



**PUBLIC DISCLOSURE**

October 21, 2019

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

MidAmerica National Bank  
Charter Number 13838  
100 West Elm Street  
Canton, Illinois 61520

Office of the Comptroller of the Currency  
Peoria, Illinois Field Office  
211 Fulton Street, Suite 604  
Peoria, Illinois 61602

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

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## Overall CRA Rating

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

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

**The Community Development Test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on the lending performance in Illinois.
- A majority of the bank's lending are to borrower's inside its assessment area (AA).
- The loan-to-deposit ratio is reasonable.
- The borrower distributions are excellent and stronger than the aggregate.
- The Community Development (CD) Test rating is based on performance in Illinois. The bank exhibits adequate responsiveness to community development needs in its AA.

### Loan-to-Deposit Ratio

Considering the bank's size and financial condition and the credit needs of the AA(s), the bank's loan-to-deposit (LTD) ratio is reasonable. This analysis is performed at the bank, rather than the AA, level.

The quarterly average LTD ratio was 64 percent for the period October 1, 2015, to June 30, 2019. MidAmerica National Bank (MNB or bank) had a quarterly low of 59 percent and a quarterly high of 72 percent. MNB's ratio of 64 percent is up from the prior CRA evaluation's average LTD ratio of 56 percent.

MNB ranks fourth among five similarly situated banks serving its AA. The quarterly average LTD ratio for the other four banks over the same period ranged from 61 percent to 80 percent. The similarly situated institutions, which range in asset size from \$100 million to \$500 million, are FDIC insured community financial institutions that compete with MNB for deposits in the AA. The LTD ratio is calculated on a bank-wide basis.

### Lending in Assessment Area

A majority of the bank's loans are inside its assessment areas (AAs).

The bank originated and purchased 85 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.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	84	83	17	17	101	4,372	71	1,746	29	6,118
Consumer	81	88	11	12	92	1,073	88	150	12	1,223
Total	165	85	28	15	193	5,445	74	1,896	26	7,341

Source: Sample of consumer and small business loans originated from 1/1/16 to 12/31/18.

## Description of Institution

MNB is a \$423 million intrastate financial institution headquartered in Canton, Illinois, with operations in central and western Illinois.

MNB is a wholly owned subsidiary of MidAmerica National Bancshares, Inc. (MNB Inc.), a one-bank holding company headquartered in Canton, Illinois. The holding company also owns MidAmerica National Capital Trust (MNCT), an unconsolidated wholly owned subsidiary that issues cumulative preferred securities. MNB does not have any subsidiaries, and MNB Inc. and MNCT do not negatively impact the bank's ability to meet the credit needs of the community.

Branch locations are in the towns of Cuba, Henry, Lewistown, and two branch offices located in Macomb. All locations are equipped with drive-up facilities. MNB has nine automated teller machines (ATM), eight of which accept deposits.

MNB acquired the Henry State Bank in May 2017. This resulted in the expansion of the AAs to include Marshall and Putnam counties. There have been no branch closures since the previous CRA evaluation.

The bank has two AAs in Illinois. The Non-MSA AA includes McDonough County and portions of Fulton and Putnam Counties. The MSA AA is comprised of Marshall County and is part of the Peoria, Illinois, Metropolitan Statistical Area (MSA).

MNB's strategy is to offer a traditional style of banking with local decision-making and community involvement and to provide responsive, personal service to all customers. The bank offers a full range of deposit and loan products and services. Internet, mobile, and telephone banking are also available to the bank's customers. Refer to the bank's public file for a full listing of services.

The market area has a significant level of competition for loans and deposits. MNB competes with national banks, state banks, credit unions, and thrifts. Many residents of Fulton and Marshall Counties commute to Peoria, Illinois, for employment, so the bank has competition from non-local institutions as well. MNB held a 17 percent deposit market share in Fulton, McDonough, and Putnam Counties, ranking first of 26 FDIC insured institutions competing for the area's \$1.7 billion in deposits. MNB held a 27 percent deposit market share in Marshall County, also ranking first of seven FDIC insured institutions competing for the area's \$275 million in deposits.

MNB held 60 percent of net loans and leases to total assets and a tier one leverage capital ratio of 11 percent, at June 30, 2019. Commercial lending represented the largest loan portfolio at \$110 million (42 percent of the portfolio), followed by agricultural lending at \$70 million (27 percent of the portfolio), residential lending at \$53 million (20 percent of the portfolio), and consumer lending at \$25 million (10 percent of the portfolio), as of June 30, 2019.

There are no financial, legal, or other factors impeding MNB's ability to help meet the credit needs of the bank's AA. The bank's previous CRA rating was "Satisfactory Record of Meeting Community Credit Needs" as detailed in the Performance Evaluation dated January 4, 2016.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated MNB under the Intermediate Small Bank evaluation procedures, which include a lending and CD test. The CD test evaluates the bank's community development lending, qualified investments, and CD service activities in its AA during the evaluation period. The lending test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The evaluation period is from January 1, 2016, through December 31, 2018, under both the lending and CD tests.

MNB's primary lending products are commercial and consumer loans. These lending categories account for 73 percent of loans, by number, originated or purchased from January 1, 2016, to December 31, 2018. We used these lending products for the analysis of this evaluation.

The bank is not required to maintain income data on commercial and consumer loans outside of the individual loan files. Consequently, we sampled loans originated and purchased during the lending test evaluation period and compared them to census information. We obtained the income information of the consumer borrowers and the gross revenues of the businesses, as well as geocoded the data for each loan sampled. Performance conclusions for lending between January 1, 2016, and December 31, 2016, are based on 2010 US Census data. Performance conclusions for lending between January 1, 2017, and December 31, 2018, are based on 2015 American Community Survey data.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated 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 each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

We gave more weight to the performance in the Non-MSA AA and less weight to the MSA AA due to the short tenure of lending and deposit activities following the acquisition of Henry State Bank.

The combined lending performance for 2017 and 2018 received a greater weighting than the 2016 performance.

See Appendix A for more information. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **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<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The borrower distributions are excellent and stronger than the aggregate.
- The geographic distributions are poor; however, lending opportunities are limited in the low- and moderate-income CTs.
- The bank exhibits adequate responsiveness to community development needs in its AA.

### Description of Institution's Operations in Illinois

MNB has six locations and nine ATMs in central and western Illinois.

The Non-MSA AA had two low-income CTs and two moderate-income CTs for 2016. The Non-MSA AA had one low-income CT and three moderate-income CTs for 2017-2018.

The low-income CT is in Macomb and is the site of the Western Illinois University (WIU) campus. There are limited lending opportunities in this low-income CT given the low volume of businesses and households. The other low-income CT in 2016 comprised the area surrounding the WIU campus, including the older downtown portion of Macomb. While there are several households in this area, 37 percent of the households are below the poverty level which further limits lending opportunities.

The two moderate-income CTs for 2016 were in the southwest corner of McDonough County and a portion of downtown Canton in Fulton County. Lending in the moderate-income CT of Canton is limited as the area struggles to attract businesses while the CT in McDonough County is not near the bank's location in Macomb.

For 2017-2018, the moderate-income CTs change to the northeast corner of McDonough County, the southwest portion of Macomb, and the southern portion of Canton. The southern portion of Canton contains the State Penitentiary, and there are limited businesses in this area. The northeast corner of McDonough County is not near the bank's Macomb location, and there are other lenders in closer proximity to this area. Twenty-one percent of the households in these moderate-income CTs are below the poverty level, which further limits lending opportunities.

Further lending barriers are present in the bank's Non-MSA AA. Several of the middle-income CTs in McDonough County are distressed due to high levels of poverty in 2016, 2017, and 2018; all the CTs in Fulton County were distressed in 2017 due to high levels of unemployment. In 2016, the unemployment

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

rates for Fulton County peaked at 8.9 percent and McDonough County hit 9.3 percent versus the state of Illinois' high of 6.7 percent for the same year. This may further limit lending opportunities in the Non-MSA AA.

MNB's AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The MSA AA has one moderate-income CT for 2017-2018. This CT is in the southeast corner of Marshall County. Lending opportunities are limited in this CT as it is not near the bank's location in Henry, and there are several other banking locations in closer proximity to serve this CT.

MNB serves the Illinois AAs with a full range of deposit and loan products, and services.

The market area has high levels of competition for loans and deposits. MNB competes with national banks, state banks, credit unions, and thrifts. Many residents of Fulton and Marshall County commute to the larger metropolitan area of Peoria for employment, so the bank competes with non-local financial institutions as well.

The local economic condition for both AAs is recessed but stable. The Fulton, Marshall, McDonough, and Putnam unemployment rates for August 2019 are higher than both the national average and State of Illinois unemployment rates, according to the U.S. Department of Labor. The August 2019 unemployment rate for each area are: Fulton County 5.0 percent, Marshall County 3.9 percent, McDonough County 4.7 percent, Putnam County 3.9 percent, State of Illinois 3.8 percent, and 3.7 percent national average rate.

The economy of both AAs is concentrated in manufacturing, healthcare, government, retail, and educational sectors. Major employers include: Western Illinois University and local school districts, NTN Bower, local hospital and healthcare facilities, and the Illinois River Correctional Center. Please see the market profile in Appendix C for additional information on the AAs.

We made one community contact from the Non-MSA AA during the evaluation. The contact for the Non-MSA AA indicated the primary credit needs in the AA are small business loans. The contact wishes there were more opportunities for local employment, but the lack of quick access to four-lane highways continues to hinder this possibility. The contact also stated there are no credit needs or banking services not met or provided for by the local financial institutions. Overall, the contact felt MNB and the other local financial institutions are meeting the credit needs of the area.

#### Non-MSA AA

**Table A1 - Demographic Information of the Assessment Area**

Assessment Area: Non-MSA (2016)

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	10.0	10.0	70.0	10.0	0.0
Population by Geography	64,057	15.7	8.0	66.5	9.8	0.0
Housing Units by Geography	28,001	12.0	8.7	68.9	10.3	0.0
Owner-Occupied Units by Geography	17,533	3.4	8.7	75.6	12.3	0.0
Occupied Rental Units by Geography	7,676	29.4	7.9	53.7	9.0	0.0



Vacant Units by Geography	2,792	18.6	10.9	68.9	1.6	0.0
Businesses by Geography	2,749	14.4	12.8	62.6	10.1	0.0
Farms by Geography	412	1.9	10.9	79.9	7.3	0.0
Family Distribution by Income Level	15,284	21.7	19.4	21.5	37.4	0.0
Household Distribution by Income Level	25,209	29.6	16.6	17.7	36.2	0.0
Median Family Income Non-MSAs - IL		\$54,499	Median Housing Value			\$82,270
Households Below Poverty Level		20.1%	Median Gross Rent			\$628
			Families Below Poverty Level			11.3%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

(\*) The NA category consists of geographies that have not been assigned an income classification.

### Table A2 - Demographic Information of the Assessment Area

#### Assessment Area: Non-MSA (2017-2018)

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	4.8	14.3	57.1	23.8	0.0
Population by Geography	65,709	3.9	17.6	49.2	29.3	0.0
Housing Units by Geography	29,915	0.6	15.0	53.2	31.2	0.0
Owner-Occupied Units by Geography	17,824	0.0	14.3	57.2	28.6	0.0
Occupied Rental Units by Geography	7,802	0.9	19.1	47.7	32.4	0.0
Vacant Units by Geography	4,289	2.5	10.9	46.8	39.8	0.0
Businesses by Geography	2,780	0.2	16.2	51.6	32.1	0.0
Farms by Geography	375	0.0	6.4	69.9	23.7	0.0
Family Distribution by Income Level	15,617	20.7	17.9	21.2	40.3	0.0
Household Distribution by Income Level	25,626	27.3	15.7	16.5	40.5	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housing Value			\$92,205
Households Below Poverty Level		17.9%	Median Gross Rent			\$627
			Families Below Poverty Level			11.0%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

(\*) The NA category consists of geographies that have not been assigned an income classification.

### MSA AA

### Table A3 - Demographic Information of the Assessment Area

#### Assessment Area: MSA (2017-2018)

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5	0.0	20.0	80.0	0.0	0.0
Population by Geography	12,173	0.0	16.6	83.4	0.0	0.0
Housing Units by Geography	5,912	0.0	16.9	83.1	0.0	0.0
Owner-Occupied Units by Geography	4,155	0.0	17.2	82.8	0.0	0.0
Occupied Rental Units by Geography	838	0.0	18.9	81.1	0.0	0.0

Vacant Units by Geography	919	0.0	13.4	86.6	0.0	0.0
Businesses by Geography	606	0.0	13.9	86.1	0.0	0.0
Farms by Geography	107	0.0	15.9	84.1	0.0	0.0
Family Distribution by Income Level	3,235	17.4	21.7	24.5	36.4	0.0
Household Distribution by Income Level	4,993	21.2	18.1	22.5	38.2	0.0
Median Family Income MSA - 37900 Peoria, IL MSA		\$69,329	Median Housing Value			\$106,618
Households Below Poverty Level		9.3%	Median Gross Rent			\$628
			Families Below Poverty Level			5.9%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data            Due to rounding, totals may not equal 100.0            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Illinois

The Illinois rating area has two AAs. The Non-MSA AA received a full-scope review while the MSA AA received a limited-scope. The combined lending performance for 2017 and 2018 received a greater weighting than the 2016 performance. See Appendix A for more information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

### LENDING TEST

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

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

MNB's primary lending products are commercial and consumer loans. These lending categories account for 73 percent of loans, by number, originated or purchased from January 1, 2016, to December 31, 2018. We used these lending products for the analysis of this evaluation. An analysis of home mortgages and agricultural loans would not be meaningful.

For the geographic distribution, MNB's lending levels are below the level stated by the aggregate in the Non-MSA AA as well as demographic comparators for small businesses and households located in the low- and moderate-income geographies. This performance may be attributed to a limited number of lending opportunities given the lower volume of low- and moderate-income geographies and their attributes. We did not identify any conspicuous gaps in the bank's lending performance.

For the borrower distribution, MNB's lending to small businesses and low- and moderate-income households is comparable to or exceeds the level conveyed by demographic comparators as well as the aggregate in the Non-MSA AA.

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

The bank exhibits poor geographic distribution of loans in the state; however, lending opportunities are limited in these LMI geographies.

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

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.

For 2016, the distribution of small business loans reflected poor distribution in the Non-MSA AA. The proportion of lending in the low- and moderate-income geographies was substantially less than the demographic data and significantly weaker than the aggregate distribution.

For 2017 and 2018, the distribution of small business loans reflected poor distribution in the Non-MSA AA. The proportion of lending in the low-income geographies was satisfactory as it was comparable to the demographic data and consistent with the aggregate distribution. The proportion of lending in moderate-income geographies was below the demographic data and weaker than the aggregate distribution.

Performance in the limited-scope MSA AA is consistent with the Non-MSA AA's 2016 performance for the moderate-income CTs. There are no low-income geographies in the MSA AA.

We did not identify any conspicuous gaps in the bank's lending performance. As noted above, business lending opportunities may be limited among the low- and moderate-income geographies in the AAs.

### ***Consumer Loans***

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.

For 2016, the distribution of consumer loans reflected poor distribution in the Non-MSA AA. The proportion of lending in the low- and moderate-income geographies was substantially less than the demographic data.

For 2017 and 2018, the distribution of consumer loans reflected poor distribution in the Non-MSA AA. The proportion of lending in the low-income geographies was satisfactory as it was comparable to the demographic data. The proportion of lending in moderate-income geographies below the demographic data.

Performance in the limited-scope MSA AA is consistent with the Non-MSA AA's 2017-2018 performance for the moderate-income CTs. There are no low-income CTs in the MSA AA.

We did not identify any conspicuous gaps in the bank's lending performance. As noted above, lending opportunities may be limited among the LMI geographies in the AAs.

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

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

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

Refer to Table R in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

For both 2016 and 2017-2018, the distribution of small business loans reflected excellent distribution in the Non-MSA AA. The proportion of lending to small businesses was above the demographic data and significantly exceeded the aggregate distribution.

Performance in the limited-scope MSA AA is consistent with lending in the Non-MSA AA.

We did not identify any conspicuous gaps in the bank's lending performance.

### ***Consumer Loans***

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

For 2016, the distribution of consumer loans reflected satisfactory distribution in the Non-MSA AA. The proportion of lending to low-income households was consistent with demographic data. The proportion of lending to moderate-income households exceeded the demographic data.

For 2017 and 2018, the distribution of consumer loans reflected satisfactory distribution in the Non-MSA AA. The proportion of lending to low- and moderate-income households was consistent with demographic data.

Performance in the limited-scope MSA AA was not consistent with lending activity in the Non-MSA AA. Lending to low- and moderate-income households significantly exceeded the demographic data.

We did not identify any conspicuous gaps in the bank's lending performance.

### **Responses to Complaints**

MNB did not receive any complaints about its performance in helping to meet the credit needs of its AAs during the evaluation period.

### **Conclusions for Area Receiving a Limited Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the MSA AA is consistent with the bank's overall performance under the Lending Test in the full scope area.

## **COMMUNITY DEVELOPMENT TEST**

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

Based on full-scope and limited-scope reviews, the bank exhibits adequate responsiveness to CD needs in the MMSA through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

### **Number and Amount of Community Development Loans**

MNB's CD lending performance is adequate in the Non-MSA AA.

In the Non-MSA AA, MNB originated ten loans and lines of credit totaling \$600 thousand during the evaluation period to organizations providing childcare to LMI families, assisting LMI individuals with affordable housing, and aiding new small businesses as part of their economic development initiative.

MNB is active in trying to generate new business in their AA. Recently the bank developed a program with two other local financial institutions in Canton to provide low-cost financing to businesses purchasing real estate in the downtown Canton area. One loan was originated from this new program during our evaluation period totaling \$103 thousand for MNB's share in the project.

MNB also established five letters of credit and loan commitments totaling \$910 thousand to organizations providing healthcare and other services to LMI individuals.

### **Number and Amount of Qualified Investments**

MNB's CD investment performance is adequate in the Non-MSA AA.

MNB made a total of \$795 thousand in qualified investments during the evaluation period. \$750 thousand was an investment purchased to fund improvements for a local school where most of the students are from LMI families. MNB made an additional \$45 thousand in cash contributions and donations to several organizations assisting LMI individuals and families in the bank's AA as well as support for various local economic development initiatives. Some notable beneficiaries include programs benefiting underprivileged children and providing healthcare services to LMI individuals.

### **Extent to Which the Bank Provides Community Development Services**

MNB's CD services performance is adequate in the Non-MSA AA.

Delivery systems are reasonably accessible to individuals of different income levels. MNB operates six full-service locations and nine ATMs within the AAs. One office was located in a low-income CT, and one office was located in a moderate-income CT under the 2010 US Census data (for 2016). All locations are now located in middle- and upper-income tracts, although some were identified as distressed due to unemployment. Extended hours are available at the drive-up locations. MNB's loan and deposit products are available at all locations. The officers and employees of the bank are involved in a number of qualified community service organizations in the Non-MSA AA.

MNB offers loan programs and grants assisting low- and moderate-income borrowers. Not all banks may be offering these loan options, so the bank is providing a needed CD service by offering these types of loan products.

MNB offers the Federal Home Loan Bank's Downpayment Plus Program. This program offers grants for low- and moderate-income families to assist with down payment and closing costs. The Federal

Home Loan Bank sets maximum income guidelines for people to qualify for the program. MNB provided initial funding of \$24 thousand on four loans in the Non-MSA AA during the evaluation period.

**Conclusions for Area Receiving a Limited Scope Review**

Based on a limited-scope review, the bank's performance under the CD Test in the MSA AA is weaker than the bank's overall performance under the CD Test in the full scope area. CD activities in the MSA AA is limited to an \$86 thousand loan providing affordable housing. MNB displayed poor responsiveness to the CD needs of the MSA AA.

## 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 MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/16 to 12/31/18	
<b>Bank Products Reviewed:</b>	Small business, consumer loans Community development loans, qualified investments, community development services	
<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>Illinois</b>		
Non-MSA AA	Full-scope	County of McDonough, Partial County of Fulton, and Partial County of Putnam
MSA AA	Limited-scope	County of Marshall (Part of Peoria, IL MSA)

## Appendix B: Summary of MMSA and State Ratings

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RATINGS			
MidAmerica National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
MidAmerica National Bank	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Illinois	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.



## Appendix C: Definitions and Common Abbreviations

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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 O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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

Assessment Area:	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA	14.4	0	13.4	12.8	3.9	9.0	62.6	92.3	67.5	10.1	0	10.1	0.0	0	0.0
<b>Total</b>	<b>14.4</b>	<b>0</b>	<b>13.4</b>	<b>12.8</b>	<b>3.9</b>	<b>9.0</b>	<b>62.6</b>	<b>92.3</b>	<b>67.5</b>	<b>10.1</b>	<b>0</b>	<b>10.1</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-2018**

Assessment Area:	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA	0.1	0	0.2	16.5	11.1	18.8	51.0	58.3	45.4	32.4	30.6	35.6	0.0	0	0.0
<b>Total</b>	<b>0.1</b>	<b>0</b>	<b>0.2</b>	<b>16.5</b>	<b>11.1</b>	<b>18.8</b>	<b>51.0</b>	<b>58.3</b>	<b>45.4</b>	<b>32.4</b>	<b>30.6</b>	<b>35.6</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017-2018**

Assessment Area:	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
MSA	0.0	0	0.0	12.8	4.6	28.7	87.2	95.4	71.3	0.0	0	0.0	0.0	0	0.0
<b>Total</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>12.8</b>	<b>4.6</b>	<b>28.7</b>	<b>87.2</b>	<b>95.4</b>	<b>71.3</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>

Source: 2017 D&B Data; 05/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

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

Assessment Area:	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA	11.3	0	8.5	3.7	68.9	92.6	11.3	3.7	0.0	0

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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2017-2018**

Assessment Area:	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA	0.3	0	15.7	9.4	54.3	78.1	29.7	12.5	0.0	0



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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2017-2018**

Assessment Area:	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
MSA	0.0	0	17.5	4.4	82.5	95.6	0.0	0	0.0	0

Source: 2015 ACS Census; 05/01/2017 - 12/31/2018 Bank Data.  
 Due to rounding, totals may not equal 100.0

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

Assessment Area:	Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Non-MSA	74.2	88.5	45.2	4.8	7.7	21.1	3.8
<b>Total</b>	<b>74.2</b>	<b>88.5</b>	<b>45.2</b>	<b>4.8</b>	<b>7.7</b>	<b>21.1</b>	<b>3.8</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-2018**

Assessment Area:	Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Non-MSA	73.6	83.3	48.8	5.3	16.7	21.0	0
<b>Total</b>	<b>73.6</b>	<b>83.3</b>	<b>48.8</b>	<b>5.3</b>	<b>16.7</b>	<b>21.0</b>	<b>0</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017 -2018**

Assessment Area:	Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MSA	73.7	90.9	49.3	5.6	4.6	20.7	4.6
<b>Total</b>	<b>73.7</b>	<b>90.9</b>	<b>49.3</b>	<b>5.6</b>	<b>4.6</b>	<b>20.7</b>	<b>4.6</b>

Source: 2017 D&B Data; 05/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2016**

Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA	29.6	22.2	16.6	25.9	17.7	25.9	36.2	22.2	0.0	3.7
<b>Total</b>	<b>29.6</b>	<b>22.2</b>	<b>16.6</b>	<b>25.9</b>	<b>17.7</b>	<b>25.9</b>	<b>36.2</b>	<b>22.2</b>	<b>0.0</b>	<b>3.7</b>

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

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-2018**

Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA	27.3	25.0	15.7	12.5	16.5	25.0	40.5	37.5	0.0	0
<b>Total</b>	<b>27.3</b>	<b>25.0</b>	<b>15.7</b>	<b>12.5</b>	<b>16.5</b>	<b>25.0</b>	<b>40.5</b>	<b>37.5</b>	<b>0.0</b>	<b>0</b>

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

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-2018**

Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
MSA	21.2	47.8	18.1	26.1	22.5	13.0	38.2	13.0	0.0	0
<b>Total</b>	<b>21.2</b>	<b>47.8</b>	<b>18.1</b>	<b>26.1</b>	<b>22.5</b>	<b>13.0</b>	<b>38.2</b>	<b>13.0</b>	<b>0.0</b>	<b>0</b>

Source: 2015 ACS Census; 05/01/2017 - 12/31/2018 Bank Data.  
 Due to rounding, totals may not equal 100.0