Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

December 4, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank of Hillsboro, National Association
Charter Number 14510

230 South Main St
Hillsboro, IL 62049

Office of the Comptroller of the Currency
500 N. Broadway St. Suite 1700
St. Louis, MO 63102

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 **1**

SCOPE OF THE EVALUATION **4**

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW **6**

STATE RATING **7**

STATE OF ILLINOIS 7

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 Lending Test and Community Development (CD) Test ratings are based on Bank of Hillsboro's (bank) performance in the state of Illinois. The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of the bank's loans are inside its assessment areas (AAs).
- The bank's distribution of loans across geographies of different income levels is reasonable throughout its AAs.
- The bank's distribution of loans to individuals of different income levels and businesses of different sizes is excellent throughout its AAs.
- The bank demonstrates adequate responsiveness to the CD needs of its AAs.

Loan-to-Deposit Ratio

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

As of December 31, 2018, the bank's LTD ratio was 79.8 percent. The bank's average LTD ratio over the evaluation period of 10 quarters was 80.3 percent. Over the same evaluation period, the bank's LTD ratio ranged from a low of 77.9 percent to a high of 83.9 percent.

When evaluating the reasonableness of the bank's LTD ratio, we considered the impact of home mortgage loan originations sold by the bank to the secondary loan market. Additionally, we analyzed the LTD ratio of eight similarly situated institutions based on a combination of their size, location, and lending opportunities. These institutions ranged in size from $252 million to $540 million, with a combined average LTD ratio of 77.9 percent over the same evaluation period. The lowest individual average was 58.5 percent, while the highest individual average was 90.6 percent. The bank ranked sixth out of nine when comparing the average LTD ratios. The table below lists the similarly situated institutions (including the bank) with the corresponding average LTD ratios.

Institution	Total Assets ($000s) as of 12/31/2018	Average Quarterly LTD Ratio
Shelby County State Bank	$251,542	90.6%
Washington Savings Bank	$365,470	90.4%
Peoples Bank & Trust	$423,488	86.6%
Bank & Trust Company	$320,783	81.3%
The First National Bank in Staunton	$540,270	80.6%
Bank of Hillsboro	**$339,141**	**80.3%**
Germantown Trust & Savings Bank	$376,370	68.7%
The FNB Community Bank	$337,348	66.7%
The Bradford National Bank of Greenville	$295,821	58.5%

Source: Quarterly Call Reports from September 30, 2016 to December 31, 2018.
Note: The LTD ratio was calculated and evaluated 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 82.3 percent of its total loans by number and 71.7 percent by dollar inside the bank's AAs during the evaluation period. This ratio is a bank-wide calculation and not calculated by individual rating area or AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans $(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	$	%	$	%	$(000s)
Home Mortgage										
2016	200	84.7	36	15.3	236	24,990	64.0	14,084	36.0	39,074
2017	126	78.8	34	21.3	160	17,534	80.9	4,138	19.1	21,672
2018	107	83.6	21	16.4	128	9,961	76.5	3,068	23.5	13,029
Subtotal	**433**	**82.6**	**91**	**17.4**	**524**	**52,485**	**71.1**	**21,290**	**28.9**	**73,775**
Business Loans										
2016	5	71.4	2	28.6	7	1,517	81.5	345	18.5	1,862
2017	7	70.0	3	30.0	10	1,696	85.0	299	15.0	1,995
2018	2	66.7	1	33.3	3	414	64.8	225	35.2	639
Subtotal	**14**	**70.0**	**6**	**30.0**	**20**	**3,627**	**80.7**	**869**	**19.3**	**4,496**
Consumer Loans										
2016	5	71.4	2	28.6	7	27	23.5	88	76.5	115
2017	3	100.0	0	0.0	3	34	100.0	0	0.0	34
2018	9	90.0	1	10.0	10	97	93.3	7	6.7	104
Subtotal	**17**	**85.0**	**3**	**15.0**	**20**	**158**	**62.5**	**95**	**37.5**	**253**
Total	**464**	**82.3**	**100**	**17.7**	**564**	**56,270**	**71.7**	**22,254**	**28.3**	**78,524**
Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data *Due to rounding, totals may not equal 100.0*										

Description of Institution

Bank of Hillsboro[1] is an intrastate bank headquartered in Hillsboro, Illinois, and wholly owned by Country Bancorp, Inc. (CBI), a one-bank holding company headquartered in Hillsboro, Illinois. As of December 31, 2018, CBI had total assets of approximately $42 million. There were no affiliate or subsidiary activities considered in this evaluation.

The bank currently operates one main office and a separate limited-service drive-up facility located in Hillsboro, Illinois and 10 branches located in the following cities in Illinois: Alhambra, Altamont, Carlyle, Edwardsville, Effingham, Greenville, Highland, Keyesport, Pana, and Vandalia. The main office and each of the branch locations, have a cash-dispensing automated teller machine (ATM) onsite. The bank did not open or close any new branches or engage in any acquisition or merger activities during the evaluation period.

[1] On September 19, 2018, the bank received approval from the OCC to change its name from National Bank to Bank of Hillsboro, National Association.

As of December 31, 2018, the bank had total assets of $339.1 million, total deposits of $300.6 million, and Tier 1 Capital of $38.2 million, or 14.2 percent of total risk weighted assets. The bank's net loans and leases totaled $240 million, representing 70.7 percent of total assets. Loan portfolio composition as of December 31, 2018, includes the following:

Loan Type	Dollars (000)	Percentage of Loan Portfolio
Commercial Loans	$134,922	55.3%
Agriculture Loans	$65,351	26.8%
Residential Loans	$40,415	16.6%
Consumer Loans	$2,138	1.0%
Other Loans	$1,359	<1.0%
Total Loans	**$244,185**	**100%**
Source: 12/31/2018 FFIEC Call Report		

Bank of Hillsboro competes with many national banks, state banks, and credit unions for deposit market share. The bank offers a variety of deposit products to businesses and consumers. Deposit products consist of checking (including a Fresh Start[2] account), savings, and money market deposit accounts, certificates of deposit, individual retirement accounts, and health savings accounts. The bank offers additional retail services including check cashing, direct deposit, online banking with bill payment and funds transfer, mobile banking, remote deposit capture, safe deposit box rentals and telephone banking.

Consumer loan products include conventional mortgages, home equity loans, lines of credit, personal loans, automobile loans, and credit cards. Business loan products include term loans, lines of credit, machinery/equipment loans, government guaranteed loans, and credit cards.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The bank's last CRA performance evaluation was on September 6, 2016. Utilizing Intermediate Small Bank CRA examination procedures, the OCC concluded that the bank's performance was "Satisfactory."

For CRA purposes, the bank has identified two AAs. The first AA includes a portion of the St. Louis Metropolitan Statistical Area (MSA) # 41180, which the bank refers to as the St. Louis MSA. The St. Louis MSA includes all of Bond County and portions of Clinton, Macoupin, and Madison Counties, all in Illinois. The second AA is located in central Illinois in a Non-MSA area, which the bank refers to as the Illinois Non-MSA. The Illinois Non-MSA includes all of Effingham, Fayette and Montgomery Counties, and portions of Christian and Shelby Counties. Both AAs conform to regulatory requirements and do not arbitrarily exclude any low- and moderate-income geographies.

[2] Fresh Start Checking provides consumers with an opportunity to qualify for and open a traditional checking account, even if the consumer has negative banking history with the bank or another financial institution.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of the bank under the Intermediate Small Bank (ISB) performance criteria, which consists of a Lending Test and CD Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities and the CD Test evaluates the bank's record of meeting the CD needs of its AAs through its CD lending, investment, and service activities.

The evaluation period for this examination is from September 7, 2016 through December 31, 2018. For the Lending Test, we determined that the bank's loan data from January 1, 2016 through December 31, 2018 was representative of the evaluation period. For the CD Test, we determined that the bank's CD lending, investment, and service activities from September 7, 2016 through December 31, 2018 were representative of the evaluation period.

Based on discussions with bank management and our review of all loan originations and purchases from January 1, 2016 to December 31, 2018, we determined the bank's primary lending products are home mortgage loans and business loans for the St. Louis MSA, and home mortgage loans and consumer loans for the Illinois Non-MSA. Please refer to the following tables for a summary of loan originations by loan type, for each of the AAs during the evaluation period:

St. Louis MSA Loan Originations by Loan Type from January 1, 2016 through December 31, 2018				
Loan Category	**Number of Loans**	**% of Number of Loans**	**Dollars (000s)**	**% of Dollars**
Home Mortgage Loans	290	46.6%	$34,934	31.4%
Business Loans	137	22.0%	$53,255	47.9%
Consumer Loans	102	16.4%	$1,000	1.0%
Farm Loans	93	15.0%	$21,921	19.7%
Total Originations	**622**	**100%**	**$111,110**	**100%**
Source: Bank Records January 1, 2016 – December 31, 2018				

Illinois Non-MSA Loan Originations by Loan Type from January 1, 2016 through December 31, 2018				
Loan Category	**Number of Loans**	**% of Number of Loans**	**Dollars (000s)**	**% of Dollars**
Home Mortgage Loans	383	43.3%	$39,914	27.3%
Consumer Loans	255	28.9%	$2,456	1.7%
Farm Loans	124	14.0%	$18,358	12.6%
Business Loans	122	13.8%	$85,402	58.4%
Total Originations	**884**	**100%**	**$146,130**	**100%**
Source: Bank Records January 1, 2016 – December 31, 2018				

To evaluate lending performance, we reviewed the bank submitted Home Mortgage Disclosure Act (HMDA) data for each of the bank's AAs from 2016, 2017, and 2018 for home mortgage loans. Additionally, we selected a random sample of business loans from the St. Louis MSA, and a random sample of consumer loans from the Illinois Non-MSA. Sample sizes for both the business and consumer loans were identical (20 loans originated in 2016 and 20 loans originated during the period of 2017-2018). Refer to the “Scope” section under State Rating for further detail.

We completed two separate analyses of the bank’s lending performance. For performance in 2016, we used the comparators of demographic data from the 2010 United States (U.S.) Census and 2016 HMDA and CRA peer aggregate data. For the lending performance in 2017-2018, we used the comparators of demographic data from the 2015 American Community Survey (ACS) U.S. Census and 2018 HMDA and CRA peer aggregate data. The 2015 ACS provided an update to median family income (MFI), changing the income designation of some census tracts (CTs) in the AAs in 2017.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas 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. Full-scope reviews consider quantitative and qualitative factors, as well as performance context factors. Limited-scope reviews consider quantitative factors only. Refer to the “Scope” section under State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from a blend of the bank’s performance under the CRA ISB Lending Test and CD Test, as well as related performance context information from the bank’s St. Louis MSA and Illinois Non-MSA. With the exception of the bank’s LTD ratio (based on the bank’s entire lending portfolio), performance under the CRA Intermediate Small Bank Lending Test was based on the bank’s lending performance in relation to its primary products of home mortgage loans and business loans in the St. Louis MSA, and home mortgage loans and consumer loans in the Illinois Non-MSA. Performance under the CRA ISB CD Test was based on the level of the bank’s CD activities in each of its AAs.

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 Illinois: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's LTD ratio is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of the bank's loans are inside its AAs.
- The bank's distribution of loans across geographies of different income levels is reasonable throughout its AAs.
- The bank's distribution of loans to individuals of different income levels and businesses of different sizes is excellent throughout its AAs.
- The bank demonstrates adequate responsiveness to the CD needs of its AAs.

Description of Institution's Operations in Illinois

The bank operates a main office, a separate limited-service drive-up facility, and 10 branches across two AAs in the state of Illinois. Due to differences in the primary products in each AA, we chose different products for analysis in each AA. In the St. Louis MSA, we reviewed home mortgage and business loans, and in the Illinois Non-MSA, we reviewed home mortgage and consumer loans.

<u>St. Louis MSA</u>

The St. Louis MSA consists of 36 contiguous CTs, including all of Bond County and portions of Clinton, Macoupin, and Madison Counties. The AA consists of seven moderate-income CTs, 17 middle-income CTs, and 12 upper-income CTs. Six of the branches are located in the St. Louis MSA. The Greenville branch is located in a moderate-income CT, the Alhambra, Carlyle, Highland and Keyesport branches are located in middle-income CTs, and the Edwardsville branch is located in an upper-income CT.

The bank faced heavy competition for deposits and lending during the evaluation period. As of June 30, 2018, the bank reported $127 million in deposits in the St. Louis MSA, representing 43.3 percent of the bank's total deposits. According to FDIC market share information as of June 30, 2018, the bank ranked 12th in deposit market share in the AA with a market share of 1.8 percent. The AA is extremely competitive with 42 other deposit-taking institutions operating 139 branches. The top five institutions in deposit market share account for 52 percent of deposits in the AA, consisting of the Bank of Edwardsville (17 percent), FCB Banks (12.4 percent), U.S. Bank (8.4 percent), First Mid Bank & Trust (8 percent), and Regions Bank (6.3 percent).

An analysis of HMDA peer mortgage data in the AA over the evaluation period further demonstrates the extreme level of competition faced by the bank. The bank originated 177 home mortgage loans in the St. Louis MSA over the evaluation period for a market share of 0.94 percent. During the same period, an average of 255 other lending institutions originated or purchased a total of 18,618 home mortgage loans within the same AA.

Demographic Information of the St. Louis MSA AA for 2016						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	36	0.0	13.9	61.1	25.0	0.0
Population by Geography	178,762	0.0	10.1	58.7	31.2	0.0
Housing Units by Geography	73,460	0.0	11.8	60.4	27.8	0.0
Owner-Occupied Units by Geography	52,206	0.0	9.9	59.4	30.7	0.0
Occupied Rental Units by Geography	15,596	0.0	15.8	62.3	21.9	0.0
Vacant Units by Geography	5,658	0.0	18.2	64.6	17.2	0.0
Businesses by Geography	9,109	0.0	8.9	56.6	34.5	0.0
Farms by Geography	773	0.0	7.0	65.5	27.6	0.0
Family Distribution by Income Level	46,550	16.8	16.0	23.6	43.7	0.0
Household Distribution by Income Level	67,802	21.2	15.4	17.9	45.4	0.0
Median Family Income - St. Louis, MO-IL MSA (41180)	$66,798		Median Housing Value			$147,557
Percentage of Families Below the Poverty Level	6.1%		Median Gross Rent			$713
Percentage of Households Below the Poverty Level	9.3%		Median Age of Housing Stock			43 years

Source: 2010 U.S. Census and 2016 Dun & Bradstreet Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Demographic Information of the St. Louis MSA AA for 2017-2018						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	36	0.0	19.4	47.2	33.3	0.0
Population by Geography	178,192	0.0	16.5	43.4	40.2	0.0
Housing Units by Geography	75,227	0.0	18.1	45.3	36.6	0.0
Owner-Occupied Units by Geography	51,272	0.0	14.5	46.0	39.5	0.0
Occupied Rental Units by Geography	17,256	0.0	25.4	43.2	31.4	0.0
Vacant Units by Geography	6,699	0.0	26.7	45.8	27.6	0.0
Businesses by Geography	9,240	0.0	15.6	45.1	39.3	0.0
Farms by Geography	728	0.0	7.6	54.3	38.2	0.0
Family Distribution by Income Level	46,803	16.2	17.4	21.2	45.2	0.0
Household Distribution by Income Level	68,528	21.1	15.1	17.0	46.8	0.0
Median Family Income - St. Louis, MO-IL MSA (41180)	$70,718		Median Housing Value			$153,063
Percentage of Families Below the Poverty Level	6.6%		Median Gross Rent			$798
Percentage of Households Below the Poverty Level	10.7%		Median Age of Housing Stock			43 years

Source: 2015 ACS Census and 2018 Dun & Bradstreet Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Geographic Distribution of the Population

According to the 2010 U.S. Census data, the area population was 178,762 with 18,055 (10.1 percent) residing in moderate-income CTs, 104,933 (58.7 percent) residing in middle-income CTs, and 55,774 (31.2 percent) residing in upper-income CTs.

According to the 2015 ACS Census data, the area population was 178,192 with 29,402 (16.5 percent) residing in moderate-income CTs, 77,335 (43.4 percent) residing in middle-income CTs, and 71,633 (40.2 percent) residing in upper-income CTs.

Family Distribution by Income Level

Based on the data found in the table below, the annual FFIEC adjusted MFI increased by approximately 9.4 percent ($6,600) between 2016 and 2018.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
St. Louis MSA FFIEC Adjusted Median Family Income				
2016 ($70,000)	<$35,000	$35,000 to <$56,000	$56,000 to <$84,000	≥$84,000
2017 ($74,300)	<$37,150	$37,150 to <$59,440	$59,440 to <$89,160	≥$89,160
2018 ($76,600)	<$38,300	$38,300 to <$61,280	$61,280 to <$91,920	≥$91,920
Source: The Federal Financial Institutions Examination Council				

According to the 2010 U.S. Census data, there were 46,550 families in the AA. The distribution of families by income level was 7,820 (16.8 percent) low-income, 7,448 (16 percent) moderate-income, 10,986 (23.6 percent) middle-income, and 20,296 (43.6 percent) upper-income.

According to the 2015 ACS Census data, there were 46,803 families in the AA. The distribution of families by income level was 7,582 (16.2 percent) low-income, 8,144 (17.4 percent) moderate-income, 9,922 (21.2 percent) middle-income, and 21,155 (45.2 percent) upper-income. Between 2016 and 2018, there was a slight increase in the percentage of families in the AA living below the poverty level.

Housing Characteristics and Home Affordability

The 2010 U.S. Census reported total housing units of 73,460 in the AA. Of the total number of housing units, 52,206 or 71.1 percent were owner-occupied, 15,596 or 21.2 percent were renter-occupied, and 5,658 or 7.7 percent were vacant. There were no housing units located in low-income CTs; 9.9 percent (5,168) of owner-occupied units, 15.8 percent (2,464) of occupied rental units, and 18.2 percent (1,030) of vacant units, were located in moderate-income CTs, respectively. Additionally, 7,399 or 11.5 percent of all single family (1-4 units) homes and 865 or 17.6 percent of all multifamily housing units were located in moderate-income CTs. The weighted average median housing value for the AA was approximately 4.2 times the income of low-income borrowers and 2.6 times the income of moderate-income borrowers. The median age of housing stock in the moderate-income CTs of the AA was 58 years compared to the overall median age of 43 years. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. All of these factors add to the overall cost of homeownership and in turn, can have a negative impact on home affordability for LMI individuals.

The 2015 ACS Census reported total housing units of 75,227 in the AA. Of the total number of housing units, 51,272 or 68.2 percent were owner-occupied, 17,256 or 22.9 percent were renter-occupied, and 6,699 or 8.9 percent were vacant. There were no housing units located in low-income CTs; 14.5 percent (7,434) of owner-occupied units, 25.4 percent (4,383) of occupied rental units, and 26.7 percent (1,789) of vacant units, were located in moderate-income CTs, respectively. Additionally, 11,586 or 17.7 percent of all single family (1-4 units) homes and 1,651 or 28.9 percent of all multifamily housing units were located in moderate-income CTs. The weighted average median housing value was approximately four times the income of low-income borrowers and 2.5 times the income of moderate-income borrowers. The median age of housing stock in the moderate-income CTs of the AA increased to 61 years, while the overall median age remained at 43 years.

One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making $38,300 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI in the AA) could afford a $178,365 mortgage with a payment of $958 per month. A moderate-income borrower making $61,280 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI in the AA) could afford a $285,382 mortgage with a payment of $1,532 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan based on the median housing value in the AA with an estimated payment of $1,073. According to Realtor.com data, the median housing value in the AA ranged from $155,100 in 2016 to $199,950 in 2018, an increase of 28.9 percent.

Employment Factors

According to the U.S. Bureau of Labor Statistics (BLS) data, the annual unemployment rate across the AA ranged from a high of 6 percent in 2016 to a low of 3.6 percent in 2018. The annual unemployment rate for the state of Illinois ranged from a high of 5.8 percent in 2016 to a low of 4.3 percent in 2018, lagging behind the national unemployment rate over the same period.

Annual Unemployment Rates 2016-2018

Area	2016	2017	2018
Bond County	5.1%	4.5%	4.4%
Clinton County	4.5%	3.6%	3.6%
Macoupin County	6.0%	4.9%	4.9%
Madison County	5.9%	4.8%	4.5%
State of Illinois	5.8%	4.9%	4.3%
National	4.9%	4.4%	3.9%

Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted.

Economic Conditions

According to Moody's Analytics, *St. Louis will experience more modest job growth in 2020. The metro area is in a late-cycle expansion and the tight labor market combined with only moderate gains in goods-producing industries will prevent the economy from besting the nation. An uninspiring demographic profile will keep STL from expanding at the national average in the long run.* The top five employment sectors in the AA are Education and Health Services, Professional and Business Services, Leisure and Hospitality Services, Government, and Retail Trade. The top employers in the AA include BJC Healthcare, Wal-Mart Stores, Inc., SSM Health Care System, Washington University, Boeing Defense, Space & Security, and Mercy Health Care.

Community Contacts

We reviewed a recent OCC contact (July 2019) with a community-based development organization that serves multiple counties on the Illinois side of the St. Louis MO-IL MMSA. The contact identified affordable housing and financial literacy training as the primary needs in the local communities.

Illinois Non-MSA

The Illinois Non-MSA consists of 29 contiguous CTs, including all of Fayette, Effingham, and Montgomery Counties, and portions of Christian and Shelby Counties. The AA consists of five moderate-income CTs, 20 middle-income CTs, and four upper-income CTs. The bank's main office, separate drive-up facility, and four branches are located in the Illinois Non-MSA. The Pana branch is located in a moderate-income CT, while the main office and separate drive-up facility are in Hillsboro and the Altamont, Effingham, and Vandalia branches are located in middle-income CTs.

The bank faced strong competition for deposits and lending during the evaluation period. As of June 30, 2018, the bank reported $166.4 million in deposits in the Illinois Non-MSA, representing 56.7 percent of the bank's total deposits. According to FDIC market share information as of June 30, 2018, the bank ranked 8th in deposit market share in the AA with a market share of 4.1 percent. The AA is extremely competitive with 38 other deposit-taking institutions operating 87 branches. The top five institutions in deposit market share account for 38.7 percent of deposits in the AA, consisting of Midland States Bank (15 percent), Dietrich Bank (8.4 percent), Washington Savings Bank (5.5 percent), The First National Bank (5 percent), and Peoples Bank & Trust (4.9 percent).

An analysis of HMDA peer mortgage data in the AA over the evaluation period further demonstrates the strong level of competition faced by the bank. The bank originated 256 home mortgage loans in the Illinois Non-MSA over the evaluation period for a market share of 4.9 percent. During the same period, an average of 161 other lending institutions originated or purchased a total of 4,962 home mortgage loans within the same AA.

Demographic Information of the Illinois Non-MSA AA for 2016						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	29	0.0	10.3	75.9	13.8	0.0
Population by Geography	107,974	0.0	7.3	76.0	16.7	0.0
Housing Units by Geography	45,788	0.0	7.7	75.5	16.8	0.0
Owner-Occupied Units by Geography	32,625	0.0	7.3	74.0	18.7	0.0
Occupied Rental Units by Geography	8,620	0.0	8.9	80.4	10.7	0.0
Vacant Units by Geography	4,543	0.0	8.7	76.8	14.5	0.0
Businesses by Geography	5,691	0.0	5.0	75.9	19.1	0.0
Farms by Geography	842	0.0	4.9	73.8	21.4	0.0
Family Distribution by Income Level	28,073	19.8	16.2	23.4	40.7	0.0
Household Distribution by Income Level	41,245	23.6	16.1	17.7	42.7	0.0
Median Family Income – Illinois Non-MSA (99999)	$54,499		Median Housing Value			$88,820
Percentage of Families Below the Poverty Level	10.1%		Median Gross Rent			$553
Percentage of Households Below the Poverty Level	13.2%		Median Age of Housing Stock			52 years

Source: 2010 U.S. Census and 2016 Dun & Bradstreet Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Demographic Information of the Illinois Non-MSA AA for 2017-2018						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	29	0.0	17.2	69.0	13.8	0.0
Population by Geography	106,463	0.0	10.8	71.8	17.4	0.0
Housing Units by Geography	46,161	0.0	12.1	71.1	16.8	0.0
Owner-Occupied Units by Geography	31,936	0.0	11.4	69.3	19.3	0.0
Occupied Rental Units by Geography	8,308	0.0	12.3	77.2	10.5	0.0
Vacant Units by Geography	5,917	0.0	15.4	72.0	12.6	0.0
Businesses by Geography	5,611	0.0	8.9	72.4	18.7	0.0
Farms by Geography	744	0.0	12.1	68.4	19.5	0.0
Family Distribution by Income Level	27,621	20.5	17.9	22.2	39.4	0.0
Household Distribution by Income Level	40,244	22.5	16.4	18.3	42.8	0.0
Median Family Income – Illinois Non-MSA (99999)	$59,121		Median Housing Value			$98,727
Percentage of Families Below the Poverty Level	10.1%		Median Gross Rent			$581
Percentage of Households Below the Poverty Level	12.9%		Median Age of Housing Stock			50 years

Source: 2015 ACS Census and 2018 Dun & Bradstreet Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Geographic Distribution of the Population

According to the 2010 U.S. Census data, the area population was 107,974 with 7,882 (7.3 percent) residing in moderate-income CTs, 82,060 (76 percent) residing in middle-income CTs, and 18,032 (16.7 percent) residing in upper-income CTs.

According to the 2015 ACS Census data, the area population was 106,463 with 11,498 (10.8 percent) residing in moderate-income CTs, 76,440 (71.8 percent) residing in middle-income CTs, and 18,525 (17.4 percent) residing in upper-income CTs.

Family Distribution by Income Level

The 2018 FFIEC adjusted MFI for the AA was $63,900, up from $58,000 in 2016. Low-income families earned annual income of $31,950 or less, and moderate-income families earned annual income of $31,950 to $51,120.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
Illinois Non-MSA FFIEC Adjusted Median Family Income				
2016 ($58,000)	<$29,000	$29,000 to <$46,400	$46,400 to <$69,600	≥$69,600
2017 ($60,400)	<$30,200	$30,200 to <$48,320	$48,320 to <$72,480	≥$72,480
2018 ($63,900)	<$31,950	$31,950 to <$51,120	$51,120 to <$76,680	≥$76,680
Source: The Federal Financial Institutions Examination Council				

According to the 2010 U.S. Census data, there were 28,073 families in the AA. The distribution of families by income level was 5,558 (19.8 percent) low-income, 4,548 (16.2 percent) moderate-income, 6,569 (23.4 percent) middle-income, and 11,426 (40.7 percent) upper-income.

According to the 2015 ACS Census data, there were 27,621 families in the AA. The distribution of families by income level was 5,662 (20.5 percent) low-income, 4,944 (17.9 percent) moderate-income, 6,132 (22.2 percent) middle-income, and 10,883 (39.4 percent) upper-income. Between 2016 and 2018, the percentage of families in the AA living below the poverty level was stable.

Housing Characteristics and Home Affordability

The 2010 U.S. Census reported total housing units of 45,788 in the AA. Of the total number of housing units, 32,625 or 71.3 percent were owner-occupied, 8,620 or 18.8 percent were renter-occupied, and 4,543 or 9.9 percent were vacant. There were no housing units located in low-income CTs; 7.3 percent (2,382) of owner-occupied units, 8.9 percent (767) of occupied rental units, and 8.7 percent (395) of vacant units, were located in moderate-income CTs, respectively. Additionally, 2,948 or 7.5 percent of all single family (1-4 units) homes and 21 or 1 percent of all multifamily housing units were located in moderate-income CTs. The weighted average median housing value was approximately 3.1 times the income of low-income borrowers and 1.9 times the income of moderate-income borrowers. The median age of housing stock in the moderate-income CTs of the AA was 60 years compared to the overall median age of 52 years.

The 2015 ACS Census reported total housing units of 46,161 in the AA. Of the total number of housing units, 31,936 or 69.2 percent were owner-occupied, 8,308 or 18 percent were renter-occupied, and 5,917 or 12.8 percent were vacant. There were no housing units located in low-income CTs; 11.4 percent (3,641) of owner-occupied units, 12.3 percent (1,022) of occupied rental units, and 15.4 percent (911) of vacant units, were located in moderate-income CTs, respectively. Additionally, 4,667 or 12 percent of all single family (1-4 units) homes and 174 or 8.3 percent of all multifamily housing units were located in moderate-income CTs. The weighted average median housing value was approximately 3.1 times the income of low-income borrowers and 1.9 times the income of moderate-income borrowers. The median age of housing stock in the moderate-income CTs of the AA decreased to 56 years; however, still behind the overall median age of 50 years.

One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making $31,950 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI in the AA) could afford a $148,792 mortgage with a payment of $799 per month. A moderate-income borrower making $51,120 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI in the AA) could afford a $238,068 mortgage with a payment of $1,278 per month. This illustrates that low- and moderate-income borrowers could qualify for a mortgage loan based on the median housing value in the AA with an estimated payment of $550. According to Realtor.com data, the median housing value in the AA was $89,570 in 2016 and $102,510 in 2018, reflecting a percent change of 14.5 percent from 2016 to 2018.

Employment Factors

According to BLS data, the annual unemployment rate across the AA ranged from a high of 7.1 percent in 2016 to a low of 3.7 percent in 2018. The annual unemployment rate for the state of Illinois ranged from a high of 5.8 percent in 2016 to a low of 4.3 percent in 2018, lagging behind the national unemployment rate over the same period.

Annual Unemployment Rates 2016-2018			
Area	**2016**	**2017**	**2018**
Christian County	6.4%	5.3%	5.3%
Effingham County	4.7%	3.8%	3.7%
Fayette County	6.6%	5.6%	5.3%
Montgomery County	7.1%	5.8%	5.9%
Shelby County	5.7%	4.5%	4.3%
State of Illinois	5.8%	4.9%	4.3%
National	4.9%	4.4%	3.9%
Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted.			

Economic Conditions

According to Moody's Analytics, *The best of this business cycle is over for Illinois, but the labor market will pull in the right direction for a few more quarters if private services maintain momentum. Population loss and troubled state finances will limit IL's long-term potential.* The top five employment sectors in the AA are Professional and Business Services, Education and Health Services, Leisure and Hospitality Services, Retail Trade, and Manufacturing. Some of the major employers in the AA include Community Unit School District 308, Community Unit School District 40, HSHS St. Anthony's Memorial Hospital, the John A Graham Correctional Center, the Taylorville Correctional Center, and the Vandalia Correctional Center.

Community Contacts

We reviewed a recent OCC contact with a community-based development organization that serves Christian, Effingham, Fayette, Montgomery, and Shelby Counties. The contact identified affordable housing opportunities and financial literacy as the primary needs in the local communities.

Scope of Evaluation in Illinois

We conducted full-scope reviews for both the St. Louis MSA and the Illinois Non-MSA. Greater weight was placed on the Illinois Non-MSA, where a majority of the bank's deposits (56.7 percent) are located and a majority of the bank's loan originations (56.8 percent) occurred during the evaluation period. Primary products reviewed for the Lending Test were home mortgage loans in the St. Louis MSA and the Illinois Non-MSA, business loans in the St. Louis MSA only, and consumer loans in the Illinois Non-MSA only. For the CD Test, the bank's level of CD Lending, Qualified Investments, and CD Services were reviewed for both the St. Louis MSA and the Illinois Non-MSA.

Refer to Appendix A for more information.

LENDING TEST

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

Based on full-scope reviews, the bank's lending performance in the state of Illinois is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits a reasonable geographic distribution of loans in the state. Our analysis is based only on the bank's performance in moderate-income CTs, as there are no low-income CTs in the either the St. Louis MSA or the Illinois Non-MSA.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans throughout the bank's AAs is reasonable. As a result of the 2015 ACS, the number of moderate-income CTs increased from five to seven in the St. Louis MSA and from three to five in the Illinois Non-MSA. Based on these changes, we placed more weight on the bank's geographic distribution performance during the 2017-2018 evaluation period. The additional moderate-income CTs were close in proximity to branches in both AAs, which improved the bank's opportunity to lend to moderate-income CTs in a very competitive environment.

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

<u>St. Louis MSA</u>

For 2016, the distribution of home mortgage loans reflects poor dispersion. The bank's percentage of home mortgage loans (2.2 percent) originated in moderate-income CTs was well below both the percentage of owner-occupied housing units in moderate-income geographies (9.9 percent) and the percentage of loans originated and purchased (7 percent) by all reporting lenders in those geographies (the aggregate comparator).

In 2017 and 2018, the bank's distribution of home mortgage loans reflects excellent dispersion. The bank's percentage of home mortgage loans in moderate-income CTs (19.3 percent) significantly exceeded both the percentage of owner-occupied housing units in moderate-income CTs (14.5 percent) and the aggregate percentage of loans originated and purchased in those geographies (13.9 percent).

Illinois Non-MSA

For 2016, the distribution of home mortgage loans reflects poor dispersion. The bank's percentage of home mortgage loans originated in moderate-income CTs (3.6 percent) was below both the percentage of owner-occupied housing units in moderate-income geographies (7.3 percent) and the aggregate percentage of loans originated and purchased in those geographies (6.1 percent).

In 2017 and 2018, the bank's distribution of home mortgage loans reflects excellent dispersion. The bank's percentage of home mortgage loans originated in moderate-income CTs (11.7 percent) exceeded both the percentage of owner-occupied housing units in moderate-income CTs (11.4 percent) and the aggregate percentage of loans originated and purchased in those geographies (8.5 percent).

Small Loans to Businesses

The bank exhibits a reasonable geographic distribution of small loans to businesses within the St. Louis MSA.

Refer to Table Q in 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.

St. Louis MSA

For 2016, the bank's percentage of loans in moderate-income CTs (10 percent) exceeded both the percentage of businesses located in moderate-income CTs (8.9 percent) and the aggregate percentage of loans originated and purchased in those geographies (6.2 percent).

In 2017 and 2018, the bank's percentage of loans in moderate-income CTs (10 percent) was below both the percentage of businesses located in moderate-income CTs (15.6 percent) and the aggregate percentage of loans originated and purchased in those geographies (12.2 percent).

Consumer Loans

The bank exhibits an excellent geographic distribution of consumer loans within the Illinois Non-MSA.

Refer to Table U in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of consumer loans.

Illinois Non-MSA

For 2016, the bank's percentage of loans to consumers in moderate-income CTs (15 percent) significantly exceeded the percentage of households located in moderate-income CTs (7.6 percent). There is no aggregate comparator for consumer lending.

For 2017 and 2018, the bank's percentage of loans to consumers in moderate-income CTs (25 percent) significantly exceeded the percentage of households located in moderate-income CTs (11.6 percent).

Lending Gap Analysis

We reviewed summary reports and maps, and analyzed the bank's home mortgage, business, and consumer lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among families of different income levels in the AAs. In evaluating the borrower distribution of home mortgage loans, we considered several factors discussed under the Description of Operations in Illinois section above, including the percentage of families living at or below the poverty level, the median housing value in relation to low- and moderate-income levels, the median age of housing stock in the moderate-income CTs, the percentage of rental units in relation to owner-occupied units within the moderate-income CTs, and the strong level of competition faced by the bank. All of these factors impacted the bank's ability to lend to low- and moderate-income families.

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

<u>St. Louis MSA</u>

The overall distribution of home mortgage loans to borrowers of different income levels in the St. Louis MSA is reasonable. For 2016, the bank's percentage of home mortgage loans to low-income borrowers (10.1 percent) was well below the percentage of low-income families (16.8 percent) in the AA; however, it significantly exceeded the percentage of aggregate lending to low-income borrowers (5.8 percent). The bank's percentage of home mortgage loans to moderate-income borrowers (19.1 percent) significantly exceeded both the percentage of moderate-income families (16 percent) and the percentage of aggregate lending to moderate-income borrowers (15.8 percent) in the AA.

For 2017 and 2018, the bank's percentage of home mortgage loans to low-income borrowers (10.2 percent) was well below the percentage of low-income families (16.2 percent) in the AA; however, it exceeded the percentage of aggregate lending to low-income borrowers (7.7 percent). The bank's percentage of home mortgage loans to moderate-income borrowers (17 percent) was near to the percentage of moderate-income families (17.4 percent) and slightly below the percentage of aggregate lending to moderate-income borrowers (18.2 percent) in the AA.

<u>Illinois Non-MSA</u>

The overall distribution of home mortgage loans to borrowers of different income levels in the Illinois Non-MSA is reasonable. For 2016, the bank's percentage of home mortgage loans to low-income borrowers (14.4 percent) was well below the percentage of low-income families (19.8 percent) in the AA; however, it significantly exceeded the percentage of aggregate lending to low-income borrowers (7.1 percent). The bank's percentage of home mortgage loans to moderate-income borrowers (14.4 percent) was within a reasonable range below both the percentage of moderate-income families (16.2 percent) and the percentage of aggregate lending to moderate-income borrowers (18.4 percent) in the AA.

For 2017 and 2018, the bank's percentage of home mortgage loans to low-income borrowers (9.7 percent) was significantly below the percentage of low-income families (20.5 percent) in the AA; however, it exceeded the percentage of aggregate lending to low-income borrowers (8.9 percent). The bank's percentage of home mortgage loans to moderate-income borrowers (16.6 percent) was near to the percentage of moderate-income families (17.9 percent) and within a reasonable range below the percentage of aggregate lending to moderate-income borrowers (19.1 percent) in the AA.

Small Loans to Businesses

The bank exhibits an excellent distribution of loans to businesses of different sizes in the St. Louis MSA.

Refer to Table R in 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.

<u>St. Louis MSA</u>

For 2016, the bank's percentage of loans to small businesses (85 percent) exceeded the percentage of small businesses (80.8 percent) in the AA and significantly exceeded the percentage of aggregate lending to small businesses (50.5 percent).

For 2017 and 2018, the bank's percentage of loans to small businesses (80 percent) exceeded the percentage of small businesses (79.3 percent) in the AA and significantly exceeded the percentage of aggregate lending to small businesses (47.9 percent).

Consumer Loans

The bank exhibits an excellent distribution of consumer loans to borrowers of different income levels in the Illinois Non-MSA.

Refer to Table V in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of consumer loans.

<u>Illinois Non-MSA</u>

For 2016, the bank's percentage of consumer loans to low-income borrowers (35 percent) significantly exceeded the percentage of low-income households (23.6 percent) in the AA. The bank's percentage of consumer loans to moderate-income borrowers (40 percent) significantly exceeded the percentage of moderate-income households (16.1 percent) in the AA.

For 2017 and 2018, the bank's percentage of consumer loans to low-income borrowers (35 percent) significantly exceeded the percentage of low-income households (22.5 percent) in the AA. The bank's percentage of consumer loans to moderate-income borrowers (50 percent) significantly exceeded the percentage of moderate-income households (16.4 percent) in the AA.

Responses to Complaints

The bank did not receive any written complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Illinois is rated satisfactory.

Based on a full scope review, the bank exhibits adequate responsiveness to CD needs in the St. Louis MSA and the Illinois Non-MSA 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 assessment area(s). CD activities in the Illinois Non-MSA received more weight, as the majority of the bank's loans and deposits are located there. To provide perspective regarding the relative level of qualified CD loans and investments, we allocated a portion of the bank's tier one capital to each AA based on the percentage of the bank's deposits located in the respective AA as a means of comparative analysis.

During the evaluation period, CD activities in the St. Louis MSA totaled $1.1 million and represent 6.8 percent of allocated tier one capital ($16.5 million) as of December 31, 2018. CD activities in the Illinois Non-MSA totaled $3.3 million and represent 15.3 percent of allocated tier one capital ($21.6 million) as of December 31, 2018.

Overall, the bank provided CD activities during the evaluation period totaling $4.4 million, representing 11.6 percent of total tier one capital ($38.2 million) as of December 31, 2018.

Number and Amount of Community Development Loans

Community Development Lending by Assessment Area

Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
St. Louis MSA	5	583	-	-	2	542	-	-	7	1,125
Illinois Non-MSA	1	400	-	-	3	191	1	70	5	661
Total	**6**	**983**	**-**	**-**	**5**	**733**	**1**	**70**	**12**	**1,786**

Source: Bank Data
Due to rounding, totals may not equal

St. Louis MSA

The bank's level of CD lending provided adequate responsiveness to community credit needs in the St. Louis MSA. The bank originated seven CD loans totaling $1.1 million during the evaluation period. This represents 6.8 percent of the AA's allocated tier one capital ($16.5 million) as of December 31, 2018. CD loans consisted of the following:

- The bank originated five loans totaling $583,000 for the purchase or refinance of single- and/or multi-family rental properties providing affordable housing for low- and moderate-income residents throughout the AA.
- The bank originated two CD loans totaling $542,000 that promoted economic development through financing small businesses. A mix of approximately 10 full and part time jobs were created and a mix of approximately 13 full and part time jobs were retained, providing employment for low- and moderate-income persons.

Illinois Non-MSA

The bank's level of CD lending provided adequate responsiveness to community credit needs in the Illinois Non-MSA. The bank originated five CD loans totaling $661,000 during the evaluation period. This represents 3.1 percent of the AA's allocated tier one capital ($21.6 million) as of December 31, 2018. CD loans consisted of the following:

- The bank originated three CD loans totaling $191,000 that promoted economic development through financing small businesses. A mix of approximately 15 full and part time jobs were created, providing employment for low- or moderate-income persons.
- The bank originated one loan totaling $400,000 for the purchase of a multi-family rental property providing affordable housing for low- and moderate-income senior citizens in the AA.
- The bank originated one loan totaling $70,000 for the expansion of a small business located in a moderate-income CT.

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)**
St. Louis MSA	-	-	-	-	-	-	-	-	-	-
Illinois Non-MSA	8	2,594	1	50	9	100.0	2,644	100.0	-	-

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.*
*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.*

St. Louis MSA

The bank did not have any qualified investments in the St. Louis MSA during the evaluation period; however, the bank did make eight donations, totaling $797 to qualified organizations in the AA. Donations were primarily made to non-profit organizations with services benefiting low- and moderate-income individuals and families.

Competition for qualified investments in the St. Louis MSA is strong. There are limited qualified investments available, and it is often difficult for small community banks to compete with the large nationwide and regional banks in the MSA.

Illinois Non-MSA

The bank's level of qualified investments demonstrated adequate responsiveness to community needs and opportunities in the Illinois Non-MSA. Qualified investments consisted of $2.6 million in prior-period investments, $50,000 in current-period investments, and approximately $4,000 in donations, for a total of $2.65 million during the evaluation period. This represents 12.2 percent of the AA's allocated tier one capital ($21.6 million) as of December 31, 2018. Qualified investments consisted of the following:

- The bank retained $2.2 million in school district bonds purchased prior to the evaluation period. These bonds provided critical funding for school districts where a majority of students qualify for free or reduced-price meals under the U.S. Department of Agriculture National School Lunch Program[3].
- The bank retained one municipal bond for $376,000 purchased prior to the evaluation period. This bond provided funding for revitalization in a moderate-income CT, including improvement activities that help attract new, or retain existing, businesses or residents.
- The bank made a public welfare investment of $50,000 in a local community development corporation (CDC) during the evaluation period. The CDC uses these funds to assist low- and moderate-income families seeking affordable housing.

Additionally, the bank donated $4,261 to 46 non-profit organizations that provide an array of community services primarily for low- and moderate-income individuals and families. Services included by these organizations included food donations, healthcare, counseling for children and families, and educational and social outreach.

Extent to Which the Bank Provides Community Development Services

St. Louis MSA

The bank did not provide any qualified CD services within the St. Louis MSA during the evaluation, demonstrating poor responsiveness. Competition for qualified CD services in the MSA is strong; however, unlike CD investments, there are far more opportunities for small community bank involvement.

Illinois Non-MSA

The bank's level of qualified CD services demonstrated adequate responsiveness to community needs and opportunities in the Illinois Non-MSA. Four bank officers served in leadership positions in local qualifying organizations that provide community services to low- and moderate-income individuals and families, support economic development, and revitalize and stabilize areas within the AA. More than 300 service hours were provided within the AA during the evaluation period.

[3] Low-income children are eligible to receive reduced-price or free meals at school. Children in households with incomes below 130 percent of the poverty level or those receiving SNAP or TANF qualify for free meals. Those with family incomes between 130 and 185 percent of the poverty line qualify for reduced-price meals.

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.”

Lending Test		
Time Period Reviewed:	01/01/16 to 12/31/18	
Bank Products Reviewed:	Home Mortgage Loans, Business Loans, Consumer Loans	
Community Development Test		
Time Period Reviewed:	09/07/16 to 12/31/18	
Bank Products Reviewed	Community Development Loans, Community Development Investments, Community Development Services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
Illinois		
Illinois Non-MSA	Full-scope	Christian County: CTs 9587 – 9590 Effingham County: CTs 9501 – 9508 Fayette County: CTs 9505 – 9511 Montgomery County: CTs 9573 – 9580 Shelby County: CTs 9592, 9596
St. Louis MO-IL MSA	Full-scope	Bond County: CTs 9512 – 9515 Clinton County: CTs 9001 – 9003, 9004.01, 9004.02 Macoupin County: CTs 9568 – 9572 Madison County: CTs 4029, 4030.01, 4030.02, 4031.01, 4031.21, 4031.22, 4032, 4033, 4034.01, 4034.02, 4035.02, 4035.31, 4035.32, 4035.33, 4035.34, 4036.01, 4036.03, 4036.04, 4037.01, 4037.02, 4038.01, 4038.02

Appendix B: Summary of MMSA and State Ratings

RATINGS: BANK OF HILLSBORO			
Overall Bank:	**Lending Test Rating***	**CD Test Rating**	**Overall Bank/State/ Rating**
Bank of Hillsboro	Satisfactory	Satisfactory	Satisfactory
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 arrogate 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 S. **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. The table also presents aggregate peer data for the years the data is available. 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 assessment area.

Table T. **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 thousand) 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 U. **Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

Table V. **Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

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
Illinois Non-MSA	111	12,994	55.5	1,854	0.0	0.0	0.0	7.3	3.6	6.1	74.0	84.7	71.4	18.7	11.7	22.5	0.0	0.0	0.0
St. Louis MSA	89	11,996	44.5	7,091	0.0	0.0	0.0	9.9	2.2	7.0	59.4	71.9	55.1	30.7	25.8	38.0	0.0	0.0	0.0
Total	**200**	**24,990**	**100.0**	**8,945**	**0.0**	**0.0**	**0.0**	**8.9**	**3.0**	**6.8**	**65.0**	**79.0**	**58.5**	**26.1**	**18.0**	**34.7**	**0.0**	**0.0**	**0.0**

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 **2017-18**

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
Illinois Non-MSA	145	13,670	62.2	1,582	0.0	0.0	0.0	11.4	11.7	8.5	69.3	86.2	70.0	19.3	2.1	21.5	0.0	0.0	0.0
St. Louis MSA	88	13,825	37.8	5,530	0.0	0.0	0.0	14.5	19.3	13.9	46.0	58.0	39.1	39.5	22.7	47.0	0.0	0.0	0.0
Total	**233**	**27,495**	**100.0**	**7,112**	**0.0**	**0.0**	**0.0**	**13.3**	**14.6**	**12.7**	**54.9**	**75.5**	**46.0**	**31.7**	**9.9**	**41.3**	**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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

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
Illinois Non-MSA	111	12,994	55.5	1,854	19.8	14.4	7.1	16.2	14.4	18.4	23.4	20.7	23.7	40.7	45.9	37.0	0.0	4.5	13.8
St. Louis MSA	89	11,996	44.5	7,091	16.8	10.1	5.8	16.0	19.1	15.8	23.6	22.5	22.1	43.7	46.1	40.0	0.0	2.2	16.3
Total	**200**	**24,990**	**100.0**	**8,945**	**17.9**	**12.5**	**6.1**	**16.1**	**16.5**	**16.4**	**23.5**	**21.5**	**22.4**	**42.5**	**46.0**	**39.4**	**0.0**	**3.5**	**15.8**

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 **2017-18**

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
Illinois Non-MSA	145	13,670	62.2	1,582	20.5	9.7	8.9	17.9	16.6	19.1	22.2	22.1	22.6	39.4	49.0	33.1	0.0	2.8	16.4
St. Louis MSA	88	13,825	37.8	5,530	16.2	10.2	7.7	17.4	17.0	18.2	21.2	25.0	21.3	45.2	33.0	34.3	0.0	14.8	18.5
Total	**233**	**27,495**	**100.0**	**7,112**	**17.8**	**9.9**	**7.9**	**17.6**	**16.7**	**18.4**	**21.5**	**23.2**	**21.6**	**43.0**	**42.9**	**34.0**	**0.0**	**7.3**	**18.0**

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2016
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
St. Louis MSA	20	5,274	100.0	2,767	0.0	0.0	0.0	8.9	10.0	6.2	56.6	60.0	52.8	34.5	30.0	41.0	0.0	0.0	0.0	
Total	**20**	**5,274**	**100.0**	**2,767**	**0.0**	**0.0**	**0.0**	**8.9**	**10.0**	**6.2**	**56.6**	**60.0**	**52.8**	**34.5**	**30.0**	**41.0**	**0.0**	**0.0**	**0.0**	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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																				2017-18
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
St. Louis MSA	20	8,867	100.0	2,920	0.0	0.0	0.0	15.6	10.0	12.2	45.1	45.0	43.0	39.3	45.0	44.7	0.0	0.0	0.0	
Total	**20**	**8,867**	**100.0**	**2,920**	**0.0**	**0.0**	**0.0**	**15.6**	**10.0**	**12.2**	**45.1**	**45.0**	**43.0**	**39.3**	**45.0**	**44.7**	**0.0**	**0.0**	**0.0**	

Source: 2018 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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2016**

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
St. Louis MSA	20	5,274	100.0	2,767	80.8	85.0	50.5	5.6	15.0	13.6	0.0
Total	**20**	**5,274**	**100.0**	**2,767**	**80.8**	**85.0**	**50.5**	**5.6**	**15.0**	**13.6**	**0.0**

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 **2017-18**

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
St. Louis MSA	20	8,867	100.0	2,920	79.3	80.0	47.9	5.8	20.0	14.8	0.0
Total	**20**	**8,867**	**100.0**	**2,920**	**79.3**	**80.0**	**47.9**	**5.8**	**20.0**	**14.8**	**0.0**

Source: 2018 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 U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2016**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Illinois Non-MSA	20	105	0.0	0.0	0.0	7.6	15.0	75.3	80.0	17.0	5.0	0.0	0.0
Total	**20**	**105**	**0.0**	**0.0**	**0.0**	**7.6**	**15.0**	**75.3**	**80.0**	**17.0**	**5.0**	**0.0**	**0.0**

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Illinois Non-MSA	20	195	0.0	0.0	0.0	11.6	25.0	70.9	75.0	17.5	0.0	0.0	0.0
Total	**20**	**195**	**0.0**	**0.0**	**0.0**	**11.6**	**25.0**	**70.9**	**75.0**	**17.5**	**0.0**	**0.0**	**0.0**

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

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2016
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
Assessment Area:	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Illinois Non-MSA	20	105	100.0	23.6	35.0	16.1	40.0	17.7	15.0	42.7	10.0	0.0	0.0	
Total	**20**	**105**	**100.0**	**23.6**	**35.0**	**16.1**	**40.0**	**17.7**	**15.0**	**42.7**	**10.0**	**0.0**	**0.0**	

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2017-18
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
Assessment Area:	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Illinois Non-MSA	20	195	133.3	22.5	35.0	16.4	50.0	18.3	10.0	42.8	5.0	0.0	0.0	
Total	**20**	**195**	**133.3**	**22.5**	**35.0**	**16.4**	**50.0**	**18.3**	**10.0**	**42.8**	**5.0**	**0.0**	**0.0**	

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