



PUBLIC DISCLOSURE

April 10, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

North Shore Trust and Savings
Charter Number 700108
700 South Lewis Avenue
Waukegan, Illinois 60085

Office of the Comptroller of the Currency
Downers Grove Office
2001 Butterfield Road, Suite 400
Downers Grove, Illinois 60515

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

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Overall CRA Rating

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

The lending test is rated: Outstanding

The Lending Test is based on North Shore Trust & Savings's (North Shore or bank) performance in the State of Illinois. The major factors that support this rating include:

- North Shore's distribution of loans across geographies of different income levels within its assessment area (AA) is excellent.
- North Shore's distribution of loans to individuals of different income levels within its AA is excellent.
- North Shore has originated or purchased a majority of its loans within its AA.
- North Shore's loan-to-deposit (LTD) ratio is reasonable.
- North Shore did not receive any complaints regarding its CRA performance during the evaluation period.

Loan-to-Deposit Ratio

North Shore's LTD ratio is reasonable based on the bank's size and financial condition, and the credit needs of its AA. During the 12-quarter period ending December 31, 2021, the bank's quarterly LTD ratio averaged 51.5 percent and ranged from a low of 33.5 percent and an a high of 57.4 percent.

We compared North Shore's average quarterly LTD ratio to the LTD ratios of 35 similarly situated institutions headquartered in the Chicago-Naperville-Elgin IL-IN-WI metropolitan statistical area (MSA) that ranged in asset size from \$100 million to \$700 million. This group of similarly situated banks had an average quarterly LTD ratio of 78.3 percent. North Shore's average quarterly LTD ratio was the second lowest in this group.

Shortly after the evaluation period, North Shore completed its conversion from a mutual to a stock thrift. We noted the bank's total deposits increased significantly in 2021 leading up to the conversion, and lowered the bank's average quarterly LTD ratio. In addition, the bank sells a significant portion of the home mortgage loans that it originates to the secondary market. During the evaluation period, the bank sold 331 home mortgage loans totaling \$73.3 million. These sales also lower the bank's quarterly average LTD ratio.

Lending in Assessment Area

A majority of North Shore's loans are originated inside its AA. The bank originated or purchased 51.5 percent of its total loans inside its AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. The analysis only considered Home Mortgage Disclosure Act (HMDA) reported loans.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans					Dollar Amount of Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										
2019	68	61.3	43	38.7	111	15,970	56.2	12,432	43.8	28,402
2020	94	45.4	113	54.6	207	19,611	38.1	31,901	61.9	51,512
2021	92	52.6	83	47.4	175	17,747	42.1	24,442	57.9	42,189
Total	254	51.5	239	48.5	493	53,328	43.7	68,775	56.3	122,103
<i>Source: 2019, 2020, and 2021 HMDA LAR data. Evaluation Period: 01/01/2019 – 12/31/2021. Note: Due to rounding, totals may not equal 100.0%.</i>										

Description of Institution

North Shore is a \$339.8 million intrastate stock federal savings association in Waukegan, Illinois, which is wholly owned by North Shore Trust and Savings Bancorp, Inc. Due to a conversion from a mutual to a stock institution in January 2022, total assets experienced a notable increase during 2021 (leading up to the conversion). Tier 1 capital totaled \$44.3 million as of December 31, 2021. The bank's AA consists of Lake County, Illinois, which is in the Chicago-Naperville-Elgin IL-IN-WI MSA. The bank operates its main office and branch location in Waukegan, a branch location in Lindenhurst, and a loan production office in Chicago.

North Shore offers traditional loan products and deposit services. As of December 31, 2021, the bank's gross loans and leases totaled \$97.4 million and represented 28.7 percent of its total assets. One-to-four family residential mortgage loans were 89.4 percent of gross loans and leases. The bank also offers government-sponsored loans through the Federal Housing Administration and Department of Veteran Affairs, and aims to promote affordable home ownership in Waukegan and surrounding Lake County by focusing on local mortgage lending through the aforementioned government-sponsored programs. As part of this strategy, the bank sells mortgage loans on the secondary market. There are no legal or financial factors impeding the bank's ability to meet credit needs. The bank received an "Outstanding" rating following its previous Community Reinvestment Act (CRA) performance evaluation, dated August 26, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated North Shore's CRA performance using Small Bank examination procedures, which assess the bank's record of meeting the credit needs of its AA through lending activities. The evaluation period for the review is from January 1, 2019, through December 31, 2021.

Based upon our review of loans originated or purchased during the evaluation period, North Shore's primary lending product is home mortgage loans. To evaluate the bank's lending performance, we utilized

all Home Mortgage Disclosure Act (HMDA) data reported by the bank for 2019, 2020, and 2021. We previously determined that this data was reliable for use in this CRA evaluation.

Selection of Areas for Full-Scope Review

North Shore has one AA, and we completed a full scope review of this AA.

Ratings

North Shore's overall rating is based on the full-scope review of its performance within the state of Illinois.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, 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 Illinois¹: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- North Shore's distribution of home mortgage loans across geographies of different income levels within its AA is excellent.
- North Shore's distribution of home mortgage loans to individuals of different income levels within its AA is excellent.
- North Shore originated or purchased a majority of home mortgage loans within its AA.
- North Shore's LTD ratio is reasonable.
- North Shore did not receive any complaints regarding its CRA performance during the evaluation period.

Description of Institution's Operations in Illinois

North Shore has one AA that consists of 154 census tracts (CT) within Lake County, including 12 low-income and 30 moderate-income CTs. The bank's headquarters is located in a low-income CT, with the Waukegan branch located in a moderate-income CT and the Lindenhurst branch located in an upper-income CT. Lake County is in the Lake County-Kenosha County IL-WI metropolitan division, which is part of the Chicago-Naperville-Elgin IL-IN-WI MSA. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

Competition

North Shore faces strong competition from local, regional, and national institutions for loans and deposits in the Lake County AA. During 2021, there were 563 distinct lenders that originated or purchased a total of \$13.1 billion in home mortgages in Lake County. North Shore ranked 79th among these mortgage lenders with a 0.21 percent market share based on its dollar amount of loans, and a 0.14 percent market share based on its number of loans. According to the June 30, 2021, FDIC Market Share Report, North Shore had \$187.7 million in deposits from within the AA, which represents 100 percent of the bank's total deposits. The bank ranked 22nd among 32 FDIC-insured institutions for deposits, with a 0.6 percent deposit market share in Lake County. The banks with the largest deposit market shares in the AA were JP Morgan Chase Bank, Lake Forest Bank & Trust, First Midwest Bank, and Barrington Bank & Trust, which held a

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

combined 50 percent of all deposits in the AA. These banks are significantly larger in total assets than North Shore.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate in Lake County peaked in April 2020, near the beginning of the COVID-19 Pandemic. Unemployment in the AA has since improved and was lower than the state and national averages as December 31, 2021.

Annual Unemployment Rates				
Area	2019	2020	2021	Peak
Lake County	5.4%	8.2%	5.3%	14.2%
State of Illinois	4.0%	9.2%	6.1%	17.7%
National	3.7%	8.1%	5.5%	14.7%

Source: U.S. Department of Labor, Bureau of Labor Statistics. Rates are not seasonally adjusted. Unemployment rates are as of December 31 of each year. Peak is as of March 1, 2023.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lake County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	154	7.8	19.5	29.9	40.9	1.9
Population by Geography	702,898	6.3	20.6	34.5	38.5	0.1
Housing Units by Geography	261,229	6.2	19.1	36.1	38.6	0.0
Owner-Occupied Units by Geography	179,785	3.0	14.5	36.3	46.1	0.0
Occupied Rental Units by Geography	62,641	13.6	29.6	36.1	20.7	0.0
Vacant Units by Geography	18,803	11.8	27.3	34.5	26.4	0.0
Businesses by Geography	61,179	2.7	11.4	30.8	55.0	0.0
Farms by Geography	1,433	3.5	19.3	35.5	41.7	0.0
Family Distribution by Income Level	179,321	20.4	16.3	18.4	44.9	0.0
Household Distribution by Income Level	242,426	21.8	15.1	17.0	46.1	0.0
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137	Median Housing Value			\$277,581
Families Below Poverty Level		7.4%	Median Gross Rent			\$1,122

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

Lake County is north of Chicago, Illinois. Primary industries in the county include manufacturing, professional services, government, and health and education services. The largest employers in the AA include Abbvie Inc., Naval Station – Great Lakes, Baxter Healthcare Corp., and Walgreens Boot Alliance.

According to the 2015 American Community Survey (ACS) data, home ownership is more limited in

low-to-moderate income (LMI) geographies, and only 17.5 percent of the AA's owner-occupied housing units are located in low- and moderate-income CTs. While 7.4 percent of families are below the poverty line, 45.2 percent of these families live within the low- and moderate-income CTs.

Community Contacts

For the purposes of this performance evaluation, the OCC conducted a new community contact interview and referenced two recent community contacts performed in conjunction with other banks' CRA examinations. Community contacts included individuals representing a non-profit organization, a community service organization, and a government department (all focusing on community development within the Lake County AA). According to the contacts, needs in the AA include affordable housing, financial literacy, debt counseling, workforce development, revitalization/stabilization of low- and moderate-income areas, and economic development. Overall, the contacts stated that banks in the AA are helping to meet the identified needs, but that there are additional opportunities available. One contact mentioned the need for more services being offered in Spanish. Housing supply was impacted during the COVID-19 pandemic, with a population shift from the city of Chicago to the surrounding suburbs.

Scope of Evaluation in Illinois

North Shore has one AA in the State of Illinois, and we completed a full-scope review of that AA.

LENDING TEST

North Shore's performance under the Lending Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, North Shore's performance in the State of Illinois is excellent.

Distribution of Loans by Income Level of the Geography

North Shore's distribution of loans to geographies of different income levels in the state of Illinois is excellent. We reviewed summary reports and maps to analyze the bank's lending activity over the evaluation period and did not identify any unexplained conspicuous gaps in the geographic distribution of loans.

Home Mortgage Loans

Refer to Table O in appendix D for the facts and data used to evaluate the geographic distribution of North Shore's home mortgage loans.

North Shore's geographic distribution of home mortgage loans within its AA is excellent. The bank's percentage of home mortgage loans originated in low-income CTs in the AA significantly exceeded both the percentage of the AA's owner-occupied housing units that are located in the low-income CTs and the percentage of aggregate lending that occurred in the low-income CTs. The bank's percentage of home mortgage loans originated in moderate-income CTs in the AA was near the percentage of the AA's owner-occupied housing units that are located in the moderate-income CTs and significantly exceeded the percentage of aggregate lending that occurred in the moderate-income CTs.

Distribution of Loans by Income Level of the Borrower

North Shore's distribution of loans to individuals of different income levels is excellent, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in appendix D for the facts and data used to evaluate the borrower distribution of North Shore's originations of home mortgage loans.

North Shore's distribution of home mortgage loans to individuals of different income levels within its AA is excellent. While the percentage of home mortgage loans originated to low-income borrowers was significantly below the percentage of AA families that are low-income, it significantly exceeded the percentage of aggregate lending that occurred to low-income borrowers. The percentage of home mortgage loans to moderate-income borrowers significantly exceeded both the percentage of AA families that are moderate-income and the percentage of aggregate lending that occurred to moderate-income borrowers.

According to the 2015 American Community Survey (ACS) data, 29.7 percent of families in the low-income CTs have incomes below the poverty level. In addition, the median age of housing units in the low-income CTs is 66 years. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. These factors add to the overall cost of homeownership and can have a negative impact on home affordability for low- and moderate-income individuals.

Responses to Complaints

North Shore did not receive any complaints regarding its CRA performance during the evaluation period.

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:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home Mortgage Loans	
Affiliate(s):	Affiliate Relationship:	Products Reviewed:
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination:		
Rating and Assessment Areas	Type of Exam:	Other Information:
States:		
Illinois	Full-Scope	The AA is Lake County, which is within the Chicago-Naperville-Elgin IL-IN-WI MSA

Appendix B: Summary of MMSA and State Ratings

RATINGS - North Shore Trust and Savings	
Overall Bank:	Lending Test Rating:
North Shore Trust and Savings	Outstanding
State:	
Illinois	Outstanding

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	# of Bank Loans	Bank Loans \$(000s)	% of Bank Total	Overall Market	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending		
Lake County	254	53,328	100.0	44,344	3.0	7.5	1.7	14.5	14.2	10.5	36.3	50.8	34.9	46.1	27.6	52.8	0.0	0.0	0.0		

Source: 2015 ACS; 2019,2020, and 2021 HMDA LAR data, 2021 HMDA aggregate data, 01/01/2019 – 12/31/2021 bank data.
Note: Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	# of Bank Loans	Bank Loans \$(000s)	% of Bank Total	Overall Market	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending		
Lake County	254	53,328	100.0	44,344	20.4	12.6	9.0	16.3	24.8	16.0	18.4	23.6	19.3	44.9	31.5	41.5	0.0	7.5	14.1		

Source: 2015 ACS; 2019,2020, and 2021 HMDA LAR data, 2021 HMDA aggregate data., 01/01/2019 – 12/31/2021 bank data.
Note: Due to rounding, totals may not equal 100.0%.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.