



PUBLIC DISCLOSURE

May 23, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Village Bank & Trust Company
Charter Number: 25202

234 West Northwest Highway
Arlington Heights, Illinois 60004

Office of the Comptroller of the Currency

Midsized Bank Supervision
425 S. Financial Place, Suite 1700
Chicago, IL 60605

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of Village Bank and Trust Company, N.A with respect to the Lending, Investment, and Service Tests:

Performance Levels	Village Bank and Trust Company Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory		X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on the performance in the state of Illinois rating area. The excellent geographic distribution of loans in its Assessment Area (AA), the high level of community development (CD) lending, and the relatively high use of flexible lending programs was considered in arriving at the overall Lending Test rating.
- The Investment Test rating is based on performance in the state of Illinois rating area. The bank has an excellent level of qualified CD investments and grants across the rating area and at the regional level.
- The Service Test rating is based on performance in the state of Illinois rating area. Branch distribution in the bank’s AA was good. The bank is a leader in providing CD services.

Lending in Assessment Area

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

The bank originated and purchased 6.8 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	76	52.8	68	47.2	144	36,996	41.5	52,227	58.5	89,223
Small Business	2,229	6.5	32,127	93.5	34,356	265,442	19.2	1,119,976	80.8	1,385,418
Small Farm	0	0.0	1	100.0	1	0	0.0	170	100.0	170
Consumer	28	84.8	5	15.2	33	78	49.4	80	50.6	158
Total	2,333	6.8	32,198	93.2	34,534	302,516	20.5	1,172,453	79.5	1,474,969

Nationwide lending programs utilized by the bank impact the ratio of loans located inside the bank's AA. The bank purchases loans from First Insurance Funding (FIFCO), an affiliate of the bank, which impacts the ratio of loans located inside the bank's AA. During the evaluation period, the bank purchased 31,742 loans from FIFCO. A significant majority of the FIFCO purchased loans are located outside of the bank's AA and revenue data was not provided.

Small business loans are the bank's primary product based on volume of loans by number. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography.

Description of Institution

Village Bank and Trust Company, N.A. (VBT or the bank) is a \$2.3 billion intrastate bank headquartered in Arlington Heights, Illinois. VBT is a wholly-owned subsidiary of Wintrust Financial Corporation (WFC). As of December 31, 2021, WFC is a \$50 billion financial services holding company located in Rosemont, Illinois. WFC's business strategy includes working with customers in the Chicago metropolitan area, southern Wisconsin, and northwest Indiana by way of their 15 wholly-owned banking subsidiaries and more than 150 bank locations.

WFC locations provide a wide range of lending and deposit products and services to their customers. WFC residential mortgage applications are referred to Wintrust Mortgage (WM). WM, a division of Barrington Bank & Trust Company, is a national residential mortgage operation with offices throughout the United States. WM offers a wide variety of retail mortgages and originates nearly all WFC mortgages. Loans that cannot be sold on the secondary market are purchased by any one of the 15 WFC banks for their portfolio.

WFC, through its FIFCO affiliate, is one of the largest commercial insurance premium finance companies in the United States. FIFCO makes loans to businesses of different sizes to finance the insurance premiums they pay on their commercial insurance policies. FIFCO is a leader in premium finance and life insurance premium finance transactions.

WFC banks offer specialty products including wealth management, lease financing, insurance premium financing, short-term account receivable financing, administrative services outsourcing, franchise lending, firm partnership loans, and financial solutions for mission-based organizations.

As of December 31, 2021, VBT reported total loans of \$1.8 billion, representing 78 percent of total assets. VBT has three primary loan types that make up 99 percent of the total loan portfolio. The primary loan products include approximately \$1.3 billion of commercial loans or 73 percent of total loans, \$390 million of consumer loans or 21 percent of total loans, and \$114 million in residential lending 6 percent of the total loan portfolio. VBT had tier 1 capital of \$207 million.

The bank operates eight full-service locations and eight deposit-taking Automated Teller Machines (ATMs). Since the last Public Evaluation, VBT closed two branches in Arlington Heights, Illinois within the bank's AA.

According to the June 30, 2021 Federal Deposit Insurance Corporation (FDIC) deposit market share report, VBT had a 0.3 percent market share making it the 33rd largest deposit holder out of 452 financial institutions in the state of Illinois.

COVID-19 Pandemic

In March 2020, the World Health Organization declared COVID-19 a pandemic. In response to the pandemic, the United States was under a shelter-in-place order in an effort to limit the spread of the virus. Due to the shelter-in-place orders, certain businesses deemed non-essential were shut down or limited in operations. The pandemic limited the ability of bank personnel to provide in-person services. The evaluation of the bank's performance takes into consideration the impact of the pandemic.

During the evaluation period, the bank strategically targeted certain CD investments and services to assist in addressing economic hardships associated with the pandemic mitigation practices, advancing the bank's commitment towards alleviating economic disparities among LMI communities. To meet Small Business Administration (SBA) initial guidance on the Payment Protection Program (PPP), the bank modified its technology systems to accommodate small businesses and nonprofit organizations. A PPP loan is SBA-backed and helped businesses keep their workforce employed during the pandemic.

Additionally, opportunities for virtual service deliveries were limited by the capacity of community organizations, and the ability of low- and moderate-income (LMI) families and small businesses to access virtual technology.

This disproportionately affected blue-collar jobs, in which LMI individuals are primarily employed. To assist their borrowers experiencing financial difficulty due to the pandemic, the bank offered various services and relief options. The following were relief and services offered by the bank:

- Loan deferrals and modifications.
- Waived all late fees on consumer loans and lines of credit.
- Waived early redemption fees on CDs and waived overdraft and insufficient funds fees.
- Rolled out DocuSign to safely execute the documentation required for deposit, loan, and deferral plans.
- Utilized video conference technology to conduct Money Smart and other financial education sessions.
- Offered hardship assistance, forbearance plan options, and waived late fees for mortgages.

There were no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period. There were no acquisitions or mergers during the evaluation period that would have affected the bank's CRA performance or the OCC's analysis. VBT's CRA performance was rated "Outstanding" in the last Public Evaluation, performed by the Federal Reserve Bank (FRB), dated September 19, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's performance under the large bank Lending, Investment, and Service Tests. The evaluation period is September 20, 2016 through December 31, 2021.

The OCC permits depository institutions that demonstrate the ability to operate safely and soundly and in compliance with applicable laws, regulations, and policies, to convert to national bank charters. In 2019, the bank elected to apply for a national bank charter with regulatory supervision transferring from the FRB to the OCC upon approval. The national charter was issued on October 1, 2019, which is considered the "conversion date." Since the conversion date was less than six months of the evaluation period year, we did not assess the bank's retail lending performance for 2019 in this evaluation. The bank received consideration of CD activities conducted since the previous CRA evaluation.

In evaluating the bank's lending performance, the OCC analyzed home mortgage loans the bank provided as they are not a Home Mortgage Disclosure Act (HMDA) reporter. For small loans made to businesses and small loans to farms the OCC analyzed the bank reported loans under the CRA. At the bank's request, the OCC considered consumer loan products, which consisted of secured and unsecured loans. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. Multifamily loans and small loans to farms are not primary loan products; therefore, we did not evaluate these products separately. However, we did consider multifamily loans meeting the CD definition as part of the evaluation of CD lending.

The OCC compared bank loan data for all applicable years in the state rating area to: demographic data using the U.S. Census American Community Survey (ACS); Federal Financial Institutions Examination Council (FFIEC) adjusted median family incomes; 2020 Dun and Bradstreet (D&B) small business demographic data; 2020 peer mortgage loan data reported under HMDA; and 2020 peer small business data reported under CRA. Banks are not required to report data on consumer loans; therefore, no peer aggregate data was available against which to compare bank consumer lending.

In evaluating the geographic distribution and borrower income criteria under the Lending Test, the 2020 through 2021 data was analyzed and aggregated. Performance tables O, P, Q, R, U, and V in Appendix D include data covered by the analysis period 2020 through 2021.

Bank and branch deposit data is as of June 30, 2021, based on information from the FDIC. The distribution of bank branches is compared to U.S. Census 2015 ACS population estimates.

We also evaluated retail services, qualified investments, and CD services from September 20, 2016 through December 31, 2021. Qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are addressed in this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same 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 the State Rating section for details regarding how the full-scope AA was selected. Refer to Appendix A, Scope of Examination, for a list of full-scope AAs. There are no limited-scope AAs.

Ratings

The bank's overall rating was based on the state rating.

Refer to the Scope section under the State Rating section for details regarding how the area was weighted in arriving at the respective ratings.

In evaluating the bank's performance under the Lending Test, we placed greater weight on the bank's distribution of small business loans based on the volume. Equal weight was given to the bank's distribution of home mortgage loans and consumer loans. Small loans to farms were not evaluated based on the volume.

Generally, equal emphasis is given to the geographic distribution of loans and lending by borrower income level. Greater weight was generally given to performance compared to aggregate lenders than to performance relative to demographic factors in lending. The analysis included both the number and dollar volume of lending. The analysis of lending, except for CD loans, emphasized the number of loans rather than the dollar volume because it is a better indicator of the number of businesses or individuals served.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) 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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Illinois

CRA rating for the State of Illinois:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- The bank exhibits an excellent geographic distribution of loans in its AA.
- The bank exhibits a good distribution, particularly in its AA, of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- The bank has a significant level of qualified investments.
- Its service delivery systems are reasonably accessible to geographies and individuals or different income levels in its AA.
- The bank is a leader in providing CD services.

Description of Institution's Operations in State of Illinois

VBT designated one AA in Illinois, which consists of two counties with the Chicago-Naperville-Elgin MSA (Chicago MSA). The Chicago MSA consists of two MSAs which were combined for analysis purposes. These MSAs are the Chicago-Naperville-Evanston MSA and Lake County-Kenosha County MSA. For purposes of this evaluation, the Chicago-Naperville-Evanston MSA consists of Cook and DuPage County, and the Lake County-Kenosha County MSA consists of Lake County.

VBT's AA consists of 605 contiguous census tracts (CTs) located in the northwestern portion of Illinois. The bank has delineated the AA with 516 out of 1,319 CTs in Cook, 47 out of 216 CTs in DuPage, and 42 out of 154 CTs in Lake County. The branches are located in the cities of Arlington Heights, Des Plaines, Mount Prospect, Park Ridge, Prospect Heights, and Rolling Meadows.

The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies. According to 2015 U.S. Census data, the AA consists of 605 CTs, of which there are 17 low-income and 135 moderate-income.

Chicago-Naperville-Elgin MSA

The following table provides a summary of demographics, housing, and business information for the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	605	2.8	22.3	29.1	44.8	1.0
Population by Geography	2,550,147	2.3	24.0	31.6	41.8	0.4
Housing Units by Geography	1,052,288	2.1	23.3	31.0	43.2	0.4
Owner-Occupied Units by Geography	587,841	0.9	15.8	33.3	49.9	0.2
Occupied Rental Units by Geography	383,708	3.8	33.3	27.6	34.5	0.8
Vacant Units by Geography	80,739	3.5	30.5	30.0	35.4	0.6
Businesses by Geography	214,169	1.0	17.2	30.5	50.8	0.5
Farms by Geography	2,384	0.7	15.3	32.5	51.6	0.0
Family Distribution by Income Level	597,757	20.3	15.4	18.0	46.3	0.0
Household Distribution by Income Level	971,549	22.9	15.1	16.6	45.4	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$308,505
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137	Median Gross Rent			\$1,095
			Families Below Poverty Level			8.3%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Community Contacts

The OCC made three community contacts in the AA during the evaluation period, which included one global nonprofit housing agency and two Chicagoland nonprofit organizations focused on neighborhood revitalization and economic development in LMI areas. The OCC also reviewed the Lake County, Illinois 2019 Annual Action Plan for Housing and Urban Development Funding. Community contacts indicated that the following are needs within the bank’s AA.

- Home mortgages in LMI areas,
- Home improvement loans regardless of appraisal gaps,
- Willingness to accept a wide range of mortgage down payment and closing cost assistance,
- Financing to owners of multifamily buildings for acquisition and rehabilitation,
- Small loans to small businesses,
- Board and Committee volunteerism,
- Financial education, student loan counseling, debt management counseling, and

- Homebuyer counseling programs.

Housing Characteristics

The housing market in the AA is challenged as demand exceeds housing supply, and prices continue to trend upwards. Rentals have also not been affordable for LMI families. The lack of affordable housing has made it difficult for LMI families to purchase homes in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC adjusted median family income (AMFI) in the AA is \$87,100. According to Realtor.com data, the median housing value in the Chicago MSA is \$299,900 and \$312,500 in 2020 and 2021, respectively, reflecting a 4.2 percent increase.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$43,550 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$202,814 mortgage with a payment of \$1,089 per month. A moderate-income borrower making \$69,680 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$324,503 mortgage with a payment of \$1,742 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,678.

Scope of Evaluation in State of Illinois

The Chicago MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

For the analysis of distribution of loans to geographies with different income levels, greater consideration was given to the bank's performance in moderate-income geographies based on the greater number of CTs.

For the borrower distribution analysis, consideration was given to the impact that income and housing costs have on limiting homeownership opportunities of LMI individuals and families. Additionally, consideration was given to the impact of home affordability for LMI borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. It is difficult for many LMI borrowers to afford a home, as the area's median housing value is typically too high for conventional mortgage loan qualification. As such, more emphasis was placed on the bank's lending results to LMI borrowers relative to the aggregate performance rather than the demographic data.

In performing the analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses. A significant portion of the bank's small loans to businesses did not contain revenue information, as permitted under the CRA reporting requirements. Many of these loans were acquired by FIFCO without revenue data or the loans were originated under a loan product that does not consider business revenue in underwriting. We took into

consideration the bank’s significant nationwide niche lending programs when assessing the bank’s performance regarding lending within its AA versus outside AA lending. More emphasis was placed on the bank’s lending relative to aggregate performance.

Consideration was given to the bank’s business strategy focus, and the fact as noted above that there are considerably more lenders originating or purchasing loans in the AA than there are depository institutions with branch offices. Lenders include local and non-local depository institutions, as well as non-bank financial institutions.

In performing the analysis of investments, competition in the AA is high, with large interstate, regional, and community banks competing for qualified investments in the market.

The Service Test includes an evaluation of the availability and effectiveness of a bank’s systems for delivering retail banking services, including the current distribution of the bank’s branches among different income geographies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN STATE OF ILLINOIS

LENDING TEST

The bank’s performance under the Lending Test in the state of Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

The bank’s rank and market share in loans is stronger than the rank and market share in deposits. We considered the substantial volume of loans originated through a subsidiary for insurance premium financing in the analysis.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Chicago MSA	76	2,229	0	108	2,413	98.6	100.0
Statewide	--	--	--	35	35	1.4	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. "--" data not available.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Chicago MSA	36,996	265,442	0	82,973	385,411	93.6	100.0
Statewide	--	--	--	26,496	26,496	6.4	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. "--" data not available.

According to FDIC Deposit Market Share data as of June 30, 2021, the bank ranked 25th out of 119 banks with a deposit market share of 0.4 percent in the AA, which is equivalent to the top 16.6 percent of banks in the AA.

The bank is not required to report its mortgage lending data and is not included in the 2020 peer mortgage data. The five largest home mortgage lenders have captured 33 percent of the market with 695 HMDA lenders, based upon the 2020 peer mortgage data. Home mortgage lending is not a primary product, and the bank generally refers home mortgage loans to an affiliate, WM.

According to 2020 peer small business data, the bank ranked 26th in the market of 329 small business lenders with a market share of 1.6 percent. The five largest small business lenders have captured 31.1 percent of the market. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in its AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent distribution.

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

The proportion of home mortgage loans originated or purchased in LMI geographies exceeds both the percentage of owner-occupied housing units and the aggregate distribution of all reporting lenders.

Small Loans to Businesses

The geographic distribution of small business loans reflects excellent distribution.

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.

The proportion of small business loans originated or purchased in low-income geographies was below the percentage of small businesses and near to the aggregate distribution of all reporting lenders. The proportion of small business loans originated or purchased in moderate-income geographies exceeds the percentage of small businesses and the aggregate distribution of all reporting lenders.

Consumer Loans

The geographic distribution of consumer loans reflects adequate distribution.

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.

The bank did not originate any consumer loans in low-income geographies during the evaluation period. The proportion of consumer originated or purchased loans in moderate-income geographies exceeds the percentage of households.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The distribution of home mortgage loans among individuals of different income levels is adequate.

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

The high cost of housing limits opportunities for low-income borrowers and the negative impact on economic conditions caused by the pandemic in 2020 may have limited opportunities for lending. These contexts are considered in the analysis.

The bank did not originate or purchase any home mortgage loans to low-income borrowers during the evaluation period. The proportion of home mortgage loans originated or purchased was below the percentage of moderate-income families and near to the aggregate distribution of all reporting lenders.

Small Loans to Businesses

The distribution of loans to businesses of different sizes is good.

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 origination and purchase of small loans to businesses.

The proportion of loans to small businesses originated or purchased was well below the proportion of small businesses and exceeds the aggregate distribution of all reporting lenders.

The bank originates a substantial volume of loans through FIFCO for insurance premium financing, which is a nationwide product underwritten without the collection of revenue data. Per Table R, 26.3 percent of the small business loans have no revenue data. Given this context, the performance under this criterion is considered good.

Consumer Loans

The distribution of consumer loans among individuals of different income levels is excellent.

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.

The proportion of consumer loans originated or purchased to LMI borrowers exceeds the percentage of LMI households.

Community Development Lending

The bank is a leader in making CD loans.

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

VBT made 108 CD loans totaling \$82.9 million, representing 40.1 percent of allocated tier 1 capital. CD loans included 16 loans totaling \$6 million supporting community service, 48 loans totaling \$29.2 million supporting affordable housing, five loans totaling \$9 million supporting economic development, and 39 loans totaling \$38.7 million supporting revitalization and stabilization efforts. Of the 108 CD loans, 23 totaling \$6.6 million were loan renewals.

Due to the pandemic in 2020, the SBA initiated the PPP loan program. The SBA implemented this program as a low-cost and forgivable loan program to help small businesses cover payroll costs, interest on mortgages, rent, and utilities during the pandemic. The bank originated 39 PPP loans totaling \$37.3 million that qualify as CD within the AA.

Examples of CD loans in the AA include:

- A \$6.5 million construction loan for a development with 44 affordable and supportive housing apartment units. The development is designed for people with chronic health conditions. The development will have no units at market rates and will be eligible for low-income housing tax credits (LIHTC).
- A \$2.5 million participation in a \$10 million line of credit (LOC) to a local village in the bank's AA. The LOC will support costs associated with a recently established Tax Increment Financing (TIF) district. The proceeds will be used for various purposes, such as purchasing the property, relocating the existing tenants, and redeveloping the area. It

will also allow the village to promptly respond to expressions of interest from existing property owners to improve, expand, or sell their property within the district. The purpose of a TIF district is to encourage development or redevelopment in areas of need. The funds can only be used for public improvements, which include land acquisition, site preparation, relocation costs, job training, and bond financing.

- A \$2.5 million commercial real estate loan to a borrower that participates in a state of Illinois program designed to help small businesses grow and expand, support business projects, create or retain jobs, and/or modernize. In order to qualify for this status, the company must be a minority, women, disabled, or veteran-owned business. The borrower is in the process of hiring new LMI employees. In addition, this loan will allow for additional working capital and accommodate future growth.
- A \$317,367 PPP loan and a \$150,000 revolving LOC to a nonprofit organization that provides treatment and counseling for at-risk families. The LOC was originated and renewed during the evaluation period. The organization aims to identify and solve problems before abuse occurs through therapeutic and supportive services, aimed to serve vulnerable families experiencing severe poverty.

Statewide

The bank originated 35 CD loans in the broader statewide area of Illinois totaling \$26.5 million. This included 26 loans totaling \$17.8 million supporting affordable housing, two loans totaling \$5 million supporting economic development, and seven loans totaling \$3.7 million supporting community service to LMI individuals. Of the CD loans, 16 totaling \$6.4 million were loan renewals.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. We considered the loan programs, which provided opportunities with direct benefit to LMI borrowers and small businesses within the AA.

Paycheck Protection Program

The bank made use of responsive flexible lending during the pandemic in 2020 by originating loans to stabilize small businesses and communities through the SBA PPP. The bank also worked with various nonprofit partners to increase awareness of PPP availability. During the evaluation period, the bank originated 1,046 PPP loans totaling \$216.6 million in the AA and a combined total of 1,642 PPP loans totaling \$397.1 million within the state of Illinois. This activity received positive consideration, as it provided stabilization of small businesses and communities.

Other Programs

Money Smart Everyday Loan is offered as an alternative to payday loans. These loans provide unsecured financing from \$500 to \$2,500 as an alternative to payday lenders with lower

interest rates and up to 24-month repayment terms. The bank originated 23 loans totaling \$50,950 in the AA.

Money Smart Certificate of Deposit Secured Loan is offered to assist persons with very low credit scores and to those with non-established or blemished credit histories. The loan is secured by a certificate of deposit that grows as the loan is repaid in monthly installments. There is no upfront deposit required from the borrower. After payoff, customers receive use of the money from the certificate of deposit and reporting of credit history. During the evaluation period, the bank originated 10 Money Smart loans totaling \$11,000 in the AA.

Easy Access LOC and Easy Access Installment programs are small and micro loans offered to small businesses, which are a noted need in the community. These programs are targeted to help meet the needs of small businesses with revenues of less than \$1.0 million with short-term LOC funding to support inventory and account receivables as well as support with secured and unsecured term loans. During the evaluation period, the bank originated 127 Easy Access LOC totaling \$5.2 million and 21 Easy Access Installment loans totaling \$459,173 in the AA.

The bank participates in SBA programs including the 504-loan program, 7a loan program, and the Express program. During the evaluation period, a total of 46 loans totaling \$18.9 million were originated under these programs in the AA.

INVESTMENT TEST

The bank’s performance under the Investment Test in the state of Illinois is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Chicago MSA is good.

The bank has a significant level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives. Qualified investments and grants primarily help address community needs for affordable housing, economic development, and community services.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago MSA	7	2,491	320	9,555	327	95.6	12,046	81.8	4	879
Regional	2	2,301	13	373	15	4.4	2,675	18.2	2	840

* 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.

Qualified investments total \$12 million, with current period investments of \$9.6 million, prior period investments of \$2.5 million, and qualified grants of \$846,090. Investments benefiting the AA during the evaluation represented 5.8 percent of allocated tier 1 capital. The bank also had \$879,385 in unfunded commitments remaining at the end of the evaluation period, which consisted of four loan pools.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$2.3 million in bonds, small business investment corporations (SBIC), and mortgage-backed securities pools funding housing in LMI areas in the AA.

Examples of qualified investments in this AA include:

- \$1.3 million in two Equity Equivalent Investments (EQ2) to nonprofit Community Development Financial Institutions that are involved in affordable housing, social service, and economic initiatives that benefit LMI families. An EQ2 is an investment of equity in a nonprofit lender which enhances the nonprofit’s flexibility to support LMI communities and small businesses.
- Over \$2 million in three Minority Deposit Institutions (MDI) serving the region. The MDI provide safe and affordable financial products to individuals in LMI tracts, as well as financial counseling, seminars, and further investments into the community. This investment supports services for individuals with poor credit histories, a lack of financial literacy, or a lack of financial resources.
- A \$500,000 investment in one of the nation’s leading LIHTC syndicators. The LIHTC plays an integral role in creating affordable housing options, revitalizing communities, and strengthening local economies.

Examples of qualified donations in this AA include:

- \$55,000 in grants to a nonprofit organization which provides scholarships to low-income families. The organization advocates for innovation in education, and preferentially provides scholarships for families with an income of less than \$45,510.
- Two donations totaling \$36,364 to an organization that use their funds exclusively for LMI individuals or individuals living in LMI geographies to provide assistance with daycare for LMI families, elder abuse, family shelters, nutrition for low-income elderly, and summer programs for teens in at risk neighborhoods.
- Two donations totaling \$10,096 to an organization which helps small business owners succeed. The organization provides free business advising services, legal clinics, and other workshops.
- \$6,667 to an organization which seeks to help LMI disadvantaged children to move from school into a career through one-on-one mentoring. The organization has aided more than 80 teens living in the AA.

Regional

We also considered qualified investments that served a broader regional area, including neighboring states and the bank’s AA. In the current period, the bank invested \$139,800 in SBICs that have an unfunded commitment of \$610,199.

The bank continued to hold two prior period SBIC investments totaling \$1.3 million that have an unfunded commitment of \$230,094.

In addition, the bank made grants in a long-term commitment which provided \$233,333 in funding to a university whose goal is to address tuition costs which strain LMI families. While partnering with WFC banks, this donation provides support through scholarships to low-income students as well as first generation students.

SERVICE TEST

The bank’s performance under the Service Test in the state of Illinois is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Chicago MSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Chicago MSA	100.0	8	100.0	0.0	12.5	37.5	50.0	2.3	24.0	31.6	41.8

The bank has eight branches in the AA, with one in a moderate-income CT. There are no branches in low-income CTs. The percentage of the branch located in a moderate-income area is below the percentage of the population residing in the geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Chicago MSA	1	2	0	0	+1	-2

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. In October 2017, the bank opened a new moderate-income CT branch in Rolling Meadows. The tract changed designation from a moderate-income CT to a middle-income CT during 2017 based on the 2015 ACS. Although the branch was in a middle-income CT at the end of the evaluation period, opening the branch in what was a moderate-income tract merits positive consideration. In April 2021, the bank permanently closed two branches located in upper-income CTs in Arlington Heights and Prospect Heights.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking. VBT has eight ATMs in the AA, of which one is a deposit-taking ATM in a moderate-income CT of the AA. We did not place significant weight on alternative delivery systems, as the bank did not maintain any metrics to demonstrate the effectiveness of the bank's alternative delivery systems in helping meet the needs of LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

During the pandemic, the bank offered additional services such as curbside banking, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds and overdraft fees, and early withdrawal penalties. With lobby closures, branch personnel worked to help meet community banking needs through drive-through facilities and digital banking services. The bank received positive consideration for these activities in response to the pandemic.

Community Development Services

The bank is a leader in providing CD services.

CD Services were effective and responsive in addressing the community's needs. During the evaluation period, 58 bank employees from various lines of business partnered with 71 organizations and contributed a total of 6,392 hours supporting LMI individuals and families. This included serving on committees and boards for 55 various organizations that promote affordable housing, community services, and economic developments for LMI communities within the AA. Services reflected ongoing relationships with several organizations in the AA.

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

- A bank employee provided 675 hours as a board member and committee chair to a charitable nonprofit organization. The mission of the organization is to assist low-income families living and working in the NW Suburbs in securing rental housing. These families also receive mentoring and rent support to aid in their financial stability.
- A bank employee provided 398 hours of board service to an organization that provides senior services to LMI individuals. Services include meals on wheels, abuse

intervention, assistance programs, tax counseling, health screenings and transportation. The employee also prepared tax returns for the residents of the facility.

- Eleven bank employees provided 363 hours of community service to a nonprofit licensed and accredited child welfare agency. This community-based organization provides emergency and temporary housing to children and adolescents that are abused, neglected, dependent and in need of supervision. Several services are offered such as foster care, group homes for boys and girls, and a transitional living program.
- A bank employee provided 204 hours of board service to a nonprofit small business lender that offers loans and grants to entrepreneurs. The purpose is to guide small business vision through financial solutions which also aids in business growth, job creation and community impact.

FDIC Money Smart

The bank leverages the FDIC Money Smart financial education program, which helps individuals of all ages enhance their financial skills and create positive banking relationships. The Money Smart program provides basic financial concepts to students in kindergarten through 12th grade and training for adults in many different life stages and financial situations. The program reaches adults new to the country, adults with disabilities, adults starting or changing careers, and adults going through significant life events such as expanding their families or purchasing or renting their first homes. Curriculum includes education on preventing elder financial exploitation and for small businesses related to starting and managing a business.

During the evaluation period, the bank employees provided 1,355 hours using the FDIC Money Smart Financial Program to small business and LMI individuals in the AA.

PPP Resource Centers

In response to the pandemic in 2020, WFC developed, implemented, and staffed PPP Resource Centers. The bank staffed the centers with small business lenders that were knowledgeable in the PPP application portal and process. The resource centers made expertise and equipment available to small businesses that did not have access to these types of resources. Two bank employees provided 20 hours of support to the resource centers which were open from January through April 2021.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	HMDA and CRA: 01/01/2020 to 12/31/2021 CD Activities & Retail Services: 09/20/2016 to 12/31/2021	
Bank Products Reviewed:	Home mortgage, small business, and consumer loans. Community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Illinois		
Chicago-Naperville-Elgin MSA	Full-Scope	Counties of Cook (partial), DuPage, and Lake

Appendix B: Summary of State Ratings

Village Bank & Trust Company Ratings				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
Village Bank	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State:				
State of Illinois	Outstanding	High Satisfactory	High Satisfactory	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business,

or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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 loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/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 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 2020-2021

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Chicago MSA	76	36,996	100.0	0.9	1.3	0.9	15.8	32.9	13.2	33.3	22.4	27.8	49.9	43.4	57.9	0.2	0.0	0.2
Total	76	36,996	100.0	0.9	1.3	0.9	15.8	32.9	13.2	33.3	22.4	27.8	49.9	43.4	57.9	0.2	0.0	0.2

Source: 2015 ACS Census; 01/01/2020 - 12/31/2021 Bank Data, 2020 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 2020-2021

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Chicago MSA	76	36,996	100.0	20.3	--	2.9	15.4	11.8	11.9	18.0	1.3	20.3	46.3	26.3	53.8	0.0	60.5	11.0
Total	76	36,996	100.0	20.3	--	2.9	15.4	11.8	11.9	18.0	1.3	20.3	46.3	26.3	53.8	0.0	60.5	11.0

Source: 2015 U.S Census; 01/01/2020 - 12/31/2021 Bank 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 **2020-2021**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago MSA	2,229	265,442	100.0	1.0	0.8	0.9	17.2	20.3	17.5	30.5	34.7	32.2	50.8	43.8	49.0	0.5	0.4	0.3
Total	2,229	265,442	100.0	1.0	0.8	0.9	17.2	20.3	17.5	30.5	34.7	32.2	50.8	43.8	49.0	0.5	0.4	0.3

Source: 2019 D&B Data; 01/01/2020 - 12/31/2021 Bank 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 **2020-2021**

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
Chicago MSA	2,229	265,442	100.0	95,590	85.8	43.1	38.4	6.3	30.6	7.9	26.3
Total	2,229	265,442	100.0	95,590	85.8	43.1	38.4	6.3	30.6	7.9	26.3

Source: 2019 D&B Data; 01/01/2020 - 12/31/2021 Bank 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 2020-2021

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago MSA	28	78	100.0	2.0	0.0	22.7	28.6	31.0	35.7	43.8	35.7	0.4	0.0
Total	28	78	100.0	2.0	0.0	22.7	28.6	31.0	35.7	43.8	35.7	0.4	0.0

Source: 2015 U.S Census; 01/01/2020 - 12/31/2021 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 2020-2021

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
Chicago MSA	28	78	215.4	22.9	32.1	15.1	25.0	16.6	17.9	45.4	7.1	0.0	17.9
Total	28	78	215.4	22.9	32.1	15.1	25.0	16.6	17.9	45.4	7.1	0.0	17.9

Source: 2015 U.S Census; 01/01/2020 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0