



## **PUBLIC DISCLOSURE**

June 2, 2025

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

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

70 North Williams Street  
Crystal Lake, IL 60014

Office of the Comptroller of the Currency

Midsize and Trust 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 **Crystal Lake Bank & Trust Company, National Association (CLBT or Bank)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Crystal Lake Bank and Trust Company, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			
Low Satisfactory			X
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 excellent borrower and geographical distribution of loans. The bank was a leader in providing community development (CD) loans. The bank made extensive use of innovative and flexible loans to serve its assessment area (AA).
- The Investment Test rating is based on the bank having an excellent level of qualified CD investments and grants. Bank CD investments were responsive to community credit needs.
- The Service Test rating is based on service delivery systems that were reasonably accessible to geographies and individuals of different income levels in the bank's AA. The bank was a leader in providing CD services.

### Lending in Assessment Area

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

During the evaluation period, the bank originated and purchased 4.0 percent of its total loans within its AAs. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates, which may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area								2021 - 2024				
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)		
	Inside		Outside			Inside		Outside				
	#	%	#	%		\$	%	\$	%			
Home Mortgage	97	35.8	174	64.2	271	31,382	17.2	150,672	82.8	182,054		
Small Business	1,247	3.6	33,854	96.4	35,101	109,056	7.4	1,370,220	92.6	1,479,276		
Consumer	83	61.9	51	38.1	134	6,301	40.5	9,266	59.5	15,567		
<b>Total</b>	<b>1,427</b>	<b>4.0</b>	<b>34,079</b>	<b>96.0</b>	<b>35,506</b>	<b>146,739</b>	<b>8.8</b>	<b>1,530,158</b>	<b>91.2</b>	<b>1,676,897</b>		

Source: 1/1/2021- 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%

The bank's use of nationwide lending programs, First Insurance Funding (FIRST) and Wintrust Mortgage (WM), impacts the ratio of loans located inside the bank's AA. Small business loans are the bank's primary loan product based on volume of loans by number. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography.

## Description of Institution

Crystal Lake Bank & Trust (CLBT or the bank) is a \$1.8 billion intrastate bank headquartered in Crystal Lake, Illinois. CLBT is a wholly-owned subsidiary of Wintrust Financial Corporate (WTFC). As of December 31, 2024, WTFC is a \$64.9 billion financial services holding company located in Rosemont, Illinois. WTFC's business strategy includes working with customers in Chicago and northern Illinois, southern Wisconsin, western Michigan, northwest Indiana, and southwest Florida through their 16 wholly-owned banking subsidiaries and more than 200 bank locations.

WTFC locations provide a wide range of lending products and services to their customers. WTFC residential mortgage applications are referred to WM. WM, a division of Barrington Bank and Trust, is a national residential mortgage operation with offices throughout the United States. WM offers a wide variety of retail mortgages and originates nearly all WTFC mortgages. Loans that cannot be sold on the secondary market are purchased by any one of the 16 WTFC banks for their portfolio.

WTFC provides niche lending products across the nation within their community banks. These specialty products include wealth management advisory services, leasing financing, insurance premium financing through FIRST, short-term account receivable financing, administrative services outsourcing, franchise lending, firm partnership loans, and financial solutions for mission-based organizations.

As of December 31, 2024, CLBT reported total loans of \$1.4 billion, representing 78.6 percent of total assets. The primary loan products include approximately \$568.7 million of commercial loans or 40.5 percent of total loans, \$282.2 million of nonfarm nonresidential properties or 20.1 percent of total loans, and \$235.0 million of consumer loans or 16.7 percent of total loans. CLBT had tier 1 capital of \$176.1 million.

CLBT has one rating area, Illinois, and one AA, which consists of a portion of the McHenry County. The AA is located in the Chicago-Naperville-Elgin, IL-IN Metropolitan Statistical Area (MSA). The bank operates five full-service branches and one limited service drive up facility. During the evaluation period, CLBT opened one deposit-taking stand-alone Automated Teller Machine (ATM) in a moderate-income census tract (CT) in Crystal Lake, increasing the total deposit-taking ATMs to seven.

There were no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period. There were no acquisitions or mergers during the evaluation period that would have affected the bank's CRA performance or the OCC's analysis. CLBT's CRA performance was rated "Satisfactory" in the last PE dated August 2, 2021.

# Scope of the Evaluation

## Evaluation Period/Products Evaluated

The evaluation period for all Lending Test, Investment Test, and Service Test activities is January 1, 2021, through December 31, 2024.

For the Lending Test, geographical and borrower distribution of loans conclusions will be analyzed and concluded upon using two different data sets due to changes in the U.S. Census. Activity that occurred in 2021 will rely on data for comparisons to bank performance using the 2015 U.S. Census American Community Survey. Activity that occurred in 2022 through 2024 will rely on data for comparisons to bank performance using the 2020 U.S. Census.

To be considered a primary loan product for this evaluation, the bank must have originated at least 20 loans in an AA, during the evaluation period. For this evaluation we will review home mortgage loans, small loans to business, and consumer loans. The bank did not originate enough small farm loans during the evaluation period to be considered a primary product. Multifamily loans meeting the CD definition were evaluated as part of CD lending. See “Scope of the Evaluation” section in the Illinois rating for details on weighting of the bank loan products.

## Selection of Areas for Full-Scope Review

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

## Ratings

The bank’s overall rating is a blend of the state rating, and where applicable, multistate ratings.

The state rating in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the combination of conclusions in those AAs. Refer to the “Scope” section under each MMSA and State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

In evaluating the bank’s performance under the Lending Test, we placed greater weight on the bank’s distribution of small business loans based on the volume. The distribution of home mortgage loans and consumer loans received less weight due to the volume. Greater emphasis is given to lending by borrower income level as there were no low- and/or moderate- income (LMI) CT in the bank’s AA in 2021 and only moderate-income tracts in its AA during 2022-2024.

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

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks 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 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

<b>CRA rating for the State of Illinois:</b>	<b>Outstanding</b>
<b>The Lending Test is rated:</b>	<b>Outstanding</b>
<b>The Investment Test is rated:</b>	<b>Outstanding</b>
<b>The Service Test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans.
- The bank exhibited good distribution of loans among individuals of different income levels and business of different sizes.
- The bank was a leader in making CD loans which had a positive impact on the rating. CLBT made extensive use of innovative and/or flexible lending practices to serve AA credit needs.
- The institution had an excellent level of qualified investments and grants.
- Service delivery systems were reasonably accessible to geographies and individuals of different income.
- The bank was a leader in providing CD services.

### Description of Institution's Operations in Illinois

CLBT has one delineated AA in Illinois, which is comprised of portions of the McHenry County. The McHenry County is part of the Chicago-Naperville-Elgin, IL-IN MSA (Chicago MSA). The bank branches serve all CTs located in Algonquin (Cary Grove), McHenry (McHenry), and Nunda (Crystal Lake) Township, as well as the majority of the CTs in the Grafton Township (Algonquin). As of December 31, 2024, CBLT operated all six branch locations and seven deposit-taking ATMs in McHenry County, Illinois.

The bank's AA consists of 45 contiguous CTs out of the 64 tracts in McHenry County, Illinois. The 2020 U.S. Census increased the number of tracts by seven within the boundaries of the AA. In 2021, there were no low and/or moderate CT however, moderate-income tracts were added to the AA during the 2022-2024 portion of the evaluation period. The AA meets regulatory requirements and does not arbitrarily exclude any LMI geographies.

According to the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) deposit market share report, CLBT had 0.2 percent market share making it the 51<sup>st</sup> largest deposit holder out of 411 financial institutions in Illinois. The five largest competitors in the state are JP Morgan Chase Bank, BMO Bank, Bank of America, CIBC Bank USA, and the Northern Trust Company. The top five competitors'

deposits represent 50.6 percent of total deposit market share. CLBT holds 15.1 percent of the McHenry County deposit market share, ranking it the largest deposit holder out of 26 financial institutions.

## Market Profile

Based on the February 2025 Moody's Analytics report, the Chicago-Naperville-Elgin, IL-IN MSA's economy is in recovery. Payroll employment remained stagnant. The dip in payroll employment from third quarter to fourth quarter of 2024 offsets the growth, resulting in steady level of total jobs when comparing year over year. The area's economy driven by healthcare and government industries, which have grown consistently, while growth in other major industries have been flat at best. Housing market progress is minimal as single-family house prices are rising faster than national-level and other major markets. The area is a major center for business, distribution, transportation, and finance. Other strengths include having a large talent pool, strong roster of well-regarded educational institutions, and a growing high-tech center in the River North neighborhood. Weaknesses of the area include state and local budget pressures, weak population trends, and a high crime rate. The top five employers in the area are the federal, state, and local government, Amazon.com Inc., Advocate Health Care System, Northwestern Memorial Healthcare, and University of Chicago. The Moody's Analytics report projects that the area's economy will make slow progress in the short-term as the logistics and finance industries progresses but may be impacted by trade policies. In the long term, Moody's Analytics projects the area will underperform due to population loss and weak public finances.

According to the U.S. Bureau of Labor Statistics, the unemployment rate in the McHenry County was 4.0 percent as of December 2024, compared to its peak at 5.3 percent in June 2024. The McHenry unemployment rate as of December 2024 is lower than the Chicago-Naperville-Elgin, IL-IN MSA unemployment rate of 5.2 percent and statewide unemployment rate of 5.0 percent.

## Affordability

Based on data from the U.S. Census, low-income families within the Chicago-Naperville-Elgin, IL-IN MSA earned less than \$3,859 monthly and moderate-income families earned less than \$6,175 monthly. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculates to a maximum monthly mortgage payment of \$1,158 for low-income borrowers and \$1,852 for moderate-income borrowers. Assuming a 30-year mortgage with a six percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home located at the Chicago MSA median housing value would be \$1,648. LMI borrowers would be challenged to afford a mortgage loan in this AA.

## Community Contacts

The OCC reviewed information from three community contacts made within the AA during the evaluation period to determine community needs. The community contacts were with three nonprofits that have a focus on providing services in the bank's delineated AA. The community contacts included an economic development nonprofit, a Chicagoland nonprofit housing agency, and a regional Illinois nonprofit focused on housing issues and financial literacy. Primary community needs include improving availability of affordable housing, first time homebuyer programs and downpayment assistance, and access to flexible credit for small businesses and LMI communities.

## Chicago MSA

Assessment Area(s) - Chicago MSA							
2022 - 2024							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
<b>Geographies (Census Tracts)</b>	45	0.00	13.33	35.56	51.11	0.00	
<b>Population by Geography</b>	220,322	0.00	10.48	36.25	53.27	0.00	
<b>Housing Units by Geography</b>	83,769	0.00	11.78	38.11	50.11	0.00	
<b>Owner-Occupied Housing by Geography</b>	65,504	0.00	9.00	37.78	53.22	0.00	
<b>Occupied Rental Units by Geography</b>	14,519	0.00	24.12	38.37	37.51	0.00	
<b>Vacant Units by Geography</b>	3,746	0.00	12.68	42.79	44.53	0.00	
<b>Businesses by Geography</b>	7,185	0.00	10.98	37.22	51.80	0.00	
<b>Farms by Geography</b>	232	0.00	10.34	35.78	53.88	0.00	
<b>Family Distribution by Income Level</b>	60,363	13.54	15.98	21.25	49.23	0.00	
<b>Household Distribution by Income Level</b>	80,023	15.08	13.44	18.19	53.28	0.00	
<b>Unemployment rate (%)</b>	3.26	0.00	2.77	3.02	3.53	0.00	
<b>Households Below Poverty Level (%)</b>	5.38	0.00	10.42	6.16	3.61	0.00	
<b>Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)</b>	\$92,622			<b>Median Housing Value</b>	\$239,600		
<b>Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2024</b>	\$109,800			<b>Median Gross Rent</b>	\$1,359		
				<b>Families Below Poverty Level</b>	3.89		
FFIEC File - 2020 Census							
FFIEC File - 2024 Census							
2024 Dun & Bradstreet SBSF Demographics							
Due to rounding, totals may not equal 100.0%							
(*) The NA category consists of geographies that have not been assigned an income classification							

Assessment Area(s) - Chicago MSA 2021							
2021							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
<b>Geographies (Census Tracts)</b>	38	0.00	0.00	39.47	60.53	0.00	
<b>Population by Geography</b>	220,442	0.00	0.00	36.33	63.67	0.00	
<b>Housing Units by Geography</b>	82,676	0.00	0.00	38.88	61.12	0.00	
<b>Owner-Occupied Housing by Geography</b>	64,515	0.00	0.00	35.17	64.83	0.00	
<b>Occupied Rental Units by Geography</b>	13,520	0.00	0.00	54.78	45.22	0.00	
<b>Vacant Units by Geography</b>	4,641	0.00	0.00	44.15	55.85	0.00	
<b>Businesses by Geography</b>	8,795	0.00	0.00	32.47	67.53	0.00	
<b>Farms by Geography</b>	309	0.00	0.00	33.33	66.67	0.00	
<b>Family Distribution by Income Level</b>	59,153	12.26	14.09	20.70	52.96	0.00	
<b>Household Distribution by Income Level</b>	78,035	14.28	11.93	17.59	56.20	0.00	
<b>Unemployment rate (%)</b>	7.77	0.00	0.00	9.18	6.94	0.00	
<b>Households Below Poverty Level (%)</b>	5.77	0.00	0.00	7.74	4.53	0.00	
<b>Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)</b>	\$75,024			<b>Median Housing Value</b>	\$211,000		
<b>Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2021</b>	\$87,100			<b>Median Gross Rent</b>	\$1,203		
				<b>Families Below Poverty Level</b>	4.59		
FFIEC File - 2010 Census							
2021 Dun & Bradstreet SBSF Demographics							
Due to rounding, totals may not equal 100.0%							
(*) The NA category consists of geographies that have not been assigned an income classification							

## Scope of Evaluation in Illinois

We conducted a full-scope review of the bank's only AA, the Chicago MSA.

For the Lending Test, we gave significantly more weight to performance relative to small business lending. We gave more weight to small business lending because it comprises the 87.4 percent of the Home Mortgage Disclosure Act (HMDA), small business, and consumer reportable loan originations. The bank did not originate a sufficient number of small farm loans during the evaluation period for them to be considered a primary loan product. As a result, they were not included in the analysis or tables in appendix D.

An analysis was not performed on the geographic distribution of loans by income level in 2021 as the bank's AA does not include LMI CTs. Therefore, this would not provide for a meaningful analysis. For 2022 through 20204, the geographic distribution of loans conclusions was based solely on performance in moderate-income CTs, as there were no low-income CTs.

The bank did not originate enough home mortgage loans in 2021 to be considered a primary loan product. Both the geographic and borrower distribution of home mortgage loans conclusions are based off performance in 2022 through 2024.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope, the bank's performance in the Chicago MSA was excellent.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity								2021-2024
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Chicago MSA	97	1,247	0	30	83	1,457	100.0	0.0
<b>Total</b>	<b>97</b>	<b>1,247</b>	<b>0</b>	<b>30</b>	<b>83</b>	<b>1,457</b>	<b>100.0</b>	<b>0.0</b>
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Chicago MSA	31,382	109,056	0	65,142	6,301	211,881	100.0	0.0
<b>Total</b>	<b>31,382</b>	<b>109,056</b>	<b>0</b>	<b>65,142</b>	<b>6,301</b>	<b>211,881</b>	<b>100.0</b>	<b>0.0</b>

Source: 1/1/2021-12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%.

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

According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$1.5 billion in deposits, which was equivalent to a 15.1 percent market share. The bank's deposit market share ranked first out of 26 deposit taking institutions in the AA.

According to 2024 peer HMDA data, the bank originated 25 HMDA-reportable loans totaling \$6.9 million. This represented a 0.4 percent share of HMDA loan market within the AA. The bank's market share of HMDA originations was significantly weaker than its deposit market share. Among 314 HMDA lenders in the AA, the bank ranked 53<sup>rd</sup>, placing it in the top 16.9 percent of all lenders. The bank's market share ranking of HMDA originations, relative to all lenders, was significantly weaker than its deposit market share ranking, relative to all deposit taking institutions.

According to 2024 peer small business data, the bank made 155 small loans to businesses, which was equivalent to a 3.8 percent market. The bank's market share of small loans to businesses was significantly below its deposit market share. The bank's market share ranking of small loans to businesses ranked seventh out of 83 small business loan originators in the AA. The bank's market share ranked in the top 8.3 percent of all lenders in the AA. The bank's market share ranking, relative to all lenders, was weaker than its deposit market share ranking, relative to all deposit taking institutions.

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

The bank exhibited an excellent geographic distribution of loans in its AA.

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

Refer to Table 7 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 geographic distribution of home mortgage loans was excellent. The portion of bank home mortgage loans to moderate-income geographies exceeded both the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loan to those geographies.

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

Refer to Table 9 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 geographic distribution of small loans to businesses was excellent. The proportion of bank small loans to businesses in moderate-income geographies exceeded both the percentage of business and the aggregate industry distribution of small loans to those geographies.

### ***Consumer Loans***

Refer to Table 13 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 geographic distribution of consumer loans was excellent. The proportion of bank consumer loans in moderate-income geographies exceeded the percentage of households in those geographies.

## ***Lending Gap Analysis***

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

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

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

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

Refer to Table 8 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 borrower distribution of home mortgage loans was excellent. The proportion of bank home mortgage loans to low-income borrowers exceeded both the percentage of low-income families and the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of bank home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and was below the aggregate industry distribution of home mortgage loans to those borrowers.

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

Refer to Table 10 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 borrower distribution of small loans to businesses is good. The proportion of bank loans to businesses with revenues less than \$1 million was below the percentage of businesses and exceeded the aggregate industry distribution of loans to those businesses.

The bank originates a substantial volume of loans through a subsidiary for insurance premium financing, which is a nationwide product and are underwritten without the collections of revenue data. Given this context, the performance under this criterion is considered good.

Performance in 2021 was consistent with performance in 2022 through 2024.

### ***Consumer Loans***

Refer to Table 14 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.

When evaluating performance for consumer loans, we considered the fact the bank did not collect revenue information.

The borrower distribution of consumer loans was adequate. The proportion of bank loans to LMI borrowers was significantly below both the percentage of households and the aggregate industry distribution of loans to those borrowers.

Performance in 2021 was consistent with performance in 2022 through 2024.

## **Community Development Lending**

The institution was a leader in making CD loans. CD loans had a positive impact on the Lending Test Conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 30 CD loans totaling \$65.1 million in the AA which represented 37 percent of the tier 1 capital. CD loans primarily supported affordable housing. By dollar volume, 94.1 percent funded affordable housing, 3.1 percent funded economic development, and 2.9 percent funded community services targeted to LMI individuals. The bank originated two loans totaling \$10 million to support a Low-Income Housing Tax Credit (LIHTC) project for the construction of a 50-unit multifamily property in the AA. LIHTC loans are considered complex due to their unique structure, multiple funding sources and extensive compliance requirements.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank originated two loans totaling \$60.1 million to support acquisition of a site and the construction of nine multifamily buildings each consisting of 30 units, with 162 affordable housing units available for LMI individuals and families in the AA with rents offered below HUD Fair Market Rents.
- The bank originated two loans totaling \$10 million to support the construction of a 50-unit multifamily property. The property will be restricted with affordable housing units subject to income restrictions of 30 percent area median income (AMI) for 16 units, 50 percent AMI for 14 units, and 80 percent AMI for 20 units under the Section 42 LIHTC program. Eight of the units will be further layered with Section 8 project-based subsidy.
- The bank originated a \$300,000 working capital line of credit to a nonprofit organization that provides services including support for individuals who have a diagnosis of autism, early intervention services for infants or toddlers with development challenges, and those with mental health diagnosis. The organization primarily services LMI individuals with disabilities.

## **Broader Statewide and Regional Community Development Lending**

CD lending in the broader statewide area of Illinois included 20 CD loans totaling \$34 million. Of these, three loans totaling \$21 million supported revitalize and stabilize efforts of the LMI geographies, eight loans totaling \$10.1 million funded economic development, and nine loans totaling \$2.9 million funded affordable housing.

## **Product Innovation and Flexibility**

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

### Paycheck Protection Program (PPP) Loans

Due to the exigent circumstances related to the Covid-19 pandemic, the bank originated loans under the Small Business Administration (SBA) PPP. Banks were not required to collect revenue information as part of the underwriting process for PPP loans. When evaluating borrower distribution of small loans to businesses we considered the fact that 36.3 percent of the small loans to businesses the bank originated within the AA in the 2021 analysis period were PPP loans that did not have revenue information.

CLBT demonstrated use of responsive, flexible lending during the COVID-19 pandemic by originating loans to stabilize small businesses and communities under the PPP which ended May 31, 2021. During the evaluation period, the bank originated 212 PPP loans totaling \$29.4 million nationally.

### Wintrust Community Bank Down Payment Program (Wintrust DPP)

The Wintrust DPP is a downpayment program and closing cost assistance program for LMI homebuyers. The assistance provided is in the form of a \$2,000 grant paid on behalf of the borrower at the time the borrower close on their first mortgage financing for a home purchase and is fully forgiven at closing. Borrowers must have annual household income at or below 80% of HUD median income where the property is located. During the evaluation period, the bank originated 16 loans to LMI borrowers in the bank's AA.

### Money Smart Everyday Loan

Money Smart Everyday Loan is offered as an alternative to payday loans. These loans provide unsecured small dollar financing up to \$5,000 with relaxed credit guidelines that focus on the borrower's most recent 12-month credit history. The rate offered is lower than payday loans or credit card interest with terms of 12 or 24 months with no fees. During the evaluation period, the bank originated 29 loans totaling \$65,519 in the AA.

### Money Smart Certificate of Deposit Secured Loan

Money Smart Certificate of Deposit Secured Loan is offered to assist persons with very low credit scores and to those with non-established or blemished credit histories. The loan is secured by a certificate of deposit that grows as the loan is repaid in monthly installments. After payoff, customers receive use of the money from the certificate of deposit and reporting of credit history. During the evaluation period, the bank originated 13 loans totaling \$58,247 in the AA.

### Easy Access Line of Credit (LOC) and Easy Access Installment Loan

Easy Access Line of Credit (LOC) and Easy Access programs are small and micro loans offered to small businesses, which are a noted need in the community. These programs are targeted to help meet the needs of small businesses with revenues of less than \$1.0 million with short-term LOC funding to support inventory and accounts receivables as well as support through secured and unsecured term loans. During the evaluation period, the bank originated 565 loans totaling \$20.7 million in the AA.

## SBA Programs

The bank participates in SBA programs including the 504-loan program, 7a loan program, and the Express program. During the evaluation period, the bank originated 23 loans totaling \$10.9 million in the AA.

## INVESTMENT TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited excellent responsiveness to credit and community development needs. The institution made extensive use of innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$ (000's)	#	\$ (000's)	#	% of Total #	\$ (000's)	% of Total \$	#	\$ (000's)
Chicago MSA	14	4,980	250	16,616	264	92.6	21,596	81.3	0	0
Broader Statewide or Regional Area	2	1,110	15	2,945	17	6.0	4,055	15.3	1	536
National	0	0	4	910	4	1.4	910	3.4	0	0
<b>Total</b>	<b>16</b>	<b>6,090</b>	<b>269</b>	<b>20,471</b>	<b>285</b>	<b>100.0</b>	<b>26,561</b>	<b>100.0</b>	<b>1</b>	<b>536</b>

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

CLBT made \$16.6 million in qualified investments and grants, which represented 9.4 percent of tier 1 capital, within their AA. The bank reported total CD investments and donations of \$26.6 million, which included investments in their AA, broader statewide or regional area, and on the national level. In total, these investments and grants were equivalent to 15.1 percent of tier 1 capital. CLBT occasionally used innovative and complex investments to support CD initiatives.

The bank made 23 qualified CD investments, of which 95.6 percent benefitted economic development initiatives in the AA, while the remainder benefitted affordable housing. In total, current period investments totaled \$16.1 million. The volume of the current period CD investments benefitted affordable housing and economic development, with 52.7 percent and 47.3 percent, respectively. The bank made 227 CD grants totaling \$521 thousand. The bank's CD grants primarily benefitted community service and economic development, with 65.9 percent and 16 percent of the grant volume, respectively.

The following are examples of qualified investments in the AA:

- An \$8.5 million investment in a LIHTC fund that supported the development of a newly constructed 40-unit senior housing project located in the bank's AA. All units are restricted to

seniors (62+) earning 30, 50, or 60 percent of the area median income, with 10 units benefiting from project-based vouchers.

- A \$3.0 million investment in a tax credit equity fund supporting two Section 8 housing developments in the bank's AA. These developments provide affordable housing to both senior and LMI family households.
- \$4.1 million investment of Certificates of Deposit placed with several Community Development Financial Institutions (CDFIs) and Minority- and Women-Owned Depository Institutions. These investments provided additional liquidity for the institutions to extend credit and financial services in underserved and low-income communities.

## **Broader Statewide or Regional Area**

CLBT was responsive to community development needs and opportunities in its AA, examiners considered qualified investments made in the broader statewide or regional area. These investments did not have a specific mandate to serve the AA but were responsive to regional needs, particularly affordable housing and economic development initiatives benefiting LMI individuals and geographies.

### *Regional*

- CLBT made six qualified investments totaling approximately \$4.0 million, consisting of two investments totaling \$1.1 million in the prior evaluation period and four investments totaling \$2.9 million in the current evaluation period. Additionally, the bank had one unfunded commitment totaling \$536 thousand. These investments supported affordable housing, small business growth, and capital access for underserved communities across the greater Illinois and regional markets.
- The bank purchased a \$2.0 million affordable housing bond issued by a state housing agency to support homebuyer and down payment assistance programs for LMI borrowers across the state. A prior-period bond investment remained active with a current balance of \$78 thousand.
- The bank also held two equity investments in small business investment funds that facilitate financing for small and mid-sized businesses in regional markets. One of these investments had a current balance of \$464 thousand and included an unfunded commitment of \$536 thousand. The second investment, made in a prior period, had a current balance of \$1 million at the time of review.
- CLBT also maintained two certificates of deposit totaling \$451 thousand with a minority-owned financial institution serving LMI neighborhoods in the region. These deposits were used to fund affordable housing and community development lending initiatives.
- The bank made \$17.8 thousand in donations that supported affordable housing, community service, and revitalization initiatives within the greater Illinois region. These included \$2.9 thousand for affordable housing, \$12.8 thousand for community service, and \$2.1 thousand for neighborhood stabilization efforts.

### *National*

- CLBT made four qualified investments totaling \$910 thousand that supported community development initiatives benefiting LMI individuals and underserved communities across the country.

- CLBT invested \$225 thousand in a certificate of deposit with a certified CDFI. The investment supports the CDFI's mission to expand access to capital and financial services in low-income areas, including minority and underserved populations.
- CLBT invested a total of \$685 thousand across three certificates of deposit with a certified Minority Depository Institution (MDI) participating in the U.S. Treasury's Minority Bank Deposit Program. These deposits were made in September 2022, March 2023, and September 2023, supporting the MDI's ability to extend credit and financial services in minority and historically underserved communities nationwide.

## SERVICE TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago MSA was adequate.

#### Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Table 5: Distribution of Branch Delivery Systems										2022-2024				
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	NA	Low	Mod	Mid	Upp	NA	
Chicago MSA	100.0	6	100.0	0.0	0.0	50.0	50.0	0.0	0.0	10.5	36.3	53.3	0.0	
<b>Total</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>50.0</b>	<b>50.0</b>	<b>0.0</b>	<b>0.0</b>	<b>10.5</b>	<b>36.3</b>	<b>53.3</b>	<b>0.0</b>	

Source: FFIEC File – 2020 U.S. Census  
1/1/2021-12/31/2024 Bank Data  
Due to rounding, totals may not equal 100.0%

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

There are no low-income geographies in the AA. The branch distribution in moderate geographies was significantly below the percent of the population. Consideration was given to branches in middle-income CTs that serve customers from moderate-income geographies. The McHenry branch is located in a middle-income tract that is adjacent to a moderate-income tract (approximately 0.5 miles) and near a second moderate-income tract in the AA. Of the bank's 1,748 deposit accounts in moderate-income tracts, 879 (or 50 percent of total deposit accounts) are in adjacent or nearby moderate-income tracts relative to the branch location. Of the 879 deposit accounts in the two tracts, 519 (or 59 percent) are located in the moderate-income tract closest to the branch. The Crystal Lake branches are in a middle-income tract that are adjacent to three moderate-income tracts. The two branches can service the three moderate-income CTs which contain 37 percent (or 563 deposit accounts) of the bank's deposit accounts located in moderate-income tracts in the assessment area.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking. Each of CLBT's six branches offers a deposit-taking ATM at their branch locations. CLBT opened one deposit-taking stand-alone ATM within the AA, increasing the total deposit-taking ATMs to seven. Consideration was given for the new deposit-taking ATM placed in

a moderate-income tract during the evaluation period to further service the moderate-income area. The location is also adjacent to two additional moderate-income tracts.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. The bank offered traditional banking products and services at the branches located in the AA. The lobby hours, drive-up hours, and walk-up hours of the branches were Monday through Friday 9:00 a.m. to 5:00 p.m. with Saturday hours from 9:00 a.m. to 1:00 p.m.

## **Community Development Services**

This institution was a leader in providing CD services.

CD services were effective and responsive in helping the bank address community needs. Bank employees provided 2,211 service hours serving as board and committee members for organizations that aided in affordable housing, community services, and economic development for communities within the AA.

The following are examples of CD services provided in this AA:

- One bank employee provided 125 hours of board service to a Housing Authority. The purpose is to assist low-income individuals and families achieve economic independence by maintaining an affordable living environment. Long-term needs of the community are met through a variety of initiatives, such as dental care, energy efficiency programs, rental assistance, and home repair service.
- One bank employee provided 98 hours of board service and 37 hours of financial education to an organization that offers families and individuals transitional housing. Numerous programs are available, including case management, affordable housing and subsidized apartment programs, outreach and prevention services and tenant-based rental assistance.
- Two bank employees provided 95 hours of board services to a private, nonprofit charity that offers programs for people with behavioral health issues, developmental impairments, and homeless shelter needs. Additionally, this organization offers crisis counseling, sexual assault and prevention education and telephone crisis interventions. 99 percent of clients have low to moderate incomes and live within the AA.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	01/01/2021 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, consumer loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
State of Illinois		
Chicago MSA	Full Scope	Partial Census Tracts of McHenry County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Crystal Lake	Outstanding	Outstanding	Low Satisfactory	Outstanding
MMSA or State:				
Chicago MSA	Outstanding	Outstanding	Low Satisfactory	Outstanding

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

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2 of this title, and that is not an excluded transaction under 12 CFR 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 CD loans and qualified investments, branch distribution, and CD services).

**Low-Income:** Individual income that is at 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.

**Multistate Metropolitan Statistical Area (MMSA):** 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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

**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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

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

**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

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### 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/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

**Table 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.

**Table 9. 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 AA.

**Table 10. 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 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

**Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

**Table 13. 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 14. 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/AA.

Assessment Area:	2022 - 2024																		
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% 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 MSA	80	26,194	100.00	13,873	0	0	0	9.00	10.00	9.40	37.78	51.25	37.64	53.22	38.75	52.96	0	0	0
<b>Total</b>	<b>80</b>	<b>26,194</b>	<b>100.00</b>	<b>13,873</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>9.00</b>	<b>10.00</b>	<b>9.40</b>	<b>37.78</b>	<b>51.25</b>	<b>37.64</b>	<b>53.22</b>	<b>38.75</b>	<b>52.96</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "—" data not available.

Due to rounding, totals may not equal 100.0%

Assessment Area:	2021																		
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% 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 MSA 2021	17	5,188	100.00	16,712	0	0	0	0	0	0	35.17	35.29	33.33	64.83	64.71	66.67	0	0	0
<b>Total</b>	<b>17</b>	<b>5,188</b>	<b>100.00</b>	<b>16,712</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>35.17</b>	<b>35.29</b>	<b>33.33</b>	<b>64.83</b>	<b>64.71</b>	<b>66.67</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "—" data not available.

Due to rounding, totals may not equal 100.0%

Assessment Area:	2022 - 2024																		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Chicago MSA	80	26,194	100.00	13,873	13.54	13.75	8.66	15.98	17.50	24.63	21.25	15.00	25.93	49.23	31.25	27.47	0	22.50	13.31
<b>Total</b>	<b>80</b>	<b>26,194</b>	<b>100.00</b>	<b>13,873</b>	<b>13.54</b>	<b>13.75</b>	<b>8.66</b>	<b>15.98</b>	<b>17.50</b>	<b>24.63</b>	<b>21.25</b>	<b>15.00</b>	<b>25.93</b>	<b>49.23</b>	<b>31.25</b>	<b>27.47</b>	<b>0</b>	<b>22.50</b>	<b>13.31</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "—" data not available.

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Chicago MSA 2021	175,188	100.00	16,712	12.26	5.88	7.14	14.09	11.76	19.37	20.70	11.76	23.64	52.96	35.29	35.03	0	35.29	14.82	
<b>Total</b>	<b>175,188</b>	<b>100.00</b>	<b>16,712</b>	<b>12.26</b>	<b>5.88</b>	<b>7.14</b>	<b>14.09</b>	<b>11.76</b>	<b>19.37</b>	<b>20.70</b>	<b>11.76</b>	<b>23.64</b>	<b>52.96</b>	<b>35.29</b>	<b>35.03</b>	<b>0</b>	<b>35.29</b>	<b>14.82</b>	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2022 - 2024		
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Chicago MSA	861	76,050	100.00	11,207	0	0	0	10.98	13.70	11.39	37.22	30.31	32.46	51.80	55.98	56.14	0	0	0
<b>Total</b>	<b>861</b>	<b>76,050</b>	<b>100.00</b>	<b>11,207</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10.98</b>	<b>13.70</b>	<b>11.39</b>	<b>37.22</b>	<b>30.31</b>	<b>32.46</b>	<b>51.80</b>	<b>55.98</b>	<b>56.14</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn &amp; Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2021		
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Chicago MSA 2021	386	33,006	100.00	6,023	0	0	0	0	0	0	32.47	24.87	30.55	67.53	75.13	69.45	0	0	0
<b>Total</b>	<b>386</b>	<b>33,006</b>	<b>100.00</b>	<b>6,023</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>32.47</b>	<b>24.87</b>	<b>30.55</b>	<b>67.53</b>	<b>75.13</b>	<b>69.45</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn &amp; Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024	
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Chicago MSA	861	76,050	100.00	11,207	79.74	62.02	56.96	11.04	27.99	9.22	9.99	
<b>Total</b>	<b>861</b>	<b>76,050</b>	<b>100.00</b>	<b>11,207</b>	<b>79.74</b>	<b>62.02</b>	<b>56.96</b>	<b>11.04</b>	<b>27.99</b>	<b>9.22</b>	<b>9.99</b>	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021	
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Chicago MSA 2021	386	33,006	100.00	6,023	82.42	67.10	55.11	9.65	29.02	7.92	3.89	
<b>Total</b>	<b>386</b>	<b>33,006</b>	<b>100.00</b>	<b>6,023</b>	<b>82.42</b>	<b>67.10</b>	<b>55.11</b>	<b>9.65</b>	<b>29.02</b>	<b>7.92</b>	<b>3.89</b>	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography											2022 - 2024	
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	
Chicago MSA	54	3,910	100.00	0	0	11.74	18.52	37.89	33.33	50.37	48.15	0
<b>Total</b>	<b>54</b>	<b>3,910</b>	<b>100.00</b>	<b>0</b>	<b>0</b>	<b>11.74</b>	<b>18.52</b>	<b>37.89</b>	<b>33.33</b>	<b>50.37</b>	<b>48.15</b>	<b>0</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography											2021	
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	
Chicago MSA 2021	29	2,391	100.00	0	0	0	0	38.57	27.59	61.43	72.41	0
<b>Total</b>	<b>29</b>	<b>2,391</b>	<b>100.00</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>38.57</b>	<b>27.59</b>	<b>61.43</b>	<b>72.41</b>	<b>0</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower											2022 - 2024		
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago MSA	543,910	100.00	15.08	0	13.44	0	18.19	0	53.28	0	0	100.00	
<b>Total</b>	<b>543,910</b>	<b>100.00</b>	<b>15.08</b>	<b>0</b>	<b>13.44</b>	<b>0</b>	<b>18.19</b>	<b>0</b>	<b>53.28</b>	<b>0</b>	<b>0</b>	<b>100.00</b>	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower											2021		
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago MSA 2021	292,391	100.00	14.28	0	11.93	0	17.59	0	56.20	0	0	100.00	
<b>Total</b>	<b>292,391</b>	<b>100.00</b>	<b>14.28</b>	<b>0</b>	<b>11.93</b>	<b>0</b>	<b>17.59</b>	<b>0</b>	<b>56.20</b>	<b>0</b>	<b>0</b>	<b>100.00</b>	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, "--" data not available.

Due to rounding, totals may not equal 100.0%