



## **PUBLIC DISCLOSURE**

May 28, 2019

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**First National Bank of Pana**  
Charter Number 13478

306 South Locust Street  
Pana, Illinois 62557

Office of the Comptroller of the Currency

Champaign Field Office, Harris Center, 3001 Research Road, Suite E-2, Champaign, IL 61822

**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 lending test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on the State of Illinois rating, which is Outstanding.
- Lending to businesses and farms of different sizes is excellent.
- The bank's loan-to-deposit ratio is more than reasonable considering the bank's size, financial condition, and credit needs of the assessment areas (AAs).

### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit ratio is more than reasonable. The loan-to-deposit ratio averaged 78.8 percent over the past 18 quarters. The timeframe used for this calculation represents the first quarter-end after the start of the last CRA evaluation through March 31, 2019.

Over the past 18 quarters, the bank's loan-to-deposit ratio reflected an increasing trend from a low of 69.4 percent to a high of 87.8 percent at December 31, 2018. The bank's average loan to deposit ratio was higher than the average of similarly situated banks within the AAs. We reviewed the loan-to-deposit ratios for all banks with total assets between \$49.5 million and \$249.1 million headquartered in Christian, Shelby, and Macon Counties. This group of six similarly situated banks averaged a loan-to-deposit ratio of 65.4 percent. First National Bank of Pana's (FNB Pana) loan-to-deposit ratio average was the third highest in this group.

FNB Pana also referred long-term fixed-rate home loan applicants to a third party mortgage broker. Between 2016 and 2018, the mortgage broker facilitated the origination of 36 home loans totaling \$4.6 million that FNB Pana referred. This further supports management's efforts to provide access to loans.

### **Lending in Assessment Area**

A majority of the bank's loans are originated inside its AAs. The bank originated and purchased 80.0 percent of its total loans inside the bank's AAs during the evaluation period. This analysis was performed at the bank, rather than the AA, level.

| <b>Lending Inside and Outside of the Assessment Area</b> |                 |      |         |      |         |                                 |      |         |      |                |
|--|-----------------|------|---------|------|---------|---------------------------------|------|---------|------|----------------|
| Loan Category  | Number of Loans |      |         |      | Total # | Dollar Amount of Loans \$(000s) |      |         |      | Total \$(000s) |
|  | Inside          |      | Outside |      |         | Inside                          |      | Outside |      |                |
|  | #               | %    | #       | %    |         | \$                              | %    | \$      | %    |                |
| Small Business   | 15              | 75.0 | 5       | 25.0 | 20      | 668.5                           | 56.5 | 515.6   | 43.5 | 1,184.1        |
| Small Farm   | 17              | 85.0 | 3       | 15.0 | 20      | 3,512.2                         | 88.3 | 465.0   | 11.7 | 3,977.2        |
| Total  | 32              | 80.0 | 8       | 20.0 | 40      | 4,180.7                         | 81.0 | 980.6   | 19.0 | 5,161.3        |

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data  
 Due to rounding, totals may not equal 100.0

### Description of Institution

FNB Pana is a \$175.3 million intrastate financial institution headquartered in Pana, Illinois (IL). FNB Pana is a full-service banking institution that operates four banking offices in Assumption, Blue Mound, Pana, and Taylorville in IL. On November 4, 2015, FNB Pana acquired and merged The State Bank of Blue Mound. This acquisition expanded the bank’s AA into the Decatur MSA. All branches have non-deposit taking ATMs. The bank has not opened or closed any branches during the evaluation period. In addition to its branch network, FNB Pana’s delivery channels include Internet banking, mobile banking, telephone banking, and bank by mail. FNB Pana offers conventional deposit and loan products.

FNB Pana designated two AAs in IL, the only rating area for this institution. The IL non-MSA AA includes Christian County and a portion of Shelby County. The Decatur MSA AA includes a portion of Macon County.

As of December 31, 2018, the bank’s loan portfolio totaled \$134.4 million, or 76.7 percent of total assets. Tier 1 capital was \$20.8 million. The following table represents the loan portfolio mix at year-end 2018:

| <b>Loan Portfolio Summary by Loan Product</b>    |                                 |
|--|---------------------------------|
| <b>Loan Category</b>                             | <b>% of Outstanding Dollars</b> |
| Business Loans, including Commercial Real Estate | 43.9%                           |
| Farm Loans, including farmland                   | 26.9%                           |
| Home Loans                                       | 26.8%                           |
| Consumer loans                                   | 2.4%                            |

Source: December 31, 2018 Uniform Bank Performance Report (UBPR)

FNB Pana’s mission statement is to remain a locally owned community bank offering a complete line of banking services while delivering sound financial solutions and exceptional customer service. There are no known impediments limiting the bank’s ability to help meet the credit needs of its local community, including low- and moderate-income families and neighborhoods. FNB Pana received a “Satisfactory” rating during the December 18, 2014 evaluation under the small bank evaluation procedures.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated FNB Pana's CRA performance using Small Bank evaluation procedures. We reviewed the bank's record of meeting the credit needs of its AAs through lending activities. The evaluation period for this review was from January 1, 2016, to December 31, 2018.

Based on both the number and dollar volume of loan origination data supplied by the bank, FNB Pana's primary lending products were business and farm loans. Business loans represented 22.9 percent of the number and 43.6 percent of the dollar volume of loan originations for 2016 through 2018. Farm loans represented 16.2 percent of the number and 36.0 percent of the dollar volume of loan originations during the same timeframe. We sampled both business and farm loans for this evaluation.

For analysis purposes, we compared the bank's lending performance with demographic data from the 2010 United States (U.S.) Census, the 2015 American Community Survey (ACS) U.S. Census, and 2016 and 2018 Dun and Bradstreet (D&B) Data. The income designation of some census tracts (CTs) in the AAs changed in 2017, based upon the 2015 ASC. Therefore, we reviewed the 2016 loan samples separately from the 2017 and 2018 loan samples. No affiliate activity was included in this analysis. Refer to the table in Appendix A for more information on the scope of the review.

### Selection of Areas for Full-Scope Review

FNB Pana has two AAs in the state of Illinois, and we completed a full-scope review of both AAs. Community profiles for the AAs are provided in the "Scope" section of the State of Illinois rating.

### Ratings

The bank's overall rating is based on the State of Illinois rating. The State of Illinois rating is based on the IL non-MSA AA and the Decatur MSA AA full-scope reviews. We placed significant weight on performance in the IL non-MSA AA, as a higher percentage of deposit (81.1 percent) and loan originations (94.1 percent) come from this AA compared to the Decatur MSA AA. We placed more weight on the bank's performance for business loans, given the higher volume of loan originations in both number and dollar. We placed more weight on lending to business and farms of different sizes, as over 75 percent of businesses and 98 percent of farms have revenues of \$1 million or less in the IL non-MSA AA. Only 2 out of 18 CTs in the bank's AAs, or 11.1 percent, were moderate-income geographies, and there were no low-income CTs in the AAs. Refer to the "Scope" section under the state rating section for details regarding how the areas and loan products were weighted in arriving at the respective ratings.

## Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the

OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

## **State Rating**

### **State of Illinois**

**CRA rating for the State of Illinois: Outstanding.**

**The Lending Test is rated: Outstanding.**

The major factor that supports this rating is:

- Lending to businesses and farms of different sizes is excellent.

### **Description of Institution's Operations in Illinois**

FNB Pana has two AAs within the State of Illinois rating area. The AAs include:

- IL non-MSA AA – Christian County, and two adjacent CTs (9592 and 9596) on the western side of Shelby County.
- Decatur, IL MSA (MSA 19500) – Six CTs (23, 24.02, 25, 26.01, 26.02, and 27) in Macon County, representing the southern one-third of the MSA.

The bank operates four branches in the State of Illinois. On November 4, 2015, FNB Pana acquired and merged The State Bank of Blue Mound. This acquisition added the Decatur MSA. There were no other branch openings or closings in the state during the evaluation period.

The primary businesses focus for the Blue Mound branch is business customers. The focus for the other branches is more diversified.

Refer to the community profiles for the state of Illinois below for detailed demographics and other performance context information for AAs that received full-scope reviews.

IL non-MSA AA

| <b>Table A – Demographic Information of the Assessment Area</b>   |          |                       |                              |                          |                         |                       |
|---|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: IL non-MSA 2016</b>   |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>  | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)   | 12       | 0.0                   | 8.3                          | 91.7                     | 0.0                     | 0.0                   |
| Population by Geography   | 41,379   | 0.0                   | 6.7                          | 93.3                     | 0.0                     | 0.0                   |
| Housing Units by Geography  | 18,310   | 0.0                   | 6.8                          | 93.2                     | 0.0                     | 0.0                   |
| Owner-Occupied Units by Geography   | 12,561   | 0.0                   | 5.9                          | 94.1                     | 0.0                     | 0.0                   |
| Occupied Rental Units by Geography  | 3,854    | 0.0                   | 9.8                          | 90.2                     | 0.0                     | 0.0                   |
| Vacant Units by Geography   | 1,895    | 0.0                   | 7.2                          | 92.8                     | 0.0                     | 0.0                   |
| Businesses by Geography   | 1,716    | 0.0                   | 5.7                          | 94.3                     | 0.0                     | 0.0                   |
| Farms by Geography  | 320      | 0.0                   | 1.9                          | 98.1                     | 0.0                     | 0.0                   |
| Family Distribution by Income Level   | 10,916   | 20.3                  | 18.4                         | 24.5                     | 36.8                    | 0.0                   |
| Household Distribution by Income Level  | 16,415   | 24.5                  | 16.0                         | 18.9                     | 40.7                    | 0.0                   |
| Median Family Income Non-MSAs – IL  |          | \$54,499              | Median Housing Value         |                          |                         | \$81,760              |
|   |          |                       | Median Gross Rent            |                          |                         | \$576                 |
|   |          |                       | Families Below Poverty Level |                          |                         | 12.0%                 |
| <i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                       |                              |                          |                         |                       |

| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                       |                              |                          |                         |                       |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: IL non-MSA 2018</b>  |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 12       | 0.0                   | 16.7                         | 75.0                     | 8.3                     | 0.0                   |
| Population by Geography  | 40,288   | 0.0                   | 16.1                         | 78.3                     | 5.6                     | 0.0                   |
| Housing Units by Geography   | 18,512   | 0.0                   | 17.5                         | 77.5                     | 5.0                     | 0.0                   |
| Owner-Occupied Units by<br>Geography   | 12,550   | 0.0                   | 14.8                         | 79.3                     | 5.8                     | 0.0                   |
| Occupied Rental Units by<br>Geography  | 3,925    | 0.0                   | 22.5                         | 74.6                     | 2.9                     | 0.0                   |
| Vacant Units by Geography  | 2,037    | 0.0                   | 24.6                         | 71.8                     | 3.6                     | 0.0                   |
| Businesses by Geography  | 1,706    | 0.0                   | 16.6                         | 77.4                     | 6.0                     | 0.0                   |
| Farms by Geography   | 275      | 0.0                   | 3.6                          | 83.6                     | 12.7                    | 0.0                   |
| Family Distribution by Income<br>Level   | 10,846   | 21.5                  | 18.9                         | 23.2                     | 36.4                    | 0.0                   |
| Household Distribution by<br>Income Level  | 16,475   | 23.3                  | 17.1                         | 19.2                     | 40.4                    | 0.0                   |
| Median Family Income Non-<br>MSAs – IL   |          | \$59,121              | Median Housing Value         |                          |                         | \$85,417              |
|  |          |                       | Median Gross Rent            |                          |                         | \$595                 |
|  |          |                       | Families Below Poverty Level |                          |                         | 10.7%                 |
| <i>Source: 2015 ACS Census and 2018 D&amp;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> |          |                       |                              |                          |                         |                       |

The IL non-MSA AA consists of all of Christian County and two adjacent CTs in Shelby County. The AA is located in central IL approximately 30 miles from both Decatur and Springfield, IL. It is appropriate that the AA does not include all of Shelby County, as the bank has no branches there. However, Pana is only two miles from the Shelby County border. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income (LMI) geographies. There are no low-income CTs in the AA. There was one moderate-income CT in 2016 and two in 2017 and 2018.

The 2015 ACS changed the income designation of two CTs in the AA in 2017. Between 2016 and 2017, CT 9584 was changed to moderate-income from middle-income, and CT 9586 was changed to upper-income from middle-income.

The bank has three branches (75.0 percent) located in Christian County in this AA. The Taylorville branch is located in a moderate-income CT, representing 33.3 percent of branches in the AA. Competition in the AA comes from 20 FDIC-insured deposit institutions, four credit unions, and eight finance companies. As of June 30, 2018, FNB Pana's deposits in the AA totaled \$128.6 million, which was 10.6 percent of the market. The bank's deposit market share ranked fourth out of 20 FDIC-insured deposit institutions, per the June 2018 FDIC deposit market share data. The top three depository

institutions accounted for 42.8 percent of total deposits in the AA. The depository institutions with the highest deposit market share were Shelby County State Bank, Peoples Bank and Trust, and First National Bank in Taylorville.

Employment and Economic Factors

Economic conditions are stable. According to the Bureau of Labor Statistics, unemployment in Christian County was 6.3 percent and Shelby County was 4.9 percent in December 2018. The state and national unemployment rates were 4.4 percent and 3.9 percent, respectively, in December 2018.

Industries driving the local economy include agriculture, healthcare and social assistance, manufacturing, and retail. The largest employers in Christian County are Taylorville Memorial Hospital, Walmart, Taylorville Correctional Center, and GSI. Many residents commute to Springfield, Decatur, and Shelbyville for employment. Businesses in the AA total 1,706 and are primarily small businesses (75.6 percent are businesses with gross annual revenues of \$1 million or less.) D&B did not have revenue information for 18.9 percent of AA businesses. Businesses in the AA located in the moderate-income CTs total 283, or 16.6 percent. Farms in the AA total 275 and 98.9 percent are small farms with gross annual revenues of \$1 million or less. Farms located in the moderate-income CTs total 10, or 3.6 percent.

Community Contact

We performed one community contact with a government agency and reviewed two recent community contacts with an economic development organization and an affordable housing organization. Identified credit needs include small business loans, particularly for start-up companies; small farm loans; and support for affordable housing, including down payment and closing cost assistance programs.

Decatur MSA AA

| <b>Table A – Demographic Information of the Assessment Area</b>   |          |                       |                              |                          |                         |                       |
|---|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: Decatur MSA AA 2016</b>   |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>  | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)   | 6        | 0.0                   | 0.0                          | 16.7                     | 83.3                    | 0.0                   |
| Population by Geography   | 23,731   | 0.0                   | 0.0                          | 10.0                     | 90.0                    | 0.0                   |
| Housing Units by Geography  | 9,991    | 0.0                   | 0.0                          | 10.5                     | 89.5                    | 0.0                   |
| Owner-Occupied Units by Geography   | 7,981    | 0.0                   | 0.0                          | 9.2                      | 90.8                    | 0.0                   |
| Occupied Rental Units by Geography  | 1,315    | 0.0                   | 0.0                          | 14.9                     | 85.1                    | 0.0                   |
| Vacant Units by Geography   | 695      | 0.0                   | 0.0                          | 16.0                     | 84.0                    | 0.0                   |
| Businesses by Geography   | 943      | 0.0                   | 0.0                          | 7.5                      | 92.5                    | 0.0                   |
| Farms by Geography  | 114      | 0.0                   | 0.0                          | 20.2                     | 79.8                    | 0.0                   |
| Family Distribution by Income Level   | 6,860    | 9.5                   | 13.7                         | 22.6                     | 54.3                    | 0.0                   |
| Household Distribution by Income Level  | 9,296    | 11.2                  | 13.4                         | 17.3                     | 58.1                    | 0.0                   |
| Median Family Income MSA - 19500 Decatur, IL MSA  |          | \$57,570              | Median Housing Value         |                          |                         | \$109,901             |
|   |          |                       | Median Gross Rent            |                          |                         | \$647                 |
|   |          |                       | Families Below Poverty Level |                          |                         | 2.2%                  |
| <i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                       |                              |                          |                         |                       |

| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                       |                              |                          |                         |                       |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: Decatur MSA AA 2018</b>  |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 6        | 0.0                   | 0.0                          | 33.3                     | 66.7                    | 0.0                   |
| Population by Geography  | 24,031   | 0.0                   | 0.0                          | 18.6                     | 81.4                    | 0.0                   |
| Housing Units by Geography   | 10,386   | 0.0                   | 0.0                          | 19.0                     | 81.0                    | 0.0                   |
| Owner-Occupied Units by<br>Geography   | 8,148    | 0.0                   | 0.0                          | 18.7                     | 81.3                    | 0.0                   |
| Occupied Rental Units by<br>Geography  | 1,514    | 0.0                   | 0.0                          | 18.0                     | 82.0                    | 0.0                   |
| Vacant Units by Geography  | 724      | 0.0                   | 0.0                          | 24.2                     | 75.8                    | 0.0                   |
| Businesses by Geography  | 924      | 0.0                   | 0.0                          | 16.6                     | 83.4                    | 0.0                   |
| Farms by Geography   | 110      | 0.0                   | 0.0                          | 30.9                     | 69.1                    | 0.0                   |
| Family Distribution by Income<br>Level   | 6,950    | 10.1                  | 14.2                         | 21.8                     | 53.9                    | 0.0                   |
| Household Distribution by<br>Income Level  | 9,662    | 12.1                  | 11.8                         | 17.1                     | 59.0                    | 0.0                   |
| Median Family Income MSA -<br>19500 Decatur, IL MSA  |          | \$60,745              | Median Housing Value         |                          |                         | \$124,094             |
|  |          |                       | Median Gross Rent            |                          |                         | \$766                 |
|  |          |                       | Families Below Poverty Level |                          |                         | 3.8%                  |
| <i>Source: 2015 ACS Census and 2018 D&amp;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> |          |                       |                              |                          |                         |                       |

The Decatur MSA AA consists of six CTs (27, 26.02, 26.01, 25, 24.02, and 23) in Macon County representing the southern one-third of the MSA (19500). It is appropriate that the AA does not include the entire MSA, as the bank's one branch in the MSA is located in a small rural community on the southwestern edge of the county. The AA meets the requirements of the regulations and does not arbitrarily exclude LMI geographies. There are no LMI geographies in the AA.

The 2015 ACS changed the income designation of one CT in the AA in 2017. Between 2016 and 2017, CT 26.02 was changed to middle-income from upper-income.

Competition in the AA comes from 14 FDIC-insured deposit institutions, eight credit unions, three mortgage companies, and 15 finance companies located in Macon County. As of June 30, 2018, FNB Pana's deposits in the AA totaled \$27.0 million, which is 1.4 percent of the Macon County market. The bank's deposit market share ranked eleventh out of 14 FDIC-insured deposit institutions, per the June 2018 FDIC deposit market share data. The top three depository institutions accounted for 63.3 percent of total deposits in the county. The depository institutions with the highest deposit market share were Hickory Point Bank and Trust, Busey Bank, and First Mid Bank and Trust N.A.

### Employment and Economic Factors

The economic conditions show slow recovery. According to the Bureau of Labor Statistics, unemployment in Macon County was 6.3 percent in December 2018. The state and national unemployment rates were 4.4 percent and 3.9 percent, respectively, in December 2018.

Industries driving the local economy include healthcare and social assistance, manufacturing, and retail. The largest employers in Macon County are Archer Daniels Midland Company, Caterpillar Inc, DMH Health Systems, Decatur Public Schools, and HSHS St Mary's Hospital. Businesses in the AA total 924 and are primarily small businesses (82.5 percent are businesses with gross annual revenues of \$1 million or less.)

### Community Contact

We performed one community contact with a government agency and reviewed three recent community contacts with an economic development organization, an affordable housing organization, and a charitable organization. Identified credit needs include small business loans, particularly for start-up companies; small farm loans; support for affordable housing, including down payment and closing cost assistance programs; and support for organizations providing social services, including homelessness prevention, job training, and financial literacy education.

## **Scope of Evaluation in Illinois**

This analysis reflect a full-scope review of both AAs in this state.

As the Decatur MSA AA has no LMI geographies, no meaningful analysis of geographic distribution of business and farm loans could be performed in this AA. We also determined that business loans were the primary product in the Decatur MSA AA based on the volume of loan originations during the evaluation period. As farm loans were not a primary product for the Decatur MSA, we did not review farm loan originations for this AA

Refer to the table in Appendix A: Scope of Examination for additional information.

## **LENDING TEST**

The bank's performance under the Lending Test in the State of Illinois is Outstanding. Based on full-scope reviews, lending to both businesses and farms of different sizes is excellent. The geographic distribution is reasonable. We placed more weight on lending to businesses of different sizes given the majority of businesses and farms are considered small based upon annual revenues and the limited number of LMI geographies in the AAs.

We compared the bank's performance with both demographic comparators and aggregate lender information. We placed more weight on the demographic comparator analysis, as this institution and most of its competitors are not required to report small loans made to businesses and farms.

## **Distribution of Loans by Income Level of the Geography**

The bank exhibits reasonable geographic distribution of business and farm loans in the State of Illinois. The IL non-MSA reflects reasonable penetration in the moderate-income geographies. The geographic distribution of small loans to businesses is reasonable and the distribution of small loans to farms is excellent. We placed more weight on lending performance for business loans given the volume of loans originated and the limited opportunity to lend to farms in the moderate-income CTs. This conclusion was based upon FNB Pana's performance in moderate-income geographies in the IL non-MSA AA. There were no low-income geographies in the AAs. There were no conspicuous lending gaps noted.

### ***Small Loans to Businesses***

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is reasonable in Illinois.

Refer to Table Q in appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

#### **IL non-MSA AA**

The geographic distribution of small loans to businesses in the IL non-MSA AA is reasonable. We placed the most weight on performance in 2017 and 2018 based on the volume of business loan originations. There were no low-income tracts in this AA in 2016, 2017, or 2018. There was one moderate-income tract (8.3 percent) in 2016 and two (16.7 percent) in 2017 and 2018 within this AA.

The distribution of FNB Pana's small loans to businesses in 2016 in the moderate-income CT is reasonable. The proportion of loans in moderate-income tracts was comparable to the proportion of businesses in that geography, and stronger than the aggregate distribution of loans in that geography.

The distribution of FNB Pana's small loans to businesses in 2017 and 2018 in the moderate-income CTs was reasonable. The proportion of loans in moderate-income tracts was comparable to the proportion of businesses in those geographies and the aggregate distribution of loans in those geographies.

### ***Small Loans to Farms***

Based on the data in Table S and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to farms is excellent in Illinois.

Refer to Table S in appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to farms.

#### **IL non-MSA AA**

Overall, the geographic distribution of small loans to farms in the IL non-MSA AA is excellent. We placed the most weight on performance in 2017 and 2018 based on the volume of farm loans originated during the evaluation period. There was one moderate-income tract (8.3 percent) in 2016 and two (16.7 percent) in 2017 and 2018 within this AA. Both moderate-income CTs are primarily located within city

limits; one CT in Pana and one CT in Taylorville, which significantly limits the opportunity to originate farm loans in these CTs. There were no low-income tracts in this AA in 2016, 2017, or 2018.

The distribution of FNB Pana's small loans to farms in 2016 in the moderate-income CT was reasonable. The proportion of loans in the moderate-income CT was weaker than the proportion of farms in that geography, but comparable to the aggregate distribution of loans in that geography. There were only six farms (representing 1.9 percent of all farms in the AA) located in the moderate-income CT in the IL non-MSA AA in 2016. Based on our sample, the bank made no farm loans in the moderate-income tract, which was comparable to the aggregate distribution of loans in that geography of 0.0 percent.

The distribution of FNB Pana's small loans to farms in 2017 and 2018 in moderate-income geographies was excellent. The proportion of loans in moderate-income tracts was significantly stronger than the proportion of farms in those geographies, and significantly stronger than the aggregate distribution of loans in those geographies. There were only 10 farms (representing 3.6 percent of all farms in the AA) located in the moderate-income CTs in the IL non-MSA AA in 2017 and 2018.

### ***Lending Gap Analysis***

We reviewed summary reports and maps and analyzed FNB Pana'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 in the state of Illinois. The bank had primary product originations in all CTs within the AAs.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits excellent distribution of loans to businesses and farms of different sizes, given the product lines offered by the bank. The distribution of small loans to both businesses and farms by revenue is excellent. We placed the most weight on performance in the IL non-MSA AA, as more loans originated in this AA.

### ***Small Loans to Businesses***

Based on the data in Table R and the following performance context considerations, we concluded the distribution of the bank's originations and purchased of small loans to businesses by revenue in Illinois is excellent. The distribution of small loans to businesses by revenue is excellent in the IL non-MSA AA and reasonable in the Decatur MSA.

Refer to Table R in 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.

### **IL non-MSA AA**

The distribution of small loans to businesses in the IL non-MSA AA is excellent.

FNB Pana's distribution of small loans to businesses by revenue in 2016 was excellent. The bank's proportion of loans was significantly stronger than the percentage of small businesses in the AA and the aggregate distribution of loans to those businesses.

FNB Pana's distribution of small loans to businesses by revenue in 2017 and 2018 was excellent. The bank's proportion of loans represented a higher percentage than the percentage of small businesses in the AA and the aggregate distribution of loans to those businesses.

#### Decatur MSA AA

The overall distribution of small loans to businesses in the Decatur MSA AA is reasonable based on lending performance in 2017 and 2018.

The bank did not originate a sufficient volume of business loans in 2016 to conduct a meaningful analysis. The bank's branch is located in a small rural community on the southwestern edge of Macon County, which is on the opposite side of the county from most of the population in the AA. Over 83.4 percent of businesses in the AA are located in the eastern half of the AA. The bank's entry into this AA was new in 2016.

FNB Pana's distribution of small loans to businesses by revenue in 2017 and 2018 was reasonable. The bank's proportion of loans was weaker than the percentage of small businesses in the AA, but comparable to the aggregate distribution of loans to those businesses. The increased lending volume in 2017 and 2018 was attributed to the two-year time period reviewed and more lending activity in Mt Zion in southeastern Macon County. We note that 15 percent of the loans did not have annual gross revenue information. These were smaller loans and most likely small businesses, based upon the information in the file.

#### *Small Loans to Farms*

Based on the data in Table T and the following performance context considerations, we concluded the distribution of the bank's originations and purchased of small loans to farms by revenue in Illinois is excellent. We placed the most weight on the IL non-MSA AA based on the volume of farm loans originated.

Refer to Table T in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

#### IL non-MSA AA

The overall borrower distribution of small loans to farms in the IL non-MSA AA is excellent. Ninety percent, a substantial majority, of the farm loans sampled were made to small farms.

FNB Pana's distribution of small loans to farms in 2016 by revenue was excellent. The bank's proportion of loans was comparable to the percentage of small farms in the AA, and was significantly stronger than the aggregate distribution of loans to those farms.

FNB Pana's distribution of small loans to farms in 2017 and 2018 by revenue was excellent. The bank's proportion of loans was comparable to the percentage of small farms in the AA, and was significantly stronger than the aggregate distribution of loans to those farms.

**Responses to Complaints**

FNB Pana has not received any complaints regarding its CRA performance during the evaluation period.

## Appendix A: Scope of Examination

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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”.

|   |                               |                          |
|---|-------------------------------|--------------------------|
| <b>Time Period Reviewed:</b>                            | (1/31/2016 to 12/31/2018)     |                          |
| <b>Bank Products Reviewed:</b>                          | small business and small farm |                          |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b> | <b>Products Reviewed</b> |
| None  |                               |                          |
| <b>List of Assessment Areas and Type of Examination</b> |                               |                          |
| <b>Rating and Assessment Areas</b>                      | <b>Type of Exam</b>           | <b>Other Information</b> |
| <b>State of Illinois</b>                                |                               |                          |
| IL non-MSA AA   | Full-scope                    |                          |
| Decatur MSA AA  | Full-scope                    |                          |

## Appendix B: Summary of State Ratings

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| Overall Bank:               | Lending Test Rating |
|-----------------------------|---------------------|
| First National Bank of Pana | Outstanding         |
| State:                      |                     |
| Illinois                    | Outstanding         |
|                             |                     |

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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 Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is

available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016**

| Assessment Area: | Total Loans to Small Businesses |           |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|------------------|---------------------------------|-----------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
|                  | #                               | \$ ('000) | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| IL non-MSA       | 20                              | 939.9     | --         | 282            | 0.0               | 0.0          | 0.0       | 5.7                    | 5.0          | 4.3       | 94.3                 | 95.0         | 95.7      | 0.0                 | 0.0          | 0.0       | 0.0                         | 0.0          | 0.0       |

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.  
 Due to rounding, totals may not equal 100.0

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18**

| Assessment Area: | Total Loans to Small Businesses |           |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|------------------|---------------------------------|-----------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
|                  | #                               | \$ ('000) | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| IL non-MSA       | 30                              | 2,235.0   | --         | 258            | 0.0               | 0.0          | 0.0       | 16.6                   | 16.7         | 15.1      | 77.4                 | 83.3         | 76.4      | 6.0                 | 0.0          | 8.5       | 0.0                         | 0.0          | 0.0       |

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

| <b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>   |                                 |           |            |                |                                 |              |           |                                |              |  | <b>2016</b>  |
|--|---------------------------------|-----------|------------|----------------|---------------------------------|--------------|-----------|--------------------------------|--------------|--|--------------|
| Assessment Area:   | Total Loans to Small Businesses |           |            |                | Businesses with Revenues <= 1MM |              |           | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |              |
|  | #                               | \$ ('000) | % of Total | Overall Market | % Businesses                    | % Bank Loans | Aggregate | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans |
| IL non-MSA   | 20                              | 939.9     | --         | 282            | 77.6                            | 95.0         | 38.7      | 4.8                            | 5.0          | 17.6                                   | 0.0          |
| <i>Source: 2016 D&amp;B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.<br/>                     Due to rounding, totals may not equal 100.0</i> |                                 |           |            |                |                                 |              |           |                                |              |  |              |

| <b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>  |                                 |           |            |                |                                 |              |           |                                |              |  | <b>2017-18</b> |
|---|---------------------------------|-----------|------------|----------------|---------------------------------|--------------|-----------|--------------------------------|--------------|--|----------------|
| Assessment Area:  | Total Loans to Small Businesses |           |            |                | Businesses with Revenues <= 1MM |              |           | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |                |
|   | #                               | \$ ('000) | % of Total | Overall Market | % Businesses                    | % Bank Loans | Aggregate | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans   |
| IL non-MSA  | 30                              | 2,235.0   | --         | 258            | 75.6                            | 83.3         | 45.3      | 5.5                            | 10.0         | 18.9                                   | 6.7            |
| Decatur MSA   | 20                              | 2,138.6   | --         | 205            | 82.5                            | 55.0         | 53.7      | 3.7                            | 30.0         | 13.9                                   | 15.0           |
| <i>Source: 2018 D&amp;B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data.<br/>                     Due to rounding, totals may not equal 100.0. In the IL non-MSA, two loans for \$104.2 did not have gross revenue data available.<br/>                     In the Decatur MSA, three loans totaling \$64,000 did not have gross revenue data available.</i> |                                 |           |            |                |                                 |              |           |                                |              |  |                |

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016**

| Assessment Area: | Total Loans to Farms |           |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|------------------|----------------------|-----------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
|                  | #                    | \$ ('000) | % of Total | Overall Market | % Farms           | % Bank Loans | Aggregate | % Farms                | % Bank Loans | Aggregate | % Farms              | % Bank Loans | Aggregate | % Farms             | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | Aggregate |
| IL non-MSA       | 20                   | 4,837     | --         | 112            | 0.0               | 0.0          | 0.0       | 1.9                    | 0.0          | 0.0       | 98.1                 | 100.0        | 100.0     | 0.0                 | 0.0          | 0.0       | 0.0                         | 0.0          | 0.0       |

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.  
 Due to rounding, totals may not equal 100.0

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18**

| Assessment Area: | Total Loans to Farms |           |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|------------------|----------------------|-----------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
|                  | #                    | \$ ('000) | % of Total | Overall Market | % Farms           | % Bank Loans | Aggregate | % Farms                | % Bank Loans | Aggregate | % Farms              | % Bank Loans | Aggregate | % Farms             | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | Aggregate |
| IL non-MSA       | 20                   | 3,933.3   | --         | 101            | 0.0               | 0.0          | 0.0       | 3.6                    | 5.0          | 2.0       | 83.6                 | 85.0         | 85.1      | 12.7                | 10.0         | 12.9      | 0.0                         | 0.0          | 0.0       |

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

| <b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>  |                      |           |            |                |                            |              |           |                           |              |                                   | <b>2016</b>  |
|--|----------------------|-----------|------------|----------------|----------------------------|--------------|-----------|---------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:   | Total Loans to Farms |           |            |                | Farms with Revenues <= 1MM |              |           | Farms with Revenues > 1MM |              | Farms with Revenues Not Available |              |
|  | #                    | \$ ('000) | % of Total | Overall Market | % Farms                    | % Bank Loans | Aggregate | % Farms                   | % Bank Loans | % Farms                           | % Bank Loans |
| IL non-MSA   | 20                   | 4,837.3   | --         | 112            | 99.7                       | 90.0         | 63.4      | 0.0                       | 10.0         | 0.3                               | 0.0          |
| <i>Source: 2016 D&amp;B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.<br/>                     Due to rounding, totals may not equal 100.0</i> |                      |           |            |                |                            |              |           |                           |              |                                   |              |

| <b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>   |                      |           |            |                |                            |              |           |                           |              |                                   | <b>2017-18</b> |
|---|----------------------|-----------|------------|----------------|----------------------------|--------------|-----------|---------------------------|--------------|-----------------------------------|----------------|
| Assessment Area:  | Total Loans to Farms |           |            |                | Farms with Revenues <= 1MM |              |           | Farms with Revenues > 1MM |              | Farms with Revenues Not Available |                |
|   | #                    | \$ ('000) | % of Total | Overall Market | % Farms                    | % Bank Loans | Aggregate | % Farms                   | % Bank Loans | % Farms                           | % Bank Loans   |
| IL non-MSA  | 20                   | 3,933.3   | --         | 101            | 98.9                       | 90.0         | 66.3      | 0.4                       | 5.0          | 0.7                               | 5.0            |
| <i>Source: 2018 D&amp;B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data.<br/>                     Due to rounding, totals may not equal 100.0. One loan for \$150.0 did not have gross revenue data available.</i> |                      |           |            |                |                            |              |           |                           |              |                                   |                |