



PUBLIC DISCLOSURE

June 7, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Barrington Bank & Trust Company, National Association
Charter Number: 23216

201 South Hough Street
Barrington, IL 60010

Office of the Comptroller of the Currency

Midsized Bank Supervision
425 S. Financial Place, Suite 1700
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 Barrington Bank & Trust Company, National Association, with respect to the Lending, Investment, and Service Tests:

Performance Levels	Barrington Bank and Trust Company, N.A. 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:

- The Lending Test rating is based on the performance in the state of Illinois rating area. The excellent geographic distribution of loans in its Assessment Areas (AA) and the high use of flexible lending programs were considered in arriving at the overall Lending Test rating.
- The Investment Test rating is based on performance in the state of Illinois rating area. The bank has an excellent level of qualified community development (CD) investments and grants across the rating area and at the national level.
- The Service Test rating is based on performance in the state of Illinois rating area. Branch distribution in the bank’s AA was excellent.

Lending in Assessment Area

A very small percentage of the bank’s loans are in its AA.

The bank originated and purchased 3.6 percent of its total loans inside the bank’s AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,780	2.7	63,470	97.3	65,250	480,229	2.9	15,977,159	97.1	16,457,388
Small Business	1,492	5.3	26,792	94.7	28,284	120,336	13.5	773,258	86.5	893,594
Small Farm	1	100.0	0	0.0	1	115	100.0	0	0	115
Consumer	125	76.7	38	23.3	163	316	22.1	1,114	77.9	1,430
Total	3,378	3.6	90,295	96.4	93,673	600,947	3.5	16,751,520	96.5	17,352,467

Nationwide lending programs utilized by the bank impact the ratio of loans located inside the bank's AA. Home mortgage and small business loans are the bank's primary products based on volume of loans by number. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography.

Description of Institution

Barrington Bank and Trust (BBT or the bank) is a \$3.6 billion interstate bank headquartered in Barrington, Illinois. BBT is a wholly-owned subsidiary of Wintrust Financial Corporation (WFC). As of December 31, 2020, WFC is a \$45 billion financial services holding company located in Rosemont, Illinois. WFC's business strategy includes working with customers in the Chicago metropolitan area, southern Wisconsin, and northwest Indiana by way of their 15 wholly-owned banking subsidiaries and more than 150 bank locations.

WFC locations provide a wide range of lending and deposit products and services to their customers. WFC residential mortgage applications are referred to Wintrust Mortgage (WM). WM, a division of BBT, is a national residential mortgage operation with offices throughout the United States. WM offers a wide variety of retail mortgages and originates nearly all WFC mortgages. Loans that cannot be sold on the secondary market are purchased by any one of the 15 WFC banks for their portfolio.

WFC provides niche lending products across the nation within their community banks. Aside from WM, BBT has a commercial niche specialty division entitled Community Advantage (CA). CA provides financial services to condominiums, townhomes, and homeowners' associations. Most of the CA loans are in the greater Chicagoland area; however, CA loans are made nationwide.

WFC banks offer specialty products including wealth management, leasing financing, insurance premium financing through First Insurance Funding (FIFCO), short-term account receivable financing, administrative services outsourcing, franchise lending, firm partnership loans, and financial solutions for mission-based organizations.

As of December 31, 2020, BBT reported total loans of \$3.1 billion, representing 86 percent of total assets. BBT has three primary loan types that make up 92 percent of the total loan portfolio. The primary loan products include approximately \$1.5 billion of one-to four-family residential loans or 49 percent of total loans, \$762 million of commercial loans or 25 percent of total loans, and \$545 million consumer loans or 18 percent of the total loan portfolio. BBT had tier 1 capital of \$362 Million.

The bank operates eight full-service locations and 10 deposit-taking Automated Teller Machines (ATMs). Since our last Public Evaluation, BBT opened a new branch in November 2019 in Palatine, Illinois within the bank's AA.

According to the June 30, 2020 Federal Deposit Insurance Corporation (FDIC) deposit market share report, BBT had 0.4 percent market share making it the 27th largest deposit holder out of 466 financial institutions in the state.

There were no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period. There were no acquisitions or mergers during the evaluation period that would have affected the bank's CRA performance or the OCC's analysis. BBT's CRA performance was rated "Outstanding" in the last Public Evaluation dated June 6, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's performance under the large bank Lending, Investment, and Service Tests. The evaluation period is January 1, 2018 through December 31, 2020.

In evaluating the bank's lending performance, the OCC analyzed home mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses and small loans to farms the bank reported under the CRA. At the bank's request, the OCC considered the consumer loan products, which consists of secured and unsecured loans. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. Multifamily loans and small loans to farms are not primary loan products; therefore, we did not evaluate these products separately. However, we did consider multifamily loans meeting the CD definition as part of the evaluation of CD lending.

The OCC compared bank loan data for all applicable years in the state rating area to: demographic data using the U.S. Census American Community Survey (ACS); Federal Financial Institutions Examination Council (FFIEC) adjusted median family incomes; 2019 Dun and Bradstreet (D&B) small business demographic data; 2019 peer mortgage loan data reported under HMDA; and 2019 peer small business data reported under CRA.

In evaluating the geographic distribution and borrower income criteria under the Lending Test for HMDA and CRA, 2018 through 2020 data was analyzed and aggregated. Performance Tables O, P, Q, R, U, and V in Appendix D include data covered by the analysis period 2018 through 2020.

Banks are not required to report data on consumer loans; therefore, no peer aggregate data was available against which to compare bank consumer lending.

Bank and branch deposit data is as of June 30, 2020, based on information from the FDIC. The distribution of bank branches is compared to U.S. Census 2015 ACS population estimates.

We also evaluated retail services, qualified investments, and CD services from January 1, 2018 through December 31, 2020. Qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are addressed in this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AA located within the same combined statistical area (CSA) are combined and evaluated as a single AA. The combined AA was evaluated as full-scope. The AA was comprised of contiguous MDs/MSAs that are part of a CSA; therefore the bank's performance is presented at the CSA level.

Refer to the Scope section under the State Rating section for details regarding how the full-scope AA were selected. Refer to Appendix A, Scope of Examination, for a list of the full-scope AA. There are no limited-scope AAs.

Ratings

The bank's overall rating was based on the state rating.

Refer to the Scope section under the State Rating section for details regarding how the area was weighted in arriving at the respective ratings.

In evaluating the bank's performance under the Lending Test, we placed equal weight on the bank's distribution of home mortgage loans and the distribution of small business loans based on the volume. Consumer loans received less weight due to the volume.

Generally, equal emphasis is given to the geographic distribution of loans and lending by borrower income level. Greater weight was generally given to performance compared to aggregate lenders than to performance relative to demographic factors in lending. The analysis included both the number and dollar volume of lending. The analysis of lending, except for CD loans, emphasized the number of loans rather than the dollar volume because it is a better indicator of the number of businesses or individuals served.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.17, 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending activity reflects an adequate responsiveness to credit needs in its AA.
- The bank exhibits an excellent geographic distribution of loans in its AA.
- The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank has made an adequate level of CD loans.
- The bank has an excellent level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.
- Its service delivery systems are readily accessible to geographies and individuals of different income levels in its AAs.
- The bank is a leader in providing CD Services.

Description of Institution's Operations in the State of Illinois

BBT designated one AA in Illinois, which is the Chicago-Naperville, IL-IN-WI CSA (Chicago CSA). The Chicago CSA consists of the two MSAs which were combined for analysis purposes. These MSAs are the Chicago-Naperville-Evanston MSA and Lake County MSA. The Chicago-Naperville-Evanston MSA consists of Cook County, and the Lake County MSA consists of Lake County.

BBT's AA consists of 80 contiguous census tracts (CTs) located in the northwestern portion of Cook County, Illinois (67 CTs) and the southwestern portion of Lake County, Illinois (13 CTs). The AA includes all or a portion of the following towns; Barrington, Barrington Hills, South Barrington, North Barrington, Lake Barrington, Hoffman Estates, Hawthorn Woods, Kildeer, Lake Zurich, Long Grove, Elk Grove Village, Streamwood, Bartlett, Palatine, Inverness, Elgin, Roselle, Tower Lakes, Deer Park, and Schaumburg.

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 80 CTs, of which there are no low-income and eight are moderate-income.

Chicago CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	80	0.0	10.0	33.8	56.3	0.0
Population by Geography	427,299	0.0	9.2	34.5	56.3	0.0
Housing Units by Geography	161,306	0.0	8.5	35.0	56.5	0.0
Owner-Occupied Units by Geography	115,211	0.0	4.7	32.0	63.3	0.0
Occupied Rental Units by Geography	37,107	0.0	19.3	42.9	37.8	0.0
Vacant Units by Geography	8,988	0.0	12.1	41.1	46.8	0.0
Businesses by Geography	34,606	0.0	13.9	24.6	61.6	0.0
Farms by Geography	577	0.0	7.6	25.1	67.2	0.0
Family Distribution by Income Level	110,181	13.3	14.5	20.0	52.3	0.0
Household Distribution by Income Level	152,318	15.2	13.1	17.7	54.0	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$281,306
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137	Median Gross Rent			\$1,208
			Families Below Poverty Level			5.0%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Community Contacts

The OCC made three community contacts in the AA, which included one global nonprofit housing agency and two Chicagoland nonprofit organizations focused on neighborhood revitalization and economic development in low- and moderate-income (LMI) areas. The OCC also reviewed the Lake County, Illinois 2019 Annual Action Plan for Housing and Urban Development Funding. Community contacts indicated that the following are identified needs within the bank’s AA.

- Home mortgages in LMI areas,
- Home improvement loans regardless of appraisal gaps,
- Accept a wide range of mortgage down payment and closing cost assistance,
- Financing multifamily buildings for acquisition and rehabilitation,
- Small loans to small businesses,
- Board and Committee volunteerism,
- Financial education, student loan counseling, debt management counseling, and
- Homebuyer counseling programs.

Housing Characteristics

The housing market in the AA is challenged, as demand exceeds housing supply, and prices continue to trend upwards. Rentals have also not been affordable for LMI families. The lack of affordable housing supply has increased rental costs, thereby making it difficult for LMI families to purchase homes in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among LMI borrowers. The 2020 FFIEC adjusted median family income (AMFI) in the AA is \$87,100. According to Realtor.com data, the median housing value in the AA is \$288,950 and \$342,445 in 2018 and 2020, respectively, reflecting an 18.5 percent increase.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$43,550 per year (or less than 50 percent of the 2020 FFIEC AMFI in the AA) could afford a \$202,814 mortgage with a payment of \$1,089 per month. A moderate-income borrower making \$69,680 per year (or less than 80 percent of the 2020 FFIEC AMFI in the AA) could afford a \$324,503 mortgage with a payment of \$1,742 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,838.

Scope of Evaluation in the State of Illinois

The Chicago CSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

There are no low-income geographies in the bank's AA. For the analysis of distribution of loans to geographies with different income levels, greater consideration was given to the bank's performance in moderate-income geographies.

For the borrower distribution analysis, consideration was given to the impact that income and housing costs have on limiting homeownership opportunities of LMI individuals and families. Additionally, consideration was given to the impact of home affordability for LMI borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. It is difficult for many LMI borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualification. As such, more emphasis was placed on the bank's lending results to LMI borrowers relative to the aggregate performance rather than the demographic data.

In performing the analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses. A significant portion of the bank's small loans to businesses did not contain revenue information, as permitted under the CRA reporting requirements. Many of these loans were acquired by FIFCO and for which revenue data was not provided, or the loans were originated under a loan product for which the business revenue is not considered in underwriting. We took into consideration the bank's significant nationwide niche lending programs when assessing the bank's performance regarding lending within its AA versus

outside AA lending. More emphasis was placed on the bank's lending relative to aggregate performance.

In performing the analysis of investments, competition in the AA is high, with large interstate, regional, and community banks competing for qualified investments in the market.

The service test includes an evaluation of the availability and effectiveness of a bank's systems for delivering retail banking services, including the current distribution of the bank's branches among different income geographies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago CSA is excellent.

Lending Activity

Lending levels reflect an adequate responsiveness to AA credit needs. The bank's rank in home mortgage is greater than the bank's ranking in deposits. The small business lending was weaker; however, we considered the substantial volume of loans originated through a subsidiary for insurance premium financing in the analysis.

Number of Loans*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Consumer	Community Development	Total	%State Loans	%State Deposits
Chicago CSA	1,780	1,492	1	125	25	3,423	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Consumer	Community Development	Total	%State* Loans	%State Deposits
Chicago CSA	\$480,229	\$120,336	\$115	\$316	\$23,742	\$624,738	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the FDIC Deposit Market Share data as of June 30, 2020, the bank ranked 19th out of 108 insured depository institutions (top 18 percent) with a deposit market share of 0.6 percent.

According to 2019 peer mortgage data, the bank ranked eighth in the market of 357 home mortgage lenders, originating 472 loans with a market share of 2.7 percent. The bank's rank

and market share in loans is stronger than the rank in deposits and market share. The five largest mortgage lenders have captured 30.8 percent of the market.

According to 2019 peer small business data, the bank ranked 31st in the market of 202 small business lenders, originating 480 loans with a market share of 0.3 percent. The bank's rank in and market share in loans is weaker than the rank in deposits and market share. The five largest small business lenders have captured 67.7 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA. Examiners placed more emphasis on the bank's performance in moderate-income geographies as the AA did not include any low-income census tracts.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate distribution.

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

The percentage of home mortgage loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in those geographies and below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

The geographic distribution of small business loans reflects excellent distribution.

Refer to Table Q in the state of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The percentage of small business loans originated or purchased in moderate-income geographies exceeds the percentage of businesses located in those geographies and exceeds the aggregate percentage of all reporting lenders.

Consumer Loans

The geographic distribution of consumer loans reflects excellent distribution.

Refer to Table U in the state of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The percentage of consumer loans originated or purchased in moderate-income geographies exceeds the percentage of households located in those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

The distribution of home mortgage loans among individuals of different income levels is good.

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

The high cost of housing and the negative impact on economic conditions caused by the pandemic in 2020 may have limited opportunities to the bank's ability to make home mortgage loans to LMI borrowers. These contexts are considered in the analysis.

The percentage of home mortgage loans originated or purchased to low-income borrowers is significantly below the percentage of families in the AA. The loans to moderate-income borrowers exceeds the percentage of families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers is below the aggregate percentage of all reporting lenders. In moderate-income geographies, the percentage of home mortgage loans originated or purchased is near to the aggregate percentage of all reporting lenders.

Small Loans to Businesses

The distribution of loans to businesses of different sizes is good.

Refer to Table R in the state of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The percentage of loans to small businesses originated or purchased is below the percentage of small businesses in the AA but exceeds the aggregate percentage of all reporting lenders.

BBT originates a substantial volume of loans through a subsidiary for insurance premium financing, which is a nationwide product and are underwritten without the collection of revenue data. Per Table R, 14.1 percent of the small business loans have no revenue data. Given this context, the performance under this criterion is considered good.

Consumer Loans

The distribution of consumer loans among individuals of different income levels is excellent.

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

The percentage of consumer loans originated or purchased to LMI borrowers exceeds the percentage of households.

Community Development Lending

The institution has made an adequate level of CD loans, and the level of CD lending practices has a neutral impact on the lending test conclusion.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

BBT made 25 CD loans totaling over \$23.7 million, which represented 6.6 percent of allocated tier 1 capital. CD loans in the AA primarily supported affordable housing, community services, and revitalization or stabilization of LMI geographies.

Examples of CD loans in the AA include:

- Six new and renewed loans totaling \$11.1 million to an entity for the purchase, construction, and working capital for commercial retail properties, which will be used to open two restaurants. The loan serves to promote economic development and job creation for LMI individuals.
- Three renewed revolving operating line of credit loans totaling \$815,000 to a nonprofit organization. The mission of the organization is to create and implement programs to promote affordable housing. They promote public and private partnerships that create and preserve cost-effective quality housing for LMI residents and workers through housing development and renovation, education, and advocacy.
- Four new loans totaling \$710,450 to a nonprofit housing developer. Their mission is to create healthy communities by providing affordable housing, housing counseling, and connecting LMI people and families to affordable housing resources. The loans were to acquire and rehabilitate various affordable housing multifamily buildings. Units range from one and two bedrooms with below market rental rates within the AA.

Product Innovation and Flexibility

The institution makes extensive use of innovative or flexible lending practices in order to serve AA credit needs. We considered the loan programs, which provided opportunities with direct benefit to LMI borrowers and small businesses within the AA. The product use has a positive impact on the lending test conclusion for the Chicago CSA.

Paycheck Protection Program (PPP)

The bank made use of responsive flexible lending during the pandemic in 2020 by originating loans to stabilize small businesses and communities through the Small Business Administration (SBA) PPP. During the evaluation period, the bank originated 421 PPP loans totaling \$60.3 million in the AA and with a combined total of 608 PPP loans totaling \$148.1 million originated within the state of Illinois. This activity received positive consideration as it provided stabilization of small businesses and communities.

Down Payment Assistance (DPA)

BBT works in conjunction with several housing agencies across the AA to offer affordable housing assistance programs to first time homebuyers. These affordable loan products are offered under the agency's programs, which may include DPA, closing cost assistance, and tax credits. A DPA is a second mortgage loan and is subordinate to the first mortgage used to cover down payment and closing costs. These programs are structured in a variety of ways including forgivable grants and zero interest loans. During the evaluation period, BBT made loans among various flexible lending products, which included 1,832 Illinois Housing and Development Authority (IHDA) Access program loans totaling \$158 million and 164 loans Federal Home Loan Bank (FHLB) Down Payment Program loans totaling \$954,080. This activity received positive consideration as it provided access to affordable housing to LMI borrowers.

Other Programs

Money Smart Everyday Loan is offered as an alternative to payday loans. These loans provide unsecured financing from \$500 to \$2,500 as an alternative to payday lenders with lower interest rates and up to 24-month repayment terms. The bank originated 77 loans totaling \$171,126.

Money Smart Certificate of Deposit Secured Loan is offered to assist persons with very low credit scores and to those with non-established or blemished credit histories. The loan is secured by a certificate of deposit that grows as the loan is repaid in monthly installments. After payoff, customers receive use of the money from the certificate of deposit and reporting of credit history. During the evaluation period, the bank originated 40 loans totaling \$44,153.

Easy Access Line of Credit (LOC) and Easy Access Installment programs are small and micro loans offered to small businesses, which are a noted need in the community. These programs are targeted to help meet the needs of small businesses with revenues of less than \$1.0 million with short-term LOC funding to support inventory and accounts receivables as well as support with secured and unsecured term loans. During the evaluation period, the bank originated 142 Easy Access LOC totaling \$5.7 million and 65 Easy Access Installment loans totaling \$1.8 million.

The bank actively participates in SBA programs including the 504-loan program, 7a loan program, and the Express program. A total of 37 loans totaling \$20.1 million were originated under these programs.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago CSA is excellent. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

The bank has an excellent level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago CSA	31	10,871	155	17,079	220	95.2	28,066	99.3	5	1,776
Regional	0	0	11	205	11	4.8	205	0.7	0	0

* Prior Period Investments' means investments made in a previous evaluation 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.

Qualified investments, within the Chicago CSA, totaled \$28.0 million, with current period investments of \$16.5 million, prior period investments of \$10.9 million, and qualified grants of \$675,478. Investments benefiting the AA during the evaluation represented eight percent of allocated tier 1 capital. The bank also had \$1.8 million in unfunded commitments remaining at the end of the evaluation period. The unfunded commitments consisted of small business investment companies (SBIC) and mutual funds.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$10.9 million primarily in bonds, mutual funds, and SBIC.

A \$1.3 million equity equivalent investment product (EQ2) to a nonprofit Community Development Financial Institution (CDFI) demonstrated innovation and complexity. The CDFI is involved in affordable housing, social services, and economic development initiatives that benefit LMI families throughout the Chicagoland area. An EQ2 is an investment of equity in a nonprofit lender which enhances their flexibility to support LMI communities and small businesses.

A \$1.0 million investment in a national Low-Income Housing Tax Credit (LIHTC) syndicator, which demonstrated responsiveness to the community. The investment supported a LIHTC project within the bank's AA. The LIHTC plays an integral role in creating affordable housing options, revitalizing communities, and strengthening local economies. This organization has total investments of \$12.4 billion in 2,400 LIHTC developments, which created 149,000 affordable homes for low-income families and individuals.

Grants made were to organizations providing community services and affordable housing benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$150,000 to a nonprofit organization that seeks to provide housing for people that are homeless, at risk of foreclosure, or living in inadequate housing.
- \$77,000 to a nonprofit organization that provides private school scholarships to low-income students.
- \$18,182 to an organization that uses their funds exclusively for LMI individuals or individuals living in LMI geographies to provide assistance with daycare for LMI families, elder abuse, family shelters, nutrition for low income elderly, and summer programs for teens in at risk neighborhoods.
- \$14,286 in grants to an organization that undertakes large scale, high-impact real estate projects in underserved areas of Chicago, targeting LMI income neighborhoods.
- \$10,000 in grants to an organization that provides comprehensive family counseling, youth outreach and prevention programs for children in need. Most of their clients are LMI, which pay reduced fees since fees are based on the ability to pay.

Regional

BBT provided nine grants totaling \$197,500 to a university that provides scholarships to first generation low-income students. This donation is part of a larger WFC pledge to provide the university with \$5.5 million in donations over the course of ten years to support the scholarship fund.

The bank also provided two grants totaling \$5,112 split between two different organizations that provide community services to a regional area.

SERVICE TEST

The bank's performance under the Service Test in the state of Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on the full-scope review, the bank's performance in the Chicago CSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Chicago CSA	100.0	8	100.0	0.0	25.0	25.0	50.0	0.0	9.2	34.5	56.3

The bank has eight branches in the AA, with two in moderate-income geographies. The percentage of branches located in moderate-income areas exceeds the percentage of the population residing in the geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Chicago CSA	1	0	0	+1	0	0

To the extent changes have been made, the bank’s opening of branch has improved the accessibility of its delivery systems, particularly in LMI geographies or to LMI individuals. There was one branch opened in a moderate-income CT. No branches were closed in the AA during the evaluation period.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. BBT has eight ATMs in the AA, of which two are deposit-taking in moderate-income CTs of the AA. The alternative delivery systems have a neutral impact on the Service Test.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank is a leader in providing CD Services.

CD services were effective and responsive in helping the bank address the community needs in a variety of different organizations and hours of service that employees participated in to support the LMI individuals and families. BBT employees from various lines of business provided 446 service activities totaling 3,627 hours during the evaluation period. They included serving on committees and boards for organizations that promote affordable housing, community services, and financial literacy in the bank’s assessment area. Services reflected ongoing relationships with several organizations in the AA.

Examples of some of these services, which are responsive to the community's needs, particularly small business assistance included the following:

- Various employees served 370 hours for an organization which provides economic opportunities, advocating the interest of small businesses and providing members with education opportunities. A majority of the businesses in this area are small businesses with less than ten employees.
- A bank employee provided 91 hours on a loan review committee for a nonprofit development company. The organization, which is certified by the SBA, partners with community banks to provide funding needed to support growth. The service consisted of reviewing and approving loan requests from businesses that may not be able to obtain conventional loan financing.
- Several employees provided 49 hours to a nonprofit organization. The organization's mission is to provide services and programs that support and accelerate women's business ownership. The employees supported with mentoring and financial coaching to local business owners.

FDIC Money Smart

The bank leverages the FDIC Money Smart financial education program, which helps individuals of all ages enhance their financial skills and create positive banking relationships. The Money Smart program provides basic financial concepts to students in kindergarten through 12th grade and training for adults in many different life stages and financial situations. The program reaches adults new to the country, adults with disabilities, adults starting or changing careers, and adults going through significant life events such as expanding their families or purchasing or renting their first homes. Curriculum includes education on preventing elder financial exploitation and for small businesses related to starting and managing a business.

Bank employees provided 108 and 79 hours for the periods of 2019 and 2020, respectively, using the FDIC Money Smart Financial Program to small business and LMI individuals in the AA.

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:	01/01/2018 to 12/31/2020	
Bank Products Reviewed:	Home mortgage, small business, consumer loans CD loans, qualified investments, and CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
<i>State of Illinois</i>		
Chicago CSA	Full Scope	Partial Counties of Cook and Lake in Illinois

Appendix B: Summary of State Ratings

BARRINGTON BANK & TRUST COMPANY, N.A. RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank Rating
BBT	Outstanding	Outstanding	Outstanding	Outstanding
State:				
State of Illinois	Outstanding	Outstanding	Outstanding	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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 (MD): 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 (MSA): 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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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 loans are treated the same 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 30th 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 aggregate 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 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018-2020

Assesment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Chicago CSA	1,780	480,229	100.0	0.0	0.0	0.0	4.7	3.1	4.1	32.0	26.5	30.9	63.3	70.4	65.0	0.0	0.0	0.0
Total	1,780	480,229	100.0	0.0	0.0	0.0	4.7	3.1	4.1	32.0	26.5	30.9	63.3	70.4	65.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018-2020

Assesment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Chicago CSA	1,780	480,229	100.0	13.3	3.4	4.3	14.5	16.4	17.8	20.0	23.5	22.1	52.3	51.2	43.9	0.0	5.4	11.9
Total	1,780	480,229	100.0	13.3	3.4	4.3	14.5	16.4	17.8	20.0	23.5	22.1	52.3	51.2	43.9	0.0	5.4	11.9

Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2018-2020**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago CSA	1,492	120,336	100.0	0.0	0.0	0.0	13.9	15.8	12.5	24.6	22.7	24.6	61.6	61.6	63.0	0.0	0.0	0.0
Total	1,492	120,336	100.0	0.0	0.0	0.0	13.9	15.8	12.5	24.6	22.7	24.6	61.6	61.6	63.0	0.0	0.0	0.0

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2018-2020**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago CSA	1,492	120,336	100.0	14,652	84.6	60.7	51.2	6.0	25.2	9.4	14.1
Total	1,492	120,336	100.0	14,652	84.6	60.7	51.2	6.0	25.2	9.4	14.1

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the 2018-2020 Geography

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago CSA	125	316	100.0	0.0	0.0	8.3	12.0	34.6	43.2	57.1	44.8	0.0	0.0
Total	125	316	100.0	0.0	0.0	8.3	12.0	34.6	43.2	57.1	44.8	0.0	0.0

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.
Due to rounding, totals may not equal 100.0%*

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the 2018-2020 Borrower

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago CSA	125	316	100.0	15.2	55.2	13.1	23.2	17.7	11.2	54.0	8.0	0.0	2.4
Total	125	316	100.0	15.2	55.2	13.1	23.2	17.7	11.2	54.0	8.0	0.0	2.4

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.
Due to rounding, totals may not equal 100.0%*