

# **PUBLIC DISCLOSURE**

January 24, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Citizens State Bank of New Castle, Indiana  
Certificate Number: 13107

1238 Broad Street  
New Castle, IN 47362

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Chicago Regional Office

300 South Riverside Plaza, Suite 1700  
Chicago, Illinois 60606

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

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## INSTITUTION RATING

**INSTITUTION'S CRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

**The Lending Test is rated Satisfactory.**

- The loan-to-deposit (LTD) ratio is reasonable given the institution's financial condition, and assessment area (AA) credit needs.
- A majority of the bank's home mortgage, motor vehicle, and small business loans are within the AAs.
- The geographic distribution of loans reflects reasonable dispersion throughout the AAs.
- The distribution of borrowers reflects, given the demographics of the AAs, reasonable penetration of loans among individuals of different income levels and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

**The Community Development Test is rated Satisfactory.**

The institution demonstrates adequate responsiveness to the community development needs of its AAs through community development loans, qualified investments, and community development services, as appropriate. Examiners considered the institution's capacity and the need and availability of such opportunities for community development in the AAs.

## DESCRIPTION OF INSTITUTION

Citizens State Bank of New Castle, Indiana (CSB) operates in the central and east-central portions of Indiana. Town Financial Corporation, a one-bank holding company based in Hartford City, Indiana, owns CSB. The institution received a satisfactory rating at its previous FDIC evaluation dated January 13, 2020, at which time examiners utilized Intermediate Small Institution Examination Procedures.

CSB operates its headquarters, eight full-service branch offices, and two limited-service branches, all within Indiana. The institution's main office is located in Henry County in the community of New Castle, Indiana, approximately 46 miles east of Indianapolis. CSB's 11 offices are located in a region that spans from Carmel, Indiana, at the westernmost point, to Union City, Indiana, near the Ohio state line, at the easternmost point. All of the branch offices have non-deposit taking ATMs.

CSB operates two additional non-deposit taking ATMs in Henry County. The following table provides additional information on the bank’s headquarters and branch locations.

<b>Office Locations</b>				
<b>Address</b>	<b>City</b>	<b>County</b>	<b>ATM</b>	<b>Census Tract Income Level</b>
1238 Broad Street	New Castle	Henry	Y	Middle
475 N McCullum Street	Knightstown	Henry	Y	Middle
1726 S Memorial Drive	New Castle	Henry	Y	Middle
1302 Broad Street*	New Castle	Henry	Y	Middle
1515 N Walnut Street	Hartford City	Blackford	Y	Middle
222 West Washington Street*	Hartford City	Blackford	Y	Moderate
200 W Oak Street	Union City	Randolph	Y	Moderate
1802 N Main Street	Rushville	Rush	Y	Moderate
129 S Pendleton Ave	Pendleton	Madison	Y	Middle
902 S Range Line Road	Carmel	Hamilton	Y	Upper
9 Municipal Drive	Fishers	Hamilton	Y	Upper
<i>Source: Bank Records, 2010 U.S. Census; *Limited-service branch</i>				

CSB offers home mortgage, commercial, consumer, construction/development, and agricultural loans. The institution primarily focuses on home mortgage, commercial, and motor vehicle lending. Additionally, the institution provides a variety of deposit services for individuals and businesses, including checking, savings, and money market accounts, certificates of deposit, Individual Retirement Accounts, and Health Savings Accounts. Alternative banking services include internet and mobile banking, and two freestanding ATMs. The bank closed three branch offices and did not open any branch offices during the evaluation period. The office closures did not adversely affect the provision or availability of services for low- or moderate-income people. CSB did not engage in any merger or acquisition activity during the evaluation period.

During the evaluation period, CSB participated in the Small Business Administration’s Paycheck Protection Program (PPP), which were loans to businesses during the COVID-19 Pandemic to cover wages and other operating expenses. CSB originated approximately 686 PPP loans totaling \$64.6 million in 2020, and approximately 449 loans totaling \$21.9 million in 2021.

Assets totaled \$780.5 million as of September 30, 2022, and included total loans of \$391.6 million and securities totaling \$302.9 million. The following table details the loan portfolio.

<b>Loan Portfolio Distribution as of 09/30/2022</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	24,036	6.1
Secured by Farmland	17,006	4.3
Secured by 1-4 Family Residential Properties	138,380	35.3
Secured by Multifamily (5 or more) Residential Properties	7,681	2.0
Secured by Nonfarm Nonresidential Properties	85,582	21.9
<b>Total Real Estate Loans</b>	<b>272,685</b>	<b>69.6</b>
Commercial and Industrial Loans	45,905	11.7
Agricultural Production and Other Loans to Farmers	7,009	1.8
Consumer Loans	61,867	15.8
Obligations of State and Political Subdivisions in the U.S.	3,882	1.0
Other Loans	175	0
Lease Financing Receivable (net of unearned income)	82	0
Less: Unearned Income	0	0
<b>Total Loans</b>	<b>391,605</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income; Due to rounding, totals may not equal 100.0%</i>		

Examiners did not identify any financial, legal, or other impediments that would limit CSB’s ability to meet AA credit needs.

## **DESCRIPTION OF ASSESSMENT AREAS**

The CRA requires each financial institution to define one or more AAs within which to evaluate its CRA performance. CSB designated two AAs, briefly described below. There have been no changes to either AA since the previous evaluation. This evaluation contains separate sections for each AA that include additional, detailed information.

- Indiana Non-Metropolitan Statistical Area (Non-MSA) AA – Blackford, Henry, and Rush Counties in their entirety, as well as two census tracts in Randolph County and one tract in Wells County.
- Indianapolis-Carmel-Anderson, IN MSA AA – Hamilton and Madison Counties in their entirety.

The Indiana Non-MSA AA includes non-contiguous areas; however, examiners did not identify performance disparities across these areas, and each had similar credit and community development needs. Therefore, this evaluation presents the performance in the non-contiguous areas as a single AA. Hamilton and Madison Counties in the Indianapolis-Carmel-Anderson, IN MSA AA are contiguous counties. The AAs conform to the requirements of the CRA regulation, do not arbitrarily exclude low- and moderate-income geographies, and do not reflect illegal discrimination.

Examiners placed greater emphasis on the bank’s performance in the Non-MSA AA in the overall rating, because it contains the majority of the reviewed lending activity and a significant majority of

the institution's deposits and branch locations. Examiners conducted a full-scope review of the Non-MSA AA and a limited review of the Indianapolis-Carmel-Anderson, IN MSA AA.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from the prior evaluation dated January 13, 2020, to the current evaluation dated January 24, 2023. The Intermediate Small Institution Examination Procedures used to evaluate CSB's performance include two tests: The Small Bank Lending Test (Lending Test) and the Community Development Test. Performance criteria for each test are described in the Appendix. Institutions must achieve a rating of at least "Satisfactory" under each test to obtain an overall "Satisfactory" rating. This evaluation does not include any lending activity performed by affiliates.

### **Activities Reviewed**

Examiners determined that the bank's major product lines are home mortgage, motor vehicle, and small business lending. This conclusion considered the bank's business focus, loan portfolio composition, and the number and dollar amount of loans originated during the evaluation period. No other loan types, such as small farm loans or other consumer loan products, represent a major product line. Other loan types, therefore, provided no material support for conclusions or ratings and are not presented.

Bank records indicate that the lending focus and product mix remained consistent throughout the evaluation period. This evaluation considers all home mortgage loans reported on the bank's 2020 and 2021 Home Mortgage Disclosure Act (HMDA) Loan Application Registers. The bank originated 168 home mortgage loans totaling approximately \$28.4 million in 2020, and 178 home mortgage loans totaling approximately \$34.3 million in 2021. Aggregate HMDA data for 2020 and 2021 provided a standard of comparison for home mortgage loans.

Examiners selected a sample of motor vehicle loans originated in the period from January 1, 2021 through December 31, 2021. The sample is considered representative of CSB's performance during the entire evaluation period. The bank originated 1,206 motor vehicle loans totaling approximately \$27.2 million in 2021, of which examiners sampled 257 totaling approximately \$5.7 million. Examiners used data from the 2015 American Community Survey (ACS) 5-year estimates as of 2020 to evaluate motor vehicle lending.

This evaluation considers all small business loans originated in the period from January 1, 2021 through December 31, 2021. Excluding PPP loans, the bank originated 142 small business loans totaling approximately \$29.4 million. Examiners used 2021 D&B data to evaluate the small business loans.

CSB's primary focus is home mortgage lending. Examiners placed greater emphasis on home mortgage lending in the overall rating, followed by motor vehicle and small business lending.

For the Lending Test, examiners reviewed the number and dollar volume of home mortgage, motor vehicle, and small business loans. While this evaluation presents the number and dollar volume of loans, examiners emphasized performance by number because it is a better indicator of the number of individuals and businesses served.

For the Community Development Test, bank management provided data on community development loans, qualified investments, and community development services since the prior CRA evaluation.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

CSB demonstrated reasonable performance under the Lending Test. Geographic Distribution and Borrower Profile performance primarily support this conclusion.

#### **Loan-to-Deposit Ratio**

The LTD ratio is reasonable considering seasonal variations and taking into account lending-related activities, given the institution’s size, financial condition, and AA credit needs. The bank’s LTD ratio, calculated from Call Report data, averaged 58.2 percent over the past 11 calendar quarters from March 31, 2020, to September 30, 2022. The bank’s ratio declined during the evaluation period overall. It ranged from a high of 70.0 percent as of March 31, 2020, to a low of 48.3 percent as of December 31, 2021. This decline is primarily attributed to both the steady increase in consumer deposits, as well as fluctuations in lending caused by the COVID-19 Pandemic and PPP lending. As shown in the following table, the bank’s average LTD ratio is within the range of two similarly-situated institutions, which examiners selected based on asset size, geographic location, and lending focus.

<b>Loan-to-Deposit Ratio Comparison</b>		
<b>Bank</b>	<b>Total Assets as of 09/30/2022 (\$000s)</b>	<b>Average Net LTD Ratio (%)</b>
<b>Citizens Bank of New Castle, Indiana</b>	<b>780,522</b>	<b>58.2</b>
Similarly-Situated Institution #1	643,981	64.3
Similarly-Situated Institution #2	445,244	45.0
<i>Source: Reports of Condition and Income 03/31/2020/ - 09/30/2022</i>		

#### **Assessment Area Concentration**

A majority of loans and other lending-related activities are inside the institution’s AAs overall. As shown in the following table, CSB made a majority of its home mortgage and small business loans, by number and dollar volume, within its AAs. Conversely, CSB made a majority of the sampled motor vehicle loans, by number and dollar volume, outside of the AAs. During the review period, CSB originated a large volume of indirect motor vehicle loans (1,206 loans totaling \$27.2 million)

through a network of over 30 active dealers. The active franchise and independent dealerships located within the bank’s AAs adequately serve the credit needs of low- and moderate-income borrowers in the AAs.

The percentage of loans CSB originated within its AAs is satisfactory overall, because the bank adequately addressed the community credit needs in the AAs. In addition, examiners placed greater emphasis on home mortgage lending in the overall conclusions, as noted earlier.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage										
2020	121	72.0	47	28.0	168	17,562	61.8	10,875	38.2	28,436
2021	136	76.4	42	23.6	178	24,577	71.6	9,733	28.4	34,310
<b>Subtotal</b>	<b>257</b>	<b>74.3</b>	<b>89</b>	<b>25.7</b>	<b>346</b>	<b>42,139</b>	<b>67.2</b>	<b>20,608</b>	<b>32.8</b>	<b>62,747</b>
Small Business-2021	91	64.1	51	35.9	142	18,391	62.5	11,055	37.5	29,446
Motor Vehicle-2021	95	37.0	162	63.0	257	2,264	39.9	3,415	60.1	5,679

*Source: HMDA Reported Data; Bank Data. Due to rounding, totals may not equal 100.0%*

**Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the AAs. A complete discussion of the performance for this criterion is in the separate AA sections of this evaluation.

**Borrower Profile**

The distribution of borrowers reflects reasonable penetration overall among retail customers of different income levels and businesses of different sizes. A complete discussion of the performance for this criterion is in the separate AA sections of this evaluation.

**Response to Complaints**

The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

**COMMUNITY DEVELOPMENT TEST**

CSB’s community development performance demonstrates adequate responsiveness to the community development needs in its AAs through community development loans, qualified investments, and community development services, as appropriate. Examiners considered the institution’s capacity and the need and availability of such opportunities. Examiners evaluated



CSB’s community development performance through comparisons to two similarly-situated banks, which have relatively similar asset sizes and operate in roughly the same geographic areas as CSB.

### **Community Development Loans**

During the evaluation period, CSB originated 155 community development loans totaling approximately \$20.7 million. This level of activity represents 2.7 percent of total assets, which was slightly lower, but comparable to both similarly-situated banks. Community development loans represented 5.4 percent of total loans as of June 30, 2022. The bank’s percentages were higher than both similarly-situated banks. Eighty-one of the community development loans totaling approximately \$4.5 million were PPP loans. Excluding PPP loans, the bank originated 74 community development loans totaling approximately \$16.2 million. This level of community development lending represents 2.1 percent of total assets and 4.3 percent of total loans as of June 30, 2022. Using these adjusted percentages, the bank’s performance is above that of one of the similarly-situated banks. Based on available information, examiners were not able to calculate adjusted percentages for the other institution. The following table details CSB’s community development lending by year and purpose.

<b>Community Development Lending</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</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>
2020	0	0	1	813	74	5,056	0	0	<b>75</b>	<b>5,869</b>
2021	2	80	0	0	35	4,999	3	616	<b>40</b>	<b>5,695</b>
2022	8	612	2	120	28	8,212	2	221	<b>40</b>	<b>9,165</b>
<b>Total</b>	<b>10</b>	<b>692</b>	<b>3</b>	<b>933</b>	<b>137</b>	<b>18,267</b>	<b>5</b>	<b>837</b>	<b>155</b>	<b>20,729</b>

*Source: Bank Records*

CSB has been responsive to the needs of its AAs; therefore, examiners included a community development loan in 2021 for \$29,000, which financed affordable housing and benefitted a broader regional area that includes the bank’s AAs. Additional details on the other community development loans are contained in the separate AA discussions later in this evaluation.

### **Qualified Investments**

The bank made 84 qualified investments, grants, and donations totaling approximately \$7.2 million within its AAs. Qualified investments totaled approximately \$7.1 million, and there were 67 grants and donations that totaled \$112,341. The total level of qualified equity investments and donations represents 0.9 percent of total assets and 2.3 percent of total securities as of June 30, 2022. This level of activity was below, yet still comparable to, the performance of one of the two similarly-situated banks and higher than the other institution.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	1	195	1	68	0	0	2	263
2020	0	0	0	0	2	620	0	0	2	620
2021	1	475	6	2,820	0	0	2	1,385	9	4,680
2022	1	500	3	1,010	0	0	0	0	4	1,510
<b>Subtotal</b>	<b>2</b>	<b>975</b>	<b>10</b>	<b>4,025</b>	<b>3</b>	<b>688</b>	<b>2</b>	<b>1,385</b>	<b>17</b>	<b>7,073</b>
Qualified Grants & Donations	3	8	21	45	43	59	0	0	67	112
<b>Total</b>	<b>5</b>	<b>983</b>	<b>31</b>	<b>4,070</b>	<b>46</b>	<b>747</b>	<b>2</b>	<b>1,385</b>	<b>84</b>	<b>7,185</b>

Source: Bank Records

As CSB met the needs of its AAs, examiners also considered investments made outside its AAs. During the review period, the bank purchased eight certificates of deposit totaling approximately \$2.0 million from Community Development Financial Institutions, located outside its AAs.

### **Community Development Services**

Bank employees provided 97 instances of financial expertise and technical assistance to various community development organizations throughout the AAs. These efforts supported each qualified community development purpose, but primarily focused on community services for low- and moderate-income individuals, as shown in the following table. CSB’s level of community development services was higher than both similarly-situated banks.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2020	1	28	19	2	50
2021	1	15	10	1	27
2022	1	10	7	2	20
<b>Total</b>	<b>3</b>	<b>53</b>	<b>36</b>	<b>5</b>	<b>97</b>

Source: Bank Records

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution’s overall CRA rating.

## INDIANA NON-MSA AA – Full-Scope Review

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

CSB’s Indiana Non-MSA AA includes Blackford, Henry, and Rush Counties in their entirety, as well as two tracts in Randolph County and one tract in Wells County.

CSB operates its headquarters, five full-service branches, and two limited-service branches in this AA. In 2020, CSB closed a branch office located in a middle-income census tract in Lewisville. In 2022, CSB closed branch offices located in moderate- and middle-income tracts in Dunkirk and Montpelier, respectively. The closures did not adversely affect the availability of services for low- and moderate-income individuals.

#### **Economic and Demographic Data**

The AA contains 25 census tracts with the following income levels: 7 moderate-income, 17 middle-income, and 1 upper-income. The following table details select demographic characteristics of the Indiana Non-MSA AA.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	0.0	28.0	68.0	4.0	0.0
Population by Geography	88,894	0.0	21.1	75.9	3.1	0.0
Housing Units by Geography	39,150	0.0	23.8	72.9	3.3	0.0
Owner-Occupied Units by Geography	25,121	0.0	18.7	77.6	3.6	0.0
Occupied Rental Units by Geography	9,085	0.0	34.4	63.6	2.1	0.0
Vacant Units by Geography	4,944	0.0	30.5	65.7	3.9	0.0
Businesses by Geography	5,462	0.0	21.7	74.8	3.5	0.0
Farms by Geography	737	0.0	6.2	77.6	16.1	0.0
Family Distribution by Income Level	23,298	21.9	19.9	21.6	36.5	0.0
Household Distribution by Income Level	34,206	25.7	18.4	19.1	36.9	0.0
Median Family Income Non-MSAs - IN		\$55,715	Median Housing Value			\$90,136
			Median Gross Rent			\$617
			Families Below Poverty Level			13.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Of the 5,462 non-farm businesses within the AA, 83.6 percent have Gross Annual Revenues (GARs) of \$1 million or less, while 3.4 percent have revenues over \$1 million, and 13.0 percent have unknown or unreported revenues. Approximately 89.1 percent of area businesses operate from

a single location, and 67.0 percent have four or fewer employees. The largest industry sector is the Service industry, which comprises 32.3 percent of businesses; followed by Non-Classifiable Establishments (14.9 percent); and Agriculture, Forestry, & Fishing (11.9 percent); and Retail Trade (11.7 percent).

Data obtained from the U.S. Bureau of Labor Statistics indicates that the 2021 year-end unemployment rate was 3.6 percent statewide and 3.9 percent nationally. As shown in the following table, the unemployment rates in Henry and Rush Counties generally remained below the state and national level during the evaluation period. The unemployment rates in Blackford County were above the state level and generally consistent with the national level.

<b>Unemployment Rates</b>			
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>November 2022</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Blackford County	8.1	3.7	3.4
Henry County	6.6	3.2	2.9
Rush County	6.3	2.8	2.3
State of Indiana	7.2	3.6	2.9
National Average	8.3	3.9	3.7

*Source: Bureau of Labor Statistics*

Examiners used the FFIEC-updated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table shows the low-, moderate-, middle-, and upper-income categories for the AA.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>IN NA Median Family Income (99999)</b>				
2020 (\$63,800)	<\$31,900	\$31,900 to <\$51,040	\$51,040 to <\$76,560	≥\$76,560
2021 (\$64,600)	<\$32,300	\$32,300 to <\$51,680	\$51,680 to <\$77,520	≥\$77,520

*Source: FFIEC*

### **Competition**

The AA is a moderately competitive market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2022, nine financial institutions operate 20 banking offices within the AA. Of these institutions, CSB ranks 1<sup>st</sup> with 39.4 percent of the deposit market share.

There is a moderate level of demand and a high level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders in the AA. In 2020, 255 lenders reported 4,566 originated or purchased residential mortgage loans. CSB ranked 6<sup>th</sup>, with a market share of 3.7 percent. The five most prominent lenders accounted for 34.0 percent of the total market share. In 2021, 264 lenders reported 5,078 originated or purchased residential

mortgage loans. CSB ranked 6<sup>th</sup>, with a market share of 3.5 percent. The five most prominent lenders accounted for 30.8 percent of the total market share.

The bank is not required to collect or report its small business lending data; therefore, analysis of small business loans does not include comparisons to aggregate data. However, aggregate data is useful in identifying the level of demand for such loans. In 2020, the most recent year with available data, 81 lenders reported 2,301 small business loan originations in the AA, indicating moderate demand and competition for this product. The five most prominent small business lenders accounted for 48.9 percent of total market share.

### **Community Contact(s)**

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs, and what credit and community development opportunities are available.

For this evaluation, examiners were unable to contact a third party willing to discuss the AA. Examiners utilized ACS and U.S. Census Data, regional economic reports, and other information to determine that there is a need for home mortgage, small business, and small farm loans within the AA. There are numerous bank offices throughout the area, but they are concentrated in small cities and towns, with outlying areas having few options and containing significant portions of farmland.

### **Credit and Community Development Needs and Opportunities**

Examiners determined that the primary needs throughout the assessment are home mortgage loans, and opportunities exist throughout the AA, including low-down payment and affordable home mortgage programs. Community needs include services targeted to low- and moderate-income people.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN INDIANA NON-MSA AA**

### **LENDING TEST**

CSB demonstrated reasonable performance in this AA under the Lending Test. Geographic Distribution and Borrower Profile performance support this conclusion.

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the AA overall. The bank's overall performance is the result of excellent home mortgage, reasonable motor vehicle, and poor small business lending performance. Examiners focused on the percentage by number of loans in moderate-income census tracts. As noted previously, the AA does not contain any low-income tracts.

### Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the AA. Examiners focused on the comparison to aggregate HMDA data. As shown in the following table, in both 2020 and 2021, the bank's lending performance in the moderate-income tracts exceeded the aggregate performance.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Moderate						
2020	18.7	12.3	21	20.8	2,899	29.5
2021	18.7	14.8	19	16.4	1,235	8.2
Middle						
2020	77.6	83.9	76	75.2	6,569	66.9
2021	77.6	82.1	94	81.0	13,598	89.8
Upper						
2020	3.6	3.8	4	4.0	346	3.5
2021	3.6	3.1	3	2.6	315	2.1
<b>Totals</b>						
<b>2020</b>	<b>100.0</b>	<b>100.0</b>	<b>101</b>	<b>100.0</b>	<b>9,814</b>	<b>100.0</b>
<b>2021</b>	<b>100.0</b>	<b>100.0</b>	<b>116</b>	<b>100.0</b>	<b>15,148</b>	<b>100.0</b>
<i>Source: 2015 ACS; Bank Data, 2020 &amp; 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

### Motor Vehicle Loans

The geographic distribution of sampled motor vehicle loans reflects reasonable dispersion throughout the AA. As shown in the following table, the bank's lending performance by number of loans in the moderate-income tracts is consistent with the percentage of households. While the percentage of households is not reflective of the demand for motor vehicle loans at each tract income level, the level of lending evidences a commitment to extend motor vehicle loans to borrowers located in these tracts.

Geographic Distribution of Motor Vehicle Loans (2021)					
Tract Income Level	% of Households	#	%	\$(000s)	%
Moderate	22.9	16	22.2	296	17.9
Middle	73.9	55	76.4	1,345	81.3
Upper	3.2	1	1.4	14	0.8
<b>Totals</b>	<b>100.0</b>	<b>72</b>	<b>100.0</b>	<b>1,655</b>	<b>100.0</b>
<i>Source: 2015 ACS; 1/1/2021 – 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%</i>					

### ***Small Business Loans***

The geographic distribution of small business loans reflects poor dispersion throughout the AA. As shown in the following table, in 2021, the bank did not grant any loans in the moderate-income tracts, despite these areas having 21.7 percent of the businesses in the AA. Two of CSB's six banking offices in the AA are located within moderate-income tracts, and four other branch offices are located near or adjacent to moderate-income tracts. Although CSB is not required to report small business data, the aggregate data is indicative of the demand for small business loans. Aggregate data for 2021 show that reporting lenders made roughly 15.3 percent of small business loans, by number of loans, in the AA's moderate-income tracts, evidencing sufficient demand and opportunity to extend small business loans to borrowers in these tracts.

<b>Geographic Distribution of Small Business Loans (2021)</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	21.7	0	0.0	0	0.0
Middle	74.8	50	96.2	9,140	99.1
Upper	3.5	2	3.8	80	0.9
<b>Totals</b>	<b>100.0</b>	<b>52</b>	<b>100.0</b>	<b>9,220</b>	<b>100.0</b>

*Source: 2021 D&B Data; Bank Data; Due to rounding, totals may not equal 100.0%*

### **Borrower Profile**

The distribution of lending reflects reasonable penetration among individuals of different income levels and businesses of different sizes in the AA. CSB's reasonable performance in home mortgage, motor vehicle, and small business lending supports the overall conclusion.

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

The distribution of lending reflects reasonable penetration overall among individuals of different income levels. Examiners focused on the comparison to aggregate HMDA data, as it serves as a better indicator of opportunities to lend, particularly to low-income families where the percentage of families below the poverty level in the AA was 13.4 percent. These families typically do not possess the financial means to qualify for or afford a traditional home mortgage loan. As shown in the following table, CSB's lending to low-income families in 2020 and 2021 exceeds aggregate performance. CSB's lending to moderate-income families in 2020 and 2021 slightly trails aggregate performance, but is consistent with the percentage of moderate-income families in the AA.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2020	21.9	7.7	10	9.9	392	4.0
2021	21.9	9.5	15	12.9	842	5.6
Moderate						
2020	19.9	22.6	20	19.8	1,261	12.9
2021	19.9	22.9	23	19.8	1,753	11.6
Middle						
2020	21.6	20.3	33	32.7	2,931	29.9
2021	21.6	22.1	34	29.3	3,309	21.8
Upper						
2020	36.5	31.8	31	30.7	3,295	33.6
2021	36.5	27.7	37	31.9	6,753	44.6
Not Available						
2020	0.0	17.6	7	6.9	1,935	19.7
2021	0.0	17.8	7	6.0	2,490	16.4
<b>Totals</b>						
<b>2020</b>	<b>100.0</b>	<b>100.0</b>	<b>101</b>	<b>100.0</b>	<b>9,814</b>	<b>100.0</b>
<b>2021</b>	<b>100.0</b>	<b>100.0</b>	<b>116</b>	<b>100.0</b>	<b>15,148</b>	<b>100.0</b>

Source: 2015 ACS; Bank Data, 2020 & 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

### Motor Vehicle Loans

The distribution of lending reflects reasonable penetration among households of different income levels. Though CSB's lending performance to low-income households lagged the percentage of households, as shown in the following table, its lending performance to moderate-income households is consistent with the percentage of households. Considering CSB's performance to moderate-income households, overall performance is reasonable.

Distribution of Motor Vehicle Loans by Borrower Income Level (2021)					
Borrower Income Level	% of Households	#	%	\$(000s)	%
Low	25.7	10	13.9	121	7.3
Moderate	18.4	13	18.1	265	16.0
Middle	19.1	25	34.7	509	30.8
Upper	36.9	24	33.3	760	45.9
<b>Totals</b>	<b>100.0</b>	<b>72</b>	<b>100.0</b>	<b>1,655</b>	<b>100.0</b>

Source: 2015 ACS; 1/1/2021 – 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%



### ***Small Business Loans***

The distribution of lending reflects reasonable penetration among businesses of different sizes. As shown in the following table, CSB’s lending to businesses with GARs of \$1 million or less trailed the percentage of businesses. The percentage of businesses, however, is not necessarily indicative of the demand for small business loans by those businesses. Combined with the fact that smaller businesses tend to seek alternative forms of financing, such as credit cards or home equity lines of credit, it is expected that the bank’s performance would trail the demographic. CSB is not required to collect or report small business lending data; however, aggregate data is nonetheless useful in determining the level of demand for small business loans. Aggregate data for 2021 show that reporting lenders made roughly 51.7 percent of their small business loans in the AA to businesses with GARs of \$1 million or less. CSB’s performance, therefore, is adequate, considering the demand for small business loans in the AA.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category (2021)</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	83.6	33	63.5	2,966	32.2
>\$1,000,000	3.4	19	36.5	6,254	67.8
Revenue Not Available	13.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>52</b>	<b>100.0</b>	<b>9,220</b>	<b>100.0</b>

*Source: 2021 D&B Data; Bank Data; Due to rounding, totals may not equal 100.0%*

## **COMMUNITY DEVELOPMENT TEST**

CSB demonstrates adequate responsiveness to the community development needs of the AA through community development loans, qualified investments, and community development services. Examiners considered the institution’s capacity and the need and availability of such opportunities.

### **Community Development Loans**

During the evaluation period, the bank originated 121 community development loans totaling approximately \$12.7 million in this AA. Sixty loans totaling approximately \$2.1 million were PPP loans guaranteed by the SBA. As noted earlier, PPP loans allowed businesses to retain and rehire workers in the wake of the COVID-19 pandemic. In addition to these PPP loans, the bank originated 61 other community development loans totaling \$10.6 million. The following table details the bank’s community development lending by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020	0	0	0	0	57	3,576	0	0	57	3,576
2021	1	51	0	0	26	1,166	0	0	27	1,217
2022	7	519	2	120	26	7,047	2	221	37	7,907
<b>Total</b>	<b>8</b>	<b>570</b>	<b>2</b>	<b>120</b>	<b>109</b>	<b>11,789</b>	<b>2</b>	<b>221</b>	<b>121</b>	<b>12,700</b>

Source: Bank Records

Notable examples of the bank’s community development loans in this AA include:

- In 2020, financed a restaurant that provided jobs for low- and moderate-income individuals.
- In 2021, financed a dental firm that provides services to low- and moderate-income families.
- In 2022, originated a \$4.4 million SBA 504 loan that financed the purchase of a new building and allowed the business to hire additional employees.

### Qualified Investments

The bank made 59 qualified investments totaling approximately \$4.8 million within this AA. This total includes qualified investments of approximately \$4.7 million and donations totaling \$90,000.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	1	195	1	68	0	0	2	263
2020	0	0	0	0	2	620	0	0	2	620
2021	0	0	4	1,775	0	0	1	1,060	5	2,835
2022	0	0	3	1,010	0	0	0	0	3	1,010
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>2,980</b>	<b>3</b>	<b>688</b>	<b>1</b>	<b>1,060</b>	<b>12</b>	<b>4,728</b>
Qualified Grants & Donations	0	0	15	35	32	55	0	0	47	90
<b>Total</b>	<b>0</b>	<b>0</b>	<b>23</b>	<b>3,015</b>	<b>35</b>	<b>743</b>	<b>1</b>	<b>1,060</b>	<b>59</b>	<b>4,818</b>

Source: Bank Records

Notable examples of the bank’s qualified investments, grants, and donations include:

- In 2021, purchased three bonds totaling \$1.5 million, to finance a school where at least half of the students receive free or reduced cost lunches.
- In 2020 and 2021, donated \$10,000 to a food pantry that serves low- and moderate-income families.

### Community Development Services

During the evaluation period, bank employees provided 63 instances of financial expertise or technical assistance to community development-related organizations in the AA. The majority of

community development services supported the provision of various community services for low- and moderate-income individuals in the AA.

<b>Community Development Services</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	0	18	14	2	<b>34</b>
2021	1	6	7	1	<b>15</b>
2022	1	7	4	2	<b>14</b>
<b>Total</b>	<b>2</b>	<b>31</b>	<b>25</b>	<b>5</b>	<b>63</b>
<i>Source: Bank Records</i>					

Notable examples of the bank’s community development services in this AA include:

- A bank employee serves as a director of a revolving loan funding organization that provides financing to local small businesses.
- A bank employee serves on the board of a non-profit organization that provides housing to low- and moderate-income individuals in the AA.

## INDIANAPOLIS-CARMEL-ANDERSON, IN MSA AA – Limited-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN INDIANAPOLIS-CARMEL-ANDERSON, IN MSA AA

CSB’s Indianapolis-Carmel-Anderson MSA AA includes Hamilton and Madison Counties in their entirety, and this delineation is unchanged from the prior evaluation. CSB operates three full-service offices in this AA. The following table details select demographic characteristics of the AA.

<b>Demographic Information of the Assessment Area</b>						
<b>Indianapolis MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	76	7.9	17.1	32.9	40.8	1.3
Population by Geography	426,915	3.0	11.1	25.4	59.7	0.8
Housing Units by Geography	172,603	4.1	13.7	26.3	55.8	0.0
Owner-Occupied Units by Geography	120,218	1.8	9.7	27.1	61.4	0.0
Occupied Rental Units by Geography	39,309	7.7	21.8	23.6	47.0	0.0
Vacant Units by Geography	13,076	15.1	26.6	27.0	31.3	0.0
Businesses by Geography	53,356	2.4	9.0	16.1	72.5	0.0
Farms by Geography	1,640	1.5	7.0	40.7	50.8	0.0
Family Distribution by Income Level	113,501	13.9	14.3	18.1	53.8	0.0
Household Distribution by Income Level	159,527	16.6	13.1	16.0	54.3	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA	\$66,803		Median Housing Value			\$180,496
			Median Gross Rent			\$903
			Families Below Poverty Level			6.2%
<small>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0%                      (*) The NA category consists of geographies that have not been assigned an income classification.</small>						

Of the 53,356 non-farm businesses within the AA, 90.3 percent have GARs of \$1 million or less, while 3.2 percent have revenues over \$1 million, and 6.6 percent have unknown or unreported revenues. 93.7 percent of area businesses operate from a single location, while 61.5 percent have four or fewer employees. The largest industry sector is the Service industry, which comprises 37.6 percent of businesses; followed by Non-Classifiable Establishments (25.4 percent); and Finance, Insurance, and Real Estate (12.8 percent); and Retail Trade (8.2 percent).

Data obtained from the U.S. Bureau of Labor Statistics indicates that the 2021 year-end unemployment rate was 3.6 percent statewide. Within the AA, the year-end 2021 unemployment rate for Hamilton County was 2.2 percent and 4.1 percent for Madison County. Consistent with regional and national unemployment trends related to the COVID-19 pandemic, the AA

experienced a significant increase in unemployment rates with the onset of the pandemic in early 2020, followed by a consistent reduction in unemployment rates through 2021.

The AA is a moderately competitive market for financial services. According to FDIC Deposit Market Share data as of June 30, 2022, 29 financial institutions operate 113 banking offices within the AA. Of these institutions, CSB ranks 24<sup>th</sup> with 0.4 percent of the market share.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN INDIANAPOLIS-CARMEL-ANDERSON, IN MSA AA**

### **LENDING TEST**

The institution's lending performance in the Indianapolis-Carmel-Anderson, IN MSA AA is generally consistent with the institution's lending performance in the Indiana Non-MSA AA overall. However, examiners noted weaker performance than the Non-MSA AA with regard to the geographic distribution of motor vehicle loans.

### **Geographic Distribution**

The following tables detail the bank's geographic distribution performance in this AA.

**Home Mortgage Loans**

Geographic Distribution of Home Mortgage Loans						
Indianapolis MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2020	1.8	0.3	0	0.0	0	0.0
2021	1.8	0.4	0	0.0	0	0.0
Moderate						
2020	9.7	3.3	0	0.0	0	0.0
2021	9.7	5.2	3	15.0	2,390	25.3
Middle						
2020	27.1	18.5	9	45.0	2,467	31.8
2021	27.1	21.4	10	50.0	1,967	20.9
Upper						
2020	61.4	77.9	11	55.0	5,281	68.2
2021	61.4	72.7	7	35.0	5,072	53.8
Not Available						
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	0.2	0	0.0	0	0.0
<b>Totals</b>						
<b>2020</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>7,748</b>	<b>100.0</b>
<b>2021</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>9,430</b>	<b>100.0</b>

*Source: 2015 ACS; Bank Data, 2020 & 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

**Motor Vehicle Loans**

Geographic Distribution of Motor Vehicle Loans (2021)					
Indianapolis MSA AA					
Tract Income Level	% of Households	#	%	\$(000s)	%
Low	3.2	0	0.0	0	0.0
Moderate	12.7	0	0.0	0	0.0
Middle	26.3	3	13.0	78	12.8
Upper	57.8	20	87.0	531	87.2
<b>Totals</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>609</b>	<b>100.0</b>

*Source: 2015 ACS; Bank Data. Due to rounding, totals may not equal 100.0%*

### ***Small Business Loans***

<b>Geographic Distribution of Small Business Loans</b>					
<b>Indianapolis MSA AA</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	2.4	0	0.0	0	0.0
Moderate	9.0	0	0.0	0	0.0
Middle	16.1	21	53.8	4,132	45.1
Upper	72.5	18	46.2	5,039	54.9
<b>Totals</b>	<b>100.0</b>	<b>39</b>	<b>100.0</b>	<b>9,171</b>	<b>100.0</b>

*Source: 2020 & 2021 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%*

### **Borrower Profile**

The following tables detail the bank's performance regarding lending to individuals of different income levels and businesses of different sizes in this AA.

### Home Mortgage Loans

Distribution of Home Mortgage Loans by Borrower Income Level						
Indianapolis MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2020	13.9	4.2	1	5.0	60	0.8
2021	13.9	5.1	0	0.0	0	0.0
Moderate						
2020	14.3	12.9	0	0.0	0	0.0
2021	14.3	13.4	3	15.0	534	5.7
Middle						
2020	18.1	18.4	4	20.0	680	8.8
2021	18.1	18.9	6	30.0	1,066	11.3
Upper						
2020	53.8	50.1	14	70.0	5,908	76.3
2021	53.8	47.1	8	40.0	4,317	45.8
Not Available						
2020	0.0	14.4	1	5.0	1,100	14.2
2021	0.0	15.5	3	15.0	3,512	37.2
<b>Totals</b>						
<b>2020</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>7,748</b>	<b>100.0</b>
<b>2021</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>9,430</b>	<b>100.0</b>

Source: 2015 ACS; Bank Data, 2020 & 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

### Motor Vehicle Loans

Distribution of Motor Vehicle Loans by Borrower Income Level					
Indianapolis MSA AA					
Borrower Income Level	% of Households	#	%	\$(000s)	%
Low	16.6	0	0.0	0	0.0
Moderate	13.1	4	17.4	97	15.9
Middle	16.0	7	30.4	126	20.7
Upper	54.3	12	52.2	386	63.4
<b>Totals</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>609</b>	<b>100.0</b>

Source: 2015 ACS; Bank Data. Due to rounding, totals may not equal 100.0%



### ***Small Business Loans***

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Indianapolis MSA AA</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	90.3	32	82.1	5,921	64.6
>\$1,000,000	3.2	7	17.9	3,250	35.4
Revenue Not Available	6.6	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>39</b>	<b>100.0</b>	<b>9,171</b>	<b>100.0</b>

*Source: 2020 & 2021 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%*

### **COMMUNITY DEVELOPMENT TEST**

The institution's community development performance in the Indianapolis-Carmel-Anderson, IN MSA AA is consistent with the community development performance for the Indiana Non-MSA AA.

#### **Community Development Loans**

During the evaluation period, the bank originated 33 community development loans totaling approximately \$8.0 million in the AA. Twenty-one loans totaling approximately \$2.4 million were PPP loans, which allowed businesses to retain and rehire workers in the wake of the COVID-19 pandemic. In addition to these PPP loans, the bank originated 12 other community development loans totaling \$5.6 million.

#### **Qualified Investments**

The bank made 25 qualified investments, grants and donations totaling approximately \$2.4 million in the AA. This total includes 5 qualified investments totaling approximately \$2.3 million and 20 donations totaling \$22,000.

#### **Community Development Services**

During the evaluation period, bank employees provided 34 instances of financial expertise or technical assistance to community development-related organizations in the AA. The majority of community development services supported the provision of various community services for low- and moderate-income individuals in the AA.

## APPENDICES

### INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### **Community Development Test**

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

## GLOSSARY

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
  - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

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

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g, innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

**Low-Income:** 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 geography.

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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 metropolitan area/assessment area.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area** (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

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

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

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

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.



## Locations, Hours of Operation, & Census Tract – 2025


- **New Castle Downtown ( Main)**
  - 1238 Broad Street, New Castle, IN 47362
    - Monday – Friday 9:00 – 5:00
  - Drive Up
    - Monday – Friday 8:30 – 5:00
    - Saturday 9:00 – noon
  - ATM
  - Census Tract: 180659760.00
  
- **New Castle Trojan Plaza**
  - 120-D S. Memorial Drive, New Castle, IN 47362
  - ATM Location only
  - Census Tract: 180659760.00
  
- **New Castle, Raintree**
  - 1726 S. Memorial Drive, New Castle, IN 47362
    - Monday – Friday 9:00 – 5:00
    - Saturday 9:00 - noon
  - Drive Up
    - Monday – Friday 8:30 – 5:00
    - Saturday 9:00 – noon
  - ATM
  - Census Tract: 180659764.00
  
- **New Castle, Payne Village**
  - 1810 Riley Rd, New Castle, IN 47362
  - ATM Location only
  - Census Tract: 180659764.00
  
- **Knightstown**
  - 475 N. McCullum Street, Knightstown, IN 46148
    - Monday - Friday 9:00 – 5:00
    - Saturday 9:00 - noon
  - Drive up
    - Monday – Friday 8:30 - 5:00
    - Saturday 9:00 - noon
  - ATM
  - Census Tract: 180659767.00
  
- **Rushville**
  - 1802 N Main Street, Rushville , IN 46173
    - Monday - Friday 9:00 – 5:00
    - Saturday 9:00 - noon
  - Drive up

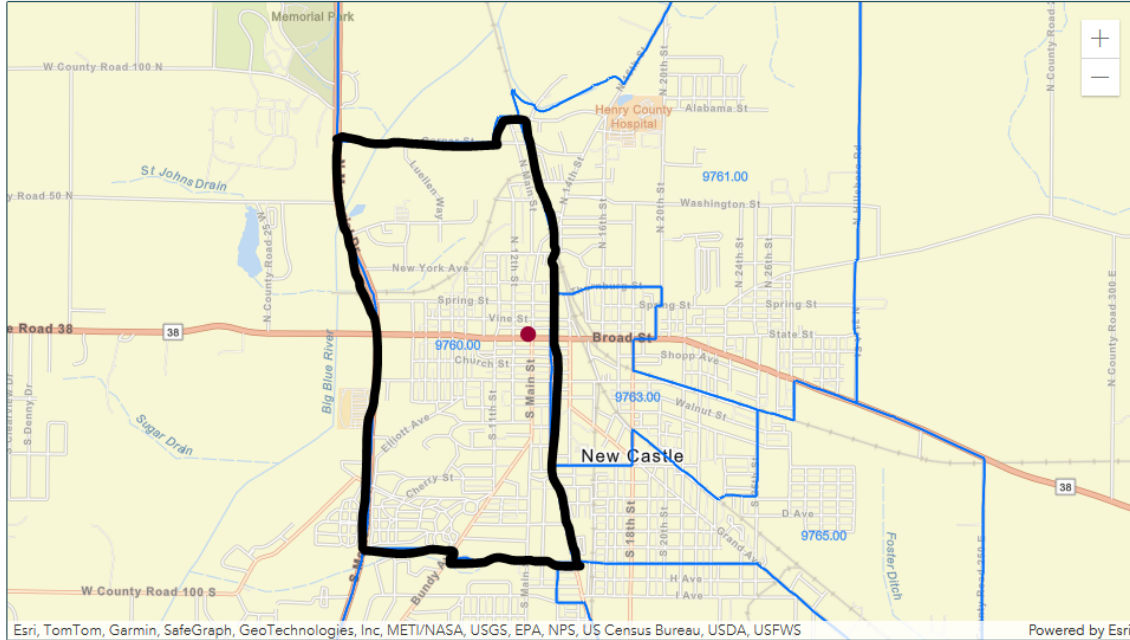
- Monday – Friday 8:30-5:00
    - Saturday 9:00-noon
  - ATM
  - Census Tract: 181399744.00
- **Carmel**
  - 902 S. Rangeline Rd, Carmel, IN 46032
    - Monday - Friday 9:00 – 5:00
  - Drive up
    - Monday – Friday 8:30-5:00
  - ATM
  - Census Tract: 180571110.11
- **Fishers**
  - 9 Municipal Drive, Ste 5, Fishers, IN 46038
    - Monday – Friday 9:00 – 5:00
  - ATM
  - Census Tract: 180571108.12
- **Pendleton**
  - 129 S. Pendleton Ave, Pendleton, IN 46064
    - Monday - Friday 9:00 – 5:00
    - Saturday 9:00 - noon
  - Drive up
    - Monday – Friday 8:30 - 5:00
    - Saturday 9:00-noon
  - ATM
  - Census Tract: 180950117.00
- **Hartford City North**
  - 1515 N. Walnut Street, Hartford City, IN 47348
    - Monday - Friday 9:00 – 5:00
    - Saturday 9:00 - noon
  - Drive up
    - Monday – Friday 8:30-5:00
    - Saturday 9:00-noon
  - ATM
  - Census Tract: 180099752.00
- **Harford City Downtown- Drive up location**
  - 222 W Washington Street, Hartford City, IN 47348
    - Monday – Friday 9:00 – 5:00
  - ATM
  - Census Tract: 180099753.00
- **Union City**
  - 200 W. Oak Street, Union City, IN 47390
    - Monday – Friday 9:00 – 5:00

- Saturday 9:00 – noon
- Drive up
  - Monday – Friday 8:30 – 5:00
  - Saturday 9:00-noon
- ATM
- Census Tract: 181359516.00

## Maps of Facility Based Assessment Areas

### New Castle – Main Branch & Trojan Plaza ATM

 FFIEC Geocoding/Mapping System -- 2025



● Matched Address: 1238 Broad St, New Castle, Indiana, 47362  
 MSA: NA - NA (Outside of MSA) || State: 18 - INDIANA || County: 065 - HENRY COUNTY || Tract Code: 9760.00

● Selected Tract  
 MSA: || State: || County: || Tract Code:

 2025 FFIEC Geocode Census Report

Matched Address: 1238 Broad St, New Castle, Indiana, 47362  
 MSA: NA - NA (Outside of MSA)  
 State: 18 - INDIANA  
 County: 065 - HENRY COUNTY  
 Tract Code: 9760.00

#### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSA/MD/non-MSAMD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

#### Census Population Information

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

#### Census Income Information

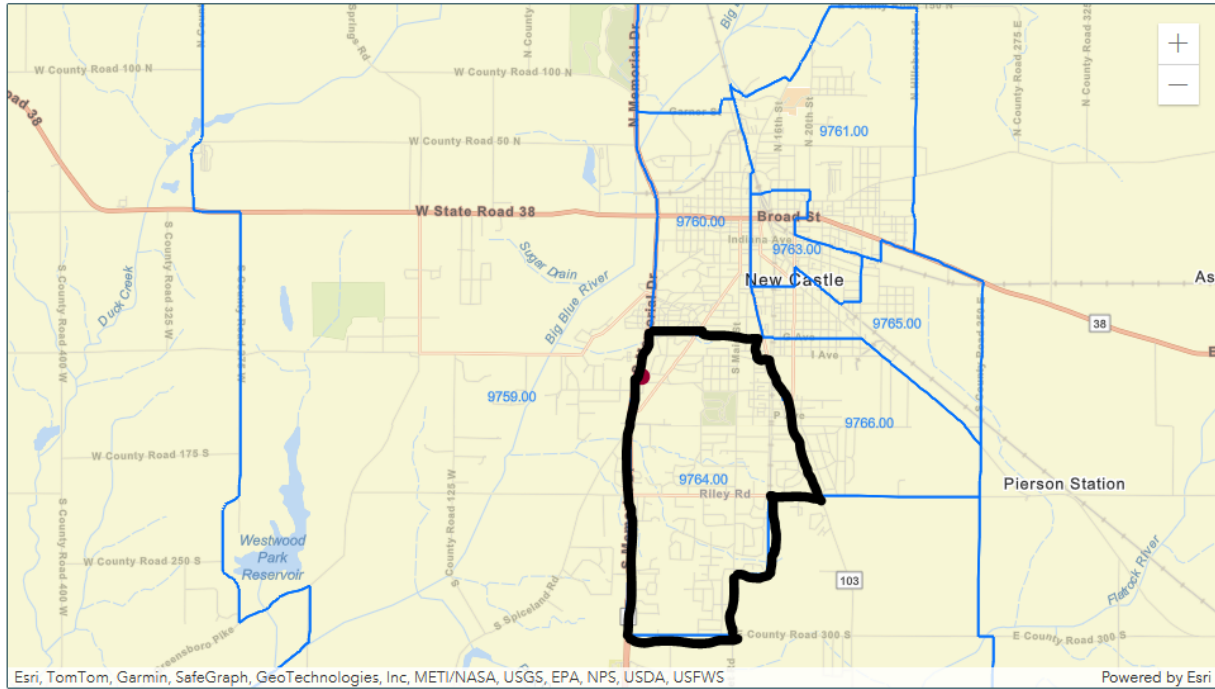
Tract Income Level	
2020 MSA/MD/statewide non-MSAMD Median Family Income	
2025 FFIEC Estimated MSA/MD/non-MSAMD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

#### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	

# New Castle – Raintree & Paine Village ATM

FFIEC FFIEC Geocoding/Mapping System -- 2025



● Matched Address: 1726 S Memorial Dr, New Castle, Indiana, 47362  
 MSA: NA - NA (Outside of MSA) || State: 18 - INDIANA || County: 065 - HENRY COUNTY || Tract Code: 9764.00

● Selected Tract  
 MSA: || State: || County: || Tract Code:

FFIEC 2025 FFIEC Geocode Census Report

Matched Address: 1726 S Memorial Dr, New Castle, Indiana, 47362  
 MSA: NA - NA (Outside of MSA)  
 State: 18 - INDIANA  
 County: 065 - HENRY COUNTY  
 Tract Code: 9764.00

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Population Information

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

### Census Income Information

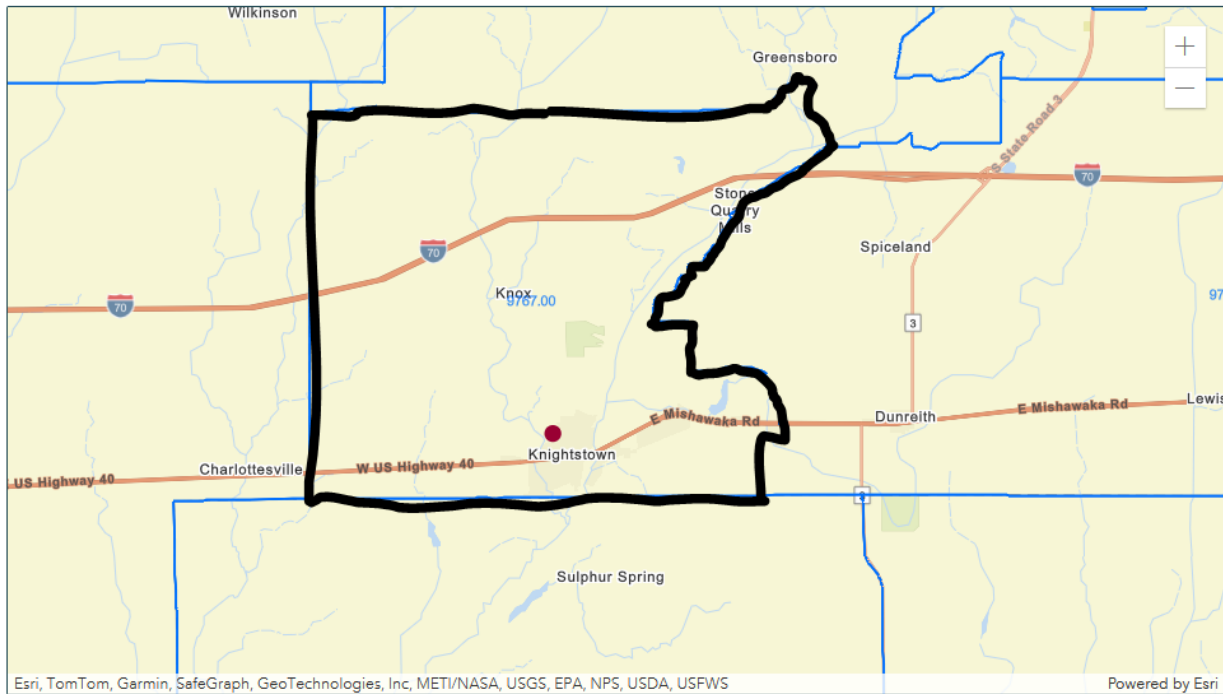
Tract Income Level	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	

# Knightstown

**FFIEC** FFIEC Geocoding/Mapping System -- 2025



● Matched Address: 475 N McCullum St, Knightstown, Indiana, 46148  
 MSA: NA - NA (Outside of MSA) || State: 18 - INDIANA || County: 065 - HENRY COUNTY || Tract Code: 9767.00

● Selected Tract  
 MSA: || State: || County: || Tract Code:

**FFIEC** 2025 FFIEC Geocode Census Report

Matched Address: 475 N McCullum St, Knightstown, Indiana, 46148  
 MSA: NA - NA (Outside of MSA)  
 State: 18 - INDIANA  
 County: 065 - HENRY COUNTY  
 Tract Code: 9767.00

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Income Information

Tract Income Level	
2020 MSAMD/staterwide non-MSA/MD Median Family Income	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	


### Census Population Information

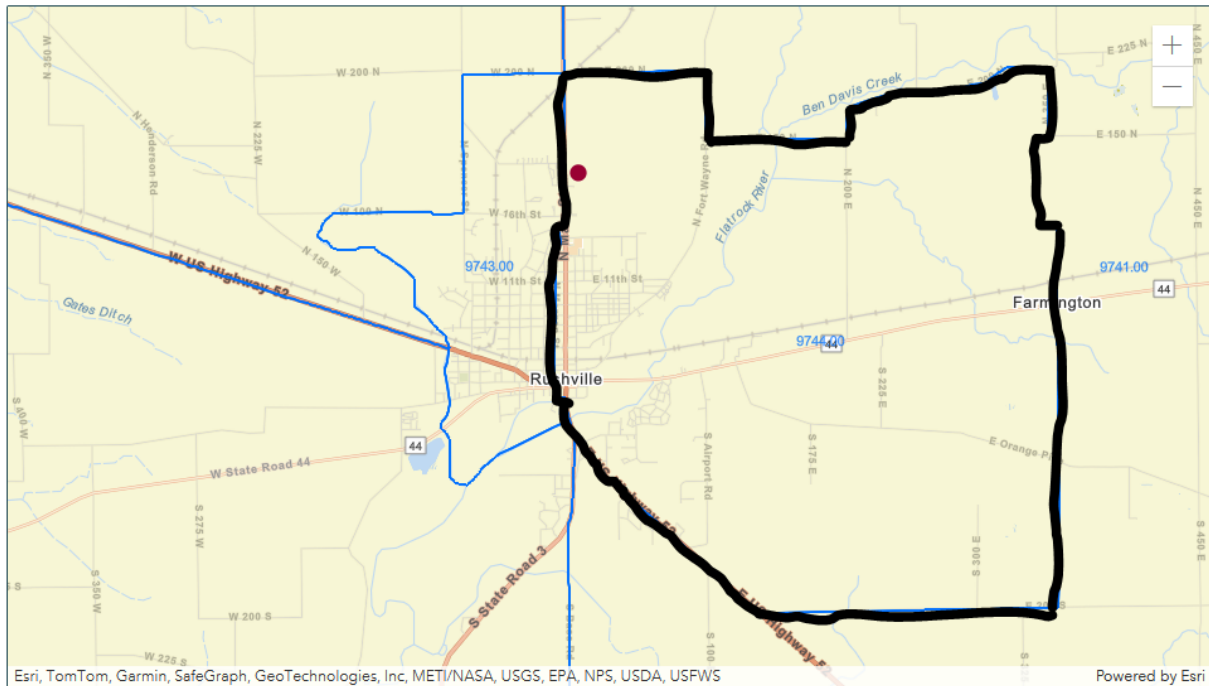
Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	

# Rushville

 FFIEC Geocoding/Mapping System -- 2025



● Matched Address: 1802 N Main St, Rushville, Indiana, 46173  
 MSA: NA - NA (Outside of MSA) || State: 18 - INDIANA || County: 139 - RUSH COUNTY || Tract Code: 9744.00

● Selected Tract  
 MSA: || State: || County: || Tract Code:

 2025 FFIEC Geocode Census Report

Matched Address: 1802 N Main St, Rushville, Indiana, 46173  
 MSA: NA - NA (Outside of MSA)  
 State: 18 - INDIANA  
 County: 139 - RUSH COUNTY  
 Tract Code: 9744.00

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Population Information

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

### Census Income Information

Tract Income Level	
2020 MSAMD/statewide non-MSAMD Median Family Income	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

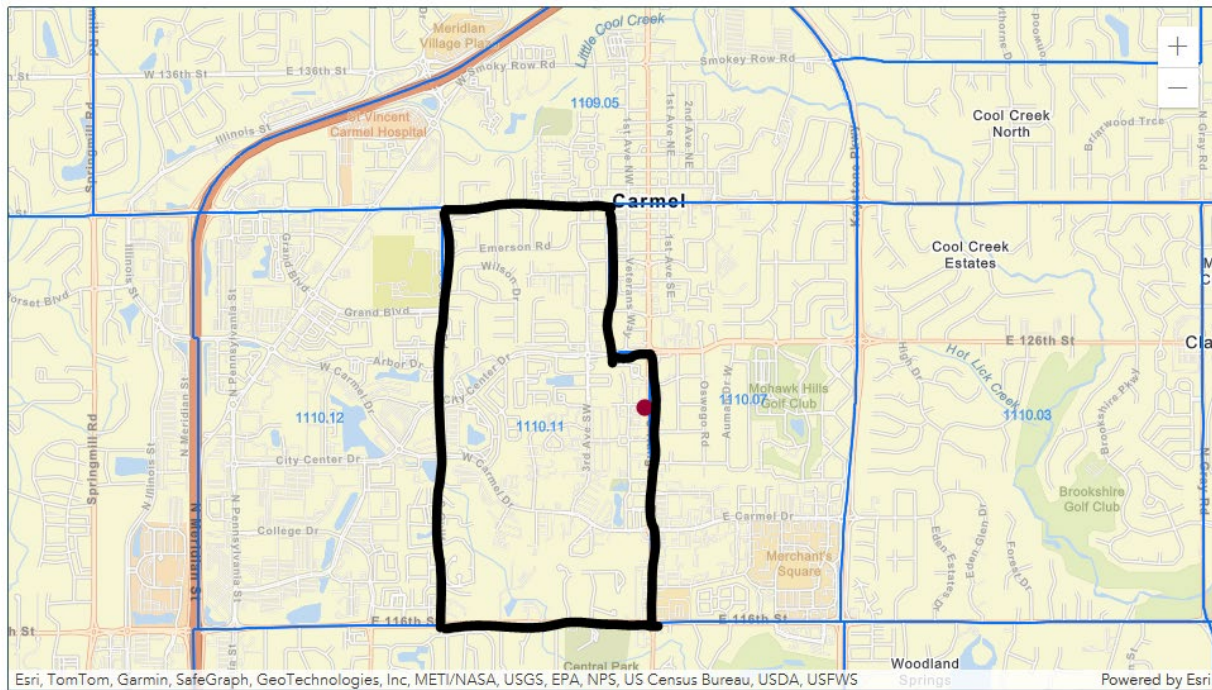
### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	




# Carmel

 FFIEC Geocoding/Mapping System -- 2025



 Matched Address: 902 S Rangeline Rd, Carmel, Indiana, 46032  
 MSA: 26900 - INDIANAPOLIS-CARMEL-GREENWOOD, IN || State: 18 - INDIANA || County: 057 - HAMILTON COUNTY || Tract Code: 1110.11

 Selected Tract  
 MSA: || State: || County: || Tract Code:

 2025 FFIEC Geocode Census Report

Matched Address: 902 S Rangeline Rd, Carmel, Indiana, 46032  
 MSA: 26900 - INDIANAPOLIS-CARMEL-GREENWOOD, IN  
 State: 18 - INDIANA  
 County: 057 - HAMILTON COUNTY  
 Tract Code: 1110.11

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Population Information

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

### Census Income Information

Tract Income Level	
2020 MSAMD/statewide non-MSAMD Median Family Income	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

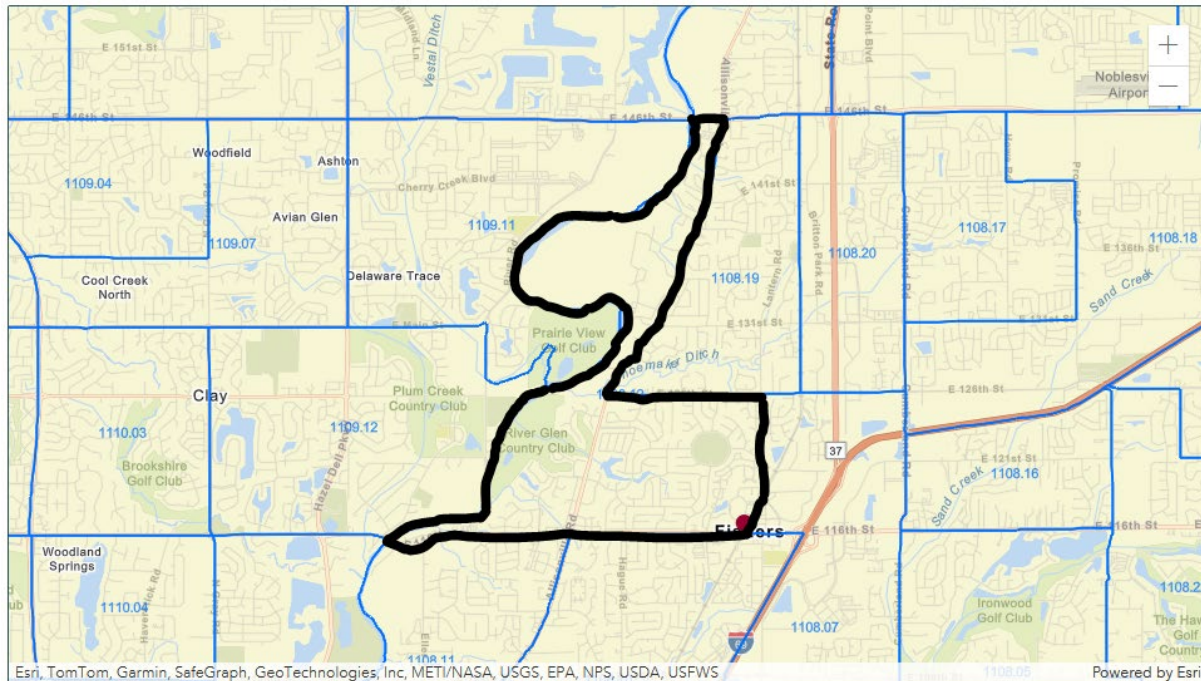
### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	




# Fishers

 FFIEC Geocoding/Mapping System -- 2025



 Matched Address: 9 Municipal Dr, Fishers, Indiana, 46038  
MSA: 26900 - INDIANAPOLIS-CARMEL-GREENWOOD, IN || State: 18 - INDIANA || County: 057 - HAMILTON COUNTY || Tract Code: 1108.12

 Selected Tract  
MSA: || State: || County: || Tract Code:

 2025 FFIEC Geocode Census Report

Matched Address: 9 Municipal Dr, Fishers, Indiana, 46038  
MSA: 26900 - INDIANAPOLIS-CARMEL-GREENWOOD, IN  
State: 18 - INDIANA  
County: 057 - HAMILTON COUNTY  
Tract Code: 1108.12

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Population Information

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

### Census Income Information

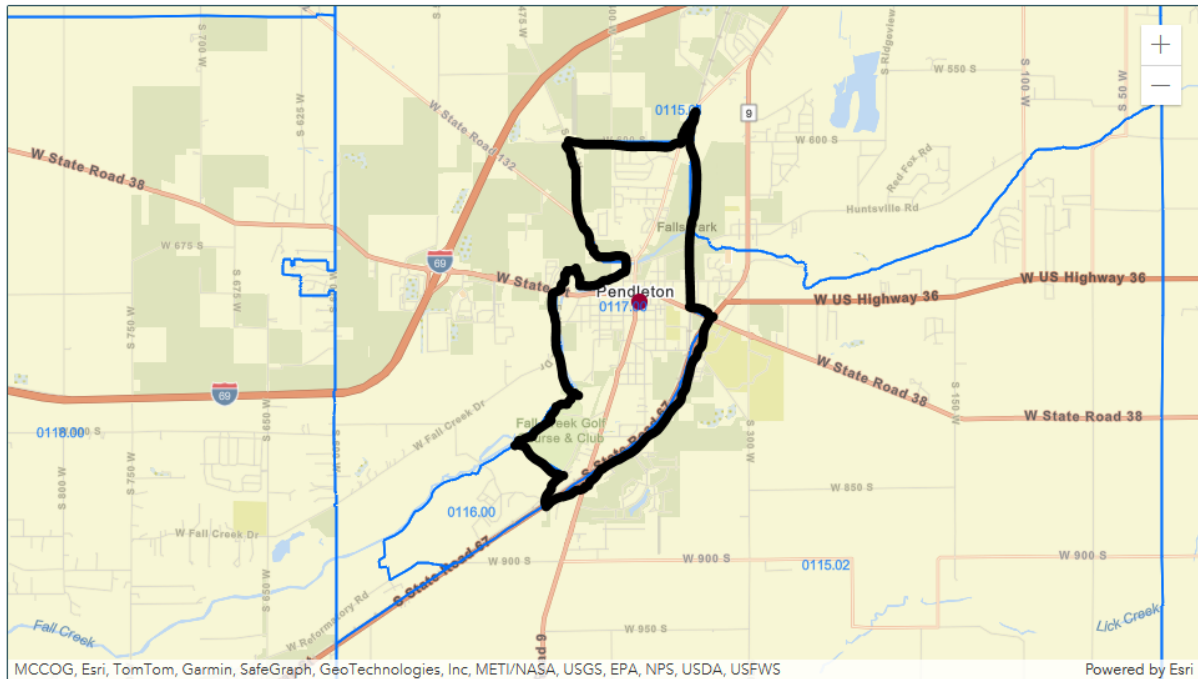
Tract Income Level	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	

# Pendleton

FFIEC FFIEC Geocoding/Mapping System -- 2025



● Matched Address: 129 S Pendleton Ave, Pendleton, Indiana, 46064  
 MSA: 26900 - INDIANAPOLIS-CARMEL-GREENWOOD, IN || State: 18 - INDIANA || County: 095 - MADISON COUNTY || Tract Code: 0117.00

● Selected Tract  
 MSA: || State: || County: || Tract Code:

FFIEC 2025 FFIEC Geocode Census Report

Matched Address: 129 S Pendleton Ave, Pendleton, Indiana, 46064  
 MSA: 26900 - INDIANAPOLIS-CARMEL-GREENWOOD, IN  
 State: 18 - INDIANA  
 County: 095 - MADISON COUNTY  
 Tract Code: 0117.00

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Population Information

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	


### Census Income Information

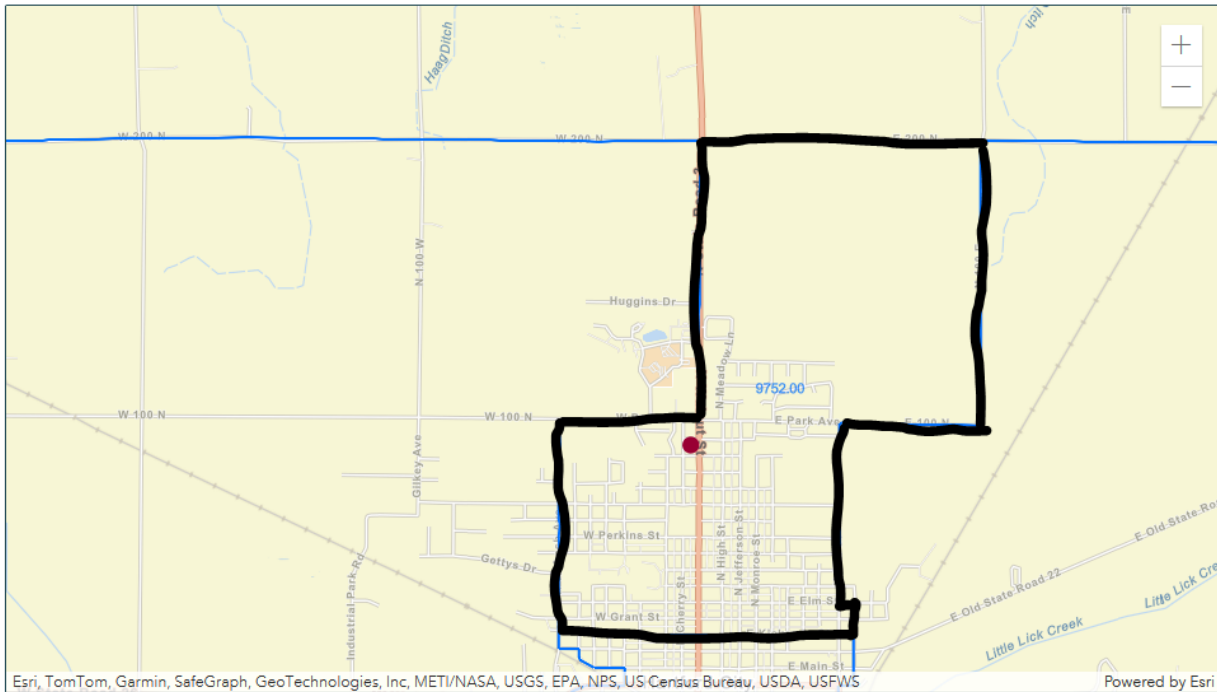
Tract Income Level	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	

# Hartford City North

 FFIEC Geocoding/Mapping System -- 2025



● Matched Address: 1515 N Walnut St, Hartford City, Indiana, 47348  
 MSA: NA - NA (Outside of MSA) || State: 18 - INDIANA || County: 009 - BLACKFORD COUNTY || Tract Code: 9752.00

● Selected Tract  
 MSA: || State: || County: || Tract Code:

 2025 FFIEC Geocode Census Report

Matched Address: 1515 N Walnut St, Hartford City, Indiana, 47348  
 MSA: NA - NA (Outside of MSA)  
 State: 18 - INDIANA  
 County: 009 - BLACKFORD COUNTY  
 Tract Code: 9752.00

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Income Information

Tract Income Level	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	


### Census Population Information

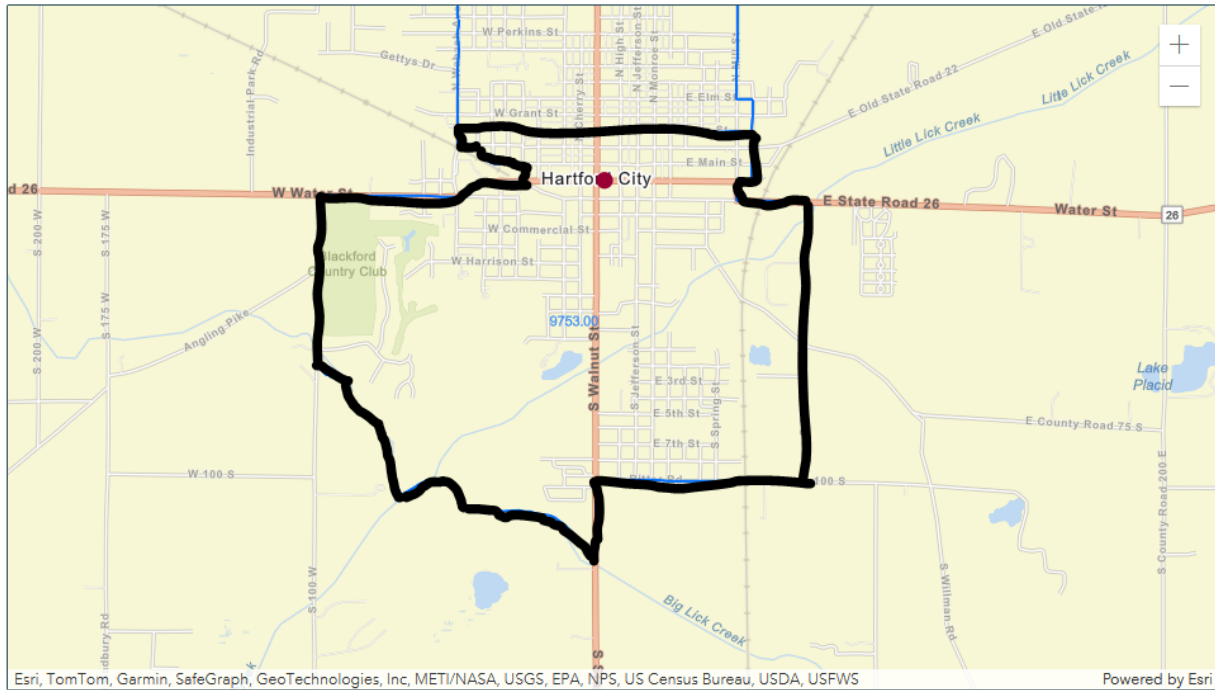
Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	

# Hartford City Downtown

 FFIEC Geocoding/Mapping System -- 2025



● Matched Address: 222 W Washington St, Hartford City, Indiana, 47348  
 MSA: NA - NA (Outside of MSA) || State: 18 - INDIANA || County: 009 - BLACKFORD COUNTY || Tract Code: 9753.00

● Selected Tract  
 MSA: || State: || County: || Tract Code:

## 2025 FFIEC Geocode Census Report

Matched Address: 222 W Washington St, Hartford City, Indiana, 47348  
 MSA: NA - NA (Outside of MSA)  
 State: 18 - INDIANA  
 County: 009 - BLACKFORD COUNTY  
 Tract Code: 9753.00

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSAMD/non-MSAMD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Population Information

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	


### Census Income Information

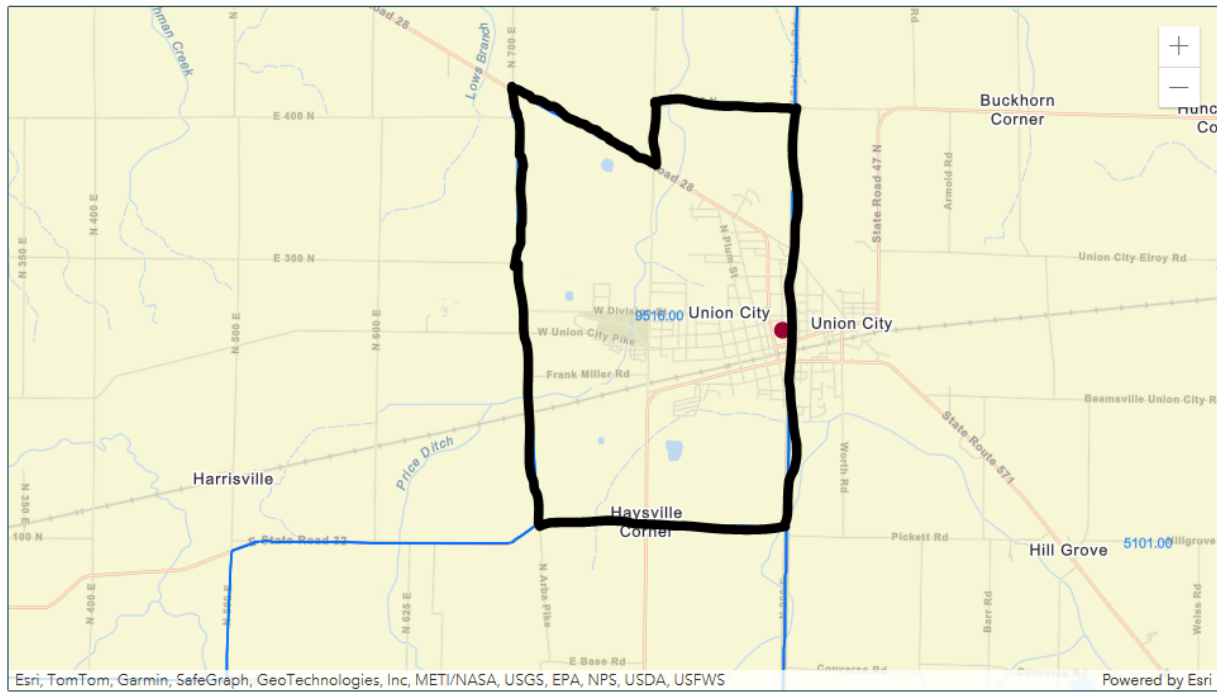
Tract Income Level	
2020 MSAMD/statewide non-MSAMD Median Family Income	
2025 FFIEC Estimated MSAMD/non-MSAMD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	


# Union City

 FFIEC Geocoding/Mapping System -- 2025



● Matched Address: 200 W Oak St, Union City, Indiana, 47390  
MSA: NA - NA (Outside of MSA) || State: 18 - INDIANA || County: 135 - RANDOLPH COUNTY || Tract Code: 9516.00

● Selected Tract  
MSA: || State: || County: || Tract Code:

 2025 FFIEC Geocode Census Report

Matched Address: 200 W Oak St, Union City, Indiana, 47390  
MSA: NA - NA (Outside of MSA)  
State: 18 - INDIANA  
County: 135 - RANDOLPH COUNTY  
Tract Code: 9516.00

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Population Information

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

### Census Income Information

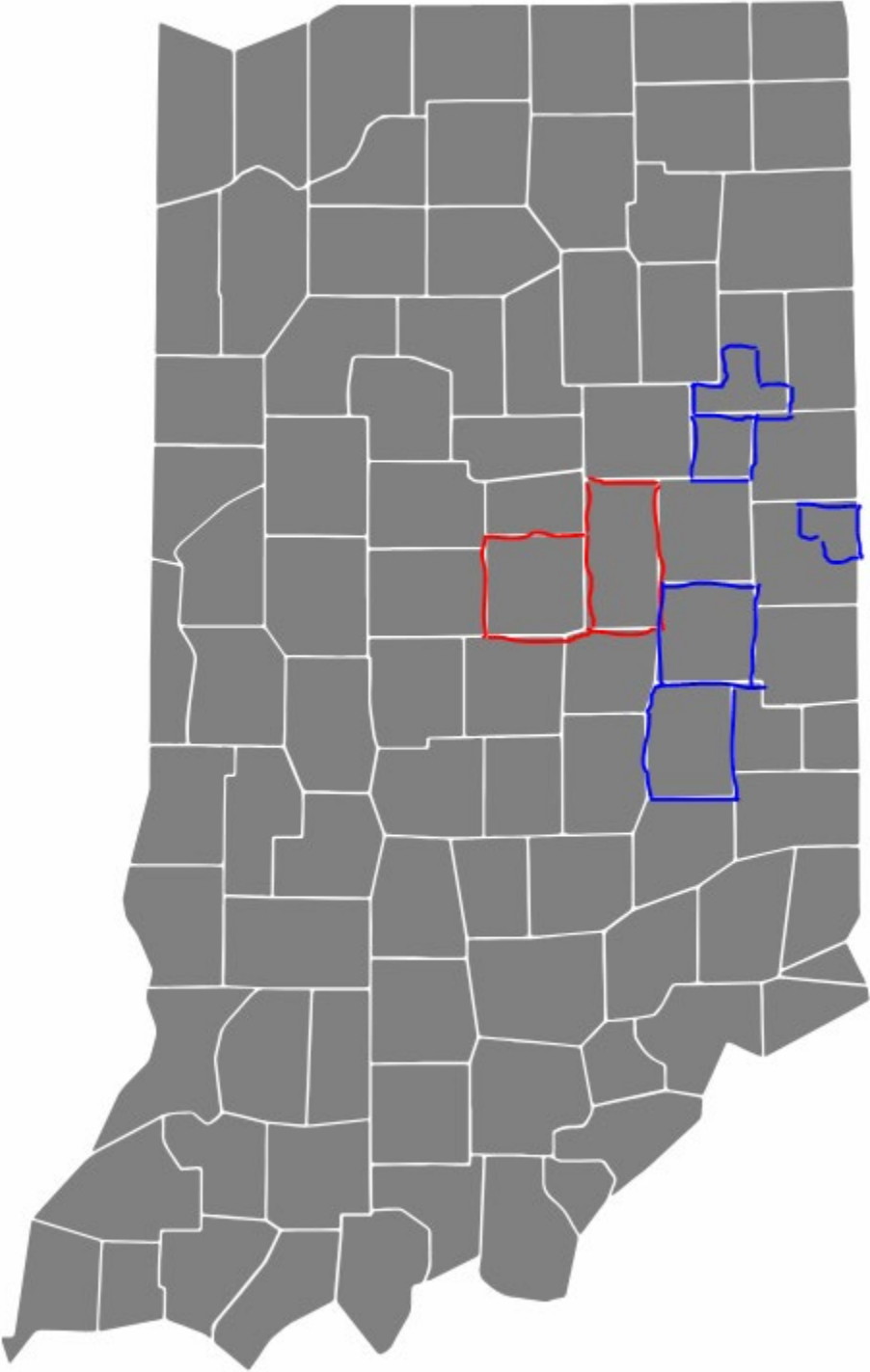
Tract Income Level	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	



Assessment Areas Map



- Areas outlined in red are the MSA Assessment Area.
- Areas outlined in blue are the Non-MSA Assessment Area.

## **CRA Assessment Area – March 1, 2025**

### Non-MSA Assessment Area

- **Henry County** – Branch locations in New Castle\* and Knightstown
- **Blackford County** – Branch location in Hartford City
- **Rush County** – Branch location in Rushville
- **Randolph County** – Blocks 9514 and 9516 – Branch location in Union City
- **Wells County** – Block 407

### MSA Assessment Area

#### **Indianapolis – Carmel-Anderson, IN MSA, Hamilton/Madison County**

- Branch location in Pendleton
- Branch location in Carmel
- Branch location in Fishers

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**\*Main Office location.**

March 2025

Citizens State Bank  
List of Services Offered & Alternative Systems of Delivery for Retail Banking

**Consumer**

- Personal Checking Accounts
- Simple Statement Savings
- Christmas Club
- Health Savings Account
- Money Market Savings
- Safety Deposit Box
- Roth IRA (Individual Retirement Account)
- Traditional IRA (Individual Retirement Account)
- Education IRA (Coverdell Education Savings Account)
- Certificate of Deposit
- Direct Deposit
- Balance Plus
- Automatic Funds Transfer
- Overdraft Privilege
- Overdraft Protections (SWEEPS)
- ATM Card
- Visa Check (Debit) Card
- Visa Credit Card
- E-Services
  - Online Banking
  - Bill Pay
  - P to P
  - Telebanking
  - Mobile Banking
    - Remote Check Capture
- Installment Loans
- Mortgage Loans
- Home Equity Line of Credit

**Business**

- Business Checking Accounts
- Business Savings
- Money Market Plus
- Safety Deposit Box
- Online Cash Management
- Remote Check Deposit
- Merchant Card Processing
- Online Banking
- Online Bill Pay



- Positive Pay
- Commercial Loans
- Agricultural Lending

**March 2025**

**Citizens State Bank CRA File  
Branch Opening and Closing in 2022 - 2024**

**Openings:**

No New Openings

**Closings:**

Closing Date: July 15, 2022

Dunkirk Branch

714 N Main St

Dunkirk, IN 47336

Blackford County

Tract Code: 9754.00

Indiana Department of Financial Institutions – notified March 7, 2022 – acknowledgement from DFI received March 9, 2022

FDIC – notified March 11, 2022 – acknowledgement from FDIC received March 22, 2022

Closing Date: July 15, 2022

Montpelier Branch

110 S Main St

Montpelier, IN 47359

Blackford County

Tract Code: 9751.00

Indiana Department of Financial Institutions – notified March 7, 2022 – acknowledgement from DFI received March 9, 2022

FDIC – notified March 11, 2022 – acknowledgement from FDIC received March 22, 2022

**March 2025**  
**Citizens State Bank CRA Public File**  
**Record of Public Inquiries or Comments**

Calendar year 2014 – no public inquiries  
Calendar year 2015 – no public inquiries  
Calendar year 2016 – no public inquiries  
Calendar year 2017 – no public inquiries  
Calendar year 2018 – no public inquiries  
Calendar year 2019 – no public inquiries  
Calendar year 2020 – no public inquiries  
Calendar year 2021 – no public inquiries  
Calendar year 2022 – no public inquiries  
Calendar year 2023 – no public inquiries  
Calendar year 2024 – no public inquiries

## HMDA Data Availability

If a customer wishes to view our latest HMDA data on residential mortgage lending – it is now available on-line at the Consumer financial Protection Bureau’s website:

[www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)

**Citizens State Bank of New Castle  
Loan-To-Deposit Ratio 2024**

- March 31, 2024 – 65.54%
- June 30, 2024 – 67.06%
- September 30, 2024 – 68.08%
- December 31, 2024 – 65.38%