

## **PUBLIC DISCLOSURE**

December 30, 2019

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Okawville Charter Number 11754

> 203 Walnut St Okawville, IL 62271

Office of the Comptroller of the Currency 500 North Broadway, Suite 1700 St. Louis, MO 63102

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.

# **Table of Contents**

OVERALL CRA RATING	1
SCOPE OF THE EVALUATION	3
PE OF THE EVALUATION	5
STATE RATING	<del>(</del>
STATE OF ILLINOIS	<i>6</i>
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: SUMMARY OF MMSA AND STATE RATINGS	B-1
APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS	C-1
APPENDIX D: TABLES OF PERFORMANCE DATA	D-1

## **Overall CRA Rating**

Institution's CRA Rating: This institution is rated Outstanding.

The Lending Test is rated: Outstanding.

Note: The LTD ratio was calculated and evaluated on a bank-wide basis.

First National Bank of Okawville (FNBO or bank), demonstrates an outstanding record in meeting the needs of its community. The major factors that support this rating include:

- FNBO's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and credit needs of the assessment area (AA).
- A majority of the bank's consumer and small farm loans are inside its AA.
- The bank's distribution to individuals of different income levels and farms of different sizes is excellent throughout its AA.
- There were no complaints with respect to the bank's CRA performance during the evaluation period.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of its AA, the bank's LTD ratio is reasonable. When assessing the reasonableness of the bank's LTD ratio, we considered the high level of competition in the AA, the bank's strategic focus on smaller dollar consumer lending, as well as demand for the bank's other primary product, small farm loans. The bank competes with seven other financial institutions that have branches within Washington county, several of which are included in the table below. Most of the bank's competitors also focus their lending efforts on real estate loans, which generally are larger dollar and contribute to a higher LTD ratio. Competition for small farm loans continues to be high, as demand remains soft. The bank's main competitor for small farms loans, The Old Exchange National Bank of Okawville, is located right across the street.

The bank's LTD ratio averaged 45.1 percent over the 18 quarters since the last CRA evaluation, with a low of 40.7 percent to a high of 48.8 percent. This is comparable to the ratios of five other banks similar in size, geographic location, and product offerings, whose quarterly averages ranged from a low of 58.1 percent to a high of 85 percent, with a combined average of 72.7 percent for the same period.

Institution	Total Assets (\$000s) as of 12/31/2018	Average Quarterly LTD Ratio
Nashville Savings Bank	\$61,805	85.0%
Oakdale State Bank	\$21,142	80.0%
The Farmers and Merchants National Bank of Nashville	\$174,514	71.3%
Community Trust Bank	\$86,289	68.9%
The Old Exchange National Bank of Okawville	\$70,866	58.1%
The First National Bank of Okawville	\$66,034	45.1%
Source: Quarterly Call Reports from September 30, 2014 to December 31, 2	2018	

#### **Lending in Assessment Area**

A majority of the bank's loans are inside its AA.

The bank originated 72.5 percent of the total number and 69.7 percent of the total dollar volume of loans inside its AA during the evaluation period. This ratio is a bank-wide calculation, and not calculated by individual rating area or AA.

		Lending	Inside a	nd Outsi	de of the A	ssessment	Area			
		Number o	f Loans			Dollar	Amount of	f Loans \$(	000s)	
Loan Category	Ins	ide	Out	side	Total	Insi	de	Outs	side	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Farm										
2016	4	80.0	1	20.0	5	335	77.0	100	23.0	435
2017	6	75.0	2	25.0	8	414	60.1	275	39.9	689
2018	4	57.1	3	42.9	7	334	52.7	300	47.3	634
Subtotal	14	70.0	6	30.0	20	1,083	61.6	675	38.4	1,758
Consumer										
2016	6	66.7	3	33.3	9	68	73.9	24	26.1	92
2017	3	60.0	2	40.0	5	14	50.0	14	50.0	28
2018	6	100.0	0	0.0	6	478	100.0	0	0.0	478
Subtotal	15	75.0	5	25.0	20	560	93.6	38	6.4	598
Total	29	72.5	11	27.5	40	1,643	69.7	713	30.3	2,356

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data

Due to rounding, totals may not equal 100.0

## **Description of Institution**

FNBO is an intrastate bank headquartered in Okawville, Illinois, a rural agricultural community. The office is located in a middle-income census tract (CT 9502); however, prior to 2017, the CT was designated as upper-income. The bank offers traditional services and loan products normally associated with a community bank. FNBO has one automated teller machine (ATM) located onsite at the bank. The ATM is cash dispensing only. The bank does not have any other branches at this time. There have been no changes in the corporate structure, including merger or acquisition activities, since the last CRA examination.

As of December 31, 2018, the bank had total assets of \$66 million, total deposits of \$58.5 million, and tier one capital of \$7.4 million. Net loans and leases outstanding totaled \$24.7 million, representing 37.4 percent of total assets. Loan portfolio composition as of December 31, 2018, includes the following:

1	oan Portfolio Summary by Loan Pro December 31, 2018	oduct
Loan Type	Dollars (000)	Percentage of Loan Portfolio
Agricultural Loans	\$13,120	53%
Residential Loans	\$6,249	25%
Commercial Loans	\$4,354	18%
Consumer Loans	\$926	4%
Other Loans & Leases	\$196	<1%
<b>Total Loans</b>	\$24,845	100%

There are no legal, financial, or other factors impeding FNBO's ability to help meet the credit needs of its AA. The bank's last CRA performance evaluation was on October 20, 2014. Utilizing Small Bank CRA examination procedures, the OCC concluded that the bank's performance was "Satisfactory."

## **Scope of the Evaluation**

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

This performance evaluation is an assessment of the bank's record of meeting the credit needs of the communities in which it operates. We evaluated FNBO using the Small Bank performance criteria, which includes a Lending Test. The Lending Test evaluates the bank's record of helping to meet the credit needs of its AA through its lending activities.

FNBO's AA consists of one CT (CT 9502) located in northwest Washington County, Illinois. The AA received a full-scope review. The scope of the CRA evaluation period is October 21, 2014 through December 31, 2018. We based our conclusions regarding the bank's lending performance on loans to consumers and small farms, the bank's primary loan products.

To evaluate FNBO's lending performance, we selected a random sample of consumer and farm loans originated in 2016, 2017, and 2018 (20 consumer and 20 farm loans originated during 2016, and 20 consumer loans and 20 farm loans originated during the period of 2017-2018). After our initial sampling to analyze the bank's lending inside its AA, we only used loans made in the AA to evaluate the other Lending Test factors. Please refer to the following table for a summary of loan originations by loan type during the evaluation period:

Loan Originations by Loan Type from January 1, 2016 through December 31, 2018											
Loan Category	Dollars (000s)	% of Dollars	Number of Loans	% of Number of Loans							
Agricultural	\$17,610	64.5%	162	30.4%							
Commercial	\$4,302	15.8%	25	4.7%							
Residential	\$3,375	12.4%	35	6.6%							
Consumer	\$2,017	7.4%	311	58.4%							
<b>Total Loans</b>	\$27,305	100%	533	100%							
Source: Bank Records Januar	ry 1, 2016 – December 31, 2018	}									

We completed two separate analyses of the bank's lending performance. For the bank's 2016 lending performance, we used the comparators of demographic data from the 2010 United States (U.S.) Census. For the bank's 2017 and 2018 lending performance, we used the comparators of demographic data from the 2015 American Community Survey (ACS).

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

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

## **Ratings**

FNBO's overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from the bank's observed performance under the CRA Small Bank Lending Test, as well as related performance context information from the bank's Illinois Non-MSA. With the exception of the bank's LTD ratio (based on the bank's entire lending portfolio), all weight for performance under the CRA Small Bank Lending Test was based on the bank's lending performance in relation to its primary products - small farm and consumer loans. Agricultural loans made up the largest segment of the bank's lending activity by dollar while consumer loans made up the majority of loans by number originated.

## Discriminatory or Other Illegal Credit Practices Review

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

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

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

## **State Rating**

## **State of Illinois**

**CRA rating for the State of Illinois:** Outstanding.

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- The average LTD ratio is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of the bank's small farm and consumer loans were originated inside its AA.
- The bank's distribution of loans to individuals of different income levels and farms of different sizes is excellent throughout its AA.
- There were no complaints with respect to the bank's CRA performance during the evaluation period.

## **Description of Institution's Operations in Illinois**

Bank management has designated northwestern Washington County in southwestern Illinois as its AA. The AA is a Non-Metropolitan Statistical Area (Non-MSA) comprised of a single CT (CT 9502). The bank operates one full-service branch and onsite ATM in Okawville, Illinois, located in CT 9502. The CT was classified as upper income in 2016 but changed to middle-income in 2017-2018. There are no low-or moderate-income CTs in the bank's AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas.

FNBO's primary business focus is on small farm and consumer lending. As of June 30, 2018, eight depository institutions operate 13 offices in Washington County. Of the eight institutions, FNBO ranks fourth with 50.9 million in deposits, representing 12.5 percent of the market.

## **Community Contact**

A community contact from a not-for-profit organization that serves FNBO's AA provided insight on potential community needs. The contact stated the community would benefit from banks providing a form of pre-purchase financial counseling for lower-income borrowers to ensure there is an understanding around the type of budgeting required for larger purchases (house, car, etc...). This contact also noted their clients often face issues related to poor credit scores due to past delinquency issues and stated there are community development opportunities to provide financial education around underlying credit issues.

The contact noted that current economic conditions have improved somewhat in the last few years. She believes that local banks are actively participating in their local communities. She identified the following needs for their respective areas, including:

• Affordable housing (including first time homebuyer programs and down payment and closing assistance);

- Financial education and literacy programming in order to address the needs of the unbanked population; and
- Small business development and lending.

## **Illinois Non-MSA**

Demographic Information of the Illinois Non-MSA Assessment Area for 2016													
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #							
Geographies (Census Tracts)	1	0.0	0.0	0.0	100.0	0.0							
Population by Geography	3,795	0.0	0.0	0.0	100.0	0.0							
Housing Units by Geography	1,710	0.0	0.0	0.0	100.0	0.0							
Owner-Occupied Units by Geography	1,340	0.0	0.0	0.0	100.0	0.0							
Occupied Rental Units by Geography	275	0.0	0.0	0.0	100.0	0.0							
Vacant Units by Geography	95	0.0	0.0	0.0	100.0	0.0							
Businesses by Geography	196	0.0	0.0	0.0	100.0	0.0							
Farms by Geography	64	0.0	0.0	0.0	100.0	0.0							
Family Distribution by Income Level	1,115	9.8	16.4	22.3	51.5	0.0							
Household Distribution by Income Level	1,615	17.8	9.3	19.9	52.9	0.0							
Median Family Income Non-MSAs - IL	_	\$54,499	Median Housin	g Value		\$128,300							
			Median Gross F	Rent		\$684							
			Families Below	Poverty Level		5.2%							

Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Demographic Information of the Illinois Non-MSA Assessment Area 2017-18													
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #							
Geographies (Census Tracts)	1	0.0	0.0	100.0	0.0	0.0							
Population by Geography	3,646	0.0	0.0	100.0	0.0	0.0							
Housing Units by Geography	1,737	0.0	0.0	100.0	0.0	0.0							
Owner-Occupied Units by Geography	1,259	0.0	0.0	100.0	0.0	0.0							
Occupied Rental Units by Geography	232	0.0	0.0	100.0	0.0	0.0							
Vacant Units by Geography	246	0.0	0.0	100.0	0.0	0.0							
Businesses by Geography	174	0.0	0.0	100.0	0.0	0.0							
Farms by Geography	62	0.0	0.0	100.0	0.0	0.0							
Family Distribution by Income Level	1,010	7.7	20.7	22.2	49.4	0.0							
Household Distribution by Income Level	1,491	12.9	16.0	18.7	52.4	0.0							
Median Family Income Non-MSAs - IL	-	\$59,121	Median Housing	g Value		\$121,500							
			Median Gross R	ent		\$710							
			Families Below	Poverty Level		3.4%							

Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

According to the 2015 ACS census data, the total population in the AA has not changed significantly since 2010. The population was slightly down from the 2010 Census, declining from 3,795 to 3,646. The distribution of families by income level in 2016 was 100 percent upper-income. The percentage of families living below the poverty level was 5.2 percent. The distribution of families by income level shifted in 2018, with 100 percent in middle-income. The rate of poverty decreased to 3.4 percent.

The 2018 FFIEC adjusted median family income for the AA was \$63,900 up from \$58,000 in 2016. Low-income families earned annual income of \$31,950 or less, and moderate-income families earned annual income of \$31,950 to \$51,120.

Median Family Income Ranges												
Median Family Incomes	Low <50%											
Illinois Non-MSA FFIEC Adjusted Median Family Income												
2016 (\$58,000)	<\$29,000	\$29,000 to <\$46,400	\$46,400 to <\$69,600	≥\$69,600								
2017 (\$60,400)	<\$30,200	\$30,200 to <\$48,320	\$48,320 to <\$72,480	≥\$72,480								
2018 (\$63,900)	<\$31,950	\$31,950 to <\$51,120	\$51,120 to <\$76,680	≥\$76,680								

## **Employment Factors**

The annual unemployment rate in Washington County decreased from 3.8 percent in 2016 to 3.0 percent in 2018. The unemployment rate in Washington County is historically lower than the Illinois statewide and national unemployment rates.

The AA economy is concentrated within the agricultural and service industries. Based on Dun & Bradstreet (DB) business demographic data, the primary industries in the area are services (32.2 percent), agriculture, forestry, and fishing (26.3 percent) and retail trade (11.4 percent). Over 72 percent of businesses in the AA report having one to four employees. Major employers in the area are agriculture production or related industries and the public-school system.

Annual Unemployment Rates 2016-2018										
Area	2018									
Washington County	3.8%	3.0%	3.0%							
State of Illinois	5.8%	4.9%	4.3%							
National	4.9%	4.4%	3.9%							
Source: U.S. Dept. of Labor; Bureau	of Labor Statistics									

## **Housing Characteristics**

The 2010 U.S. Census reported total housing units of 1,710 in the AA. Of the total number of housing units, 1,340 or 78 percent were owner-occupied, 275 or 16.1 percent were renter-occupied, and 95 or 6 percent were vacant. All housing units were located in the only CT, which was upper-income. The 2010 U.S. Census indicates the weighted average median housing value was \$128,300 and the weighted average monthly gross rent was \$684.

The 2015 ACS Census reported total housing units of 1,737 in the AA. Of the total number of housing units, 1,259 or 72 percent are owner occupied, 232 or 13 percent are renter occupied, and 246 or 14 percent are vacant. All housing units were located in the middle-income CT. As previously noted, the

CT changed to middle-income since the 2010 Census. The 2015 U.S. Census indicates the weighted average median housing value was \$121,500 and the weighted average monthly gross rent was \$710.

Homeownership affordability was an issue that limited mortgage demand, particularly among low income borrowers.

## **Scope of Evaluation in Illinois**

We performed a full-scope evaluation of the bank's only AA. Refer to Appendix A for more information.

## **LENDING TEST**

The bank's performance under the Lending Test in Illinois is rated Outstanding.

Based on a full-scope review, the bank's lending performance in the state of Illinois is excellent.

## Distribution of Loans by Income Level of the Geography

During the 2016 evaluation period, FNBO's AA consisted of one upper-income CT. After the 2015 ACS update, the upper-income CT shifted to a middle-income CT. Since the bank's AA did not include any low- or moderate-income CTs during the evaluation period, a geographic distribution or lending gap analysis would not yield meaningful results for consideration in the bank's Lending Test rating.

## Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and farms of different sizes, given the product lines offered by the bank.

#### Small Loans to Farms

Refer to Table T in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

#### *2016*

The borrower distribution of FNBO's loans to small farms for the 2016 evaluation period is excellent. The bank originated 100 percent of its farm loans to small farms, which compares favorably to the percentage of small farms in the AA (96.9 percent) and indicates the bank is serving the needs of the small farms in its AA. We also noted the bank's performance in 2016 was significantly above the 2016 CRA aggregate data for lending to small farms in the same AA (9.1 percent); however, we did not place significant weight on this information as most rural lenders do not report small farm data to the U.S. Census Bureau.

#### 2017-2018

The borrower distribution of FNBO's loans to small farms for the 2017-18 evaluation period is excellent. The bank originated 100 percent of its farm loans to small farms, which compares favorably to the percentage of small farms in the AA (96.8 percent) and indicates the bank is serving the needs of the small farms in its AA. We also noted the bank's performance in 2017-2018 was significantly above the 2017-2018 CRA aggregate data for lending to small farms in the same AA (12.5 percent); however, we did not place significant weight on this information as most rural lenders do not report small farm data to the U.S. Census Bureau.

#### Consumer Loans

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

#### 2016

The borrower distribution of FNBO's loans to consumers for the 2016 evaluation period is excellent. We sampled 20 consumer loans originated in 2016. Five loans (25 percent) were made to low-income borrowers and two loans (10 percent) were made to moderate-income borrowers. These ratios exceed the percentage of low-income households (17.8 percent) and moderate-income households (9.4 percent) within the AA. Six loans (30 percent) did not contain documented income because they were secured by deposits.

#### 2017-2018

The borrower distribution of FNBO's loans to consumers for the 2017-2018 evaluation period is excellent. We sampled 20 consumer loans originated between 2017 and 2018. Eight loans (40 percent) were made to low-income borrowers and three loans (15 percent) were made to moderate-income borrowers. These ratios exceed the percentage of low-income households (12.9 percent) and moderate-income households (16 percent) within the AA.

#### **Responses to Complaints**

During the evaluation period, FNBO did not receive any complaints regarding its CRA performance.

# **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 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".

Time Period Reviewed:	10/21/2014 - 12/31/2018									
Bank Products Reviewed:	Consumer Loans and Small Farm Loans									
Affiliate(s)	Affiliate Relationship	Products Reviewed								
None	N/A	N/A								
List of Assessment Areas and Type o	f Examination									
Rating and Assessment Areas	Type of Exam	Other Information								
Illinois										
Illinois Non-MSA	Full-Scope	CT 9502 in Northwest Washington County, IL								

# **Appendix B: Summary of MMSA and State Ratings**

RATINGS: The First National Bank of Okawville								
Overall Bank:	Lending Test Rating							
The First National Bank of Okawville	Outstanding							
State:								
Illinois	Outstanding							

# **Appendix C: Definitions and Common Abbreviations**

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**

## **Content of Standardized Tables**

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

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

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

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

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

Table S - Assess	Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography   201													2016					
		Total L	oans to	Farms	Low	v-Income	Tracts	Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Illinois Non-MSA	20	1,841	100.0	11	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0
Total	20	1,841	100.0	11	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table S - Assess	mei	nt Are	ea Dist	ribution	n of Lo	ans to	Farms by	Incom	e Cate	gory of th	ie Geog	graphy							2017-18	
	Total Loans to Farms			arms	Lov	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Illinois Non-MSA	20	1,987	100.0	16	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	20	1,987	100.0	16	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table T: Assessment A	Fable T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016													
		Total Loa	ns to Farms		Farms	with Revenues <=	= 1MM	Farms with Ro	evenues > 1MM	Farms with Revenues Not Available				
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans			
Illinois Non-MSA	20	1,841	100.0	11	96.9	100.0	9.1	3.1	0.0	0.0	0.0			
Total	20	1,841	100.0	11	96.9	100.0	9.1	3.1	0.0	0.0	0.0			

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table T: Assessment	Area Dist	ribution o	of Loans t	o Farms b	y Gross An	nual Revenu	ies				2017-18	
		Total Loai	ns to Farms		Farms	s with Revenues	<= 1MM	Farms with Re	venues > 1MM	Farms with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Illinois Non-MSA	20	1,987	100.0	16	96.8	100.0	12.5	3.2	0.0	0.0	0.0	
Total	20	1,987	100.0	16	96.8	100.0	12.5	3.2	0.0	0.0	0.0	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table U: Assessr	able U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 20													
	Total Consumer Loans				e Tracts	Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Illinois Non-MSA	20	237	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	
Total	20	237	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0

Table U: Assessi	ment .	Area Di	stributio	on of Consu	mer Loa	ns by Incon	ne Categ	ory of the G	Geograph	$\mathbf{y}$			2017-18
	Total Consumer Loans				e Tracts	Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Illinois Non-MSA	20	670	0.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
Total	20	670	0.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0

Table V - Assessr	able V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2016													
	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Illinois Non-MSA	20	237	100.0	17.8	25.0	9.4	10.0	19.9	15.0	52.9	20.0	0.0	30.0	
Total	20	237	100.0	17.8	25.0	9.4	10.0	19.9	15.0	52.9	20.0	0.0	30.0	

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data.

Due to rounding, totals may not equal 100.0

Table V - Assessm	Cable V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower   2017-18													
	Total Consumer Loans				Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		ncome wers	Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Illinois Non-MSA	20	670	100.0	12.9	40.0	16.0	15.0	18.7	20.0	52.4	25.0	0.0	0.0	
Total	20	670	100.0	12.9	40.0	16.0	15.0	18.7	20.0	52.4	25.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.

Due to rounding, totals may not equal 100.0