

# **PUBLIC DISCLOSURE**

September 20, 2021

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First Farmers Bank and Trust  
RSSD# 139843

123 North Jefferson Street  
Converse, Indiana 46919

Federal Reserve Bank of Chicago

230 South LaSalle Street  
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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**INSTITUTION’S CRA RATING**

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

**Performance Test Rating Table**

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

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

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

**Summary of Major Factors that Support the Rating**

**Lending Test:**

- Lending levels reflect good responsiveness to assessment area credit needs;
- A high percentage of loans are made inside the bank’s assessment area;
- The geographic distribution of loans reflects adequate penetration throughout the assessment area;
- Distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and businesses and farms of different sizes;
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms;

- The bank makes an adequate level of community development loans; and
- The bank makes limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

**Investment Test:**

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

**Service Test:**

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

## FIRST FARMERS BANK AND TRUST

### DESCRIPTION OF INSTITUTION

First Farmers Bank and Trust (FFBT) is headquartered in Converse, Indiana (IN), with total assets of \$2.3 billion as of June 30, 2021. The bank is a wholly owned subsidiary of First Farmers Financial Corporation, a one-bank holding company also located in Converse, IN.

The bank provides a full range of loan and deposit products and services. The bank continues to be primarily a commercial and agricultural lender. Loan products offered include commercial, agricultural, residential real estate, and consumer loans. Deposit products offered include checking accounts, negotiable order of withdrawal (NOW) accounts, money market accounts, savings accounts, and individual retirement accounts (IRA).

The bank predominately markets itself via radio, television, newspaper, billboards, social media and the bank's website. Marketing efforts cover the bank's entire assessment area and are primarily designed for customer awareness. Services are also accessible to customers 24 hours a day via the bank's website at [www.ffbt.com](http://www.ffbt.com), mobile banking, and through their telephone banking system. Customers can check account balances online, as well as pay bills, transfer money between accounts, and apply for mortgage loan products.

As of June 30, 2021, the bank has a network of 34 branches, including its main office; 31 full-service automated teller machines (ATMs); and six cash-only ATMs. Since the previous examination, the bank opened six and closed six branches, with three of the opened branches and four of the closed branches resulting from consolidations/relocations. Of the six opened branches, one was in a moderate-income tract, three were in middle-income tracts, and two were in upper-income tracts. Of the six closed branches, one was in a moderate-income tract, three in a middle-income tract, and two were located in upper-income tracts. Additionally, the bank opened a branch at Peru North on August 9, 2021. Although this branch was opened before the start of this examination, it will not be included or discussed in this evaluation due to how recently it was opened.

The table below presents the assessment area branch locations by city, state, and income tract designation.

City	State	Income Tract
<b>Danville, IL MSA</b>		
Oakwood	IL	Middle
Hoopeston	IL	Upper
<b>Illinois Non-MSA</b>		
Paris	IL	Moderate
Chrisman	IL	Middle
Oakland	IL	Middle
<b>Indiana Non-MSA</b>		
Knox	IN	Moderate
Converse	IN	Middle
Culver	IN	Middle
Fairmont	IN	Middle
Galveston	IN	Middle
Huntington	IN	Middle
Logansport	IN	Middle
Marion	IN	Middle
North Judson	IN	Middle
Peru	IN	Middle
Peru	IN	Middle
Tipton	IN	Middle
Wabash	IN	Middle
<b>Kokomo, IN MSA</b>		
Kokomo	IN	Moderate
Kokomo	IN	Moderate
Greentown	IN	Middle
Kokomo	IN	Middle
Kokomo	IN	Middle
Russiaville	IN	Upper
<b>Lafayette-West Lafayette, IN MSA</b>		
Lafayette	IN	Moderate
Flora	IN	Middle
<b>Terre Haute, IN MSA</b>		
Brazil	IN	Moderate
Clay City	IN	Middle
Sullivan	IN	Middle
Terre Haute	IN	Middle
Terre Haute	IN	Upper
<b>Indianapolis-Carmel-Anderson, IN MSA</b>		
Cicero	IN	Middle
Elwood	IN	Middle
Sheridan	IN	Upper

According to the June 30, 2021 Uniform Bank Performance Report (UBPR), commercial loans accounted for the majority of the bank's loan portfolio at 55.2 percent, followed by agricultural and

residential real estate loans at 32.7 and 7.6 percent; respectively. The following table provides a detailed distribution of the bank's loan portfolio as of June 30, 2021.

<b>Loan Portfolio Composition</b>		
<b>Product</b>	<b>6/30/2021 \$(000s)</b>	<b>% of Loan Portfolio</b>
Commercial Loans	902,525	55.2
Agricultural Loans	533,990	32.7
Residential Real Estate Loans	124,058	7.6
Consumer Loans	18,719	1.1
Other Loans	55,982	3.4
Total Loans	1,635,274	100.0
Note: Percentages may not add to 100.0 percent due to rounding.		

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

At its previous evaluation conducted on September 25, 2017, the bank was rated **Satisfactory** under the CRA.

#### **SCOPE OF THE EXAMINATION**

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

Since the previous examination the bank has removed the Illinois North Non-Metropolitan Statistical Area (Non-MSA) assessment area that was made up of Iroquois County. This area was removed from the bank's assessment area given the bank has no branch presence in the county and very limited lending.



The bank delineates seven assessment areas, including four Metropolitan Statistical Areas (MSAs) and one non-MSA located in the state of Indiana, and one MSA and one Non-MSA in the state of Illinois. Descriptions of the assessment areas follow where counties are taken in their entirety (unless noted otherwise):

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

Assessment areas reviewed for full scope evaluations were selected based on the branch distribution, percentage of total deposits, distribution of loans, and when an assessment area was last subject to a full-scope review. The bank's operations, as well as deposits and lending activity, are predominantly located in the Indiana Non-MSA assessment area, thus, the performance in the Indiana Non-MSA carried the greatest weight in the analysis and overall performance conclusions. The chart below identifies those assessment areas selected for either a full or limited review for purposes of this evaluation:

Assessment Areas Includes Descriptions for Non-MSAs and When Full MSAs are Not Taken	Designation
<b>Full Scope</b>	
Indiana Non-MSA	IN Non-MSA
Indianapolis-Carmel-Anderson IN MSA #26900	Indianapolis MSA
Kokomo, IN MSA #29020	Kokomo MSA
Danville, IL MSA #19180	Danville MSA
<b>Limited Scope Review</b>	
Illinois Non-MSA	IL Non-MSA
Terre Haute, IN MSA #45460	Terre Haute MSA
Lafayette-West Lafayette IN MSA #29200	Lafayette MSA

The lending analysis was based primarily on the bank’s 2020 and 2019 Home Mortgage Disclosure Act (HMDA) and 2019 CRA-reportable loans. While residential real estate lending is a material product line, the loan category is not as significant to the bank’s business model as agricultural and small business loans and received less weight in the analysis. Please refer to Appendix B for 2019 HMDA-Reportable Loan tables.

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

- **Level of Lending Activity:** HMDA-reportable loans originated from January 1, 2019 through December 31, 2020, and CRA-reportable small business and small farm loans originated from January 1, 2019 through December 31, 2019, were reviewed to determine the responsiveness to credit needs in the assessment areas;
- **Lending in the Assessment Area:** HMDA-reportable loans originated from January 1, 2019 through December 31, 2020, and CRA-reportable small business and small farm loans originated from January 1, 2019 through December 31, 2019, were reviewed to determine the percentage of loans originated inside the assessment areas;
- **Geographic Distribution of Lending in the Assessment Area:** HMDA-reportable loans originated from January 1, 2019 through December 31, 2020, and CRA-reportable small business and small farm loans originated from January 1, 2019 through December 31, 2019, were analyzed to determine the extent to which the bank makes loans in census tracts of different income levels, including those designated as low- or moderate-income;
- **Lending to Borrowers of Different Incomes and to Businesses and Farms of Different Sizes:** HMDA-reportable loans originated from January 1, 2019 through December 31, 2020, and CRA-reportable small business and small farm loans originated from January 1, 2019 through December 31, 2019, were analyzed to determine the distribution among borrowers of different income and businesses and farms of different revenue levels;

- **Community Development Lending:** The number and dollar volume of community development loans originated from September 26, 2017 through September 20, 2021, were reviewed;
- **Innovative or Flexible Lending Practices:** The degree to which the bank uses innovative and flexible lending practices to address the credit needs of low- and moderate-income individuals or geographies and small businesses and farms was assessed;
- **Investments:** Qualified investments, grants, and donations made between September 26, 2017 through September 20, 2021, were reviewed to determine the bank's responsiveness to community development investment needs. Qualified investments were also evaluated to determine the bank's use of innovative or complex investments; and
- **Services:** The distribution of the bank's branch offices, banking services, hours of operation, availability of loan and deposit products, and the extent and innovativeness of community development services undertaken from September 26, 2017 through September 20, 2021, were reviewed.

### **Community Representatives**

In addition, eight community representatives were contacted in connection with this examination to provide information regarding local economic and socio-economic conditions in the assessment area. The following types of organizations were contacted: affordable housing, economic development, and small business-related.

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

### **LENDING TEST**

FFBT's performance relative to the lending test is rated high satisfactory based on its performance across Indiana and Illinois. Lending activity reflects good responsiveness to the credit needs of the assessment areas, taking into account the number and amount of home mortgage, small business, and small farm loans in the assessment areas. A high percentage of loans are made in the assessment area. FFBT demonstrates an adequate geographic distribution of loans in its assessment area and has good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank exhibits a good record of serving the credit needs of highly economically disadvantaged areas in the assessment area and low- and moderate-income individuals.

The bank makes limited use of innovative and flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals and geographies. Finally, the bank makes an adequate level of community development loans. Please refer to each full review assessment area discussion for more details.

### Level of Lending Activity

The bank’s lending levels reflect good responsiveness to credit needs in its assessment area, taking into account the number and amount of home mortgage, small business, and small farm loans in its assessment area. The data reflects HMDA reporting for the years 2019 and 2020 and CRA reporting for 2019. Since the prior evaluation, the bank increased focus on commercial lending, and this loan type now comprises the largest portion of the bank’s portfolio by dollar and by originations. When adjusted on a month-by-month basis to account for the different lengths of review periods, lending activity has increased 4.2 percent by number and 21.8 percent by dollar since the previous evaluation showing the bank’s commitment to serve the credit needs of the area they serve.

The following table provides a summary of FFBT’s lending during the review period.

<b>Summary of Lending Activity</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000)</b>	<b>%</b>
Home Purchase	687	20.7	96,754	17.6
Home Refinance	993	29.9	152,400	27.7
Multi-Family Housing	22	0.7	20,044	3.6
Home Improvement	35	1.1	3,810	0.7
Loan Purpose NA	27	0.8	16,338	3.0
<b>Total HMDA-Related</b>	<b>1,764</b>	<b>53.1</b>	<b>289,346</b>	<b>52.7</b>
<b>Total Small Business-Related</b>	<b>574</b>	<b>17.3</b>	<b>103,545</b>	<b>18.8</b>
<b>Total Small Farm-Related</b>	<b>985</b>	<b>29.6</b>	<b>156,422</b>	<b>28.5</b>
<b>Total Loans</b>	<b>3,323</b>	<b>100.0</b>	<b>549,313</b>	<b>100.0</b>
<i>Note: Percentages may not add up to 100.0 percent due to rounding</i>				

### Assessment Area Concentration

A high percentage of loans are made in the bank’s assessment area. Specifically, the bank originated 86.7 percent of its total loans by number, and 82.7 percent by dollar volume, inside the designated assessment areas. Of the 1,764 home mortgage loans originated during the evaluation period, 89.6 percent of loans by number and 85.7 percent by dollar amount were originated in the assessment areas. Similarly, the bank originated 90.8 and 79.2 percent of small business and small farm loans, respectively, in its assessment areas. These numbers are comparable to the bank’s assessment area loan concentrations from the previous evaluation, where overall loans by number were at 84.6 percent and overall dollar at 81.3 percent. Overall, lending inside the assessment areas indicates the bank is actively responding to the credit needs of individuals, families, and business and farm owners in the communities it serves. The following table provides a breakdown of loan

originations by product type both inside and outside the assessment area during the review period.

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	31	88.6	3,322	87.2	4	11.4	488	12.8
Home Purchase – Conventional	600	87.3	80,654	83.4	87	12.7	16,100	16.6
Multi-family Housing	26	96.3	15,709	96.2	1	3.7	629	3.8
Refinancing	904	91.0	134,583	88.3	89	9.0	17,817	11.7
<b>Total HMDA related</b>	<b>1580</b>	<b>89.6</b>	<b>248,012</b>	<b>85.7</b>	<b>184</b>	<b>10.4</b>	<b>41,334</b>	<b>14.3</b>
<b>Total Small Business</b>	<b>521</b>	<b>90.8</b>	<b>88,494</b>	<b>85.5</b>	<b>53</b>	<b>9.2</b>	<b>15,051</b>	<b>14.5</b>
<b>Total Small Farm</b>	<b>780</b>	<b>79.2</b>	<b>117,850</b>	<b>75.3</b>	<b>205</b>	<b>20.8</b>	<b>38,572</b>	<b>24.7</b>
<b>TOTAL LOANS</b>	<b>2,881</b>	<b>86.7</b>	<b>454,356</b>	<b>82.7</b>	<b>442</b>	<b>13.3</b>	<b>94,957</b>	<b>17.3</b>

### Geographic and Borrower Distribution

The bank’s lending activities reflect adequate distribution throughout the assessment area. Please see the state and full review assessment area summaries for further detail regarding FFBT’s lending performance in comparison to aggregate lending and to the percentage of owner-occupied units, small businesses, or small farms in low- and moderate-income census tracts.

The bank’s lending activities reflect good distribution, particularly in its assessment areas, of loans to individuals of different income levels and businesses and farms of different sizes, given the products offered by the bank. Please see the state and full review assessment area summaries for further detail regarding the bank’s lending performance.

FFBT exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment areas, low-income individuals, or businesses (including farms) with gross annual revenues of \$1.0 million or less, consistent with safe and sound operations.

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

## Community Development Lending

The bank makes an adequate level of community development loans. During the review period, the bank originated a total of 78 loans for approximately \$74.7 million. This includes 64 loans totaling approximately \$54.0 million in the state of Indiana, and 11 loans totaling approximately \$11.1 million in the state of Illinois. When comparing loans by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation the increase in dollar volume by monthly average was 194.4 percent. Community development loans were made in all seven of the bank's assessment areas and to various businesses and community service organizations. An additional three loans were made outside of the assessment areas, but benefitted the broader statewide or regional area (BSRA), which includes the bank's assessment area. Please see each full review assessment area for more details regarding the responsiveness of such activity towards the communities served within FFBT's assessment area.

Qualified Community Development Loans by Purpose September 26, 2017 - September 20, 2021										
	Affordable Housing		Economic Development		Revitalization & Stabilization		Community Services		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Indiana Non-MSA	9	3,810	24	16,941	0	0	13	4,707	46	25,458
Indianapolis-Carmel-Anderson IN MSA #26900	0	0	4	2,005	0	0	0	0	4	2,005
Kokomo, IN MSA #29020	1	75	1	146	0	0	4	549	6	770
Danville, IL MSA #19180	2	96	0	0	0	0	1	1,280	3	1,376
Illinois Non-MSA	0	0	2	890	0	0	6	8,841	8	9,731
Terre Haute, IN MSA #45460	1	300	2	1,140	4	24,000	0	0	7	25,440
Lafayette-West Lafayette IN MSA #29200	0	0	1	300	0	0	0	0	1	300
State of Indiana BSRA	1	2,310	1	2,624	0	0	1	4,700	3	9,634
<b>Total</b>	<b>14</b>	<b>6,591</b>	<b>35</b>	<b>24,046</b>	<b>4</b>	<b>24,000</b>	<b>25</b>	<b>20,077</b>	<b>78</b>	<b>74,714</b>

## INVESTMENT TEST

FFBT's performance relative to the Investment Test is Low Satisfactory. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position.

The bank made a total of nine investments worth approximately \$7.0 million during the evaluation period, including newly disbursed and prior period investments. When comparing investments by the 25-month time period of the previous evaluation period and the 48-month time period of the current evaluation, there was a decrease of 53.8 percent by dollar per monthly average. The majority of these investments, approximately \$5.9 million, were made in the IN Non-MSA. The bank made occasional use of innovative or complex investments and demonstrated adequate responsiveness to its communities. Please see the full review assessment area analysis for more detail.

Qualified Community Development Investments September 26, 2017 - September 20, 2021										
	Affordable Housing		Economic Development		Revitalization & Stabilization		Community Services		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
IN Non-MSA	2	5,029	1	617	0	0	1	250	4	5,896
Indianapolis MSA	2	71	1	803	0	0	0	0	3	874
Kokomo MSA	0	0	0	0	0	0	1	25	1	25
Danville MSA	1	170	0	0	0	0	0	0	1	170
IL Non-MSA	0	0	0	0	0	0	0	0	0	0
Terre Haute MSA	0	0	0	0	0	0	0	0	0	0
Lafayette MSA	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>5</b>	<b>5270</b>	<b>2</b>	<b>1420</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>275</b>	<b>9</b>	<b>6,965</b>

The bank's performance with respect to investments also includes its donations and grants to organizations involved in community development activities that benefit the combined assessment area. During the evaluation period, the bank made 153 such donations for \$415,857. When comparing grants and donations by the 25-month time period of the previous examination and the 48-month period of the current evaluation, the increase by monthly average was 50.9 percent. Donations were responsive to assessment area needs. Please see the full review assessment area analyses for more detail.

## **SERVICE TEST**

FFBT's performance relative to the Service Test is High Satisfactory. The bank's delivery systems are accessible to all portions of the bank's assessment areas, including low- and moderate-income individuals and geographies. The bank has opened and closed offices, as well as ATMs in the assessment area, but the closures did not adversely affect the accessibility of its delivery systems. The bank's services do not vary in a way that inconveniences its assessment areas, particularly low- or moderate-income geographies or low- or moderate-income individuals. Finally, the bank provided an adequate level of community development services within its assessment areas.

### **Retail Services**

The bank's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. The bank has a network of 34 branch locations, including its main office; 31 full-service ATMs; and six cash-only ATMs. Its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Since the previous examination the bank opened six and closed six branches, with three of the opened branches and four of the closed branches resulting from consolidations/relocations. Of the six opened branches, one was in a moderate-income tract, three were in middle-income tracts, and two in upper-income tracts. Of the six closed branches, one was in a moderate-income tract, three in a middle income-tract, and two were located in upper-income tracts.

Business hours and banking services do not vary in a way that inconveniences the bank's assessment areas, particularly low- or moderate-income geographies or low- or moderate-income individuals. Office hours are typically 9:00 a.m. to 4:00 p.m., Monday through Friday. Twenty-nine locations also provide drive-up services with 25 locations having extended hours and services on Saturdays. Applications for all loan and deposit products are accepted at each location. Additionally, mortgage applications are accepted online through the bank's website.

### **Community Development Services**

The bank provides an adequate level of community development services. During the evaluation period, the bank contributed 5,370 hours of financial service to area organizations. When comparing service hours by the 25-month time period for the previous examination period and the 48-month time period of the current evaluation, the bank number of hours decreased 10.8 percent by monthly average. The majority of the hours occurred within the IN Non-MSA, where the bank contributed 3,131 hours. The bank's primary levels of service were related to financial education, board membership where staff contributed its financial expertise, and technical assistance which included assisting low- and moderate-income borrowers in their applications for home purchase down payment and closing cost assistance. The services provided are responsive to the needs of the assessment areas in which the bank operates. Please refer to the individual assessment area



sections of the evaluation for further details. The following table provides an overview summary of each of the assessment areas.

<b>Qualified Community Development Service Hours September 26, 2017 - September 20, 2021</b>										
	<b>Affordable Housing</b>		<b>Economic Development</b>		<b>Revitalization &amp; Stabilization</b>		<b>Community Services</b>		<b>Total</b>	
	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>
<b>IN Non-MSA</b>	9	384	10	312	0	0	98	2,435	117	3,131
<b>Indianapolis MSA</b>	0	0	0	0	0	0	2	3	2	3
<b>Kokomo MSA</b>	2	264	3	152	0	0	22	609	27	1,025
<b>Danville MSA</b>	0	0	0	0	0	0	6	216	6	216
<b>IL Non-MSA</b>	0	0	1	120	0	0	2	168	3	288
<b>Terre Haute MSA</b>	0	0	0	0	0	0	10	351	10	351
<b>Lafayette MSA</b>	0	0	2	48	0	0	6	308	8	356
<b>Total</b>	<b>11</b>	<b>648</b>	<b>16</b>	<b>632</b>	<b>0</b>	<b>0</b>	<b>146</b>	<b>4,090</b>	<b>173</b>	<b>5,370</b>

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

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

## STATE OF INDIANA

### **CRA RATING FOR INDIANA: Satisfactory**

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

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

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

#### **Lending Test:**

- Geographic distribution of loans reflects adequate penetration throughout the assessment area;
- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and businesses and farms of different sizes;
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms;
- The bank makes limited use of innovative and/or flexible lending practices in serving assessment area credit needs; and
- The bank makes an adequate level of community development loans.

#### **Investment Test:**

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

#### **Service Test:**

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

## SCOPE OF EXAMINATION

Performance within the state of Indiana was evaluated using full review examination procedures for the Indiana Non-MSA, Kokomo, IN MSA #29020, and the Indianapolis-Carmel-Anderson, IN MSA #26900 assessment areas. Limited review procedures were used to evaluate the Lafayette-West Lafayette, IN MSA #29200 and Terre Haute, IN MSA #45460, given the bank's limited presence in those areas. The scope of the examination is consistent with that which is defined for the whole review.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN INDIANA

FFBT maintains operations in the state of Indiana through 29 offices and 33 ATMs, including the main office headquartered in Converse, Indiana. The bank operates in five individual assessment areas within the state including the following: Indianapolis-Carmel-Anderson, Indiana MSA #26900; Kokomo, Indiana MSA #29020; Indiana Non-MSA; Terre Haute, Indiana MSA #45460; and Lafayette-West Lafayette, Indiana MSA #29200. Information regarding relevant demographic and economic conditions is discussed under each individual assessment area.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

### LENDING TEST

FFBT's performance relative to the Lending Test in the state of Indiana is High Satisfactory. The rating is primarily attributed to the bank's performance in the IN Non-MSA, Kokomo MSA, and Indianapolis MSA due to the branching network of these areas and overall lending presence.

### Geographic Distribution of Loans

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

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

The bank's lending activities reflect good distribution, particularly in its assessment areas, of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank. In most instances, the bank outperformed the aggregate of lenders in the state who lend to small businesses and small farm loans reporting annual revenues of \$1.0 million or less.

The bank exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment areas, low-income individuals, or businesses (including farms) with gross annual revenues of \$1.0 million or less, consistent with safe and sound operations.

The bank makes limited use of innovative or flexible lending practices, in a safe and sound manner, to address the credit needs of low- or moderate-income individuals or geographies. The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

### Community Development Lending

The bank makes an adequate level of community development loans. The bank made 67 loans totaling approximately \$63.6 million. When comparing loans by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the increase in dollar volume by monthly average was 292.7 percent. Of the loans made, \$25.5 million were in the IN Non-MSA and \$25.4 million in the Terre Haute MSA assessment area. Most loans were for economic development at 33 loans, with 24 loans for economic development being made in the IN Non-MSA. Please refer to the individual assessment area summaries for more information.

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

<b>Qualified Community Development Loans by Purpose September 26, 2017 - September 20, 2021</b>										
	<b>Affordable Housing</b>		<b>Economic Development</b>		<b>Revitalization &amp; Stabilization</b>		<b>Community Services</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
<b>Indiana Non-MSA</b>	9	3,810	24	16,941	0	0	13	4,707	<b>46</b>	<b>25,458</b>
<b>Indianapolis-Carmel-Anderson IN MSA #26900</b>	0	0	4	2,005	0	0	0	0	<b>4</b>	<b>2,005</b>
<b>Kokomo, IN MSA #29020</b>	1	75	1	146	0	0	4	549	<b>6</b>	<b>770</b>
<b>Terre Haute, IN MSA #45460</b>	1	300	2	1,140	4	24,000	0	0	<b>7</b>	<b>25,440</b>
<b>Lafayette-West Lafayette IN MSA #29200</b>	0	0	1	300	0	0	0	0	<b>1</b>	<b>300</b>
<b>State of Indiana BSRA</b>	1	2,310	1	2,624	0	0	1	4,700	<b>3</b>	<b>9,634</b>
<b>Total</b>	<b>12</b>	<b>6,495</b>	<b>33</b>	<b>23,156</b>	<b>4</b>	<b>24,000</b>	<b>18</b>	<b>9,956</b>	<b>67</b>	<b>63,607</b>

## INVESTMENT TEST

FFBT's performance relative to the Investment Test in the state of Indiana is Low Satisfactory. The bank makes an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. FFBT had approximately \$6.8 million in both prior and current period investments. A majority of the investments, \$6.7 million, were current period investments, with only approximately \$100,000 of investments carrying over from the previous evaluation. As of the evaluation, \$3.8 million of the total investments remained unfunded. When comparing investments by the 25-month time period of the previous evaluation and the 48-month period of the current evaluation, there was a decrease of 48.6 percent by dollar on monthly average. The bank's investments were primarily to support affordable housing. Of the total amount, \$5.9 million or 86.8 percent were made in the IN Non-MSA. Please see the individual assessment area summaries for further details.

The bank makes occasional use of innovative and/or complex investments to support community initiatives. The bank demonstrates adequate responsiveness to credit and community development needs.

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

Qualified Community Development Investments by Purpose September 26, 2017 - September 20, 2021								
State of Indiana	Prior Period Investments		Current Period Investments		Total Investments		Unfunded Commitments	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000)
Affordable Housing	3	100	1	5,000	4	5,100	1	3,598
Economic Development	0	0	2	1,419	2	1,419	1	178
Revitalization & Stabilization	0	0	0	0	0	0	0	0
Community Services	0	0	2	275	2	275	0	0
<b>Total</b>	<b>3</b>	<b>100</b>	<b>5</b>	<b>6,694</b>	<b>8</b>	<b>6,794</b>	<b>2</b>	<b>3,776</b>
<i>Note: Percentages may not add to 100.0 percent due to rounding.</i>								

FFBT made 129 donations totaling approximately \$375,000 in the state of Indiana during the evaluation period. When comparing the dollar amount of grants and donations by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the increase by monthly average was 76.6 percent. The majority of the donations were for community service. Of the total amount, 44 by number and approximately \$164,000 by dollar went to support the IN Non-MSA assessment area. Please see the assessment area summaries for further details.

The table below presents qualified community development donations in the state of Indiana during the evaluation period.

Qualified Community Development Donations by Purpose September 26, 2017 - September 20, 2021											
State of Indiana	Affordable Housing		Economic Development		Revitalization & Stabilization		Community Services		Total		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$(000s)
	3	16	0	0	0	0	126	359	129	375	70.4

### SERVICE TEST

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

### Retail Services

The bank’s retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. Its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. The bank maintains 29 full-service branch locations, including the main office, inside the combined assessment areas in the state of Indiana. Since the previous evaluation, the bank has closed two branches in middle-income tracts, and opened one branch in a moderate-income tract and three branches in middle-income tracts. This has improved branch access to moderate-income geographies in the assessment area.

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

### Community Development Services

The bank provides a relatively high level of community development services. FFBT provided 4,866 hours of qualified services in the state of Indiana during the evaluation period, 3,131 of which were provide to the IN Non-MSA assessment area. Statewide the community development services increased by 2,524 hours from the previous examination. When comparing service hours by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the increase by monthly average was 8.2 percent. The majority of hours took place in the IN Non-MSA and Kokomo MSA assessment areas, which is consistent with the office network and market presence in these areas. Services provided included board and committee membership on non-profit organizations, financial education, and consultation and advisory services. The extent of the bank’s involvement reflects responsiveness to the variety of needs in the assessment area. Please refer to the individual assessment areas for more information.

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

<b>Qualified Community Development Services September 26, 2017 - September 20, 2021</b>										
<b>State of Indiana</b>	<b>Affordable Housing</b>		<b>Economic Development</b>		<b>Revitalization &amp; Stabilization</b>		<b>Community Services</b>		<b>Total</b>	
	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>
<b>IN Non-MSA</b>	9	384	10	312	0	0	98	2,435	117	3,131
<b>Indianapolis MSA</b>	0	0	0	0	0	0	2	3	2	3
<b>Kokomo MSA</b>	2	264	3	152	0	0	22	609	27	1,025
<b>Terre Haute MSA</b>	0	0	0	0	0	0	10	351	10	351
<b>Lafayette MSA</b>	0	0	2	48	0	0	6	308	8	356
<b>Total</b>	<b>11</b>	<b>648</b>	<b>15</b>	<b>512</b>	<b>0</b>	<b>0</b>	<b>137</b>	<b>4,108</b>	<b>164</b>	<b>4,866</b>

## INDIANA NON-MSA – Full Review

### SCOPE OF THE EXAMINATION

FFBT’s operations in the Indiana Non-MSA received a full scope review. The scope for this assessment area is consistent with the scope of examination presented in the overall section of the Performance Evaluation. Please see the detailed description of the scope contained in the introduction section.

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

The IN Non-MSA assessment area includes Cass, Fulton, Grant, Huntington, Miami, Pulaski, Starke, Tipton, Clinton, and Wabash Counties in their entireties and a majority of Marshall County. The bank excluded four census tracts in the northern portion of Marshall County, bordering St. Joseph County, from the assessment area. The assessment area remains unchanged since the last examination.

The assessment area includes 91 census tracts comprised of 21 moderate-, 63 middle-, and seven upper-income census tracts. There are no low-income census tracts in the assessment area. According to the FFIEC, as of 2020, the assessment area does not contain any census tracts that are designated as distressed or underserved.

In addition to its main office in Converse, Indiana, the bank operates 12 full-service branches and 11 full-service and four cash-only ATMs in the assessment area. The following table is a summary of the bank’s branch locations within the IN Non-MSA assessment area.

<b>First Farmers Bank and Trust Branch Locations By Census Tract Income Level (December 31, 2020)</b>				
Tract Income Level	Number of Branches	Percent of Branches	Number of ATMs	Percent of ATMs
Low	0	0.0	0	0.0
Moderate	1	7.7	1	6.7
Middle	12	92.3	14	93.3
Upper	0	0.0	0	0.0
Unknown	0	0.0	0	0.0
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>

The Federal Deposit Insurance Corporation’s (FDIC) Deposit Market Share Report dated June 30, 2020, ranks FFBT first among the 29 FDIC-insured institutions in the assessment area. The bank has a 12.4 percent deposit market share, followed by 1st Source Bank, which has a 9.9 percent share. Based on the HMDA Market Peer Report for 2020, FFBT ranks sixth in loan originations out of 339 HMDA reporters, with a total of 484 originations compared to 1,276 loans reported by first-ranked Ruoff Mortgage Company. The CRA Market Peer Report ranks FFBT first out of 79 reporters with



722 CRA-reportable loans in 2019; the second ranked institution, JP Morgan Chase, originated 643. FFBT is a leader in the assessment area among its market peers with respect to deposits and loans.

The following table presents demographic data specific to the institution's IN Non-MSA assessment area.

*The following presentation of key demographics used to help inform the evaluation of bank activity in its assessment area is based on a comparison of two sets of ACS data, 2006-2010 and 2011-2015.*

Assessment Area: 2020 IN Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	17,866	19.7
Moderate-income	21	23.1	17,432	19.2	3,490	20.0	17,667	19.5
Middle-income	63	69.2	64,421	71.1	6,081	9.4	20,770	22.9
Upper-income	7	7.7	8,723	9.6	574	6.6	34,273	37.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>91</b>	<b>100.0</b>	<b>90,576</b>	<b>100.0</b>	<b>10,145</b>	<b>11.2</b>	<b>90,576</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	33,963	17,396	17.6	51.2	11,275	33.2	5,292	15.6
Middle-income	105,903	71,665	72.5	67.7	21,205	20.0	13,033	12.3
Upper-income	12,647	9,847	10.0	77.9	1,685	13.3	1,115	8.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>152,513</b>	<b>98,908</b>	<b>100.0</b>	<b>64.9</b>	<b>34,165</b>	<b>22.4</b>	<b>19,440</b>	<b>12.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	3,096	25.8	2,754	25.4	307	32.1	35	16.1
Middle-income	7,782	64.8	7,053	65.0	570	59.6	159	73.3
Upper-income	1,139	9.5	1,037	9.6	79	8.3	23	10.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>12,017</b>	<b>100.0</b>	<b>10,844</b>	<b>100.0</b>	<b>956</b>	<b>100.0</b>	<b>217</b>	<b>100.0</b>
		Percentage of Total Businesses:		90.2		8.0		1.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	16	1.2	16	1.2	0	0.0	0	0.0
Middle-income	1,152	83.1	1,135	83.2	16	76.2	1	100.0
Upper-income	218	15.7	213	15.6	5	23.8	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>1,386</b>	<b>100.0</b>	<b>1,364</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
		Percentage of Total Farms:		98.4		1.5		0.1

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

## Population Characteristics

As presented in the table below, population changes have been relatively consistent throughout the assessment area from 2010 to 2015. The largest counties within the assessment area by population are Grant County, Marshall County, and Cass County, respectively. All the counties in the assessment area experienced slight population decreases from 2010 to 2015, with Pulaski County having the largest population decrease of 2.7 percent. Meanwhile, the state of Indiana had an overall population increase of 1.3 percent from 2010 to 2015.

Community representatives indicated that the population in the counties decreased due to a lack of career opportunities as many of the communities are very rural. One contact also stated that there were high local taxes that have driven people out of the area as they did not see a return in services for their tax dollars.

IN Non MSA Population Change			
Area	2010 Population	2015 Population	Percent Change (%)
Cass County, IN	38,966	38,476	-1.3
Clinton County, IN	33,224	32,835	-1.2
Fulton County, IN	20,836	20,527	-1.5
Grant County, IN	70,061	68,896	-1.7
Huntington County, IN	37,124	36,863	-0.7
Marshall County, IN	47,051	46,962	-0.2
Miami County, IN	36,903	36,211	-1.9
Pulaski County, IN	13,402	13,047	-2.7
Starke County, IN	23,363	23,117	-1.1
Tipton County, IN	15,936	15,573	-2.3
Wabash County, IN	32,888	32,358	-1.6
Non MSA Indiana	1,481,934	1,475,951	-0.4
Indiana	6,483,802	6,568,645	1.3

Source: 2010 U.S. Census Bureau Decennial Census  
2011 - 2015 U.S. Census Bureau American Community Survey

## Income Characteristics

Median family income (MFI) saw an overall decrease in IN Non-MSA and the state as a whole from the periods of 2010 to 2015. Tipton County experienced the largest decrease at 10.9 percent from 2010 to 2015, which is more than double the decrease of the state of Indiana. Three counties experienced an increase in MFI; Fulton, Miami, and Starke Counties. The only county remaining with less than a 2.0 percent decrease in median family income was Cass County, with a decrease of 1.9 percent. A community representative noted that the state of Indiana has been aggressively pursuing businesses to move to Indiana from neighboring states, but many of the accompanying jobs have been low-paying manufacturing jobs.

Overall, 19.7 percent of families in the assessment area are designated as low-income, and 19.5 percent are moderate-income, both of which are consistent with the state of Indiana at 20.7 and 17.7 percent respectively. Grant County has the highest percentage of families designated as low-income at 24.3 percent, while Starke County has the highest percentage of moderate-income at 22.6 percent. The highest percentage of families below poverty was in Grant County at 14.8 percent, Starke County at 11.8 percent, and Cass County at 11.7 percent. These percentages are slightly higher than the poverty levels in the overall assessment area and the state of Indiana at 11.2 percent and 11.1 percent, respectively.

IN Non MSA Median Family Income Change			
Area	2010 Median Family Income (\$)	2015 Median Family Income (\$)	Percent Change (%)
Cass County, IN	54,309	53,307	-1.9
Clinton County, IN	62,555	58,546	-6.4
Fulton County, IN	52,239	54,405	4.2
Grant County, IN	54,295	49,160	-9.5
Huntington County, IN	60,578	57,244	-5.5
Marshall County, IN	63,178	59,601	-5.7
Miami County, IN	53,666	56,328	5.0
Pulaski County, IN	55,431	51,345	-7.4
Starke County, IN	47,962	50,072	4.4
Tipton County, IN	66,551	59,286	-10.9
Wabash County, IN	57,451	53,104	-7.6
Non MSA Indiana	57,143	55,715	-2.5
Indiana	64,187	61,119	-4.8

Source: 2006 - 2010 U.S. Census Bureau American Community Survey  
2011 - 2015 U.S. Census Bureau American Community Survey  
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

### Housing Characteristics

The assessment area has 152,513 housing units, of which 64.9 percent are owner-occupied, 22.4 percent are rental units, and 12.7 percent are vacant. There are a total of 98,908 owner-occupied housing units in the assessment area, of which 17,396 (17.6 percent) are located in moderate-income tracts.

A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix D. A higher ratio supports more affordable housing opportunities. Based on the 2006-2010 American Community Survey data, the IN Non-MSA (0.48) was more affordable than the state of Indiana (0.40).

The chart below depicts housing cost burden in the counties that make up the assessment area and in the state of Indiana. Renters and homeowners are considered overburdened when housing costs equal 30.0 percent or more of household income. Across IN Non-MSA, 37.0 percent of all renters are considered overburdened, including 69.0 percent of low-income renters and 26.0 percent of

moderate-income renters. These numbers are lower than the burden experienced across renters statewide. Conversely, only 17.0 percent of homeowners in the IN Non-MSA assessment area experience housing cost burden, including 57.0 percent of low-income owners and 27.0 percent of moderate-income owners. Again, these numbers are slightly lower than those at the state level. This indicates that the less income a person has, the higher percentage of their total income they spend on housing. Community representatives indicated that much of the assessment area is very poor and that affordable housing needs are not being met.

IN Non MSA Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Cass County, IN	76.0	18.0	38.0	59.0	25.0	17.0
Clinton County, IN	74.0	30.0	36.0	66.0	27.0	18.0
Fulton County, IN	76.0	15.0	38.0	67.0	21.0	19.0
Grant County, IN	66.0	28.0	38.0	57.0	22.0	16.0
Huntington County, IN	83.0	22.0	41.0	62.0	27.0	18.0
Marshall County, IN	73.0	29.0	38.0	57.0	27.0	18.0
Miami County, IN	71.0	32.0	37.0	53.0	20.0	16.0
Pulaski County, IN	66.0	20.0	33.0	61.0	42.0	22.0
Starke County, IN	58.0	19.0	30.0	69.0	33.0	23.0
Tipton County, IN	68.0	24.0	36.0	65.0	27.0	14.0
Wabash County, IN	72.0	24.0	38.0	46.0	25.0	13.0
Non MSA Indiana	69.0	26.0	37.0	57.0	27.0	17.0
Indiana	75.0	34.0	44.0	61.0	31.0	18.0

*Cost Burden is housing cost that equals 30 percent or more of household income*

*Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy*

## Employment Conditions

The table below presents employment characteristics between 2015 and 2020 in the counties that comprise the IN Non-MSA assessment area. Overall, the unemployment rates in the assessment area and the state of Indiana have declined from 2015 to 2019; however, in 2020, unemployment rates increased due to the COVID-19 pandemic. Based on Local Area Unemployment Statistics provided by the Bureau of Labor Statistics, unemployment rates were comparable across all counties in the assessment area and the state of Indiana from 2015 to 2020.

Community representatives commented that the economy has been rebounding since 2020 and the impacts of the COVID-19 pandemic; however, businesses continue to have challenges in finding employees.

IN Non MSA Unemployment Rates (%)						
Area	2015	2016	2017	2018	2019	2020
Cass County, IN	4.6	4.6	3.8	3.6	3.4	6.8
Clinton County, IN	4.0	3.8	3.0	2.8	2.6	5.6
Fulton County, IN	4.8	4.6	3.4	3.3	3.1	6.6
Grant County, IN	5.4	4.9	3.8	3.8	3.6	6.3
Huntington County, IN	4.4	4.0	3.5	3.5	3.2	6.6
Marshall County, IN	4.1	3.7	3.0	3.1	3.0	6.4
Miami County, IN	5.2	4.7	3.9	3.9	3.8	8.2
Pulaski County, IN	4.5	4.4	3.4	3.0	3.0	6.1
Starke County, IN	5.9	5.3	4.3	4.3	4.2	8.1
Tipton County, IN	4.0	3.8	3.0	2.7	2.6	6.1
Wabash County, IN	4.8	4.2	3.4	3.4	3.0	6.1
Non MSA Indiana	4.6	4.2	3.4	3.2	3.0	6.5
Indiana	4.8	4.4	3.5	3.4	3.2	7.1

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

### Community Contact Data

Two community representatives, with a focus on affordable housing and economic development, were contacted to increase understanding of the credit needs and market conditions within the assessment area. One representative noted extensive needs for affordable housing, financial education, and community services in the area. Another contact discussed the lack of career opportunities in the assessment area, which has led to many in the communities to leave the area.

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

#### LENDING TEST

The bank displays an adequate geographic distribution of loans in the assessment area. FFBT demonstrates a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. FFBT exhibits a good record of serving the credit needs of low-income individuals, or small businesses and farms with gross annual revenues of \$1.0 million or less. The bank demonstrates a limited use of innovative or flexible lending practices, in a safe and sound manner, to address the credit needs of low- and moderate-income individuals and geographies. Further, FFBT has made a relatively high level of community development loans. There will be no discussion of home improvement or multi-family loans as originations were too low for a meaningful analysis to be conducted. Finally, when determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics (percentage of owner-occupied housing units) as it is a better measure of loan demand.

## Geographic Distribution of Loans

The bank's lending activities reflect adequate distribution throughout the assessment area. The bank's assessment area includes 21 moderate-income, 63 middle-income, and seven upper-income census tracts. There are no low-income census tracts in the assessment area.

During the evaluation, there were no conspicuous census tract lending gaps within the assessment area. In 2020, within the 91 census tracts of the assessment area, the bank originated HMDA and CRA loans in 84 of the census tracts, or 92.3 percent, including 90.5 percent of the moderate-income census tracts. This performance showed an improvement over 2019, where the bank originated loans in 74 census tracts, or 81.3 percent, including 61.9 percent of moderate-income tracts. Overall, the dispersion analysis reveals that the bank continues to serve its assessment area.

## HMDA-Reportable Lending

The geographic distribution of HMDA-reportable loans reflects poor penetration throughout the IN Non-MSA assessment area. Overall, the bank's rate of HMDA-reportable lending within moderate-income census tracts was below the rate by the aggregate of lenders and the assessment area demographics. Lending in 2019 was comparable to 2020.

### *Home Purchase Loans*

In 2020, home purchase loans comprised 28.4 percent of HMDA-reportable loans. Home purchase lending within moderate-income tracts (7.3 percent) was below aggregate (18.8 percent) and the percentage of owner-occupied housing (17.6 percent) in moderate-income census tracts. The bank made 89.1 percent of its home purchase loans in middle-income census tracts, which was significantly above aggregate lenders (71.5 percent) and the percentage of owner-occupied housing in middle-income census tracts (72.5 percent). Lastly, the bank made 3.6 percent of its home purchase loans in upper-income census tracts, below the performance of aggregate lenders (9.8 percent) and the percentage of owner-occupied housing in upper-income census tracts (10.0 percent).

### *Refinance Loans*

Refinance loans represent 69.6 percent of the bank's total HMDA-reportable loans in 2020. Lending in moderate-income census tracts (5.7 percent) was slightly below aggregate (9.2 percent) and below the percentage of owner-occupied housing (17.6 percent). Refinance lending in middle-income census tracts (89.0 percent) was above the aggregate (75.4 percent) and significantly above the percentage of owner-occupied housing (72.5 percent). The bank made 5.4 percent of its refinance loans in upper-income census tracts, which was below the performance of aggregate lenders (15.4 percent) and the percentage of owner-occupied housing units (10.0 percent) in those census tracts.

The table below presents the geographic distribution of HMDA-reportable loans in the assessment area in 2020. Please refer to Appendix B for geographic distribution data for HMDA-reportable lending in 2019.



Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2020 IN Non MSA							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2020		2020			
		Count Bank	Agg	Dollar Bank	Agg		
		#	%	%	\$ (000s)	%	%
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	10	7.3	18.8	647	3.3	12.9
	Middle	122	89.1	71.5	18,540	93.3	72.5
	Upper	5	3.6	9.8	675	3.4	12.6
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>137</b>	<b>100.0</b>	<b>100.0</b>	<b>19,862</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	19	5.7	9.2	2,134	4.3	17.6
	Middle	299	89.0	75.4	44,244	88.9	72.5
	Upper	18	5.4	15.4	3,363	6.8	10.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>336</b>	<b>100.0</b>	<b>100.0</b>	<b>49,741</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	9.4	0	0.0	17.6
	Middle	7	100.0	68.7	894	100.0	72.5
	Upper	0	0.0	21.9	0	0.0	10.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>894</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	1	33.3	22.7	1,886	53.7	37.7
	Middle	2	66.7	59.1	1,629	46.3	58.8
	Upper	0	0.0	18.2	0	0.0	3.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>3,515</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	12.4	0	0.0	17.6
	Middle	0	0.0	75.1	0	0.0	72.5
	Upper	0	0.0	12.4	0	0.0	10.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	12.9	0	0.0	17.6
	Middle	0	0.0	74.2	0	0.0	72.5
	Upper	0	0.0	12.9	0	0.0	10.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	25.0	0	0.0	17.6
	Middle	0	0.0	65.5	0	0.0	72.5
	Upper	0	0.0	9.5	0	0.0	10.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	30	6.2	13.3	4,667	6.3	17.6
	Middle	430	89.0	73.4	65,307	88.2	72.5
	Upper	23	4.8	13.2	4,038	5.5	10.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>483</b>	<b>100.0</b>	<b>100.0</b>	<b>74,012</b>	<b>100.0</b>
Originations & Purchases							
2016 FFIEC Census Data							
Note: Percentages may not add to 100.0 percent due to rounding							

### Small Business Lending

The table below indicates adequate distribution of small business loans in the bank’s assessment area when compared to aggregate lenders and the distribution of small businesses in 2019.

Small business lending in moderate-income census tracts (16.5 percent) was below aggregate lenders (23.0 percent) and the percentage of small businesses (25.6 percent) in moderate-income census tracts. The bank made 78.0 percent of its small business loans in middle-income census tracts, which exceeds performance of aggregate lenders (64.0 percent) and the percentage of small businesses (64.7 percent) in middle-income census tracts. Lending in upper-income census tracts (5.5 percent) was below aggregate lenders (10.5 percent) and the percentage of small businesses (9.7 percent) in upper-income census tracts.

Geographic Distribution of Small Business Loans								
Assessment Area: 2019 IN Non MSA								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses %
		2019			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Small Business	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	45	16.5	23.0	9,867	20.4	27.0	25.6
	Middle	213	78.0	64.0	36,433	75.2	65.0	64.7
	Upper	15	5.5	10.5	2,136	4.4	7.5	9.7
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			2.4			0.5	
	Total		273	100.0	100.0	48,436	100.0	100.0
Originations & Purchases 2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

### Small Farm Loans

The table below indicates adequate distribution of small farm loans in the bank’s assessment area when compared to aggregate lenders and the distribution of small farms in 2019.

In 2019, the bank made no small farm loans in moderate-income census tracts, which was comparable to the aggregate of lenders (0.6 percent) and the percentage of small farms (1.0 percent) in moderate-income census tracts. The bank made 82.2 percent of its small farm loans in middle-income census tracts, which is comparable to the performance of aggregate lenders (81.4 percent), and the percentage of small farms (83.8 percent) in middle-income census tracts. Lending in upper-income census tracts (17.8 percent) was comparable to the aggregate of lenders (16.6 percent) and the percentage of small farms (15.2 percent) in upper-income census tracts.

Geographic Distribution of Small Farm Loans								
Assessment Area: 2019 IN Non MSA								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Farms
		2019						
		Count		Dollar				
		Bank	Agg	Bank	Agg	Agg		
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Farm	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.6	0	0.0	0.5	1.0
	Middle	369	82.2	81.4	55,553	81.3	80.8	83.8
	Upper	80	17.8	16.6	12,778	18.7	18.5	15.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			1.3			0.1	
	Total	<b>449</b>	<b>100.0</b>	<b>100.0</b>	<b>68,331</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

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

The bank’s lending activities reflect good distribution of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank.

### HMDA-Reportable Loans

In 2020, the bank’s performance relative to HMDA-reportable loans is adequate as lending to low-income borrowers was slightly below the aggregate of lenders, and below the percentage of families by family income. Within moderate income borrowers, the bank’s performance was slightly below the aggregate of lenders and comparable to the percentage of families by family income. Lending in 2019 was comparable to 2020.

#### Home Purchase

Home purchase loans represent 28.4 percent of the bank’s total HMDA-reportable loans in 2020. Lending to low-income borrowers (8.0 percent) was below that of the aggregate of lenders (13.4 percent) and the percentage of low-income families in the assessment area (19.7 percent). Lending to moderate-income borrowers (29.9 percent) was comparable to the aggregate of lenders (30.5 percent) and is above the percentage of moderate-income families in the assessment area (19.5 percent). In 2020, lending to middle-income borrowers (19.0 percent) was slightly below aggregate lenders (21.7 percent) and the percentage of middle-income families in the assessment area (22.9

percent). The bank made 38.7 percent of its home purchase loans to upper-income borrowers, which is above aggregate lenders (24.0 percent), and similar to the percentage of upper-income families in the assessment area (37.8 percent). The bank made 4.4 percent of its home purchase loans to borrowers of unknown income, which is below aggregate lenders (10.4 percent) and slightly above the demographic (0.0 percent).

### *Refinance*

Refinance loans represent 69.6 percent of the bank's total HMDA-reportable loans in 2020. Lending to low-income borrowers (4.8 percent) was comparable to the aggregate lenders (5.6 percent), but below the percentage of low-income families in the assessment area (19.7 percent). Lending to moderate-income borrowers (16.1 percent) was slightly below aggregate lenders (18.6 percent) and the percentage of moderate-income families in the assessment area (19.5 percent). In 2020, the bank made 23.5 percent of its refinance loans to middle-income borrowers, which is comparable to the performance of aggregate lenders (22.4 percent) and the percentage of middle-income families in the assessment area (22.9 percent). Lending to upper-income borrowers (53.0 percent) was significantly above aggregate lenders (37.6 percent) and the percentage of upper-income families in the assessment area (37.8 percent). The bank made 2.7 percent of its refinance loans to borrowers of unknown income which is below demographic (15.8 percent) and slightly above the demographic (0.0 percent).

The table below presents the borrower distribution of HMDA-reportable loans in the assessment area in 2020. Please refer to Appendix B for borrower distribution data for HMDA-reportable lending in 2019.

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 IN Non MSA</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income	
		2020						
		Count		Dollar				
		Bank	Agg	Bank	Agg			
		#	%	\$ %	\$ %	\$ %	%	
Home Purchase	Low	11	8.0	13.4	769	3.9	7.2	19.7
	Moderate	41	29.9	30.5	4,140	20.8	23.6	19.5
	Middle	26	19.0	21.7	3,230	16.3	22.7	22.9
	Upper	53	38.7	24.0	11,197	56.4	36.2	37.8
	Unknown	6	4.4	10.4	526	2.6	10.3	0.0
	<b>Total</b>		<b>137</b>	<b>100.0</b>	<b>100.0</b>	<b>19,862</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	16	4.8	5.6	1,032	2.1	2.8	19.7
	Moderate	54	16.1	18.6	5,095	10.2	11.9	19.5
	Middle	79	23.5	22.4	10,478	21.1	18.0	22.9
	Upper	178	53.0	37.6	31,474	63.3	44.4	37.8
	Unknown	9	2.7	15.8	1,662	3.3	22.9	0.0
	<b>Total</b>		<b>336</b>	<b>100.0</b>	<b>100.0</b>	<b>49,741</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	9.6	0	0.0	5.1	19.7
	Moderate	1	14.3	19.3	100	11.2	13.8	19.5
	Middle	3	42.9	25.7	240	26.8	20.2	22.9
	Upper	3	42.9	42.0	554	62.0	53.5	37.8
	Unknown	0	0.0	3.5	0	0.0	7.5	0.0
	<b>Total</b>		<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>894</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.7
	Moderate	0	0.0	4.5	0	0.0	0.3	19.5
	Middle	0	0.0	4.5	0	0.0	0.3	22.9
	Upper	1	33.3	6.8	122	3.5	1.1	37.8
	Unknown	2	66.7	84.1	3,393	96.5	98.3	0.0
	<b>Total</b>		<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>3,515</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	7.5	0	0.0	5.5	19.7
	Moderate	0	0.0	21.6	0	0.0	17.1	19.5
	Middle	0	0.0	21.6	0	0.0	18.5	22.9
	Upper	0	0.0	45.6	0	0.0	52.9	37.8
	Unknown	0	0.0	3.7	0	0.0	6.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	7.6	0	0.0	4.1	19.7
	Moderate	0	0.0	18.2	0	0.0	12.5	19.5
	Middle	0	0.0	26.5	0	0.0	23.5	22.9
	Upper	0	0.0	40.9	0	0.0	51.4	37.8
	Unknown	0	0.0	6.8	0	0.0	8.5	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	19.7
	Moderate	0	0.0	0.0	0	0.0	0.0	19.5
	Middle	0	0.0	0.0	0	0.0	0.0	22.9
	Upper	0	0.0	0.0	0	0.0	0.0	37.8
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	27	5.6	8.7	1,801	2.4	4.4	19.7
	Moderate	96	19.9	22.9	9,335	12.6	15.8	19.5
	Middle	108	22.4	21.8	13,948	18.8	19.0	22.9
	Upper	235	48.7	31.9	43,347	58.6	39.6	37.8
	Unknown	17	3.5	14.7	5,581	7.5	21.3	0.0
	<b>Total</b>		<b>483</b>	<b>100.0</b>	<b>100.0</b>	<b>74,012</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

### Small Business Loans

The table below demonstrates a good distribution of small business loans in the bank’s assessment area when compared to aggregate lenders and the percentages of small businesses in the assessment area in 2019.

In 2019, the bank originated 50.5 percent of loans to businesses with revenues of \$1.0 million or less, slightly exceeding aggregate lending to small businesses at 47.4 percent. The performance of both the bank and aggregate lenders was significantly below the percentage of businesses with revenues of \$1.0 million or less (90.2 percent). However, 77.5 percent of small business loans were in loan amounts of \$100,000 or less to small businesses with revenue under \$1.0 million, indicating the bank’s willingness to meet the credit needs of the smallest businesses in the assessment area.

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2019 IN Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		2019			Dollar		Total Businesses		
		Count		Agg	Bank			Agg	
		#	%	%	\$ 000s	\$ %	\$ %	%	
Small Business	Revenue	\$1 Million or Less	138	50.5	47.4	12,973	26.8	29.9	90.2
		Over \$1 Million	111	40.7	52.6	32,950	68.0	70.1	8.0
		Unknown	24	8.8		2,513	5.2		1.8
		<b>Total</b>	<b>273</b>	<b>100.0</b>	<b>100.0</b>	<b>48,436</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	167	61.2	90.7	6,938	14.3	27.6	
		\$100,001 - \$250,000	44	16.1	4.6	7,802	16.1	16.3	
		\$250,001 - \$1 Million	62	22.7	4.7	33,696	69.6	56.1	
		<b>Total</b>	<b>273</b>	<b>100.0</b>	<b>100.0</b>	<b>48,436</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	107	77.5		4,042	31.2		
		\$100,001 - \$250,000	17	12.3		2,960	22.8		
\$250,001 - \$1 Million		14	10.1		5,971	46.0			
<b>Total</b>		<b>138</b>	<b>100.0</b>		<b>12,973</b>	<b>100.0</b>			
Originations & Purchases									
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

### Small Farm Loans

The table below indicates an excellent distribution of loans in the bank’s assessment area when compared to aggregate lenders and the percentage of small farms in the assessment area in 2019.

In 2019, the bank originated 77.3 percent of loans to farms with revenues of \$1.0 million or less. The bank’s performance significantly exceeded the aggregate lending to small farms at 60.0 percent. Both bank and aggregate lender performance was significantly below the percentage of farms with revenues of \$1.0 million or less (98.2 percent); however, 54.2 percent of small farm loans were in

loan amounts of \$100,000 or less to farms with revenues under \$1.0 million, indicating the bank’s willingness to meet the credit needs of the smallest farms in the bank’s assessment area.

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2019 IN Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		Count		Dollar				Total Farms	
		#	%	Agg %	2019		Agg \$ %		
Bank \$ 000s	Bank \$ %								
Small Farm	Revenue	\$1 Million or Less	347	77.3	60.0	49,120	71.9	68.7	98.2
		Over \$1 Million	66	14.7	40.0	15,063	22.0	31.3	1.8
		Unknown	36	8.0		4,148	6.1		0.1
		<b>Total</b>	<b>449</b>	<b>100.0</b>	<b>100.0</b>	<b>68,331</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	233	51.9	68.4	11,629	17.0	20.9	
		\$100,001 - \$250,000	121	26.9	19.3	21,684	31.7	34.2	
		\$250,001 - \$500,000	95	21.2	12.3	35,018	51.2	44.8	
		<b>Total</b>	<b>449</b>	<b>100.0</b>	<b>100.0</b>	<b>68,331</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	188	54.2		9,067	18.5		
		\$100,001 - \$250,000	95	27.4		17,006	34.6		
		\$250,001 - \$500,000	64	18.4		23,047	46.9		
		<b>Total</b>	<b>347</b>	<b>100.0</b>		<b>49,120</b>	<b>100.0</b>		

Originations & Purchases  
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

The bank exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, or businesses (including farms) with gross annual revenues of \$1.0 million or less, consistent with safe and sound operations.

The bank makes limited use of innovative or flexible lending practices, in a safe and sound manner, to address the credit needs of low- or moderate-income individuals or geographies. The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

### Community Development Lending

The bank makes a relatively high level community development loans. The bank originated a total of 46 community development loans for \$25.5 million. Of the 46 loans, the bank originated 24 loans for \$16.9 million supporting economic development, 13 loans for \$4.7 million supporting community services, and nine loans totaling \$3.8 million supporting affordable housing. The affordable housing loans and one economic development loan to enhance a mall and create LMI jobs were particularly responsive to the area needs identified by community representatives. Additionally, the total number and dollar amount of community development loans increased

from the previous evaluation where the bank originated eight loans totaling \$7.9 million. When comparing loans by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the increase in dollar volume by monthly average was 68.2 percent.

The following table presents community development lending in the assessment area during the evaluation period.

<b>Qualified Community Development Loans by Purpose</b>											
<b>September 26, 2017 - September 20, 2021</b>											
	<b>Affordable Housing</b>		<b>Economic Development</b>		<b>Revitalization &amp; Stabilization</b>		<b>Community Services</b>		<b>Total</b>		
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>% of Total \$</b>
IN Non-MSA	9	\$3,810	24	16,941	0	0	13	4,707	46	25,458	34.1

### INVESTMENT TEST

FFBT provides a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank makes occasional use of innovative and/or complex investments to support community initiatives. The bank demonstrates good responsiveness to credit and community development needs.

During the review period, the bank made or maintained four investments totaling approximately \$5.9 million. All but approximately \$29,000 of the investments are new since the previous examination and, as of the evaluation, \$3.6 million remained unfunded. The two affordable housing investments were to housing projects building affordable housing targeted to LMI individuals, and the economic development investment was made to an LLC that invests in small businesses in LMI areas, promoting LMI employment. These three investments were particularly responsive to community needs identified by community representatives. The final investment was applied toward a revenue bond to improve school buildings. At the previous examination, the bank made or maintained six investments totaling \$6.4 million, but the majority (\$5.3 million) were prior period investments. When comparing investments by the 25-month time period of the previous evaluation period and the 48-month time period of the current evaluation, there was a decrease by dollar by a monthly average of 52.4 percent.

The following table presents community development investments in the assessment area during the evaluation period.



Qualified Community Development Investments by Purpose September 26, 2017 - September 20, 2021								
IN Non-MSA	Prior Period Investments		Current Period Investments		Total Investments		Unfunded Commitments	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	1	29	1	5,000	2	5,029	1	3,600
Economic Development	0	0	1	617	1	617	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Community Services	0	0	1	250	1	250	0	0
<b>Total</b>	<b>1</b>	<b>29</b>	<b>3</b>	<b>5,867</b>	<b>4</b>	<b>5,896</b>	<b>1</b>	<b>3,600</b>

*Note: Percentages may not add to 100.0 percent due to rounding.*

In addition to qualified investments, the bank made 44 qualified grants and donations totaling \$164,140. When comparing grants and donations by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the increase by dollar in monthly average is 165.9 percent. The majority of the donations, 41 totaling \$148,140, were made to community service organizations which was responsive based on a need indicated by a community representative.

The table below presents qualified community development donations in the assessment area during the evaluation period.

Qualified Community Development Donations by Purpose September 26, 2017 - September 20, 2021											
IN Non-MSA	Affordable Housing		Economic Development		Revitalization & Stabilization		Community Services		Total		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$
	3	16	0	0	0	0	41	148	44	164	39.5

## **SERVICE TEST**

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

### **Retail Services**

The bank's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. The bank operates 13 branches, 11 full-service ATMs, and 4 cash-only ATMs within this assessment area. One branch with a full-service ATM is located in a moderate-income census tract, while all remaining are located in middle-income tracts. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Since the previous examination, the bank closed one branch and accompanying full-service ATM in a middle-income census tract. Its services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals. Most branches throughout the IN Non-MSA assessment area have standard hours from 9:00 a.m. to 4:00 p.m., Monday through Thursday and are open until 5:00 p.m. on Fridays with extended drive-thru hours, including Saturdays. Six branches vary slightly from these hours, including the Knox Branch, which is located in a moderate-income census tract. The Knox Branch hours vary in that its drive-thru is open an hour earlier on Saturdays, which offers greater convenience than the standard. Applications for all loan and deposit products are accepted at each branch location. Additionally, mortgage applications are accepted online through the bank's website. Alternative delivery systems include ATMs, internet banking, and mobile banking.

### **Community Development Services**

The bank provides a relatively high level of community development services. During the evaluation period, the bank provided 3,131 hours of financial-related services to local organizations. When comparing service hours by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the increase by monthly average was 41.5 percent. Services included board and committee memberships for non-profit organizations, financial education training and seminars, and assistance in the preparation of individual grants and scholarships. The extent of the bank's involvement reflects responsiveness to the variety of needs in the assessment area.

External factors also affected the ability of the bank to identify and respond to community development opportunities in the assessment area during this review period. The nationwide response to the COVID-19 pandemic affected the bank’s communities and its ability to interact with its community members to the extent it had during the previous review period.

<b>Qualified Community Development Services by Purpose</b>											
<b>September 26, 2017 - September 20, 2021</b>											
<b>Indiana Non-MSA</b>	<b>Affordable Housing</b>		<b>Economic Development</b>		<b>Revitalization &amp; Stabilization</b>		<b>Community Services</b>		<b>Total</b>		
	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>% of Total Hours</b>
	9	384	10	312	0	0	98	2,435	117	3,131	58.3

## KOKOMO, IN MSA #29020 – Full Review

### SCOPE OF THE EXAMINATION

FFBT’s operations in the Kokomo MSA assessment area received a full-scope review. The scope for this assessment area is consistent with the scope of examination presented in the overall section of this Performance Evaluation. Please see the detailed description of the scope contained in the introduction section.

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE KOKOMO, IN MSA #29020

The Kokomo, Indiana MSA #29020 assessment area includes Howard County in its entirety and remains unchanged since the last evaluation. The 20 census tracts that make up the bank’s assessment area include two low-, four moderate-, nine middle-, and five upper-income tracts. The bank operates six branch offices and seven ATMs within the assessment area. The following table is a summary of the bank’s branch locations within the Kokomo MSA assessment area.

First Farmers Bank and Trust Branch Locations By Census Tract Income Level (December 31, 2020)				
Tract Income Level	Number of Branches	Percent of Branches	Number of ATMs	Percent of ATMs
Low	0	0.0	0	0.0
Moderate	2	33.3	2	28.6
Middle	3	50.0	4	57.1
Upper	1	16.7	1	14.3
Unknown	0	0.0	0	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>

The FDIC’s Deposit Market Share Report dated June 30, 2020, ranks FFBT second among the 10 FDIC-insured institutions in the assessment area with a 23.1 percent market share. Community First Bank of Indiana ranked first with a market share of 23.8 percent. Based on the 2020 HMDA Market Peer Report, FFBT ranks third out of 207 HMDA reporters in the Kokomo MSA assessment area, originating 212 loans in 2020. The CRA Market Peer Report ranks the bank second out of 52 CRA reporters within the MSA, originating 155 loans in 2019. The data shows that FFBT remains among the top in CRA and HMDA lending despite the area’s strong competition.

The following table presents demographic data specific to the institution’s Kokomo MSA assessment area.

*The following presentation of key demographics used to help inform the evaluation of bank activity in its assessment area is based on a comparison of two sets of ACS data, 2006-2010 and 2011-2015.*

Assessment Area: 2020 Kokomo, IN MSA 29020									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	2	10.0	1,791	8.0	602	33.6	4,955	22.2	
Moderate-income	4	20.0	3,434	15.4	849	24.7	3,704	16.6	
Middle-income	9	45.0	10,461	47.0	1,276	12.2	4,704	21.1	
Upper-income	5	25.0	6,595	29.6	231	3.5	8,918	40.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>20</b>	<b>100.0</b>	<b>22,281</b>	<b>100.0</b>	<b>2,958</b>	<b>13.3</b>	<b>22,281</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	3,862	1,497	6.3	38.8	1,748	45.3	617	16.0	
Moderate-income	7,327	3,372	14.2	46.0	2,460	33.6	1,495	20.4	
Middle-income	17,841	11,558	48.7	64.8	4,830	27.1	1,453	8.1	
Upper-income	9,619	7,304	30.8	75.9	1,644	17.1	671	7.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>38,649</b>	<b>23,731</b>	<b>100.0</b>	<b>61.4</b>	<b>10,682</b>	<b>27.6</b>	<b>4,236</b>	<b>11.0</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	319	11.0	293	11.0	25	12.9	1	3.0	
Moderate-income	545	18.9	498	18.7	39	20.1	8	24.2	
Middle-income	1,327	45.9	1,216	45.7	93	47.9	18	54.5	
Upper-income	697	24.1	654	24.6	37	19.1	6	18.2	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>2,888</b>	<b>100.0</b>	<b>2,661</b>	<b>100.0</b>	<b>194</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>	
		Percentage of Total Businesses:		<b>92.1</b>		<b>6.7</b>		<b>1.1</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	2	1.5	2	1.6	0	0.0	0	0.0	
Moderate-income	2	1.5	2	1.6	0	0.0	0	0.0	
Middle-income	67	51.5	67	51.9	0	0.0	0	0.0	
Upper-income	59	45.4	58	45.0	1	100.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>130</b>	<b>100.0</b>	<b>129</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	
		Percentage of Total Farms:		<b>99.2</b>		<b>0.8</b>		<b>0.0</b>	
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS									
Note: Percentages may not add to 100.0 percent due to rounding									

### Population Characteristics

Based on the 2011 to 2015 U.S. Census Bureau American Community Survey, the population in the assessment area is 82,765. As the following table indicates, the population remained stable with only a slight increase since 2010. During the same time, the population within the state of Indiana increased by 1.3 percent. Community representatives attributed the stability of the population to educational opportunities in the area and concerted efforts to maintain and attract young families.

Kokomo MSA Population Change			
Area	2010 Population	2015 Population	Percent Change (%)
Kokomo MSA	82,752	82,765	0.0
Indiana	6,483,802	6,568,645	1.3

*Source: 2010 U.S. Census Bureau Decennial Census  
 2011 - 2015 U.S. Census Bureau American Community Survey*

### Income Characteristics

In 2015, the median family income (MFI) for the assessment area was \$59,111, which is a slight decrease of 2.2 percent since 2010. This decrease is lower than the 4.8 percent decrease experienced within the state of Indiana during the same time period. The Kokomo MSA is home to 22,281 families, of which 22.2 percent are designated low-income and 16.6 percent are moderate-income. In addition, 13.3 percent of families live below the poverty level. One community representative noted that a majority of the jobs available in the area do not require skilled or college-educated workers.

Kokomo MSA Median Family Income Change			
Area	2010 Median Family Income (\$)	2015 Median Family Income (\$)	Percent Change (%)
Kokomo MSA	60,414	59,111	-2.2
Indiana	64,187	61,119	-4.8

*Source: 2006 - 2010 U.S. Census Bureau American Community Survey  
 2011 - 2015 U.S. Census Bureau American Community Survey  
 Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.*

### Housing Characteristics

The assessment area has 38,649 housing units, of which 61.4 percent are owner-occupied, 27.6 percent are rental units, and 11.0 percent are vacant. There are a total of 23,731 owner-occupied housing units in the assessment area, of which 6.3 percent are located in low- and 14.2 percent are located in moderate-income tracts.

A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix D. A higher ratio supports more affordable

housing opportunities. Based on the 2006-2010 American Community Survey data, the Kokomo MSA (0.46) was more affordable than the state of Indiana (0.40).

The chart below depicts housing cost burden in the assessment area and the state of Indiana. Renters and homeowners are considered “overburdened” when housing costs equal 30.0 percent or more of household income. In the Kokomo MSA, 44.0 percent of all renters experience this burden, including 72.0 percent of low-income renters and 39.0 of moderate-income renters. These numbers are comparable to the burden experienced across renters statewide. Conversely, only 17.0 percent of homeowners experience housing cost burden, including 64.0 percent of low-income homeowners and 32.0 percent of moderate-income homeowners. These numbers are comparable to those of the state. Overall, this indicates that the less income a person has, the higher percentage of their total income they spend on housing.

Community representatives indicated that over the last few months, the real estate market has been at its height in Kokomo, with listed homes being sold quickly and often above the asking price. In terms of affordable housing, one representative mentioned a need for affordable rental units.

Kokomo MSA Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Kokomo MSA	72.0	39.0	44.0	64.0	32.0	17.0
Indiana	75.0	34.0	44.0	61.0	31.0	18.0
<i>Cost Burden is housing cost that equals 30 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy</i>						

### Employment Characteristics

The table below presents employment characteristics between 2015 and 2020. Overall, unemployment rates in the assessment area and the state of Indiana declined from 2015 to 2019; however, in 2020, rates increased due to the COVID-19 pandemic. In 2020, unemployment rates for the assessment area (10.9 percent) were higher than rates for the state of Indiana (7.1 percent). Community representatives indicated that unemployment levels are low within the automotive industry, while lay-offs in the service industry during the peak of COVID-19 caused high unemployment numbers. They expressed that businesses are re-opening and are struggling to find workers.

Kokomo MSA Unemployment Rates (%)						
Area	2015	2016	2017	2018	2019	2020
Kokomo MSA	5.0	4.6	3.8	4.0	4.0	10.9
Indiana	4.8	4.4	3.5	3.4	3.2	7.1

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

## Community Representatives

Two community representatives, with a focus on affordable housing and economic development, were interviewed to help better understand local economic conditions and provide information regarding the assessment area's financial needs. Both representatives strongly emphasized the significance of the automotive industry to the area and the strong correlation between the health of the industry and the health of the economy in Kokomo. It was noted that unemployment is low within that industry in the area. Both representatives had favorable impressions of financial institutions in their area. One representative stated that banks could have a significant impact on affordable housing by providing low-interest loans to landlords to purchase and improve housing stock in the area, as landlords pass off the costs of higher-interest loans onto their tenants.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KOKOMO, INDIANA MSA #29020

### LENDING TEST

Lending activity reflects good geographic distribution of loans in the assessment area, taking into account the number and amount of home mortgage, small business, and small farm loans in the assessment area. The bank displays good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. FFBT exhibits a good record of serving the credit needs of low-income individuals, small businesses, and small farms with gross annual revenues under \$1.0 million and a limited use of innovative or flexible lending practices, in a safe and sound manner, to address the credit needs of low- and moderate-income individuals and geographies. Further, the bank has made a low level of community development loans. There will be no discussion of home improvement or multi-family loans as originations were too low for a meaningful analysis to be conducted. Finally, when determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics (percentage of owner-occupied housing units) as it is a better measure of loan demand.

### Geographic Distribution of Loans

The bank's lending activities reflect good distribution throughout the assessment area. The bank's assessment area includes two low-, four moderate-, nine middle-, and five upper-income tracts.



During the evaluation, there were no conspicuous census tracts lending gaps within the assessment area. With respect to dispersion of lending to various census tracts throughout the assessment area, the bank made both HMDA- and CRA-reportable loans in all of the assessment area census tracts, including low- and moderate-income census tracts in 2020. In 2019, the bank also made loans in all of the assessment area census tracts. One middle-income census tract (5.0 percent) had no HMDA-reportable loans. In 2019, the bank made CRA-reportable loans in all census tracts, with the exception of two middle-income tracts (10.0 percent).

### **HMDA-Reportable Lending**

The geographic distribution of HMDA-reportable loans reflects good penetration throughout the Kokomo MSA assessment area. Overall, the bank's rate of HMDA lending within low-income census tracts was slightly below the aggregate of lenders and the assessment area demographics. The bank's rate of HMDA lending within the moderate-income census tracts was comparable to the aggregate of lenders, but below the assessment area demographics. Lending in 2019 was comparable to 2020.

#### *Home Purchase Loans*

Home purchase loans represent 25.7 percent of the bank's total HMDA-reportable loans in 2020. Home purchase lending within low-income census tracts (3.7 percent) was slightly below aggregate (7.7 percent) and the percentage of owner-occupied housing in low-income census tracts (6.3 percent). Lending in moderate-income tracts (14.8 percent) was above aggregate (9.4 percent) and comparable to the demographic (14.2 percent). The bank originated 53.7 percent of its home purchase loans in middle-income census tracts, which is above the performance of aggregate lenders (48.2 percent) and the percentage of owner-occupied housing in middle-income census tracts (48.7 percent). Lending in upper-income census tracts (27.8 percent) was below the aggregate (34.6 percent) and slightly below the percentage of owner-occupied housing (30.8 percent) in upper-income census tracts.

#### *Refinance Loans*

Refinance loans represent 71.0 percent of the bank's total HMDA-reportable loans in 2020. Lending in low-income census tracts (1.3 percent) was comparable to aggregate (1.3 percent) and below the percentage of owner-occupied housing (6.3 percent). Refinance lending in moderate-income census tracts (2.7 percent) was comparable to aggregate (4.5 percent) and below the percentage of owner-occupied housing (14.2 percent). Additionally, the bank made 64.4 percent of its refinance loans in middle-income census tracts, significantly above the performance of aggregate lenders (49.1 percent) and the percentage of owner-occupied housing (48.7 percent) in middle-income census tracts. Lending in upper-income census tracts (31.5 percent) was below aggregate lenders (45.1 percent) and comparable to the percent of owner-occupied housing (30.8 percent) in upper-income census tracts.

The table below presents the geographic distribution of HMDA-reportable loans in the assessment area in 2020. Please refer to Appendix B for geographic distribution data for HMDA-reportable lending in 2019.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Kokomo, IN MSA 29020								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		Count		Dollar				
		Bank	Agg	Bank	Agg	Agg		
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	2	3.7	7.7	95	1.4	2.6	6.3
	Moderate	8	14.8	9.4	653	9.4	6.0	14.2
	Middle	29	53.7	48.2	3,576	51.7	45.5	48.7
	Upper	15	27.8	34.6	2,589	37.5	46.0	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>6,913</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	2	1.3	1.3	112	0.6	0.6	6.3
	Moderate	4	2.7	4.5	267	1.3	2.5	14.2
	Middle	96	64.4	49.1	11,832	59.7	43.8	48.7
	Upper	47	31.5	45.1	7,592	38.3	53.1	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>149</b>	<b>100.0</b>	<b>100.0</b>	<b>19,803</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	2.5	0	0.0	1.5	6.3
	Moderate	0	0.0	16.5	0	0.0	18.6	14.2
	Middle	2	100.0	50.6	243	100.0	46.5	48.7
	Upper	0	0.0	30.4	0	0.0	33.4	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>243</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	5.6	0	0.0	5.4	Multi-Family 14.2
	Moderate	4	80.0	38.9	6,092	97.3	22.5	8.8
	Middle	1	20.0	44.4	168	2.7	70.7	63.6
	Upper	0	0.0	11.1	0	0.0	1.4	13.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>6,260</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	3.8	0	0.0	0.5	6.3
	Moderate	0	0.0	7.7	0	0.0	2.8	14.2
	Middle	0	0.0	50.0	0	0.0	61.9	48.7
	Upper	0	0.0	38.5	0	0.0	34.8	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	3.4	0	0.0	2.4	6.3
	Moderate	0	0.0	11.2	0	0.0	7.6	14.2
	Middle	0	0.0	50.0	0	0.0	45.0	48.7
	Upper	0	0.0	35.3	0	0.0	45.0	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	2.2	0	0.0	0.9	6.3
	Moderate	0	0.0	13.5	0	0.0	6.5	14.2
	Middle	0	0.0	50.6	0	0.0	51.6	48.7
	Upper	0	0.0	33.7	0	0.0	41.0	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	4	1.9	4.3	207	0.6	1.7	6.3
	Moderate	16	7.6	7.5	7,012	21.1	5.3	14.2
	Middle	128	61.0	48.8	15,819	47.6	46.3	48.7
	Upper	62	29.5	39.5	10,181	30.6	46.6	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>210</b>	<b>100.0</b>	<b>100.0</b>	<b>33,219</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

### Small Business Loans

The table below indicates good distribution of small business loans in the bank’s assessment area when compared to aggregate lenders and the distribution of small businesses in 2019.

Small business lending in low-income census tracts (9.4 percent) was comparable to aggregate lenders (10.3 percent) and the percentage of small businesses (11.1 percent) in low-income census tracts. The percentage of loans (14.1) in moderate-income census tracts was slightly below aggregate (18.2 percent) and the percentage of small businesses within those tracts (18.5 percent). The bank made 50.6 percent of its small business loans in middle-income census tracts, which is above the performance of aggregate lenders (42.8 percent) and slightly above the percentage of small businesses (45.7 percent) in middle-income census tracts. Lending in upper-income census tracts (25.9 percent) was comparable to aggregate lenders (26.0 percent) and the percentage of small businesses (24.7 percent) in upper-income census tracts.

Geographic Distribution of Small Business Loans								
Assessment Area: 2019 Kokomo, IN MSA 29020								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses
		2019			2019			
		Count		Agg	Dollar		Agg	
		Bank	%	%	Bank	%	Agg	%
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Business	Low	8	9.4	10.3	842	5.7	13.6	11.1
	Moderate	12	14.1	18.2	2,340	15.9	12.2	18.5
	Middle	43	50.6	42.8	6,635	45.2	47.7	45.7
	Upper	22	25.9	26.0	4,867	33.1	25.7	24.7
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			2.6			0.8	
	Total	85	100.0	100.0	14,684	100.0	100.0	100.0
Originations & Purchases								
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

### Small Farm Loans

The table below indicates good distribution of small farm loans in the bank’s assessment area when compared to aggregate lenders and the distribution of small farms in 2019.

In 2019, lending in low-income census tracts (1.4 percent) was comparable to the aggregate of lenders (0.9 percent) and the percentage of small farms (1.5 percent) in low-income census tracts. Lending in moderate income census tracts (1.4 percent) was comparable to the aggregate of lenders (0.9 percent) and the percentage of small farms (1.5 percent) in moderate-income census tracts. The bank made 62.9 percent of its small farm loans in middle-income census tracts, which is above the

performance of aggregate lenders (50.9 percent) and the percentage of small farms (54.1 percent) in middle-income census tracts. Lending in upper-income census tracts (34.3 percent) was below the aggregate of lenders (47.4 percent) and the percentage of small farms (43.0 percent) in upper-income census tracts.

Geographic Distribution of Small Farm Loans								
Assessment Area: 2019 Kokomo, IN MSA 29020								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Farms
		2019			2019			
		Count		Agg	Dollar		Agg	
		Bank	Agg	Bank	Agg			
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Farm	Low	1	1.4	0.9	25	0.2	0.2	1.5
	Moderate	1	1.4	0.9	150	1.3	1.1	1.5
	Middle	44	62.9	50.9	6,956	60.3	52.9	54.1
	Upper	24	34.3	47.4	4,408	38.2	45.8	43.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.0			0.0	
	Total		70	100.0	100.0	11,539	100.0	100.0

Originations & Purchases  
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

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

The bank’s lending activities reflect good distribution of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank.

### HMDA-Reportable Loans

In 2020, the bank’s performance relative to HMDA-reportable loans is good as lending to low-income borrowers was comparable to the aggregate of lenders while significantly below the percentage of families by family income. Within moderate-income borrowers, the bank’s performance was slightly above the aggregate of lenders and above the percentage of families by family income. Lending in 2019 was comparable to 2020.

#### Home Purchase

Home purchase loans represent 25.7 percent of the bank’s total HMDA-reportable loans in 2020. Lending to low-income borrowers (13.0 percent) was comparable to the aggregate of lenders (12.9 percent), but below the percentage of low-income families in the assessment area (22.2 percent). Lending to moderate-income borrowers (33.3 percent) exceeded the aggregate of lenders (26.8

percent) and is significantly above the percentage of moderate-income families in the assessment area (16.6 percent). In 2020, lending to middle-income borrowers (25.9 percent) was slightly above aggregate lenders (23.0 percent) and the percentage of middle-income families in the assessment area (21.1 percent). The bank made 25.9 percent of its home purchase loans to upper-income borrowers, which was comparable to the performance of aggregate lenders (24.0 percent), but below the percentage of upper-income families in the assessment area (40.0 percent).

### *Refinance*

Refinance loans represent 71.0 percent of the bank's total HMDA-reportable loans in 2020. Lending to low-income borrowers (4.7 percent) was comparable to the aggregate of lenders (5.2 percent), but significantly below the percentage of low-income families in the assessment area (22.2 percent). Lending to moderate-income borrowers (22.1 percent) was slightly above aggregate lenders (17.5 percent) and above the percentage of moderate-income families in the assessment area (16.6 percent). In 2020, the bank made 28.9 percent of its refinance loans to middle-income borrowers, which exceeds the performance of aggregate lenders (22.2 percent) and the percentage of middle-income families in the assessment area (21.1 percent). Lending to upper-income borrowers (40.9 percent) was above aggregate lenders (34.0 percent) and comparable to the percentage of upper-income families in the assessment area (40.0 percent).

The table below presents the borrower distribution of HMDA-reportable loans in the assessment area in 2020. Please refer to Appendix B for borrower distribution data for HMDA-reportable lending in 2019.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Kokomo, IN MSA 29020								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020			2020			
		Count Bank		Agg	Dollar Bank		Agg	
	#	%	%	\$(000s)	\$ %	\$ %		
Home Purchase	Low	7	13.0	12.9	400	5.8	6.6	22.2
	Moderate	18	33.3	26.8	1,406	20.3	21.2	16.6
	Middle	14	25.9	23.0	1,826	26.4	24.6	21.1
	Upper	14	25.9	24.0	3,038	43.9	33.9	40.0
	Unknown n	1	1.9	13.3	243	3.5	13.7	0.0
	<b>Total</b>	<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>6,913</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	7	4.7	5.2	411	2.1	2.5	22.2
	Moderate	33	22.1	17.5	2,725	13.8	12.0	16.6
	Middle	43	28.9	22.2	5,450	27.5	18.8	21.1
	Upper	61	40.9	34.0	10,605	53.6	41.5	40.0
	Unknown n	5	3.4	21.2	612	3.1	25.2	0.0
	<b>Total</b>	<b>149</b>	<b>100.0</b>	<b>100.0</b>	<b>19,803</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	10.1	0	0.0	6.8	22.2
	Moderate	1	50.0	17.7	114	46.9	15.1	16.6
	Middle	1	50.0	22.8	129	53.1	17.6	21.1
	Upper	0	0.0	45.6	0	0.0	55.2	40.0
	Unknown n	0	0.0	3.8	0	0.0	5.3	0.0
	<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>243</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	22.2
	Moderate	0	0.0	0.0	0	0.0	0.0	16.6
	Middle	0	0.0	5.6	0	0.0	0.9	21.1
	Upper	0	0.0	16.7	0	0.0	1.7	40.0
	Unknown n	5	100.0	77.8	6,260	100.0	97.4	0.0
	<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>6,260</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	3.8	0	0.0	7.9	22.2
	Moderate	0	0.0	26.9	0	0.0	18.7	16.6
	Middle	0	0.0	26.9	0	0.0	27.8	21.1
	Upper	0	0.0	42.3	0	0.0	45.7	40.0
	Unknown n	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	9.5	0	0.0	4.4	22.2
	Moderate	0	0.0	18.1	0	0.0	16.6	16.6
	Middle	0	0.0	34.5	0	0.0	28.9	21.1
	Upper	0	0.0	37.9	0	0.0	50.1	40.0
	Unknown n	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	22.2
	Moderate	0	0.0	0.0	0	0.0	0.0	16.6
	Middle	0	0.0	0.0	0	0.0	0.0	21.1
	Upper	0	0.0	0.0	0	0.0	0.0	40.0
	Unknown n	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	14	6.7	8.6	811	2.4	4.2	22.2
	Moderate	52	24.8	21.2	4,245	12.8	15.2	16.6
	Middle	58	27.6	22.4	7,405	22.3	20.1	21.1
	Upper	75	35.7	29.1	13,643	41.1	35.6	40.0
	Unknown n	11	5.2	18.7	7,115	21.4	24.9	0.0
	<b>Total</b>	<b>210</b>	<b>100.0</b>	<b>100.0</b>	<b>33,219</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data  
Note: Percentages may not add to 100.0 percent due to rounding

### Small Business Loans

The table below demonstrates a good distribution of small business loans in the bank’s assessment area when compared to aggregate lenders and the percentages of small businesses in the assessment area in 2019.

In 2019, the bank originated 52.9 percent of loans to businesses with revenues of \$1.0 million or less, which is above aggregate lending to small businesses at 44.3 percent. Both bank and aggregate lender performance were significantly below the percentage of businesses with revenues of \$1.0 million or less (92.3 percent); however, 68.9 percent of small business loans were in loan amounts of \$100,000 or less to small businesses with revenue under \$1.0 million, indicating the bank’s willingness to meet the credit needs of the smallest businesses in the assessment area.

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2019 Kokomo, IN MSA 29020									
Product Type		Bank & Aggregate Lending Comparison							
		2019			Dollar		Total Businesses		
		Count		Agg	Bank			Agg	
		#	%	%	\$ 000s	\$ %	\$ %	%	
Small Business	Revenue	\$1 Million or Less	45	52.9	44.3	6,347	43.2	37.8	92.3
		Over \$1 Million	30	35.3	55.7	6,866	46.8	62.2	6.6
		Unknown	10	11.8		1,471	10.0		1.0
		Total	<b>85</b>	<b>100.0</b>	<b>100.0</b>	<b>14,684</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	48	56.5	91.1	2,232	15.2	28.4	
		\$100,001 - \$250,000	20	23.5	4.8	3,628	24.7	19.3	
		\$250,001 - \$1 Million	17	20.0	4.1	8,824	60.1	52.3	
		Total	<b>85</b>	<b>100.0</b>	<b>100.0</b>	<b>14,684</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	31	68.9		1,310	20.6		
		\$100,001 - \$250,000	7	15.6		1,392	21.9		
\$250,001 - \$1 Million		7	15.6		3,645	57.4			
Total		<b>45</b>	<b>100.0</b>		<b>6,347</b>	<b>100.0</b>			
Originations & Purchases									
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

### Small Farm Loans

The table below indicates an excellent distribution of loans in the bank’s assessment area when compared to aggregate lenders and the percentage of small farms in the assessment area in 2019.

In 2019, the bank originated 82.9 percent of loans to farms with revenues of \$1.0 million or less. The bank’s performance significantly exceeded aggregate lending to small farms at 66.4 percent. Both bank and aggregate lender performance were significantly below the percentage of farms with revenues of \$1.0 million or less (100.0 percent); however, 58.6 percent of small farm loans were in



loan amounts of \$100,000 or less to farms with revenues under \$1.0 million, indicating the bank’s willingness to meet the credit needs of the smallest farms in the bank’s assessment area.

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2019 Kokomo, IN MSA 29020									
Product Type		Bank & Aggregate Lending Comparison							
		Count		2019				Total Farms	
		Bank	Agg	Dollar		Agg	Total Farms		
#	%			\$ 000s	\$ %				\$ %
Small Farm	Revenue	\$1 Million or Less	58	82.9	66.4	8,798	76.2	72.4	100.0
		Over \$1 Million	8	11.4	33.6	1,891	16.4	27.6	0.0
		Unknown	4	5.7		850	7.4		0.0
		Total	70	100.0	100.0	11,539	100.0	100.0	100.0
	Loan Size	\$100,000 or Less	36	51.4	63.8	1,811	15.7	17.9	
		\$100,001 - \$250,000	18	25.7	22.4	3,093	26.8	33.6	
		\$250,001 - \$500,000	16	22.9	13.8	6,635	57.5	48.5	
		Total	70	100.0	100.0	11,539	100.0	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	34	58.6		1,661	18.9		
		\$100,001 - \$250,000	12	20.7		2,177	24.7		
		\$250,001 - \$500,000	12	20.7		4,960	56.4		
		Total	58	100.0		8,798	100.0		
Originations & Purchases									
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

The bank exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment areas, low-income individuals, or businesses (including farms) with gross annual revenues of \$1.0 million or less, consistent with safe and sound operations.

The bank makes limited use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- or moderate-income individuals or geographies. The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

### Community Development Lending

The bank makes a low level of community development loans. Specifically, the bank originated six loans totaling \$770,300, supporting economic development, affordable housing, and community service initiatives targeted to low- and moderate-income individuals. The affordable housing loan and the economic development loan to promote employment in a small business were the most responsive to identified needs in the assessment area. The total number and dollar amount of community development loans increased from the previous examination where the bank

originated three loans totaling \$555,000. However, when comparing loans by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the decrease in dollar volume by monthly average was 27.7 percent.

The following table presents community development lending in the assessment area during the evaluation period.

Qualified Community Development Loans by Purpose September 26, 2017 - September 20, 2021											
Kokomo MSA	Affordable Housing		Economic Development		Revitalization & Stabilization		Community Services		Total		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$
	1	75	1	146	0	0	4	549	6	770	1.0

## INVESTMENT TEST

The bank made a poor level of qualified community development investments and donations, particularly those not routinely provided by private investors, and rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support community initiatives. Finally, the bank exhibits adequate responsiveness to credit and community development needs.

During the current review period, the bank made one qualified investment for \$25,000 designated to support community services through a school revenue bond. At the previous examination, the bank made a similar investment for \$435,000. When comparing investments by the 25-month time period of the previous evaluation period and the 48-month time period of the current evaluation, this was a significant decrease by monthly average at 97.0 percent.

The table below presents qualified community development donations in the assessment area during the evaluation period.

Qualified Community Development Investments by Purpose September 26, 2017 - September 20, 2021								
Kokomo MSA	Prior Period Investments		Current Period Investments		Total Investments		Unfunded Commitments	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	0	0	0	0	0	0	0	0
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Community Services	0	0	1	25	1	25	0	0
Total	0	0	1	25	1	25	0	0

*Note: Percentages may not add to 100.0 percent due to rounding.*

The bank also made 26 donations totaling \$96,767 to various community service organizations that provide services to low- and moderate-income individuals. At the previous examination, the bank provided 28 donations totaling \$52,325. When comparing grants and donations by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the slight decrease by dollar in monthly average is 3.7 percent.

Qualified Community Development Donations by Purpose September 26, 2017 - September 20, 2021											
Kokomo MSA	Affordable Housing		Economic Development		Revitalization & Stabilization		Community Services		Total		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$
	0	0	0	0	0	0	0	26	97	26	97

## SERVICE TEST

The bank's delivery systems are readily accessible to geographies and individuals of different income levels in the assessment area. The bank's services are reasonable and do not vary in a way that inconveniences low- and moderate-income individuals or geographies. The bank has not opened or closed any offices within the assessment area during the review period. In addition, the bank provides an adequate level of community development services.

## **Retail Services**

The bank's retail delivery services are readily accessible to geographies and individuals of different income levels in its assessment area. The bank operates six branches, six full-service ATMs, and one cash-only ATM within this assessment area in the cities of Kokomo, Russiaville, and Greentown, Indiana. In Kokomo, two branches with full-service ATMs are located in moderate-income census tracts while the remainder are in middle- or upper-income tracts. The bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, as they have not opened or closed any offices during the review period.

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

## **Community Development Services**

FFBT provides an adequate level of community development services in the Kokomo MSA assessment area. During the review period, bank employees provided 1,025 hours of community development services to local organizations compared to 858 hours of service at the previous examination. When comparing service hours by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation this represents a decrease by monthly average of 37.8 percent. Bank employees provided a wide range of community development services to a variety of organizations through their participation as board members, financial committee members, and offering technical assistance and financial literacy education. The majority of organizations benefitting from these services focused on community services and affordable housing projects targeted to low- and moderate-income individuals. Community representatives stated that affordable housing was a need in the area, and services such as those the bank offers demonstrate responsiveness to assessment area needs.

External factors also affected the ability of the bank to identify and respond to community development opportunities in the assessment area during this review period. The nationwide response to the COVID-19 pandemic affected the bank's communities and its ability to interact with its community members to the extent it had during the previous review period.

Qualified Community Development Services by Purpose September 26, 2017 - September 20, 2021											
Kokomo MSA	Affordable Housing		Economic Development		Revitalization & Stabilization		Community Services		Total		
	#	Hrs	#	Hrs	#	Hrs	#	Hrs	#	Hrs	% of Total Hours
	2	264	3	152	0	0	22	609	27	1,025	19.1

**INDIANAPOLIS-CARMEL-ANDERSON, IN MSA #26900 – Full Review**

**SCOPE OF THE EXAMINATION**

FFBT’s operations in the Indianapolis MSA received a full scope review. The scope for this assessment area is consistent with the scope of examination presented in the overall section of the Performance Evaluation. Please see the detailed description of the scope contained in the introduction section.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN INDIANAPOLIS-CARMEL-ANDERSON, INDIANA MSA#26900**

FFBT delineates the counties of Boone, Hamilton, and Madison in their entireties within the Indianapolis-Carmel-Anderson IN MSA #26900, while excluding the eight remaining counties. The assessment area remains unchanged since the last examination.

The assessment area includes 86 census tracts comprised of six low-, 14 moderate-, 31 middle-, 34 upper-, and one unknown-income census tract. The unknown-income tract is predominantly made up of a correctional facility. The bank maintains two branches and two ATMs in Hamilton County (one middle- and one upper-income) and one branch and one ATM in Madison County (middle-income). Included in the aforementioned three branches are a branch and ATM that were opened in a middle-income tract in Hamilton County on December 20, 2020. No branches were closed in the Indianapolis MSA assessment area since the prior CRA examination. While Boone County does not contain a branch presence, one of the branches in Hamilton County is situated in close proximity to the Boone/Hamilton County border. All three counties are located north of Marion County, which primarily covers the city of Indianapolis, the largest city and state capital of Indiana.

The following table is a summary of the bank’s branch locations in the Indianapolis MSA assessment area.

<b>First Farmers Bank and Trust Branch Locations By Census Tract Income Level (December 31, 2020)</b>				
<b>Tract Income Level</b>	<b>Number of Branches</b>	<b>Percent of Branches</b>	<b>Number of ATMs</b>	<b>Percent of ATMs</b>
Low	0	0.0	0	0.0
Moderate	0	0.0	0	0.0
Middle	2	66.6	2	66.6
Upper	1	33.3	1	33.3
Unknown	0	0.0	0	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>

According to the June 30, 2020 FDIC Deposit Market Share Report, FFBT is ranked 21<sup>st</sup> of 31 FDIC-insured institutions in the Indianapolis MSA, holding 0.5 percent of the deposit market share. The top-ranked institutions are First Internet Bank of Indiana (18.9 percent), Merchants Bank of Indiana (18.3 percent), and JP Morgan Chase Bank (13.2 percent). In addition to the FDIC Deposit Market Share Report rankings, of the FDIC-insured institutions that hold market share within the assessment area, FFBT ranked 67<sup>th</sup> of 564 in HMDA-reportable loan originations and purchases with 150 originations. In 2019, FFBT ranked 24<sup>th</sup> of 113 CRA-reporters with 63 originations of small business and small farm loans.

The following table presents demographic data specific to the Indianapolis MSA assessment area.

*The following presentation of key demographics used to help inform the evaluation of bank activity in its assessment area is based on a comparison of two sets of ACS data, 2006-2010 and 2011-2015.*

Assessment Area: 2020 Indianapolis-Carmel-Anderson, IN MSA 26900								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	7.0	2,588	2.0	867	33.5	17,817	13.7
Moderate-income	14	16.3	13,915	10.7	2,549	18.3	19,191	14.7
Middle-income	31	36.0	38,336	29.4	2,424	6.3	23,742	18.2
Upper-income	34	39.5	75,602	58.0	1,851	2.4	69,691	53.4
Unknown-income	1	1.2	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>86</b>	<b>100.0</b>	<b>130,441</b>	<b>100.0</b>	<b>7,691</b>	<b>5.9</b>	<b>130,441</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,125	2,140	1.6	30.0	3,011	42.3	1,974	27.7
Moderate-income	26,368	13,189	9.6	50.0	9,454	35.9	3,725	14.1
Middle-income	58,272	41,823	30.4	71.8	12,036	20.7	4,413	7.6
Upper-income	105,394	80,462	58.5	76.3	20,327	19.3	4,605	4.4
Unknown-income	9	0	0.0	0.0	9	100.0	0	0.0
<b>Total Assessment Area</b>	<b>197,168</b>	<b>137,614</b>	<b>100.0</b>	<b>69.8</b>	<b>44,837</b>	<b>22.7</b>	<b>14,717</b>	<b>7.5</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	651	2.5	578	2.4	70	3.8	3	1.1
Moderate-income	2,511	9.6	2,297	9.6	190	10.3	24	8.6
Middle-income	5,418	20.8	4,981	20.8	352	19.1	85	30.5
Upper-income	17,432	67.0	16,036	67.1	1,230	66.6	166	59.5
Unknown-income	11	0.0	6	0.0	4	0.2	1	0.4
<b>Total Assessment Area</b>	<b>26,023</b>	<b>100.0</b>	<b>23,898</b>	<b>100.0</b>	<b>1,846</b>	<b>100.0</b>	<b>279</b>	<b>100.0</b>
		Percentage of Total Businesses:		91.8		7.1		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	11	1.9	11	1.9	0	0.0	0	0.0
Middle-income	411	71.2	405	71.1	6	85.7	0	0.0
Upper-income	155	26.9	154	27.0	1	14.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>577</b>	<b>100.0</b>	<b>570</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
		Percentage of Total Farms:		98.8		1.2		0.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding



## Population Characteristics

As presented in the table below, population has generally increased throughout the counties that make up the Indianapolis MSA. Specifically, Boone County and Hamilton County have seen an increase in population from 2010 to 2015, increasing 6.8 and 8.0 percent respectfully. Conversely, Madison County experienced a small decrease in population over the same period. The population growth in the assessment area has increased at a larger rate than the state of Indiana as a whole, citing 5.3 percent growth from 2010 to 2015. The assessment area has a population of 487,426 according to the 2015 U.S. Census Bureau. The state of Indiana experienced a population growth of 1.3 percent over the same time period, while the MSA as a whole experienced a 3.3 percent growth.

Indianapolis MSA AA Population Change			
Area	2010 Population	2015 Population	Percent Change (%)
Assessment Area	462,845	487,426	5.3
Boone County, IN	56,640	60,511	6.8
Hamilton County, IN	274,569	296,635	8.0
Madison County, IN	131,636	130,280	-1.0
Indianapolis MSA	1,887,877	1,950,674	3.3
Indiana	6,483,802	6,568,645	1.3
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 - 2015 U.S. Census Bureau American Community Survey</i>			

## Income Characteristics

Median family income (MFI) in the assessment area has declined from the period of 2010 to 2015 in all counties included within the assessment area. Most notably, Boone County and Madison County experienced slightly larger MFI decreases of 8.6 percent and 6.1 percent, respectfully. Hamilton County experienced a smaller decrease when compared to the other counties making up the Indianapolis MSA assessment area, decreasing only 0.5 percent, which is also less than the decrease experienced by the state of Indiana and the MSA overall. The state of Indiana experienced a 4.8 percent decrease, similar to the decline experienced by the MSA of 5.1 percent. One community representative stated that they believe the area has experienced a significant amount of growth since 2015, especially attributed to economic development efforts, so they do not anticipate that the downward trend of MFI has continued after 2015.

The Indianapolis MSA assessment area is home to 130,441 families, of which 13.7 percent are designated as low-income and 14.7 are moderate-income. In addition, 5.9 percent of families live below the poverty level.

<b>Indianapolis MSA AA Median Family Income Change</b>			
<b>Area</b>	<b>2010 Median Family Income (\$)</b>	<b>2015 Median Family Income (\$)</b>	<b>Percent Change (%)</b>
Assessment Area	86,664	84,167	-2.9
Boone County, IN	88,642	81,000	-8.6
Hamilton County, IN	103,860	103,322	-0.5
Madison County, IN	58,701	55,141	-6.1
Indianapolis MSA	70,415	66,803	-5.1
Indiana	64,187	61,119	-4.8

*Source: 2006 - 2010 U.S. Census Bureau American Community Survey  
2011 - 2015 U.S. Census Bureau American Community Survey  
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.*

### Housing Characteristics

The assessment area has 197,168 housing units, of which 69.8 percent are owner-occupied, 22.7 percent are rental units, and 7.5 percent are vacant. There are a total of 137,614 owner-occupied housing units in the assessment area, of which 11.1 percent are located in low- and moderate-income tracts.

A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix D. A higher ratio supports more affordable housing opportunities. Based on the 2006-2010 American Community Survey data, the Indianapolis MSA (0.38) was slightly less affordable than the state of Indiana (0.40).

The chart below depicts housing cost burden in the assessment area and the state of Indiana. Renters and homeowners are considered “overburdened” when housing costs equal 30.0 percent or more of household income. The table below notes 39.0 percent of all renters in the assessment area experience this burden, including 77.0 percent of low-income renters and 43.0 percent of moderate-income renters. These numbers are comparable to the state for low-income, above the state for moderate-income, and below the state for overall. Conversely, only 17.0 percent of homeowners experience housing cost burden, including 65.0 percent of low-income homeowners and 39.0 percent of moderate-income homeowners. These numbers are comparable to or above those of the state. Overall, this indicates that the less income a person has, the higher percentage of their total income they spend on housing. Reviewing the MFI decreases mentioned in the income characteristics section, some of this burden may be due to decreasing median family incomes, as well as increasing housing cost as mentioned by community representatives.

According to community representatives, the housing market within the assessment area, and in the state of Indiana saw increased housing prices across all forms of real estate during 2020, especially during the COVID-19 pandemic which strained renters and some owners. One representative discussed a large need for additional affordable housing in the area, noting that all types of housing, including single-family, rentals, and apartment units, were in high demand.

Indianapolis MSA AA Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	77.0	43.0	39.0	65.0	39.0	17.0
Boone County, IN	76.0	37.0	41.0	62.0	33.0	17.0
Hamilton County, IN	84.0	49.0	36.0	68.0	45.0	16.0
Madison County, IN	73.0	36.0	43.0	63.0	31.0	19.0
Indianapolis MSA	78.0	34.0	45.0	64.0	36.0	19.0
Indiana	75.0	34.0	44.0	61.0	31.0	18.0
<i>Cost Burden is housing cost that equals 30 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy</i>						

### Employment Characteristics

The table below presents unemployment characteristics between 2015 and 2020. Overall, unemployment rates in the assessment area and the state of Indiana declined from 2015 to 2019; however, in 2020, unemployment rates increased due to the COVID-19 pandemic. Boone County and Hamilton County have a slightly lower unemployment rate than the assessment area with 4.3 percent and 4.7 percent, respectively. Madison County’s unemployment rate is above that of the state of Indiana and the Indianapolis MSA assessment area, at 7.9 percent. The assessment area had an unemployment rate of 5.3 percent in 2020, lower than the state of Indiana and the entire MSA, which had unemployment rates of 7.1 percent and 6.6 percent respectively.

Community representatives indicated that unemployment was relatively stable in the year prior to 2020, with the COVID-19 pandemic causing major shifts in unemployment as industries shut down and many individuals became unemployed until many businesses began re-opening.

Indianapolis MSA AA Unemployment Rates (%)						
Area	2015	2016	2017	2018	2019	2020
Assessment Area	3.9	3.6	3.0	2.9	2.7	5.3
Boone County, IN	3.7	3.3	2.8	2.7	2.4	4.3
Hamilton County, IN	3.4	3.2	2.7	2.7	2.5	4.7
Madison County, IN	5.6	5.0	3.9	3.8	3.6	7.9
Indianapolis MSA	4.5	4.0	3.3	3.2	2.9	6.6
Indiana	4.8	4.4	3.5	3.4	3.2	7.1
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i>						

### Community Representatives

Two community representatives, with a focus on affordable housing and economic development, were interviewed to help better understand local economic conditions and provide information regarding the assessment area’s financial needs. One representative noted a high demand for affordable housing and suggested that banks could better serve the needs of the assessment area by working with developers to help them get funding in a timelier fashion. Another contact

indicated a need for outreach about available credit options to small businesses.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANAPOLIS-CARMEL-ANDERSON, IN MSA #26900**

### **LENDING TEST**

The bank displays adequate geographic distribution of loans in its assessment area. FFBT demonstrates good borrower distribution, particularly in its assessment area, of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. FFBT exhibits a good record of serving the credit needs of highly economically disadvantaged areas in the assessment area and low-income individuals consistent with safe and sound operations. The bank demonstrates limited use of innovative and flexible practices, in a safe and sound manner, to address the credit needs of low- or moderate-income individuals or geographies. Further, the bank has made an adequate level of community development loans. There will be no discussion of home improvement or multi-family loans as originations were too low for a meaningful analysis to be conducted. Finally, when determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics (percentage of owner-occupied housing units) as it is a better measure of loan demand.

### **Geographic Distribution of Loans**

The bank's lending activities reflect adequate distribution throughout the assessment area. The bank's assessment area includes six low-, 14 moderate-, 31 middle-, 34 upper-, and one unknown-income census tracts.

During the evaluation, there were no conspicuous census tract lending gaps within the assessment area. In 2020, the bank originated HMDA and CRA loans in 51 of the census tracts, or 59.4 percent, including 35.0 percent of low- and moderate-income tracts. This performance showed an improvement over 2019, when the bank originated loans in 26 census tracts, or 30.2 percent, including only 25.0 percent of low- and moderate-income tracts. Overall, the dispersion analysis reveals that the bank continues to serve its assessment area.

### **HMDA-Reportable Lending**

The geographic distribution of HMDA-reportable loans reflects good penetration throughout the Indianapolis MSA assessment. Overall, the bank's performance in low-income census tracts was comparable to the aggregate and to the assessment area demographics. Performance within moderate-income tracts was slightly higher than the aggregate lenders and comparable to the assessment area demographics. Lending in 2019 was comparable to 2020.

### *Home Purchase Loans*

In 2020, home purchase loans comprised 20.0 percent of HMDA-reportable loans. FFBT did not originate any home purchase loans in low-income census tracts, which was comparable to the 0.4 percent by aggregate lenders and the 1.6 percent of owner-occupied housing in these census tracts. FFBT made 10.0 percent of its home purchase loans in moderate-income census tracts, slightly above the 6.2 percent made by aggregate lenders and comparable to the 9.6 percent of owner-occupied housing in these census tracts. The bank made 50.0 percent of its home purchase loans in middle-income census tracts, which was significantly above the 23.9 percent by aggregate lenders and the 30.4 percent of owner-occupied housing in these census tracts. FFBT made 40.0 percent of its home purchase loans in upper-income census tracts. The bank's performance was significantly below the 69.5 percent of home purchase loans made by aggregate lenders and the 58.5 percent of owner-occupied housing in these census tracts.

### *Refinance Loans*

In 2020, refinance loans represent 59.3 percent of the bank's total HMDA-reportable loans. FFBT did not originate any refinance loans in low-income census tracts. This is comparable to aggregate lenders who made 0.1 percent of these loans in low-income census tracts and to the 1.6 percent of owner-occupied housing in these census tracts. FFBT made 7.9 percent of its refinance loans in moderate-income census tracts, which was above the 2.3 percent by aggregate lenders and comparable to the 9.6 percent of owner-occupied housing in these census tracts. The bank made 53.9 percent of its refinance loans in middle-income census tracts, which is significantly above the 19.5 percent by aggregate lenders and the 30.4 percent of owner-occupied housing in these census tracts. FFBT made 38.2 percent of its refinance loans in upper-income census tracts. The bank's performance was significantly below the 78.1 percent of refinance loans made by aggregate lenders and the 58.5 percent of owner-occupied housing in these census tracts.

The table below presents the geographic distribution of HMDA-reportable loans in the assessment area in 2020. Please refer to Appendix B for geographic distribution data for HMDA-reportable lending in 2019.

<b>Geographic Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 Indianapolis-Carmel-Anderson, IN MSA 26900</b>								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.4	0	0.0	0.1	1.6
	Moderate	3	10.0	6.2	271	3.8	2.8	9.6
	Middle	15	50.0	23.9	3,404	47.4	18.4	30.4
	Upper	12	40.0	69.5	3,499	48.8	78.7	58.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>7,174</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.1	0	0.0	0.0	1.6
	Moderate	7	7.9	2.3	620	3.5	1.0	9.6
	Middle	48	53.9	19.5	8,755	49.6	15.5	30.4
	Upper	34	38.2	78.1	8,261	46.8	83.5	58.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>89</b>	<b>100.0</b>	<b>100.0</b>	<b>17,636</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.1	0	0.0	0.0	1.6
	Moderate	1	20.0	3.2	70	12.1	1.9	9.6
	Middle	3	60.0	25.0	400	69.0	21.9	30.4
	Upper	1	20.0	71.7	110	19.0	76.2	58.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>580</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	15.6	0	0.0	2.6	<b>Multi-Family</b> 4.1
	Moderate	0	0.0	28.1	0	0.0	34.1	10.3
	Middle	0	0.0	28.1	0	0.0	16.2	20.5
	Upper	0	0.0	28.1	0	0.0	47.1	65.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.4	0	0.0	0.1	1.6
	Moderate	0	0.0	3.6	0	0.0	1.9	9.6
	Middle	0	0.0	25.8	0	0.0	21.3	30.4
	Upper	0	0.0	70.3	0	0.0	76.7	58.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.4	0	0.0	0.1	1.6
	Moderate	0	0.0	7.2	0	0.0	3.3	9.6
	Middle	0	0.0	22.9	0	0.0	18.2	30.4
	Upper	0	0.0	69.5	0	0.0	78.5	58.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	1.9	0	0.0	0.6	1.6
	Moderate	1	3.8	10.0	388	2.5	4.3	9.6
	Middle	4	15.4	36.3	2,640	16.8	28.4	30.4
	Upper	21	80.8	51.8	12,681	80.7	66.8	58.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>15,709</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0.2	0	0.0	0.1	1.6
	Moderate	12	8.0	3.7	1,349	3.3	2.3	9.6
	Middle	70	46.7	21.4	15,199	37.0	16.7	30.4
	Upper	68	45.3	74.7	24,551	59.7	80.9	58.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>150</b>	<b>100.0</b>	<b>100.0</b>	<b>41,099</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

### Small Business Loans

The table below indicates poor distribution of loans in the bank’s assessment area when compared to aggregate lenders and the distribution of small businesses in 2019.

In 2019, FFBT did not originate any small business loans in low-income census tracts, which is comparable to the 1.9 percent by aggregate lenders and slightly below the 2.5 percent of businesses in these census tracts. FFBT also did not originate any small business loans in moderate-income census tracts, which is below the 7.5 percent by aggregate lenders and the 9.6 percent of businesses in these census tracts. The bank made 50.0 percent of small business loans in middle-income census tracts, which was significantly above the 17.5 percent by aggregate lenders and the 20.8 percent of businesses in these census tracts. FFBT made 50.0 percent of small business loans in upper-income census tracts, which was significantly below the 72.2 percent by aggregate lenders and 67.0 percent of businesses in these census tracts.

<b>Geographic Distribution of Small Business Loans</b>								
<b>Assessment Area: 2019 Indianapolis-Carmel-Anderson, IN MSA 26900</b>								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses
		2019						
		Count		Dollar				
		Bank	Agg	Bank	Agg	Bank	Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Business	Low	0	0.0	1.9	0	0.0	2.0	2.5
	Moderate	0	0.0	7.5	0	0.0	8.7	9.6
	Middle	9	50.0	17.5	1,370	32.7	17.8	20.8
	Upper	9	50.0	72.2	2,826	67.3	71.0	67.0
	Unknown	0	0.0	0.0	0	0.0	0.3	0.0
	Tr Unknown			0.9			0.2	
	<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>4,196</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

### Small Farm Loans

The table below indicates good distribution of loans in the bank’s assessment area when compared to aggregate lenders and the distribution of small farms in 2019.

In 2019, there were no small farms in low-income census tracts. FFBT originated 2.2 percent of small farm loans in moderate-income census tracts, which is comparable to the 2.4 percent by aggregate lenders and the 2.3 percent of farms in these census tracts. The bank made 84.4 percent of small farm loans in middle-income census tracts, which was above the 73.7 percent by aggregate lenders and significantly above the 68.5 percent of farms in these census tracts. FFBT made 13.3

percent of small farm loans in upper-income census tracts, which was below the 23.1 percent by aggregate lenders and significantly below the 29.2 percent of farms in these census tracts.

Geographic Distribution of Small Farm Loans							
Assessment Area: 2019 Indianapolis-Carmel-Anderson, IN MSA 26900							
	Tract Income Levels	Bank & Aggregate Lending Comparison					Total Farms
		2019					
		Count		Dollar			
		Bank	Agg	Bank	Agg		
		#	%	%	\$ (000s)	\$ %	\$ %
Small Farm	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	1	2.2	2.4	125	1.5	3.4
	Middle	38	84.4	73.7	7,146	83.8	79.3
	Upper	6	13.3	23.1	1,255	14.7	17.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	Tr Unknown			0.8			0.1
	Total		45	100.0	100.0	8,526	100.0

Originations & Purchases  
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

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

The bank’s lending activities reflect good distribution of loans among individuals of different income levels and businesses (including farms) of different sizes given the product lines offered by the bank. Lending in 2019 was comparable to 2020.

### HMDA-Reportable Lending

In 2020, the bank’s performance relative to HMDA-reportable loans is good as lending to low-income borrowers was comparable to the aggregate of lenders, but below the percentage of families by family income. The bank’s performance with regard to moderate-income borrowers was above the aggregate of lenders and comparable to the percentage of families by family income.

#### Home Purchase Loans

Home purchase loans represent 20.0 percent of the bank’s total HMDA-reportable loans in 2020. The bank made 6.7 percent of its home purchase loans to low-income borrowers, which was comparable to the 5.8 percent by aggregate lenders, but below the 13.7 percent of low-income families in the assessment area. The bank made 23.3 percent of its home purchase loans to



moderate-income borrowers, which was above the 17.3 percent by aggregate lenders and the 14.7 percent of moderate-income families in the assessment area. The bank made 23.3 percent of its home purchase loans to middle-income borrowers, which was slightly above the 19.9 percent by aggregate lenders and above the 18.2 percent of middle-income families in the assessment area. The bank made 43.3 percent of its home purchase loans to upper-income borrowers, which was comparable to the 44.8 percent by aggregate lenders, but below the 53.4 percent of upper-income families in the assessment area.

### *Refinance*

Refinance loans represent 59.3 percent of the bank's total HMDA-reportable loans in 2020. The bank made 4.5 percent of its refinance loans to low-income borrowers, which was comparable to the 3.3 percent by aggregate lenders, but below the 13.7 percent of low-income families in the assessment area. The bank made 15.7 percent of its refinance loans to moderate-income borrowers, which was above the 10.7 percentage by aggregate lenders and comparable to the 14.7 percent of moderate-income families in the assessment area. The bank made 28.1 percent of its refinance loans to middle-income borrowers, which was above the 17.9 percent by aggregate lenders and the 18.2 percent of middle-income families in the assessment area. The bank made 51.7 percent of its refinance loans to upper-income borrowers, which was comparable to the 53.2 percent by aggregate of lenders and the 53.4 percent of upper-income families in the assessment area.

The table below presents the borrower distribution of HMDA-reportable loans in the assessment area in 2020. Please refer to Appendix B for borrower distribution data for HMDA-reportable lending in 2019.

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 Indianapolis-Carmel-Anderson, IN MSA 26900</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income %	
		2020						
		Count Bank		Agg	Dollar Bank			Agg
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	2	6.7	5.8	208	2.9	2.4	13.7
	Moderate	7	23.3	17.3	882	12.3	11.6	14.7
	Middle	7	23.3	19.9	1,314	18.3	17.0	18.2
	Upper	13	43.3	44.8	4,558	63.5	57.3	53.4
	Unknown	1	3.3	12.2	212	3.0	11.7	0.0
	<b>Total</b>		<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>7,174</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	4	4.5	3.3	247	1.4	1.5	13.7
	Moderate	14	15.7	10.7	1,524	8.6	6.5	14.7
	Middle	25	28.1	17.9	3,772	21.4	14.0	18.2
	Upper	46	51.7	53.2	12,093	68.6	63.3	53.4
	Unknown	0	0.0	14.8	0	0.0	14.6	0.0
	<b>Total</b>		<b>89</b>	<b>100.0</b>	<b>100.0</b>	<b>17,636</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	1	20.0	4.3	70	12.1	2.4	13.7
	Moderate	1	20.0	11.1	89	15.3	7.3	14.7
	Middle	2	40.0	16.3	266	45.9	13.3	18.2
	Upper	1	20.0	66.5	155	26.7	74.9	53.4
	Unknown	0	0.0	1.7	0	0.0	2.0	0.0
	<b>Total</b>		<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>580</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	3.1	0	0.0	0.1	13.7
	Moderate	0	0.0	0.0	0	0.0	0.0	14.7
	Middle	0	0.0	0.0	0	0.0	0.0	18.2
	Upper	0	0.0	3.1	0	0.0	0.1	53.4
	Unknown	0	0.0	93.8	0	0.0	99.8	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	4.5	0	0.0	2.5	13.7
	Moderate	0	0.0	11.9	0	0.0	6.6	14.7
	Middle	0	0.0	17.2	0	0.0	11.6	18.2
	Upper	0	0.0	64.4	0	0.0	77.7	53.4
	Unknown	0	0.0	2.0	0	0.0	1.5	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	4.3	0	0.0	2.1	13.7
	Moderate	0	0.0	14.0	0	0.0	6.8	14.7
	Middle	0	0.0	19.7	0	0.0	15.3	18.2
	Upper	0	0.0	55.6	0	0.0	69.8	53.4
	Unknown	0	0.0	6.5	0	0.0	6.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	13.7
	Moderate	0	0.0	0.2	0	0.0	0.0	14.7
	Middle	0	0.0	0.0	0	0.0	0.0	18.2
	Upper	24	92.3	4.5	11,813	75.2	13.8	53.4
	Unknown	2	7.7	95.3	3,896	24.8	86.2	0.0
	<b>Total</b>		<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>15,709</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	7	4.7	4.1	525	1.3	1.8	13.7
	Moderate	22	14.7	12.7	2,495	6.1	8.1	14.7
	Middle	34	22.7	18.3	5,352	13.0	14.7	18.2
	Upper	84	56.0	50.7	28,619	69.6	60.1	53.4
	Unknown	3	2.0	14.2	4,108	10.0	15.3	0.0
	<b>Total</b>		<b>150</b>	<b>100.0</b>	<b>100.0</b>	<b>41,099</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

### Small Business Lending

The table below indicates good distribution of loans in the bank’s assessment area when compared to aggregate lenders and the distribution of small businesses in 2019.

In 2019, 91.6 percent of businesses in the assessment area reported revenues of \$1.0 million or less. The bank made 50.0 percent of its small business loans to businesses reporting annual revenues of \$1.0 million or less, which was comparable to the 48.0 percent by aggregate lenders. Of the bank’s loans in this revenue category, 66.7 percent of the bank’s loans were made in amounts of \$100,000 or less indicating the bank’s willingness to meet the credit needs of the smallest businesses in its assessment area.

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2019 Indianapolis-Carmel-Anderson, IN MSA 26900									
Product Type		Bank & Aggregate Lending Comparison							
		Count		Dollar		Total Businesses			
		Bank	Agg	Bank	Agg				
#	%	%	\$ 000s	\$ %	\$ %	%			
Small Business	Revenue	\$1 Million or Less	9	50.0	48.0	1,746	41.6	32.1	91.6
		Over \$1 Million	8	44.4	52.0	2,440	58.2	67.9	7.4
		Unknown	1	5.6		10	0.2		1.0
		Total	18	100.0	100.0	4,196	100.0	100.0	100.0
	Loan Size	\$100,000 or Less	9	50.0	91.1	492	11.7	29.7	
		\$100,001 - \$250,000	2	11.1	4.0	424	10.1	14.2	
		\$250,001 - \$1 Million	7	38.9	4.9	3,280	78.2	56.1	
		Total	18	100.0	100.0	4,196	100.0	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	6	66.7		286	16.4		
		\$100,001 - \$250,000	1	11.1		180	10.3		
		\$250,001 - \$1 Million	2	22.2		1,280	73.3		
		Total	9	100.0		1,746	100.0		

Originations & Purchases  
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

### Small Farm Lending

The table below indicates excellent distribution of loans in the bank’s assessment area when compared to aggregate lenders and the distribution of small farms in 2019.

In 2019, 98.7 percent of farms in the assessment area reported revenues of \$1.0 million or less. The bank made 91.1 percent of its small farm loans to farms reporting annual revenues of \$1.0 million or less, which was significantly above the 58.7 percent by aggregate lenders. Of the bank’s loans in this revenue category, 34.1 percent were made in amounts of \$100,000 or less, indicating the bank’s willingness to meet the credit needs of the smallest farms in its assessment area. Further supporting its responsiveness is the bank’s ranking in the CRA Market Peer Report, which ranks

the bank first overall in small farm loans to small farms businesses with the assessment area.

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2019 Indianapolis-Carmel-Anderson, IN MSA 26900									
Product Type		Bank & Aggregate Lending Comparison							
		Count			Dollar			Total Farms	
Revenue	Loan Size	Bank	Agg	Bank	Agg	Agg	%		
		#	%	%	\$ 000s	\$ %		\$ %	
Small Farm	Revenue	\$1 Million or Less	41	91.1	58.7	7,666	89.9	80.6	98.7
		Over \$1 Million	1	2.2	41.3	85	1.0	19.4	1.3
		Unknown	3	6.7		775	9.1		0.0
		<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>8,526</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	16	35.6	76.1	851	10.0	18.6	
		\$100,001 - \$250,000	16	35.6	13.0	2,977	34.9	30.4	
		\$250,001 - \$500,000	13	28.9	10.9	4,698	55.1	51.0	
		<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>8,526</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	14	34.1		741	9.7		
		\$100,001 - \$250,000	16	39.0		2,977	38.8		
		\$250,001 - \$500,000	11	26.8		3,948	51.5		
		<b>Total</b>	<b>41</b>	<b>100.0</b>		<b>7,666</b>	<b>100.0</b>		
Originations & Purchases									
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

The bank exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, or businesses (including farms) with gross annual revenues of \$1.0 million or less, consistent with safe and sound operations.

The bank makes limited use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- or moderate-income individuals or geographies. The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

### Community Development Lending

FFBT makes an adequate level of community development loans in the assessment area during the review period. Overall, the bank originated four community development loans totaling approximately \$2.0 million, which represents an increase from the previous examination where no community development loans were made. Of the four loans that the bank originated, one loan was a small business loan focused on economic development, specifically LMI employment. The three remaining loans were USDA's Farm Service Agency (FSA) loans to small farms to buy additional land, additional equipment, and to hire additional labor fostering additional LMI employment. The bank's loans show adequate responsiveness by focusing on economic

development through small business and small farm loans, which was highlighted as a need by one community representative.

The following table presents community development lending in the assessment area during the evaluation period.

Qualified Community Development Loans by Purpose September 26, 2017-September 20, 2021											
Indianapolis MSA	Affordable Housing		Community Services		Economic Development		Revitalize & Stabilize		Total		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$
	0	0	0	0	4	2,005	0	0	4	2,005	2.7

## INVESTMENT TEST

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

The bank made or maintained three investments during the evaluation period totaling \$855,000, which represented a significant increase by number and an increase by dollar amount from the previous evaluation, where the bank submitted no community development investment activity for review. The bank maintained two affordable housing investments, which was responsive to a need indicated by community representatives. The remaining investment primarily focused on economic development and small businesses development in low- or moderate-income areas and was new to the current period.

The following table presents community development investments in the assessment area during the evaluation period.

Qualified Community Development Investments by Purpose September 26, 2017-September 20, 2021								
Indianapolis MSA	Prior Period Investments		Current Period Investments		Total Investments		Unfunded Commitments	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	2	52	0	0	2	52	2	71

Economic Development	0	0	1	803	1	803	1	178
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Community Services	0	0	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>52</b>	<b>1</b>	<b>803</b>	<b>3</b>	<b>855</b>	<b>3</b>	<b>249</b>
<i>Note: Percentages may not add to 100.0 percent due to rounding.</i>								

FFBT also made 19 qualified donations for \$42,200 during the evaluation period. This was a notable increase from the previous evaluation where the bank made eight qualified donations totaling \$2,200. When comparing grants and donations by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the monthly average increase by dollar is 899.0 percent. The current period donations were disbursed to 10 different organizations with all dollars received by organizations promoting community services for LMI individuals or areas.

The table below presents qualified community development donations in the assessment area during the evaluation period.

<b>Qualified Community Development Donations by Purpose</b>											
<b>September 26, 2017-September 20, 2021</b>											
	<b>Affordable Housing</b>		<b>Economic Development</b>		<b>Revitalization &amp; Stabilization</b>		<b>Community Services</b>		<b>Total</b>		
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>% of Total \$</b>
<b>Indianapolis MSA</b>	0	0	0	0	0	0	19	42	19	42	10.1

## SERVICE TEST

Delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area. To the extent changes have been made, the bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly low- and moderate-income geographies and to low- and moderate-income individuals. Services do not vary in a way that inconveniences the bank's assessment area, particularly low- and moderate-income geographies and low- and moderate-income individuals. Further, the bank provides few, if any, community development services.

## **Retail Services**

The bank's retail delivery services are reasonably accessible to geographies and individuals of different income levels in its assessment area. The bank maintains three branches, each with a full-service ATM, throughout this assessment area. Two branch locations are located in middle-income census tracts, and one branch is located in an upper-income census tract. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Since the previous examination, the bank has opened one branch in this assessment area which is located in a middle-income census tract.

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

## **Community Development Services**

FFBT provides few, if any community development services. During the evaluation period, the bank provided three hours of service, an increase from the zero hours provided during the previous evaluation period. All three hours were used to conduct financial literacy courses at the same organization. The bank displayed adequate responsiveness with respect to community services as the financial literacy courses provided were specifically given to a school district where the majority of students receive free or reduced lunch prices.

External factors also affected the ability of the bank to identify and respond to community development opportunities in the assessment area during this review period. The nationwide response to the COVID-19 pandemic affected the bank's communities and its ability to interact with its community members to the extent it had during the previous review period.

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

Qualified Community Development Services by Purpose September 26, 2017-September 20, 2021											
Indianapolis MSA	Affordable Housing		Economic Development		Revitalization & Stabilization		Community Services		Total		
	#	Hrs	#	Hrs	#	Hrs	#	Hrs	#	Hrs	% of Total Hours
	0	0	0	0	0	0	0	2	3	2	3



## LAFAYETTE-WEST LAFAYETTE, INDIANA MSA #29200 – Limited Review

### SCOPE OF THE EXAMINATION

The scope of this assessment area is consistent with the scope of examination presented in the overall section of the Performance Evaluation.

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

The assessment area is comprised of two of the three counties in the MSA, Carroll and Tippecanoe Counties in their entirety, and has not changed since the previous examination. The assessment area includes 44 census tracts, of which three are designated as low-, 10 moderate-, 16 middle-, 12 upper-, and three unknown-income. The three unknown-income census tracts are predominantly where Purdue University is located. FFBT maintains operations in the Lafayette MSA assessment area through two branch offices each with a full-service ATM, one located in a moderate-income tract and one in a middle-income tract. The branch in the moderate-income tract was opened since the previous evaluation. Additionally, the bank has closed one branch in an upper-income tract.

According to the June 30, 2020 FDIC Deposit Market Share Report, FFBT is ranked 13<sup>th</sup> of 16 FDIC-insured institutions in the Lafayette MSA, holding 0.7 percent of the deposit market share. By comparison, the top three institutions by market share were: JP Morgan Chase Bank (29.0 percent), First Merchants Bank (22.7 percent), and Regions Bank (10.0 percent). Based on the 2020 HMDA Market Peer Report, FFBT ranks 35<sup>th</sup> in loan originations out of 304 HMDA reporters, with a total of 40 originations. First-ranked Purdue Federal Credit Union had 1,648 originations. The CRA Market Peer Report ranks FFBT 9<sup>th</sup> out of 67 reporters with 67 CRA-reportable loans in 2019; the first-ranked institution, JP Morgan Chase, originated 650.

The following table presents demographic data specific to the institution’s Lafayette MSA assessment area.

Assessment Area: 2020 Lafayette-West Lafayette, IN MSA 29200								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	6.8	1,168	2.7	506	43.3	8,835	20.5
Moderate-income	10	22.7	8,247	19.1	1,494	18.1	6,985	16.2
Middle-income	16	36.4	17,419	40.3	1,825	10.5	9,919	23.0
Upper-income	12	27.3	16,237	37.6	838	5.2	17,441	40.4
Unknown-income	3	6.8	109	0.3	22	20.2	0	0.0
<b>Total Assessment Area</b>	<b>44</b>	<b>100.0</b>	<b>43,180</b>	<b>100.0</b>	<b>4,685</b>	<b>10.8</b>	<b>43,180</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	5,131	410	1.0	8.0	4,068	79.3	653	12.7
Moderate-income	17,789	6,662	15.8	37.5	9,534	53.6	1,593	9.0
Middle-income	30,780	17,130	40.7	55.7	10,834	35.2	2,816	9.1
Upper-income	26,506	17,796	42.3	67.1	7,082	26.7	1,628	6.1
Unknown-income	2,386	43	0.1	1.8	1,990	83.4	353	14.8
<b>Total Assessment Area</b>	<b>82,592</b>	<b>42,041</b>	<b>100.0</b>	<b>50.9</b>	<b>33,508</b>	<b>40.6</b>	<b>7,043</b>	<b>8.5</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	257	3.8	229	3.7	27	5.7	1	1.8
Moderate-income	1,933	28.7	1,712	27.6	208	43.7	13	22.8
Middle-income	2,195	32.6	2,038	32.8	134	28.2	23	40.4
Upper-income	2,120	31.5	2,005	32.3	96	20.2	19	33.3
Unknown-income	232	3.4	220	3.5	11	2.3	1	1.8
<b>Total Assessment Area</b>	<b>6,737</b>	<b>100.0</b>	<b>6,204</b>	<b>100.0</b>	<b>476</b>	<b>100.0</b>	<b>57</b>	<b>100.0</b>
		Percentage of Total Businesses:		<b>92.1</b>		<b>7.1</b>		<b>0.8</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	12	2.8	11	2.7	1	10.0	0	0.0
Middle-income	256	60.7	249	60.4	7	70.0	0	0.0
Upper-income	154	36.5	152	36.9	2	20.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>422</b>	<b>100.0</b>	<b>412</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
		Percentage of Total Farms:		<b>97.6</b>		<b>2.4</b>		<b>0.0</b>
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Assessment Area	Lending Test	Investment Test	Service Test
Lafayette MSA	Consistent	Below	Consistent

### Lending Test

The institution's lending performance in the area is consistent with with the institution's lending performance overall in the state of Indiana. Please refer to Appendix B for geographic and borrower distribution data for HMDA-reportable lending in 2019.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Lafayette-West Lafayette, IN MSA 29200								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count		Dollar				
		Bank	Agg	Bank	Agg	Agg		
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	1.0	0	0.0	0.6	1.0
	Moderate	1	7.7	17.5	150	6.1	11.8	15.8
	Middle	7	53.8	37.4	1,201	48.8	34.6	40.7
	Upper	5	38.5	43.8	1,109	45.1	52.5	42.3
	Unknown	0	0.0	0.3	0	0.0	0.4	0.1
	<b>Total</b>		<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>2,460</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.5	0	0.0	0.3	1.0
	Moderate	0	0.0	10.3	0	0.0	6.4	15.8
	Middle	22	91.7	37.5	3,268	81.4	34.6	40.7
	Upper	2	8.3	51.7	747	18.6	58.6	42.3
	Unknown	0	0.0	0.1	0	0.0	0.1	0.1
	<b>Total</b>		<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>4,015</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.4	0	0.0	0.1	1.0
	Moderate	0	0.0	10.2	0	0.0	7.8	15.8
	Middle	1	100.0	37.5	80	100.0	38.3	40.7
	Upper	0	0.0	51.4	0	0.0	53.6	42.3
	Unknown	0	0.0	0.4	0	0.0	0.1	0.1
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	18.3	0	0.0	28.4	Multi-Family 17.2
	Moderate	0	0.0	29.6	0	0.0	25.1	27.3
	Middle	0	0.0	31.0	0	0.0	25.8	26.7
	Upper	0	0.0	14.1	0	0.0	13.8	19.1
	Unknown	0	0.0	7.0	0	0.0	6.8	9.6
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.3	0	0.0	0.2	1.0
	Moderate	0	0.0	9.4	0	0.0	5.5	15.8
	Middle	0	0.0	42.3	0	0.0	40.6	40.7
	Upper	0	0.0	48.0	0	0.0	53.7	42.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.1
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	1.0	0	0.0	0.9	1.0
	Moderate	0	0.0	9.8	0	0.0	5.0	15.8
	Middle	0	0.0	37.3	0	0.0	35.7	40.7
	Upper	0	0.0	52.0	0	0.0	58.4	42.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.1
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.6	0	0.0	0.4	1.0
	Moderate	0	0.0	22.5	0	0.0	16.1	15.8
	Middle	0	0.0	38.2	0	0.0	36.5	40.7
	Upper	0	0.0	38.8	0	0.0	47.1	42.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.1
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0.8	0	0.0	3.8	1.0
	Moderate	1	2.6	13.2	150	2.3	10.7	15.8
	Middle	30	78.9	37.6	4,549	69.4	33.7	40.7
	Upper	7	18.4	48.2	1,856	28.3	50.8	42.3
	Unknown	0	0.0	0.2	0	0.0	1.0	0.1
	<b>Total</b>		<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>6,555</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans								
Assessment Area: 2019 Lafayette-West Lafayette, IN MSA 29200								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses
		2019						
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Business	Low	0	0.0	2.6	0	0.0	1.7	3.9
	Moderate	2	11.1	30.2	534	17.8	39.0	28.6
	Middle	15	83.3	31.1	2,364	78.9	26.1	32.4
	Upper	1	5.6	32.6	100	3.3	30.2	31.8
	Unknown	0	0.0	2.0	0	0.0	2.6	3.3
	Tr Unknown			1.5			0.4	
	Total		18	100.0	100.0	2,998	100.0	100.0
Originations & Purchases								
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Farm Loans								
Assessment Area: 2019 Lafayette-West Lafayette, IN MSA 29200								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Farms
		2019						
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Farm	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	1.8	0	0.0	2.4	2.4
	Middle	39	79.6	78.2	6,769	82.9	84.3	61.0
	Upper	10	20.4	20.0	1,397	17.1	13.3	36.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.0			0.0	
	Total		49	100.0	100.0	8,166	100.0	100.0
Originations & Purchases								
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 Lafayette-West Lafayette, IN MSA 29200</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison 2020					Families by Family Income %	
		Count Bank		Agg	Dollar Bank			Agg
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	2	15.4	10.1	116	4.7	6.3	20.5
	Moderate	2	15.4	25.4	365	14.8	20.3	16.2
	Middle	2	15.4	24.4	351	14.3	24.1	23.0
	Upper	7	53.8	31.4	1,628	66.2	41.2	40.4
	Unknown	0	0.0	8.7	0	0.0	8.0	0.0
	<b>Total</b>		<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>2,460</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	1	4.2	6.2	55	1.4	3.5	20.5
	Moderate	4	16.7	16.2	472	11.8	11.3	16.2
	Middle	5	20.8	22.5	1,180	29.4	20.1	23.0
	Upper	13	54.2	39.8	2,252	56.1	48.9	40.4
	Unknown	1	4.2	15.3	56	1.4	16.2	0.0
	<b>Total</b>		<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>4,015</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	4.2	0	0.0	3.0	20.5
	Moderate	1	100.0	15.2	80	100.0	10.5	16.2
	Middle	0	0.0	24.1	0	0.0	24.2	23.0
	Upper	0	0.0	53.2	0	0.0	59.2	40.4
	Unknown	0	0.0	3.3	0	0.0	3.2	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.5
	Moderate	0	0.0	1.4	0	0.0	0.0	16.2
	Middle	0	0.0	0.0	0	0.0	0.0	23.0
	Upper	0	0.0	5.6	0	0.0	0.7	40.4
	Unknown	0	0.0	93.0	0	0.0	99.3	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	7.1	0	0.0	5.3	20.5
	Moderate	0	0.0	19.1	0	0.0	15.2	16.2
	Middle	0	0.0	27.1	0	0.0	28.2	23.0
	Upper	0	0.0	42.9	0	0.0	48.9	40.4
	Unknown	0	0.0	3.7	0	0.0	2.5	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	5.9	0	0.0	5.4	20.5
	Moderate	0	0.0	18.6	0	0.0	8.5	16.2
	Middle	0	0.0	22.5	0	0.0	19.8	23.0
	Upper	0	0.0	48.0	0	0.0	59.2	40.4
	Unknown	0	0.0	4.9	0	0.0	7.1	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	20.5
	Moderate	0	0.0	0.0	0	0.0	0.0	16.2
	Middle	0	0.0	0.0	0	0.0	0.0	23.0
	Upper	0	0.0	0.0	0	0.0	0.0	40.4
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	3	7.9	7.4	171	2.6	4.1	20.5
	Moderate	7	18.4	19.3	917	14.0	13.1	16.2
	Middle	7	18.4	22.9	1,531	23.4	19.1	23.0
	Upper	20	52.6	36.6	3,880	59.2	40.1	40.4
	Unknown	1	2.6	13.9	56	0.9	23.5	0.0
	<b>Total</b>		<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>6,555</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2019 Lafayette-West Lafayette, IN MSA 29200									
Product Type		Bank & Aggregate Lending Comparison							
		2019							
		Count		Agg %	Dollar		Agg \$ %	Total Businesses %	
Bank #	%	Bank \$ 000s	\$ %						
Small Business	Revenue	\$1 Million or Less	12	66.7	48.4	1,327	44.3	36.4	91.8
		Over \$1 Million	6	33.3	51.6	1,671	55.7	63.6	7.3
		Unknown	0	0.0		0	0.0		0.9
		<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>2,998</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	9	50.0	89.9	540	18.0	28.9	
		\$100,001 - \$250,000	5	27.8	5.2	789	26.3	18.9	
		\$250,001 - \$1 Million	4	22.2	4.9	1,669	55.7	52.2	
		<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>2,998</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	8	66.7		519	39.1		
		\$100,001 - \$250,000	3	25.0		489	36.9		
		\$250,001 - \$1 Million	1	8.3		319	24.0		
		<b>Total</b>	<b>12</b>	<b>100.0</b>		<b>1,327</b>	<b>100.0</b>		
Originations & Purchases									
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2019 Lafayette-West Lafayette, IN MSA 29200									
Product Type		Bank & Aggregate Lending Comparison							
		2019							
		Count		Agg %	Dollar		Agg \$ %	Total Farms %	
Bank #	%	Bank \$ 000s	\$ %						
Small Farm	Revenue	\$1 Million or Less	26	53.1	53.5	3,742	45.8	63.2	97.8
		Over \$1 Million	23	46.9	46.5	4,424	54.2	36.8	2.2
		Unknown	0	0.0		0	0.0		0.0
		<b>Total</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>8,166</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	20	40.8	67.6	903	11.1	15.3	
		\$100,001 - \$250,000	16	32.7	15.3	2,832	34.7	26.4	
		\$250,001 - \$500,000	13	26.5	17.1	4,431	54.3	58.2	
		<b>Total</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>8,166</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	12	46.2		632	16.9		
		\$100,001 - \$250,000	10	38.5		1,845	49.3		
		\$250,001 - \$500,000	4	15.4		1,265	33.8		
		<b>Total</b>	<b>26</b>	<b>100.0</b>		<b>3,742</b>	<b>100.0</b>		
Originations & Purchases									
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

Qualified Community Development Loans by Purpose September 26, 2017 – September 20, 2021											
Lafayette MSA	Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services		Total		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$
	0	0	1	300	0	0	0	0	1	300	0.4

**INVESTMENT TEST**

The bank’s investment performance is below its overall performance in the state of Indiana as the bank made no qualified investments.

Qualified Community Development Donations by Purpose September 26, 2017 through September 20, 2021											
Lafayette MSA	Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services		Total		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$
	0	0	0	0	0	0	9	7,350	9	7,350	1.8

**SERVICE TEST**

FFBT’s service performance is consistent with its overall performance in the state of Indiana.

Qualified Community Development Services by Purpose September 26, 2017 - September 20, 2021											
Lafayette MSA	Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services		Total		
	#	Hrs	#	Hrs	#	Hrs	#	Hrs	#	Hrs	% of Total Hours
	0	0	2	48	0	0	6	308	8	356	6.6



## TERRE HAUTE, INDIANA MSA #45460 – Limited Review

### SCOPE OF THE EXAMINATION

The scope of this assessment area is consistent with the scope of examination presented in the overall section of the Performance Evaluation.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN TERRE HAUTE MSA

The assessment area is comprised of all four counties within the MSA, Clay, Sullivan, Vermillion, and Vigo, in their entirety, and has not changed since the previous examination. The assessment area consists of 44 census tracts. Four census tracts are designated as low-income, nine as moderate-income, 20 are middle-income, and eleven are upper-income. FFBT maintains operations in the Terre Haute MSA assessment area through five branch offices, all with full-service ATMs. One branch is located in a moderate-income tract, three are located in middle-income tracts, and one branch is in an upper-income tract. The bank has a cash-only ATM in a middle-income census tract as well. Since the previous examination, the bank added a branch with an ATM in a middle-income census tract.

According to the June 30, 2020 FDIC Deposit Market Share Report, FFBT is ranked sixth of nine FDIC-insured institutions in the Terre Haute MSA, holding 6.2 percent of the deposit market share. By comparison, the top three institutions by market share were First Financial Bank (49.9 percent), Old National Bank (14.0 percent), and Terre Haute Savings Bank (10.2 percent). Based on 2020 HMDA Market Peer Report, FFBT ranks 10<sup>th</sup> in loan originations out of 229 HMDA reporters, with a total of 117 originations. First-ranked Ruoff Mortgage Company originated 865 loans. The CRA Market Peer Report ranks FFBT seventh out of 64 reporters with 107 CRA-reportable loans in 2019; the first-ranked institution, First Financial Bank, originated 562.

The following table presents demographic data specific to the institution's Terre Haute MSA assessment area.

Assessment Area: 2020 Terre Haute, IN MSA 45460								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	9.1	1,833	4.4	734	40.0	8,674	20.8
Moderate-income	9	20.5	6,812	16.3	1,703	25.0	7,336	17.6
Middle-income	20	45.5	19,180	45.9	2,140	11.2	8,479	20.3
Upper-income	11	25.0	13,931	33.4	773	5.5	17,267	41.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>44</b>	<b>100.0</b>	<b>41,756</b>	<b>100.0</b>	<b>5,350</b>	<b>12.8</b>	<b>41,756</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	3,718	1,163	2.7	31.3	1,969	53.0	586	15.8
Moderate-income	14,100	5,595	13.1	39.7	6,447	45.7	2,058	14.6
Middle-income	34,225	21,094	49.2	61.6	8,621	25.2	4,510	13.2
Upper-income	22,343	14,998	35.0	67.1	4,950	22.2	2,395	10.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>74,386</b>	<b>42,850</b>	<b>100.0</b>	<b>57.6</b>	<b>21,987</b>	<b>29.6</b>	<b>9,549</b>	<b>12.8</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	350	6.5	303	6.4	47	9.7	0	0.0
Moderate-income	1,105	20.7	962	20.2	119	24.6	24	22.6
Middle-income	2,221	41.5	1,969	41.4	203	41.9	49	46.2
Upper-income	1,675	31.3	1,527	32.1	115	23.8	33	31.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>5,351</b>	<b>100.0</b>	<b>4,761</b>	<b>100.0</b>	<b>484</b>	<b>100.0</b>	<b>106</b>	<b>100.0</b>
		Percentage of Total Businesses:		89.0		9.0		2.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	1	0.3	1	0.3	0	0.0	0	0.0
Moderate-income	4	1.2	4	1.2	0	0.0	0	0.0
Middle-income	184	54.8	182	54.5	2	100.0	0	0.0
Upper-income	147	43.8	147	44.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>336</b>	<b>100.0</b>	<b>334</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
		Percentage of Total Farms:		99.4		0.6		0.0
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Assessment Area	Lending Test	Investment Test	Service Test
Terre Haute MSA	Consistent	Below	Consistent

### LENDING TEST

The institution's lending performance in the area is consistent with with the institution's lending performance overall. Please refer to Appendix B for geographic and borrower distribution data for HMDA-reportable lending in 2019.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Terre Haute, IN MSA 45460								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count Bank		Agg	Dollar Bank		Agg	
2020								
		#	%	%	\$ (000s)	%	%	
Home Purchase	Low	1	2.3	2.4	50	1.0	1.1	2.7
	Moderate	0	0.0	12.6	0	0.0	8.5	13.1
	Middle	27	61.4	47.9	2,834	55.6	43.2	49.2
	Upper	16	36.4	37.2	2,211	43.4	47.2	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>5,095</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.4	0	0.0	0.1	2.7
	Moderate	3	4.2	7.0	187	1.8	4.6	13.1
	Middle	36	50.7	43.6	4,348	41.8	38.5	49.2
	Upper	32	45.1	49.0	5,856	56.4	56.7	35.0
	Unknown	0	0.0	0.0	0	0.0	0.1	0.0
	<b>Total</b>		<b>71</b>	<b>100.0</b>	<b>100.0</b>	<b>10,391</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	2.2	0	0.0	2.1	2.7
	Moderate	0	0.0	11.5	0	0.0	11.2	13.1
	Middle	0	0.0	50.5	0	0.0	50.8	49.2
	Upper	0	0.0	35.7	0	0.0	35.9	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	6.1	0	0.0	0.7	8.8
	Moderate	0	0.0	39.4	0	0.0	35.7	33.8
	Middle	1	100.0	30.3	210	100.0	12.6	33.2
	Upper	0	0.0	24.2	0	0.0	51.0	24.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>210</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	2.7
	Moderate	0	0.0	2.1	0	0.0	0.4	13.1
	Middle	0	0.0	40.4	0	0.0	30.8	49.2
	Upper	0	0.0	57.4	0	0.0	68.8	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	1.1	0	0.0	0.6	2.7
	Moderate	0	0.0	4.5	0	0.0	2.2	13.1
	Middle	0	0.0	58.4	0	0.0	45.0	49.2
	Upper	0	0.0	36.0	0	0.0	52.2	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	2.7	0	0.0	1.3	2.7
	Moderate	0	0.0	23.1	0	0.0	16.9	13.1
	Middle	0	0.0	44.2	0	0.0	39.7	49.2
	Upper	0	0.0	29.9	0	0.0	42.1	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	1	0.9	1.4	50	0.3	0.6	2.7
	Moderate	3	2.6	10.1	187	1.2	8.1	13.1
	Middle	64	55.2	45.8	7,392	47.1	39.1	49.2
	Upper	48	41.4	42.8	8,067	51.4	52.1	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>116</b>	<b>100.0</b>	<b>100.0</b>	<b>15,696</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Geographic Distribution of Small Business Loans</b>								
<b>Assessment Area: 2019 Terre Haute, IN MSA 45460</b>								
	<b>Tract Income Levels</b>	<b>Bank &amp; Aggregate Lending Comparison</b>						<b>Total Businesses</b>
		<b>2019</b>						
		<b>Count</b>		<b>Dollar</b>				
		<b>Bank</b>	<b>Agg</b>	<b>Bank</b>		<b>Agg</b>		
		<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>
Small Business	Low	3	6.1	8.0	1,112	10.0	8.7	6.4
	Moderate	4	8.2	17.0	283	2.5	16.7	20.6
	Middle	30	61.2	40.3	7,255	65.3	43.8	41.7
	Upper	12	24.5	32.2	2,459	22.1	30.1	31.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			2.6			0.7	
	<b>Total</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>11,109</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Geographic Distribution of Small Farm Loans</b>								
<b>Assessment Area: 2019 Terre Haute, IN MSA 45460</b>								
	<b>Tract Income Levels</b>	<b>Bank &amp; Aggregate Lending Comparison</b>						<b>Total Farms</b>
		<b>2019</b>						
		<b>Count</b>		<b>Dollar</b>				
		<b>Bank</b>	<b>Agg</b>	<b>Bank</b>		<b>Agg</b>		
		<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>
Small Farm	Low	0	0.0	0.0	0	0.0	0.0	0.3
	Moderate	5	8.6	2.0	569	7.7	2.9	1.1
	Middle	37	63.8	52.1	4,718	63.7	51.0	54.9
	Upper	16	27.6	45.3	2,117	28.6	46.1	43.7
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.6			0.0	
	<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>7,404</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 Terre Haute, IN MSA 45460</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison 2020					Families by Family Income %	
		Count Bank		Agg %	Dollar Bank			Agg %
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	6	13.6	8.3	426	8.4	4.4	20.8
	Moderate	9	20.5	24.9	1,005	19.7	17.6	17.6
	Middle	15	34.1	23.1	1,329	26.1	22.4	20.3
	Upper	12	27.3	31.6	2,219	43.6	45.5	41.4
	Unknown	2	4.5	11.9	116	2.3	10.2	0.0
	<b>Total</b>	<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>5,095</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	4	5.6	3.8	225	2.2	1.6	20.8
	Moderate	8	11.3	11.9	842	8.1	7.0	17.6
	Middle	21	29.6	17.7	2,279	21.9	13.8	20.3
	Upper	38	53.5	47.2	7,045	67.8	56.3	41.4
	Unknown	0	0.0	19.4	0	0.0	21.4	0.0
	<b>Total</b>	<b>71</b>	<b>100.0</b>	<b>100.0</b>	<b>10,391</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	7.7	0	0.0	6.0	20.8
	Moderate	0	0.0	18.1	0	0.0	13.3	17.6
	Middle	0	0.0	22.0	0	0.0	20.6	20.3
	Upper	0	0.0	45.6	0	0.0	54.4	41.4
	Unknown	0	0.0	6.6	0	0.0	5.7	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.8
	Moderate	0	0.0	3.0	0	0.0	0.3	17.6
	Middle	0	0.0	3.0	0	0.0	0.3	20.3
	Upper	0	0.0	3.0	0	0.0	0.3	41.4
	Unknown	1	100.0	90.9	210	100.0	99.1	0.0
	<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>210</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	6.4	0	0.0	1.4	20.8
	Moderate	0	0.0	17.0	0	0.0	10.0	17.6
	Middle	0	0.0	25.5	0	0.0	18.4	20.3
	Upper	0	0.0	51.1	0	0.0	70.1	41.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	10.1	0	0.0	5.3	20.8
	Moderate	0	0.0	20.2	0	0.0	17.8	17.6
	Middle	0	0.0	15.7	0	0.0	7.9	20.3
	Upper	0	0.0	47.2	0	0.0	64.0	41.4
	Unknown	0	0.0	6.7	0	0.0	5.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	20.8
	Moderate	0	0.0	0.7	0	0.0	0.3	17.6
	Middle	0	0.0	0.0	0	0.0	0.0	20.3
	Upper	0	0.0	0.0	0	0.0	0.0	41.4
	Unknown	0	0.0	99.3	0	0.0	99.7	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	10	8.6	5.8	651	4.1	2.7	20.8
	Moderate	17	14.7	17.4	1,847	11.8	11.0	17.6
	Middle	36	31.0	19.6	3,608	23.0	16.3	20.3
	Upper	50	43.1	39.1	9,264	59.0	48.0	41.4
	Unknown	3	2.6	18.0	326	2.1	22.0	0.0
	<b>Total</b>	<b>116</b>	<b>100.0</b>	<b>100.0</b>	<b>15,696</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2019 Terre Haute, IN MSA 45460									
Product Type		Bank & Aggregate Lending Comparison							
		Count		Dollar			Total Businesses		
Revenue	Loan Size	Bank	Agg	Bank	Agg	Total			
		#	%	%	\$ 000s		\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	16	32.7	41.2	1,761	15.9	32.7	89.0
		Over \$1 Million	26	53.1	58.8	8,635	77.7	67.3	9.2
		Unknown	7	14.3		713	6.4		1.9
		<b>Total</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>11,109</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	21	42.9	88.4	916	8.2	29.7	
		\$100,001 - \$250,000	12	24.5	6.6	2,056	18.5	20.6	
		\$250,001 - \$1 Million	16	32.7	5.0	8,137	73.2	49.7	
		<b>Total</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>11,109</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	10	62.5		355	20.2		
		\$100,001 - \$250,000	4	25.0		644	36.6		
		\$250,001 - \$1 Million	2	12.5		762	43.3		
		<b>Total</b>	<b>16</b>	<b>100.0</b>		<b>1,761</b>	<b>100.0</b>		

Originations & Purchases  
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2019 Terre Haute, IN MSA 45460									
Product Type		Bank & Aggregate Lending Comparison							
		Count		Dollar			Total Farms		
Revenue	Loan Size	Bank	Agg	Bank	Agg	Total			
		#	%	%	\$ 000s		\$ %	\$ %	
Small Farm	Revenue	\$1 Million or Less	53	91.4	70.0	6,102	82.4	72.1	99.4
		Over \$1 Million	5	8.6	30.0	1,302	17.6	27.9	0.6
		Unknown	0	0.0		0	0.0		0.0
		<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>7,404</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	32	55.2	65.4	1,525	20.6	19.2	
		\$100,001 - \$250,000	18	31.0	22.4	2,989	40.4	35.4	
		\$250,001 - \$500,000	8	13.8	12.2	2,890	39.0	45.4	
		<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>7,404</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	31	58.5		1,445	23.7		
		\$100,001 - \$250,000	16	30.2		2,552	41.8		
		\$250,001 - \$500,000	6	11.3		2,105	34.5		
		<b>Total</b>	<b>53</b>	<b>100.0</b>		<b>6,102</b>	<b>100.0</b>		

Originations & Purchases  
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

Qualified Community Development Loans by Purpose September 26, 2017 through September 20, 2021											
Terre Haute MSA	Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services		Total		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$
	1	300	2	1,140	4	24,000	0	0	7	25,440	34.0

### INVESTMENT TEST

The institution's investment performance in the area is below the institution's investment performance overall. The bank did not make any investments inside the assessment area during the review period.

Qualified Community Development Donations by Purpose September 26, 2017 through September 20, 2021											
Terre Haute MSA	Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services		Total		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$
	0	0	0	0	0	0	31	64	31	64	15.4

### SERVICE TEST

The institution's service performance in the area is consistent with with the service performance overall.

Qualified Community Development Services by Purpose September 26, 2017 - September 20, 2021											
Terre Haute MSA	Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services		Total		
	#	Hrs	#	Hrs	#	Hrs	#	Hrs	#	Hrs	% of Total Hours
	0	0	0	0	0	0	10	351	10	351	6.5



## STATE OF ILLINOIS

### **CRA RATING FOR ILLINOIS: Satisfactory**

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

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

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

#### **Lending Test:**

- Geographic distribution of loans reflects adequate penetration throughout the assessment area;
- The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses and farms of different sizes;
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms;
- The bank makes limited use of innovative and/or flexible lending practices in serving assessment area credit needs; and
- The bank makes an adequate level of community development loans.

#### **Investment Test:**

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

#### **Service Test:**

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

## SCOPE OF EXAMINATION

Performance within the state of Illinois was evaluated using full review examination procedures for the Danville MSA assessment area. Limited review procedures were used to evaluate the Illinois Non-MSA, given the bank's limited presence in the area. The scope of the examination is consistent with that which is defined for the whole review.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN ILLINOIS

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

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

### LENDING TEST

FFBT's performance relative to the Lending Test in the state of Illinois is High Satisfactory. The rating is primarily attributed to the bank's performance in the Danville, IL MSA #19180 due to the branching network in this area and overall lending presence.

### Geographic Distribution of Loans

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

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

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

The bank exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment areas, low-income individuals, or businesses (including farms) with gross annual revenues of \$1.0 million or less, consistent with safe and sound operations.

The bank makes limited use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- or moderate-income individuals or geographies. The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service

Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

### Community Development Lending

The bank makes an adequate level of community development loans in the state of Illinois. The bank made 11 qualified community development loans totaling approximately \$11.1 million. When comparing loans by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the increase in dollar volume by monthly average was 41.1 percent. Of the loans, the majority were originated in the IL Non-MSA assessment area, and most were for community services, at seven loans. Please refer to the individual assessment area summaries for more information.

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

Qualified Community Development Loans by Purpose September 26, 2017 - September 20, 2021										
	Affordable Housing		Economic Development		Revitalization & Stabilization		Community Services		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Danville, IL MSA #19180	2	96	0	0	0	0	1	1,280	3	1,376
Illinois Non-MSA	0	0	2	890	0	0	6	8,841	8	9,731
State of Illinois BSRA	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>96</b>	<b>2</b>	<b>890</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>10,120</b>	<b>11</b>	<b>11,107</b>

### INVESTMENT TEST

FFBT's performance relative to the Investment Test in the state of Illinois is Low Satisfactory. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. FFBT made one investment in an affordable housing initiative totaling approximately \$4.1 million. Performance is above the previous evaluation, where the bank made a similar investment totaling \$970,000. When comparing investments by the 25-month time period of the previous evaluation period and the 48-month time period of the current evaluation there was an increase by dollar by monthly average of 111.9 percent. Please see the individual assessment area summaries for further details.

The bank makes occasional use of innovative and/or complex investments to support community initiatives. The bank demonstrates adequate responsiveness to credit and community development

needs.

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

Qualified Community Development Investments by Purpose September 26, 2017 - September 20, 2021								
State of Illinois	Prior Period Investments		Current Period Investments		Total Investments		Unfunded Commitments	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	1	4,090	0	0	1	4,090	0	0
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Community Services	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>4,090</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>4,090</b>	<b>0</b>	<b>0</b>

*Note: Percentages may not add to 100.0 percent due to rounding.*

FFBT made 24 donations totaling \$41,350 in the state of Illinois during the evaluation period. When comparing grants and donations by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the decrease by dollar in monthly average is 6.2 percent. All of the donations were for community service. Of the total amount, 13 by number and \$28,500 by dollar went to support the Danville MSA assessment area. Please see the assessment area summaries for further details.

The table below presents qualified community development donations in the state of Illinois during the evaluation period.

Qualified Community Development Donations by Purpose September 26, 2017 - September 20, 2021										
	Affordable Housing		Economic Development		Revitalization & Stabilization		Community Services		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Danville, IL MSA #19180	0	0	0	0	0	0	13	29	13	29
Illinois Non-MSA	0	0	0	0	0	0	11	13	11	13
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>24</b>	<b>41</b>	<b>24</b>	<b>41</b>

## SERVICE TEST

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

### Retail Services

The bank's retail delivery services are reasonably accessible to geographies and individuals of different income levels in its assessment area. Its record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. The bank maintains five full-service branch locations within the combined assessment areas in the state of Illinois. Since the previous evaluation, the bank has closed three branches, one in a moderate-income tract, one in a middle-income tract, and one in an upper-income tract, and opened one branch in an upper-income tract.

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

### Community Development Services

The bank provides an adequate level of community development services. FFBT provided 504 hours of qualified services in the state of Illinois during the evaluation period, which is below the performance of the previous evaluation at 768. When comparing service hours by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation the decrease by monthly average of 65.8 percent. Services provided included mostly board and committee membership for non-profit organizations and financial technical assistance. The extent of the bank's involvement reflects responsiveness to the needs in the assessment area. Please refer to the individual assessment areas for more information.

External factors also affected the ability of the bank to identify and respond to community development opportunities in the assessment area during this review period. The nationwide response to the COVID-19 pandemic affected the bank's communities and its ability to interact with its community members to the extent it had during the previous review period.

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

<b>Qualified Community Development Services September 26, 2017 - September 20, 2021</b>										
	<b>Affordable Housing</b>		<b>Economic Development</b>		<b>Revitalization &amp; Stabilization</b>		<b>Community Services</b>		<b>Total</b>	
	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>	<b>#</b>	<b>Hrs</b>
<b>Danville MSA</b>	0	0	0	0	0	0	6	216	<b>6</b>	<b>216</b>
<b>IL Non-MSA</b>	0	0	1	120	0	0	2	168	<b>3</b>	<b>288</b>
<b>Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>120</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>384</b>	<b>9</b>	<b>504</b>

**DANVILLE, ILLINOIS MSA #19180 – Full Review**

**SCOPE OF THE EXAMINATION**

FFBT’s operations in Danville, IL MSA #19180 received a full scope examination review. The scope for this assessment area is consistent with the scope of examination presented in the overall section of this evaluation. Please see the detailed description of the scope contained in the introduction section.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN DANVILLE, ILLINOIS MSA #19180**

The Danville MSA assessment area is comprised of one county, Vermilion, in its entirety and remains unchanged since the last examination. The assessment area consists of 24 census tracts comprised of one low-, five moderate-, 10 middle-, and eight upper-income census tracts. The bank operates two branch offices in the assessment area, as well as two full-service ATMs.

The following table is a summary of the bank’s branch locations within the Danville MSA assessment area.

<b>First Farmers Bank and Trust Branch Locations By Census Tract Income Level (December 31, 2020)</b>				
<b>Tract Income Level</b>	<b>Number of Branches</b>	<b>Percent of Branches</b>	<b>Number of ATMs</b>	<b>Percent of ATMs</b>
Low	0	0.0	0	0.0
Moderate	0	0.0	0	0.0
Middle	1	50.0	1	50.0
Upper	1	50.0	1	50.0
Unknown	0	0.0	0	0.0
Total	2	100.0	2	100.0

The FDIC Deposit Market Share Report dated June 30, 2020 ranks FFBT fifth of 16 FDIC-insured depository institutions operating in the assessment area with an 8.4 percent market share. By comparison, the top three institutions by market share were Iroquois Federal Savings and Loan Association (22.6 percent), First Financial Bank, N.A (17.8 percent), and First Midwest Bank (13.8 percent). Based on 2020 aggregate lending data, FFBT ranked ninth in loan originations out of 130 HMDA-reporters, originating 37 HMDA-reportable loans. In comparison, Catlin Bank, the bank ranked first in the assessment area, originated 285 HMDA-reportable loans. The bank ranks fourth out of 52 CRA reporters within the assessment area, purchasing and originating 68 loans in 2019. The data shows that FFBT remains among the leaders in CRA lending despite the area’s strong competition and remains above average in HMDA lending.

The following table is a summary of the demographics of the Danville MSA assessment area. *The following presentation of key demographics used to help inform the evaluation of bank activity in its assessment area is based on a comparison of two sets of ACS data, 2006-2010 and 2011-2015.*

Assessment Area: 2020 Danville, IL MSA 19180									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	1	4.2	851	4.2	376	44.2	4,388	21.7	
Moderate-income	5	20.8	3,018	14.9	892	29.6	3,388	16.8	
Middle-income	10	41.7	9,603	47.6	1,162	12.1	4,181	20.7	
Upper-income	8	33.3	6,716	33.3	437	6.5	8,231	40.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>24</b>	<b>100.0</b>	<b>20,188</b>	<b>100.0</b>	<b>2,867</b>	<b>14.2</b>	<b>20,188</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	1,482	611	2.8	41.2	688	46.4	183	12.3	
Moderate-income	6,185	2,470	11.4	39.9	2,411	39.0	1,304	21.1	
Middle-income	17,179	10,798	49.6	62.9	4,554	26.5	1,827	10.6	
Upper-income	11,247	7,872	36.2	70.0	2,127	18.9	1,248	11.1	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>36,093</b>	<b>21,751</b>	<b>100.0</b>	<b>60.3</b>	<b>9,780</b>	<b>27.1</b>	<b>4,562</b>	<b>12.6</b>	
	Total Businesses by Tract		Businesses by Tract & Revenue Size						
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low-income	65	2.9	44	2.2	20	10.2	1	2.0	
Moderate-income	533	24.1	456	23.2	71	36.2	6	11.8	
Middle-income	971	43.8	879	44.7	69	35.2	23	45.1	
Upper-income	646	29.2	589	29.9	36	18.4	21	41.2	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>2,215</b>	<b>100.0</b>	<b>1,968</b>	<b>100.0</b>	<b>196</b>	<b>100.0</b>	<b>51</b>	<b>100.0</b>	
	Percentage of Total Businesses:			88.8		8.8		2.3	
	Total Farms by Tract		Farms by Tract & Revenue Size						
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0	
Middle-income	83	41.9	80	41.5	3	75.0	0	0.0	
Upper-income	115	58.1	113	58.5	1	25.0	1	100.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>198</b>	<b>100.0</b>	<b>193</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	
	Percentage of Total Farms:			97.5		2.0		0.5	
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS									
Note: Percentages may not add to 100.0 percent due to rounding									



## Population Characteristics

As presented in the table below, the population in the assessment area slightly decreased by 1.5 percent in the five-year period from 2010-2015. The state of Illinois had a slight increase of 0.3 percent during the same time. Both community representatives cited high taxes as a reason that people are moving from the area. One representative noted that businesses and individuals seem more interested in moving out west. Another representative noted that some people choose to live in Indiana and commute to the area for work to avoid Illinois taxes.

Danville MSA Population Change			
Area	2010 Population	2015 Population	Percent Change
Danville MSA (Vermilion County)	81,625	80,368	-1.5
State of Illinois	12,830,632	12,873,761	0.3
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 - 2015 U.S. Census Bureau American Community Survey</i>			

## Income Characteristics

Between 2010 and 2015, MFI within the assessment area remained comparable with a 0.1 percent increase, while the MFI for the state of Illinois decreased slightly by 3.7 percent. The MFI of the county is considerably lower than the MFI for the state of Illinois, which a community representative attributed to the city of Chicago skewing the overall state numbers. Both representatives also confirmed that the increase in median family income is not keeping up with inflation in the area.

Overall, the assessment area is home to 20,188 families, of which 21.7 percent are designated as low-income and 16.8 percent are moderate-income. In addition, 14.2 percent of families live below the poverty line.

Danville MSA Median Family Income Change			
Area	2010 Median Family Income (\$)	2015 Median Family Income (\$)	Percent Change (%)
Danville MSA (Vermilion County)	53,826	53,880	0.1
State of Illinois	74,306	71,546	-3.7
<i>Source: 2006 - 2010 U.S. Census Bureau American Community Survey 2011 - 2015 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

### Housing Characteristics

The assessment area has 36,093 housing units, of which 60.3 percent are owner-occupied, 27.1 percent are rental units, and 12.6 percent are vacant. There are a total of 21,751 owner-occupied housing units in the assessment area, of which 2.8 percent are located in low- and 11.4 percent are in moderate-income tracts.

A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix D. A higher ratio supports more affordable housing opportunities. Based on the 2006-2010 American Community Survey data, the Danville MSA (0.57) was significantly more affordable than the state of Illinois (0.33).

The chart below depicts housing cost burden in the assessment area and the state of Illinois. Renters and homeowners are considered “overburdened” when housing costs equal 30.0 percent or more of household income. In the assessment area, 41.0 percent of all renters experience this burden, including 70.0 percent of low-income renters and 26.0 percent of moderate-income renters. These numbers are comparable or lower to the burden experienced across renters statewide. Conversely, only 14.0 percent of homeowners experience housing cost burden, including 50.0 percent of low-income homeowners and 21.0 percent of moderate-income homeowners. These numbers are all lower or significantly lower than those of the state. Overall, this indicates that the less income a person has, the higher percentage of their total income they spend on housing.

Community representatives confirmed the data above by noting that the county has one of the most affordable housing markets. However, there is a shortage of homes available for sale, which has increased rents substantially. Another representative stated that the homes available for purchase are in poor condition. These properties are generally purchased by landlords, who are not investing money to improve the homes.

Danville MSA Housing Cost Burden						
Area	Cost Burden (\$) – Renters			Cost Burden (\$) - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Danville MSA (Vermilion County)	71.0	26.0	41.0	50.0	21.0	14.0
State of Illinois	75.0	35.0	45.0	70.0	43.0	26.0
<i>Cost Burden is housing cost that equals 30 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy</i>						

### Employment Characteristics

The table below presents employment characteristics between 2015 and 2020. Overall, unemployment rates in the assessment area and the state of Illinois declined from 2015 to 2019, however, in 2020, unemployment rates increased due to the Covid-19 pandemic. The assessment area’s unemployment rate of 8.8 percent was comparable to the state of Illinois rate of 9.4 percent.

Community representatives indicated that currently there are many available jobs, and businesses are experiencing a shortage of workers across industries. However, representatives noted that the county has one of the highest rates of infection of COVID-19, and this is causing people to not want to be in an enclosed area. In addition, enhanced unemployment benefits did not help businesses attract individuals back to the work force.

Danville MSA Unemployment Rates						
Area	2015	2016	2017	2018	2019	2020
Danville MSA (Vermilion County)	7.1	7.2	6.4	6.1	4.9	8.8
State of Illinois	6.0	5.8	5.9	4.3	3.9	9.4
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics (LAUS)</i>						

### Community Representatives

Two community representatives, with a focus on economic development and affordable housing, were contacted to increase understanding of the credit needs and market conditions within the assessment area. The representatives noted that, overall, banks are willing to provide assistance in the communities. However, one representative stated that a loan program to assist with home improvement projects would benefit the community. In addition, the representatives stated that banks could provide funding for the revitalization and stabilization program in Vermilion County to assist small business owners needing to improve their buildings. Finally, representatives noted a continued need for affordable housing and increased financial literacy class offerings.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS DANVILLE, ILLINOIS MSA #19180

### LENDING TEST

The bank demonstrates an adequate geographic distribution of loans, particularly to low- or moderate-income geographies in its assessment area. FFBT displays an excellent distribution of loans, particularly in its assessment area, of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. FFBT exhibits a good record of serving the credit needs of highly economically disadvantaged areas in the assessment area and low-income individuals consistent with safe and sound operations. The bank demonstrates limited use of innovative or flexible practices, in a safe and sound manner, to address the credit needs of low- or moderate-income individuals or geographies. Further, FFBT has made an adequate level of community development loans. There will be no discussion of home improvement or multi-family loans as originations were too low for a meaningful analysis to be conducted. Finally, when determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics (percentage of owner-occupied housing units) as it is a better measure of loan demand.

#### Geographic Distribution of Loans

The bank's lending activities reflect adequate distribution throughout the assessment area, particularly to low- or moderate-income geographies in its assessment area. The bank's assessment area includes one low-, five moderate-, 10 middle-, and eight upper-income census tracts.

During this evaluation, there were no conspicuous census tract lending gaps within the assessment area. In 2020, within the assessment area's 24 census tracts, the bank originated HMDA and CRA loans in 18 of the census tracts, or 75.0 percent. Similarly, in 2019 the bank originated such loans in 15 census tracts, or 62.5 percent. The bank did not have lending penetration in the low-income census tract for either HMDA or CRA loans. The lending in moderate-income census tracts was very similar in both 2020 and 2019 at 40.0 percent and 20.0 percent, respectively. Overall, the dispersion analysis reveals that the bank continues to serve its assessment area.

#### HMDA-Reportable Lending

The geographic distribution of HMDA-reportable loans reflects adequate penetration throughout the Danville MSA assessment area. Overall, lending in low-income tracts is comparable to the aggregate and slightly below the demographic of the percent of owner-occupied housing in these census tracts. In moderate-income census tracts, the bank performed slightly below aggregate and below the demographic. Lending in 2019 was comparable to 2020.

### *Home Purchase Loans*

Home purchase loans represent 51.4 percent of the bank's totally HMDA-reportable loans in 2020. FFBT did not originate any home purchase loans in low-income census tracts. The bank's performance was comparable to the 1.0 percent by aggregate lenders and slightly below the 2.8 percent of owner-occupied housing in these census tracts. FFBT also did not originate any home purchase loans in moderate-income census tracts. The bank's performance was slightly below the 3.2 percent of aggregate lenders and below the 11.4 percent of owner-occupied housing in these census tracts. The bank made 73.7 percent of its home purchase loans in middle-income census tracts, which was significantly above the 47.3 percent by aggregate lenders and the 49.6 percent of owner-occupied housing in these census tracts. FFBT made 26.3 percent of its home purchase loans in upper-income census tracts. The bank's performance was significantly below the 48.6 percent made by aggregate lenders and below the 36.2 percent of owner-occupied housing in these census tracts.

### *Refinance Loans*

Refinance loans represent 40.5 percent of the bank's total HMDA-reportable loans in 2020. FFBT did not originate any refinance loans in low-income census tracts. The bank's performance was comparable to the 0.6 percent by aggregate lenders and slightly below the 2.8 percent of owner-occupied housing in these census tracts. FFBT also did not originate any refinance loans in moderate-income census tracts. The bank's performance was slightly below the 2.7 percent of aggregate lenders and below the 11.4 percent of owner-occupied housing in these census tracts. The bank made 86.7 percent of its refinance loans in middle-income census tracts, which was significantly above the 46.7 percent by aggregate lenders and the 49.6 percent of owner-occupied housing in these census tracts. FFBT made 13.3 percent of its refinance loans in upper-income census tracts. The bank's performance was significantly below the 49.9 percent made by aggregate lenders and the 36.2 percent of owner-occupied housing in these census tracts.

The table below presents the geographic distribution of HMDA-reportable loans in the assessment area in 2020. Please refer to Appendix B for geographic distribution data for HMDA-reportable lending in 2019.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Danville, IL MSA 19180								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		Count Bank		Agg %	Dollar Bank			
		#	%		\$ (000s)	\$ %		
Home Purchase	Low	0	0.0	1.0	0	0.0	0.5	2.8
	Moderate	0	0.0	3.2	0	0.0	2.4	11.4
	Middle	14	73.7	47.3	1,154	68.0	42.0	49.6
	Upper	5	26.3	48.6	542	32.0	55.1	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>1,696</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.6	0	0.0	0.5	2.8
	Moderate	0	0.0	2.7	0	0.0	1.7	11.4
	Middle	13	86.7	46.7	1,212	86.6	42.7	49.6
	Upper	2	13.3	49.9	188	13.4	55.2	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>1,400</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	
Home Improvement	Low	0	0.0	2.7	0	0.0	1.9	2.8
	Moderate	0	0.0	13.5	0	0.0	5.8	11.4
	Middle	1	100.0	35.1	94	100.0	33.6	49.6
	Upper	0	0.0	48.6	0	0.0	58.7	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>94</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	4.8	0	0.0	1.3	Multi-Family 12.2
	Moderate	0	0.0	19.0	0	0.0	10.9	21.1
	Middle	1	50.0	52.4	181	53.9	26.3	37.8
	Upper	1	50.0	23.8	155	46.1	61.5	29.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>336</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	2.8
	Moderate	0	0.0	12.5	0	0.0	5.3	11.4
	Middle	0	0.0	12.5	0	0.0	6.7	49.6
	Upper	0	0.0	75.0	0	0.0	88.0	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	4.5	0	0.0	0.8	2.8
	Moderate	0	0.0	4.5	0	0.0	1.0	11.4
	Middle	0	0.0	50.0	0	0.0	31.8	49.6
	Upper	0	0.0	40.9	0	0.0	66.4	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	1.7	0	0.0	1.1	2.8
	Moderate	0	0.0	1.7	0	0.0	1.0	11.4
	Middle	0	0.0	50.0	0	0.0	45.7	49.6
	Upper	0	0.0	46.6	0	0.0	52.3	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	1.0	0	0.0	0.6	2.8
	Moderate	0	0.0	3.5	0	0.0	2.7	11.4
	Middle	29	78.4	46.8	2,641	74.9	41.0	49.6
	Upper	8	21.6	48.8	885	25.1	55.7	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>3,526</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data  
*Note: Percentages may not add to 100.0 percent due to rounding*

### Small Business Lending

The table below indicates poor distribution of small business loans in the bank’s assessment area when compared to aggregate lenders and the distribution of small businesses. In 2019, FFBT did not originate any small business loans in low-income census tracts, which was slightly below the 3.7 percent by aggregate lenders and the 2.9 percent of businesses in these census tracts. FFBT originated one small business loan, or 2.6 percent of its lending, in moderate-income census tracts, which was significantly below the 18.0 percent by aggregate lenders and the 23.2 percent of businesses in these census tracts. The bank made 64.1 percent of small business loans in middle-income census tracts, which significantly exceeded the 39.0 percent by aggregate lenders and the 44.6 percent of businesses in these census tracts. FFBT made 33.3 percent of small business loans in upper-income census tracts, which was slightly below the 37.9 percent by aggregate lenders, but slightly above the 29.3 percent of businesses in these census tracts.

<b>Geographic Distribution of Small Business Loans</b>								
<b>Assessment Area: 2019 Danville, IL MSA 19180</b>								
	Tract Income Levels	<b>Bank &amp; Aggregate Lending Comparison</b>						Total Businesses %
		2019						
		Count		Dollar				
		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank \$ %	Agg \$ %	
Small Business	Low	0	0.0	3.7	0	0.0	5.5	2.9
	Moderate	1	2.6	18.0	100	2.7	24.5	23.2
	Middle	25	64.1	39.0	2,230	60.1	37.2	44.6
	Upper	13	33.3	37.9	1,380	37.2	32.4	29.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			1.4			0.4	
	<b>Total</b>		<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>3,710</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

### Small Farm Lending

The table below demonstrates adequate distribution of loans in the bank’s assessment area when compared to aggregate lenders and the distribution of small farms in 2019. As indicated earlier the assessment area contains no small farms in low-and moderate-income census tracts, so the bank made no loans in these tracts, comparable to aggregate. Given the lack of small farms in these tracts, this analysis is not impactful on the overall rating. However, the bank made 44.8 percent of its small farm loans in middle-income census tracts, which was above the 34.5 percent by aggregate lenders and slightly above the 40.5 percent of farms in these census tracts. The bank made 55.2 percent of its small farm loans in upper-income census tracts, which was below the 64.2 percent by aggregate lenders and slightly below the 59.5 percent of farms in these census tracts.

Geographic Distribution of Small Farm Loans								
Assessment Area: 2019 Danville, IL MSA 19180								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Farms
		2019						
		Count		Dollar				
		Bank	Agg	Bank	Agg	Agg		
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Farm	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.7	0	0.0	3.5	0.0
	Middle	13	44.8	34.5	1,025	23.8	33.1	40.5
	Upper	16	55.2	64.2	3,276	76.2	63.3	59.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.7			0.1	
	Total	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>4,301</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

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

The bank’s lending activities reflect excellent distribution of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank.

### HMDA-Reportable Lending

In 2020, the bank’s performance relative to HMDA-reportable loans is good as the bank by percentage was higher than the aggregate lenders in 2020 in originations to low- and moderate-income borrowers. Lending in 2019 was comparable to 2020.

#### Home Purchase Loans

Home purchase loans represent 51.4 percent of the bank’s total HMDA-reportable loans in 2020. The bank made 15.8 percent of its home purchase loans to low-income borrowers, which is above the 7.6 percent by aggregate lenders; however, performance was below the 21.7 percent of low-income families in the assessment area. The bank made 15.8 percent of its home purchase loans to moderate-income borrowers, which was slightly below the 18.6 percent by aggregate lenders, but comparable to the 16.8 percent of moderate-income families in the assessment area. The bank made 31.6 percent of its home purchase loans to middle-income borrowers, which was above the 25.4 percent by aggregate lenders and the 20.7 percent of middle-income families in the assessment area. The bank made 31.6 percent of its home purchase loans to upper-income borrowers, which was comparable to the 33.0 percent by the aggregate lenders; however, performance was below the 40.8 percent of upper-income families in the assessment area.



### *Refinance Loans*

Refinance loans represent 40.5 percent of the bank's total HMDA-reportable loans in 2020. The bank did not originate any refinance loans to low-income borrowers, which was slightly below the 3.2 percent by aggregate lenders and significantly below the 21.7 percent of low-income families in the assessment area. The bank made 20.0 percent of its refinance loans to moderate-income borrowers, which was above the 11.4 percent by aggregate lenders and slightly above the 16.8 percent of moderate-income families in the assessment area. The bank made 40.0 percent of its refinance loans to middle-income borrowers, which was significantly above the aggregate lender performance of 19.3 percent and the 20.7 percent of middle-income families in the assessment area. The bank made 33.3 percent of its refinance loans to upper-income borrowers, which was significantly below the 49.6 percent by aggregate lenders and below the 40.8 percent of upper-income families in the assessment area.

The table below presents the borrower distribution of HMDA-reportable loans in the assessment area in 2020. Please refer to Appendix B for borrower distribution data for HMDA-reportable lending in 2019.

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 Danville, IL MSA 19180</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income %	
		2020						
		Count Bank		Agg	Dollar Bank			Agg
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	3	15.8	7.6	185	10.9	4.4	21.7
	Moderate	3	15.8	18.6	256	15.1	13.1	16.8
	Middle	6	31.6	25.4	462	27.2	23.6	20.7
	Upper	6	31.6	33.0	771	45.5	43.3	40.8
	Unknown	1	5.3	15.4	22	1.3	15.6	0.0
	<b>Total</b>		<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>1,696</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	3.2	0	0.0	1.4	21.7
	Moderate	3	20.0	11.4	171	12.2	7.1	16.8
	Middle	6	40.0	19.3	418	29.9	16.1	20.7
	Upper	5	33.3	49.6	797	56.9	57.2	40.8
	Unknown	1	6.7	16.4	14	1.0	18.1	0.0
	<b>Total</b>		<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>1,400</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	21.7
	Moderate	0	0.0	10.8	0	0.0	4.4	16.8
	Middle	0	0.0	10.8	0	0.0	7.2	20.7
	Upper	1	100.0	75.7	94	100.0	86.5	40.8
	Unknown	0	0.0	2.7	0	0.0	1.9	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>94</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	21.7
	Moderate	0	0.0	0.0	0	0.0	0.0	16.8
	Middle	0	0.0	4.8	0	0.0	1.5	20.7
	Upper	0	0.0	4.8	0	0.0	3.2	40.8
	Unknown	2	100.0	90.5	336	100.0	95.2	0.0
	<b>Total</b>		<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>336</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	21.7
	Moderate	0	0.0	25.0	0	0.0	12.0	16.8
	Middle	0	0.0	25.0	0	0.0	26.7	20.7
	Upper	0	0.0	50.0	0	0.0	61.2	40.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	18.2	0	0.0	6.6	21.7
	Moderate	0	0.0	13.6	0	0.0	21.4	16.8
	Middle	0	0.0	18.2	0	0.0	7.4	20.7
	Upper	0	0.0	40.9	0	0.0	56.5	40.8
	Unknown	0	0.0	9.1	0	0.0	8.1	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	21.7
	Moderate	0	0.0	0.0	0	0.0	0.0	16.8
	Middle	0	0.0	0.0	0	0.0	0.0	20.7
	Upper	0	0.0	0.0	0	0.0	0.0	40.8
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	3	8.1	5.2	185	5.2	2.6	21.7
	Moderate	6	16.2	14.2	427	12.1	9.1	16.8
	Middle	12	32.4	21.0	880	25.0	17.8	20.7
	Upper	12	32.4	39.9	1,662	47.1	46.2	40.8
	Unknown	4	10.8	19.7	372	10.6	24.3	0.0
	<b>Total</b>		<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>3,526</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

### Small Business Lending

The table below indicates an excellent distribution of loans in the bank’s assessment area when compared to aggregate lenders and the percentages of small businesses in the assessment area in 2019. Approximately 88.7 percent of businesses in the assessment area reported gross annual revenue of \$1.0 million or less. The bank made 59.0 percent of its small business loans to these businesses, which was above the 43.7 percent by aggregate lenders, but significantly below the percentage of total businesses. Of the bank’s loans in this revenue category, 78.3 percent were made in amounts of \$100,000 or less, reflecting good responsiveness to credit needs of small businesses.

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2019 Danville, IL MSA 19180									
Product Type		Bank & Aggregate Lending Comparison							
		2019			2019		Total Businesses		
		Count		Dollar		Total Businesses			
Revenue	Loan Size	Loan Size & Rev \$1 Mill or Less	Bank	Agg	Bank		Agg	%	
			#	%	%	\$ 000s	\$ %		\$ %
Small Business	Revenue	\$1 Million or Less	23	59.0	43.7	1,791	48.3	35.2	88.7
		Over \$1 Million	7	17.9	56.3	1,049	28.3	64.8	9.1
		Unknown	9	23.1		870	23.5		2.2
		<b>Total</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>3,710</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	30	76.9	92.4	1,307	35.2	39.1	
		\$100,001 - \$250,000	6	15.4	4.6	853	23.0	19.5	
		\$250,001 - \$1 Million	3	7.7	3.0	1,550	41.8	41.5	
		<b>Total</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>3,710</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	18	78.3		688	38.4		
		\$100,001 - \$250,000	4	17.4		603	33.7		
		\$250,001 - \$1 Million	1	4.3		500	27.9		
		<b>Total</b>	<b>23</b>	<b>100.0</b>		<b>1,791</b>	<b>100.0</b>		
Originations & Purchases									
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

### Small Farm Lending

The table below indicates an excellent distribution of loans in the bank’s assessment area when compared to aggregate lenders and the percentages of total farms in the assessment area in 2019. Approximately 97.3 percent of farms in the assessment area reported gross annual revenue of \$1.0 million or less. The bank made 96.6 percent of its small farm loans to these farms, which exceeded the 53.4 percent by aggregate lenders and was comparable to the percentage of total farms. Of the bank’s loans in this revenue category, 53.6 percent were in loan amounts of \$100,000 or less, demonstrating the bank’s responsiveness to the credit needs of small farms.

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2019 Danville, IL MSA 19180									
Product Type		Bank & Aggregate Lending Comparison							
		2019							
		Count		Dollar			Total Farms		
		Bank	Agg	Bank	Agg			Total Farms	
		#	%	%	\$ 000s	\$ %	\$ %	%	
Small Farm	Revenue	\$1 Million or Less	28	96.6	53.4	4,241	98.6	75.8	97.3
		Over \$1 Million	1	3.4	46.6	60	1.4	24.2	2.3
		Unknown	0	0.0		0	0.0		0.5
		<b>Total</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>4,301</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	16	55.2	74.3	672	15.6	19.1	
		\$100,001 - \$250,000	7	24.1	16.2	1,066	24.8	35.7	
		\$250,001 - \$500,000	6	20.7	9.5	2,563	59.6	45.2	
		<b>Total</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>4,301</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	15	53.6		612	14.4		
		\$100,001 - \$250,000	7	25.0		1,066	25.1		
		\$250,001 - \$500,000	6	21.4		2,563	60.4		
		<b>Total</b>	<b>28</b>	<b>100.0</b>		<b>4,241</b>	<b>100.0</b>		
Originations & Purchases									
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

The bank exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, or businesses (including farms) with gross annual revenues of \$1.0 million or less, consistent with safe and sound operations.

The bank makes limited use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- or moderate-income individuals or geographies. The bank utilizes federal and state government assistance loan programs tailored to meet the needs of its assessment area such as Small Business Administration Loan Programs (SBA), Farm Service Agency Loan Programs (FSA), FHLB HOP Loans, and a credit builder program offered within their respective assessment areas.

### Community Development Lending

FFBT makes an adequate level of community development loans. The bank made three loans totaling \$1.4 million dollars, which represents an increase of one loan from the previous evaluation. When comparing loans by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the decrease in dollar volume by monthly average was 78.2 percent. A significant portion of community development loans were extended to operate Senior Crimestopper programs through the Senior Housing Crime Prevention Foundation's CRA Partners program at two elderly housing facilities in the assessment area with a majority low- and moderate-income residents. This national program helps to prevent abuse, theft, fraud, and unethical behavior against vulnerable adults including through financial education resources provided to both residents and facility staff. The two affordable housing loans were also

responsive to needs identified by the community representatives.

The following table presents community development loans in the assessment area during the evaluation period.

Qualified Community Development Loans by Type September 26, 2017 – September 20, 2021										
Area	Affordable Housing		Community Services		Economic Development		Revitalize & Stabilize		Total	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Danville MSA	2	96	1	1,280	0	0	0	0	3	1,376
<b>Total</b>	<b>2</b>	<b>96</b>	<b>1</b>	<b>1.3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>1,376</b>

### INVESTMENT TEST

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

The bank made one qualified investment during the evaluation period totaling \$4.1 million. At the previous examination, the bank also made one investment, but when comparing investments by the 25-month time period of the previous evaluation period and the 48-month time period of the current evaluation, there was a monthly average increase by dollar of 111.9 percent. Additionally, the investment was made through a Low-Income Housing Tax Credit designed to invest in the rehabilitation of an apartment building designated for affordable housing. Per discussion with a community representative, rents have increased substantially, and affordable housing remains a need in the area.

The following table presents community development investments in the assessment area during the evaluation period.

Qualified Community Development Investments September 26, 2017 – September 20, 2021												
	Prior Period Investments		Affordable Housing		Community Services		Economic Development		Revitalize & Stabilize		Total	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Danville MSA	0	0	1	4,090	0	0	0	0	0	0	1	4,090

FFBT made 13 donations totaling \$28,500 during the evaluation period. When comparing grants and donations by the 25-month time period of the previous evaluation period and the 48-month

period of the current evaluation, the increase by dollar in monthly average is 40.9 percent. There were a total of five organizations who engaged in community development activities that received such donations.

The table below presents qualified community development donations in the assessment area during the evaluation period.

Qualified Community Development Donations by Purpose September 26, 2017 - September 20, 2021											
Danville MSA	Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services		Total		
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	% of total \$
	0	0	0	0	0	0	0	13	29	13	29

## SERVICE TEST

The bank’s delivery systems are reasonably accessible to geographies and individuals of different income levels. The closing of the branch offices has not generally adversely affected low-and moderate-income geographies and/or low- and moderate-income individuals. Business hours and banking services are reasonable and do not vary in a way that inconveniences low- and moderate-income individuals or geographies. In addition, the bank provides an adequate level of community development services.

## Retail Services

The bank’s retail delivery services are reasonably accessible to geographies and individuals of different income levels in its assessment area. The bank operates two branch offices in the assessment area, as well as two full-service ATMs (one within a middle- and the other in an upper-income census tract). To the extent changes have been made, its record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. The bank closed two branch offices, one in Hoopeston, IL which is approximately 25 miles north of Danville, IL and the other in Danville, IL, the latter resulting from an automobile incident rendering the branch too costly to repair. Its services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals. Both offices have standard hours from 9:00 a.m. to 4:00 p.m., Monday through Thursday and are open until 5:00 p.m. on Fridays with extended drive-thru hours including Saturdays. Applications for all loan and deposit products are accepted at each branch location. Additionally, mortgage applications are accepted online through the bank’s website. Alternative delivery systems include ATMs, internet banking, and mobile banking.

### Community Development Services

The bank provides an adequate level of community development services. The bank provided 216 hours of service, which was a decrease from the previous evaluation where the bank provided 684 hours of service in the assessment area. When comparing service hours by the 25-month time period of the previous evaluation period and the 48-month period of the current evaluation, the decrease by monthly average of 83.6 percent. Services in the current period were spread across two organizations involving bank staff participating on organizational boards and providing financial technical assistance, all responsive to the needs of the community.

External factors also affected the ability of the bank to identify and respond to community development opportunities in the assessment area during this review period. The nationwide response to the COVID-19 pandemic affected the bank’s communities and its ability to interact with its community members to the extent it had during the previous review period.

Qualified Community Development Services by Type September 26, 2017 – September 20, 2021											
Danville MSA	Affordable Housing		Community Services		Economic Development		Revitalize & Stabilize		Total		
	#	Hrs	#	Hrs	#	Hrs	#	Hrs	#	Hrs	% of Total Hours
	0	0	6	216	0	0	0	0	6	216	4.0

## ILLINOIS NON-MSA – Limited Review

### SCOPE OF THE EXAMINATION

The scope of this assessment area is consistent with the scope of examination presented in the overall section of the Performance Evaluation.

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

The assessment area is comprised of four counties, Clark, Coles, Douglas, and Edgar, in their entirety, and has not changed since the previous examination. The assessment area consists of 26 census tracts. Four census tracts are designated as moderate-income, 19 are middle-income, two are upper-income, and one is unknown-income. The unknown-income tract is predominantly the location of Eastern Illinois University, and seven census tracts located in Coles County were designated as distressed middle-income tracts due to poverty levels for the duration of the review period. FFBT maintains operations in the IL Non-MSA assessment area through three branch offices, two located in middle-income tracts (one with a full-service ATM, one without an ATM), and one branch in a moderate-income tract with a full-service ATM. The assessment area is located just south of the Danville MSA. There have been no changes to branches or ATMs since the previous examination.

According to the June 30, 2020 FDIC Deposit Market Share Report, FFBT is ranked fifth of 20 FDIC-insured institutions in the IL Non-MSA, holding 5.1 percent of the deposit market share. By comparison, the top three institutions by market share were First Mid Bank and Trust (38.9 percent), Prospect Bank (9.1 percent), and First Neighbor Bank (6.5 percent). Based on 2020 HMDA Market Peer Report, FFBT ranks 12<sup>th</sup> in loan originations out of 159 HMDA reporters, with a total of 42 originations compared to 338 loans reported by first-ranked First Mid Bank and Trust. The CRA Market Peer Report ranks FFBT fifth out of 53 reporters with 119 CRA-reportable loans in 2019; the first ranked institution, First Mid Bank and Trust, originated 495.

The following table presents demographic data specific to the institution’s IL Non-MSA assessment area.



Assessment Area: 2020 IL Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	6,198	22.5
Moderate-income	4	15.4	5,017	18.2	893	17.8	4,964	18.0
Middle-income	19	73.1	19,303	70.0	2,156	11.2	5,878	21.3
Upper-income	2	7.7	3,041	11.0	186	6.1	10,525	38.2
Unknown-income	1	3.8	204	0.7	76	37.3	0	0.0
<b>Total Assessment Area</b>	<b>26</b>	<b>100.0</b>	<b>27,565</b>	<b>100.0</b>	<b>3,311</b>	<b>12.0</b>	<b>27,565</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	9,411	4,804	16.3	51.0	3,368	35.8	1,239	13.2
Middle-income	33,098	21,034	71.4	63.6	8,515	25.7	3,549	10.7
Upper-income	4,746	3,502	11.9	73.8	958	20.2	286	6.0
Unknown-income	1,098	126	0.4	11.5	737	67.1	235	21.4
<b>Total Assessment Area</b>	<b>48,353</b>	<b>29,466</b>	<b>100.0</b>	<b>60.9</b>	<b>13,578</b>	<b>28.1</b>	<b>5,309</b>	<b>11.0</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	897	22.9	797	22.7	90	27.5	10	11.6
Middle-income	2,639	67.3	2,353	67.1	214	65.4	72	83.7
Upper-income	342	8.7	318	9.1	20	6.1	4	4.7
Unknown-income	42	1.1	39	1.1	3	0.9	0	0.0
<b>Total Assessment Area</b>	<b>3,920</b>	<b>100.0</b>	<b>3,507</b>	<b>100.0</b>	<b>327</b>	<b>100.0</b>	<b>86</b>	<b>100.0</b>
		Percentage of Total Businesses:		89.5		8.3		2.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	30	5.9	28	5.6	2	20.0	0	0.0
Middle-income	426	84.0	418	84.1	8	80.0	0	0.0
Upper-income	51	10.1	51	10.3	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>507</b>	<b>100.0</b>	<b>497</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
		Percentage of Total Farms:		98.0		2.0		0.0
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Assessment Area	Lending Test	Investment Test	Service Test
IL Non-MSA	Above	Below	Consistent

### LENDING TEST

The institution's lending performance in the area is above the institution's lending performance in the state overall. Please refer to Appendix B for geographic and borrower distribution data for HMDA-reportable lending in 2019.

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2020 IL Non MSA							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2020		2020			
		Count Bank	Agg	Dollar Bank	Agg		
		#	%	%	\$ (000s)	%	%
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	6	50.0	21.2	291	31.2	16.3
	Middle	6	50.0	65.9	642	68.8	71.4
	Upper	0	0.0	12.4	0	0.0	11.9
	Unknown	0	0.0	0.6	0	0.0	0.4
	<b>Total</b>		<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>933</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	11	39.3	9.7	1,419	36.0	16.3
	Middle	17	60.7	75.9	2,518	64.0	71.4
	Upper	0	0.0	14.1	0	0.0	11.9
	Unknown	0	0.0	0.4	0	0.0	0.4
	<b>Total</b>		<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>3,937</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	1	50.0	17.1	176	53.3	16.3
	Middle	1	50.0	65.9	154	46.7	71.4
	Upper	0	0.0	17.1	0	0.0	11.9
	Unknown	0	0.0	0.0	0	0.0	0.4
	<b>Total</b>		<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>330</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	33.3	0	0.0	41.1
	Middle	0	0.0	50.0	0	0.0	18.6
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	16.7	0	0.0	40.3
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	7.1	0	0.0	12.5
	Middle	0	0.0	85.7	0	0.0	79.1
	Upper	0	0.0	7.1	0	0.0	8.3
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	7.4	0	0.0	4.3
	Middle	0	0.0	77.8	0	0.0	61.0
	Upper	0	0.0	14.8	0	0.0	34.7
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	17.0	0	0.0	11.8
	Middle	0	0.0	72.3	0	0.0	71.8
	Upper	0	0.0	10.6	0	0.0	16.4
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	18	42.9	15.1	1,886	36.3	11.5
	Middle	24	57.1	71.2	3,314	63.7	71.4
	Upper	0	0.0	13.2	0	0.0	16.5
	Unknown	0	0.0	0.5	0	0.0	2.3
	<b>Total</b>		<b>42</b>	<b>100.0</b>	<b>100.0</b>	<b>5,200</b>	<b>100.0</b>
Originations & Purchases							
2016 FFIEC Census Data							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Geographic Distribution of Small Business Loans								
Assessment Area: 2019 IL Non MSA								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses
		2019						
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Business	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	13	33.3	15.0	720	21.4	13.6	23.4
	Middle	26	66.7	72.8	2,641	78.6	77.9	67.2
	Upper	0	0.0	9.5	0	0.0	6.7	8.4
	Unknown	0	0.0	1.0	0	0.0	1.5	1.0
	Tr Unknown			1.7			0.2	
	Total		39	100.0	100.0	3,361	100.0	100.0
Originations & Purchases								
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Farm Loans								
Assessment Area: 2019 IL Non MSA								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Farms
		2019						
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Farm	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	3	3.8	2.6	547	5.7	2.2	5.6
	Middle	77	96.3	78.5	9,036	94.3	72.8	84.3
	Upper	0	0.0	18.0	0	0.0	24.9	10.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.9			0.1	
	Total		80	100.0	100.0	9,583	100.0	100.0
Originations & Purchases								
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 IL Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income	
		2020						
		Count Bank		Agg	Dollar Bank			Agg
		#	%	%	\$(000s)	\$ %	\$ %	%
Home Purchase	Low	2	16.7	13.9	109	11.7	7.4	22.5
	Moderate	2	16.7	28.5	94	10.1	23.3	18.0
	Middle	2	16.7	21.5	289	31.0	23.6	21.3
	Upper	6	50.0	22.0	441	47.3	32.2	38.2
	Unknown	0	0.0	14.1	0	0.0	13.5	0.0
	<b>Total</b>		<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>933</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	2	7.1	5.0	139	3.5	2.2	22.5
	Moderate	8	28.6	14.9	691	17.6	10.1	18.0
	Middle	6	21.4	21.0	677	17.2	17.5	21.3
	Upper	12	42.9	46.9	2,430	61.7	56.9	38.2
	Unknown	0	0.0	12.2	0	0.0	13.3	0.0
	<b>Total</b>		<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>3,937</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	9.8	0	0.0	6.5	22.5
	Moderate	0	0.0	22.0	0	0.0	12.0	18.0
	Middle	0	0.0	9.8	0	0.0	7.2	21.3
	Upper	2	100.0	46.3	330	100.0	60.5	38.2
	Unknown	0	0.0	12.2	0	0.0	13.8	0.0
	<b>Total</b>		<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>330</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	22.5
	Moderate	0	0.0	0.0	0	0.0	0.0	18.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.3
	Upper	0	0.0	0.0	0	0.0	0.0	38.2
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	14.3	0	0.0	17.7	22.5
	Moderate	0	0.0	7.1	0	0.0	2.2	18.0
	Middle	0	0.0	35.7	0	0.0	31.1	21.3
	Upper	0	0.0	35.7	0	0.0	46.2	38.2
	Unknown	0	0.0	7.1	0	0.0	2.8	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	11.1	0	0.0	6.9	22.5
	Moderate	0	0.0	14.8	0	0.0	7.2	18.0
	Middle	0	0.0	22.2	0	0.0	15.5	21.3
	Upper	0	0.0	48.1	0	0.0	67.4	38.2
	Unknown	0	0.0	3.7	0	0.0	3.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	22.5
	Moderate	0	0.0	0.0	0	0.0	0.0	18.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.3
	Upper	0	0.0	0.0	0	0.0	0.0	38.2
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	4	9.5	9.1	248	4.8	4.2	22.5
	Moderate	10	23.8	20.6	785	15.1	14.6	18.0
	Middle	8	19.0	20.6	966	18.6	18.7	21.3
	Upper	20	47.6	34.6	3,201	61.6	43.6	38.2
	Unknown	0	0.0	15.2	0	0.0	18.9	0.0
	<b>Total</b>		<b>42</b>	<b>100.0</b>	<b>100.0</b>	<b>5,200</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data Note: Percentages may not add to 100.0 percent due to rounding								

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2019 IL Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		2019							
		Count		Agg %	Dollar		Agg \$ %	Total Businesses %	
Bank #	%	Bank \$ 000s	\$ %						
Small Business	Revenue	\$1 Million or Less	28	71.8	51.0	1,570	46.7	33.8	89.3
		Over \$1 Million	4	10.3	49.0	1,505	44.8	66.2	8.6
		Unknown	7	17.9		286	8.5		2.1
		<b>Total</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>3,361</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	30	76.9	89.9	1,200	35.7	33.3	
		\$100,001 - \$250,000	8	20.5	5.1	1,161	34.5	16.0	
		\$250,001 - \$1 Million	1	2.6	5.0	1,000	29.8	50.7	
		<b>Total</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>3,361</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	22	78.6		814	51.8		
		\$100,001 - \$250,000	6	21.4		756	48.2		
		\$250,001 - \$1 Million	0	0.0		0	0.0		
		<b>Total</b>	<b>28</b>	<b>100.0</b>		<b>1,570</b>	<b>100.0</b>		
Originations & Purchases									
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2019 IL Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		2019							
		Count		Agg %	Dollar		Agg \$ %	Total Farms %	
Bank #	%	Bank \$ 000s	\$ %						
Small Farm	Revenue	\$1 Million or Less	74	92.5	71.3	8,353	87.2	81.1	98.5
		Over \$1 Million	5	6.3	28.7	1,182	12.3	18.9	1.5
		Unknown	1	1.3		48	0.5		0.0
		<b>Total</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>9,583</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	49	61.3	71.0	1,763	18.4	24.2	
		\$100,001 - \$250,000	18	22.5	19.4	3,210	33.5	37.2	
		\$250,001 - \$500,000	13	16.3	9.6	4,610	48.1	38.6	
		<b>Total</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>9,583</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	46	62.2		1,633	19.5		
		\$100,001 - \$250,000	18	24.3		3,210	38.4		
		\$250,001 - \$500,000	10	13.5		3,510	42.0		
		<b>Total</b>	<b>74</b>	<b>100.0</b>		<b>8,353</b>	<b>100.0</b>		
Originations & Purchases									
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

Qualified Community Development Loans by Purpose September 26, 2017 through September 20, 2021											
IL Non-MSA	Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services		Total		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$
	0	0	2	890	0	0	6	8,841	8	9,731	15.0

### INVESTMENT TEST

The bank's investment performance in the assessment area is below the overall performance in the state of Illinois. During the review period, the bank made no qualified investments within the assessment area.

Qualified Community Development Donations by Purpose September 26, 2017 - September 20, 2021											
IL Non-MSA	Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services		Total		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$
	0	0	0	0	0	0	11	12,850	11	12,850	3.1

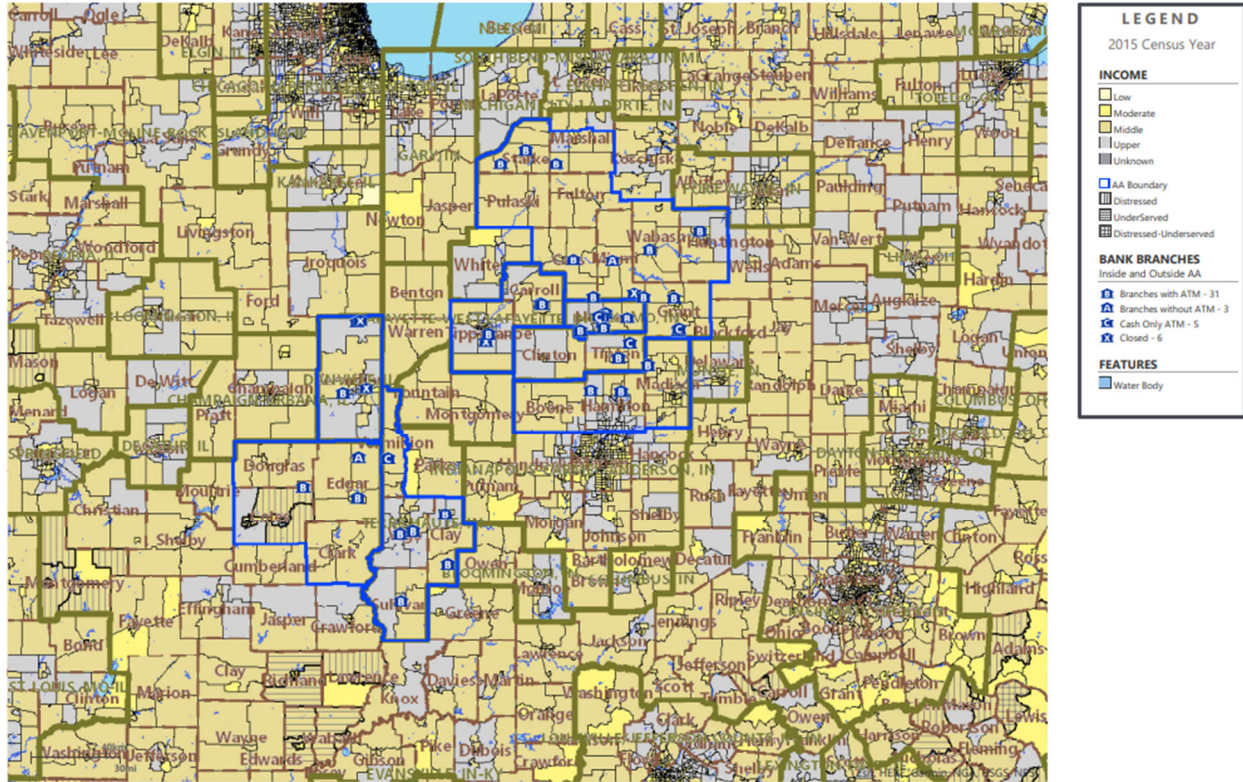
### SERVICE TEST

The institution's service performance in the area is consistent with the service performance overall.

Qualified Community Development Services by Purpose September 26, 2017 - September 20, 2021											
IL Non-MSA	Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services		Total		
	#	Hrs	#	Hrs	#	Hrs	#	Hrs	#	Hrs	% of Total Hours
	0	0	1	120	0	0	2	168	3	288	5.4

### APPENDIX A – Maps of Assessment Areas

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





APPENDIX B – ADDITIONAL TABLES AND EXHIBITS

Assessment Area: 2019 IN Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	17,866	19.7
Moderate-income	21	23.1	17,432	19.2	3,490	20.0	17,667	19.5
Middle-income	63	69.2	64,421	71.1	6,081	9.4	20,770	22.9
Upper-income	7	7.7	8,723	9.6	574	6.6	34,273	37.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>91</b>	<b>100.0</b>	<b>90,576</b>	<b>100.0</b>	<b>10,145</b>	<b>11.2</b>	<b>90,576</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	33,963	17,396	17.6	51.2	11,275	33.2	5,292	15.6
Middle-income	105,903	71,665	72.5	67.7	21,205	20.0	13,033	12.3
Upper-income	12,647	9,847	10.0	77.9	1,685	13.3	1,115	8.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>152,513</b>	<b>98,908</b>	<b>100.0</b>	<b>64.9</b>	<b>34,165</b>	<b>22.4</b>	<b>19,440</b>	<b>12.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3,077	25.6	2,731	25.2	310	32.1	36	16.6
Middle-income	7,788	64.7	7,056	65.1	575	59.5	157	72.4
Upper-income	1,166	9.7	1,060	9.8	82	8.5	24	11.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>12,031</b>	<b>100.0</b>	<b>10,847</b>	<b>100.0</b>	<b>967</b>	<b>100.0</b>	<b>217</b>	<b>100.0</b>
	Percentage of Total Businesses:		90.2		8.0		1.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	15	1.0	15	1.0	0	0.0	0	0.0
Middle-income	1,227	83.8	1,205	83.9	21	80.8	1	100.0
Upper-income	222	15.2	217	15.1	5	19.2	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>1,464</b>	<b>100.0</b>	<b>1,437</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
	Percentage of Total Farms:		98.2		1.8		0.1	

2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2019 IN Non MSA							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2019		2019			
		Count Bank		Agg %	Dollar Bank		
		#	%	%	\$ (000s)	%	%
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	12	9.0	16.1	630	3.6	11.3
	Middle	114	85.7	71.4	15,590	89.8	72.5
	Upper	7	5.3	12.5	1,136	6.5	15.7
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>133</b>	<b>100.0</b>	<b>100.0</b>	<b>17,356</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	1	1.0	11.0	67	0.5	7.6
	Middle	90	92.8	73.6	12,572	93.7	72.5
	Upper	6	6.2	15.5	783	5.8	18.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>97</b>	<b>100.0</b>	<b>100.0</b>	<b>13,422</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	14.2	0	0.0	9.7
	Middle	5	100.0	67.9	428	100.0	68.6
	Upper	0	0.0	17.8	0	0.0	21.7
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>428</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	2	33.3	36.7	1,264	40.5	56.8
	Middle	4	66.7	56.7	1,859	59.5	41.1
	Upper	0	0.0	6.7	0	0.0	2.1
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>3,123</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	10.1	0	0.0	6.8
	Middle	0	0.0	70.4	0	0.0	71.5
	Upper	0	0.0	19.5	0	0.0	21.7
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	16.0	0	0.0	11.4
	Middle	0	0.0	66.5	0	0.0	74.2
	Upper	0	0.0	17.5	0	0.0	14.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	26.1	0	0.0	16.7
	Middle	0	0.0	61.4	0	0.0	69.6
	Upper	0	0.0	12.5	0	0.0	13.7
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	15	6.2	14.4	1,961	5.7	11.2
	Middle	213	88.4	71.6	30,449	88.7	72.3
	Upper	13	5.4	14.1	1,919	5.6	16.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>241</b>	<b>100.0</b>	<b>100.0</b>	<b>34,329</b>	<b>100.0</b>
Originations & Purchases							
2016 FFIEC Census Data							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Borrower Distribution of HMDA Reportable Loans							
Assessment Area: 2019 IN Non MSA							
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison 2019					Families by Family Income %
		Count Bank		Agg %	Dollar Bank		
		#	%	%	\$(000s)	\$ %	\$ %
Home Purchase	Low	16	12.0	10.4	955	5.5	6.3
	Moderate	32	24.1	29.3	2,927	16.9	23.2
	Middle	34	25.6	23.1	4,671	26.9	23.8
	Upper	48	36.1	23.8	8,664	49.9	33.9
	Unknown	3	2.3	13.4	139	0.8	12.8
	<b>Total</b>		<b>133</b>	<b>100.0</b>	<b>100.0</b>	<b>17,356</b>	<b>100.0</b>
Refinance	Low	6	6.2	8.1	320	2.4	3.8
	Moderate	15	15.5	17.8	1,303	9.7	11.6
	Middle	17	17.5	22.9	2,038	15.2	19.3
	Upper	55	56.7	36.7	9,146	68.1	46.9
	Unknown	4	4.1	14.5	615	4.6	18.3
	<b>Total</b>		<b>97</b>	<b>100.0</b>	<b>100.0</b>	<b>13,422</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	12.3	0	0.0	9.9
	Moderate	1	20.0	18.9	106	24.8	17.5
	Middle	0	0.0	23.6	0	0.0	24.6
	Upper	4	80.0	41.6	322	75.2	44.5
	Unknown	0	0.0	3.6	0	0.0	3.4
	<b>Total</b>		<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>428</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	0	0.0	0.0	0	0.0	0.0
	Upper	0	0.0	6.7	0	0.0	0.7
	Unknown	6	100.0	93.3	3,123	100.0	99.3
	<b>Total</b>		<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>3,123</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	6.4	0	0.0	3.2
	Moderate	0	0.0	19.8	0	0.0	14.2
	Middle	0	0.0	29.6	0	0.0	25.5
	Upper	0	0.0	43.0	0	0.0	56.6
	Unknown	0	0.0	1.2	0	0.0	0.6
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	8.7	0	0.0	4.7
	Moderate	0	0.0	25.7	0	0.0	20.1
	Middle	0	0.0	29.6	0	0.0	29.1
	Upper	0	0.0	34.5	0	0.0	44.5
	Unknown	0	0.0	1.5	0	0.0	1.5
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Loan Purpose Not Applicable	Low	0	0.0	1.1	0	0.0	1.1
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	0	0.0	0.0	0	0.0	0.0
	Upper	0	0.0	0.6	0	0.0	1.3
	Unknown	0	0.0	98.3	0	0.0	97.5
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
HMDA Totals	Low	22	9.1	9.3	1,275	3.7	5.2
	Moderate	48	19.9	23.9	4,336	12.6	18.0
	Middle	51	21.2	22.9	6,709	19.5	21.4
	Upper	107	44.4	29.2	18,132	52.8	37.7
	Unknown	13	5.4	14.6	3,877	11.3	17.8
	<b>Total</b>		<b>241</b>	<b>100.0</b>	<b>100.0</b>	<b>34,329</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data  
*Note: Percentages may not add to 100.0 percent due to rounding*

Assessment Area: 2019 Kokomo, IN MSA 29020									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	2	10.0	1,791	8.0	602	33.6	4,955	22.2	
Moderate-income	4	20.0	3,434	15.4	849	24.7	3,704	16.6	
Middle-income	9	45.0	10,461	47.0	1,276	12.2	4,704	21.1	
Upper-income	5	25.0	6,595	29.6	231	3.5	8,918	40.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>20</b>	<b>100.0</b>	<b>22,281</b>	<b>100.0</b>	<b>2,958</b>	<b>13.3</b>	<b>22,281</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	3,862	1,497	6.3	38.8	1,748	45.3	617	16.0	
Moderate-income	7,327	3,372	14.2	46.0	2,460	33.6	1,495	20.4	
Middle-income	17,841	11,558	48.7	64.8	4,830	27.1	1,453	8.1	
Upper-income	9,619	7,304	30.8	75.9	1,644	17.1	671	7.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>38,649</b>	<b>23,731</b>	<b>100.0</b>	<b>61.4</b>	<b>10,682</b>	<b>27.6</b>	<b>4,236</b>	<b>11.0</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	326	11.1	300	11.1	25	12.9	1	3.3	
Moderate-income	540	18.5	493	18.2	40	20.6	7	23.3	
Middle-income	1,338	45.7	1,232	45.6	90	46.4	16	53.3	
Upper-income	722	24.7	677	25.1	39	20.1	6	20.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>2,926</b>	<b>100.0</b>	<b>2,702</b>	<b>100.0</b>	<b>194</b>	<b>100.0</b>	<b>30</b>	<b>100.0</b>	
	Percentage of Total Businesses:			92.3		6.6		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	2	1.5	2	1.5	0	0.0	0	0.0	
Moderate-income	2	1.5	2	1.5	0	0.0	0	0.0	
Middle-income	73	54.1	73	54.1	0	0.0	0	0.0	
Upper-income	58	43.0	58	43.0	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>135</b>	<b>100.0</b>	<b>135</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	
	Percentage of Total Farms:			100.0		0.0		0.0	
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2019 Kokomo, IN MSA 29020								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2019						
		Count Bank		Agg %	Dollar Bank			
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	4	6.1	4.0	190	2.5	1.6	6.3
	Moderate	7	10.6	12.5	559	7.3	8.0	14.2
	Middle	31	47.0	50.5	3,287	42.9	47.6	48.7
	Upper	24	36.4	33.0	3,624	47.3	42.9	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>66</b>	<b>100.0</b>	<b>100.0</b>	<b>7,660</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	2.2	0	0.0	1.0	6.3
	Moderate	2	5.4	6.5	210	4.1	3.7	14.2
	Middle	22	59.5	49.6	2,398	47.2	46.4	48.7
	Upper	13	35.1	41.7	2,468	48.6	48.9	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>5,076</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	4.8	0	0.0	4.0	6.3
	Moderate	1	14.3	16.9	35	5.6	12.7	14.2
	Middle	4	57.1	38.6	375	59.7	38.7	48.7
	Upper	2	28.6	39.8	218	34.7	44.6	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>628</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	27.3	0	0.0	11.2	Multi-Family 14.2
	Moderate	0	0.0	36.4	0	0.0	18.7	8.8
	Middle	0	0.0	27.3	0	0.0	69.2	63.6
	Upper	0	0.0	9.1	0	0.0	0.9	13.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	2.9	0	0.0	1.5	6.3
	Moderate	0	0.0	11.4	0	0.0	6.0	14.2
	Middle	0	0.0	51.4	0	0.0	59.8	48.7
	Upper	0	0.0	34.3	0	0.0	32.7	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	2.7	0	0.0	1.4	6.3
	Moderate	0	0.0	15.3	0	0.0	11.7	14.2
	Middle	0	0.0	45.0	0	0.0	42.1	48.7
	Upper	0	0.0	36.9	0	0.0	44.8	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	12.3	0	0.0	8.4	6.3
	Moderate	0	0.0	12.3	0	0.0	8.0	14.2
	Middle	0	0.0	56.2	0	0.0	58.6	48.7
	Upper	0	0.0	19.2	0	0.0	25.0	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	4	3.6	3.7	190	1.4	2.1	6.3
	Moderate	10	9.1	11.3	804	6.0	7.5	14.2
	Middle	57	51.8	49.6	6,060	45.3	48.5	48.7
	Upper	39	35.5	35.4	6,310	47.2	41.9	30.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>110</b>	<b>100.0</b>	<b>100.0</b>	<b>13,364</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data  
*Note: Percentages may not add to 100.0 percent due to rounding*

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2019 Kokomo, IN MSA 29020								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison 2019					Families by Family Income %	
		Count Bank		Agg %	Dollar Bank			Agg %
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	6	9.1	12.6	426	5.6	7.3	22.2
	Moderate	19	28.8	25.3	1,631	21.3	20.2	16.6
	Middle	15	22.7	23.2	1,644	21.5	24.8	21.1
	Upper	19	28.8	23.8	3,560	46.5	33.3	40.0
	Unknown	7	10.6	15.1	399	5.2	14.3	0.0
	<b>Total</b>		<b>66</b>	<b>100.0</b>	<b>100.0</b>	<b>7,660</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	4	10.8	8.9	356	7.0	4.6	22.2
	Moderate	9	24.3	19.3	791	15.6	13.0	16.6
	Middle	7	18.9	22.6	1,003	19.8	20.3	21.1
	Upper	15	40.5	28.8	2,713	53.4	36.7	40.0
	Unknown	2	5.4	20.4	213	4.2	25.3	0.0
	<b>Total</b>		<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>5,076</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	3	42.9	12.0	210	33.4	9.1	22.2
	Moderate	0	0.0	13.3	0	0.0	7.5	16.6
	Middle	2	28.6	31.3	200	31.8	26.6	21.1
	Upper	1	14.3	39.8	158	25.2	49.7	40.0
	Unknown	1	14.3	3.6	60	9.6	7.1	0.0
	<b>Total</b>		<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>628</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	22.2
	Moderate	0	0.0	0.0	0	0.0	0.0	16.6
	Middle	0	0.0	0.0	0	0.0	0.0	21.1
	Upper	0	0.0	0.0	0	0.0	0.0	40.0
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	20.0	0	0.0	7.8	22.2
	Moderate	0	0.0	25.7	0	0.0	23.8	16.6
	Middle	0	0.0	22.9	0	0.0	34.1	21.1
	Upper	0	0.0	28.6	0	0.0	31.8	40.0
	Unknown	0	0.0	2.9	0	0.0	2.6	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	6.3	0	0.0	4.8	22.2
	Moderate	0	0.0	26.6	0	0.0	19.8	16.6
	Middle	0	0.0	31.5	0	0.0	27.2	21.1
	Upper	0	0.0	34.7	0	0.0	46.8	40.0
	Unknown	0	0.0	0.9	0	0.0	1.4	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	22.2
	Moderate	0	0.0	1.4	0	0.0	1.7	16.6
	Middle	0	0.0	0.0	0	0.0	0.0	21.1
	Upper	0	0.0	0.0	0	0.0	0.0	40.0
	Unknown	0	0.0	98.6	0	0.0	98.3	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	13	11.8	10.8	992	7.4	6.0	22.2
	Moderate	28	25.5	22.7	2,422	18.1	16.6	16.6
	Middle	24	21.8	23.3	2,847	21.3	21.8	21.1
	Upper	35	31.8	25.9	6,431	48.1	32.4	40.0
	Unknown	10	9.1	17.4	672	5.0	23.2	0.0
	<b>Total</b>		<b>110</b>	<b>100.0</b>	<b>100.0</b>	<b>13,364</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data  
*Note: Percentages may not add to 100.0 percent due to rounding*

Assessment Area: 2019 Indianapolis-Carmel-Anderson, IN MSA 26900									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	6	7.0	2,588	2.0	867	33.5	17,817	13.7	
Moderate-income	14	16.3	13,915	10.7	2,549	18.3	19,191	14.7	
Middle-income	31	36.0	38,336	29.4	2,424	6.3	23,742	18.2	
Upper-income	34	39.5	75,602	58.0	1,851	2.4	69,691	53.4	
Unknown-income	1	1.2	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>86</b>	<b>100.0</b>	<b>130,441</b>	<b>100.0</b>	<b>7,691</b>	<b>5.9</b>	<b>130,441</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	7,125	2,140	1.6	30.0	3,011	42.3	1,974	27.7	
Moderate-income	26,368	13,189	9.6	50.0	9,454	35.9	3,725	14.1	
Middle-income	58,272	41,823	30.4	71.8	12,036	20.7	4,413	7.6	
Upper-income	105,394	80,462	58.5	76.3	20,327	19.3	4,605	4.4	
Unknown-income	9	0	0.0	0.0	9	100.0	0	0.0	
<b>Total Assessment Area</b>	<b>197,168</b>	<b>137,614</b>	<b>100.0</b>	<b>69.8</b>	<b>44,837</b>	<b>22.7</b>	<b>14,717</b>	<b>7.5</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%
Low-income	632	2.5	562	2.4	66	3.5	4	1.5	
Moderate-income	2,424	9.6	2,209	9.5	191	10.2	24	9.1	
Middle-income	5,270	20.8	4,829	20.8	358	19.2	83	31.4	
Upper-income	16,957	67.0	15,560	67.2	1,245	66.8	152	57.6	
Unknown-income	10	0.0	5	0.0	4	0.2	1	0.4	
<b>Total Assessment Area</b>	<b>25,293</b>	<b>100.0</b>	<b>23,165</b>	<b>100.0</b>	<b>1,864</b>	<b>100.0</b>	<b>264</b>	<b>100.0</b>	
	Percentage of Total Businesses:			<b>91.6</b>		<b>7.4</b>		<b>1.0</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	14	2.3	14	2.4	0	0.0	0	0.0	
Middle-income	413	68.5	407	68.4	6	75.0	0	0.0	
Upper-income	176	29.2	174	29.2	2	25.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>603</b>	<b>100.0</b>	<b>595</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	
	Percentage of Total Farms:			<b>98.7</b>		<b>1.3</b>		<b>0.0</b>	
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2019 Indianapolis-Carmel-Anderson, IN MSA 26900							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2019		2019			
		Count Bank	Agg	Dollar Bank	Agg		
		#	%	%	\$ (000s)	%	%
Home Purchase	Low	0	0.0	0.4	0	0.0	0.1
	Moderate	4	16.7	6.2	313	8.4	2.7
	Middle	15	62.5	24.4	2,187	58.9	18.7
	Upper	5	20.8	69.0	1,212	32.7	78.6
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>3,712</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.2	0	0.0	0.0
	Moderate	1	5.0	3.4	55	1.3	1.5
	Middle	10	50.0	22.3	1,947	45.2	17.3
	Upper	9	45.0	74.1	2,303	53.5	81.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>4,305</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.2	0	0.0	0.1
	Moderate	0	0.0	4.6	0	0.0	2.2
	Middle	0	0.0	24.8	0	0.0	20.4
	Upper	0	0.0	70.4	0	0.0	77.4
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Multi-Family	Low	0	0.0	3.7	0	0.0	0.5
	Moderate	0	0.0	18.5	0	0.0	12.4
	Middle	0	0.0	44.4	0	0.0	18.6
	Upper	0	0.0	33.3	0	0.0	68.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose LOC	Low	0	0.0	0.4	0	0.0	0.1
	Moderate	0	0.0	5.5	0	0.0	2.9
	Middle	0	0.0	29.8	0	0.0	24.5
	Upper	0	0.0	64.3	0	0.0	72.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.8	0	0.0	0.2
	Moderate	0	0.0	5.3	0	0.0	2.6
	Middle	0	0.0	29.9	0	0.0	20.9
	Upper	0	0.0	64.0	0	0.0	76.4
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Loan Purpose Not Applicable	Low	0	0.0	2.1	0	0.0	0.8
	Moderate	0	0.0	15.6	0	0.0	6.9
	Middle	0	0.0	44.0	0	0.0	33.4
	Upper	0	0.0	38.3	0	0.0	58.9
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
HMDA Totals	Low	0	0.0	0.3	0	0.0	0.1
	Moderate	5	11.4	5.1	368	4.6	2.4
	Middle	25	56.8	24.2	4,134	51.6	18.4
	Upper	14	31.8	70.4	3,515	43.8	79.1
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>8,017</b>	<b>100.0</b>

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding



<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2019 Indianapolis-Carmel-Anderson, IN MSA 26900</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income %	
		2019		2019				
		Count Bank		Agg	Dollar Bank			Agg
		#	%	%	\$(000s)	\$ %	%	
Home Purchase	Low	5	20.8	6.2	329	8.9	2.6	13.7
	Moderate	4	16.7	16.1	323	8.7	10.1	14.7
	Middle	7	29.2	19.8	1,212	32.7	16.6	18.2
	Upper	8	33.3	45.2	1,848	49.8	58.6	53.4
	Unknown	0	0.0	12.7	0	0.0	12.1	0.0
	<b>Total</b>		<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>3,712</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	1	5.0	5.0	97	2.3	2.3	13.7
	Moderate	5	25.0	12.0	791	18.4	7.0	14.7
	Middle	5	25.0	18.1	1,074	24.9	14.2	18.2
	Upper	9	45.0	49.9	2,343	54.4	61.1	53.4
	Unknown	0	0.0	15.1	0	0.0	15.5	0.0
	<b>Total</b>		<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>4,305</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	5.1	0	0.0	3.2	13.7
	Moderate	0	0.0	13.9	0	0.0	9.7	14.7
	Middle	0	0.0	19.4	0	0.0	15.6	18.2
	Upper	0	0.0	59.8	0	0.0	70.1	53.4
	Unknown	0	0.0	1.8	0	0.0	1.3	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	13.7
	Moderate	0	0.0	0.0	0	0.0	0.0	14.7
	Middle	0	0.0	0.0	0	0.0	0.0	18.2
	Upper	0	0.0	0.0	0	0.0	0.0	53.4
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	6.6	0	0.0	3.4	13.7
	Moderate	0	0.0	15.4	0	0.0	9.9	14.7
	Middle	0	0.0	18.4	0	0.0	13.1	18.2
	Upper	0	0.0	56.7	0	0.0	70.5	53.4
	Unknown	0	0.0	3.0	0	0.0	3.1	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	6.7	0	0.0	3.3	13.7
	Moderate	0	0.0	15.5	0	0.0	10.3	14.7
	Middle	0	0.0	22.4	0	0.0	16.9	18.2
	Upper	0	0.0	50.9	0	0.0	63.3	53.4
	Unknown	0	0.0	4.5	0	0.0	6.2	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	13.7
	Moderate	0	0.0	0.3	0	0.0	0.4	14.7
	Middle	0	0.0	0.3	0	0.0	0.5	18.2
	Upper	0	0.0	2.7	0	0.0	7.0	53.4
	Unknown	0	0.0	96.8	0	0.0	92.1	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	6	13.6	5.6	426	5.3	2.4	13.7
	Moderate	9	20.5	14.1	1,114	13.9	8.6	14.7
	Middle	12	27.3	18.8	2,286	28.5	15.1	18.2
	Upper	17	38.6	47.9	4,191	52.3	58.4	53.4
	Unknown	0	0.0	13.5	0	0.0	15.5	0.0
	<b>Total</b>		<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>8,017</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Assessment Area: 2019 Terre Haute, IN MSA 45460								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	9.1	1,833	4.4	734	40.0	8,674	20.8
Moderate-income	9	20.5	6,812	16.3	1,703	25.0	7,336	17.6
Middle-income	20	45.5	19,180	45.9	2,140	11.2	8,479	20.3
Upper-income	11	25.0	13,931	33.4	773	5.5	17,267	41.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>44</b>	<b>100.0</b>	<b>41,756</b>	<b>100.0</b>	<b>5,350</b>	<b>12.8</b>	<b>41,756</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	3,718	1,163	2.7	31.3	1,969	53.0	586	15.8
Moderate-income	14,100	5,595	13.1	39.7	6,447	45.7	2,058	14.6
Middle-income	34,225	21,094	49.2	61.6	8,621	25.2	4,510	13.2
Upper-income	22,343	14,998	35.0	67.1	4,950	22.2	2,395	10.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>74,386</b>	<b>42,850</b>	<b>100.0</b>	<b>57.6</b>	<b>21,987</b>	<b>29.6</b>	<b>9,549</b>	<b>12.8</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	340	6.4	292	6.2	48	9.9	0	0.0
Moderate-income	1,095	20.6	950	20.1	125	25.7	20	20.0
Middle-income	2,215	41.7	1,964	41.5	202	41.5	49	49.0
Upper-income	1,664	31.3	1,521	32.2	112	23.0	31	31.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>5,314</b>	<b>100.0</b>	<b>4,727</b>	<b>100.0</b>	<b>487</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>
		Percentage of Total Businesses:		89.0		9.2		1.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	1	0.3	1	0.3	0	0.0	0	0.0
Moderate-income	4	1.1	4	1.2	0	0.0	0	0.0
Middle-income	191	54.9	189	54.6	2	100.0	0	0.0
Upper-income	152	43.7	152	43.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>348</b>	<b>100.0</b>	<b>346</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
		Percentage of Total Farms:		99.4		0.6		0.0

2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2019 Terre Haute, IN MSA 45460							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2019		2019			
		Count Bank	Agg	Dollar Bank	Agg		
		#	%	%	\$ (000s)	%	%
Home Purchase	Low	0	0.0	1.3	0	0.0	2.7
	Moderate	4	12.5	13.1	543	13.6	13.1
	Middle	14	43.8	48.9	1,284	32.3	49.2
	Upper	14	43.8	36.7	2,153	54.1	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>3,980</b>	<b>100.0</b>
Refinance	Low	0	0.0	1.0	0	0.0	2.7
	Moderate	3	15.8	9.2	214	8.2	13.1
	Middle	8	42.1	47.1	988	38.0	49.2
	Upper	8	42.1	42.8	1,397	53.8	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>2,599</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	3.5	0	0.0	2.7
	Moderate	0	0.0	12.4	0	0.0	13.1
	Middle	1	100.0	50.9	45	100.0	49.2
	Upper	0	0.0	33.2	0	0.0	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>45</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	5.0	0	0.0	<b>Multi-Family</b> 8.8
	Moderate	0	0.0	35.0	0	0.0	7.0
	Middle	0	0.0	50.0	0	0.0	10.5
	Upper	0	0.0	10.0	0	0.0	31.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose LOC	Low	0	0.0	1.3	0	0.0	2.7
	Moderate	0	0.0	5.1	0	0.0	13.1
	Middle	0	0.0	39.7	0	0.0	49.2
	Upper	0	0.0	53.8	0	0.0	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	1.5	0	0.0	2.7
	Moderate	0	0.0	9.1	0	0.0	13.1
	Middle	0	0.0	44.7	0	0.0	49.2
	Upper	0	0.0	44.7	0	0.0	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Loan Purpose Not Applicable	Low	0	0.0	5.3	0	0.0	2.7
	Moderate	0	0.0	23.7	0	0.0	13.1
	Middle	0	0.0	44.7	0	0.0	49.2
	Upper	0	0.0	26.3	0	0.0	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
HMDA Totals	Low	0	0.0	1.4	0	0.0	2.7
	Moderate	7	13.5	11.9	757	11.4	13.1
	Middle	23	44.2	48.1	2,317	35.0	49.2
	Upper	22	42.3	38.5	3,550	53.6	35.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>52</b>	<b>100.0</b>	<b>100.0</b>	<b>6,624</b>	<b>100.0</b>
Originations & Purchases							
2016 FFIEC Census Data							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2019 Terre Haute, IN MSA 45460</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income	
		2019						
		Count Bank		Agg	Dollar Bank			Agg
		#	%	%	\$(000s)	\$ %	\$ %	%
Home Purchase	Low	2	6.3	7.0	72	1.8	3.8	20.8
	Moderate	6	18.8	20.9	674	16.9	14.5	17.6
	Middle	17	53.1	25.0	2,139	53.7	23.7	20.3
	Upper	7	21.9	32.2	1,095	27.5	45.2	41.4
	Unknown	0	0.0	14.9	0	0.0	12.9	0.0
	<b>Total</b>		<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>3,980</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	2	10.5	7.4	135	5.2	3.5	20.8
	Moderate	4	21.1	16.5	200	7.7	9.8	17.6
	Middle	2	10.5	21.6	260	10.0	16.7	20.3
	Upper	11	57.9	38.1	2,004	77.1	49.3	41.4
	Unknown	0	0.0	16.3	0	0.0	20.8	0.0
	<b>Total</b>		<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>2,599</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	14.2	0	0.0	7.3	20.8
	Moderate	0	0.0	19.5	0	0.0	14.1	17.6
	Middle	1	100.0	20.4	45	100.0	17.4	20.3
	Upper	0	0.0	43.4	0	0.0	40.9	41.4
	Unknown	0	0.0	2.7	0	0.0	20.3	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.8
	Moderate	0	0.0	0.0	0	0.0	0.0	17.6
	Middle	0	0.0	0.0	0	0.0	0.0	20.3
	Upper	0	0.0	15.0	0	0.0	1.7	41.4
	Unknown	0	0.0	85.0	0	0.0	98.3	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	5.1	0	0.0	1.3	20.8
	Moderate	0	0.0	17.9	0	0.0	9.1	17.6
	Middle	0	0.0	23.1	0	0.0	12.3	20.3
	Upper	0	0.0	52.6	0	0.0	76.2	41.4
	Unknown	0	0.0	1.3	0	0.0	1.1	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	9.8	0	0.0	5.7	20.8
	Moderate	0	0.0	18.2	0	0.0	16.1	17.6
	Middle	0	0.0	27.3	0	0.0	25.9	20.3
	Upper	0	0.0	40.9	0	0.0	44.1	41.4
	Unknown	0	0.0	3.8	0	0.0	8.2	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	20.8
	Moderate	0	0.0	0.0	0	0.0	0.0	17.6
	Middle	0	0.0	0.0	0	0.0	0.0	20.3
	Upper	0	0.0	0.0	0	0.0	0.0	41.4
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	4	7.7	7.4	207	3.1	3.6	20.8
	Moderate	10	19.2	18.9	874	13.2	12.4	17.6
	Middle	20	38.5	23.2	2,444	36.9	20.2	20.3
	Upper	18	34.6	34.6	3,099	46.8	44.6	41.4
	Unknown	0	0.0	16.0	0	0.0	19.3	0.0
	<b>Total</b>		<b>52</b>	<b>100.0</b>	<b>100.0</b>	<b>6,624</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Assessment Area: 2019 Lafayette-West Lafayette, IN MSA 29200									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	3	6.8	1,168	2.7	506	43.3	8,835	20.5	
Moderate-income	10	22.7	8,247	19.1	1,494	18.1	6,985	16.2	
Middle-income	16	36.4	17,419	40.3	1,825	10.5	9,919	23.0	
Upper-income	12	27.3	16,237	37.6	838	5.2	17,441	40.4	
Unknown-income	3	6.8	109	0.3	22	20.2	0	0.0	
<b>Total Assessment Area</b>	<b>44</b>	<b>100.0</b>	<b>43,180</b>	<b>100.0</b>	<b>4,685</b>	<b>10.8</b>	<b>43,180</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	5,131	410	1.0	8.0	4,068	79.3	653	12.7	
Moderate-income	17,789	6,662	15.8	37.5	9,534	53.6	1,593	9.0	
Middle-income	30,780	17,130	40.7	55.7	10,834	35.2	2,816	9.1	
Upper-income	26,506	17,796	42.3	67.1	7,082	26.7	1,628	6.1	
Unknown-income	2,386	43	0.1	1.8	1,990	83.4	353	14.8	
<b>Total Assessment Area</b>	<b>82,592</b>	<b>42,041</b>	<b>100.0</b>	<b>50.9</b>	<b>33,508</b>	<b>40.6</b>	<b>7,043</b>	<b>8.5</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low-income	256	3.9	227	3.7	28	5.8	1	1.7	
Moderate-income	1,891	28.6	1,670	27.6	210	43.6	11	18.6	
Middle-income	2,140	32.4	1,978	32.6	136	28.2	26	44.1	
Upper-income	2,098	31.8	1,982	32.7	96	19.9	20	33.9	
Unknown-income	217	3.3	204	3.4	12	2.5	1	1.7	
<b>Total Assessment Area</b>	<b>6,602</b>	<b>100.0</b>	<b>6,061</b>	<b>100.0</b>	<b>482</b>	<b>100.0</b>	<b>59</b>	<b>100.0</b>	
	Percentage of Total Businesses:			91.8		7.3		0.9	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	10	2.4	9	2.2	1	11.1	0	0.0	
Middle-income	255	61.0	248	60.6	7	77.8	0	0.0	
Upper-income	153	36.6	152	37.2	1	11.1	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>418</b>	<b>100.0</b>	<b>409</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	
	Percentage of Total Farms:			97.8		2.2		0.0	
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
Note: Percentages may not add to 100.0 percent due to rounding									

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2019 Lafayette-West Lafayette, IN MSA 29200							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2019		2019			
		Count Bank		Agg %	Dollar Bank		
		#	%	%	\$ (000s)	%	%
Home Purchase	Low	0	0.0	1.1	0	0.0	0.7
	Moderate	1	11.1	15.3	64	4.4	10.3
	Middle	7	77.8	37.3	1,105	75.9	34.2
	Upper	1	11.1	46.1	287	19.7	54.6
	Unknown	0	0.0	0.1	0	0.0	0.2
	<b>Total</b>		<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,456</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.6	0	0.0	0.3
	Moderate	0	0.0	13.7	0	0.0	8.5
	Middle	6	100.0	35.1	998	100.0	32.9
	Upper	0	0.0	50.6	0	0.0	58.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>998</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.9	0	0.0	0.7
	Moderate	0	0.0	15.4	0	0.0	12.4
	Middle	0	0.0	33.8	0	0.0	28.0
	Upper	0	0.0	49.7	0	0.0	57.0
	Unknown	0	0.0	0.2	0	0.0	1.9
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Multi-Family	Low	0	0.0	5.4	0	0.0	2.7
	Moderate	0	0.0	28.6	0	0.0	29.4
	Middle	1	100.0	35.7	100	100.0	34.7
	Upper	0	0.0	16.1	0	0.0	8.8
	Unknown	0	0.0	14.3	0	0.0	24.4
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.4	0	0.0	0.6
	Moderate	0	0.0	10.5	0	0.0	7.3
	Middle	0	0.0	37.9	0	0.0	33.6
	Upper	0	0.0	51.2	0	0.0	58.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.6	0	0.0	0.3
	Moderate	0	0.0	14.1	0	0.0	9.5
	Middle	0	0.0	42.9	0	0.0	39.8
	Upper	0	0.0	42.4	0	0.0	50.4
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Loan Purpose Not Applicable	Low	0	0.0	1.9	0	0.0	1.6
	Moderate	0	0.0	30.2	0	0.0	21.8
	Middle	0	0.0	34.0	0	0.0	36.3
	Upper	0	0.0	34.0	0	0.0	40.3
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
HMDA Totals	Low	0	0.0	1.0	0	0.0	0.9
	Moderate	1	6.3	14.8	64	2.5	12.5
	Middle	14	87.5	36.6	2,203	86.3	33.9
	Upper	1	6.3	47.4	287	11.2	49.3
	Unknown	0	0.0	0.2	0	0.0	3.5
	<b>Total</b>		<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>2,554</b>	<b>100.0</b>
Originations & Purchases							
2016 FFIEC Census Data							
Note: Percentages may not add to 100.0 percent due to rounding							

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2019 Lafayette-West Lafayette, IN MSA 29200</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison 2019					Families by Family Income %	
		Count Bank		Agg	Dollar Bank			Agg
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	1	11.1	8.5	64	4.4	5.0	20.5
	Moderate	1	11.1	25.4	180	12.4	19.4	16.2
	Middle	5	55.6	21.9	1,040	71.4	21.4	23.0
	Upper	2	22.2	33.4	172	11.8	44.0	40.4
	Unknown	0	0.0	10.9	0	0.0	10.2	0.0
	<b>Total</b>		<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,456</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	8.1	0	0.0	4.4	20.5
	Moderate	1	16.7	18.5	175	17.5	13.2	16.2
	Middle	3	50.0	22.9	380	38.1	19.1	23.0
	Upper	2	33.3	34.8	443	44.4	45.5	40.4
	Unknown	0	0.0	15.7	0	0.0	17.8	0.0
	<b>Total</b>		<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>998</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	6.8	0	0.0	5.8	20.5
	Moderate	0	0.0	19.1	0	0.0	12.5	16.2
	Middle	0	0.0	21.7	0	0.0	18.2	23.0
	Upper	0	0.0	49.0	0	0.0	58.9	40.4
	Unknown	0	0.0	3.5	0	0.0	4.7	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.5
	Moderate	0	0.0	0.0	0	0.0	0.0	16.2
	Middle	0	0.0	0.0	0	0.0	0.0	23.0
	Upper	0	0.0	16.1	0	0.0	2.2	40.4
	Unknown	1	100.0	83.9	100	100.0	97.8	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	6.9	0	0.0	3.6	20.5
	Moderate	0	0.0	17.5	0	0.0	16.1	16.2
	Middle	0	0.0	23.2	0	0.0	20.1	23.0
	Upper	0	0.0	47.8	0	0.0	55.6	40.4
	Unknown	0	0.0	4.6	0	0.0	4.6	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	9.0	0	0.0	5.8	20.5
	Moderate	0	0.0	13.6	0	0.0	8.7	16.2
	Middle	0	0.0	22.0	0	0.0	15.7	23.0
	Upper	0	0.0	50.3	0	0.0	64.6	40.4
	Unknown	0	0.0	5.1	0	0.0	5.2	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.9	0	0.0	0.2	20.5
	Moderate	0	0.0	0.0	0	0.0	0.0	16.2
	Middle	0	0.0	0.0	0	0.0	0.0	23.0
	Upper	0	0.0	0.0	0	0.0	0.0	40.4
	Unknown	0	0.0	99.1	0	0.0	99.8	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	1	6.3	8.0	64	2.5	4.1	20.5
	Moderate	2	12.5	21.6	355	13.9	14.6	16.2
	Middle	8	50.0	21.8	1,420	55.6	17.5	23.0
	Upper	4	25.0	35.5	615	24.1	39.2	40.4
	Unknown	1	6.3	13.2	100	3.9	24.6	0.0
	<b>Total</b>		<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>2,554</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Assessment Area: 2019 Danville, IL MSA 19180									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	1	4.2	851	4.2	376	44.2	4,388	21.7	
Moderate-income	5	20.8	3,018	14.9	892	29.6	3,388	16.8	
Middle-income	10	41.7	9,603	47.6	1,162	12.1	4,181	20.7	
Upper-income	8	33.3	6,716	33.3	437	6.5	8,231	40.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>24</b>	<b>100.0</b>	<b>20,188</b>	<b>100.0</b>	<b>2,867</b>	<b>14.2</b>	<b>20,188</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	1,482	611	2.8	41.2	688	46.4	183	12.3	
Moderate-income	6,185	2,470	11.4	39.9	2,411	39.0	1,304	21.1	
Middle-income	17,179	10,798	49.6	62.9	4,554	26.5	1,827	10.6	
Upper-income	11,247	7,872	36.2	70.0	2,127	18.9	1,248	11.1	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>36,093</b>	<b>21,751</b>	<b>100.0</b>	<b>60.3</b>	<b>9,780</b>	<b>27.1</b>	<b>4,562</b>	<b>12.6</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low-income	64	2.9	43	2.2	20	10.1	1	2.1	
Moderate-income	505	23.2	428	22.2	73	36.7	4	8.3	
Middle-income	971	44.6	877	45.4	70	35.2	24	50.0	
Upper-income	638	29.3	583	30.2	36	18.1	19	39.6	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>2,178</b>	<b>100.0</b>	<b>1,931</b>	<b>100.0</b>	<b>199</b>	<b>100.0</b>	<b>48</b>	<b>100.0</b>	
	Percentage of Total Businesses:			88.7		9.1		2.2	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0	
Middle-income	90	40.5	87	40.3	3	60.0	0	0.0	
Upper-income	132	59.5	129	59.7	2	40.0	1	100.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>222</b>	<b>100.0</b>	<b>216</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	
	Percentage of Total Farms:			97.3		2.3		0.5	
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									



Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2019 Danville, IL MSA 19180								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2019						
		Count Bank		Agg	Dollar Bank			Agg
#	%	%	\$ (000s)	%	%			
Home Purchase	Low	0	0.0	0.8	0	0.0	0.5	2.8
	Moderate	0	0.0	3.4	0	0.0	2.4	11.4
	Middle	6	54.5	48.5	573	62.3	44.8	49.6
	Upper	5	45.5	47.3	347	37.7	52.3	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>920</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	1.0	0	0.0	0.5	2.8
	Moderate	0	0.0	3.0	0	0.0	1.5	11.4
	Middle	3	100.0	49.1	209	100.0	45.8	49.6
	Upper	0	0.0	46.9	0	0.0	52.2	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>209</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	2.8
	Moderate	0	0.0	5.1	0	0.0	2.8	11.4
	Middle	0	0.0	66.1	0	0.0	69.3	49.6
	Upper	0	0.0	28.8	0	0.0	27.9	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	11.1	0	0.0	3.8	Multi-Family 12.2
	Moderate	0	0.0	22.2	0	0.0	34.3	21.1
	Middle	1	100.0	38.9	200	100.0	23.6	37.8
	Upper	0	0.0	27.8	0	0.0	38.3	29.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	2.8
	Moderate	0	0.0	0.0	0	0.0	0.0	11.4
	Middle	0	0.0	33.3	0	0.0	19.0	49.6
	Upper	0	0.0	66.7	0	0.0	81.0	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	2.8
	Moderate	0	0.0	4.0	0	0.0	7.2	11.4
	Middle	0	0.0	46.0	0	0.0	35.0	49.6
	Upper	0	0.0	50.0	0	0.0	57.8	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	5.6	0	0.0	2.3	2.8
	Moderate	0	0.0	8.3	0	0.0	6.2	11.4
	Middle	0	0.0	52.8	0	0.0	47.2	49.6
	Upper	0	0.0	33.3	0	0.0	44.3	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	1.1	0	0.0	0.7	2.8
	Moderate	0	0.0	3.8	0	0.0	4.5	11.4
	Middle	10	66.7	49.3	982	73.9	43.9	49.6
	Upper	5	33.3	45.8	347	26.1	50.9	36.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>1,329</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2019 Danville, IL MSA 19180								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income	
		2019						
		Count Bank		Agg	Dollar Bank			Agg
		#	%	%	\$(000s)	\$ %	%	
Home Purchase	Low	2	18.2	5.2	78	8.5	2.7	21.7
	Moderate	5	45.5	23.3	272	29.6	16.7	16.8
	Middle	1	9.1	26.4	61	6.6	25.1	20.7
	Upper	3	27.3	28.7	509	55.3	40.4	40.8
	Unknown	0	0.0	16.3	0	0.0	15.1	0.0
	<b>Total</b>		<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>920</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	7.1	0	0.0	4.2	21.7
	Moderate	0	0.0	12.3	0	0.0	8.0	16.8
	Middle	0	0.0	24.2	0	0.0	20.9	20.7
	Upper	2	66.7	41.1	109	52.2	49.1	40.8
	Unknown	1	33.3	15.4	100	47.8	17.7	0.0
	<b>Total</b>		<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>209</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	10.2	0	0.0	7.7	21.7
	Moderate	0	0.0	16.9	0	0.0	16.8	16.8
	Middle	0	0.0	27.1	0	0.0	22.0	20.7
	Upper	0	0.0	42.4	0	0.0	51.7	40.8
	Unknown	0	0.0	3.4	0	0.0	1.8	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	21.7
	Moderate	0	0.0	0.0	0	0.0	0.0	16.8
	Middle	0	0.0	0.0	0	0.0	0.0	20.7
	Upper	0	0.0	5.6	0	0.0	3.4	40.8
	Unknown	1	100.0	94.4	200	100.0	96.6	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	11.1	0	0.0	12.0	21.7
	Moderate	0	0.0	11.1	0	0.0	4.3	16.8
	Middle	0	0.0	11.1	0	0.0	2.7	20.7
	Upper	0	0.0	44.4	0	0.0	59.3	40.8
	Unknown	0	0.0	22.2	0	0.0	21.7	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	6.0	0	0.0	5.5	21.7
	Moderate	0	0.0	22.0	0	0.0	22.2	16.8
	Middle	0	0.0	16.0	0	0.0	16.3	20.7
	Upper	0	0.0	54.0	0	0.0	54.4	40.8
	Unknown	0	0.0	2.0	0	0.0	1.6	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	21.7
	Moderate	0	0.0	2.8	0	0.0	2.2	16.8
	Middle	0	0.0	0.0	0	0.0	0.0	20.7
	Upper	0	0.0	2.8	0	0.0	9.6	40.8
	Unknown	0	0.0	94.4	0	0.0	88.2	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	2	13.3	5.9	78	5.9	3.1	21.7
	Moderate	5	33.3	18.2	272	20.5	12.5	16.8
	Middle	1	6.7	23.9	61	4.6	21.2	20.7
	Upper	5	33.3	33.6	618	46.5	40.7	40.8
	Unknown	2	13.3	18.4	300	22.6	22.5	0.0
	<b>Total</b>		<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>1,329</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Assessment Area: 2019 IL Non MSA									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	6,198	22.5	
Moderate-income	4	15.4	5,017	18.2	893	17.8	4,964	18.0	
Middle-income	19	73.1	19,303	70.0	2,156	11.2	5,878	21.3	
Upper-income	2	7.7	3,041	11.0	186	6.1	10,525	38.2	
Unknown-income	1	3.8	204	0.7	76	37.3	0	0.0	
<b>Total Assessment Area</b>	<b>26</b>	<b>100.0</b>	<b>27,565</b>	<b>100.0</b>	<b>3,311</b>	<b>12.0</b>	<b>27,565</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate-income	9,411	4,804	16.3	51.0	3,368	35.8	1,239	13.2	
Middle-income	33,098	21,034	71.4	63.6	8,515	25.7	3,549	10.7	
Upper-income	4,746	3,502	11.9	73.8	958	20.2	286	6.0	
Unknown-income	1,098	126	0.4	11.5	737	67.1	235	21.4	
<b>Total Assessment Area</b>	<b>48,353</b>	<b>29,466</b>	<b>100.0</b>	<b>60.9</b>	<b>13,578</b>	<b>28.1</b>	<b>5,309</b>	<b>11.0</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low-income	0	0	0.0	0	0.0	0	0.0		
Moderate-income	907	23.4	806	23.3	92	27.7	9	11.0	
Middle-income	2,604	67.2	2,320	67.0	214	64.5	70	85.4	
Upper-income	327	8.4	301	8.7	23	6.9	3	3.7	
Unknown-income	39	1.0	36	1.0	3	0.9	0	0.0	
<b>Total Assessment Area</b>	<b>3,877</b>	<b>100.0</b>	<b>3,463</b>	<b>100.0</b>	<b>332</b>	<b>100.0</b>	<b>82</b>	<b>100.0</b>	
	Percentage of Total Businesses:			<b>89.3</b>		<b>8.6</b>		<b>2.1</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low-income	0	0	0.0	0	0.0	0	0.0		
Moderate-income	29	5.6	28	5.5	1	12.5	0	0.0	
Middle-income	439	84.3	432	84.2	7	87.5	0	0.0	
Upper-income	53	10.2	53	10.3	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>521</b>	<b>100.0</b>	<b>513</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	
	Percentage of Total Farms:			<b>98.5</b>		<b>1.5</b>		<b>0.0</b>	
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2019 IL Non MSA							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2019		2019			
		Count Bank		Agg %	Dollar Bank		
		#	%	%	\$ (000s)	%	%
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	7	43.8	17.7	803	55.9	13.6
	Middle	9	56.3	70.0	634	44.1	69.3
	Upper	0	0.0	11.0	0	0.0	11.9
	Unknown	0	0.0	1.3	0	0.0	0.4
	<b>Total</b>		<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>1,437</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	7	70.0	18.5	548	52.1	14.9
	Middle	3	30.0	72.3	503	47.9	73.3
	Upper	0	0.0	9.0	0	0.0	11.9
	Unknown	0	0.0	0.2	0	0.0	0.4
	<b>Total</b>		<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>1,051</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	18.8	0	0.0	16.3
	Middle	0	0.0	68.8	0	0.0	71.4
	Upper	0	0.0	12.5	0	0.0	11.9
	Unknown	0	0.0	0.0	0	0.0	0.4
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	28.6	0	0.0	27.2
	Middle	0	0.0	57.1	0	0.0	50.9
	Upper	0	0.0	0.0	0	0.0	7.3
	Unknown	0	0.0	14.3	0	0.0	14.6
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	16.3
	Middle	0	0.0	100.0	0	0.0	71.4
	Upper	0	0.0	0.0	0	0.0	11.9
	Unknown	0	0.0	0.0	0	0.0	0.4
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	4.5	0	0.0	16.3
	Middle	0	0.0	81.8	0	0.0	71.4
	Upper	0	0.0	13.6	0	0.0	11.9
	Unknown	0	0.0	0.0	0	0.0	0.4
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	25.0	0	0.0	16.3
	Middle	0	0.0	75.0	0	0.0	71.4
	Upper	0	0.0	0.0	0	0.0	11.9
	Unknown	0	0.0	0.0	0	0.0	0.4
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	14	53.8	17.9	1,351	54.3	16.3
	Middle	12	46.2	71.1	1,137	45.7	71.4
	Upper	0	0.0	10.1	0	0.0	11.9
	Unknown	0	0.0	0.9	0	0.0	0.4
	<b>Total</b>		<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>2,488</b>	<b>100.0</b>
Originations & Purchases							
2016 FFIEC Census Data							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2019 IL Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income %	
		2019						
		Count Bank		Dollar Bank				
		#	%	Agg %	\$(000s)	\$ %	Agg %	
Home Purchase	Low	2	12.5	11.1	146	10.2	6.9	22.5
	Moderate	5	31.3	22.0	316	22.0	17.0	18.0
	Middle	4	25.0	24.9	274	19.1	24.9	21.3
	Upper	3	18.8	28.4	539	37.5	38.9	38.2
	Unknown	2	12.5	13.5	162	11.3	12.3	0.0
	<b>Total</b>		<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>1,437</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	2	20.0	9.4	265	25.2	5.6	22.5
	Moderate	4	40.0	15.5	202	19.2	10.3	18.0
	Middle	0	0.0	25.4	0	0.0	23.1	21.3
	Upper	4	40.0	40.3	584	55.6	50.2	38.2
	Unknown	0	0.0	9.5	0	0.0	10.8	0.0
	<b>Total</b>		<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>1,051</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	10.4	0	0.0	9.1	22.5
	Moderate	0	0.0	16.7	0	0.0	17.2	18.0
	Middle	0	0.0	22.9	0	0.0	22.1	21.3
	Upper	0	0.0	47.9	0	0.0	48.2	38.2
	Unknown	0	0.0	2.1	0	0.0	3.5	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	22.5
	Moderate	0	0.0	0.0	0	0.0	0.0	18.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.3
	Upper	0	0.0	14.3	0	0.0	1.4	38.2
	Unknown	0	0.0	85.7	0	0.0	98.6	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	22.5
	Moderate	0	0.0	40.0	0	0.0	10.4	18.0
	Middle	0	0.0	20.0	0	0.0	51.8	21.3
	Upper	0	0.0	40.0	0	0.0	37.8	38.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	13.6	0	0.0	9.2	22.5
	Moderate	0	0.0	18.2	0	0.0	14.9	18.0
	Middle	0	0.0	36.4	0	0.0	31.2	21.3
	Upper	0	0.0	27.3	0	0.0	28.7	38.2
	Unknown	0	0.0	4.5	0	0.0	16.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	22.5
	Moderate	0	0.0	0.0	0	0.0	0.0	18.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.3
	Upper	0	0.0	0.0	0	0.0	0.0	38.2
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	4	15.4	10.3	411	16.5	5.8	22.5
	Moderate	9	34.6	19.1	518	20.8	13.1	18.0
	Middle	4	15.4	24.7	274	11.0	22.0	21.3
	Upper	7	26.9	32.9	1,123	45.1	39.4	38.2
	Unknown	2	7.7	13.1	162	6.5	19.7	0.0
	<b>Total</b>		<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>2,488</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

**APPENDIX C – SCOPE OF EXAMINATION**

SCOPE OF EXAMINATION			
<b>TIME PERIOD REVIEWED</b>	HMDA-Reportable Lending: January 1, 2019 to December 31, 2020 Small Business and Small Farm: January 1, 2019 to December 31, 2019 Community Development Activity: September 26, 2017 to September 20, 2021		
<b>FINANCIAL INSTITUTION</b>  First Farmers Bank & Trust			<b>PRODUCTS REVIEWED</b>  HMDA-Reportable Loans CRA-Reportable Small Business Loans CRA-Reportable Small Farm Loans
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b>
None	None		None
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Indiana 1. Indiana Non-MSA 2. Kokomo, IN MSA #29020 3. Indianapolis-Carmel-Anderson, IN MSA #26900 4. Lafayette-West Lafayette, IN MSA #29200 5. Terre Haute, IN MSA #45460	Full Scope Review          Limited Scope Review	None	None

<p>Illinois</p> <ol style="list-style-type: none"><li>1. Danville, IL MSA #19180</li><li>2. Illinois Non-MSA</li></ol>	<p>Full Scope Review</p> <p>Limited Scope Review</p>	<p>None</p>	<p>None</p>
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## APPENDIX D – Glossary

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

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

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

**American Community Survey Data (ACS):** The American Community Survey (ACS) data is based on a nationwide survey designed to provide local communities with reliable and timely demographic, social, economic, and housing data each year. The Census Bureau first released data for geographies of all sizes in 2010. This data is known as the “five-year estimate data.” The five-year estimate data is used by the FFIEC as the base file for data used in conjunction with consumer compliance and CRA examinations.<sup>1</sup>

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

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

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

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

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

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<sup>1</sup> Source: FFIEC press release dated October 19, 2011.



228.11(c)(2).

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

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

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

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

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

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

- 1) Low- or moderate-income geographies;
- 2) Designated disaster areas; or
- 3) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation and Office of the Comptroller of the Currency based on:

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

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

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

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

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

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

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

**Fair market rent:** Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th

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

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

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

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

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

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

**Income Level:** Income level means:

- 1) Low-income – an individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a census tract;
- 2) Moderate-income – an individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent in the case of a census tract;
- 3) Middle-income – an individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent in the case of a census tract; and
- 4) Upper-income – an individual income that is at least 120 percent of the area median

income, or a median family income that is at least 120 percent in the case of a census tract.

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

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

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

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

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

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

more bordering states is called a multistate metropolitan statistical area.

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

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

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

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

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

**Small Bank:** This term refers to a bank that as of December 31 of either of the prior two calendar years, had assets of less than \$1.322 billion. Intermediate small bank means a small bank with assets of at least \$330 million as of December 31 of both of the prior two calendar years and less than \$1.322 billion as of December 31 of either of the prior two calendar years.

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

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

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

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