



PUBLIC DISCLOSURE

June 27, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Wheaton Bank & Trust Company
Charter Number: 25203

100 North Wheaton Avenue
Wheaton, IL 60187

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 Satisfactory.

The following table indicates the performance level of Wheaton Bank & Trust Company, NA with respect to the Lending, Investment, and Service Tests:

Performance Levels	Wheaton Bank & Trust Company Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
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 adequate geographic distribution of loans in the bank’s Assessment Area (AA), good borrower distribution among businesses of different sizes, and excellent level of community development (CD) lending is 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 adequate 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 adequate. The bank was a leader in providing CD services in the AA.

Lending in Assessment Area

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

The bank originated and purchased 5.6 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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	37	30.8	83	69.2	120	23,030	25.9	65,973	74.1	89,003
Small Business	1,821	5.4	31,983	94.6	33,804	230,224	18.2	1,031,903	81.8	1,262,127
Consumer	42	73.7	15	26.3	57	1,854	96.6	65	3.4	1,919
Total	1,900	5.6	32,081	94.4	33,981	255,108	18.9	1,097,941	81.1	1,353,049
<i>Source: 01/01/2020 - 12/31/2021 Bank Data Due to rounding, totals may not equal 100.0%</i>										

Nationwide lending programs utilized by the bank impact the ratio of loans located inside the bank's AAs. 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 31,631 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

Wheaton Bank and Trust, N.A. (WBT or the bank) is a \$2.9 billion intrastate bank headquartered in Wheaton, Illinois. WBT 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 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, WBT reported total loans of \$1.8 billion, representing 63.2 percent of total assets. WBT has three primary loan types that make up 96 percent of the total loan portfolio. The primary loan products include approximately \$1.1 billion of commercial loans or 59 percent of total loans, \$522 million of consumer loans or 28 percent of total loans, and \$162 million in residential lending or 9 percent of the total loan portfolio. WBT had tier 1 capital of \$234.2 million.

The bank operates seven full-service locations and seven deposit-taking Automated Teller Machines (ATMs). Since the last Public Evaluation, WBT did not open or close any branches.

According to the June 30, 2021 Federal Deposit Insurance Corporation (FDIC) deposit market share report, WBT had a 0.5 percent market share making it the 24th 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 low- and moderate-income (LMI) communities. To meet Small Business Administration (SBA) initial guidance on the Paycheck 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 ability of 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 Certificates of Deposit 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. WBT's CRA performance was rated "Outstanding" in the last Public Evaluation, performed by the Federal Reserve Bank of Chicago (FRB), dated April 29, 2019.

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 April 30, 2019 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 a national bank charter. 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 bank 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 a sample of home mortgage loans originated by the bank. The bank is not a Home Mortgage Disclosure Act (HMDA) reporter, and a Loan Application Register (LAR) was not available for our analysis of mortgage lending. 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 April 30, 2019 through December 31, 2021. Qualifying activities performed in response to the significant impact of the 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: Satisfactory

The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending activity reflects good responsiveness to credit needs in the bank's AA.
- The bank exhibits an adequate geographic distribution of loans in its AA.
- The bank exhibits a good distribution 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 an adequate level of qualified investments, particularly those that are not routinely provided by private investors, although rarely in a leadership position.
- 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 the State of Illinois

WBT designated one AA in Illinois, which is the Chicago-Naperville-Evanston Metropolitan Division (Chicago MD). For purposes of this evaluation, the Chicago MD consists partial counties of DuPage and Will.

WBT's AA consists of 181 contiguous census tracts (CTs) located in the northwestern portion of Illinois. The bank has delineated the AA with 152 out of 216 CTs in DuPage County and 29 out of 152 CTs in Will County.

The branches are located in the cities of Bolingbrook, Glen Ellyn, Naperville, and Wheaton.

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 181 CTs, of which one is low-income and eight are moderate-income.

Chicago-Naperville-Evanston MD

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

Table A – Demographic Information						
Metropolitan Statistical Area: Chicago MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	181	0.6	4.4	30.9	64.1	0.0
Population by Geography	831,730	0.4	3.8	31.2	64.5	0.0
Housing Units by Geography	315,189	0.5	3.6	33.2	62.8	0.0
Owner-Occupied Units by Geography	223,310	0.2	3.2	27.9	68.7	0.0
Occupied Rental Units by Geography	74,612	1.2	4.6	46.5	47.7	0.0
Vacant Units by Geography	17,267	0.8	4.6	44.0	50.7	0.0
Businesses by Geography	77,364	0.4	3.0	25.0	71.7	0.0
Farms by Geography	1,207	0.2	5.0	29.4	65.5	0.0
Family Distribution by Income Level	213,751	12.2	12.9	17.3	57.5	0.0
Household Distribution by Income Level	297,922	15.2	12.5	15.9	56.4	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$309,330
			Median Gross Rent			\$1,184
			Families Below Poverty Level			4.6%
<i>Source: 2015 ACS Census 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. 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 for acquisition and rehabilitation of multifamily buildings,
- 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. The lack of affordable housing has made it difficult for LMI families to purchase homes and to rent housing 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.

Scope of Evaluation in the State of Illinois

The Chicago MD 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 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 originated 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.

A near to branch is a branch in a middle- or upper-income (MUI) CT that is proximate to an LMI area and serves that area. These branches are in a reasonable distance from LMI CT they are serving. The bank provided adequate evidence showing that a middle-income CT branch serves customers in LMI CTs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF ILLINOIS

LENDING TEST

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

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. The bank’s rank and market share in loans is weaker 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. Given the level of competition from other reporting lenders in the AA, WBT’s business lending market share is good.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Chicago MD	37	1,821	0	97	1,955	98.8	100.0
Statewide	--	--	--	23	23	1.2	--

*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 MD	23,030	230,224	0	99,472	352,726	89.1	100.0
Statewide	--	--	--	43,037	43,037	10.9	--

*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 9th out of 65 banks with a deposit market share of 3.5 percent in the AA, which is equivalent to the top 13.8 percent of banks in the AA.

The bank is not required to report its mortgage lending data and it is not included in the 2020 peer mortgage data. The five largest home mortgage lenders have captured 29.3 percent of the market based on 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 14th in the market of 321 small business lenders with a market share of 1.9 percent. The bank's rank and market share in loans is weaker than the deposit rank and market share. The five largest small business lenders have captured 49.7 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate 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 bank did not originate or purchase home mortgage loans in low-income geographies. The proportion of home mortgage loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units and exceeds the aggregate distribution of all reporting lenders. The bank's performance in the moderate-income geographies represents one home mortgage loan originated or purchased during the evaluation period.

Small Loans to Businesses

The geographic distribution of small business loans reflects good 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 is significantly below the percentage of small businesses and 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 proportion of consumer loans originated or purchase in low-income geographies exceeds the percentage of households and is below the percentage of households in moderate-income geographies. The bank's performance in low-income geographies represents one consumer loan originated or purchased during the evaluation period.

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.

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 proportion of home mortgage loans originated or purchased exceeds the percentage of low-income families and the aggregate distribution of all reporting lenders. The proportion of home mortgage loans originated or purchased is significantly below the percentage of moderate-income families and the aggregate distribution of all reporting lenders.

The high cost of housing limits opportunities for LMI borrowers and the negative impact on economic conditions caused by the pandemic in 2020 limited opportunities for lending. Given this context, the performance under this criterion is considered adequate.

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 is well below the proportion of small businesses but exceeds the aggregate distribution of all reporting lenders.

The bank purchases 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, 16.0 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 institution's consumer loan originations and purchases.

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

WBT made 97 CD loans totaling \$99.5 million, representing 42.5 percent of allocated tier 1 capital. CD loans included 20 loans totaling \$7.8 million supporting community service, 14 loans totaling \$10.2 million supporting affordable housing, 11 loans totaling \$57.6 million supporting economic development, and 52 loans totaling \$23.9 million supporting revitalization and stabilization efforts. Of the 97 CD loans, 33 totaling \$58.6 million represent 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 51 PPP loans totaling \$13.9 million that qualify as CD within the AA.

Examples of CD loans in the AA include:

- \$5.6 million in loans to a nonprofit organization supporting affordable housing. The loans consisted of a \$1.2 million revolving line of credit (RLOC), a \$1.2 million term loan, and two RLOC that were renewed twice at \$750,000 and \$880,000. Funds helped an organization expand its facilities so that it can benefit more persons experiencing homelessness and transition them to self-sufficiency. The organization provides transitional housing, educational outreach services, and advocates for homeless persons and affordable housing.
- \$1.1 million loan supporting community services. Funds helped an organization expand its operations for its food pantry collection, distribution, and warehousing to benefit more low-income persons.
- \$500,000 RLOC renewed three times to a nonprofit organization supporting community services to LMI individuals and families. Funds helped an organization's working capital needs as it works to prevent families from falling into homelessness. The organization provides food and clothing bank services and rental and mortgage payment assistances to low-income persons.
- \$280,940 in loans to a nonprofit organization supporting community services. The loans consisted of a \$75,000 RLOC renewed three times and a \$55,940 PPP loan. Funds helped an organization's ongoing efforts to provide literacy training to low-income adults with limited English language proficiencies, helping them to obtain better jobs and navigate life's obstacles.

Statewide

The bank originated 23 CD loans in the broader statewide area of Illinois totaling \$43 million. This included 20 loans totaling \$7.9 million supporting affordable housing, a loan totaling \$3.5 million supporting economic development, a loan totaling \$3 million supporting community service to LMI individuals, and a loan totaling \$28.6 million supporting revitalization and stabilization efforts. Of the CD loans, 11 totaling \$3.4 million were loan renewals.

Examples of CD loans include:

- \$3.5 million construction loan supporting economic development. Funds helped a local business expand its operations with a new headquarters in a moderate-income geography, which helped generate 30 new jobs.
- A \$3.0 million loan supporting a nonprofit organization that serves LMI individuals and communities. Funds supported the operations of an organization that provides health and human services to LMI persons with physical, developmental, intellectual, and mental health challenges. The organization provides behavioral and health services, day-care services, residential services, and employment services.

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 1,089 PPP loans totaling \$183.1 million in the AA and a combined total of 1,529 PPP loans totaling \$405.5 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 seven loans totaling \$13,600 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 13 Money Smart loans totaling \$8,500 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 accounts receivables as well as support through secured and unsecured term loans. During the evaluation period, the bank originated 114 Easy Access LOC totaling \$8.3 million and 12 Easy Access Installment loans totaling \$473,519 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 24 loans totaling \$14.6 million were originated under these programs in the AA.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago MD is adequate.

The bank has an adequate level of qualified CD investments and grants, particularly those that are not routinely provided by private investors, 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. Qualified investments and grants primarily supported 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 MD	8	3,437	146	9,978	154	84.62	13,415	81.42	2	1,933
Regional	5	2,427	23	635	28	15.38	3,062	18.58	6	1,724

* 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 \$13.415 million, with current period investments of \$9.978 million, prior period investments of \$3.437 million, and qualified grants of \$334,938. Investments benefiting the AA during the evaluation represent 5.73 percent of allocated tier 1 capital. The bank also had \$1.9 million in unfunded commitments remaining at the end of the evaluation period, which consisted of two 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 \$3.437 million in eight investments, one LIHTC, two bonds, one mortgage-backed security, three loan pools, and the CRA Investment Fund (mutual fund) benefiting the AA.

Examples of qualified grants in this AA include:

- Seven grants totaling \$91,936 to a nonprofit organization for affordable housing. The organization's mission is to transition homeless families to self-sufficiency by working with partners to provide mentoring, housing, and supportive services.
- Nine grants totaling \$23,250 to a nonprofit organization that serves LMI individuals. The mission of the organization is to provide interim and permanent housing, coupled with support services that help individuals work toward becoming self-sufficient.
- Four grants totaling \$12,100 to a nonprofit organization which serves LMI individuals. The organization's mission is to end hunger in the community by providing food and leadership and by uniting and mobilizing resources to empower people to be self-sufficient.

The bank complemented its investments with in-kind contributions.

- \$76,936 in leased commercial space to a nonprofit organization, which serves as their headquarters and operations center. The mission of the organization is to transition homeless families to self-sufficiency by working with partners to provide mentoring, housing, and supportive services. The organization's vision is a community where all families are healthy, financially stable, and living in affordable housing. The lease was initiated in April 2018.

Regional

We also considered qualified investments that served the broader regional area, including neighboring states. In the current period, the bank invested \$365,648 that consist of two small business investment corporations (SBIC). In addition, the bank made 21 grants totaling \$269,642 to organizations that provide community services to LMI individuals and for economic development.

Over \$1.8 million supported eight MDI serving the region that 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.

The bank continued to hold five prior period investments totaling \$2.427 million that have an unfunded commitment of \$1.7 million in six SBIC.

The bank made 12 grants in a long-term commitment which provided \$233,322 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 MD is good.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA. The near to branch in a middle-income CT received positive consideration to the Service Test.

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 MD	100.0	7	100.0	0.0	0.0	14.3	85.7	0.4	3.8	31.2	64.5

The bank has seven branches in the AA, with no branches in LMI CTs. The percentage of the branches located in a LMI area is significantly below the percentage of the population residing in the geographies. Consideration was given to the bank's AA with a small percentage of the population living in one low-income CT and eight moderate-income CTs. The bank provided internal data indicating the extent to which a middle-income CT branch is being used by customers residing in nearby LMI CTs, which received positive consideration to the Service Test. The bank data considered included a substantial volume of loan applications from LMI individuals and bank customers that reside in LMI geographies. In addition, the middle-income branch is in close proximity of LMI CTs.

The bank did not open or close branches during the evaluation period.

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. WBT has seven deposit-taking ATMs in the AA, of which none are in LMI CTs. 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, 36 bank employees from various lines of business partnered with 51 organizations and contributed a total of 5,166 hours supporting LMI individuals and families. This included serving on committees and boards for 48 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:

- An employee served 498 hours as a board member and treasurer of a public charity within its AA. This charity's mission is to foster philanthropy and connect donors to area needs by providing donations to organizations that assist low-income individuals and families.
- An employee served 433 hours as a board member for a nonprofit organization dedicated to providing support to small businesses, including marketing efforts, mentoring services, and assistance with staffing needs.
- An employee served 320 hours as a board member to an organization with a mission of providing and mobilizing services needed to support low-income families. Some of these services include counseling, youth mentoring, early childhood education, and family self-sufficiency.
- Two employees provided 116 hours as board and committee members to a nonprofit organization that helps increase accessibility to housing for LMI individuals. The organization offers workshops, counseling, and coaching centered around financial literacy, self-sufficiency, and housing.
- Two employees provided 105 hours as board and committee members to a nonprofit organization focused on providing free transitional housing to LMI families. The organization also offers services such as financial mentoring, employment counseling, and tutoring.

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 656 hours using the FDIC Money Smart Financial Program to small business and LMI individuals in the AA.

Cristo Rey Work Study Program

The bank participates in the Cristo Rey St. Martin Work Study program. Cristo Rey's mission is to partner educators, businesses, and communities, to enable students to fulfill their aspirations for a lifetime of success. As part of the Corporate Work Study Program, the bank's staff serves as mentors that provide students with training on different roles and

responsibilities in the bank and professionalism in the workplace. The school transports all students participating in the program by bus to the bank daily. All students participating in Cristo Rey are required to participate in a work study program through which they finance the majority of cost of their education. Students gain real-world job experience, grow in self-confidence, realize the relevance of their education and graduate ready to succeed in college and life. St. Martin students are all from LMI families.

During the assessment period, several bank employees provided 3,216 hours as student mentors for the work study program. The hours represented the duration of time the students spent on-the-job with their mentors at the bank.

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. Bank employees provided 168 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: 04/30/2019 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-Evanston MD	Full-Scope	Partial DuPage and Will Counties

Appendix B: Summary of MMSA and State Ratings

Wheaton Bank & Trust Ratings				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Rating
Wheaton Bank	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
State:				
State of Illinois	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

(*) 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 MD	37	23,030	100.0	0.2	0.0	0.2	3.2	2.7	2.1	27.9	32.4	23.1	68.7	64.9	74.6	0.0	0.0	0.0
Total	37	23,030	100.0	0.2	0.0	0.2	3.2	2.7	2.1	27.9	32.4	23.1	68.7	64.9	74.6	0.0	0.0	0.0

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 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 MD	37	23,030	100.0	12.2	5.4	2.3	12.9	2.7	10.1	17.3	5.4	17.0	57.5	56.8	58.2	0.0	29.7	12.4
Total	37	23,030	100.0	12.2	5.4	2.3	12.9	2.7	10.1	17.3	5.4	17.0	57.5	56.8	58.2	0.0	29.7	12.4

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	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate
Chicago MD	1,821	230,224	100.0	0.4	0.1	0.3	3.0	3.6	2.9	25.0	18.7	26.6	71.7	77.6	70.2	0.0	0.0	0.0
Total	1,821	230,224	100.0	0.4	0.1	0.3	3.0	3.6	2.9	25.0	18.7	26.6	71.7	77.6	70.2	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2020 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 **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 MD	1,821	230,224	100.0	31,965	84.5	50.8	37.8	6.0	33.2	9.5	16.0
Total	1,821	230,224	100.0	31,965	84.5	50.8	37.8	6.0	33.2	9.5	16.0

Source: 2020 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the 2020-2021 Geography

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 MD	42	1,854	210.0	0.4	2.4	3.5	2.4	32.6	26.2	63.5	69.0	0.0	0.0
Total	42	1,854	210.0	0.4	2.4	3.5	2.4	32.6	26.2	63.5	69.0	0.0	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 2020-2021 Borrower

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 MD	42	1,854	100.0	15.2	38.1	12.5	21.4	15.9	14.3	56.4	26.2	0.0	0.0
Total	42	1,854	100.0	15.2	38.1	12.5	21.4	15.9	14.3	56.4	26.2	0.0	0.0

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