



## **PUBLIC DISCLOSURE**

July 09, 2018

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

Crystal Lake Bank & Trust Company, National Association  
**Charter Number 23574**

70 North Williams Street  
Crystal Lake, IL 60014

Office of the Comptroller of the Currency

Midsized Bank Supervision  
425 South Financial Place, Suite 2700  
Chicago, IL 60605

**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 **Outstanding**.

The following table indicates the performance level of **Crystal Lake Bank & Trust Company, National Association** (CLBT) with respect to the Lending, Investment, and Service Tests:

Performance Levels	CLBT Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Based on the data in the Tables and performance context considerations discussed in this evaluation, the overall borrower distribution of loans was good.
- The bank is a leader in making CD loans. Community development (CD) loans originated were effective in addressing community credit needs and had a significantly positive impact on the bank’s lending test rating. CLBT originated a significant volume of CD loans under various programs. In addition, the bank makes extensive use of innovative and flexible loan programs to address community credit needs.
- The bank exhibits excellent responsiveness to credit and CD needs. Qualified investments were effective and responsive in helping the bank address community credit needs. The bank made a significant level of qualified investments, grants and donations to many local nonprofit community-based organizations that serve low-and moderate-income persons residing in the community.
- The bank’s branches and alternative delivery systems are readily accessible and provide meaningful financial services across the assessment area (AA).
- The bank is a leader in providing CD services. CD services were effective and responsive in helping the bank address CD needs. The bank provided a significant amount of CD services within the AA, consistent with its capacity and financial expertise.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**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 MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 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.

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**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.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

## Description of Institution

CLBT is a \$965 million intrastate financial institution headquartered in Crystal Lake, Illinois (IL). CLBT is a subsidiary of Wintrust Financial Corporation (Wintrust). The bank was chartered in 1997 and currently has seven offices and eight ATMs. CLBT did not have any merger or acquisition activity during this evaluation period. The bank closed one deposit-taking ATM in 2017 due to low activity and close proximity to a branch location that has a deposit-taking ATM.

Wintrust is a financial services holding company based in Rosemont, IL, with total assets of approximately \$30 billion. Wintrust's footprint is centered in the Chicago metropolitan area extending into southern Wisconsin and northwest Indiana. Wintrust's operations consist of three primary segments: community banking; specialty financing; and wealth management. Under community banking, Wintrust has 15 wholly-owned-banking subsidiaries and operates a national mortgage operation to originate and sell residential mortgages into the secondary market. This nation-wide mortgage operation (Wintrust Mortgage) is conducted through a division of one of its banking subsidiaries. The community banking group accounts for 81.7 percent of Wintrust's total assets and operates 157 banking locations. Specialty finance services include commercial insurance premium financing First Insurance Funding (FIFCO), lease financing and short-term accounts receivable financing offered through other Wintrust subsidiaries. Wintrust also offers a full range of wealth management services primarily to community banking customers through three separate subsidiaries. All products and services discussed are available to CLBT customers.

As of December 31, 2017, CLBT reported total equity capital of \$95.5 million and Tier One Capital of \$91.3 million. The bank's primary business strategy is commercial lending with commercial and commercial real estate loans representing 72.0 percent of the bank's total loan portfolio. Home mortgage loans represent 6.5 percent and consumer loans are 21.5 percent of the bank's total loan portfolio. It is noted that a full array of residential mortgage products and services are readily available through referrals to the bank's affiliated full service mortgage originator. CLBT has elected not to take into consideration any affiliate lending (primarily residential mortgages) for this evaluation period. Wintrust has mortgage originators available to meet with potential applicants at any office. With commercial lending being the bank's primary business strategy our review of the bank's lending performance weighted small business lending performance more than home mortgage and consumer lending.

CLBT is located in McHenry County, IL. McHenry County, IL is part of the Chicago-Naperville-Arlington Heights, IL Metropolitan Division (Chicago MD.) The Chicago MD is part of the Chicago-Naperville-Elgin, IL-IN-WI MSA (Chicago MSA) and our data presentation in appendix C is reflected on the MSA level. Based on the 2010 Census effective through 2016, the bank's AA consisted of 38 of the 51 census tracts in McHenry County. McHenry County had an increase of one census tract effective in 2017, however the bank did not change its AA. There are no low- or moderate-income census tracts in the bank's AA, therefore there was not a geographical distribution of loans analysis performed for this evaluation. It is noted that aggregate lending as shown in the tables for small business lending is skewed as the data is run on a county level and the bank has delineated only 75 percent of all census tracts in McHenry County. As such, actual small business lending performance to the relative AA

demographics was given a higher weight factor than the McHenry County aggregate small business lending performance.

Federal Deposit Insurance Corporation (FDIC) deposit market share data dated June 30, 2017, for McHenry County shows CLBT had a 12 percent market share making it the third largest deposit holder of 28 financial institutions (top 11 percent). The top two financial institutions were BMO Harris, N.A. and JP Morgan Chase with a combined market share of 27 percent.

There are no known financial hardships or legal restrictions for CLBT that would negatively impact or impede CRA performance during this evaluation period. The bank was rated Outstanding at the prior CRA evaluation dated June 30, 2014.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The evaluation period for this CRA assessment was June 1, 2014, through December 31, 2017. All CD activities and transactions between those dates were taken into consideration. CLBT's performance under the lending test covers the time period January 1, 2014, through December 31, 2017. The bank's lending test performance for the years, 2014, 2015 and 2016 was evaluated on a combined basis. Due to changes in census data effective in 2017, lending performance for 2017 was evaluated separately. As stated above, the bank's primary loan category was small business lending. In addition, the bank provided sufficient loan data on consumer lending to warrant analysis. With the low volume of reported home mortgage lending we combined loan types (home purchase, home improvement, and refinancing) together making borrower home mortgage lending analysis more meaningful.

We completed a community tour and met with four local nonprofit community-based service organizations in the bank's AA. Community needs mentioned included donations to nonprofit community-based service organizations to support day-to-day operations providing basic services (health, food, shelter and vocational and financial education) to the homeless, senior citizens and disabled low-and moderate-income persons. Affordable housing was also mentioned as a critical need due to the limited supply of affordable rental units and opportunities for homeownership due to high housing costs. Critical needs relative to small businesses include more financial literacy training conducted by lenders in the community as well as easier access to capital especially for new start-up small businesses opening in the community.

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

The Chicago MSA was evaluated as a full-scope review.

### **Ratings**

The bank's overall rating was based on the area that received the full-scope review.

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

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

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

The bank's performance under the lending test is rated Outstanding. Based on full-scope reviews, CLBT's overall lending test performance in the Chicago MSA was excellent.

#### Lending Activity

Based on the data in Table 1 Lending Volume and Table 1 Other in appendix C, along with the bank's deposit, home mortgage and business lending market share data, CLBT originated a significant volume of loans in the AA relative to its capacity and business strategy.

- The proportion of small business loans was greater than the proportion of bank deposits for McHenry County, IL. FDIC deposit market share data dated June 30, 2017, for McHenry County shows CLBT had a 12.0 percent market share and ranked third out of 28 financial institutions (top 11 percent.) For small business lending, CLBT was ranked fifth out of 87 small business lenders operating in McHenry County, or top 6 percent. The top four small business market share competitors for the county were predominately small business credit card lenders with a combined total market share of 67.3 percent and an average loan size of \$9 thousand. CLBT had an average loan size of \$60 thousand.
- The bank's volume of CD lending was significant in the AA and represented 10.4 percent of Tier One Capital. The bank is a leader in making CD loans. The bank exhibits a good record of serving the credit needs of the community. These CD loans met the community credit needs identified for the AA with the vast majority having a primary purpose of economic development or made to community-based service organizations.
- It was also noted that the bank's affiliated mortgage lending financial institution was listed in the top five of mortgage lenders for market share in the AA for home purchase and the top ten for home refinance lending in the AA.

#### Lending Gap Analysis

We performed a lending gap analysis that included a review of reports and maps showing the distribution of branches, applications and loans. We did not identify any unexplained conspicuous lending gaps in the bank's AA.

#### Inside/Outside Ratio

Overall CLBT made a high percentage (62 percent) of its loans inside the AA during the evaluation period. Forty percent of residential mortgage lending was originated within the AA, 77 percent of consumer lending was inside the AA, and 6 percent of small business lending was within the AA. The percentage of small business lending inside the AA was diluted due to the fact that approximately 99 percent of small business loans were FIFCO loans purchased

by CLBT from an affiliate (described above under Description of the Institution). Excluding these purchased loans, bank reports reflect over 60 percent of the small business loans originated inside the bank's AA.

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

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

Based on the data in Tables 8, 9, and 10 in appendix C the bank's overall borrower distribution of the bank's home mortgage loan originations and purchases was excellent.

- For 2014-2016 combined, the distribution of the bank's home mortgage loans to low- and moderate-income borrowers was excellent. The proportion of loans to low-and moderate-income borrowers was significantly stronger than the proportion of low-and moderate-income families residing in the AA and significantly stronger than the aggregate distribution of loans to those borrowers in the AA.
- The volume of 2017 home mortgage lending for CLBT was insufficient to perform a meaningful distribution analysis.

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

Based on the data in Table 11 in appendix C, the bank's overall distribution of small business loan originations and purchases for this evaluation period was good.

- For 2014-2016 combined, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans the bank made was consistent with the proportion of small businesses operating in the AA.
- Small business aggregate lending was significantly stronger than the aggregate distribution of business loans to small businesses.
- The bank's small business lending in 2017 was consistent with 2014, 2015, and 2016.

### ***Consumer Loans***

Based on Table 13 in appendix C, the bank's overall borrower distribution of consumer loan originations and purchases for this evaluation period was excellent.

- For 2014 through 2016, the bank's distribution of consumer lending to low-and moderate-income borrowers was excellent. The percentage of consumer loans made to both low-and moderate-income borrowers was significantly stronger than the percentage of both low-and moderate-income households residing in the AA.
- For 2017, the bank's consumer lending was consistent with consumer lending in 2014 through 2016.

## Community Development Lending

Based on Table 1 Lending Volume in appendix C, CD lending was excellent. CD lending had a significantly positive impact on the lending test conclusion in the Chicago MSA.

- The bank is a leader in making CD loans. CLBT's level of CD lending in the AA was excellent. The bank made 24 qualified CD loans in the AA totaling \$9.5 million representing 10.4 percent of Tier 1 Capital. CD loans originated during the evaluation period included: \$5.0 million with the primary purpose of economic development; \$2.5 million for affordable housing and \$2.0 million towards community-based services, all identified as being community credit needs in the AA.
- Due to the excellent responsiveness of meeting the CD credit needs of the AA, the bank received positive consideration for CD qualified loans made within the broader statewide or regional area. These loans totaled an additional \$10.6 million for qualified CD purposes. The CD loans outside of the AA were primarily (\$7 million) for economic development. The remaining CD loans were for the purpose of revitalization and stabilization of low- and moderate-income areas and for affordable housing for low- and moderate-income persons.

Examples of CD loans in the AA included:

- An annual renewal of a working capital line of credit was made to a nonprofit economic development agency in McHenry County. The nonprofit works closely with a local Small Business Development Corporation to aid new businesses in the area. Services included various workforce/job training initiatives. Providing resources to assist new start-up and small businesses in the area was identified as a critical community credit need. The renewal provides continuity of funding for the organization to continue its business operations.
- An annual renewal of a working capital line of credit was made to a local nonprofit community-based service organization. The nonprofit provided transitional housing and support services for low-and moderate-income persons including homeless and single females and their children until they reach self-sufficiency. Community-based CD services was identified as another critical need in the AA.

## Product Innovation and Flexibility

CLBT's innovative and flexible loan programs were effective in helping the bank address community credit needs. The bank originated a significant number of these types of loans during the evaluation period. The bank makes extensive use of innovative or flexible lending to meet the credit needs of the community.

- Wintrust established a specialty Small Business Administration (SBA) lending department within one its financial subsidiaries. These specialized lending officers were shared with CLBT and other lending affiliates. The SBA products offered include: 504, 7A and Express Loan Programs. In addition to the SBA loan products, CLBT offers in-house Small Business Micro Loans including Small Business Overdraft Protection, Easy Access Line of Credit and

Easy Access Installment Loans. During the evaluation period, Crystal Lake originated and/or renewed 1,030 of these types of loans, totaling \$34.4 million. These loan products were tailored to effectively meet the credit needs of small businesses (annual revenues of \$1 million or less).

- The Everyday Loan programs were targeted specifically for low- and moderate-income individuals residing in the bank's AA and included two flexible small dollar fixed-rate consumer loan programs with maximum loan amounts of \$2,500 and rates lower than most credit cards and other fast cash loans. The Everyday Small Dollar Loan product is an unsecured consumer installment loan for any personal purpose. The Certificate of Deposit Secured Loan product is for individuals looking to establish or improve their credit reporting data. During the evaluation period, CLBT originated and/or renewed 77 loans totaling \$123,736. These loan products were tailored to effectively meet the credit needs of low- and- moderate-income persons.
- A full array of home mortgage products was available through the mortgage origination operations of the bank's financial affiliate, Wintrust Mortgage. To meet the needs of low- and-moderate-income individuals residing in the AA, Federal Housing Administration (FHA), Veteran Administration (VA) and United States Department of Agriculture (USDA) mortgage loans were offered along with other conventional home mortgage loans. In addition, special first time home buyer programs, down payment assistance programs and other lending programs offered by Illinois Housing Development Authority (IHDA) and Federal Home Loan Bank of Chicago were also available to meet the affordable housing needs of low- and moderate-income persons. Wintrust Mortgage originated 126 IHDA loans totaling \$17.5 million directly benefitting low-and moderate-income persons in the bank's AA.
- In 2017, an innovative program to provide down payment, closing costs or escrow assistance to low- or moderate-income borrowers was implemented at CLBT (Wintrust Community Bank Down Payment Program). For the 2017 program year, the maximum grant was \$2,000 per household. Funds were made available through multiple HUD-approved non-profit affordable housing agencies across the Wintrust footprint including the CLBT AA. The assistance provided was in the form of a grant paid on behalf of the borrower at the time the borrower closed on a first mortgage for a home purchase located in the bank's AA. The grant was fully forgiven at closing. The innovative segment of this grant program was that Wintrust did not mandate the borrower use a Wintrust Mortgage home mortgage loan product to qualify for the grant. A local nonprofit community-based affordable housing organization administered the program for Crystal Lake.

## **INVESTMENT TEST**

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

The bank's performance under the investment test is rated Outstanding. Based on full-scope reviews, the bank's performance in the Chicago MSA was excellent.

Based on the data in Table 14 in appendix C and the following performance context considerations, the bank's level of qualified CD investments, contributions and grants was excellent.

- CD investment opportunities were somewhat limited as the bank's AA was primarily affluent with all of its census tracts being middle- or upper-income tracts. It was also noted that the market for qualified CD investments was very competitive and crowded with a good number of financial institutions vying for all qualified investments.
- The bank has an excellent level of qualified investments. Over the CD evaluation period of 42 months, the bank's dollar amount of the investments in the Chicago MSA represented 8.5 percent of the bank's Tier One Capital. CLBT had an additional three investments representing 0.4 percent of Tier One Capital in unfunded commitments.
- CLBT exhibited an excellent level of responsiveness to the CD needs in the AA. During the evaluation period, current CD investments were made primarily to nonprofit organizations whose primary focus met one of the regulatory definitions of CD. Specifically, investments totaling \$3.7 million were made to nonprofit CD based organizations involved in revitalization and stabilization projects; \$3.4 million towards economic development programs; \$426,237 towards affordable housing initiatives; and, \$295,231 for community-based services. These services included providing health care and educational opportunities, as well as job and financial training to low- and moderate-income persons.

## **SERVICE TEST**

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

The bank's performance under the service test is rated Outstanding. Based on full-scope reviews, the bank's performance in the Chicago MSA was excellent.

### **Retail Banking Services**

Based on the data in Table 15 in appendix C, the bank's delivery systems and the following performance context considerations the bank's retail service performance was excellent.

- CLBT's delivery systems were readily accessible throughout the AA. The bank operated seven branch offices in the AA, one drive-up facility and eight ATMs. There were no low- or moderate-income geographies in the banks AA. All of the CLBT offices and drive-up facilities were located in upper-income census tracts with the exception of the two offices located in middle-income census tracts.
- The bank made good use of alternative delivery systems through debit cards and ATMs, telephone and consumer online banking, electronic bill pay, and mobile banking options. The bank had seven ATMs in the AA and all were deposit-taking ATMs. These systems provide additional delivery availability and access to banking services to both retail and business customers.

- CLBT's record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly to low- and moderate-income individuals. A drive-up facility in Crystal Lake was closed earlier in 2017 due to the close proximity of a full service branch.
- The bank's hours and services did not vary in a way that inconvenienced certain portions of the AA, particularly low- and moderate-income individuals. CLBT maintains standard business hours and offers traditional banking products, mortgage, consumer and small business lending and services at all branch locations in the AA.

## **Community Development Services**

Based on the level of CD services and the following performance context considerations, the bank's provision of CD services was excellent.

- CLBT provided an excellent level of CD services, which had a positive impact on the service test rating. CLBT was a leader in providing CD services that were highly responsive to community needs in the AA. Of the 27 different organizations that bank employees, senior management, and members of the board of directors participated with, 40 represented leadership roles within those different organizations for a total of 2,451 hours. The bank worked with three different affordable housing advocacy groups and 20 CD service organizations that brought educational and health care, as well as, affordable housing options to low- and moderate-income persons and families throughout the AA. The bank also worked with four economic development organizations in the AA.

Notable examples include:

- During the evaluation period, 15 staff members provided 352 hours to a local nonprofit community-based service organization whose mission was to provide human service programs to low-and moderate-income persons residing in the community. Staff members provided financial expertise by serving on the board, allocation, finance and audit committees. The organization provided much needed free meals, health and counseling services, housing to the homeless, vocational training and emergency funds to low- and moderate-income persons that included the elderly, veterans and at-risk families in the community.
- Four staff members provided 28 training sessions for a total of 38 hours of financial literacy education to low-and moderate-income individuals and small businesses. The bank uses several FDIC Financial Education Money Smart Programs noted for their comprehensive financial education curriculum designed to help low- and moderate- income persons to enhance financial skills. Financial education fosters financial stability for individuals, families and entire communities. Small business sessions provide a practical introduction to topics such as starting and managing a business.
- Two staff members provided 43 hours to a nonprofit community based economic development corporation by participating as a board member and on the committee of economic development. Staff members provided financial expertise and other services needed in order to attract new businesses and jobs to the area.

- During the evaluation period, a staff member provided 156 hours to a local food bank by serving on the finance and budget committees. The nonprofit community-based service organization provides food to low- and moderate-income families who are homeless, unemployed or underemployed, working poor, disabled, elderly and children living in the community.
- One staff member provided 72 hours of financial expertise by serving as a commissioner for a local nonprofit community-based affordable housing organization. Financial expertise included assisting with budgets and financial reporting.

## Appendix A: Scope of Examination

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 metropolitan and nonmetropolitan areas 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>	Lending Test (excludes CD Loans): 01/01/2014 to 12/31/2017 Investment and Service Tests and CD Loans: 06/01/2014 to 12/31/2017	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Crystal Lake Bank & Trust, NA (CLBT) Crystal Lake, Illinois	HMDA Small Business Consumer	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Chicago MSA	Full Scope	

## Appendix B: Community Profiles for Full-Scope Areas

### Chicago MSA

Demographic Information for Full-Scope Area: Chicago MSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	38	0.00	0.00	39.47	60.53	0.00
Population by Geography	222,356	0.00	0.00	35.16	64.84	0.00
Owner-Occupied Housing by Geography	66,043	0.00	0.00	36.25	63.75	0.00
Businesses by Geography	11,678	0.00	0.00	34.71	65.29	0.00
Farms by Geography	319	0.00	0.00	34.80	65.20	0.00
Family Distribution by Income Level	58,490	11.58	13.82	21.09	53.51	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	14,858	0.00	0.00	45.48	54.52	0.00
Median Family Income	= \$72,196					
FFIEC Adjusted Median Family Income for 2017	= \$74,700					
Households Below the Poverty Level	= 5%					
				Median Housing Value	= \$258,947	
				Unemployment Rate	= 4.01%	

\* The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 U.S. Census, and 2017 Federal Financial Institutions Examination Council (FFIEC) updated MFI.

CLBT's AA consists of 38 census tracts in McHenry County, IL, which is part of the Chicago-Naperville-Arlington Heights, IL MD. The AA includes 71 percent of the population and 73 percent of the 52 census tracts in McHenry County. The AA meets regulatory requirements.

CLBT's AA is part of the suburban region that lies far northwest of the City of Chicago. The population of CLBT's AA is 220,442. McHenry County, with a population of more than 309,000, is the sixth largest county in the Chicago MSA and in Illinois. The FFIEC 2017 estimated median family income (MFI) in McHenry County was \$77,500. Although none of the census tracts in the AA are low- or moderate-income geographies, according to U.S. Census data, about 8% of the people living in McHenry County live below the poverty level.

As of June 30, 2017, CLBT had a deposit market share in McHenry County of 12.01 percent, which ranked third out of 28 financial institutions gathering deposits in the county. BMO Harris Bank and JP Morgan Chase Bank held the top two market shares in McHenry County, which each were comparable to the market share of CLBT. Other banks gathering deposits in McHenry County include six large banks with operations in many states, four regional banks that are comparable in size to the combined banks owned by Wintrust and seven community banks roughly comparable in size to CLBT.

McHenry County has a combination of rural and suburban characteristics. The northern and western sections of the county retain a rural character and much more agricultural, while the southeastern sections of the county have become developed as suburban bedroom communities for the northwest suburban area of Chicago and for the City of Chicago itself. A commuter rail line, for example, links the City of Crystal Lake with downtown Chicago, a large

employment center. CLBT gathers most of its deposits from, and the census tracts in the CLBT's AA are largely in, the southeastern portion of the county.

Datausa.io reports that the economic sectors providing the greatest number of jobs in McHenry County are manufacturing, retail trade, and healthcare and social assistance. Also according to Datausa.io, McHenry County is particularly specialized in manufacturing, wholesale trade; and retail trade, which employ more people than would be expected in counties of similar size. According to the McHenry County Economic Development Corporation, the largest private-sector employers in McHenry County are Centegra Health System, with more than 5,000 employees; Follett Library Resources, Inc., with nearly 1,400 employees; and Catalent Pharma Solutions, with more than 800 employees. McHenry County has joined with two counties directly west to develop a comprehensive regional economic development plan that focuses on particular industry clusters.

CLBT's AA is predominantly affluent, with significant numbers of moderate-income households. The housing and employment markets function reasonably well for the majority of residents. Education attainment levels and incomes are high and unemployment is slightly lower than the state's rate. Relatively little subsidized or otherwise affordable housing is available in CLBT's AA. The Heartland Alliance, a Chicago-based social service agency, reports that as much as 22.6 percent of the population of McHenry County is paying more than 30 percent of their income for housing, and that the market rate for a 2-bedroom housing unit in McHenry County is significantly higher than is affordable to a person earning IL's minimum wage. According to housing market information published by the Metropolitan Planning Council, there is a need in McHenry County for a broader array of housing choices, including more affordable starter homes and more units of affordable rental housing. There is also some need for rehabilitation of lower-cost housing units that were built 50 to 60 years ago that could meet the current need for affordable housing.

These conditions give rise to needs for small business financing; programs that provide business planning and management assistance services; workforce development programs; financing for home renovations and improvements, including in conjunction with public sector support for such lending; down payment and closing cost assistance; flexible home mortgage products; debt and equity investments in affordable housing; and a variety of social services.

While qualified investments are limited, opportunities and partners for responding to the CD needs in CLBT's AA are available. They include nonprofit, municipal and county-level business development and workforce training initiatives; active SBA 504 certified development companies; a nonprofit micro lender to small businesses that serves the region; several regional nonprofit organizations that develop affordable housing; an organization engaged in financial education and housing counseling; multiple regional community development financial institutions that meet a wide range of CD financing needs in conjunction with banks; and approximately two-dozen nonprofit social service organizations.

## Appendix C: Tables of Performance Data

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### Content of Standardized 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and

purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Table 1. Lending Volume**

LENDING VOLUME													Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***								
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)									
<b>Full Review:</b>																				
Chicago MSA	100.00	29	8,336	1,000	80,597	0	0	24	9,480	1,053	98,413	100.00								
Broader Regional Area (CD Loans)								8	10,555	8	10,555									

\* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from June 01, 2014 to December 31, 2017.

\*\*\* Deposit Data as of July 11, 2018. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA <sup>*</sup>	Total Optional Loans		Small Business Real Estate Secured <sup>**</sup>		Home Equity <sup>**</sup>		Motor Vehicle <sup>**</sup>		Credit Card <sup>**</sup>		Other Secured Consumer <sup>**</sup>		% of Rated Area Deposits in MA/AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Chicago MSA	100.00	326	25,494	0	0	221	20,493	13	183	0	0	44	4,659	0.00

<sup>\*</sup> Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

<sup>\*\*</sup> The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2016.

<sup>\*\*\*</sup> Deposit Data as of July 11, 2018. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016	
Assessment Area (2016):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
Chicago MSA	48	159	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2016.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income <sup>*</sup>			
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Chicago MSA	11	100.00	0.00	0.00	0.00	0.00	36.25	18.18	63.75	81.82	0.00	0.00	36.13	63.87

<sup>\*</sup> Based on 2016 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Chicago MSA	1	100.00	0.00	0.00	0.00	0.00	36.25	0.00	63.75	100.00	0.00	0.00	37.28	62.72

\* Based on 2016 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE														Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*														
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp											
<b>Full Review:</b>																									
Chicago MSA	16	100.00	0.00	0.00	0.00	0.00	36.25	43.75	63.75	56.25	0.00	0.00	29.25	70.75											

\* Based on 2016 Peer Mortgage Data -- US and PR

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Chicago MSA	1	100.00	0.00	0.00	0.00	0.00	53.46	100.00	46.54	0.00	0.00	0.00	40.91	59.09

\* Based on 2016 Peer Mortgage Data -- US and PR

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income <sup>*</sup>								
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	Low	Mod	Mid	Upp					
<b>Full Review:</b>																			
Chicago MSA	1,000	100.00	0.00	0.00	0.00	0.00	34.71	29.40	65.29	70.60	0.00	0.90	39.68	59.42					

<sup>\*</sup> Based on 2016 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2016).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Aggregate Lending (%) by Tract Income*			
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans					
<b>Full Review:</b>															
Chicago MSA	0	0.00	0.00	0.00	0.00	0.00	34.80	0.00	65.20	0.00	0.00	1.32	76.32	22.37	

\* Based on 2016 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2016).

**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>1</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Chicago MSA	11	100.00	11.58	12.50	13.82	25.00	21.09	0.00	53.51	62.50	8.10	24.55	29.12	38.24

\* Based on 2016 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 27.3% of loans originated and purchased by BANK.

<sup>1</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>2</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Chicago MSA	1	100.00	11.58	0.00	13.82	100.00	21.09	0.00	53.51	0.00	5.96	12.84	24.31	56.88

\* Based on 2016 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>2</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*						
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>3</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp			
<b>Full Review:</b>																	
Chicago MSA	16	100.00	11.58	27.27	13.82	27.27	21.09	27.27	53.51	18.18	4.69	12.75	23.55	59.01			

\* Based on 2016 Peer Mortgage Data -- US and PR

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 31.3% of loans originated and purchased by BANK.

<sup>3</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Chicago MSA	1,000	100.00	84.45	71.00	79.30	11.50	9.20	7,877	3,291

\* Based on 2016 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.90% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ILLINOIS			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Chicago MSA	0	0.00	96.24	0.00	0.00	0.00	0.00	76	33

\* Based on 2016 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution’s Option)**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Geographic Distribution										Borrower Distribution														
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers								
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds* *	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds* *	% of BANK Loans	% of Hhlds**	% of BANK Loans							
<b>Full Review:</b>																									
Chicago MSA	326	100.00	0.00	0.00	0.00	0.00	38.18	36.81	61.82	63.19	13.26	13.50	12.58	17.18	17.77	19.94	56.39	46.32							

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ILLINOIS				Evaluation Period: JUNE 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Chicago MSA	8	5,169	130	2,633	138	7,802	100.00	3	342

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings / Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS / CLOSINGS																Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Geography: ILLINOIS																			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
<b>Full Review:</b>																			
Chicago MSA	100.00	8	100.00	0.00	0.00	25.00	75.00	0	0	0	0	0	0	0.00	0.00	35.16	64.84		

