



PUBLIC DISCLOSURE

January 13, 2020

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Citizens National Bank of Albion
Charter Number 14435

10 West Elm Street
Albion, IL 62806

Office of the Comptroller of the Currency

Indianapolis Field Office
8777 Purdue Road, Suite 105
Indianapolis, IN 46268

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

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Overall CRA Rating

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

The lending test is rated: Outstanding

The community development test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on outstanding performance in the State of Illinois. CNB originated a substantial majority of loans in its AA with an excellent distribution among borrowers and geographies of different income levels.
- The Community Development (CD) Test rating is based on satisfactory performance in the State of Illinois. CNB demonstrated adequate responsiveness to community development needs by engaging in a combination of community development loans, qualified investments, and community development services.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is more than reasonable. CNB's quarterly LTD ratio, as calculated on a bank-wide basis, averaged 91.0 percent over the 13-quarter period ending December 31, 2018. During this timeframe, the LTD ratio ranged from a low of 84.0 percent to a high of 95.4 percent. CNB's LTD ratio ranks third among the six banks with offices in the AA and total assets between \$82.2 and \$551.2 million. The LTD ratios for the other five banks ranged from 75.9 percent to 100.7 percent.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its assessment area (AA). CNB originated 87.5 percent of its total loans by number inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

The table below shows the number and dollar volume of loans originated inside and outside bank's AA. This data is based on a random sample of 20 consumer and 20 small business loans that were selected from activity which occurred between January 1, 2016 and December 31, 2018.

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		
	#	%	#	%		\$	%	\$	%	
Small Business	17	85.0	3	15.0	20	1,021	95.5	48	4.5	1,069
Consumer	18	90.0	2	10.0	20	87	80.6	21	19.4	108
Total	35	87.5	5	12.5	40	1,108	94.4	69	5.9	1,177

Source: Internal Bank Reports

Description of Institution

Citizens National Bank of Albion (CNB) is a federally chartered national bank and is wholly owned by Citizens Bancshares, Inc. (Citizens), a one-bank holding company headquartered in Albion, Illinois. CNB does not have any subsidiaries and did not engage in any merger/acquisition activity.

CNB serves five contiguous counties in southeastern Illinois and offers traditional banking products and services at each of its six offices. The main office is in Albion, Illinois, which is in Edwards County. In addition, CNB has two offices in Lawrence County, one in Richland County, one in Wayne County, and one in White County. Each office location has a deposit-taking ATM. CNB also has two additional ATMs in Edwards County; one of these ATMs takes deposits, but the other only dispenses cash. All counties in which CNB has offices and deposit-taking automated teller machines (ATMs) are part of the nonmetropolitan statistical area (Non-MSA) within Illinois. As such, the Illinois Non-MSA is CNB's only AA.

As of December 31, 2019, CNB had total assets of \$320.2 million and tier one capital of \$53.9 million. Total deposits equaled \$254.7 million or 79.5 percent of total assets, while gross loans and leases of \$217.1 million represented 67.8 percent. Approximately 54 percent of total deposits are assigned to CNB's main office in Edwards County. CNB's loan originations and loan portfolio composition indicate diversified lending among residential real estate, business, farm, and consumer loans. Based on the number and dollar volume of loan originations, business and consumer loans are considered the primary loan products for this evaluation.

The following tables provide a summary of CNB's deposits data, loan originations, and the portfolio composition.

Deposit Data June 30, 2019		
County	Deposit Amount (000s)	% of Total Deposits
Edwards	\$ 134,993	54.3%
Lawrence	\$ 29,412	11.8%
Richland	\$ 47,544	19.1%
Wayne	\$ 15,748	6.3%
White	\$ 20,803	8.4%
Total	\$ 248,500	100.0%

Source: FDIC Summary of Deposits Report for June 30, 2019

Loan Originations January 1, 2016 through December 31, 2018		
Loan Category	% of # of Loans Originated	% of \$ of Loans Originated
Residential Loans	6.8%	16.1%
Farm Loans	11.8%	33.4%
Business Loans	20.6%	37.2%
Consumer Loans	60.5%	13.3%
Total	100.0%	100.0%

Source: Internal Bank Report on Loan Originations in 2016, 2017, and 2018

Loan Portfolio Composition December 31, 2019			
Loan Category	Amount (\$000's)	Percent of Total Loans	Percent of Total Assets
Residential Loans	\$ 49,693	22.9%	15.5%
Farm Loans	\$ 84,221	38.8%	26.3%
Business Loans	\$ 68,403	31.5%	21.4%
Consumer Loans	\$ 12,097	5.6%	3.8%
Other Loans & Leases	\$ 2,691	1.2%	0.8%
Total Gross Loans	\$ 217,105	100.0%	67.8%

Source: Call Report for December 31, 2019

CNB does not have any legal, financial, or other impediments that hinder its ability to meet the credit needs of its AA. CNB was assigned a “Satisfactory” rating at its prior CRA Evaluation dated October 20, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation addresses CNB’s CRA performance from January 1, 2016 through December 31, 2018. We assessed this performance using Intermediate Small Bank examination procedures, which consist of a Lending Test and a Community Development (CD) Test. The Lending Test reflects an evaluation of CNB’s record of meeting the credit needs of the AA through its lending activities. The CD Test reflects an evaluation of CNB’s responsiveness to the CD needs of the AA through loans, qualified investments, and services that have a CD purpose.

To evaluate CNB’s lending practices, we reviewed data from a representative sample of primary loan products. Based on the number and dollar volume of lending, we determined the primary loan products were business and consumer loans. Our sample included 80 loans in total and was divided equally between these two primary products. For each product, we selected 20 loans originated in 2016 and 20 loans originated in 2017 and 2018.

We performed a separate analysis for 2016 and 2017-2018 due to changes in the census data that became effective in 2017. We compared the bank’s lending performance in 2016 to demographic data from the 2010 U.S. Census, 2016 CRA Aggregate Data, and 2016 Dun & Bradstreet (D&B) Data. For

the 2017-2018, we compared the bank's performance to demographic data from the 2015 American Community Survey (ACS) census, 2018 CRA Aggregate Data, and 2018 D&B Data.

The evaluation of CNB's CD activities was based the responsiveness of all CD-purpose loans, qualified investments and services that occurred in 2016, 2017, and 2018.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was 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. 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. CNB operates in a single state, so its overall rating is the same as the rating for 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. The 2017 through 2018 analysis period represents the majority of the evaluation period and received more weight than the 2016 analysis period.

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

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

State Rating

State of Illinois

CRA rating for the State of Illinois¹: Satisfactory

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on outstanding performance in the IL Non-MSA AA. CNB originated a substantial majority of loans in its AA with an excellent distribution among borrowers and geographies of different income levels.
- The Community Development (CD) Test rating is based on satisfactory performance in the IL Non-MSA AA. CNB demonstrated adequate responsiveness to community development needs by engaging in a combination of community development loans, qualified investments, and community development services

Description of Institution's Operations in Illinois

CNB conducts business from six office locations in southeastern Illinois. See the *Description of Institution* section for additional details. Based on this footprint, CNB has one AA, the IL Non-MSA. The total number of low- and moderate-income tracts within the AA was the same in 2017-2018 as in 2016, but the income designation for four CTs changed following the 2015 ACS. These changes include two CTs shifting from middle- to moderate-income and two CTs shifting from moderate-income to middle. The number of middle-income CTs designated as underserved and distressed also changed. Seven CTs were designated as underserved in 2016, while six CTs were underserved and eight were distressed in 2017.

According to US census data, the population of the AA declined by about one percent. The number of families and households also declined by 8.4 percent and 6.5 percent, respectively. Currently, around 11.0 percent of families and 14.0 percent of households are below the poverty level. Unemployment rates for each county in the AA trended with the statewide rate and continued to show improvement during the evaluation period. The following table summarizes the annual unemployment rates:

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.

Unemployment Rates			
	2016	2017	2018
State of Illinois	5.8%	4.9%	4.3%
Edwards County	5.8%	4.7%	4.5%
Lawrence County	7.4%	6.1%	5.9%
Richland County	5.9%	4.8%	4.7%
Wayne County	8.5%	6.2%	5.6%
White County	6.6%	4.9%	4.3%

Source: Bureau of Labor Statistics

Competition for deposits is notable due to the number and size of financial institutions with offices in the AA. As of June 30, 2019, FDIC Deposit Data showed CNB and 13 other national and state banks operated 36 offices in Edwards, Lawrence, Richland, Wayne, and White Counties. CNB's six office with deposits of \$248.5 million represents a market share of 14.7 percent; this market share ranks CNB second. In comparison to the competitors, CNB does not have any office outside the five-county area.

Notable competition for loan products also exists. Aggregate HMDA data for 2018 shows 90 lenders originated or purchased home loans in the AA. Aggregate CRA data shows 44 lenders originated or purchased 634 business loans in 2018.

A contact from a not-for-profit, community action organization that serves three of the counties in the AA provided insight on potential credit and community development needs. The contact perceives there is an ongoing need for a fixed-rate loan product with escrow. The contact indicated that more state grant money is available and believes such a loan program is needed to support and facilitate homeownership for first time buyers. The contact feels a fixed-rate mortgage loan with escrow provides the first-time homebuyer with payment stability and reduces the likelihood of default.

Contextual research also indicates a need for revitalization and stabilization of underserved areas in the AA. In 2016, seven of the 18 middle-income CTs were considered as underserved, middle-income, nonmetropolitan tracts in remote rural areas. In 2018, six of the seven CTs were still considered underserved. The underserved CTs are in the counties of Edwards and Richland.

Illinois Non-MSA AA

Table A – Demographic Information of the Assessment Area for 2016						
Assessment Area: Citizens Albion						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	21.7	78.3	0.0	0.0
Population by Geography	71,212	0.0	18.1	81.9	0.0	0.0
Housing Units by Geography	33,073	0.0	18.5	81.5	0.0	0.0
Owner-Occupied Units by Geography	22,551	0.0	15.4	84.6	0.0	0.0
Occupied Rental Units by Geography	6,888	0.0	29.7	70.3	0.0	0.0
Vacant Units by Geography	3,634	0.0	16.8	83.2	0.0	0.0
Businesses by Geography	3,362	0.0	28.5	71.5	0.0	0.0
Farms by Geography	474	0.0	8.6	91.4	0.0	0.0
Family Distribution by Income Level	19,768	23.0	19.9	23.1	33.9	0.0
Household Distribution by Income Level	29,439	27.4	16.4	19.0	37.1	0.0
Median Family Income Non-MSAs - IL		\$54,499	Median Housing Value			\$67,323
			Median Gross Rent			\$490
			Families Below Poverty Level			11.0%

Source: 2010 U.S. Census and 2016 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.

Table A – Demographic Information of the Assessment Area for 2017-2018						
Assessment Area: Citizens Albion						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	21.7	78.3	0.0	0.0
Population by Geography	70,460	0.0	23.4	76.6	0.0	0.0
Housing Units by Geography	31,617	0.0	18.2	81.8	0.0	0.0
Owner-Occupied Units by Geography	21,135	0.0	15.5	84.5	0.0	0.0
Occupied Rental Units by Geography	6,382	0.0	25.6	74.4	0.0	0.0
Vacant Units by Geography	4,100	0.0	20.3	79.7	0.0	0.0
Businesses by Geography	3,298	0.0	24.1	75.9	0.0	0.0
Farms by Geography	437	0.0	13.5	86.5	0.0	0.0
Family Distribution by Income Level	18,112	22.3	19.2	22.5	36.0	0.0
Household Distribution by Income Level	27,517	25.2	17.3	18.7	38.8	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housing Value			\$74,158
			Median Gross Rent			\$530
			Families Below Poverty Level			10.7%

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

We performed a full-scope review of CNB's only AA, which is the IL Non-MSA. Refer to the table in Appendix A: Scope of Examination for additional information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review of the IL Non-MSA, the bank's lending performance in the state of Illinois is excellent. This conclusion is based on:

- the excellent geographic distribution of commercial and consumer loans,
- the excellent borrower distribution of commercial and consumer loans, and
- the absence of complaints regarding CNB's CRA performance.

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

Overall, the geographic distribution of small loans to businesses is excellent.

The geographic distribution of small loans to businesses in 2017-2018 was excellent. The bank's percentage of small loans to businesses in moderate-income CTs exceeded the percentage of businesses located in those geographies and aggregate lending. The geographic distribution of small loans in 2016 was inconsistent with the performance in 2017-18. In 2016, the geographic distribution was reasonable. The percentage of small loans to businesses in moderate-income CTs was below the percentage of businesses located in those geographies and aggregate lending.

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.

Consumer Loans

Overall, the geographic distribution of consumer loans is excellent. In 2017-2018, the bank's percentage of consumer loans in moderate-income CTs exceeded the percentage of households in those geographies. The geographic distribution of loans in 2016 was not inconsistent with the performance in 2017-2018.

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

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.

Small Loans to Businesses

Overall, the borrower distribution of small loans to businesses is excellent.

The borrower distribution of small loans to businesses in 2017-2018 was excellent. In 2017-2018, the percentage of small loans to small businesses (businesses with gross annual revenues of \$1.0 million or less) exceeded the percentage small businesses located in the AA and aggregate lending. The borrower distribution of small loans to small businesses in 2016 was not inconsistent with the performance in 2017-2018.

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.

Consumer Loans

Overall, the borrower distribution of consumer loans is excellent.

The borrower distribution of consumer loans in 2017-2018 is excellent. In 2017-2018, the percentage of loans to low-income borrowers was near to the percentage of low-income households in the AA. The percentage of loans to moderate-income households was near to the percentage of moderate-income households in the AA. The borrower distribution of consumer loans in 2016, was inconsistent with the performance in 2017-2018. In 2016, the borrower distribution was reasonable. The percentage of loans to low-income borrowers was below the percentage of low-income households in the AA. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income households

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

Responses to Complaints

During the evaluation period, CNB did not receive any complaints regarding its performance in helping to meet the credit needs of the AA.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area(s).

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 \$
IL Non-MSA	16	100.0	\$5,815	100.0

CNB originated 16 CD loans totaling \$5.8 million. These loans consisted of eight commercial loans and eight consumer loans. The commercial loans equaling \$5.3 million primarily helped to revitalize and stabilize moderate-income or remote rural underserved CTs by supporting operation and/or expansion of the businesses located in these geographies. This included two loans for \$3.7 million to maintain operations of the only local grocery store, which is located in a moderate-income CT and provides about 30 jobs. Another commercial loan for \$900,000 financed the expansion and remodel of a church located in an underserved, remote rural CT. The eight consumer loans for \$425,546 provided financing to four individuals after their homes and/or vehicles were damaged by severe weather; these borrowers reside in the moderate-income CT that was affected.

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)
IL Non-MSA	0	\$ 0	22	\$1,415	22	100.00	\$1,415	100.00	0	\$ 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.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the examination date.

CNB made 22 qualified investment totaling \$1.4 million during the evaluation period. The majority consists of three municipal bonds that supported projects which benefit LMI individuals or geographies. CNB invested \$1.1 million in two bonds that funded repairs, alternations, or improvements to schools in the Richland County School District, where more than 50 percent of students are from LMI families. CNB also invested \$250,000 in a bond that funded replacement or improvements to the electrical, waterworks, and sewerage systems for the City of Carmi, which is in a moderate-income CT. The remaining investment of about \$51,700 consisted of donations to 14 different organizations involved with economic development, revitalization/stabilization, or community services targeted to LMI individuals.

Extent to Which the Bank Provides Community Development Services

Thirteen CNB employees provided CD services to 12 different organizations, often serving in a leadership capacity as a board member or instructor. The organizations that CNB employees helped primarily provide community services to LMI individuals. For example, three individuals served as Advisory Board members and taught financial literacy programs in two school districts, where more than 50 percent of students are from LMI families. There were also two employees that participated as a board member and/or officer of two economic development organizations.

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	(01/01/16 to 12/31/18)	
Bank Products Reviewed	Small business loans and consumer loans Community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Illinois		
Portion of the Non-MSA	Full Scope	Counties of Edwards, Lawrence, Richland, Wayne, and White

Appendix B: Summary of MMSA and State Ratings

RATINGS Citizens National Bank of Albion			
	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
Overall Bank:			
Citizens National Bank of Albion	Outstanding	Satisfactory	Satisfactory
MMSA or State:			
State of Illinois	Outstanding	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 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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
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
IL Non-MSA	20	2,792	100.0	585	0.0	0.0	0.0	28.5	15.0	24.3	71.5	85.0	75.7	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	2,792	100.0	585	0.0	0.0	0.0	28.5	15.0	24.3	71.5	85.0	75.7	0.0	0.0	0.0	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
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
IL Non-MSA	20	1,084	100.0	634	0.0	0.0	0.0	24.1	30.0	21.8	75.9	70.0	78.2	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	1,084	100.0	634	0.0	0.0	0.0	24.1	30.0	21.8	75.9	70.0	78.2	0.0	0.0	0.0	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
IL Non-MSA	20	2,792	100.0	585	75.8	75.0	44.3	5.9	15.0	18.4	10.0
Total	20	2,792	100.0	585	75.8	75.0	44.3	5.9	15.0	18.4	10.0
<i>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</i>											

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
IL Non-MSA	20	1,084	100.0	634	72.9	75.0	46.7	6.4	15.0	20.6	10.0
Total	20	1,084	100.0	634	72.9	75.0	46.7	6.4	--	20.6	--
<i>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</i>											

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	
IL Non-MSA	20	175	100.0	0.0	0.0	18.7	15.0	81.3	85.0	0.0	0.0	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0</i>														

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	
IL Non-MSA	20	94	100.0	0.0	0.0	17.9	45.0	82.1	55.0	0.0	0.0	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
IL Non-MSA	20	175	100.0	27.4	10.0	16.4	30.0	19.0	20.0	37.1	40.0	0.0	0.0	
Total	20	175	100.0	27.4	10.0	16.4	30.0	19.0	20.0	37.1	40.0	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	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
IL Non-MSA	20	94	100.0	25.2	20.0	17.3	15.0	18.7	15.0	38.8	40.0	0.0	10.0	
Total	20	94	100.0	25.2	20.0	17.3	15.0	18.7	15.0	38.8	40.0	0.0	10.0	

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