



PUBLIC DISCLOSURE

June 7, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Lake Forest Bank & Trust Company, National Association
Charter Number: 25149

727 North Bank Lane
Lake Forest, IL 60045

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 Lake Forest Bank & Trust Company, National Association, with respect to the Lending, Investment, and Service Tests:

Performance Levels	Lake Forest Bank & Trust Company, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
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 and state of Florida rating areas. The excellent geographic distribution of loans in its Assessment Areas (AA), and the relatively high use of flexible lending programs was considered in arriving at the overall Lending Test rating. The performance of the bank’s community development (CD) loans had a positive impact.
- The Investment Test rating is based on performance in the state of Illinois and state of Florida rating areas. The bank has an excellent level of qualified community development (CD) investments and grants across the rating area, statewide, and at the national level.
- The Service Test rating is heavily based on performance in the state of Illinois rating area, which was excellent. Overall branch distribution in the bank’s AA was good considering the negative impact of the state of Florida rating area, which was poor.

Lending in Assessment Area

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

The bank originated and purchased 0.4 percent of its total loans inside the bank’s AAs 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	97	31.5	211	68.5	308	55,144	21.9	196,621	78.1	251,765
Small Business	3,496	0.3	1,013,574	99.7	1,017,070	257,489	0.9	27,407,576	99.1	27,665,065
Consumer	97	80.2	24	19.8	121	3,837	63.6	2,193	36.4	6,030
Total	3,690	0.4	1,013,809	99.6	1,017,499	316,470	1.1	27,606,390	98.9	27,922,860

Nationwide lending programs utilized by the bank impact the ratio of loans located inside the bank's AA. Small business loans represent the primary product due to the 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

Lake Forest Bank and Trust (LFBT or the bank) is a \$5.9 billion interstate bank headquartered in Lake Forest, Illinois. LFBT 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 areas, 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 an affiliate bank, 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. WFC banks offer specialty products including wealth management, lease financing, insurance premium financing through First Insurance Funding (FIFCO), short-term account receivable financing, administrative services outsourcing, franchise lending, firm partnership loans, financial servicing to condominiums, townhomes and homeowner's associations, and financial solutions for mission-based organizations.

LFBT offers trust and investment management services through their subsidiary, The Chicago Trust Company, with offices in downtown Chicago and various banking offices. Outside of The Chicago Trust Company, WFC offers other wealth management services such as investment advisory and money management services.

As of December 31, 2020, LFBT reported total loans of \$4 billion representing 68 percent of total assets. LFBT has three primary loan product types that make up 92 percent of the total loan portfolio. The bank's primary loan product is commercial loans, which totaled \$2.8 billion or 70 percent of total loans. LFBT's other primary loan products include loans secured by nonfarm, nonresidential properties of \$461 million or 12 percent of total loans and consumer loans of \$410 million or ten percent of total loans. LFBT had tier 1 capital of \$495 million.

The bank operates nine full-service branches. There are eight branch locations in Illinois and one in Florida, with 14 full service Automated Teller Machines (ATMs). Since our last Public Evaluation, LFBT opened a new branch in Waukegan, Illinois in May 2019 and one in Naples, Florida in March 2019. The branch opening in Florida expanded the bank's footprint in a new market and added the AA. The Illinois locations are in Lake Forest, Lake Bluff, Highwood, Highland Park, North Chicago, and Waukegan. Each of these locations offer traditional weekday hours with the only difference being the Naples, Florida location does not have any Saturday hours.

According to the June 30, 2020 Federal Deposit Insurance Corporation (FDIC) deposit market share report in the state of Illinois, LFBT had 0.7 percent market share making it the 19th largest deposit holder out of 466 financial institutions. In the state of Florida, LFBT had less than 0.1 percent market share making it the 157th out of 196 financial institutions in that AA.

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. LFBT's CRA performance was rated outstanding in the last Public Evaluation dated April 18, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) 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 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, and the bank did not originate or purchase any small loans to farms during the evaluation period; 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 AA within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA) or combined statistical area (CSA) are

combined and evaluated as a single AA. These combined AAs may be 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 each State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full-scope AAs. There are no limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings.

Refer to the Scope section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The state of Illinois rating area carried the greatest weight in the conclusions because it represented the bank's most significant market in terms of deposit concentration, branch distribution, and reportable loans. As of June 30, 2020, deposits in these rating areas comprised 98.1 percent of LFBT's total deposits. Additionally, 88.9 percent of the bank's branches and 82.4 percent of reportable loan originations were generated in this state.

In evaluating the bank's performance under the Lending Test, we placed greater weight on the bank's distribution of small business loans than the distribution of home mortgage and consumer loans based on 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, unless other performance context factors indicate greater consideration should be given to demographics or aggregate performance. 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.

Other Performance

Product Innovation and Flexibility

This activity received positive consideration as it provided stabilization of small businesses and communities.

Paycheck Protection Program (PPP)

The bank made use of responsive, flexible lending during the COVID-19 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 1,094 PPP loans totaling \$440.5 million nationally.

Within the Chicago CSA, the bank originated 567 PPP loans totaling \$92.9 million and with a combined total of 821 PPP loans totaling \$201.5 million originated within the state of Illinois. In the Naples MSA, the bank originated 14 PPP loans totaling \$456,000 and with a combined total of 47 PPP loans totaling \$8.5 million originated within the state of Florida. This activity received positive consideration as it provided stabilization of small businesses and communities.

Small Business Loan Programs

The bank offers small businesses small and micro loans through its Easy Access Line of Credit (LOC) and Easy Access Installment programs. Small and micro business loans 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 receivable as well as support with secured and unsecured term loans. The bank originated 145 Easy Access LOCs totaling \$7.5 million and 32 Easy Access Installment loans totaling \$732,000.

The bank actively participates in SBA programs including the 504-loan program, 7a loan program, and the Express program. A total of 29 loans totaling \$30.3 million were originated under these programs.

Consumer Loan Programs

Money Smart Everyday Loan is offered as an alternative to payday loans. These loans provide more attractive unsecured financing from \$500 to \$2,500 than payday lenders with loans priced at an 8.25 annual percentage rate and up to 24-month repayment terms. During the evaluation period, the bank originated 77 loans totaling \$161,000.

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. The bank originated 19 loans totaling \$21,000.

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 a good responsiveness considering the bank’s primary product, market share, and high level of competition.
- The bank exhibits excellent geographic distribution and adequate borrower distribution, given the performance context.
- The bank is a leader in CD lending due to the volume of CD lending. The bank provides flexible lending options to help meet the community needs for small and micro business lending as well as offering a lending product as an alternative to payday lenders.
- The bank has an excellent level of qualified investments and exhibits excellent responsiveness to credit and community development needs.
- 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

LFBT designated one AA, 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.

LFBT has one AA which consists of 166 contiguous census tracts (CTs), 101 of which are in Lake County, Illinois and the remaining 65 in the adjacent northern Cook County, Illinois. The Illinois AA boundaries are the Illinois/Wisconsin state line border to the north, Highway 45 to the west, Lake Michigan to the east, and the southern boundaries of Wheeling, Northfield, and New Trier Townships to the south.

According to the June 30, 2020 Federal Deposit Insurance Corporation (FDIC) deposit market share report in the state of Illinois AA, LFBT had 0.7 percent market share making it the 19th largest deposit holder out of 466 financial institutions.

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 166 CTs, of which there are 12 low-income and 27 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)	166	7.2	16.3	18.7	55.4	2.4
Population by Geography	727,841	6.1	18.4	20.4	55.0	0.1
Housing Units by Geography	276,183	5.9	17.1	21.4	55.7	0.0
Owner-Occupied Units by Geography	189,038	2.9	11.9	20.3	64.9	0.0
Occupied Rental Units by Geography	69,217	12.4	28.9	24.9	33.8	0.0
Vacant Units by Geography	17,928	12.4	26.0	18.6	42.9	0.0
Businesses by Geography	68,553	2.0	10.3	17.4	70.3	0.0
Farms by Geography	1,099	4.2	17.0	23.3	55.5	0.0
Family Distribution by Income Level	187,114	18.1	14.2	16.1	51.6	0.0
Household Distribution by Income Level	258,255	20.6	13.6	15.3	50.5	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$352,267
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137	Median Gross Rent			\$1,184
			Families Below Poverty Level			6.7%
Source: 2015 ACS and 2020 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

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-to-moderate income (LMI) areas. The OCC also reviewed the Lake County, Illinois 2019 Annual Action Plan for Housing and Urban Development (HUD) Funding. Community contacts indicated that the following are identified needs within the bank’s AA.

- Flexibility in providing home improvement loans regardless of appraisal gaps,
- Willingness to accept a wide range of mortgage down payment and closing cost assistance,
- Providing financing to owners of multifamily buildings for acquisition and rehabilitation,
- Granting small loans to small businesses,
- Serving on the boards of these organizations,

- Providing financial education to LMI individuals and families,
- Providing student loan counseling,
- Providing debt management counseling,
- Participating in homebuyer counseling programs, and
- Having Spanish speaking bankers.

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

For the state of Illinois, we completed a full-scope review of the Chicago CSA. The Chicago CSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Therefore, ratings for the state of Illinois are based on results of the full-scope area.

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 due to the higher percentages of owner-occupied housing units (OOHUs), and businesses.

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.

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

Lending Activity

Lending levels reflect a good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Chicago CSA	94	2,865	0	57	3,016	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	Community Development	Total	%State* Loans	%State Deposits
Chicago CSA	54,123	240,188	0	176,723	471,034	100.0	100.0

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

The bank's rank in small business lending is stronger than the ranking and market share for deposits. We considered the substantial volume of loans originated through a subsidiary for insurance premium financing in the analysis. The rank for home mortgage lending is weaker than the ranking for deposits and market share.

According to FDIC Deposit Market Share data as of June 30, 2020, LFBT had \$4.0 billion in deposits with a deposit market share of .98 percent. The bank ranked 15th in total deposits out of 108 banks in the AA.

According to 2019 peer mortgage data, LFBT ranked 84th of 406 home mortgage lenders, originating 37 loans with a market share of less than one percent. The top five mortgage lenders, which included national banks and large mortgage lenders, captured 32.1 percent of the market.

According to 2019 peer small business data, LFBT ranked eighth out of 202 lenders originating small business loans, originating 817 loans with a market share of 2.5 percent in the AA. The top five small business lenders were all large national banks and captured 67.1 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in its AA.

Home Mortgage Loans

The distribution of home mortgage loans to LMI geographies is excellent.

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 proportion of loans in LMI geographies exceeded both the percentage of owner-occupied housing units and the aggregate distribution.

Small Loans to Businesses

The distribution of home mortgage loans to LMI geographies is excellent.

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 proportion of small loans to businesses exceeds the percentage of businesses in LMI geographies and the aggregate distribution.

Consumer Loans

The distribution of consumer loans to LMI geographies is excellent.

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 proportion of loans in LMI geographies exceeded both the percentage of households in 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 home mortgage and small business 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 an adequate 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 to LMI borrowers is poor.

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 proportion of loans was significantly below both the percentage of low-income families and the aggregate distribution. The proportion of loans was significantly below both the percentage of moderate-income families and the aggregate distribution. LFBT refers a significant portion of its home mortgage requests to WM while retaining commercial multifamily property loans, and as such, income or revenue information is not required to be reported. Per Table P, 40.4 percent of the home mortgage loans have no income data. This context was considered in the analysis.

Small Loans to Businesses

The distribution of small loans to businesses by revenue is adequate.

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 proportion of loans was significantly below the proportion of small businesses and well below the aggregate distribution.

LFBT 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, 54.0 percent of the small business loans have no revenue data. Given this context, the performance under this criterion is considered adequate.

Consumer Loans

The distribution of consumer loans to LMI borrowers 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 proportion of loans exceeded both the percentage of low- and moderate-income households.

Community Development Lending

The institution is a leader in making CD loans. The level of CD lending has a significantly positive impact on the lending test conclusion for the Chicago CSA.

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.

The bank originated 57 CD loans totaling \$176.7 million, representing 36.4 percent of allocated tier 1 capital. The CD lending activity included 36 loans totaling \$127.0 million supporting affordable housing, ten loans totaling \$39.2 million supporting revitalization and stabilization, six loans totaling \$9.7 million supporting economic development, and five loans totaling \$835,000 supporting community services. Of the 57 CD loans, 22 totaling \$53.6 million are new originations and 35 totaling \$123.2 million are renewals. Additionally, of the 21 new originations, five totaling \$14.7 million are SBA PPP originations.

Noteworthy CD loans include:

- \$17.5 million loan to support the operations of an organization that provides affordable housing and meals to seniors where the majority are LMI.
- \$1.4 million loan to support affordable housing through the purchase 47 rental units that provide below market rents.
- \$1.1 million loan to support the operations of an organization that provides affordable housing via a 168-bed skilled nursing facility to seniors where the majority are LMI.
- A \$500,000 loan to support affordable housing to an organization that promotes affordable housing through the purchase and renovation of blighted properties while also creating jobs through its renovation efforts. The organization also provides down-payment assistance, home repair and improvements, as well as foreclosure preventions to LMI persons.

- A \$25,000 loan to support community services to an organization that provides services aimed at helping LMI persons improve their financial condition, such as an on-the-job training program for youth, as well as job placement and counseling services.

Statewide

CD lending in the broader statewide area of Illinois included 27 loans totaling \$52.9 million supporting affordable housing, seven loans totaling \$15.9 million benefiting revitalization and stabilization and one loan totaling \$600,000 benefiting community service. Of the 27, three totaling \$4.5 million are PPP originations.

Regional

CD lending in the broader regional area included one PPP loan totaling \$9.5 million supporting revitalization and stabilization.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Refer to Other Performance section of Scope of the Evaluation for the facts and data used to evaluate product innovation and flexibility.

INVESTMENT TEST

The bank’s performance under the Investment Test in the Chicago CSA is rated Outstanding.

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.

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	17	12,258	155	25,819	172	97.2	38,077	98.9	6	2,432
Regional	0	0	4	211	4	2.3	211	0.5	0	0
National	0	0	1	225	1	0.6	225	0.6	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.

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

Qualified investments totaled \$38.5 million, with current period investments of \$24.9 million, prior period investments of \$12.3 million, and qualified grants of \$1.3 million. Investments benefiting the AA during the evaluation represented 7.9 percent of allocated tier 1 capital. The bank also had \$2.4 million in unfunded commitments remaining at the end of the evaluation period. The unfunded commitments consisted of small business investment companies (SBICs) and other investment pools.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$12.3 million primarily comprised of school district and housing development bonds. Investments met community needs by supporting affordable housing, revitalization of LMI geographies, and economic development.

Examples of qualified investments in this AA include:

- \$4.0 million in Low-Income Housing Tax Credits (LIHTC) to provide affordable assisted housing for low-income individuals.
- \$3.0 million loan pool purchase to a nonprofit corporation to support financing for the acquisition, rehabilitation, and preservation of affordable rental housing.
- A \$500,000 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.

Grants made were to organizations providing affordable housing and educational opportunities for LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$389,847 in grants to an organization that provides college preparation courses to low-income households.
- \$266,000 to a nonprofit organization that provides private school scholarships to low-income students. The donation also qualifies for the Illinois Invest in Kids Scholarship Tax Credit Program.
- \$10,000 to an entity that provides rehabilitation loans to LMI single-family homeowners.

Regional

We also considered qualified investments that served a broader regional area, including neighboring states. LFBT provided \$216,661 in donations to a university that provides scholarships to first generation low-income students. This donation is part of a larger Wintrust-wide pledge to provide the university with \$5.5 million in donations over the course of ten years to support the scholarship fund.

National

We also considered qualified investments that served a national area. LFBT provided \$225,000 in a certificate of deposit to CDFI Bank in Texas.

SERVICE TEST

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

Based on a 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 institution'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	12.5	25	0	62.5	6.1	18.4	20.4	55.1

The bank has eight branches in the Chicago CSA, with one in a low-income geography and two in moderate-income geographies. The percentage of branches located in LMI geographies exceeds the percentage of population residing in LMI 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 and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies or to LMI individuals. There was one branch opened in the AA, in a moderate-income census tract during May 2019. The bank did not close any branches 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. LFBT has eight ATMs in the AA, of which three are deposit-taking ATMs in the LMI CTs of the AAs. 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. LFBT employees from various lines of business provided 2,738 hours during the evaluation period. They included serving on committees and board for organizations that promote affordable housing, community service, financial literacy, and economic development in the bank's AA.

Examples of some of these services:

- Five employees provided services to a nonprofit that fulfills its mission of charity in numerous ways including daycare to low-income families, elder abuse, and nutrition for low-income elderly individuals. The employees served as board members, volunteer financial literacy, and provide fund raising.
- An employee offers their financial expertise by serving on the board, on the Finance Committee, and as the Treasurer for an organization that serves as a relief agency that provides counseling in specialized areas to its LMI residents and area youth.
- An Employee serves as Treasurer for an organization that partners with individuals and organizations to provide adequate shelter for people in need. They form partnerships with concerned groups of people, community organizations, churches, and others. This organization then provides the structure, guidance, and technical support needed to build and repair houses for people in need located in LMI areas.

FDIC Money Smart Program

The mission of the program is to work with various lenders regarding financial management, banking services for small business, and credit reporting for small businesses. During the evaluation period, the bank conducted workshops totaling 120 hours serving approximately 1,157 attendees through the various FDIC Money Smart Financial modules to small business and LMI individuals in the AA.

Score Program

During the evaluation period, bank employees had 81 hours for presenting modules with covered topics related to finance, business management, time management, and business projections. These classes were attended by small business owners.

State of Florida

CRA rating for the State of Florida: Satisfactory
The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The bank exhibits an adequate geographic distribution and adequate borrower distribution, given the performance context.
- The bank has made an adequate level of CD loans that support revitalization and stabilization.
- The bank has an excellent level of qualified investments and exhibits excellent responsiveness to credit and community development needs.
- The bank service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AAs.

Description of Institution's Operations in the State of Florida

LFBT designated one AA which is the Naples-Marco Island MSA (Naples MSA) in the state of Florida. The Naples MSA consists of 56 CTs, all of which are located in Collier County, Florida.

The Naples Florida market is new since the last evaluation. LFBT opened the Naples branch in March 2019.

According to the June 30, 2020 Federal Deposit Insurance Corporation (FDIC) deposit market share report in the state of Florida, LFBT had less than 0.1 percent market share with \$77 million making it the 27th out of 33 financial institutions in that AA.

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 56 CTs, of which there are 2 low-income and 13 are moderate-income.

Naples MSA

Assessment Area: Naples MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	56	3.6	23.2	37.5	35.7	0.0
Population by Geography	250,852	1.5	29.2	43.4	25.9	0.0
Housing Units by Geography	149,118	1.2	23.0	39.9	35.9	0.0
Owner-Occupied Units by Geography	71,269	0.6	19.9	44.0	35.5	0.0

Occupied Rental Units by Geography	28,680	3.1	33.8	41.8	21.3	0.0
Vacant Units by Geography	49,169	1.0	21.2	32.8	45.1	0.0
Businesses by Geography	49,967	2.2	15.6	41.3	40.9	0.0
Farms by Geography	1,095	1.9	22.6	52.5	22.9	0.0
Family Distribution by Income Level	65,590	19.6	18.4	19.6	42.4	0.0
Household Distribution by Income Level	99,949	21.3	18.1	18.9	41.6	0.0
Median Family Income MSA - 34940 Naples-Marco Island, FL MSA	\$66,264	Median Housing Value			\$360,189	
		Median Gross Rent			\$1,094	
		Families Below Poverty Level			8.0%	
<i>Source: 2015 ACS Census and 2020 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Community Contacts

The OCC reviewed two recent community contacts in the AA conducted by another regulatory agency. One contact was with a nonprofit HUD approved housing counseling agency, and the other was with a consortium of banks that provide flexible financing for affordable housing and community development. Community contacts indicated the following are identified needs within the bank’s AA.

- Flexible financing for small businesses, community development projects, and new construction and rehab of affordable homes,
- Financing for construction and permanent loans for residential real estate,
- Mortgage down payment and closing cost assistance,
- Providing first time home buyers seminars, and
- Providing financial education to LMI individuals and families.

Scope of Evaluation in Florida

For the state of Florida, we completed a full-scope review of the Naples MSA. The Naples MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Therefore, ratings for the state of Florida are based on the results of this full-scope area.

The bank did not originate or purchase enough home mortgage loans, small loans to farms, or consumer loans during the evaluation period; therefore, we did not evaluate these products separately.

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.

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 due to the higher percentages of businesses. There are only two low-income CTs in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank’s performance under the Lending Test in Florida is rated Low Satisfactory.

Based on a full-scope review, the bank’s performance in the Naples MSA is adequate.

Lending Activity

Lending levels reflect an adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Naples MSA	3	631	0	2	636	100.0	100.0
Statewide	-	-	-	2	2	-	-

*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	Community Development	Total	%State*	%State Deposits
Naples MSA	\$ 1,021	\$ 17,301	\$ 0	\$ 1,542	\$19,864	100.0	100.0
Statewide	-	-	-	\$3,170	\$3,170	-	-

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

The bank’s market share and rank for small business lending is stronger than its market share and rank for deposits.

According to 2019 peer small business data, LFBT originated 344 loans for a market share of 2.4 percent and ranked ninth among the 128 reporting lenders. The top five lenders for small business lending control 61.6 percent of the market share.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Small Loans to Businesses

The distribution of small business loans to LMI geographies is adequate.

Refer to Table Q in the state of Florida 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 proportion of loans in low-income geographies exceed both the percentage of businesses in these geographies and the aggregate distribution. The proportion of loans in the moderate-income geographies was well below the percentage of businesses in these geographies and below the aggregate distribution.

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 home mortgage and small business 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 an adequate distribution of loans to business of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

The distribution of small loans to businesses by revenue is adequate.

Refer to Table R in the state of Florida 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 proportion of bank loans to businesses with annual revenues of \$1 million or less was significantly below both the proportion of small businesses and the aggregate distribution. LFBT originates a substantial volume of loans through a subsidiary for insurance premium financing, which is a nationwide product that is underwritten without the collection of revenue data. Per Table R, 97.3 percent of LFBT's small business loans have no revenue data. Given this context, the performance under this criterion is considered adequate.

Community Development Lending

The institution made an adequate level of CD loans. The level of CD lending has a neutral impact on the lending test conclusion for the Naples MSA.

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.

LFBT has an adequate level of CD loans in the Naples MSA that were responsive to community needs. During the evaluation, LFBT originated one CD loan totaling \$1.5 million. This loan financed the renovation of a vacant building in a low-income CT. The renovation will help revitalize and stabilize this low-income area by providing space for new businesses and jobs.

Statewide

CD lending in the broader statewide area of Florida consisted of two PPP loans totaling \$3.2 million. These loans provided funding to two different businesses located in a moderate-income geography. The loans contributed to stabilization of these geographies by allowing the businesses to stay viable and retain 619 employees during the pandemic.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

Refer to the Other Performance section of Scope of the Evaluation for the facts and data used to evaluate product innovation and flexibility.

INVESTMENT TEST

The bank’s performance under the Investment Test in the Naples MSA is rated Outstanding.

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Naples MSA	0	0	3	28	3	100.0	28	100.0	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.

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

The bank exhibits good responsiveness to credit and community economic development needs. The bank does not use innovative or complex investments to support CD initiatives.

Qualified investments totaled \$28,000, with qualified grants of \$28,000. Investments benefiting the AA during the evaluation represented 0.3 percent of allocated tier 1 capital. There were no unfunded commitments at the end of the evaluation period. There were no prior period investments as the bank entered into this AA during the evaluation period.

Grants made were to organizations providing a variety of community services to support LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$25,000 in grants to an organization that is dedicated to improving the physical, emotional, and educational needs of LMI families, underprivileged, and at-risk children.
- \$3,000 in grants to an organization that provides a variety of social services including financial assistance, food programs, and housing/shelter.

SERVICE TEST

The bank’s performance under the Service Test in Florida is rated Low Satisfactory.

Based on a full-scope review, the bank’s performance in the Naples MSA is adequate considering the bank’s limited time in the market.

Retail Banking Services

Delivery systems are reasonably accessible to geographies and individuals of different income levels in its AAs.

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
Naples MSA	100.0	1	100.0	0	0	0	100.0	1.5	29.2	43.4	25.9

The bank has one branch in the Naples MSA, which is not in a LMI geography and is well below the percentage of population residing in LMI geographies.

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

To the extent changes have been made, the bank's opening of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies or to LMI individuals. In March 2019, the bank opened the branch in the AA.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as a deposit-taking ATM, direct deposit, telephone banking, mobile banking, and online banking. 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. The branch is closed on Saturdays.

Community Development Services

The bank provides a low level of CD services.

LFBT employees provided 88 hours during the evaluation period. They included serving on a board for organizations that promote economic development in the bank's AA.

Money Smart Program

The mission of the program is to work with various lenders regarding financial management, banking services for small businesses, and credit reporting for small businesses. During the evaluation period, the bank conducted workshops totaling 62 hours through the various Money Smart Modules 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
State of Illinois		
Chicago CSA	Full Scope	Partial Counties of Cook and Lake in Illinois
State of Florida		
Naples MSA*	Full Scope	Partial Collier County in Florida

* Entered the AA in 2019.

Appendix B: Summary of State Ratings

LAKE FOREST BANK & TRUST COMPANY, N.A RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank Rating
LFBT	Outstanding	Outstanding	High Satisfactory	Outstanding
State:				
State of Illinois	Outstanding	Outstanding	Outstanding	Outstanding
State of Florida	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory

(*) 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.

State of Illinois

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

Assessment 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	94	54,123	100.0	2.9	11.7	1.9	11.9	22.3	8.9	20.3	5.3	17.4	64.9	60.6	71.7	0.0	0.0	0.0
Total	94	54,123	100.0	2.9	11.7	1.9	11.9	22.3	8.9	20.3	5.3	17.4	64.9	60.6	71.7	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

Assessment 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	94	54,123	254.1	18.1	3.2	6.3	14.2	5.3	12.3	16.1	1.1	16.6	51.6	50.0	53.2	0.0	40.4	11.5
Total	94	54,123	254.1	18.1	3.2	6.3	14.2	5.3	12.3	16.1	1.1	16.6	51.6	50.0	53.2	0.0	40.4	11.5

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	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate
Chicago CSA	2,865	240,188	100.0	2.0	3.9	1.5	10.3	11.3	10.1	17.4	15.7	17.3	70.3	69.0	71.1	0.0	0.0	0.0
Total	2,865	240,188	100.0	2.0	3.9	1.5	10.3	11.3	10.1	17.4	15.7	17.3	70.3	69.0	71.1	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	2,865	240,188	100.0	29,039	85.6	26.3	44.0	6.3	19.8	8.1	54.0
Total	2,865	240,188	100.0	29,039	85.6	26.3	44.0	6.3	19.8	8.1	54.0

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

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	94	3,400	100.0	5.4	20.2	16.4	33.0	21.6	20.2	56.6	26.6	0.0	0.0
Total	94	3,400	100.0	5.4	20.2	16.4	33.0	21.6	20.2	56.6	26.6	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 Borrower 2018-2020

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 Loan	% of Households	% Bank Loans	% of Households	% Bank Loan	% of Households	% Bank Loans
Chicago CSA	94	3,400	100.0	20.6	51.1	13.6	14.9	15.3	8.5	50.5	18.1	0.0	7.4
Total	94	3,400	100.0	20.6	51.1	13.6	14.9	15.3	8.5	50.5	18.1	0.0	7.4

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

State of Florida

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2019-2020

Assessment 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
Naples MSA	3	1,021	100.0	10,831	0.6	0.0	1.0	19.9	66.7	22.7	44.0	0.0	49.9	35.5	33.3	26.4	0.0	0.0
Total	3	1,021	100.0	10,831	0.6	0.0	1.0	19.9	66.7	22.7	44.0	0.0	49.9	35.5	33.3	26.4	0.0	0.0

Source: 2015 ACS Census; 01/01/2019 - 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 2019-2020

Assessment 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
Naples MSA	3	1,021	100.0	19.6	33.3	3.9	18.4	0.0	15.0	19.6	0.0	18.4	42.4	66.7	50.4	0.0	0.0	12.2
Total	3	1,021	100.0	19.6	33.3	3.9	18.4	0.0	15.0	19.6	0.0	18.4	42.4	66.7	50.4	0.0	0.0	12.2

Source: 2015 ACS Census ; 01/01/2019 - 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 **2019-2020**

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
Naples MSA	631	17,301	100.0	2.2	6.3	2.4	15.6	8.9	12.6	41.3	39.0	44.3	40.9	45.8	40.7	0.0	0.0	0.0
Total	631	17,301	100.0	2.2	6.3	2.4	15.6	8.9	12.6	41.3	39.0	44.3	40.9	45.8	40.7	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2019 - 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 **2019-2020**

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
Naples MSA	631	17,301	100.0	11,275	92.2	1.9	44.9	2.8	0.8	5.0	97.3
Total	631	17,301	100.0	11,275	92.2	1.9	44.9	2.8	0.8	5.0	97.3

Source: 2020 D&B Data; 01/01/2019 - 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 2019-2020 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
Naples MSA	3	437	100.0	1.3	0.0	23.9	0.0	43.4	0.0	31.4	100.0	0.0	0.0
Total	3	437	100.0	1.3	0.0	23.9	0.0	43.4	0.0	31.4	100.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2019 - 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 2019-2020 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
Naples MSA	3	437	100.0	21.4	0.0	18.1	0.0	18.9	0.0	41.6	100.0	0.0	0.0
Total	3	437	100.0	21.4	0.0	18.1	0.0	18.9	0.0	41.6	100.0	0.0	0.0

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