless individuals or for those at risk of homelessness.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance under the Investment Test in the Cleveland CSA, Dayton CSA, Lima CSA, Toledo CSA, and OH non-MSA AAs was consistent with the bank's overall performance in the full-scope area. Performance in the limited-scope areas supported the overall Investment Test rating.

## SERVICE TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Columbus CSA AA was excellent. Performance in the limited-scope areas lowered the Service Test rating in Ohio.

## Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Columbus CSA	29.6	53	27.2	7.5	20.8	37.7	34.0	0.0	9.8	21.8	34.9	32.4	1.1
Cleveland CSA	28.1	69	35.4	10.1	15.9	42.0	31.9	0.0	11.0	18.9	39.6	30.2	0.3
Dayton CSA	22.1	5	17.9	0.0	20.0	48.6	31.4	0.0	7.7	19.8	43.9	28.6	0.0
Lima CSA	0.9	3	1.5	0.0	66.7	0.0	33.3	0.0	4.6	15.4	46.6	33.4	0.0
Toledo CSA	17.4	29	14.9	10.3	17.2	34.5	37.9	0.0	10.0	15.4	43.7	30.2	0.7
OH Non-MSA	1.9	6	3.1	0.0	83.3	16.7	0.0	0.0	2.7	27.6	56.4	10.1	3.2

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below and in moderate-income geographies approximated the percentage of the population living within those geographies. Examiners gave positive consideration for five branches in middle- and upper income geographies that were on the opposite side of the street from low- or moderate-income geographies.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 106 ATMs in the AA, of which 90 were deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	N
Columbus CSA	1	5	0	-1	-4	1	0
Cleveland CSA	1	13	0	-1	-9	-2	0
Dayton CSA	2	12	0	-3	-7	0	0
Lima CSA	0	1	0	0	-1	0	0
Toledo CSA	0	6	-1	0	-4	-1	0
OH, Non-MSA	0	3	0	-1	-2	0	0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. In the Columbus CSA, the bank opened one branch during the evaluation period in an upper-income geography, and closed five branches, one which was in a moderate-income geography. Branch closures resulted from lower market activity and demand with several branches consolidated into nearby locations.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AAs, particularly low- and moderate-income geographies and/or individuals. Average hours at branches in low- and moderate-income geographies were comparable to branches in middle- and upper income geographies.

### Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 366 qualified CD service activities to over 100 organizations logging 9,764 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 181 of these activities with employees providing 4,122 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and affordable housing needs.

The following are examples of CD services provided in this AA:

- An employee served as board president of an affordable housing organization. The employee provided over 240 hours of service.
- Bank staff provided 68 financial education programs, including 28 YBC sessions to 1,100 students.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Toledo CSA and OH Non-MSA AAs is consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance under the Service Test in the Cleveland CSA, Dayton CSA, and Lima CSA AAs is weaker than the bank's overall performance under the Service Test in the full-scope areas due to weaker branch distribution. Performance in the limited-scope areas lowered the Service Test rating in Ohio.

## State of South Carolina

**CRA rating for the State of South Carolina:** Satisfactory

**The Lending Test is rated:** Low Satisfactory

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distribution of loans and the overall distribution of loans by borrower income and businesses of different sizes were adequate given the limited branch presence and short evaluation period.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an adequate level of qualified investments, grants, and donations.
- The bank's branches were reasonably accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in South Carolina

FTB entered the state of South Carolina in September 2020 with the opening of one branch in Greenville, SC. The bank delineated a portion of the Greenville-Anderson, SC (Greenville) MSA to include Greenville County as its AA.

South Carolina was FTB's smallest rating area based on total deposits. The bank had one branch, \$6.2 million in deposits, and very minimal deposit market share. The bank ranked last of 30 FDIC-insured banks operating in the AA, given its recent entry into the state. The top three banks and their deposit market share were Wells Fargo Bank, N.A. (16.6 percent), Truist Bank (16.2 percent), and Bank of America, N.A. (12.1 percent). During the evaluation period, the bank made \$80.4 million or 0.1 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Greenville MSA

The following table provides a summary of the demographics, including housing, business, and economic business information for the Greenville MSA AA.

**Table A – Demographic Information of the Assessment Area****Assessment Area: Greenville MSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	111	9.9	22.5	34.2	33.3	0.0
Population by Geography	474,903	6.8	17.3	35.9	40.1	0.0
Housing Units by Geography	199,369	7.0	18.3	36.0	38.7	0.0
Owner-Occupied Units by Geography	118,621	3.9	13.9	36.4	45.9	0.0
Occupied Rental Units by Geography	61,241	11.8	25.6	34.8	27.7	0.0
Vacant Units by Geography	19,507	10.5	22.8	37.1	29.6	0.0
Businesses by Geography	39,059	6.9	14.8	32.0	46.3	0.0
Farms by Geography	849	4.0	12.2	42.3	41.5	0.0
Family Distribution by Income Level	120,620	21.1	15.2	18.1	45.5	0.0
Household Distribution by Income Level	179,862	22.8	14.9	15.8	46.5	0.0
Median Family Income MSA - 24860 Greenville-Anderson, SC MSA		\$58,097	Median Housing Value			\$159,446
			Median Gross Rent			\$776
			Families Below Poverty Level			11.8%

Source: 2015 ACS and 2021 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.

According to Moody's Analytics, Greenville's recovery is gathering momentum. Job growth edged higher, outpacing the U.S. average in November 2021 for the first time since February. Key professional/business services and healthcare sectors have headlined job gains, though retrenching by goods-producing industries and leisure/hospitality offset some of the gains. The unemployment rate is the lowest in the state despite the steady flow of workers entering the labor force. Top employers include Prisma Health, Michelin North America, Clemson University, and Milliken & Company.

Favorable demographics will power robust job gains in healthcare in the years ahead. Despite the damage caused by the pandemic, Greenville's healthcare sector has performed exceptionally well, recovering 85 percent of its recessionary job losses compared with only 73 percent nationally. Greenville's healthcare system will still face stress from the pandemic well into 2022, but the metro area's rapidly expanding population will ensure healthcare providers continue to add staff. Over the next decade, Greenville's fastest growing cohort will be those age 65 and older. Growth in this cohort, the primary consumers of health services, will increase demand for a wide range of medical services.

The housing market is providing growth, with strong demand and limited supply fueling a rapid pace of new home construction. The metro area's single-family housing market has been strong, with housing starts on pace for one of their best years on record. Rising mortgage rates and housing costs in the coming quarters will drag demand, but above-average population growth will generate plenty of demand to keep builders busy for years to come.

## Scope of Evaluation in South Carolina

The Greenville MSA received a full-scope review. The bank entered the South Carolina market in September 2020. The evaluation period consists of one year, from January 1, 2021, to December 31, 2021. Performance in this area was given minimal weight, given the one year of data.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

The bank's performance under the Lending Test in South Carolina is rated Low Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greenville MSA AA was adequate, given the brief evaluation period for performance.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Greenville MSA	268	32	0	0	300
Total	268	32	0	0	300

Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Greenville MSA	71,754	8,617	0	0	80,371
Total	71,754	8,617	0	0	80,371

FTB had very minimal deposit market share. The bank ranked 30<sup>th</sup> among the 30 FDIC-insured banks, having entered the Greenville market in late 2020 and maintaining a single branch office.

The bank had market share of 0.3 percent based on the number of home mortgage loans originated or purchased and ranked 78<sup>th</sup> among 557 home mortgage lenders in the AA, which placed it in the top 15 percent of lenders. The top three lenders with a combined market share of 15 percent were Rocket Mortgage (7.5 percent), Truist Bank (4 percent), and Wells Fargo Bank, N.A. (3.5 percent).

The bank had market share of 0.1 percent based on the number of small loans to businesses originated or purchased and ranked 45<sup>th</sup> out of 151 small business lenders, which placed it in the top 31 percent of lenders. The top three lenders with a combined market share of 32.7 percent were American Express National Bank (13.9 percent), Bank of America, N.A. (9.7 percent), and Wells Fargo Bank, N.A. (9.1 percent).

### Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA given the limited branch presence and short evaluation period. For this analysis, examiners compared the bank's public data of HMDA and small

loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below both the percentage of owner-occupied homes in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was significantly below the percentage of owner-occupied homes in moderate-income geographies and was well below the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low- and moderate-income geographies exceeded the percentage of businesses in those geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an adequate distribution of loans among individuals of different income levels and business of different sizes, given the limited branch presence and short evaluation period.

### ***Home Mortgage Loans***

Refer to Table P in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but near the aggregate distribution of loans by all lenders. The percentage of home

mortgage loans to moderate-income borrowers was significantly below both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table R in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate, given the limited branch presence and short evaluation period.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 28.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### **Community Development Lending**

The bank made no CD loans. CD lending had minimal effect on the Lending Test in South Carolina, given the limited branch presence and length of the evaluation period in which the bank operated in the AA. The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

### **Product Innovation and Flexibility**

The bank made limited use of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 10 loans under flexible lending programs specific to the AA totaling \$2.3 million. Program volumes included eight FHA loans totaling \$1.7 million and two VA loans totaling \$587,000. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## **INVESTMENT TEST**

The institution's performance under the Investment Test in South Carolina is rated Low Satisfactory.

Based on a full-scope review, FTB's performance in South Carolina was adequate, given the limited branch presence and short evaluation period.

### **Number and Amount of Qualified Investments**

The institution had an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.



Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Greenville MSA	0	0	2	15	2	100.0	15	100.0	0	0

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

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

FTB made two donations totaling \$15,000 to an organization that distributes food to low- and moderate-income residents at risk of hunger and malnutrition. The dollar volume of current period investments represented 2.5 percent of allocated tier 1 capital.

The institution exhibits adequate responsiveness to credit and community economic development needs. By dollar volume, 100 percent of funded community services were provided to low- and moderate-income individuals. The institution did not use innovative and/or complex investments to support CD initiatives.

## SERVICE TEST

The bank's performance under the Service Test in South Carolina is rated Low Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greenville MSA AA was adequate.

## Retail Banking Services

Distribution of Branch Delivery System														
Assessment Area	Deposits	Branches							Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Greenville MSA	100.0	1	100.0	100.0	0.0	0.0	0.0	0.0	0.0	6.8	17.3	35.9	40.1	0.0

\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA, giving consideration that the bank opened its one branch in late 2020. The branch was opened in a low-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had two ATMs in the AA, one which was deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Greenville MSA	1	0	1	0	0	0	0

The institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened one branch in a low-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The branch was open an average of 45 hours per week.

### **Community Development Services**

The institution provided few if any CD services.

## State of Tennessee

**CRA rating for the State of Tennessee:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distribution and the overall distribution of loans by borrower income and businesses of different sizes were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an adequate level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Tennessee

FTB delineated two AAs in the state of Tennessee. They include a portion of the Nashville-Davidson-Murfreesboro-Franklin MSA (Nashville MSA) and a portion of the Knoxville MSA. Refer to the table in appendix A for a list of the counties reviewed.

Tennessee was FTB's ninth largest rating area based on total deposits. The bank had approximately \$3.6 billion in deposits, representing 2.1 percent of its total deposits. The combined areas were served by 69 FDIC-insured banks operating 572 branches. FTB ranked seventh with 3.8 percent deposit market share. The top three banks and their deposit market share include Pinnacle Bank (16.7 percent), Bank of America, N.A. (15.8 percent), and Regions Bank (12.5 percent). FTB operated 40 branches and 48 ATMs in the combined areas. During the evaluation period, the bank made \$1.5 billion or 2.1 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Nashville MSA

The following table provides a summary of the demographics, including housing, business, and economic business information for the Nashville MSA AA.

**Table A – Demographic Information of the Assessment Area****Assessment Area: Nashville MSA**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	289	10.4	22.1	35.6	30.1	1.7
Population by Geography	1,310,143	7.8	22.4	36.5	32.9	0.4
Housing Units by Geography	537,903	8.2	23.1	36.7	31.9	0.1
Owner-Occupied Units by Geography	311,045	3.8	15.8	39.7	40.6	0.1
Occupied Rental Units by Geography	185,730	14.3	34.1	32.5	19.0	0.0
Vacant Units by Geography	41,128	13.4	28.4	33.3	24.8	0.1
Businesses by Geography	160,700	7.8	18.3	27.6	45.3	0.9
Farms by Geography	3,172	4.5	14.5	36.8	43.6	0.6
Family Distribution by Income Level	318,234	20.0	16.7	19.8	43.5	0.0
Household Distribution by Income Level	496,775	22.1	16.5	18.0	43.4	0.0
Median Family Income MSA - 34980 Nashville-Davidson--Murfreesboro--Franklin, TN MSA	\$66,441	Median Housing Value				\$213,057
		Median Gross Rent				\$914
		Families Below Poverty Level				9.9%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%.</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$33,221 and moderate-income families earned less than \$53,153. The median housing value in the AA is \$213,057. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$831 for a low-income borrower and \$1,329 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,205. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 9.9 percent of families were living below the poverty level.

### **Economic Data**

According to Moody's Analytics, manufacturing, state government, and tourism are key economic drivers. The metropolitan area had significant strengths coming out of the COVID-19 pandemic including a favorable business tax structure, a large concentration of prime-age workers, and net migration into the area. As such, housing prices have accelerated and are some of the highest of southern metro areas. Supply chain shortages with semiconductor shortages have disrupted the economy, including auto manufacturing plants. The return of

tourism should bolster the local economy. Major employers include Vanderbilt University Medical Center, Nissan North America, HCA Inc., Vanderbilt University, and Saint Thomas Health Services.

The unemployment rate for the Nashville MSA area was 2.7 percent as of December 2021 and the national unemployment rate was 3.7 percent.

### Community Contacts

The OCC reviewed three community contacts made during the evaluation period as part of the CRA examination. Two contacts worked at economic development agencies, while the other worked at an organization focused on affordable housing. Contacts expressed that the MSA has experienced considerable growth over the past few years, making it one of the robust local economies not only in Tennessee, but the entire United States. This has led to appreciating real estate and home prices in the area. All three contacts indicated the primary and most pressing need in the MSA is affordable housing. Contacts also expressed secondary needs in the MSA associated with challenges in the housing space. The greatest needs include:

- Affordable housing.
- Rapid re-housing programs that move people quickly back into housing.
- Volunteers and grants to assist homeless shelters.

### Scope of Evaluation in Tennessee

The Nashville MSA received a full-scope review. This AA represented 97 percent of deposits and 92 percent of lending in the rating area. The Knoxville MSA received a limited-scope review. FTB did not originate or purchase enough small loans to farms in the state of Tennessee to conduct a meaningful analysis.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

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

### LENDING TEST

#### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA AA was excellent.

#### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Nashville MSA	5,089	2,264	8	25	7,386	91.9	97.0
Knoxville MSA	486	163	0	2	651	8.1	3.0
Total	5,575	2,427	8	27	8,037	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<b>Dollar Volume of Loans* (\$000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Nashville MSA	1,277,480	133,391	144	116,274	1,527,289	91.1	97.0
Knoxville MSA	99,250	17,080	0	32,167	148,497	8.9	3.0
<b>Total</b>	<b>1,376,730</b>	<b>150,471</b>	<b>144</b>	<b>148,441</b>	<b>1,675,786</b>	<b>100.0</b>	<b>100.0</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had deposit market share of 4.5 percent and ranked seventh among 56 depository financial institutions placing it in the top 13 percent of banks.

The bank had a market share of 1.1 percent based on the number of home mortgage loans originated or purchased and ranked 25<sup>th</sup> among 866 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 12.2 percent were Rocket Mortgage (5.7 percent), U.S. Bank, N.A. (3.4 percent), and FirstBank (3.1 percent).

The bank had a market share of 2.1 percent based on the number of small loans to businesses originated or purchased and ranked 12<sup>th</sup> out of 248 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 35.6 percent were American Express National Bank (13.7 percent), Pinnacle Bank (11.1 percent), and First Horizon Bank (10.8 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA and small loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies approximated the percentage of owner-occupied homes in low-income geographies but was below the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

#### ***Small Loans to Businesses***

Refer to Table Q in the state of Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies equaled the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of Tennessee section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 20.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test in Tennessee.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 25 CD loans totaling nearly \$116.3 million, which represented 32.9 percent of allocated tier 1 capital. CD loans were primarily made for revitalization/stabilization purposes. By dollar volume, 26.7 percent of these loans funded affordable housing, 14.2 percent funded economic development, 29.7 percent funded revitalization and stabilization efforts, and 29.4 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$17.5 million loan to develop 147 units of workforce housing in Nashville, TN. The project also received LIHTC financing through the Tennessee Housing and Development Agency and a \$2 million contribution from a local housing trust fund.
- \$7.2 million PPP loan to a medical facility located in a low-income geography to allow it to fund critical business operations.
- \$70,000 loan to a local CDC that provides affordable rental housing units and builds and rehabs housing for low- and moderate-income families in Davidson County. The CDC is a HUD certified housing counseling agency, which enables individuals to access down payment assistance programs and special mortgage products through homebuyer education classes.

### **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 154 loans under flexible lending programs specific to the AA totaling \$35.8 million. Program volumes included 74 FHA loans totaling \$17 million, 29 Freddie Mac HP loans totaling \$6.8 million, one Freddie Mac RP loan totaling \$144,000, 11 Fannie Mae HR loans totaling \$2.5 million, one USDA/RA loan totaling \$218,000, and 38 VA loans totaling \$9.2 million.

### **Conclusions for Area Receiving a Limited-Scope Review**

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

Refer to Tables O through T in the state of Tennessee section of appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

The institution's performance under the Investment Test in Tennessee is rated Low Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the FTB's performance in the Nashville MSA was adequate. Performance in the limited-scope area had a minimal effect on the Investment Test rating in Tennessee.



## Number and Amount of Qualified Investments

The institution had an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Nashville MSA	7	8,802	179	15,263	186	86.9	24,065	71.8	7	1,441
Knoxville MSA	2	101	26	9,351	28	13.1	9,452	28.2	0	0
Total	9	8,903	205	24,614	214	100.0	33,517	100.0	7	1,441

\*The table present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

The bank made 179 investments totaling \$15.2 million during the evaluation period to nearly 80 organizations/projects. The dollar volume of current and prior period investments represented 6.8 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 90 percent of investments supported affordable housing, six percent funded community services to low- and moderate-income individuals, three percent supported economic development and, one percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made LIHTC investments in the current period, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$12.4 million investment to support development of a new 60-unit LIHTC complex in Lascassas, TN.
- Multiple investments totaling \$1.1 million in a qualified CRA affordable housing fund for properties located in Nashville.
- \$33,000 investment served as seed money to establish a micro business recovery fund that will provide grants of \$5,000 to \$25,000 to businesses with four or fewer employees and grants of \$30,000 to \$100,000 to businesses with fifty or fewer employees in low- and moderate-income areas of Nashville that have been severely impacted by COVID-19.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Knoxville MSA AA was stronger than the bank's overall performance under the Investment Test in the full-scope area. Stronger performance was a result of higher level of investments relative to the AA. Performance in the limited-scope area had a minimal effect on the Investment Test rating in Tennessee.

## SERVICE TEST

The bank's performance under the Service Test in Tennessee is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA AA was excellent.

### Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Nashville MSA	97	38	95	5.3	21.1	21.1	52.6	0.0	7.8	22.4	36.5	32.9	0.4
Knoxville MSA	3	2	5	0.0	0.0	100.0	0.0	0.0	6.5	16.6	39.1	36.5	1.3

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below and in moderate-income geographies approximated the percentage of the population living within those geographies. Examiners gave positive consideration for two branches in middle- and upper income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 120 ATMs in the AA, of which 46 were deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Nashville MSA	6	1	0	0	1	4	0
Knoxville MSA	0	1	0	0	-1	0	0

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened six branches and closed one branch, all in middle- and upper income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours for branches in low- and moderate-income geographies were the same compared to branches in middle- and upper income geographies.

## **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 228 qualified CD service activities to 25 organizations logging 3,379 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 104 of these activities with 24 employees providing 1,291 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and affordable housing needs.

The following are examples of CD services provided in this AA:

- An employee served on the board and executive committee and chaired the finance committee of an organization that provides transitional housing and support to individuals recently released from incarceration. The employee provided 120 hours of service.
- Bank staff provided 63 financial education programs, which included three YBC sessions for nearly 100 students.

## **Conclusions for the Area Receiving Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Service Test in the Knoxville MSA AA was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope review had a minimal effect on the Service Test rating for the state of Tennessee.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2017 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, small farm, community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Fifth Third Community Development Corporation	wholly owned, indirect subsidiary of bank	CD loans and qualified investments
Fifth Third Foundation	Bank subsidiary	Qualified investments (grants/donations)
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>MMSAs</b>		
Charleston CSA	Full-Scope	KY: Boyd County OH: Non-MSA County: Scioto WV: Cabell, Putnam, Wayne; Charleston MSA #16620 (Kanawha County)
Chicago CSA	Full-Scope	IL: Cook, DuPage, McHenry Will, DeKalb, Kane, Kendall, Lake Counties IN: Jasper, Lake, and Porter Counties; Michigan City MSA #33140 (La Porte County)
Cincinnati CSA	Full-Scope	IN: Dearborn County KY: Boone, Campbell, Grant, Kenton, and Pendleton Counties OH: Brown, Butler, Clermont, Hamilton, and Warren Counties; OH Non-MSA County: Clinton
Evansville MMSA	Full-Scope	IN: Posey, Vanderburgh, and Warrick Counties KY: Henderson County
Louisville MMSA	Full-Scope	IN: Clark and Floyd Counties KY: Jefferson, Oldham, and Shelby Counties
South Bend CSA	Full-Scope	IN: South Bend MSA #43780 (St. Joseph County); Elkhart MSA #21140 (Elkhart County) MI: Niles MSA #35660 (Berrien County); South Bend MSA #43780 (Cass County)
<b>STATES</b>		
<b>FLORIDA</b>		
Cape Coral CSA	Limited-Scope	Cape Coral MSA #15980 (Lee County); Naples MSA #34940 (Collier County)
Jacksonville MSA	Limited-Scope	Clay, Duvall, and St. Johns Counties
Miami MSA	Limited-Scope	Broward, Miami-Dade, and Palm Beach Counties
North Port CSA	Limited-Scope	North Port MSA #35840 (Manatee and Sarasota Counties); Punta Gorda MSA #39460 (Charlotte County)
Orlando CSA	Limited-Scope	Orlando MSA #36740 (Lake, Orange, Osceola, and Seminole Counties); Deltona MSA #19660 (Volusia County); Lakeland MSA #29460 (Polk County)
Tampa MSA	Full-Scope	Hillsborough, Pasco, and Pinellas Counties

<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>GEORGIA</b>		
Atlanta MSA	Full-Scope	Cobb, De Kalb, Forsyth, Fulton, Gwinnett, and Walton Counties
Augusta MSA	Limited-Scope	Columbia and Richmond Counties
<b>ILLINOIS</b>		
Carbondale MSA	Limited-Scope	Williamson County
Rockford CSA	Limited-Scope	Rockford MSA #40420 (Winnebago County), IL Non-MSA County: Stephenson
IL Non-MSA	Full-Scope	Effingham, Jefferson, and Whiteside Counties
<b>INDIANA</b>		
Bloomington MSA	Limited-Scope	Monroe County
Fort Wayne CSA	Limited-Scope	Fort Wayne MSA #23060 (Allen County); IN Non-MSA Counties: Adams and Steuben
Indianapolis CSA	Full-Scope	Columbus MSA# 18020 (Bartholomew County); Indianapolis MSA #26900 (Brown, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, and Shelby Counties); IN Non-MSA County: Decatur
Lafayette MSA	Limited-Scope	Tippecanoe County
Terre-Haute MSA	Limited-Scope	Clay, Parke, Vermillion, and Vigo Counties
IN Non-MSA	Limited-Scope	Dubois, Fayette, Gibson, Knox, Orange, Perry, Ripley, Spencer, and Sullivan Counties
<b>KENTUCKY</b>		
Lexington MSA	Full-Scope	Lexington MSA #30460 (Bourbon, Fayette, Jessamine, Scott Counties); KY Non-MSA Counties: Franklin and Madison
Owensboro MSA	Limited-Scope	Daviess County
KY Non-MSA	Limited-Scope	Harrison, Hopkins, Lyon, Mercer, and Union Counties
<b>MICHIGAN</b>		
Detroit CSA	Full-Scope	Ann Arbor MSA #11460 (Washtenaw County); Detroit MD #19804 (Wayne County); Flint MSA #22420 (Genesee County); Monroe MSA #33780 (Monroe County); Warren MD #47664 (Livingston, Macomb, Oakland, and St. Clair Counties)
Grand Rapids CSA	Limited-Scope	Grand Rapids MSA #24340 (Kent, Montcalm, and Ottawa Counties); Muskegon MSA #34740 (Muskegon County); MI Non-MSA Counties: Allegan, Mecosta
Jackson MSA	Limited-Scope	Jackson County
Kalamazoo CSA	Limited-Scope	Battle Creek MSA #12980 (Calhoun County); Kalamazoo MSA#28020 (Kalamazoo County); MI Non-MSA County: St. Joseph County
Lansing MSA	Limited-Scope	Lansing MSA #29620 (Clinton, Eaton, Ingham, and Shiawassee Counties)
Saginaw CSA	Limited-Scope	Bay City MSA #13020 (Bay County); Midland MSA #33320 (Midland County); Saginaw MSA #40980 (Saginaw County)
MI Non-MSA	Limited-Scope	Antrim, Emmet, Grand Traverse, Hillsdale, Isabella, Leelanau, Mason, Missaukee, Newaygo, Oceana, Otsego, Van Buren, and Wexford Counties
<b>NORTH CAROLINA</b>		
Asheville CSA	Limited-Scope	Asheville MSA #11700 (Buncombe County); NC Non-MSA Counties: McDowell and Transylvania Counties

<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Charlotte CSA	Full-Scope	Charlotte MSA #16740 (Cabarrus, Iredell, Lincoln, Mecklenburg, Rowan, and Union Counties); NC Non-MSA County: Cleveland
Hickory MSA	Limited-Scope	Catawba County
Raleigh CSA	Limited-Scope	Durham MSA #20500 (Durham and Orange Counties); Raleigh MSA #39580 (Wake County)
NC Non-MSA	Limited-Scope	Alleghany, Ashe, Avery, and Rutherford Counties
<b>OHIO</b>		
Cleveland CSA	Limited-Scope	Akron MSA #10420 (Portage and Summit Counties); Canton MSA #15940 (Starke County); Cleveland MSA #17460 (Cuyahoga, Geauga, Lake, Lorain, and Medina Counties); OH Non-MSA County: Erie
Columbus CSA	Full-Scope	Columbus MSA #18140 (Delaware, Fairfield, Franklin, Hocking, Licking, Pickaway, and Union Counties); OH Non-MSA Counties: Fayette, Logan, Marion, and Ross
Dayton CSA	Limited-Scope	Dayton MSA #19430 (Greene, Miami, Montgomery Counties); Springfield MSA #44220 (Clark County); OH Non-MSA Counties: Champaign, Darke, and Shelby
Lima CSA	Limited-Scope	Lima MSA #30620 (Allen County); OH Non-MSA County: Auglaize
Toledo CSA	Limited-Scope	Toledo MSA #45780 (Fulton, Lucas, and Wood Counties); OH Non-MSA Counties: Hancock, Sandusky, Seneca
OH Non-MSA	Limited-Scope	Adams, Athens, Defiance, Highland, Pike, and Preble Counties
<b>SOUTH CAROLINA</b>		
Greenville MSA	Full-Scope	Greenville County
<b>TENNESSEE</b>		
Knoxville MSA	Limited-Scope	Knox County
Nashville MSA	Full-Scope	Davidson, Rutherford, Sumner, and Williamson Counties

## Appendix B: Summary of MMSA and State Ratings

RATINGS Fifth Third Bank, National Association				
	<b>Lending Test Rating*</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
Overall Bank:	Outstanding	Outstanding	Outstanding	Outstanding
MMSA or State:				
Charleston CSA	Outstanding	Outstanding	Outstanding	Outstanding
Chicago CSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Cincinnati CSA	Outstanding	Outstanding	Outstanding	Outstanding
Evansville MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Louisville MMSA	Outstanding	Outstanding	Outstanding	Outstanding
South Bend CSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Florida	Outstanding	Outstanding	High Satisfactory	Outstanding
Georgia	High Satisfactory	Outstanding	Outstanding	Outstanding
Illinois	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Indiana	Outstanding	Outstanding	Outstanding	Outstanding
Kentucky	Outstanding	High Satisfactory	Outstanding	Outstanding
Michigan	Outstanding	Outstanding	Outstanding	Outstanding
North Carolina	Outstanding	Outstanding	Outstanding	Outstanding
Ohio	Outstanding	Outstanding	High Satisfactory	Outstanding
South Carolina	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Tennessee	Outstanding	Low Satisfactory	Outstanding	Outstanding

\* The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## Appendix C: Definitions and Common Abbreviations

---

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male



householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and Total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, Total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

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

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

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

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The Total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Appendix D: Tables of Performance Data

---

### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Charleston CSA	2,038	249,188	100.0	14,469	2.2	1.1	1.7	14.3	14.1	10.2	52.2	49.1	47.3	31.2	35.7	40.8	0.0	0.0	0.1	
<b>Total</b>	<b>2,038</b>	<b>249,188</b>	<b>100.0</b>	<b>14,469</b>	<b>2.2</b>	<b>1.1</b>	<b>1.7</b>	<b>14.3</b>	<b>14.1</b>	<b>10.2</b>	<b>52.2</b>	<b>49.1</b>	<b>47.3</b>	<b>31.2</b>	<b>35.7</b>	<b>40.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.1</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Charleston CSA	2,038	249,188	100.0	14,469	22.5	7.8	6.1	16.6	17.4	16.0	19.5	23.2	20.8	41.4	48.8	40.8	0.0	2.8	16.3	
<b>Total</b>	<b>2,038</b>	<b>249,188</b>	<b>100.0</b>	<b>14,469</b>	<b>22.5</b>	<b>7.8</b>	<b>6.1</b>	<b>16.6</b>	<b>17.4</b>	<b>16.0</b>	<b>19.5</b>	<b>23.2</b>	<b>20.8</b>	<b>41.4</b>	<b>48.8</b>	<b>40.8</b>	<b>0.0</b>	<b>2.8</b>	<b>16.3</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Charleston CSA	582	64,605	100.0	8,485	8.3	8.4	10.1	14.9	17.7	15.0	46.3	40.9	44.7	30.2	33.0	30.2	0.3	0.0	0.0	
<b>Total</b>	<b>582</b>	<b>64,605</b>	<b>100.0</b>	<b>8,485</b>	<b>8.3</b>	<b>8.4</b>	<b>10.1</b>	<b>14.9</b>	<b>17.7</b>	<b>15.0</b>	<b>46.3</b>	<b>40.9</b>	<b>44.7</b>	<b>30.2</b>	<b>33.0</b>	<b>30.2</b>	<b>0.3</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Charleston CSA	582	64,605	100.0	8,485	80.1	58.6	32.2	5.2	27.3	14.6	14.1	
<b>Total</b>	<b>582</b>	<b>64,605</b>	<b>100.0</b>	<b>8,485</b>	<b>80.1</b>	<b>58.6</b>	<b>32.2</b>	<b>5.2</b>	<b>27.3</b>	<b>14.6</b>	<b>14.1</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Charleston CSA	3	96	100.0	65	3.9	33.3	1.5	13.0	33.3	10.8	52.0	33.3	63.1	31.1	0.0	24.6	0.0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>96</b>	<b>100.0</b>	<b>65</b>	<b>3.9</b>	<b>33.3</b>	<b>1.5</b>	<b>13.0</b>	<b>33.3</b>	<b>10.8</b>	<b>52.0</b>	<b>33.3</b>	<b>63.1</b>	<b>31.1</b>	<b>0.0</b>	<b>24.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Charleston CSA	3	96	100.0	65	96.6	100.0	29.2	1.4	0.0	2.0	0.0	
<b>Total</b>	<b>3</b>	<b>96</b>	<b>100.0</b>	<b>65</b>	<b>96.6</b>	<b>100.0</b>	<b>29.2</b>	<b>1.4</b>	<b>0.0</b>	<b>2.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Chicago CSA	33,383	7,824,369	100.0	508,462	4.4	3.6	3.0	17.4	15.6	13.1	35.4	31.1	33.7	42.7	49.5	50.1	0.1	0.1	0.1
<b>Total</b>	<b>33,383</b>	<b>7,824,369</b>	<b>100.0</b>	<b>508,462</b>	<b>4.4</b>	<b>3.6</b>	<b>3.0</b>	<b>17.4</b>	<b>15.6</b>	<b>13.1</b>	<b>35.4</b>	<b>31.1</b>	<b>33.7</b>	<b>42.7</b>	<b>49.5</b>	<b>50.1</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>

*Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago CSA	33,383	7,824,369	100.0	508,462	23.3	12.7	6.3	16.3	17.4	16.3	18.7	19.4	21.1	41.7	42.1	39.8	0.0	8.3	16.5
<b>Total</b>	<b>33,383</b>	<b>7,824,369</b>	<b>100.0</b>	<b>508,462</b>	<b>23.3</b>	<b>12.7</b>	<b>6.3</b>	<b>16.3</b>	<b>17.4</b>	<b>16.3</b>	<b>18.7</b>	<b>19.4</b>	<b>21.1</b>	<b>41.7</b>	<b>42.1</b>	<b>39.8</b>	<b>0.0</b>	<b>8.3</b>	<b>16.5</b>

*Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago CSA	25,496	3,001,170	100.0	273,274	6.1	5.2	5.1	16.7	15.9	15.7	29.4	32.3	30.5	47.4	46.3	48.4	0.4	0.3	0.3
<b>Total</b>	<b>25,496</b>	<b>3,001,170</b>	<b>100.0</b>	<b>273,274</b>	<b>6.1</b>	<b>5.2</b>	<b>5.1</b>	<b>16.7</b>	<b>15.9</b>	<b>15.7</b>	<b>29.4</b>	<b>32.3</b>	<b>30.5</b>	<b>47.4</b>	<b>46.3</b>	<b>48.4</b>	<b>0.4</b>	<b>0.3</b>	<b>0.3</b>

*Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Chicago CSA	25,496	3,001,170	100.0	273,274	86.9	61.5	37.6	4.9	24.9	8.3	13.6	
<b>Total</b>	<b>25,496</b>	<b>3,001,170</b>	<b>100.0</b>	<b>273,274</b>	<b>86.9</b>	<b>61.5</b>	<b>37.6</b>	<b>4.9</b>	<b>24.9</b>	<b>8.3</b>	<b>13.6</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Chicago CSA	67	3,857	100.0	1,136	3.5	4.5	1.0	14.7	10.4	6.3	40.0	47.8	60.0	41.7	37.3	32.7	0.1	0.0	0.0	
<b>Total</b>	<b>67</b>	<b>3,857</b>	<b>100.0</b>	<b>1,136</b>	<b>3.5</b>	<b>4.5</b>	<b>1.0</b>	<b>14.7</b>	<b>10.4</b>	<b>6.3</b>	<b>40.0</b>	<b>47.8</b>	<b>60.0</b>	<b>41.7</b>	<b>37.3</b>	<b>32.7</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Chicago CSA	67	3,857	100.0	1,136	94.9	79.1	56.9	3.1	6.0	2.0	14.9	
<b>Total</b>	<b>67</b>	<b>3,857</b>	<b>100.0</b>	<b>1,136</b>	<b>94.9</b>	<b>79.1</b>	<b>56.9</b>	<b>3.1</b>	<b>6.0</b>	<b>2.0</b>	<b>14.9</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.



Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Cincinnati CSA	31,923	4,667,869	100.0	133,926	3.8	3.3	3.2	16.4	14.4	14.1	43.6	40.6	42.0	36.0	41.7	40.6	0.1	0.1	0.1	
<b>Total</b>	<b>31,923</b>	<b>4,667,869</b>	<b>100.0</b>	<b>133,926</b>	<b>3.8</b>	<b>3.3</b>	<b>3.2</b>	<b>16.4</b>	<b>14.4</b>	<b>14.1</b>	<b>43.6</b>	<b>40.6</b>	<b>42.0</b>	<b>36.0</b>	<b>41.7</b>	<b>40.6</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Cincinnati CSA	31,923	4,667,869	100.0	133,926	22.1	13.8	7.8	16.8	20.5	19.0	20.0	20.6	21.0	41.2	34.1	36.4	0.0	11.0	15.7	
<b>Total</b>	<b>31,923</b>	<b>4,667,869</b>	<b>100.0</b>	<b>133,926</b>	<b>22.1</b>	<b>13.8</b>	<b>7.8</b>	<b>16.8</b>	<b>20.5</b>	<b>19.0</b>	<b>20.0</b>	<b>20.6</b>	<b>21.0</b>	<b>41.2</b>	<b>34.1</b>	<b>36.4</b>	<b>0.0</b>	<b>11.0</b>	<b>15.7</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Cincinnati CSA	13,515	1,495,643	100.0	45,450	6.5	6.8	6.7	19.5	17.5	18.2	36.8	33.3	35.6	36.1	41.2	38.8	1.0	1.1	0.8	
<b>Total</b>	<b>13,515</b>	<b>1,495,643</b>	<b>100.0</b>	<b>45,450</b>	<b>6.5</b>	<b>6.8</b>	<b>6.7</b>	<b>19.5</b>	<b>17.5</b>	<b>18.2</b>	<b>36.8</b>	<b>33.3</b>	<b>35.6</b>	<b>36.1</b>	<b>41.2</b>	<b>38.8</b>	<b>1.0</b>	<b>1.1</b>	<b>0.8</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cincinnati CSA	13,515	1,495,643	100.0	45,450	83.0	61.7	44.1	5.3	24.4	11.6	13.9	
<b>Total</b>	<b>13,515</b>	<b>1,495,643</b>	<b>100.0</b>	<b>45,450</b>	<b>83.0</b>	<b>61.7</b>	<b>44.1</b>	<b>5.3</b>	<b>24.4</b>	<b>11.6</b>	<b>13.9</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Cincinnati CSA	144	4,852	100.0	315	3.2	1.4	2.9	16.3	19.4	17.1	49.6	69.4	53.0	30.9	9.7	27.0	0.1	0.0	0.0	
<b>Total</b>	<b>144</b>	<b>4,852</b>	<b>100.0</b>	<b>315</b>	<b>3.2</b>	<b>1.4</b>	<b>2.9</b>	<b>16.3</b>	<b>19.4</b>	<b>17.1</b>	<b>49.6</b>	<b>69.4</b>	<b>53.0</b>	<b>30.9</b>	<b>9.7</b>	<b>27.0</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Cincinnati CSA	144	4,852	100.0	315	96.6	72.2	57.5	1.6	4.2	1.8	23.6	
<b>Total</b>	<b>144</b>	<b>4,852</b>	<b>100.0</b>	<b>315</b>	<b>96.6</b>	<b>72.2</b>	<b>57.5</b>	<b>1.6</b>	<b>4.2</b>	<b>1.8</b>	<b>23.6</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Evansville MMSA	3,625	388,438	100.0	16,886	5.7	3.3	3.5	13.6	12.1	12.9	48.2	46.5	44.5	32.4	38.1	39.0	0.1	0.1	0.1	
<b>Total</b>	<b>3,625</b>	<b>388,438</b>	<b>100.0</b>	<b>16,886</b>	<b>5.7</b>	<b>3.3</b>	<b>3.5</b>	<b>13.6</b>	<b>12.1</b>	<b>12.9</b>	<b>48.2</b>	<b>46.5</b>	<b>44.5</b>	<b>32.4</b>	<b>38.1</b>	<b>39.0</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Evansville MMSA	3,625	388,438	100.0	16,886	21.3	17.4	11.7	17.6	24.4	20.9	20.6	22.9	19.8	40.4	31.6	23.7	0.0	3.7	23.9	
<b>Total</b>	<b>3,625</b>	<b>388,438</b>	<b>100.0</b>	<b>16,886</b>	<b>21.3</b>	<b>17.4</b>	<b>11.7</b>	<b>17.6</b>	<b>24.4</b>	<b>20.9</b>	<b>20.6</b>	<b>22.9</b>	<b>19.8</b>	<b>40.4</b>	<b>31.6</b>	<b>23.7</b>	<b>0.0</b>	<b>3.7</b>	<b>23.9</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Evansville MMSA	888	85,413	100.0	5,220	8.5	8.8	8.5	20.1	21.7	21.4	38.3	38.7	37.8	29.0	26.1	28.3	4.1	4.6	4.0	
<b>Total</b>	<b>888</b>	<b>85,413</b>	<b>100.0</b>	<b>5,220</b>	<b>8.5</b>	<b>8.8</b>	<b>8.5</b>	<b>20.1</b>	<b>21.7</b>	<b>21.4</b>	<b>38.3</b>	<b>38.7</b>	<b>37.8</b>	<b>29.0</b>	<b>26.1</b>	<b>28.3</b>	<b>4.1</b>	<b>4.6</b>	<b>4.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Evansville MMSA	888	85,413	100.0	5,220	83.8	69.4	32.9	4.9	21.6	11.2	9.0		
<b>Total</b>	<b>888</b>	<b>85,413</b>	<b>100.0</b>	<b>5,220</b>	<b>83.8</b>	<b>69.4</b>	<b>32.9</b>	<b>4.9</b>	<b>21.6</b>	<b>11.2</b>	<b>9.0</b>		

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-21	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Evansville MMSA	25	2,007	100.0	220	3.5	0.0	0.0	8.9	0.0	5.9	55.5	84.0	78.2	31.5	16.0	15.9	0.5	0.0	0.0	
<b>Total</b>	<b>25</b>	<b>2,007</b>	<b>100.0</b>	<b>220</b>	<b>3.5</b>	<b>0.0</b>	<b>0.0</b>	<b>8.9</b>	<b>0.0</b>	<b>5.9</b>	<b>55.5</b>	<b>84.0</b>	<b>78.2</b>	<b>31.5</b>	<b>16.0</b>	<b>15.9</b>	<b>0.5</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Evansville MMSA	25	2,007	100.0	220	98.0	68.0	62.7	0.9	8.0	1.0	24.0		
<b>Total</b>	<b>25</b>	<b>2,007</b>	<b>100.0</b>	<b>220</b>	<b>98.0</b>	<b>68.0</b>	<b>62.7</b>	<b>0.9</b>	<b>8.0</b>	<b>1.0</b>	<b>24.0</b>		

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Louisville MMSA	8,566	1,252,908	100.0	63,767	4.7	2.8	3.1	14.7	12.8	12.0	41.0	36.7	39.2	39.4	47.6	45.6	0.1	0.1	0.1	
<b>Total</b>	<b>8,566</b>	<b>1,252,908</b>	<b>100.0</b>	<b>63,767</b>	<b>4.7</b>	<b>2.8</b>	<b>3.1</b>	<b>14.7</b>	<b>12.8</b>	<b>12.0</b>	<b>41.0</b>	<b>36.7</b>	<b>39.2</b>	<b>39.4</b>	<b>47.6</b>	<b>45.6</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Louisville MMSA	8,566	1,252,908	100.0	63,767	21.1	13.4	8.9	17.3	21.8	20.6	19.7	22.1	20.1	42.0	39.4	33.6	0.0	3.4	16.9	
<b>Total</b>	<b>8,566</b>	<b>1,252,908</b>	<b>100.0</b>	<b>63,767</b>	<b>21.1</b>	<b>13.4</b>	<b>8.9</b>	<b>17.3</b>	<b>21.8</b>	<b>20.6</b>	<b>19.7</b>	<b>22.1</b>	<b>20.1</b>	<b>42.0</b>	<b>39.4</b>	<b>33.6</b>	<b>0.0</b>	<b>3.4</b>	<b>16.9</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Louisville MMSA	2,336	236,370	100.0	23,647	8.0	6.2	7.5	15.3	14.2	13.9	32.3	28.2	31.1	41.0	46.0	43.6	3.4	5.4	4.0	
<b>Total</b>	<b>2,336</b>	<b>236,370</b>	<b>100.0</b>	<b>23,647</b>	<b>8.0</b>	<b>6.2</b>	<b>7.5</b>	<b>15.3</b>	<b>14.2</b>	<b>13.9</b>	<b>32.3</b>	<b>28.2</b>	<b>31.1</b>	<b>41.0</b>	<b>46.0</b>	<b>43.6</b>	<b>3.4</b>	<b>5.4</b>	<b>4.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Louisville MMSA	2,336	236,370	100.0	23,647	87.8	66.7	35.9	4.0	22.3	8.2	11.0	
<b>Total</b>	<b>2,336</b>	<b>236,370</b>	<b>100.0</b>	<b>23,647</b>	<b>87.8</b>	<b>66.7</b>	<b>35.9</b>	<b>4.0</b>	<b>22.3</b>	<b>8.2</b>	<b>11.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Louisville MMSA	11	1,14	100.0	129	4.1	0.0	0.0	10.3	0.0	2.3	40.1	54.5	40.3	44.6	45.5	57.4	0.8	0.0	0.0	
<b>Total</b>	<b>11</b>	<b>1,114</b>	<b>100.0</b>	<b>129</b>	<b>4.1</b>	<b>0.0</b>	<b>0.0</b>	<b>10.3</b>	<b>0.0</b>	<b>2.3</b>	<b>40.1</b>	<b>54.5</b>	<b>40.3</b>	<b>44.6</b>	<b>45.5</b>	<b>57.4</b>	<b>0.8</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Louisville MMSA	11	1,114	100.0	129	97.5	63.6	47.3	1.4	27.3	1.1	9.1	
<b>Total</b>	<b>11</b>	<b>1,114</b>	<b>100.0</b>	<b>129</b>	<b>97.5</b>	<b>63.6</b>	<b>47.3</b>	<b>1.4</b>	<b>27.3</b>	<b>1.1</b>	<b>9.1</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
South Bend CSA	2,507	332,416	100.0	33,708	3.4	1.4	2.0	12.6	9.0	10.2	56.1	63.5	57.4	28.0	26.0	30.4	0.0	0.0	0.0	
<b>Total</b>	<b>2,507</b>	<b>332,416</b>	<b>100.0</b>	<b>33,708</b>	<b>3.4</b>	<b>1.4</b>	<b>2.0</b>	<b>12.6</b>	<b>9.0</b>	<b>10.2</b>	<b>56.1</b>	<b>63.5</b>	<b>57.4</b>	<b>28.0</b>	<b>26.0</b>	<b>30.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
South Bend CSA	2,507	332,416	100.0	33,708	21.0	13.5	10.0	17.5	21.0	21.0	21.1	22.3	21.5	40.5	37.9	34.9	0.0	5.3	12.6	
<b>Total</b>	<b>2,507</b>	<b>332,416</b>	<b>100.0</b>	<b>33,708</b>	<b>21.0</b>	<b>13.5</b>	<b>10.0</b>	<b>17.5</b>	<b>21.0</b>	<b>21.0</b>	<b>21.1</b>	<b>22.3</b>	<b>21.5</b>	<b>40.5</b>	<b>37.9</b>	<b>34.9</b>	<b>0.0</b>	<b>5.3</b>	<b>12.6</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
South Bend CSA	958	89,004	100.0	11,007	7.7	6.8	6.5	15.2	10.6	13.1	51.7	58.2	54.5	25.4	24.3	26.0	0.0	0.0	0.0	
<b>Total</b>	<b>958</b>	<b>89,004</b>	<b>100.0</b>	<b>11,007</b>	<b>7.7</b>	<b>6.8</b>	<b>6.5</b>	<b>15.2</b>	<b>10.6</b>	<b>13.1</b>	<b>51.7</b>	<b>58.2</b>	<b>54.5</b>	<b>25.4</b>	<b>24.3</b>	<b>26.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
South Bend CSA	958	89,004	100.0	11,007	84.3	68.8	33.1	5.1	18.0	10.6	13.3		
<b>Total</b>	<b>958</b>	<b>89,004</b>	<b>100.0</b>	<b>11,007</b>	<b>84.3</b>	<b>68.8</b>	<b>33.1</b>	<b>5.1</b>	<b>18.0</b>	<b>10.6</b>	<b>13.3</b>		

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2017-21	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
South Bend CSA	51	6,581	100.0	309	1.7	0.0	0.0	6.9	0.0	2.9	63.1	88.2	58.9	28.2	11.8	38.2	0.0	0.0	0.0		
<b>Total</b>	<b>51</b>	<b>6,581</b>	<b>100.0</b>	<b>309</b>	<b>1.7</b>	<b>0.0</b>	<b>0.0</b>	<b>6.9</b>	<b>0.0</b>	<b>2.9</b>	<b>63.1</b>	<b>88.2</b>	<b>58.9</b>	<b>28.2</b>	<b>11.8</b>	<b>38.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
South Bend CSA	51	6,581	100.0	309	97.1	76.5	53.1	2.3	5.9	0.6	17.6		
<b>Total</b>	<b>51</b>	<b>6,581</b>	<b>100.0</b>	<b>309</b>	<b>97.1</b>	<b>76.5</b>	<b>53.1</b>	<b>2.3</b>	<b>5.9</b>	<b>0.6</b>	<b>17.6</b>		

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.



Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-21		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Tampa MSA	5,225	1,265,398	21.5	177,031	2.1	1.8	2.0	20.2	18.2	16.0	38.2	31.4	35.6	39.4	48.5	46.4	0.1	0.1	0.1		
Cape Coral CSA	5,213	1,431,316	21.5	82,888	2.1	0.6	1.4	17.8	14.0	17.8	43.2	43.2	43.9	36.9	42.2	36.9	0.0	0.0	0.0		
Jacksonville MSA	1,373	373,759	5.7	95,377	3.7	1.2	1.7	19.7	10.4	14.1	38.6	27.4	36.8	37.9	61.0	47.3	0.0	0.0	0.0		
Miami MSA	3,515	1,299,394	14.7	258,889	2.6	1.8	2.1	23.2	18.6	19.1	32.9	29.1	32.4	41.2	50.2	46.0	0.2	0.3	0.4		
North Port CSA	2,897	707,867	11.9	74,796	0.8	0.5	0.3	16.8	8.9	12.9	54.7	53.8	48.9	27.6	37.0	37.8	0.0	0.0	0.0		
Orlando CSA	6,073	1,429,103	25.0	225,948	1.0	0.7	0.7	19.1	16.8	15.1	46.7	41.0	47.9	33.2	41.6	36.3	0.0	0.0	0.0		
<b>Total</b>	<b>24,296</b>	<b>6,506,837</b>	<b>100.0</b>	<b>914,929</b>	<b>2.1</b>	<b>1.1</b>	<b>1.5</b>	<b>20.5</b>	<b>15.5</b>	<b>16.3</b>	<b>39.9</b>	<b>38.5</b>	<b>39.7</b>	<b>37.4</b>	<b>45.0</b>	<b>42.3</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>		

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-21		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Tampa MSA	5,225	1,265,398	21.5	177,031	21.3	10.0	4.4	17.6	17.2	14.6	18.8	17.5	19.9	42.3	47.0	43.0	0.0	8.3	18.2		
Cape Coral CSA	5,213	1,431,316	21.5	82,888	20.8	5.2	3.6	18.2	15.4	14.4	19.5	19.7	19.1	41.5	51.8	47.4	0.0	7.9	15.4		
Jacksonville MSA	1,373	373,759	5.7	95,377	21.9	6.5	4.5	17.1	13.4	13.9	20.0	16.2	19.4	41.0	48.8	39.5	0.0	15.1	22.7		
Miami MSA	3,515	1,299,394	14.5	258,889	23.1	2.6	2.4	17.0	11.0	9.5	17.7	11.9	18.0	42.2	47.9	52.3	0.0	26.6	17.8		
North Port CSA	2,897	707,867	11.9	74,796	19.0	6.8	4.8	19.4	16.0	14.9	21.2	21.4	20.3	40.5	50.2	45.4	0.0	5.7	14.6		
Orlando CSA	6,073	1,429,103	25.0	225,948	21.1	7.7	3.8	18.3	16.5	13.9	19.8	19.7	20.8	40.8	44.8	41.1	0.0	11.4	20.4		
<b>Total</b>	<b>24,296</b>	<b>6,506,837</b>	<b>100.0</b>	<b>914,929</b>	<b>21.8</b>	<b>6.7</b>	<b>3.6</b>	<b>17.7</b>	<b>15.4</b>	<b>12.9</b>	<b>18.9</b>	<b>18.1</b>	<b>19.5</b>	<b>41.6</b>	<b>48.1</b>	<b>45.4</b>	<b>0.0</b>	<b>11.7</b>	<b>18.6</b>		

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Tampa MSA	3,733	258,573	23.6	94,432	4.3	5.1	4.9	19.7	17.9	19.5	33.1	33.5	33.5	42.6	43.2	41.9	0.3	0.3	0.3
Cape Coral CSA	3,449	248,748	21.8	39,652	2.9	2.1	2.6	19.6	15.6	18.1	39.8	40.8	39.9	37.7	41.5	39.4	0.1	0.0	0.0
Jacksonville MSA	848	87,579	5.4	37,931	4.6	4.4	4.3	21.9	20.6	20.7	33.0	37.0	31.3	40.5	38.0	43.6	0.0	0.0	0.0
Miami MSA	1,173	186,866	7.4	312,668	4.1	4.8	4.6	22.2	27.5	22.3	28.3	27.9	27.2	44.1	37.9	44.6	1.2	2.0	1.3
North Port CSA	1,503	124,337	9.5	33,742	1.2	0.9	1.0	19.0	13.8	18.0	47.1	45.9	46.2	32.7	39.3	34.8	0.0	0.0	0.0
Orlando CSA	5,088	358,556	32.2	108,873	2.1	2.2	1.9	24.6	23.6	24.0	39.7	41.9	38.6	33.6	32.4	35.4	0.0	0.0	0.0
<b>Total</b>	<b>15,794</b>	<b>1,264,659</b>	<b>100.0</b>	<b>627,298</b>	<b>3.6</b>	<b>3.0</b>	<b>3.8</b>	<b>22.0</b>	<b>19.7</b>	<b>21.6</b>	<b>33.1</b>	<b>38.7</b>	<b>32.2</b>	<b>40.7</b>	<b>38.3</b>	<b>41.7</b>	<b>0.6</b>	<b>0.2</b>	<b>0.7</b>

*Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Tampa MSA	3,733	258,573	23.6	94,432	92.9	73.3	41.3	2.2	15.2	4.9	11.4
Cape Coral CSA	3,449	248,748	21.8	39,652	93.3	73.8	40.1	2.0	16.1	4.7	10.2
Jacksonville MSA	848	87,579	5.4	37,931	92.2	65.6	38.5	2.2	22.8	5.6	11.7
Miami MSA	1,173	186,866	7.4	312,668	94.4	62.2	39.7	1.9	26.9	3.7	10.8
North Port CSA	1,503	124,337	9.5	33,742	93.1	72.8	43.6	2.1	17.7	4.8	9.5
Orlando CSA	5,088	358,556	32.2	108,873	93.3	71.1	41.7	1.9	16.1	4.9	12.8
<b>Total</b>	<b>15,794</b>	<b>1,264,659</b>	<b>100.0</b>	<b>627,298</b>	<b>93.7</b>	<b>71.4</b>	<b>40.5</b>	<b>2.0</b>	<b>17.2</b>	<b>4.4</b>	<b>11.4</b>

*Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-21		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Tampa MSA	13	595	43.3	187	3.4	7.7	1.6	22.9	7.7	16.6	37.6	30.8	41.2	36.0	53.8	40.6	0.1	0.0	0.0		
Cape Coral CSA	5	111	16.7	114	4.0	20.0	2.6	24.8	0.0	17.5	45.2	40.0	42.1	25.9	40.0	37.7	0.0	0.0	0.0		
Jacksonville MSA	1	13	3.3	89	3.8	0.0	0.0	21.9	0.0	13.5	40.7	0.0	49.4	33.6	100.0	37.1	0.0	0.0	0.0		
Miami MSA	0	0	0.0	605	5.1	0.0	2.1	25.2	0.0	12.2	29.6	0.0	27.9	39.7	0.0	57.4	0.4	0.0	0.3		
North Port CSA	6	508	20.0	101	1.9	0.0	0.0	21.1	16.7	19.8	47.5	33.3	23.8	29.4	50.0	56.4	0.0	0.0	0.0		
Orlando CSA	5	153	16.7	316	1.5	0.0	1.3	22.4	18.2	17.7	47.6	60.0	47.8	28.4	20.0	32.6	0.1	0.0	0.6		
<b>Total</b>	<b>30</b>	<b>1,380</b>	<b>100.0</b>	<b>1,412</b>	<b>3.4</b>	<b>6.7</b>	<b>1.6</b>	<b>23.5</b>	<b>10.0</b>	<b>15.1</b>	<b>39.2</b>	<b>36.7</b>	<b>36.3</b>	<b>33.7</b>	<b>46.7</b>	<b>46.7</b>	<b>0.2</b>	<b>0.0</b>	<b>0.3</b>		

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Tampa MSA	13	595	43.3	187	97.5	84.6	62.6	1.5	0.0	1.1	15.4		
Cape Coral CSA	5	111	16.7	114	97.2	100.0	40.4	1.7	0.0	1.1	0.0		
Jacksonville MSA	1	13	3.3	89	97.9	100.0	49.4	1.2	0.0	1.0	0.0		
Miami MSA	0	0	0.0	605	97.5	0	55.7	1.5	0.0	0.9	0.0		
North Port CSA	6	508	20.0	101	97.4	66.7	56.4	1.4	33.3	1.1	0.0		
Orlando CSA	5	153	16.7	316	97.3	80.0	54.7	1.6	0.0	1.1	20.0		
<b>Total</b>	<b>30</b>	<b>1,380</b>	<b>100.0</b>	<b>1,412</b>	<b>97.5</b>	<b>83.3</b>	<b>54.8</b>	<b>1.5</b>	<b>6.7</b>	<b>1.0</b>	<b>10.0</b>		

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Atlanta MSA	4,559	1,381,376	95.0	244,231	4.2	4.1	4.1	17.3	13.8	13.8	28.8	22.9	27.9	49.7	59.1	52.7	0.0	0.1	0.1	
Augusta MSA	281	38,292	5.8	19,808	7.1	4.6	2.4	15.1	9.6	7.3	35.8	39.1	34.4	42.0	46.6	55.9	0.0	0.0	0.0	
<b>Total</b>	<b>4,840</b>	<b>1,419,668</b>	<b>100.0</b>	<b>264,039</b>	<b>4.4</b>	<b>4.2</b>	<b>4.0</b>	<b>17.1</b>	<b>13.6</b>	<b>14.6</b>	<b>29.4</b>	<b>23.8</b>	<b>28.4</b>	<b>49.0</b>	<b>58.4</b>	<b>53.0</b>	<b>0.0</b>	<b>0.1</b>	<b>0.1</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Atlanta MSA	4,559	1,381,376	94.2	244,231	22.2	6.6	5.2	15.7	13.2	14.4	16.8	13.3	18.4	45.4	44.9	43.6	0.0	22.0	18.4	
Augusta MSA	281	38,292	5.8	19,808	23.4	10.3	3.6	14.7	23.1	12.3	18.1	22.4	18.6	43.8	37.7	34.8	0.0	7.8	30.7	
<b>Total</b>	<b>4,840</b>	<b>1,419,668</b>	<b>100.0</b>	<b>264,039</b>	<b>22.3</b>	<b>6.9</b>	<b>5.1</b>	<b>15.6</b>	<b>13.7</b>	<b>14.2</b>	<b>16.9</b>	<b>13.8</b>	<b>18.5</b>	<b>45.2</b>	<b>44.5</b>	<b>42.9</b>	<b>0.0</b>	<b>21.1</b>	<b>19.3</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Atlanta MSA	1,879	236,363	95.1	142,807	7.0	5.3	5.6	21.3	23.4	18.5	25.6	22.0	24.6	45.6	49.1	51.0	0.5	0.2	0.4	
Augusta MSA	96	8,462	4.9	7,362	9.9	12.5	9.1	16.5	30.2	12.8	29.5	26.0	28.3	44.1	31.3	49.8	0.0	0.0	0.0	
<b>Total</b>	<b>1,975</b>	<b>244,825</b>	<b>100.0</b>	<b>150,169</b>	<b>7.1</b>	<b>5.6</b>	<b>5.7</b>	<b>21.1</b>	<b>23.7</b>	<b>18.2</b>	<b>25.8</b>	<b>22.2</b>	<b>24.8</b>	<b>45.5</b>	<b>48.3</b>	<b>50.9</b>	<b>0.5</b>	<b>0.2</b>	<b>0.4</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Atlanta MSA	1,879	236,363	95.1	142,807	93.0	63.9	42.6	2.3	24.1	4.8	12.0
Augusta MSA	96	8,462	4.9	7,362	89.5	71.9	33.7	2.6	17.7	7.8	10.4
<b>Total</b>	<b>1,975</b>	<b>244,825</b>	<b>100.0</b>	<b>150,169</b>	<b>92.8</b>	<b>64.3</b>	<b>42.1</b>	<b>2.3</b>	<b>23.8</b>	<b>4.9</b>	<b>11.9</b>

*Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Atlanta MSA	1	9	100.0	170	5.8	0.0	2.4	20.8	0.0	14.1	31.1	0.0	40.0	42.0	100.0	43.5	0.1	0.0	0.0
Augusta MSA	0	0	0.0	22	8.0	0.0	4.5	13.2	0.0	0.0	34.8	0.0	50.0	44.0	0.0	45.5	0.0	0.0	0.0
<b>Total</b>	<b>1</b>	<b>9</b>	<b>100.0</b>	<b>192</b>	<b>6.0</b>	<b>0.0</b>	<b>2.6</b>	<b>20.3</b>	<b>0.0</b>	<b>12.5</b>	<b>31.4</b>	<b>0.0</b>	<b>41.1</b>	<b>42.2</b>	<b>100.0</b>	<b>43.8</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*

Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Atlanta MSA	1	9	100.0	170	96.6	100.0	61.2	1.7	0.0	1.6	0.0
Augusta MSA	0	0	0.0	22	98.5	0.0	27.3	1.1	0.0	0.5	0.0
<b>Total</b>	<b>1</b>	<b>9</b>	<b>100.0</b>	<b>192</b>	<b>96.8</b>	<b>100.0</b>	<b>57.3</b>	<b>1.7</b>	<b>0.0</b>	<b>1.5</b>	<b>0.0</b>

*Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
IL Non-MSA	422	38,816	47.4	3,563	0.5	0.8	0.1	12.8	4.5	10.2	60.7	49.5	61.1	26.1	45.7	28.6	0.0	0.0	0.0	
Carbondale MSA	138	12,553	15.5	2,293	0.0	0.0	0.0	15.4	14.5	12.4	53.8	50.0	51.1	30.8	35.5	36.5	0.0	0.0	0.0	
Rockford CSA	331	29,449	37.1	13,257	5.7	2.7	2.9	16.7	11.8	13.0	36.2	52.6	35.3	41.3	32.9	48.7	0.0	0.0	0.1	
<b>Total</b>	<b>891</b>	<b>80,818</b>	<b>100.0</b>	<b>19,113</b>	<b>3.6</b>	<b>1.1</b>	<b>2.1</b>	<b>15.5</b>	<b>8.8</b>	<b>12.4</b>	<b>45.0</b>	<b>50.7</b>	<b>42.0</b>	<b>35.9</b>	<b>39.4</b>	<b>43.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
IL Non-MSA	422	38,816	47.4	3,563	18.4	13.7	8.2	18.4	24.6	19.1	22.5	27.0	20.7	40.7	31.3	31.0	0.0	3.3	21.1	
Carbondale MSA	138	12,553	15.5	2,293	18.9	10.1	6.9	20.1	29.0	15.4	19.0	26.8	20.0	42.1	26.8	37.7	0.0	7.2	19.9	
Rockford CSA	331	29,449	37.1	13,257	22.8	14.5	11.0	17.2	21.1	20.3	20.4	24.8	22.0	39.6	34.1	27.0	0.0	5.4	19.6	
<b>Total</b>	<b>891</b>	<b>80,818</b>	<b>100.0</b>	<b>19,113</b>	<b>21.2</b>	<b>13.5</b>	<b>10.0</b>	<b>17.9</b>	<b>24.0</b>	<b>19.5</b>	<b>20.7</b>	<b>26.2</b>	<b>21.6</b>	<b>40.2</b>	<b>31.7</b>	<b>29.0</b>	<b>0.0</b>	<b>4.7</b>	<b>19.9</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
IL Non-MSA	138	16,094	41.4	1,379	4.4	5.8	3.5	9.6	7.2	9.1	56.1	39.9	58.8	29.8	47.1	28.6	0.0	0.0	0.0
Carbondale MSA	16	3,094	4.8	1,056	0.0	0.0	0.0	15.5	12.5	11.6	59.6	81.3	56.2	24.9	6.3	32.2	0.0	0.0	0.0
Rockford CSA	179	17,450	53.8	5,255	11.3	16.8	9.7	16.4	19.6	17.1	30.6	34.6	28.7	39.5	29.1	41.5	2.2	0.0	2.9
<b>Total</b>	<b>333</b>	<b>36,638</b>	<b>100.0</b>	<b>7,690</b>	<b>8.1</b>	<b>11.4</b>	<b>7.2</b>	<b>14.5</b>	<b>14.1</b>	<b>15.0</b>	<b>40.9</b>	<b>39.0</b>	<b>37.9</b>	<b>35.1</b>	<b>35.4</b>	<b>37.9</b>	<b>1.4</b>	<b>0.0</b>	<b>2.0</b>

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
IL Non-MSA	138	16,094	41.4	1,379	78.1	54.3	39.7	5.9	29.7	16.0	15.9	
Carbondale MSA	16	3,094	4.8	1,056	81.3	43.8	43.3	5.0	0.0	13.7	56.3	
Rockford CSA	179	17,450	53.8	5,255	82.3	65.4	35.2	5.9	21.2	11.7	13.4	
<b>Total</b>	<b>333</b>	<b>36,638</b>	<b>100.0</b>	<b>7,690</b>	<b>81.1</b>	<b>59.8</b>	<b>37.1</b>	<b>5.8</b>	<b>23.7</b>	<b>13.1</b>	<b>16.5</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
IL Non-MSA	27	1,570	93.1	236	0.4	0.0	0.0	3.5	0.0	4.7	63.7	22.2	77.1	32.5	77.8	18.2	0.0	0.0	0.0	
Carbondale MSA	2	24	6.9	51	0.0	0.0	0.0	8.4	0.0	0.0	48.8	100.0	68.6	42.8	0.0	31.4	0.0	0.0	0.0	
Rockford CSA	0	0	0.0	157	4.1	0.0	0.6	10.4	0.0	1.3	45.8	0.0	55.4	39.1	0.0	42.7	0.6	0.0	0.0	
<b>Total</b>	<b>29</b>	<b>1,594</b>	<b>100.0</b>	<b>444</b>	<b>2.3</b>	<b>0.0</b>	<b>0.2</b>	<b>7.5</b>	<b>0.0</b>	<b>2.9</b>	<b>53.0</b>	<b>27.6</b>	<b>68.5</b>	<b>36.8</b>	<b>72.4</b>	<b>28.4</b>	<b>0.3</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
IL Non-MSA	27	1,570	93.1	236	98.1	59.3	61.0	1.1	0.0	0.8	40.7	
Carbondale MSA	2	24	6.9	51	94.6	50.0	58.8	1.2	0.0	4.2	50.0	
Rockford CSA	0	0	0.0	157	96.3	0.0	50.3	2.5	0.0	1.2	0.0	
<b>Total</b>	<b>29</b>	<b>1,594</b>	<b>100.0</b>	<b>444</b>	<b>96.8</b>	<b>58.6</b>	<b>57.0</b>	<b>1.8</b>	<b>0.0</b>	<b>1.3</b>	<b>41.4</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.



**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** 2017-21

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Indianapolis CSA	11,997	1,962,265	59.8	130,471	6.2	5.4	4.7	16.5	15.5	13.9	35.0	33.1	32.0	42.3	46.0	49.3	0.1	0.1	0.0
Bloomington MSA	575	91,097	2.9	6,604	3.1	1.0	2.4	7.6	9.2	8.8	44.8	47.3	46.2	44.4	42.3	42.7	0.0	0.2	0.0
Fort Wayne CSA	3,277	501,850	16.3	25,302	5.6	1.8	2.0	12.5	10.0	11.5	51.2	43.0	46.4	30.6	45.2	40.0	0.1	0.2	0.1
Lafayette MSA	355	47,992	1.8	8,969	1.1	0.3	1.0	16.2	8.7	14.2	35.3	38.6	33.6	47.3	52.4	51.0	0.1	0.0	0.2
Terre Haute MSA	1,499	122,883	7.5	6,248	2.4	1.5	1.6	13.8	11.7	12.8	52.3	56.8	51.0	31.5	30.0	34.7	0.0	0.0	0.0
IN Non-MSA	2,350	236,129	11.7	8,125	0.0	0.0	0.0	7.9	6.4	7.5	63.3	57.4	61.6	28.8	36.2	30.9	0.0	0.0	0.0
<b>Total</b>	<b>20,053</b>	<b>2,962,216</b>	<b>100.0</b>	<b>185,719</b>	<b>4.9</b>	<b>3.7</b>	<b>3.8</b>	<b>14.6</b>	<b>12.9</b>	<b>13.1</b>	<b>41.5</b>	<b>39.8</b>	<b>36.5</b>	<b>38.9</b>	<b>43.5</b>	<b>46.6</b>	<b>0.1</b>	<b>0.1</b>	<b>0.0</b>

*Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** 2017-21

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Indianapolis CSA	11,997	1,962,265	59.8	130,471	21.8	15.4	8.2	17.0	21.3	18.9	19.5	19.9	20.7	41.8	34.2	34.4	0.0	9.2	17.9
Bloomington MSA	575	91,097	2.9	6,604	22.2	9.4	5.9	15.8	21.7	16.0	19.5	22.6	21.3	42.5	39.1	41.1	0.0	7.1	15.7
Fort Wayne CSA	3,277	501,850	16.3	25,302	19.9	10.1	8.7	18.1	22.6	21.4	22.2	23.5	20.9	39.8	41.0	33.3	0.0	2.8	15.7
Lafayette MSA	355	47,992	1.8	8,969	20.5	12.1	8.3	15.7	18.6	19.3	23.0	23.7	22.0	40.8	41.1	34.7	0.0	4.5	15.6
Terre Haute MSA	1,499	122,883	7.5	6,248	21.2	12.1	6.9	18.2	24.5	18.9	20.5	26.6	21.5	40.0	34.0	35.2	0.0	2.9	17.5
IN Non-MSA	2,350	236,129	11.7	8,125	17.2	10.7	8.4	17.9	25.0	20.8	22.5	26.8	22.3	42.5	34.9	29.7	0.0	2.7	18.8
<b>Total</b>	<b>20,053</b>	<b>2,962,216</b>	<b>100.0</b>	<b>185,719</b>	<b>21.1</b>	<b>13.5</b>	<b>8.1</b>	<b>17.2</b>	<b>22.1</b>	<b>19.2</b>	<b>20.4</b>	<b>21.9</b>	<b>20.9</b>	<b>41.4</b>	<b>35.7</b>	<b>34.3</b>	<b>0.0</b>	<b>6.8</b>	<b>17.5</b>

*Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Indianapolis CSA	3,638	399,409	72.7	40,489	10.9	6.4	7.7	20.8	16.9	17.2	29.7	32.0	30.5	38.5	44.5	44.4	0.1	0.2	0.2	
Bloomington MSA	187	17,076	3.7	2,443	6.0	8.0	5.9	20.5	23.0	22.0	34.0	33.7	35.9	38.0	35.3	36.1	1.5	0.0	0.2	
Fort Wayne CSA	448	36,252	8.9	8,000	7.3	7.4	6.5	16.7	16.5	16.5	42.4	45.5	43.0	29.8	27.0	29.3	3.8	3.6	4.8	
Lafayette MSA	99	7,407	2.0	2,584	4.2	3.0	3.6	28.3	32.3	33.6	27.5	19.2	26.4	36.1	44.4	33.9	3.9	1.0	2.5	
Terre Haute MSA	218	12,152	4.4	2,763	5.6	3.7	8.5	19.1	20.2	17.4	45.4	48.2	46.1	30.0	28.0	28.0	0.0	0.0	0.0	
IN Non-MSA	417	36,336	8.3	3,279	0.0	0.0	0.0	10.2	4.3	8.2	60.5	63.8	58.4	29.3	31.9	33.4	0.0	0.0	0.0	
<b>Total</b>	<b>5,007</b>	<b>508,632</b>	<b>100.0</b>	<b>59,558</b>	<b>9.2</b>	<b>5.9</b>	<b>6.9</b>	<b>20.0</b>	<b>16.5</b>	<b>17.5</b>	<b>33.6</b>	<b>36.3</b>	<b>34.5</b>	<b>36.5</b>	<b>40.8</b>	<b>40.2</b>	<b>0.8</b>	<b>0.5</b>	<b>0.9</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Indianapolis CSA	3,638	399,409	72.7	40,489	89.1	64.2	36.4	3.5	24.2	7.4	11.6	
Bloomington MSA	187	17,076	3.7	2,443	87.1	70.1	25.5	3.6	21.4	9.2	8.6	
Fort Wayne CSA	448	36,252	8.9	8,000	85.7	71.4	35.8	4.5	19.0	9.8	9.6	
Lafayette MSA	99	7,407	2.0	2,584	86.1	75.8	37.7	3.5	18.2	10.4	6.1	
Terre Haute MSA	218	12,152	4.4	2,763	81.9	78.9	34.5	4.5	9.6	13.6	11.5	
IN Non-MSA	417	36,336	8.3	3,279	82.8	68.6	31.4	4.6	18.7	12.6	12.7	
<b>Total</b>	<b>5,007</b>	<b>508,632</b>	<b>100.0</b>	<b>59,558</b>	<b>87.8</b>	<b>66.3</b>	<b>35.6</b>	<b>3.7</b>	<b>22.4</b>	<b>8.4</b>	<b>11.3</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Indianapolis CSA	36	1,390	40.0	541	6.1	0.0	1.1	14.7	2.8	6.1	40.2	72.2	57.9	38.9	25.0	34.9	0.1	0.0	0.0
Bloomington MSA	2	40	2.2	24	2.2	0.0	8.3	5.5	0.0	12.5	50.5	0.0	50.0	41.5	100.0	29.2	0.3	0.0	0.0
Fort Wayne CSA	3	48	3.3	377	2.7	0.0	0.5	7.5	0.0	0.5	63.9	66.7	82.5	25.2	33.3	16.4	0.8	0.0	0.0
Lafayette MSA	0	0	0.0	95	1.8	0.0	0.0	13.3	0.0	3.2	35.9	0.0	54.7	49.0	0.0	42.1	0.0	0.0	0.0
Terre Haute MSA	18	458	20.0	419	1.3	0.0	0.0	8.3	0.0	3.6	56.7	72.2	53.2	33.7	27.8	43.2	0.0	0.0	0.0
IN Non-MSA	31	1,445	34.4	580	0.0	0.0	0.0	2.4	0.0	1.0	56.7	74.2	56.6	40.9	25.8	42.4	0.0	0.0	0.0
<b>Total</b>	<b>90</b>	<b>3,381</b>	<b>100.0</b>	<b>2,036</b>	<b>4.0</b>	<b>0.0</b>	<b>0.5</b>	<b>10.9</b>	<b>1.1</b>	<b>3.0</b>	<b>47.4</b>	<b>71.1</b>	<b>60.9</b>	<b>37.5</b>	<b>27.8</b>	<b>35.6</b>	<b>0.2</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Indianapolis CSA	36	1,390	40.0	541	97.0	75.0	58.4	1.6	2.8	1.3	22.2	
Bloomington MSA	2	40	2.2	24	97.0	100.0	54.2	2.5	0.0	0.5	0.0	
Fort Wayne CSA	3	48	3.3	377	97.5	100.0	65.0	1.5	0.0	1.0	0.0	
Lafayette MSA	0	0	0.0	95	96.9	0.0	45.3	1.6	0.0	1.5	0.0	
Terre Haute MSA	18	458	20.0	419	98.0	77.8	68.0	0.8	11.1	1.2	11.1	
IN Non-MSA	31	1,445	34.4	580	97.9	54.8	62.1	1.2	0.0	1.0	45.2	
<b>Total</b>	<b>90</b>	<b>3,381</b>	<b>100.0</b>	<b>2,036</b>	<b>97.3</b>	<b>70.0</b>	<b>62.0</b>	<b>1.5</b>	<b>3.3</b>	<b>1.2</b>	<b>26.7</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Lexington CSA	4,056	692,721	74.1	33,178	3.3	2.9	2.4	15.6	14.7	14.9	37.5	34.5	35.9	43.6	47.9	46.8	0.0	0.0	0.0	
Owensboro MSA	411	41,669	7.5	4,902	1.8	2.9	1.0	18.1	17.5	16.3	50.9	54.0	51.4	29.2	25.5	31.2	0.0	0.0	0.0	
KY Non-MSA	1,005	97,874	18.4	3,944	0.0	0.0	0.0	2.0	2.4	1.8	55.3	51.7	47.8	42.6	45.9	50.4	0.0	0.0	0.0	
<b>Total</b>	<b>5,472</b>	<b>832,264</b>	<b>100.0</b>	<b>42,024</b>	<b>2.5</b>	<b>2.4</b>	<b>2.1</b>	<b>13.7</b>	<b>12.6</b>	<b>13.8</b>	<b>42.4</b>	<b>39.2</b>	<b>38.8</b>	<b>41.4</b>	<b>45.8</b>	<b>45.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Lexington CSA	4,056	692,721	74.1	33,178	22.0	8.6	5.7	15.0	19.8	16.5	18.7	21.3	20.3	44.3	46.9	40.0	0.0	3.4	17.6	
Owensboro MSA	411	41,669	7.6	4,902	21.8	14.6	7.4	17.7	28.0	19.0	19.7	24.3	22.6	40.8	31.1	34.8	0.0	2.2	16.2	
KY Non-MSA	1,005	97,874	18.4	3,944	19.0	4.6	3.0	13.8	16.2	12.7	18.2	25.2	21.8	48.9	51.5	43.2	0.0	2.5	19.3	
<b>Total</b>	<b>5,472</b>	<b>832,264</b>	<b>100.0</b>	<b>42,024</b>	<b>21.5</b>	<b>8.3</b>	<b>5.6</b>	<b>15.2</b>	<b>19.8</b>	<b>16.4</b>	<b>18.7</b>	<b>22.2</b>	<b>20.7</b>	<b>44.6</b>	<b>46.6</b>	<b>39.7</b>	<b>0.0</b>	<b>3.1</b>	<b>17.6</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Lexington CSA	1,222	116,427	78.3	13,191	4.9	4.3	5.2	17.7	14.4	17.4	39.3	38.2	39.8	38.1	43.1	37.6	0.0	0.0	0.0	
Owensboro MSA	75	4,726	4.8	1,984	2.8	0.0	2.8	28.7	24.0	27.4	41.0	50.7	40.3	27.5	25.3	29.4	0.0	0.0	0.0	
KY Non-MSA	264	9,563	16.9	1,361	0.0	0.0	0.0	4.6	2.7	4.6	50.6	57.2	47.0	44.8	40.2	48.5	0.0	0.0	0.0	
<b>Total</b>	<b>1,561</b>	<b>130,716</b>	<b>100.0</b>	<b>16,536</b>	<b>4.2</b>	<b>3.3</b>	<b>4.5</b>	<b>17.6</b>	<b>12.9</b>	<b>17.6</b>	<b>40.6</b>	<b>42.0</b>	<b>40.5</b>	<b>37.7</b>	<b>41.8</b>	<b>37.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Lexington CSA	1,222	116,427	78.3	13,191	86.8	70.5	39.8	3.5	20.0	9.7	9.6	
Owensboro MSA	75	4,726	4.8	1,984	83.7	66.7	40.9	4.7	14.7	11.7	18.7	
KY Non-MSA	264	9,563	16.9	1,361	83.0	81.1	41.3	3.8	6.8	13.2	12.1	
<b>Total</b>	<b>1,561</b>	<b>130,716</b>	<b>100.0</b>	<b>16,536</b>	<b>86.1</b>	<b>72.1</b>	<b>40.1</b>	<b>3.7</b>	<b>17.5</b>	<b>10.2</b>	<b>10.4</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Lexington CSA	38	3,686	35.2	312	3.3	0.0	1.3	12.5	10.5	8.7	42.1	57.9	41.3	42.1	31.6	48.7	0.0	0.0	0.0
Owensboro MSA	1	1	0.9	259	0.2	0.0	0.0	11.3	0.0	2.7	51.1	100.0	54.4	37.4	0.0	42.9	0.0	0.0	0.0
KY Non-MSA	69	8,194	63.9	217	0.0	0.0	0.0	1.1	0.0	0.5	58.3	79.7	56.2	40.6	20.3	43.3	0.0	0.0	0.0
<b>Total</b>	<b>108</b>	<b>11,881</b>	<b>100.0</b>	<b>788</b>	<b>2.3</b>	<b>0.0</b>	<b>0.5</b>	<b>10.5</b>	<b>3.7</b>	<b>4.4</b>	<b>45.9</b>	<b>72.2</b>	<b>49.7</b>	<b>41.2</b>	<b>24.1</b>	<b>45.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Lexington CSA	38	3,686	35.2	312	96.6	71.1	56.4	2.0	28.9	1.4	0.0	
Owensboro MSA	1	1	0.9	259	98.4	100.0	64.9	1.1	0.0	0.5	0.0	
KY Non-MSA	69	8,194	63.9	217	98.5	66.7	51.2	0.7	14.5	0.8	18.8	
<b>Total</b>	<b>108</b>	<b>11,881</b>	<b>100.0</b>	<b>788</b>	<b>97.2</b>	<b>68.5</b>	<b>57.7</b>	<b>1.7</b>	<b>19.4</b>	<b>1.2</b>	<b>12.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Detroit CSA	16,559	2,626,942	33.2	272,170	6.1	3.9	2.5	18.5	16.3	13.3	38.6	39.6	39.6	36.6	40.2	44.5	0.1	0.0	0.1
Grand Rapids CSA	19,987	2,787,714	40.1	79,822	2.1	2.1	1.8	15.1	13.9	14.3	53.0	51.0	51.1	29.9	32.9	32.8	0.0	0.0	0.0
Jackson MSA	555	62,889	1.1	7,462	5.7	4.9	3.2	15.6	14.6	14.9	53.7	53.5	53.1	25.0	27.0	28.7	0.0	0.0	0.0
Kalamazoo CSA	3,523	494,771	7.1	21,598	4.3	2.6	2.6	15.0	15.2	13.5	51.2	39.4	49.2	29.5	42.7	34.6	0.0	0.1	0.1
Lansing MSA	3,843	461,292	7.7	24,799	2.5	1.3	2.3	16.5	13.5	15.1	50.8	49.4	48.6	30.1	35.6	34.0	0.1	0.2	0.1
Saginaw CSA	653	73,820	1.3	14,583	4.4	1.4	1.3	14.4	12.3	11.1	51.3	47.6	50.9	30.0	38.7	36.8	0.0	0.0	0.0
MI Non-MSA	4,754	703,300	9.5	24,435	0.0	0.0	0.0	6.3	5.6	4.9	70.4	64.3	66.3	23.3	30.0	28.8	0.0	0.1	0.0
<b>Total</b>	<b>49,874</b>	<b>7,210,728</b>	<b>100.0</b>	<b>444,869</b>	<b>4.7</b>	<b>2.5</b>	<b>2.2</b>	<b>16.6</b>	<b>14.0</b>	<b>13.1</b>	<b>45.3</b>	<b>47.5</b>	<b>44.7</b>	<b>33.3</b>	<b>36.0</b>	<b>39.9</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Detroit CSA	16,559	2,626,942	33.2	272,170	22.8	15.3	9.5	16.5	21.4	19.8	19.1	22.0	23.2	41.6	36.1	34.7	0.0	5.1	12.7
Grand Rapids CSA	19,987	2,787,714	40.1	79,822	19.5	13.4	8.1	17.6	23.4	21.4	22.0	23.8	23.4	40.8	33.9	35.2	0.0	5.5	11.9
Jackson MSA	555	62,889	1.1	7,462	22.3	8.6	6.7	17.5	19.8	19.2	20.2	29.4	23.4	40.0	36.9	35.8	0.0	5.2	14.9
Kalamazoo CSA	3,523	494,771	7.1	21,598	20.6	12.7	8.9	17.3	26.9	21.0	20.5	24.2	23.6	41.5	32.8	35.2	0.0	3.4	11.2
Lansing MSA	3,843	461,292	7.7	24,799	21.0	12.5	9.7	17.3	25.8	22.9	20.7	26.1	23.9	41.0	33.3	31.3	0.0	2.4	12.3
Saginaw CSA	653	73,820	1.3	14,583	20.5	11.2	9.1	17.5	21.4	20.1	21.1	23.6	23.0	40.9	39.1	35.8	0.0	4.7	12.0
MI Non-MSA	4,754	703,300	9.5	24,435	19.0	8.5	5.1	17.5	19.4	15.9	21.9	23.9	20.8	41.5	44.8	47.2	0.0	3.4	11.1
<b>Total</b>	<b>49,874</b>	<b>7,210,728</b>	<b>100.0</b>	<b>444,869</b>	<b>21.7</b>	<b>13.4</b>	<b>8.9</b>	<b>16.9</b>	<b>22.7</b>	<b>20.1</b>	<b>20.0</b>	<b>23.5</b>	<b>23.2</b>	<b>41.3</b>	<b>35.7</b>	<b>35.4</b>	<b>0.0</b>	<b>4.8</b>	<b>12.4</b>

*Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*



Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Detroit CSA	9,370	1,248,408	46.6	115,446	8.0	5.6	7.1	19.4	19.9	19.0	32.8	35.8	32.4	38.8	37.8	40.6	0.9	1.0	0.9	
Grand Rapids CSA	5,926	738,912	29.5	25,563	3.5	4.1	3.6	16.2	13.3	16.3	47.2	45.6	47.2	33.1	36.9	32.9	0.0	0.0	0.0	
Jackson MSA	234	37,092	1.2	1,876	8.9	6.4	10.1	27.3	38.0	28.6	42.4	35.0	38.9	21.3	20.5	22.5	0.1	0.0	0.0	
Kalamazoo CSA	1,080	142,720	5.4	6,016	7.3	6.8	7.3	21.8	24.6	22.5	44.1	39.4	42.7	26.4	29.1	27.4	0.3	0.1	0.1	
Lansing MSA	1,299	150,046	6.5	7,169	6.6	7.2	7.4	19.8	15.5	19.3	39.5	40.3	37.6	31.7	36.0	34.6	2.4	1.0	1.1	
Saginaw CSA	377	55,834	1.9	4,959	5.2	3.7	4.7	18.1	20.4	17.0	44.7	46.2	44.0	32.0	29.7	34.3	0.0	0.0	0.0	
MI Non-MSA	1,801	211,326	9.0	9,846	0.7	0.3	0.6	8.6	7.5	7.1	62.7	66.4	63.8	28.0	25.8	28.5	0.0	0.0	0.0	
<b>Total</b>	<b>20,087</b>	<b>2,584,338</b>	<b>100.0</b>	<b>170,875</b>	<b>6.7</b>	<b>4.8</b>	<b>6.2</b>	<b>18.5</b>	<b>17.1</b>	<b>18.1</b>	<b>38.1</b>	<b>42.1</b>	<b>37.4</b>	<b>35.9</b>	<b>35.5</b>	<b>37.7</b>	<b>0.8</b>	<b>0.5</b>	<b>0.7</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Detroit CSA	9,370	1,248,408	46.6	115,446	86.9	58.6	41.5	4.9	30.0	8.2	11.3	
Grand Rapids CSA	5,926	738,912	29.5	25,563	83.7	59.9	36.1	6.2	27.1	10.1	12.9	
Jackson MSA	234	37,092	1.2	1,876	82.4	50.9	42.0	6.3	38.0	11.4	11.1	
Kalamazoo CSA	1,080	142,720	5.4	6,016	81.6	56.3	36.0	6.0	32.2	12.4	11.5	
Lansing MSA	1,299	150,046	6.5	7,169	83.1	59.6	41.9	4.9	29.4	12.0	11.0	
Saginaw CSA	377	55,834	1.9	4,959	80.5	52.5	36.4	5.8	31.0	13.7	16.4	
MI Non-MSA	1,801	211,326	9.0	9,846	83.9	61.9	38.9	5.0	23.6	11.2	14.5	
<b>Total</b>	<b>20,087</b>	<b>2,584,338</b>	<b>100.0</b>	<b>170,875</b>	<b>85.6</b>	<b>59.0</b>	<b>40.2</b>	<b>5.2</b>	<b>28.8</b>	<b>9.3</b>	<b>12.2</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Detroit CSA	25	461	21.4	720	4.7	4.0	2.6	14.9	16.0	11.7	45.8	40.0	53.2	34.4	40.0	32.4	0.3	0.0	0.1
Grand Rapids CSA	32	1,060	27.4	530	1.2	0.0	0.6	11.3	0.0	11.5	56.3	65.6	59.2	31.3	34.4	28.7	0.0	0.0	0.0
Jackson MSA	5	73	4.3	56	1.6	0.0	0.0	8.9	0.0	10.7	66.1	100.0	64.3	23.5	0.0	25.0	0.0	0.0	0.0
Kalamazoo CSA	4	105	3.4	166	2.4	0.0	0.0	10.3	0.0	3.6	62.8	66.7	77.1	24.3	66.7	19.3	0.1	0.0	0.0
Lansing MSA	15	191	12.8	183	2.0	0.0	0.5	7.8	0.0	3.8	62.0	53.3	72.1	27.6	46.7	23.5	0.7	0.0	0.0
Saginaw CSA	0	0	0.0	175	0.8	0.0	0.0	7.5	0.0	2.9	58.7	0.0	64.0	33.0	0.0	33.1	0.0	0.0	0.0
MI Non-MSA	36	3,508	30.8	432	0.0	0.0	0.2	3.9	8.3	2.8	75.4	77.8	82.9	20.6	13.9	14.1	0.0	0.0	0.0
<b>Total</b>	<b>117</b>	<b>5,398</b>	<b>100.0</b>	<b>2,262</b>	<b>2.8</b>	<b>0.9</b>	<b>1.1</b>	<b>11.4</b>	<b>6.0</b>	<b>8.0</b>	<b>55.1</b>	<b>63.2</b>	<b>64.7</b>	<b>30.5</b>	<b>29.9</b>	<b>26.2</b>	<b>0.2</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-21	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Detroit CSA	25	461	21.4	720	96.0	92.0	53.9	2.4	4.0	1.6	4.0	
Grand Rapids CSA	32	1,060	27.4	530	94.5	71.9	35.7	4.1	9.4	1.4	18.8	
Jackson MSA	5	73	4.3	56	98.4	100.0	25.0	0.9	0.0	0.7	0.0	
Kalamazoo CSA	4	105	3.4	166	94.4	75.0	33.7	3.6	0.0	2.0	25.0	
Lansing MSA	15	191	12.8	183	96.5	73.3	26.8	2.0	0.0	1.5	26.7	
Saginaw CSA	0	0	0.0	175	97.4	0.0	45.1	1.5	0.0	1.1	0.0	
MI Non-MSA	36	3,508	30.8	432	96.1	77.8	42.4	2.7	22.2	1.2	0.0	
<b>Total</b>	<b>117</b>	<b>5,398</b>	<b>100.0</b>	<b>2,262</b>	<b>95.8</b>	<b>79.5</b>	<b>42.4</b>	<b>2.7</b>	<b>10.3</b>	<b>1.5</b>	<b>10.3</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Charlotte CSA	8,648	1,685,523	75.4	144,508	2.8	2.4	2.5	17.8	17.1	14.2	37.9	33.9	32.1	41.5	46.6	51.1	0.0	0.1	0.1	
Asheville CSA	600	104,449	5.2	19,543	0.6	0.7	0.7	7.7	3.3	8.4	70.4	75.3	66.7	21.3	21.0	24.3	0.0	0.0	0.0	
Hickory MSA	258	47,753	2.2	8,178	0.0	0.0	0.0	8.5	3.5	7.3	64.2	45.7	56.3	27.2	50.8	36.4	0.0	0.0	0.0	
Raleigh CSA	1,614	488,856	14.1	118,494	2.3	0.9	2.4	17.2	10.7	15.2	34.6	32.3	33.4	45.8	56.1	48.9	0.0	0.0	0.0	
NC Non-MSA	351	47,268	3.1	5,865	0.0	0.0	0.0	17.0	15.4	12.1	74.8	72.9	72.6	8.3	11.7	15.3	0.0	0.0	0.0	
<b>Total</b>	<b>11,471</b>	<b>2,373,848</b>	<b>100.0</b>	<b>296,588</b>	<b>2.2</b>	<b>2.0</b>	<b>2.2</b>	<b>16.2</b>	<b>15.1</b>	<b>14.0</b>	<b>42.3</b>	<b>37.3</b>	<b>36.4</b>	<b>39.2</b>	<b>45.6</b>	<b>47.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Charlotte CSA	8,648	1,685,523	75.4	144,508	21.6	12.8	4.4	16.5	19.2	13.9	18.7	18.6	18.8	43.2	41.1	47.4	0.0	8.3	15.4	
Asheville CSA	600	104,449	5.2	19,543	19.4	5.7	4.7	18.8	19.5	15.2	20.4	23.0	20.5	41.4	45.5	46.6	0.0	6.3	13.0	
Hickory MSA	258	47,753	2.2	8,178	18.1	5.0	4.6	17.8	16.7	16.5	20.4	19.4	19.4	43.8	52.3	43.7	0.0	6.6	15.9	
Raleigh CSA	1,614	488,856	14.1	118,494	20.7	4.6	5.1	16.1	14.1	14.8	18.3	13.4	20.1	44.9	52.4	46.0	0.0	15.5	13.9	
NC Non-MSA	351	47,268	3.1	5,865	22.3	8.8	2.9	20.2	21.7	12.4	21.5	20.2	17.2	36.1	44.2	55.7	0.0	5.1	11.9	
<b>Total</b>	<b>11,471</b>	<b>2,373,848</b>	<b>100.0</b>	<b>296,588</b>	<b>21.0</b>	<b>11.0</b>	<b>4.7</b>	<b>16.8</b>	<b>18.5</b>	<b>14.4</b>	<b>18.9</b>	<b>18.2</b>	<b>19.4</b>	<b>43.4</b>	<b>43.3</b>	<b>46.9</b>	<b>0.0</b>	<b>9.1</b>	<b>14.6</b>	

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Charlotte CSA	4,698	392,292	79.4	59,427	6.4	7.0	6.5	17.5	17.2	16.5	29.2	30.8	29.1	46.3	44.4	47.3	0.7	0.5	0.6	
Asheville CSA	246	19,694	4.2	10,465	2.9	0.8	2.8	11.3	6.9	12.6	55.7	78.0	54.5	30.1	14.2	30.1	0.0	0.0	0.0	
Hickory MSA	78	5,020	1.3	3,417	0.0	0.0	0.0	18.1	12.8	21.4	46.7	41.0	42.2	35.2	46.2	36.4	0.0	0.0	0.0	
Raleigh CSA	716	81,169	12.1	45,867	4.6	5.7	4.4	18.8	20.5	18.0	31.8	30.7	32.0	44.2	43.0	45.2	0.6	0.0	0.4	
NC Non-MSA	176	6,135	3.0	2,185	0.0	0.0	0.0	19.7	9.1	19.2	70.3	89.2	73.2	10.0	1.7	7.6	0.0	0.0	0.0	
<b>Total</b>	<b>5,914</b>	<b>504,310</b>	<b>100.0</b>	<b>121,361</b>	<b>5.1</b>	<b>6.3</b>	<b>5.1</b>	<b>17.5</b>	<b>16.9</b>	<b>16.9</b>	<b>33.6</b>	<b>34.7</b>	<b>33.6</b>	<b>43.2</b>	<b>41.7</b>	<b>44.0</b>	<b>0.5</b>	<b>0.4</b>	<b>0.5</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Charlotte CSA	4,698	392,292	79.4	59,427	88.9	70.1	41.2	3.4	17.5	7.7	12.4	
Asheville CSA	246	19,694	4.2	10,465	89.8	74.4	40.2	3.1	17.5	7.1	8.1	
Hickory MSA	78	5,020	1.3	3,417	83.9	66.7	35.8	5.5	12.8	10.6	20.5	
Raleigh CSA	716	81,169	12.1	45,867	89.1	57.7	42.4	3.1	22.3	7.8	20.0	
NC Non-MSA	176	6,135	3.0	2,185	86.4	81.3	42.7	3.8	5.7	9.8	13.1	
<b>Total</b>	<b>5,914</b>	<b>504,310</b>	<b>100.0</b>	<b>121,361</b>	<b>88.9</b>	<b>69.1</b>	<b>41.4</b>	<b>3.3</b>	<b>17.7</b>	<b>7.8</b>	<b>13.3</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-21	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Charlotte CSA	36	2,707	78.3	295	3.9	0.0	1.7	16.3	11.1	13.6	46.1	72.2	60.7	33.5	16.7	24.1	0.2	0.0	0.0	
Asheville CSA	2	26	4.6	48	0.7	0.0	4.2	9.5	0.0	6.3	69.4	100.0	70.8	20.4	0.0	18.8	0.0	0.0	0.0	
Hickory MSA	0	0	0.0	28	0.0	0.0	0.0	8.6	0.0	7.1	62.0	0.0	85.7	29.4	0.0	7.1	0.0	0.0	0.0	
Raleigh CSA	1	311	2.2	143	2.9	0.0	2.1	16.0	0.0	11.9	42.9	100.0	47.6	38.1	0.0	38.5	0.1	0.0	0.0	
NC Non-MSA	7	213	15.2	82	0.0	0.0	0.0	13.1	0.0	15.9	77.3	100.0	79.3	9.6	0.0	4.9	0.0	0.0	0.0	
<b>Total</b>	<b>46</b>	<b>3,257</b>	<b>100.0</b>	<b>596</b>	<b>2.9</b>	<b>0.0</b>	<b>1.7</b>	<b>15.0</b>	<b>8.7</b>	<b>12.6</b>	<b>49.8</b>	<b>78.3</b>	<b>62.1</b>	<b>32.2</b>	<b>13.0</b>	<b>23.7</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Charlotte CSA	36	2,707	78.3	295	96.5	83.3	40.3	2.1	2.8	1.4	13.9		
Asheville CSA	2	26	4.3	48	98.3	100.0	39.6	0.7	0.0	1.0	0.0		
Hickory MSA	0	0	0.0	28	96.3	0.0	25.0	2.2	0.0	1.5	0.0		
Raleigh CSA	1	311	2.2	143	95.9	100.0	61.5	2.2	0.0	1.9	0.0		
NC Non-MSA	7	213	15.2	82	98.0	57.1	52.4	1.4	14.3	0.7	28.6		
<b>Total</b>	<b>46</b>	<b>3,257</b>	<b>100.0</b>	<b>596</b>	<b>96.6</b>	<b>80.4</b>	<b>46.3</b>	<b>2.0</b>	<b>4.3</b>	<b>1.5</b>	<b>15.2</b>		

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Columbus CSA	16,781	2,928,187	27.2	129,282	4.9	4.3	4.7	18.1	17.1	15.8	37.6	32.7	33.9	39.4	45.8	45.6	0.0	0.0	0.0
Cleveland CSA	23,823	3,356,734	38.6	161,140	5.8	3.9	3.2	15.6	12.6	12.5	43.1	39.4	42.7	35.4	44.0	41.6	0.1	0.0	0.0
Dayton CSA	8,935	928,632	14.5	52,644	4.6	2.5	2.4	15.6	13.4	12.8	47.0	49.4	46.2	32.8	34.7	38.5	0.0	0.0	0.0
Lima CSA	892	76,788	1.4	5,487	1.8	1.8	1.1	10.6	12.6	8.9	49.8	51.2	48.0	37.9	34.6	42.0	0.0	0.0	0.0
Toledo CSA	9,541	1,140,467	15.5	31,296	5.0	2.4	1.5	12.4	9.8	8.7	47.5	40.4	44.4	35.1	47.4	45.4	0.0	0.0	0.0
OH Non-MSA	1,777	169,935	2.9	7,169	0.0	0.0	0.0	26.1	34.9	26.7	62.0	59.7	60.1	11.6	5.3	12.8	0.2	0.0	0.3
<b>Total</b>	<b>61,749</b>	<b>8,600,741</b>	<b>100.0</b>	<b>387,018</b>	<b>5.1</b>	<b>3.4</b>	<b>3.4</b>	<b>16.1</b>	<b>14.2</b>	<b>13.6</b>	<b>43.5</b>	<b>40.0</b>	<b>40.8</b>	<b>35.2</b>	<b>42.4</b>	<b>42.3</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbus CSA	16,781	2,928,187	27.2	129,282	22.0	12.4	6.9	16.9	19.6	18.1	19.5	21.4	20.4	41.6	42.0	37.8	0.0	4.6	16.9
Cleveland CSA	23,823	3,356,734	38.6	161,140	21.9	13.2	9.3	17.0	20.5	19.5	20.0	22.5	21.7	41.1	35.5	35.0	0.0	8.3	14.6
Dayton CSA	8,935	928,632	14.5	52,644	21.7	15.1	7.8	17.0	23.4	18.9	20.2	23.0	21.0	41.2	34.6	33.1	0.0	3.8	19.2
Lima CSA	892	76,788	1.4	5,487	19.1	13.7	6.8	17.0	23.3	20.5	20.8	26.1	23.6	43.1	34.9	34.1	0.0	2.0	15.1
Toledo CSA	9,541	1,140,467	15.5	31,296	21.8	11.4	7.1	16.5	21.9	19.7	20.2	24.6	23.0	41.5	38.9	38.0	0.0	3.1	12.2
OH Non-MSA	1,777	169,935	2.9	7,169	24.6	9.6	7.2	18.7	27.0	19.8	20.8	30.1	23.6	36.0	31.6	31.8	0.0	1.7	17.5
<b>Total</b>	<b>61,749</b>	<b>8,600,741</b>	<b>100.0</b>	<b>387,018</b>	<b>21.9</b>	<b>12.9</b>	<b>8.0</b>	<b>17.0</b>	<b>21.1</b>	<b>19.0</b>	<b>20.0</b>	<b>22.9</b>	<b>21.3</b>	<b>41.2</b>	<b>37.5</b>	<b>35.9</b>	<b>0.0</b>	<b>5.6</b>	<b>15.8</b>

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.



Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbus CSA	5,091	452,045	27.4	42,419	9.1	6.8	7.7	18.2	16.4	15.2	30.2	26.9	28.0	41.9	49.7	48.9	0.5	0.2	0.3
Cleveland CSA	7,146	762,392	38.4	73,250	8.5	7.2	7.4	15.5	11.9	13.8	36.7	34.1	35.7	38.3	46.3	42.3	0.9	0.4	0.7
Dayton CSA	3,030	376,494	16.3	16,828	6.2	4.8	5.5	18.0	17.4	17.1	43.4	43.5	42.2	32.4	34.3	35.2	0.0	0.0	0.0
Lima CSA	146	9,049	0.8	1,627	3.3	2.7	3.4	17.4	24.0	15.5	42.7	34.9	43.0	36.6	38.4	38.1	0.0	0.0	0.0
Toledo CSA	2,841	309,060	15.3	12,352	9.9	13.2	8.5	12.4	9.3	11.6	42.0	35.7	41.7	35.7	41.9	38.2	0.1	0.0	0.0
OH Non-MSA	334	24,886	1.8	2,363	0.6	0.0	0.1	31.0	47.0	24.7	54.5	49.4	59.3	10.1	3.3	13.0	3.9	0.3	2.9
<b>Total</b>	<b>18,588</b>	<b>1,933,926</b>	<b>100.0</b>	<b>148,839</b>	<b>8.3</b>	<b>7.4</b>	<b>7.2</b>	<b>16.7</b>	<b>14.4</b>	<b>14.6</b>	<b>36.6</b>	<b>34.2</b>	<b>35.2</b>	<b>37.7</b>	<b>43.8</b>	<b>42.5</b>	<b>0.6</b>	<b>0.2</b>	<b>0.5</b>

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus CSA	5,091	452,045	27.4	42,419	83.5	65.5	41.6	4.9	18.1	11.6	16.4
Cleveland CSA	7,146	762,392	38.4	73,250	83.4	63.5	46.5	6.0	22.2	10.6	14.3
Dayton CSA	3,030	376,494	16.3	16,828	81.1	60.6	41.0	5.8	26.9	13.0	12.5
Lima CSA	146	9,049	0.8	1,627	76.9	69.9	32.2	6.7	18.5	16.3	11.6
Toledo CSA	2,841	309,060	15.3	12,352	79.8	61.7	41.5	6.5	24.6	13.8	13.8
OH Non-MSA	334	24,886	1.8	2,363	79.2	67.4	33.5	4.9	18.0	15.9	14.7
<b>Total</b>	<b>18,588</b>	<b>1,933,926</b>	<b>100.0</b>	<b>148,839</b>	<b>82.6</b>	<b>63.4</b>	<b>43.7</b>	<b>5.7</b>	<b>22.1</b>	<b>11.7</b>	<b>14.5</b>

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Columbus CSA	55	2,785	22.0	605	4.5	0.0	2.8	15.2	16.4	9.1	43.4	49.1	52.6	36.8	34.5	35.5	0.1	0.0	0.0
Cleveland CSA	17	356	6.8	757	3.7	0.0	2.0	10.4	6.3	5.0	46.8	62.5	52.6	39.0	37.5	40.4	0.1	0.0	0.0
Dayton CSA	61	1,525	24.4	548	2.1	0.0	0.0	9.9	3.3	3.5	53.2	54.1	65.9	34.8	42.6	30.7	0.0	0.0	0.0
Lima CSA	16	318	6.4	144	0.3	0.0	0.0	4.8	0.0	0.7	56.2	56.3	75.7	38.7	43.8	23.6	0.0	0.0	0.0
Toledo CSA	38	1,525	15.2	486	2.3	2.6	0.8	6.5	7.9	2.7	52.3	60.5	62.6	38.8	28.9	34.0	0.0	0.0	0.0
OH Non-MSA	63	1,596	25.2	284	0.0	0.0	0.0	14.7	25.4	7.0	72.3	73.0	67.3	12.8	1.6	25.7	0.2	0.0	0.0
<b>Total</b>	<b>250</b>	<b>8,130</b>	<b>100.0</b>	<b>2,824</b>	<b>3.2</b>	<b>0.4</b>	<b>1.3</b>	<b>11.2</b>	<b>12.4</b>	<b>5.2</b>	<b>49.4</b>	<b>59.2</b>	<b>59.5</b>	<b>36.2</b>	<b>28.0</b>	<b>34.0</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Columbus CSA	55	2,785	22.0	605	96.1	83.6	50.6	2.2	0.0	1.7	16.4
Cleveland CSA	17	381	6.8	757	96.2	64.7	71.5	2.3	0.0	1.6	35.3
Dayton CSA	61	1,525	24.4	548	96.5	85.2	58.8	2.0	3.3	1.5	11.5
Lima CSA	16	318	6.4	144	97.7	75.0	65.3	1.0	0.0	1.3	25.0
Toledo CSA	38	1,525	15.2	486	96.5	78.9	72.6	2.3	5.3	1.3	15.8
OH Non-MSA	63	1,596	25.2	284	98.1	68.3	58.5	0.7	7.9	1.3	23.8
<b>Total</b>	<b>250</b>	<b>8,130</b>	<b>100.0</b>	<b>2,824</b>	<b>96.4</b>	<b>77.6</b>	<b>63.1</b>	<b>2.1</b>	<b>3.6</b>	<b>1.5</b>	<b>18.8</b>

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Greenville MSA	268	71,754	100.0	33,397	3.9	0.7	3.3	13.9	5.6	10.1	36.4	29.5	36.0	45.9	64.2	50.7	0.0	0.0	0.0	
<b>Total</b>	<b>268</b>	<b>71,754</b>	<b>100.0</b>	<b>33,397</b>	<b>3.9</b>	<b>0.7</b>	<b>3.3</b>	<b>13.9</b>	<b>5.6</b>	<b>10.1</b>	<b>36.4</b>	<b>29.5</b>	<b>36.0</b>	<b>45.9</b>	<b>64.2</b>	<b>50.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Greenville MSA	268	71,754	100.0	33,397	21.1	3.7	5.4	15.2	7.5	16.7	18.1	11.6	20.5	45.5	34.3	39.5	0.0	42.9	17.9	
<b>Total</b>	<b>268</b>	<b>71,754</b>	<b>100.0</b>	<b>33,397</b>	<b>21.1</b>	<b>3.7</b>	<b>5.4</b>	<b>15.2</b>	<b>7.5</b>	<b>16.7</b>	<b>18.1</b>	<b>11.6</b>	<b>20.5</b>	<b>45.5</b>	<b>34.3</b>	<b>39.5</b>	<b>0.0</b>	<b>42.9</b>	<b>17.9</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Greenville MSA	11	2,801	100.0	13,760	6.9	18.2	6.7	14.8	27.3	13.0	32.0	18.2	30.2	46.3	36.4	50.0	0.0	0.0	0.0
<b>Total</b>	<b>11</b>	<b>2,801</b>	<b>100.0</b>	<b>13,760</b>	<b>6.9</b>	<b>18.2</b>	<b>6.7</b>	<b>14.8</b>	<b>27.3</b>	<b>13.0</b>	<b>32.0</b>	<b>18.2</b>	<b>30.2</b>	<b>46.3</b>	<b>36.4</b>	<b>50.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Greenville MSA	11	2,801	100.0	13,760	83.6	54.5	40.8	5.2	27.3	11.2	18.2	
<b>Total</b>	<b>11</b>	<b>2,801</b>	<b>100.0</b>	<b>13,760</b>	<b>83.6</b>	<b>54.5</b>	<b>40.8</b>	<b>5.2</b>	<b>27.3</b>	<b>11.2</b>	<b>18.2</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Nashville MSA	5,089	1,277,480	91.3	112,139	3.8	3.6	5.0	15.8	13.5	13.3	39.7	33.1	37.4	40.6	49.7	44.3	0.1	0.1	0.1
Knoxville MSA	486	99,249	8.7	29,108	3.2	3.2	2.6	12.1	8.8	9.8	42.6	37.0	39.1	42.0	51.6	48.5	0.0	0.0	0.0
<b>Total</b>	<b>5,575</b>	<b>1,376,729</b>	<b>100.0</b>	<b>141,247</b>	<b>3.6</b>	<b>3.5</b>	<b>4.5</b>	<b>14.8</b>	<b>13.1</b>	<b>12.5</b>	<b>40.5</b>	<b>33.5</b>	<b>37.7</b>	<b>41.0</b>	<b>49.8</b>	<b>45.2</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>

*Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Nashville MSA	5,089	1,277,480	91.3	112,139	20.0	6.5	4.7	16.7	16.8	15.4	19.8	18.7	18.5	43.5	43.7	42.6	0.0	14.3	18.8
Knoxville MSA	486	99,249	8.7	29,108	20.1	8.2	5.1	15.4	13.6	16.0	18.9	17.9	18.6	45.7	48.8	43.0	0.0	11.5	17.3
<b>Total</b>	<b>5,575</b>	<b>1,376,729</b>	<b>100.0</b>	<b>141,247</b>	<b>20.0</b>	<b>6.7</b>	<b>4.7</b>	<b>16.4</b>	<b>16.5</b>	<b>15.5</b>	<b>19.6</b>	<b>18.6</b>	<b>18.5</b>	<b>44.0</b>	<b>44.2</b>	<b>42.7</b>	<b>0.0</b>	<b>14.0</b>	<b>18.5</b>

*Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Nashville MSA	2,264	133,391	93.3	44,032	7.8	6.1	8.3	18.3	18.3	17.8	27.6	28.4	26.2	45.3	45.9	46.9	0.9	1.3	0.9
Knoxville MSA	163	17,080	6.7	11,369	4.7	6.1	3.3	14.0	22.7	11.9	32.0	28.8	31.5	48.8	42.3	53.2	0.5	0.0	0.1
<b>Total</b>	<b>2,427</b>	<b>150,471</b>	<b>100.0</b>	<b>55,401</b>	<b>7.2</b>	<b>6.1</b>	<b>7.3</b>	<b>17.4</b>	<b>18.6</b>	<b>16.6</b>	<b>28.5</b>	<b>28.5</b>	<b>27.3</b>	<b>46.1</b>	<b>45.7</b>	<b>48.2</b>	<b>0.8</b>	<b>1.2</b>	<b>0.7</b>

*Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= \$1MM			Businesses with Revenues > \$1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Nashville MSA	2,264	133,391	93.3	44,032	88.3	68.3	41.3	3.7	11.4	8.1	20.3	
Knoxville MSA	163	17,080	6.7	11,369	84.9	53.4	39.2	4.7	25.8	10.3	20.9	
<b>Total</b>	<b>2,427</b>	<b>150,471</b>	<b>100.0</b>	<b>55,401</b>	<b>87.6</b>	<b>67.3</b>	<b>40.9</b>	<b>3.9</b>	<b>12.4</b>	<b>8.5</b>	<b>20.4</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2017-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Nashville MSA	8	144	100.0	189	4.5	12.5	2.6	14.5	0.0	20.6	36.8	25.0	42.3	43.6	62.5	33.9	0.6	0.0	0.5	
Knoxville MSA	0	0	0.0	21	3.0	0.0	0.0	12.1	0.0	0.0	37.8	0.0	47.6	46.6	0.0	52.4	0.5	0.0	0.0	
<b>Total</b>	<b>8</b>	<b>144</b>	<b>100.0</b>	<b>210</b>	<b>4.2</b>	<b>12.5</b>	<b>2.4</b>	<b>14.0</b>	<b>0.0</b>	<b>18.6</b>	<b>37.0</b>	<b>25.0</b>	<b>42.9</b>	<b>44.3</b>	<b>62.5</b>	<b>35.7</b>	<b>0.6</b>	<b>0.0</b>	<b>0.5</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= \$1MM			Farms with Revenues > \$1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Nashville MSA	8	144	100.0	189	96.0	75.0	49.2	1.8	12.5	2.1	12.5	
Knoxville MSA	0	0	0.0	21	96.1	0.0	57.1	1.9	0.0	2.0	0.0	
<b>Total</b>	<b>8</b>	<b>144</b>	<b>100.0</b>	<b>210</b>	<b>96.0</b>	<b>75.0</b>	<b>50.0</b>	<b>1.8</b>	<b>12.5</b>	<b>2.1</b>	<b>12.5</b>	

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.