



PUBLIC DISCLOSURE

November 13, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

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

18 NW 4th St, Evansville, IN 47708-1778

Office of the Comptroller of the Currency

Indianapolis Field Office 8777 Purdue Road, Suite 105 Indianapolis, IN 46268

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.

Table of Contents

Overall CRA Rating.....	2
Description of Institution.....	4
Scope of the Evaluation.....	5
Discriminatory or Other Illegal Credit Practices Review.....	7
State Rating.....	8
State of Colorado.....	8
State of Florida.....	14
State of Illinois.....	20
State of Indiana.....	30
State of Ohio.....	41
State of U.S. Virgin Islands.....	47
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 **Satisfactory**.

The lending test is rated: Satisfactory.

The community development test is rated: Outstanding.

The major factors that support this rating include:

- United Fidelity Bank (UFB or bank) has a reasonable loan-to-deposit (LTD) ratio.
- UFB originated a substantial majority of loans to borrowers located within its assessment areas (AAs).
- The lending test rating is based on the combined ratings of Indiana, the Island of St. Croix, Illinois, Colorado, Florida, and Ohio, listed in order of weight, for the geographic and borrower distribution of loans.
- The community development (CD) test rating is based on the combined ratings of Indiana, the Island of St. Croix, Illinois, Colorado, Florida, and Ohio, listed in order of weight. The bank demonstrated excellent responsiveness to the needs of its AAs in the states of Colorado, Florida, Indiana, and Ohio, and the Island of St. Croix. The bank demonstrated a reasonable responsiveness to the needs of its AAs in Illinois.
- The bank did not receive any CRA-related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, performance context, and credit needs of the AAs, the bank's LTD ratio is reasonable. The bank's average LTD ratio since the last examination was 23 percent, calculated on a bank-wide basis. This considered all quarterly LTD ratios from October 1, 2017, through December 31, 2019. Quarterly LTD ratios for the first three quarters of 2017 were considered in the last CRA performance evaluation. The bank's quarterly LTD ratio ranged from a high of 29.5 percent, at December 31, 2017, to a low of 19.7 percent, at September 30, 2019. Other banks in UFB's AAs, with assets between \$500 million and \$2 billion, had average LTD ratios that ranged from 45.5 percent to 126.5 percent.

While the bank's average LTD ratio is lower than other banks in their AAs, there are several factors the OCC considered to conclude the LTD ratio is reasonable. The OCC first considered activities of the bank's wholly owned subsidiary, Village Capital Corporation (VCC). Throughout the review period, loans to VCC averaged \$31 million and commitments to VCC averaged \$20.3 million, while VCC deposits averaged \$73.2 million. The OCC also considered the volume of unused lines of credit, which averaged \$16.1 million, and sold loans, which averaged \$2.4 million per quarter. The OCC then considered the large volume of affiliate funds on deposit throughout the review period, which averaged \$47 million per quarter. These considerations increased the LTD ratio to 34.8 percent.

Additionally, the OCC considered the bank's overall business strategy. The bank's strategy involves supporting low-income multifamily housing projects through investments. UFB invests in single project Government National Mortgage Association (GNMA) mortgage-backed securities. These multifamily housing projects are generally occupied by low-income families and are constructed in suburban areas. The bank's investment balance for these projects averaged \$410.9 million per quarter. These large investments have supported affordable housing projects throughout the United States. To fund these investments, UFB seeks municipal deposits outside of those relationships gained through branches. These deposits are tracked separately from total municipal deposits held by the bank. These specific deposits averaged \$74.9 million per quarter. When the LTD ratio is adjusted to account for these deposits, it increases to 38.8 percent. The OCC did not adjust the LTD ratio to account for the investments discussed above; however, the OCC does believe these activities are an integral part of the bank's activities and shows how UFB uses deposits to support low- and moderate-income (LMI) families.

Lending in Assessment Area

UFB originated and purchased a substantial majority of loans to borrowers located within its designated AAs. UFB originated 93.5 percent of loans by number inside their AAs. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. To calculate the bank's lending inside and outside their AAs, the OCC considered UFB's lending activity from January 1, 2017, through December 31, 2019. The proportion of lending inside versus outside the bank's AAs was calculated on a bank-wide basis. The OCC analyzed all Home Mortgage Disclosure Act (HMDA) reportable loans and selected a random sample of business and farm loans. Additionally, the OCC selected a random sample of home mortgage loans originated and purchased in St. Croix. Banks are not required to report loans originated and purchased in the U.S. Virgin Islands; therefore, the OCC analyzed home mortgage loans in St. Croix using the same sampling methodology used for business and farm loans. The number of loans sampled varied depending on the number of originations in each AA. See the Scope of Evaluation section under each state or territory for additional information. The following table illustrates the number and dollar volume of loans originated inside and outside the bank's AAs during the evaluation period.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	316	94.3	19	5.7	335	101,132	73.3	36,851	26.7	137,983
Small Business	51	87.9	7	12.1	58	11,842	82.5	2,515	17.5	14,357
Small Farm	19	95.0	1	5	20	2,922	97.8	67	2.2	2,989
Total Loans	386	93.5	27	6.5	413	115,896	74.6	39,433	25.4	155,329

*Source: Bank Data
Due to rounding, totals may not equal 100.00*

Source: Data reported under HMDA for most home mortgage loans; Loan sample for business loans, farm, and home mortgage loans in St. Croix

Description of Institution

UFB is a federally chartered savings association, established in 1914 and headquartered in Evansville, IN. UFB is a wholly owned subsidiary of Fidelity Federal Bancorp, also headquartered in Evansville, IN. As of December 31, 2019, the bank had total assets of \$968.8 million and tier 1 capital of \$82.4 million.

UFB is a multi-state bank operating 18 branches and 18 deposit-taking automated teller machines (ATMs). They have nine AAs in five states and one U.S. territory; Colorado, Florida, Illinois, Indiana, Ohio, and the U.S. Virgin Islands. UFB added two Florida branches via a FDIC assisted acquisition in October 2020, which will add another AA in Florida but will not be considered in this evaluation. They closed the only branch in Ohio in September 2019; however, since this AA was in place for the majority of the evaluation period, it will be considered in this evaluation.

UFB employs a unique business strategy which involves financing affordable housing projects by investing in single project GNMA mortgage-backed securities. UFB also supports affordable housing projects through its wholly owned subsidiary, VCC. VCC invests in and manages the development of affordable housing projects. UFB received consideration for activities undertaken by VCC during the review period.

In addition to the bank's focus on affordable housing projects, UFB also offers traditional lending products. The bank's primary lending products are residential real estate loans and business loans. UFB's New Hope Mortgage program encourages lending in low- and moderate-income (LMI) areas and to LMI borrowers. The program is offered in all the bank's AAs. The program started in 2014 and funded 106 loans totaling \$14.1 million during the evaluation period.

As of December 31, 2019, the bank reported \$176.7 million in outstanding loans and leases and had a net loans and leases to total assets ratio of 18 percent. The following table shows the portfolio composition as of December 31, 2019.

Loan Portfolio Composition			
Loan Category	Amount (\$000's)	Percent of Total Loans	Percent of Total Assets
Residential Loans	\$95,220	53.9%	9.8%
Business Loans	\$76,312	43.2%	7.9%
Farm Loans	\$4,014	2.3%	0.4%
Consumer Loans	\$1,181	0.6%	0.1%
Total Loans	\$176,727	100.0%	18.2%

Source: Call Report December 31, 2019

The following table shows the number of loans originated and purchased and the percent of loans originated by volume and dollar amount in 2017, 2018, and 2019. Primary products were determined by AA and will be discussed under each rating area.

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Residential Loans	433	58.0%	26.5%
Business Loans	166	22.2%	71.1%
Farm Loans	28	3.7%	1.9%
Consumer Loans	120	16.1%	0.5%
Total Loans	747	100.00%	100.0%

Source: Internal Bank Loan Origination Report for 2017, 2018, and 2019

UFB did not have any legal, financial or other factors impeding the bank’s ability to help meet the credit needs in its AAs. UFB received a “Satisfactory” rating at their previous Community Reinvestment Act evaluation, dated November 27, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

UFB was evaluated using Intermediate Small Bank (ISB) procedures to assess the bank’s record of meeting the credit needs of its community. ISB procedures include a lending test and CD test.

The lending test evaluates the bank’s record in meeting the credit needs of its AAs through lending activities. The OCC considered loans originated and purchased from January 1, 2017, through December 31, 2019 for the Lending in Assessment Area, Distribution of Loans by Income Level of Geography, and the Distribution of Loans by Income Level of Borrower analyses. The LTD ratio analysis considered average quarterly LTD ratios from October 1, 2017, through December 31, 2019. The OCC excluded the LTD ratios for the first three quarters of 2017, as these were considered in the last performance evaluation (PE), dated November 27, 2017. The lending test focuses on the bank’s primary lending products, which were determined by AA and are detailed in the Scope of Evaluation section under each state rating.

The CD Test evaluates the bank’s record in meeting the needs of its AAs through qualified CD loans, investments, and services. The OCC considered qualifying activities from November 27, 2017, through December 31, 2019. This includes all qualifying activities conducted since the last PE.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas 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 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 where applicable, multistate ratings. UFB operates in five states and one U.S. territory. UFB's performance in the state of Indiana received the most weight in our analysis. As of June 30, 2019, the bank had nine branches in Indiana, which accounts for 50 percent of all its branches, and 50 percent of total deposits. The Island of St. Croix accounts for 11.1 percent of branches and 33.2 percent of deposits. The state of Illinois accounts for 16.7 percent of branches and 8 percent of deposits. The state of Colorado accounts for 11.1 percent of branches and 2.9 percent of deposits. The states of Florida and Ohio each account for 5.6 percent of branches, with one branch each, and 3.2 and 2.6 percent of deposits, respectively.

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

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that 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 PE.

State Rating

State of Colorado

CRA rating for the State of Colorado: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels is excellent.
- The distribution of loans to borrowers of different income levels is excellent.
- UFB's CD performance demonstrates excellent responsiveness to the CD needs of the AA through CD loans and investments.

Description of Institution's Operations in Colorado

Denver-Aurora-Lakewood, CO MSA

The Denver-Aurora-Lakewood, CO MSA (Denver MSA) is a single-state AA consisting of 429 census tracts (CTs), encompassing all of Arapahoe, Denver, and Jefferson counties. There are 39 low-income CTs, 105 moderate-income CTs, 146 middle-income CTs, and 135 upper-income CTs in the AA. There were also four CTs in the AA that were not assigned an income classification. UFB has two branches and one deposit-taking ATM located in moderate-income CTs in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs.

Competition

Competition for deposits in the Denver MSA AA is strong. According to the June 30, 2019 FDIC Deposit Market Share Report, UFB's deposits in the AA totaled \$21.8 million, representing 2.9 percent of the bank's total deposits. UFB ranked 46 out of 59 deposit-taking institutions in the AA with a market share of 0.03 percent. The top five institutions for deposit market share in the AA were Wells Fargo Bank, US Bank, FirstBank, JPMorgan Chase, and KeyBank. These institutions accounted for 69.5 percent of deposits in the AA.

Competition for loans is also strong. Based on 2019 aggregate mortgage data, 780 lenders originated or purchased residential real estate loans in the AA. The top five lenders were United Shore Financial Service, Wells Fargo Bank, JPMorgan Chase, Quicken Loans, and American Financing Corporation. These lenders accounted for 23.4 percent of market share by number of loans originated. UFB ranked 165 out of the 780 lenders with 0.05 percent of market share.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate for the state of Colorado and Arapahoe, Denver, and Jefferson counties remained low and stable during the review period. The annual unemployment rate for the counties remained consistent with the state of Colorado's unemployment rate. The table below summarizes the annual unemployment rate for the state and the counties.

Unemployment Rates			
	2017	2018	2019
State of Colorado	2.8%	3.2%	2.8%
Arapahoe County	2.8%	3.1%	2.7%
Denver County	2.7%	3.1%	2.7%
Jefferson County	2.6%	2.9%	2.5%

Source: Bureau of Labor Statistics

The leading industries in the area, according to the August 2020 Moody's Analytics report, were professional and business services, government, education and health services, and leisure and hospitality services. These sectors accounted for 55.4 percent of total employment. The top five employers were University of Colorado Hospital, Children's Hospital, United Airlines, Centura Health Inc, and Lockheed Martin Corp.

According to the 2015 American Community Survey (ACS) Census data, there were 430,029 families in the AA. Low-income families represented 22.9 percent of families in the AA, while moderate-income families represented 17.9 percent of families.

Housing

According to the 2015 ACS Census data, 56.6 percent of housing in the AA was owner-occupied, 38.2 percent was renter-occupied, and 5.2 percent was vacant. In low-income CTs in the AA, 32.7 percent of housing was owner-occupied, 60.4 percent was renter-occupied, and 6.9 percent was vacant. In moderate-income CTs, 44.3 percent of housing was owner-occupied, 50.2 percent was renter-occupied, and 5.4 percent was vacant. Low- and moderate-income CTs accounted for 44.3 percent of multi-family housing units in the AA. The median age of the housing stock in the AA was 44 years, and the median housing value was \$284,622.

Community Contact

One community contact with an organization in the Denver MSA was reviewed in conjunction with this evaluation. The organization serves to help small and newly formed businesses in the area. The contact identified opportunities for involvement through Small Business Administration (SBA) programs, financial literacy panels for small business owners, and partnerships with CD organizations.

Demographic Information for Denver-Aurora-Lakewood CO MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	429	9.1	24.5	34.0	31.5	0.9
Population by Geography	1,810,308	9.9	24.4	34.8	30.7	0.1
Housing Units by Geography	768,099	9.4	24.1	35.9	30.6	0.0
Owner-Occupied Units by Geography	434,682	5.4	18.9	36.7	39.0	0.0
Occupied Rental Units by Geography	293,606	14.8	31.6	35.1	18.4	0.0
Vacant Units by Geography	39,811	12.4	25.2	33.9	28.4	0.0
Businesses by Geography	258,070	6.8	18.6	33.1	41.0	0.4
Farms by Geography	4,351	9.6	20.7	32.6	36.5	0.7
Family Distribution by Income Level	430,029	22.9	17.9	19.9	39.3	0.0
Household Distribution by Income Level	728,288	25.4	17.1	18.1	39.4	0.0
Median Family Income		\$80,820	Median Housing Value			\$284,622
			Median Gross Rent			\$1,043
			Families Below Poverty Level			8.7%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Colorado

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

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Home Mortgage Loans	88	86.3%	89.4%
Business Loans	14	13.7%	10.6%
Farm Loans	0	0.0%	0.0%
Consumer Loans	0	0.0%	0.0%
Total Loans	102	100.00%	100.0%

Source: Internal Bank Loan Origination Report for 2017, 2018, and 2019

Home mortgage loans are the bank's primary lending product in the AA. The bank originated and purchased 86.3 percent of residential real estate loans by number and 89.4 percent by dollar volume in

the AA during the evaluation period. The OCC used the bank's HMDA reportable loans for this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The overall geographic distribution of home mortgage loans is excellent. The bank's lending in low-income CTs was within a reasonable range above the percentage of owner-occupied housing units and aggregate lending in those CTs. The bank's lending in moderate-income CTs significantly exceeded the percentage of owner-occupied housing units and also significantly exceeded aggregate lending in those CTs.

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is excellent. The bank's lending to low-income borrowers was within a reasonable range above the percentage of low-income families in the AA and significantly exceeded aggregate lending to low-income borrowers. The bank's lending to moderate-income borrowers significantly exceeded the percentage of moderate-income families and aggregate lending in the AA.

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

Responses to Complaints

The bank did not receive any CRA related complaints during the review period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD test in the state of Colorado is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Denver MSA	2	100.0	9,208	100.0

The bank made two CD loans, totaling \$9.2 million. These loans supported affordable housing through the financing of a 156-unit apartment complex in the Denver MSA AA, where greater than 50 percent of the residents are LMI. Additionally, the bank originated four loans, totaling \$21.4 million, that serve the broader statewide and regional area. These loans supported the building of two additional apartment complexes, with a total of 541 units, where greater than 50 percent of residents are LMI.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Denver MSA	2	27,560	2	2	4	100.0	27,562	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.

UFB made four investments, totaling \$27.6 million, in the Denver MSA AA during the evaluation period. The investments included two prior period investments, with a current book value of \$27.6 million. These investments supported affordable housing. They also made two donations, totaling \$2,000, to an organization that funds legal services for LMI individuals. Additionally, the bank made 27 investments in the broader statewide area, which totaled \$74.9 million. These investments consisted of five prior period investments and 22 current period investments primarily supporting affordable housing.

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

Extent to Which the Bank Provides Community Development Services

The bank did not provide any qualifying CD services in the Denver MSA AA during the evaluation period. However, both branches in this AA are located in moderate-income CTs.

State Rating

State of Florida

CRA rating for the State of Florida: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels is reasonable.
- UFB's CD performance demonstrates excellent responsiveness to the CD needs of its AA through CD loans, qualified investments, and CD services.

Description of Institution's Operations in Florida

Cape Coral-Fort Myers, FL MSA

The Cape Coral-Fort Myers, FL MSA (Fort Myers MSA) is a single-state AA consisting of 167 CTs, encompassing all of Lee County. There are seven low-income CTs, 42 moderate-income CTs, 60 middle-income CTs, and 56 upper-income CTs in the AA. There were also two CTs in the AA that were not assigned an income classification. UFB has one branch and deposit-taking ATM located in an upper-income CT in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

Competition

Competition for deposits in the Fort Myers MSA AA is moderate. According to the June 30, 2019 FDIC Deposit Market Share Report, UFB's deposits in the AA totaled \$23.8 million, representing 3.2 percent of the bank's total deposits. UFB ranked 30 out of 32 deposit-taking institutions in the AA with a market share of 0.15 percent. The top five institutions for deposit market share in the AA were Wells Fargo Bank, Bank of America, SunTrust Bank, Fifth Third Bank, and FineMark Bank & Trust. These institutions accounted for 55.9 percent of deposits in the AA.

Competition for loans is strong. Based on 2019 aggregate mortgage data, 850 lenders originated or purchased residential real estate loans in the AA. The top five lenders were Wells Fargo Bank, Quicken Loans, Suncoast Credit Union, United Shore Financial Service, and Pennymac Loan Services. These lenders accounted for 25.6 percent of market share by number of loans originated. UFB ranked 220 out of the 850 lenders with 0.03 percent of market share.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate for Florida and Lee County improved during the review period. The annual unemployment rate for Lee County remained consistent with the state of Florida's unemployment rate. The table below summarizes the annual unemployment rate for the state and Lee County.

Unemployment Rates			
	2017	2018	2019
State of Florida	4.2%	3.6%	3.1%
Lee County	4.1%	3.5%	3.1%

Source: Bureau of Labor Statistics

The leading industries in the area, according to the August 2020 Moody's Analytics report, were government, leisure and hospitality services, retail trade, and professional and business services. These sectors accounted for 60 percent of total employment. The top five employers were Lee Memorial Health System, Publix, Wal-Mart, Winn Dixie, and Florida Gulf Coast University.

According to the 2015 ACS Census data, there were 165,635 families in the AA. Low-income families represented 20.7 percent of families in the AA, while moderate-income families represented 18.5 percent of families.

Housing

According to the 2015 ACS Census data, 46.5 percent of housing in the AA was owner-occupied, 20.9 percent was renter-occupied, and 32.6 percent was vacant. In low-income CTs in the AA, 27.7 percent of housing was owner-occupied, 51.1 percent was renter-occupied, and 21.2 percent was vacant. In moderate-income CTs, 40.7 percent of housing was owner-occupied, 32.3 percent was renter-occupied, and 27.0 percent was vacant. Low- and moderate-income CTs accounted for 21.7 percent of multi-family housing units in the AA. The median age of the housing stock in the AA was 28 years, and the median housing value was \$192,233. Although vacancy rates are relatively high, Fort Myers is a popular vacation destination. Vacation or seasonal homes are considered vacant for census purposes.

Community Contact

Two community contacts with organizations in the Fort Myers MSA were reviewed in conjunction with this evaluation. One organization serves to promote financial literacy and locating affordable housing for residents, while the other organization works to improve business conditions in the area. The contacts identified funding for affordable housing projects and small business lending as needs in the community.

Demographic Information for Cape Coral – Fort Myers, FL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	167	4.2	25.1	35.9	33.5	1.2
Population by Geography	663,675	4.7	27.1	42.3	25.9	0.0
Housing Units by Geography	374,333	3.5	21.3	40.9	34.4	0.0
Owner-Occupied Units by Geography	174,162	2.1	18.6	44.2	35.1	0.0
Occupied Rental Units by Geography	78,125	8.5	32.9	38.0	20.5	0.0
Vacant Units by Geography	122,046	2.3	17.6	38.0	42.1	0.0
Businesses by Geography	88,180	2.6	22.5	40.1	34.5	0.2
Farms by Geography	2,801	3.2	25.5	46.6	24.6	0.0
Family Distribution by Income Level	165,635	20.7	18.5	19.7	41.1	0.0
Household Distribution by Income Level	252,287	22.6	17.2	18.8	41.4	0.0
Median Family Income	\$57,627	Median Housing Value				\$192,233
		Median Gross Rent				\$970
		Families Below Poverty Level				11.1%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Florida

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

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Home Mortgage Loans	14	93.3%	99.9%
Business Loans	0	0.0%	0.0%
Farm Loans	0	0.0%	0.0%
Consumer Loans	1	6.7%	0.1%
Total Loans	102	100.00%	100.0%

Source: Internal Bank Loan Origination Report for 2017, 2018, and 2019

Home mortgage loans are the bank's primary lending product in the AA. The bank originated and purchased 93.3 percent of residential real estate loans by number and 99.9 percent by dollar volume in the AA during the evaluation period. The OCC used the bank's HMDA reportable loans for this evaluation.

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 Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Florida is reasonable.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The overall geographic distribution of home mortgage loans is reasonable. The bank's lending in low-income geographies was lower than the percentage of owner-occupied housing units and lower than aggregate lending in those CTs. The bank did not make any loans in low-income geographies during the review period; however, only 2.1 percent of owner-occupied housing is located in these CTs. Further, aggregate lending in the low-income CTs represented only 1.7 percent of lending in the AA. The bank's lending in moderate-income CTs significantly exceeded the percentage of owner-occupied housing and aggregate lending in those CTs. As a percent, the bank made 38.9 percent of loans in moderate-income CTs in this AA; however, given the bank made only 18 loans in the AA during the review period, this equates to seven loans in moderate-income CTs.

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

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is reasonable. The bank's lending to low-income borrowers was significantly lower than the percentage of low-income families in the AA and was below aggregate lending in the AA. The bank's lending to moderate-income borrowers significantly exceeded the percentage of low-income families and aggregate lending in the AA.

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

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Fort Myers MSA	8	100.0	23,198	100.0

UFB originated eight CD loans, totaling \$23.2 million, in the Fort Myers MSA. These loans supported affordable housing through the financing of three apartment complexes, which designate at least 51 percent of their units to LMI tenants. These apartment complexes offer over 200 units. Additionally, the bank originated four loans in the broader statewide area, totaling \$28.8 million. These loans supported the building of two apartment complexes, with 172 units, that designate at least 51 percent of units to LMI tenants.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Fort Myers MSA	3	958	1	1	3	100.0	959	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.

UFB made three investments, totaling \$959,000, in the Fort Myers MSA AA. The prior period investments, which have a current book value of \$958,000, supported affordable housing in the AA. The current period investment was a donation of \$250, shown in the table as \$1,000 for illustrative purposes, to an organization that provides basic needs to teen mothers in the foster care system.

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

Extent to Which the Bank Provides Community Development Services

During the evaluation period, two employees provided CD services to two organizations. These employees spent approximately 16 hours providing assistance to these organizations. This branch had only two full-time employees and one part time employee during the evaluation period. These services supported organizations providing services to LMI individuals and providing direction on affordable housing projects in the AA.

State Rating

State of Illinois

CRA rating for the State of Illinois: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels and businesses and farms of different sizes is reasonable.
- UFB's CD performance demonstrates adequate responsiveness to the CD needs of its AAs through CD loans, qualified investments, and CD services.

Description of Institution's Operations in Illinois

Chicago-Naperville-Evanston, IL MSA

The Chicago-Naperville-Evanston, IL MSA (Chicago MSA) is a single-state AA consisting of 952 CTs, encompassing a portion of Cook County. There are 247 low-income CTs, 313 moderate-income CTs, 185 middle-income CTs, and 196 upper-income CTs in the AA. There are also 11 CTs in the AA that were not assigned an income classification. UFB has two branches, both with deposit-taking ATMs, located in moderate-income CTs in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

Competition

Competition for deposits in the Chicago MSA AA is strong. According to the June 30, 2019 FDIC Deposit Market Share Report, UFB's deposits in the AA totaled \$46.5 million, representing 6.3 percent of the bank's total deposits. UFB ranked 91 out of 105 deposit-taking institutions in the AA with a market share of 0.02 percent. The top five institutions for deposit market share in the AA were JPMorgan Chase, BMO Harris, Bank of America, The Northern Trust Company, and CIBC Bank. These institutions accounted for 63.7 percent of deposits in the AA.

Competition for loans is also strong. Based on 2019 aggregate mortgage data, 687 lenders originated or purchased residential real estate loans in the AA. The top five lenders were JPMorgan Chase, Guaranteed Rate Inc., Wells Fargo Bank, US Bank, and United Shore Financial Service. These lenders accounted for 34.4 percent of market share by number of loans originated. UFB ranked 354 out of the 687 lenders with 0.01 percent of market share.

In 2018, there were 186 CRA reporting lenders that originated or purchased small business loans in the AA (as of the date of this report, 2019 CRA lending date was not available). Of the lenders that reported,

Chase Bank, American Express, and CitiBank had the largest market share, totaling 52.6 percent of the number of loans originated or purchased. UFB was not required to report small business loans originated or purchased. In 2018, there were 170,583 non-farm businesses in the AA according to 2018 Dun & Bradstreet data. Businesses recording revenues of less than \$1 million represented 81.2 percent of businesses in the AA.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate for the state of Illinois and Cook County improved during the review period. The annual unemployment rate for Cook County remained relatively consistent with the state-wide unemployment rate. The table below summarizes the annual unemployment rate for the state and Cook County.

Unemployment Rates			
	2017	2018	2019
State of Illinois	4.9%	4.3%	4.0%
Cook County	5.1%	4.1%	3.8%

Source: Bureau of Labor Statistics

The leading industries in the area, according to the August 2020 Moody's Analytics report, were professional and business services, education and health services, government, and leisure and hospitality services. These sectors accounted for 55.8 percent of total employment. The top five employers were Advocate Health Care System, Northwestern Memorial Healthcare, Amita Health, University of Chicago, and JPMorgan Chase & Co.

According to the 2015 ACS Census data, there were 734,715 families in the AA. Low-income families represented 34.0 percent of families in the AA, while moderate-income families represented 17.9 percent of families.

Housing

According to the 2015 ACS Census data, 42.6 percent of housing in the AA was owner-occupied, 44.9 percent was renter-occupied, and 12.5 percent was vacant. In low-income CTs in the AA, 23.9 percent of housing was owner-occupied, 55.6 percent was renter-occupied, and 20.5 percent was vacant. In moderate-income CTs, 42.7 percent of housing was owner-occupied, 45.1 percent was renter-occupied, and 12.2 percent was vacant. Low- and moderate-income CTs accounted for 40.8 percent of multi-family housing units in the AA. The median age of the housing stock in the AA was 66 years, and the median housing value was \$232,561.

Community Contact

One community contact with an organization in the Chicago MSA was reviewed in conjunction with this evaluation. The organization serves in the areas of fair lending, wealth creation, and financial system reform in the local community through research projects and policy advising. The contact identified several needs in LMI areas including additional branches, smaller denomination mortgage loans, and funding for affordable multi-family housing projects. Additional needs noted were small business and flexible home loan products.

Demographic Information for Chicago-Naperville-Evanston IL MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	952	25.9	32.9	19.4	20.6	1.2
Population by Geography	3,443,671	21.5	35.4	22.3	20.4	0.4
Housing Units by Geography	1,476,751	20.7	32.0	21.6	25.0	0.6
Owner-Occupied Units by Geography	628,708	11.7	32.1	28.8	27.1	0.3
Occupied Rental Units by Geography	662,432	25.7	32.2	16.7	24.4	0.9
Vacant Units by Geography	185,611	33.8	31.1	14.4	20.1	0.7
Businesses by Geography	213,166	11.0	22.7	20.4	45.0	1.0
Farms by Geography	1,807	11.2	27.9	26.2	34.4	0.3
Family Distribution by Income Level	734,715	34.0	17.9	16.7	31.3	0.0
Household Distribution by Income Level	1,291,140	33.4	16.4	16.5	33.8	0.0
Median Family Income		\$75,024	Median Housing Value			\$232,561
			Median Gross Rent			\$1,018
			Families Below Poverty Level			17.0%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Illinois Non-MSA

The Illinois non-MSA is a single-state AA consisting of 15 CTs, encompassing all of Effingham and Fayette counties. There are no low-income CTs, three moderate-income CTs, eight middle-income CTs, and four upper-income CTs in the AA. UFB has one branch with a deposit-taking ATM located in a moderate-income CT. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

Competition

Competition for deposits in the Illinois non-MSA AA is moderate. According to the June 30, 2019 FDIC Deposit Market Share Report, UFB's deposits in the AA totaled \$12.9 million, representing 1.7 percent of the bank's total deposits. UFB ranked 15 out of 16 deposit-taking institutions in the AA with a market share of 0.6 percent. The top five institutions for deposit market share in the AA were Midlands State Bank, Dieterich Bank, Washington Savings Bank, The FNB Community Bank, and Teutopolis State Bank. These institutions accounted for 74.9 percent of deposits in the AA.

Competition for loans is notable. Based on 2019 aggregate mortgage data, 120 lenders originated or purchased residential real estate loans in the AA. The top five lenders were Dieterich Bank, Petefish Skiles & Co Bank, The FNB Community Bank, Midland States Bank, and Quicken Loans. These lenders accounted for 50.2 percent of market share by number of loans originated. UFB ranked 31 out of the 120 lenders with 0.4 percent of market share.

In 2018, there were 16 CRA reporting lenders that originated or purchased small farm loans. Of the lenders that reported, First Mid Bank & Trust, John Deere Financial, and Midland States Bank had the largest market share, totaling 65.3 percent of the number of loans originated or purchased. UFB was not required to report small farm loans originated or purchased. In 2018, there were 333 farms in the AA according to 2018 Dun & Bradstreet data. Farms recording revenues less than \$1 million represented 97.0 percent of farms in the AA.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate for the state of Illinois and Effingham and Fayette counties improved during the review period. The annual unemployment rate for Effingham County remained slightly below the state of Illinois's unemployment rate, while Fayette County experienced higher rates of unemployment. The table below summarizes the annual unemployment rate for the state and the counties.

Unemployment Rates			
	2017	2018	2019
State of Illinois	4.9%	4.3%	4.0%
Effingham County	3.8%	3.7%	3.3%
Fayette County	5.5%	5.1%	4.4%

Source: Bureau of Labor Statistics

According to the City of Effingham's website, the city's location and transportation system allow for an increase in the commercial and industrial sectors. The city's population approximately doubles during the day as workers commute to the micropolitan center and has a trade population of approximately 175,000. The top employers in the city include a hospital, dental services company, commercial printing, agriculture product producer, and dental software company. Vandalia, Illinois is the county seat of Fayette County. According to the Greater Fayette County Chamber of Commerce, the City of Vandalia is home to several historical sites, a newly renovated downtown business district, and a hospital.

According to the 2015 ACS Census data, there were 14,314 families in the AA. Low-income families represented 19.3 percent of families in the AA, while moderate-income families represented 17.6 percent of families.

Housing

According to the 2015 ACS Census data, 70.3 percent of housing in the AA was owner-occupied, 17.7 percent was renter-occupied, and 12 percent was vacant. In moderate-income CTs, 65.2 percent of housing was owner-occupied, 18 percent was renter occupied, and 16.8 percent was vacant. Moderate-income CTs accounted for 10.9 percent of multi-family housing units in the AA. The median age of the housing stock in the AA was 47 years, and the median housing value was \$109,841.

Community Contact

One community contact with an organization in the Illinois non-MSA was reviewed in conjunction with this evaluation. The organization provides support and services to the business and general community. The contact identified a need for 1-4 family construction lending in LMI areas.

Demographic Information for the IL Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	15	0.0	20.0	53.3	26.7	0.0
Population by Geography	56,468	0.0	12.2	55.1	32.7	0.0
Housing Units by Geography	23,961	0.0	13.1	54.5	32.5	0.0
Owner-Occupied Units by Geography	16,853	0.0	12.1	51.3	36.6	0.0
Occupied Rental Units by Geography	4,238	0.0	13.3	66.1	20.6	0.0
Vacant Units by Geography	2,870	0.0	18.3	55.8	25.9	0.0
Businesses by Geography	3,729	0.0	10.1	56.2	33.7	0.0
Farms by Geography	340	0.0	10.9	45.3	43.8	0.0
Family Distribution by Income Level	14,314	19.3	17.6	21.7	41.4	0.0
Household Distribution by Income Level	21,091	21.5	16.0	18.0	44.5	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$109,841
			Median Gross Rent			\$581
			Families Below Poverty Level			9.7%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Illinois

The bank has two AAs in the state of Illinois, the Chicago MSA and the Illinois non-MSA AAs. Within the state, the Chicago MSA AA accounts for 78.3 percent of deposits and 43.9 percent of loans by number. The Illinois non-MSA accounts for 21.7 percent of deposits and 56.1 percent of loans by number. Both AAs received full-scope reviews. The Chicago MSA AA received the most weight in our analysis. The table below shows the bank's lending in the AAs during the review period:

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Chicago MSA:			
Home Mortgage Loans	37	53.6%	59.2%
Business Loans	17	24.7%	38.8%
Farm Loans	0	0.0%	0.0%
Consumer Loans	15	21.7%	2.0%
Total Loans	69	100.00%	100.0%
Illinois non-MSA:			
Home Mortgage Loans	41	46.6%	31.2%
Business Loans	13	14.8%	28.8%
Farm Loans	26	29.5%	39.1%
Consumer Loans	8	9.1%	0.9%
Total Loans	88	100.00%	100.0%

Source: Internal Bank Loan Origination Report for 2017, 2018, and 2019

In the Chicago MSA AA, home mortgage loans and business loans are the bank's primary lending products. As noted above, home mortgage loans accounted for 59.2 percent of lending, by dollar volume, and business loans accounted for 38.8 percent of lending. The OCC used the bank's HMDA reportable loans for home mortgage data in this evaluation. For business loans, the OCC reviewed all 17 loans and found that one loan was originated for an amount greater than \$1 million. This loan was removed, leaving 16 loans of less than \$1 million in the AA. These loans were used for the geographic and borrower distribution analysis. Home mortgage loans received the most weight, given the number and dollar volume of originations and purchases.

In the Illinois non-MSA AA, home mortgage loans and farm loans are the bank's primary lending products. Home mortgage loans accounted for 31.2 percent of lending, by dollar volume, and farm loans accounted for 39.1 percent of lending. The OCC used the bank's HMDA reportable loans for home mortgage data in this evaluation. For farm loans, the OCC selected a random sample of 20 farm loans originated or purchased in the AA for the geographic and borrower distribution analysis. Home mortgage loans was weighted more heavily given the volume of originations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

The bank's performance under the lending test in the state of Illinois is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Chicago MSA

The overall geographic distribution of home mortgage loans in the Chicago MSA AA is reasonable. The bank's lending in low-income CTs was within a reasonable range above the percentage of owner-occupied housing units and significantly exceeded aggregate lending in the CTs. The bank's lending in moderate-income CTs significantly exceeded the percentage of owner-occupied housing and aggregate lending in those CTs. However, to determine the reasonableness the OC considered the number of loans originated or purchased in the AA. The bank originated only 39 loans in the AA during the review period, 10 of those were in low-income CTs and 22 were in moderate-income CTs.

IL Non-MSA

The overall geographic distribution of home mortgage loans in the IL non-MSA AA is reasonable. There are no low-income CTs in the AA. The bank's lending in moderate-income CTs significantly exceeded the percentage of owner-occupied housing units and aggregate lending in the CTs. As a percent, the bank made 44.4 percent of loans in moderate-income CTs in the AA; however, the bank only made 18 loans in this AA. This equates to the bank originating eight loans in moderate-income CTs.

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

Small Loans to Businesses

Chicago MSA

The overall geographic distribution of loans to small businesses is reasonable. The bank's lending in low-income CTs was within a reasonable range above the percentage of businesses and aggregate lending in those CTs. The bank's lending in moderate-income CTs significantly exceeded the percentage of businesses and aggregate lending in those CTs. However, in determining the reasonableness the OCC considered the number of loans originated or purchased. The bank originated and purchased 16 small business loans in the AA during the review period, this equates to three loans in low-income CTs and 13 loans in moderate-income CTs.

Refer to Table Q in the state of Illinois 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.

Small Loans to Farms

IL Non-MSA

The overall geographic distribution of small farm loans is reasonable. There are no low-income CTs in the AA. The bank's lending in moderate-income CTs was within a reasonable range above the percentage of farms and within a reasonable range above aggregate lending in those CTs. The bank originated 20 percent of small loans to farms in moderate-income CTs, where 10.9 percent of farms are located. Aggregate lending in these CTs was 12.2 percent.

Refer to Table S in the state of Illinois 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.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Chicago MSA

The overall borrower distribution of home mortgage loans in the Chicago MSA AA is reasonable. The bank's lending to low-income borrowers was within a reasonable range below the percentage of low-income families in the AA and significantly exceeded aggregate lending. The bank's lending to moderate-income borrowers was within a reasonable range above the percentage of moderate-income families and aggregate lending in the AA.

IL Non-MSA

The overall borrower distribution of home mortgage loans in the IL non-MSA AA is reasonable. The bank's lending to low-income borrowers was within a reasonable range above the percentage of low-income families and significantly exceeded aggregate lending in the AA. The bank's lending to moderate-income borrowers was within a reasonable range above the percentage of moderate-income families and aggregate lending in the AA. However, as noted previously lending in the AA for the three-year evaluation period was low, totaling only 18 home mortgage loans. Therefore, the impact to low- and moderate-income borrowers was not significant, resulting in six loans to low-income borrowers and five to moderate-income borrowers. Given this information, the OCC considered the borrower distribution to be reasonable.

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

Small Loans to Businesses

Chicago MSA

The overall distribution of loans to businesses of different sizes is reasonable. The bank's lending was within a reasonable range below the percentage of small businesses, businesses with \$1 million or less in revenues, and significantly exceeded aggregate lending. The bank originated 11, of the 16 loans originated, to small businesses in the AA.

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

Small Loans to Farms

IL Non-MSA

The overall distribution of loans to farms of different sizes is excellent. The bank's lending to small farms, farms with revenues of \$1 million or less, was within a reasonable range above the percentage of

small farms in the AA and significantly exceeded aggregate lending. Our sample included 20 loans and all loans were to small farms.

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

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Illinois is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

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

Number and Amount of Community Development Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Chicago MSA	2	100.0	240	100.0
IL non-MSA	0	0.0	0	0.0
Total	2	100.0	240	100.0

Chicago MSA

UFB originated two CD loans, totaling \$240,000, in the Chicago MSA AA. The loans supported affordable housing through the financing of two six-unit apartment buildings. One building is located in a low-income CT and the other is located in a moderate-income CT, both offering below market rate rents.

IL non-MSA

The bank did not make any CD loans in the IL non-MSA AA during the evaluation period.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago MSA	2	5,930	13	6,017	15	88.2	11,947	99.9	0	0
IL non-MSA	0	0	2	1	2	11.8	1	0.1	0	0
Total	2	5,930	15	6,018	17	100.0	11,948	100.0	0	0

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

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

Chicago MSA

UFB made 15 investments, totaling \$11.9 million, in the Chicago MSA AA. Two prior period investments, totaling \$5.9 million, supported affordable housing in the AA. The current period investment consisted of two investments in affordable housing and 11 donations. The donations supported a variety of organizations, which in part provide services to schools primarily serving LMI students, financial literacy programs, and homeownership counseling to LMI individuals.

IL non-MSA

UFB made two donations, totaling approximately \$1,000, in the IL non-MSA AA. The donations supported organizations providing financial literacy and addressing the basic needs of low-income individuals.

Statewide/Regional

Additionally, UFB had one prior period investment with a current book value of \$1.1 million outside of the bank's AAs but within the state of Illinois. This investment supported affordable housing in the state.

Extent to Which the Bank Provides Community Development Services

Chicago MSA

During the evaluation period, three employees performed 461 hours of CD services for seven organizations. These employees represented 23 percent of employees at these branches. These employees provided financial literacy courses, homeownership counseling, and assisted in application completion and resume building for LMI individuals, among other activities. One employee served in a leadership role, serving on the board of two of these organizations. Additionally, both branches in this AA area located in moderate-income CTs.

IL non-MSA

During the evaluation period, four employees performed 264 hours of CD services for three organizations. This represented 100 percent of employees working at this branch during this period. These services included assisting organizations that serve LMI people and LMI areas and non-profit organizations in a variety of roles. Two employees served in leadership roles, serving on the board of one organization. Additionally, this branch is located in a moderate-income CT.

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

State Rating

State of Indiana

CRA rating for the State of Indiana: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- UFB's CD performance demonstrates excellent responsiveness to the CD needs of its AA through CD loans, qualified investments, and CD services.

Description of Institution's Operations in Indiana

Evansville, IN-KY MSA

The Evansville, IN-KY MSA (Evansville MSA) AA consists of 67 CTs, encompassing all of Posey, Vanderburgh, and Warrick counties. There are 10 low-income CTs, 13 moderate-income CTs, 28 middle-income CTs, and 14 upper-income CTs in the AA. There were also two CTs in the AA that were not assigned an income classification. UFB has seven branches all with deposit-taking ATMs located in the AA. Five branches are located in middle-income CTs, one branch is in an upper-income CT, and one branch is in an AA without an income classification. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

Competition

Competition for deposits in the Evansville MSA AA is moderate. According to the June 30, 2019 FDIC Deposit Market Share Report, UFB's deposits in the AA totaled \$262.2 million, representing 35.4 percent of the bank's total deposits. UFB ranked 4 out of 18 deposit-taking institutions in the AA with a market share of 4.7 percent. The top three institutions for deposit market share in the AA were Old National Bank, Fifth Third Bank, and German American Bank. These institutions accounted for 75.6 percent of deposits in the AA.

Competition for loans is strong. Based on 2019 aggregate mortgage data, 267 lenders originated or purchased residential real estate loans in the AA. The top five lenders were Evansville Teachers Federal Credit Union, Mortgage Masters of Indiana, Fifth Third Bank, Heritage Federal Credit Union, and Old National Bank. These lenders accounted for 43.4 percent of market share by number of loans originated. UFB ranked 43 out of the 267 lenders with 0.34 percent of market share.

In 2018, there were 73 CRA reporting lenders that originated or purchased small business loans in the AA. Of those lender, American Express, Old National Bank, and Chase Bank had the largest market share, totaling 37.3 percent of the number of loans originated or purchased. UFB was not required to report small business loans originated or purchased. In 2018, there were 14,730 non-farm businesses in the AA according to 2018 Dun & Bradstreet data. Businesses recording revenues less than \$1 million represented 77.3 percent of businesses in the AA.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate for the state of Indiana and Posey, Vanderburgh, and Warrick counties improved during the review period. The annual unemployment rate for the counties remained slightly below the state of Indiana’s unemployment rate. The table below summarizes the annual unemployment rate for the state and the counties.

Unemployment Rates			
	2017	2018	2019
State of Indiana	3.6%	3.5%	3.3%
Posey County	3.0%	2.9%	2.7%
Vanderburgh County	3.3%	3.2%	3.1%
Warrick County	3.2%	3.0%	2.9%

Source: Bureau of Labor Statistics

The leading industries in the area, according to the August 2020 Moody’s Analytics report, were education and health services, manufacturing, professional and business services, and government. These sectors accounted for 55.2 percent of total employment. The top five employers were Deaconess Hospital, Toyota Motor Manufacturing, St. Vincent, Berry Global, and University of Southern Indiana.

According to the 2015 ACS Census data, there were 69,352 families in the AA. Low-income families represented 20.6 percent of families in the AA, while moderate-income families represented 17.4 percent of families.

Housing

According to the 2015 ACS Census data, 62 percent of housing in the AA was owner-occupied, 27.8 percent was renter-occupied, and 10.2 percent was vacant. In low-income CTs in the AA, 35.1 percent of housing was owner-occupied, 44.8 percent was renter occupied, and 20.2 percent was vacant. In moderate-income CTs, 39.4 percent of housing was owner-occupied, 47 percent was renter occupied, and 13.6 percent was vacant. Low- and moderate-income CTs accounted for 52.4 percent of multi-family housing units in the AA. The median age of the housing stock in the AA was 50 years, and the median housing value was \$120,546.

Community Contact

Two community contacts with organizations in the Evansville MSA were reviewed in conjunction with this evaluation. Both organizations serve to improve economic conditions in the Evansville area. Small business lending was noted as a need in the community by both organizations. One contact recognized the opportunity for home improvement lending in local LMI areas, while the other organization’s representative identified a lack of affordable housing in nearby counties.

Demographic Information for Evansville IN-KY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	67	14.9	19.4	41.8	20.9	3.0
Population by Geography	267,867	9.5	17.4	41.7	31.3	0.2
Housing Units by Geography	119,357	10.6	19.6	41.4	28.1	0.3
Owner-Occupied Units by Geography	74,045	6.0	12.4	43.9	37.6	0.1
Occupied Rental Units by Geography	33,153	17.1	33.1	37.0	12.2	0.6
Vacant Units by Geography	12,159	21.0	26.1	38.1	14.1	0.6
Businesses by Geography	17,001	8.2	19.3	36.7	31.1	4.7
Farms by Geography	769	3.0	8.3	51.0	36.8	0.9
Family Distribution by Income Level	69,352	20.6	17.4	20.5	41.6	0.0
Household Distribution by Income Level	107,198	22.5	17.1	17.5	42.9	0.0
Median Family Income		\$61,595	Median Housing Value			\$120,546
			Median Gross Rent			\$710
			Families Below Poverty Level			10.6%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Indianapolis-Carmel-Anderson, IN MSA

The Indianapolis-Carmel-Anderson, IN MSA (Carmel MSA) is a single-state AA consisting of 39 CTs, encompassing all of Hamilton County. There are no low-income CTs, two moderate-income CTs, six middle-income CTs, and 31 upper-income CTs in the AA. UFB has one branch with a deposit-taking ATM located in an upper-income CT. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

Competition

Competition for deposits in the Indianapolis MSA AA is moderate. According to the June 30, 2019 FDIC Deposit Market Share Report, UFB's deposits in the AA totaled \$94.9 million, representing 12.8 percent of the bank's total deposits. UFB ranked 17 out of 27 deposit-taking institutions in the AA with a market share of 0.8 percent. The top five institutions for deposit market share in the AA were First Internet Bank, Merchants Bank, JPMorgan Chase, First Merchants Bank, and PNC Bank. These institutions accounted for 68.8 percent of deposits in the AA.

Competition for loans is strong. Based on 2019 aggregate mortgage data, 450 lenders originated or purchased residential real estate loans in the AA. The top five lenders were Caliber Home Loans Inc, JPMorgan Chase, Huntington National Bank, Wells Fargo Bank, and Ruoff Home Mortgage. These

lenders accounted for 22.6 percent of market share by number of loans originated. UFB ranked 239 out of the 450 lenders with 0.02 percent of market share.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate for the state of Indiana and Hamilton County improved during the review period. The annual unemployment rate for Hamilton County remained slightly below the state of Indiana’s unemployment rate. The table below summarizes the annual unemployment rate for the state and Hamilton County.

Unemployment Rates			
	2017	2018	2019
State of Indiana	3.6%	3.5%	3.3%
Hamilton County	2.8%	2.7%	2.5%

Source: Bureau of Labor Statistics

The leading industries in the area, according to the August 2020 Moody’s Analytics report, were professional and business services, education and health services, government, and leisure and hospitality services. These sectors accounted for 53.3 percent of total employment. The top five employers were Indiana University Health, St. Vincent Hospital & Health Services, Eli Lilly and Co, Community Health Network, and Walmart.

According to the 2015 ACS Census data, there were 80,098 families in the AA. Low-income families represented 8.6 percent of families in the AA, while moderate-income families represented 11.1 percent of families.

Housing

According to the 2015 ACS Census data, 74.6 percent of housing in the AA was owner-occupied, 20.6 percent was renter-occupied, and 4.8 percent was vacant. In moderate-income CTs, 38.5 percent of housing was owner-occupied, 48.4 percent was renter-occupied, and 13.1 percent was vacant. Moderate-income CTs accounted for 5.4 percent of multi-family housing units in the AA. The median age of the housing stock in the AA was 26 years, and the median housing value was \$228,525.

Community Contact

One community contact with an organization in the Indianapolis MSA was reviewed in conjunction with this evaluation. The organization serves the community through projects targeting underused areas in need of reinvestment. The contact identified a need for mixed-use, multi-family housing and developments in the AA.

Demographic Information for Indianapolis-Carmel-Anderson IN MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	5.1	15.4	79.5	0.0
Population by Geography	296,635	0.0	2.4	11.8	85.9	0.0
Housing Units by Geography	113,759	0.0	3.0	12.4	84.7	0.0
Owner-Occupied Units by Geography	84,806	0.0	1.5	11.5	87.0	0.0
Occupied Rental Units by Geography	23,447	0.0	6.9	14.3	78.7	0.0
Vacant Units by Geography	5,506	0.0	8.0	17.7	74.4	0.0
Businesses by Geography	31,229	0.0	5.6	8.1	86.3	0.0
Farms by Geography	831	0.0	4.0	21.3	74.7	0.0
Family Distribution by Income Level	80,098	8.6	11.1	15.9	64.3	0.0
Household Distribution by Income Level	108,253	10.5	10.7	14.1	64.7	0.0
Median Family Income		\$66,803	Median Housing Value			\$228,525
			Median Gross Rent			\$1,042
			Families Below Poverty Level			3.5%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Indiana

The bank has three AAs in the state of Indiana, the Evansville MSA AA, the Carmel MSA AA, and the IN non-MSA AA. Within the state, the Evansville AA accounts for 70.8 percent of deposits and 91.6 percent of loans by number. The Carmel MSA accounts for 25.6 percent of deposits and 5.6 percent of loans by number. The IN non-MSA accounts for 3.6 percent of deposits and 2.8 percent of loans by number. The Evansville MSA and the Carmel MSA AAs received full-scope reviews, while the IN non-MSA AA received limited-scope review. The Evansville MSA AA received the most weight in our analysis, followed by the Carmel MSA AA, and then the IN non-MSA AA. The table below shows the bank's lending in the AAs during the review period:

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Evansville MSA:			
Home Mortgage Loans	166	56.7%	11.3%
Business Loans	73	24.9%	88.0%
Farm Loans	2	0.7%	0.4%
Consumer Loans	52	17.7%	0.3%
Total Loans	293	100.00%	100.0%
Carmel MSA:			
Home Mortgage Loans	5	27.8%	7.1%
Business Loans	13	72.2%	92.9%
Farm Loans	0	0.0%	0.0%
Consumer Loans	0	0.0%	0.0%
Total Loans	18	100.00%	100.0%
Indiana non-MSA:			
Home Mortgage Loans	3	33.3%	70.2%
Business Loans	2	22.3%	16.2%
Farm Loans	0	0.0%	0.0%
Consumer Loans	4	44.4%	13.6%
Total Loans	9	100.0%	100.0%

Source: Internal Bank Loan Origination Report for 2017, 2018, and 2019

Primary products used in the geographic and borrower distribution analyses varied based on the AA. In the Evansville MSA AA, home mortgage loans and business loans are the bank's primary lending products. As noted above, home mortgage loans accounted for 11.3 percent of lending, by dollar volume, and business loans accounted for 88 percent of lending. The OCC used the bank's HMDA reportable loans for home mortgage data in this evaluation. For business loans, the OCC selected a random sample of 20 loans originated or purchased in the AA for the geographic and borrower distribution analysis. Home mortgage loans and business loans received equal weight in our analysis given the number and dollar volume of originations.

In the Carmel MSAAA, home mortgage loans are the bank's primary product. While it appears business loans should be a primary product, 11 of the 13 loans originated, totaling \$7.8 million, were to municipalities and are not considered CRA loans. Therefore, home mortgage loans only will be considered for this AA.

In the IN non-MSA AA, there were only nine loans originated during the evaluation period. We reviewed home mortgage and business loans in this AA. Home mortgage loans account for 70.2 percent of loans by dollar volume and business loans account for 16.2 percent of loans. Home mortgage loans received more weight in our analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

The bank's performance under the lending test in the state of Indiana is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Evansville MSA

The overall geographic distribution of home mortgage loans in the Evansville MSA AA is reasonable. The bank's lending in low-income CTs was within a reasonable range above the percentage of owner-occupied housing units and aggregate lending in those CTs. The bank's lending in moderate-income CTs was within a reasonable range above the percentage of owner-occupied housing units and aggregate lending in those CTs.

Carmel MSA

The overall geographic distribution of home mortgage loans in the Carmel MSA AA is reasonable. There are no low-income CTs in the AA and there are only two moderate-income CTs in the AA. While the bank made no loans in the two moderate-income CTs, only 1.5 percent of owner-occupied housing units are located in these two CTs and other lenders in the AA originated only 1.3 percent of loans in these CTs. Given the low number of moderate-income CTs and the level of competition in the area, 450 lenders competing for loans, UFB's lending is considered reasonable.

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.

Small Loans to Businesses

Evansville MSA

The overall geographic distribution of small business loans is reasonable. The bank's lending in low-income CTs was lower than the percentage of businesses and aggregate lending in those CTs. The bank did not make any loans in low-income CTs in the AA, based on our sample of 20 loans. The bank's lending in moderate-income CTs was within a reasonable range above the percentage of businesses and aggregate lending in those CTs.

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.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Evansville MSA

The overall borrower distribution of home mortgage loans in the Evansville MSA AA is reasonable. The bank's lending to low-income borrowers was within a reasonable range below the percentage of low-income families in the AA and was within a reasonable range above aggregate lending in the AA. The bank's lending to moderate-income borrowers significantly exceeded the percentage of moderate-income families and aggregate lending in the AA.

Carmel MSA

The overall borrower distribution of home mortgage loans in the Carmel MSA AA is reasonable. The bank's lending to low-income borrowers was within a reasonable range below the percentage of low-income families and was within a reasonable range above aggregate lending in the AA. The bank's lending to moderate-income borrowers was within a reasonable range below the percentage of moderate-income families and aggregate lending in the AA.

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

Small Loans to Businesses

Evansville MSA

The overall distribution of loans to businesses of different sizes is reasonable. The bank's lending was within a reasonable range below the percentage of small businesses and significantly exceeded aggregate lending. Of the loans sampled, 65 percent were to small 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 bank's originations and purchases of small loans to businesses.

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the IN non-MSA AA is weaker than the bank's overall performance under the lending test in the full-scope areas. There are no low- or moderate-income CTs in the AA, so a geographic analysis was not meaningful. The bank did not make any loans to low- or moderate-income borrowers in the AA. The bank made only two HMDA reportable loans in the AA during the review period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD test in the state of Indiana is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

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

Number and Amount of Community Development Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Evansville MSA	13	76.5	3,942	11.1
Carmel MSA	3	17.6	31,520	88.7
IN non-MSA	1	5.9	79	0.2
Total	17	100.0	35,541	100.0

Evansville MSA

The bank originated 13 CD loans, totaling \$3.9 million, in the Evansville MSA AA. These loans supported affordable housing, rental homes and small apartment buildings, located in LMI CTs or offering below market rate rents.

Carmel MSA

The bank originated three CD loans, totaling \$31.5 million, in the Carmel MSA AA. These loans promoted economic development by supporting the construction of a mixed-use building and an apartment complex in an area designated by local government for redevelopment. These buildings provide not only housing in the area but also provide space for small businesses.

Statewide/Regional

The bank also originated one CD loan, totaling \$10.7 million, within the state of Indiana, outside of its AAs. This loan supported affordable housing through the financing of a 200-unit apartment complex, which designates at least 51 percent of units to LMI tenants.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Evansville MSA	2	1,207	14	7	16	76.2	1,214	27.6	0	0
Carmel MSA	2	3,170	3	11	5	23.8	3,181	72.4	0	0
IN non-MSA	0	0	0	0	0	0.0	0	0.0	0	0
Total	4	4,377	17	18	21	100.0	4,395	100.0	0	0

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

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

Evansville MSA

The bank made 16 investments, totaling \$1.2 million, in the Evansville MSA AA. The two prior period investments, with a current book value of \$1.2 million, supported affordable housing in the AA. The 14 current period investments, totaling \$7,000, were in the form of donations. These donations supported organizations meeting the basic needs of LMI individuals, providing homeownership counseling, and providing support to LMI children.

Carmel MSA

The bank made five investments, totaling \$3.2 million, in the Carmel MSA AA. The two prior period investments, with a current book value of \$3.2 million, supported affordable housing in the AA. The three current period investments, totaling \$11,000, were in the form of donations. These donations supported organizations that advocate for affordable housing, provide service to LMI seniors, and help prevent homelessness.

Statewide/Regional

The bank made an additional 21 investments, totaling \$75.8 million, within the state of Indiana, but outside its AAs. Of these investments, 20 were prior period investments, totaling \$67.8 million, and one was a current period investment, totaling \$8 million. Both supported affordable housing within the state.

Extent to Which the Bank Provides Community Development Services

Evansville MSA

During the evaluation period, 36 employees performed 571 hours of CD services, supporting 15 organizations. These employees represent 39.1 percent of the employees in these branches. Employees served in a variety of roles for these organizations. They provided financial literacy classes, homeownership counseling, and assistance with fundraising activities. Three employees served in leadership roles at three different organizations, two serving on boards and one serving as the president of a local chapter of an organization.

Carmel MSA

During the evaluation period, one employee performed 208 hours of community service, supporting two organizations. This employee represents 20 percent of branch employees. The employee serves on the

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

board of one organization, which provides scholarships to students based on financial need. The other organization provides grants to LMI women and children.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the IN non-MSA AA is weaker than the bank's overall performance under the CD Test in the full scope areas. The bank did not make any investments in the AA, made only one CD loan totaling \$79,000, and employees performed 47 hours of CD services.

State Rating

State of Ohio

CRA rating for the State of Ohio: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels is reasonable.
- UFB's CD performance demonstrates excellent responsiveness to the CD needs of its AA through CD loans, qualified investments, and CD services.

Description of Institution's Operations in Ohio

Cincinnati, OH-KY-IN MSA

The Cincinnati, OH-KY-IN MSA (Cincinnati MSA) AA consists of 302 CTs, encompassing all of Hamilton and Butler counties. There are 52 low-income CTs, 74 moderate-income CTs, 90 middle-income CTs, and 80 upper-income CTs in the AA. UFB has one branch with a deposit-taking ATM located in an upper-income CT. There were also six CTs in the AA that did not receive an income classification. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs. The bank sold this branch on September 13, 2019.

Competition

Competition for deposits in the Cincinnati MSA AA is strong. According to the June 30, 2019 FDIC Deposit Market Share Report, UFB's deposits in the AA totaled \$19.2 million, representing 2.6 percent of the bank's total deposits. UFB ranked 35 out of 41 deposit-taking institutions in the AA with a market share of 0.02 percent. The top five institutions for deposit market share in the AA were US Bank, Fifth Third Bank, PNC Bank, First Financial Bank, and Huntington National Bank. These institutions accounted for 94.1 percent of deposits in the AA.

Competition for loans is also strong. Based on 2019 aggregate mortgage data, 469 lenders originated or purchased residential real estate loans in the AA. The top five lenders were Union Savings Bank, Fifth Third Bank, US Bank, Huntington National Bank, and Wells Fargo Bank. These lenders accounted for 29.7 percent of market share by number of loans originated. UFB ranked 270 out of the 469 lenders with 0.01 percent of market share.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate for the state of Ohio and Butler and Hamilton counties improved during the review period. The annual unemployment rate for the counties

remained slightly below the state of Ohio’s unemployment rate. The table below summarizes the annual unemployment rate for the state and counties.

Unemployment Rates			
	2017	2018	2019
State of Ohio	5.0%	4.5%	4.1%
Butler County	4.5%	4.1%	3.8%
Hamilton County	4.4%	4.1%	3.8%

Source: Bureau of Labor Statistics

The leading industries in the area, according to the August 2020 Moody’s Analytics report, were professional and business services, education and health services, government, and leisure and hospitality services. These sectors accounted for 53.7 percent of total employment. The top five employers were Cincinnati Children’s Hospital Medical Center, Kroger, Cincinnati International Airport, TriHealth Inc., and UC Health.

According to the 2015 ACS Census data, there were 287,431 families in the AA. Low-income families represented 24.9 percent of families in the AA, while moderate-income families represented 16.5 percent of families.

Housing

According to the 2015 ACS Census data, 54.5 percent of housing in the AA was owner-occupied, 34.1 percent was renter-occupied, and 11.4 percent was vacant. In low-income CTs in the AA, 21.3 percent of housing was owner-occupied, 55.3 percent was renter-occupied, and 23.4 percent was vacant. In moderate-income CTs, 42.5 percent of housing was owner-occupied, 44.9 percent was renter-occupied, and 12.6 percent was vacant. Low- and moderate-income CTs accounted for 50.2 percent of multi-family housing units in the AA. The median age of the housing stock in the AA was 55 years, and the median housing value was \$155,435.

Community Contact

One community contact with an organization in the Cincinnati MSA was reviewed in conjunction with this evaluation. The organization serves to revitalize local neighborhoods through homeownership programs targeting LMI families and LMI areas. The contact identified a need for lending products beyond the first mortgage, such as affordable rehabilitation and home repair loans.

Demographic Information for Cincinnati OH-KY-IN MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	302	17.2	24.5	29.8	26.5	2.0
Population by Geography	1,176,732	12.1	22.1	31.8	32.2	1.8
Housing Units by Geography	526,142	14.6	23.2	32.0	29.3	0.9
Owner-Occupied Units by Geography	286,694	5.7	18.1	36.1	39.9	0.2
Occupied Rental Units by Geography	179,664	23.7	30.5	27.1	17.1	1.6
Vacant Units by Geography	59,784	30.1	25.8	26.6	15.6	1.9
Businesses by Geography	81,345	9.6	21.0	28.3	39.6	1.5
Farms by Geography	1,803	5.3	16.4	41.8	36.2	0.3
Family Distribution by Income Level	287,431	24.9	16.5	18.7	39.9	0.0
Household Distribution by Income Level	466,358	28.4	15.7	16.3	39.6	0.0
Median Family Income		\$69,949	Median Housing Value			\$155,435
			Median Gross Rent			\$745
			Families Below Poverty Level			12.4%
<i>Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Ohio

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

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Home Mortgage Loans	26	92.9%	93.4%
Business Loans	2	7.1%	6.6%
Farm Loans	0	0.0%	0.0%
Consumer Loans	0	0.0%	0.0%
Total Loans	28	100.00%	100.0%

Source: Internal Bank Loan Origination Report for 2017, 2018, and 2019

Home mortgage loans are the bank's primary lending product in the AA. The bank originated and purchased 92.9 percent of residential real estate loans by number and 93.4 percent by dollar volume in

the AA during the evaluation period. The OCC used the bank's HMDA reportable loans for this evaluation.

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 Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Ohio is reasonable.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The overall geographic distribution of home mortgage loans is reasonable. The bank's lending in low-income CTs significantly exceeded the percentage of owner-occupied units and aggregate lending in those CTs. The bank's lending in moderate-income CTs also significantly exceeded the percentage of owner-occupied units and aggregate lending in those CTs. However, it should be noted that the bank originated or purchased only 24 loans in the AA over the three-year review period. UFB's lending resulted in six loans in low-income CTs and 10 loans in moderate-income CTs. Therefore, performance is considered reasonable.

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.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is reasonable. The bank's lending to low-income borrowers was within a reasonable range above the percentage of low-income families in the AA and significantly exceeded aggregate lending. The bank's lending to moderate-income borrowers was within a reasonable range above the percentage of moderate-income families and aggregate lending in the AA. Based on the low level of lending in the AA, this resulted in seven loans to low-income borrowers and five loans to moderate-income borrowers.

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

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD 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 exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's assessment area.

Number and Amount of Community Development Loans

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

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Cincinnati MSA	1	100.0	54	100.0

UFB originated one CD loan, totaling \$54,000, in the Cincinnati MSA AA. This loan supported affordable housing by financing an eight-unit apartment building in a low-income CT, which offers below market rate rents.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cincinnati MSA	3	29,033	1	13,072	4	100.0	42,105	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.

UFB made four investments, totaling \$42.1 million, in the Cincinnati MSA AA. Prior period investments accounted for three of these, with a current book value of \$29.0 million. These investments supported affordable housing in the AA. The current period investment, totaling \$13.1 million, also supported affordable housing. Additionally, the bank made four prior period investments, with a current

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

book value of \$38.3 million, and one current period investment, totaling \$2.8 million, within the state of Ohio, outside the bank's AA. These five investments, made on a statewide basis, all supported affordable housing.

Extent to Which the Bank Provides Community Development Services

The bank did not provide any CD services in the Cincinnati MSA AA during the evaluation period.

Territory Rating

Territory of the U. S. Virgin Islands

CRA rating for the Territory of the U.S. Virgin Islands: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- UFB's CD performance demonstrates excellent responsiveness to the CD needs of its AA through CD loans, qualified investments, and CD services.

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

St. Croix AA

The St. Croix AA encompasses the entire Island of St. Croix, located in the U.S. Virgin Islands. There are 16 total CTs in the AA: one low-income CT, four moderate-income CTs, seven middle-income CTs, and three upper-income CTs. There was also one CT in the AA that did not receive an income classification. All seven of the middle-income census tracts were listed as distressed, according to the FFIEC list of distressed or underserved areas, for all three years of the review period. These CTs were considered distressed due to poverty and unemployment. UFB has one branch with a deposit-taking ATM located in a moderate-income CT and one branch with a deposit-taking ATM located in a middle-income CT. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

Competition

Competition for deposits in the St. Croix AA is very low. According to the June 30, 2019 FDIC Deposit Market Share Report, UFB's deposits in the AA totaled \$245.7 million, representing 33.2 percent of the bank's total deposits. UFB ranked 3 out of 3 deposit-taking institutions in the AA with a market share of 30.5 percent. The top two institutions for deposit market share in the AA were FirstBank Puerto Rico and Banco Popular de Puerto Rico. These institutions accounted for the remaining 69.5 percent of deposits in the AA.

Competition for loans in the AA is unknown. Per HMDA guidelines, banks are not required to report loans originated or purchased in the U.S. Virgin Islands. Therefore, the OCC could not evaluate lending competition in the AA.

In 2018, there were 17 CRA reporting lenders that originated or purchased small business loans in the AA. Of those lenders, American Express, CitiBank, and Chase Bank had the largest market share, totaling 80.5 percent of the number of loans originated or purchased. UFB was not required to report small business loans originated or purchased.

Employment and Economic Factors

According to the U.S. Virgin Islands Department of Labor, the unemployment rate for the U.S. Virgin Islands and the Island of St. Croix continued to improve during the review period as the islands' economy and housing market recovered from the 2017 hurricanes and prior recession. The table below summarizes the annual unemployment rate for the U.S. Virgin Islands and Island of St. Croix.

Unemployment Rates			
	2017	2018	2019
U.S. Virgin Islands	11.8%	9.9%	6.1%
Island of St. Croix	11.8%	8.1%	5.5%

Source: Estimates from the U.S. Virgin Islands Department of Labor

The leading non-farm industries in the U.S. Virgin Islands, according to the August 2017 Bureau of Labor Statistics report, were government, leisure and hospitality services, and wholesale and retail trade. These sectors accounted for 66 percent of total employment. The top five employers were Government of U.S. Virgin Islands, U.S. Government, Frenchman's Reef & Morning Star Marriott Beach Resort, Gov. Juan F. Luis Hospital & Medical Center, and Kmart.

Housing

According to the 2015 ACS Census data, there were 19,765 households; 43.8 percent of housing in the AA was owner-occupied, 34.4 percent was renter-occupied, and 21.8 percent was vacant. In low-income CTs, 24.3 percent of housing was owner-occupied, 65.7 percent was renter-occupied, and 10 percent was vacant. In moderate-income CTs, 31.5 percent of housing was owner-occupied, 42.1 percent was renter occupied, and 26.4 percent was vacant.

Demographic Information for Island of St Croix AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	6.3	25.0	43.8	18.8	6.3
Population by Geography	50,601	4.4	31.7	42.6	21.3	0.0
Housing Units by Geography	25,275	3.5	34.5	38.5	23.5	0.0
Owner-Occupied Units by Geography	11,071	2.0	24.8	46.0	27.2	0.0
Occupied Rental Units by Geography	8,694	6.8	42.3	34.5	16.4	0.0
Vacant Units by Geography	5,510	1.6	41.8	29.5	27.1	0.0
Businesses by Geography	651	0.0	86.6	5.1	0.0	8.3
Farms by Geography	22	0.0	81.8	9.1	0.0	9.1
Family Distribution by Income Level	0	0.0	0.0	0.0	0.0	0.0
Household Distribution by Income Level	0	0.0	0.0	0.0	0.0	0.0
Median Family Income		\$45,058	Median Housing Value			\$0
			Median Gross Rent			\$0
			Families Below Poverty Level			0.0%

Source: 2015 ACS and 2019 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.

Scope of Evaluation in the U.S. Virgin Islands

The bank has only one AA in the U.S. Virgin Islands, the St. Croix AA. This AA received a full-scope review. The table below shows the bank's lending in the AA during the review period:

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Home Mortgage Loans	53	42.4%	54.1%
Business Loans	32	25.6%	43.6%
Farm Loans	0	0.0%	0.0%
Consumer Loans	40	32.0%	2.4%
Total Loans	125	100.00%	100.0%

Source: Internal Bank Loan Origination Report for 2017, 2018, and 2019

Home mortgage loans and business loans are the bank's primary lending products. Home mortgage loans accounted for 54.1 percent of lending, by dollar volume, and business loans accounted for 43.6 percent of lending. For home mortgage loans, the OCC selected a random sample of 25 loans, as the bank is not required to report home mortgage loans originated or purchased in the U.S. Virgin Islands. For business loans, the OCC selected a random sample of 20 loans originated or purchased in the AA for the geographic and borrower distribution analysis. Home mortgage loans was weighted more heavily given the number and dollar volume of originations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN U.S. VIRGIN ISLANDS

LENDING TEST

The bank's performance under the Lending Test in the U.S. Virgin Islands is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the U.S. Virgin Islands is reasonable.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The overall geographic distribution of home mortgage loans is excellent. Based on HMDA reporting requirements, banks are not required to report loans originated and purchased in the U.S. Virgin Islands.

Therefore, aggregate lending data is not available, and the only comparative factor is the percent of owner-occupied housing units in the CTs. For our analysis, the OCC sampled 25 home mortgage loans. The bank's lending in low-income CTs was within a reasonable range above the percentage of owner-occupied housing units in those CTs. The bank's lending in moderate-income CTs was also within a reasonable range above the percentage of owner-occupied housing units in those CTs.

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

Small Loans to Businesses

The overall geographic distribution of small business loans is reasonable. There is only one low-income CT in the AA and there are no businesses located in that CT. Therefore, the bank made no small loans to businesses in the low-income CT. The bank's lending in moderate-income CTs is within a reasonable range below the percentage of businesses and aggregate lending in those CTs.

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

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is reasonable. There are no comparators for borrower distribution in St. Croix, as lenders are not required to report home mortgage loans and census data does not include the percent of LMI families. However, the OCC did analyze a sample of loans originated and purchased by UFB and found that the bank made two loans to moderate-income borrowers in the AA. The bank did not make any loans to low-income borrowers. Without sufficient census data, the OCC could not determine the affordability of housing in the area. However, the OCC can assume with a median family income of \$45,058 and the cost of real estate on most islands, that purchasing homes on the island may be out of range for LMI borrowers. Additionally, of the occupied housing units on the island, 44 percent are rental occupied units. Based on this information, the OCC determined that the borrower distribution of loans is reasonable.

Refer to Table P in the U.S. Virgin Islands section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Small Loans to Businesses

The overall distribution of loans to businesses of different sizes is reasonable. The bank's lending was within a reasonable range below the percentage of small businesses and was within a reasonable range above aggregate lending. Of the loans sampled, 55 percent were to small businesses.

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

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD test in the U.S. Virgin Islands is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
St. Croix	8	100.0	9,487	100.0

UFB originated eight CD loans, totaling \$9.5 million, in the St. Croix AA. These loans helped to revitalize and stabilize distressed middle-income CTs by financing businesses in these CTs. These loans also supported job retention in the area.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
St. Croix	0	0	15	39	15	100.0	39	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.

UFB made 15 investments, totaling \$39,000, in the St. Croix AA. All 15 investments were in the form of donations. A variety of organizations were helped through these donations, many of which required additional support in the wake of the hurricanes that hit the island. Five of these donations were given through UFB Disaster Relief Grants directly to families that were impacted by Hurricane Maria. Other

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

donations supported organizations who provide funding to non-profit organizations, services to LMI individuals, and support housing for the most vulnerable on the island.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, two employees provided 132 hours of CD services to two organizations. These employees represent 10.0 percent of employees at the branches in this AA. One employee serves on the board of an organization that supports the recovery and job growth of businesses on the island, particularly after a disaster such as Hurricane Maria. The other employee taught financial literacy classes for an organization. Additionally, one of the branches is located in a moderate-income CT and the other is located in a distressed middle-income CT.

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 MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	Lending Test (excludes CD loans): 01/01/2017 to 12/31/2019 Community Development Test: 11/28/2017 to 12/31/2019	
Bank Products Reviewed:	Home Mortgage and Small Business Loans Community Development Loans, Qualified Investments, and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Village Capital Corporation	Wholly Owned Subsidiary	Commercial Loans
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Colorado MSA #19740 Denver-Aurora-Lakewood, CO	Full-Scope	Arapahoe, Denver, and Jefferson Counties
Florida MSA #15980 Cape Coral-Ft. Myers, FL	Full-Scope	Lee County
Illinois IL Non-MSA MSA #16794 Chicago-Naperville-Evanston, IL	Full-Scope	Effingham and Fayette Counties Portion of Cook County
Indiana MSA #21780 Evansville, IN-KY Indianapolis-Carmel-Anderson, IN	Full-Scope	Posey, Vanderburgh, and Warrick Counties Hamilton County
IN Non-MSA	Limited-Scope	Gibson County
Ohio MSA #17140 Cincinnati, OH-KY-IN	Full-Scope	Butler and Hamilton Counties
U.S. Virgin Islands Island of St. Croix	Full-Scope	Entire Island of St. Croix

Appendix B: Summary of MMSA and State Ratings

RATINGS United Fidelity Bank, F.S.B.			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
United Fidelity Bank, FSB	Satisfactory	Outstanding	Satisfactory
State:			
Colorado	Outstanding	Outstanding	Outstanding
Florida	Satisfactory	Outstanding	Satisfactory
Illinois	Satisfactory	Outstanding	Satisfactory
Indiana	Satisfactory	Outstanding	Satisfactory
Ohio	Satisfactory	Outstanding	Satisfactory
U.S. Virgin Islands	Satisfactory	Outstanding	Satisfactory

(*) The Lending Test and CD Test carry equal weight 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 LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

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

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

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

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

COLORADO

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Denver MSA	87	38,964	100.0	128,020	5.4	8.0	5.9	18.9	58.6	20.0	36.7	27.6	36.6	39.0	5.7	37.5	0.0	0.0	0.0	
Total	87	38,964	100.0	128,020	5.4	8.0	5.9	18.9	58.6	20.0	36.7	27.6	36.6	39.0	5.7	37.5	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-19	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Denver MSA	87	38,964	100.0	128,020	22.9	24.1	6.1	17.9	60.9	18.9	19.9	10.3	22.4	39.3	1.1	37.1	0.0	3.4	15.5	
Total	87	38,964	100.0	128,020	22.9	24.1	6.1	17.9	60.9	18.9	19.9	10.3	22.4	39.3	1.1	37.1	0.0	3.4	15.5	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

FLORIDA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-19	
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		
Fort Myers MSA	18	11,843	100.0	34,056	2.1	0.0	1.7	18.6	38.9	19.1	44.2	33.3	45.4	35.1	27.8	33.7	0.0	0.0	0.1		
Total	18	11,843	100.0	34,056	2.1	0.0	1.7	18.6	38.9	19.1	44.2	33.3	45.4	35.1	27.8	33.7	0.0	0.0	0.1		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-19	
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		
Fort Myers MSA	18	11,843	100.0	34,056	20.7	0.0	4.5	18.5	44.4	16.5	19.7	5.6	20.9	41.1	16.7	42.5	0.0	33.3	15.6		
Total	18	11,843	100.0	34,056	20.7	0.0	4.5	18.5	44.4	16.5	19.7	5.6	20.9	41.1	16.7	42.5	0.0	33.3	15.6		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

ILLINOIS

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-19	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Chicago MSA	39	5,027	68.4	91,909	11.7	25.6	9.2	32.1	56.4	26.1	28.8	12.8	26.4	27.1	5.1	38.0	0.3	0.0	0.3		
IL Non-MSA	18	1,923	31.6	1,071	0.0	0.0	0.0	12.1	44.4	10.6	51.3	16.7	47.0	36.6	38.9	42.4	0.0	0.0	0.0		
Total	57	6,950	100.0	92,980	11.4	17.5	9.1	31.6	52.6	26.0	29.4	14.0	26.7	27.4	15.8	38.1	0.3	0.0	0.3		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-19	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Chicago MSA	39	5,027	68.4	91,909	34.0	28.2	5.2	17.9	33.3	14.9	16.7	17.9	20.0	31.3	7.7	42.2	0.0	12.8	17.8		
IL Non-MSA	18	1,923	31.6	1,071	19.3	33.3	7.8	17.6	27.8	17.7	21.7	22.2	24.2	41.4	16.7	35.5	0.0	0.0	14.8		
Total	57	6,950	100.0	92,980	33.7	29.8	5.2	17.9	31.6	14.9	16.8	19.3	20.0	31.5	10.5	42.1	0.0	8.8	17.7		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-19	
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 MSA	16	2,202	100.0	70,484	11.0	18.8	9.6	22.7	81.3	25.0	20.4	0.0	22.3	45.0	0.0	42.6	1.0	0.0	0.5	
Total	16	2,202	100.0	70,484	11.0	18.8	9.6	22.7	81.3	25.0	20.4	0.0	22.3	45.0	0.0	42.6	1.0	0.0	0.5	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 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												2017-19	
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 MSA	16	2,202	100.0	70,484	84.4	68.8	44.4	6.2	31.3	9.4	0.0		
Total	16	2,202	100.0	70,484	84.4	68.8	44.4	6.2	31.3	9.4	0.0		

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 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																			2017-19	
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	20	2,922	100.0	115	0.0	0.0	0.0	10.9	20.0	12.2	45.3	30.0	61.7	43.8	50.0	26.1	0.0	--	0.0	
Total	20	2,922	100.0	115	0.0	0.0	0.0	10.9	20.0	12.2	45.3	30.0	61.7	43.8	50.0	26.1	0.0	--	0.0	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 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											2017-19	
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	20	2,922	100.0	115	97.1	100.0	60.0	2.1	0.0	0.9	0.0	
Total	20	2,922	100.0	115	97.1	100.0	60.0	2.1	0.0	0.9	0.0	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

INDIANA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Evansville MSA	78	9,047	70.9	10,363	6.0	11.5	3.3	12.4	17.9	12.3	43.9	47.4	40.9	37.6	23.1	43.3	0.1	0.0	0.1	
Carmel MSA	30	23,210	27.3	21,704	0.0	0.0	0.0	1.5	0.0	1.3	11.5	3.3	10.3	87.0	96.7	88.4	0.0	0.0	0.0	
IN Non-MSA	2	199	1.8	1,052	0.0	0.0	0.0	0.0	0.0	0.0	74.4	50.0	68.2	25.6	50.0	31.8	0.0	0.0	0.0	
Total	110	32,456	100.0	33,119	2.6	8.2	1.0	6.2	12.7	4.7	29.5	35.5	21.7	61.7	43.6	72.5	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Evansville MSA	78	9,047	70.9	10,363	20.6	11.5	8.9	17.4	37.2	20.7	20.5	5.1	21.0	41.6	24.4	31.5	0.0	21.8	17.9	
Carmel MSA	30	22,503	78.9	21,704	8.6	6.7	3.4	11.1	6.7	11.7	15.9	3.3	19.1	64.3	76.7	53.1	0.0	6.7	12.6	
IN Non-MSA	2	199	2.5	1,052	15.2	0.0	8.4	18.8	0.0	22.3	21.1	0.0	24.7	44.8	0.0	32.7	0.0	100.0	11.9	
Total	110	32,456	100.0	33,119	14.3	10.0	5.3	14.3	28.2	14.9	18.2	4.5	19.9	53.3	38.2	45.7	0.0	19.1	14.2	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-19	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Evansville MSA	20	4,741	100.0	3,678	8.2	0.0	8.6	19.3	22.2	19.0	36.7	50.0	35.0	31.1	27.8	32.6	4.7	0.0	4.8	
Total	20	4,741	100.0	3,678	8.2	0.0	8.6	19.3	22.2	19.0	36.7	50.0	35.0	31.1	27.8	32.6	4.7	0.0	4.8	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 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												2017-19	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Evansville MSA	20	4,741	100.0	3,678	80.0	65.0	41.6	6.8	35.0	13.2	0.0		
Total	20	4,741	100.0	3,678	80.0	65.0	41.6	6.8	35.0	13.2	0.0		

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

OHIO

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19	
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 MSA	24	3,536	100.0	42,297	5.7	25.0	4.6	18.1	41.7	15.5	36.1	29.2	35.3	39.9	4.2	44.3	0.2	0.0	0.3	
Total	24	3,536	100.0	42,297	5.7	25.0	4.6	18.1	41.7	15.5	36.1	29.2	35.3	39.9	4.2	44.3	0.2	0.0	0.3	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-19	
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 MSA	24	3,536	184.6	42,297	24.9	29.2	8.2	16.5	20.8	18.5	18.7	16.7	20.1	39.9	12.5	37.9	0.0	20.8	15.2	
Total	24	3,536	184.6	42,297	24.9	29.2	8.2	16.5	20.8	18.5	18.7	16.7	20.1	39.9	12.5	37.9	0.0	20.8	15.2	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

U.S. VIRGIN ISLANDS

Note: Geographic Distribution and Borrower Distribution tables for home mortgage loans do not include aggregate information, as banks are not required to report these originations and purchases in U.S. territories.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
St. Croix AA	25	8,080	100.0	0	2.0	4.0	0.0	24.8	36.0	0.0	46.0	8.0	0.0	27.2	52.0	0.0	0.0	0.0	0.0	
Total	25	8,080	100.0	0	2.0	4.0	0.0	24.8	36.0	0.0	46.0	8.0	0.0	27.2	52.0	0.0	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-19	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
St. Croix AA	25	8,080	100.0	0	0.0	0.0	0.0	0.0	8.0	0.0	0.0	12.0	0.0	0.0	68.0	0.0	0.0	12.0	0.0	
Total	25	8,080	100.0	0	0.0	0.0	0.0	0.0	8.0	0.0	0.0	12.0	0.0	0.0	68.0	0.0	0.0	12.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-19	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
St. Croix AA	20	4,973	100.0	137	0.0	0.0	0.7	86.6	50.0	65.7	5.1	30.0	19.7	0.0	20.0	11.7	8.3	0.0	2.2	
Total	20	4,973	100.0	137	0.0	0.0	0.7	86.6	50.0	65.7	5.1	30.0	19.7	0.0	20.0	11.7	8.3	0.0	2.2	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 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												2017-19	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
St. Croix AA	20	4,973	100.0	137	74.5	55.0	49.6	10.6	30.0	14.9	15.0		
Total	20	4,973	100.0	137	74.5	55.0	49.6	10.6	45.0	14.9	15.0		

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*