



PUBLIC DISCLOSURE

May 4, 2020

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

INB, National Association
Charter Number (11443)

322 East Capitol Street
Springfield, Illinois 62701

Office of the Comptroller of the Currency

211 Fulton Street
Suite 604
Peoria, Illinois 61602

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.

Table of Contents

Overall CRA Rating.....2
Description of Institution.....3
Scope of the Evaluation.....4
Discriminatory or Other Illegal Credit Practices Review.....5
State Rating.....6
 State of Illinois.....6
Community Development Test 14
Appendix A: Scope of Examination.....A-1
Appendix B: Summary of MMSA and State Ratings.....B-1
Appendix C: Definitions and Common Abbreviations.....C-1
Appendix D: Tables of Performance Data.....D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on State of Illinois.
- The Community Development (CD) Test rating is based on State of Illinois.
- The overall borrower distribution is reasonable.
- The overall geographic distribution is reasonable.
- The bank exhibits adequate responsiveness to community development needs.
- A majority of the bank's loans are originated or purchased inside its assessment areas (AAs).
- The loan-to-deposit (LTD) ratio is reasonable.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable.

The quarterly average LTD ratio was 76.6 percent for the 18-quarter period between December 31, 2015, and March 31, 2020, with a low LTD ratio of 67.9 percent and a high of 86.6 percent.

INB ranked 9th of 10 similarly situated FDIC insured financial institutions that compete with the bank for deposits in the AAs. The comparable institutions ranged in size from \$474 million to \$4.0 billion and reported quarterly average LTD ratios from 72.7 percent to 98.0 percent. The LTD ratio is calculated on a bank-wide basis.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated and purchased 79.1 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	3,047	79.1	806	20.9	3,853	461,103	61.3	214,420	31.7	675,523
Small Business	21	84.0	4	16.0	25	2,245	76.8	680	23.2	2,925
Total	3,068	79.1	810	20.9	3,878	463,348	68.3	215,100	31.7	678,448

Source: HMDA data from January 1, 2017 to December 31, 2019. Random sample of business loans from January 1, 2017 to December 31, 2019.

Description of Institution

INB, National Association (INB or Bank) is an intrastate bank headquartered in Springfield, Illinois, with total assets of \$1.2 billion at March 31, 2020. The bank has a subsidiary, INB Park, LLC (INB Park), which holds the title to the bank parking deck north of the bank building. INB is wholly owned by Illinois National Bancorp, Inc. (INBI), a one bank holding company with \$1.2 billion in assets at March 31, 2020. Neither INBI or INB Park negatively affects the bank's ability to meet the credit needs of the community.

INB's mission is to partner with people and technology to provide diversified financial services within the community. Their vision is to help their customers minimize financial pressures and live better lives.

The CRA evaluation has one rating area for INB's six AAs in central and east-central Illinois.

The Springfield AA is comprised of all census tracts (CT) in Sangamon County, which is part of the Springfield metropolitan statistical area (MSA) and has eight branch locations. The Peoria AA includes CTs in the counties of Peoria, Tazewell, and Woodford, which are part of the Peoria MSA, and has one branch location. The Bloomington AA includes all CTs located in McLean County, which is part of the Bloomington MSA, and has one branch. The Champaign AA includes all CTs in the counties of Champaign and Piatt, which are part of the Champaign-Urbana MSA, and has one branch. The Danville AA includes all CTs in Vermillion County, which is part of the Danville MSA, and has one branch location. The IL NonMSA AA includes all CTs in Logan County and has one branch location.

The bank sources a majority of its deposits, or 88.6 percent, from the Springfield AA, as of June 30, 2019. The Peoria AA is the second largest source of deposits at 5.7 percent of deposits. The remaining AAs; Danville AA, Champaign AA, Bloomington AA, and IL Non MSA AA comprise the remaining 5.7 percent of bank deposits.

INB offers residential and business loan products in addition to agriculture and consumer loan products to its customers. The bank opened the Champaign AA branch location on April 9, 2018, and relocated the Bloomington AA branch location from an upper-income CT to a middle-income CT on April 27, 2017. Branch locations offer drive-thru services and an onsite ATM, except the Danville AA and Champaign AA. The Danville AA offers neither drive-thru or on-site ATM services; however, customers have access to a non-INB ATM at a local Casey's at no charge. The Champaign AA does not have drive-thru services. Nine of the 13 branches offer Saturday service, either through the lobby or the drive-thru. Customers have additional banking access through telephone, Internet, and mobile platforms.

Commercial loans represent the largest portfolio at \$718.0 million, followed by Residential at \$131.4 million, Agriculture at \$42.5 million, and Consumer at \$9.6 million, per call report data at March 31, 2020. INB originated or purchased over 6,700 loans totaling \$1.3 billion from January 1, 2017, through December 31, 2019, per bank data.

INB reported a net loans and leases to total asset ratio of 75.4 percent and a tier 1 leverage capital ratio of 9.0 percent, or \$105.2 million at March 31, 2020.

There are no legal or financial circumstances that impede the bank's ability to meet the credit needs of its AAs.

The previous CRA rating, which the OCC determined using the Intermediate Small Bank evaluation procedures, was Satisfactory, as detailed in the PE dated June 13, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period covers the period from the date of the previous CRA PE of June 13, 2016, through May 4, 2020. We evaluated INB under the Intermediate Small Bank evaluation procedures which includes a Lending Test and a Community Development Test.

The Lending Test evaluated loans originated or purchased between January 1, 2017, and December 31, 2019, and were compared to the 2015 American Community Survey Census Data. The Peoria and Bloomington AAs had separate analysis periods for 2017-2018 and 2019 due to changes in CT income level designations.

The Community Development Test evaluated eligible community development investments, loans, and services from the date of the prior CRA PE of June 13, 2016, to December 31, 2019. With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

The primary loan products for the evaluation were determined to be business and residential loans. These two products accounted for 94.5 percent of loans, by number, and 98.0 percent of loans, by dollar volume, from January 1, 2017, through December 31, 2019, per bank data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs 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) 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 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.

INB's six AAs are located within the State of Illinois.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Illinois

CRA rating for the State of Illinois¹: Satisfactory.

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The overall geographic distribution is reasonable. The geographic distribution of home mortgage loans is excellent. The geographic distribution of business is reasonable.
- The overall borrower distribution is reasonable. The borrower distribution of home mortgage loans is reasonable. The borrower distribution of small business loans is excellent.
- The bank exhibits adequate responsiveness to CD needs in the state.

Description of Institution's Operations in Illinois

INB serves its customers with 13 branches and 17 publicly available ATMs. Each AA contains at least one branch location, except for the Springfield AA, which contains eight branches. The bank opened the Champaign AA branch location on April 9, 2018, and relocated the Bloomington AA branch location from an upper-income CT to a middle-income CT on April 27, 2017. Branch locations offer drive-thru services and an onsite ATM, except the Danville AA and Champaign AA. The Danville AA offers neither drive-thru or on-site ATM services; however, customers have access to a non-INB ATM at a local Casey's at no charge. The Champaign AA does not have drive-thru services. Nine of the 13 branches offer Saturday service, either through the lobby or the drive-thru. Customers have additional banking access through telephone, Internet, and mobile platforms. One branch and four publicly available ATMs are located in moderate-income CTs in the Springfield AA.

In the Danville AA and NonMSA AA, there are no full-time on-site mortgage loan officers (MLOs) due to low demand for home mortgage applications. Applications for home mortgages from these limited-scope AAs are received by MLOs in neighboring AAs.

In 2019, INB was without a dedicated Small Business Administration (SBA) lender, which may have limited opportunities.

The local economy of Springfield is concentrated in state government and healthcare as the top three leading employers are the State of Illinois, Memorial Health System, and St. John's Hospital. The local economy of Peoria is concentrated in heavy machinery and healthcare with the top three leading employers being Caterpillar, OSF Saint Francis Medical Center, and Unity Point Health Methodist. The economies of the limited scope AAs include education, healthcare, manufacturing and finance/insurance.

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

The annual unemployment rate in the State of Illinois has been declining over the past three years. The unemployment rate was 4.9 percent in 2017, which then declined to 4.3 percent in 2018, and further declined to 4.0 percent in 2019. As of 2019, the 4.0 percent annual unemployment rate in the Springfield MSA is comparable to the State of Illinois. The Bloomington MSA (3.8 percent) and Champaign MSA (3.8 percent) are favorable to the State of Illinois, while the IL Non-MSA (4.3 percent), Danville MSA (5.1 percent), and Peoria MSA (4.7 percent) are unfavorable.

Competition for deposits is high among financial institutions. INB held the second highest deposit market share position at 13.1 percent in the Springfield AA among 26 FDIC insured financial institutions, at June 30, 2019. In the Peoria AA, INB held less than 1 percent of deposit market share and ranked 18th among 31 FDIC insured financial institutions. In the limited scope AAs, INB held less than 1 percent of deposit market share in the Bloomington and Champaign AA, 4.1 percent in the IL Non-MSA, and 1.6 percent in the Danville AA.

The Springfield AA includes 11 low-income CTs and 10 moderate-income CT's, as of 2019. The Peoria AA includes 13 low-income CTs and 14 moderate-income CTs, as of 2019.

Housing costs are generally affordable for moderate-income families when considering the median housing value but may present challenges for low-income families when also considering property tax rates in Illinois. Additionally, deteriorating housing quality in low- and moderate-income (LMI) areas, noted by community contacts, may limit opportunities for some borrowers due to cost for improvements.

We performed community contact interviews for each full-scope review.

In the Springfield AA, we contacted a representative of a local economic development group in Springfield, Illinois. The contact described the economic condition as stagnant/stable. Job growth had been stable but not growing, and the area has been experiencing population outflow.

The LMI areas are located in and around downtown Springfield and east to southeast along Interstate 55. There is little housing in downtown Springfield. The LMI areas present a challenge for lending due to the continued deteriorating housing quality, disinvestment, and relocation of jobs out of the area.

Affordable housing remains a need but there are challenges with profitability of these projects without assistance from tax credits. Small business support and microloans continue to be needs in the community. A microloan program had been attempted in the community but failed to materialize.

Community development opportunities are limited for the number of financial institutions competing in the area. Much of the affordable housing projects are controlled by the State of Illinois, and there are no community development financial institutions in the Springfield area.

The contact had no negative perceptions of INB.

In the Peoria AA, we contacted a representative of a local economic development group in Peoria, Illinois. The contact identified the economic condition as stable to declining in various parts of the Peoria MSA. The areas in the southern portion and around downtown Peoria were identified as more economically disadvantaged areas.

Peoria's economy is driven by the manufacturing and healthcare industries. The manufacturing industry is heavily driven by nationwide and global demand. The contact noted 2018 was a strong year for

growth in manufacturing; however, in 2019, demand began to slow and resulted in lay-offs. The healthcare industry remains strong in Peoria with the largest healthcare provider, OSF HealthCare expanding their headquarters in downtown Peoria.

The contact stated that opportunities for owner-occupied housing in low- and moderate-income CTs is challenging due to the deteriorating quality of the home inventory. Also, small businesses located in low- and moderate-income CTs have limited capital and do not necessarily qualify for traditional financing for capital. These factors contribute to challenges in lending to low- and moderate-income families and small businesses in low- and moderate-income CTs in Peoria AA.

The contact was unaware of any projects in need of funding at this time but did note there are various opportunities for community involvement and volunteering.

The contact mentioned that INB is a newer player in the Peoria area, with only one branch presence as opposed to the many other financial institutions in the area.

The contact had no negative perceptions of INB.

Springfield MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA 2017-2019, 2015 ACS Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	53	20.8	18.9	39.6	20.8	0.0
Population by Geography	199,016	15.9	14.6	40.8	28.7	0.0
Housing Units by Geography	90,433	16.3	16.9	40.0	26.8	0.0
Owner-Occupied Units by Geography	57,654	9.9	13.3	42.2	34.6	0.0
Occupied Rental Units by Geography	25,231	28.6	21.7	36.8	12.8	0.0
Vacant Units by Geography	7,548	24.2	28.7	33.9	13.2	0.0
Businesses by Geography	11,326	15.8	18.0	37.4	28.8	0.0
Farms by Geography	523	7.5	8.0	51.6	32.9	0.0
Family Distribution by Income Level	50,928	22.8	16.2	20.4	40.5	0.0
Household Distribution by Income Level	82,885	25.4	15.7	17.2	41.7	0.0
Median Family Income MSA - 44100 Springfield, IL MSA		\$73,402	Median Housing Value			\$126,507
			Median Gross Rent			\$737
			Families Below Poverty Level			10.8%
<i>Source: 2015 ACS and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Peoria MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Peoria 2019, 2015 ACS Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	16.2	17.6	40.5	25.7	0.0
Population by Geography	309,542	9.4	16.2	41.4	32.9	0.0
Housing Units by Geography	135,904	10.0	17.5	42.1	30.5	0.0
Owner-Occupied Units by Geography	86,600	4.5	15.8	44.4	35.3	0.0
Occupied Rental Units by Geography	38,513	18.6	20.3	39.5	21.6	0.0
Vacant Units by Geography	10,791	23.5	20.1	33.0	23.4	0.0
Businesses by Geography	16,732	12.8	14.1	39.2	33.9	0.0
Farms by Geography	666	3.0	7.4	39.6	50.0	0.0
Family Distribution by Income Level	80,131	21.6	17.6	20.6	40.1	0.0
Household Distribution by Income Level	125,113	24.1	16.3	18.0	41.6	0.0
Median Family Income MSA - 37900 Peoria, IL MSA		\$67,308	Median Housing Value			\$136,421
			Median Gross Rent			\$714
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS Census and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Information of the Assessment Area						
Assessment Area: Peoria 2017-2018, 2015 ACS Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	17.6	18.9	39.2	24.3	0.0
Population by Geography	309,542	10.1	18.3	40.5	31.1	0.0
Housing Units by Geography	135,904	10.6	19.8	41.3	28.2	0.0
Owner-Occupied Units by Geography	86,600	4.8	18.1	43.5	33.6	0.0
Occupied Rental Units by Geography	38,513	19.6	23.3	39.2	17.9	0.0
Vacant Units by Geography	10,791	25.2	21.7	30.9	22.2	0.0
Businesses by Geography	14,723	13.4	16.5	39.7	30.4	0.0
Farms by Geography	601	3.0	9.5	37.3	50.2	0.0
Family Distribution by Income Level	80,131	21.6	17.6	20.6	40.1	0.0
Household Distribution by Income Level	125,113	24.1	16.3	18.0	41.6	0.0
Median Family Income MSA - 37900 Peoria, IL MSA		\$69,329	Median Housing Value			\$136,421
			Median Gross Rent			\$714
			Families Below Poverty Level			9.9%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Illinois

The Springfield AA and Peoria AA received full-scope reviews while Bloomington AA, Champaign AA, Danville AA, and IL NonMSA AA received limited-scope reviews. The Springfield AA received a greater weighting as it accounts for a significant portion of INB's branch network, deposit sources, and lending activity.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full- and limited-scope reviews, the bank's lending performance in the state of Illinois is reasonable. The Springfield AA reflected reasonable geographic distribution performance and reasonable borrower distribution performance. The Peoria AA reflected reasonable geographic distribution performance and reasonable borrower distribution performance.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

The overall distribution of home mortgage loans by income level of the geography is excellent while the overall distribution of business loans by income level of the geography is reasonable.

Home Mortgage Loans

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

Springfield AA

The distribution of home mortgage loans reflects excellent distribution, given the performance context.

The proportion of lending in low-income geographies was near to the percentage of owner-occupied housing units and was stronger than the aggregate distribution. The proportion of lending in moderate-income geographies meets the percentage of owner-occupied housing units and was stronger than the aggregate distribution.

Peoria AA

The geographic distribution of home mortgage loans reflects reasonable distribution in the AA, given the performance context. We gave more weight to the performance in moderate-income geographies as they contain greater opportunities for owner-occupied lending versus the limited opportunities in low-income geographies.

For 2017-2018, the distribution of home mortgage loans reflects reasonable distribution. The proportion of lending to low-income geographies was less than the percentage of owner-occupied housing units and was weaker than the aggregate distribution. The proportion of lending in moderate-income geographies was near to the percentage of owner-occupied housing units and comparable to the aggregate distribution.

For 2019, the distribution of home mortgage loans reflects poor distribution. The proportion of lending to low-income geographies was less than the percentage of owner-occupied housing units and was weaker than the aggregate distribution. The proportion of lending in moderate-income geographies was less than the percentage of owner-occupied housing units and weaker than the aggregate distribution.

Small Loans to Businesses

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

Springfield AA

The distribution of small loans to businesses reflects reasonable distribution.

The proportion of small loans to businesses exceeded the percentage of businesses in low-income geographies and was stronger than the aggregate distribution. The proportion of small loans to businesses was near to the percentage of businesses in moderate-income geographies and was weaker than the aggregate distribution.

Peoria AA

The distribution of small loans to businesses reflects reasonable distribution.

For 2017-2018, the distribution of small loans to businesses reflects reasonable distribution. The proportion of small loans to businesses was less than the percentage of businesses in low-income geographies and was weaker than the aggregate distribution. The proportion of small loans to businesses exceeded the proportion of businesses in moderate-income geographies and was significantly stronger than the aggregate distribution.

For 2019, the distribution of small loans to businesses reflects reasonable distribution. The proportion of small loans to businesses was substantially less than the percentage of businesses in low-income geographies and was substantially weaker than the aggregate distribution. The proportion of small loans to businesses exceeded the proportion of businesses in moderate income geographies and was stronger than the aggregate distribution.

Lending Gap Analysis

We performed a lending gap analysis that included a review of density maps for HMDA loans and geocoded sampled business loans and compared the distributions to AA maps and location of branches. We did not identify any unexplained, conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. The overall distribution of home mortgage loans by income level of the borrower is reasonable while the overall distribution of small business loans is excellent.

Home Mortgage Loans

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

Springfield AA

The distribution of home mortgage loans reflects reasonable distribution in the AA.

The proportion of lending to low-income families was less than the percentage of low-income families in the AA but stronger than the aggregate distribution. The proportion of lending to moderate-income families exceeded the percentage of moderate-income families in the AA and was slightly weaker than the aggregate distribution.

Peoria AA

The distribution of home mortgage loans reflects reasonable distribution in the AA.

For 2017-2018, the distribution of home mortgage loans reflects reasonable distribution in the AA. The proportion of lending to low-income families was near to the percentage of low-income families in the AA and stronger than the aggregate distribution. The proportion of lending to moderate-income families exceeded the percentage of moderate-income families in the AA and was stronger than the aggregate distribution.

For 2019, the distribution of home mortgage loans reflects reasonable distribution in the AA. The proportion of lending to low-income families was less than the percentage of low-income families in the AA and weaker than the aggregate distribution. The proportion of lending to moderate-income families exceeded the percentage of moderate-income families in the AA and was stronger than the aggregate distribution.

Small Loans to Businesses

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

Springfield MSA

The distribution of small loans to small businesses reflects excellent distribution.

The proportion of lending small loans to small businesses meets the percentage of small businesses and is stronger than the aggregate distribution.

Peoria MSA

The distribution of small loans to small businesses reflects excellent distribution.

For 2017-2018, the distribution of small loans to small businesses reflects excellent distribution. The proportion of lending small loans to small businesses exceeds the percentage of small businesses in the AA and was significantly stronger than the aggregate distribution.

For 2019, the distribution of small loans to small businesses reflects excellent distribution. The proportion of lending small loans to small businesses exceeds the percentage of small businesses in the AA and was significantly stronger than the aggregate distribution.

Responses to Complaints

INB did not receive any complaints about its performance in helping to meet the credit needs of its AAs during the evaluation period.

Conclusions for Areas Receiving Limited Scope Reviews

The overall performance in limited-scope AAs is consistent with the overall performance under the Lending Test in the full-scope reviews.

Based on a limited-scope review, the bank's performance under the Lending Test in the Bloomington AA is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Based on limited-scope review, the bank's performance under the Lending Test in the Champaign AA is stronger than the bank's overall performance under the Lending Test in the full-scope areas. Performance in the Champaign AA exhibited excellent geographic distribution and excellent borrower distribution.

Based on limited-scope review, the bank's performance under the Lending Test in the Danville AA is weaker than the bank's overall performance under the Lending Test in the full-scope areas. Performance in the Danville AA exhibited poor geographic distribution and poor borrower distribution. Business lending is not a focus in the Danville AA. Less weight was given to the Small Loans to Businesses analysis as we were only able to geocode 12 small business loans within the AA.

Based on limited-scope review, the bank's performance under the Lending Test in the NonMSA AA is weaker than the bank's overall performance under the Lending Test in the full-scope areas. Performance in the NonMSA AA exhibited poor borrower distribution. Business lending is not a focus in the NonMSA AA. Less weight was given to the Small Loans to Businesses analysis as we were only able to

geocode 12 small business loans within the AA. There were no low- or moderate-income geographies in the AA.

The lending focus for the Danville and NonMSA AAs is agriculture lending, opposed to home mortgage and business lending in the other AAs.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Illinois is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope and limited-scope reviews, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

In making this determination, we gave more weight to the performance in the Springfield AA and considered the bank's level of expertise in CD activities, availability of opportunities as mentioned by community contacts, and the bank's limited presence outside of the Springfield AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Springfield	16	94.1	10,345	86.5
Peoria	0	0	0	0
Bloomington	0	0	0	0
Champaign-Urbana	1	5.9	1,608	13.5
Danville	0	0	0	0
IL Non-MSA	0	0	0	0
Total in AAs	17	100	11,953	100
Statewide with PMF*	1		488	
Statewide with No PMF	3		13,695	

Source: Bank submitted activity from June 13, 2016 to December 31, 2019. Due to rounding, totals may not equal 100.0% *Purpose Mandate or Function (PMF) in an AA.

INB's CD lending performance represents excellent responsiveness in the full-scope areas, given the opportunities and needs. The performance is excellent in the Springfield AA but very poor in the Peoria AA.

INB's CD lending activity in the Springfield AA include 16 loans and lines of credit totaling \$10.3 million and representing 11.1 percent of allocated tier 1 capital. The CD lending activity in the Springfield AA represents 86.5 percent of all CD lending activity and is comparable to the portion of

deposits sourced from the AA at 88.6 percent. The loans benefited organizations that provide low-income housing and helped to revitalize a blighted area targeted for redevelopment. The Peoria AA had no qualifying CD lending activity.

Notable CD loan activity in the full-scope AAs include:

- A \$1.6 million loan for a New Markets Tax Credit project for the rehabilitation of a vacant building in downtown Springfield, Illinois. The rehabilitation created commercial space and 25 residential units.
- A \$2.8 million loan for a Low-Income Housing Tax Credit project for the rehabilitation of 28 single-family homes in Springfield, Illinois.

INB originated one loan totaling \$488 thousand in the statewide area to an entity that provides medical and dental services to LMI persons. This entity has a purpose, mandate, or function in the Springfield AA.

INB originated three loans totaling \$13.7 million in the statewide area to entities that provide low-income housing to seniors, persons with disabilities, and veterans in the central Illinois area.

Notable CD loan activity in the statewide area include a \$4.1 million loan for a Low-Income Housing Tax Credit project to construct duplexes and triplexes totaling 23 units for low-income persons who are seniors, individuals with disabilities, or veterans. The project is in Morgan County, which is adjacent to the Springfield AA county of Sangamon.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Springfield	0	0	27	26	27	81.8	26	86.7	0	0
Peoria	0	0	3	2	3	9.1	2	6.7	0	0
Bloomington	0	0	0	0	0	0	0	0	0	0
Champaign-Urbana	0	0	3	2	3	9.1	2	6.7	0	0
Danville	0	0	0	0	0	0	0	0	0	0
IL Non-MSA	0	0	0	0	0	0	0	0	0	0
Total in AAs	0	0	33	30	33	100	30	100	0	0

Source: Bank submitted activity from June 13, 2016 to December 31, 2019. Due to rounding, totals may not equal 100.0 percent.

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

INB's CD investment performance represents poor responsiveness in the full-scope AAs for both the Springfield and Peoria AAs. In the full-scope AAs, INB had 30 qualifying donations totaling \$28 thousand, or less than one percent of allocated tier 1 capital. The Springfield AA represented a majority of the activity with \$26 thousand in donations. Entities that benefited from INB's donations included

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

those that provide health and human services, such as medical services and foodbank services to LMI persons.

Extent to Which the Bank Provides Community Development Services

INB's CD services performance represents adequate responsiveness in the full-scope AAs. INB's delivery systems are reasonably accessible to individuals of different incomes and business of different sizes via branches, ATMs, and through telephone, internet, and mobile banking platforms. Additionally, one branch and four publicly available ATMs are located in moderate-income CTs in the Springfield AA.

INB had 10 qualifying activities in the Springfield AA. Notable examples include:

- Eight bank officers provided 30 hours of financial literacy training at multiple events.
- Four bank officers served in leadership capacities on boards of six entities that provide health and human services to LMI persons and provide services to small businesses and promote economic development. Hours were not provided for consideration.
 - One bank officer served as a loan committee chairman for a not-for-profit community development corporation that provides SBA 504 loans to small businesses in Illinois.

INB had two qualifying activities in the Peoria AA. Activities included a bank officer serving as a board member of two entities that provide health and human services and employment services to people in need. Hours were not provided for consideration.

INB participates in lending programs to help meet the credit needs of LMI homebuyers and small businesses.

- INB participates in a downpayment assistance program with the FHLB Chicago where LMI borrowers can receive up to \$6,000 in grants forgiven within five years of home ownership. Under the program, 176 loans totaling \$14.0 million were originated where borrowers benefited from \$1.0 million in downpayment assistance grants during the CD evaluation period. This service is available in all AAs.
- INB participates in lending programs with the SBA. Under the program, INB originated 39 loans totaling \$8.1 million to small businesses during the CD evaluation period. This service is available in all AAs.

Conclusions for Areas Receiving Limited Scope Reviews

Based on a limited-scope review, the bank's performance under the CD Test in the Bloomington AA is weaker than the bank's overall performance under the CD Test in the full scope areas. INB had one qualifying CD services where two bank officers provided 30 hours of career mentoring and financial literacy training.

Based on a limited-scope review, the bank's performance under the CD Test in the Champaign AA is stronger than the bank's overall performance under the CD Test in the full scope areas. One loan totaling \$1.6 million benefited an entity that provides early childhood development services to children of LMI families. This loan represented 13.5 percent of all CD lending activity, exceeding the portion of deposits sourced from the AA, which was 7.8 percent. The loan represents 431.2 percent of allocated tier 1 capital for the AA.

Based on a limited-scope review, the bank's performance under the CD Test in the Danville AA is weaker than the bank's overall performance under the CD Test in the full scope areas. INB had one qualifying CD services where one bank officer provided three hours of financial literacy training.

Based on a limited-scope review, the bank's performance under the CD Test in the NonMSA AA is weaker than the bank's overall performance under the CD Test in the full scope areas. There were no qualifying CD activities.

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 MSA(s) and non-MSA(s) 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:	June 13, 2016 to December 31, 2019	
Bank Products Reviewed:	Home mortgage and small business loans. Community development loans, qualified investments, and community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Illinois		
Springfield MSA	Full-Scope	Sangamon County
Peoria MSA	Full-Scope	Portions of Peoria, Tazewell, and Woodford Counties
Bloomington MSA	Limited-Scope	McLean County
Champaign-Urbana MSA	Limited-Scope	Champaign and Piatt Counties
Danville MSA	Limited-Scope	Vermillion County
Illinois NonMSA	Limited-Scope	Logan County

Appendix B: Summary of MMSA and State Ratings

RATINGS INB, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Overall	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Illinois	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight 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, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	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		
Springfield	1,153	179,475	67.8	6,487	9.9	6.2	5.7	13.3	13.1	11.3	42.2	41.5	43.7	34.6	39.2	39.2	0.0	0.0	0.0		
Champaign*	488	77,081	28.7	5,479	4.9	7.2	5.0	10.8	11.1	9.2	58.1	61.5	57.3	26.1	19.9	28.4	0.1	0.4	0.1		
Danville	34	3,111	2.0	1,182	2.8	0.0	1.1	11.4	2.9	3.8	49.6	35.3	49.3	36.2	61.8	45.8	0.0	0.0	0.0		
IL NonMSA	26	3,665	1.5	552	0.0	0.0	0.0	0.0	0.0	0.0	90.6	92.3	90.6	9.4	7.7	9.4	0.0	0.0	0.0		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. *Data from 4/9/2018 – 12/31/2019
 Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2018		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	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		
Peoria	706	97,251	76.7	7,957	4.8	1.6	2.2	18.1	16.7	17.8	43.5	42.5	44.3	33.6	39.2	35.7	0.0	0.0	0.0		
Bloomington	215	32,954	23.3	4,770	2.3	4.2	3.1	13.0	10.7	11.3	55.2	42.8	52.8	29.5	42.3	32.7	0.0	0.0	0.0		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Peoria	326	46,472	76.7	7,957	4.5	1.5	2.2	15.8	8.0	17.8	44.4	51.5	44.3	35.3	39.0	35.7	0.0	0.0	0.0
Bloomington	99	21,094	23.3	4,770	2.3	10.1	3.1	14.3	9.1	11.3	53.9	38.4	52.8	29.5	42.4	32.7	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Springfield	1,153	179,475	67.8	6,487	22.8	10.1	8.9	16.2	16.8	18.3	20.4	19.9	20.3	40.5	37.3	35.9	0.0	15.8	16.6
Champaign*	488	77,081	28.7	5,479	21.8	11.7	9.7	16.5	23.0	18.6	20.7	27.0	20.4	41.0	30.3	35.9	0.0	8.0	15.4
Danville	34	3,111	2.0	1,182	21.7	2.9	5.9	16.8	17.6	18.2	20.7	29.4	23.9	40.8	44.1	33.7	0.0	5.9	18.3
IL NonMSA	26	3,665	1.5	552	19.4	3.8	7.6	15.0	7.7	17.6	20.8	23.1	18.8	44.7	61.5	23.9	0.0	3.8	32.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. *Data from 4/9/2018 – 12/31/2019
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-2018		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Peoria	706	97,251	76.7	7,957	21.6	16.0	13.8	17.6	21.2	19.6	20.6	20.8	19.4	40.1	38.4	28.8	0.0	3.5	18.4		
Bloomington	215	32,954	23.3	4,770	19.4	14.9	13.9	17.3	20.0	21.1	22.2	21.4	20.1	41.1	34.0	26.0	0.0	9.8	18.9		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Peoria	326	46,472	76.7	7,957	21.6	8.6	13.8	17.6	20.2	19.6	20.6	21.8	19.4	40.1	42.6	28.8	0.0	6.7	18.4		
Bloomington	99	21,094	23.3	4,770	19.4	10.1	13.9	17.3	19.2	21.1	22.2	26.3	20.1	41.1	32.3	26.0	0.0	12.1	18.9		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2019		
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Springfield	37	3,557	42.5	2,449	15.8	24.3	14.5	18.0	10.8	16.7	37.4	37.8	35.0	28.8	27.0	33.8	0.0	0.0	0.0		
Champaign*	26	3,688	29.9	2,680	10.3	15.4	9.7	18.3	30.8	14.6	41.6	50.0	44.7	27.1	3.8	29.7	2.7	0.0	1.3		
Danville	12	578	13.8	601	3.9	0.0	4.0	22.2	0.0	18.5	42.8	41.7	41.3	31.1	58.3	36.3	0.0	0.0	0.0		
IL NonMSA	12	1,974	13.8	183	0.0	0.0	0.0	0.0	0.0	0.0	91.4	91.7	90.2	8.6	8.3	9.8	0.0	0.0	0.0		

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. *Data from 4/9/2018 - 12/31/2019
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2018		
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Peoria	25	3,1667	50.0	4,211	13.4	4.0	11.9	16.5	28.0	15.0	39.7	36.0	38.6	30.4	32.0	34.5	0.0	0.0	0.0		
Bloomington	25	2,821	50.0	2,443	8.9	12.0	6.5	10.1	16.0	10.6	59.7	60.0	50.8	21.3	12.0	32.1	0.0	0.0	0.0		

Source: 2019 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019	
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Peoria	25	2,398	49.0	4,211	12.8	0.0	11.9	14.1	20.0	15.0	39.2	52.0	38.6	33.9	28.0	34.5	0.0	0.0	0.0	
Bloomington	26	4,150	51.0	2,443	8.5	15.4	6.5	13.0	0.0	10.6	55.6	57.7	50.8	22.9	26.9	32.1	0.0	0.0	0.0	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Springfield	37	3,557	42.5	2,449	74.4	73.0	44.5	7.3	27.0	18.3	0.0		
Champaign*	26	3,688	29.9	2,680	76.0	88.5	44.3	5.9	11.5	18.1	0.0		
Danville	12	578	13.8	601	73.3	91.7	48.8	6.5	8.3	20.3	0.0		
IL NonMSA	12	1,974	13.8	183	71.5	75.0	42.6	6.4	25.0	22.0	0.0		

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. *Data from 4/9/2018 – 12/31/2019
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2018	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Peoria	25	3,1667	50.0	4,211	75.1	84.0	43.2	8.0	16.0	16.9	0.0	
Bloomington	25	2,821	50.0	2,443	76.6	80.0	42.2	6.6	20.0	16.8	0.0	
<i>Source: 2019 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Peoria	25	2,398	49.0	4,211	77.7	84.0	43.2	7.0	16	15.3	0.0	
Bloomington	26	4,150	51.0	2,443	79.4	53.8	42.2	5.7	46.2	14.8	0.0	
<i>Source: 2019 D&B Data; 01/01/2018 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												