



## **PUBLIC DISCLOSURE**

June 24, 2024

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

United Trust Bank  
Charter Number: 716310

12330 South Harlem Avenue  
Palos Heights, IL 60463-1501

Office of the Comptroller of the Currency

2001 Butterfield Road  
Suite 400  
Downers Grove, IL 60515

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

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Needs to Improve**.

The Lending Test is rated: **Needs to Improve**.

The major factors that support this rating include:

- A substantial majority of the bank's loans are outside its assessment area (AA).
- The bank's borrower distribution is poor.
- The bank's home mortgage lending reflects reasonable distribution of loans to different geographies throughout the AA.
- The bank's quarterly average loan-to-deposit (LTD) ratio is reasonable.
- The bank did not receive any CRA-related complaints during the evaluation period.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is **reasonable**.

During the evaluation period, the bank's quarterly average LTD ratio was 96.9 percent and ranged from 66 to 132.3 percent. The quarterly average LTD ratio increased each year. The bank ranks 10<sup>th</sup> out of 21 banks in their AA. The banks we compared to were those located in Cook and Will counties with \$90 - \$400 million in assets. These banks had an average LTD ratio of 79.6 percent over the same period, with a range from 27.3 to 117 percent.

## Lending in Assessment Area

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

The bank originated and purchased **2.5** percent of its total loans inside the bank's AA during the evaluation period. A majority of the bank's loans are originated outside of the AA due to their strategy of having loan production offices across multiple states as well as a broker relationship in Georgia. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1	2.5	39	97.5	40	215,975	0.93	22,977,429	99.07	23,193,404
<b>Total</b>	<b>1</b>	<b>2.5</b>	<b>39</b>	<b>97.5</b>	<b>40</b>	<b>215,975</b>	<b>0.93</b>	<b>22,977,429</b>	<b>99.07</b>	<b>23,193,404</b>

## Description of Institution

United Trust Bank (UTB) is a \$163 million federally chartered savings bank, wholly owned by United Bancorp, Inc. The bank does not have any other affiliates. UTB operates one branch from its sole office located in Palos Heights, Illinois, an upper-income census tract. No merger or acquisition activity occurred during the evaluation period. UTB operated under an enforcement action throughout the evaluation period to improve weaknesses in financial performance that were inhibiting the bank's viability and consequently, its ability to meet the credit needs of its AA. As a result, the bank's immediate strategic focuses included growing the mortgage banking operation and cultivating lending relationships through brokerage activity.

UTB's mortgage banking activity is derived from five loan production offices, referred to as mortgage branches, in four states: Florida (2), Illinois (1), Ohio (1), and Tennessee (1). The mortgage branches serve the entire United States and primarily receive lending leads through various lead-generating companies. While the loans generated from these offices are closed in the bank's name, UTB does not underwrite or make the credit decisions on these non-delegated transactions which are sold on the secondary market.

The bank offers traditional loan and deposit products, focusing on residential real estate loans. The loan portfolio, as of December 31, 2022, was \$107 million, or 80.8 percent of total assets. Residential real estate mortgages make up 86 percent of the loan portfolio. Tier 1 capital totaled \$12.2 million.

The last CRA performance evaluation dated November 18, 2019, was assigned a "Satisfactory" rating.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

For the performance evaluation, we reviewed select loan data from January 1, 2020, through December 31, 2022. We performed Small Bank CRA evaluation procedures for the bank's AA, which consists of all of Cook and Will counties. These counties are part of the Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area (MSA).

We determined through review of new originations report and discussions with management that home mortgage loans were the primary lending product by number of loans and dollar volume of loans originated during the evaluation period. We sampled 20 loans for each analysis period and replaced

loans outside the AA with those located in the AA to complete the geographic and borrower distribution analyses.

Due to changes between the 2015 U.S Census American Community Survey (ACS) and the 2020 U.S. Census, we performed separate analyses for 2020-2021 and 2022 to evaluate geographic distribution and borrower income criteria. The number of census tracts in the AA changed from 1,471 in 2020-2021, to 1,504 in 2022. Performance in Tables O and P of Appendix C reflect data from both analysis periods.

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

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA are evaluated as a single AA.

### **Ratings**

The bank's overall rating is based on the state of Illinois state rating. The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination for a list of AAs.

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

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

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

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

## State Rating

### State of Illinois

**CRA rating for the State of Illinois: Needs to Improve.**

**The Lending Test is rated: Needs to Improve.**

The major factors that support this rating include:

- The bank's borrower distribution is poor.
- The bank's home mortgage lending reflects reasonable distribution of loans to different geographies throughout the AA.
- The bank did not receive any CRA-related complaints during the evaluation period.

### Description of Institution's Operations in Illinois

United Trust Bank operates one branch in the state of Illinois. The main office operates as the main branch and includes a stand-alone drive-thru ATM located in Palos Heights, IL, an upper-income geography. The main branch offers traditional banking hours with drive-up services Monday through Thursday, extended hours on Friday and limited hours on Saturday.

Competition among financial institutions in the bank's AA is very strong. United Trust Bank competes with several well-established large and midsize regional banks with high deposit market shares. According to the Federal Deposit Insurance Corporation (FDIC) Market Share Report, as of June 30, 2022, UTB has approximately 0.02 percent of deposit market share, ranking 90th out of 111 depository institutions in the market. UTB's competitors include JP Morgan Chase (23.73 percent), BMO Harris (16.22 percent), and Bank of America (11.94 percent) with a combined market share of 51.89 percent.

Loan competition in the AA is strong. Based on 2022 HMDA aggregate data, 699 reporting institutions originated 142,935 mortgage loans, totaling \$47.4 billion in the AA. This lending activity demonstrates a high level of competition and demand for home lending in the AA. The largest competitors in the AA are Guaranteed Rate, JP Morgan Chase, US Bank, Huntington National, and Rocket Mortgage.

For 2022, the median housing value of owner-occupied housing units for the Cook and Will County AA was \$283,180. The median gross rent per month in the AA is \$1,229. Based on the information in table A below, the median family income is \$92,622. The percentage of families living below the poverty level is 9.4 percent.

Based on data from the U.S. Bureau of Labor Statistics, the annual unemployment rate for Cook County was 10.6 percent in 2020, 7.0 percent in 2021, and 4.9 percent in 2022. 2020 and 2021 were higher than state and national unemployment rates while 2022 was more consistent with the state rates but still higher than the national rates. According to the same data, the annual unemployment rate for Will County was 9.1 percent in 2020, 5.7 percent in 2021, and 4.5 percent in 2022, which were consistent with the state unemployment rates and higher than the national unemployment rates. The highest

unemployment rate was 19.7 percent in April 2020 in Cook County (18.4 in Will County), which was the start of the pandemic. Major employers in the AA included: Advocate Health, Chicago Public Schools, Northwestern Memorial Care, The University of Chicago, Amazon, and Plainfield School District.

Examiners utilized a community contact from a community development corporation that builds affordable, single-family homes for low-income families throughout Cook and Will counties. The contact stated that Will County is a strong market, with house prices increasing every year, but homes in the City of Chicago are older and need updating. A primary impediment to borrowing for acquiring and renovating homes is the appraisal gap. Homes on the South and West sides often do not appraise for enough to support a loan for the costs involved. On the south side of Chicago, which typically are low-to moderate-income (LMI) neighborhoods, a key need is banks willing to find ways to overcome the appraisal gap. The contact also stated that their organization is taking steps to increase bank involvement with its eight member banks in the Chicago area by acquainting them with the Community Reinvestment Act.

**Cook and Will County AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cook and Will County AA 2020-2021</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)	1,471	17.9	27.3	25.9	27.9	1.0
Population by Geography	5,920,388	13.4	27.6	28.3	30.3	0.3
Housing Units by Geography	2,415,781	13.5	26.2	27.9	31.9	0.5
Owner-Occupied Units by Geography	1,289,761	6.2	21.8	33.3	38.5	0.2
Occupied Rental Units by Geography	876,838	20.6	31.7	21.8	25.0	0.8
Vacant Units by Geography	249,182	26.3	29.6	21.1	22.4	0.6
Businesses by Geography	524,905	8.3	20.4	25.5	45.1	0.7
Farms by Geography	5,873	6.2	20.0	31.8	41.8	0.2
Family Distribution by Income Level	1,355,552	26.4	16.8	18.2	38.7	0.0
Household Distribution by Income Level	2,166,599	27.9	15.6	16.9	39.6	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$242,093
			Median Gross Rent			\$1,040
			Families Below Poverty Level			12.3%

*Source: 2015 ACS and 2021 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\* The NA category consists of geographies that have not been assigned an income classification.*

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cook and Will County AA 2022</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)	1,504	15.4	25.5	28.8	29.2	1.2
Population by Geography	5,971,896	12.1	25.5	30.9	31.0	0.5
Housing Units by Geography	2,443,735	12.2	24.6	30.3	32.2	0.6
Owner-Occupied Units by Geography	1,329,060	6.4	21.4	34.9	37.1	0.3
Occupied Rental Units by Geography	894,809	18.3	28.9	25.5	26.4	1.0
Vacant Units by Geography	219,866	23.0	27.0	22.3	26.8	0.8
Businesses by Geography	691,129	7.9	19.7	28.8	43.0	0.6
Farms by Geography	7,104	7.3	20.8	32.6	38.9	0.3
Family Distribution by Income Level	1,357,781	25.8	16.8	18.5	39.0	0.0
Household Distribution by Income Level	2,223,869	27.6	15.5	16.5	40.4	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$92,622	Median Housing Value			\$283,180
			Median Gross Rent			\$1,229
			Families Below Poverty Level			9.4%
<i>Source: 2020 U.S. Census and 2022 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>						

## Scope of Evaluation in Illinois

The bank has only one AA, which received a full-scope review.

## Lending Test

The bank’s performance under the Lending Test in **Illinois** is rated **Needs to Improve**.

## Distribution of Loans by Income Level of the Geography

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

### *Home Mortgage Loans*

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

The bank’s home mortgage lending reflects reasonable distribution of loans to different income tracts throughout the AA. The bank’s performance was only near to the percent of owner-occupied housing and exceeded aggregate peer performance for both low-income and moderate-income geographies.



Examiners were unable to perform meaningful analysis for 2022 given the insufficient volume of loans made within the bank's AA.

***Lending Gap Analysis***

We did not identify any unexplained conspicuous lending gaps in the AA.

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

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

***Home Mortgage Loans***

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

The bank's borrower distribution of home mortgages is poor as they made no loans to LMI individuals during the 2020-2021 assessment period. There were an insufficient number of loans for us to review in the 2022 assessment period. A majority of the bank's lending is in non-owner-occupied rental properties. Of those sampled a majority were to businesses whose income was not evaluated as they are not a natural person.

**Responses to Complaints**

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

## **Appendix A: Scope of Examination**

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

<b>Time Period Reviewed:</b>	<b>01/01/20 to 12/31/22</b>	
<b>Bank Products Reviewed:</b>	Home mortgage	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
MMSA		
Chicago-Naperville-Elgin, IL-IN-WI MSA	Full-scope	Cook Will Counties

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	United Trust Bank
Overall Bank:	Lending Test Rating
United Trust Bank	Needs to Improve
MMSA or State:	
Illinois	Needs to Improve

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.



<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2020-2021</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
United AA	19	2,963,439	100.0	276,398	6.2	5.3	4.0	21.8	21.1	15.4	33.3	36.8	29.9	38.5	36.8	50.5	0.2	0	0.2	
<b>Total</b>	<b>19</b>	<b>2,963,439</b>	<b>100.0</b>	<b>276,398</b>	<b>6.2</b>	<b>5.3</b>	<b>4.0</b>	<b>21.8</b>	<b>21.1</b>	<b>15.4</b>	<b>33.3</b>	<b>36.8</b>	<b>29.9</b>	<b>38.5</b>	<b>36.8</b>	<b>50.5</b>	<b>0.2</b>	<b>0</b>	<b>0.2</b>	

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

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2022</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
United AA	8	1,929,000	100.0	142,935	6.4	25.0	6.2	21.4	12.5	19.7	34.9	25.0	33.4	37.1	37.5	40.4	0.3	0.0	0.3	
<b>Total</b>	<b>8</b>	<b>1,929,000</b>	<b>100.0</b>	<b>142,935</b>	<b>6.4</b>	<b>25.0</b>	<b>6.2</b>	<b>21.4</b>	<b>12.5</b>	<b>19.7</b>	<b>34.9</b>	<b>25.0</b>	<b>33.4</b>	<b>37.1</b>	<b>37.5</b>	<b>40.4</b>	<b>0.3</b>	<b>0.0</b>	<b>0.3</b>	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2020-2021</b>	
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
United AA	19	2,963,439	100.0	26.4	0.0	4.3	16.8	0.0	14.0	18.2	10.5	20.2	38.7	26.3	45.3	0.0	63.2	16.3
<b>Total</b>	<b>19</b>	<b>2,963,439</b>	<b>100.0</b>	<b>26.4</b>	<b>0.0</b>	<b>4.3</b>	<b>16.8</b>	<b>0.0</b>	<b>14.0</b>	<b>18.2</b>	<b>10.5</b>	<b>20.2</b>	<b>38.7</b>	<b>26.3</b>	<b>45.3</b>	<b>0.0</b>	<b>63.2</b>	<b>16.3</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2022</b>	
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
United AA	8	1,929,000	100.0	25.8	0.0	10.0	16.8	0.0	21.2	18.5	0.0	20.1	39.0	62.5	30.9	0.0	37.5	17.8
<b>Total</b>	<b>8</b>	<b>1,929,000</b>	<b>100.0</b>	<b>25.8</b>	<b>0.0</b>	<b>10.0</b>	<b>16.8</b>	<b>0.0</b>	<b>21.2</b>	<b>18.5</b>	<b>0.0</b>	<b>20.1</b>	<b>39.0</b>	<b>62.5</b>	<b>30.9</b>	<b>0.0</b>	<b>37.5</b>	<b>17.8</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%