



PUBLIC DISCLOSURE

July 21, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Libertyville Bank & Trust Company, National Association
Charter Number: 25197

507 North Milwaukee Avenue
Libertyville, IL 60048

Office of the Comptroller of the Currency

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

Performance Levels	Libertyville Bank & Trust Company, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on performance in the State of Illinois, which had an excellent geographical and good borrower distribution of loans. The bank's lending levels reflect adequate responsiveness to AA credit needs. The bank was a leader in making community development (CD) loans which had a positive impact on the Lending Test conclusion. The bank makes extensive use of innovative and flexible products to serve the credit needs of its assessment area (AA).
- The Investment Test rating is based on performance in the State of Illinois which reflects an excellent level of qualified CD investments and donations. CD investments were responsive to identified community needs.
- The Service Test rating is based on the performance in the State of Illinois which reflects service delivery systems that were reasonably accessible to geographies and individuals of different income levels. 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.

The bank originated and purchased 3.5 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										2022-2024		
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)		
	Inside		Outside			Inside		Outside				
	#	%	#	%		\$	%	\$	%			
Home Mortgage	106	34.8	199	65.2	305	44,688	16.9	219,678	83.1	264,366		
Small Business	1,189	3.3	35,358	96.7	36,547	179,614	11.3	1,407,941	88.7	1,587,555		
Total	1,295	3.5	35,557	96.5	36,852	224,302	12.1	1,627,619	87.9	1,851,921		

Source: 1/1/2022 - 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 (FIFCO) and Wintrust Mortgage (WM), impacts the ratio of loans located inside the bank's AAs. Small business loans are the bank's primary loan product based on the volume of loans by number. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography.

During the evaluation period, 110 home mortgage loans representing 55.3 of all such loans made outside of the AA were purchased from WM by Libertyville, as the loans were not salable in the secondary market. During the same evaluation period, 34,949 or 98.8 percent of small business loans made outside of the AA were purchased from FIFCO.

Description of Institution

Libertyville Bank and Trust Company, National Association (Libertyville or the bank) is an intrastate bank, headquartered in Libertyville, Illinois. As of December 31, 2024, Libertyville reported \$2.7 billion in total assets, \$2.3 billion in total deposits, and tier 1 capital of \$258.7 million. The bank is a wholly owned subsidiary of Wintrust Financial Corporation (WFC). WFC is a \$64.9 billion financial services holding company headquartered in Rosemont, Illinois. WFC owns 16 community bank subsidiaries operating in five states and seven non-bank subsidiaries. Libertyville operates seven branches, one satellite drive up facility, and nine automated teller machines (ATMs) in its Lake County assessment area.

WFC locations provide a wide range of lending products and services to their customers. WFC 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 WFC mortgages. Loans that cannot be sold on the secondary market are purchased by any one of the 16 WFC bank subsidiaries for their portfolio.

WFC also 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 FIFCO short-term account receivable financing, administrative services outsourcing, franchise lending, firm partnership loans, and financial solutions for mission-based organizations

Libertyville offers a full range of loan and deposit products and financial services for consumers and businesses. The bank delivers products and services through branches and alternative delivery systems such as ATMs, telephone banking, mobile application, and the bank's website.

Libertyville reported total loans of \$2.1 billion as of December 31, 2024, representing 78.9 percent of total assets. Total loans consisted of \$851.6 million in commercial loans (39.9 percent of total loans), \$422.2 million in nonresidential mortgage loans (19.8 percent of total loans), \$372 million in consumer loans (17.4 percent of total loans), \$172 million in multifamily loans (8.1 percent of total loans), \$168.9

million in home mortgage loans (7.9 percent of total loans), \$108.6 million in construction and land loans (5.1 percent of total loans), and \$41 million combined for all other loan types (1.9 percent of total loans).

There were no known legal, financial, or other factors that impeded the bank's abilities to help meet the credit needs in its AA. Libertyville was rated "Outstanding" in the prior CRA performance evaluation report dated April 25, 2022.

Innovative or Flexible Lending Products - The bank offers innovative and/or flexible loan products targeted to low and moderate-income (LMI) borrowers and small businesses that had a positive impact on the lending test rating. A summary of the bank's innovative and/or flexible loan products or programs are as follows:

- *Small Business Administration* – Federally guaranteed loan programs (*504, 7a, and Express*) to help provide financing to small businesses.
- *Easy Access Revolving Line of Credit* – Provides small businesses secured and unsecured financing up to \$250,000 to fund short-term cash needs. The product was designed to finance inventory growth and provide interim funding pending receipt of account receivables payments. Additionally, variable rate financing up to \$10,000 is available to support businesses that are less than one year old.
- *Easy Access Installment Loan* – Provides small businesses longer-term secured and unsecured financing up to \$250,000. This product was designed to finance the acquisition of fixed assets, debt refinancing, and terming out of existing lines of credit or credit card debt. The bank has established tiers within this product to accommodate a variety of business types and circumstances.
- *Small Business Overdraft Protection Line* – Provides small businesses short-term funding when experiencing cash flow constraints. No application, closing, or annual fees are charged for this product.
- *Money Smart Everyday Loan* – Provides an alternative to higher cost financing options, with a fixed interest rate of Prime plus 5 percent and loan terms of 12 or 24 months. Loan amounts range from \$500 to \$5,000, which represents an increase from \$2,500 during the evaluation period. No loan fees are charged for this product and applicant credit scores are not considered. Alternative credit history options such as payment history for rent, utilities, or cell phone are accepted to supplement traditional trade line information.
- *Money Smart Certificate of Deposit Secured Loan* – Provides a way to build or repair credit history with a loan whose proceeds are used to fund a certificate of deposit. Loan amounts range from \$500 to \$2,500. The loan earns the certificate of deposit's interest rate plus two hundred basis points. No loan fees are charged for this product. Applicants credit scores and credit histories are not considered.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is January 1, 2022, through December 31, 2024. The OCC evaluated the bank using large bank performance criteria, which includes a lending test, investment test, and service test. Under the lending test, home mortgage loans reported in compliance with the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA had two separate analysis periods due to the delineation revisions made to the Lake County, IL Metropolitan Division (MD) per Office of Management and Budget Bulletin No. 23-01. Loans originated or purchased from January 1, 2022, to December 31, 2023, were analyzed using 2020 U.S. Census data and loans originated or purchased from January 1, 2024, to December 31, 2024, were analyzed using 2024 U.S. Census data. The analysis period for CD loans, the investment test, and the service test was January 1, 2022, to December 31, 2024.

Lending Test

The OCC evaluated home mortgage loans and small loans to businesses under the Lending Test. The OCC determined that 20 loans originated or purchased within the AA is sufficient for analysis purposes. The OCC did not consider small loans to farms and consumer loans in this evaluation, as they did not constitute a substantial majority of the bank's business or management did not request consideration of that product category. No affiliate activity was included in this evaluation. The OCC generally gave equal weight to geographic and borrower distribution components of the Lending Test. When evaluating the geographic distribution of loans, the OCC gave greater weight to the bank's performance in moderate-income tracts given the limited number of owner-occupied housing units and businesses in the low-income tracts. When evaluating the distribution of home mortgage loans based on the income level of the borrower, the OCC considered the poverty level of the AA as well as any significant affordability barriers. The OCC also considered the volume of CD loans and the degree of responsiveness of those loans to the needs in the community. Lending activity responsiveness was assessed by comparing the bank's deposit market share and rank to the bank's market share and rank for each loan product.

Investment Test

When conducting analysis under the Investment Test, the OCC compared the dollar amount of CD investments and donations made to tier 1 capital. The analysis also included evaluating how responsive investments and donations were to the needs of the community and if there were any impediments to meeting those needs. The OCC considered the volume of investments made during the current evaluation period and those made in prior evaluation periods that remained outstanding. Investments made in a prior period were considered at the book value of the investment as of December 31, 2024. Current-period investments were considered at their original investment amount, even if that amount is greater than the current book value of the investment. Current-period investment totals are based on the amount used for bank reporting for financial statements and the Consolidated Reports of Condition and Income that governed the timing for recognizing investment totals. Unfunded commitments consist of legally binding investment commitments that are tracked and recorded in the bank's financial reporting system.

Service Test

The OCC gave primary consideration to the bank's performance in delivering retail products and

services to geographies and individuals of different income levels through the bank's distribution of branches. The OCC focused on the accessibility of branches to LMI geographies and individuals, including the impact of opening and closing of branches. Adjacent branches, which are branches in middle- or upper-income (MUI) census tracts within proximity of LMI geographies, that serve and enhance accessibility for LMI customers, were also considered. The OCC evaluated the range and consistency of products and services offered by the bank through its branch network with emphasis on accessibility to LMI borrowers. The OCC specifically focused on any differences in branch hours and services in LMI geographies compared to those in MUI geographies. The OCC also evaluated the bank's record of providing CD services. The OCC's primary consideration was the responsiveness of the services to community needs.

An adjacent branch was evaluated based on bank generated data. The data listed accounts opened during the evaluation period at the adjacent branch by customers residing in LMI geographies within the bank's AA. Libertyville used customer addresses as a proxy to determine LMI status. The OCC compared the percentage of accounts opened at the adjacent branch by customers residing in LMI geographies to the percentage of the population within LMI geographies.

While Libertyville offers multiple alternative delivery systems (ADS) commensurate with standard industry offerings, the OCC only considered those systems where usage data was provided for LMI individuals or individuals residing in LMI geographies. Access to conduct transactions at all community bank subsidiaries owned by WFC is an ADS available to Libertyville customers. The bank provided usage data of Libertyville customers during the evaluation at an WFC affiliate branch location in a low-income census tract within the AA. Libertyville used customer addresses as a proxy to determine LMI status. The OCC compared the percentage of transactions conducted at the affiliate branch by Libertyville customers residing in LMI geographies to the percentage of the population within LMI geographies.

During the evaluation period, Libertyville modified its Money Smart Checking account to qualify for Bank On certification. Features of the Money Smart Checking account include \$10 minimum deposit to open the account, no minimum balance requirement, no monthly maintenance fees, free debit card, digital banking access, and monthly reimbursement of the first six out-of-network ATM transaction fees.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (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 ratings, and where applicable, multistate ratings.

To determine the Lending Testing rating, small loans to businesses received greater weight than home mortgage loans based on the higher volume, by number, of small loans to businesses originated or purchased during the evaluation period (91.8 percent). Generally, equal weight is given to the geographic distribution of loans and lending by borrower income level. Greater weight was generally given to bank performance compared to aggregate lenders than to demographic data. Aggregate lender data for home mortgage and small loans to businesses was not available at the time of this evaluation. As a result, lending performance for January 1, 2024, to December 31, 2024, was solely compared to demographic data. While the analyses considered lending performance by both number and dollar volume of loans, emphasis was placed on the number of loans as it better reflects the number of individuals and businesses served. Additionally, the January 1, 2022, to December 31, 2023, analysis period received greater weight as it encompasses two years.

The state rating is based on performance in the AA. Refer to the “Scope” section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Other Information

Deposit Market Share – The OCC used summary deposit data reported to the FDIC as of June 30, 2024. This was the most recent public data available during the analysis periods.

Unemployment Rate – The unemployment rates referenced are the non-seasonally adjusted rates as published monthly by the U.S. Bureau of Labor Statistics.

FHFA House Price Index (FHFA HPI) – A comprehensive collection of publicly available house price indexes that measure changes in single-family home values. Examiners utilized the FHFA HPI to assess changes in home prices in the assessment area. The data used is non-seasonally adjusted.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) 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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Illinois

CRA rating for the State of Illinois: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The overall geographic distribution of originated and purchased home mortgage loans and small loans to businesses was excellent and borrower distribution was good.
- Lending levels reflect adequate responsiveness to AA credit needs when compared to the bank's deposit rank.
- The bank was a leader in making CD loans, which had a positive impact on the rating. The bank makes extensive use of innovative and/or flexible lending products to serve community credit needs.
- The bank made an excellent level of qualified investments and donations, exhibiting excellent responsiveness to community needs.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.
- The bank was a leader in providing CD services.

Description of Institution's Operations in the State of Illinois

Libertyville's AA consists of the entirety of Lake County in the Lake County, Illinois MD (Lake County MD). Lake County consists of 160 contiguous census tracts (CTs) including 13 low-income census tracts and 33 moderate-income census tracts. The AA met the requirements of the CRA and did not arbitrarily exclude any LMI geographies.

Lake County is situated in the northeastern corner of the state of Illinois, bordering Lake Michigan. The county is divided into eighteen townships, which are Antioch, Avon, Benton, Cuba, Ela, Fremont, Grant, Lake Villa, Libertyville, Moraine, Newport, Shields, Vernon, Warren, Wauconda, Waukegan, West Deerfield, and Zion.

Lake County MD

Assessment Area(s) - Lake County MD 2023								
2022 - 2023								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	160	5.63	18.75	33.75	39.38	2.50		
Population by Geography	714,342	4.64	19.52	35.18	39.08	1.58		
Housing Units by Geography	264,681	4.70	19.33	37.73	38.23	0.01		
Owner-Occupied Housing by Geography	182,892	2.41	14.54	37.11	45.94	0.00		
Occupied Rental Units by Geography	65,792	10.47	32.23	38.30	18.96	0.04		
Vacant Units by Geography	15,997	7.19	21.00	42.48	29.27	0.06		
Businesses by Geography	27,592	2.25	12.26	31.85	53.52	0.12		
Farms by Geography	868	2.88	18.89	37.33	40.78	0.12		
Family Distribution by Income Level	180,333	19.77	16.35	20.51	43.36	0.00		
Household Distribution by Income Level	248,684	22.82	14.89	17.19	45.10	0.00		
Unemployment rate (%)	5.21	12.23	6.59	5.41	3.83	0.11		
Households Below Poverty Level (%)	7.87	23.81	13.38	7.38	3.76	0.00		
Median Family Income (29404 - Lake County, IL MD)	\$105,876			Median Housing Value	\$238,950			
Median Family Income (29404 - Lake County, IL MD) for 2023	\$124,600			Median Gross Rent	\$1,254			
				Families Below Poverty Level	5.29			
FFIEC File - 2020 Census								
2023 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) - Lake County MD 2024								
2024								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	160	8.13	20.63	30.63	38.13	2.50		
Population by Geography	714,342	7.22	23.00	31.30	36.90	1.58		
Housing Units by Geography	264,681	7.81	22.86	33.12	36.20	0.01		
Owner-Occupied Housing by Geography	182,892	3.65	19.72	33.08	43.55	0.00		
Occupied Rental Units by Geography	65,792	18.47	31.32	32.50	17.68	0.04		
Vacant Units by Geography	15,997	11.58	23.95	36.16	28.26	0.06		
Businesses by Geography	26,939	3.65	15.80	29.20	51.23	0.13		
Farms by Geography	854	5.04	24.00	33.14	37.70	0.12		
Family Distribution by Income Level	180,333	21.44	17.24	20.83	40.49	0.00		
Household Distribution by Income Level	248,684	24.89	15.83	17.61	41.67	0.00		
Unemployment rate (%)	5.21	10.30	6.13	5.50	3.71	0.11		
Households Below Poverty Level (%)	7.87	23.18	11.13	6.73	3.72	0.00		
Median Family Income (29404 - Lake County, IL MD)	\$112,326			Median Housing Value	\$238,950			
Median Family Income (29404 - Lake County, IL MD) for 2024	\$129,600			Median Gross Rent	\$1,254			
				Families Below Poverty Level	5.29			
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								

Economic Data

According to data from the February 2025 Moody's Analytics report, Lake County's economy is lagging the state of Illinois with minimal employment growth, deterioration in the professional services and finance industries, and acceleration in the increase of single-family home prices. While the unemployment rate has slightly declined, strengthening of key white-collar industries is necessary for economic progress. Strengths of the area include large talent pool, high per capita income, limited

exposure to state budget crisis, and above-average credit quality. Weaknesses of the area include exposure to large-scale layoffs as firms move to downtown Chicago, declining population trends, and reliance on a few large firms. Top employers include Abbvie Inc., Naval Station Great Lakes, Baxter Healthcare Corp., Walgreens Boots Alliance, and Abbott Laboratories.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Lake County MD was 5.9 percent in January 2022 and 4.5 percent in December 2024, compared to the national unemployment rates of 4.0 percent and 4.1 percent, respectively.

The poverty level across the AA was considered in the evaluation of the bank's lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for home loans than those with income above the poverty rate. Within the Lake County MD, 5.3 percent of families had incomes below the Federal Poverty Level (FPL).

Housing Affordability Analysis

When assessing the bank's record of mortgage lending to LMI borrowers, examiners considered, as performance context, the relative affordability of housing within the Lake County MD by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for LMI borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Lake County MD, low-income borrowers would be challenged to afford a mortgage payment exceeding \$1,323 based on 2020 Census data, and \$1,404 based on 2024 Census data. Similarly, moderate-income borrowers would face difficulty affording payments above \$2,118 in 2020 and \$2,247 in 2024. Assuming a 30-year fixed rate mortgage at 6.0 percent, with no down payment, homeowner's insurance, real estate taxes, or other monthly expenses, the estimated monthly payment for a home priced at the median housing value in the Lake County MD would be approximately \$1,433. Based upon this estimated payment, low-income borrowers would be challenged to afford a median-priced home in the AA.

Examiners further considered the increase in home prices across the evaluation period. According to the FHFA HPI, home prices increased by 13.9 percent, 8.6 percent, and 7.7 percent in 2022, 2023, and 2024, respectively. This acceleration in home prices worsened existing affordability concerns in the Lake County MD.

Community Contacts

Examiners reviewed seven community contacts completed during the evaluation period with organizations serving the AA. These organizations focus on community services targeted to LMI individuals and revitalization and economic development in LMI areas. Community contacts indicated the following are needs within the bank's AA.

- Affordable housing
- Financial literacy classes
- Micro loans and credit building loan programs
- Small loans for small businesses
- Down payment assistance

Scope of Evaluation in the State of Illinois

Examiners conducted a full-scope review of the Lake County MD. The Lake County MD is the only AA in the rating area. Small loans to businesses were given more weight than home mortgage loans when arriving at the bank's overall lending performance rating based on the volume of loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Lake County MD was excellent.

Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs.

Table 3: Lending Activity					2022-2024
Number of Loans					
Assessment Area	Home Mortgage	Small Business	Community Development	Total	
Lake County MD	106	1,189	36	1,331	
Broader Statewide or Regional Area	0	0	13	13	
Total	106	1,189	49	1,344	
Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Community Development	Total	
Lake County MD	44,689	179,614	29,865	254,168	
Broader Statewide or Regional Area	0	0	27,501	27,501	
Total	44,689	179,614	57,366	281,669	

Source: 1/1/2022 - 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.

Lending levels reflect adequate responsiveness to AA credit needs when considering Libertyville's lending market rank as compared to its deposit market rank.

According to FDIC Market Share data as of June 30, 2024, Libertyville ranked fifth with a 7.1 percent deposit market share. The deposit market share rank and the level of competition in the AA places the bank in the top 16th percentile of depository institutions.

According to 2023 peer mortgage data, the bank had a market share of 0.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 80th among 440 home mortgage lenders in the AA, which placed it in the top eighteen percent of lenders. The top three lenders, with

combined market share of 14 percent, were Guaranteed Rate, Inc (5 percent), US Bank, N.A. (5 percent), and JP Morgan Chase Bank, NA (4 percent).

According to 2023 peer small business data, the bank had a market share of 2.0 percent based on the number of small loans to businesses originated or purchased. The bank ranked 8th among 117 small business lenders in the AA, which placed it in the top 7 percent of lenders. The top three lenders, with combined market share of 61.5 percent, were JP Morgan Chase Bank, NA (33.1 percent), American Express National Bank (20.4 percent), and Citibank, N.A. (8 percent).

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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

2022-2023

The bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

2024

The bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied homes in those geographies. The percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied homes in 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

2022-2023

The bank's percentage of small loans to businesses in low and moderate-income geographies exceeded both the percentage of business in those geographies and the aggregate distribution of loans.

2024

The bank's percentage of small loans to businesses in low-income geographies approximated the percentage of businesses in those geographies. The percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in those geographies.

Lending Gap Analysis

Examiners did not identify any unexplained conspicuous lending gaps. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

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 and farms 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

2022-2023

The bank's percentage of home mortgage loans to low-income borrowers was near to the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and was below aggregate distribution of loans.

2024

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families.

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.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

2022-2023

The bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less, but near to the aggregate distribution of small loans to businesses.

2024

The bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less.

Community Development Lending

The institution was a leader in making CD loans.

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 36 CD loans totaling \$29.9 million, which represented 11.5 percent of tier 1 capital. By dollar volume, 60.3 percent funded affordable housing, 36.3 percent funded economic development, and 3.4 percent funded community service efforts.

Examples of CD loans include:

- The bank participated \$8 million into a \$10.8 million loan to fund the development of a 34-unit mixed use apartment building for seniors. The building will contain accessible one- and two-bedroom apartment units, along with community spaces, such as a fitness room, computer center, and library. The new offices of an affordable housing community development organization will occupy the first floor of the building, serving as a regional hub for affordable housing services. The bank also made a \$1 million investment supporting the development.
- The bank renewed annually during the evaluation period a \$200,000 revolving line of credit to a community development organization that provides short- and long-term housing for homeless women and their children. The organization also provides counseling, employment coaching, financial education, life-skills training, and assistance with substance abuse recovery. The organization operates two 10-bed shelters and a single-family transitional residence. Additionally, the bank made four donations totaling \$16,250 to this organization and provided 191 hours of financial literacy training.
- The bank originated a \$712,500 loan to finance the purchase a multifamily building that consists of eight two-bedroom units. Rental rates for the units range from \$965 to \$1,050, which is below 30 percent of 80 percent of the area median income.

CD Loans in Broader Statewide or Regional Area - The bank originated 13 CD loans totaling \$27.5 million in the broader statewide area of Illinois. By dollar volume, 73 percent funded economic development and 27 percent funded affordable housing. These loans supported the development and retention of 115 affordable housing units. Additionally, 75 jobs were created, and 254 jobs were retained as result of these loans.

Product Innovation and Flexibility

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

As shown in the table below, a total of 410 loans in the amount of \$25.3 million were funded under the following innovative and/or flexible lending programs. Refer to the comments in the “*Innovative or Flexible Lending Products*” section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
Small Business Administration Loans	24	\$13,145
Easy Access Revolving Line of Credit	197	\$11,075
Easy Access Installment Loan	6	\$249
Easy Access Overdraft Protection Line	142	\$710
Money Smart Everyday Loan	35	\$92
Money Smart Certificate of Deposit Secured Loan	6	\$3
Total	410	\$25,274

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 Lake County MD was excellent.

The institution had an excellent level of qualified investments and donations, although rarely 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 occasionally used 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)
Lake County MD	13	9,379	213	24,167	226	83.7	33,546	90.0	0	0
Regional	2	2,180	38	617	40	14.8	2,797	7.5	2	1,320
National	0	0	4	910	4	1.5	910	2.4	0	0
Total	15	11,559	255	25,694	270	100.0	37,253	100.0	2	1,320

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

The dollar volume of current- and prior-period investments represented 12.9 percent of allocated tier 1 capital. Qualified investments totaled \$33.5 million, including current period investments totaling \$23.4 million, prior period investments totaling \$9.4 million, and 179 qualified donations totaling \$732,006.

Current and prior period investments, and donations were responsive to the community needs. By dollar volume, 44.3 percent supported economic development, 30.5 percent supported community services, 18.7 percent supported affordable housing, and 6.6 percent supported rehabilitation and stabilization in the AA.

Examples of CD investments include:

- The bank made a \$1.5 million low-income housing tax credit fund (LIHTC) investment to fund the development of 50 affordable housing units in a moderate-income tract. The units will be rented to households earning up to 30 percent, 50 percent, and 60 percent of area median income (AMI). Under the U.S. Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration program, 38 units will convert to project-based rental assistance and 12 units will benefit from project-based vouchers under HUD's section 18 program.
- The bank invested \$2.5 million in a mortgage-backed security that is secured by a skilled nursing facility located in a low-income census tract. Approximately 85 percent of the facility's residents are LMI and utilize Medicaid.
- The bank invested \$4.3 million in a mutual fund collateralized by mortgage loans to 16 LMI borrowers. The average income of the borrowers was 56 percent of AMI and seven of the collateral properties are in LMI census tracts.

CD Investments in Broader Regional and National Areas – The bank made 42 investments and donations totaling \$1.5 million in broader regional and national areas that did not serve a purpose, mandate, or function to serve the bank's AA. By dollar volume, 96.1 percent supported economic development and 3.7 percent supported affordable housing. Less than one percent of investments and donations made in broader regional and national areas supported community services and funded rehabilitation and stabilization efforts.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Lake County MD was good.

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											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
Lake County MD	100.0	7	100.0	0.0	42.9	14.2	42.9	0	7.2	23.0	31.3	36.9	1.6
Total	100.0	7	100.0	0.0	42.9	14.2	42.9	0	7.2	23.0	31.3	36.9	1.6

Source: FFIEC File – 2024 Census
1/1/2022 - 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.

The bank has no branches in low-income geographies. The percentage of the bank's branches in moderate income geographies exceeded the percentage of the population in those geographies. The OCC also considered an adjacent branch located in a middle-income census tract that served customers living in LMI geographies. According to bank data, of the 1,017 customers that opened accounts at the adjacent branch, 4.0 percent live in low-income geographies and 19.6 percent live in moderate-income geographies. This branch improved access to banking services and had a positive impact on the Service Test conclusion. Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

The bank had several ADS, including ATMs, telephone banking, online banking, remote deposit capture, and mobile banking options. The bank operated nine deposit-taking ATMs, 11.1 percent in a low-income geography and 33.3 percent in moderate-income geographies. The sole ATM in a low-income geography was opened during the evaluation period within an affordable housing development. These ADS had a neutral impact on the Service Test conclusion as no usage data was provided.

The OCC considered transactions conducted by Libertyville customers at an affiliate branch in a low-income geography in the AA. According to bank data, of the 247 transactions processed for Libertyville customers at the affiliate branch during the evaluation period, 15.4 percent were for customers living in low-income geographies and 40.9 percent were for customers living in moderate-income geographies. This branch improved access to banking services and had a positive impact on the Service Test conclusion.

Community Development Services

The institution was a leader in providing CD services.

CD services were effective and responsive in helping the bank address community needs. During the evaluation period, 13 bank employees spent 480 hours conducting 382 financial education events in coordination with 36 organizations. Bank employees utilized the Federal Deposit Insurance Corporation Money Smart financial education program to conduct the financial education events for both children and adults. Additionally, 25 bank employees spent 5,187 hours serving on boards and committees as well as providing technical expertise to 28 organizations that provide services to LMI individuals and families in the AA.

Examples of CD services include:

- Eight bank employees provided students with 3,727 hours of training on different roles and responsibilities in the bank, and professionalism in the workplace. The students are from LMI families and attend a college preparatory school where 83 percent of the students qualify for the free or reduced lunch program.
- Three bank employees provided 191 hours of financial education to homeless women receiving services from an organization in the AA. The organization provides housing and professional services to LMI women and children.
- A bank employee provided 316 hours of technical expertise serving as treasurer for a food pantry that provides emergency assistance to low-income families and the elderly.

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:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage and small business loans. Community development loans, qualified investments, and community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Illinois		
Lake County MD	Full-scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Libertyville Bank	Outstanding	Outstanding	High Satisfactory	Outstanding
MMSA or State:				
State of Illinois	Outstanding	Outstanding	High 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

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 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 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:	2022-2023																		
	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
Lake County MD	72	32,312	100	34,338	2.4	6.9	2.7	14.5	14.0	13.7	37.1	33.3	37.9	46.0	45.8	45.7	0	0	0
Total	72	32,312	100	34,338	2.4	6.9	2.7	14.5	14.0	13.7	37.1	33.3	37.9	46.0	45.8	45.7	0	0	0

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Assessment Area:	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
Lake County MD	34	12,377	100	0	3.7	8.8	0	19.7	32.3	0	33.0	26.5	0	43.6	32.4	0	0	0	0
Total	34	12,377	100	0	3.7	8.8	0	19.7	32.3	0	33.0	26.5	0	43.6	32.4	0	0	0	0

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

Due to rounding, totals may not equal 100.0%

Assessment Area:	2022-2023																		
	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
Lake County MD	72	32,312	100	34,338	19.8	16.7	12.3	16.3	13.9	20.7	20.5	9.72	19.6	43.4	22.2	32.6	0	37.5	14.8
Total	72	32,312	100	34,338	19.8	16.7	12.3	16.3	13.9	20.7	20.5	9.72	19.6	43.4	22.2	32.6	0	37.5	14.8

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 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																	2024		
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
Lake County MD	34	12,377	100	0	21.4	8.8	0	17.3	26.5	0	20.8	8.8	0	40.5	29.4	0	0	26.5	0
Total	34	12,377	100	0	21.4	8.8	0	17.3	26.5	0	20.8	8.8	0	40.5	29.4	0	0	26.5	0

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, -- 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																	2022-2023		
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
Lake County MD	788	116,929	100	39,987	2.3	2.8	2.1	12.3	13.4	10.0	31.8	36.2	31.4	53.5	47.6	56.5	0.1	0	0.01
Total	788	116,929	100	39,987	2.3	2.8	2.1	12.3	13.4	10.0	31.8	36.2	31.4	53.5	47.6	56.1	0.1	0	0.01

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 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																	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
Lake County MD	401	62,685	100	0	3.7	3.5	0	15.8	17.5	0	29.2	34.9	0	51.2	44.1	0	0.13	0	0
Total	401	62,685	100	0	3.7	3.5	0	15.8	17.5	0	29.2	34.9	0	51.2	44.1	0	0.13	0	0

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- 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																	2022-2023		
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	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Lake County MD	788	116,929	100	39,987	79.3	48.9	54.7	12.1			36.5			8.6			14.6		
Total	788	116,929	100	39,987	79.3	48.9	54.7	12.1			36.5			8.6			14.6		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- 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											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
Lake County MD	401	62,685	100	0	79.0	48.9	0	11.7	37.9	9.3	13.2
Total	401	62,685	100	0	79.0	48.9	0	11.7	37.9	9.3	13.2

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