

# **PUBLIC DISCLOSURE**

November 6, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First Farmers Bank and Trust  
RSSD# 139843

123 North Jefferson Street  
Converse, Indiana 46919

Federal Reserve Bank of Chicago

230 South LaSalle Street  
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

## TABLE OF CONTENTS

<b>PERFORMANCE EVALUATION .....</b>	<b>2</b>
<b>INSTITUTION'S CRA RATING.....</b>	<b>2</b>
FIRST FARMERS BANK AND TRUST'S OVERALL CRA RATING: SATISFACTORY .....	2
PERFORMANCE TEST RATING TABLE .....	2
SUMMARY OF MAJOR FACTORS THAT SUPPORT THE RATING.....	2
<b>FIRST FARMERS BANK AND TRUST .....</b>	<b>4</b>
DESCRIPTION OF INSTITUTION .....	4
<b>SCOPE OF THE EXAMINATION.....</b>	<b>6</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA .....</b>	<b>8</b>
LENDING TEST .....	8
INVESTMENT TEST.....	11
SERVICE TEST .....	13
<b>FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....</b>	<b>15</b>
<b>STATE OF INDIANA.....</b>	<b>16</b>
DESCRIPTION OF INSTITUTION'S OPERATIONS IN INDIANA.....	17
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA .....	17
<b>INDIANA NON-MSA - FULL REVIEW .....</b>	<b>23</b>
DESCRIPTION OF INSTITUTION'S OPERATIONS IN INDIANA NON-MSA .....	23
<b>KOKOMO, IN MSA – FULL REVIEW .....</b>	<b>44</b>
<b>TERRE HAUTE, IN MSA – FULL REVIEW .....</b>	<b>64</b>
<b>INDIANAPOLIS, IN MSA – LIMITED REVIEW .....</b>	<b>83</b>
DESCRIPTION OF INSTITUTION'S OPERATIONS IN INDIANAPOLIS, IN MSA .....	83
<b>LAFAYETTE, IN MSA – LIMITED REVIEW.....</b>	<b>93</b>
DESCRIPTION OF INSTITUTION'S OPERATIONS LAFAYETTE, IN MSA .....	93
<b>STATE OF ILLINOIS .....</b>	<b>103</b>
DESCRIPTION OF INSTITUTION'S OPERATIONS IN ILLINOIS.....	104
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS .....	104
<b>DANVILLE, IL MSA – FULL REVIEW .....</b>	<b>107</b>
<b>ILLINOIS NON-MSA – LIMITED REVIEW.....</b>	<b>125</b>
DESCRIPTION OF INSTITUTION'S OPERATIONS IN ILLINOIS NON-MSA .....	125
<b>APPENDIX A – MAP OF ASSESSMENT AREAS .....</b>	<b>135</b>
<b>APPENDIX B – DEMOGRAPHIC AND LENDING CHARTS .....</b>	<b>136</b>
<b>APPENDIX C – SCOPE OF EXAMINATION .....</b>	<b>172</b>
<b>APPENDIX D – GLOSSARY.....</b>	<b>174</b>

## INSTITUTION'S CRA RATING

**First Farmers Bank and Trust's Overall CRA Rating:** Satisfactory

### Performance Test Rating Table

The following table indicates the performance level of First Farmers Bank and Trust with respect to the lending, investment, and service test.

First Farmers Bank and Trust			
Performance Levels	Performance Tests		
	Lending Test	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	✓	✓	✓
Needs to Improve			
Substantial Noncompliance			

*\* Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating*

### Summary of Major Factors that Support the Rating

#### Lending Test:

- Lending levels reflect good responsiveness to assessment area credit needs;
- A high percentage of loans were in the bank's assessment area;
- The geographic distribution of loans reflects adequate penetration throughout the assessment area;
- The distribution of borrowers reflects, given the product lines offered, adequate penetration among customers of different income levels and businesses (including farms) of different sizes;

- The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms;
- The bank makes an adequate level of community development loans; and
- Makes limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

**Investment Test:**

- The bank makes an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position;
- Makes occasional use of innovative and/or complex investments to support community development initiatives; and
- Exhibits adequate responsiveness to credit and community development needs.

**Service Test:**

- Delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment areas;
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals;
- Services do not vary in a way that inconveniences its assessment areas, particularly low- or moderate-income geographies or low- or moderate-income individuals; and
- The bank provides a limited level of community development services.

## FIRST FARMERS BANK AND TRUST

### DESCRIPTION OF INSTITUTION

First Farmers Bank and Trust (FFBT), with total assets of \$2.8 billion as of June 30, 2023, is the sole banking subsidiary of First Farmers Financial Corporation, with both the bank and holding company located in Converse, Indiana. The bank operates from 35 locations, including its main office in Converse, Indiana. Additionally, FFBT maintains 58 automated teller machines (ATMs), including 37 interactive teller machines (ITMs), which allows customers to interact with a live teller via video. The bank began installing ITMs at multiple branch locations starting in May of 2022 to alleviate branch staffing issues and to extend the availability of services. No branches were opened or closed since the previous CRA evaluation however, the bank did open a Loan Production Office (LPO) in a middle-income census tract in Carmel, Indiana on December 1, 2022.

FFBT offers a variety of loan products, including commercial, residential real estate, agricultural, and secured/unsecured consumer loans. The bank is primarily a commercial lender with 60.2 percent of the loan portfolio consisting of commercial loans as of June 30, 2023, followed by agricultural loans at 27.9 percent, residential real estate loans at 5.0 percent, other loans at 3.7 percent, and consumer loans at 3.2 percent. Details relative to the composition of the bank's loan portfolio are outlined in the following table.

Loan Portfolio Composition as of June 30, 2023		
Loan Type	(\$ in 000s)	% of Portfolio
Commercial	1,292,821	60.2
Agricultural	599,903	27.9
Residential Real Estate	107,222	5.0
Other	79,297	3.7
Consumer	70,202	3.2
Total	2,149,445	100.0
<i>Note: Percentages may not total to 100.0 percent due to rounding.</i>		

In addition, the bank participates in various federal, and state government-assisted loan programs tailored to meet the needs of families with low- or moderate-incomes, small businesses, and small farms. These programs consist of loans such as the Small Business Administration (SBA), Farm Service Agency (FSA), the Federal Home Loan Homeownership Opportunities Program (FHLB HOP), as well as an in-house credit builder program to help applicants improve their credit scores.

The bank provides standard deposit products in the form of checking, savings, money market, and certificate of deposit accounts. In addition to its branches and ATMs, the bank's

delivery channels also include mobile and internet banking, remote deposit capture, and ITMs in select markets to further enhance access to live tellers via video interaction.

Consistent with its most recent CRA evaluation, FFBT is an interstate bank operating in seven assessment areas in Indiana and Illinois:

- Indiana Non-MSA, consisting of Cass, Clinton, Fulton, Grant, Huntington, Miami, Pulaski, Starke, Tipton, Wabash, and a portion of Marshall County;
- Kokomo, IN MSA #29020 consisting of Howard County;
- Terre Haute, IN MSA #45460 consisting of Clay, Sullivan, Vermillion and Vigo Counties;
- Indianapolis-Carmel-Anderson, IN MSA #26900 consisting of Boone, Hamilton, and Madison Counties;
- Lafayette-West Lafayette, IN MSA #29200 consisting of Carroll and Tippecanoe Counties;
- Danville, IL MSA #19180 consisting of Vermilion County; and
- Illinois Non-MSA, consisting of Clark, Coles, Douglas and Edgar Counties.

The following table provides a breakdown of the bank's branch offices by census tract income level:

Distribution of Branches by Assessment Area and Census Tract Income Designation										
Assessment Area	Low-Income		Moderate-Income		Middle-Income		Upper-Income		Total	
	#	% of Total	#	% of Total	#	% of Total	#	% of Total	#	% of Total
Indiana Non-MSA	0	0.0	5	14.3	7	20.0	2	5.7	14	40.0
Kokomo, IN MSA	1	2.9	2	5.7	1	2.9	2	5.7	6	17.1
Terre Haute, IN MSA	0	0.0	0	0.0	4	11.4	1	2.9	5	14.3
Indianapolis-Carmel-Anderson, IN MSA	0	0.0	0	0.0	3	8.6	0	0.0	3	8.6
Lafayette-West Lafayette, IN MSA	1	2.9	0	0.0	1	2.9	0	0.0	2	5.7
Danville, IL MSA	0	0.0	0	0.0	0	0.0	2	5.7	2	5.7
Illinois Non-MSA	0	0.0	0	0.0	3	8.6	0	0.0	3	8.6
<b>Total</b>	<b>2</b>	<b>5.7</b>	<b>7</b>	<b>20.0</b>	<b>19</b>	<b>54.3</b>	<b>7</b>	<b>20.0</b>	<b>35</b>	<b>100.0</b>

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

At its previous evaluation conducted on September 20, 2021, the bank was rated **Satisfactory** under the CRA.

## SCOPE OF THE EXAMINATION

FFBT's CRA performance was evaluated using the Federal Financial Institution Examination Councils (FFIEC) Large Institution CRA Examination Procedures. The CRA performance evaluation assesses the bank's responsiveness and effectiveness in meeting the credit and community development needs in the assessment area. The bank's performance was evaluated within the context of the institution's asset size and financial condition, market presence of other financial institutions, the combined record of aggregate lenders in each assessment area, and economic and demographic characteristics.

The bank delineates seven assessment areas, including four Metropolitan Statistical Areas (MSAs) and one non-MSA located in the state of Indiana, and one MSA and one Non-MSA in the state of Illinois. Assessment areas reviewed for full scope evaluations were selected based on the branch distribution, percentage of total deposits, and distribution of loans. The bank's operations, as well as deposits and lending activity, are predominantly located in the Indiana Non-MSA assessment area, thus, the performance in the Indiana Non-MSA carried the greatest weight in the analysis and overall performance conclusions. The following presents the full- and limited-scope review assessment areas selected as part of the current evaluation.

Assessment Areas	Designation
<b>Full Scope</b>	
Indiana Non-MSA	Indiana Non-MSA
Kokomo, IN MSA #29020	Kokomo, IN MSA
Terre Haute, IN MSA #45460	Terre Haute, IN MSA
Danville, IL MSA #19180	Danville, IL MSA
<b>Limited Scope Review</b>	
Illinois Non-MSA	Illinois Non-MSA
Indianapolis-Carmel-Anderson, IN MSA #26900	Indianapolis, IN MSA
Lafayette-West Lafayette, IN MSA #29200	Lafayette, IN MSA

The lending analysis was based primarily on the bank's 2022 Home Mortgage Disclosure Act (HMDA)-reportable and 2021 CRA-reportable loans. Please refer to Appendix B for 2021 HMDA-reportable loan tables and 2022 CRA-reportable loan tables (small business and small farm loans).

This evaluation places equal emphasis on HMDA-reportable and CRA-reportable loans. For HMDA-reportable lending, 2022 lending figures will be the primary basis to evaluate the bank's performance, while 2021 figures were used for comparison purposes. For CRA-reportable lending, 2021 lending figures will be the primary basis to evaluate the bank's performance, while 2022 figures were used for comparison purposes. These timeframes are based on the availability of aggregate lending data. The full scope review assessment areas of the Indiana Non-MSA; Kokomo, IN MSA; Terre Haute, IN MSA; and the Danville, IL MSA are the only assessment areas given consideration when assessing the bank's ratings.

Assessment areas under limited review were evaluated for consistency with the bank's overall performance.

Performance within all assessment areas was evaluated using the following performance standards:

- ***Level of Lending Activity:*** The bank's HMDA-reportable and CRA-reportable loans, originated from January 1, 2021 through December 31, 2022, were reviewed to determine the responsiveness to credit needs in the assessment areas.
- ***Lending in the Assessment Area:*** HMDA-reportable and CRA-reportable loans, originated from January 1, 2021 through December 31, 2022, were analyzed to determine the percentage of loans originated in the bank's combined assessment area.
- ***Geographic Distribution of Lending in the Assessment Area:*** HMDA-reportable and CRA-reportable loans, originated from January 1, 2021 through December 31, 2022, were analyzed to determine the extent to which the bank is lending in census tracts of different income levels, particularly those designated as low- or moderate-income.
- ***Lending to Borrowers of Different Incomes and to Businesses and Farms of Different Sizes:*** HMDA-reportable and CRA-reportable loans originated from January 1, 2021 through December 31, 2022, were analyzed to determine the distribution among borrowers of different income levels, particularly low- or moderate-income borrowers, and to businesses and farms of different revenue sizes.
- ***Community Development Lending:*** The number, dollar volume, innovativeness and complexity of community development loans originated from September 21, 2021 through November 6, 2023, were reviewed.
- ***Innovative or Flexible Lending Practices:*** The degree to which the bank uses innovative and flexible lending practices to address the credit needs of low- and moderate-income individuals or geographies and small businesses and farms was assessed.
- ***Investments:*** Qualified investments and grants from September 21, 2021 through November 6, 2023, were reviewed to determine the bank's responsiveness to community development needs. In addition, outstanding qualified investments made prior to September 21, 2021 were also considered. Qualified investments were also evaluated to determine the bank's use of innovative or complex investments.
- ***Services:*** The distribution of the bank's branch offices, banking services, hours of operation, availability of loan and deposit products, and the extent and



innovativeness of community development services from September 21, 2021 through November 6, 2023, were reviewed.

In addition, six community representatives were contacted in connection with this examination to provide information regarding local economic and socio-economic conditions in the assessment areas. Refer to individual assessment area summaries for community representative information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

### **LENDING TEST**

FFBT's performance relative to the lending test is rated low satisfactory. Factors contributing to the rating include: lending activity reflects good responsiveness to assessment area credit needs; a high percentage of loans were originated in the bank's assessment area; loans reflect an adequate geographic distribution throughout the bank's assessment area, including low- and moderate-income geographies; the bank demonstrates an adequate distribution of loans among individuals of different income levels and businesses (including farms) of different revenue sizes; the bank makes limited use of innovative and/or flexible lending practices to address the credit needs of low- or moderate-income individuals or geographies; the bank has good responsiveness to credit and community development needs; and the bank makes an adequate level of community development loans.

The bank continues to participate in various federal and state government-assisted loan programs tailored to meet the needs of families with low- or moderate-incomes, small businesses, and small farms. These programs consist of loans such as the Small Business Administration (SBA), Farm Service Agency (FSA), the Federal Home Loan Homeownership Opportunities Program (FHLB HOP), as well as an in-house credit builder program to help applicants improve their credit scores.

#### **Level of Lending Activity**

FFBT's lending levels reflect good responsiveness to credit needs in its assessment area, taking into account the number and amount of home mortgage, small business, and small farm loans extended in 2021 and 2022. The bank originated 4,189 HMDA- and CRA-reportable loans during the review period totaling approximately \$700.0 million. This was a significant increase from the previous evaluation, in which the bank originated 3,323 total loans, including HMDA-reportable loans in 2019 and 2020, and CRA-reportable loans in 2019 which totaled approximately \$549.0 million. The bank experienced an increase (29.5 percent by number) in HMDA-related lending relative to the previous evaluation. Small business lending and small farm lending experienced an increase in volume of 26.5 percent and 19.6 percent respectively. This was largely driven by the difference in the scope between the last evaluation period and this evaluation period. During the last evaluation period, one year of CRA-reportable loan data was analyzed while two years of

reportable loan data was analyzed during this evaluation period.

The following table presents the bank's level of lending activity across the combined assessment area during the review period:

Summary of Lending Activity January 1, 2021 – December 31, 2022				
Loan Type	#	%	\$(000s)	%
Home Improvement	178	4.2	11,167	1.6
Home Purchase	724	17.3	138,465	19.8
Multi-Family Housing	29	0.7	53,440	7.6
Refinancing	1,354	32.3	159,148	22.7
<b>Total HMDA Reportable</b>	<b>2,285</b>	<b>54.5</b>	<b>362,220</b>	<b>51.8</b>
<b>Total Small Business Reportable</b>	<b>726</b>	<b>17.3</b>	<b>142,449</b>	<b>20.4</b>
<b>Total Small Farm Reportable</b>	<b>1,178</b>	<b>28.1</b>	<b>195,093</b>	<b>27.9</b>
<b>Total Loans</b>	<b>4,189</b>	<b>100</b>	<b>699,762</b>	<b>100</b>
<i>Note: Percentages may not total to 100.0 percent due to rounding.</i>				

### Assessment Area Concentration

FFBT made a high percentage of loans in its assessment area. The bank originated 89.2 percent of its HMDA-reportable loans by number and 74.0 percent by dollar volume of these loans within the bank's combined assessment areas. Small business loans originated in the bank's assessment areas represented 85.1 percent of all small business loan originations by number and 79.5 percent by dollar amount. Lastly, small farm loans originated in the assessment area was comparable to small business loans at 78.7 percent by number and 77.4 percent by dollar amount. Overall, the level of lending inside the assessment area of 85.6 percent is consistent with the bank's previous performance evaluation dated September 20, 2021.

The following table summarizes the bank's lending inside and outside its assessment areas for HMDA-reportable and CRA-reportable (small business and small farm) loans from January 1, 2021, through December 31, 2022.

Lending In and Out of the Assessment Area January 1, 2021 – December 31, 2022								
Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	163	91.6	9,204	82.4	15	8.4	1,963	17.6
Home Purchase – Conventional	617	85.2	102,775	74.2	107	14.8	35,690	25.8
Multi-Family Housing	20	69.0	18,164	34.0	9	31.0	35,276	66.0
Refinancing	1,239	91.5	137,925	86.7	115	8.5	21,223	13.3
<b>Total HMDA Reportable</b>	<b>2,039</b>	<b>89.2</b>	<b>268,068</b>	<b>74.0</b>	<b>246</b>	<b>10.8</b>	<b>94,152</b>	<b>26.0</b>
<b>Total Small Business Reportable</b>	<b>618</b>	<b>85.1</b>	<b>113,269</b>	<b>79.5</b>	<b>108</b>	<b>14.9</b>	<b>29,180</b>	<b>20.5</b>
<b>Total Small Farm Reportable</b>	<b>927</b>	<b>78.7</b>	<b>150,970</b>	<b>77.4</b>	<b>251</b>	<b>21.3</b>	<b>44,123</b>	<b>22.6</b>
<b>Total Loans</b>	<b>3,584</b>	<b>85.6</b>	<b>532,307</b>	<b>76.1</b>	<b>605</b>	<b>14.4</b>	<b>167,455</b>	<b>23.9</b>
<i>Note: Percentages may not add up to 100.0 due to rounding.</i>								

## Geographic and Borrower Distribution

FFBT's lending activities reflect adequate distribution throughout the assessment area. A high percentage of loans were made in the bank's assessment area and reflect adequate penetration throughout, including low- and moderate-income geographies. In addition, the distribution of loans reflects adequate penetration to borrowers of different income levels and business and farms of different revenue sizes. Please refer to the state and individual assessment area summaries for further detail.

FFBT exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment areas, low-income individuals, or businesses (including farms) with gross annual revenues of \$1 million or less, consistent with safe and sound operations. Lastly, the bank makes limited use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- or moderate-income individuals or geographies.

## Community Development Lending

FFBT makes an adequate level of community development loans. The bank made nine loans totaling approximately \$42.2 million, which represents an 88.5 percent decrease by number and 43.5 percent decrease by dollar from the previous evaluation. The decrease is partially attributed to the differences in review time periods, which is half the time of the previous evaluation period. Of the loans originated this evaluation period, \$13.2 million were in the Indiana Non-MSA and \$29.1 million in the Indianapolis, IN MSA assessment area. Most loans were towards affordable housing and the provisions of community services. Please refer to the individual assessment area summaries the Indiana Non-MSA and the Indianapolis, IN MSA assessment area for more information. Please note that the bank did not originate any community development loans in the state of Illinois.

The following table presents the bank's community development lending in the state of Indiana during the evaluation period.

Community Development Loans September 21, 2021 – November 6, 2023										
	Affordable Housing		Economic Development		Revitalize/ Stabilize		Community Service		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Indiana Non-MSA	1	10,000	0	0	1	600	3	2,550	5	13,150
Kokomo, IN MSA #29020	0	0	0	0	0	0	0	0	0	0
Terre Haute, IN MSA #45460	0	0	0	0	0	0	0	0	0	0
Indianapolis-Carmel-Anderson, IN MSA #26900	2	19,162	0	0	0	0	2	9,913	4	29,075
Lafayette-West Lafayette, IN MSA #29200	0	0	0	0	0	0	0	0	0	0
Broader Statewide or Regional	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>3</b>	<b>29,162</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>600</b>	<b>5</b>	<b>12,463</b>	<b>9</b>	<b>42,225</b>

## INVESTMENT TEST

FFBT performance relative to the Investment Test is low satisfactory. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. FFBT makes occasional use of innovative and/or complex investments to support community initiatives. The bank demonstrates adequate responsiveness to credit and community development needs.

During the evaluation period, the bank originated \$16.3 million in current period investments. This was a significant increase from the previous evaluation, in which the bank invested approximately \$7.0 million and accounting for the difference in time period reviews. A significant portion of these investments were directed towards affordable housing projects throughout the assessment areas. The Indiana Non-MSA assessment area holds the most current period investments, making up 63.1 percent of all investments. Please see the individual assessment area summaries for further details.

The following table presents community development investments made during the evaluation period.

Community Development Investments (Dollars in 000s) September 21, 2021 – November 6, 2023						
Assessment Area	Current Period Funded			Current Period Funded Totals (\$)	Prior Period Funded (\$)	Current or Prior Unfunded (\$)
	Affordable Housing (\$)	Community Service (\$)	Economic Development (\$)			
Full Review AAs						
Danville, IL MSA #19180	55	0	0	55	0	0
Kokomo, IN MSA #29020	1,347	470	0	1,817	0	0
Indiana Non-MSA	4,593	5,694	0	10,287	0	0
Terre Haute, MSA	1,252	0	0	1,252	0	0
Limited Review AAs						
Illinois Non-MSA	0	0	0	0	0	0
Indianapolis-Carmel-Anderson, IN MSA	110	0	2,785	2,895	0	0
Lafayette-West Lafayette, IN MSA #29200	0	0	0	0	0	0
Total	7,357	6,164	2,785	16,306	0	0

The bank's performance with respect to investments also includes its donations and grants activity to organizations providing community services and affordable housing opportunities throughout the combined assessment area. During the evaluation period, the bank made 50 such donations for \$148,000, which was a decrease of 67.3 percent by number and a decrease of 64.4 percent by dollar from the previous evaluation period. However, given the difference in evaluation time periods, the performance is more comparable. Donations were responsive to assessment area needs. Please see the full review assessment area analyses for more detail.

The following table presents the bank's community development grants and donations throughout its combined assessment area during the review period.

Community Development Donations (Dollars in 000s) September 21, 2021 – November 6, 2023										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalize / Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
<b>Full Review AAs</b>										
Danville, IL MSA #19180	0	0	5	17	0	0	0	0	5	17
Kokomo, IN MSA #29020	0	0	16	38	0	0	0	0	16	37.5
Indiana Non-MSA	1	10	12	31	0	0	0	0	13	40.5
Terre Haute, IN MSA #45460	1	5	8	16	0	0	0	0	9	20.5
<b>Limited Review AAs</b>										
Illinois Non-MSA	0	0	0	0	0	0	0	0	0	0
Indianapolis-Carmel-Anderson, IN MSA #26900	0	0	3	15	0	0	0	0	3	15
Lafayette-West Lafayette, IN MSA #29200	2	8	2	10	0	0	0	0	4	17.5
Total	4	23	46	127	0	0	0	0	50	148
<i>Note: Dollar amounts are rounded and not reflective of exact figures.</i>										

## SERVICE TEST

FFBT's performance relative to the Service Test is low satisfactory. The bank's service delivery systems are accessible to geographies and individuals of different income levels in its assessment areas. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income (LMI) geographies and to low- and moderate-income individuals. The bank's services do not vary in a way that inconveniences its assessment areas, particularly low- or moderate-income geographies or low- or moderate-income individuals. Finally, the bank provided a limited level of community development services within its assessment areas.

## Retail Services

FFBT's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment areas, particularly low- or moderate-income geographies or low- or moderate-income individuals.

FFBT operates from 35 branch locations, including its main office in Converse, Indiana. The bank also maintains 58 ATMs and 37 ITMs throughout its combined assessment area. Beginning May of 2022, the bank began adding ITMs throughout the assessment areas

served to alleviate branch resource issues and to provide additional access to customers. There are currently two branches in low-income (5.7 percent), seven in moderate-income (20.0 percent), 19 in middle-income (54.3 percent), and seven in upper-income census tracts (20.0 percent).

Bank locations are open Monday through Friday with standard hours from 9:00 a.m. to 4:00 p.m., and multiple locations also provide drive-up services with extended hours and services on Saturdays. All products and services are consistent among all branches. The bank offers free ATMs, internet and mobile banking, and automated telephone banking service to meet the financial service needs of the residents and businesses in the bank's assessment areas. Additionally, as previously noted, the bank now offers services through ITMs that combine ATM functions with access to a live teller, or virtual banker. This innovative technology permits customers to perform common banking transactions while talking with a virtual banker, who appears live on the ITM screen.

### Community Development Services

FFBT provides a limited level of community development services. The bank provided 1,173 community development service hours to organizations during the evaluation period. This represents a significant decrease when compared to the 5,370 hours provided by the bank in the previous performance evaluation; it is a higher number of hours averaged per day once the evaluation durations are accounted for. Time was primarily spent with organizations devoted to community services representing, 84.6 percent of the total service hours. Community service hours were dispersed throughout most of the assessment areas, with approximately 386 hours, or 32.9 percent, occurring in the Indiana Non-MSA. Many service hours took the form of leadership roles on boards and committees, as well as the provisions of financial/technical assistance.

Community Development Services September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Community Services	Economic Development	Total Hours	% of Total
<b>Full Review AAs</b>					
Danville, IL MSA #19180	0	0	0	0	0.0
Kokomo, IN MSA #29020	0	319	0	319	27.2
Indiana Non-MSA	0	386	0	386	32.9
Terre Haute, IN MSA #45460	0	288	0	288	24.6
<b>Limited Review AAs</b>					
Illinois Non-MSA	0	0	0	0	0.0
Indianapolis-Carmel-Anderson, IN MSA #26900	0	0	180	180	15.3
Lafayette-West Lafayette, IN MSA #29200	0	0	0	0	0
<b>Total Hours</b>	<b>0</b>	<b>993</b>	<b>180</b>	<b>1,173</b>	<b>100.0</b>
<i>Note: Hours were rounded to nearest decimal point and may not add up to the totals which were also rounded to the nearest decimal point.</i>					

## **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.



## STATE OF INDIANA

### CRA RATING FOR INDIANA<sup>1</sup>:

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

**The Investment Test is rated:** Low Satisfactory

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

FFBT's performance relative to the Lending Test in the state of Indiana is rated Low Satisfactory based on the following factors as determined by the full-scope assessment areas: the bank demonstrates an adequate geographic distribution, particularly to low- and moderate-income geographies in its assessment area. The bank displays an adequate distribution of loans among individuals of different incomes and businesses and farms of different sizes, given the product lines offered by the bank. The bank exhibits a good record of serving the credit needs of low- and moderate-income individuals and small businesses and farms with gross annual revenues of \$1 million or less. The bank makes limited use of innovative or flexible practices in serving assessment area credit needs. Further, the bank makes an adequate level of community development loans.

FFBT's performance relative to the Investment Test in the state of Indiana is rated Low Satisfactory. The bank makes an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments to support community development initiatives. The bank exhibits adequate responsiveness to credit and community development needs.

FFBT's performance relative to the Service Test in the state of Indiana is Low Satisfactory based on the following factors: delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment area; record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals; services do not vary in a way that inconveniences the needs of its assessment area, particularly low- and moderate-income geographies and/or low- and moderate-income individuals; and the bank provides a limited level of community development services.

### SCOPE OF EXAMINATION

Performance within the state of Indiana was evaluated using full review examination procedures for the Indiana Non-MSA, Kokomo, IN MSA #29020, and Terre Haute, MSA, IN MSA #45460 assessment areas. Limited review procedures were used to evaluate the Lafayette-West Lafayette, IN MSA #29200 and Indianapolis-Carmel-Anderson, IN MSA #26900, given the bank's limited

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<sup>1</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

presence in those areas. The scope of the examination is consistent with that which is defined for the whole review; see the more detailed description of the scope contained in the introduction section.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN INDIANA**

FFBT maintains operations in the state of Indiana through 30 offices and 48 ATMs/ITMs, including the main office headquartered in Converse, Indiana. The bank operates in five individual assessment areas within the state including the following: Indianapolis-Carmel-Anderson, IN MSA #26900; Kokomo, IN MSA #29020; Indiana Non-MSA; Terre Haute, IN MSA #45460; and Lafayette-West Lafayette, IN MSA #29200. Information regarding relevant demographic and economic conditions is discussed under each individual assessment area.

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

### **LENDING TEST**

FFBT's performance relative to the Lending Test in the state of Indiana is Low Satisfactory based on adequate geographic distribution of lending throughout the assessment areas in the state of Indiana, along with adequate distribution of lending among individuals of different income levels and businesses (including farms) of different sizes. FFBT exhibits an adequate record of serving the credit needs of low- and moderate-income individuals and small businesses and farms with gross annual revenues of \$1 million or less. The bank makes limited use of innovative or flexible practices in serving assessment area credit needs. Further, the bank makes an adequate level of community development loans. The rating is primarily attributed to the bank's performance in the Indiana Non-MSA, Kokomo, IN MSA, and Terre Haute, IN MSA due to the branching network of these areas and overall lending presence.

The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

### **Geographic Distribution of Loans**

FFBT's lending activities reflect adequate distribution throughout the assessment areas in the state of Indiana. The conclusions were based primarily on the bank's record of lending to consumers, businesses, and farms in its Indiana Non-MSA, Kokomo, IN MSA, and Terre Haute, IN MSA assessment areas.

### **Lending to Borrowers of Different Income Levels and Lending to Businesses and Farms of Different Sizes**

FFBT's lending activities reflect adequate distribution, particularly in its assessment areas, of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank. In most instances, the bank was below the aggregate of lenders in lending to small businesses and small farms reporting annual revenues of \$1 million or less.

FFBT exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms) with gross annual revenues of \$1 million or less, consistent with safe and sound operations. The bank makes limited use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- or moderate-income individuals or geographies.

### **Community Development Lending**

FFBT makes an adequate level of community development loans. The bank originated nine qualified community development loans totaling approximately \$42.2 million, which represents an 88.5 percent decrease by number and 43.5 percent decrease by dollar from the previous evaluation. The decrease is partially attributed to the current evaluation period, which is nearly half the time of the previous evaluation period. Of the loans originated during this evaluation period, approximately \$13.2 million were in the Indiana Non-MSA, and \$29.1 million were in the Indianapolis, IN MSA assessment area. Most loans were towards affordable housing and the provisions of community services. Please refer to the individual assessment area summaries, the Indiana Non-MSA and the Indianapolis, IN MSA assessment area for more information.

The following table presents community development lending in the state of Indiana during the evaluation period.

Community Development Loans September 21, 2021 – November 6, 2023										
	Affordable Housing		Economic Development		Revitalize/ Stabilize		Community Services		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Indiana Non-MSA	1	10,000	0	0	1	600	3	2,550	5	13,150
Kokomo, IN MSA #29020	0	0	0	0	0	0	0	0	0	0
Terre Haute, IN MSA #45460	0	0	0	0	0	0	0	0	0	0
Indianapolis-Carmel-Anderson, IN MSA #26900	2	19,162	0	0	0	0	2	9,913	4	29,075
Lafayette-West Lafayette, IN MSA #29200	0	0	0	0	0	0	0	0	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>3</b>	<b>29,162</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>600</b>	<b>5</b>	<b>12,463</b>	<b>9</b>	<b>42,225</b>

## INVESTMENT TEST

FFBT's performance relative to the Investment Test in the state of Indiana is Low Satisfactory. FFBT made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. FFBT makes occasional use of innovative and/or complex investments to support community initiatives. The bank demonstrates adequate responsiveness to credit and community development needs.

In the state of Indiana, FFBT made 36 current period investments totaling \$16.3 million. A significant portion of these investments support affordable housing projects throughout the assessment areas. The Indiana Non-MSA assessment area holds the most current period investments, making up 63.3 percent of all investments. Please see the individual assessment area summaries for further details.

The following table presents community development investments in the state of Indiana during the evaluation period.

Community Development Investments September 21, 2021 – November 6, 2023								
State of Indiana	Prior Period Investments		Current Period Investments		Total Investments		Unfunded Commitments	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000)
Affordable Housing	0	0	26	7,302	26	7,302	0	0
Economic Development	0	0	2	2,785	2	2,785	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Community Services	0	0	8	6,164	8	6,164	0	0
<b>Total</b>	0	0	36	16,251	36	16,251	0	0
<i>Note: Percentages may not add to 100.0 percent due to rounding.</i>								

FFBT made 45 donations totaling approximately \$131,000 in the state of Indiana during the evaluation period. This represents a decrease of 65.1 percent by number and a 65.1 percent by dollar amount from the previous evaluation. When considering the difference in evaluation time period, this still represents a decline in donations since the previous evaluation. The majority of the donations were to organizations providing a multitude of community services. Of the total amount, 16 by number and approximately \$37,500 by dollar went to support the Kokomo, IN MSA assessment area and 13 by number and approximately \$40,500 by dollar went to support the Indiana Non-MSA assessment area. Please see the assessment area summaries for further details.

Community Development Donations (Dollars in 000s) September 21, 2021 – November 6, 2023											
State of Indiana	Affordable Housing		Economic Development		Revitalize/Stabilize		Community Services		Total		
	#	\$	#	\$	#	\$	#	\$	#	\$	% of Total \$
	4	22.5	0	0	0	0	41	108.5	45	131	88.5
<i>* Note: Dollar amounts are rounded and not reflective of exact figures.</i>											

## SERVICE TEST

FFBT's performance relative to the Service Test in the state of Indiana is Low Satisfactory. The bank's delivery systems are accessible to geographies and individuals of different income levels. Its record of opening and closing branches has not adversely impacted the accessibility of its delivery systems, particularly low- and moderate-income geographies and to low- and moderate-income individuals. Services do not vary in a way that inconveniences low- and moderate-income individuals or geographies. Further, the bank provides a limited level of community development services.

## Retail Services

FFBT's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment areas, particularly low- or moderate-income geographies or low- or moderate-income individuals.

The bank maintains 30 full-service branch locations, including the main office, inside the combined assessment areas in the state of Indiana. There have been no branch openings, closings or relocations since previous evaluation, however, since May of 2022 the bank has opened 30 ITMs throughout the state of Indiana. These ITMs help alleviate branch resources, while extending services to customers. Furthermore, the bank opened a LPO in Carmel, Indiana on December 1, 2022.

The bank's services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or individuals. Most branches have standard hours from 9:00 a.m. to 4:00 p.m., Monday through Thursday and are open until 5:00 p.m. on Fridays with extended drive-thru hours including Saturdays. Applications for all loan and deposit products are accepted at each location. Additionally, mortgage applications are accepted online through the bank's website. Alternative delivery systems include ATMs, ITMs internet banking, and mobile banking.

## Community Development Services

FFBT provides a limited level of community development services. The bank provided approximately 1,173 hours of qualified services in the state of Indiana during the evaluation period, hours were fairly well distributed across assessment areas, when compared to previous evaluations. Community development services decreased statewide by 3,694 hours, or 75.9 percent, a significant decrease from the previous examination, even after accounting for the change in the evaluation period duration. The majority of hours took place in the Indiana Non-MSA and Kokomo, IN MSA assessment areas. Services provided included board and committee membership on non-profit organizations, financial education, and consultation services. Please refer to the individual assessment areas for more information.

The following table presents the community development services provided during the evaluation period.

Community Development Services September 21, 2021 – November 6, 2023										
State of Indiana	Affordable Housing		Economic Development		Revitalize/ Stabilize		Community Services		Total	
	#	Hours	#	Hours	#	Hours	#	Hours	#	Hours
Indiana Non-MSA	0	0	0	0	0	0	6	386	6	386
Kokomo, IN MSA #29020	0	0	0	0	0	0	15	319	15	319
Terre Haute, IN MSA #45460	0	0	0	0	0	0	1	288	1	288
Indianapolis-Carmel-Anderson, IN MSA #26900	0	0	1	180	0	0	0	0	1	180
<b>Total</b>	0	0	1	180	0	0	9	993	10	1,172
<i>Note: Hours were rounded to nearest decimal point and may not add up to the totals which were also rounded to the nearest decimal point.</i>										

## INDIANA NON-MSA - FULL REVIEW

### SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope presented in the overall section of the performance evaluation.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN INDIANA NON-MSA<sup>2</sup>

The Indiana Non-MSA assessment area consists of eleven counties including Cass, Clinton, Fulton, Grant, Huntington, Miami, Pulaski, Starke, Tipton, and Wabash Counties in their entirety, while taking portions of Marshall County. The assessment area contains 92 total census tracts comprised of three low-, 20 moderate-, 60 middle-, and nine upper-income census tracts. The composition of the assessment area has changed slightly since the previous evaluation when there was no low income, 21 moderate-, 63 middle-, and seven upper- income census tracts. There are no underserved or distressed census tracts.

*The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.*

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2021 Designations (#)	2022 Designations (#)	Net Change (#)
Low	0	3	3
Moderate	21	20	-1
Middle	63	60	-3
Upper	7	9	2
Unknown	0	0	0
Total	91	92	1
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020			

<sup>2</sup> Census tract designations are based on American Community Survey income data. For years 2022 and after, the designations are based on 2016-2020 ACS data. For years 2021 and before, the designations are based on 2011-2015 ACS data. For examinations that include performance before and after 2022, both sets of data have been used to perform the analysis of bank activity in the respective timeframes.



The main office is located in the Indiana Non-MSA in the city of Converse, Indiana, as well as 14 branches and 12 full-service ATM/ITMs, and 12 cash-only ATMs throughout the assessment area. Of the branches, five, or 35.7 percent, are located in moderate-income census tracts located in the cities of Fairmount, Knox, and Peru. Since the previous evaluation, the bank has not opened or closed any branches or ATMs in the assessment area. However, 17 ITMs have been opened in this assessment area since the previous evaluation.

The Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report dated June 30, 2022, ranked FFBT first among 29 FDIC-insured institutions serving the assessment area, with 13.4 percent of the market share. The second ranked institution, 1st Source Bank, had 10.0 percent of the market share followed by The Farmers Bank with 5.9 percent of the assessment area deposits.

Based on 2022 aggregate lending data, FFBT ranked fourth of 317 HMDA reporters in loan originations in the assessment area. A total of 386 originations were reported by FFBT, which was well below the leader in the market, Ruoff Mortgage Co. Inc. with 813 HMDA originations. Additionally in 2021, FFBT ranked first of 94 CRA reporters. The bank originated 1,775 CRA-reportable loans (1,376 small business and 399 small farm loans), with 1<sup>st</sup> Source Bank following with 618 originations. Overall, FFBT is a leading financial services participant in the assessment area, with respect to deposits and loans. Information regarding census-related and business and farm demographic characteristics of the assessment area is provided in the following table.

2022 IN Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	3.3	2,712	3.1	793	29.2	18,012	20.3
Moderate	20	21.7	15,997	18.0	2,625	16.4	17,776	20.1
Middle	60	65.2	59,034	66.6	4,554	7.7	19,369	21.9
Upper	9	9.8	10,902	12.3	726	6.7	33,488	37.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	92	100.0	88,645	100.0	8,698	9.8	88,645	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,256	2,396	2.4	45.6	2,087	39.7	773	14.7
Moderate	30,504	16,625	16.7	54.5	9,512	31.2	4,367	14.3
Middle	102,024	67,732	68.2	66.4	21,425	21.0	12,867	12.6
Upper	16,092	12,633	12.7	78.5	2,042	12.7	1,417	8.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	153,876	99,386	100.0	64.6	35,066	22.8	19,424	12.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	484	4.2	408	3.9	72	7.7	4	1.8
Moderate	2,354	20.3	2,111	20.2	197	21.2	46	20.7
Middle	7,574	65.2	6,834	65.3	588	63.2	152	68.5
Upper	1,212	10.4	1,118	10.7	74	7.9	20	9.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	11,624	100.0	10,471	100.0	931	100.0	222	100.0
Percentage of Total Businesses:				90.1		8.0		1.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	0.2	3	0.2	0	0.0	0	0.0
Moderate	55	4.2	53	4.1	2	10.0	0	0.0
Middle	1,008	77.4	994	77.6	13	65.0	1	100.0
Upper	236	18.1	231	18.0	5	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,302	100.0	1,281	100.0	20	100.0	1	100.0
Percentage of Total Farms:				98.4		1.5		0.1
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

## Population Characteristics

The following table presents the population trends for the assessment area counties, the Indiana Non-MSA in its entirety, and the state of Indiana from 2015 to 2020. Of the eleven counties comprising the bank's assessment area, only two of the counties (Clinton and Stark) experienced population growth from 2015 to 2020 of 1.1 percent. In contrast, two counties experienced population declines of greater than four percent; Pulaski County at 4.1 percent and Wabash County at 4.3 percent. The state of Indiana experienced a population gain of 3.3 percent while the entire Non-MSA Indiana experienced an overall decline of 0.3 percent.

A community representative attributed the decrease in population to younger individuals leaving the area to experience more urban areas. The lack of affordable housing has also contributed to the decline in population.

Population Change			
Area	2015 Population	2020 Population	Percentage Change (%)
Cass County	38,476	37,870	-1.6
Clinton County	32,835	33,190	1.1
Fulton County	20,527	20,480	-0.2
Grant County	68,896	66,674	-3.2
Huntington County	36,863	36,662	-0.5
Marshall County	46,962	46,095	-1.8
Miami County	36,211	35,962	-0.7
Pulaski County	13,047	12,514	-4.1
Stark County	23,117	23,371	1.1
Tipton County	15,573	15,359	-1.4
Wabash County	32,358	30,976	-4.3
Indiana Non-MSA	1,475,951	1,471,133	-0.3
State of Indiana	6,568,645	6,785,528	3.3
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

## Income Characteristics

Based upon 2022 FFIEC Census Data, the assessment area had 40.4 percent of its families by family income classified as either low- (20.3 percent) or moderate-income (20.1 percent). The percentage of families residing within the assessment area that live below the poverty line is 9.8 percent, which is above the state of Indiana rate of 8.9 percent. All counties in the assessment area experienced an increase in median family income (MFI) from 2015 to 2020. Tipton and Wabash Counties experienced significant growth in MFI with increases of 26.1, and 15.4 percent, respectively. These were the only two counties to outpace the entire Indiana Non-MSA, which had an increase in MFI

of 10.1 percent. Of the geographies listed below, Miami, Clinton, and Marshall Counties experienced the lowest growth in MFI from 2015 to 2020 with increases of 1.2, 4.3, and 5.7 percent, respectively. A community representative noted that individuals that have stayed in the area, particularly those in trade professions with specific skillsets, have realized gains in income.

The following table presents income characteristics between 2015 and 2020 in the assessment area counties, the entire Indiana Non-MSA, and the state of Indiana.

Median Family Income Change			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percentage Change (%)
Cass County	58,242	64,078	10.0
Clinton County	63,966	66,686	4.3
Fulton County	59,442	64,657	8.8
Grant County	53,711	58,153	8.3
Huntington County	62,543	67,994	8.7
Marshall County	65,119	68,813	5.7
Miami County	61,543	62,297	1.2
Pulaski County	56,098	61,569	9.8
Stark County	54,707	60,246	10.1
Tipton County	64,775	81,705	26.1
Wabash County	58,020	66,953	15.4
Indiana Non-MSA	60,873	67,032	10.1
State of Indiana	66,777	73,265	9.7
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

## Housing Characteristics

Based upon 2022 FFIEC Census Data, the assessment area includes 153,876 housing units; the majority are owner-occupied, representing 64.6 percent of the units, followed by 22.8 percent rental units and 12.6 percent vacant housing units. The median age of housing stock in the assessment area is 61 years, which is older than the average in the state of Indiana as a whole (46 years). Owner occupied housing units in the low- and moderate-income census tracts make up 45.6 percent and 54.5 percent of these census tracts, respectively, indicating that opportunities for home mortgage, refinances, and home improvement lending exist in those census tracts.

The following table presents the recent housing cost burden for counties within the assessment area, the entire Indiana Non-MSA, and the state of Indiana. The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0 percent or more of their income on housing costs.

Low-income renters experienced the cost burden significantly greater than moderate-income renters throughout the assessment area counties. Grant, Marshall and Wabash Counties experienced housing cost burden above 40.0 percent for all renters. Similarly to renters, low-income owners experienced a greater housing cost burden than moderate-income owners.

According to FFIEC HMDA loan and application records, home mortgage trends reflect increases in home mortgage activity in recent years across the assessment area's counties and the broader region. These trends suggest a continued increase in demand for home purchases, driving up home values and indicating that housing cost burden for low-and moderate-income owners will remain elevated. A community representative noted that the aging housing stock needs rehabilitation, which makes habitable affordable housing harder to find.

Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Cass County	61.4	10.3	32.1	48.0	17.7	13.7
Clinton County	82.1	25.0	39.0	58.6	21.5	13.7
Fulton County	63.1	34.3	34.9	54.8	18.6	15.0
Grant County	71.9	20.9	40.9	55.6	14.3	15.5
Huntington County	74.1	17.5	36.4	56.3	21.6	14.5
Marshall County	75.4	20.5	43.1	56.0	24.4	16.5
Miami County	68.3	27.8	38.1	54.5	13.9	12.3
Pulaski County	65.2	20.8	32.6	49.3	21.2	15.7
Stark County	58.6	21.7	31.5	57.3	16.3	15.3
Tipton County	75.0	2.0	39.6	43.0	11.3	10.6
Wabash County	79.5	20.5	40.1	44.8	14.6	10.4
Indiana Non-MSA	66.5	20.4	34.4	53.2	19.9	14.4
State of Indiana	73.3	26.8	41.0	57.2	22.9	15.1
Cost Burden is housing cost that equals 30.0 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

## Employment Characteristics

The following table presents the unemployment rates between 2017 and 2021 in the counties that comprise the assessment area, the entire Indiana Non-MSA, and the state of Indiana. Overall, all geographies experienced decreased unemployment rates in 2021. Notable increases are observed in 2020 due to the widespread economic downturn caused by the COVID-19 pandemic. All of the counties with the exception of Grant, Miami, and Stark Counties experienced lower unemployment rates than the state of Indiana. Marshall County had the lowest unemployment rate of 2.7 percent in comparison to Miami County which had the highest unemployment rate of 4.4 percent. A community representative stated that while work is readily available, positions can be challenging to fill as limited housing

availability makes relocations to the assessment area more difficult.

Unemployment Rates (%)					
Area	2017	2018	2019	2020	2021
Cass County	3.8	3.6	3.4	6.9	3.6
Clinton County	3.0	2.8	2.7	5.7	2.8
Fulton County	3.5	3.3	3.1	6.6	3.3
Grant County	3.8	3.8	3.6	6.4	3.7
Huntington County	3.5	3.5	3.2	6.7	3.0
Marshall County	3.0	3.1	3.1	6.5	2.7
Miami County	3.9	4.0	3.9	8.2	4.4
Pulaski County	3.4	3.1	3.0	6.1	2.9
Stark County	4.4	4.3	4.3	8.1	4.3
Tipton County	3.0	2.8	2.7	6.2	3.0
Wabash County	3.5	3.4	3.1	6.2	2.9
Indiana Non-MSA	3.4	3.2	3.1	6.6	3.0
State of Indiana	3.5	3.4	3.3	7.2	3.6
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics (LAUS)					

### Industry Characteristics

According to data from the U.S. Bureau of Labor Statistics, the assessment area is most heavily impacted by retail trade, construction and manufacturing industries. A community representative noted that younger generations are finding success following trade school to secure higher paying jobs in various trade industries.

### Community Representatives

Two community representatives with a focus on affordable housing and economic development were contacted to increase understanding of the credit needs and market conditions within the assessment area. The focus of the community representatives included the involvement of the growth in trade schools in benefitting the job market, considering the number of trade industries in the assessment area. Another focus was the lack of housing available in the areas, specifically affordable housing that is habitable; given the existing housing stock is older and requires significant rehabilitation.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA NON-MSA**

### **LENDING TEST**

The bank has an adequate geographic distribution of loans in the assessment area; an adequate distribution of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank; a good record of serving the credit needs of low-and moderate-income individuals, or small businesses and farms with gross annual revenues of \$1 million or less; makes limited use of innovative and flexible lending practices in serving assessment area credit needs; and provides an adequate level of CD loans.

For HMDA-reportable lending, 2022 figures were used to evaluate the bank's performance, while 2021 figures were used for comparison purposes. For CRA-reportable lending, 2021 figures were used to evaluate the bank's performance while 2022 figures were used for comparison given the availability of aggregate lender data. Finally, when determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics (e.g., percentage of owner-occupied housing units or percentage of borrowers by income levels) as it is a better measure of loan demand.

The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

FFBT exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment areas, low-income individuals, or businesses (including farms) with gross annual revenues of \$1 million or less, consistent with safe and sound operations. Lastly, the bank makes limited use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- or moderate-income individuals or geographies.

### **Geographic Distribution of Loans**

FFBT's lending activities reflect adequate distribution throughout the assessment area. The bank's assessment area includes three low-income; 20 moderate-income; 60 middle-income; and nine upper-income census tracts. For purposes of this analysis, HMDA-reportable home purchase, refinance, and CRA-reportable small business loans were used as the primary factor for determining the rating. Small farm loans could not provide a meaningful analysis given 98.8 percent of all farms are located in either middle- or upper-income census tracts.

In 2022, the bank's rate of HMDA-reportable lending within moderate-income census tracts was deemed adequate as the bank's performance was comparable to the aggregate lenders

and the assessment area demographics. The bank's 2021 performance with respect to small business loans was adequate given the bank's performance exceeded the aggregate lenders, while performing slightly below the percentage of small businesses operating in moderate-income census tracts. The bank's performance with respect to small farm loans was adequate given the bank's performance was comparable to both the aggregate of lenders and the percentage of small farms operating in moderate-income census tracts. Finally, the bank's distribution of lending across geographies of different income levels in 2021 within home mortgage loans was consistent with 2022 figures. Loans to small businesses and farms in 2022, exceeded originations in 2021.

A gap analysis was completed as part of the evaluation. In 2022, the bank made loans in 66.7 percent of the low-income census tracts and 75.0 percent of the moderate-income census tracts. Overall, the bank made loans in 83.7 percent of the census tracts in this assessment area. Based upon this analysis, there were no conspicuous, unexplained lending gaps in the assessment area.

### HMDA Reportable Lending

In 2022, the bank's rate of HMDA-reportable lending was adequate. The bank's 2022 HMDA-reportable lending in the assessment area was concentrated in home purchase and refinance loans, which comprised 83.0 percent of the 317 HMDA loans originated. Due to low volume, multi-family, home improvement, other loan purpose, and loan purpose not applicable loans were not considered within the analysis of HMDA-reportable lending.

#### *Home Purchase Loans*

Home purchase loans represent 37.2 percent of the bank's HMDA-reportable loans originated in the Indiana Non-MSA assessment area in 2022. FFBT did not originate any of its home purchase loans within low-income census tracts. By comparison, the aggregate lender rate was 1.8 percent and 2.4 percent of the assessment area's owner-occupied units are located in low-income census tracts. FFBT originated 22.0 percent of its home purchase loans within moderate-income census tracts. The bank's performance exceeded the aggregate lender rate of 19.3 percent, and the 16.7 percent of the assessment area's owner-occupied units located in moderate-income census tracts. Within middle-income census tracts, the bank originated 61.9 percent of its home purchase loans. The bank's performance was below the aggregate lender rate of 67.8 percent and the 68.2 percent of owner-occupied units located in middle-income census tracts. The bank originated 16.1 percent of its home purchase loans in upper-income tracts, which was above the aggregate of lender rate of 11.1 percent and the owner-occupied units located in upper-income tracts at 12.7 percent. The bank's overall performance in 2021 was comparable to 2022 figures.



### *Refinance Loans*

Refinance loans represent 45.7 percent of the bank's HMDA-reportable loans originated in the Indiana Non-MSA assessment area in 2022. FFBT did not originate any of its refinance loans within low-income census tracts. By comparison, the aggregate lender rate was 0.9 percent and 2.4 percent of the assessment area's owner-occupied units are located in low-income census tracts. Within moderate-income census tracts, the bank originated 12.4 percent of its refinance home loans. The bank's performance was below both the aggregate lender rate of 14.2 percent, and the 16.7 percent of the assessment area's owner-occupied units located in moderate-income census tracts. Within middle-income census tracts, the bank originated 64.8 percent of its refinance loans. The bank's performance was below both the aggregate lender rate of 71.6 percent, and the 68.2 percent of owner-occupied units located in middle-income census tracts. The bank originated 22.8 percent of its refinance loans in upper-income census tracts, which exceeded both the aggregate of lenders at 13.3 percent and the owner-occupied units located in upper-income tracts at 12.7 percent. The bank's overall performance relative to refinance loans in 2021 was comparable to 2022 figures.

The following table presents the bank's 2022 HMDA-reportable lending in the assessment area; 2021 tables are available in Appendix B.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: IN Non MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	1.8	0	0.0	1.3	2.4
Moderate	26	22.0	19.3	2,478	14.0	14.8	16.7
Middle	73	61.9	67.8	11,398	64.3	70.0	68.2
Upper	19	16.1	11.1	3,838	21.7	13.9	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	118	100.0	100.0	17,714	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.9	0	0.0	0.5	2.4
Moderate	18	12.4	14.2	1,574	8.6	10.7	16.7
Middle	94	64.8	71.6	11,967	65.7	72.7	68.2
Upper	33	22.8	13.3	4,665	25.6	16.1	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	145	100.0	100.0	18,206	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.8	0	0.0	1.2	2.4
Moderate	10	19.2	14.9	787	27.3	13.2	16.7
Middle	33	63.5	70.5	1,615	56.1	70.8	68.2
Upper	9	17.3	12.7	478	16.6	14.8	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	52	100.0	100.0	2,880	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	2.1	0	0.0	0.4	4.4
Moderate	1	50.0	29.8	320	28.1	39.5	29.4
Middle	1	50.0	63.8	818	71.9	56.3	59.0
Upper	0	0.0	4.3	0	0.0	3.9	7.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	1,138	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.5	0	0.0	1.0	2.4
Moderate	55	17.4	16.7	5,159	12.9	15.1	16.7
Middle	201	63.4	69.4	25,798	64.6	69.9	68.2
Upper	61	19.2	12.5	8,981	22.5	14.0	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	317	100.0	100.0	39,938	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

### Small Business Loans

The bank's performance with respect to small business loans was adequate given the bank's performance exceeded the aggregate of lenders and was below the percentage of small businesses operating in moderate-income census tracts. In 2021, the bank originated 60 small business loans in the Indiana Non-MSA assessment area. The bank originated 13, or 21.7 percent of total loans within moderate-income census tracts. The bank's performance exceeded the aggregate lender rate of 19.0 percent and was below the percentage of small businesses located in moderate-income census tracts at 25.8 percent. Within middle-income census tracts, the bank originated 76.7 percent of its small business loans. The bank's performance exceeded the performance of aggregate lenders at 69.7 percent and the percentage of small businesses at 64.6 percent in middle-income census tracts. Lastly, the bank's lending in upper-income census tracts at 1.7 percent was below the aggregate lenders at 10.4 percent and the percentage of small businesses at 9.6 percent operating in upper-income census tracts. The bank's small business lending increased from 60 small business loans in 2021 to 235 loans in 2022. In addition, decennial changes added three low-income census tracts to the assessment area in 2022; the bank originated 4.7 percent of their small business loans in these tracts, exceeding the percent of businesses in these tracts at 4.2 percent.

The following table presents the bank's 2021 small business lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: IN Non MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	13	21.7	19.0	1,909	21.7	26.3	25.8
Middle	46	76.7	69.7	6,805	77.3	64.9	64.6
Upper	1	1.7	10.4	89	1.0	8.5	9.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.9	0	0.0	0.2	
Total	60	100.0	100.0	8,803	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

### Small Farm Loans

The bank's performance with respect to small farm loans was adequate given the bank's performance was comparable to both the aggregate of lenders and the percentage of small farms operating in moderate-income census tracts. In 2021, the bank originated 127 small farm loans in the Indiana Non-MSA assessment area. The bank originated one, or 0.8 percent of total loans within moderate-income census tracts. The bank's performance was comparable to both the aggregate lender rate of 1.3 percent and the percentage of small farms located in moderate-income census tracts at 1.2 percent. Within middle-income census tracts, the bank originated 90.6 percent of its small farm loans. The bank's performance exceeded the performance of aggregate lenders at 80.5 percent and the percentage of small farms at 83.3 percent in middle-income census tracts. Lastly, the bank's lending in upper-income census tracts at 8.7 percent was below both the aggregate lenders at 17.8 percent and the percentage of small farms at 15.5 percent operating in upper-income census tracts. The bank's small farm lending increased from 127 small farm loans in 2021 to 430 loans in 2022. In addition, decennial changes added three low-income census tracts to the assessment area in 2022; the bank did not originate any small farm loans in these tracts; the percent of farms in these tracts is minimal at 0.2 percent.

The following table presents the bank's 2021 small farm lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Farm Lending By Income Level of Geography							
Assessment Area: IN Non MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	0.8	1.3	200	0.9	0.8	1.2
Middle	115	90.6	80.5	19,600	91.0	82.6	83.3
Upper	11	8.7	17.8	1,729	8.0	16.6	15.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.4	0	0.0	0.0	
<b>Total</b>	<b>127</b>	<b>100.0</b>	<b>100.0</b>	<b>21,529</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data							
2021 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

## **Lending to Borrowers of Different Income Levels and Lending to Businesses and Farms of Different Sizes**

FFBT's lending activities reflect adequate distribution, particularly in its assessment area, of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank.

In 2022, the bank's performance relative to HMDA-reportable lending was adequate. Among low-income borrowers, the bank's performance was comparable to the aggregate of lenders, and below the percentage of low-income families in the assessment area. Among moderate-income borrowers, the bank's performance was slightly below the aggregate of lenders and the percentage of moderate-income families in the assessment area. The bank's overall HMDA-reportable lending performance in 2021 was comparable.

In 2021, the bank's performance relative to small business lending was good as the bank's lending to businesses reporting annual revenues of \$1 million or less exceeded the rate of the aggregate of lenders and was below the percentage of businesses with \$1 million or less in annual revenues operating in the assessment area. In 2021, the bank's performance relative to small farm loans was adequate as the bank's rate of lending to farms reporting annual revenues of \$1 million or less exceeded the rate of the aggregate of lenders, however, it was below the percentage of farms with \$1 million or less in annual revenues operating in the assessment area.

### HMDA Reportable Lending

The bank's 2021 and 2022 HMDA-reportable lending in the assessment area was concentrated in home purchase and refinance loans. As such, multi-family, home improvement, other loan purpose, and loan purpose not applicable loans were not considered within the analysis.

#### *Home Purchase Loans*

In 2022, the bank originated 14.4 percent of its home purchase loans to low-income borrowers, which was comparable to the aggregate lender rate of 14.2 percent and below the 20.3 percent of low-income families located in the assessment area. Among moderate-income borrowers, the bank originated 28.0 percent of its home purchase loans, which was comparable to the aggregate lender rate of 27.9 percent, and above the 20.1 percent of moderate-income families located in the assessment area. This performance is significant, based on the need identified by a community representative for affordable housing in the assessment area, particularly those relocating to this assessment area for trade work. The bank originated 18.6 percent of its home purchase loans to middle-income borrowers which was below both the aggregate of lenders at 21.6 percent, and the assessment area

demographics, at 21.9 percent. The bank originated 29.7 percent of its home purchase loans to upper-income borrowers which exceeded the aggregate of lenders at 19.5 percent and was below the assessment area demographics at 37.8 percent. Lastly, the bank originated 9.3 percent of home purchase loans to families where the income-level is unknown, which was below the aggregate lender rate of 16.7 percent. Within home purchase loans, the bank's overall performance in 2021 was comparable to 2022 figures.

#### *Refinance Loans*

In 2022, the bank originated 9.0 percent of its refinance loans to low-income borrowers, which was below the aggregate lender rate of 15.5 percent. Neither the bank nor the aggregate of lenders met the 20.3 percent of low-income families located in the assessment area. Among moderate-income borrowers, the bank originated 22.8 percent of its refinance loans, which was below the aggregate lender rate of 26.7 percent, however, performance was above the 20.1 percent of moderate-income families located in the assessment area. Refinance loans originated to middle-income borrowers at 26.2 percent was comparable to the aggregate of lenders at 25.7 percent and above the assessment area demographics at 21.9 percent. The bank originated 37.2 percent of its refinance loans to upper-income borrowers which exceeded the aggregate of lenders at 25.4 percent and was comparable to the assessment area demographics at 37.8 percent. Lastly, the bank originated 4.8 percent of refinance loans to families where the income-level is unknown, slightly below the aggregate lender rate of 6.6 percent. Within refinance loans, the bank's overall performance in 2021 was comparable to 2022 figures.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: IN Non MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	17	14.4	14.2	1,342	7.6	8.6	20.3
Moderate	33	28.0	27.9	4,253	24.0	22.2	20.1
Middle	22	18.6	21.6	3,510	19.8	22.4	21.9
Upper	35	29.7	19.5	7,201	40.7	29.8	37.8
Unknown	11	9.3	16.7	1,408	7.9	17.0	0.0
Total	118	100.0	100.0	17,714	100.0	100.0	100.0
Refinance Loans							
Low	13	9.0	15.5	635	3.5	9.5	20.3
Moderate	33	22.8	26.7	2,752	15.1	21.8	20.1
Middle	38	26.2	25.7	3,514	19.3	26.1	21.9
Upper	54	37.2	25.4	8,263	45.4	34.2	37.8
Unknown	7	4.8	6.6	3,042	16.7	8.3	0.0
Total	145	100.0	100.0	18,206	100.0	100.0	100.0
Home Improvement Loans							
Low	6	11.5	13.0	210	7.3	7.5	20.3
Moderate	15	28.8	24.8	558	19.4	19.2	20.1
Middle	14	26.9	23.8	607	21.1	21.4	21.9
Upper	13	25.0	34.4	834	29.0	46.3	37.8
Unknown	4	7.7	4.0	671	23.3	5.6	0.0
Total	52	100.0	100.0	2,880	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	36	11.4	14.3	2,187	5.6	8.7	20.3
Moderate	81	25.7	26.3	7,563	19.5	21.6	20.1
Middle	74	23.5	23.3	7,631	19.7	23.4	21.9
Upper	102	32.4	24.0	16,298	42.0	32.2	37.8
Unknown	22	7.0	12.1	5,121	13.2	14.0	0.0
Total	315	100.0	100.0	38,800	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

### Small Business Loans

The bank's performance relative to small business loans was good as the bank's rate of lending to businesses reporting annual revenues of \$1 million or less was above the rate of the aggregate of lenders and below the percentage of businesses with \$1 million or less in annual revenues operating in the assessment area. In 2021, the bank originated 36 loans or 60.0 percent of its small business loans to businesses with revenues of \$1 million or less. This

rate was significantly above the aggregate lender rate of 41.3 percent, and significantly below the percentage of total businesses in the assessment area at 90.1 percent. Of the small business loans, 77.8 percent were made in amounts of \$100,000 or less to businesses with annual revenues of \$1 million or less, which are considered most beneficial to small businesses. Overall, the bank's performance in 2022 was below the figures in 2021.

The following table presents the borrower distribution of small business loans in 2021; 2022 tables are available in Appendix B.

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: IN Non MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	36	60.0	41.3	3,619	41.1	25.9	90.1
Over \$1 Million	18	30.0		4,793	54.4		8.0
Revenue Unknown	6	10.0		391	4.4		1.9
Total	60	100.0		8,803	100.0		100.0
By Loan Size							
\$100,000 or Less	42	70.0	92.1	1,730	19.7	38.2	
\$100,001 - \$250,000	8	13.3	4.5	1,415	16.1	18.4	
\$250,001 - \$1 Million	10	16.7	3.4	5,658	64.3	43.4	
Total	60	100.0	100.0	8,803	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	28	77.8		999	27.6		
\$100,001 - \$250,000	4	11.1		640	17.7		
\$250,001 - \$1 Million	4	11.1		1,980	54.7		
Total	36	100.0		3,619	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

### Small Farm Loans

The bank's performance relative to small farm loans was adequate as the bank's rate of lending to farms reporting annual revenues of \$1 million or less exceeded the rate of the aggregate of lenders, however, it was below the percentage of farms with \$1 million or less in annual revenues operating in the assessment area. In 2021, the bank originated 97 loans or 76.4 percent of its small farm loans to farms with revenues of \$1 million or less. This rate greatly exceeded the aggregate lender rate of 59.8 percent and was below the percentage of



total farms in the assessment area at 98.3 percent. Of the small farm loans, 36.1 percent were made in amounts of \$100,000 or less to farms with annual revenues of \$1 million or less, which are considered most beneficial to small farms. Overall, the bank's performance in 2022 was comparable to the figures in 2021.

The following table presents the borrower distribution of small farm loans in 2021; 2022 tables are available in Appendix B.

Distribution of 2021 Small Farm Lending By Revenue Size of Farms							
Assessment Area: IN Non MSA							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	97	76.4	59.8	16,455	76.4	71.7	98.3
Over \$1 Million	21	16.5		4,093	19.0		1.5
Revenue Unknown	9	7.1		981	4.6		0.2
Total	127	100.0		21,529	100.0		100.0
By Loan Size							
\$100,000 or Less	46	36.2	71.3	2,087	9.7	20.3	
\$100,001 - \$250,000	52	40.9	17.9	9,072	42.1	35.9	
\$250,001 - \$500,000	29	22.8	10.8	10,370	48.2	43.8	
Total	127	100.0	100.0	21,529	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	35	36.1		1,444	8.8		
\$100,001 - \$250,000	41	42.3		7,376	44.8		
\$250,001 - \$500,000	21	21.6		7,635	46.4		
Total	97	100.0		16,455	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

## Community Development Lending

FFBT makes an adequate level of community development loans. Overall, the bank originated five community development loans totaling approximately \$13.2 million, with \$10.0 million going towards the development of affordable housing; specifically, the loan reflects good responsiveness as it is providing an affordable housing complex that is entirely low- and moderate-income occupied. The current period volume of community development loans represents a significant decrease when compared to the previous evaluation period when the bank originated 46 loans for

\$25.5 million. Even when factoring the shorter evaluation period when compared to the previous evaluation, the bank made significantly fewer community development loans in this assessment area for this evaluation.

The following table presents the bank's community development loans in the assessment area during the review period.

Community Development Loans September 21, 2021 – November 6, 2023										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize/Stabilize		Total	
	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#
Indiana Non-MSA	10,000	1	2,550	3	0	0	600	1	13,150	5

## INVESTMENT TEST

FFBT made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. During the evaluation period, FFBT originated 17 new investments totaling \$4.6 million toward affordable housing purposes, through Low-Income Housing Tax Credits (LIHTC). In addition, seven investments totaling \$5.7 million were made in general obligation and school bonds to improve services to low- and moderate-income families. FFBT makes occasional use of innovative and/or complex investments to support community initiatives. The bank demonstrates adequate responsiveness to credit and community development needs, as affordable housing has been identified by community representatives as a significant need in this assessment area. Overall, the volume of community development investments represents a significant increase, as compared to the previous evaluation when the bank made four investments totaling \$5.9 million in the Indiana Non-MSA assessment area.

The following table presents the bank's qualified community development investments during the review period.

Community Development Investments (Dollars in 000s) September 21, 2021 – November 6, 2023						
Assessment Area	Current Period Funded			Current Period Funded (\$)	Prior Period Funded (\$)	Total Unfunded (\$)
	Affordable Housing (\$)	Community Services (\$)	Economic Development (\$)			
Indiana Non-MSA	4,593	5,694	0	10,287	0	0

FFBT distributed a total of \$40,500 in qualified grants and donations in the current evaluation period. The majority of the grants were dedicated to organizations providing community services which totaled \$30,500, with an additional \$10,000 going to an affordable

housing organization. The bank's total qualified grants decreased, even when factoring in the difference in evaluation periods, to the previous evaluation period when donations totaled \$164,140.

The following table presents the bank's qualified community development donations during the review period.

Community Development Grants/Donations (Dollars 000s)					
September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Community Services	Economic Development	Total	
	\$	\$	\$	\$	%
Indiana Non-MSA	10,000	30,500	0	40,500	27.4

## SERVICE TEST

FFBT's delivery services are accessible to geographies and individuals of different income levels in its assessment area. Its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area, particularly moderate-income geographies or low- or moderate-income individuals. Finally, the bank provides a limited level of community development services.

## Retail Services

FFBT's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals.

FFBT operates 14 branches, 12 full-service ATMs, and 12 cash-only ATMs within this assessment area. Five branches are located in a moderate-income census tract while all remaining are located in middle- and upper-income tracts. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Since the previous evaluation, the bank has added 17 ITMs throughout the assessment area. These ITMs are another avenue to provide branch services to the customers. Its services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals.

Most branches throughout the Indiana Non-MSA assessment area have standard hours from 9:00 a.m. to 4:00 p.m., Monday through Thursday and are open until 5:00 p.m. on Fridays with extended drive-thru hours including Saturdays. Applications for all loan and deposit products are accepted at each branch location. Additionally, mortgage applications are accepted online through the bank's website. Alternative delivery systems include ATMs, ITMs, internet banking, and mobile banking.

### Community Development Services

FFBT provides an limited level of community development services in the Indiana Non-MSA assessment area. Bank employees provided 386 hours, or 32.9 percent, of the 1,173 total hours of qualified community development services within this assessment area. A majority of service hours were served as board members or providing technical assistance to community service organizations providing services to low- and moderate-income individuals and families. Overall, the bank's performance is a significant decrease over the previous evaluation's service hours totaling 3,131, even when accounting for the difference in the time periods of the previous and current evaluations.

Community Development Services September 21, 2021 – November 6, 2023						
Assessment Area	Affordable Housing	Community Service	Economic Development	Revitalize/Stabilize	Total Hours	% of Total
	# Hours	# Hours	# Hours	# Hours		
Indiana Non-MSA	0	386	0	0	386	32.9

## KOKOMO, IN MSA – FULL REVIEW

### SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope presented in the overall section of the performance evaluation.

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

The Kokomo, IN MSA assessment area consists of Howard County in its entirety. The assessment area contains 21 total census tracts comprised of one low-, five moderate-, nine middle-, and six upper-income census tracts. The composition of the assessment area has changed slightly since the previous evaluation when there were two low-, four moderate-, nine middle-, and five upper- income census tracts.

#### *Tract Designation Change Data*

*The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau’s American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.*

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2021 Designations (#)	2022 Designations (#)	Net Change (#)
Low	2	1	-1
Moderate	4	5	1
Middle	9	9	0
Upper	5	6	1
Unknown	0	0	0
Total	20	21	1
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020			

There are six branches and eight full-service and three cash-only ATMs throughout the assessment area. Of the branches, three, or 50.0 percent, are located in low- or moderate-income census tracts. Since the previous evaluation, the bank has not opened or closed any branches or ATMs in the assessment area. However, six ITMs have been added since the

previous evaluation. These ITMs alleviate branch resources and provide another avenue of access to its customers.

The FDIC Deposit Market Share Report dated June 30, 2022, ranked FFBT first among nine FDIC-insured institutions serving the assessment area, with 28.1 percent market share. The second ranked institution, Community First Bank of Indiana, had 25.1 percent of the market share followed by BMO Harris Bank National Association (N.A.) with 14.4 percent of the assessment area deposits.

Based on 2022 aggregate lending data, FFBT ranked third of 189 HMDA reporters in loan originations in the assessment area. A total of 161 originations were reported by FFBT, which was well below the leader in the market, Solidarity Community Federal with 307 HMDA originations. Additionally in 2021, FFBT ranked first of 56 CRA reporters. The bank originated 343 CRA-reportable loans (282 small business and 61 small farm loans), with American Express National Bank following with 135 originations. Overall, FFBT is a leading financial services participant in the assessment area, with respect to deposits and loans.

Information about census-related and business and farm demographic characteristics of the assessment area is provided in the following table.

2022 Kokomo, IN MSA 29020 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	4.8	832	3.8	384	46.2	4,428	20.1
Moderate	5	23.8	3,911	17.8	678	17.3	3,700	16.8
Middle	9	42.9	9,066	41.2	720	7.9	4,957	22.5
Upper	6	28.6	8,208	37.3	332	4.0	8,932	40.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	21	100.0	22,017	100.0	2,114	9.6	22,017	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,064	567	2.3	27.5	995	48.2	502	24.3
Moderate	8,751	4,558	18.2	52.1	2,412	27.6	1,781	20.4
Middle	17,395	10,643	42.6	61.2	4,890	28.1	1,862	10.7
Upper	11,452	9,212	36.9	80.4	1,355	11.8	885	7.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	39,662	24,980	100.0	63.0	9,652	24.3	5,030	12.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	227	8.0	209	7.9	16	8.8	2	5.7
Moderate	539	18.9	493	18.7	39	21.5	7	20.0
Middle	1,268	44.5	1,166	44.3	90	49.7	12	34.3
Upper	817	28.7	767	29.1	36	19.9	14	40.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,851	100.0	2,635	100.0	181	100.0	35	100.0
Percentage of Total Businesses:				92.4		6.3		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.8	1	0.8	0	0.0	0	0.0
Moderate	2	1.6	2	1.7	0	0.0	0	0.0
Middle	20	16.4	20	16.5	0	0.0	0	0.0
Upper	99	81.1	98	81.0	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	122	100.0	121	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

## Population Characteristics

The following table presents the population trends for the assessment area (Howard County) which is the entirety of the Kokomo, IN MSA and the state of Indiana from 2010 to 2015. The assessment area experienced a population growth of 1.1 percent, while the state of Indiana experienced a 3.3 percent population gain. Community representatives noted that while population growth is flat, there have been concerted efforts to maintain and attract young families.

Population Change			
Area	2015 Population	2020 Population	Percentage Change (%)
Assessment Area	82,765	83,658	1.1
State of Indiana	6,568,645	6,785,528	3.3
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

## Income Characteristics

Based upon the 2022 FFIEC Census Data, the assessment area had 36.9 percent of its families by family income classified as either low- (20.1 percent) or moderate-income (16.8 percent). The percentage of families residing within the assessment area that live below the poverty line is 9.6 percent, which is above the state of Indiana rate of 8.9 percent. The assessment area experienced an increase in median family income (MFI) from 2015 to 2020 of 8.2 percent, below the income growth for the state of Indiana at 9.7 percent. The community representative noted that incomes have historically been low, and efforts are being made to attract new manufacturers that offer competitive wages. In addition, recent contract agreements with auto workers have included an increase in wages.

The following table presents income characteristics between 2015 and 2020 in the assessment area and the state of Indiana.

Median Family Income Change			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percentage Change (%)
Assessment Area	64,583	69,896	8.2
State of Indiana	66,777	73,265	9.7
Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.			



## Housing Characteristics

According to the 2022 FFIEC Census Data, the assessment area contains a total of 39,662 housing units; the majority are owner-occupied, representing 63.0 percent of the units, followed by 24.3 percent rental units, and 12.7 percent vacant housing units. Of the housing units located in moderate-income census tracts, 52.1 percent are owner-occupied units, indicating that opportunities for home mortgage, refinances, and home improvement lending exist in those census tracts. However, in the low-income census tract, only 27.5 of units are owner-occupied, limiting opportunities.

The following table presents the recent housing cost burden for the assessment area and the state of Indiana. The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0 percent or more of their income on housing costs.

Renters across all income levels in the assessment area experience this burden at 39.9 percent. Overall, the housing cost burden for homeowners within the assessment area (13.2 percent) is lower than the state of Indiana, which has 15.1 percent of all homeowners being burdened by their payments towards housing. Low-income renters in the assessment area experience the greatest housing burden at 75.5 percent, which is comparable to the low-income renters within the state of Indiana at 73.3 percent.

According to FFIEC HMDA loan and application records, home mortgage trends reflect increases in home mortgage activity in recent years across the assessment area's counties and the broader region. These trends suggest a continued increase in demand for home purchases, driving up home values and indicating that housing cost burden for low-and moderate-income homeowners will remain elevated. A community representative stated that the rental market in the affordable range consists of older stock and new rentals are not affordable, indicating a need for affordable and quality housing units in the assessment area.

Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	75.5	17.7	39.9	55.4	19.1	13.2
State of Indiana	73.3	26.8	41.0	57.2	22.9	15.1
<i>Cost Burden is housing cost that equals 30.0 percent or more of household income</i> <i>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy</i>						

## Employment Characteristics

The following table presents unemployment rates between 2017 and 2021 in the County that makes up the assessment area. Overall, the county experienced decreased unemployment rates in 2021. A notable increase is observed in 2020 due to the widespread economic downturn caused by the COVID-19 pandemic. The unemployment rate in the county was 6.2 percent, which is a notable difference when compared to the state of Indiana at 3.6 percent. A community representative stated that there is a lack of stable job opportunities within the assessment area. The assessment area has a lot of service industry related employment opportunities and income often fluctuates. The representative explained a lot of employers utilize temporary employees to fill time-specific roles, and then go with different staff to fill the permanent role, making employment very unstable.

Unemployment Rates (%)					
Area	2017	2018	2019	2020	2021
Assessment Area	3.8	4.0	4.0	11.0	6.2
State of Indiana	3.5	3.4	3.3	7.2	3.6

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics (LAUS)

## Industry Characteristics

According to data from the U.S. Bureau of Labor Statistics, the assessment area is most heavily impacted by the manufacturing, healthcare, and retail trade industries. A community representative stated two automotive battery plants are opening in the assessment area and current automotive plants offer job opportunities. A lot of opportunities within the assessment area are service industry focused.

## Community Representative

A community representative with a focus on affordable housing was contacted to increase understanding of the credit needs and market conditions within the assessment area. The community representative stated that the automotive industry is present within the assessment area, providing a stable employment option when compared to other industries. The representative noted that the population will decline due to the cost increasing for rental properties and the overall lack of affordable housing. Additionally, employment opportunities are unstable throughout the assessment area as many employers hire for temporary positions instead of permanent roles. The greatest need identified by the community representative is affordable housing units.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KOKOMO, IN MSA**

### **LENDING TEST**

The bank has an adequate geographic distribution of loans in the assessment area; an adequate distribution of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank; an adequate record of serving the credit needs of low-and moderate-income individuals, or small businesses and farms with gross annual revenues of \$1 million or less; makes limited use of innovative and flexible lending practices in serving assessment area credit needs; and makes few, if any CD loans.

For HMDA-reportable lending, 2022 figures were used to evaluate the bank's performance, while 2021 figures were used for comparison purposes. For CRA-reportable lending, 2021 figures were used to evaluate the bank's performance while 2022 figures were used for comparison given the availability of aggregate lender data. For purposes of this analysis, small business and HMDA-reportable loans were given more weight than small farm loans in determining conclusions due to higher volume. Finally, when determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics (e.g., percentage of owner-occupied housing units or percentage of borrowers by income levels) as it is a better measure of loan demand.

The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

### **Geographic Distribution of Loans**

FFBT's lending activities reflect adequate distribution throughout the assessment area. The bank's assessment area includes one low-income; five moderate-income; nine middle-income; and six upper-income census tracts. For purposes of this analysis, HMDA-reportable home purchase, refinance, and CRA-reportable small business loans were used as the primary factor for determining the rating. Small farm loans could not provide a meaningful analysis given 97.6 percent of all farms are located in either middle- or upper-income census tracts.

In 2022, the bank's rate of HMDA-reportable lending within low-income census tracts was deemed adequate as the bank's performance was comparable to the aggregate lenders and assessment area demographics, while moderate-income census tracts performance was below the aggregate lenders and the assessment area demographics. The bank's 2021 performance with respect to small business loans was adequate given the bank's

performance was below the aggregate lenders and below the percentage of small businesses operating in moderate-income census tracts. The bank's performance with respect to small farm loans was adequate given the bank's performance was comparable to both the aggregate of lenders and the percentage of small farms operating in low- and moderate-income census tracts, even though the bank did not originate loans in such tracts. Finally, the bank's distribution of lending across geographies of different income levels in 2021 within home mortgage and loans to small businesses and farms was consistent with the distribution of loans in 2022.

A gap analysis was completed as part of the evaluation. In 2022, the bank made loans in all of the low- and 80.0 percent of the moderate-income census tracts. Overall, the bank made loans in a majority of the census tracts in this assessment area. Based upon this analysis, there were no conspicuous, unexplained lending gaps in the assessment area.

### HMDA Reportable Loans

In 2022, the bank's rate of HMDA-reportable lending was adequate. The bank's 2022 HMDA-reportable lending in the assessment area was concentrated in home purchase and refinance loans, which comprised 89.3 percent of the 122 HMDA loans originated. Due to low volume, multi-family, home improvement, other loan purpose, and loan purpose not applicable loans were not considered within the analysis of HMDA-reportable lending.

### *Home Purchase Loans*

Home purchase loans represent 44.3 percent of the bank's HMDA-reportable loans located in the Kokomo, IN MSA assessment area in 2022. FFBT originated 7.4 percent of its home purchase loans within the low-income census tract. The bank's performance exceeded both the aggregate lender rate of 3.1 percent, and the 2.3 percent of the assessment area's owner-occupied units located in the low-income census tract. The bank originated 13.0 percent of its home purchase loans within moderate-income census tracts. The bank's performance was below the aggregate lender rate of 21.7 percent and the 18.2 percent of the assessment area's owner-occupied units located in moderate-income census tracts. Within middle-income census tracts, the bank originated 33.3 percent of its home purchase loans. The bank's performance was below the aggregate lender rate of 46.0 percent and the 42.6 percent of owner-occupied units located in middle-income census tracts. The bank originated 46.3 percent of its home purchase loans in upper-income tracts, which exceeded the aggregate of lender rate of 29.2 percent, and the owner-occupied units located in upper-income tracts at 36.9 percent. The bank's overall performance in 2021 was comparable to 2022 figures.

### *Refinance Loans*

Refinance loans represent 45.1 percent of the bank's HMDA-reportable loans located in the Kokomo, IN MSA assessment area in 2022. The bank did not originate any loans in the low-income census tract. By comparison, the aggregate lender rate was 1.7 percent and 2.3 percent of the assessment area's owner-occupied units are located in the low-income census tract. Within moderate-income census tracts, the bank originated 7.3 percent of its refinance loans. The bank's performance was below the aggregate lender rate of 13.3 percent and the 18.2 percent of the assessment area's owner-occupied units located in moderate-income census tracts. Within middle-income census tracts, the bank originated 23.6 percent of its refinance loans. The bank's performance was below the aggregate lender rate of 39.5 percent and the 42.6 percent of owner-occupied units located in middle-income census tracts. The bank originated 69.1 percent of its refinance loans in upper-income census tracts, which greatly exceeded the aggregate of lenders at 45.5 percent and the owner-occupied units located in upper-income tracts at 36.9 percent. The bank's overall performance relative to refinance loans in 2021 was comparable to 2022 figures.

The following table presents the bank's 2022 HMDA-reportable lending in the assessment area; 2021 tables are available in Appendix B.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Kokomo, IN MSA 29020							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	4	7.4	3.1	270	2.7	1.5	2.3
Moderate	7	13.0	21.7	874	8.8	14.9	18.2
Middle	18	33.3	46.0	3,334	33.5	46.0	42.6
Upper	25	46.3	29.2	5,472	55.0	37.6	36.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	54	100.0	100.0	9,950	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.7	0	0.0	0.9	2.3
Moderate	4	7.3	13.3	190	3.6	8.0	18.2
Middle	13	23.6	39.5	1,021	19.6	34.8	42.6
Upper	38	69.1	45.5	3,997	76.7	56.3	36.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	55	100.0	100.0	5,208	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.2	0	0.0	2.7	2.3
Moderate	1	7.7	13.4	31	4.0	11.5	18.2
Middle	3	23.1	34.5	123	15.7	25.6	42.6
Upper	9	69.2	47.9	628	80.3	60.3	36.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	782	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	11.1	0	0.0	6.3	
Moderate	0	0.0	33.3	0	0.0	20.1	9.2
Middle	0	0.0	55.6	0	0.0	73.5	72.5
Upper	0	0.0	0.0	0	0.0	0.0	8.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	4	3.3	2.5	270	1.7	1.8	
Moderate	12	9.8	17.7	1,095	6.9	13.4	18.2
Middle	34	27.9	43.0	4,478	28.1	45.2	42.6
Upper	72	59.0	36.8	10,097	63.3	39.6	36.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	122	100.0	100.0	15,940	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

## Small Business Loans

FFBT's performance with respect to small business loans was adequate given the bank's limited originations to small businesses in 2021 within the assessment area with performance being below the aggregate of lenders and to the percentage of small businesses operating in moderate-income census tracts. However, performance in 2022 was greater than in 2021 as detailed below. In 2021, the bank originated 13 small business loans in the Kokomo, IN MSA assessment area. The bank did not originate any small business loans within low-income census tracts. By comparison, the aggregate lender rate was 10.7 percent, and the percentage of small businesses located in low-income census tracts at 10.9 percent. The bank originated two, or 15.4 percent of total loans within moderate-income census tracts. The bank's performance was below the aggregate lender rate of 18.4 percent and the percentage of small businesses located in moderate-income census tracts at 19.1 percent. Within middle-income census tracts, the bank originated 69.2 percent of its small business loans. The bank's performance exceeded the performance of aggregate lenders at 42.9 percent and the percentage of small businesses at 46.0 percent in middle-income census tracts. Lastly, the bank's lending in upper-income census tracts at 15.4 percent was below aggregate lenders at 27.9 percent and the percentage of small businesses at 24.0 percent operating in upper-income census tracts. In 2022, the bank's performance was better as the bank, originated 2.3 percent of its small business loans in low-income tracts and 24.1 percent of lending in moderate-income tracts.

The following table presents the bank's 2021 small business lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Business Lending By Income Level of Geography Assessment Area: Kokomo, IN MSA 29020							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	0	0.0	10.7	0	0.0	10.9	10.9
Moderate	2	15.4	18.4	1,050	32.9	17.6	19.1
Middle	9	69.2	42.9	2,061	64.6	40.5	46.0
Upper	2	15.4	27.9	79	2.5	30.9	24.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.2	0	0.0	0.1	
Total	13	100.0	100.0	3,190	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

## Small Farm Loans

The bank's performance with respect to small farm loans was adequate given the bank's performance was comparable to both the aggregate of lenders and the percentage of small farms operating in low- and moderate-income census tracts, even though the bank did not originate loans in such tracts. A substantial majority of farms are located in middle- and upper-income census tracts. As detailed in the following table, 49.6 percent and 48.0 percent of farms are located in middle- and upper-income census tracts, respectively. Further, the lack of opportunity to lend to small farms in low- and moderate-income census tracts is supported by the aggregate lender performance of 0.9 percent. The performance in 2022 is comparable to the 2021 performance.

The following table presents the bank's 2021 small farm lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Kokomo, IN MSA 29020							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.9	0	0.0	0.2	1.6
Moderate	0	0.0	0.0	0	0.0	0.0	0.8
Middle	11	84.6	54.9	2,679	84.5	53.9	49.6
Upper	2	15.4	44.2	491	15.5	45.9	48.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	3,170	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

## Lending to Borrowers of Different Income Levels and Lending to Businesses and Farms of Different Sizes

FFBT's lending activities reflect adequate distribution, particularly in its assessment area, of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank.

In 2022, the bank's performance relative to HMDA-reportable lending was adequate. Among low-income borrowers, the bank's performance was comparable to the aggregate of lenders, and below the percentage of low-income families in the assessment area. Among moderate-income borrowers, the bank's performance was slightly below the aggregate of lenders and



the percentage of moderate-income families in the assessment area. The bank's overall HMDA-reportable lending performance in 2021 was comparable. In 2021, the bank's performance relative to small business lending was good as the bank's rate of lending to businesses reporting annual revenues of \$1 million or less exceeded the rate of the aggregate of lenders and was below the percentage of businesses with \$1 million or less in annual revenues operating in the assessment area. Similarly, in 2021, the bank's performance relative to small farm loans was good as the bank's rate of lending to farms reporting annual revenues of \$1 million or less exceeded the rate of the aggregate of lenders, however, it was below the percentage of farms with \$1 million or less in annual revenues operating in the assessment area.

### HMDA Reportable Loans

In 2022, the bank's performance relative to HMDA-reportable loans was adequate. The bank's 2022 and 2021 HMDA-reportable lending in the assessment area was concentrated in home purchase and refinance loans. As such, multi-family, home improvement, other loan purpose, and loan purpose not applicable loans were not considered within the analysis.

#### *Home Purchase*

In 2022, the bank originated 13.0 percent of its home purchase loans to low-income borrowers, which was equivalent to the aggregate lender rate of 13.0 percent and below the 20.1 percent of low-income families located in the assessment area. The performance is important, as there is a limited availability of affordable housing in this assessment area. Among moderate-income borrowers, the bank originated 7.4 percent of its home purchase loans, which was significantly below the aggregate lender rate of 23.2 percent, and the 16.8 percent of moderate-income families located in the assessment area. Home purchase loans to middle-income borrowers at 31.5 percent was above the aggregate of lenders at 21.8 percent, and the assessment area demographics, at 22.5 percent. Among upper-income borrowers, the bank's performance of 33.3 percent exceeded the aggregate of lenders at 23.8 percent and was below demographics at 40.6 percent. Lastly, the bank originated 14.8 percent of refinance loans to families where the income was unknown, below the aggregate lender rate of 18.2 percent. Within home purchase loans, the bank's overall performance in 2021 was comparable to 2022 figures.

#### *Refinance Loans*

In 2022, the bank originated 10.9 percent of its refinance loans to low-income borrowers, which was below the aggregate lender rate of 12.7 percent. Neither the bank nor the aggregate of lenders met the 20.1 percent of low-income families located in the assessment area. Among moderate-income borrowers, the bank originated 9.1 percent of its refinance loans, which was significantly below the aggregate lender rate of 25.2 percent, and the 16.8

percent of moderate-income families located in the assessment area. Refinance loans originated to middle-income borrowers at 41.8 percent exceeded the aggregate of lenders at 28.5 percent and the assessment area demographics at 22.5 percent. Among upper-income borrowers, the bank's performance of 30.9 percent exceeded the aggregate of lenders at 24.5 percent and was below the assessment area demographics at 40.6 percent. Lastly, the bank originated 7.3 percent of refinance loans to families where the income was unknown, below the aggregate lender rate of 9.1 percent. Within refinanced loans, the bank's overall performance in 2021 was comparable to 2022 figures.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Kokomo, IN MSA 29020							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	7	13.0	13.0	782	7.9	7.3	20.1
Moderate	4	7.4	23.2	434	4.4	17.0	16.8
Middle	17	31.5	21.8	2,840	28.5	22.7	22.5
Upper	18	33.3	23.8	4,837	48.6	32.7	40.6
Unknown	8	14.8	18.2	1,057	10.6	20.3	0.0
Total	54	100.0	100.0	9,950	100.0	100.0	100.0
Refinance Loans							
Low	6	10.9	12.7	378	7.3	7.4	20.1
Moderate	5	9.1	25.2	335	6.4	19.3	16.8
Middle	23	41.8	28.5	2,063	39.6	28.2	22.5
Upper	17	30.9	24.5	2,042	39.2	34.3	40.6
Unknown	4	7.3	9.1	390	7.5	10.8	0.0
Total	55	100.0	100.0	5,208	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	10.9	0	0.0	8.9	20.1
Moderate	0	0.0	20.2	0	0.0	14.9	16.8
Middle	3	23.1	29.4	108	13.8	24.2	22.5
Upper	10	76.9	36.1	674	86.2	49.3	40.6
Unknown	0	0.0	3.4	0	0.0	2.8	0.0
Total	13	100.0	100.0	782	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	13	10.7	12.1	1,160	7.3	7.3	20.1
Moderate	9	7.4	22.7	769	4.8	17.4	16.8
Middle	43	35.2	25.1	5,011	31.4	24.2	22.5
Upper	45	36.9	26.5	7,553	47.4	33.9	40.6
Unknown	12	9.8	13.6	1,447	9.1	17.1	0.0
Total	122	100.0	100.0	15,940	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

### Small Business Loans

The bank's performance relative to small business loans was good as the bank's rate of lending to businesses reporting annual revenues of \$1 million or less exceeded the rate of the aggregate of lenders and was below the percentage of businesses with \$1 million or less in annual revenues operating in the assessment area. In 2021, the bank originated eight loans or 61.5 percent of small business loans to businesses with revenues of \$1 million or less. This rate was significantly above the aggregate lender rate of 41.5 percent and below the percentage of total businesses in the assessment area at 92.3 percent. Of the small business loans, 62.5 percent were made in amounts of \$100,000 or less to businesses with annual revenues of \$1 million or less, which are considered most beneficial to small businesses. Overall, the bank's performance in 2022 was significantly below the figures in 2021.

The following table presents the bank's 2021 small business lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Kokomo, IN MSA 29020							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	8	61.5	41.5	1,511	47.4	27.3	92.3
Over \$1 Million	3	23.1		1,079	33.8		6.5
Revenue Unknown	2	15.4		600	18.8		1.2
Total	13	100.0		3,190	100.0		100.0
By Loan Size							
\$100,000 or Less	7	53.8	89.6	310	9.7	32.0	
\$100,001 - \$250,000	2	15.4	6.0	365	11.4	21.6	
\$250,001 - \$1 Million	4	30.8	4.5	2,515	78.8	46.4	
Total	13	100.0	100.0	3,190	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	5	62.5		206	13.6		
\$100,001 - \$250,000	1	12.5		125	8.3		
\$250,001 - \$1 Million	2	25.0		1,180	78.1		
Total	8	100.0		1,511	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

### Small Farm Loans

The bank's performance relative to small farm loans was good as the bank's rate of lending to farms reporting annual revenues of \$1 million or less exceeded the rate of the aggregate of lenders, however, it was below the percentage of farms with \$1 million or less in annual revenues operating in the assessment area. In 2021, the bank originated eight loans or 61.5 percent of small farm loans to farms with revenues of \$1 million or less. This rate exceeded the aggregate lender rate of 54.0 percent and was below the percentage of total farms in the assessment area at 99.2 percent. Of the small farm loans, 50.0 percent were made in amounts of \$100,000 or less to farms with annual revenues of \$1 million or less, which are considered most beneficial to small farms. Overall, the bank's performance in 2022 was comparable to the figures in 2021.

The following table presents the bank's 2021 small farm lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Kokomo, IN MSA 29020							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	8	61.5	54.0	1,460	46.1	58.9	99.2
Over \$1 Million	5	38.5		1,710	53.9		0.8
Revenue Unknown	0	0.0		0	0.0		0.0
Total	13	100.0		3,170	100.0		100.0
By Loan Size							
\$100,000 or Less	4	30.8	65.5	186	5.9	16.9	
\$100,001 - \$250,000	4	30.8	20.4	864	27.3	33.7	
\$250,001 - \$500,000	5	38.5	14.2	2,120	66.9	49.4	
Total	13	100.0	100.0	3,170	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	4	50.0		186	12.7		
\$100,001 - \$250,000	2	25.0		374	25.6		
\$250,001 - \$500,000	2	25.0		900	61.6		
Total	8	100.0		1,460	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

## Community Development Lending

FFBT makes few, if any community development loans. The bank did not originate any community development loans in the Kokomo, IN MSA during the evaluation period. This is a significant decline when compared to the previous evaluation period when the bank originated six loans for \$770,300.

## INVESTMENT TEST

FFBT made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. During the evaluation period, FFBT originated one new investment totaling \$1.3 million (funded) toward affordable housing purposes, for an apartment complex with 100 percent of the units rented to low- and moderate individuals and families. This is significant as one community representative noted that there is a need for affordable rental units. In addition, an investment totaling \$470,000 was made in general obligation bonds to improve services to low- and moderate-income families. FFBT makes occasional use of innovative and/or complex investments to support community initiatives. The bank demonstrates good responsiveness to credit and community development needs, as affordable housing has been identified by community representatives as a need in this assessment area. Overall, the volume of community development investments represents a significant increase, as during the previous evaluation period the bank made one investment totaling \$25,000 in the Kokomo, IN MSA assessment area.

Community Development Investments (Dollars in 000s) September 21, 2021 – November 6, 2023						
Assessment Area	Current Period Funded			Current Period Funded (\$)	Prior Period Funded (\$)	Total Unfunded (\$)
	Affordable Housing (\$)	Community Services (\$)	Economic Development (\$)			
Kokomo, IN MSA #29020	1,347	470	0	1,817	0	0

FFBT distributed \$37,500 in qualified grants and donations in the current evaluation period. All of the grants were dedicated to organizations providing community services. The bank's total qualified grants decreased, even when factoring in the difference in evaluation periods, to the previous evaluation period when donations totaled \$96,767.

Community Development Grants/Donations (Dollars 000s) September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Community Services	Economic Development	Total	
	\$	\$	\$	\$	%
Kokomo, IN MSA #29020	0	37,500	0	37,500	25.3

## SERVICE TEST

FFBT's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area, particularly moderate-income geographies or low- or moderate-income individuals. Finally, the bank provides a limited level of community development services.

### Retail Services

FFBT's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals.

The bank operates six branches, eight full-service ATM/ITMs, and three cash-only ATMs within this assessment area in the cities of Kokomo, Russiaville, and Greentown, Indiana. In this assessment area, one branch with two full-service ATMs are located in a low-income census tract and two branches with two full-service ATM/ITMs and one cash-only ATM are located in moderate-income census tracts. The bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, as they have not opened or closed any offices during the review period. The bank has added seven ITMs in this assessment area, alleviating branch resource issues and improving customer access.

The bank's services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or individuals. All offices but the Russiaville and Kokomo Square branches have standard hours from 9:00 a.m. to 4:00 p.m., Monday through Thursday and are open until 5:00 p.m. on Fridays with extended drive-thru hours including Saturdays. The Russiaville branch is located in an upper-income tract and is only open from 9:00 a.m. to 1:00 p.m. with extended drive-thru hours including Saturday. The Kokomo Square branch is located within a moderate-income tract and is open from 9:00 a.m. to 5:00 p.m. Monday through Friday. Applications for all loan and deposit products are accepted at each location. Additionally, mortgage applications are accepted online through the bank's website. Alternative delivery systems include ATMs, ITMs, internet banking, and mobile banking.

### Community Development Services

FFBT provides a limited level of community development services. Bank employees provided 319 hours, or 27.2 percent, of the 1,173 total hours of qualified community development services. All service hours were directed towards organizations providing community services such as education, housing and financial literacy to low- and moderate-income and families. Overall, the bank's performance is a decrease over the previous evaluation's service hours totaling 1,025, even after considering the duration difference between the two sample periods.

Community Development Services September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Community Services	Economic Development	Total Hours	% of Total
Kokomo, IN MSA #29020	0	319	0	0	27.2



## TERRE HAUTE, IN MSA – FULL REVIEW

### SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope presented in the overall section of the performance evaluation.

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN TERRE HAUTE, IN MSA

The Terre Haute, IN MSA assessment area consists of four counties including Clay, Sullivan, Vermillion, and Vigo Counties in their entirety. The assessment area contains 51 total census tracts comprised of four low-, 13 moderate-, 20 middle-, and 13 upper-income census tracts. In addition, there is one census tract where the income is unknown; this tract is home to Indiana State University, which contributes to the designation of this tract. The composition of the assessment area has changed slightly since the previous evaluation when there were four low-, nine moderate-, 20 middle-, and 11 upper- income census tracts.

#### *Tract Designation Change Data*

*The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau’s American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.*

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2021 Designations (#)	2022 Designations (#)	Net Change (#)
Low	4	4	0
Moderate	9	13	4
Middle	20	20	0
Upper	11	13	2
Unknown	0	1	1
<b>Total</b>	<b>44</b>	<b>51</b>	<b>7</b>
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020			

There are five branches and four full-service and three cash-only ATMs throughout the assessment area. There are no branches in low- or moderate-income tracts. Since the previous evaluation, the bank has not opened or closed any branches or ATMs in the assessment area.

The FDIC Deposit Market Share Report dated June 30, 2022, ranked FFBT sixth among seven FDIC-insured institutions serving the assessment area, with a 6.2 percent market share. First ranked institution, First Financial Bank N.A., had 52.5 percent of the market share followed by Old National Bank with 14.9 percent of the assessment area deposits.

Based on 2022 aggregate lending data, FFBT ranked ninth of 234 HMDA reporters in loan originations in the assessment area. A total of 87 originations were reported by FFBT, which was well below the leader in the market, First Financial Bank N.A., with 836 HMDA originations. Additionally in 2021, FFBT ranked fifth of 82 CRA reporters. FFBT originated 194 CRA-reportable loans (156 small business and 38 small farm loans), with First National Bank leading all banks with 1,198 originations. Overall, the bank is providing financial services in a competitive assessment area, with respect to deposits and loans.

Information about census-related and business demographic characteristics of the assessment area in 2022 is provided in the following table.

2022 Terre Haute, IN MSA 45460 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	7.8	2,034	4.8	778	38.2	9,115	21.5
Moderate	13	25.5	9,369	22.1	1,646	17.6	7,522	17.7
Middle	20	39.2	19,648	46.3	1,961	10.0	9,018	21.3
Upper	13	25.5	11,131	26.2	428	3.8	16,757	39.5
Unknown	1	2.0	230	0.5	80	34.8	0	0.0
Total AA	51	100.0	42,412	100.0	4,893	11.5	42,412	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	4,161	1,379	3.0	33.1	2,140	51.4	642	15.4
Moderate	17,594	9,092	19.7	51.7	6,757	38.4	1,745	9.9
Middle	32,370	21,615	46.9	66.8	7,549	23.3	3,206	9.9
Upper	20,611	13,984	30.3	67.8	4,272	20.7	2,355	11.4
Unknown	882	13	0.0	1.5	673	76.3	196	22.2
Total AA	75,618	46,083	100.0	60.9	21,391	28.3	8,144	10.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	307	6.0	268	5.8	38	8.5	1	0.9
Moderate	962	18.7	860	18.8	87	19.4	15	13.9
Middle	2,315	45.0	2,075	45.3	184	41.0	56	51.9
Upper	1,240	24.1	1,127	24.6	84	18.7	29	26.9
Unknown	316	6.1	253	5.5	56	12.5	7	6.5
Total AA	5,140	100.0	4,583	100.0	449	100.0	108	100.0
Percentage of Total Businesses:				89.2		8.7		2.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.3	1	0.3	0	0.0	0	0.0
Moderate	32	10.2	32	10.3	0	0.0	0	0.0
Middle	173	55.1	171	54.8	2	100.0	0	0.0
Upper	108	34.4	108	34.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	314	100.0	312	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.4		0.6		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

## Population Characteristics

The following table presents the population trends for the assessment area, the Terre Haute, IN MSA in its entirety, and the state of Indiana from 2010 to 2015. All four of the counties comprising the bank's assessment area experienced population loss, with Vermillion County experiencing the greatest loss at 2.7 percent. A community representative noted that an aging housing stock and aging population is driving the population loss. Any new residents that are gained have no effect on the population growth rate due to the proportions of older populations in the assessment area. For comparison purposes, the state of Indiana experienced a 3.3 percent population gain while the entire Terre Haute, IN MSA experienced an overall decline of 2.1 percent.

Population Change			
Area	2015 Population	2020 Population	Percentage Change (%)
Assessment Area	171,925	168,875	-1.8
Clay County	26,686	26,466	-0.8
Sullivan County	21,111	20,817	-1.4
Vermillion County	15,860	15,439	-2.7
Vigo County	108,268	106,153	-2.0
Terre Haute, IN MSA	189,032	185,031	-2.1
State of Indiana	6,568,645	6,785,528	3.3
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

## Income Characteristics

Based upon the 2022 FFIEC Census Data, the assessment area had 39.2 percent of its families by family income classified as either low- (21.5 percent) or moderate-income (17.7 percent). The percentage of families residing within the assessment area that live below the poverty line is 11.5 percent, which is above the state of Indiana rate of 8.9 percent. All four counties in the assessment area experienced an increase in median family income (MFI) from 2015 to 2020, although at much different rates. Clay and Vermillion Counties experienced significant growth in MFI with increases of 14.5, and 13.9 percent, respectively. The community representative attributed the increase in income in Clay County to its proximity to Indianapolis and noted that in Vermillion County, there are high salary positions, although employment is limited. These counties outpaced the Terre Haute, IN MSA and the state of Indiana, which experienced increases in MFI of 10.2 and 9.7 percent, respectively. Sullivan County experienced the smallest increase in MFI of 2.1 percent.

The following table presents income characteristics between 2015 and 2020 in the assessment area, the individual counties, the Terre Haute, IN MSA, and the state of Indiana.

Median Family Income Change			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percentage Change (%)
Assessment Area	58,394	63,192	8.2
Clay County	62,027	71,032	14.5
Sullivan County	60,320	61,572	2.1
Vermillion County	55,659	63,399	13.9
Vigo County	57,983	62,460	7.7
Terre Haute, IN MSA	58,034	63,958	10.2
State of Indiana	66,777	73,265	9.7
Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.			

## Housing Characteristics

According to the 2022 FFIEC Census Data, the assessment area contains a total of 75,618 housing units; the majority are owner-occupied, representing 60.9 percent of the units, followed by 28.3 percent rental units, and 10.8 percent vacant housing units. Of the housing units located in the assessment area, 4,161 units, or 5.5 percent are in low-income census tracts and 17,594 units, or 23.3 percent are in moderate-income census tracts. Of the housing units in low- and moderate-income census tracts, 33.1 percent and 51.7 percent respectively are owner-occupied units, indicating that opportunities for home mortgage, refinances, and home improvement lending exist in moderate-income census tracts, while it is more limited in low-income census tracts.

The following table presents the recent housing cost burden for the four individual counties within the assessment area, along with the combined assessment area, the Terre Haute, IN MSA and the state of Indiana. The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0 percent or more of their income on housing costs.

Renters across all income levels in the assessment area experience this burden at 44.4 percent. Low-income renters in the assessment area experience a housing burden at 71.0 percent, which is comparable to the low-income renters within the state of Indiana of 73.3 percent. Vigo County experienced the highest burden for low- and moderate-income renters and low-income owners across the assessment area.

Low-income homeowners experience a greater housing cost burden than moderate-income homeowners across all counties within the assessment area and the state of Indiana. Overall, the housing cost burden for all homeowners within the assessment area (13.1 percent) is lower than the state of Indiana, which has 15.1 percent of all homeowners being burdened by their payments towards housing.

According to FFIEC HMDA loan and application records, home mortgage trends reflect increases in home mortgage activity in recent years across the assessment area's counties and the broader region. These trends suggest a continued increase in demand for home purchases, driving up home values and indicating that housing cost burden for low-and moderate-income homeowners will remain elevated.

Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	71.0	31.7	44.4	54.0	19.2	13.1
Clay County	63.1	29.6	33.1	51.4	21.3	12.9
Sullivan County	61.9	25.0	39.0	41.5	13.0	9.7
Vermillion County	58.7	13.0	32.2	45.8	20.1	11.6
Vigo County	74.2	35.2	48.1	59.2	20.1	14.2
Terre Haute, IN MSA	70.2	31.0	43.7	53.2	18.7	13.0
State of Indiana	73.3	26.8	41.0	57.2	22.9	15.1
Cost Burden is housing cost that equals 30.0 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

## Employment Characteristics

The following table presents unemployment rates between 2017 and 2021 in the counties that comprise the assessment area, the entire Terre Haute, IN MSA, and the state of Indiana. Overall, all counties experienced a decline in unemployment rates in 2021. A notable increase is observed in 2020 due to the widespread economic downturn caused by the COVID-19 pandemic. All of the counties in the assessment area had unemployment rates at or above the rate of the state of Indiana (3.6 percent). Historically, within the assessment area, unemployment and under employment has been an issue, according to the community representative.

Unemployment Rates (%)					
Area	2017	2018	2019	2020	2021
Assessment Area	4.2	4.4	4.3	7.6	4.1
Clay County	3.7	3.9	3.6	6.6	3.6
Sullivan County	4.4	4.6	4.3	7.0	3.8
Vermillion County	5.3	5.4	5.3	7.6	4.0
Vigo County	4.2	4.3	4.4	7.9	4.3
Terre Haute, IN MSA	4.2	4.4	4.3	7.4	4.0
State of Indiana	3.5	3.4	3.3	7.2	3.6
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics (LAUS)					

## **Industry Characteristics**

According to data from the U.S. Bureau of Labor Statistics, the assessment area is most heavily impacted by the manufacturing industry and health care and social assistance organizations. A community representative stated that Vermillion County has a limited number of jobs; however, opportunities exist within manufacturing and energy plants.

## **Community Representative**

One community representative with a focus on economic development was contacted to increase the understanding of the credit needs and market conditions within the assessment area. The representative noted that recent work in bringing new industry to the area has brought into focus the lack of quality housing, particularly in the \$125,000 to \$250,000 range. An aging housing stock and aging population have contributed to the population loss. The representative stated historically, high unemployment and under employment have been an issue. It was noted that financial institutions within the Terre Haute market are good to work with and are very involved in the community, supporting not-for-profit organizations.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TERRE HAUTE, IN MSA**

### **LENDING TEST**

FFBT has an adequate geographic distribution of loans in the assessment area; an adequate distribution of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank; a good record of serving the credit needs of low-and moderate-income individuals, or small businesses and farms with gross annual revenues of \$1 million or less; makes limited use of innovative and flexible lending practices in serving assessment area credit needs; and made few, if any CD loans.

For HMDA-reportable lending, 2022 figures were used to evaluate the bank's performance, while 2021 figures were used for comparison purposes. For CRA-reportable lending, 2021 figures were used to evaluate the bank's performance while 2022 figures were used for comparison given the availability of aggregate lender data. For purposes of this analysis, small business and HMDA-reportable loans were given more weight than small farm loans in determining conclusions due to higher volume. Finally, when determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics (e.g., percentage of owner-occupied housing units or percentage of borrowers by income levels) as it is a better measure of loan demand.

The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

### **Geographic Distribution of Loans**

FFBT's lending activities reflect adequate distribution throughout the assessment area. The bank's assessment area includes four low-income; 13 moderate-income; 20 middle-income; and 13 upper-income census tracts. There is also one tract with unknown income, however, neither the bank nor aggregate lenders originated loans in this tract during the evaluation period. For purposes of this analysis, HMDA-reportable home purchase, refinance, and CRA-reportable small business loans were used as the primary factor for determining the rating. Small farm loans could not provide a meaningful analysis given 98.8 percent of all farms are located in either middle- or upper-income census tracts.

In 2022, the bank's rate of HMDA-reportable lending within low and moderate-income census tracts was deemed adequate as the bank's performance was comparable to the aggregate lenders and the assessment area demographics. Additionally, the bank's 2021 performance with respect to small business loans was good given the bank's performance exceeded the aggregate lenders and the percentage of small businesses operating in low- and moderate-income census tracts. The bank's performance with respect to small farm loans was adequate given the bank's performance was comparable to both the aggregate of lenders and the percentage of small farms operating in low- and moderate-income census tracts, even though the bank did not originate loans in such tracts.

A gap analysis was completed as part of the evaluation. In 2022, the bank made loans in two of four low-income tracts and 11 of 13 moderate-income census tracts. Overall, the bank made loans in 82.4 percent of the census tracts in this assessment area. Based upon this analysis, there were no conspicuous, unexplained lending gaps in the assessment area.

### **HMDA Reportable Loans**

In 2022, the bank's rate of HMDA-reportable lending was adequate. The bank's 2022 HMDA-reportable lending in the assessment area was concentrated in home purchase and refinance loans, which comprised 83.8 percent of the 74 HMDA loans originated. Due to low volume, multi-family, home improvement, other loan purpose, and loan purpose not applicable loans were not considered within the analysis of HMDA-reportable lending.



### *Home Purchase Loans*

Home purchase loans represent 58.1 percent of the bank's HMDA-reportable loans located in the Terre Haute, IN MSA assessment area in 2022. FFBT did not originate any purchase loans in low-income tracts. By comparison, the aggregate lender rate was 3.2 percent and 3.0 percent of the assessment area's owner-occupied units located in low-income census tracts. The bank originated 18.6 percent of its home purchase loans within moderate-income census tracts. The bank's performance was below the aggregate lender rate of 21.7 percent and comparable to the 19.7 percent of the assessment area's owner-occupied units located in moderate-income census tracts. Within middle-income census tracts, the bank originated 37.2 percent of its home purchase loans. The bank's performance was below the aggregate lender rate of 45.2 percent and the 46.9 percent of owner-occupied units located in middle-income census tracts. The bank originated 44.2 percent of its home purchase loans in upper-income tracts, which was above the aggregate of lender rate of 29.9 percent and the owner-occupied units located in upper-income tracts at 30.3 percent. The bank's overall performance in 2021 was comparable to 2022 figures.

### *Refinance Loans*

Refinance loans represent 25.7 percent of the bank's HMDA-reportable loans located in the Terre Haute, IN MSA assessment area in 2022. FFBT did not originate any refinance loans in low-income tracts. However, by comparison, the aggregate lender rate was 2.1 percent and 3.0 percent of the assessment area's owner-occupied units located in low-income census tracts. Within moderate-income census tracts, the bank originated 15.8 percent of its refinance loans. The bank's performance was comparable to the aggregate lender rate of 16.9 percent and below the 19.7 percent of the assessment area's owner-occupied units located in moderate-income census tracts. Within middle-income census tracts, the bank originated 47.4 percent of its refinance loans. The bank's performance was comparable to the aggregate lender rate of 47.3 percent and the 46.9 percent of owner-occupied units located in middle-income census tracts. The bank originated 36.8 percent of its refinance loans in upper-income census tracts, which exceeded both the aggregate of lenders at 33.7 percent and the owner-occupied units located in upper-income tracts at 30.3 percent. The bank's overall performance relative to refinance loans in 2021 was comparable to 2022 figures.

The following table presents the bank's 2022 HMDA-reportable lending in the assessment area; 2021 tables are available in Appendix B.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Terre Haute, IN MSA 45460							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	3.2	0	0.0	1.6	3.0
Moderate	8	18.6	21.7	925	12.6	14.1	19.7
Middle	16	37.2	45.2	2,915	39.7	45.5	46.9
Upper	19	44.2	29.9	3,509	47.7	38.8	30.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	43	100.0	100.0	7,349	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.1	0	0.0	1.2	3.0
Moderate	3	15.8	16.9	163	7.7	11.3	19.7
Middle	9	47.4	47.3	859	40.4	49.8	46.9
Upper	7	36.8	33.7	1,105	52.0	37.6	30.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	2,127	100.0	100.0	100.0
Home Improvement Loans							
Low	1	11.1	2.0	75	20.1	1.6	3.0
Moderate	2	22.2	19.3	119	31.8	17.6	19.7
Middle	6	66.7	48.6	180	48.1	51.0	46.9
Upper	0	0.0	30.0	0	0.0	29.9	30.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	374	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	7.8
Moderate	1	33.3	40.5	265	22.3	8.1	24.3
Middle	0	0.0	29.7	0	0.0	12.2	35.5
Upper	2	66.7	29.7	925	77.7	79.7	22.6
Unknown	0	0.0	0.0	0	0.0	0.0	9.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	1,190	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	1	1.4	2.7	75	0.7	1.3	3.0
Moderate	14	18.9	20.1	1,472	13.3	12.9	19.7
Middle	31	41.9	45.9	3,954	35.8	43.7	46.9
Upper	28	37.8	31.3	5,539	50.2	42.0	30.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	74	100.0	100.0	11,040	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

### Small Business Loans

FFBT's performance with respect to small business loans was good given the bank's performance was above the aggregate of lenders and the percentage of small businesses operating in low- and moderate-income census tracts. In 2022, the bank originated six small business loans in the Terre Haute, IN MSA assessment area. The bank originated one, or 16.7 percent of its loans within low-income census tracts. The bank's performance exceeded the aggregate lender rate of 6.3 percent, and the percentage of small businesses located in low-income census tracts at 6.6 percent. The bank originated two, or 33.3 percent of total loans within moderate-income census tracts. The bank's performance exceeded the aggregate lender rate of 18.1 percent, and the percentage of small businesses located in moderate-income census tracts at 20.8 percent. Within middle-income census tracts, the bank originated 50.0 percent of its small business loans. The bank's performance exceeded the performance of aggregate lenders at 40.5 percent and the percentage of small businesses at 41.5 percent in middle-income census tracts. Lastly, the bank did not originate any loans in upper-income census tracts, while aggregate lenders performed at a rate of 34.5 percent and 31.1 percent of small businesses operate in upper-income census tracts. In 2022, the bank's performance was below 2021 lending, particularly with small business lending in moderate-income census tracts.

The following table presents the bank's 2021 small business lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Terre Haute, IN MSA 45460							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
<b>Low</b>	1	16.7	6.3	15	6.9	9.8	6.6
<b>Moderate</b>	2	33.3	18.1	77	35.3	23.6	20.8
<b>Middle</b>	3	50.0	40.5	126	57.8	40.5	41.5
<b>Upper</b>	0	0.0	34.5	0	0.0	26.0	31.1
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0.7	0	0.0	0.1	
<b>Total</b>	6	100.0	100.0	218	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

## Small Farm Loans

The bank's performance with respect to small farm loans was adequate given the bank's performance was comparable to both the aggregate of lenders and the percentage of small farms operating in low- and moderate-income census tracts, even though the bank did not originate loans in such tracts. A substantial majority of farms are located in middle- and upper-income census tracts. As detailed in the following table, 53.7 percent and 45.1 percent of farms are located in middle- and upper-income census tracts, respectively. Further, the lack of opportunity to lend to small farms in low- and moderate-income census tracts is supported by the aggregate lender performance of 0.9 percent within moderate-income tracts.

In 2022, the bank's performance improved, particularly with small farm lending in moderate-income census tracts. The following table presents the bank's 2021 small farm lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Terre Haute, IN MSA 45460							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.3
Moderate	0	0.0	0.9	0	0.0	1.3	1.0
Middle	10	90.9	48.3	1,374	91.1	48.8	53.7
Upper	1	9.1	50.9	135	8.9	49.9	45.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	1,509	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

## Lending to Borrowers of Different Income Levels and Lending to Businesses and Farms of Different Sizes

FFBT's lending activities reflect adequate distribution, particularly in its assessment area, of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank.

In 2022, the bank's performance relative to HMDA-reportable lending was adequate. Among low- income borrowers, the bank's performance was comparable to the aggregate of lenders and below the percentage of families by income. Among moderate-income borrowers, the bank's performance was comparable to the aggregate of lenders and above the percentage of

families-by-income demographic. In 2021, the bank's performance relative to small business loans was good as the bank's rate of lending to businesses reporting annual revenues of \$1 million or less exceeded the rate of the aggregate of lenders and the percentage of businesses with \$1 million or less in annual revenues operating in the assessment area. Similarly, in 2021, the bank's performance relative to small farm loans was good as the bank's rate of lending to farms reporting annual revenues of \$1 million or less exceeded the rate of the aggregate of lenders and was aligned to the percentage of farms with \$1 million or less in annual revenues operating in the assessment area.

### HMDA Reportable Loans

In 2022, the bank's performance relative to HMDA-reportable loans was adequate. The bank's 2022 and 2021 HMDA-reportable lending in the assessment area was concentrated in home purchase and refinance loans. As such, multi-family, home improvement, other loan purpose, and loan purpose not applicable loans were not considered within the analysis.

#### *Home Purchase*

In 2022, the bank originated 7.0 percent of its home purchase loans to low-income borrowers, which was comparable to the aggregate lender rate of 7.6 percent and below the 21.5 percent of low-income families located in the assessment area. Among moderate-income borrowers, the bank originated 25.6 percent of its home purchase loans, which was above the aggregate lender rate of 23.2 percent, and above the 17.7 percent of moderate-income families located in the assessment area. Home purchase loans to middle-income borrowers at 23.3 percent was comparable to both the aggregate of lenders at 21.4 percent and to the assessment area demographics, at 21.3 percent. Among upper-income borrowers, the bank's performance of 37.2 percent exceeded the aggregate of lenders at 29.0 percent and was below the assessment area demographics at 39.5 percent. Lastly, the bank originated 7.0 percent of home purchase loans to families where income was unknown, which was below the aggregate lender rate of 18.8 percent. Within home purchase loans, the bank's overall performance in 2021 was comparable to 2022 figures.

#### *Refinance Loans*

In 2022, the bank originated 5.3 percent of its refinance loans to low-income borrowers, which was below the aggregate lender rate of 11.7 percent. Neither the bank nor the aggregate of lenders met the 21.5 percent of low-income families located in the assessment area. Among moderate-income borrowers, the bank originated 15.8 percent of its refinance loans, which was below the aggregate lender rate of 20.8 percent, and was comparable to the 17.7 percent of moderate-income families located in the assessment area. Refinance loans originated to middle-income borrowers at 36.8 percent, exceeded the aggregate of lenders at 24.0 percent and the assessment area demographics at 21.3 percent. Among upper-income

borrowers, the bank's performance of 31.6 percent was below the aggregate of lenders at 34.0 percent and the assessment area demographics at 39.5 percent. Lastly, the bank originated 10.5 percent of refinance loans to families where the income was unknown, comparable to the aggregate lender rate of 9.5 percent. Within refinanced loans, the bank's overall performance in 2021 was comparable to 2022 figures.

The following table presents the bank's 2022 HMDA-reportable lending in the assessment area; 2021 tables are available in Appendix B.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Terre Haute, IN MSA 45460							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	3	7.0	7.6	290	3.9	3.8	21.5
Moderate	11	25.6	23.2	1,186	16.1	16.2	17.7
Middle	10	23.3	21.4	1,856	25.3	20.9	21.3
Upper	16	37.2	29.0	3,587	48.8	40.8	39.5
Unknown	3	7.0	18.8	430	5.9	18.3	0.0
Total	43	100.0	100.0	7,349	100.0	100.0	100.0
Refinance Loans							
Low	1	5.3	11.7	40	1.9	6.5	21.5
Moderate	3	15.8	20.8	211	9.9	14.5	17.7
Middle	7	36.8	24.0	627	29.5	20.8	21.3
Upper	6	31.6	34.0	1,054	49.6	46.0	39.5
Unknown	2	10.5	9.5	195	9.2	12.2	0.0
Total	19	100.0	100.0	2,127	100.0	100.0	100.0
Home Improvement Loans							
Low	1	11.1	12.5	15	4.0	9.0	21.5
Moderate	2	22.2	22.1	119	31.8	19.2	17.7
Middle	1	11.1	23.2	15	4.0	20.2	21.3
Upper	4	44.4	35.1	150	40.1	43.2	39.5
Unknown	1	11.1	7.1	75	20.1	8.5	0.0
Total	9	100.0	100.0	374	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	5	7.0	9.3	345	3.5	4.6	21.5
Moderate	16	22.5	22.1	1,516	15.4	15.7	17.7
Middle	18	25.4	22.2	2,498	25.4	20.7	21.3
Upper	26	36.6	31.4	4,791	48.6	42.4	39.5
Unknown	6	8.5	15.0	700	7.1	16.5	0.0
Total	71	100.0	100.0	9,850	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

### Small Business Loans

The bank's performance relative to small business loans was good as the bank's rate of lending to businesses reporting annual revenues of \$1 million or less exceeded the rate of the aggregate of lenders and the percentage of businesses with \$1 million or less in annual revenues operating in the assessment area. In 2021, the bank originated all six loans or 100.0 percent of small business loans to businesses with revenues of \$1 million or less. This rate greatly exceeded the aggregate

lender rate of 38.0 percent and the percentage of total businesses in the assessment area at 89.2 percent. Of the small business loans, 100.0 percent were made in amounts of \$100,000 or less, which are considered most beneficial to small businesses. Overall, the bank's performance in 2022 was significantly below the figures in 2021, with only 27.9 percent of lending to businesses reporting annual revenues of \$1 million or less.

The following table presents the bank's 2021 small business lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Terre Haute, IN MSA 45460							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	6	100.0	38.0	218	100.0	37.5	89.2
Over \$1 Million	0	0.0		0	0.0		8.7
Revenue Unknown	0	0.0		0	0.0		2.1
Total	6	100.0		218	100.0		100.0
By Loan Size							
\$100,000 or Less	6	100.0	88.6	218	100.0	31.4	
\$100,001 - \$250,000	0	0.0	6.2	0	0.0	18.2	
\$250,001 - \$1 Million	0	0.0	5.2	0	0.0	50.4	
Total	6	100.0	100.0	218	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	6	100.0		218	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	6	100.0		218	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

### Small Farm Loans

The bank's performance relative to small farm loans was good as the bank's rate of lending to farms reporting annual revenues of \$1 million or less exceeded the rate of the aggregate of lenders and was comparable to the percentage of farms with \$1 million or less in annual revenues operating in the assessment area. In 2021, the bank originated all small farm loans or 100.0 percent to farms with revenues of \$1 million or less. This rate was significantly above the aggregate lender rate of 68.1 percent and aligns with the percentage of total farms in the assessment area at 99.4



percent. Of the small farm loans, 36.4 percent were made in amounts of \$100,000 or less to farms with annual revenues of \$1 million or less, which are considered most beneficial to small farms. Overall, the bank's performance in 2022 was comparable to the figures in 2021.

The following table presents the bank's 2021 small business lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Terre Haute, IN MSA 45460							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	11	100.0	68.1	1,509	100.0	81.7	99.4
Over \$1 Million	0	0.0		0	0.0		0.6
Revenue Unknown	0	0.0		0	0.0		0.0
Total	11	100.0		1,509	100.0		100.0
By Loan Size							
\$100,000 or Less	4	36.4	78.9	171	11.3	29.5	
\$100,001 - \$250,000	6	54.5	12.8	938	62.2	29.5	
\$250,001 - \$500,000	1	9.1	8.3	400	26.5	41.0	
Total	11	100.0	100.0	1,509	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	4	36.4		171	11.3		
\$100,001 - \$250,000	6	54.5		938	62.2		
\$250,001 - \$500,000	1	9.1		400	26.5		
Total	11	100.0		1,509	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

## Community Development Lending

FFBT makes few, if any community development loans. The bank did not originate any community development loans in the Terre Haute, IN MSA during the evaluation period. This is a significant decline when compared to the previous evaluation period when the bank originated seven loans for \$25.4 million.

## INVESTMENT TEST

FFBT made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. During the evaluation period, FFBT originated seven new investments totaling approximately \$1.3 million (funded) toward affordable housing purposes, through Low-Income Housing Tax Credits (LIHTC). FFBT makes occasional use of innovative and/or complex investments to support community initiatives. FFBT demonstrates adequate responsiveness to credit and community development needs, as there is a current lack of affordable, quality housing, and the housing stock is aging, according to the community representative. Overall, the volume of community development investments represents a significant increase, as during the previous evaluation period the bank did not make any investments in the Terre Haute, IN MSA assessment area.

Community Development Investments (Dollars in 000s)						
September 21, 2021 – November 6, 2023						
Assessment Area	Current Period Funded			Current Period Funded (\$)	Prior Period Funded (\$)	Total Unfunded (\$)
	Affordable Housing (\$)	Community Services (\$)	Economic Development (\$)			
Terre Haute, IN MSA #45460	1,252	0	0	1,252	0	0

FFBT distributed a total of \$20,500 in qualified grants and donations in the current evaluation period. The majority of the grants were dedicated to organizations providing community services which totaled \$15,500. The bank's total qualified grants decreased, even when factoring in the difference in evaluation periods, to the previous evaluation period when donations totaled \$64,100.

Community Development Grants/Donations (Dollars 000s)					
September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Community Services	Economic Development	Total	
	\$	\$	\$	\$	%
Terre Haute, IN MSA #45460	5,000	15,500	0	20,500	13.9

## SERVICE TEST

FFBT's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area, particularly moderate-income geographies or low- or moderate-income individuals. Finally, the bank provides an adequate level of community development services.

## Retail Services

FFBT retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area(s), particularly low- or moderate-income geographies or low- or moderate-income individuals.

The bank operates five branches, four full-service ATMs, and three cash-only ATMs within this assessment area. All branches and ATMs are located in middle- and upper-income tracts. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals, as the bank has not opened or closed any locations since the previous evaluation. Its services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals.

Most branches throughout the Terre Haute, IN MSA assessment area have standard hours from 9:00 a.m. to 4:00 p.m., Monday through Thursday and are open until 5:00 p.m. on Fridays with extended drive-thru hours including Saturdays. Applications for all loan and deposit products are accepted at each branch location. Additionally, mortgage applications are accepted online through the bank's website. Alternative delivery systems include ATMs, internet banking, and mobile banking.

## Community Development Services

FFBT provides an adequate level of community development services. Bank employees provided 288 hours, or 24.6 percent, of the 1,173 total hours of qualified community development services. All of the service hours were directed towards providing education opportunities to students coming from low-or moderate-income families. Overall, the bank's performance is a decrease over the previous evaluation's service hours totaling 351, however, once the duration difference between the two sample periods is adjusted for, the decrease is reasonable.

Community Development Services September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Community Services	Economic Development	Total Hours	% of Total
Terre Haute, IN MSA #45460	0	288	0	288	24.6

## INDIANAPOLIS, IN MSA – LIMITED REVIEW

### SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope of examination presented in the overall section of the performance evaluation.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN INDIANAPOLIS, IN MSA

The Indianapolis, IN MSA assessment area consists of Boone, Hamilton, and Madison Counties in their entireties. The assessment area has a total of 107 census tracts including six low-, 15 moderate-, 42 middle-, 43 upper, and one unknown-income census tract. The unknown-income census tract contains a correctional facility, driving the designation of this tract. The composition of the assessment area has changed slightly since the previous evaluation when there were 14 moderate-, 31 middle-, and 34 upper-income census tracts.

#### *Tract Designation Change Data*

*The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.*

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2021 Designations (#)	2022 Designations (#)	Net Change (#)
Low	6	6	0
Moderate	14	15	1
Middle	31	42	11
Upper	34	43	9
Unknown	1	1	0
Total	86	107	21
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 U.S. Census Bureau: Decennial Census: American Community Survey Data: 2016-2020			

The bank maintains three branches and four ATMs, all of which are located in middle-income census tracts. The bank has not opened or closed any branches in the assessment area since the previous evaluation, however, the bank did open a LPO in a middle-income census tract in Carmel, Indiana on December 1, 2022.

The FDIC Deposit Market Share Report dated June 30, 2022, ranked FFBT 21<sup>st</sup> among 30 FDIC-insured institutions serving the assessment area, with 0.6 percent market share. The first ranked institution, Merchants Bank of Indiana held 24.1 percent of the market share, followed by JP Morgan Chase Bank N.A. with 14.3 percent of the assessment area deposits.

Based on 2022 aggregate lending data, FFBT ranked 65<sup>th</sup> of 508 HMDA reporters in loan originations in the assessment area. A total of 72 originations were reported by FFBT, which was well below the leader in the market, The Huntington National Bank with 1,302 HMDA originations. Additionally, in 2021, the bank ranked 15<sup>th</sup> of 135 CRA reporters. The bank originated 280 CRA-reportable loans (228 small business and 52 small farm loans), which was well below the leader in the market, JP Morgan Chase Bank N.A. with 2,934 originations.

Information about census-related and business and farm demographic characteristics of the assessment area is provided in the following table.

2022 Indianapolis-Carmel-Anderson, IN MSA 26900 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	6	5.6	3,482	2.4	1,184	34.0	20,313	14.1
Moderate	15	14.0	11,847	8.2	1,446	12.2	20,780	14.4
Middle	42	39.3	51,301	35.6	3,268	6.4	28,572	19.8
Upper	43	40.2	77,396	53.7	1,714	2.2	74,361	51.6
Unknown	1	0.9	0	0.0	0	0.0	0	0.0
Total AA	107	100.0	144,026	100.0	7,612	5.3	144,026	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	7,473	2,504	1.7	33.5	3,353	44.9	1,616	21.6
Moderate	23,698	12,509	8.3	52.8	7,575	32.0	3,614	15.3
Middle	82,550	54,047	36.0	65.5	21,942	26.6	6,561	7.9
Upper	102,599	81,042	54.0	79.0	17,192	16.8	4,365	4.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	216,320	150,102	100.0	69.4	50,062	23.1	16,156	7.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	440	1.7	404	1.7	34	1.8	2	0.6
Moderate	1,817	7.0	1,661	6.9	139	7.6	17	5.5
Middle	9,864	37.7	8,869	37.0	873	47.5	122	39.4
Upper	14,006	53.6	13,046	54.4	792	43.1	168	54.2
Unknown	3	0.0	1	0.0	1	0.1	1	0.3
Total AA	26,130	100.0	23,981	100.0	1,839	100.0	310	100.0
Percentage of Total Businesses:				91.8		7.0		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	34	6.2	32	5.9	2	28.6	0	0.0
Middle	365	66.4	362	66.7	3	42.9	0	0.0
Upper	151	27.5	149	27.4	2	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	550	100.0	543	100.0	7	100.0	0	0.0
Percentage of Total Farms:				98.7		1.3		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Assessment Area	Lending Test	Investment Test	Service Test
Indianapolis-Carmel-Anderson, IN MSA #26900	Consistent	Consistent	Consistent

The institution's lending, investment, and service test performance in the Indianapolis, IN MSA is consistent with the institution's performance overall in the state of Indiana.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	1.2	0	0.0	0.4	1.7
Moderate	1	5.3	6.1	57	1.0	2.6	8.3
Middle	11	57.9	39.9	3,042	55.8	34.3	36.0
Upper	7	36.8	52.7	2,352	43.1	62.7	54.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	5,451	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.0	0	0.0	0.4	1.7
Moderate	2	6.7	6.2	160	2.9	2.9	8.3
Middle	24	80.0	36.4	3,768	68.5	29.0	36.0
Upper	4	13.3	56.4	1,569	28.5	67.7	54.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	30	100.0	100.0	5,497	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.6	0	0.0	0.2	1.7
Moderate	1	11.1	4.4	25	2.7	2.4	8.3
Middle	8	88.9	30.6	918	97.3	24.1	36.0
Upper	0	0.0	64.4	0	0.0	73.2	54.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	943	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	4.3	0	0.0	1.2	2.5
Moderate	0	0.0	17.1	0	0.0	3.8	9.9
Middle	0	0.0	52.9	0	0.0	58.9	44.7
Upper	0	0.0	25.7	0	0.0	36.1	42.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.1	0	0.0	0.5	1.7
Moderate	4	6.9	6.0	242	2.0	2.8	8.3
Middle	43	74.1	37.4	7,728	65.0	35.5	36.0
Upper	11	19.0	55.5	3,921	33.0	61.2	54.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	58	100.0	100.0	11,891	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							



Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans							
Low	2	10.5	5.7	170	3.1	2.2	14.1
Moderate	7	36.8	15.3	1,449	26.6	9.7	14.4
Middle	5	26.3	20.1	1,216	22.3	17.4	19.8
Upper	5	26.3	42.0	2,616	48.0	54.8	51.6
Unknown	0	0.0	16.9	0	0.0	16.0	0.0
Total	19	100.0	100.0	5,451	100.0	100.0	100.0
Refinance Loans							
Low	4	13.3	10.4	312	5.7	5.1	14.1
Moderate	12	40.0	19.4	1,223	22.2	13.1	14.4
Middle	6	20.0	21.6	1,006	18.3	19.0	19.8
Upper	8	26.7	39.8	2,956	53.8	52.8	51.6
Unknown	0	0.0	8.8	0	0.0	9.9	0.0
Total	30	100.0	100.0	5,497	100.0	100.0	100.0
Home Improvement Loans							
Low	1	11.1	5.4	25	2.7	2.8	14.1
Moderate	2	22.2	13.1	35	3.7	8.6	14.4
Middle	1	11.1	20.5	100	10.6	15.2	19.8
Upper	5	55.6	58.5	783	83.0	70.9	51.6
Unknown	0	0.0	2.5	0	0.0	2.6	0.0
Total	9	100.0	100.0	943	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	7	12.1	7.0	507	4.3	2.9	14.1
Moderate	21	36.2	16.0	2,707	22.8	10.3	14.4
Middle	12	20.7	20.5	2,322	19.5	17.4	19.8
Upper	18	31.0	43.9	6,355	53.4	55.4	51.6
Unknown	0	0.0	12.7	0	0.0	14.0	0.0
Total	58	100.0	100.0	11,891	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2021 Small Business Lending By Income Level of Geography Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	1.6	0	0.0	2.0	2.5
Moderate	0	0.0	7.5	0	0.0	8.7	9.6
Middle	4	50.0	19.3	812	49.8	17.4	20.9
Upper	4	50.0	71.3	818	50.2	71.7	67.0
Unknown	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.3	0	0.0	0.1	
Total	8	100.0	100.0	1,630	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.2	0	0.0	2.3	2.2
Middle	13	81.3	81.5	2,661	86.1	85.8	70.4
Upper	3	18.8	15.5	431	13.9	11.9	27.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.1	
Total	16	100.0	100.0	3,092	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	5	62.5	49.0	867	53.2	31.9	91.9
Over \$1 Million	1	12.5		358	22.0		7.0
Revenue Unknown	2	25.0		405	24.8		1.1
Total	8	100.0		1,630	100.0		100.0
By Loan Size							
\$100,000 or Less	2	25.0	89.6	94	5.8	31.0	
\$100,001 - \$250,000	3	37.5	5.7	378	23.2	19.4	
\$250,001 - \$1 Million	3	37.5	4.7	1,158	71.0	49.6	
Total	8	100.0	100.0	1,630	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	2	40.0		94	10.8		
\$100,001 - \$250,000	2	40.0		273	31.5		
\$250,001 - \$1 Million	1	20.0		500	57.7		
Total	5	100.0		867	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	14	87.5	56.8	2,889	93.4	71.3	98.7
Over \$1 Million	1	6.3		85	2.7		1.3
Revenue Unknown	1	6.3		118	3.8		0.0
Total	16	100.0		3,092	100.0		100.0
By Loan Size							
\$100,000 or Less	5	31.3	79.0	267	8.6	21.9	
\$100,001 - \$250,000	6	37.5	11.4	1,178	38.1	27.2	
\$250,001 - \$500,000	5	31.3	9.6	1,647	53.3	50.8	
Total	16	100.0	100.0	3,092	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	4	28.6		182	6.3		
\$100,001 - \$250,000	5	35.7		1,060	36.7		
\$250,001 - \$500,000	5	35.7		1,647	57.0		
Total	14	100.0		2,889	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Community Development Loans (Dollars in 000s) September 21, 2021 – November 6, 2023										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalization and Stabilization		Total	
	\$	#	\$	#	\$	#	\$	#	\$	#
Indianapolis-Carmel-Anderson, IN MSA #26900	19,162	2	9,913	2	0	0	0	0	29,075	4

Community Development Investments (Dollars in 000s) September 21, 2021 – November 6, 2023						
Assessment Area	Current Period Funded			Current Period Funded (\$)	Prior Period Funded (\$)	Total Unfunded (\$)
	Affordable Housing (\$)	Community Services (\$)	Economic Development (\$)			
Indianapolis-Carmel-Anderson, IN MSA #26900	110	0	2,785	2,895	0	0

Community Development Grants/Donations (Dollars in 000s)					
September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Community Services	Economic Development	Total	
	\$	\$	\$	\$	%
Indianapolis-Carmel-Anderson, IN MSA #26900	0	15,000	0	15,000	10.1

Community Development Services					
September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Economic Development	Community Services	Total Hours	% of Total
Indianapolis-Carmel-Anderson, IN MSA #26900	0	180	0	180	15.3

## LAFAYETTE, IN MSA – LIMITED REVIEW

### SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope of examination presented in the overall section of the performance evaluation.

### DESCRIPTION OF INSTITUTION’S OPERATIONS LAFAYETTE, IN MSA

The Lafayette, IN MSA assessment area consists of Carroll and Tippecanoe Counties in their entirety. The assessment area has a total of 50 census tracts including three low-, 10 moderate-, 23 middle-, 10 upper-, and four unknown-income census tracts. Purdue University is located within the tracts designated as “unknown-income”, accounting for the designation. The composition of the assessment area has changed slightly since the previous evaluation when there were 16 middle-, 12 upper- income census tracts, and 3 unknown-income tracts.

#### *Tract Designation Change Data*

*The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau’s American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.*

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2021 Designations (#)	2022 Designations (#)	Net Change (#)
Low	3	3	0
Moderate	10	10	0
Middle	16	23	7
Upper	12	10	-2
Unknown	3	4	1
<b>Total</b>	<b>44</b>	<b>50</b>	<b>6</b>
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020			

The bank maintains two branches and two cash-only ATMs of which one branch is in a low-income tract and one is in an upper- income census tract. The bank has not opened or closed any branches in the assessment area since the previous evaluation.

The FDIC Deposit Market Share Report dated June 30, 2022, ranked FFBT 12<sup>th</sup> among 16 FDIC-insured financial institutions, with a 1.3 percent market share in the assessment area. In comparison, the first ranked institution, JP Morgan Chase Bank N.A. held 30.4 percent of the market share, followed by First Merchants Bank with 24.6 percent of the assessment area deposits.

Based on 2022 aggregate lending data, FFBT ranked 29<sup>th</sup> out of 266 HMDA reporters in loan originations in the assessment area. A total of 38 originations were reported by FFBT, which was well below the leader in the market, Purdue Federal Credit Union with 951 HMDA originations. Additionally in 2021, FFBT ranked fifth out of 75 CRA reporters. The bank originated 221 CRA-reportable loans (177 small business and 44 small farm loans), which was well below the leader in the market, JP Morgan Chase Bank N.A. with 536 originations.

Information about census-related and business and farm demographic characteristics of the assessment area is provided in the following table.

2022 Lafayette-West Lafayette, IN MSA 29200 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	6.0	2,398	5.2	629	26.2	9,782	21.4
Moderate	10	20.0	6,452	14.1	787	12.2	7,814	17.1
Middle	23	46.0	23,005	50.2	1,809	7.9	9,416	20.6
Upper	10	20.0	13,897	30.3	482	3.5	18,795	41.0
Unknown	4	8.0	55	0.1	33	60.0	0	0.0
Total AA	50	100.0	45,807	100.0	3,740	8.2	45,807	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,845	1,111	2.4	19.0	4,155	71.1	579	9.9
Moderate	15,256	5,668	12.3	37.2	7,888	51.7	1,700	11.1
Middle	41,531	23,638	51.4	56.9	15,072	36.3	2,821	6.8
Upper	20,296	15,584	33.9	76.8	3,393	16.7	1,319	6.5
Unknown	3,843	0	0.0	0.0	3,300	85.9	543	14.1
Total AA	86,771	46,001	100.0	53.0	33,808	39.0	6,962	8.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	576	8.6	517	8.3	59	13.3	0	0.0
Moderate	1,635	24.4	1,474	23.8	144	32.5	17	27.4
Middle	2,672	39.9	2,486	40.1	160	36.1	26	41.9
Upper	1,608	24.0	1,521	24.5	69	15.6	18	29.0
Unknown	211	3.1	199	3.2	11	2.5	1	1.6
Total AA	6,702	100.0	6,197	100.0	443	100.0	62	100.0
Percentage of Total Businesses:				92.5		6.6		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.5	1	0.3	1	9.1	0	0.0
Moderate	9	2.2	9	2.3	0	0.0	0	0.0
Middle	295	73.0	285	72.5	10	90.9	0	0.0
Upper	98	24.3	98	24.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	404	100.0	393	100.0	11	100.0	0	0.0
Percentage of Total Farms:				97.3		2.7		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Assessment Area	Lending Test	Investment Test	Service Test
Lafayette-West Lafayette, IN MSA#29200	Consistent	Consistent	Below

The institution's lending and investment test performance in the Lafayette-West Lafayette, Indiana MSA is consistent with the institution's performance overall in the state of Indiana. However, the lack of community development services in this assessment area contribute to a service test performance that is below that of the state of Indiana.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Lafayette-West Lafayette, IN MSA 29200							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	3.3	0	0.0	2.1	2.4
Moderate	3	27.3	15.5	546	20.4	10.7	12.3
Middle	6	54.5	44.8	1,656	61.9	43.7	51.4
Upper	2	18.2	36.4	472	17.7	43.4	33.9
Unknown	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	2,674	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.0	0	0.0	1.2	2.4
Moderate	4	26.7	11.8	573	20.7	8.9	12.3
Middle	9	60.0	53.6	1,519	55.0	52.4	51.4
Upper	2	13.3	32.5	670	24.3	37.4	33.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	2,762	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.5	0	0.0	2.1	2.4
Moderate	0	0.0	9.8	0	0.0	6.6	12.3
Middle	5	100.0	47.4	158	100.0	44.6	51.4
Upper	0	0.0	40.4	0	0.0	46.6	33.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	158	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	17.8	0	0.0	4.2	9.5
Moderate	1	100.0	39.7	2,200	100.0	37.4	22.7
Middle	0	0.0	31.5	0	0.0	55.4	42.8
Upper	0	0.0	9.6	0	0.0	2.2	7.7
Unknown	0	0.0	1.4	0	0.0	0.9	17.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	2,200	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	2.8	0	0.0	2.3	2.4
Moderate	8	25.0	14.1	3,319	42.6	15.3	12.3
Middle	20	62.5	47.7	3,333	42.8	48.0	51.4
Upper	4	12.5	35.3	1,142	14.7	34.2	33.9
Unknown	0	0.0	0.1	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	32	100.0	100.0	7,794	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Lafayette-West Lafayette, IN MSA 29200							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	7.2	0	0.0	4.0	21.4
Moderate	1	9.1	20.5	250	9.3	14.9	17.1
Middle	4	36.4	21.7	774	28.9	20.6	20.6
Upper	5	45.5	37.1	1,554	58.1	47.8	41.0
Unknown	1	9.1	13.5	96	3.6	12.6	0.0
Total	11	100.0	100.0	2,674	100.0	100.0	100.0
Refinance Loans							
Low	1	6.7	12.8	150	5.4	7.6	21.4
Moderate	2	13.3	24.2	201	7.3	19.2	17.1
Middle	3	20.0	23.0	524	19.0	22.7	20.6
Upper	8	53.3	30.4	1,532	55.5	39.7	41.0
Unknown	1	6.7	9.6	355	12.9	10.8	0.0
Total	15	100.0	100.0	2,762	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	7.4	0	0.0	4.4	21.4
Moderate	1	20.0	17.0	25	15.8	11.8	17.1
Middle	3	60.0	26.8	108	68.4	25.8	20.6
Upper	1	20.0	44.7	25	15.8	54.7	41.0
Unknown	0	0.0	4.0	0	0.0	3.4	0.0
Total	5	100.0	100.0	158	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	3.2	9.2	150	2.7	5.0	21.4
Moderate	4	12.9	21.0	476	8.5	15.8	17.1
Middle	10	32.3	22.5	1,406	25.1	21.3	20.6
Upper	14	45.2	35.8	3,111	55.6	46.1	41.0
Unknown	2	6.5	11.5	451	8.1	11.8	0.0
Total	31	100.0	100.0	5,594	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2021 Small Business Lending By Income Level of Geography Assessment Area: Lafayette-West Lafayette, IN MSA 29200							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	2.7	0	0.0	2.7	4.0
Moderate	2	20.0	28.7	30	3.2	42.0	28.8
Middle	6	60.0	33.8	613	64.4	24.9	32.4
Upper	2	20.0	32.6	309	32.5	27.9	31.4
Unknown	0	0.0	1.8	0	0.0	2.5	3.4
Tract-Unk	0	0.0	0.5	0	0.0	0.1	
Total	10	100.0	100.0	952	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Lafayette-West Lafayette, IN MSA 29200							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.3	0	0.0	0.2	0.2
Moderate	0	0.0	1.8	0	0.0	0.3	2.9
Middle	17	94.4	74.1	3,201	93.6	78.4	61.3
Upper	1	5.6	22.3	220	6.4	21.0	35.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.5	0	0.0	0.1	
Total	18	100.0	100.0	3,421	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Lafayette-West Lafayette, IN MSA 29200							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	7	70.0	45.9	343	36.0	30.4	92.3
Over \$1 Million	3	30.0		609	64.0		6.8
Revenue Unknown	0	0.0		0	0.0		0.9
Total	10	100.0		952	100.0		100.0
By Loan Size							
\$100,000 or Less	8	80.0	88.7	380	39.9	30.5	
\$100,001 - \$250,000	0	0.0	6.5	0	0.0	21.1	
\$250,001 - \$1 Million	2	20.0	4.8	572	60.1	48.4	
Total	10	100.0	100.0	952	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	7	100.0		343	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	7	100.0		343	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Lafayette-West Lafayette, IN MSA 29200							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	15	83.3	63.9	2,841	83.0	68.9	97.3
Over \$1 Million	3	16.7		580	17.0		2.7
Revenue Unknown	0	0.0		0	0.0		0.0
Total	18	100.0		3,421	100.0		100.0
By Loan Size							
\$100,000 or Less	5	27.8	71.7	297	8.7	18.2	
\$100,001 - \$250,000	7	38.9	13.6	1,164	34.0	24.5	
\$250,001 - \$500,000	6	33.3	14.8	1,960	57.3	57.4	
Total	18	100.0	100.0	3,421	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	4	26.7		247	8.7		
\$100,001 - \$250,000	6	40.0		1,034	36.4		
\$250,001 - \$500,000	5	33.3		1,560	54.9		
Total	15	100.0		2,841	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Community Development Loans (Dollars in 000s)										
September 21, 2021 – November 6, 2023										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalization and Stabilization		Total	
	\$	#	\$	#	\$	#	\$	#	\$	#
Lafayette-West Lafayette IN MSA #29200	0	0	0	0	0	0	0	0	0	0

Community Development Investments (Dollars in 000s)						
September 21, 2021 – November 6, 2023						
Assessment Area	Current Period Funded			Current Period Funded (\$)	Prior Period Funded (\$)	Total Unfunded (\$)
	Affordable Housing (\$)	Community Services (\$)	Economic Development (\$)			
Lafayette-West Lafayette, IN MSA #29200	0	0	0	0	0	0

Community Development Grants/Donations (Dollars 000s)					
September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Community Services	Economic Development	Total	
	\$	\$	\$	\$	%
Lafayette-West Lafayette, IN MSA #29200	7,500	10,000	0	17,500	11.8

Community Development Services					
September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Economic Development	Community Services	Total Hours	% of Total
Lafayette-West Lafayette, IN MSA #29200	0	0	0	0	0.0

## STATE OF ILLINOIS

### CRA RATING FOR ILLINOIS<sup>3</sup>

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

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

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

FFBT's performance relative to the Lending Test in the state of Illinois is rated Low Satisfactory based on the following factors as determined by the full-scope assessment areas: the bank demonstrates adequate geographic distribution, particularly to low- and moderate-income geographies in its assessment area. The bank displays an adequate distribution of loans among individuals of different incomes and businesses of different sizes, given the product lines offered by the bank. The bank exhibits an adequate record of serving the credit needs of low- and moderate-income individuals and small businesses and farms with gross annual revenues of \$1 million or less. The bank makes limited use of innovative or flexible practices in serving assessment area credit needs. Further, the bank makes few, if any community development loans.

FFBT's performance relative to the Investment Test in the state of Illinois is rated Needs to Improve. The bank makes a poor level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. The bank makes rare use of innovative and/or complex investments to support community development initiatives. The bank exhibits adequate responsiveness to credit and community development needs.

FFBT's performance relative to the Service Test in the state of Illinois is Low Satisfactory based on the following factors: delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment area; record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals; services do not vary in a way that inconveniences the needs of its assessment area, particularly low- and moderate-income geographies and/or low- and moderate-income individuals; and the bank provides few, if any community development services.

### SCOPE OF EXAMINATION

Performance within the state of Illinois was evaluated using full review examination procedures for the Danville, IL MSA #19180 assessment area. Limited review procedures were used to evaluate the Illinois Non-MSA, given the bank's limited presence in the area. The scope of the examination is consistent with that which is defined for the whole review; see the more detailed description of the scope contained in the introduction section.

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<sup>3</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.



## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN ILLINOIS**

FFBT maintains operations in the state of Illinois through five offices and seven full-service and three cash-only ATMs. The bank operates in two individual assessment areas within the state including the following: Danville, IL MSA #19180, and Illinois Non-MSA. Information regarding relevant demographic and economic conditions is discussed under each individual assessment area.

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

### **LENDING TEST**

FFBT performance relative to the Lending Test in the state of Illinois is Low Satisfactory based on adequate distribution throughout the assessment areas in the state of Illinois and lending activities reflect adequate distribution, particularly in its assessment areas, of loans among individuals of different income levels and businesses (including farms) of different sizes. The bank exhibits an adequate record of serving the credit needs of low- and moderate-income individuals and small businesses and farms with gross annual revenues of \$1 million or less. The bank makes limited use of innovative or flexible practices in serving assessment area credit needs. Further, the bank makes few, if any community development loans. The rating is primarily attributed to the bank's performance in the Danville, IL MSA #19180 due to the branching network of these areas and overall lending presence.

The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

### **Geographic Distribution of Loans**

FFBT's lending activities reflect adequate distribution throughout the assessment areas in the state of Illinois. The conclusions were based primarily on the bank's record of lending to consumers, businesses, and farms in the Danville, IL MSA assessment area.

### **Lending to Borrowers of Different Income Levels and Lending to Businesses and Farms of Different Sizes**

FFBT's lending activities reflect adequate distribution, particularly in its assessment areas, of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank. In most instances, the bank was below the aggregate of lenders in the state who lend to small businesses and small farm loans reporting annual revenues of \$1 million or less.

## Community Development Lending

FFBT makes few, if any community development loan in the state of Illinois. The bank did not originate any community development loans during the evaluation period. At the previous evaluation, the bank made 11 qualified community development loans totaling approximately \$11.1 million.

## INVESTMENT TEST

FFBT's performance relative to the Investment Test in the state of Illinois Needs to Improve. FFBT made a poor level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. The bank makes rare use of innovative and/or complex investments to support community initiatives. FFBT demonstrates adequate responsiveness to credit and community development needs. FFBT had a \$55,000 current period investment to support an affordable housing project. Please see the Danville, IL MSA assessment area summary for further details.

The following table presents community development investments in the state of Illinois during the evaluation period.

Community Development Investments (Dollars in 000s) September 21, 2021 – November 6, 2023								
State of Illinois	Prior Period Investments		Current Period Investments		Total Investments		Unfunded Commitments	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000)
Affordable Housing	0	0	1	55	1	55	0	0
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Community Services	0	0	0	0	0	0	0	0
<b>Total</b>	0	0	1	55	1	55	0	0
<i>Note: Percentages may not add to 100.0 percent due to rounding.</i>								

FFBT made five donations totaling approximately \$17,000 in the state of Illinois during the evaluation period. This represents a decrease of 61.5 percent by number and 41.4 percent decrease by dollar amount from the previous evaluation. However, when factoring in the difference in evaluation periods, the decline is less significant, as the previous evaluation was a 48-month period, and the current evaluation is roughly a 26-month period. All of the donations were for community services, and all were made in the Danville, IL MSA assessment area. Please see the Danville, IL MSA assessment area summary for further details.

## **SERVICE TEST**

FFBT performance relative to the Service Test for the state of Illinois is Low Satisfactory. The bank's delivery systems are accessible to geographies and individuals of different income levels. Its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly low- and moderate-income geographies and to low- and moderate-income individuals. Services do not vary in a way that inconveniences low- and moderate-income individuals or geographies. Finally, the bank provides few, if any community development services.

### **Retail Services**

FFBT's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment areas, particularly low- or moderate-income geographies or low- or moderate-income individuals.

The bank maintains five full-service branch locations, seven full-service ATM/ITMs, and three cash-dispensing ATMs inside the combined assessment areas in the state of Illinois. The bank has not opened or closed any branches or ATMs since the previous CRA evaluation. However, since May of 2022, five ITMs have been opened in the state of Illinois. These ITMs alleviate branch resource issues while providing additional access to customers.

The bank's services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or individuals. Most branches have standard hours from 9:00 a.m. to 4:00 p.m., Monday through Thursday and are open until 5:00 p.m. on Fridays with extended drive-thru hours including Saturdays. Applications for all loan and deposit products are accepted at each location. Additionally, mortgage applications are accepted online through the bank's website. Alternative delivery systems include ATMs, ITMs, internet banking, and mobile banking.

### **Community Development Services**

FFBT provides few, if any community development services. The bank did not provide for any qualified services in the state of Illinois during the evaluation period. At the previous evaluation, community development service hours totaled 504. This decrease is significant, even accounting for the difference in the evaluation period.

## DANVILLE, IL MSA – FULL REVIEW

### SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope presented in the overall section of the performance evaluation.

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN DANVILLE, IL MSA

The Danville, IL MSA assessment area consists of Vermilion County in its entirety. The assessment area contains 24 total census tracts comprised of three low-, two moderate-, 12 middle-, and six upper-income census tracts. There is one census tract where the income is unknown; this tract is home to two railroad companies, the Norfolk and Western railroads. The composition of the assessment area has changed slightly since the previous evaluation when there was one low, five moderate-, 10 middle-, and eight upper- income census tracts.

#### *Tract Designation Change Data*

*The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau’s American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.*

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2021 Designations (#)	2022 Designations (#)	Net Change (#)
<b>Low</b>	1	3	2
<b>Moderate</b>	5	2	-3
<b>Middle</b>	10	12	2
<b>Upper</b>	8	6	-2
<b>Unknown</b>	0	1	1
<b>Total</b>	24	24	0
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020			

There are two branches and three full-service and two cash-only ATMs throughout the assessment area. All of the branches and ATMs are located in upper-income census tracts. Since the previous evaluation, the bank has not opened or closed any branches or ATMs in the assessment area. However, since the previous evaluation, seven ITMs have been installed to alleviate branch resources and improve customer access.

The FDIC Deposit Market Share Report dated June 30, 2022, ranked FFBT fourth among 15 FDIC-insured institutions serving the assessment area, with 9.3 percent market share. The first ranked institution, Iroquois Federal Savings and Loan Association had 25.9 percent of the market share followed by Old National Bank with 23.4 percent of the assessment area deposits.

Based on 2022 aggregate lending data, FFBT ranked ninth of 117 HMDA reporters in loan originations in the assessment area. A total of 39 originations were reported by FFBT, which was well below the leader in the market, Catlin Bank with 179 HMDA originations. Additionally in 2021, FFBT ranked fourth of 61 CRA reporters. FFBT originated 99 CRA-reportable loans (84 small business and 15 small farm loans), with American Express National Bank leading all banks with 113 originations. Overall, FFBT ranked among the top third of all financial services participant in the assessment area, with respect to deposits and loans. Information about census-related and business demographic characteristics of the assessment area is provided in the following table.

2022 Danville, IL MSA 19180 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	12.5	1,669	8.8	793	47.5	4,325	22.7
Moderate	2	8.3	1,490	7.8	443	29.7	3,505	18.4
Middle	12	50.0	9,909	52.0	1,128	11.4	3,518	18.5
Upper	6	25.0	5,597	29.4	329	5.9	7,693	40.4
Unknown	1	4.2	376	2.0	101	26.9	0	0.0
Total AA	24	100.0	19,041	100.0	2,794	14.7	19,041	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,552	1,237	5.6	34.8	1,568	44.1	747	21.0
Moderate	3,248	1,362	6.2	41.9	1,183	36.4	703	21.6
Middle	18,791	11,951	54.4	63.6	4,392	23.4	2,448	13.0
Upper	9,681	7,041	32.1	72.7	1,676	17.3	964	10.0
Unknown	763	373	1.7	48.9	230	30.1	160	21.0
Total AA	36,035	21,964	100.0	61.0	9,049	25.1	5,022	13.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	316	14.7	255	13.4	55	27.4	6	11.8
Moderate	211	9.8	182	9.6	29	14.4	0	0.0
Middle	1,064	49.5	950	50.1	86	42.8	28	54.9
Upper	508	23.6	467	24.6	24	11.9	17	33.3
Unknown	51	2.4	44	2.3	7	3.5	0	0.0
Total AA	2,150	100.0	1,898	100.0	201	100.0	51	100.0
Percentage of Total Businesses:				88.3		9.3		2.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	84	46.7	81	46.3	2	50.0	1	100.0
Upper	96	53.3	94	53.7	2	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	180	100.0	175	100.0	4	100.0	1	100.0
Percentage of Total Farms:				97.2		2.2		0.6
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

## Population Characteristics

The following table presents the population trends for the assessment area (Vermilion County) which is the entirety of the Danville, IL MSA and the state of Illinois from 2015 to 2020. The population loss in the Danville, IL MSA at 7.7 percent is much greater than the state of Illinois, which experienced population loss at 0.5 percent. Community representatives cited high taxes as a reason that people are moving from the area, noting that some people relocate to live in Indiana and commute to the assessment area for work to avoid Illinois taxes.

Population Change			
Area	2015 Population	2020 Population	Percentage Change (%)
Assessment Area	80,368	74,188	-7.7
State of Illinois	12,873,761	12,812,508	-0.5
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

## Income Characteristics

Based upon the 2022 FFIEC Census Data, the assessment area had 41.1 percent of its families by family income classified as either low- (22.7 percent) or moderate-income (18.4 percent). The percentage of families residing within the assessment area that live below the poverty line is 14.7 percent, which is above the state of Illinois rate of 8.5 percent. The median family income (MFI) in the Danville, IL MSA increased by 3.6 percent, experiencing much slower growth than the state of Illinois at 10.3 percent. Community representatives noted MFI in the assessment area is not keeping up with inflation.

The following table presents income characteristics between 2015 and 2020 in the assessment area and the state of Illinois.

Median Family Income Change			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percentage Change (%)
Assessment Area	58,868	60,958	3.6
State of Illinois	78,169	86,251	10.3
Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.			

## Housing Characteristics

According to the 2022 FFIEC Census Data, the assessment area contains a total of 36,035 housing units; the majority are owner-occupied, representing 61.0 percent of the units, followed by 25.1 percent rental units, and 13.9 percent vacant housing units. Of the housing units located in the assessment area, 3,552 units, or 9.9 percent are in low-income census tracts and 3,248 units, or 9.0 percent are in moderate-income census tracts. The percentage of owner-occupied housing units in low-income and moderate-income census tracts is 34.8 percent and 41.9 percent respectively, indicating that opportunities for home mortgage, refinances, and home improvement lending are limited in those census tracts.

The following table presents the recent housing cost burden for assessment area and the state of Illinois. The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0 percent or more of their income on housing costs.

Renters across all income levels in the assessment area experience this burden at 37.1 percent. Low-income renters in the assessment area experience a housing cost burden of 64.1 percent, which is lower than the state rate of 73.2 percent. Similarly, low-income renters experience this burden at a rate of 50.8 percent, also below the state rate of 66.2 percent. Low-income renters and owners experience a housing cost burden greater than moderate-income renters and owners.

According to FFIEC HMDA loan and application records, home mortgage trends reflect increases in home mortgage activity in recent years across the assessment area's county and the broader region. These trends suggest a continued increase in demand for home purchases, driving up home values and indicating that housing cost burden for low-and moderate-income homeowners will remain elevated.

According to a community representative, the assessment area has one of the most affordable housing markets. There is a shortage of homes available for sale which has increased rents substantially. A representative stated that the homes available for purchase are in poor condition and there is a significant need for home improvement/rehabilitation loans. A representative also noted that rents within the assessment area are rising rapidly, causing the housing supply that is affordable to dwindle.



Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	64.1	20.6	37.1	50.8	12.4	13.3
State of Illinois	73.2	29.2	42.7	66.2	33.2	21.7
<i>Cost Burden is housing cost that equals 30.0 percent or more of household income</i> <i>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy</i>						

## Employment Characteristics

The following table presents unemployment rates between 2017 and 2021 in Vermilion County and the state of Illinois. Overall, the county experienced decreased unemployment rates in 2021. A notable increase is observed in 2020 due to the widespread economic downturn caused by the COVID-19 pandemic. Vermilion County consistently experienced a higher unemployment rate than the state of Illinois. In 2021, the unemployment rate for Vermilion County was 6.5 percent, compared to the state of Illinois at 6.1 percent. Community representatives noted that while unemployment rates in the assessment area are higher, there are plenty of opportunities for jobs within the manufacturing industry. However, a representative noted that a primary reason positions are available is due to the low wages.

Recent Unemployment Rates (%)					
Area	2017	2018	2019	2020	2021
Assessment Area	6.5	6.1	4.9	9.0	6.5
State of Illinois	4.9	4.4	4.0	9.2	6.1
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics (LAUS)</i>					

## Industry Characteristics

According to data from the U.S. Bureau of Labor Statistics, the assessment area is most heavily impacted by the manufacturing and retail trade industry, along with health care and social assistance organizations.

## Community Representatives

Two community representatives, with a focus on economic development and affordable housing, were contacted to increase understanding of the credit needs and market conditions within the assessment area. The representatives noted that banks are willing to provide assistance in the

communities. One representative noted that a loan program to assist with home improvement projects would benefit the community as the housing stock is older. Representatives noted a continued need for affordable housing and increased need for financial literacy courses. Both representatives noted that local industries are not paying high enough wages to sustain a comfortable life.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DANVILLE, IL MSA**

### **LENDING TEST**

FFBT has an adequate geographic distribution of loans in the assessment area; an adequate distribution of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank; an adequate record of serving the credit needs of low-and moderate-income individuals, or small businesses and farms with gross annual revenues of \$1 million or less; makes limited use of innovative and flexible lending practices in serving assessment area credit needs; and makes few, if any CD loans.

For HMDA-reportable lending, 2022 figures were used to evaluate the bank's performance, while 2021 figures were used for comparison purposes. For CRA-reportable lending, 2021 figures were used to evaluate the bank's performance while 2022 figures were used for comparison given the availability of aggregate lender data. For purposes of this analysis, small business and HMDA-reportable loans were given more weight than small farm loans in determining conclusions due to higher volume. Finally, when determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics (e.g., percentage of owner-occupied housing units or percentage of borrowers by income levels) as it is a better measure of loan demand.

The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

### **Geographic Distribution of Loans**

FFBT's lending activities reflect adequate distribution throughout the assessment area. The bank's assessment area includes three low-income; two moderate-income; 12 middle-income; and six upper-income census tracts. There is one census tract where the income is unknown; neither the bank nor the aggregate lenders had lending in this tract. For purposes of this analysis, HMDA-reportable home purchase, refinance, and CRA-reportable small business loans were used as the primary factor for determining the rating. Small farm loans could not provide a meaningful analysis given 100.0 percent of all farms are located in either middle- or upper-income census

tracts.

In 2022, the bank's rate of HMDA-reportable lending within low and moderate-income census tracts was deemed adequate as the bank's performance was comparable to the aggregate lenders and below assessment area demographics in low-income census tracts, while performance in moderate-income census tracts was above the aggregate lenders and comparable to the assessment area demographics. Additionally, the bank's performance with respect to small business loans was adequate, although the bank's performance was below the aggregate lenders and the percentage of small businesses operating in moderate-income census tracts. The bank's performance with respect to small farm loans was adequate given the bank's performance was comparable to both the aggregate of lenders and the percentage of small farms operating in low- and moderate-income census tracts, even though the bank did not originate loans in such tracts. Finally, the bank's distribution of lending across geographies of different income levels in 2021 within home mortgage and loans to small businesses and farms was consistent with the distribution of loans in 2022.

A gap analysis was completed as part of the evaluation. In 2022, the bank made no loans in low-income tracts and made loans in one of two moderate-income census tracts. Overall, the bank made loans in 75.0 percent of the census tracts in this assessment area. The bank's retail service network within the Danville, IL MSA, along with low lending volumes impedes the ability to be competitive within these tracts. Based upon this analysis, there were no conspicuous, unexplained lending gaps in the assessment area.

### HMDA Reportable Loans

In 2022, the bank's rate of HMDA-reportable lending was adequate. The bank's 2022 HMDA-reportable lending in the assessment area was concentrated in home purchase and refinance loans, which comprised 82.9 percent of the 35 HMDA loans originated. Due to low volume, multi-family, home improvement, other loan purpose, and loan purpose not applicable loans were not considered within the analysis of HMDA-reportable lending.

### *Home Purchase Loans*

Home purchase loans represent 28.6 percent of the bank's HMDA-reportable loans located in the Danville, IL MSA assessment area in 2022. FFBT did not originate any home purchase loans within low-income census tracts. By comparison, the aggregate lender rate was 3.0 percent, and the 5.6 percent of the assessment area's owner-occupied units located in low-income census tracts. The bank did not originate any home purchase loans within moderate-income census tracts. By comparison, the aggregate lender rate was 2.4 percent, and the 6.2 percent of the assessment area's owner-occupied units located in moderate-income census tracts. Within middle-income census tracts, the bank originated 40.0 percent of its home purchase loans in 2022. The bank's performance was below the aggregate lender rate of 54.7

percent and the 54.4 percent of owner-occupied units located in middle-income census tracts. The bank originated 60.0 percent of its home purchase loans in upper-income tracts, which exceeded the aggregate of lender rate of 39.5 percent, and the owner-occupied units located in upper-income tracts at 32.1 percent. The bank's overall performance in 2021 was comparable to 2022 figures.

#### *Refinance Loans*

Refinance loans represent 54.3 percent of the bank's HMDA-reportable loans located in the Danville, IL MSA assessment area in 2022. FFBT did not originate any refinance loans within low-income census tracts. The bank's performance was below both the aggregate lender rate of 2.4 percent, and the 5.6 percent of the assessment area's owner-occupied units located in low-income census tracts. Within moderate-income census tracts, the bank originated 15.8 percent of its refinance loans. The bank's performance exceeded the aggregate lender rate of 3.6 percent and the assessment area's owner-occupied units located in moderate-income census tracts at 6.2 percent. Within middle-income census tracts, the bank originated 63.2 percent of its refinance loans. The bank's performance exceeded the aggregate lender rate of 58.6 percent, and the 54.4 percent of owner-occupied units located in middle-income census tracts. The bank originated 21.1 percent of its refinance loans in upper-income census tracts, which was below the aggregate of lenders at 34.4 percent and the owner-occupied units located in upper-income tracts at 32.1 percent. The bank's overall performance relative to refinance loans in 2021 was comparable to 2022 figures.

The following table presents the bank's 2022 HMDA-reportable lending in the assessment area; 2021 tables are available in Appendix B.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Danville, IL MSA 19180							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	3.0	0	0.0	1.8	5.6
Moderate	0	0.0	2.4	0	0.0	1.8	6.2
Middle	4	40.0	54.7	259	26.0	49.0	54.4
Upper	6	60.0	39.5	737	74.0	47.3	32.1
Unknown	0	0.0	0.4	0	0.0	0.1	1.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	996	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.4	0	0.0	1.6	5.6
Moderate	3	15.8	3.6	102	9.3	2.2	6.2
Middle	12	63.2	58.6	679	61.8	50.8	54.4
Upper	4	21.1	34.4	318	28.9	45.1	32.1
Unknown	0	0.0	0.9	0	0.0	0.3	1.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	1,099	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.7	0	0.0	6.8	5.6
Moderate	0	0.0	5.0	0	0.0	6.0	6.2
Middle	4	66.7	51.7	190	55.6	45.7	54.4
Upper	2	33.3	36.7	152	44.4	41.5	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	1.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	342	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	27.5
Moderate	0	0.0	25.0	0	0.0	27.3	8.7
Middle	0	0.0	50.0	0	0.0	60.4	45.7
Upper	0	0.0	16.7	0	0.0	9.5	15.5
Unknown	0	0.0	8.3	0	0.0	2.8	2.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	3.0	0	0.0	1.8	5.6
Moderate	3	8.6	3.2	102	4.2	3.0	6.2
Middle	20	57.1	56.0	1,128	46.3	50.2	54.4
Upper	12	34.3	37.2	1,207	49.5	44.7	32.1
Unknown	0	0.0	0.6	0	0.0	0.3	1.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	35	100.0	100.0	2,437	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

### Small Business Loans

FFBT's performance with respect to small business loans was adequate given the bank's performance was below the aggregate of lenders and the percentage of small businesses operating in low- and moderate-income census tracts. In 2021, the bank originated nine small business loans in the Danville, IL MSA assessment area. The bank did not originate any loans within low-income census tracts. By comparison, the aggregate lender rate in these tracts was 3.9 percent and the percentage of small businesses located in low-income census tracts was 3.0 percent. The bank did not originate any loans within moderate-income census tracts. By comparison, the aggregate lender rate in these tracts was 18.0 percent and the percentage of small businesses located in moderate-income census tracts was 24.1 percent. Within middle-income census tracts, the bank originated 77.8 percent of its small business loans. The bank's performance exceeded the performance of aggregate lenders at 40.1 percent and the percentage of small businesses at 44.4 percent in middle-income census tracts. Lastly, the bank's lending in upper-income census tracts at 22.2 percent was below the aggregate lenders at 37.1 percent and the percentage of small businesses at 28.5 percent operating in upper-income census tracts. The performance in 2022 is comparable to the 2021 performance.

The following table presents the bank's 2021 small business lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Business Lending By Income Level of Geography Assessment Area: Danville, IL MSA 19180							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	3.9	0	0.0	5.0	3.0
Moderate	0	0.0	18.0	0	0.0	14.7	24.1
Middle	7	77.8	40.1	1,162	96.5	46.9	44.4
Upper	2	22.2	37.1	42	3.5	33.0	28.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.9	0	0.0	0.4	
Total	9	100.0	100.0	1,204	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

### Small Farm Loans

The bank's performance with respect to small farm loans was adequate given the bank's performance was comparable to both the aggregate of lenders and the percentage of small farms

operating in low- and moderate-income census tracts, even though the bank did not originate loans in such tracts. A substantial majority of farms are located in middle- and upper-income census tracts. As detailed in the following table, 43.5 percent and 56.5 percent of farms are located in middle- and upper-income census tracts, respectively. Further, the lack of opportunity to lend to small farms in low- and moderate-income census tracts is supported by the aggregate lender performance of 0.7 percent. Within middle-income census tracts, the bank originated 25.0 percent of its small farm loans. The bank's performance was below the performance of aggregate lenders at 40.1 percent and the percentage of small farms at 43.5 percent in middle-income census tracts. Lastly, the bank's lending in upper-income census tracts at 75.0 percent exceeded the aggregate lenders at 59.1 percent and the percentage of small farms at 56.5 percent operating in upper-income census tracts. The performance in 2022 is comparable to the 2021 performance.

The following table presents the bank's 2021 small farm lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Danville, IL MSA 19180							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.7	0	0.0	0.3	0.0
Middle	1	25.0	40.1	165	31.2	46.3	43.5
Upper	3	75.0	59.1	364	68.8	53.4	56.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	529	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

### Lending to Borrowers of Different Income Levels and Lending to Businesses and Farms of Different Sizes

FFBT's lending activities reflect adequate distribution, particularly in its assessment area, of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank.

In 2022, the bank's performance relative to HMDA-reportable lending was adequate. Among low- income borrowers, the bank's performance was comparable to the aggregate of lenders and below the percentage of families by income. Among moderate-income borrowers, the bank's performance was below the aggregate of lenders and the percentage of moderate-

income families in the assessment area. In 2021, the bank's performance in lending to small businesses was adequate as the bank's lending to businesses reporting annual revenues of \$1 million or less exceeded the aggregate of lenders and was below the percentage of total businesses operating in the assessment area. In 2021, performance for loans to small farms was good as the bank's lending to farms reporting annual revenues of \$1 million or less exceeded the aggregate of lenders and the percentage of total farms operating in the assessment area.

### HMDA Reportable Loans

In 2022, the bank's performance relative to HMDA-reportable loans was adequate. The bank's 2021 and 2022 HMDA-reportable lending in the assessment area was concentrated in home purchase and refinance loans. As such, multi-family, home improvement, other loan purpose, and loan purpose not applicable loans were not considered within the analysis.

#### *Home Purchase*

In 2022, the bank originated 20.0 percent of its home purchase loans to low-income borrowers, which exceeded the aggregate lender rate of 7.2 percent and was comparable to the 22.7 percent of low-income families located in the assessment area. Among moderate-income borrowers, the bank originated 10.0 percent of its home purchase loans, which was below both the aggregate lender rate of 22.1 percent, and the 18.4 percent of moderate-income families located in the assessment area. Home purchase loans to middle-income borrowers at 40.0 percent was above the aggregate of lenders at 21.9 percent, and the assessment area demographics, at 18.5 percent. Among upper-income borrowers, the bank's performance of 30.0 percent was above the aggregate of lenders at 27.7 percent, and below the assessment area demographics at 40.4 percent. Lastly, the bank did not originate any home purchase loans where the income is unknown, while the aggregate lender rate was 21.1 percent. Within home purchase loans, the bank's overall performance in 2021 was comparable to 2022 figures.

#### *Refinance Loans*

In 2022, the bank did not originate any of its refinance loans to low-income borrowers. By comparison the aggregate lender rate was 7.6 percent, and the 22.7 percent low-income families located in the assessment area. Among moderate-income borrowers, the bank did not originate any loans; the aggregate lender rate was 20.2 percent, and the 18.4 percent of the assessment area is made up of moderate-income families. Refinance loans originated to middle-income borrowers at 10.5 percent was below the aggregate of lenders at 24.2 percent and the assessment area demographics at 18.5 percent. Among upper-income borrowers, the bank's performance of 89.5 percent exceeded the aggregate of lenders at 41.4 percent and the assessment area demographics at 40.4 percent. Lastly, the bank did not originate any loans



where the income was unknown, which was below the aggregate lender rate of 6.6 percent. Within refinanced loans, the bank's overall performance in 2021 was comparable to 2022 figures.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Danville, IL MSA 19180							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	2	20.0	7.2	120	12.0	3.9	22.7
Moderate	1	10.0	22.1	60	6.0	17.2	18.4
Middle	4	40.0	21.9	356	35.7	20.5	18.5
Upper	3	30.0	27.7	460	46.2	38.6	40.4
Unknown	0	0.0	21.1	0	0.0	19.9	0.0
Total	10	100.0	100.0	996	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	7.6	0	0.0	4.6	22.7
Moderate	0	0.0	20.2	0	0.0	14.0	18.4
Middle	2	10.5	24.2	218	19.8	22.5	18.5
Upper	17	89.5	41.4	881	80.2	51.1	40.4
Unknown	0	0.0	6.6	0	0.0	7.7	0.0
Total	19	100.0	100.0	1,099	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	8.3	0	0.0	6.0	22.7
Moderate	0	0.0	20.0	0	0.0	15.5	18.4
Middle	3	50.0	28.3	195	57.0	27.3	18.5
Upper	3	50.0	35.0	147	43.0	44.8	40.4
Unknown	0	0.0	8.3	0	0.0	6.4	0.0
Total	6	100.0	100.0	342	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	2	5.7	7.2	120	4.9	4.1	22.7
Moderate	1	2.9	21.0	60	2.5	16.2	18.4
Middle	9	25.7	22.7	769	31.6	21.0	18.5
Upper	23	65.7	31.7	1,488	61.1	41.5	40.4
Unknown	0	0.0	17.3	0	0.0	17.2	0.0
Total	35	100.0	100.0	2,437	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

### Small Business Loans

FFBT's performance relative to small business loans was adequate as the bank's rate of lending to businesses reporting annual revenues of \$1 million or less was above the rate of the aggregate of lenders, however, it was significantly below the percentage of businesses with \$1 million or less in annual revenues operating in the assessment area. In 2021, the bank originated five loans or 55.6 percent of small business loans to businesses with revenues of \$1 million or less. This rate was above the aggregate lender rate of 42.7 percent and significantly below the percentage of total businesses in the assessment area at 88.3 percent. Of the small business loans, 100.0 percent were made in amounts of \$100,000 or less to businesses with annual revenues of \$1 million or less, which are considered most beneficial to small businesses. Overall, the bank's performance in 2022 was comparable to 2021 performance.

The following table presents the bank's 2021 small business lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Danville, IL MSA 19180							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	5	55.6	42.7	149	12.4	30.3	88.3
Over \$1 Million	3	33.3		1,035	86.0		9.3
Revenue Unknown	1	11.1		20	1.7		2.3
Total	9	100.0		1,204	100.0		100.0
By Loan Size							
\$100,000 or Less	6	66.7	92.8	169	14.0	38.2	
\$100,001 - \$250,000	2	22.2	4.0	235	19.5	15.9	
\$250,001 - \$1 Million	1	11.1	3.2	800	66.4	45.9	
Total	9	100.0	100.0	1,204	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	5	100.0		149	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	5	100.0		149	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

### Small Farm Loans

FFBT's performance relative to small farm loans was good as the bank's rate of lending to farms reporting annual revenues of \$1 million or less was above the rate of the aggregate of lenders and the percentage of farms with \$1 million or less in annual revenues operating in the assessment area. In 2021, the bank originated four loans or 100 percent of small farm loans to farms with revenues of \$1 million or less. This rate exceeded the aggregate lender rate of 53.3 percent and comparable to the percentage of total farms in the assessment area at 96.7 percent. Of the small farm loans, 50.0 percent were made in amounts of \$100,000 or less to farms with annual revenues of \$1 million or less, which are considered most beneficial to small farms. Overall, the bank's performance in 2022 was below when compared to the figures in 2021.

The following table presents the bank's 2021 small farm lending in the assessment area; 2022 tables are available in Appendix B.

Distribution of 2021 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Danville, IL MSA 19180							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	4	100.0	53.3	529	100.0	74.0	96.7
Over \$1 Million	0	0.0		0	0.0		2.7
Revenue Unknown	0	0.0		0	0.0		0.5
Total	4	100.0		529	100.0		100.0
By Loan Size							
\$100,000 or Less	2	50.0	83.2	64	12.1	35.4	
\$100,001 - \$250,000	1	25.0	14.6	165	31.2	50.1	
\$250,001 - \$500,000	1	25.0	2.2	300	56.7	14.4	
Total	4	100.0	100.0	529	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	2	50.0		64	12.1		
\$100,001 - \$250,000	1	25.0		165	31.2		
\$250,001 - \$500,000	1	25.0		300	56.7		
Total	4	100.0		529	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

## Community Development Lending

FFBT makes few, if any community development loans. Overall, the bank did not originate any community development loans in the Danville, IL MSA during the evaluation period. At the previous evaluation, the bank originated three community development loans for \$1.4 million.

## INVESTMENT TEST

FFBT made a poor level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. During the evaluation period, FFBT originated one new investment totaling \$55,000 toward an affordable housing project on low- and moderate-income apartment rentals. FFBT makes rare use of innovative and/or complex investments to support community initiatives. FFBT demonstrates adequate responsiveness to credit and community development needs, as affordable housing has been identified by community representatives as a need in this assessment area. Overall, the volume of community development investments represents a significant decrease, as during the previous evaluation period the bank made one affordable housing investment totaling \$4.1 million in the Danville, IL MSA assessment area.

Community Development Investments (Dollars in 000s) September 21, 2021 – November 6, 2023						
Assessment Area	Current Period Funded			Current Period Funded (\$)	Prior Period Funded (\$)	Total Unfunded (\$)
	Affordable Housing (\$)	Community Services (\$)	Economic Development (\$)			
Danville, IL MSA #19180	55	0	0	55	0	0

FFBT distributed a total of \$17,000 in qualified grants and donations in the current evaluation period. All of the grants were providing community services. While bank's total qualified grants decreased from \$29,000, when factoring in the difference in evaluation periods, the performance is reasonable.

Community Development Grants/Donations (Dollars 000s) September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Community Services	Economic Development	Total	
	\$	\$	\$	\$	%
Danville, IL MSA #19180	0	17,000	0	17,000	11.5

## SERVICE TEST

FFBT's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of

opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area, particularly moderate-income geographies or low- or moderate-income individuals. Further, the bank provides few, if any community development services.

### **Retail Services**

FFBT's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment areas, particularly low- or moderate-income geographies or low- or moderate-income individuals.

The bank operates a total of two branches and three full-service and two cash-only ATMs in the assessment area. In addition, the bank has added five ITMs since the previous evaluation. The branches and ATMs are located in upper- income census tracts. The bank has not closed nor opened any branches or ATMs since the previous evaluation.

Bank locations are open Monday through Friday with standard hours from 9:00 a.m. to 5:00 p.m., and open on Saturdays with limited hours, typically until noon. All products and services are consistent among all branches. The bank offers free ATMs, ITMs, internet and mobile banking, and automated telephone banking service to meet the needs of the bank's assessment area.

### **Community Development Services**

FFBT provides few, if any community development services. No community development services were provided; during the previous evaluation, 216 service hours were provided.

## ILLINOIS NON-MSA – LIMITED REVIEW

### SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope of examination presented in the overall section of the performance evaluation.

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN ILLINOIS NON-MSA

The bank delineates the following Illinois counties in their entirety as part of the Illinois Non-MSA assessment area; Clark, Coles, Douglas, and Edgar Counties. The assessment area has a total of 27 census tracts including six moderate-, 18 middle-, and three upper-income census tracts. There are no low-income census tracts within the assessment area. No middle tracts have been designated as distressed or under-served during the evaluation period. The composition of the assessment area has changed slightly since the previous evaluation when there were four moderate-, 19 middle-, and 2 upper-, and one unknown-income census tracts.

#### *Tract Designation Change Data*

*The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau’s American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.*

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2021 Designations (#)	2022 Designations (#)	Net Change (#)
Low	0	0	0
Moderate	4	6	2
Middle	19	18	-1
Upper	2	3	1
Unknown	1	0	-1
Total	26	27	1
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020			

The bank maintains three branches and five ATMs; all of which are located in middle-income, census tracts. The bank has not opened or closed any branches in the assessment area since the previous evaluation.

The FDIC Deposit Market Share Report dated June 30, 2022, ranked FFBT sixth among 19 FDIC-insured institutions serving the assessment area, with 4.8 percent market share. The first ranked institution, First Mid Bank and Trust N.A. held 36.6 percent of the market share followed by Prospect Bank with 9.5 percent of the assessment area deposits.

Based on 2022 aggregate lending data, FFBT ranked 18th of 156 HMDA reporters in loan originations in the assessment area. A total of 15 originations were reported by FFBT, which was well below the leader in the market, First Mid Bank and Trust N.A. with 227 HMDA originations. Additionally in 2021, FFBT ranked fourth of 56 CRA reporters. FFBT originated 188 CRA-reportable loans (124 small business and 64 small farm loans), which was well below the leader, First Mid Bank and Trust N.A. with 801 CRA originations.

Information about census-related and business and farm demographic characteristics of the assessment area is provided in the following table.

2022 IL Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	5,729	21.1
Moderate	6	22.2	5,005	18.5	1,008	20.1	5,369	19.8
Middle	18	66.7	19,189	70.7	1,670	8.7	5,780	21.3
Upper	3	11.1	2,932	10.8	218	7.4	10,248	37.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	27	100.0	27,126	100.0	2,896	10.7	27,126	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	11,186	4,898	16.6	43.8	4,833	43.2	1,455	13.0
Middle	31,580	21,158	71.9	67.0	7,048	22.3	3,374	10.7
Upper	5,833	3,388	11.5	58.1	1,824	31.3	621	10.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	48,599	29,444	100.0	60.6	13,705	28.2	5,450	11.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	843	22.3	772	22.7	66	22.5	5	6.0
Middle	2,557	67.8	2,278	67.1	206	70.3	73	86.9
Upper	374	9.9	347	10.2	21	7.2	6	7.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,774	100.0	3,397	100.0	293	100.0	84	100.0
Percentage of Total Businesses:				90.0		7.8		2.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	18	3.9	16	3.5	2	25.0	0	0.0
Middle	436	94.4	431	94.9	5	62.5	0	0.0
Upper	8	1.7	7	1.5	1	12.5	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	462	100.0	454	100.0	8	100.0	0	0.0
Percentage of Total Farms:				98.3		1.7		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Assessment Area	Lending Test	Investment Test	Service Test
Illinois Non-MSA	Consistent	Below	Consistent

FFBT's lending performance in the Illinois Non-MSA assessment area is consistent with the institution's lending performance overall in the state of Illinois. FFBT's investment test performance in the area is below the institution's performance for the state of Illinois; however, it does not change the rating for the state.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: IL Non MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	33.3	20.3	48	37.2	19.5	16.6
Middle	2	66.7	64.3	81	62.8	62.0	71.9
Upper	0	0.0	15.4	0	0.0	18.5	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	129	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	25.0	12.9	142	22.6	10.9	16.6
Middle	6	75.0	76.5	485	77.4	75.7	71.9
Upper	0	0.0	10.6	0	0.0	13.4	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	627	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.1	0	0.0	6.7	16.6
Middle	3	100.0	75.8	150	100.0	79.1	71.9
Upper	0	0.0	13.1	0	0.0	14.2	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	150	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	100.0	41.2	149	100.0	44.5	45.5
Middle	0	0.0	35.3	0	0.0	20.3	35.8
Upper	0	0.0	23.5	0	0.0	35.2	18.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	149	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	26.7	17.9	339	32.1	18.8	16.6
Middle	11	73.3	68.5	716	67.9	63.2	71.9
Upper	0	0.0	13.5	0	0.0	18.0	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	1,055	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: IL Non MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans							
Low	2	66.7	15.0	98	76.0	8.6	21.1
Moderate	0	0.0	26.3	0	0.0	20.1	19.8
Middle	1	33.3	21.4	31	24.0	20.8	21.3
Upper	0	0.0	19.8	0	0.0	33.5	37.8
Unknown	0	0.0	17.5	0	0.0	17.0	0.0
Total	3	100.0	100.0	129	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	12.4	0	0.0	7.4	21.1
Moderate	2	25.0	21.9	142	22.6	17.0	19.8
Middle	3	37.5	23.5	228	36.4	25.2	21.3
Upper	3	37.5	28.5	257	41.0	37.0	37.8
Unknown	0	0.0	13.7	0	0.0	13.3	0.0
Total	8	100.0	100.0	627	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	9.1	0	0.0	7.5	21.1
Moderate	0	0.0	19.2	0	0.0	11.9	19.8
Middle	0	0.0	27.3	0	0.0	22.3	21.3
Upper	3	100.0	37.4	150	100.0	52.2	37.8
Unknown	0	0.0	7.1	0	0.0	6.2	0.0
Total	3	100.0	100.0	150	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	2	14.3	14.0	98	10.8	8.4	21.1
Moderate	2	14.3	24.8	142	15.7	19.3	19.8
Middle	4	28.6	21.8	259	28.6	21.6	21.3
Upper	6	42.9	23.4	407	44.9	35.0	37.8
Unknown	0	0.0	15.8	0	0.0	15.8	0.0
Total	14	100.0	100.0	906	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: IL Non MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	20.0	16.2	250	66.1	12.8	22.7
Middle	4	80.0	72.0	128	33.9	76.3	67.4
Upper	0	0.0	9.8	0	0.0	8.1	8.8
Unknown	0	0.0	1.3	0	0.0	2.5	1.2
Tract-Unk	0	0.0	0.7	0	0.0	0.2	
Total	5	100.0	100.0	378	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Farm Lending By Income Level of Geography							
Assessment Area: IL Non MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	5.9	2.1	175	6.8	1.3	5.1
Middle	16	94.1	73.9	2,382	93.2	68.0	84.4
Upper	0	0.0	23.6	0	0.0	30.6	10.5
Unknown	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.2	0	0.0	0.0	
Total	17	100.0	100.0	2,557	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: IL Non MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	4	80.0	53.2	375	99.2	40.9	89.8
Over \$1 Million	0	0.0		0	0.0		8.0
Revenue Unknown	1	20.0		3	0.8		2.3
Total	5	100.0		378	100.0		100.0
By Loan Size							
\$100,000 or Less	4	80.0	90.9	128	33.9	35.5	
\$100,001 - \$250,000	1	20.0	5.4	250	66.1	19.3	
\$250,001 - \$1 Million	0	0.0	3.7	0	0.0	45.2	
Total	5	100.0	100.0	378	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	3	75.0		125	33.3		
\$100,001 - \$250,000	1	25.0		250	66.7		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	4	100.0		375	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Farm Lending By Revenue Size of Farms							
Assessment Area: IL Non MSA							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	14	82.4	72.5	1,667	65.2	78.9	98.3
Over \$1 Million	2	11.8		865	33.8		1.7
Revenue Unknown	1	5.9		25	1.0		0.0
Total	17	100.0		2,557	100.0		100.0
By Loan Size							
\$100,000 or Less	9	52.9	76.4	396	15.5	24.8	
\$100,001 - \$250,000	5	29.4	15.2	846	33.1	34.7	
\$250,001 - \$500,000	3	17.6	8.5	1,315	51.4	40.4	
Total	17	100.0	100.0	2,557	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	8	57.1		371	22.3		
\$100,001 - \$250,000	5	35.7		846	50.7		
\$250,001 - \$500,000	1	7.1		450	27.0		
Total	14	100.0		1,667	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Community Development Loans (Dollars in 000s)									
September 21, 2021 – November 6, 2023									
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalization and Stabilization		Total
	\$	#	\$	#	\$	#	\$	#	\$ #
Illinois Non-MSA	0	0	0	0	0	0	0	0	0 0

Community Development Investments (Dollars in 000s)						
September 21, 2021 – November 6, 2023						
Assessment Area	Current Period Funded			Current Period Funded (\$)	Prior Period Funded (\$)	Total Unfunded (\$)
	Affordable Housing (\$)	Community Services (\$)	Economic Development (\$)			
Illinois Non-MSA	0	0	0	0	0	0

Community Development Grants/Donations (Dollars 000s) September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Community Services	Economic Development	Total	
	\$	\$	\$	\$	%
Illinois Non-MSA	0	0	0	0	0.0

Community Development Services September 21, 2021 – November 6, 2023					
Assessment Area	Affordable Housing	Economic Development	Community Services	Total Hours	% of Total
Illinois Non-MSA	0	0	0	0	0.0

**First Farmers Bank and Trust Co. 139843**  
Combined Assessment Area





**APPENDIX B – DEMOGRAPHIC AND LENDING CHARTS**  
Non- Indiana MSA 2021 Combined Demographics and 2021 HMDA Lending Tables

2021 IN Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	17,866	19.7
Moderate	21	23.1	17,432	19.2	3,490	20.0	17,667	19.5
Middle	63	69.2	64,421	71.1	6,081	9.4	20,770	22.9
Upper	7	7.7	8,723	9.6	574	6.6	34,273	37.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>91</b>	<b>100.0</b>	<b>90,576</b>	<b>100.0</b>	<b>10,145</b>	<b>11.2</b>	<b>90,576</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	33,963	17,396	17.6	51.2	11,275	33.2	5,292	15.6
Middle	105,903	71,665	72.5	67.7	21,205	20.0	13,033	12.3
Upper	12,647	9,847	10.0	77.9	1,685	13.3	1,115	8.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>152,513</b>	<b>98,908</b>	<b>100.0</b>	<b>64.9</b>	<b>34,165</b>	<b>22.4</b>	<b>19,440</b>	<b>12.7</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	3,056	25.8	2,716	25.5	302	32.0	38	16.7
Middle	7,636	64.6	6,908	64.8	560	59.4	168	73.7
Upper	1,132	9.6	1,029	9.7	81	8.6	22	9.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>11,824</b>	<b>100.0</b>	<b>10,653</b>	<b>100.0</b>	<b>943</b>	<b>100.0</b>	<b>228</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.1</b>		<b>8.0</b>		<b>1.9</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	16	1.2	15	1.2	0	0.0	1	50.0
Middle	1,102	83.3	1,085	83.4	16	80.0	1	50.0
Upper	205	15.5	201	15.4	4	20.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,323</b>	<b>100.0</b>	<b>1,301</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.3</b>		<b>1.5</b>		<b>0.2</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: IN Non MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	22	12.3	21.3	1,713	6.5	14.3	17.6
Middle	154	86.0	69.6	24,134	92.1	73.4	72.5
Upper	3	1.7	9.1	346	1.3	12.3	10.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	179	100.0	100.0	26,193	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	28	6.1	10.9	1,245	2.6	7.1	17.6
Middle	409	89.1	75.7	44,214	91.2	78.3	72.5
Upper	22	4.8	13.4	3,024	6.2	14.6	10.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	459	100.0	100.0	48,483	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	11.8	12.0	192	8.4	7.6	17.6
Middle	28	82.4	70.8	1,932	85.0	73.1	72.5
Upper	2	5.9	17.2	150	6.6	19.4	10.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	34	100.0	100.0	2,274	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	28.6	44.7	818	42.0	73.7	37.7
Middle	5	71.4	50.0	1,128	58.0	23.3	58.8
Upper	0	0.0	5.3	0	0.0	3.0	3.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1,946	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	56	8.2	15.7	3,968	5.0	11.7	17.6
Middle	596	87.8	72.6	71,408	90.5	74.8	72.5
Upper	27	4.0	11.6	3,520	4.5	13.4	10.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	679	100.0	100.0	78,896	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: IN Non MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	17	9.5	11.7	1,320	5.0	7.4	19.7
Moderate	48	26.8	26.6	5,056	19.3	22.1	19.5
Middle	50	27.9	21.2	7,450	28.4	23.2	22.9
Upper	52	29.1	20.8	10,246	39.1	31.8	37.8
Unknown	12	6.7	19.6	2,121	8.1	15.4	0.0
Total	179	100.0	100.0	26,193	100.0	100.0	100.0
Refinance Loans							
Low	34	7.4	8.4	2,370	4.9	4.5	19.7
Moderate	80	17.4	19.5	5,615	11.6	13.3	19.5
Middle	123	26.8	24.9	12,786	26.4	21.0	22.9
Upper	204	44.4	33.3	25,967	53.6	39.3	37.8
Unknown	18	3.9	13.8	1,745	3.6	21.9	0.0
Total	459	100.0	100.0	48,483	100.0	100.0	100.0
Home Improvement Loans							
Low	5	14.7	11.6	321	14.1	7.9	19.7
Moderate	7	20.6	21.7	340	15.0	17.0	19.5
Middle	7	20.6	24.9	358	15.7	21.4	22.9
Upper	14	41.2	38.7	955	42.0	49.1	37.8
Unknown	1	2.9	3.0	300	13.2	4.7	0.0
Total	34	100.0	100.0	2,274	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	56	8.3	9.9	4,011	5.2	5.9	19.7
Moderate	135	20.1	22.5	11,011	14.3	17.4	19.5
Middle	180	26.8	22.9	20,594	26.8	21.9	22.9
Upper	270	40.2	27.8	37,168	48.3	36.0	37.8
Unknown	31	4.6	17.0	4,166	5.4	18.8	0.0
Total	672	100.0	100.0	76,950	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Non-Indiana MSA 2022 Small Business and Small Farm Lending Tables

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: IN Non MSA					
Geographic Income Level	Bank Loans*				Total Businesses %
	#	#%	\$(000)	\$%	
Low	11	4.7	1,719	4.1	4.2
Moderate	34	14.5	5,639	13.6	20.3
Middle	137	58.3	26,640	64.1	65.2
Upper	53	22.6	7,577	18.2	10.4
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0.0
<b>Total</b>	<b>235</b>	<b>100.0</b>	<b>41,575</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: IN Non MSA					
Geographic Income Level	Bank Loans*				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.2
Moderate	5	1.2	716	1.0	4.2
Middle	270	62.8	43,259	60.9	77.4
Upper	155	36.0	27,006	38.0	18.1
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0.0
<b>Total</b>	<b>430</b>	<b>100.0</b>	<b>70,981</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: IN Non MSA					
	Bank Loans*				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	108	46.0	9,947	23.9	90.1
Over \$1 Million	93	39.6	28,942	69.6	8.0
Revenue Unknown	34	14.5	2,686	6.5	1.9
Total	235	100.0	41,575	100.0	100.0
By Loan Size					
\$100,000 or Less	149	63.4	6,981	16.8	
\$100,001 - \$250,000	38	16.2	6,565	15.8	
\$250,001 - \$1 Million	48	20.4	28,029	67.4	
Total	235	100.0	41,575	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	86	79.6	3,839	38.6	
\$100,001 - \$250,000	13	12.0	1,999	20.1	
\$250,001 - \$1 Million	9	8.3	4,109	41.3	
Total	108	100.0	9,947	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: IN Non MSA					
	Bank Loans*				Total Farms %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	322	74.9	49,627	69.9	98.4
Over \$1 Million	72	16.7	17,423	24.5	1.5
Revenue Unknown	36	8.4	3,931	5.5	0.1
Total	430	100.0	70,981	100.0	100.0
By Loan Size					
\$100,000 or Less	202	47.0	10,772	15.2	
\$100,001 - \$250,000	130	30.2	23,839	33.6	
\$250,001 - \$500,000	98	22.8	36,370	51.2	
Total	430	100.0	70,981	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	166	51.6	8,744	17.6	
\$100,001 - \$250,000	86	26.7	15,356	30.9	
\$250,001 - \$500,000	70	21.7	25,527	51.4	
Total	322	100.0	49,627	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Kokomo, IN MSA #29020 2021 Demographics and 2021 HMDA Lending Tables

2021 Kokomo, IN MSA 29020 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	10.0	1,791	8.0	602	33.6	4,955	22.2
Moderate	4	20.0	3,434	15.4	849	24.7	3,704	16.6
Middle	9	45.0	10,461	47.0	1,276	12.2	4,704	21.1
Upper	5	25.0	6,595	29.6	231	3.5	8,918	40.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	20	100.0	22,281	100.0	2,958	13.3	22,281	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,862	1,497	6.3	38.8	1,748	45.3	617	16.0
Moderate	7,327	3,372	14.2	46.0	2,460	33.6	1,495	20.4
Middle	17,841	11,558	48.7	64.8	4,830	27.1	1,453	8.1
Upper	9,619	7,304	30.8	75.9	1,644	17.1	671	7.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	38,649	23,731	100.0	61.4	10,682	27.6	4,236	11.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	310	10.9	286	10.9	23	12.4	1	3.0
Moderate	542	19.1	497	18.9	37	20.0	8	24.2
Middle	1,307	46.0	1,196	45.6	92	49.7	19	57.6
Upper	683	24.0	645	24.6	33	17.8	5	15.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,842	100.0	2,624	100.0	185	100.0	33	100.0
Percentage of Total Businesses:				92.3		6.5		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.6	2	1.6	0	0.0	0	0.0
Moderate	1	0.8	1	0.8	0	0.0	0	0.0
Middle	61	49.6	61	50.0	0	0.0	0	0.0
Upper	59	48.0	58	47.5	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	123	100.0	122	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Kokomo, IN MSA 29020							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	1	1.4	10.5	56	0.5	3.5	6.3
Moderate	6	8.6	13.4	660	5.6	9.0	14.2
Middle	37	52.9	51.7	5,305	45.2	54.2	48.7
Upper	26	37.1	24.3	5,708	48.7	33.3	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	70	100.0	100.0	11,729	100.0	100.0	100.0
Refinance Loans							
Low	1	0.4	2.2	58	0.2	0.9	6.3
Moderate	10	4.3	5.7	413	1.8	3.2	14.2
Middle	135	58.7	49.7	12,801	54.8	45.5	48.7
Upper	84	36.5	42.4	10,084	43.2	50.3	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	230	100.0	100.0	23,356	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.2	0	0.0	2.1	6.3
Moderate	0	0.0	4.9	0	0.0	4.0	14.2
Middle	5	83.3	45.1	270	88.5	39.0	48.7
Upper	1	16.7	48.8	35	11.5	54.8	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	305	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	18.8	0	0.0	4.1	
Moderate	1	50.0	18.8	1,520	65.7	12.0	8.8
Middle	1	50.0	50.0	795	34.3	80.9	63.6
Upper	0	0.0	12.5	0	0.0	3.1	13.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	2,315	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	2	0.6	6.7	114	0.3	2.4	
Moderate	17	5.5	9.4	2,593	6.9	6.5	14.2
Middle	178	57.8	50.1	19,171	50.8	51.0	48.7
Upper	111	36.0	33.8	15,827	42.0	40.1	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	308	100.0	100.0	37,705	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Kokomo, IN MSA 29020							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	12	17.1	13.1	1,170	10.0	8.4	22.2
Moderate	15	21.4	23.0	1,702	14.5	19.9	16.6
Middle	10	14.3	20.7	1,742	14.9	23.4	21.1
Upper	26	37.1	19.5	6,051	51.6	27.3	40.0
Unknown	7	10.0	23.7	1,064	9.1	21.0	0.0
Total	70	100.0	100.0	11,729	100.0	100.0	100.0
Refinance Loans							
Low	26	11.3	9.2	1,572	6.7	5.4	22.2
Moderate	41	17.8	20.3	3,096	13.3	16.1	16.6
Middle	60	26.1	25.5	6,181	26.5	24.5	21.1
Upper	85	37.0	26.2	10,374	44.4	32.2	40.0
Unknown	18	7.8	18.8	2,133	9.1	21.8	0.0
Total	230	100.0	100.0	23,356	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.9	0	0.0	4.6	22.2
Moderate	3	50.0	25.6	130	42.6	22.8	16.6
Middle	0	0.0	35.4	0	0.0	27.0	21.1
Upper	3	50.0	30.5	175	57.4	40.2	40.0
Unknown	0	0.0	3.7	0	0.0	5.4	0.0
Total	6	100.0	100.0	305	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	38	12.4	10.7	2,742	7.7	6.8	22.2
Moderate	59	19.3	21.2	4,928	13.9	17.9	16.6
Middle	70	22.9	23.5	7,923	22.4	23.9	21.1
Upper	114	37.3	23.0	16,600	46.9	29.7	40.0
Unknown	25	8.2	21.6	3,197	9.0	21.6	0.0
Total	306	100.0	100.0	35,390	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							



Kokomo, IN MSA #29020 2022 Small Business and Small Farm Lending Tables

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Kokomo, IN MSA 29020					
Geographic Income Level	Bank Loans*				Total Businesses %
	#	#%	\$(000)	\$%	
Low	2	2.3	70	0.4	8.0
Moderate	21	24.1	5,130	26.3	18.9
Middle	26	29.9	5,127	26.3	44.5
Upper	38	43.7	9,148	47.0	28.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0.0
<b>Total</b>	<b>87</b>	<b>100.0</b>	<b>19,475</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Kokomo, IN MSA 29020					
Geographic Income Level	Bank Loans*				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.8
Moderate	0	0.0	0	0.0	1.6
Middle	8	14.8	625	7.4	16.4
Upper	46	85.2	7,827	92.6	81.1
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0.0
<b>Total</b>	<b>54</b>	<b>100.0</b>	<b>8,452</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Kokomo, IN MSA 29020					
	Bank Loans*				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	28	32.2	4,845	24.9	92.4
Over \$1 Million	34	39.1	10,577	54.3	6.3
Revenue Unknown	25	28.7	4,053	20.8	1.2
Total	87	100.0	19,475	100.0	100.0
By Loan Size					
\$100,000 or Less	43	49.4	2,187	11.2	
\$100,001 - \$250,000	19	21.8	3,667	18.8	
\$250,001 - \$1 Million	25	28.7	13,621	69.9	
Total	87	100.0	19,475	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	16	57.1	847	17.5	
\$100,001 - \$250,000	8	28.6	1,315	27.1	
\$250,001 - \$1 Million	4	14.3	2,683	55.4	
Total	28	100.0	4,845	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Kokomo, IN MSA 29020					
	Bank Loans*				Total Farms %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	37	68.5	5,193	61.4	99.2
Over \$1 Million	11	20.4	2,841	33.6	0.8
Revenue Unknown	6	11.1	418	4.9	0.0
Total	54	100.0	8,452	100.0	100.0
By Loan Size					
\$100,000 or Less	30	55.6	1,437	17.0	
\$100,001 - \$250,000	12	22.2	2,110	25.0	
\$250,001 - \$500,000	12	22.2	4,905	58.0	
Total	54	100.0	8,452	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	22	59.5	943	18.2	
\$100,001 - \$250,000	8	21.6	1,360	26.2	
\$250,001 - \$500,000	7	18.9	2,890	55.7	
Total	37	100.0	5,193	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Terre Haute, IN MSA #45460 2021 Demographics and 2021 HMDA Lending Tables

2021 Terre Haute, IN MSA 45460 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	9.1	1,833	4.4	734	40.0	8,674	20.8
Moderate	9	20.5	6,812	16.3	1,703	25.0	7,336	17.6
Middle	20	45.5	19,180	45.9	2,140	11.2	8,479	20.3
Upper	11	25.0	13,931	33.4	773	5.5	17,267	41.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	44	100.0	41,756	100.0	5,350	12.8	41,756	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,718	1,163	2.7	31.3	1,969	53.0	586	15.8
Moderate	14,100	5,595	13.1	39.7	6,447	45.7	2,058	14.6
Middle	34,225	21,094	49.2	61.6	8,621	25.2	4,510	13.2
Upper	22,343	14,998	35.0	67.1	4,950	22.2	2,395	10.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	74,386	42,850	100.0	57.6	21,987	29.6	9,549	12.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	347	6.6	301	6.5	46	10.1	0	0.0
Moderate	1,086	20.8	942	20.2	120	26.3	24	22.0
Middle	2,170	41.5	1,926	41.3	193	42.2	51	46.8
Upper	1,625	31.1	1,493	32.0	98	21.4	34	31.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,228	100.0	4,662	100.0	457	100.0	109	100.0
Percentage of Total Businesses:				89.2		8.7		2.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.3	1	0.3	0	0.0	0	0.0
Moderate	3	1.0	3	1.0	0	0.0	0	0.0
Middle	169	53.7	167	53.4	2	100.0	0	0.0
Upper	142	45.1	142	45.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	315	100.0	313	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.4		0.6		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Terre Haute, IN MSA 45460							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	2.2	0	0.0	1.1	2.7
Moderate	4	11.1	16.5	423	7.1	10.9	13.1
Middle	18	50.0	48.3	2,411	40.2	44.1	49.2
Upper	14	38.9	33.0	3,166	52.8	43.9	35.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	36	100.0	100.0	6,000	100.0	100.0	100.0
Refinance Loans							
Low	1	1.3	1.0	10	0.1	0.5	2.7
Moderate	5	6.4	7.8	355	5.0	5.2	13.1
Middle	42	53.8	47.6	3,054	43.1	42.4	49.2
Upper	30	38.5	43.5	3,667	51.7	51.9	35.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	78	100.0	100.0	7,086	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.5	0	0.0	0.3	2.7
Moderate	1	7.1	6.2	70	12.2	4.1	13.1
Middle	7	50.0	48.7	260	45.5	50.2	49.2
Upper	6	42.9	44.0	242	42.3	44.9	35.0
Unknown	0	0.0	0.5	0	0.0	0.5	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	572	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	12.5	0	0.0	1.1	
Moderate	0	0.0	56.3	0	0.0	85.9	33.8
Middle	0	0.0	12.5	0	0.0	1.2	33.2
Upper	1	100.0	18.8	270	100.0	11.8	24.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	270	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	1	0.8	1.7	10	0.1	0.9	
Moderate	10	7.8	12.2	848	6.1	14.1	13.1
Middle	67	51.9	47.8	5,725	41.1	40.1	49.2
Upper	51	39.5	38.2	7,345	52.7	44.9	35.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	129	100.0	100.0	13,928	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Terre Haute, IN MSA 45460							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans							
Low	5	13.9	8.1	513	8.6	4.5	20.8
Moderate	6	16.7	22.7	722	12.0	16.8	17.6
Middle	10	27.8	21.8	1,229	20.5	21.6	20.3
Upper	12	33.3	30.3	3,057	51.0	41.5	41.4
Unknown	3	8.3	17.0	479	8.0	15.6	0.0
Total	36	100.0	100.0	6,000	100.0	100.0	100.0
Refinance Loans							
Low	4	5.1	5.3	367	5.2	2.7	20.8
Moderate	19	24.4	16.0	1,324	18.7	10.3	17.6
Middle	16	20.5	21.7	1,139	16.1	18.1	20.3
Upper	39	50.0	39.6	4,256	60.1	50.2	41.4
Unknown	0	0.0	17.3	0	0.0	18.7	0.0
Total	78	100.0	100.0	7,086	100.0	100.0	100.0
Home Improvement Loans							
Low	1	7.1	8.3	70	12.2	5.9	20.8
Moderate	0	0.0	17.6	0	0.0	13.8	17.6
Middle	3	21.4	19.2	110	19.2	16.1	20.3
Upper	10	71.4	47.2	392	68.5	52.5	41.4
Unknown	0	0.0	7.8	0	0.0	11.7	0.0
Total	14	100.0	100.0	572	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	10	7.8	6.8	950	7.0	3.7	20.8
Moderate	25	19.5	19.0	2,046	15.0	13.6	17.6
Middle	29	22.7	21.6	2,478	18.1	19.8	20.3
Upper	61	47.7	35.1	7,705	56.4	45.6	41.4
Unknown	3	2.3	17.4	479	3.5	17.3	0.0
Total	128	100.0	100.0	13,658	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Terre Haute, IN MSA #45460 2022 Small Business and Small Farm Lending Tables

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Terre Haute, IN MSA 45460					
Geographic Income Level	Bank Loans*				Total Businesses %
	#	#%	\$(000)	\$%	
Low	6	14.0	1,893	14.6	6.0
Moderate	5	11.6	1,875	14.5	18.7
Middle	22	51.2	4,415	34.1	45.0
Upper	10	23.3	4,752	36.7	24.1
Unknown	0	0.0	0	0.0	6.1
Tract-Unk	0	0.0	0	0.0	0.0
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>12,935</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Terre Haute, IN MSA 45460					
Geographic Income Level	Bank Loans*				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.3
Moderate	5	9.8	904	15.0	10.2
Middle	36	70.6	3,576	59.5	55.1
Upper	10	19.6	1,534	25.5	34.4
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0.0
<b>Total</b>	<b>51</b>	<b>100.0</b>	<b>6,014</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Terre Haute, IN MSA 45460					
	Bank Loans*				Total
	#	#%	\$(000)	\$%	Businesses %
By Revenue					
\$1 Million or Less	12	27.9	1,457	11.3	89.2
Over \$1 Million	26	60.5	11,158	86.3	8.7
Revenue Unknown	5	11.6	320	2.5	2.1
Total	43	100.0	12,935	100.0	100.0
By Loan Size					
\$100,000 or Less	17	39.5	702	5.4	
\$100,001 - \$250,000	8	18.6	1,223	9.5	
\$250,001 - \$1 Million	18	41.9	11,010	85.1	
Total	43	100.0	12,935	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	10	83.3	342	23.5	
\$100,001 - \$250,000	1	8.3	125	8.6	
\$250,001 - \$1 Million	1	8.3	990	67.9	
Total	12	100.0	1,457	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Terre Haute, IN MSA 45460					
	Bank Loans*				Total Farms %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	44	86.3	4,829	80.3	99.4
Over \$1 Million	6	11.8	1,095	18.2	0.6
Revenue Unknown	1	2.0	90	1.5	0.0
Total	51	100.0	6,014	100.0	100.0
By Loan Size					
\$100,000 or Less	29	56.9	1,483	24.7	
\$100,001 - \$250,000	16	31.4	2,501	41.6	
\$250,001 - \$500,000	6	11.8	2,030	33.8	
Total	51	100.0	6,014	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	25	56.8	1,181	24.5	
\$100,001 - \$250,000	15	34.1	2,368	49.0	
\$250,001 - \$500,000	4	9.1	1,280	26.5	
Total	44	100.0	4,829	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					



Indianapolis-Carmel-Anderson, IN MSA #26900 2021 Demographics and HMDA Lending  
Tables

2021 Indianapolis-Carmel-Anderson, IN MSA 26900 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	6	7.0	2,588	2.0	867	33.5	17,817	13.7
Moderate	14	16.3	13,915	10.7	2,549	18.3	19,191	14.7
Middle	31	36.0	38,336	29.4	2,424	6.3	23,742	18.2
Upper	34	39.5	75,602	58.0	1,851	2.4	69,691	53.4
Unknown	1	1.2	0	0.0	0	0.0	0	0.0
Total AA	86	100.0	130,441	100.0	7,691	5.9	130,441	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	7,125	2,140	1.6	30.0	3,011	42.3	1,974	27.7
Moderate	26,368	13,189	9.6	50.0	9,454	35.9	3,725	14.1
Middle	58,272	41,823	30.4	71.8	12,036	20.7	4,413	7.6
Upper	105,394	80,462	58.5	76.3	20,327	19.3	4,605	4.4
Unknown	9	0	0.0	0.0	9	100.0	0	0.0
Total AA	197,168	137,614	100.0	69.8	44,837	22.7	14,717	7.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	650	2.5	582	2.4	63	3.5	5	1.8
Moderate	2,474	9.6	2,263	9.5	186	10.3	25	8.9
Middle	5,397	20.9	4,964	20.9	347	19.2	86	30.6
Upper	17,338	67.0	15,964	67.1	1,210	66.9	164	58.4
Unknown	11	0.0	6	0.0	4	0.2	1	0.4
Total AA	25,870	100.0	23,779	100.0	1,810	100.0	281	100.0
Percentage of Total Businesses:				91.9		7.0		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	12	2.2	12	2.2	0	0.0	0	0.0
Middle	393	70.4	387	70.2	6	85.7	0	0.0
Upper	153	27.4	152	27.6	1	14.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	558	100.0	551	100.0	7	100.0	0	0.0
Percentage of Total Farms:				98.7		1.3		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.6	0	0.0	0.2	1.6
Moderate	0	0.0	7.4	0	0.0	3.1	9.6
Middle	14	50.0	26.1	4,368	47.4	20.1	30.4
Upper	14	50.0	65.5	4,842	52.6	76.2	58.5
Unknown	0	0.0	0.4	0	0.0	0.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	28	100.0	100.0	9,210	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.2	0	0.0	0.1	1.6
Moderate	14	14.7	4.0	772	5.2	1.8	9.6
Middle	46	48.4	23.0	7,226	48.3	17.8	30.4
Upper	35	36.8	72.8	6,950	46.5	80.4	58.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	95	100.0	100.0	14,948	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.3	0	0.0	0.1	1.6
Moderate	3	75.0	4.3	99	53.8	2.5	9.6
Middle	1	25.0	23.0	85	46.2	19.7	30.4
Upper	0	0.0	72.4	0	0.0	77.6	58.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	184	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	9.1	0	0.0	0.3	
Moderate	0	0.0	25.5	0	0.0	19.8	10.3
Middle	1	100.0	25.5	5,600	100.0	5.8	20.5
Upper	0	0.0	40.0	0	0.0	74.1	65.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	5,600	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.4	0	0.0	0.1	
Moderate	17	13.3	5.3	871	2.9	3.2	9.6
Middle	62	48.4	24.2	17,279	57.7	18.2	30.4
Upper	49	38.3	69.9	11,792	39.4	78.3	58.5
Unknown	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	128	100.0	100.0	29,942	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	3	10.7	5.2	342	3.7	2.1	13.7
Moderate	4	14.3	15.4	735	8.0	9.7	14.7
Middle	4	14.3	19.6	1,010	11.0	16.4	18.2
Upper	17	60.7	44.0	7,123	77.3	57.2	53.4
Unknown	0	0.0	15.8	0	0.0	14.7	0.0
Total	28	100.0	100.0	9,210	100.0	100.0	100.0
Refinance Loans							
Low	6	6.3	4.9	428	2.9	2.2	13.7
Moderate	21	22.1	12.5	2,014	13.5	7.6	14.7
Middle	24	25.3	18.7	3,144	21.0	14.8	18.2
Upper	41	43.2	47.9	9,063	60.6	59.0	53.4
Unknown	3	3.2	16.0	299	2.0	16.4	0.0
Total	95	100.0	100.0	14,948	100.0	100.0	100.0
Home Improvement Loans							
Low	2	50.0	4.2	79	42.9	2.5	13.7
Moderate	2	50.0	10.0	105	57.1	6.9	14.7
Middle	0	0.0	17.8	0	0.0	13.9	18.2
Upper	0	0.0	66.2	0	0.0	75.2	53.4
Unknown	0	0.0	1.7	0	0.0	1.4	0.0
Total	4	100.0	100.0	184	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	11	8.7	5.0	849	3.5	2.2	13.7
Moderate	27	21.3	13.3	2,854	11.7	8.5	14.7
Middle	28	22.0	18.8	4,154	17.1	15.4	18.2
Upper	58	45.7	47.5	16,186	66.5	58.7	53.4
Unknown	3	2.4	15.3	299	1.2	15.3	0.0
Total	127	100.0	100.0	24,342	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Indianapolis-Carmel-Anderson, IN MSA #26900 2022 Small Business and Small Farm  
Lending Tables

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900					
Geographic Income Level	Bank Loans*				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	1.7
Moderate	4	10.0	123	1.2	7.0
Middle	30	75.0	8,074	79.6	37.7
Upper	6	15.0	1,942	19.2	53.6
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0.0
Total	40	100.0	10,139	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900					
Geographic Income Level	Bank Loans*				Total Farms %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	4	8.3	649	6.6	6.2
Middle	39	81.3	7,331	75.1	66.4
Upper	5	10.4	1,785	18.3	27.5
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0.0
Total	48	100.0	9,765	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900					
	Bank Loans*				Total Businesses %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	17	42.5	2,892	28.5	91.8
Over \$1 Million	12	30.0	5,366	52.9	7.0
Revenue Unknown	11	27.5	1,881	18.6	1.2
Total	40	100.0	10,139	100.0	100.0
By Loan Size					
\$100,000 or Less	19	47.5	972	9.6	
\$100,001 - \$250,000	7	17.5	1,361	13.4	
\$250,001 - \$1 Million	14	35.0	7,806	77.0	
Total	40	100.0	10,139	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	11	64.7	516	17.8	
\$100,001 - \$250,000	2	11.8	400	13.8	
\$250,001 - \$1 Million	4	23.5	1,976	68.3	
Total	17	100.0	2,892	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Indianapolis-Carmel-Anderson, IN MSA 26900					
	Bank Loans*				Total Farms %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	38	79.2	7,174	73.5	98.7
Over \$1 Million	10	20.8	2,591	26.5	1.3
Revenue Unknown	0	0.0	0	0.0	0.0
Total	48	100.0	9,765	100.0	100.0
By Loan Size					
\$100,000 or Less	16	33.3	768	7.9	
\$100,001 - \$250,000	17	35.4	3,372	34.5	
\$250,001 - \$500,000	15	31.3	5,625	57.6	
Total	48	100.0	9,765	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	13	34.2	600	8.4	
\$100,001 - \$250,000	14	36.8	2,662	37.1	
\$250,001 - \$500,000	11	28.9	3,912	54.5	
Total	38	100.0	7,174	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Lafayette-West Lafayette, IN MSA #29200 2021 Demographics and HMDA Lending Tables

2021 Lafayette-West Lafayette, IN MSA 29200 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	6.8	1,168	2.7	506	43.3	8,835	20.5
Moderate	10	22.7	8,247	19.1	1,494	18.1	6,985	16.2
Middle	16	36.4	17,419	40.3	1,825	10.5	9,919	23.0
Upper	12	27.3	16,237	37.6	838	5.2	17,441	40.4
Unknown	3	6.8	109	0.3	22	20.2	0	0.0
Total AA	44	100.0	43,180	100.0	4,685	10.8	43,180	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,131	410	1.0	8.0	4,068	79.3	653	12.7
Moderate	17,789	6,662	15.8	37.5	9,534	53.6	1,593	9.0
Middle	30,780	17,130	40.7	55.7	10,834	35.2	2,816	9.1
Upper	26,506	17,796	42.3	67.1	7,082	26.7	1,628	6.1
Unknown	2,386	43	0.1	1.8	1,990	83.4	353	14.8
Total AA	82,592	42,041	100.0	50.9	33,508	40.6	7,043	8.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	269	4.0	244	3.9	24	5.3	1	1.7
Moderate	1,928	28.8	1,715	27.7	198	43.5	15	25.0
Middle	2,169	32.4	2,016	32.6	129	28.4	24	40.0
Upper	2,104	31.4	1,991	32.2	93	20.4	20	33.3
Unknown	231	3.4	220	3.6	11	2.4	0	0.0
Total AA	6,701	100.0	6,186	100.0	455	100.0	60	100.0
Percentage of Total Businesses:				92.3		6.8		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.2	1	0.3	0	0.0	0	0.0
Moderate	12	2.9	11	2.8	1	9.1	0	0.0
Middle	250	61.3	242	61.0	8	72.7	0	0.0
Upper	145	35.5	143	36.0	2	18.2	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	408	100.0	397	100.0	11	100.0	0	0.0
Percentage of Total Farms:				97.3		2.7		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Lafayette-West Lafayette, IN MSA 29200							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	2	12.5	1.3	209	6.7	0.8	1.0
Moderate	1	6.3	17.7	204	6.6	12.1	15.8
Middle	8	50.0	38.4	1,258	40.6	35.6	40.7
Upper	5	31.3	42.4	1,428	46.1	51.4	42.3
Unknown	0	0.0	0.2	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	3,099	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.3	0	0.0	0.2	1.0
Moderate	0	0.0	11.6	0	0.0	7.5	15.8
Middle	29	76.3	38.4	4,137	74.9	35.5	40.7
Upper	9	23.7	49.6	1,389	25.1	56.9	42.3
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	5,526	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.7	0	0.0	0.4	1.0
Moderate	0	0.0	11.4	0	0.0	8.1	15.8
Middle	1	100.0	36.1	35	100.0	32.2	40.7
Upper	0	0.0	51.7	0	0.0	59.2	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	35	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	21.7	0	0.0	14.8	17.2
Moderate	0	0.0	38.3	0	0.0	41.9	27.3
Middle	0	0.0	23.3	0	0.0	31.7	26.7
Upper	1	100.0	10.0	3,000	100.0	7.0	19.1
Unknown	0	0.0	6.7	0	0.0	4.6	9.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	3,000	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	2	3.6	0.9	209	1.8	1.5	1.0
Moderate	1	1.8	14.2	204	1.7	12.0	15.8
Middle	38	67.9	38.1	5,430	46.6	35.1	40.7
Upper	15	26.8	46.7	5,817	49.9	50.9	42.3
Unknown	0	0.0	0.1	0	0.0	0.4	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	56	100.0	100.0	11,660	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Lafayette-West Lafayette, IN MSA 29200							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	2	12.5	10.1	260	8.4	6.3	20.5
Moderate	3	18.8	21.9	633	20.4	17.5	16.2
Middle	2	12.5	21.2	405	13.1	21.1	23.0
Upper	5	31.3	32.6	1,357	43.8	41.8	40.4
Unknown	4	25.0	14.2	444	14.3	13.4	0.0
Total	16	100.0	100.0	3,099	100.0	100.0	100.0
Refinance Loans							
Low	2	5.3	7.8	178	3.2	4.5	20.5
Moderate	6	15.8	19.0	768	13.9	14.4	16.2
Middle	8	21.1	22.7	1,017	18.4	20.5	23.0
Upper	16	42.1	33.8	3,059	55.4	43.2	40.4
Unknown	6	15.8	16.6	504	9.1	17.3	0.0
Total	38	100.0	100.0	5,526	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.4	0	0.0	4.6	20.5
Moderate	0	0.0	14.5	0	0.0	13.3	16.2
Middle	0	0.0	25.3	0	0.0	21.8	23.0
Upper	1	100.0	49.5	35	100.0	56.1	40.4
Unknown	0	0.0	4.2	0	0.0	4.2	0.0
Total	1	100.0	100.0	35	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	4	7.3	8.5	438	5.1	5.3	20.5
Moderate	9	16.4	19.7	1,401	16.2	15.7	16.2
Middle	10	18.2	22.2	1,422	16.4	20.7	23.0
Upper	22	40.0	34.4	4,451	51.4	43.0	40.4
Unknown	10	18.2	15.2	948	10.9	15.3	0.0
Total	55	100.0	100.0	8,660	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							



Lafayette-West Lafayette, IN MSA #29200 2022 Small Business and Small Farm Lending  
Tables

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Lafayette-West Lafayette, IN MSA 29200					
Geographic Income Level	Bank Loans*				Total Businesses %
	#	#%	\$(000)	\$%	
Low	2	5.1	650	9.6	8.6
Moderate	4	10.3	856	12.6	24.4
Middle	31	79.5	5,061	74.5	39.9
Upper	2	5.1	223	3.3	24.0
Unknown	0	0.0	0	0.0	3.1
Tract-Unk	0	0.0	0	0.0	0.0
Total	39	100.0	6,790	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Lafayette-West Lafayette, IN MSA 29200					
Geographic Income Level	Bank Loans*				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.5
Moderate	0	0.0	0	0.0	2.2
Middle	33	89.2	6,090	84.5	73.0
Upper	4	10.8	1,118	15.5	24.3
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0.0
Total	37	100.0	7,208	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Lafayette-West Lafayette, IN MSA 29200					
	Bank Loans*				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	17	43.6	1,439	21.2	92.5
Over \$1 Million	17	43.6	4,215	62.1	6.6
Revenue Unknown	5	12.8	1,136	16.7	0.9
Total	39	100.0	6,790	100.0	100.0
By Loan Size					
\$100,000 or Less	20	51.3	734	10.8	
\$100,001 - \$250,000	6	15.4	1,068	15.7	
\$250,001 - \$1 Million	13	33.3	4,988	73.5	
Total	39	100.0	6,790	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	12	70.6	361	25.1	
\$100,001 - \$250,000	4	23.5	698	48.5	
\$250,001 - \$1 Million	1	5.9	380	26.4	
Total	17	100.0	1,439	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Lafayette-West Lafayette, IN MSA 29200					
	Bank Loans*				Total Farms %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	29	78.4	4,966	68.9	97.3
Over \$1 Million	6	16.2	1,752	24.3	2.7
Revenue Unknown	2	5.4	490	6.8	0.0
Total	37	100.0	7,208	100.0	100.0
By Loan Size					
\$100,000 or Less	11	29.7	606	8.4	
\$100,001 - \$250,000	16	43.2	2,861	39.7	
\$250,001 - \$500,000	10	27.0	3,741	51.9	
Total	37	100.0	7,208	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	9	31.0	468	9.4	
\$100,001 - \$250,000	14	48.3	2,543	51.2	
\$250,001 - \$500,000	6	20.7	1,955	39.4	
Total	29	100.0	4,966	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Danville, IL MSA #19180 2021 Demographics and HMDA Lending Tables

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2021 Danville, IL MSA 19180 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	4.2	851	4.2	376	44.2	4,388	21.7
Moderate	5	20.8	3,018	14.9	892	29.6	3,388	16.8
Middle	10	41.7	9,603	47.6	1,162	12.1	4,181	20.7
Upper	8	33.3	6,716	33.3	437	6.5	8,231	40.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	24	100.0	20,188	100.0	2,867	14.2	20,188	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,482	611	2.8	41.2	688	46.4	183	12.3
Moderate	6,185	2,470	11.4	39.9	2,411	39.0	1,304	21.1
Middle	17,179	10,798	49.6	62.9	4,554	26.5	1,827	10.6
Upper	11,247	7,872	36.2	70.0	2,127	18.9	1,248	11.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	36,093	21,751	100.0	60.3	9,780	27.1	4,562	12.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	66	3.0	44	2.3	21	10.3	1	2.0
Moderate	524	24.1	447	23.2	72	35.5	5	9.8
Middle	967	44.4	871	45.3	72	35.5	24	47.1
Upper	621	28.5	562	29.2	38	18.7	21	41.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,178	100.0	1,924	100.0	203	100.0	51	100.0
Percentage of Total Businesses:				88.3		9.3		2.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	80	43.5	77	43.3	3	60.0	0	0.0
Upper	104	56.5	101	56.7	2	40.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	184	100.0	178	100.0	5	100.0	1	100.0
Percentage of Total Farms:				96.7		2.7		0.5
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Danville, IL MSA 19180							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	1.3	0	0.0	0.7	2.8
Moderate	0	0.0	3.0	0	0.0	2.4	11.4
Middle	17	100.0	51.3	1,242	100.0	46.2	49.6
Upper	0	0.0	44.4	0	0.0	50.8	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	1,242	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.4	0	0.0	0.1	2.8
Moderate	0	0.0	2.7	0	0.0	1.8	11.4
Middle	21	87.5	46.6	1,181	84.3	42.8	49.6
Upper	3	12.5	50.3	220	15.7	55.2	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	1,401	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	5.0	0	0.0	3.7	2.8
Moderate	1	20.0	15.0	40	26.7	9.2	11.4
Middle	4	80.0	50.0	110	73.3	56.1	49.6
Upper	0	0.0	30.0	0	0.0	31.0	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	150	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	6.1	0	0.0	10.5	12.2
Moderate	0	0.0	45.5	0	0.0	27.2	21.1
Middle	1	100.0	36.4	356	100.0	48.7	37.8
Upper	0	0.0	12.1	0	0.0	13.6	29.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	356	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.1	0	0.0	0.9	2.8
Moderate	1	2.1	4.1	40	1.3	3.4	11.4
Middle	43	91.5	49.3	2,889	91.7	45.2	49.6
Upper	3	6.4	45.4	220	7.0	50.5	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	47	100.0	100.0	3,149	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Danville, IL MSA 19180							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	4	23.5	7.6	205	16.5	4.4	21.7
Moderate	2	11.8	23.7	127	10.2	18.2	16.8
Middle	2	11.8	24.5	214	17.2	23.7	20.7
Upper	8	47.1	27.8	577	46.5	37.9	40.8
Unknown	1	5.9	16.4	119	9.6	15.8	0.0
Total	17	100.0	100.0	1,242	100.0	100.0	100.0
Refinance Loans							
Low	2	8.3	3.9	59	4.2	1.8	21.7
Moderate	6	25.0	14.2	191	13.6	8.8	16.8
Middle	4	16.7	24.9	137	9.8	22.5	20.7
Upper	10	41.7	42.4	957	68.3	49.1	40.8
Unknown	2	8.3	14.6	57	4.1	17.9	0.0
Total	24	100.0	100.0	1,401	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	7.5	0	0.0	10.0	21.7
Moderate	3	60.0	32.5	70	46.7	26.3	16.8
Middle	0	0.0	20.0	0	0.0	17.7	20.7
Upper	1	20.0	32.5	25	16.7	33.1	40.8
Unknown	1	20.0	7.5	55	36.7	12.9	0.0
Total	5	100.0	100.0	150	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	6	13.0	6.0	264	9.5	3.3	21.7
Moderate	11	23.9	19.4	388	13.9	13.9	16.8
Middle	6	13.0	24.0	351	12.6	22.8	20.7
Upper	19	41.3	34.1	1,559	55.8	42.6	40.8
Unknown	4	8.7	16.5	231	8.3	17.4	0.0
Total	46	100.0	100.0	2,793	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Danville, IL MSA #19180 2022 Small Business and Small Farm Lending Tables

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Danville, IL MSA 19180					
Geographic Income Level	Bank Loans*				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	14.7
Moderate	0	0.0	0	0.0	9.8
Middle	22	66.7	1,904	69.1	49.5
Upper	10	30.3	750	27.2	23.6
Unknown	1	3.0	100	3.6	2.4
Tract-Unk	0	0.0	0	0.0	0.0
<b>Total</b>	<b>33</b>	<b>100.0</b>	<b>2,754</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Danville, IL MSA 19180					
Geographic Income Level	Bank Loans*				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	10	52.6	1,628	70.7	46.7
Upper	9	47.4	675	29.3	53.3
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0.0
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>2,303</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Danville, IL MSA 19180					
	Bank Loans*				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	18	54.5	818	29.7	88.3
Over \$1 Million	7	21.2	1,656	60.1	9.3
Revenue Unknown	8	24.2	280	10.2	2.4
Total	33	100.0	2,754	100.0	100.0
By Loan Size					
\$100,000 or Less	25	75.8	764	27.7	
\$100,001 - \$250,000	6	18.2	890	32.3	
\$250,001 - \$1 Million	2	6.1	1,100	39.9	
Total	33	100.0	2,754	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	15	83.3	363	44.4	
\$100,001 - \$250,000	3	16.7	455	55.6	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	18	100.0	818	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Danville, IL MSA 19180					
	Bank Loans*				Total Farms %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	14	73.7	1,427	62.0	97.2
Over \$1 Million	4	21.1	726	31.5	2.2
Revenue Unknown	1	5.3	150	6.5	0.6
Total	19	100.0	2,303	100.0	100.0
By Loan Size					
\$100,000 or Less	12	63.2	796	34.6	
\$100,001 - \$250,000	6	31.6	1,080	46.9	
\$250,001 - \$500,000	1	5.3	427	18.5	
Total	19	100.0	2,303	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	10	71.4	647	45.3	
\$100,001 - \$250,000	4	28.6	780	54.7	
\$250,001 - \$500,000	0	0.0	0	0.0	
Total	14	100.0	1,427	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Illinois Non-MSA 2021 Combined Demographics and 2021 HMDA Lending Tables

2021 IL Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	6,198	22.5
Moderate	4	15.4	5,017	18.2	893	17.8	4,964	18.0
Middle	19	73.1	19,303	70.0	2,156	11.2	5,878	21.3
Upper	2	7.7	3,041	11.0	186	6.1	10,525	38.2
Unknown	1	3.8	204	0.7	76	37.3	0	0.0
Total AA	26	100.0	27,565	100.0	3,311	12.0	27,565	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	9,411	4,804	16.3	51.0	3,368	35.8	1,239	13.2
Middle	33,098	21,034	71.4	63.6	8,515	25.7	3,549	10.7
Upper	4,746	3,502	11.9	73.8	958	20.2	286	6.0
Unknown	1,098	126	0.4	11.5	737	67.1	235	21.4
Total AA	48,353	29,466	100.0	60.9	13,578	28.1	5,309	11.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	872	22.7	781	22.6	81	26.5	10	11.5
Middle	2,592	67.4	2,316	67.1	204	66.7	72	82.8
Upper	337	8.8	313	9.1	19	6.2	5	5.7
Unknown	46	1.2	44	1.3	2	0.7	0	0.0
Total AA	3,847	100.0	3,454	100.0	306	100.0	87	100.0
Percentage of Total Businesses:				89.8		8.0		2.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	24	5.1	22	4.7	2	25.0	0	0.0
Middle	400	84.4	394	84.5	6	75.0	0	0.0
Upper	50	10.5	50	10.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	474	100.0	466	100.0	8	100.0	0	0.0
Percentage of Total Farms:				98.3		1.7		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: IL Non MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	46.2	24.6	414	39.8	15.7	16.3
Middle	6	46.2	67.1	487	46.9	71.3	71.4
Upper	1	7.7	7.2	138	13.3	11.9	11.9
Unknown	0	0.0	1.1	0	0.0	1.1	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	1,039	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	10	41.7	16.4	652	40.8	13.9	16.3
Middle	14	58.3	70.4	947	59.2	68.3	71.4
Upper	0	0.0	12.3	0	0.0	17.0	11.9
Unknown	0	0.0	0.8	0	0.0	0.8	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	1,599	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	50.0	17.1	20	36.4	14.3	16.3
Middle	1	50.0	73.2	35	63.6	68.5	71.4
Upper	0	0.0	9.8	0	0.0	17.2	11.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	55	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	7.1	0	0.0	2.0	27.2
Middle	0	0.0	85.7	0	0.0	56.1	50.9
Upper	0	0.0	0.0	0	0.0	0.0	7.3
Unknown	0	0.0	7.1	0	0.0	41.9	14.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	17	43.6	21.5	1,086	40.3	14.1	16.3
Middle	21	53.8	68.2	1,469	54.5	69.1	71.4
Upper	1	2.6	9.3	138	5.1	13.3	11.9
Unknown	0	0.0	1.0	0	0.0	3.5	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	39	100.0	100.0	2,693	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: IL Non MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	3	23.1	11.0	155	14.9	7.1	22.5
Moderate	3	23.1	26.0	243	23.4	22.3	18.0
Middle	5	38.5	20.5	444	42.7	23.4	21.3
Upper	1	7.7	19.8	147	14.1	31.0	38.2
Unknown	1	7.7	22.6	50	4.8	16.2	0.0
Total	13	100.0	100.0	1,039	100.0	100.0	100.0
Refinance Loans							
Low	4	16.7	6.3	143	8.9	3.1	22.5
Moderate	4	16.7	17.7	348	21.8	13.0	18.0
Middle	5	20.8	22.1	437	27.3	18.7	21.3
Upper	11	45.8	39.6	671	42.0	49.2	38.2
Unknown	0	0.0	14.3	0	0.0	15.9	0.0
Total	24	100.0	100.0	1,599	100.0	100.0	100.0
Home Improvement Loans							
Low	1	50.0	24.4	20	36.4	16.7	22.5
Moderate	0	0.0	14.6	0	0.0	10.5	18.0
Middle	0	0.0	14.6	0	0.0	17.9	21.3
Upper	1	50.0	26.8	35	63.6	35.5	38.2
Unknown	0	0.0	19.5	0	0.0	19.5	0.0
Total	2	100.0	100.0	55	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	8	20.5	9.2	318	11.8	5.5	22.5
Moderate	7	17.9	21.8	591	21.9	18.0	18.0
Middle	10	25.6	20.7	881	32.7	21.1	21.3
Upper	13	33.3	28.0	853	31.7	39.0	38.2
Unknown	1	2.6	20.3	50	1.9	16.5	0.0
Total	39	100.0	100.0	2,693	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Illinois Non-MSA 2022 Small Business and Small Farm Lending Tables

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: IL Non MSA					
Geographic Income Level	Bank Loans*				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	1	3.3	25	0.8	22.3
Middle	29	96.7	3,201	99.2	67.8
Upper	0	0.0	0	0.0	9.9
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0.0
<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>3,226</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: IL Non MSA					
Geographic Income Level	Bank Loans*				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	3.9
Middle	82	100.0	10,440	100.0	94.4
Upper	0	0.0	0	0.0	1.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0.0
<b>Total</b>	<b>82</b>	<b>100.0</b>	<b>10,440</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: IL Non MSA					
	Bank Loans*				Total Businesses %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	20	66.7	1,574	48.8	90.0
Over \$1 Million	5	16.7	1,342	41.6	7.8
Revenue Unknown	5	16.7	310	9.6	2.2
Total	30	100.0	3,226	100.0	100.0
By Loan Size					
\$100,000 or Less	23	76.7	1,181	36.6	
\$100,001 - \$250,000	6	20.0	1,045	32.4	
\$250,001 - \$1 Million	1	3.3	1,000	31.0	
Total	30	100.0	3,226	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	15	75.0	684	43.5	
\$100,001 - \$250,000	5	25.0	890	56.5	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	20	100.0	1,574	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: IL Non MSA					
	Bank Loans*				Total Farms %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	59	72.0	6,312	60.5	98.3
Over \$1 Million	21	25.6	4,116	39.4	1.7
Revenue Unknown	2	2.4	12	0.1	0.0
Total	82	100.0	10,440	100.0	100.0
By Loan Size					
\$100,000 or Less	50	61.0	2,599	24.9	
\$100,001 - \$250,000	21	25.6	3,643	34.9	
\$250,001 - \$500,000	11	13.4	4,198	40.2	
Total	82	100.0	10,440	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	39	66.1	2,046	32.4	
\$100,001 - \$250,000	15	25.4	2,512	39.8	
\$250,001 - \$500,000	5	8.5	1,754	27.8	
Total	59	100.0	6,312	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

## APPENDIX C – SCOPE OF EXAMINATION

SCOPE OF EXAMINATION			
<b>TIME PERIOD REVIEWED</b>	HMDA- and CRA-Reportable Lending was evaluated from January 1, 2021, through December 31, 2022. Community development activities were evaluated from September 21, 2021, through November 6, 2023.		
<b>FINANCIAL INSTITUTION</b> First Farmers Bank and Trust		<b>PRODUCTS REVIEWED</b> HMDA-Reportable Loans CRA-Reportable Small business and Small Farm Loans Community Development Loans Community Development Investments Community Development Services	
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>	<b>PRODUCTS REVIEWED</b>	
None	N/A	N/A	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Non-MSA Indiana	Full Scope Review	None	None
Kokomo, IN MSA #29020	Full Scope Review	None	None

Terre Haute, IN MSA #45460	Full Scope Review	None	None
Danville, IL MSA #19180	Full Scope Review	None	None
Indianapolis-Carmel-Anderson, IN MSA #26900	Limited Scope Review	None	None
Lafayette- West Lafayette, IN MSA#29200	Limited Scope Review	None	None
Illinois Non-MSA	Limited Scope Review	None	None

## APPENDIX D – Glossary

**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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Affordability ratio:** To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

**Aggregate lending:** The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

**American Community Survey Data (ACS):** The American Community Survey (ACS) data is based on a nationwide survey designed to provide local communities with reliable and timely demographic, social, economic, and housing data each year. The Census Bureau first released data for geographies of all sizes in 2010. This data is known as the “five-year estimate data.” The five-year estimate data is used by the FFIEC as the base file for data used in conjunction with consumer compliance and CRA examinations.<sup>4</sup>

**Area Median Income (AMI):** AMI means –

1. The median family income for the MSA, if a person or geography is located in an MSA, or for the metropolitan division, if a person or geography is located in an MSA that has been subdivided into metropolitan divisions; or
2. The statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment area:** Assessment area means a geographic area delineated in accordance with section 228.41

**Automated teller machine (ATM):** An automated teller machine means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank at which deposits are received, cash dispersed or money lent.

**Bank:** Bank means a state member as that term is defined in section 3(d)(2) of the Federal Deposit Insurance Act (12 USC 1813(d)(2)), except as provided in section 228.11(c)(3), and includes an

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<sup>4</sup> Source: FFIEC press release dated October 19, 2011.

uninsured state branch (other than a limited branch) of a foreign bank described in section 228.11(c)(2).

**Branch:** Branch refers to a staffed banking facility approved as a branch, whether shared or unshared, including, for example, a mini-branch in a grocery store or a branch operated in conjunction with any other local business or nonprofit organization.

**Census tract:** Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. They usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Combined Statistical Area (CSAs):** Adjacent metropolitan statistical areas/metropolitan divisions (MSA/MDs) and micropolitan statistical areas may be combined into larger Combined Statistical Areas based on social and economic ties as well as commuting patterns. The ties used as the basis for CSAs are not as strong as the ties used to support MSA/MD and micropolitan statistical area designations; however, they do bind the larger area together and may be particularly useful for regional planning authorities and the private sector. Under Regulation BB, assessment areas may be presented under a Combined Statistical Area heading; however, all analysis is conducted on the basis of median income figures for MSA/MDs and the applicable state-wide non metropolitan median income figure.

**Community Development:** The financial supervisory agencies have adopted the following definition for community development:

1. Affordable housing, including for multi-family housing, for low- and moderate-income households;
2. Community services tailored to meet the needs of low- and moderate-income individuals;
3. Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or
4. Activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definitions of community development. Activities that revitalize or stabilize:

- 1) Low- or moderate-income geographies;
- 2) Designated disaster areas; or
- 3) Distressed or underserved nonmetropolitan middle-income geographies



designated by the Board, Federal Deposit Insurance Corporation and Office of the Comptroller of the Currency based on:

- a. Rates of poverty, unemployment or population loss; or
- b. Population size, density and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density and dispersion if they help to meet essential community services including the needs of low- and moderate-income individuals.

**Community Development Loan:** A community development loan means a loan that:

- 1) Has as its primary purpose community development; and
- 2) Except in the case of a wholesale or limited purpose bank –
  - a. Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment as a home mortgage, small business, small farm, or consumer loan, unless it is a multi-family housing loan (as described in the regulation implementing the Home Mortgage Disclosure Act); and
  - b. Benefits the bank's assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s).

**Community Development Service:** A community development service means a service that:

- 1) Has as its primary purpose community development; and
- 2) Is related to the provision of financial services.

**Consumer loan:** 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 of loans: motor vehicle, credit card, other consumer secured loan, includes loans for home improvement purposes not secured by a dwelling, and other consumer unsecured loan, includes loans for home improvement purposes not secured.

**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 household and no wife present) or "female householder" (a family with a female householder and no husband present).

**Fair market rent:** Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to

permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

**Full review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and amount of qualified investments) and qualitative factors (for example, innovativeness, complexity and responsiveness).

**Geography:** A census tract delineated by the U.S. Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act:** The statute that requires certain mortgage lenders that do business or have banking offices in metropolitan statistical areas to file annual summary reports of their mortgage lending activity. The reports include data such as the race, gender and income of the applicant(s) and the disposition of the application(s) (for example, approved, denied, and withdrawn).

**Home mortgage loans:** Are defined in conformance with the definitions of home mortgage activity under the Home Mortgage Disclosure Act and include closed end mortgage loans secured by a dwelling and open-end lines of credit secured by a dwelling. This includes loans for home purchase, refinancing and loans for multi-family housing. It does not include loans for home improvement purposes that are not secured by a dwelling.

**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.

**Income Level:** Income level means:

- 1) Low-income – an individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a census tract;
- 2) Moderate-income – an 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 census tract;

- 3) Middle-income – an 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 census tract; and
- 4) Upper-income – an 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 census tract.

*Additional Guidance: .12(m) Income Level: The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level).*

**Limited-purpose bank:** This term refers to a bank that offers only a narrow product line such as credit card or motor vehicle loans to a regional or broader market and for which a designation as a limited-purpose bank is in effect, in accordance with section 228.25(b).

**Limited review:** Performance under the Lending, Investment and Services test is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, amount of investments and branch office distribution).

**Loan location:** Under this definition, a loan is located as follows:

- 1) Consumer loan is located in the census tract where the borrower resides;
- 2) Home mortgage loan is located in the census tract where the property to which the loan relates is located;
- 3) Small business and small farm loan is located in the census tract where the main business facility or farm is located or where the loan proceeds have been applied as indicated by the borrower.

**Loan production office (LPO):** This term refers to a staffed facility, other than a branch, that is open to the public and that provides lending-related services, such as loan information and applications.

**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 MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) 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 it and half below it.

**Metropolitan Area:** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a single core population of at least 2.5 million may be divided into MDs. A metropolitan statistical area that crosses into two or more bordering states is called a multistate metropolitan statistical area.

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

**Nonmetropolitan area:** This term refers to any area that is not located in a metropolitan statistical area or metropolitan division. Micropolitan statistical areas are included in the definition of a nonmetropolitan area; a micropolitan statistical area has an urban core population of at least 10,000 but less than 50,000.

**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:** This term refers to any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated area:** This term refers to a state or multistate metropolitan area. For institutions with domestic branch offices in one state only, the institution's CRA rating is the state's rating. If the institution maintains domestic branch offices in more than one state, the institution will receive a rating for each state in which those branch offices are located. If the institution maintains domestic branch offices in at least two states in a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan area.

**Small Bank:** This term refers to a bank that as of December 31 of either of the prior two calendar years, had assets of less than \$1.252 billion. Intermediate small bank means a small bank with assets of at least \$313 million as of December 31 of both of the prior two calendar years and less than \$1.252 billion as of December 31 of either of the prior two calendar years.

*Annual Adjustment: The dollar figures in paragraph (u)(1) of this section shall be adjusted annually and published by the Board, based on the year-to-year change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers, not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million.*

**Small Business Loan:** This term refers to a loan that is included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. The loans have original amounts of \$1 million or less and are either secured nonfarm, nonresidential properties or are classified as commercial and industrial loans.

**Small Farm Loan:** This term refers to a loan that is included in “loans to small farms” as defined in the instructions for preparation of the Consolidated Report of Condition and Income. These loans have original amounts of \$500 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Wholesale Bank:** This term refers to a bank that is not in the business of extending home mortgage, small business, small farm or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with section 228.25(b).