

**United Midwest Savings Bank  
Community Reinvestment Act (CRA)**

***Public File***

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## **Section 1**

# **CRA Notice**

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## ***Exhibit A – CRA Notice for Main Office***

### **Community Reinvestment Act Notice**

Under the Federal Community Reinvestment Act (CRA), the Office of the Comptroller of the Currency (OCC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The OCC also takes this record into account when deciding on certain applications submitted by us.

#### **Your Involvement is Encouraged**

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the OCC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the OCC publishes a nationwide list of the banks and savings associations that are scheduled for CRA examination in that quarter. This list is available from the OCC at One Financial Place, Suite 2700, 440 South LaSalle Street, Chicago, IL 60605. You may send written comments about our performance in helping to meet community credit needs to Edward N. Cohn, President, United Midwest Savings Bank, 955 County Line Road West, Westerville, OH 43082 and to the OCC at One Financial Place, Suite 2700, 440 South LaSalle Street, Chicago, IL 60605. Your letter, together with any response by us, will be considered by the OCC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the OCC. You may also request from the OCC an announcement of our applications covered by the CRA filed with the OCC. We are an affiliate of MSB Capital Corporation, a bank holding company. You may request from the Federal Reserve Bank of Cleveland, 1455 East Sixth Street, Cleveland, OH 44114 an announcement of applications covered by the CRA filed by bank holding companies.

## ***Exhibit B – CRA Notice for Branch Offices***

### **Community Reinvestment Act Notice**

Under the Federal Community Reinvestment Act (CRA), the Comptroller of the Currency (OCC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The OCC also takes this record into account when deciding on certain applications submitted by us.

#### Your Involvement is Encouraged

You are entitled to certain information about our operations and our performance under the CRA. You may review today the public section of our most recent CRA evaluation, prepared by the OCC, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make a request to us: (1) A map showing the assessment area containing this branch, which is the area in which the OCC evaluates our CRA performance in this community; (2) information about our branches in this assessment area; (3) a list of services we provide at those locations; (4) data on our lending performance in this assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

If you would like to review information about our CRA performance in other communities served by us, the public file for our entire bank is available at The DeGraff Ohio Office, located at 101 South Main Street, DeGraff, OH 43318.

At least 30 days before the beginning of each quarter, the OCC publishes a nationwide list of the banks and savings associations that are scheduled for CRA examination in that quarter. This list is available from the OCC at One Financial Place, Suite 2700, 440 South LaSalle Street, Chicago, IL 60605. You may send written comments about our performance in helping to meet community credit needs to Edward N. Cohn, President, United Midwest Savings Bank, 955 County Line Road West, Westerville, OH 43082 and to the OCC at One Financial Place, Suite 2700, 440 South LaSalle Street, Chicago, IL 60605. Your letter, together with any response by us, will be considered by the OCC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the OCC. You may also request from the OCC an announcement of our applications covered by the CRA filed with the OCC. We are an affiliate of MSB Capital Corporation, a bank holding company. You may request from the Federal Reserve Bank of Cleveland, 1455 East Sixth Street, Cleveland, OH 44114 an announcement of applications covered by the CRA filed by bank holding companies.

## **Section 2**

# **CRA Statement**

## **COMMUNITY REINVESTMENT ACT STATEMENT**

### **ASSESSMENT OF COMMUNITY**

Our lending community includes all types of neighborhoods and districts and persons of all income levels and races. We do not discriminate against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age (provided the applicant has the capacity to enter into a binding contract), or because all or part of the applicant's income is derived from public assistance, or the fact that the applicant has in good faith exercised any right under the Consumer Credit Protection Act or state law. Designation of our community does not mean we will make no loans outside our community; we will. The assessment of our basic lending community is intended to outline the basic area of operations of the association within which we make every feasible effort to meet community credit needs. The boundaries of our basic lending community are subject to change over time. We will review the assessment of our community regularly and make whatever changes may be appropriate.

United Midwest Savings Bank has six full-service branches and loan production staff in various communities in Ohio. The area contiguous to these offices we consider to make up our lending community. Our assessment area consists of the counties that contain our full-service branches in addition to some surrounding counties. This includes Ohio counties: Champaign, Darke, Franklin, Logan, and Preble.

### **Type of Credit Offered**

The types of credit we offer are limited by law and government regulation. Some of these regulations operate by tying the volume of our lending in certain categories to the financial position of the institution. Changes in economic conditions sometimes make it impossible or impractical to make certain types of loans. We want to maintain a balanced mixture of different types of loans. This can result in certain types of credit needs being unavailable at a given time. In general, the following types of credit may be offered:

#### **Conventional and Non-Conventional Mortgage Loans (1-4 Family Units)**

- a. New or Existing Improvements
- b. Single Family and 2-4 Units
- c. Owner-Occupied and Investment
- d. The maximum loan-to-value ratio is 95% for portfolio product. Loans exceeding 80% of fair market value or the selling price, whichever is lower, may require private mortgage insurance.
- e. Second mortgage loan-to-value ratio shall not exceed 75% if we are not the holder of the first mortgage. (Exceptions granted on these second mortgages for P.M.I.; originated for the secondary market, or loans with a collateral enhancement)

### Conventional Mortgage Loans (Multi-family)

- a. New or existing improvement
- b. Maximum loan-to-value ratio is normally 85% of fair market value or selling price, whichever is lower
- c. Loans in excess of \$300,000 require MAI appraisal

### Other Conventional Mortgage Lending

- a. Land Loans (Agriculture included)
- b. Mortgage on commercial properties
- c. Construction
  - 1. Interim
  - 2. Take-out
- d. Second mortgages
- e. Home improvement/home equity

### Consumer Loans

- a. Secured
- b. Unsecured

### Commercial Loans

- a. Secured
- b. Unsecured

## **ACTIVITIES TO MEET CREDIT NEEDS**

United Midwest Savings Bank uses the news media, primarily newspaper advertising to encourage savings, to announce special services and new account types, and to enhance our image as an equal opportunity lender. The Equal Housing Lender notice and Fair Housing posters are prominently displayed in our lobbies. Copies of our written underwriting standards are readily available.

We make loans to men and women and to all income groups and races in all areas of our lending community. We regularly review our underwriting standards and appraisal procedures to ensure they are nondiscriminatory in purpose and effect. Employees are trained to follow our written loan policies so that all loan programs will be fair, reasonable, and nondiscriminatory.

The President, other Bank Officers and employees maintain a close involvement in civic organizations and community and business affairs to ensure that we are cognizant of developing credit needs and that, by their presence, the officers make the community aware of the availability of our lending services.

## **CRA PERFORMANCE**

United Midwest Savings Bank will continue to meet the needs of the community in its monitoring and lending efforts using safe and sound business practices. We will extend credit to low- and moderate-income areas, small businesses, and community development priorities when proper underwriting qualifications are met. Comments received from the community at large relating to our efforts to serve the community continue to be favorable and indicate a successful level of community reinvestment activity.



## Section 3

# CRA Mission Statement

**UNITED MIDWEST SAVINGS BANK**  
**CRA MISSION STATEMENT**

The bank is committed to serving the needs of our entire community, including low and moderate-income areas. We believe that we can fulfill this commitment, consistent with safe and sound operations, by following several simple guidelines.

First, we will actively seek to understand the credit needs of our market, including low and moderate-income areas.

Second, we will actively strive to assure that our products and services are responsive to the needs of our community, including low and moderate-income areas.

Third, we will actively strive to assure that creditworthy potential customers in our community, including those in low and moderate income areas, are aware of the services we offer and of the fact that we want their business.

Fourth, we will actively work to assure that our own personnel understand and share the bank's commitment to serving low and moderate-income customers and are equipped with the knowledge, products, delivery systems, and motivation needed to do so effectively.

## **Section 4**

# **CRA Policy**

# Community Reinvestment Act Policy

United Midwest Savings Bank ("Bank")

**Board Approval:**  
**Prior Board Action:**  
**Policy Owner:**

**31 May 2024**  
**27 October 2023**  
**CRA Officer**

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- PURPOSE:** The Community Reinvestment Act of 1977 (CRA) and the federal regulators' CRA Regulations were enacted to help ensure that Banks meet the credit needs of their communities. The Regulations provide guidance with regard to the methods regulators will use in assessing the Bank's CRA performance. Each Bank must delineate one or more "assessment areas" within which the regulators will evaluate the Bank's record of helping to meet the credit needs of its community. Each Bank must also make available to the public certain CRA related information. CRA encourages lenders to establish dialogues with local community members regarding their credit needs and to make efforts, within sound credit practices, to help meet those needs. The Board of Directors recognizes its responsibility to establish and implement policies and procedures to achieve compliance with the requirements of the CRA and to serve the community's credit needs, including the needs of low- and moderate-income areas.
- STATEMENT:** The Board of Directors and senior management will take an active role in assuring overall compliance with the CRA. The Board of Directors of the Bank will review and approve the Bank's CRA Policy, including the reasonableness of the delineated assessment area, at least annually and after each material change. All CRA-related discussions are to be documented in minutes of the Board of Directors' meetings. Further, the Board of Directors will review periodic self-assessments of the Bank's CRA compliance efforts. The Bank will make reasonable efforts to ascertain the credit needs of the community and to develop and market products and services to meet those needs. All of the Bank's directors, officers and employees are encouraged to be familiar with the Bank's CRA goals and responsibilities. It is the Bank's policy to comply with the standards imposed by CRA and related regulations by making safe and sound loans and investments and providing safe and sound services on which the Bank expects to make a profit. The Bank will develop and apply flexible underwriting standards for loans that benefit low- or moderate-income geographies or individuals which are consistent with safe and sound banking practices.
- CRA COMPLIANCE OFFICER:** Michael Childs is designated as the CRA Officer, the person responsible for coordinating, documenting, and monitoring the Bank's CRA program. The Bank's Board of Directors recognizes that CRA regulations are subject to change and that certain CRA regulations may or may not be effective as to the Bank, or may become effective as to the Bank on different dates, depending on certain factors and alternative forms of CRA compliance which are available to the Bank under applicable regulations. The Board of Directors, with the guidance and assistance of the Chief Risk Management Officer, intends to ensure that the Bank complies with such regulations in a proper and timely manner.

The CRA Officer's responsibilities will include reporting periodically, but not less than annually, to the Board of Directors concerning the Bank's CRA efforts, performance, and, if appropriate, areas for improvement.

- ASSESSMENT AREA:** The Bank's designated assessment area shall be as described

on Exhibit A attached hereto and made a part hereof.

5. **CRA NOTICE:** The Bank will provide in the lobby of its main office and each of its branches a public CRA Notice which conforms in form and substance with the applicable regulatory requirements as set forth in the attached Exhibits B.
6. **CRA PUBLIC FILE:** The Bank will maintain a public file, in which it will assemble all information and documents required by then effective regulations applicable to the Bank. Upon request, the Bank will provide copies of the information in its public file to any persons requesting such information. Such information will be provided in paper or other form acceptable to the person making the request. If the Bank charges fees for such service, the fees will be reasonable and will not exceed copying and mailing costs (if applicable). The information contained in the Bank's public file will be made available at the Bank's main branch office and, if the Bank is an interstate Bank, at one branch office in each state. The Bank will make available at each of its branches: (i) a copy of the public section of its most recent CRA Performance Evaluation and a list of services provided by the branch; and (ii) within five calendar days of a request, all the information in the public file relating to the assessment area in which the branch is located. The Bank will update its public file in order to ensure that the information contained therein will be current as of April of each year.
7. **DATA COLLECTION, REPORTING AND DISCLOSURE:** The Bank will assemble, collect and maintain such CRA related information as may be required by applicable regulations in form and substance which are fully compliant with such regulations, including in a machine-readable format as prescribed by the regulators.
8. **Community Reinvestment Act: Interagency Final Rulemaking to Implement the CRA**

On October 24, 2023, the Office of the Comptroller of the Currency (OCC), Federal Reserve System (FRB) and the Federal Deposit Insurance Corporation (FDIC) issued a final rule to strengthen and modernize regulations implementing the Community Reinvestment Act (CRA) to better achieve the purposes of the law.

To promote clarity and consistency, the agencies extended the applicability date of the facility-based assessment areas and public file provisions from April 1, 2024, to January 1, 2026.

## EXHIBIT A

### ASSESSMENT AREA(S)



The Bank has six domestic branch offices. All six branch offices are located in the State of Ohio.

Four of the six branch offices are located in Franklin County; two branch offices are located in Columbus, Ohio, one branch office is located in Westerville, Ohio, and one branch office is located in Worthington, Ohio.

Two of the six branch offices are located in the rural counties, the main branch office is located in De Graff, Ohio in Logan County and a branch office is located in West Manchester, Ohio in Preble County.

The Bank has designated two CRA assessment areas: 1) Franklin County and 2) a rural assessment area composed of Logan, Champaign, Preble, and Darke Counties. The two rural branch offices are located in Logan and Preble counties. Champaign and Darke counties were included in the rural assessment area due to deposit dispersion and branch office proximity to

county borders.

The Bank's Ohio Assessment Areas are as follows:

Rural Depository Offices: The main branch office is located in DeGraff, Ohio in Logan County and a branch office is located in West Manchester, Ohio in Preble County.

Rural Assessment Area: Logan, Champaign, Preble and Darke Counties of Ohio

Franklin County Depository Offices: Two branch offices are located in Columbus, Ohio, one branch office is located in Westerville, Ohio and one branch office is located in Worthington, Ohio. All four branch offices are located in Franklin County.

Assessment Area: Franklin County of Ohio

## **Exhibit B**

### **CRA Notice for Main Office**

## **Community Reinvestment Act Notice**

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If you would like to review information about our CRA performance in other communities served by us, the public file for our entire bank is available at the DeGraff Ohio Office, located at 101 South Main Street, DeGraff, OH 43318.

At least 30 days before the beginning of each quarter, the OCC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from OCC at One Financial Place, Suite 2700, 440 South LaSalle Street, Chicago, IL 60605. You may send written comments about our performance in helping to meet community credit needs to Edward N. Cohn, President, United Midwest Savings Bank, 955 County Line Road West, Westerville, OH 43082 and the OCC at One Financial Place, Suite 2700, 440 South LaSalle Street, Chicago, IL 60605. Your letter, together with any response by us, will be considered by the OCC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the OCC. You may also request from the OCC an announcement of our applications covered by the CRA filed with the OCC. We are an affiliate of MSB Capital Corporation, a bank holding company. You may request from the Federal Reserve Bank of Cleveland, 1455 East Sixth Street, Cleveland, OH 44114 an announcement of applications covered by the CRA filed by bank holding companies.

## Section 5

# Equal Credit Opportunity Act Statement

## **EQUAL CREDIT OPPORTUNITY ACT STATEMENT**

This bank believes in fairness in lending. We make credit available to all people and organizations on a fair and consistent basis, without regard to age, race, color, religion, national origin, sex, marital status, receipt of public assistance, or exercise of legal rights against the bank.

We believe that all of our customers and prospective customers deserve the very best products and service we can give them. We are committed to assuring that our personnel make all potential customers feel welcome, and make all customers feel valued by us.

Every employee of our bank is responsible for assuring non-discrimination in his or her own work. Every manager is responsible for assuring it in his or her area.

If we detect or have reason to suspect discrimination by an employee of this bank, we will promptly investigate the matter and take appropriate action, which may include reversal of the decision of individuals involved, as well as the potential for disciplinary action and dismissal.

We believe that this commitment to fairness is not only our obligation as corporate citizens, but is also fundamental to good business practice.

## **Section 6**

# **Assessment Area Maps**

## ASSESSMENT AREA (S)



The Bank's Ohio Assessment Areas are as follows:

Rural Depository Offices: The main branch office is located in DeGraff, Ohio in Logan County and a branch office is located in West Manchester, Ohio in Preble County.

- Rural Assessment Area: Logan, Champaign, Preble, and Darke Counties of Ohio

Franklin County Depository Offices: Two branch offices are located in Columbus, Ohio, one branch office is located in Westerville, Ohio and one branch office is located in Worthington, Ohio. All four branch offices are located in Franklin County.

- Assessment Area: Franklin County of Ohio



### ***United Midwest Savings Bank Branch Locations***

1. DeGraff Branch  
101 S. Main Street  
DeGraff, Ohio 43318  
County: 091 – Logan County  
Tract Code (0043.00)
  
2. West Manchester Branch  
101 N. Main Street  
West Manchester, Ohio 45382  
County: 135 – Preble County  
Tract Code: (4101.00)
  
3. State Street Branch  
780 S. State Street  
Westerville, Ohio 43081  
County: 049 – Franklin County  
Tract Code: (0071.01)
  
4. Reed Road Branch  
4848 Reed Rd.  
Columbus, Ohio 43220  
County: 049 - Franklin County  
Tract Code: (0063.53)
  
5. Broad Street Branch  
3011 E. Broad St.  
Columbus, Ohio 43209  
County: 049 - Franklin County  
Tract Code: (0027.40)
  
6. 547 High Street Branch  
547 High Street  
Worthington, Ohio 43085  
Tract Code: (0067.10)



## 2024 FFIEC Geocode Census Report

Address: 101 S Main St, De Graff, Ohio, 43318

MSA: NA - NA (Outside of MSA)

State: 39 - OHIO

County: 091 - LOGAN COUNTY

Tract Code: 0043.00

### Summary Census Demographic Information

Tract Income Level	Upper
Underserved or Distressed Tract	No
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$81,600
2024 Estimated Tract Median Family Income	\$99,193
2020 Tract Median Family Income	\$80,426
Tract Median Family Income %	121.56
Tract Population	5484
Tract Minority %	5.09
Tract Minority Population	279
Owner-Occupied Units	2094
1- to 4- Family Units	2672

### Census Income Information

Tract Income Level	Upper
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$66,160
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$81,600
% below Poverty Line	8.43
Tract Median Family Income %	121.56
2020 Tract Median Family Income	\$80,426
2024 Estimated Tract Median Family Income	\$99,193
2020 Tract Median Household Income	\$63,259

### Census Population Information

Tract Population	5484
Tract Minority %	5.09
Number of Families	1531
Number of Households	2386
Non-Hispanic White Population	5205
Tract Minority Population	279
American Indian Population	2
Asian/Hawaiian/Pacific Islander Population	16
Black Population	17
Hispanic Population	43
Other/Two or More Races Population	201

### Census Housing Information

Total Housing Units	2690
1- to 4- Family Units	2672
Median House Age (Years)	53
Owner-Occupied Units	2094
Renter Occupied Units	292
Owner Occupied 1- to 4- Family Units	2094
Inside Principal City?	NO
Vacant Units	304

2024 FFIEC Census Report - Summary Census Demographic Information

State: 39 - OHIO (OH)

County: 091 - LOGAN COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	091	0038.00	Middle	No	115.33	\$81,600	\$94,109	\$76,308	3827	5.77	221	1072	1479
39	091	0039.00	Middle	No	116.24	\$81,600	\$94,852	\$76,905	4519	6.48	293	1460	1923
39	091	0040.00	Middle	No	118.35	\$81,600	\$96,574	\$78,304	2590	4.40	114	1360	2793
39	091	0041.00	Middle	No	85.23	\$81,600	\$69,548	\$56,389	2780	7.91	220	910	2219
39	091	0042.00	Moderate	No	64.80	\$81,600	\$52,877	\$42,875	1787	9.68	173	599	1513
39	091	0043.00	Upper	No	121.56	\$81,600	\$99,193	\$80,426	5484	5.09	279	2094	2672
39	091	0044.00	Moderate	No	75.73	\$81,600	\$61,796	\$50,103	5542	18.03	999	912	2028
39	091	0045.00	Middle	No	94.61	\$81,600	\$77,202	\$62,596	4302	15.39	662	952	1735
39	091	0046.00	Upper	No	122.55	\$81,600	\$100,001	\$81,082	5440	13.84	753	1671	2114
39	091	0047.00	Upper	No	126.54	\$81,600	\$103,257	\$83,719	5415	6.74	365	1854	2193
39	091	0048.00	Upper	No	133.61	\$81,600	\$109,026	\$88,398	4464	7.21	322	1251	1681

\* Will automatically be included in the 2025 Distressed or Underserved Tract List



2024 FFIEC Census Report - Summary Census Demographic Information

State: 39 - OHIO (OH)

County: 021 - CHAMPAIGN COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	021	0101.00	Middle	No	117.65	\$81,600	\$96,002	\$77,841	1872	8.07	151	597	707
39	021	0102.00	Upper	No	121.42	\$81,600	\$99,079	\$80,333	6668	7.39	493	2288	3124
39	021	0104.00	Middle	No	94.46	\$81,600	\$77,079	\$62,500	3893	12.05	469	883	1674
39	021	0105.00	Middle	No	90.68	\$81,600	\$73,995	\$60,000	3996	11.81	472	903	1689
39	021	0106.00	Middle	No	104.54	\$81,600	\$85,305	\$69,167	3714	16.32	606	993	1474
39	021	0110.01	Middle	No	107.57	\$81,600	\$87,777	\$71,169	2683	5.78	155	880	1077
39	021	0115.01	Middle	No	116.65	\$81,600	\$95,186	\$77,176	4350	5.13	223	1343	1654
39	021	0115.04	Middle	No	110.46	\$81,600	\$90,135	\$73,081	5117	8.72	446	1867	2302
39	021	0115.05	Middle	No	101.25	\$81,600	\$82,620	\$66,992	3262	6.77	221	753	1283
39	021	0115.06	Middle	No	108.63	\$81,600	\$88,642	\$71,875	3159	5.19	164	761	1136

\* Will automatically be included in the 2025 Distressed or Underserved Tract List



## 2024 FFIEC Geocode Census Report

Address: 101 N Main St, West Manchester, Ohio, 45382

MSA: NA - NA (Outside of MSA)

State: 39 - OHIO

County: 135 - PREBLE COUNTY

Tract Code: 4101.00

### Summary Census Demographic Information

Tract Income Level	Middle
Underserved or Distressed Tract	No
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$81,600
2024 Estimated Tract Median Family Income	\$75,235
2020 Tract Median Family Income	\$61,005
Tract Median Family Income %	92.20
Tract Population	2084
Tract Minority %	5.47
Tract Minority Population	114
Owner-Occupied Units	631
1- to 4- Family Units	908

### Census Income Information

Tract Income Level	Middle
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$66,160
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$81,600
% below Poverty Line	11.01
Tract Median Family Income %	92.20
2020 Tract Median Family Income	\$61,005
2024 Estimated Tract Median Family Income	\$75,235
2020 Tract Median Household Income	\$59,167

### Census Population Information

Tract Population	2084
Tract Minority %	5.47
Number of Families	579
Number of Households	800
Non-Hispanic White Population	1970
Tract Minority Population	114
American Indian Population	4
Asian/Hawaiian/Pacific Islander Population	17
Black Population	3
Hispanic Population	24
Other/Two or More Races Population	66

### Census Housing Information

Total Housing Units	921
1- to 4- Family Units	908
Median House Age (Years)	0
Owner-Occupied Units	631
Renter Occupied Units	169
Owner Occupied 1- to 4- Family Units	631
Inside Principal City?	NO
Vacant Units	121

2024 FFIEC Census Report - Summary Census Demographic Information

State: 39 - OHIO (OH)

County: 135 - PREBLE COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	135	4001.00	Middle	No	112.08	\$81,600	\$91,457	\$74,156	3226	6.70	216	941	1509
39	135	4101.00	Middle	No	92.20	\$81,600	\$75,235	\$61,005	2084	5.47	114	631	908
39	135	4201.00	Middle	No	103.62	\$81,600	\$84,554	\$68,561	4305	4.62	199	1460	1867
39	135	4301.00	Upper	No	130.45	\$81,600	\$106,447	\$86,307	2669	4.80	128	856	1062
39	135	4401.00	Middle	No	100.10	\$81,600	\$81,682	\$66,228	3730	5.04	188	1185	1491
39	135	4501.00	Upper	No	123.91	\$81,600	\$101,111	\$81,979	2161	5.09	110	784	1021
39	135	4550.01	Middle	No	117.21	\$81,600	\$95,643	\$77,548	2273	7.22	164	633	872
39	135	4550.02	Middle	No	111.90	\$81,600	\$91,310	\$74,036	5750	7.95	457	1536	2340
39	135	4601.00	Middle	No	110.94	\$81,600	\$90,527	\$73,400	2840	4.89	139	762	1079
39	135	4701.01	Upper	No	124.36	\$81,600	\$101,478	\$82,277	3573	6.24	223	1362	1596
39	135	4701.02	Middle	No	93.36	\$81,600	\$76,182	\$61,771	4167	4.15	173	1198	1755
39	135	4801.00	Upper	No	121.74	\$81,600	\$99,340	\$80,548	4221	4.45	188	1469	1833

\* Will automatically be included in the 2025 Distressed or Underserved Tract List

2024 FFIEC Census Report - Summary Census Demographic Information

State: 39 - OHIO (OH)

County: 037 - DARKE COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	037	5001.00	Upper	No	137.59	\$81,600	\$112,273	\$91,034	4057	3.60	146	1179	1474
39	037	5101.00	Middle	No	81.80	\$81,600	\$66,749	\$54,125	3954	10.27	406	1004	1612
39	037	5201.00	Middle	No	99.76	\$81,600	\$81,404	\$66,005	3440	4.07	140	964	1404
39	037	5301.00	Upper	No	130.20	\$81,600	\$106,243	\$86,146	4491	2.76	124	1340	1805
39	037	5401.00	Middle	No	96.46	\$81,600	\$78,711	\$63,824	3343	5.35	179	1081	1561
39	037	5501.00	Middle	No	110.24	\$81,600	\$89,956	\$72,936	3494	4.98	174	1117	1378
39	037	5550.01	Upper	No	121.86	\$81,600	\$99,438	\$80,625	2675	6.39	171	889	1106
39	037	5550.02	Middle	No	117.50	\$81,600	\$95,880	\$77,743	3795	7.38	280	1119	1508
39	037	5551.01	Middle	No	84.66	\$81,600	\$69,083	\$56,012	3250	7.17	233	794	1825
39	037	5551.02	Low	No	48.83	\$81,600	\$39,845	\$32,306	3715	9.31	346	644	1734
39	037	5601.01	Middle	No	111.74	\$81,600	\$91,180	\$73,929	3619	4.06	147	1261	1626
39	037	5601.02	Middle	No	93.79	\$81,600	\$76,533	\$62,054	3184	5.65	180	1063	1503
39	037	5701.01	Middle	No	117.64	\$81,600	\$95,994	\$77,833	2968	4.31	128	907	1249
39	037	5701.02	Middle	No	112.10	\$81,600	\$91,474	\$74,167	5896	3.95	233	1621	2386

\* Will automatically be included in the 2025 Distressed or Underserved Tract List



## 2024 FFIEC Geocode Census Report

Address: 780 S State St, Westerville, Ohio, 43081

MSA: 18140 - COLUMBUS, OH

State: 39 - OHIO

County: 049 - FRANKLIN COUNTY

Tract Code: 0071.01

### Summary Census Demographic Information

Tract Income Level	Moderate
Underserved or Distressed Tract	No
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$103,300
2024 Estimated Tract Median Family Income	\$79,025
2020 Tract Median Family Income	\$64,330
Tract Median Family Income %	76.50
Tract Population	3239
Tract Minority %	27.69
Tract Minority Population	897
Owner-Occupied Units	867
1- to 4- Family Units	1187

### Census Income Information

Tract Income Level	Moderate
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$84,088
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$103,300
% below Poverty Line	7.11
Tract Median Family Income %	76.50
2020 Tract Median Family Income	\$64,330
2024 Estimated Tract Median Family Income	\$79,025
2020 Tract Median Household Income	\$67,339

### Census Population Information

Tract Population	3239
Tract Minority %	27.69
Number of Families	929
Number of Households	1240
Non-Hispanic White Population	2342
Tract Minority Population	897
American Indian Population	4
Asian/Hawaiian/Pacific Islander Population	72
Black Population	440
Hispanic Population	156
Other/Two or More Races Population	225

### Census Housing Information

Total Housing Units	1362
1- to 4- Family Units	1187
Median House Age (Years)	42
Owner-Occupied Units	867
Renter Occupied Units	373
Owner Occupied 1- to 4- Family Units	867
Inside Principal City?	NO
Vacant Units	122



## 2024 FFIEC Geocode Census Report

Address: 4848 Reed Rd, Columbus, Ohio, 43220

MSA: 18140 - COLUMBUS, OH

State: 39 - OHIO

County: 049 - FRANKLIN COUNTY

Tract Code: 0063.53

### Summary Census Demographic Information

Tract Income Level	Middle
Underserved or Distressed Tract	No
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$103,300
2024 Estimated Tract Median Family Income	\$94,902
2020 Tract Median Family Income	\$77,255
Tract Median Family Income %	91.87
Tract Population	4806
Tract Minority %	36.97
Tract Minority Population	1777
Owner-Occupied Units	944
1- to 4- Family Units	1560

### Census Income Information

Tract Income Level	Middle
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$84,088
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$103,300
% below Poverty Line	8.81
Tract Median Family Income %	91.87
2020 Tract Median Family Income	\$77,255
2024 Estimated Tract Median Family Income	\$94,902
2020 Tract Median Household Income	\$45,498

### Census Population Information

Tract Population	4806
Tract Minority %	36.97
Number of Families	974
Number of Households	2770
Non-Hispanic White Population	3029
Tract Minority Population	1777
American Indian Population	11
Asian/Hawaiian/Pacific Islander Population	731
Black Population	436
Hispanic Population	314
Other/Two or More Races Population	285

### Census Housing Information

Total Housing Units	2906
1- to 4- Family Units	1560
Median House Age (Years)	44
Owner-Occupied Units	944
Renter Occupied Units	1826
Owner Occupied 1- to 4- Family Units	854
Inside Principal City?	YES
Vacant Units	136



## 2024 FFIEC Geocode Census Report

Address: 3011 E Broad St, Columbus, Ohio, 43209

MSA: 18140 - COLUMBUS, OH

State: 39 - OHIO

County: 049 - FRANKLIN COUNTY

Tract Code: 0027.40

### Summary Census Demographic Information

Tract Income Level	Upper
Underserved or Distressed Tract	No
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$103,300
2024 Estimated Tract Median Family Income	\$140,498
2020 Tract Median Family Income	\$114,375
Tract Median Family Income %	136.01
Tract Population	2447
Tract Minority %	28.48
Tract Minority Population	697
Owner-Occupied Units	846
1- to 4- Family Units	1069

### Census Income Information

Tract Income Level	Upper
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$84,088
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$103,300
% below Poverty Line	8.31
Tract Median Family Income %	136.01
2020 Tract Median Family Income	\$114,375
2024 Estimated Tract Median Family Income	\$140,498
2020 Tract Median Household Income	\$89,063

### Census Population Information

Tract Population	2447
Tract Minority %	28.48
Number of Families	702
Number of Households	1088
Non-Hispanic White Population	1750
Tract Minority Population	697
American Indian Population	4
Asian/Hawaiian/Pacific Islander Population	19
Black Population	458
Hispanic Population	102
Other/Two or More Races Population	114

### Census Housing Information

Total Housing Units	1115
1- to 4- Family Units	1069
Median House Age (Years)	67
Owner-Occupied Units	846
Renter Occupied Units	242
Owner Occupied 1- to 4- Family Units	846
Inside Principal City?	YES
Vacant Units	27



## 2024 FFIEC Geocode Census Report

Address: 547 High St, Worthington, Ohio, 43085

MSA: 18140 - COLUMBUS, OH

State: 39 - OHIO

County: 049 - FRANKLIN COUNTY

Tract Code: 0067.10

### Summary Census Demographic Information

Tract Income Level	Upper
Underserved or Distressed Tract	No
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$103,300
2024 Estimated Tract Median Family Income	\$139,734
2020 Tract Median Family Income	\$113,750
Tract Median Family Income %	135.27
Tract Population	2894
Tract Minority %	14.31
Tract Minority Population	414
Owner-Occupied Units	764
1- to 4- Family Units	1121

### Census Income Information

Tract Income Level	Upper
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$84,088
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$103,300
% below Poverty Line	6.24
Tract Median Family Income %	135.27
2020 Tract Median Family Income	\$113,750
2024 Estimated Tract Median Family Income	\$139,734
2020 Tract Median Household Income	\$77,209

### Census Population Information

Tract Population	2894
Tract Minority %	14.31
Number of Families	765
Number of Households	1260
Non-Hispanic White Population	2480
Tract Minority Population	414
American Indian Population	4
Asian/Hawaiian/Pacific Islander Population	61
Black Population	108
Hispanic Population	79
Other/Two or More Races Population	162

### Census Housing Information

Total Housing Units	1332
1- to 4- Family Units	1121
Median House Age (Years)	61
Owner-Occupied Units	764
Renter Occupied Units	496
Owner Occupied 1- to 4- Family Units	708
Inside Principal City?	NO
Vacant Units	72



2024 FFIEC Census Report - Summary Census Demographic Information

State: 39 - OHIO (OH)

County: 049 - FRANKLIN COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	049	0001.10	Middle	No	113.54	\$103,300	\$117,287	\$95,476	3489	9.31	325	1554	1871
39	049	0001.20	Upper	No	184.96	\$103,300	\$191,064	\$155,532	3220	9.10	293	1373	1685
39	049	0002.10	Upper	No	141.31	\$103,300	\$145,973	\$118,833	3049	11.97	365	1142	1383
39	049	0002.20	Upper	No	142.12	\$103,300	\$146,810	\$119,510	4186	10.42	436	1647	1821
39	049	0003.10	Moderate	No	73.86	\$103,300	\$76,297	\$62,115	3377	38.79	1310	699	1383
39	049	0003.20	Moderate	No	55.00	\$103,300	\$56,815	\$46,250	2505	29.50	739	820	1204
39	049	0003.30	Low	No	36.42	\$103,300	\$37,622	\$30,625	2427	44.33	1076	440	1067
39	049	0004.10	Middle	No	109.79	\$103,300	\$113,413	\$92,321	2439	12.83	313	366	1135
39	049	0004.20	Upper	No	152.25	\$103,300	\$157,274	\$128,026	3316	11.34	376	994	1537
39	049	0005.00	Middle	No	104.05	\$103,300	\$107,484	\$87,500	4187	20.18	845	901	1529
39	049	0006.00	Middle	No	88.89	\$103,300	\$91,823	\$74,750	3839	19.61	753	429	1499
39	049	0007.10	Low	No	47.72	\$103,300	\$49,295	\$40,132	3339	50.61	1690	643	1570
39	049	0007.20	Low	No	33.12	\$103,300	\$34,213	\$27,852	2583	79.06	2042	317	1201
39	049	0007.30	Low	No	21.42	\$103,300	\$22,127	\$18,012	3629	91.79	3331	487	1632
39	049	0008.10	Moderate	No	56.37	\$103,300	\$58,230	\$47,401	2747	46.27	1271	580	1243
39	049	0008.20	Moderate	No	67.74	\$103,300	\$69,975	\$56,964	3193	60.01	1916	937	1532
39	049	0009.10	Low	No	43.51	\$103,300	\$44,946	\$36,595	3693	77.77	2872	550	1549
39	049	0009.20	Low	No	37.68	\$103,300	\$38,923	\$31,691	2209	81.98	1811	325	967
39	049	0010.00	Moderate	No	60.86	\$103,300	\$62,868	\$51,179	5613	23.16	1300	295	1360
39	049	0011.10	Middle	No	93.65	\$103,300	\$96,740	\$78,750	3751	31.86	1195	40	536
39	049	0011.21	Unknown	No	0.00	\$103,300	\$0	\$0	12131	11.43	1387	0	16
39	049	0011.22	Moderate	No	66.60	\$103,300	\$68,798	\$56,010	3268	24.33	795	139	162
39	049	0012.00	Low	No	41.12	\$103,300	\$42,477	\$34,583	5201	23.82	1239	69	474
39	049	0013.01	Unknown	No	0.00	\$103,300	\$0	\$0	2903	30.35	881	102	637
39	049	0013.02	Unknown	No	0.00	\$103,300	\$0	\$0	3039	19.28	586	0	148
39	049	0014.00	Low	No	35.74	\$103,300	\$36,919	\$30,060	1531	85.89	1315	203	647

\* Will automatically be included in the 2025 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	049	0015.00	Low	No	36.22	\$103,300	\$37,415	\$30,457	2092	93.45	1955	223	824
39	049	0016.00	Low	No	40.13	\$103,300	\$41,454	\$33,750	2399	48.15	1155	200	953
39	049	0017.00	Low	No	38.45	\$103,300	\$39,719	\$32,339	3994	40.44	1615	119	656
39	049	0018.10	Low	No	13.24	\$103,300	\$13,677	\$11,141	4324	32.65	1412	22	750
39	049	0018.20	Upper	No	158.06	\$103,300	\$163,276	\$132,917	2478	21.79	540	368	948
39	049	0019.01	Upper	No	159.80	\$103,300	\$165,073	\$134,375	4059	24.37	989	187	698
39	049	0019.02	Middle	No	111.14	\$103,300	\$114,808	\$93,456	4063	15.95	648	316	2338
39	049	0020.00	Upper	No	204.21	\$103,300	\$210,949	\$171,719	3259	18.20	593	697	1552
39	049	0021.00	Upper	No	165.21	\$103,300	\$170,662	\$138,929	2456	17.26	424	202	636
39	049	0022.00	Middle	No	102.57	\$103,300	\$105,955	\$86,250	4279	21.99	941	448	1030
39	049	0023.00	Low	No	42.32	\$103,300	\$43,717	\$35,587	1503	77.84	1170	288	760
39	049	0025.10	Low	No	47.81	\$103,300	\$49,388	\$40,208	3144	86.99	2735	720	1308
39	049	0025.20	Moderate	No	75.12	\$103,300	\$77,599	\$63,173	2784	68.50	1907	634	1065
39	049	0026.00	Low	No	31.10	\$103,300	\$32,126	\$26,157	3920	79.74	3126	418	1580
39	049	0027.10	Low	No	42.88	\$103,300	\$44,295	\$36,060	1908	78.46	1497	17	693
39	049	0027.30	Low	No	38.27	\$103,300	\$39,533	\$32,188	2183	82.64	1804	140	1035
39	049	0027.40	Upper	No	136.01	\$103,300	\$140,498	\$114,375	2447	28.48	697	846	1069
39	049	0027.50	Low	No	27.78	\$103,300	\$28,697	\$23,363	2554	81.36	2078	341	1038
39	049	0027.60	Moderate	No	68.29	\$103,300	\$70,544	\$57,431	3331	47.28	1575	687	1664
39	049	0027.70	Low	No	42.61	\$103,300	\$44,016	\$35,833	2300	84.00	1932	351	715
39	049	0027.80	Middle	No	108.00	\$103,300	\$111,564	\$90,816	2353	43.90	1033	780	1127
39	049	0028.00	Low	No	40.52	\$103,300	\$41,857	\$34,080	2461	79.48	1956	390	1097
39	049	0029.00	Low	No	16.59	\$103,300	\$17,137	\$13,952	2887	88.47	2554	110	496
39	049	0030.00	Upper	No	155.34	\$103,300	\$160,466	\$130,625	4189	26.00	1089	554	208
39	049	0032.00	Upper	No	120.82	\$103,300	\$124,807	\$101,600	3500	19.77	692	254	259
39	049	0036.00	Middle	No	106.23	\$103,300	\$109,736	\$89,327	2039	64.64	1318	372	947
39	049	0037.00	Middle	No	86.48	\$103,300	\$89,334	\$72,724	3389	57.33	1943	663	1550
39	049	0038.00	Unknown	No	0.00	\$103,300	\$0	\$0	2105	41.38	871	469	918
39	049	0040.01	Unknown	No	0.00	\$103,300	\$0	\$0	1253	31.21	391	74	93

\* Will automatically be included in the 2025 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	049	0040.02	Upper	No	138.71	\$103,300	\$143,287	\$116,641	4245	38.70	1643	295	51
39	049	0042.00	Low	No	19.09	\$103,300	\$19,720	\$16,058	1107	42.28	468	46	187
39	049	0043.01	Upper	No	145.32	\$103,300	\$150,116	\$122,200	3532	18.04	637	466	566
39	049	0043.02	Low	No	34.39	\$103,300	\$35,525	\$28,925	1740	45.92	799	233	778
39	049	0045.00	Moderate	No	54.98	\$103,300	\$56,794	\$46,238	5048	41.64	2102	920	2305
39	049	0046.10	Middle	No	94.91	\$103,300	\$98,042	\$79,808	3298	20.47	675	1323	1688
39	049	0046.20	Low	No	42.49	\$103,300	\$43,892	\$35,735	2609	46.34	1209	293	1023
39	049	0047.00	Low	No	49.05	\$103,300	\$50,669	\$41,250	5138	58.00	2980	532	2053
39	049	0048.10	Moderate	No	70.85	\$103,300	\$73,188	\$59,583	2929	34.11	999	945	1293
39	049	0048.20	Moderate	No	57.43	\$103,300	\$59,325	\$48,295	2685	46.29	1243	410	1026
39	049	0049.00	Low	No	48.58	\$103,300	\$50,183	\$40,850	5686	47.91	2724	850	2187
39	049	0050.01	Low	No	35.67	\$103,300	\$36,847	\$30,000	1647	35.76	589	244	710
39	049	0050.02	Unknown	No	0.00	\$103,300	\$0	\$0	3095	42.13	1304	221	1254
39	049	0051.00	Low	No	20.54	\$103,300	\$21,218	\$17,277	2548	67.15	1711	137	447
39	049	0052.00	Middle	No	103.12	\$103,300	\$106,523	\$86,713	3125	14.94	467	720	1426
39	049	0053.00	Low	No	47.12	\$103,300	\$48,675	\$39,625	2676	64.24	1719	346	1312
39	049	0054.10	Low	No	32.67	\$103,300	\$33,748	\$27,473	1418	81.59	1157	198	792
39	049	0054.20	Unknown	No	0.00	\$103,300	\$0	\$0	2082	85.21	1774	259	1100
39	049	0055.00	Low	No	43.53	\$103,300	\$44,966	\$36,607	4062	83.68	3399	687	2106
39	049	0056.10	Low	No	45.04	\$103,300	\$46,526	\$37,875	1646	60.81	1001	328	934
39	049	0056.20	Low	No	46.97	\$103,300	\$48,520	\$39,500	2422	51.07	1237	350	1217
39	049	0057.00	Upper	No	151.01	\$103,300	\$155,993	\$126,985	3715	12.57	467	1094	1916
39	049	0058.10	Upper	No	126.05	\$103,300	\$130,210	\$105,996	2719	14.60	397	858	1458
39	049	0058.20	Middle	No	106.26	\$103,300	\$109,767	\$89,358	2127	19.23	409	626	1144
39	049	0059.00	Low	No	49.65	\$103,300	\$51,288	\$41,750	2365	73.36	1735	360	1111
39	049	0060.00	Low	No	48.06	\$103,300	\$49,646	\$40,417	2224	48.34	1075	302	723
39	049	0061.00	Low	No	40.03	\$103,300	\$41,351	\$33,661	2534	42.11	1067	303	1221
39	049	0062.36	Upper	No	232.42	\$103,300	\$240,090	\$195,441	6192	17.60	1090	1897	1925

\* Will automatically be included in the 2025 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	049	0062.37	Upper	No	121.70	\$103,300	\$125,716	\$102,338	5953	24.68	1469	1283	1866
39	049	0062.38	Upper	No	152.30	\$103,300	\$157,326	\$128,068	1892	22.04	417	646	737
39	049	0062.39	Upper	No	130.07	\$103,300	\$134,362	\$109,375	6516	49.98	3257	834	1557
39	049	0062.40	Middle	No	98.56	\$103,300	\$101,812	\$82,885	5998	27.48	1648	1635	2040
39	049	0062.41	Middle	No	109.23	\$103,300	\$112,835	\$91,855	9531	38.25	3646	1467	2471
39	049	0063.01	Middle	No	95.57	\$103,300	\$98,724	\$80,368	3155	30.02	947	657	1001
39	049	0063.02	Moderate	No	65.13	\$103,300	\$67,279	\$54,767	4613	39.06	1802	576	1445
39	049	0063.10	Upper	No	222.42	\$103,300	\$229,760	\$187,031	4857	13.47	654	1437	1548
39	049	0063.21	Upper	No	179.23	\$103,300	\$185,145	\$150,714	4436	14.45	641	1316	1418
39	049	0063.23	Upper	No	165.38	\$103,300	\$170,838	\$139,073	3570	16.39	585	1208	1365
39	049	0063.30	Upper	No	137.38	\$103,300	\$141,914	\$115,521	4941	13.56	670	1698	2039
39	049	0063.40	Upper	No	172.37	\$103,300	\$178,058	\$144,943	3392	19.63	666	1043	1418
39	049	0063.51	Middle	No	97.76	\$103,300	\$100,986	\$82,206	4116	24.27	999	1058	1917
39	049	0063.52	Moderate	No	76.04	\$103,300	\$78,549	\$63,942	3290	41.06	1351	105	925
39	049	0063.53	Middle	No	91.87	\$103,300	\$94,902	\$77,255	4806	36.97	1777	944	1560
39	049	0063.72	Middle	No	81.16	\$103,300	\$83,838	\$68,250	7614	41.88	3189	979	2027
39	049	0063.84	Upper	No	128.17	\$103,300	\$132,400	\$107,778	6276	26.59	1669	1096	1586
39	049	0063.86	Middle	No	116.25	\$103,300	\$120,086	\$97,760	6014	33.62	2022	727	1137
39	049	0063.87	Upper	No	129.42	\$103,300	\$133,691	\$108,830	6512	29.01	1889	1341	1689
39	049	0063.91	Upper	No	233.75	\$103,300	\$241,464	\$196,563	5664	15.18	860	1783	1875
39	049	0063.92	Upper	No	195.80	\$103,300	\$202,261	\$164,652	4644	14.49	673	1423	1559
39	049	0063.93	Upper	No	141.59	\$103,300	\$146,262	\$119,063	5343	22.38	1196	1646	1886
39	049	0063.94	Upper	No	124.55	\$103,300	\$128,660	\$104,732	2753	20.05	552	1093	1207
39	049	0063.95	Middle	No	94.76	\$103,300	\$97,887	\$79,688	3713	35.95	1335	872	1246
39	049	0063.96	Middle	No	95.73	\$103,300	\$98,889	\$80,500	5472	30.94	1693	1205	1241
39	049	0063.97	Middle	No	96.21	\$103,300	\$99,385	\$80,903	6680	35.70	2385	1171	1947
39	049	0063.98	Upper	No	210.05	\$103,300	\$216,982	\$176,635	3592	33.55	1205	1143	1129
39	049	0064.10	Upper	No	209.07	\$103,300	\$215,969	\$175,804	2943	13.08	385	938	1076
39	049	0064.30	Upper	No	157.63	\$103,300	\$162,832	\$132,554	4946	17.65	873	1167	1851

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39	049	0065.00	Upper	No	235.56	\$103,300	\$243,333	\$198,080	3827	8.49	325	1071	1133
39	049	0066.00	Upper	No	256.22	\$103,300	\$264,675	\$215,455	4204	10.11	425	1109	1446
39	049	0067.10	Upper	No	135.27	\$103,300	\$139,734	\$113,750	2894	14.31	414	764	1121
39	049	0067.21	Upper	No	197.00	\$103,300	\$203,501	\$165,655	3763	9.04	340	1341	1437
39	049	0067.22	Middle	No	99.46	\$103,300	\$102,742	\$83,640	2953	18.59	549	747	905
39	049	0068.10	Upper	No	130.95	\$103,300	\$135,271	\$110,114	2354	10.32	243	839	1023
39	049	0068.21	Moderate	No	60.83	\$103,300	\$62,837	\$51,158	3619	30.56	1106	491	920
39	049	0068.22	Middle	No	114.46	\$103,300	\$118,237	\$96,250	1907	12.74	243	756	992
39	049	0069.10	Upper	No	198.20	\$103,300	\$204,741	\$166,667	1698	9.36	159	588	642
39	049	0069.21	Moderate	No	65.27	\$103,300	\$67,424	\$54,886	3861	47.86	1848	669	963
39	049	0069.23	Middle	No	81.81	\$103,300	\$84,510	\$68,798	3957	56.41	2232	1238	1542
39	049	0069.24	Moderate	No	65.11	\$103,300	\$67,259	\$54,750	4245	63.02	2675	675	1054
39	049	0069.31	Moderate	No	56.03	\$103,300	\$57,879	\$47,121	6882	74.83	5150	927	1904
39	049	0069.32	Moderate	No	68.57	\$103,300	\$70,833	\$57,665	7121	74.32	5292	1445	2231
39	049	0069.33	Low	No	35.57	\$103,300	\$36,744	\$29,911	7124	89.15	6351	385	1008
39	049	0069.43	Moderate	No	54.55	\$103,300	\$56,350	\$45,878	4677	56.68	2651	1226	1846
39	049	0069.44	Middle	No	89.06	\$103,300	\$91,999	\$74,893	4332	42.54	1843	1436	1908
39	049	0069.45	Low	No	46.85	\$103,300	\$48,396	\$39,397	6102	77.42	4724	325	1414
39	049	0069.50	Upper	No	145.12	\$103,300	\$149,909	\$122,031	2797	8.58	240	1118	1289
39	049	0069.91	Upper	No	155.74	\$103,300	\$160,879	\$130,959	4576	17.00	778	1661	1590
39	049	0069.92	Moderate	No	51.73	\$103,300	\$53,437	\$43,500	4443	77.34	3436	169	717
39	049	0070.10	Middle	No	103.48	\$103,300	\$106,895	\$87,017	3995	29.04	1160	680	1042
39	049	0070.20	Middle	No	109.34	\$103,300	\$112,948	\$91,947	6547	13.33	873	2165	2926
39	049	0070.41	Middle	No	104.86	\$103,300	\$108,320	\$88,182	2744	25.51	700	497	570
39	049	0070.43	Middle	No	104.49	\$103,300	\$107,938	\$87,866	5558	41.04	2281	640	1037
39	049	0070.44	Upper	No	121.92	\$103,300	\$125,943	\$102,521	5888	39.83	2345	835	1543
39	049	0070.47	Middle	No	102.20	\$103,300	\$105,573	\$85,946	3760	35.48	1334	815	1237
39	049	0070.48	Upper	No	128.47	\$103,300	\$132,710	\$108,036	6388	39.25	2507	1725	2085

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39	049	0071.01	Moderate	No	76.50	\$103,300	\$79,025	\$64,330	3239	27.69	897	867	1187
39	049	0071.02	Upper	No	162.32	\$103,300	\$167,677	\$136,500	3392	14.00	475	1157	1176
39	049	0071.03	Middle	No	102.50	\$103,300	\$105,883	\$86,193	3286	36.31	1193	1004	1239
39	049	0071.12	Middle	No	80.25	\$103,300	\$82,898	\$67,482	6625	63.97	4238	1495	1936
39	049	0071.13	Moderate	No	69.29	\$103,300	\$71,577	\$58,265	5194	61.65	3202	1098	1627
39	049	0071.14	Middle	No	92.92	\$103,300	\$95,986	\$78,137	5130	50.97	2615	990	1503
39	049	0071.15	Moderate	No	64.02	\$103,300	\$66,133	\$53,839	6053	66.56	4029	672	1180
39	049	0071.20	Middle	No	101.20	\$103,300	\$104,540	\$85,104	5451	30.43	1659	1275	1612
39	049	0071.93	Upper	No	138.90	\$103,300	\$143,484	\$116,806	6563	11.84	777	2379	2427
39	049	0071.98	Upper	No	129.23	\$103,300	\$133,495	\$108,667	2875	29.39	845	730	845
39	049	0071.99	Middle	No	84.43	\$103,300	\$87,216	\$71,001	6263	49.64	3109	1595	2140
39	049	0072.02	Middle	No	119.03	\$103,300	\$122,958	\$100,091	3645	54.76	1996	639	853
39	049	0072.05	Upper	No	120.64	\$103,300	\$124,621	\$101,447	6540	25.55	1671	1269	1789
39	049	0072.09	Upper	No	127.11	\$103,300	\$131,305	\$106,892	9770	38.09	3721	1788	2248
39	049	0072.11	Upper	No	296.00	\$103,300	\$305,768	\$248,906	4549	19.63	893	1187	1333
39	049	0072.12	Upper	No	257.66	\$103,300	\$266,163	\$216,667	5388	22.64	1220	1156	1411
39	049	0072.13	Upper	No	194.24	\$103,300	\$200,650	\$163,333	5398	24.51	1323	1648	1949
39	049	0072.14	Middle	No	105.11	\$103,300	\$108,579	\$88,393	3877	30.72	1191	653	869
39	049	0072.15	Middle	No	115.81	\$103,300	\$119,632	\$97,388	5550	24.74	1373	2024	2420
39	049	0073.01	Middle	No	113.74	\$103,300	\$117,493	\$95,645	5986	55.36	3314	1501	1858
39	049	0073.02	Middle	No	95.02	\$103,300	\$98,156	\$79,901	4862	48.33	2350	1585	1443
39	049	0073.03	Upper	No	127.45	\$103,300	\$131,656	\$107,177	6632	42.28	2804	1442	2009
39	049	0073.05	Upper	No	130.87	\$103,300	\$135,189	\$110,046	4480	25.27	1132	1709	1926
39	049	0073.06	Upper	No	193.24	\$103,300	\$199,617	\$162,500	4526	17.87	809	1466	1466
39	049	0073.94	Upper	No	198.13	\$103,300	\$204,668	\$166,607	3499	19.18	671	928	1018
39	049	0073.97	Middle	No	99.55	\$103,300	\$102,835	\$83,711	3537	64.43	2279	560	732
39	049	0073.98	Middle	No	111.01	\$103,300	\$114,673	\$93,353	8249	53.62	4423	2241	2342
39	049	0074.24	Middle	No	84.49	\$103,300	\$87,278	\$71,054	6240	41.51	2590	1619	2090
39	049	0074.25	Middle	No	102.34	\$103,300	\$105,717	\$86,061	2712	23.71	643	671	986

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39	049	0074.26	Middle	No	109.58	\$103,300	\$113,196	\$92,151	3357	20.49	688	1053	1303
39	049	0074.27	Upper	No	120.40	\$103,300	\$124,373	\$101,250	6714	31.34	2104	1379	1742
39	049	0074.92	Upper	No	157.51	\$103,300	\$162,708	\$132,450	6421	29.39	1887	1570	2099
39	049	0074.94	Upper	No	120.88	\$103,300	\$124,869	\$101,650	4404	35.22	1551	1160	1400
39	049	0075.11	Moderate	No	59.71	\$103,300	\$61,680	\$50,217	1872	93.70	1754	322	720
39	049	0075.12	Moderate	No	60.92	\$103,300	\$62,930	\$51,229	4295	91.06	3911	945	1800
39	049	0075.20	Low	No	37.75	\$103,300	\$38,996	\$31,750	3242	82.67	2680	517	1251
39	049	0075.31	Moderate	No	51.60	\$103,300	\$53,303	\$43,393	3065	80.78	2476	327	462
39	049	0075.32	Low	No	46.16	\$103,300	\$47,683	\$38,817	2633	92.71	2441	150	316
39	049	0075.33	Low	No	44.17	\$103,300	\$45,628	\$37,150	1933	89.76	1735	458	619
39	049	0075.34	Moderate	No	52.33	\$103,300	\$54,057	\$44,005	3884	89.75	3486	504	980
39	049	0075.50	Moderate	No	78.37	\$103,300	\$80,956	\$65,901	2983	70.00	2088	724	948
39	049	0075.52	Moderate	No	60.18	\$103,300	\$62,166	\$50,607	3998	93.47	3737	756	910
39	049	0075.53	Moderate	No	51.21	\$103,300	\$52,900	\$43,068	5731	86.53	4959	394	835
39	049	0077.10	Low	No	40.63	\$103,300	\$41,971	\$34,167	4629	64.14	2969	881	1803
39	049	0077.21	Low	No	44.24	\$103,300	\$45,700	\$37,206	6485	81.74	5301	467	757
39	049	0077.22	Moderate	No	53.32	\$103,300	\$55,080	\$44,837	3673	57.20	2101	871	1341
39	049	0077.30	Moderate	No	64.06	\$103,300	\$66,174	\$53,875	3221	50.42	1624	873	1353
39	049	0077.40	Middle	No	99.59	\$103,300	\$102,876	\$83,750	1743	28.97	505	654	587
39	049	0078.11	Middle	No	117.34	\$103,300	\$121,212	\$98,676	3621	17.76	643	1190	1504
39	049	0078.12	Moderate	No	79.77	\$103,300	\$82,402	\$67,083	4931	28.88	1424	757	1146
39	049	0078.20	Low	No	48.28	\$103,300	\$49,873	\$40,598	3784	47.38	1793	26	335
39	049	0078.30	Middle	No	119.57	\$103,300	\$123,516	\$100,550	3691	33.19	1225	468	748
39	049	0079.22	Upper	No	139.40	\$103,300	\$144,000	\$117,222	6201	18.19	1128	1392	2034
39	049	0079.31	Middle	No	115.56	\$103,300	\$119,373	\$97,177	4305	18.35	790	1365	1779
39	049	0079.41	Upper	No	136.62	\$103,300	\$141,128	\$114,886	3258	24.40	795	812	934
39	049	0079.55	Middle	No	114.56	\$103,300	\$118,340	\$96,335	3364	18.07	608	1054	1131
39	049	0079.56	Upper	No	124.09	\$103,300	\$128,185	\$104,353	4747	23.36	1109	1596	1679

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39	049	0079.57	Middle	No	99.51	\$103,300	\$102,794	\$83,682	4940	14.23	703	1429	1962
39	049	0079.58	Upper	No	165.79	\$103,300	\$171,261	\$139,417	3330	11.86	395	1199	1343
39	049	0079.59	Middle	No	101.50	\$103,300	\$104,850	\$85,353	1962	24.06	472	481	490
39	049	0079.60	Middle	No	100.03	\$103,300	\$103,331	\$84,116	4926	30.19	1487	1306	1695
39	049	0079.61	Upper	No	156.24	\$103,300	\$161,396	\$131,387	4974	20.37	1013	1396	1425
39	049	0079.62	Middle	No	105.61	\$103,300	\$109,095	\$88,810	5249	20.84	1094	1499	1973
39	049	0079.63	Upper	No	147.80	\$103,300	\$152,677	\$124,290	3065	13.08	401	1355	1515
39	049	0079.64	Upper	No	132.70	\$103,300	\$137,079	\$111,591	6496	21.06	1368	1357	1732
39	049	0079.65	Middle	No	100.12	\$103,300	\$103,424	\$84,196	3863	35.54	1373	729	945
39	049	0079.66	Moderate	No	71.38	\$103,300	\$73,736	\$60,030	5332	41.49	2212	843	1211
39	049	0080.01	Upper	No	181.72	\$103,300	\$187,717	\$152,813	3350	13.64	457	700	753
39	049	0080.02	Upper	No	134.53	\$103,300	\$138,969	\$113,125	3487	15.80	551	1263	1311
39	049	0081.10	Middle	No	84.82	\$103,300	\$87,619	\$71,331	4245	30.13	1279	1044	1358
39	049	0081.20	Low	No	49.11	\$103,300	\$50,731	\$41,300	4101	44.87	1840	994	1419
39	049	0081.32	Middle	No	80.37	\$103,300	\$83,022	\$67,582	7202	36.92	2659	1482	2054
39	049	0081.63	Low	No	41.06	\$103,300	\$42,415	\$34,529	3622	58.45	2117	381	779
39	049	0081.64	Moderate	No	67.72	\$103,300	\$69,955	\$56,947	4573	47.47	2171	757	1423
39	049	0081.65	Moderate	No	61.73	\$103,300	\$63,767	\$51,915	2544	27.59	702	458	693
39	049	0081.66	Upper	No	150.81	\$103,300	\$155,787	\$126,821	5601	28.87	1617	1619	1753
39	049	0081.67	Middle	No	107.42	\$103,300	\$110,965	\$90,330	4078	41.07	1675	722	898
39	049	0081.68	Middle	No	84.69	\$103,300	\$87,485	\$71,222	3517	41.77	1469	757	1293
39	049	0081.69	Moderate	No	50.29	\$103,300	\$51,950	\$42,292	5235	39.83	2085	954	1503
39	049	0081.70	Middle	No	99.41	\$103,300	\$102,691	\$83,600	5083	24.45	1243	1548	1736
39	049	0081.71	Low	No	44.38	\$103,300	\$45,845	\$37,326	3505	40.23	1410	339	529
39	049	0081.72	Middle	No	98.25	\$103,300	\$101,492	\$82,618	5597	36.09	2020	1010	1188
39	049	0082.10	Moderate	No	56.33	\$103,300	\$58,189	\$47,375	2321	48.69	1130	450	864
39	049	0082.30	Low	No	37.37	\$103,300	\$38,603	\$31,429	3178	88.07	2799	0	171
39	049	0082.41	Low	No	38.24	\$103,300	\$39,502	\$32,159	2559	45.53	1165	362	741
39	049	0082.42	Middle	No	80.98	\$103,300	\$83,652	\$68,102	6316	31.71	2003	1555	2098

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39	049	0083.11	Moderate	No	67.41	\$103,300	\$69,635	\$56,688	4686	49.98	2342	692	1155
39	049	0083.12	Moderate	No	54.53	\$103,300	\$56,329	\$45,859	5027	57.87	2909	507	1286
39	049	0083.21	Moderate	No	60.30	\$103,300	\$62,290	\$50,707	2530	33.60	850	738	1109
39	049	0083.22	Moderate	No	65.43	\$103,300	\$67,589	\$55,025	4837	33.06	1599	1000	1835
39	049	0083.30	Moderate	No	55.57	\$103,300	\$57,404	\$46,736	1847	23.88	441	321	676
39	049	0083.40	Middle	No	80.93	\$103,300	\$83,601	\$68,053	6354	40.02	2543	1062	1635
39	049	0083.50	Middle	No	86.32	\$103,300	\$89,169	\$72,585	7668	64.57	4951	1430	1998
39	049	0083.60	Middle	No	90.85	\$103,300	\$93,848	\$76,395	6690	33.36	2232	1971	2496
39	049	0083.80	Middle	No	97.04	\$103,300	\$100,242	\$81,607	5128	31.88	1635	1153	1498
39	049	0083.81	Middle	No	95.25	\$103,300	\$98,393	\$80,101	4426	19.00	841	1339	1689
39	049	0083.82	Middle	No	104.50	\$103,300	\$107,949	\$87,877	3715	25.36	942	882	1098
39	049	0084.00	Upper	No	239.33	\$103,300	\$247,228	\$201,250	3161	9.05	286	1420	1347
39	049	0085.00	Upper	No	165.68	\$103,300	\$171,147	\$139,318	5702	13.07	745	991	1873
39	049	0087.10	Moderate	No	51.69	\$103,300	\$53,396	\$43,469	2593	85.69	2222	785	1238
39	049	0087.20	Moderate	No	64.40	\$103,300	\$66,525	\$54,157	3507	71.14	2495	957	1761
39	049	0087.30	Low	No	35.72	\$103,300	\$36,899	\$30,043	1987	77.86	1547	199	450
39	049	0088.11	Moderate	No	51.00	\$103,300	\$52,683	\$42,885	1774	27.68	491	652	899
39	049	0088.12	Middle	No	82.25	\$103,300	\$84,964	\$69,167	3393	75.83	2573	834	1294
39	049	0088.13	Moderate	No	52.78	\$103,300	\$54,522	\$44,385	2447	82.80	2026	583	1014
39	049	0088.21	Low	No	45.86	\$103,300	\$47,373	\$38,571	2597	15.02	390	790	1031
39	049	0088.22	Moderate	No	78.89	\$103,300	\$81,493	\$66,339	4134	38.58	1595	868	1430
39	049	0088.25	Middle	No	88.73	\$103,300	\$91,658	\$74,612	6468	21.82	1411	1626	2461
39	049	0089.00	Upper	No	121.72	\$103,300	\$125,737	\$102,353	5240	19.03	997	1032	1547
39	049	0090.00	Upper	No	225.29	\$103,300	\$232,725	\$189,444	3644	14.85	541	984	1087
39	049	0091.00	Upper	No	212.91	\$103,300	\$219,936	\$179,038	5044	15.38	776	1574	1743
39	049	0092.20	Low	No	42.61	\$103,300	\$44,016	\$35,833	2613	50.13	1310	425	839
39	049	0092.30	Moderate	No	54.63	\$103,300	\$56,433	\$45,938	5631	65.67	3698	588	1652
39	049	0092.40	Moderate	No	74.02	\$103,300	\$76,463	\$62,250	2052	40.20	825	461	753

\* Will automatically be included in the 2025 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	049	0092.50	Moderate	No	60.94	\$103,300	\$62,951	\$51,250	2103	52.64	1107	530	826
39	049	0092.51	Moderate	No	57.15	\$103,300	\$59,036	\$48,060	1169	83.66	978	27	658
39	049	0092.52	Moderate	No	69.09	\$103,300	\$71,370	\$58,099	2927	71.88	2104	63	1029
39	049	0093.11	Low	No	49.89	\$103,300	\$51,536	\$41,957	3325	76.36	2539	653	1090
39	049	0093.12	Moderate	No	60.16	\$103,300	\$62,145	\$50,590	3552	77.62	2757	380	1102
39	049	0093.21	Low	No	44.29	\$103,300	\$45,752	\$37,250	2457	77.94	1915	607	979
39	049	0093.22	Moderate	No	57.88	\$103,300	\$59,790	\$48,676	3751	74.86	2808	984	1567
39	049	0093.23	Moderate	No	52.40	\$103,300	\$54,129	\$44,063	3828	84.95	3252	488	1270
39	049	0093.25	Low	No	42.24	\$103,300	\$43,634	\$35,527	4746	86.68	4114	305	1057
39	049	0093.26	Low	No	34.27	\$103,300	\$35,401	\$28,825	1686	88.67	1495	0	418
39	049	0093.32	Middle	No	98.91	\$103,300	\$102,174	\$83,179	3321	81.27	2699	1004	1569
39	049	0093.34	Moderate	No	50.65	\$103,300	\$52,321	\$42,596	3160	87.31	2759	609	1130
39	049	0093.36	Moderate	No	59.13	\$103,300	\$61,081	\$49,722	2085	63.36	1321	125	688
39	049	0093.37	Moderate	No	52.73	\$103,300	\$54,470	\$44,340	4416	89.70	3961	545	1274
39	049	0093.40	Moderate	No	51.10	\$103,300	\$52,786	\$42,969	3513	68.72	2414	277	658
39	049	0093.50	Middle	No	87.56	\$103,300	\$90,449	\$73,631	3046	70.78	2156	487	697
39	049	0093.61	Middle	No	107.70	\$103,300	\$111,254	\$90,567	5429	54.10	2937	1584	1961
39	049	0093.72	Moderate	No	63.01	\$103,300	\$65,089	\$52,987	4613	74.77	3449	1054	1893
39	049	0093.73	Moderate	No	71.01	\$103,300	\$73,353	\$59,715	6184	78.61	4861	1315	1925
39	049	0093.81	Middle	No	98.00	\$103,300	\$101,234	\$82,407	6424	56.71	3643	1027	1428
39	049	0093.82	Moderate	No	72.06	\$103,300	\$74,438	\$60,595	3002	31.28	939	783	1348
39	049	0093.83	Middle	No	84.47	\$103,300	\$87,258	\$71,036	2636	44.01	1160	469	785
39	049	0093.84	Moderate	No	67.58	\$103,300	\$69,810	\$56,833	2916	47.15	1375	524	774
39	049	0093.85	Middle	No	109.08	\$103,300	\$112,680	\$91,731	3907	39.44	1541	820	1096
39	049	0093.86	Moderate	No	51.46	\$103,300	\$53,158	\$43,274	3279	79.05	2592	232	889
39	049	0093.90	Middle	No	117.14	\$103,300	\$121,006	\$98,508	7155	51.68	3698	2085	2280
39	049	0093.91	Middle	No	81.89	\$103,300	\$84,592	\$68,864	5068	66.77	3384	1015	1745
39	049	0093.92	Moderate	No	72.69	\$103,300	\$75,089	\$61,127	3750	75.49	2831	514	749
39	049	0093.93	Moderate	No	74.98	\$103,300	\$77,454	\$63,056	3742	88.03	3294	490	1492

\* Will automatically be included in the 2025 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	049	0093.94	Middle	No	82.69	\$103,300	\$85,419	\$69,536	2014	36.59	737	660	847
39	049	0093.95	Middle	No	87.80	\$103,300	\$90,697	\$73,835	4895	42.76	2093	1801	2003
39	049	0093.96	Moderate	No	55.37	\$103,300	\$57,197	\$46,560	2825	84.32	2382	202	396
39	049	0093.97	Moderate	No	53.19	\$103,300	\$54,945	\$44,729	2977	69.84	2079	439	1249
39	049	0094.01	Middle	No	85.67	\$103,300	\$88,497	\$72,040	4626	50.24	2324	1255	1788
39	049	0094.03	Moderate	No	68.10	\$103,300	\$70,347	\$57,268	3629	56.93	2066	533	699
39	049	0094.04	Upper	No	138.56	\$103,300	\$143,132	\$116,515	2764	17.37	480	936	1207
39	049	0094.05	Upper	No	136.98	\$103,300	\$141,500	\$115,192	4143	17.76	736	1428	1506
39	049	0094.10	Moderate	No	79.26	\$103,300	\$81,876	\$66,656	2810	47.65	1339	873	1163
39	049	0094.20	Moderate	No	68.97	\$103,300	\$71,246	\$58,000	6093	46.17	2813	1216	1904
39	049	0094.40	Middle	No	94.66	\$103,300	\$97,784	\$79,599	5054	29.26	1479	1109	1545
39	049	0094.95	Middle	No	84.21	\$103,300	\$86,989	\$70,817	5258	42.16	2217	1098	1830
39	049	0094.97	Upper	No	126.08	\$103,300	\$130,241	\$106,023	2000	14.35	287	639	726
39	049	0094.98	Middle	No	88.13	\$103,300	\$91,038	\$74,111	3827	62.40	2388	633	809
39	049	0095.20	Middle	No	86.99	\$103,300	\$89,861	\$73,152	4614	20.78	959	1422	1891
39	049	0095.90	Middle	No	81.54	\$103,300	\$84,231	\$68,571	5323	16.51	879	1694	2013
39	049	0096.00	Moderate	No	62.20	\$103,300	\$64,253	\$52,306	4250	27.04	1149	986	1655
39	049	0097.11	Moderate	No	68.76	\$103,300	\$71,029	\$57,823	4436	15.62	693	1051	1620
39	049	0097.12	Middle	No	86.64	\$103,300	\$89,499	\$72,856	2593	11.26	292	773	1097
39	049	0097.51	Upper	No	145.38	\$103,300	\$150,178	\$122,250	6537	12.21	798	1922	2165
39	049	0097.52	Middle	No	116.26	\$103,300	\$120,097	\$97,765	7528	22.53	1696	2165	2489
39	049	0097.53	Upper	No	149.75	\$103,300	\$154,692	\$125,923	5947	9.25	550	2331	2454
39	049	0097.54	Middle	No	111.69	\$103,300	\$115,376	\$93,920	3989	12.06	481	853	1068
39	049	0097.55	Upper	No	135.37	\$103,300	\$139,837	\$113,835	7213	15.56	1122	2192	2910
39	049	0097.56	Middle	No	81.53	\$103,300	\$84,220	\$68,564	2244	22.19	498	508	692
39	049	0097.57	Middle	No	107.82	\$103,300	\$111,378	\$90,669	4669	14.86	694	1369	1723
39	049	0098.01	Upper	No	132.75	\$103,300	\$137,131	\$111,635	3288	10.01	329	1156	1314
39	049	0098.02	Middle	No	85.24	\$103,300	\$88,053	\$71,684	3521	8.58	302	1229	1481

\* Will automatically be included in the 2025 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	049	0099.00	Low	No	36.11	\$103,300	\$37,302	\$30,372	1970	75.84	1494	0	80
39	049	0100.00	Middle	No	98.45	\$103,300	\$101,699	\$82,788	5858	30.54	1789	1026	1567
39	049	0101.00	Middle	No	115.35	\$103,300	\$119,157	\$97,000	1487	57.16	850	256	259
39	049	0102.01	Moderate	No	57.81	\$103,300	\$59,718	\$48,615	4049	55.17	2234	575	1791
39	049	0102.02	Moderate	No	77.59	\$103,300	\$80,150	\$65,246	5534	50.04	2769	1189	1310
39	049	0102.03	Middle	No	80.84	\$103,300	\$83,508	\$67,980	4486	57.82	2594	507	1142
39	049	0102.04	Moderate	No	74.65	\$103,300	\$77,113	\$62,778	6684	65.02	4346	799	1426
39	049	0103.00	Moderate	No	50.54	\$103,300	\$52,208	\$42,500	2665	34.93	931	119	596
39	049	0104.01	Upper	No	260.02	\$103,300	\$268,601	\$218,650	2641	33.89	895	704	791
39	049	0104.02	Upper	No	192.16	\$103,300	\$198,501	\$161,585	5411	30.92	1673	1407	1688
39	049	0105.01	Upper	No	147.33	\$103,300	\$152,192	\$123,895	5037	30.49	1536	1213	1613
39	049	0105.02	Upper	No	209.08	\$103,300	\$215,980	\$175,814	3411	25.65	875	937	1220
39	049	0106.01	Upper	No	152.42	\$103,300	\$157,450	\$128,175	5364	24.14	1295	1480	1738
39	049	0106.02	Upper	No	164.74	\$103,300	\$170,176	\$138,527	7124	21.15	1507	1762	1990
39	049	0107.00	Moderate	No	67.04	\$103,300	\$69,252	\$56,375	1420	27.46	390	136	389
39	049	0109.00	Middle	No	111.46	\$103,300	\$115,138	\$93,730	4983	42.77	2131	1032	1383
39	049	9800.00	Unknown	No	0.00	\$103,300	\$0	\$0	5	60.00	3	0	0

\* Will automatically be included in the 2025 Distressed or Underserved Tract List

## **Section 7**

# **Branch Offices and Hours of Operation**

United Midwest Saving Bank  
Branch Office Facilities

United Midwest Savings Bank  
101 South Main Street  
DeGraff, OH 43118  
(Logan County OH)

United Midwest Savings Bank  
4848 Reed Rd  
Columbus, OH 43220  
(Franklin County OH)

United Midwest Savings Bank  
3011 Broad Street  
Columbus, OH 43209  
(Franklin County OH)

United Midwest Savings Bank  
547 High Street  
Worthington, OH 43085  
(Franklin County OH)

United Midwest Savings Bank  
780 S. State Street  
Westerville, OH 43081  
(Franklin County OH)

United Midwest Savings Bank  
101 North Main Street  
West Manchester, OH 45382  
(Preble County OH)

## United Midwest Savings Bank Branch office hours of operation

### DeGraff Branch

101 South Main Street, DeGraff, OH 43118

Monday-Friday:

8:30-5:00 pm (Drive-thru)

9:00-5:00 (Lobby)

Saturday:

8:30-12:00 pm (Drive-thru)

9:00-12:00 (Lobby)

### Columbus Branch

4848 Reed Rd. Columbus OH 43220

Monday-Friday:

8:30-5:00 pm (Drive-thru)

9:00-5:00 (Lobby)

Saturday:

8:30-12:00 pm (Drive-thru)

9:00-12:00 (Lobby)

### Columbus Branch

3011 Broad Street, Columbus, OH 43229

Monday-Friday:

8:30-5:00 pm (Drive-thru)

9:00-5:00 (Lobby)

Saturday:

8:30-12:00 pm (Drive-thru)

9:00-12:00 (Lobby)

### Worthington Branch

547 High Street, Worthington, OH 43085

Monday-Friday:

8:30-5:00 pm (Drive-thru)

9:00-5:00 (Lobby)

(No Saturday Hours)

### Westerville Branch

780 S. State Street, Westerville, OH 43081

4848 Reed Rd. Columbus OH 43220

Monday-Friday:

8:30-5:00 pm (Drive-thru)

9:00-5:00 (Lobby)

Saturday:

8:30-12:00 pm (Drive-thru)

9:00-12:00 (Lobby)

### West Manchester Branch

101 N. Main Street, West Manchester, OH 45382

Monday-Friday:

9:00-5:00 (Lobby)

Saturday:

9:00-12:00 (Lobby)

## **Section 8**

# **Branch Openings and Closings**



**United Midwest Savings Bank  
Branch Openings and Closings**

June 11, 2024

Opened

547 N. High Street  
Worthington, Ohio 43085  
(Franklin County)

The bank has not had any branch closings in the current or prior two calendar years.

## Section 9

# Loan-to-Deposit Ratio

## United Midwest Savings Bank

### Loans to Deposit Ratio

*(balances in thousands)*

	<u>03/31/24</u>	<u>06/30/24</u>	<u>09/30/24</u>	<u>12/31/24</u>
<b>Total Loans</b>	\$ 316,416	\$ 304,627	\$ 303,290	\$ 305,662
<b>Total Deposits</b>	\$ 402,714	\$ 403,258	\$ 409,891	\$ 404,163
<b>LTD Ratio</b>	78.57%	75.54%	73.99%	75.63%

## **Section 10**

# **Products and Services**

**Columbus Area Offices:**

4848 Reed Road  
Columbus, Ohio 43220  
614.538.9400  
800.228.8620

3011 East Broad Street  
Columbus, Ohio 43209  
614.955.7400  
800.228.8620

780 S. State Street  
Westerville, Ohio 43081  
614.948.0100  
800.228.8620

547 High Street  
Worthington, Ohio 43085  
614.948.4399  
800.228.8620

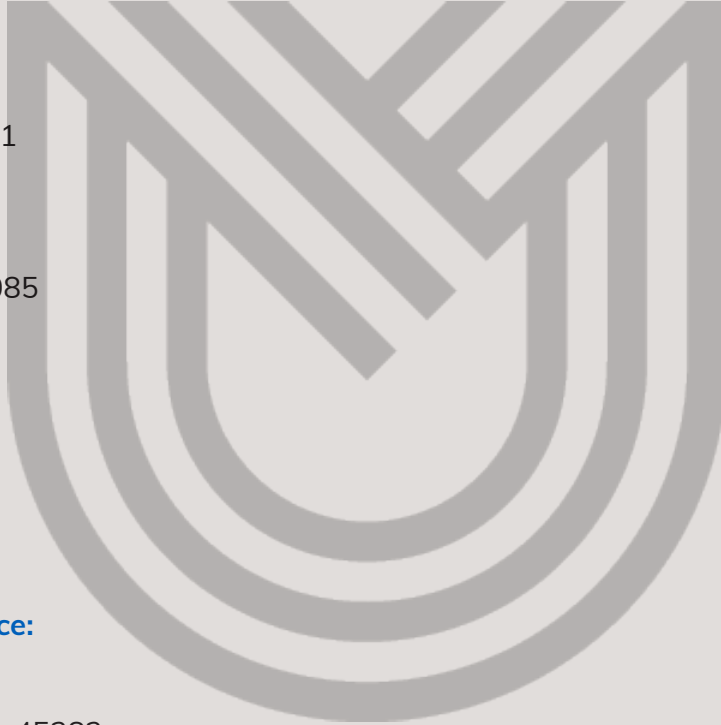
**DeGraff Office:**

101 South Main Street  
PO Box 123  
DeGraff, Ohio 43318  
937.585.5861  
800.626.2913

**West Manchester Office:**

101 North Main Street  
PO Box 201  
West Manchester, Ohio 45382  
937.678.6951  
800.228.8620

# Depository Fee Schedule



Fees apply to all deposit account products, except where noted. Other fees may apply and are explained in account disclosures. Changes to accounts, rates, terms and fees may occur at any time. You may obtain a replacement copy of any account agreement, disclosure, rate sheet or fee schedule at any time from your local branch. We reserve the right to refuse copying requests at any time and for any reason. Please call us or stop in and ask us for the most recent information.



**United Midwest<sup>®</sup>**  
Savings Bank



## FEE SCHEDULE

Account Activity Printout \$ 3.00/page  
Statement Copy \$ 3.00/stmt

Photocopies \$ 0.50/page  
No copies of checks for cashing or depositing.

Account Research \$25.00/hour  
Minimum charge of \$6.25

Garnishment or Levy \$50.00

Check Orders \$ Varies  
Price based on quantity, style and shipping.

Counter Checks &/or Deposit Slips \$ 1.00/sheet

Cashier's Check \$ 5.00  
Customers only. First check each month is free.

Incoming Wire Transfer \$15.00

Outgoing Wire Transfer \$30.00

Overnight Mail Requests \$30.00  
1 to 2 Days

Priority Mail Requests \$ 9.25  
2 to 3 days

Overdraft Fee \$25.00/item

Return Item Fee \$25.00/item  
Combined Overdraft and Returned Fees incurred on the same date will not exceed the total of 4 fees or \$100. Overdraft Fee applies to overdrafts created by checks, in-person withdrawals, recurring card withdrawals, or other electronic means.

Returned Deposit Item \$10.00/item  
Fee is applied for each returned item cashed or deposited.

Stop Payment Fee \$30.00

Early Closing Fee \$30.00/acct.  
Fee may be applied if account is within 180 days of the opening date. Does not apply to CDs, IRAs or Money Market accounts.

Replace Lost or Damaged ATM Card or Debit MasterCard® \$ 5.00/card  
One free replacement card per year per cardholder.

Overnight Shipping for Replacement Card \$20.00/card  
Fee is in addition to the Replace Lost or Damaged ATM Card or Debit MasterCard fee when applicable.

*Please feel free to contact your banking office, our website or our toll free numbers if you have any questions or need more information about an account.*





Corporate Office:  
955 County Line Road West  
Westerville, Ohio 43082  
[www.umwsb.com](http://www.umwsb.com)



Account rates, terms and details are subject to change at any time. Penalty for early withdrawal from CDs and IRAs. All loans are subject to credit review, underwriting guidelines, verification of identity, and approval. Fees may apply and may affect APR. Please refer to disclosures for details. You may obtain a copy of any account agreement, disclosure, rate sheet or fee schedule from our banking offices. Please call us or stop in and ask us for the most recent information. NMLS# 516627





United Midwest  
Savings Bank

# We Are United Midwest

Partners with purpose







# Focused Financial Services

Since 1889, United Midwest has focused on exceeding the expectations of the communities and businesses we serve. We never forget that our business is people and our decisions are mindful of our responsibility to others. We focus our services into four main categories:

- » **Business Lending**
- » **Retail Lending**
- » **Residential Lending**
- » **Personal and Business Banking**

Each of our business pillars is unique, but we approach each with the same steadfast commitment to executional excellence. Behind every interaction we share, there is a person relying on our expertise and ability to deliver as promised. That's a responsibility we hold in the highest regard, and we measure our success by the quality of the relationships we develop and maintain.



# Answering the Call of Business



At United Midwest, we're specialists in Small Business Administration / United States Department of Agriculture (SBA/USDA) lending. We understand the nuances of SBA/USDA loans at any loan amount and for any purpose. Our lenders and underwriters have a deep history in the industry and provide an exceptional level of expertise to our partners and borrowers.

We've created a loan experience that removes confusion and focuses on results. For businesses seeking a loan up to \$150,000, we've created an easy, online application to begin the process. These loans can be used for a variety of purposes and industries.

For businesses with borrowing needs up to \$8 million, our team of knowledgeable and responsive lenders are available to help guide borrowers through the entire application process. Should questions arise at any time, our lenders and underwriters are available to answer them in an understandable and timely manner. Business borrowers can be confident that their loan application is being managed with expertise and efficiency.

FOR MORE INFORMATION, PLEASE VISIT:

» [www.umwsb.com/business-lending](http://www.umwsb.com/business-lending)



# Purchasing Power Simplified

Our Retail Lending division works with merchants around the country to provide their customers with financing options for larger-ticket items, typically \$2,000 and up. Retailers can expand the purchasing power of their customers with fast and easy approval through our simple-to-use online portal. Consumers receive low fixed-rate financing, most of the time less than a standard credit card, with the convenience of online payments.

FOR MORE INFORMATION ON BECOMING  
A MERCHANT PARTNER OR FOR CUSTOMER  
LOGIN AND QUESTIONS,

VISIT US ONLINE:

» [www.umwsb.com/retail-lending](http://www.umwsb.com/retail-lending)

## ITEMS WE COMMONLY FINANCE:

- » **Pianos**
- » **Musical Instruments**
- » **Specialty Bikes and Sporting Goods**
- » **Safes and Security Equipment**
- » **Funeral Services / Caskets**
- » **Spas & Hot Tubs**
- » **Elective Health Services**
- » **Equestrian, Farm, and Western Products**

# Making A House Your Home

With so many loan options to choose from, buying or refinancing a home can be overwhelming. The solution: find the right lender who will explain the various loan options, secure the best terms, and guide you through the entire process. At United Midwest, we take the time to make sure that the financing we recommend best suits your needs.

TO LEARN MORE ABOUT OUR RESIDENTIAL MORTGAGE LOANS,

VISIT US ONLINE:

» [www.umwsb.com/residential-loans](http://www.umwsb.com/residential-loans)

OR STOP IN ONE OF OUR BANKING OFFICES.



## TYPES OF MORTGAGES WE OFFER:

- » **Conventional Home Loans**
- » **Customized Residential Home Loans**
- » **Lot Loans**
- » **Agricultural Land Loans**

DEPOSIT SERVICES

# Banking on a Great Return

United Midwest offers all the deposit services you've come to expect for you and for your business. We include all the latest technology such as online and mobile banking, and the personalized service community banks are known for.

Our specialty is Certificates of Deposit. Our very competitive rates and wide selection of terms provide our customers with solid earnings in a time frame of their choosing. Easy to open, no risk and guaranteed returns make CDs a great option.

TO LEARN MORE ABOUT OUR PERSONAL  
AND BUSINESS BANKING SERVICES,

VISIT US ONLINE:

» [www.umwsb.com/banking](http://www.umwsb.com/banking)

OR STOP IN ONE OF OUR BANKING OFFICES.



# United Midwest Savings Bank

## Columbus, Ohio

4848 Reed Road  
Columbus, OH 43220  
614-538-9400  
614-538-0897 Fax

3011 E. Broad Street  
Columbus, OH 43209  
614-955-7400  
614-235-9306 Fax

780 S. State Street  
Westerville, OH 43081  
614-948-0100  
614-899-0988 Fax

547 High Street  
Worthington, OH 43085  
614-948-4399  
614-453-0628 Fax

## DeGraff, Ohio

101 S. Main Street  
DeGraff, OH 43318  
937-585-5861  
937-585-6603 Fax

## West Manchester, Ohio

101 N. Main Street  
West Manchester, OH 45382  
937-678-6951  
937-678-7105 Fax

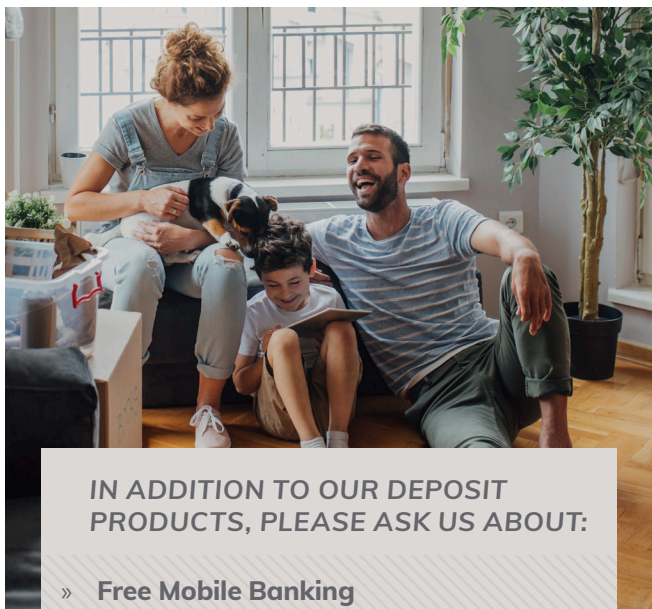
## Lending

Retail Loans: 800-468-2255

SBA (Under \$150,000) 844-531-9722

SBA (Over \$150,000) 877-751-4622





**IN ADDITION TO OUR DEPOSIT PRODUCTS, PLEASE ASK US ABOUT:**

- » **Free Mobile Banking**
  - Mobile Deposit
- » **Our UMWSB Debit MasterCard® with:**
  - Fraud Detection
  - Zero Liability Protection
  - MasterCard SecureCode
  - CardValet mobile app for debit cards
- » **Free Online Banking and Bill Pay**
- » **Balance Protection Program:**
  - Link your savings to your checking to help prevent overdrafts, returned checks or incomplete electronic payments
- » **Automatic Transfers:**
  - To savings or loan payments
  - Control with online banking
- » **Statement Options**
  - Choice of an eStatement or a mailed printed statement
  - Combined statements

[www.umwsb.com](http://www.umwsb.com)



To learn more about our personal and business banking services, visit [www.umwsb.com/banking](http://www.umwsb.com/banking) or stop in to one of our banking offices.

## UNITED MIDWEST SAVINGS BANK

### Columbus, Ohio area banking offices:

4848 Reed Road  
Columbus, OH 43220  
614-538-9400  
614-538-0897 Fax

3011 E. Broad Street  
Columbus, OH 43209  
614-955-7400  
614-235-9306 Fax

780 S. State Street  
Westerville, OH 43081  
614-948-0100  
614-899-0988 Fax

547 High Street  
Worthington, OH 43085  
614-948-4399  
614-453-0628 Fax

### Additional Ohio banking offices:

#### DeGraff, Ohio

101 S. Main Street  
DeGraff, OH 43318  
937-585-5861  
937-585-6603 Fax

#### West Manchester, Ohio

101 N. Main Street  
West Manchester, OH 45382  
937-678-6951  
937-678-7105 Fax



For CDs and IRAs: APY (Annual Percentage Yield) assumes the principal and interest remain on deposit for entire year. Withdrawals/interest payments will reduce earnings on account. CDs/IRAs require a minimum balance of \$500 to earn APY and there is a penalty for early withdrawal of principal. For checking accounts: Early Closing Fee applied if account is closed prior to 180 days of opening date. Changes to accounts, rates, terms and fees may occur. Fees may apply to deposit accounts and are explained in account disclosures. You may obtain a copy of any account agreement, disclosure, rate sheet or fee schedule from our banking offices. Please call us or stop in and ask us for the most recent information.



Member  
**FDIC**

Deposit accounts are backed by the Federal Deposit Insurance Corporation. FDIC insurance covers depositors' accounts, including principal and accrued interest, up to the insurance limit. The standard deposit insurance amount is \$250,000 per depositor. For more information on calculating insurance coverage, visit the FDIC's Electronic Deposit Insurance Estimator (EDIE) at [www.FDIC.gov/EDIE](http://www.FDIC.gov/EDIE).





**United Midwest**  
Savings Bank

**Deposit Services**

# Banking on a Great Return

Personal Deposit Services





United Midwest offers all the deposit services you've come to expect from your bank. We include all the latest technology such as online and mobile banking, and the personalized service community banks are known for.

Our specialty is our Certificates of Deposit. Easy to open, no risk, and guaranteed returns make CDs a great option for your savings.

Our customers return to United Midwest time and time again because our CD rates are among the most competitive in our markets, and our variety of terms allow you to choose how long you want your money to grow.



# Personal Savings & Checking



Product	Minimum to Open	Monthly Service Charge
Certificate of Deposit	\$500	No
Individual Retirement Account (IRA)	\$500	No
Money Market	\$1000	\$10 monthly <i>(No fee if a \$1,000 average monthly balance is maintained)</i>
Tiered Money Market	\$50,000	No
Statement Savings	\$5	No
Basic Checking	\$50	No
Interest Checking	\$1000	No

[www.umwsb.com](http://www.umwsb.com)





<b>Interest Earned</b>	<b>Minimum Balance to Earn Interest</b>	<b>Additional Features</b>
Yes	None	Interest can be compounded, mailed by check or automatically transferred to a UMWSB checking or savings or to another bank
Yes	None	Any CD can be opened as an IRA
Yes	\$1,000	Unlimited transactions.
Yes, tiered by balance*	None	Unlimited transactions.
Yes	None	Unlimited transactions.
No	None	Unlimited transactions
Yes	\$1,000	Unlimited transactions

\* Up to \$49,999.99  
\$50,000 - \$74,999.99  
\$75,000 - \$99,999.99  
\$100,000 - \$199,999.99  
\$200,000 and greater



To learn more about our personal and business banking services, visit [www.umwsb.com/banking](http://www.umwsb.com/banking) or stop in to one of our banking offices.

## UNITED MIDWEST SAVINGS BANK

### Columbus, Ohio area banking offices:

4848 Reed Road  
Columbus, OH 43220  
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614-538-0897 Fax

3011 E. Broad Street  
Columbus, OH 43209  
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614-235-9306 Fax

780 S. State Street  
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614-899-0988 Fax

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937-585-5861  
937-585-6603 Fax

#### West Manchester, Ohio

101 N. Main Street  
West Manchester, OH 45382  
937-678-6951  
937-678-7105 Fax



For CDs: APY (Annual Percentage Yield) assumes the principal and interest remain on deposit for entire year. Withdrawals/interest payments will reduce earnings on account. CDs require a minimum balance of \$500 to earn APY and there is a penalty for early withdrawal of principal. For checking accounts: Early Closing Fee applied if account is closed prior to 180 days of opening date. Changes to accounts, rates, terms and fees may occur. Fees may apply to deposit accounts and are explained in account disclosures. You may obtain a copy of any account agreement, disclosure, rate sheet or fee schedule from our banking offices. Please call us or stop in and ask us for the most recent information.



Deposit accounts are backed by the Federal Deposit Insurance Corporation. FDIC insurance covers depositors' accounts, including principal and accrued interest, up to the insurance limit. The standard deposit insurance amount is \$250,000 per depositor. For more information on calculating insurance coverage, visit the FDIC's Electronic Deposit Insurance Estimator (EDIE) at [www.FDIC.gov/EDIE](http://www.FDIC.gov/EDIE).



United Midwest  
Savings Bank

**Deposit Services**

# Business Banking Made Simple

Business Deposit Services



# Business Savings & Checking



Product	Minimum to Open	Monthly Service Charge
Business Basic Checking	\$500	No
Business Interest Checking	\$1,000	No
Business Money Market	\$10,000	\$10 monthly (No fee if a \$10,000 average monthly balance is maintained)
Business Statement Savings	\$500	No
Business Certificate of Deposit	\$500	No

**In addition to our services above, please ask us about:**

- » Free Online Banking and Bill Pay
- » Statement Options
  - Choice of an eStatement or a Mailed Printed Statement.
  - Check images can be included for \$5



United Midwest offers a selection of deposit services for your small business. Because we believe in keeping it simple, we made it easy for our small business customers to have an account without monthly fees and some that earn interest. All of our accounts include the exemplary service that community banks, such as United Midwest, are known for.

<b>Interest Earned</b>	<b>Minimum Balance</b>	<b>Additional Features</b>
No	None	200 Debit Check transactions free; \$.30 per additional item
Yes	\$1,000 balance to earn interest	200 Debit Check transactions free; \$.30 per additional item
Yes* (tiered by balance)	\$10,000 balance to earn interest	Unlimited transactions
Yes	None	Unlimited transactions
Yes	None	Interest can be compounded, mailed by check or automatically transferred to a UMWSB checking or savings or to another bank

\* Up to \$9,999.99  
 \$10,000.00 - \$49,999.99  
 \$50,000.00 - \$99,999.99  
 \$100,000.00 - \$199,999.99  
 \$200,000.00 and up

[www.umwsb.com](http://www.umwsb.com)







**United Midwest**  
Savings Bank

**Merchant Lending**

# More for Your Customer Means More for You

Fast and simple  
credit solutions





# Purchasing Power Simplified

Merchants around the country have discovered how United Midwest can give their customers more purchasing power for larger ticket items, typically \$2,000 and up. Our simple-to-use online portal delivers credit decisions in just a few minutes and can be done while your customer waits.

We help merchants offer products to customers that may have previously been unattainable, and financing can be used for almost any consumer product where financing is appropriate. With United Midwest we help you exceed your customer's expectations.

## ITEMS WE COMMONLY FINANCE:

- » **Pianos**
- » **Musical Instruments**
- » **Bike and Specialty Sporting Goods**
- » **Safes and Security Equipment**
- » **Funeral Services / Caskets**
- » **Spas & Hot Tubs**
- » **Elective Health Services**
- » **Equestrian, Farm, and Western Products**



# Benefits Include:



## FREE TO ENROLL

- » No monthly or annual enrollment charges.

## INCREASING PURCHASING POWER

- » Consumer financing is more than a method of payment. It's a tool to help maximize purchase power and upsell consumers to the highest quality merchandise for each budget.

## WEBSITE AND SHOPPING CART INTEGRATION

- » We offer a number of e-commerce integration solutions that are easily installed to ensure the best fit for your online retail solution.


## VARIETY OF PROMOTIONAL PROGRAMS AVAILABLE

- » A number of different promotional financing programs are available to attract and motivate your best customers to purchase today. Options such as Same as Cash, 0% Annual Percentage Rate, interest rate buy-downs, etc. can be made to fit your goals and budget.

## NEXT-DAY FUNDING

- » Depending on when we receive loan documents, the dealer will receive funding the next business day. Documents received after hours or on weekends will be funded on the following business day.

## FAST AND EFFICIENT TRANSACTION PROCESSING

- » Transactions take just a few minutes to process with many of the approvals provided automatically.
- 

## **Section 11**

# **Public Disclosure CRA Performance Evaluation**

CRA Public File  
Received PE April 25, 2022  
Placed in file May 16, 2022



## **PUBLIC DISCLOSURE**

January 31, 2022

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

United Midwest Savings Bank, National Association  
Charter Number: 25160

6460 Busch Boulevard  
Suite 200  
Columbus, OH 43229

Office of the Comptroller of the Currency

Central Ohio – Indiana Field Office  
655 Metro Place South, Suite 625  
Dublin, OH 43017

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

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## Overall CRA Rating

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

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

The major factors that support this rating include:

- The Lending Test rating is based on the state ratings and the following overall conclusions:
  - The loan-to-deposit (LTD) ratio is more than reasonable.
  - United Midwest Savings Bank, National Association (United Midwest or the bank) exhibits reasonable geographic distribution of loans in the Ohio assessment areas (AAs), given the bank's non-traditional business model discussed below under the "Description of Institution" section.
  - The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes in the Ohio AAs, given the bank's non-traditional business model.
  - In California and Texas, small business lending distributions by gross annual revenues are reasonable.
  - United Midwest has not received any complaints about its Community Reinvestment Act (CRA) performance in helping to meet the AAs' credit needs during the evaluation period.
  - The bank originated five community development (CD) loans totaling approximately \$602,545 in the Ohio AAs, all to affordable housing focused non-profit organizations. Overall, the bank's CD lending represents adequate responsiveness to CD lending needs in the Ohio AAs.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable.

The bank's quarterly average LTD ratio over the 12 quarters since the previous CRA evaluation (December 31, 2018 to September 30, 2021) is 87.7 percent. The ratio ranged from a high of 108.5 percent at September 30, 2020, to a low of 72.2 percent at March 31, 2019. The bank's quarterly average LTD ratio of 87.7 percent is more than reasonable when compared to financial institutions of similar size in the bank's AAs, which includes 13 financial institutions with total assets less than \$1 billion and that are headquartered in one of the bank's AAs. The other 13 financial institutions have an average LTD ratio of 75.2 percent. United Midwest was ranked fourth highest out of the similarly situated financial institutions in the AAs for average LTD ratio during the evaluation period.

### Lending in Assessment Area

A substantial majority of the bank's loans are outside its AAs.

The bank originated and purchased 1.2 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	102	96.2	4	3.8	106	16,779	98.1	322	1.9	17,101
Small Business	63	2.3	2,643	97.7	2,706	18,853	3.2	573,317	96.8	592,170
Consumer	255	0.8	31,745	99.2	32,000	1,534	1.1	144,317	98.9	145,851
Total	420	1.2	34,392	98.8	34,812	37,166	4.9	717,956	95.1	755,122

Source: 01/01/18 – 12/31/20 Bank Data.  
Due to rounding, totals may not equal 100.0%.

Because a random sample of 20 small business and 20 consumer loans would yield an insignificant number of loans to borrowers within the AAs, the Office of the Comptroller of the Currency (OCC) completed a portfolio wide analysis of lending in the AAs using the bank's internal loan reports from 2018 to 2020. The above table displays the total number and dollar volume of loans made in any of the bank's AAs for the primary products during 2018, 2019, and 2020. The percentages are similar to the CRA Performance Evaluation dated November 28, 2018.

Despite the low volume of lending within the AAs, performance within the AAs is overall adequate. United Midwest's non-traditional business model and community development lending activities within the Ohio AAs mitigate the results of the In/Out analysis and overall low volume of lending in the AAs.

Analysis of peer data and active institutions in each AA indicates that the communities are not lacking access to financial services. United Midwest has a small percentage of deposit market share in relation to its competitors in each AA.

Lending activity, both inside and outside the AAs, increased substantially from the previous CRA performance evaluation, which analyzed lending activities in 2015, 2016, and 2017. During the prior evaluation, the bank originated 146 consumer and nine small business loans inside the AAs. Home mortgage lending was not analyzed at the previous evaluation.

In April 2018, United Midwest re-entered the residential lending market on a limited basis to originate home mortgage loans in the bank's Ohio AAs, focusing on originating home mortgage loans to low- and moderate-income (LMI) borrowers and/or in LMI geographies. The volume increased in 2019 and 2020. Additionally, the bank developed a mortgage product, MyPlace, that benefits LMI borrowers, which is discussed below in the performance evaluation. The bank advertises this product locally in the Ohio AAs and considers home mortgage lending a primary product in the Ohio AAs. Home mortgage loans are not offered nationwide.

During the evaluation period, United Midwest originated five CD loans totaling approximately \$602,545 in the Ohio AAs, which are described further below under the Lending Test.

## Description of Institution

United Midwest is a national bank and a wholly owned subsidiary of MSB Capital Corporation, a one-bank holding company. The bank is headquartered in DeGraff, Ohio, in Logan County, and the holding company is headquartered in Columbus, Ohio, in Franklin County. As of December 31, 2020, total assets were \$382 million with \$286 million in net loans and leases, \$297 million in total deposits, and



\$35 million in tier 1 capital. There is no merger or acquisition activity that affects the scope of the bank's operations during the evaluation period.

United Midwest operates the main office in DeGraff, Ohio, in Logan County. The bank has one office in West Manchester, Ohio, in Preble County. The bank has three branches in Franklin County, Ohio, two in Columbus and one in Westerville. The Columbus Branch on Broad Street was opened on February 1, 2018, and the Westerville Branch was opened on November 15, 2018. The opening of the branches did not impact the bank's AAs. All offices are in middle- and upper-income census tracts (CTs) except for the Columbus, Ohio branch on Reed Road, which is in a moderate-income CT. All offices have drive-up facilities, except for the West Manchester Branch. All have 24-hour automated teller machines (ATMs) except for the Columbus Branch on Reed Road. The bank maintains standard operating hours at all branches, including Saturday hours. Additionally, United Midwest has one loan production office (LPO) in Cleveland, Ohio for consumer loan originations and one LPO in Panama City, Florida for smaller Small Business Administration (SBA) loan originations. No offices were closed in Ohio during the evaluation period.

The bank closed (sold real estate and deposits) the branch office in Lake Mary, Florida, in Seminole County on September 20, 2019. However, it was under contract to sell as of April 26, 2019. This branch was in an upper-income CT. Seminole County is mostly a suburban county in the Orlando-Kissimmee-Sanford, FL Metropolitan Statistical Area (MSA). As of the June 30, 2019, Federal Deposit Insurance Corporation (FDIC) deposit market share report, the bank's deposit market share in Seminole County was 0.7 percent, ranking 20<sup>th</sup> out of 26 financial institutions. The market is dominated by large banks. There were no Saturday hours at this branch; however, there was an ATM available. As of this performance evaluation, the OCC included a lending analysis of the Florida AA for years 2018 and 2019 only.

United Midwest was an interstate financial institution with three AAs and two rating areas (Ohio and Florida) during the evaluation period. The AAs are also described in the "Scope of the Evaluation," "Description of Institution's Operations in Ohio," and "Description of Institution's Operations in Florida" sections of this performance evaluation. The AAs are as follows:

- Franklin County, Ohio, in the Columbus, OH MSA 18140 (Columbus MSA AA).
- Champaign, Darke, Logan, and Preble counties in Ohio in a Non-MSA (Non-MSA AA).
- Seminole County, Florida, in the Orlando-Kissimmee-Sanford, FL MSA 36740 (Florida AA) for 2018 and 2019 only.

Presently, no legal or financial impediments exist that could restrict or affect United Midwest's ability to meet the credit needs of its AAs. The bank's previous CRA performance evaluation was dated November 28, 2018, and resulted in a Satisfactory rating.

As of the December 31, 2020, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Reports (UBPR), United Midwest's total loans were approximately \$292 million representing 76 percent of total assets. The bank offers a variety of lending and deposit products and services through its five offices to accommodate its customers, including business, home mortgage, and consumers loans, as well as online and mobile banking. The bank's deposits are gathered from communities surrounding the branch offices in a traditional manner. However, loan operations are not traditional in nature. United Midwest's lending model is to originate two specialty products to a nationwide market, mostly through third-party sources. The primary products are highly specialized niches within the commercial and consumer loan markets.

The bank's primary business focus is commercial and consumer loans on a nationwide basis, and home mortgage loans within their Ohio AAs. The bank's loan portfolio, as of the December 31, 2020, Call Report, is comprised of commercial and commercial real estate loans (business) of 70 percent, consumer loans of 18 percent, residential real estate (home mortgage) loans of 11 percent, and approximately 1 percent in other loans.

### ***Commercial Lending***

The primary lending activity is focused on commercial loans that qualify for partial guarantees through various U.S. government lending programs such as the SBA or U.S. Department of Agriculture (USDA). A substantial majority of the loans originated during the evaluation period were SBA 7(a) program loans. Due to the specialized credit markets in which the bank participates, the borrower base is nationwide with no apparent geographic concentrations.

The bank has two SBA lending operations: a large loan SBA lending operation focusing on SBA guaranteed loans of \$350,000 or more to businesses in certain industries, and a small SBA lending operation focusing on SBA guaranteed loans of \$150,000 or less to borrowers primarily for start-ups. SBA loan applications are generally through national referral sources. According to the National Association of Government Guaranteed Lenders, in 2020 United Midwest was ranked 8<sup>th</sup> largest lender in the nation for total number of SBA loans approved and 12<sup>th</sup> largest in total dollar volume of SBA approved loans, behind large banks including Huntington National Bank, U.S. Bank, National Association (N.A.), and Wells Fargo Bank, N.A.

The COVID-19 pandemic in 2020 impacted the national and local economy. As a result, the bank provided SBA Paycheck Protection Program (PPP) loans to help businesses keep their workforces employed. The bank originated 697 SBA PPP loans totaling \$42 million. Of the 697 PPP loans, 32 loans were originated in the Columbus MSA AA and seven were originated in the Non-MSA AA. Additionally, 74 loans were originated in other areas of Ohio and 584 loans in other states.

### ***Consumer Lending***

Similar to the commercial line of business, the consumer loan portfolio consists of a nationwide borrowing base and a narrow niche market. Consumer lending focuses on loans to individuals for purchase of certain goods and services from approved dealers and retailers nationwide. The majority of the loans are to finance small dollar loans to purchase pianos, band instruments, and safes. During the evaluation period, approximately 77 percent of the consumer loan originations were to finance pianos, band instruments, and safes. United Midwest uses third-party sources to help establish relationships with vendors. Thus, the bank must maintain a national borrowing base to originate the types of loans management and the Board find desirable. A small number of traditional consumer loans have been originated through the bank's local retail branch network as well.

### ***Residential Real Estate Lending***

Residential real estate lending (home mortgage) was largely discontinued from about 2009 to 2017. In April 2018, United Midwest re-entered the residential lending market on a limited basis by hiring a small residential lending staff to re-introduce and originate mortgage loans in the bank's Ohio AAs, focused on making loans to LMI borrowers and in LMI areas. For this purpose, the bank developed a product, MyPlace, that benefits LMI borrowers. The product has a lower than market interest rate, with

lender paid closing costs and a higher loan to value, with no private mortgage insurance requirement. MyPlace is specifically designed to assist LMI families with purchasing or refinancing a home within the bank's Ohio AAs. During the evaluation period, the bank originated 106 home mortgage loans, with 102 in the bank's Ohio AAs. In 2019 and 2020, all the home mortgage loan originations were inside the Ohio AAs. Mortgage loan competition is very strong in the Ohio AAs, with competition from many large banks. Bank management considers home mortgage lending a primary product in the bank's Columbus MSA AA and Non-MSA AA, as the bank only originates mortgage loans in the Ohio AAs and not on a nationwide basis. Therefore, the OCC included home mortgage lending as a primary product during this evaluation in the Ohio AAs.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The OCC used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2018, to December 31, 2020.

Based on discussions with management and the number and dollar volume of loan origination data supplied by the bank during the evaluation period, United Midwest's primary lending focus is small business and consumer lending on a nationwide basis, and home mortgage lending inside the Ohio AAs. Based on the dollar volume of originated and purchased loans during the evaluation period, business loans accounted for 78.4 percent, consumer loans accounted for 19.3 percent, and residential real estate loans accounted for 2.3 percent of total loan originations and purchases. Based on the number of originated and purchased loans during the evaluation period, business loans accounted for 7.8 percent, consumer loans accounted for 91.9 percent, and residential real estate loans accounted for 0.3 percent of total loan originations and purchases.

During the evaluation period, the top four states for business loan originations and purchases were Texas (12.2 percent), Florida (8.9 percent), Ohio (8.5 percent), and California (6.9 percent). Of the 231 total business loans originated and purchased in Ohio, 63 (or 27 percent) were in the Ohio AAs. During the evaluation period, the top four states for consumer loan originations and purchases were California (13.5 percent), Texas (9.7 percent), Florida (6.6 percent), and Washington (5.4 percent). Of the 1,156 total consumer loans originated and purchased in Ohio, 231 (or 20 percent) were inside the Ohio AAs. Since the majority of the loans are originated and purchased outside the AAs, the OCC included a limited-scope review of statewide lending in California and Texas. Refer to "Conclusions for Areas Receiving Limited Scope Reviews" below for more details.

The OCC evaluated the bank's lending performance based on the primary products, small business and consumer loans with a nationwide focus and home mortgage lending with an Ohio AA focus. While the bank offers other lending products, these products were not a primary product during the evaluation period. As a result, the OCC did not consider these as part of the performance evaluation, as an analysis of this data would not be meaningful.

To evaluate the bank's performance during the evaluation period, the OCC relied on internal bank reports for the small business, consumer, and home mortgage loans. For the lending analysis, the OCC transaction tested 60 loans for each primary product during the evaluation period as part of a data integrity examination to confirm the accuracy of the data in the internal bank reports. Bank controls

were deemed sufficient to allow for the reliance on the data in the reports (business revenues, borrower income figures, and location of the borrowers). The OCC noted no substantive deficiencies with the data. Therefore, the OCC used all small businesses, consumer, and home mortgage loans originated and purchased in the AAs for the lending analysis. The analysis includes a review of each primary product when sufficient volume (at least 20 loans) in an AA was present during the evaluation period of 2018, 2019, and 2020.

For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census data and Dun and Bradstreet (D&B) data as of June 2020. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

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

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

United Midwest has three AAs, as described above. The OCC completed a full-scope review for each AA: Columbus MSA AA, Non-MSA AA, and the Florida AA. A community profile for the Columbus MSA AA and Non-MSA AA is provided in the "Description of Institution's Operations in Ohio" section of this evaluation and the Florida community profile is provided in the "Description of Institution's Operations in Florida" section.

### **Ratings**

The bank's overall rating is a blend of the state ratings.

The bank's overall rating is based on all three AAs that received a full-scope review as well as the results of the lending analysis in the two states sampled (California and Texas). More weight was given to the bank's performance in Ohio than Florida. Seminole County, Florida, has relatively few LMI CTs given the large population. Further, approximately 78 percent of the bank's deposits were attributed to the Ohio branch network as of the June 30, 2019, FDIC Deposit Market Share Report (prior to the sale of the Florida branch). Of the loans originated and purchased inside the AAs for all three primary products, only 24 consumer loans were inside the Florida AA. The bank did not originate any small business loans inside the Florida AA during the evaluation period. Additionally, the Florida AA's only branch closed in 2019.

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

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

regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Ohio

**CRA rating for the State of Ohio<sup>1</sup>:** Satisfactory.

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

The major factors that support this rating include:

- The bank's geographic distribution of home mortgage loans, small loans to businesses, and consumer loans reflects an overall reasonable distribution.
- United Midwest's distribution of home mortgage loans, small loans to businesses, and consumer loans reflects an overall reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- United Midwest has not received any complaints about its CRA performance in helping to meet the AAs' credit needs during the evaluation period.
- United Midwest originated five CD loans totaling approximately \$602,545 in the Ohio AAs, all to affordable housing focused non-profit organizations. Overall, the bank's CD lending represents adequate responsiveness to CD lending needs in the AAs.

### Description of Institution's Operations in Ohio

United Midwest has two AAs in Ohio, the Columbus MSA AA and the Non-MSA AA. The AAs meet the requirements of the CRA regulation and do not arbitrarily exclude any LMI areas. There are no designated distressed or underserved CTs in the AA.

Bank management selected the AAs based on the bank's branch locations and the areas with the most deposit and lending activity. The bank is headquartered in Logan County in the Non-MSA AA. However, a majority of the lending and deposit activity is in the Columbus MSA AA, as discussed below.

Deposit operations in Ohio function in a traditional manner with most deposits obtained by bank personnel located in physical offices. Deposit market shares in both Ohio AAs are low, but the AAs are adequately served by other financial institutions as well. Competition from large banks in the Columbus MSA AA is substantial. Loan operations in Ohio do not vary substantially from the overall description of operations also provided in the "Description of Institution" section above.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Columbus MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Columbus MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	284	21.5	26.8	24.3	26.4	1.1
Population by Geography	1,215,761	14.7	26.2	26.6	31.4	1.1
Housing Units by Geography	536,811	16.4	26.7	26.6	30.0	0.3
Owner-Occupied Units by Geography	258,868	7.7	22.6	29.3	40.3	0.0
Occupied Rental Units by Geography	222,078	21.8	30.7	25.5	21.5	0.6
Vacant Units by Geography	55,865	35.4	29.4	18.3	16.2	0.7
Businesses by Geography	97,382	12.1	20.3	25.3	41.7	0.7
Farms by Geography	1,721	9.8	21.3	29.3	39.3	0.2
Family Distribution by Income Level	279,594	24.8	17.5	19.0	38.6	0.0
Household Distribution by Income Level	480,946	26.2	17.1	17.6	39.2	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$153,452
Median Household Income MSA – 18140 Columbus, OH MSA		\$57,948	Median Gross Rent			\$852
			Families Below Poverty Level			12.8%
			Households Below Poverty Level			15.4%
<i>Source: 2015 ACS and 2020 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Columbus MSA AA includes Franklin County, Ohio, in its entirety. There are nine other counties in the Columbus MSA; however, they are not included in the bank's AA. The data in the above table is for Franklin County only. Franklin County is home to the city of Columbus and is larger in population than all other counties in the AA combined. Columbus, Ohio is the county seat of Franklin County. A majority of the bank's lending inside the AAs was in Franklin County, with 87 percent of the consumer lending in Ohio in the Columbus MSA AA, 85.7 percent of small business lending, and 53.9 percent of home mortgage lending in Ohio was in the Columbus MSA AA.

United Midwest has three branches in Franklin County, Ohio. The Westerville branch is in an upper-income CT, the East Broad Street Branch (Columbus) is in a middle-income CT, and the Reed Road Branch (Columbus) is in a moderate-income CT. As stated above, all have an ATM except the Reed Road Branch.

According to the 2015 ACS U.S. Census data, the population of the AA is 1,215,761, with 14.7 percent living in low-income CTs, 26.2 percent living in moderate-income CTs, 26.6 percent living in middle-income CTs, 31.4 percent living in upper-income CTs, and 1.1 percent living in geographies that have not been assigned an income classification. The AA population grew approximately 4.5 percent from the 2010 U.S. Census to the 2015 ACS U.S. Census. The AA includes 279,594 families and 480,946 households. The AA comprises 284 CTs, of which 21.5 percent are low-income, 26.8 are moderate-income, 24.3 percent are middle-income, 26.4 percent are upper-income, and 1.1 percent are in

geographies that have not been assigned an income classification. There were no CT classification changes during the evaluation period.

As stated above, United Midwest's primary business focus includes small business lending. Many of the businesses in the AA are small, as measured by the number of employees and gross annual revenues. According to the D&B data as of June 2020, 83.6 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 63.3 percent have fewer than five employees. Only 2.2 percent of the businesses are headquartered in the bank's AA, and 87.8 percent operate from a single location. As stated above, according to the National Association of Government Guaranteed Lenders, in 2020 United Midwest was ranked 8<sup>th</sup> largest lender in the nation for total number of SBA loans approved and 12<sup>th</sup> largest in total dollar volume of SBA approved loans. According to the 2020 Peer Small Business Data Market Share Report for the Columbus MSA AA, the top small business lenders were JPMorgan Chase Bank, N.A., Huntington National Bank, PNC Bank, N.A., and American Express National Bank, which accounted for almost 54 percent of the small business loan originations in the Columbus MSA AA. United Midwest is not included in the peer small business data report as the bank is not required to report CRA small business loan data.

Home mortgage lending is a primary business focus in the Ohio AAs. According to the 2020 Peer Mortgage Data Report, the top three lenders in the Columbus MSA AA were Huntington National Bank, Union Savings Bank, and JPMorgan Chase Bank, N.A. United Midwest was not included in the peer data report because they were not required to file Home Mortgage Disclosure Act (HMDA) data during the evaluation period.

Competition in the AA is strong due to the presence of many financial institutions, including large banks. Competitors with significant deposit market share at June 30, 2020, include Huntington National Bank, JPMorgan Chase Bank, N.A., PNC Bank, N.A., and Fifth Third Bank, N.A. These four banks account for approximately 80 percent of the total deposit market share in Franklin County. As of the June 30, 2020, FDIC's Deposit Market Share Report, there were 34 financial institutions operating 320 banking offices in Franklin County, including United Midwest. The June 30, 2020, FDIC deposit market share data shows United Midwest's \$170.3 million in total deposits in the AA ranks 16<sup>th</sup> in overall deposit market share at 0.2 percent. Additionally, 68 percent of the total deposits at June 30, 2020, were in the Columbus MSA AA (Franklin County).

During 2018 – 2019, the economic conditions in Franklin County were overall stable. The economy was trending up, the housing market was strong, and unemployment was at historically low levels. For 2020, COVID-19 was challenging to the economy with higher unemployment and a slowing housing market. The "not seasonally adjusted" unemployment rate in Franklin County as of December 2020 was 4.9 percent, which compared favorably with the Ohio unemployment rate of 5.2 percent and national rate of 6.5 percent (Ohio Department of Job and Family Services – Office of Workforce Development – Bureau of Labor Market Information).

The AA has a diverse employer base with many industries, from manufacturing and services to financial services and government industries. Major employers in Franklin County include The Ohio State University, OhioHealth, and the State of Ohio government.

As part of the CRA performance evaluation, the OCC reviewed information provided from interviews with representatives from affordable housing and/or CD organizations. The contacts identified affordable housing as a credit need in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.



Non-MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	0.0	15.6	64.4	20.0	0.0
Population by Geography	178,915	0.0	14.6	65.5	19.9	0.0
Housing Units by Geography	80,451	0.0	16.2	65.9	17.9	0.0
Owner-Occupied Units by Geography	52,348	0.0	11.3	66.8	21.9	0.0
Occupied Rental Units by Geography	18,518	0.0	27.5	61.6	10.9	0.0
Vacant Units by Geography	9,585	0.0	21.1	69.1	9.9	0.0
Businesses by Geography	8,865	0.0	19.1	63.1	17.8	0.0
Farms by Geography	1,157	0.0	4.2	75.4	20.4	0.0
Family Distribution by Income Level	49,125	19.1	17.2	23.1	40.6	0.0
Household Distribution by Income Level	70,866	20.7	16.5	18.8	43.9	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$115,684
Median Household Income Non-MSAs - OH		\$48,531	Median Gross Rent			\$656
			Families Below Poverty Level			9.7%
			Households Below Poverty Level			12.1 %
<i>Source: 2015 ACS and 2020 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Non-MSA AA includes Champaign, Darke, Logan, and Preble Counties in Ohio. The data in the above table is for those counties only. United Midwest has two branches in the Non-MSA AA, a rural area of Ohio. The main office in DeGraff, Ohio is in a middle-income CT in Logan County. Since the DeGraff office is near Champaign County, both counties are included in the AA. The West Manchester branch is in Preble County in a middle-income CT. This branch is also near Darke County, so both counties are included in the AA. Both offices have an ATM. The demographics and economies of these four rural counties are substantially similar, so the OCC considered the four counties as one AA. No branches have been opened or closed in the Non-MSA AA during the evaluation period.

According to the 2015 ACS U.S. Census data, the population of the AA is 178,915, with 14.6 percent living in moderate-income CTs, 65.5 percent living in middle-income CTs, and 19.9 percent living in upper-income CTs. There are no low-income CTs in the Non-MSA AA. The AA comprises 45 CTs, of which 15.6 are moderate-income, 64.4 percent are middle-income, and 20 percent are upper-income CTs. The AA includes 49,125 families and 70,866 households. There were two CT classification changes during the evaluation period. In Champaign County, CT 101 changed from middle-income to upper-income. In Preble County, CT 4701.01 changed from middle-income to upper-income. These were the only changes since the previous evaluation. The CT classification changes were appropriately accounted for in the tables in appendix D.

A majority of the bank's lending inside the Ohio AAs was in Franklin County; however, 13 percent of the consumer lending was in the Non-MSA AA, 14.3 percent of small business lending, and 46.1 percent of home mortgage lending was in the Non-MSA AA. As stated above, United Midwest's primary business focus includes small business lending. Many of the businesses in the AA are small as measured by the number of employees and gross annual revenues. According to the D&B data as of June 2020, 80.9 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 67.5 percent have fewer than five employees. Only 2.3 percent of the businesses are headquartered in the bank's AA, and 87.3 percent operate from a single location. According to the 2020 Peer Small Business Data Market Share Report, the top small business lenders in the Non-MSA AA were Park National Bank, American Express National Bank, Synchrony Bank, and JPMorgan Chase Bank, N.A., which accounted for almost 45 percent of the small business loan originations. United Midwest is not included in the peer small business data report as the bank is not required to report CRA small business loan data.

Home mortgage lending is a primary business focus in the Ohio AAs. According to the 2020 Peer Mortgage Data Report, the top three lenders in the Non-MSA AA were Park National Bank, Quicken Loans, LLC, and Huntington National Bank. United Midwest was not included in the peer data report because they were not required to file HMDA data during the evaluation period.

Competition in the AA is strong due to the presence of many financial institutions, including large banks. Competitors with significant deposit market share at June 30, 2020, include Park National Bank, Greenville National Bank, Perpetual Federal Savings Bank of Urbana, Civista Bank, and Huntington National Bank. These five banks account for approximately 43 percent of the total deposit market share in the Non-MSA AA. As of the June 30, 2020, FDIC's Deposit Market Share Report, there were 30 financial institutions operating 72 banking offices in the Non-MSA AA, including United Midwest. The June 30, 2020, FDIC deposit market share data shows United Midwest's \$80.2 million in total deposits in the AA ranks 16<sup>th</sup> in overall deposit market share at 2.3 percent. Additionally, 32 percent of the total deposits at June 30, 2020, were in the Non-MSA AA.

During 2018 – 2019, the economic conditions in the Non-MSA AA were overall stable. The economy was trending up, the housing market was stable, and unemployment was at historically low levels. For 2020, COVID-19 was challenging to the economy with higher unemployment and a slowing housing market. The "not seasonally adjusted" unemployment rates as of December 2020 were 4.1 percent in Champaign County, 4.2 percent in Darke County, 4.3 percent in Logan County, and 4.2 percent in Preble County, which compare favorably with the Ohio unemployment rate of 5.2 percent and national rate of 6.5 percent (Ohio Department of Job and Family Services – Office of Workforce Development – Bureau of Labor Market Information).

The AA has a diverse employer base with many industries, from manufacturing and services to government and agriculture. Major employers in Champaign County include KTH Parts Industries, Inc., Rittal Corporation, and Honeywell International Inc. Primary employers in Darke County include Whirlpool Corporation, Midmark Corporation, and Greenville Technology, Inc. Major employers in Logan County include Honda of America Manufacturing, Inc., Honda Transmission Manufacturing, Inc., Midwest Express, and county and city government. Large employers in Preble County include Neaton Auto Parts, Parker-Haniffin Corporation, and Henny Penny Corporation.

As part of the CRA performance evaluation, the OCC reviewed information provided from interviews with representatives from affordable housing and/or CD organizations. The contacts identified

affordable housing as a credit need in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

## **Scope of Evaluation in Ohio**

The OCC performed full-scope reviews of the Columbus MSA AA and Non-MSA AA. The data in these AAs were analyzed and presented as two separate AAs for purposes of this performance evaluation. Small business, consumer, and home mortgage lending (within the Ohio AAs only for home mortgage lending) are the bank's primary products and were evaluated under the Lending Test. As discussed above, the OCC placed more weight on the Ohio AAs, given the majority of the consumer, small business, and home mortgage lending and deposits were in the Ohio AAs. Refer to the "Scope of the Evaluation" section for more details.

## **LENDING TEST**

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

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

Based on full-scope reviews, the bank's performance in the Columbus MSA AA and Non-MSA AA is adequate.

Home mortgage lending is a primary product in the Ohio AAs only. During the evaluation period, there was an insufficient number on small loans to businesses in the Non-MSA AA for a meaningful analysis.

During the evaluation period, United Midwest originated five CD loans totaling approximately \$602,545 in the Ohio AAs, all to affordable housing focused non-profit organizations. Four CD loans were originated in the Columbus MSA AA totaling \$452,545, representing 1.9 percent of prorated tier 1 capital based on total deposits as of December 31, 2020. One loan was originated in the Non-MSA AA totaling \$150,000, which equates to 1.3 percent of prorated tier 1 capital. Overall, the bank's CD lending represents adequate responsiveness to CD lending needs in the AAs.

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

The bank exhibits reasonable geographic distribution of loans in the State.

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

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

The bank exhibits an excellent geographic distribution of home mortgage loans in both AAs.

Columbus MSA AA

United Midwest exhibits an excellent distribution of home mortgage loans in the Columbus MSA AA. The percentage of home mortgage loans originated and purchased by the bank in the LMI CTs significantly exceeds both the demographic comparator and the aggregate lending data of other HMDA reporters, demonstrating overall excellent performance.

Non-MSA AA

United Midwest exhibits an excellent distribution of home mortgage loans in the Non-MSA AA. The percentage of home mortgage loans originated and purchased by the bank in the moderate-income CTs significantly exceeds both the demographic comparator and the aggregate lending data of other HMDA reporters, demonstrating excellent performance. There are no low-income CTs in the Non-MSA AA.

***Small Loans to Businesses***

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

The OCC compared the percentage of the number of small loans to businesses originated by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of businesses throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to businesses of other lenders (aggregate data), as demonstrated by CRA aggregate data.

The bank exhibits a reasonable geographic distribution of small loans to businesses in the Columbus MSA AA.

Columbus MSA AA

United Midwest exhibits an overall reasonable distribution of small loans to businesses in the Columbus MSA AA. The percentage of small loans to businesses originated and purchased by the bank in the low-income CTs is below demographic and aggregate data. However, the percentage of small loans to businesses originated and purchased by the bank in the moderate-income CTs significantly exceeds both the demographic and aggregate data, reflecting overall reasonable performance. There is strong competition for loans in the Columbus MSA AA, with approximately 54 percent of the small loans to businesses originated or purchased by four large banks during the evaluation period in the Columbus MSA AA.

Non-MSA AA

During the evaluation period, United Midwest originated eight small loans to businesses, which is insufficient for a meaningful analysis.

### ***Consumer Loans***

Refer to Table U in the State of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The OCC compared the percentage of the number of consumer loans originated by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the percentage distribution of households in those geographies (demographic data), placing emphasis on the LMI geographies.

The bank exhibits an overall reasonable geographic distribution of consumer loans, given the bank's non-traditional business model. The OCC noted that most consumer loans are obtained through third-party sources who have relationships with the product or service provider. Consequently, the bank's ability to effectively target a market based on geographic considerations is more limited than for a traditional bank.

#### **Columbus MSA AA**

Given United Midwest's non-traditional business model, the distribution of consumer loans in the Columbus MSA AA is reasonable. The percentage of consumer loans originated and purchased by the bank in low-income CTs is significantly below demographic data (percentage of households). However, the percentage of consumer loans originated and purchased by the bank in moderate-income CTs is below demographic data but is overall reasonable. The bank originated or purchased six loans to borrowers in low-income CTs and 40 loans to borrowers in moderate-income CTs during the evaluation period in the Columbus MSA AA.

The OCC also considered other factors in the bank's performance during the review, including that 36.8 percent of the households in the low-income CTs in the Columbus MSA AA live below poverty and 19.4 percent of the households in moderate-income CTs in the AA live below poverty.

#### **Non-MSA AA**

Distribution of consumer loans in the Non-MSA AA is poor. United Midwest did not originate or purchase any consumer loans in the moderate-income CTs during the evaluation period in the Non-MSA AA. Given the bank's non-traditional business model and reliance on third-party sources for originations, these factors prevented geographic loan distribution in the Non-MSA AA from being very poor. As most consumer loans are originated in the Columbus MSA AA, more reliance was placed on the Columbus MSA AA for the evaluation.

The OCC also noted that 20.7 percent of the households in the moderate-income CTs in the Non-MSA AA live below poverty. There are no low-income CTs in the Non-MSA AA.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank and the bank's non-traditional business model.

The bank lending performance in the AAs was supplemented by the origination of five CD loans, totaling \$602,545, as discussed above.

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

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

United Midwest's distribution of home mortgage loans by borrower income level reflects overall excellent distribution.

### **Columbus MSA AA**

United Midwest's distribution of home mortgage loans by borrower income level in the Columbus MSA AA reflects excellent distribution. The bank's percentage of home mortgage loans to low-income borrowers exceeds aggregate lending data but is below demographic data. The bank's percentage of home mortgage loans to moderate-income borrowers significantly exceeds both demographic and aggregate lending data of other HMDA reporters.

### **Non-MSA AA**

The bank's distribution of home mortgage loans by borrower income level in the Non-MSA AA reflects overall excellent distribution. The bank's percentage of home mortgage loans to low-income borrowers is below both aggregate and demographic data but is overall reasonable. The bank's percentage of home mortgage loans to moderate-income borrowers exceeds both demographic and aggregate lending data of other HMDA reporters.

The OCC considered other factors in the bank's performance during the review, including that 9.7 percent of the families live below poverty and there is strong competition for loans in the AA.

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

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

The OCC compared the percentage distribution of the number of small loans to businesses originated by the bank by gross annual revenue level to businesses with gross annual revenues of \$1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small business data, as demonstrated by CRA aggregate data.

United Midwest exhibits a reasonable distribution of small loans to businesses of different sizes.

Columbus MSA AA

United Midwest exhibits a reasonable distribution of small loans to businesses of different sizes within the Columbus MSA AA. As evidenced in Table R in the State of Ohio section of appendix D, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeds aggregate lending data, but is below the percentage of businesses with gross annual revenues of \$1 million or less (demographic data). However, 35.4 percent of the loans did not have income available, with most of these loans being SBA PPP loans that did not require the disclosure of gross annual revenues. The majority of the bank's small loans to businesses are SBA loans for start-ups, which have gross annual revenues under \$1 million.

In the lending analysis, the OCC considered performance context factors, including strong competition in the AA. Additionally, the top small business lenders in the AA were large banks, including JPMorgan Chase Bank, N.A., Huntington National Bank, PNC Bank, N.A., and American Express National Bank, as discussed above in the "Description of Institution's Operations in Ohio," which accounted for almost 54 percent of the small business loan originations in the Columbus MSA AA.

Non-MSA AA

During the evaluation period, United Midwest originated eight small loans to businesses, which is insufficient for a meaningful analysis.

**Consumer Loans**

Refer to Table V in the State of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The OCC compared the percentage distribution of the number of consumer loans originated by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in the AA.

United Midwest's overall distribution of consumer loans reflects poor distribution. As discussed above, the OCC noted that most consumer loans are obtained through third-party sources who have relationships with the product or service provider. Consequently, the bank's ability to effectively target a market is more limited than for a traditional bank. The bank's business model and the nature of the products limiting demand among LMI consumers was considered; however, these were not sufficient to describe the distribution as adequate.

Columbus MSA AA

United Midwest's distribution of consumer loans by borrower income in the Columbus MSA AA is poor. The percentage of consumer loans originated or purchased by the bank was significantly below the percentage of low-income households and was well below the percentage of moderate-income households. The OCC considered other factors in the bank's performance during the review, including that 15.4 percent of the households live below poverty. Limited income is a substantial obstacle to credit qualification and the bank's primary consumer lending products are for excess goods such as safes, pianos, band instruments, and elective health procedures. As stated above, the OCC considered the nature of the products limiting demand among LMI borrowers; however, this was not considered

sufficient to describe the distribution as adequate. Rather, those factors prevented the borrower-income distribution from being very poor.

The lending performance in the Columbus MSA AA was supplemented by the origination of four responsive CD loans, as discussed above. The loans were to an affordable housing focused non-profit organization that assists LMI individuals and families in the AA with affordable housing options.

Additionally, the OCC noted that the number of low-income families (69,474) in Franklin County is significant and far greater than any of the bank's other AAs. Management's decision to provide substantial CD loans in Franklin County is appropriate.

#### Non-MSA AA

United Midwest's distribution of loans by borrower income level in the Non-MSA AA reflects overall reasonable distribution. The bank's level of consumer lending to low-income borrowers is below the demographic data but exceeds demographic data for moderate-income borrowers. The OCC considered performance context factors including the nature of the products limiting demand among low-income borrowers and that 12.1 percent of the households in the Non-MSA AA live below poverty.

#### **Responses to Complaints**

The bank has not received any complaints about its CRA performance in helping to meet the AAs' credit needs during the evaluation period.



## State Rating

### State of Florida

**CRA rating for the State of Florida<sup>2</sup>:** Satisfactory.

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

The major factors that support this rating include:

- Based on a full-scope review, the bank's lending test performance in the Florida AA is overall reasonable.
- Substantial performance context factors limited lending opportunities in Florida and are described below. The bank's only branch in Florida was under contract to sell as of April 26, 2019, and was sold as of September 20, 2019.
- United Midwest has not received any complaints about its CRA performance in helping to meet the AA's credit needs during the evaluation period.

### Description of Institution's Operations in Florida

#### Florida AA

Demographic Information of the Assessment Area						
Assessment Area: Florida AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	1.2	14.0	36.0	48.8	0.0
Population by Geography	437,346	0.5	10.4	34.8	54.3	0.0
Housing Units by Geography	184,374	0.7	12.3	36.7	50.3	0.0
Owner-Occupied Units by Geography	102,912	0.1	9.1	31.4	59.3	0.0
Occupied Rental Units by Geography	49,348	1.3	15.2	45.1	38.4	0.0
Vacant Units by Geography	32,114	1.6	18.3	40.8	39.4	0.0
Businesses by Geography	69,522	0.5	8.5	34.4	56.5	0.0
Farms by Geography	1,620	0.6	13.0	31.0	55.4	0.0
Family Distribution by Income Level	101,235	15.5	15.0	18.5	50.9	0.0
Household Distribution by Income Level	152,260	18.7	15.1	17.1	49.1	0.0
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$57,304	Median Housing Value			\$180,984

<sup>2</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Median Household Income MSA – 36740 Orlando-Kissimmee-Sanford, FL MSA	\$60,976	Median Gross Rent	\$1,100
		Families Below Poverty Level	8.3%
		Households Below Poverty Level	10.8%
<i>Source: 2015 ACS and 2020 D&amp;B Data. Due to rounding, totals may not equal 100.0% (* The NA category consists of geographies that have not been assigned an income classification.</i>			

The bank's only office in Florida was in Lake Mary, a suburb of Orlando. The office was in the Orlando-Kissimmee-Sanford MSA 36740, in an upper income CT. The Florida AA included Seminole County only, which is in the central portion of Florida. There are three other counties (Lake, Orange, and Osceola) in the Orlando-Kissimmee-Sanford MSA; however, they were not included in the bank's AA. Seminole County's population was second highest of the four counties in the Orlando-Kissimmee-Sanford MSA, behind Orange County. Sanford is the county seat of Seminole County. The data in the table above is for Seminole County only. United Midwest closed the Lake Mary, Florida Branch in September 2019; it was under contract to sell as of April 2019. The Florida AA was included in this performance evaluation for 2018 and 2019 only. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude any LMI areas. There are no designated distressed or underserved CTs in the AA.

Deposit operations in Florida functioned in a traditional manner with most deposits obtained through the physical office. Loan operations in Florida did not vary substantially from the overall description of operations provided in the "Description of Institution" section above. During the evaluation period of 2018 – 2019, United Midwest did not originate any small business loans in the Florida AA, which is insufficient for a meaningful analysis. However, the bank originated 24 consumer loans, which was commensurate with the volume originated during the prior CRA evaluation period.

According to the 2015 ACS U.S. Census data, the population of the AA is 437,346, with 0.5 percent living in low-income CTs, 10.4 percent living in moderate-income CTs, 34.8 percent living in middle-income CTs, and 54.3 percent living in upper-income CTs. The AA comprises 86 CTs, of which 1.2 are low-income, 14 percent are moderate-income, 36 percent are middle-income, and 48.8 percent are upper-income CTs. The AA includes 101,235 families and 152,260 households. There were no CT classification changes during the evaluation period.

As stated above, United Midwest's primary business focus includes small business and consumer lending in the Florida AA. Home mortgage lending was not a primary business product in the Florida AA. According to the 2019 Peer Small Business Data Market Share Report, the top small business lenders in Seminole County were American Express National Bank, JPMorgan Chase Bank, N.A., and Bank of America, N.A., which accounted for almost 53 percent of the small business loan originations in the Florida AA. United Midwest was not included in the peer small business data report as the bank was not required to report CRA small business loan data.

Competition in the AA is strong due to the presence of many financial institutions, including large banks. Competitors with significant deposit market share at June 30, 2019, include Bank of America, N.A, SunTrust Bank, Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A. These four banks account for approximately 57 percent of the total deposit market share in Seminole County. As of the June 30, 2019, FDIC's Deposit Market Share Report, there were 26 financial institutions operating 110 banking offices in the Seminole County, including United Midwest. The June 30, 2019, FDIC deposit

market share data shows United Midwest's \$61.3 million in total deposits in the AA ranked 20<sup>th</sup> in overall deposit market share at 0.7 percent. Additionally, approximately 22 percent of the total deposits at June 30, 2019, were in the Florida AA.

During 2018 – 2019, the economic conditions in the Florida AA were overall stable. The “not seasonally adjusted” unemployment rate as of December 2019 was 2.8 percent in Seminole County, which was commensurate with the Florida statewide unemployment rate of 2.9 percent (U.S. Bureau of Labor Statistics).

The AA has a diverse employer base with many industries, including health care, services, financial services, and retail trade. Major employers in Seminole County include Concentrix Corporation, JPMorgan Chase Bankcard Services, Deloitte Consulting LLP, and the local school systems.

As part of the CRA performance evaluation, the OCC reviewed information provided from interviews with representatives from CD organizations. The contacts identified small business lending and affordable housing as credit needs in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

### **Scope of Evaluation in Florida**

The OCC performed a full-scope review of the Florida AA. The data in this AA was analyzed and presented as one AA for purposes of this performance evaluation. Small business and consumer lending are the bank's primary products in the Florida AA and were evaluated under the Lending Test. Home mortgage lending is not a primary product in the Florida AA and was not analyzed as such. As discussed above, the OCC placed more weight on the Ohio AAs, with the majority of the lending and deposits in the Ohio AAs. Refer to the “Scope of the Evaluation” section for more details.

United Midwest did not originate any small loans to businesses in the Florida AA during the evaluation period of 2018 and 2019, which is insufficient for a meaningful analysis. However, the bank originated 24 consumer loans, which was commensurate with the volume originated during the prior CRA evaluation period.

### **LENDING TEST**

The bank's performance under the Lending Test in Florida is rated Satisfactory, given that the Florida branch was under contract to sell as of April 26, 2019, and sold as of September 20, 2019.

The OCC noted that there was a need for affordable housing in Seminole County; however, the number of low-income families in Seminole County was far lower (15,679) than in Franklin County (69,474). Thus, given that the bank was actively trying to sell the Florida branch during the evaluation period, management's decision to provide five CD loans in the Ohio AAs rather than Seminole County, Florida, was reasonable. Management had limited ability to identify risk-appropriate CD lending opportunities in Seminole County.

Additionally, just one of 86 CTs in the Florida AA was low-income and only 0.5 percent of the total population resided in this one CT. To a less severe extent, there was also limited ability to lend in the 12 moderate-income CTs, which represented 14 percent of all CTs and only 10.4 percent of the AA

population. United Midwest's only office in the county was not near the LMI CTs, and the bank's primary mechanisms for loan originations did not involve physical branches.

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

Based on a full-scope review, the bank's performance in the Florida AA is adequate.

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

The bank exhibits reasonable geographic distribution of loans in the State, given the bank's non-traditional business model and that the branch was under contract to sell as of April 26, 2019.

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

During the evaluation period, United Midwest did not originate any small loans to businesses, which is insufficient for a meaningful analysis.

#### ***Consumer Loans***

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

The OCC compared the percentage of the number of consumer loans originated by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the percentage distribution of households in those geographies (demographic data), placing emphasis on the LMI geographies.

The geographic distribution of consumer loans in the Florida AA is overall reasonable given that the branch was under contract to sell. The percentage of consumer loans originated and purchased by the bank was below the percentage of households in low-income CTs and well below the percentage of households in moderate-income CTs. Less than 1 percent of CTs were low-income and the bank did not originate any loans in low-income CTs, which is reasonable given the limited scale of operations in the state during the evaluation period. Whether or not a piano or musical dealer is in the market area makes a difference in the number of consumer loans originated in that AA.

Competition in the AA is strong. United Midwest was ranked 20<sup>th</sup> out of 26 financial institutions in the AA by deposit market share. In discussions with management, competition in the area and the bank actively trying to sell the branch during the evaluation period contributed to the low volume of loan originations.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank and the bank's non-traditional business model.

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

During the evaluation period, United Midwest did not originate any small loans to businesses, which is insufficient for a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the State of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The OCC compared the percentage distribution of the number of consumer loans originated by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in the AA.

United Midwest's distribution of consumer loans by borrower income level in the Florida AA reflects overall reasonable distribution, given that management was actively trying to sell the branch since the prior CRA performance evaluation in 2018 and was under contract to sell as of April 26, 2019. The bank's level of consumer lending was well below the percentage of LMI households in the AA.

As stated above, there was substantial competition in the AA as well as 10.8 percent of the households below poverty. Additionally, the number of piano or musical dealers in the market area impacts the volume of consumer loans originated.

### **Responses to Complaints**

The bank has not received any complaints about its CRA performance in helping to meet the AA's credit needs during the evaluation period.

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

Because of the bank's non-traditional business model and resultant high percentage of loans outside of its AAs, the OCC also conducted a borrower-income distribution analysis in two of the bank's high-volume states, Texas and California. Based on these limited scope reviews, the bank's performance under the lending test in both Texas and California is consistent with the bank's overall satisfactory performance.

Given the significant performance context matters present regarding the bank's business model as described under the "Description of Institution" section, performance in both states represented overall adequate lending patterns to LMI borrowers and businesses with \$1 million or less in gross annual revenues. By dollar volume, a majority of the bank's loan originations and purchases during the evaluation period are business loans. In both Texas and California, the bank's small loans to businesses compared favorably with aggregate lending data of other small business loan reporters and reasonably with demographic data. Of note, the bank originated approximately 68 SBA PPP loans in Texas and 52 SBA PPP loans in California, which accounts for most of the small loans to businesses with revenue data not available in Table R in those states in appendix D.

Refer to Tables R and V below for lending activity by borrower-income level in both Texas and California.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/18 – 12/31/20	
<b>Bank Products Reviewed:</b>	Small Business Loans, Consumer Loans, and Home Mortgage Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>States</b>		
Ohio		
Columbus MSA AA	Full Scope	Franklin County, Ohio, in the Columbus, OH MSA 18140.
Non-MSA AA	Full Scope	Champaign, Darke, Logan, and Preble Counties in Ohio.
Florida		
Florida AA	Full Scope	Seminole County, Florida, in the Orlando-Kissimmee-Sanford, FL MSA 36740.

## Appendix B: Summary of State Ratings

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Ratings: United Midwest Savings Bank, National Association	
<b>Overall Bank:</b>	Lending Test Rating
United Midwest Savings Bank, National Association	Satisfactory
<b>States:</b>	
Ohio	Satisfactory
Florida	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

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

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

State of Ohio

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-20
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Columbus MSA AA	55	10,018	53.9	50,276	7.7	50.9	6.9	22.6	23.6	20.0	29.3	9.1	29.8	40.3	16.4	43.3	0.0	0.0	0.1
Non-MSA AA	47	6,761	46.1	5,122	0.0	0.0	0.0	11.3	46.8	11.4	66.8	40.4	65.5	21.9	12.8	23.1	0.0	0.0	0.0
Total	102	16,779	100.0	55,398	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-20
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbus MSA AA	55	10,018	53.9	50,276	24.8	10.9	7.5	17.5	38.2	19.2	19.0	25.5	20.5	38.6	25.5	37.1	0.0	0.0	15.7
Non-MSA AA	47	6,761	46.1	5,122	19.1	4.3	6.8	17.2	23.4	19.6	23.1	29.8	23.6	40.6	42.6	35.9	0.0	0.0	14.0
Total	102	16,779	100.0	55,398	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2018-20</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Columbus MSA AA	48	6,366	100.0	25,743	12.1	8.3	17.7	20.3	27.1	17.6	25.3	25.0	23.0	41.7	39.6	41.3	0.7	0.0	0.4	
<b>Total</b>	<b>48</b>	<b>6,366</b>	<b>100.0</b>	<b>25,743</b>	<b>12.1</b>	<b>8.3</b>	<b>17.7</b>	<b>20.3</b>	<b>27.1</b>	<b>17.6</b>	<b>25.3</b>	<b>25.0</b>	<b>23.0</b>	<b>41.7</b>	<b>39.6</b>	<b>41.3</b>	<b>0.7</b>	<b>0.0</b>	<b>0.4</b>	

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2018-20</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Columbus MSA AA	48	6,366	100.0	25,743	83.6	50.0	44.9	5.4	14.6	11.0	35.4		
<b>Total</b>	<b>48</b>	<b>6,366</b>	<b>100.0</b>	<b>25,743</b>	<b>83.6</b>	<b>50.0</b>	<b>44.9</b>	<b>5.4</b>	<b>14.6</b>	<b>11.0</b>	<b>35.4</b>		

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.*

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>														<b>2018-20</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
Columbus MSA AA	201	1,277	87.0	14.2	3.0	26.4	19.9	27.6	29.9	31.6	46.8	0.3	0.5		
Non-MSA AA	30	174	13.0	0.0	0.0	15.5	0.0	65.5	86.7	19.0	13.3	0.0	0.0		
<b>Total</b>	<b>231</b>	<b>1,451</b>	<b>100.0</b>	--	--	--	--	--	--	--	--	--	--		

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>														<b>2018-20</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers			
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
Columbus MSA AA	201	1,277	87.0	26.2	1.5	17.1	5.0	17.6	14.4	39.2	79.1	0.0	0.0		
Non-MSA AA	30	174	13.0	20.7	16.7	16.5	20.0	18.8	20.0	43.9	43.3	0.0	0.0		
<b>Total</b>	<b>231</b>	<b>1,451</b>	<b>100.0</b>	--	--	--	--	--	--	--	--	--	--		

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.



State of Florida

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2018-19	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Florida AA	24	83	100.0	0.5	0.0	11.1	4.2	35.9	29.2	52.6	66.7	0.0	0.0	
<b>Total</b>	<b>24</b>	<b>83</b>	<b>100.0</b>	<b>0.5</b>	<b>0.0</b>	<b>11.1</b>	<b>4.2</b>	<b>35.9</b>	<b>29.2</b>	<b>52.6</b>	<b>66.7</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Bank Data.  
Due to rounding, totals may not equal 100.0%.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2018-19	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Florida AA	24	83	100.0	18.7	0.0	15.1	4.2	17.1	16.7	49.1	79.2	0.0	0.0	
<b>Total</b>	<b>24</b>	<b>83</b>	<b>100.0</b>	<b>18.7</b>	<b>0.0</b>	<b>15.1</b>	<b>4.2</b>	<b>17.1</b>	<b>16.7</b>	<b>49.1</b>	<b>79.2</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Bank Data.  
Due to rounding, totals may not equal 100.0%.

## State of Texas

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Texas	326	40,578	100.0	719,240	87.1	78.5	37.3	4.0	0.6	8.9	20.9	
<b>Total</b>	<b>326</b>	<b>40,578</b>	<b>100.0</b>	<b>719,240</b>	<b>87.1</b>	<b>78.5</b>	<b>37.3</b>	<b>4.0</b>	<b>0.6</b>	<b>8.9</b>	<b>20.9</b>	

Source: 2020 D&B Data; 01/01/2018 – 12/31/2020 Bank Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.  
Lending in the State of Texas was evaluated as one AA.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Texas	3,101	15,690	100.0	24.5	2.6	16.1	5.3	17.3	10.5	42.2	81.5	0.0	0.0	
<b>Total</b>	<b>3,101</b>	<b>15,690</b>	<b>100.0</b>	<b>24.5</b>	<b>2.6</b>	<b>16.1</b>	<b>5.3</b>	<b>17.3</b>	<b>10.5</b>	<b>42.2</b>	<b>81.5</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.  
Due to rounding, totals may not equal 100.0%.  
Lending in the State of Texas was evaluated as one AA.

State of California

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
California	179	24,704	100.0	1,240,681	88.2	67.6	40.7	4.5	2.8	7.3	29.6	
<b>Total</b>	<b>179</b>	<b>24,704</b>	<b>100.0</b>	<b>1,240,681</b>	<b>88.2</b>	<b>67.6</b>	<b>40.7</b>	<b>4.5</b>	<b>2.8</b>	<b>7.3</b>	<b>29.6</b>	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data.  
 Due to rounding, totals may not equal 100.0%.  
 Lending in the State of California was evaluated as one AA.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
California	4,318	19,463	100.0	25.3	3.8	15.6	8.4	16.7	15.3	42.5	72.6	0.0	0.0	
<b>Total</b>	<b>4,318</b>	<b>19,463</b>	<b>100.0</b>	<b>25.3</b>	<b>3.8</b>	<b>15.6</b>	<b>8.4</b>	<b>16.7</b>	<b>15.3</b>	<b>42.5</b>	<b>72.6</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.  
 Due to rounding, totals may not equal 100.0%.  
 Lending in the State of California was evaluated as one AA.

## **Section 12**

# **HMDA Disclosure**

## **HMDA Disclosure Statement**

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and was implemented by the Federal Reserve Board's Regulation C. On July 21, 2011, the rule-writing authority of Regulation C was transferred to the Consumer Financial Protection Bureau (CFPB). HMDA requires many, but not all, lenders to collect and report information regarding loan applications they receive, loans they originate and loans they purchase from other lenders. Not all loans are included; information is only reported if the loan or application meets specific criteria set forth in Regulation C. This information is recorded on the HMDA Loan / Application Register (LAR) and reported annually to the government.

Depository and non-depository institutions must meet certain criteria, such as originating a minimum number of loans, before they are required to complete a LAR.

HMDA requires that for each application or loan, institutions report information about the loan application, the property, and the applicant. For most applicants, this includes reporting the applicant's race, ethnicity, sex and income.

The bank's HMDA data may be obtained on the Consumer Financial Protection Bureau's website at <http://www.consumerfinance.gov/hmda>.

HMDA data for many other financial institutions are also available at this website.

## **Section 13**

# **Consumer Loans**

**Table D - Lending Inside and Outside of the Assessment Area**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Consumer										
2024	70	1.2	5,533	98.8	5,603	703,000.00	1.4	48,855,000.00	98.6	49,558,000.00
<b>Subtotal</b>	<b>70</b>	<b>1.2</b>	<b>5,533</b>	<b>98.8</b>	<b>5,603</b>	<b>703,000.00</b>	<b>1.4</b>	<b>48,855,000.00</b>	<b>98.6</b>	<b>49,558,000.00</b>
<b>Total</b>	<b>70</b>	<b>1.2</b>	<b>5,533</b>	<b>98.8</b>	<b>5,603</b>	<b>703,000.00</b>	<b>1.4</b>	<b>48,855,000.00</b>	<b>98.6</b>	<b>49,558,000.00</b>

Source: Bank Data  
 Due to rounding, totals may not equal 100.0  
 Dollar amounts for Small Business, Small Farm, and Consumer loans are multiplied by 1000.

**Table U - Assessment Area Distribution of Consumer Loans by Income Category of the Geography**

**2024**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Champaign County	1	7	1.4	0.0	0.0	0.0	0.0	81.4	100.0	18.6	0.0	0.0	0.0
Darke County	0	0	0.0	7.6	0.0	0.0	0.0	72.8	0.0	19.7	0.0	0.0	0.0
Franklin County	63	673	90.0	12.6	3.2	22.8	11.1	34.4	30.2	28.9	52.4	1.2	3.2
Logan County	5	18	7.1	0.0	0.0	16.1	20.0	39.1	0.0	44.8	80.0	0.0	0.0
Preble County	1	5	1.4	0.0	0.0	0.0	0.0	68.5	100.0	31.5	0.0	0.0	0.0
<b>Total</b>	<b>70</b>	<b>703</b>	<b>100.0</b>	<b>11.4</b>	<b>2.9</b>	<b>20.6</b>	<b>11.4</b>	<b>38.1</b>	<b>30.0</b>	<b>28.9</b>	<b>52.9</b>	<b>1.1</b>	<b>2.9</b>

Source: 2020 ACS; Bank Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%



**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower**

**2024**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Champaign County	1	7	1.4	17.3	100.0	15.0	0.0	21.5	0.0	46.2	0.0	0.0	0.0
Darke County	0	0	0.0	21.0	0.0	17.7	0.0	18.3	0.0	43.0	0.0	0.0	0.0
Franklin County	63	673	90.0	25.4	15.9	17.4	15.9	18.6	27.0	38.6	41.3	0.0	0.0
Logan County	5	18	7.1	19.1	80.0	15.5	0.0	18.3	20.0	47.0	0.0	0.0	0.0
Preble County	1	5	1.4	18.5	0.0	14.4	100.0	19.4	0.0	47.7	0.0	0.0	0.0
<b>Total</b>	<b>70</b>	<b>703</b>	<b>100.0</b>	<b>24.6</b>	<b>21.4</b>	<b>17.2</b>	<b>15.7</b>	<b>18.7</b>	<b>25.7</b>	<b>39.5</b>	<b>37.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2020 ACS; Bank Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table D - Lendi Inside and Outside of the Assessment Area**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Consumer										
2023	78	1.4	5,584	98.6	5,662	368,000.00	0.8	44,895,000.00	99.2	45,263,000.00
<b>Subtotal</b>	<b>78</b>	<b>1.4</b>	<b>5,584</b>	<b>98.6</b>	<b>5,662</b>	<b>368,000.00</b>	<b>0.8</b>	<b>44,895,000.00</b>	<b>99.2</b>	<b>45,263,000.00</b>
<b>Total</b>	<b>78</b>	<b>1.4</b>	<b>5,584</b>	<b>98.6</b>	<b>5,662</b>	<b>368,000.00</b>	<b>0.8</b>	<b>44,895,000.00</b>	<b>99.2</b>	<b>45,263,000.00</b>

Source: Bank Data  
 Due to rounding, totals may not equal 100.0  
 Dollar amounts for Small Business, Small Farm, and Consumer loans are multiplied by 1000.

**Table U - Assessment Area Distribution of Consumer Loans by Income Category of the Geography**

**2023**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Champaign County	2	10	2.6	0.0	0.0	0.0	0.0	81.4	50.0	18.6	50.0	0.0	0.0
Darke County	1	2	1.3	7.6	0.0	0.0	0.0	72.8	100.0	19.7	0.0	0.0	0.0
Franklin County	61	286	78.2	12.6	8.2	22.8	14.8	34.4	41.0	28.9	36.1	1.2	0.0
Logan County	7	32	9.0	0.0	0.0	16.1	85.7	39.1	14.3	44.8	0.0	0.0	0.0
Preble County	7	38	9.0	0.0	0.0	0.0	0.0	68.5	85.7	31.5	14.3	0.0	0.0
<b>Total</b>	<b>78</b>	<b>368</b>	<b>100.0</b>	<b>11.4</b>	<b>6.4</b>	<b>20.6</b>	<b>19.2</b>	<b>38.1</b>	<b>43.6</b>	<b>28.9</b>	<b>30.8</b>	<b>1.1</b>	<b>0.0</b>

Source: 2020 ACS; Bank Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower**

**2023**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Champaign County	2	10	2.6	17.3	0.0	15.0	100.0	21.5	0.0	46.2	0.0	0.0	0.0
Darke County	1	2	1.3	21.0	100.0	17.7	0.0	18.3	0.0	43.0	0.0	0.0	0.0
Franklin County	61	286	78.2	25.4	21.3	17.4	19.7	18.6	31.1	38.6	27.9	0.0	0.0
Logan County	7	32	9.0	19.1	57.1	15.5	28.6	18.3	14.3	47.0	0.0	0.0	0.0
Preble County	7	38	9.0	18.5	14.3	14.4	57.1	19.4	14.3	47.7	14.3	0.0	0.0
<b>Total</b>	<b>78</b>	<b>368</b>	<b>100.0</b>	<b>24.6</b>	<b>24.4</b>	<b>17.2</b>	<b>25.6</b>	<b>18.7</b>	<b>26.9</b>	<b>39.5</b>	<b>23.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2020 ACS; Bank Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

## **Section 14**

# **CRA Public Comments**

No Public Comments to place in the Public File

## Section 15

# Miscellaneous Information